

CHAPTER 2

The County PRC Plan

This section provides details regarding the Ohio PRC program. It addresses the fundamentals of a good county PRC plan, including utilizing the community planning process and understanding county responsibilities.

2000 Community Plan Framework for County PRC Plan

In creating the Prevention, Retention and Contingency (PRC) program, the General Assembly delegated significant flexibility to Ohio counties to tailor PRC programs to local needs, preferences, and opportunities. This approach empowers counties to develop strategies to prevent dependency on cash assistance and promote employment. The opportunity for local decision-making necessitates developing a process for identifying local needs, coordinating with other local service providers, setting program goals, measuring success and adjusting service priorities and efforts. To assist in this process, section 329.06 of the Ohio Revised Code requires counties to establish a local County Family Services Planning Committee designed to provide advice on these issues to each Board of County Commissioners. The community planning process should create a context and framework for the specific provisions necessary to complete a county PRC plan. Through experience, successful county plans should:

- involve the local stakeholders,
- identify local needs and opportunities,
- determine desired outcomes,
- identify available services,
- assess service gaps,
- determine service priorities and strategies,
- periodically review status of strategies and services,
- measure the effect of services and strategies on outcomes, and
- periodically adjust and change strategies and priorities

To assist in this process, the Ohio Department of Job and Family Services (ODJFS) has published “A Guide for Revising and Managing Community Plans” at <http://innerweb/ofam/cpmh.pdf>.

As each county explores the requirements of the PRC plan, it is important that these steps be guided by an overall strategy to serve low income families in the context of resources, opportunities and needs of each county.

2010 Initial PRC Plan and Biennial Renewals

Chapter 5108 of the Ohio Revised Code requires each County Department of Job and Family Services (CDJFS) to adopt an initial written statement of policies governing the PRC program for the county no later than October 1, 2003. The plan then needs to be renewed at least biennially (i.e., October 1, 2005, October 1, 2007, October 1, 2009, etc.). The County PRC Plan creates the authority for counties to deliver PRC benefits and services. Without a fully developed plan, expenditures of PRC funds may be subject to audit exceptions.

Section 5108.05 of the Ohio Revised Code sets forth the requirements for establishing a PRC plan:

In adopting a statement of policies under section 5108.04 of the Revised Code for the county's prevention, retention, and contingency program, each county department of job and family services shall do all of the following:

- (A) Establish or specify all of the following:
 - (1) Benefits and services to be provided under the program that are allowable uses of federal Title IV-A funds under 42 U.S.C. 601 and 604(a), except that they may not be "assistance" as defined in 45 C.F.R. 260.31(a) but rather benefits and services that 45 C.F.R. 260.31(b) excludes from the definition of assistance;
 - (2) Restrictions on the amount, duration and frequency of the benefits and services;
 - (3) Eligibility requirements for the benefits and services;
 - (4) Fair and equitable procedures for both of the following:
 - (a) The certification of eligibility for the benefits and services that do not have a financial need eligibility requirement;
 - (b) The determination and verification of eligibility for the benefits and services that have a financial need eligibility requirement.
 - (5) Objective criteria for the delivery of the benefits and services;
 - (6) Administrative requirements;
 - (7) Other matters the county department determines are necessary.
- (B) Provide for the statement of policies to be consistent with all of the following:

- (1) The plan of cooperation the board of county commissioners develops under section 307.983 [307.98.3] of the Revised Code;
 - (2) The review and analysis of the county family services committee conducted in accordance with division (B)(2) of section 329.06 of the Revised Code;
 - (3) Title IV-A, federal regulations, state law, the Title IV-A state plan submitted to the United States secretary of health and human services under section 5101.80 of the Revised Code, and amendments to the plan.
- (C) Either provide the public and local government entities at least thirty days to submit comments on, or have the county family services planning committee review, the statement of policies, including the design of the county's prevention, retention, and contingency program, before the county director signs and dates the statement of policies.

As a CDJFS develops their statement of policies, the initial consideration is what purpose of TANF the potential benefits and services are intended to address. Including the purpose of TANF for each PRC benefit and services in the CSJFS statement of policies along with an explanation of how the programs are designed to meet the stated purposes is a way to ensure that the statement of policies is comprehensive and reflects the considerations made in developing the plan. For fiscal coding purposes, including this information ensures programs are coded to the correct fund. Also, third party reviews (such as audits) are facilitated by having a complete statement of policies.

Chapter 3, "Application and Eligibility for PRC" contains more information on the statement of policies requirements.

For the biennial renewal, the CDJFS completes the following steps:

- The CDJFS either provides the public and local government entities at least thirty days to submit comments on the PRC plan or have the County Family Services Planning Committee review it.
- The CDJFS Director signs and dates the PRC plan. The effective date of the biennial renewal shall not be earlier than the date of the CDJFS Director's signature.
- The Board of County Commissioners certifies that the CDJFS has complied with Chapter 5108 of the Ohio Revised Code in adopting the PRC plan. (A sample County Commissioner certification can be found in Appendix C).

- The CDJFS sends a complete copy of the PRC plan electronically to ODJFS at Program-policy@odjfs.state.oh.us no later than ten calendar days after the plan's effective date and no later than the deadline date of each biennial period. In the subject line of the e-mail, please indicate the county name, effective date of the plan, and that this plan is a biennial renewal.
- The CDJFS faxes a copy of the CDJFS Director's signature page (unless transmitted electronically) and the County Commissioners' Certification to the Cash Assistance Policy Section at (614) 466-1767.

2020 PRC Plan Biennial Renewal Checklist

| Completed | Task |
|-----------|--|
| | Review eligibility criteria, services and benefits in current PRC plan to determine if changes are necessary. |
| | Provide for 30-day comment period or submit to County Family Services Planning Committee. |
| | Complete any revisions based upon comments from the County Family Services Planning Committee or through 30-day comment period. |
| | Secure CDJFS Director signature. |
| | Secure County Commissioner certification that the PRC plan has complied with Chapter 5108 of the Ohio Revised Code. |
| | Submit the complete PRC plan electronically after the plan's effective date and no later than the deadline date of each biennial period (October 1, 2005, October 1, 2007, October 1, 2009, etc) to Program-policy@odjfs.state.oh.us . |
| | Fax CDJFS Director's signature page (unless electronically sent) and County Commissioner certification to (614) 466-1767. |

2030 Amendments to PRC Plans

A CDJFS may not suspend its PRC plan entirely; however, a CDJFS may amend its PRC plan as needed. To amend the plan, the CDJFS must complete the following steps:

- The CDJFS Director signs and dates the PRC plan. The effective date of the amendment shall not be earlier than the date of the CDJFS Director's signature.

- Under section 5108.07 of the Ohio Revised Code, certification of amendments by the Board of County Commissioners is not required unless the Board considers the change to the PRC plan to be significant. We recommend that the CDJFS and the Board of County Commissioners come to an understanding of what amendments are considered “significant” and therefore require revised certification by the Board.
- The CDJFS sends a complete copy of the PRC plan electronically to ODJFS at Program-policy@odjfs.state.oh.us no later than ten calendar days after the plan’s effective date. In the subject line of the e-mail, please indicate the county name, effective date of the plan, and that this plan is an amendment. A complete plan, which includes amended changes, provides a complete description of the current county plan. An incomplete plan cannot be accepted or confirmed as being received.
- The CDJFS faxes a copy of the CDJFS Director’s signature page (unless transmitted electronically) and County Commissioner Certification (if required by the Board of County Commissioners) to the Cash Assistance Policy Section at (614) 466-1767.

2040 PRC Plan Amendment Checklist

| Completed | Task |
|-----------|---|
| | Review eligibility criteria, services and benefits in current PRC plan to determine if changes are necessary. |
| | Secure CDJFS Director signature. |
| | Secure County Commissioner certification that the PRC plan has complied with Chapter 5108 of the Ohio Revised Code ONLY if the Board of County Commissioners requires it due to significant changes to the plan. |
| | Submit the complete PRC plan electronically no later than 10 calendar days from the effective date to Program-policy@odjfs.state.oh.us . A complete copy of the PRC plan, including the amendment, must be submitted. |
| | Fax CDJFS signature page (unless electronically sent) and County Commissioner certification (if applicable) to (614) 466-1767. |

Appendix D contains a flowchart for Renewing/Amending a PRC Plan.

2050 Summary of PRC Plan Update/Amendment Procedures

| Requirement | Biennial Renewal | Amendment |
|--|--|---|
| Submission requirement | Prior to October 1, 2005 and at least every 2 years thereafter. | When a change of the plan is made. A complete copy of the PRC plan, including the amendment, must be submitted. |
| 30-day public Comment period or review by County Family Services Planning Committee | Required. | Not required. |
| Effective date | Cannot be earlier than the CDJFS Director's signature. | Cannot be earlier than the CDJFS Director's signature. |
| County Commissioner Certification | Required. | Not required, unless the Board of County Commissioners considers the change to the plan significant. |
| Submission to ODJFS | Complete plan sent electronically to Program-policy@odjfs.state.oh.us no later than the deadline date of each biennial period. | Complete plan sent electronically to Program-policy@odjfs.state.oh.us within 10 calendar days after the plan's effective date. |
| Director's signature page | Fax to Cash Assistance Policy @ (614) 466-1767 unless transmitted electronically. | Fax to Cash Assistance Policy @ (614) 466-1767 unless transmitted electronically. |
| County Commissioner certification | Required and faxed to Cash Assistance Policy @ (614) 466-1767. | If required by the Board of County Commissioners, faxed to Cash Assistance Policy @ (614) 466-1767. |
| Receipt of PRC plans by ODJFS | The State reviews to determine if the plan is complete and acknowledges receipt to the county. The State neither approves nor disapproves the policies and practices outlined in the plan. A finding that this document is received does not represent the concurrence of the State with any claims by the county. | The State reviews to determine if the plan is complete and acknowledges receipt to the county. The State neither approves nor disapproves the policies and practices outlined in the amendment. A finding that this document is received does not represent the concurrence of the State with any claims by the county. |
| Posting of PRC plans to the internet | As soon as possible once the Plan Review process is complete. | As soon as possible once the Plan Review process is complete. |

County PRC plans can be accessed at <http://jfs.ohio.gov/owf/prc/index.stm>.