



PREVENTION & RETENTION & CONTINGENCY PLAN

Developed by: *Mercer County Department of Job and Family Services*
220 W. Livingston St., Suite 10
Celina, Ohio 45822
Effective May 1, 2016

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INTRODUCTION

Effective May 1, 2015, pursuant to ORC Sections 5108.01 through 5108.10, the Mercer County Department of Job and Family Services (MCJFS) will operate Prevention, Retention & Contingency (PRC) service program pursuant to this revised plan within Mercer County, Ohio.

Any Assistance Group, as defined below, meeting eligibility criteria may receive short-term, customized goods or services as determined by MCJFS. This PRC Plan may not conflict with the Title IV-A State Plan, Ohio Revised Code, or federal law. (see Ohio Revised Code Section 5108.02.)

The PRC service program provides for flexible funding of services identified as locally needed so long as those services meet the definition of non-assistance and are *directly* related to the four purposes of the Temporary Aid to Needy Families (TANF) program which are as follows:

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

The PRC service program is not to be viewed or operated as an entitlement program. The intent and goal of the PRC services program is to overcome immediate barriers to achieving or maintaining self-sufficiency, employment and personal responsibility, and preventing the need for public assistance. PRC services may also be provided to meet a need which, if not satisfied, threatens the safety, health or well-being of one of the members of the Assistance Group.

Eligibility for PRC services and benefits is dependent upon the AG's demonstration and verification (in a manner acceptable to MCJFS) of the need for financial assistance. Any person(s) found to have made false statements on their PRC application or to have received PRC services fraudulently, may be prosecuted for fraud and **will be** required to repay any assistance/services received through the MCJFS PRC program.

Nonrecurring, short-term benefits (of tangible value) address discrete crisis situation and do not provide for needs extending beyond 4 months. These nonrecurring benefits may encompass more than one payment per year, as long as the payment provides short-term relief and addressed a discrete crisis situation rather than meeting ongoing or recurrent need. All payments must be authorized within 60 days of application for PRC.

PRC services (of no tangible value to the recipient) may be provided on an ongoing basis.

DEFINITIONS

The following are definitions of terms used in this PRC plan.

Assistance Group (AG)	An AG is composed of one or two adult caretakers and their minor child(ren), including step-child or natural children, for whom they have assumed responsibility. The AG must include at least one minor child or a woman whose pregnancy is medically verified or a noncustodial parent who has a legal obligation to pay child support for a child living in Ohio to be a valid AG for PRC purposes.
Budget Period	30 days prior to the date of application.
Contingency Services	Services provided with the intent to meet an emergent need, which threatens the health, safety, or well-being of one or more of the AG members.
Family	For Family Preservation and Reunification services, the family is defined as the natural or adoptive parents, or legal custodian, of children who are in danger of being removed from their home, or require assistance to be reunited with their family.
Good Cause	For PRC purposes as one or more of the following: <ul style="list-style-type: none">• Discrimination by an employer based on age, race, sex, color, handicap, religious beliefs or national origin• Work demands or conditions that render continued employment unreasonable, such as not getting paid to work when promised.• Employment that has become unsuitable because the wage is less than minimum wage, there is a strike or lockout, the risk to the employee's health or safety can be documented, or the employee has documentation from a physician that (s)he is not physically or mentally fit to perform the employment.• A physician documented illness of the employee or another member of the assistance group requiring the presence of the employee.• A documented household emergency. In most cases a family member must be at risk of harm, such as eviction/foreclosure notices, medical issues, documented domestic violence, etc.

Gross Income	For the purpose of PRC, gross income includes any income earned or unearned by a member of the assistance group who is not a minor and enrolled in or attending elementary or secondary school. There are certain types of income and resources excluded in determining financial eligibility for PRC benefits and services as referenced in Ohio Administrative Code 5101:1-24-20. Income excluded includes Child Support payments subject to assignment to the State of Ohio, all income that is federally excluded in the determination of eligibility for federal needs based programs, including certain drug discounts and transitional assistance under Medicare and certain Veterans Administration benefits for natural children of female Vietnam veterans.
Minor Child	An individual under age eighteen (18), or eighteen but not yet nineteen (19), and is a full-time student in a secondary school or its vocational or technical equivalent.
Prevention Services	Services provided with the intent to divert the AG from ongoing cash assistance. Individuals applying for or receiving OWF cash assistance are not eligible for Prevention Services
Retention Services	Services provided with the intent of allowing an employed, adult caretaker in the AG to maintain earned income and employment.
Year or Multiyear Period	For PRC benefit limitation purposes, the year or multiyear period begins upon the first date of approval of relevant PRC benefits, including those issued by other states as well as other Ohio counties.

PRC services have no direct monetary value to an AG and do not include implicit or explicit support. PRC services are short-term assistance which is limited to the amount needed to meet the situation. All payments must be authorized within 60 days of application for PRC.

GENERAL RESTRICTIONS

The AG must make every effort to explore the availability of other resources in the community, whether self-initiated or by a referral from the MCJFS. The AG is required to apply for and utilize any program, benefit, or support system which may reduce or eliminate the emergent need. Failure to explore community resources will result in a denial of PRC services.

If the community, the AG resources and PRC services cannot meet the emergent need, then Contingency PRC services will not be authorized.

PRC services are not available for medical bills.

Authorization of services for one AG does not constitute a precedent for any other AG as PRC services are not an entitlement.

All PRC services are contingent upon the availability of funds.

An application for, or receipt of OWF cash assistance, renders the AG ineligible for Prevention services.

The following individuals are not eligible for PRC services:

- ✦ Fugitive felons and probation/parole violators
- ✦ Persons not U.S. citizens. In order to receive PRC benefits and services at least one member of the PRC assistance group must be a citizen of the United States or a Qualified Alien as defined in Rule 5101:1-2-30 of the Ohio Administrative Code.

The income of these individuals is included in calculating the AG's income. Other members of the AG may be eligible as long as there is an eligible adult caretaker and minor child.

The following situations render the entire AG ineligible for PRC services:

- ✦ Any AG containing an individual with an outstanding IPV/fraud claim or disqualification penalty in any benefit program (OWF, PRC) is ineligible to participate in the PRC Program. Ineligibility continues until the cost of the IPV fraudulent claim is repaid, with the exception of Employment Related Expenses, Child Welfare Services and Administration, and TANF Summer Youth Employment Program.

SHELTER ASSISTANCE

The PRC program has funds available to assist an AG with Shelter Expenses. Requests for assistance of shelter expenses are limited to those actually required to meet the emergent need. Shelter Expenses may be utilized no more than twice in a 1 year period, subject to the \$450 limit per 1 year period. Assistance with shelter expense meets TANF purpose #1.

Services

Assistance with rent requires a written notice to leave the premises from the landlord, unless moving into HUD housing. Emergency Shelter is only for an individual(s) living in a domestic violence shelter, to allow these individuals to move from the shelters.

Requests for assistance with utility expenses require a shut-off notice. Utility bills will not be paid for AGs who are eligible for subsidized payments, under PIP program (East Ohio Gas and Dayton Power and Light Company). AG's also do not qualify for assistance with heating bills during the dates of operation of the HEAP program, including E-Heap, unless written verification is received from the agency operating HEAP that the AG is ineligible for HEAP because AG has already received HEAP assistance in the current heating season.

Application for Services: The AG will apply for shelter assistance by submitting to MCJFS the *Long Form Application* and completing a face to face interview. A Long Form Application is attached hereto in the Appendix.

Verification: The AG is required to verify residence in Mercer County, Ohio, the need for PRC services, gross income of the entire AG, and demonstration of the resources and liquid assets of the entire AG.

Liquid assets are those resources, over and above \$200.00, which are in cash or payable in cash on demand. For PRC purposes, liquid assets are those which can be converted to cash within 30 calendar days so that funds are available to help meet the need. The most common types of liquid assets are cash on hand, savings accounts, checking accounts, certificates of deposit, stocks, bonds, mutual funds, trust funds.

The AG is responsible for supplying all verifications in a manner acceptable to MCJFS. The PRC application will be denied 30 days after application if the AG does not supply the required verifications. MCJFS has the flexibility to accept applicant's statement as verification on a case-by-case basis when reasonable verification efforts by MCJFS and applicant have been exhausted.

Income: For shelter services to be authorized, the AG's income must be at or below 133% of the federal poverty level.

Additional Restrictions: The maximum Shelter Expenses benefits can not exceed \$450 per 1 year period. Also the number of occasions of receipt of PRC Shelter Expenses can not exceed two per 1 year period. This 1-year period begins at the time PRC benefits for the AG are initially approved. For reporting purposes, the benefit will be divided and attributed equally to all adults in the AG.

- ✦ An individual or assistance group ineligible for other assistance programs due deliberate non-compliance with the terms of their assistance.

The income of these individuals is included in calculating the AG's income. Other members of the AG may be eligible as long as there is an eligible adult caretaker and minor child.

The following situations render the entire AG ineligible for PRC services:

- ✦ Refusal, without good cause, on the part of an adult caretaker to accept a bona fide job within 90 days prior to the PRC application.
- ✦ Terminating employment, or being terminated from employment, without good cause by an adult caretaker within 90 days prior to the PRC application.
- ✦ Under a current OWF or FSET sanction or penalty due to failing to comply with program regulations or policies.
- ✦ Any AG containing an individual with an outstanding overpayment is ineligible for PRC services if the individual has not established (as per Mercer County JFS guidelines) and/or complied with a current repayment agreement (if there is non-compliance with current repayment agreement, AG is ineligible until the overpayment is paid in full). This includes any and all identified overpayments: Disability Assistance, OWF, PRC, Food Assistance, Medicaid and Child Care.

EMPLOYMENT RELATED EXPENSES

PRC services are available to eliminate barriers preventing an AG from securing or maintaining employment. There is no limit on the number of times per year that an AG may apply and receive assistance, subject to the annual benefit limits. Employment related expenses meet TANF purpose #2.

Transportation Expense: Transportation continues to be a concern to many AGs in Mercer County, Ohio. Mercer County, being a rural area, has no mass transit or public transportation available. To assist with transportation for employment, PRC services address the following needs:

Fees: An eligible AG may receive assistance with vehicle insurance, vehicle payments, driver's license reinstatement fees* up to \$400 per year.

Fuel & Travel Expense To and From Employment: One time assistance is available to pay for JARC co-pay or LACCA transport fee up to \$450 or \$100 to any outside provider, including may include a cab company, busing company, or a relative or an acquaintance.

After 30 days of employment, continuing assistance is available for fuel expenditures in the form of vouchers up to \$100 per month, with a limit of \$600 per year.

Vehicle Repair: Assistance is available to qualified AGs for vehicle repairs up to \$3,000 per AG for one 36 month time period provided the vehicle is the only available vehicle in the household. Requests for vehicle repair shall be limited to the lowest of three quotes of a business registered to perform vehicle repair with the Secretary of State and have a sales tax reporting number from the county auditor. Vehicle repair excludes motorcycles.

Employment-Related Accessories: Assistance is also available for safety related and required shoes, uniforms, and equipment necessary for employment up to \$250 per year.

Application for Services: The AG will apply for employment related assistance by submitting to MCJFS the *Short Form Application* and a face-to-face interview. A Short Form Application is attached hereto in the Appendix.

Verification: The AG is required to verify residence in Mercer County, Ohio and the need for PRC services, gross income of the entire AG, and proof of current and substantial employment. Substantial is defined as employment, other than self-employment, being 30 hours per week or more on the job site. Self-employment does not qualify for PRC services. Any PRC payments under this program for vehicle repair, insurance and vehicle payment shall require proof of a valid driver's license and vehicle ownership.

The need for continuing assistance for fuel shall be verified by submission of all pay stubs on a monthly basis.

The AG is responsible for supplying all verifications in a manner acceptable to MCJFS. A PRC application will be denied 30 days after application if the AG does not supply the required verifications. MCJFS has the flexibility to accept applicant's statement as verification on a case-by-case basis when reasonable verification efforts by MCJFS and applicant have been exhausted.

Income: For employment related services to be authorized, the AG's income must be at or below 200% of the federal poverty level for employment assistance.

*Reinstatement fees are limited to one time only and shall not include fees due to OVI or traffic fatalities, or equivalent.

PHYSICAL DISASTER SERVICES

For **PHYSICAL DISASTER SERVICES** an ADDENDUM to this plan will be written for each disaster occurrence. This program meets TANF purpose or goal #1.

CHILD WELFARE SERVICES AND ADMINISTRATION

The PRC Program may be used to provide assistance to a family involved with the child protective services system. A county may design its program to help alleviate a family crises that could lead to the removal of children from their home, or to help a family so that the children can be safely returned to their family. This program meets TANF purpose #1, #2, #3.

Definitions

Preservation/Reunification Assistance Group (AG):

The AG must include at least one minor child who resides with natural or adoptive parents, or legal guardian/custodian.

- ✦ There must be a current Children Service case for this child.

Child Only Assistance Group (AG):

A minor child removed from the home of his parents shall constitute a PRC Assistance Group of one for the purposes of this service.

- ✦ The child must be placed by Mercer County Job & Family Services in a kinship home, foster home, group home or residential facility.
- ✦ There must be a current Children Service Case for this child.

Eligibility

Application:

Child Welfare PRC form will be completed by a legal guardian, his/her designee, or a MCJFS representative applying on behalf of a child for whom Mercer County Job & Family Services has legal custody.

Income:

Families with incomes up to 200% or less of the federal poverty level are eligible for Child Welfare PRC Services.

Verification Requirements:

The AG is responsible for supplying all verification in a manner acceptable to MCJFS. The PRC application will be denied 30 days after application if the AG does not supply required verifications.

- ✦ Mercer County Residence
- ✦ Income of the entire AG

Determination:

MCJFS will approve or deny any application in a fair and equitable manner within 30 days of receipt of application. Approval will be good for 6 months from the date of application.

There is no annual limit to the total monetary value of services provided. The

Children Service caseworker and the Social Service Administrator will meet to consider expenditures in the excess of regular PRC guideline lines and must have Director approval. (Subject to availability of funding)

Programs

Family Preservation Services:

The objective of family preservation services is to preserve the family as a unit and prevent unnecessary placement of the children in alternative living arrangements. Family preservation services augment and expand the protection, supervision, care, and support that are provided through the primary family unit. These services provide information, referral and supportive services for parents, relative caregivers, legal guardians or court-ordered legal custodians responsible for the day-to-day care of a minor child residing with the caregiver.

Reunification Services:

These services target families with children in foster placement whose prospects for successful reunification are good. Reunification services include an array of supportive services needed by the family to attempt reunification, including supervised visitation in the home by the child, trial placement with the family and whatever home-based services are required to facilitate permanent reunification.

Child Only Services:

These services target children placed by MCJFS in a kinship caregiver home, foster home, group home or residential facility. These services are used to maintain the placement.

Ongoing Services

The services/activities will be provided/funded at MCJFS's discretion and is subject to the availability of funds.

The services are designed to support the betterment of the mental and emotional needs of a family. Services may include (but aren't limited to): Diagnostic/Assessment services, including those for substance abuse, Case Management, Day Treatment, Home Based Services, Parent & Child Educational Services, Mentoring Services, Post-finalization Adoption Services, Transportation, Clothing, Youth Coaching, Behavioral Support Services, Emergency Food, Counseling Services (excluding medical expenditures, or not covered by Medicaid), Mediation Services, Kinship Meetings and Supplies, Pest Control, Transitioning Services, Enrichment and Support Programs, Respite Care, and all other hard or soft services which, in the judgment of the Director or designee, prevents the need to remove a child from the home, or to facilitate the return of a child to home.

Contingency Services

If the assistance group is currently active with Children Service Unit, very focused and intensive services will be required to create or maintain family stability. Services deemed necessary will be provided. These services may include (but aren't limited to):

- ✦ Personal Expenses: Clothing, hygiene products, child restraint seats
- ✦ Home repairs: purchase or repair of furnace/water tank, repair of walls, roofing, plumbing, flooring
- ✦ Purchase of appliances- stoves, refrigerators, air conditioner, fans, washer or dryers.
- ✦ Furniture
- ✦ Household items- bedding, vacuum cleaner, brooms, etc.
- ✦ Rent, Utilities or Emergency Housing

TANF SUMMER YOUTH EMPLOYMENT PROGRAM

Subject to available funding and rules from ODJFS, including Family Assistance Letter #152 dated February 10, 2016, attached hereto, and any subsequent Family Assistance Letters and ODJFS communications; and the rules herein, MCJFS will operate the **TANF Summer Youth Employment Program**. This program meets TANF purposes or goals #1 and #2.

Services: Services provided include soft skills training, job placement, and job coaching. Allowable costs are: payments of wages (not to exceed \$10.00 per hour) to youth participants and fringe benefits (except health care benefits), including Workers Compensation expenses and FICA for period the program is authorized to operate (May 1, 2016 to August 31, 2016); payments to third parties to operate the program; recruitment and development of employers for the program; work related items, such as uniforms, tools, licenses or certifications; case management activities related to the program; job coaching and mentors; direct supervision and training costs; work clothing if it is necessary for employment at the specific job placement; and transportation costs to and from the work site.

No youth employment can begin in this program before May 1, 2016 and all youth employment in this program will terminate before August 31, 2016.

Application for Services: The AG will apply for the TANF Summer Youth Employment program by submitting to MCJFS the *Short Form Application*. A Short Form Application is attached hereto in the Appendix.

Determination of Eligibility: Youth ages 14 to 24 years, in AG's with family incomes at 200% or less than the federal poverty level. The youth must be in school (youth may be 18 if they are a full time student in a secondary school); individuals ages 14-24, as long as they are in a needy family that also has a minor child; or individuals ages 14-24 who have minor child and are in a needy family. Youth in the temporary or permanent custody of a Public Children Services Agency (PCSA) who are placed in a licensed foster care setting, or are in the temporary or permanent custody of a caretaker who is eligible for Ohio Works First benefits, that are between the ages of 14 to 17 years of age or 18 years of age if they are a full time student in a secondary school may be served under the TANF Summer Youth Employment Program.

Income: Individuals with incomes up to 200% or less of the federal poverty levels are eligible for TANF Summer Youth Services. Eligibility for Food Assistance in the month of application will verify income.

SEEK WORK PROGRAM

Subject to regulations by the ODJFS, and, if adequate funding for the program is available, the Seek Work program will be approved for operation. Program operation cannot begin or continue at any time without an approved valid contract between MCJFS and the provider of services. MCJFS is under no obligation to offer these services and may discontinue Seek Work at any time.

This program serves non-custodial parents with a court-ordered obligation to pay child support who are referred by Mercer County Child Support Enforcement Agency (CSEA) to attend the SEEK WORK Program through the judicial system and who are in need of employment services.

Verification of a non-custodial child support order involving a minor child may be verified through contact with the CSEA. This contact will be accepted as application for services under the SEEK WORK program.

The goal of the Seek Work program is self-sufficiency for program participants, so that participants can properly provide financial support to their children. The program meets TANF goal or purpose # 2 by ending the dependence of needy parents on benefits by promoting job preparation, for the non-custodial parent. The Seek Work program can serve non-custodial parents who are not Mercer County residents as long as they reside in Ohio and the minor child (ren) involved resides in Mercer County.

Allowable PRC services under TANF for non-custodial parents may include, but are not limited to:

- ✦ Employment-related expenses, financial management services, job search, job placement, education, and job training services;
- ✦ Counseling, including a broad array of services such as parenting classes, mediation services, premarital and marriage counseling, activities to promote parental access and supervision, responsible fatherhood initiatives, and increasing the capacity of fathers to provide emotional support for their children;
- ✦ Paternity establishment counseling;
- ✦ Anger management; and
- ✦ Access and visitation mediation.

MCJFS RESPONSIBILITIES

MCJFS will approve or deny an application in a fair and equitable manner within 30 days of receipt of the application.

Eligibility for PRC will be evaluated on a case-by-case basis, with MCJFS retaining final authority to approve or deny the application.

If the applicant expresses a desire to apply for other programs/services, MCJFS will take the application and determine eligibility according to its usual procedure. Applicants will be given all information necessary for them to make an informed decision regarding PRC services and other MCJFS programs and services. MCJFS will determine eligibility for PRC services within five (5) working days of receiving all required verifications from the applicant.

If the applicant has not supplied the verifications within thirty (30) days of submitting the application, PRC services will be denied. As required by the ODJFS, MCJFS will use the CRIS-E system to register and document PRC services. All forms, documents, verifications and case notes will be kept in an AG file. MCJFS will mail, or otherwise deliver, a notice of approval, the ODHS 4074, Notice of Approval of Your Application For Assistance, or denial, the ODHS 7334, Notice of Denial of Your Application For Assistance, for PRC services.

The MCJFS Director, Ohio Works First/PRC Supervisor(s) or other designee of the Director will authorize payment for services from recognized community vendors. At a minimum, the vendor must be able to provide a federal employer identification number. MCJFS will use prudence in selecting a vendor in regards to the cost of services. MCJFS will authorize PRC payments via relief supply orders or warrants payable to vendors or applicants. All payment processing procedures will meet acceptable auditing requirements by the Mercer County Auditor, ODJFS and the Auditor of the State of Ohio.

MCJFS, in accordance with section 329.051 Revised Code, must make a voter registration application available to persons applying for or participating in the PRC program. This section applies to both county agencies and those entities with whom MCJFS contracts. Third party providing agencies can provide the completed voter registration forms to MCJFS who in turn should provide them to the Board of Elections.

At the time of application, individual must be informed in writing of their right to request a state hearing. This can be done by providing a copy of the JFS 04059, "Explanation of State Hearing Procedures." The applicant must have the opportunity to be had in a state hearing or an administrative appeal. Pursuant to Section 5108.09 Revised Code, PRC hearing decisions are based upon the county PRC plan in effect at the time of the adverse decision, and MCJFS must provide a copy of the PRC plan and all amendments to the hearing officer.

The Mercer County Department of Job and Family Services agrees to implement the Mercer County Plan as written herein.

[Redacted Signature]

[Redacted Date]

Mercer County Department of Job & Family Services

The Board of Mercer County Commissioners certifies that the Mercer County Department of Job & Family Services complied with Chapter 5108 of the Ohio Revised Code in adopting the statement of policies of the Mercer County Prevention, Retention and Contingency Plan.

[Redacted Signature]

[Redacted Date]

Mercer County Board of Commissioners

Date

[Redacted Signature]

[Redacted Date]

Date

[Redacted Signature]

[Redacted Date]

Mercer County Commissioner

Date

Date: APRIL 28, 2016

In the: THE MERCER COUNTY COMMISSIONERS APPROVING REVISIONS TO THE PRC
matter of: PLAN AS REQUESTED BY THE DEPARTMENT OF JOB & FAMILY SERVICES

The Board of County Commissioners of Mercer County, Ohio met in regular session on the 28th day of April, 2016, at the Office of the Mercer County Commissioners with the following members present: Mr. Greg Homan, Mr. Jerry Laffin, and Mr. Rick Muhlenkamp. Also, present was Mrs. Kim Everman, Clerk / Adm. of the Board.

Mr. Laffin moved the adoption of the following:

RESOLUTION #16-468

WHEREAS, in accordance to Resolution #16-45 dated January 12, 2016, Commissioners Journal #112, the Board of Mercer County Commissioners previously approved revisions to the Prevention, Retention and Contingency (PRC) Plan of the Department of Job and Family Services; and

WHEREAS, Director Angela Nickell is requesting that the Mercer County PRC Plan be further revised effective May 1, 2016; and

WHEREAS, plan revisions include but are not limited to: a) TANF Summer Youth Employment Program, b) Employment Related Expenses, and Child Welfare Services; and

WHEREAS, a copy of the revised Prevention, Retention and Contingency (PRC) Plan is attached and on file in the Mercer County Commissioners' Office; it will be maintained until no longer of administrative value; Now,

THEREFORE BE IT RESOLVED, that the Board of County Commissioners of Mercer County, Ohio hereby approves the aforementioned revisions to the PRC Plan developed by Job and Family Services and ratifies the PRC Plan effective May 1, 2016; Be It Further

RESOLVED, that the Board of Mercer County Commissioners hereby certifies that Mercer County Department of Job & Family Services has complied with Chapter 5108 of the Ohio Revised Code in adopting the statement of policies of the Mercer County Prevention, Retention and Contingency Plan.

Mr. Muhlenkamp seconded the resolution and the roll being called upon its adoption the vote resulted as follows:

Mr. Muhlenkamp, Yes; Mr. Laffin, Yes; Mr. Homan, Yes;

ATTEST:


Clerk / Adm. of the Board

cc: JFS