

# **Marion County Job & Family Services**

## **Prevention Retention and Contingency Plan**

**Effective – October 01, 2015**

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# Marion County Job & Family Services

## Prevention, Retention & Contingency Plan (PRC)

### Purpose

The Marion County Job and Family Services (MCJFS) PRC Program is designed to assist low to moderate income families who may or may not currently be receiving or desire OWF cash assistance. It is a tool for our community to use to develop strategies and programs to encourage families to attain and retain employment, upgrade vocational skills, prevent dependency, promote family stability and enhance economic self-sufficiency. It is also designed to reduce or eliminate specific emergent need(s) that threatens the health or safety of a family and to stabilize their situation. Benefits and services will be provided to the extent they meet the federal definition of "Non-Assistance" per 45 CFR260.3 I (b).

### Non-Assistance Such as, But Not Limited To:

- Nonrecurrent, short-term benefits that:
  - are designed to deal with a specific crisis situation or episode of need;
  - are not intended to meet recurrent or ongoing needs; and
  - will not extend beyond four months.
- Supportive services such as transportation provided to families who are employed or seeking employment
- Work subsidies (i.e., payments to employers or third parties to help cover the costs of employee wages, benefits, supervision, and training);
- Refundable earned income tax credits;
- Contributions to, and distributions from Individual Development Accounts (IDA);
- Services such as counseling, case management, peer support, neutral drop off /supervised visitation, child care information and referral, transitional services, job retention, job advancement, and other employment-related services that do not provide basic income support; and
- Transportation benefits provided under a Job Access or Reverse Commute project to an individual who is not otherwise receiving assistance.

## **Funding**

The PRC program is funded entirely by Prevention Retention and Contingency (PRC) and designated TANF funds received from the Ohio Department of Job & Family Services (ODJFS). The PRC program establishes the operational parameters for the use of PRC and designated TANF funds in Marion County. The PRC Plan is created pursuant to ORC Chapter 5108.

## **Goals for the PRC Program**

The following goals, identified as the four purposes of the TANF Program per 45 CFR260.20, have been adopted by MCJFS:

1. To provide assistance to needy families so that children may be cared for in their own home or in the home of a relative;
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; and
4. To encourage the formation and maintenance of two-parent families.

**NOTE:** Goals 3 and 4 are not limited to just economically needy families. Some services under goals 3 and 4 are also available to non-needy families; however, they may have to be tracked differently. In some situations MOE money cannot be used (only federal TANF money may be used); this would require MCJFS prior approval. For some services provided under goals 3 and 4 an application and/or the economic need standard may be waived, with prior approval from MCJFS. Specific information must still be collected on those served and may require the use of another MCJFS authorized data collection system.

**NOTE:** Certain services under goals 3 and 4 may be provided to childless couples and individuals. Prior approval is required from MCJFS.

## **Eligibility Process**

Eligibility for PRC Benefits and Services is conditioned upon a PRC Eligible Assistance Group's (AG's) demonstration and verification (when required) of their families presenting emergent or non-emergent need and whether MCJFS determines: (1) the family has, at minimum, stated a plan of action and (2) providing PRC benefits and services will substantially satisfy their presenting need. The basic tenet in dealing with a crisis that threatens the health or safety of a family is to **first** eliminate the emergent need.

PRC assistance is only available to AG's that have not received the same benefit or service beyond the monetary caps, occurrence limits, time limits and other qualifying conditions established by the plan narrative and the attached **“Case Manager Tool - PRC Schedule of Benefits, Limitations & Special Conditions”** or the **“PRC Services & Benefits Contracted Third Party or MCJFS Project.”**

The AG must satisfy the Economic Need Standard established for each specific benefit or service in the **“Case Manager Tool - PRC Schedule of Benefits, Limitations & Special Conditions”** or the **“PRC Services & Benefits Contracted Third Party or MCJFS Project.”**

The economic need standard may be waived for specified services provided under TANF goals 3 and 4, with approval from MCJFS.

The AG's use of their liquid resources will only be implemented when mandated by the funding/regulatory source. Such conditions will be appended to this plan when applicable.

Community resources may be considered in meeting their needs.

The PRC eligibility determination process consists of additional elements which are defined and described in the following body of this plan.

## **Failure to Prevent the Occurrence of the Emergent Need - Denial of Request**

Denial of the request for assistance may be appropriate in situations where it can be documented by the processing case manager that no attempt has been made to prevent the occurrence of the emergent need and the Assistance Group can present no evidence that they have experienced any extraordinary circumstances or expenses; such as, loss of employment income or loss of unearned income or increase in household expenses. Situations in which no attempt to prevent the occurrence of the emergency may include: a pattern of making no payment toward a financial obligation with the knowledge that making a minimal payment would prevent the occurrence of the emergency. Additionally, the processing case manager must be able to show the Assistance Group had discretionary income available to make payment and non-payment was caused by the member's failure to make these payments, prior to the denial of PRC under this section.

Consideration must be given to situations where housing and utility costs exceed the Assistance Group's income; however, that alone cannot be the reason for the denial of PRC under this section.

A denial of PRC benefits or services under this section is not intended to be made routinely or without careful consideration of the Assistance Groups past history as documented in the running record. A denial under this section requires supervisor approval. The PRC program is intended to assist families meet infrequent emergencies of a legitimate nature that could not have been avoided by the means available to the Assistance Group.

## **Exploration of and Referral to Other MCJFS Administered Benefits or Services**

Anyone applying for PRC benefits or services will receive appropriate information (and referrals when warranted) for: Medicaid, Food Assistance, Child Care and other MCJFS administered programs that provide benefits and services that could assist the family to successfully transition to economic self-sufficiency.

## **Community Resources**

The availability of resources in the community may be explored.

Consideration may be given to any known and unconditionally available community resource which may substantially satisfy or eliminate the emergent or presenting need.

Additional consideration must be given to the timeliness and accessibility of any community resources for an emergent need that threatens the health or safety of a family.

MCJFS personnel determining eligibility for PRC must be aware of community resources that may be utilized to help meet customers' needs. The PRC application provides a section where an AG may indicate their attempts to locate and utilize community resources.

## **Right To Request Alternate Service Provider**

An applicant for or recipient of PRC may object to the religious nature of an agency providing PRC services. Under the provisions of Charitable Choice an assistance group must be provided with an alternate provider within a reasonable amount of time should they object to the faith-based provider.

## **Benefits, Services, Time Limits, Monetary Caps, Liquid Resource Caps**

The allowable benefits and services, and where applicable; the monetary caps, liquid resource caps, time limits and other specific conditions are identified in the attached **“Case Manager Tool - PRC Schedule of Benefits, Limitations & Special Conditions”** or the **“PRC Services & Benefits Contracted Third Party or MCJFS Project.”**

There is not a maximum PRC cap for the aggregate dollar amount of benefits and services issued for an individual or for Assistance Group.

There are both universal and specific limits established for each benefit and service. Some apply to an individual and some apply to the Assistance Group. The limits and conditions have been established to operate this plan within the Federal and State Guidelines. Limits and conditions are stated in terms of (1) a dollar maximum, (2) an occurrence maximum, (3) a situational specific element, (4) a specific period of time, or (5) a combination of these elements. When a time limit is to be applied you begin by looking back the specified period of time from the date of application to calculate (first) what benefits or services, if any, were issued.

## Ineligible Assistance Groups and Individuals

### **The Following Assistance Groups and Individuals Are Ineligible By Federal or State Statute:**

- No **benefits or services** to an Assistance Group or family without a minor child. Exception: pregnancy prevention for young adults and childless couples.
- No **benefits or services** to a single Individual unless pregnant. (The unborn child of an expectant mother is considered a minor child.). Exception: pregnancy prevention for young adults and childless couples. Exception: non-custodial parent with their minor child residing outside of their home that meets the non-custodial parent qualification test in this plan.
- No **benefits or services** to an Individual who is not a citizen of the United States or a qualified alien. (Section 5506 (d) of Public Law 105-33)
- No **benefits or services** to Assistance Group with a member who fraudulently received assistance under PRC/BOOST or ADC/TANF/OWF, until **full** repayment has been made. Also includes PRC/BOOST or ADC/TANF/OWF Intentional Program Violations (IPV's). (ORC 5101.83)
- This condition removed - Effective with TANF rule changes April 1999
- This condition removed - Effective with TANF rule changes April 1999

## **Assistance Group**

For the purposes of the MCJFS PRC Program an eligible Assistance Group is defined as a household unit consisting of a minor child **(A)** who lives with a custodial parent, legal guardian **(C)** (ORC 2151); **or** legal custodian **(C)** (ORC 2111); **or** specified relative **(B)** (ORC 5107.01). No household unit is eligible unless they have a qualifying minor child. A pregnant adult individual may be considered a household unit. Exceptions do exist for the minor child requirement and are duly noted.

**(A)** Minor Child is defined as:

1. An individual who has not attained age 18 or
2. An individual who has not attained age 19, and is a full-time student in a secondary school or in the equivalent level of vocational technical training or home school (ORC 5108.01), or
3. The unborn child of an expectant mother

**(B)** "Specified Relative" means the following individuals who are age eighteen or older:

1. The following individuals related by blood or adoption:
  - a. Grandparents, including grandparents with the prefix "great," "great-great," or "great-great-great"
  - b. Siblings;
  - c. Aunts, uncles, nephews, and nieces, including such relatives with the "great," "great-great," "grand," or "great-grand;"
  - d. First cousins and first cousins once removed.
2. Stepparents and step siblings;
3. Spouses and former spouses of individuals named in **(A)** or **(B)** above.

**(C)** There is an outstanding issue as to whether the federal statute permits the use of TANF funds for children not residing with parents or caretaker relatives. If it is determined that TANF funds cannot be used for children residing with non-related individuals, the children residing with custodians and guardians will be ineligible for PRC.

**NOTE:** The PRC definition of "household unit" shall be used to determine Assistance Group size; however, MCJFS may exclude anyone other than; mother, father, stepmother, and stepfather, of a minor child and the minor child's minor siblings, including stepbrother, stepsister, half brother and half sister, in order to qualify the family for PRC.

**NOTE:** TANF/PRC never severs a relationship, even after a divorce or at death.

## **Noncustodial Parents**

A noncustodial parent who does not have their minor child currently residing in their household unit may meet the minor child requirement; if **(a)**, their minor child who resides outside of their home lives in Ohio and **(b)**, they have a current child support order and **intent** to meet his/her obligations. Additionally, the noncustodial parent must meet the following conditions:

1. The PRC benefits/services must assist the noncustodial parent in **being able to meet** their child support obligations. Questionable situations will be decided upon consultation with the appropriate CSEA Case Manager or Team Leader.
2. The noncustodial parent resides in Marion County.
3. The noncustodial parent is otherwise eligible.
4. The noncustodial parent is limited to only those benefits and services specifically identified in the attached **“Case Manager Tool - PRC Schedule of Benefits, Limitations & Special Conditions”** or the **“PRC Services & Benefits Contracted Third Party or MCJFS Project.”**

The noncustodian’s minor child, residing outside of the noncustodian’s household, may be counted concurrently in the AG size for both the noncustodian’s and the custodian’s household units for PRC.

## **Temporary Absence / Foster Care / Adoption Assistance / Court Placement**

A minor child **“Temporarily Absent”** from the physical household unit of their custodial parent, legal custodian, legal guardian or specified relative may be eligible and also qualify the household they are absent from for PRC; but only if the conditions in rule 5101:1-3 -04 of the Ohio Administrative Code are met (ORC 5107.10). Additionally, if placed in the custody of the PCSA/CSB there must be a current family reunification plan. They are not an eligible member of the household unit in which they temporarily reside, nor can their circumstances be used to make the household in which they temporarily reside categorically eligible.

A minor child placed in **foster care** is only eligible for **TANF purpose 1 & 2** if all the conditions in the above paragraph and are met and they are determined to be **“Temporarily Absent”**. The minor foster child is not considered an eligible member of the foster care family, nor can their circumstance be used to make the foster care household in which they temporarily reside categorically eligible. A **foster child** may be eligible for a specific program/benefit under **TANF purpose 1 & 2** if stipulated in specific guidance.

A minor child placed in foster care is eligible for TANF purpose 3 & 4.

A minor child receiving **adoption assistance** cannot be considered **“Temporarily Absent”** from the home they are absent from, nor be considered an eligible member of the household receiving adoption assistance, nor can their circumstances be used to make the family receiving adoption assistance categorically eligible.

A minor child **adjudicated** and placed out of their home by the Courts cannot be considered **“Temporarily Absent”**.

**Note:** See also “IV-D and IV-E and Foster Care Restrictions” page 17

## **Shared Parenting/Shared Custody**

A minor child in a shared parenting/custody situation will be considered a member of the household unit in which the minor child spends more than 50% of their time. When questionable, the shared parenting information in OPAM 5101:1-3-041 shall be used as a guide to arrive at a prudent decision.

## **Economic Need Standard and Target Group**

To be eligible to receive PRC benefits or services the eligible Assistance Group must satisfy the Economic Need Standard and Target Group designation identified in the attached “**Case Manager Tool - PRC Schedule of Benefits, Limitations & Special Conditions**” or the “**PRC Services & Benefits Contracted Third Party or MCJFS Project**” for the specific benefit or service for which they are applying. The Economic Need Standard may be waived for some services provided under goals 3 and 4, with approval from MCJFS. The Target Group may be modified for some services provided under goals 3 and 4, with approval from MCJFS.

- **Categorical Eligible Assistance Groups:**

The following Assistance Groups are deemed to have met **only the economic need standard and liquid resource limit, when applicable. All other eligibility elements must still be met** to qualify for PRC benefits or services. Verification of Categorical Eligibility is required. **Exception:** MCJFS **may** allow self-affirmation as verification when and where self-affirmation is designated as an allowable verification by ODJFS.

**Hard Categorical Eligibility:**

- This applies to benefits (hard services) issued under the “**Case Manager Tool - PRC Schedule of Benefits, Limitations & Special Conditions**” unless specified otherwise.
- At least one eligible member of the Assistance Group is in receipt of at least one of the following MCJFS administered benefits at time of application, approval or enrollment in PRC: OWF, DFA, Food Assistance, MCJFS approved Child Care Assistance.

**Soft Categorical Eligibility:**

- This applies to (soft services) issued under the “**PRC Services & Benefits Contracted Third Party or MCJFS Project**” unless specified otherwise.
- At least one eligible member of the Assistance Group is in receipt of a specific MCJFS administered means-tested\*\* service or benefit at time of application, approval or enrollment in PRC; **or**
- At least one eligible member of the Assistance Group is in receipt of Supplemental Security Income (SSI) or The Free/Reduced Lunch Program or enrolled in the Early Learning Initiative or Headstart at the time of application, approval or enrollment in PRC; **or**
- At least one eligible member of the Assistance Group is in receipt of a means-tested service or benefit from another agency at the time of application, approval or enrollment in PRC, that has the similar/equivalent or lower income eligibility ceiling as the Economic Need Standard for the service or benefit being requested, and if approval has been received in writing from MCJFS.

\*\* Means-tested MCJFS administered programs for this purpose are: OWF, DFA, DMA, Food Stamps, MCJFS Child Care Assistance Program (not protective child care for PCSA/CSB), and Medicaid.

- **Non-Categorically Eligible Assistance Groups**

The total countable gross income, earned and unearned, received by all **adult** members of the Assistance Group shall not exceed the Federal Poverty Guideline monetary cap for the eligible AG size (updated yearly usually in February) for the PRC benefit or service for which they are applying. **This applies where specified.**

## Calculating Countable Gross Income & Excluded Income for Non-Categorically Eligible Assistance Groups

Total gross countable income, earned and unearned, received by all **adult** members of the AG during the **four to six week budget period** is considered when determining financial eligibility. The **retrospective budget period** is the **four to six week period immediately prior** to the date of application. If the countable income received during the **retrospective budget** period is not representative of future earnings, a **prospective budget period SHALL** be used. The **prospective budget** is determined by a projection of all countable income to be received in the **four to six week** period immediately following the date of application, based upon the best available information.

Income which has terminated **will not** be considered. All income, earned and unearned, received by a minor in the Assistance Group is **not** counted. Unearned income from a means-tested program which qualifies the AG as categorically eligible, such as SSI or OWF or DFA, is **not** counted. Employment incentives/allowances paid via FSET, TANF, OWF, PRC or WIA are not counted.

Actual income received or anticipated to be received or projected, that is received more frequently than monthly, is converted to monthly income as follows: The average weekly income is converted by multiplying by a factor of 4.3. The average bi-weekly income is converted by multiplying by a factor of **2.15**. The average of income received twice per month is converted by multiplying by a factor of **2.00**. There are no deductions or exclusions allowed from any type of countable gross income.

Written or verbal verification of income may be obtained. For any verification of income that is obtained verbally or by phone or through fax, TALX, etc., there must be a release of information signed and dated by the individual with the income, unless there is a release on the signed application. There must be clear documentation on the release and in the AG record concerning the name and position of the supplier of the information, the date the verification was obtained, the source, amount, and frequency of receipt of the verified income, and the name of the MCJFS individual who obtained the verification. **Exception:** MCJFS may accept **self-affirmation** as verification when deemed appropriate for the most expedient and efficient delivery of services and/or an emergent need that immediately threatens the health or safety of a family.

Special conditions exist for counting a minor in the Assistance Group size for purposes of the federal poverty test in the following situations: foster care, temporary absence, shared custody, shared parenting and noncustodial parents. Please see the respective topic for details.

If the AG's total countable gross income is equal to or less than the Federal Poverty Guideline monetary cap for the specific benefit or service for the appropriate AG size as found in the attached "**Case Manager Tool - PRC Schedule of Benefits, Limitations & Special Conditions**" or the "**PRC Services & Benefits Contracted Third Party or MCJFS Project**", the AG meets the Economical Need Standard for the specific benefit or service.

Except for income excluded under this section or under the section "**Income Excluded from PRC by Law**", the Ohio Food Assistance Program Manual shall be used to define excluded income and the methods for projecting income.

## **Income Excluded From PRC By Law**

Please see OAC Section 5101:1-24-20 in the Cash Assistance Manual for income specifically excluded from PRC.

## **Examples of 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
- alimony and child support (unless paid directly to a minor)
- veteran administration benefits
- workers' compensation benefits
- lump-sum payments received during the income budget period (including tax refunds)
- unemployment benefits
- pension and retirement benefits
- strike benefits - (See special eligibility conditions and income computation method under "Strikers" on page 15)
- investment income received on a regular schedule (dividends, interest)
- rental income

**NOTE:** When questionable, the Ohio Food Assistance Program Manual shall be used to define unearned income.

## **Examples of Earned Income**

Earned income is income in which the AG member must perform some type of labor or service to receive. 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 striker is required to perform services in order to receive them)  
(See special eligibility conditions and income computation method under "Strikers" on page 15)

**NOTE:** When questionable, the Ohio Food Assistance Program Manual shall be used to define unearned income.

## Liquid Resources

The only time a liquid resource limit will be applied is when a mandatory liquid resource cap is attached to a specific benefit or service by the funding or regulatory source; such as, with a declared disaster, etc. This plan shall adopt, append and apply such an identified liquid resource cap, unless the resource cap is voluntary. Notice shall be issued whenever a resource cap is effective. When applicable, the available liquid resources of all **adult** members of the assistance group are added together and the total is compared in the established liquid resource limit for the specific service or benefit. Any liquid resources available in excess of the limit are to be applied to the emergent or presenting need prior to the issuance of PRC. An applicant's **statement** of the AG's liquid resources shall suffice as initial verification; however, MCJFS and its agents shall maintain the right to request additional verifications at any time and as otherwise allowed by law.

Liquid resources, for purposes of the PRC Program, are defined as **adult** assistance group member's assets that can be converted into cash within **10 days** from the date of application or request for a service or benefit.

Retirement funds, insurance cash value and trusts are excluded resources. The liquid resources of minors are also excluded.

Categorically eligible assistance groups are **not** subject to the liquid resource limits.

## Application

An application is required to receive most PRC benefits and services. A MCJFS PRC application shall be used with the following exceptions:

- If the entire Assistance Group is in receipt of a specific MCJFS means-tested \*\* service or benefit at the time of application, approval or enrollment in the PRC benefit or service, that programs' application shall suffice to meet the application requirement only; **or**
- If the entire Assistance Group is in receipt of a means-tested service or benefit from another agency at the time of application, approval or enrollment in the PRC benefit or service, that has the same/similar/equivalent income eligibility ceiling as the Economic Need Standard for the service or benefit being requested, and if approval has been received from MCJFS, that programs' application \*\*\* shall suffice to meet the application requirement only; **or**
- Another application format that has received approval from MCJFS\*\*\*; **or**
- The requirement for an application may be waived by MCJFS under specific circumstances and to the extent allowed by the governing authority. TANF goals 3 and 4 often waive an application. Such waivers shall always be in writing\*\*\*\*.

**\*\* Means-tested MCJFS programs** for this purpose are: OWF, DFA, DMA, Food Assurances, Medicaid and the Child Care Assistance Program (except protective child care for PCSA/CSB).

**\*\*\*** All substitute applications must provide the data sets required by MCJFS **and** ODJFS **or** another document must be developed to collect and track the required information.

**\*\*\*\*** If the requirement for an application is waived, another document must be developed to collect and track the information required by MCJFS and ODJFS.

**Note:** All information on an application or substitute document is subject to actual verification at any time by request of MCJFS and its agents, the funding source, and as otherwise allowed by law.

## Social Security Number

The Social Security Number must be provided for all members of the Assistance Group. Client statement will suffice as initial verification, however; MCJFS and its agents may request additional verification at any time, and as otherwise allowed by law. The Social Security Number shall be used for the purposes designated under Ohio Law and authorized under Section 1137 (a) of the Social Security Act.

## Residency

To receive PRC benefits or services the recipient must be a resident of Marion County. Residence is established by living in Marion County voluntarily with the intent to remain permanently or for an indefinite period. Residence is also established by an applicant who is not receiving assistance from another county and entered Marion County with a job commitment or seeking employment, whether or not currently employed.

Assistance Groups must have an independent living arrangement and must not be residents in a county home, city infirmary, jail or other public institution.

Client statement will suffice as initial verification, however; MCJFS and its agents may request additional verifications at any time, and as otherwise allowed by law.

## Applicant Responsibility

An applicant for PRC benefits or services is responsible for completing all necessary documents, furnishing all available facts and information, and cooperating in the eligibility determination process. An applicant/AG must utilize their readily available income (and liquid resources when appropriate) as designated in the **attached “Case Manager Tool - PRC Schedule of Benefits, Limitations & Special Conditions” or the “PRC Services & Benefits Contracted Third Party or MCJFS Project”**, in meeting the presenting or emergent need. There is no PRC eligibility if the Assistant Group fails to make use of their readily available income (or liquid resources when appropriate) as designated in the attached **“Case Manager Tool - PRC Schedule of Benefits, Limitations & Special Conditions” or the “PRC Services & Benefits Contracted Third Party or MCJFS Project”**, that are in an amount sufficient to meet a portion of, or the entire amount of the presenting or emergent need.

All information required to make an informed decision in issuing PRC benefits or services is subject to verification at any time at the request of MCJFS and its agents, and as otherwise allowed by law. Verification may be required for, but not limited to; quality control purposes, program reviews, audits, case monitoring, questionable circumstances, etc.

## Standard of Promptness

When a PRC application is received, the processing individual shall promptly make an objective investigation (and record) of the AG’s circumstances in order to ascertain the facts surrounding the **emergent** or **non-emergent** presenting need, and to request such other information as may be required.

The PRC application is valid for **30** days (unless indicated otherwise) from the date of receipt or until approved or denied; whichever occurs first. Additional needs requested or applied for by the AG during the pendency of an application will be processed by the initial processor.

An AG shall be given a minimum of **(10)** ten business days to provide any requested information in most situations. This time period can be extended due to extenuating circumstances in obtaining the information. This time period may be less depending on the specific time requirements to satisfy an emergent need; such as, a shut off notice deadline. Eligibility or ineligibility, for **emergency** benefits or services shall be determined as soon as possible after all information required to make a determination is provided. Eligibility or ineligibility, for **non-emergency** benefits or services shall be determined within **(10)** ten business days after all required information is provided.

## Notices

All applicants shall be notified of their approval / denial for benefits or services.

If it is determined that an application for PRC is approved, the ODJFS 4074, "Notice of Approval Of Your Application for Assistance" shall be mailed or otherwise delivered. If it is determined that an application for PRC is denied, the ODJFS 7334, "Notice of Denial of Your Application For Assistance" shall be mailed or otherwise delivered. Substitute formats may be used if authorized.

## Period of Continuous Eligibility

Once eligibility is properly established and a family or an individual is properly enrolled in a specific benefit or service, they shall remain eligible for the normal period of time generally accepted for delivery of said service or benefit; unless otherwise stipulated in the **attached "Case Manager Tool – PRC Schedule of Benefits, Limitations & Special Conditions" or the "PRC Services & Benefits Contracted Third Party or MCJFS Project"**.

All contracted benefits and services or specific projects shall delineate the normal duration of time generally accepted for delivery of a specific service or benefit and the frequency of a required redetermination of eligibility. Benefits and services for short term educational purposes shall indicate the specific time they cover.

Changes in AG configuration or financial eligibility or resources shall not affect delivery of services or benefits during this designated time. The conditions under "Ineligible Assistance Groups and Individuals" are still applicable.

## Authorization of Payment

Once eligibility for PRC is established and the provider of the services is willing to accept and has agreed to the methodology of payment, the MCJFS director or designee will authorize and generate payment for the assistance, benefits, and/or services. Authorization may occur at any time during a period beginning on the date that PRC is approved and extending for 30 calendar days from that date. If authorization has not occurred by that time, the agency may require the AG to reapply for assistance. As long as payment is authorized within the appropriate period, actual payment may be made to vendors according to the procedures in place at MCJFS. All PRC payments are made by MCJFS to the vendor. Gas cards, cards for employment readiness needs, and transportation tokens are the only current exceptions and may be given directly to the Assistance Group. Written procedures shall be established to fully account for their distribution. In no situation will PRC be knowingly issued directly to a blood relative, including those of half blood:

- 1.) parent, grandparent and other direct ancestors through great-great-great grandparent,
- 2.) aunt or uncle, 3.) nephew or niece, 4.) brother or sister, 5.) first cousin,
- 6.) current in-laws of those listed able, 7.) spouse,
- 8.) biological parent of an adopted child, and
- 9.) stepfather, stepmother, stepbrother or stepsister.

**NOTE:** TANF/PRC never severs a relationship, even after a divorce or at death.

## **Fraudulent Receipt of PRC Benefits or Services**

The MCJFS shall recover fraudulently obtained PRC benefits and services as overpayments as defined in the MCJFS Fraud Plan. The overpayment cannot exceed: (1) In the case of unreported resources, the amount total resources exceeds the applicable resource caps and (2) in the case of unreported income, the amount the total income exceeds the applicable Federal Poverty Guideline and (3) in the case of an unreported eligibility element that renders the AG ineligible, all benefits and services issued during the period of ineligibility and (4) in the case of unreported eligibility elements that renders **only** an individual ineligible, all benefits and services issued **solely** to the ineligible individual during their period of ineligibility **or the individuals portion if the benefit or service was for the assistance group.**

## **Hold Harmless**

It is understood that the Ohio Department of Job and Family Services and their agents, the Marion County Job & Family Services and their agents, and the Board of the Marion County Commissioners and their agents, shall be held harmless against any and all liability, loss, damage and/or related expenses incurred through the provision of the PRC program.

## **Tracking Benefits and Services**

Data collection and tracking is required for MCJFS and/or any service providers using PRC funds. The data to be collected and tracked is determined by 1) Federal Guidelines, 2) ODJFS Guidelines, and 3) by the limits imposed by MCJFS. To make the tracking process as user friendly as possible each category of benefits and services in the attached **“Case Manager Tool - PRC Schedule of Benefits, Limitations & Special Conditions”** or the **“PRC Services & Benefits Contracted Third Party or MCJFS Project”**, will indicate if they will be tracked in CRIS-E or by another procedure. Some exceptions exist and are clearly noted in the attached “PRC Tracking Procedures” which defines the current data collection process. Subsequent changes in reporting/tracking methods requested by the ODJFS will take precedence and will be initiated as soon as practical.

Benefits and services for the PRC Program are tracked either in CRIS-E, the Web Reporting Tool (WRT) or by an alternative system depending on the type of service or benefit provided and the source of funding.

Benefits or services subject to CRISE tracking shall be tracked by the PRC Assistance Group individual(s) receiving or directly benefitting from the specific benefit or service. Examples: Rent or utilities benefits the entire Assistance Group, thus each individual in the Assistance Group would be tracked. A pair of shoes or tuition would benefit an individual, thus be tracked by the appropriate individual.

## **Coordination With Self-Sufficiency Contract**

All Providers of any training component, **when contractually included**, shall coordinate any and all training programs for OWF recipients with MCJFS to ensure all provisions of said individuals Self-Sufficiency Plan and Contract remain in compliance with applicable codes, rules and regulations. This shall be done prior to the start of any training program. MCJFS alone shall determine the sequence of training and any other work activities for OWF **recipients with a Self-Sufficiency Plan and Contract.**

## **Processing PRC Program/Plan Changes**

Changes to the PRC Program may be made by amendment, addendum or appending. The MCJFS Director shall have the authority to make changes to the Plan, with the **exceptions** of the Biennial Plan and any changes deemed “**significant**” by the Marion County Board of Commissioners.

### **State Hearing /Administrative Appeal**

When a State Hearing or Administrative Appeal under ORC Section 5101.35 is held regarding the PRC Program; the hearing officer, the Director of ODJFS or the Director's designee shall base the decision in the hearing or appeal on the policies for the specific program, written statement of policies adopted under section 5108.08 of the revised code, and any amendments adopted to the statement. (ORC 5108.09)

### **Civil Rights**

The PRC Program shall be operated in accordance with the Age Discrimination Act of 1975, the Americans with Disabilities Act of 1990, Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and any subsequent amendments. There shall be no discrimination against any person(s) because of race, color, sex, family status, religion, age, disability or national origin and the right to and method of appeal will be made available to all persons served under PRC.

### **Confidentiality**

PRC applicants, recipients and their records are confidential and shall be afforded the appropriate protections under the Ohio Revised Code and the applicable Federal Laws.

### **Voter Registration**

In accordance with the National Voter Registration Act (NVRA) of 1993, the Voter Registration application and Voter Declination-Notice Of Rights document, shall be made available to persons who are applying for, receiving assistance from, or participating in the PRC program. (ORC3503.10&329.051)

### **Records**

The PRC application / enrollment form and any other information gathered, including benefits or services issued, shall be kept in the open OWF, Food Stamp, Jobs, Child Care or Medicaid Assistance Group record. If not in receipt of OWF, Food Stamps, Jobs, Child Care or Medicaid a separate PRC file shall be created for the Assistance Group. No voucher shall be issued on behalf of any individual or family unless a CRIS-E case number exists; with the exception of a special project serving numerous individuals or families.

### **Non-Supplantation of Existing Funding for Services**

PRC cannot be used to replace existing funding for services. PRC may be used to enhance or expand current services.

### **Restrictions on Medical Services, Pre-Employment Physicals / Background Checks & Drug Testing**

- No benefit or service can be provided under the PRC Program if it is a Medicaid covered service regardless of an individual's eligibility or non-eligibility for Medicaid. Exceptions are: Pre-pregnancy Family Planning Services (Re-check before allowing) and any other subsequent exception that may be allowed.
- PRC cannot be used to pay for Medicaid covered services beyond what Medicaid covers. (i.e., If Medicaid pays for three days of detoxification - PRC cannot be used for additional days.)
- PRC cannot be used for Dental Services.
- PRC cannot be used to purchase Health Insurance.
- PRC cannot be issued to purchase Eyeglasses.
- PRC cannot be issued to purchase Pre-employment Physicals
- PRC cannot be issued to purchase Pre-employment Drug Screenings
- PRC cannot be issued to purchase Pre-employment Background Checks

**Note:** This list is not all inclusive. Additional benefits or services are continuously added or removed by State and Federal policies.

### **Strikers**

Strikers are only eligible for PRC benefits or services in accordance with the conditions in sections 5101:4-6-07 (A) (B) and (C) of the Food Stamp Certification Handbook.

### **Restrictions on Child Care Services**

PRC funds may not be used for the provision of child care services. Ohio has a statewide child care program with income and eligibility requirements established in state law and Ohio Administrative Code rules. ODJFS reserves the right to hold the TANF funds dedicated to child care services at the state level to maximize every opportunity to expand services.

**Note:** This list is not all inclusive. Additional benefits or services are continuously added or removed by State and Federal policies.

## **IV-D and IV-E and Foster Care Restrictions**

Although counties have considerable flexibility to expend PRC funds consistent with the purposes of TANF, 41 U.S. C. 602 requires that the state certify that it will continue to operate the child support enforcement, foster care, and adoption assistance programs under titles IV-D and IV-E of the Social Security Act.

- Additional restrictions exist for child welfare services that are available under FACSIS.
- PRC use for PCSA services has additional specific limitations which are currently identified in OWF/PRC Guidance Letter 25.
- PRC cannot be used for CSEA IV-D activities. Some activities with the noncustodial parent are permitted; such as job readiness skills, etc.

**Note:** This list is not all inclusive. Additional benefits or services are continuously added or removed by State and Federal policies.

**Note:** Also see “Temporary Absence/Foster Care/Adoption Assistance/Court Placement” on page 7.

## **Educational Restrictions**

Basic Education - TANF dollars, including PRC funds of any kind, cannot be used for basic educational functions that are the responsibility of the Department of Education; such as, but not limited to hiring a teacher, etc.

**Note:** This list is not all inclusive. Additional benefits or services are continuously added or removed by State and Federal policies.

## **Procurement**

The Procurement Policy of MCJFS shall be applied where appropriate.

## Employment Related Short-Term Training

Employment Related Short-Term Training Services: Employment Related Short-Term Training Services can be authorized to assist eligible individuals with employment related short-term training. Employment Services meet TANF Priorities 1 & 2: 1: To provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives, and TANF Purpose 2: To end the dependence of needy parents on government benefits by promoting job preparation, work and marriage.

### AG definition for Employment Related Short-Term Training Services:

A child under age eighteen (18)/age eighteen (18) and still attending high school or its equivalent and immediate family members in the household. Immediate family members include biological and step parents, designated guardians, and biological and step siblings (18 years old and younger) in the household. Other adult household members will not be considered part of the AG.

### Eligibility:

Eligibility for Employment Related Short-Term Training must be at or below 200% FPG for AGs. Eligibility for Employment Related Short-Term Training is based on information gathered in the PRC application.

*Total approved requests for Employment Related Short-Term Training shall not exceed \$8,000.00 per rolling 12 months. Training can only be authorized to support in-demand occupations as determined by MCJFS. Short-term training is defined as lasting less than 12 months.*

**Non-custodial AG definition:** includes the non-custodial parent and on or more minor children for whom the non-custodial parent is required to provide financial support as verified through CSEA. The non-custodial parent must reside in Marion County.

### Disqualifiers:

- AG has not reasonably used existing resources or income to meet or prevent the occurrence of need (excluding Diversion Subsidies)
- The applicant loses employment prior to PRC approval.
- Recurring requests for PRC services will be evaluated on a case by case basis. An application will be subject to denial if an abusive pattern of usage is established.
- Any member of the AG has an outstanding OWF or PRC fraud overpayment balance.
- The applicant is not a U.S. Citizen or legal alien (ineligible aliens can apply on behalf of their eligible children)
- Any member of the AG are fugitive felons or probation/parole violators

Employment Service	Description	Eligibility	Limitations
		at or below 200% FPG	Per rolling 12 months
short term, employment related training	provides training needed to gain, maintain, or advance in employment	must demonstrate that training will increase chances for obtaining employment, maintaining employment, or advancing in employment	\$8,000.00, excluded from cap associated with other Employment Services/Work Supports

**Approved Requests for Employment Related Training Services May Not Exceed \$8,000.00 per rolling 12 months.**

## TANF/PRC On-The-Job Training Program (OJT)

On The Job Training (OJT) is a subsidized employment program that offsets employer training costs for hiring TANF eligible job seekers. Employers who participate in the program will be reimbursed up to 50% of the eligible trainee’s wage during the established training period, not to exceed \$4,500 per eligible participant.

OJT meets TANF Purpose 1: To provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives, and TANF Purpose 2: To end the dependence of needy parents on the government benefits by promoting job preparation, work and marriage.

### AG definition for OJT

A child under age eighteen (18)/age eighteen (18) and still attending high school or its equivalent and immediate family members in the household. Immediate family members include biological parents and stepparents, and the biological and step-siblings in the household. Other adult household members will not be considered part of the AG.

### Eligibility:

- At or below 200% FPG.
- Eligibility is based on information gathered in the PRC application.

### Non-custodial AG definition:

Includes the non-custodial parent and one or more minor children for whom the non-custodial parent is required to provide financial support as verified through CSEA.

The non-custodial parent must reside in Marion County.

### Disqualifiers:

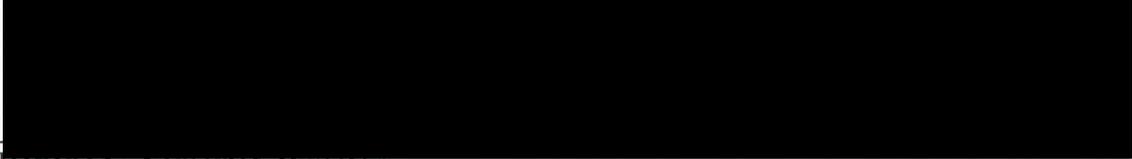
- The applicant is not a U.S. citizen or legal alien (ineligible aliens may apply on behalf of their eligible children)
- Any members of the AG are fugitive felons or probation/parole violators

Qualifying OJT Activities	Description	Eligibility  at or below 200%FPG	Cap per rolling twelve (12) month period (not to exceed \$4,500)
Payments to employers to help cover up to 50% of the eligible trainee’s wage during a specified training period not to exceed \$4,500 (\$4,500)per eligible participant/employee  Pre-employment assessments as required by the employer  Recruitment and development of employers for the program	OJT is designed to provide employers an incentive to hire PRC eligible participants  Job Seekers must be determined eligible <u>prior</u> to being hired by the employer  The employer is expected to hire the job seeker to full time, non-seasonal employment	Participant/employee must be PRC eligible, which means they must meet family composition and income guidelines <u>prior</u> to entering into an OJT agreement with the employer	Caps are negotiated through contractual agreements between MCJFS and participating OJT employers based upon the PRC participants knowledge, training needs, wages and benefits

<p>Supervision of the OJT program</p> <p>Case Management activities related to the program</p> <p>PRC funding cannot be used to reimburse employers for medical benefits</p>	<p>The length of the training period will be based on the trainee's skill level and aptitude and the skills required for the position as determined by the employer</p> <p>Employers are required to offer the OJT participant the same compensation and benefits as workers in similar positions</p>		
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The Prevention, Retention and Contingency Plan in Marion County, otherwise known as PRC will be operated in accordance with the enclosed revisions as amended **October 01, 2015.**

Authorized by:



**Roxane G. Somerlot, Director**  
**Marion County Job & Family Services**