

PREVENTION, RETENTION & CONTINGENCY (PRC) PLAN FOR
THE WAYNE COUNTY DEPARTMENT OF JOB AND FAMILY SERVICES
(WCDJFS)

The Wayne County Prevention, Retention, and Contingency (PRC) Program is designed to provide benefits and services to needy families and low-income employed families who are in need of help with essential supports to move out of poverty and become self-sufficient. This program is not an entitlement. These supports include non-recurrent short-term, crisis-oriented benefits and, ongoing services that are directly related to the four purposes of the TANF program (reference 45 CFR 260 20) which do not meet the federal definition of assistance. Non-recurrent, short-term assistance addresses discrete crisis situations which do not provide for needs extending beyond four months. All income which was received during the 30-day period prior to default will be considered when determining financial need. The 30-day projected budget period will be evaluated to determine if the issuance of PRC will satisfy the need and prevent an ongoing situation. These benefits and services are consistent with the federal definition of “non-assistance” as found in 45 CFR 260 31(b). The definition of “non-assistance” includes:

1. Nonrecurring, 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 transportation provided to families who are employed through the WCDJFS *WIOA or other WCDJFS Programs*;
4. Refundable earned income tax credits;
5. Contributions, 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.

For the purposes of the PRC program, “employment related” is defined in the attached Service Grid. Many of the separate types of services or benefits on the attached grid have unique “employment related” criteria which must be met for the applicant in the targeted group to be considered for eligibility.

PRC Assistance Group (AG) Composition

The PRC AG shall include a minor child (who has not yet attained age eighteen (18), or an individual who has not attained age nineteen (19) and is enrolled and attending high

school/secondary school on a full time basis) who resides with a parent, or specified caretaker. The unborn fetus, for PRC purposes, shall be considered to meet the definition of a minor child. In addition, the PRC AG shall include all other residents in the home who will directly benefit from the PRC benefit and/or service. This includes those individuals normally prohibited from inclusion in an OWF assistance group listed in OAC Rule 5101:1-23-10(D).

Certain PRC benefits and services may be available to the non-custodial parent of a minor child for whom he/she is ordered to pay child support providing he/she does not live in the same household as the minor child. The non-custodial parent must have made child support payments personally or through wage attachment through the appropriate agency responsible for the collection of support payments in at least three (3) of the six (6) months immediately preceding the month of application. For Transportation Needs and Benefits and Job Preparation Services and Benefits Services, the non-custodial parent must have made child support payments personally or through wage attachment through the appropriate agency responsible for the collections of support payments in at least three (3) of the six (6) months immediately preceding the month of application or the non-custodial parent must be fully cooperating with the Child Support Enforcement Agency (CSEA) as determined by the CSEA, or they must be complying with provisions of a Seek Work or Employment program. A portion of each payment must be applied to the non-custodial parent's current obligation(s).

A child may be "temporarily absent" from the home in accordance with the time frames established in Rule #5101:1-3-04 of the Ohio Administrative Code. During the temporary period, the child is residing with the parent, specified caretaker. For the purpose of determining eligibility for PRC, a child can only have one home and cannot be considered to be temporarily absent from another home. In the event of a shared parenting situation, eligibility shall be determined based on the criteria outlined in OAC Rule 5101:1-3-04.1

Eligibility

In order to receive PRC benefits and services a 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) and **must have experienced an unexpected loss of income or expense resulting in the need for assistance for eligibility for *Hard Service requests***.

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. When determining eligibility for the PRC AG to receive benefits or services, the AG's income must be equal to or less than the economic need standard for the AG size.

Income

The total gross income, both earned and unearned of all members of the PRC AG shall be counted using TANF / OWF conversion formulas. This includes all income which is normally exempt or disregarded when determining eligibility for Ohio Works First (OWF). There are some income and benefits which are federally required to be excluded from all assistance programs when determining income eligibility. Rule 5101:1-24-20 of

the Administrative Code addresses the issue of excluded income. 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 unless this period of time does not accurately reflect expected income. In this instance, income received 30 days prior to the date of application may be utilized. Written and/or verbal verification of income is required. For all verifications, there must be clear documentation 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.

Residence

Wayne County residency must be verified with documentation as a condition of eligibility. Exceptions to the county residency requirement are noted in the PRC Service Grid. PRC monies and services issued by other counties in the state shall be counted toward the Wayne County PRC financial caps and any time restricted periods of eligibility (e.g. once every 24 months; once in a lifetime) If the PRC AG received financially capped benefits from another county which were of less value than those capped services offered in Wayne County, the AG may be eligible to receive the difference between the imposed caps; provided all other eligibility factors are met.

Ineligible Family AG

Federal and State law shall be adhered to when providing PRC benefits and services. Based on 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, the following are not eligible for any PRC benefits or services.

1. Families without a minor child.
2. Single individuals, unless pregnant, or a non-custodial relative of a minor child (unless Child Support payment rules are followed).
3. Those requesting medical services.
4. Those who are not United States citizens or qualified aliens
5. Families who fraudulently receive assistance under the OWF and PRC programs until total repayment occurs.

In addition, services offered internally by WCDJFS are further restricted. The following are not eligible for those PRC benefits.

1. Fugitive felons, probation and/or parole violators, including violators of similar programs such as community control or judicial release.
2. Families who are pending a sanction or a period of ineligibility from any assistance program provided by the Wayne County DJFS.
3. Individuals/families serving a sanction or a period of ineligibility from any assistance program provided by the Wayne county DJFS.
4. Individuals with any outstanding intentional program violation (IPV) overpayment balance or who are serving a disqualification from an IPV.
5. Individuals or household members who have an overpayment balance from an

agency error (AE) or inadvertent household error (IHE) claim which is delinquent for more than thirty (30) calendar days unless they make a minimum payment of 20% of their total balances owed. If any claim owed is \$50.00 or less, the claim must be paid in full. In any instance in which the issuance of PRC will immediately assist in maintaining or obtaining employment; and the individual is unable to make a payment on their overpayment, the applicant must speak with someone from the Benefit Recovery Unit (BRU) and enter into a future repayment plan prior to the approval of the PRC application.

6. A person found to have fraudulently misrepresented residence in order to obtain assistance in two or more states is deemed ineligible for ten (10) years from the point the fraud is judicially established.
7. An unmarried parent under 18 not living in an adult supervised setting.
8. An unmarried, non-graduate parent under 18 who is not attending high school or the equivalent.
9. PRC AG 's containing a member who is on strike.
10. PRC AG 's containing a member who has quit or voluntarily reduced their work effort without good cause (as defined by the WCJFS).
11. Families who do not use their own (liquid) resources over and above \$400 to help meet their need.

Sanctioned AG's may be eligible for WCDJFS authorized employment related services after they have served the minimum sanction period for the occurrence.

Providing false information on a PRC application or withholding information necessary for the consideration of PRC cash benefits is considered falsification and is subject to criminal penalty. **Intentional concealment, or false information during the PRC application process shall be considered an Intentional Program Violation (IPV) (whether benefits are issued or not) and the applicant shall be ineligible for PRC assistance for a period of six months effective the month of application.** PRC benefits issued due to Agency or applicant error shall be subject to recovery.

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 procedure 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 except in the event of loss or reduction of program funding from the State of Ohio. WCDJFS certifies that it has followed ORC 5108.05(B) in preparing the PRC plan.

Scope of Benefits/Services

The attached chart contains the scope of benefits and services provided under the Wayne County PRC program. The chart also contains the assistance groups served, the economic need standards for the particular benefit/service, caps on benefits/services, and the targeted groups. The targeted groups are used to customize service delivery specific to the family circumstances, and note any restrictions.

Any number of individual payments can be made during a 12-month period provided the payments are distinctive non-ongoing occurrences. Under no circumstances can a PRC AG receive more than \$3000.00 within any 12 consecutive month period. ***Some*** job preparation services and benefits shall be issued to eligible assistance groups (AG's) through entities under contract with the WCDJFS. These benefits shall be contained in written lists provided to the contracted agency by the WCDJFS. The dollar amount of assistance issued to eligible applicants by the contracted agency shall not be considered when determining the cap amount(s) of benefits issued within the scope of the WCDJFS PRC plan. ***In-house job preparation programs (OJT's and skills training) will have their own dollar cap amount(s) which will be listed for each service within the Grid portion of PRC services.***

Standard of Promptness

The focus of this program is to provide and authorize benefits and services within five (5) calendar 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.

The five (5) day standard of promptness is a suggested time frame that is intended to stress the importance of dealing with PRC applications in an appropriately efficient manner. The denial of a PRC application due only to the expiration of the five (5) day period is not acceptable eligibility determination practice. The AG records should contain sufficient documentation of the case activity on the PRC application, including an explanation of unexpected or unavoidable delays in processing the applications.

Community Resources

Personnel authorizing PRC should be aware of any community resources that could assist a family in need of immediate services. The knowledge of these resources that are available is necessary to determine if any other means within the community may meet or help meet the presenting needs. Local contracts with other entities may be initiated to provide services which may meet or help meet requested needs (i.e., planning transportation services). The PRC application provides a section for written documentation of agency attempts to utilize resources within the community.

Applicant Responsibility

An applicant for PRC is responsible for completing all necessary documents honestly and truthfully, furnishing all available facts and information, and cooperating in the eligibility determination process, including a face to face interview. An applicant must utilize available income and resources in meeting the presenting need. This includes ongoing assistance programs such as OWF, SSI and food stamps, as well as unemployment compensation, social security, and the special energy programs. There is no PRC eligibility if the AG fails to make use of available income that is in an amount sufficient to meet a portion of, or the entire amount of the presenting need.

Application

The "Prevention, Retention, and Contingency (PRC) Program Application" has been developed for use when a family (or an Authorized Representative acting on the AG's behalf) is applying

for PRC benefits and services. The application and any other information gathered during the eligibility determination process should be kept in the ongoing OWF, Medicaid, and/or Food Assistance AG record. If the AG is not in receipt of ongoing OWF, Medicaid, and/or Food Assistance, a separate AG folder should be maintained for the PRC application and related verifications. In addition, PRC benefits and services provided to non-custodial parents shall also be kept in a separate AG folder (if necessary).

Entities contracting with WCDJFS to provide PRC services (*or other in-house job preparation services*) may use alternative application forms only with the approval of WCDJFS. All *denial* forms will contain language approved by WCDJFS which notifies the AG of state hearing rights. Alternative forms may be attached as an addendum to this PRC plan.

Eligibility factors, time restraints, and amounts available to pay for the various benefits and services covered must be explained. Anyone applying for PRC services through WCDJFS must receive appropriate information about, referrals to, and access to Medicaid, Food Assistance, Child Care Assistance, and other programs that provide benefits that could help them successfully transition to work. It is also important to make the voter registration application, as prescribed by the secretary of state under Section 3503.10 of the ORC, available to persons who are applying for, receiving assistance from, or participating in the PRC program. Reference Section 329.051 of the ORC.

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 by accomplishing one of the four purposes of TANF.

- a. Providing assistance to needy families.
- b. Ending the dependence of needy parents by promoting job preparation, work, and marriage;
- c. Preventing and reducing out-of-wedlock pregnancies; and
- d. Encouraging the formation and maintenance of two-parent families.

Notice of Approval/Denial

If it is determined that an application for PRC is approved, WCDJFS shall notify the AG. 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.

Entities contracting with WCDJFS to provide PRC services may use alternative forms to deny such services, subject to WCDJFS approval.

Once eligibility for PRC is established, the WCDJFS Director or designee will authorize and generate payment for the assistance, goods, and/or services if appropriate. Authorization will occur as soon as possible after the date that PRC is approved. ***Payments will be made to vendors unless the vendor will not accept WCDJFS vouchers. In that instance, a reimbursement will be made to the applicant once the AG provides proof that they have made payment in full.*** All PRC payments made by WCDJFS to the vendor on the behalf of the PRC AG are according to

the procedures in place at the WCDJFS. WCDJFS will ensure that its policies meet all auditing requirements.

Definitions

- A. **"Authorized Representative"** is an individual, eighteen years of age or older, who stands in place of the assistance group. The authorized representative may act on behalf of individuals inside or outside the household in which the authorized representative lives. The assistance group must provide a written statement naming the authorized representative and the duties which the named authorized representative may perform on the assistance group's behalf.
- B. **"Disability"** for purposes of the PRC program means An individual who is 60 years of age or older, -or- receiving SSI/RSDI disability benefits, -or- a veteran with a disability rated by the Veterans' Administration (VA) as total or paid as total under Title 38 of the United States Code -or- Individuals assumed to meet the limiting physical factor for Medicaid as stated in O.A.C. Rule #5101:1-39-031 -or- individuals eligible for Medicare or Medicaid for the aged, blind or disabled.
- C. **"Emergency Need"** for purposes of the PRC program means a sudden unexpected change in the AG's financial circumstances. For Contingency Services, the emergency need is the underlying cause for why the AG is in need of financial assistance. **It is one in which the applicant/AG member experienced an unexpected financial loss or unexpected expense within the past 60 days from the date of application.**
- D. **"Fraudulent Assistance"** means assistance and services, including cash, medical & food assistance provided to or on behalf of an assistance group that is provided as a result of fraud by a member of the assistance group, including an intentional violation of the program's requirement. Fraudulent assistance does not include assistance or services to or on behalf of an assistance group that is provided as a result of an error that is the fault of the CDJFS or the ODJFS (Ohio Department of Job and Family Services)
- E. **"Guardian/Specified Caretaker"** is either a relative or a specified individual appointed by the court to care for a minor child.
- F. **"Homeless"** means an individual(s) who lacks a fixed and regular nighttime residence or an individual whose primary nighttime residence is: (1) a supervised shelter designed to provide temporary accommodations (such as a welfare hotel or congregate shelter); (2) a halfway house or similar institution that provides temporary residence for individuals intended to be institutionalized; (3) a nighttime residence which is a temporary accommodation for no more than ninety days from the date the temporary accommodation began in the residence of another individual; or (4) a place not designated for, or ordinarily used, as a regular sleeping accommodation for human beings (a hallway, a bus station, a lobby or similar places).
- G. **"One Time Only"** means the same as once in a lifetime.
- H. **"Ongoing/Recurring Need"** is a financial need that increases in severity and occurs time after time. For contingency services this definition also applies to requests for assistance in which the AG has failed to make a payment in 3 of the 6 months up to and including the month of application.

Effective July 19, 2023

Amendment

This agreement can be amended upon recommendation of the Director of the Wayne County Department of Job and Family Services. The effective date of the amendment will be immediately, unless another date is specified in the amendment.

Director

Date