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LORAIN COUNTY JOB AND FAMILY SERVICES

MARY LOU GOLSKI, DIRECTOR

42485 NORTH RIDGE ROAD, ELYRIA, OH 44035-1057
(440) 323-5726 / 244-4150 FAX: (440) 323-3422 TDD: (440) 284-4125

Prevention, Retention and
Contingency Plan

Effective 10/1/2015

ORC Section 5108

Contact Person:

Marge Kiely

42485 North Ridge Rd

Elyria, OH 44035

440-284-4360

The Prevention, Retention, and Contingency (PRC) Program is designed to provide benefits and services needed to overcome immediate barriers to help families become and stay self-supporting. The PRC program provides for non-recurring, short-term, crisis-oriented benefits and ongoing services that are directly related to one of the four purposes of the Temporary Assistance for Needy Families (TANF) program. The four purposes of the TANF program are:

- 1) To provide assistance to needy families so that children may be cared for in their own homes or in the home of relatives.
- 2) To end the dependence of needy parents on government benefits by promoting job preparation, work and marriage.
- 3) To prevent and reduce the incidence of out-of-wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies.
- 4) To encourage the formation and maintenance of two-parent families.

Non-recurring, short-term assistance is defined as addressing crisis oriented situations that do not provide for needs expected to extend beyond four (4) months. These non-recurring benefits and services may encompass more than one payment per year, as long as the payment provides short-term relief and addresses a crisis oriented situation rather than meeting ongoing or recurring needs.

The services and benefits provided under the PRC program fall into three categories:

- 1) **Prevention services**: designed to divert families from ongoing cash assistance by providing short term non-assistance.
- 2) **Retention services**: provided to assist an employed member of the family in maintaining employment.
- 3) **Contingency services**: provided to meet an emergent need which, if not met, threatens the safety, health or well-being of one or more family members.

These benefits and services are consistent with the federal definition of "non-assistance" as found in 45C.F.R.260.3.

The definition of "non-assistance" includes:

- 1) Non-recurrent, short-term benefits that:
 - a. Are designed to deal with a specific crisis situation or episode of need;
 - b. Are not intended to meet recurrent or ongoing needs; and
 - c. Will not extend beyond four months;
- 2) Work subsidies (i.e. payments to employers or third parties to help cover the costs of employer wages, benefits, supervision, and training);
- 3) Supportive services such as child care and transportation provided to families who are employed;
- 4) Refundable earned income tax credits;
- 5) Contributions to and distributions from, Individual Development Accounts (IDAs);
- 6) Services such as counseling, case management, peer support, child care information and referral, transitional services, job retention, job advancement, and other employment -related services that do not provide basic income support; and

- 7) Transportation benefits provided under a Job Access or Reverse Commute project to an individual who is not otherwise receiving assistance.

Civil Rights/Limited English Proficiency

The LCDJFS PRC program will be administered in compliance with state and federal civil rights and non-discrimination laws and regulations including, but not limited to, Title VI of the Civil Rights Act of 1964 as amended, Section 504 of the Rehabilitation Act of 1973 as amended, Title II of the Americans with Disabilities Act of 1990, the Age Discrimination Act of 1975, and the Ohio Civil Rights Law.

Compliance will also be met with Title VI of the Civil Rights Act of 1964 to provide meaningful access to programs by Limited English Proficiency (LEP) persons. Meaningful access means that the LEP person's situation can be effectively communicated to the service provider; the LEP person is able to understand the services and benefits available; and the LEP person is able to receive those services and benefits for which he or she is eligible in a timely manner.

Program Operation

To ensure fair and equitable treatment of families applying for PRC, the program shall be continuously in operation according to the standards of policy and procedures as set forth within this document. The covered benefits or services or the amounts specified for the benefits and services listed in the section detailing the scope of coverage may not be reduced, limited, or restricted unless the program is amended or there are no funds available.

Scope of Benefits Services

The attached PRC Scope of Coverage Chart reflects the scope of benefits and services provided under the Lorain County PRC Program. The chart also contains the assistance groups served, and the economic need standards for the particular service specific to the family's circumstances.

Application

To apply for PRC, a PRC-1 "Prevention, Retention, and Contingency (PRC) Program" Application form must be filed with the agency unless otherwise noted in the scope of coverage. The application, related verifications, and any other information related to this process will be kept in the LCDJS Imaging System (ERIMS).

- An approved/authorized PRC application is valid for thirty (30) days from the date the agency receives the signed application in order to address multiple needs. When requesting assistance for additional services, clients must provide all necessary information, verification, and documentation to determine eligibility for the new service.
- Income is verified for the 30 day period prior to the application and the monthly income projected for the application period, taking into account expected changes.
- The total gross income, both earned and unearned of all the PRC AG members must be counted.
- There are no deductions or exclusions allowed from any type of countable income other than the gross earnings of a minor child.
- A face to face interview is required for each application for PRC services/benefits unless otherwise specified in the scope of coverage. The interview needs to speak to eligibility factors, timeliness standards, and available services and benefits under the PRC program, as

well as potential eligibility for other public assistance and community programs. Voter Registration Applications as prescribed by the secretary of state under section 3503.10 of the ORC will be made available to persons who are applying for, receiving assistance from, or participating in the PRC Program. (Reference Section 329.051 of the ORC)

Applicant Responsibility

An applicant for PRC is responsible for completing all necessary documents, furnishing all available facts and information, and cooperating in the eligibility determination process. An applicant must utilize all available income and liquid assets/resources (cash, bank accounts, CD's, stocks, bonds, etc.) to meet their needs. This includes filing applications and pursuing potential ongoing assistance programs such as OWF, DFA, SSI and the Supplemental Nutrition Assistance Program (SNAP), as well as Unemployment Compensation, Social Security, and the Home Energy Assistance Program (HEAP). Failure to pursue available income or resources that could sufficiently meet a portion of or the entire amount of their need will result in the denial of the PRC application.

Assistance Group Composition

PRC benefits and services are available to a family assistance group (AG) who reside in Lorain County. The family assistance group must include a minor child or pregnant individual as defined in Sections 5108.01 and 5108.06 of the revised code. PRC benefits and services are also available to the non-custodial parent of a minor child who lives in Lorain County, and does not live in the same household as the minor child.

An eligible family must include a minor child who resides with a parent, specified relative, legal guardian or legal custodian or consist of a pregnant individual in her 3rd trimester. PRC assistance may also be provided to a pregnant individual in her 3rd trimester with no other minor children.

A child may be "temporarily absent" from the home *for up to six (6) months* in accordance with the time frames *in ORC 5107.10 (which are applicable to PRC)* and still qualify for PRC. During the temporary period, the child is considered to be residing with the parent, caretaker relative, legal guardian, or legal custodian. An eligible family may also consist of a minor child residing with a parent, caretaker relative, legal guardian or legal custodian and other members of the household (who may or may not be related to the minor child) who may significantly enhance the family's ability to achieve economic self-sufficiency.

The assistance group composition for a specific benefit or service is reflected in the section, "Lorain County Department of Job & Family Services - PRC Scope of Coverage Chart". All of the benefits and services in the charts are meant to meet the first two general purposes of TANF.

Ineligible Family AG's

Federal and State law must be adhered to when providing PRC benefits and services. Listed below are Federal and State prohibitions based upon 42 U.S.C. 608, section 431 of PRWORA (as amended by the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 and the Balanced Budget Act of 1997), and the Ohio Revised Code:

- No assistance for families without a minor child;
- No assistance to a single individual, unless such individual is pregnant and in the 3rd trimester;
- No medical services except for pre-pregnancy family planning services;

- No benefits or services to an individual who is not a citizen of the United States or a qualified alien;
- No assistance for families that fraudulently receive assistance under the OWF and/or PRC programs until full repayment occurs per ORC 5101.83.

Eligibility

In order to receive PRC benefits and services each member of the AG must be a citizen of the United States or a qualified alien as defined in Section 5506(d) of Public Law 105-33 (the Balanced Budget Act of 1997).

Each person applying for PRC must provide the county agency (or third party providing agency) with a social security number, or apply for a social security number. Providing a number is a condition of receipt of TANF and is required under Section 1137(a) of the Social Security Act. The social security number will be used to check information provided by the individual.

Eligibility for PRC is dependent upon the AG's demonstration and verification of need for financial assistance and/or services. In order for eligibility to be determined the income of the AG must be compared to the economic need standard established for the benefits and services requested. The economic need standards are based upon federal poverty guideline measures which shall be updated annually, generally in March, when the federal poverty guidelines are released. Eligibility for the PRC AG to receive benefits or services is based on AG income that must be equal to or less than the economic need standard. See the attached Scope of Coverage Chart.

Income

The total gross income, both earned and unearned of all members of the PRC AG shall be counted except for gross earnings of a minor child as defined in Section 5101:1-23-20 (c)(i) of the Ohio Administrative Code. This includes all income which is normally exempt or disregarded when determining eligibility for Ohio Works First (OWF) or Disability Financial Assistance (DFA). All income which is received, or expected to be received, during the thirty (30) day budget period is considered when determining financial need. The 30 day budget period begins with the date of the PRC application. In order to make that determination the income received 30 days prior to the date of application will be verified and utilized to evaluate and project future income. Any expected changes will be documented (verified to the extent possible) and used in projecting more accurately the income expected to be received during the PRC application period. All income and benefits that are exempt per federal rule will be excluded in determining income eligibility for the PRC program per 5101:1-24-20 of the OAC.

For cases in which the income cannot be accurately obtained, the implementation of practices that are reasonable and prudent should occur when determining countable income. A signed JFS 07341, "Applicant/Recipient Authorization for Release of Information" should be obtained from the applicant for an inquiry. Once the release is received, verification which is obtained by phone must contain clear documentation in the PRC AG record concerning the name and position of the supplier of the information, the date the verification was obtained, the amount of the verified income, and the name of the individual who obtained the verification. More stringent verification is required when PRC benefits and services involve a direct monetary gain by the applicant, and potential opportunities for fraud are prevalent.

Unearned Income

The following are examples of unearned income which must be counted. These are examples only and are not meant to be an all-inclusive list:

- RSDI Benefits
- Veteran Administration Benefits
- Workers' Compensation Benefits
- Lump-sum Payments (including tax refunds)
- Unemployment Compensation Benefits
- Private Pension and Retirement Benefits
- OWF, DFA or Supplemental Security Income (SSI)
- Alimony and Child Support
- Strike Benefits
- Rental Income
- Investment Income
- Adoption Assistance
- Foster Care Assistance

Earned Income

Earned Income is income in which the AG member must perform some type of labor or service to receive it. The following are examples of earned income. This is not intended to be an all-inclusive list:

- Earnings from work as an employee
- Earnings from Self-Employment
- Strike benefits if the striker is required to perform services in order to receive payment
- Training Allowance

Residence

PRC benefits and services are available to residents of Lorain County. Residence is established by living in the county voluntarily with the intent to remain permanently or for an indefinite period.

Standard of Promptness

The focus of this program is to provide and authorize benefits and services within ten (10) working days of the receipt of a signed application. In some instances, this time frame will not be met due to unavoidable delays on the part of the applicant or the agency.

A denial of a PRC application due solely to the expiration of the ten-day period is not an acceptable eligibility determination practice. The AG record should contain sufficient documentation of the case activity on the PRC application, including an explanation of unexpected unavoidable delays in processing the application.

Community Resources

The availability of HEAP, FEMA, or Red Cross Disaster money within the local community shall be explored prior to the authorization of PRC for services that would or could be covered by those funding agents. Consideration will be given for limited community resources, and as a result, PRC may be authorized prior to drawing on those limited funds.

All potential community resources that could assist a family in need shall be explored during the determination of eligibility. The Assistance Group PRC file should reflect all attempts to locate and utilize available community resources.

Direct and Contracted Family Stability Services

Families that qualify for Family Stability Contracted Services could access PRC funds if they meet all Federal/State requirements. Receiving Family Stability Contracted Services will not prohibit the use of PRC Direct Services provided by LCDJFS. Contracted Services will use the PRC-1 Application as determined by the agency, unless otherwise noted on the Scope of Coverage.

Services and benefits shall be provided which directly lead to or can be expected to lead the family to becoming Self-Sufficient by accomplishing one or more of the following specific four purposes of TANF:

- To provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives
- To end the dependence of needy parents on government benefits by promoting job preparation, work and marriage
- To prevent and reduce the incidence of out-of-wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies
- To encourage the formation and maintenance of two-parent families

PRC assistance will be authorized with the expectation that the PRC AG will be able to function without additional agency help. Services and benefits shall be provided which directly lead to or can be expected to lead the family in becoming self-sufficient.

Notice of Approval/Denial

Once an application for PRC is approved, the JFS 04074, "Notice of Approval of Your Application for Assistance" shall be mailed or otherwise delivered for each specific service/benefit requested. If it is determined that an application and/or service for PRC is denied, the JFS 07334, "Notice of Denial of Your Application for Assistance" shall be mailed or otherwise delivered.

State Hearing Rights

AG's applying for PRC benefits have a right to a State Hearing when they disagree with the action(s) that the county agency has taken. PRC applicants are informed of the right to a State Hearing via the JFS 07501 "Program Enrollment & Benefit Information" booklet at initial application and again via the notices of approval or denial of the PRC application.

Overpayment Collections

Any erroneous payments issued under the PRC Program due to client or vendor error, misrepresentation, intentional program violation, fraud, or agency error constitutes an overpayment. All PRC overpayments are subject to recovery according to established agency collection policy and procedure.

Program Integrity and Control

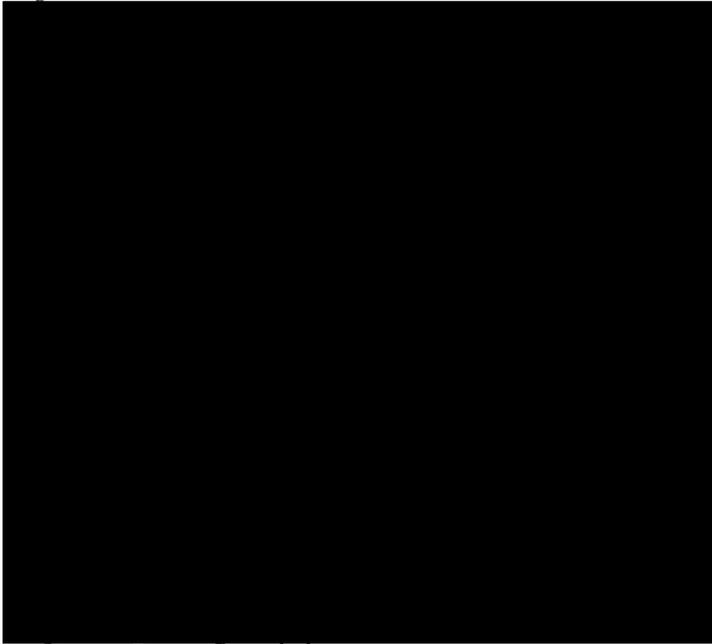
Once eligibility for PRC is established, the LCDJFS director or designee will authorize and generate payment for the assistance, goods, and/ or services. Authorization may occur at any time during a

period beginning on the date that PRC is approved. As long as payment is authorized within the appropriate period, actual payment may be made to vendors according to the procedures in place at the agency. All PRC payments are made by LCDJFS to the vendor or in rare situations to the PRC AG. The County will ensure that all agency policies meet all auditing requirements.

All Programs, including services and benefits, are subject to availability of funds.

This plan may be amended or modified at any time. All amendments will be submitted to ODJFS with an effective date of the addendum.

Lorain County Department of Job & Family Services agrees to implement the PRC Program as provided in this Plan and is certified with effective date of plan revision for 10/01/2015.



County Commissioner

[Redacted Signature]

Date

[Redacted Signature]

Date

[Redacted Signature]

Date

[Redacted Signature]

Date

LORAIN COUNTY DEPARTMENT OF JOB & FAMILY SERVICES PRC SCOPE OF COVERAGE

Effective October 1, 2015 unless otherwise indicated

- Guiding Principles:**
- 1) A PRC-1 Application of Assistance is required, unless otherwise indicated.
 - 2) Some services and/or benefits require employment of at least 30 hours per week at State minimum wage or higher.
 - 3) Participant is responsible to report changes in income or resources, or changes in household members or residence that may affect eligibility.
 - 4) **ALL** programs are subject to availability of funds.
 - 5) **OWF** participants must be attending and completing their assignments on their Self-Sufficiency Contract.

TRANSPORTATION EXPENSES			
PRC Service/Benefit and Guidelines	Fiscal Code	Benefit/Service Limit	Eligibility Criteria
<p>Prepaid Bus Tickets Qualified individuals who are OWF/JOBS or FAET participants. The amount of tickets issued will depend on the hours of OWF participation. Minimum required assignment hours are 10 hours per week.</p> <p>OWF and FAET recipient eligibility based on current OWF/SNAP application.</p>	<p>Code 005 Billing Code 304</p>	<p>Amount as needed. Unusual situations would warrant additional bus tickets with Administrator approval.</p>	<p>Targeted Group OWF and FAET JOBS program AG's participating at a minimum of 10 hours per week in job related education or training activities sponsored by LCDJFS.</p> <p>NOTE: Bus tickets will not be given to OWF and/or FAET participants as transportation to employment</p> <p>The TANF Prepaid Bus Ticket Program meets the first two purposes of TANF:</p> <ol style="list-style-type: none"> 1. To provide assistance to needy families so that the children may be cared for in their homes or the homes of relatives. 2. To end the dependence of needy parents on governmental benefits by promoting job preparation, work and

<p>PRC Service/Benefit and Guidelines</p> <p>VEHICLE REPAIRS</p> <p>PRC funds will be used to provide vehicle repairs for the vehicles of Lorain County families so that the vehicle will be safe and operational.</p> <ul style="list-style-type: none"> Reasonable cost of parts and labor to repair vehicles for clients that have been employed or self-employed for the most recent 90 days OR individuals who are required and currently participating in a work activity through the OWF/JOBS or SNAP Employment and Training program. Services are to be provided at an agency approved vendor. <p>*It is the intent of the program to assist low income families with unexpected vehicle repair expenses, not regular maintenance. Services that would be considered "regular maintenance" (such as oil changes, wind shield wipers, light bulbs, etc) will not be covered unless required as the result of</p>	<p>Fiscal Code</p> <p>Billing Code 242</p>	<p>Benefit/Service Limit</p> <p>Up to \$1000 one-time per application in a 12 month period.</p> <p>Non-recurrent short-term benefits.</p>	<p>Eligibility Criteria</p> <p>200% FPL OR receipt of public assistance (OWF and/or SNAP) Completed PRC-01 application Proof of hire date and income for the 30 days prior to the date of application Proof of current ownership/registration of the vehicle at the time of application. Must have owned vehicle for a minimum of 90 days Proof of current driver's license and auto insurance</p>	<p>marriage.</p> <p>Targeted Group</p> <p>Specified relative w/minor child(ren) and/or unemancipated children Legal custodian/guardian w/minor child(ren) The TANF Vehicle Repair Program meets the first two purposes of TANF: 1. To provide assistance to needy families so that the children may be cared for in their homes or the homes of relatives. 2. To end the dependence of needy parents on governmental benefits by promoting job preparation, work and marriage.</p>
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<p>another necessary repair. Necessary repairs are those needed to ensure the vehicle becomes safe and operational.</p>			<p>Must provide 2 current estimates dated within the last 30 days for the needed service</p>	
SPECIAL PROGRAMS				
<p>PRC Service/Benefit and Guidelines</p> <p>TANF SUMMER YOUTH EMPLOYMENT PROGRAM - SYEP The summer employment program will enable low income TANF eligible Lorain County youth to gain valuable work experience and soft skills while earning a paycheck to help meet basic needs. The program will run from 5/1/2016 through 8/31/2016. Activities to be utilized in the SYEP program include:</p> <ul style="list-style-type: none"> • Payments to employers to help cover the cost of wages at \$9.00 per hour up to 40 hours a week, and fringe benefits excluding health benefits. • Payment for the Work Keys Assessment will not exceed \$50 per individual • Reimbursement of Uniforms, tools, licenses or certifications if paid by the employer, not to exceed \$200. • Job Coach and mentors. • Case Management activities related to the program. • Background checks and finger printing if required by the employer. <p>SYEP participants will not be placed with employers who have individuals on lay-off</p>	<p>Fiscal Code</p> <p>Code 128</p>	<p>Benefit/Service Limit</p> <p>Wages will be paid at \$9.00 per hour.</p>	<p>Eligibility Criteria</p> <p>TANF eligible up to 200% FPL, including OWF and FA recipients.</p> <p>Current recipients of HEAP and/or the 2016 Fuel Fund that meet TANF eligibility requirements.</p>	<p>Targeted Group</p> <p>16, 17, 18 year old youth attending school or just recently graduated</p> <p>19 – 24 year old youth with a minor child</p> <p>LCDJFS has used the BIC, Business Intelligence Channel, to identify potential eligible youth.</p> <p>The program must begin 5/1/2016 but many participants will not be able to begin until their school district has been closed for the school year.</p> <p>The TANF Summer Youth Employment Program meets the first two purposes of TANF:</p> <p>3. To provide assistance to needy families so that the children may be</p>

<p>status.</p> <p>There will be no employment bonus issued to SYEP participants.</p> <p>Lorain County JFS will sub-contract with organizations within Lorain County to operate SYEP.</p> <p>Lorain County JFS will assist with all eligibility determinations with current staff.</p>				<p>cared for in their homes or the homes of relatives.</p> <p>4. To end the dependence of needy parents on governmental benefits by promoting job preparation, work and marriage.</p>
<p>PRC Service/Benefit and Guidelines</p> <p>LCDJFS SUMMER CAMP FOCUS: CAREER EXPLORATION Children between the ages of 8 and 15 years old who live in Lorain County in households with a gross income up to 200% of the federal poverty guidelines (FPG) are eligible for the program.</p> <p>Summer camps will be provided by Boys & Girls Club of Lorain County and Common Ground of Oberlin.</p> <p>Common Ground Effective 6/20/2016 – 7/29/2016 for participants age 8-15.</p> <p>Boys & Girls Club of Lorain County Effective 6/20/2016 – 8/12/2016 for participants age 8-15.</p> <p>All households must complete a special PRC-01 camp application. Households not receiving OWF or SNAP food benefits from LCDJFS will need to provide all supportive verification, including income, to determine PRC eligibility.</p>	<p>Fiscal Code</p> <p>Billing Code 254</p>	<p>Benefit/Service Limit</p> <p>This program is limited to the availability of funds</p>	<p>Eligibility Criteria</p> <p>TANF eligible up to 200% FPL, including OWF and FA recipients.</p> <p>Current recipients of HEAP and/or the 2016 Fuel Fund that meet TANF eligibility requirements.</p> <p>Income from specified relatives, kinship caretakers, foster parents, legal guardians and custodians will be excluded from the household total income for purposes of determining eligibility for the PRC summer camp program.</p> <p>Applicants must complete the PRC-01 CAMP application.</p>	<p>Targeted Group</p> <p>8 to 15 year old youth who meet TANF eligibility requirements and reside in a household with a gross income up to 200% FPG in Lorain County.</p> <p>LCDJFS has used the BIC, Business Intelligence Channel, to identify potential eligible youth.</p> <p>The TANF Summer Camp Program meets the first two purposes of TANF:</p> <ol style="list-style-type: none"> To provide assistance to needy families so that the children may be cared for in their homes or the homes of relatives. To end the dependence of needy parents on governmental benefits by promoting job preparation, work and marriage.

PRC Service/Benefit and Guidelines	Fiscal Code	Benefit/Service Limit	Eligibility Criteria	Targeted Group
<p>LCDJFS TANF SCHOOL UNIFORM / SHOE / JACKET PROGRAM. Using TANF money, LCDJFS summer camp participants age 8 to 15 years old will receive school uniforms, shoes and jackets.</p> <p>The maximum payment for each child will be \$350.</p> <p>The vendor will be Boys & Girls Club of Lorain County.</p> <p>Recipients age 8 to 15 will have automatic eligibility based on their enrollment in the LCDJFS funded summer camp program.</p> <p>The program will run from 7/1/2016 through 9/16/2016.</p> <p>The service is provided by Boys & Girls Club of Lorain County.</p>	<p>Billing Code 254</p>	<p>This program is limited to the availability of funds</p>	<p>LCDJFS summer camp recipients age 8 to 15 years old who live in Lorain County in households with a gross income up to 200% of the federal poverty guidelines.</p> <p>Children participating in the LCDJFS summer camp program will have automatic eligibility for the TANF School Uniform / Shoe / Jacket program.</p>	<p>Children age 8 to 15 years old that are participating on the summer camp program funded by LCDJFS.</p> <p>The TANF School Uniform / Shoe / Jacket Program meets the first purpose of TANF:</p> <ol style="list-style-type: none"> To provide assistance to needy families so that the children may be cared for in their homes or the homes of relatives.

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