

Select originating cluster

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Number: SS-IM-05-01

Authorized Signature

Issue Date: 01/06/05

Topic: JOBS Support Service Payments

Q&A that were raised by staff during the JOBS Support Service Payment

Subject: Training Sessions

Applies to (check all that apply):

- All DHS employees
- Area Agencies on Aging
- X Children, Adults and Families
- County DD Program Managers
- County Mental Health Directors
- Health Services
- Seniors and People with Disabilities
- Other (please specify):

Message:

QUESTIONS AND ANSWERS

1. If a payment is being approved - training states that there is no need for decision notice, because the payment is listed in the PDP. But if the payment is not listed already in the PDP, would we need to add to PDP or is narrating in TRACS sufficient?

**Support service payments should always be in the PDP. So if an additional support service payment is made after the PDP has already been put into place, the decision should be narrated in TRACS and the support service payment should be listed in the PDP. The client should sign the amended PDP.**

2. Ineligible non-citizens with eligible children in household - do they qualify for "at-risk" payments for IA adults to maintain employment even though they are employed illegally?

**No. Providing such payments allows the client to do an illegal act. We would not make "at-risk" payments to ineligible non-citizens who are not able to work legally in the United States.**

3. Does that mean no more JOBS service payments for undocumented clients who are attending ESL classes or classes provided by YMCA?

**Correct. If the non-citizen in question is undocumented, the client is not eligible for a JOBS support service payment. However, the client could attend the classes in order to receive the COI.**

4. If an employed "at-risk" client comes in to apply and the branch opens a UN plan can we also take job placement?

**No. If the client is already employed, we would not be able to get credit for a placement since we didn't place the client.**

5. If clients misuse a support service "at-risk" payment would they get an overpayment?

**Yes. In OAR 461-195-0501, and the definition of an overpayment includes "a JOBS program support payment...used by a client for other than the intended purpose..." That would include "at-risk" payments.**

6. If ERDC client loses childcare due to co-pay not met, they come in to get an "at-risk" payment because she will lose her job if she doesn't have childcare. Do we approve for payment?

**No. The purpose of the ERDC program is to help clients meet their child care needs. But as part of that program, clients must meet their co-pay requirement. The co-pay system is based on the client's ability to pay. Clients are expected to make their co-pay requirement out of the money that they receive from work. There is no way that DHS would be able to pay both our share of the childcare cost and the client's co-pay. We will clarify this in a future policy release.**

7. If a PDP ends 12-31-04 and a notice was given to the client at the time the PDP was signed that support service would stop 12-31-04, will DHS pay child care expenses if the client takes the child to child care in January?

**No. The PDP must give a very clear end date for activities. If the PDP has a clear end date, and the client continues to use the childcare provider after the end date for the case plan. We will not pay. Optimally, case managers would meet with clients prior to the end date on the case plan to assess the clients' case management needs and complete a new case plan.**

8. How do we verify if an ODL is valid? Unable to verify on DMV screens do we accept the client's statement or pay the fee to have DMV verify that the license is valid?

**We would either use the DMV screens that we have or accept the client's statement, unless there is some reason to question whether the person had a valid driver's license. We would need to make sure that we narrated the decision. However, if the client insists that their driver's license is valid and DHS questions this, we could pay the verification fee.**

9. What about valid insurance? Shouldn't we verify if a client has valid insurance before approving support payments?

**If staff have doubts that a client has valid driver's insurance, we should verify that with the insurance company before making payment.**

10. Can fines be paid if client has to drive?

**No. We will not pay fines for past client tickets or other violations. This will be clarified in a future policy release.**

11. What if a client verbally asks a reception staff for a support service payment?

**It depends on the situation. In the case of a family requesting an "at-risk" payment, the client must be directed to complete a 415F and then be seen by a case manager or screener. In other instances, if the client has a case manager, the client should be referred to the case manager or to the case manager's backup.**

12. Client is MAA because decided not to participate in the JOBS Program. Would that client be eligible for a support service payment?

**Such a client would not be eligible to receive a JOBS support service payment. The client must be one of the types of clients referred to in the Family Services Manual. A person who is receiving only MAA should not be asked to participate in the JOBS program, and would not receive support service payments.**

13. Client requests support payment for rent within 12 months of decision to not participate. Still refuses to be in JOBS.

**Per the policy, any client who refuses to cooperate with the JOBS program**

**or participate in their case plan activities would not be eligible to receive a JOBS support service payment.**

14. I am confused as to what a "JOBS support payment" is. I don't think that paying utilities, housing, etc, should be only the responsibility of DHS (especially when client is on open cash grant). What is to prevent a client from continually requesting support payments to avoid doing the JOBS program?

**When clients are participating with the JOBS program, it is DHS' responsibility to help clients meet expenses necessary to participation. If a client is unable to attend JOBS activities because of a lack or transportation or child care (or for some other reason), DHS must consider the client's situation and the need to support the client. The point of the JOBS program is to help clients to find and maintain employment so that they can leave cash assistance behind. There are instances where DHS would deny a request for a housing payment. Generally, clients who receive on-going TANF should not receive JOBS support service payments for housing. Clients are expected to pay their housing expenses out of their TANF grants, although they are very small.**

15. Client requests bus tickets. Client's JOBS attendance is sporadic. CM gives them some tickets and tells client if they attend JOBS ongoing daily they can come get more. Do I send any notices?

**No, because the client's request has not been denied, and you are not providing a different benefit or payment than the one the client requested. The client requested bus tickets and you are providing them.**

16. Lack of assets from disqualification (JOBS). Reduced grant or 0 grant results in inability to pay basic needs. Do we pay from JOBS support services?

**The policy currently states that we would not pay a housing payment in that situation. However, since the point of disqualification is to encourage client participation in JOBS, we may need to pay shelter expenses if necessary to help the client cooperate. Also, homelessness puts children's safety at risk. Therefore, we could consider making vendor payment if the client is disqualified but the grant remains open. Staff should remember that there are often lower-cost alternatives to maintaining a client in their current dwelling. There are also resources in the community that can assist clients with services and case management to help them remain housed.**

17. If a client comes in to apply for TNF and enters the assessment program and requests a shelter payment of \$2,000 to keep their home...would we pay it or work with client on locating alternate housing? Does the 200% cap apply?

**The cap on basic living expenses would apply in this case since the client is in the Assessment Program. DHS would also consider lower-cost alternatives. So, for example, if the client's rent is \$2000 because they have not paid in two or more months, and 200% of the Adjusted Income Payment Standard works out for this family to be \$920, we would not be able to make the payment because the rent exceeds the limit. The client and case manager would need to explore other alternatives. This could include shelter or living with relatives.**

18. What NOTM CM is the notice writer on?

**There are two notice writer notices related to JOBS support service payments:**

**For denials: CMD2FJS**

**For closures or reductions: CMC2FJR**

19. If a client uses a TANF application for "at-risk" payment and you set up the case plan for 09/27-09/30, can the client use the same application for another payment in the next month since the application is good for 45 days? Would you use the same application so the client would not have to complete another one?

**The client must submit another application. OAR 461-115-0050 states that the same application can be used both to determine a client ineligible in the month of application and to determine the client eligible the next month. However, this only occurs if anticipated changes make the filing group eligible the next month. In the case of "at-risk" payments, there would be no way to anticipate whether changes would make the applicant eligible next month or not. So the client would need to submit another application for TANF / "at-risk" payment.**

20. When approving a one-time payment for a support service (such as housing), do we need to give a notice to the client that the payment is going to end or would we just deny future payments?

**One-time payments are considered to be on-going, even though they are different from what we normally think of as on-going payments (such as**

TANF monthly grants). Therefore, if DHS approves a JOBS support service payment to a client or for a client, we also need to give the client a notice letting them know that the benefit is then closing. Staff would only need to consider also giving a denial if we are approving a payment that is lesser than what the client originally asked for.

21. What about when you know the TANF grant won't even cover the rent and utilities? Will we be expected to cover diapers, personal hygiene & household items?

**No. For clients receiving an on-going TANF grant, the expectation is that the clients will pay for their needs out of the grant that they receive. Staff should attempt to connect clients to resources in the community that may be able to assist with such items.**

22. Providing notice when childcare is reduced? How will they do this?

**Since Child Care payments are made to the provider, and not to the client, and since the amount will vary from month to month, there is no reason that staff will need to send notices to clients about increasing or decreasing child care amounts. Providers are paid based on hours billed, and the client does not receive any cash benefit. Clients must be informed through their case plan of the amount that DHS intends to authorize for child care, but reduction notices are not necessary.**

23. 10-day notice for bus pass/childcare for disqualified clients - no time for 10-day notice?

**Unlike other benefits, JOBS support service payments do not need to end on the last day of the month. They can end on the date that the client is no longer eligible for support service payments or on the day that the case plan ends. In the case of disqualified clients, the payments would end when the client stops cooperating with a case plan. There will likely be times when we will need to continue to pay support services for a few days after the client has stopped cooperating because there is no time to provide 10 day notice. We are considering changes to this policy that would allow DHS to provide a notice to clients that does not require 10-days notice but allows the client to request continuing benefits.**

24. How does this work if we disqualify a client for non-cooperation in JOBS -- we disqualify on 09/27 for 11/1--however, now we send 456 that bus pass/cc will stop because client is not cooperating in jobs, we don't have time to make it effective 10/01--do we have to give a non-coop client a bus pass and cc voucher

for 10/1 simply because we don't have 10 days?

**The best solution in a situation like this would be to try to re-engage the client before the 11/01 effective date of the disqualification. DHS will still likely lose some money in the process, but it will usually be worth the effort to get the client engaged. If that fails however, it is important to remember that the 10-day period for support services can end much sooner than the end of the month. The notice will be different than the disqualification notice, which informs the client that their grant will be reduced on the first of November. For the JOBS notice, we can end payments ten days after the end of the client's cooperation. So in other words, instead of ending payments at the end of October, we would close payments for October 8<sup>th</sup>.**

25. Consider non-custodial parents when thinking about paying traffic fines. There are many non-custodial parents who need this assistance. In our work with parole & probation, this comes up frequently tied to argument that "I need a car for work, then I can pay my child support."

**DHS will not pay traffic fines, even for non-custodial parents.**

26. What if custodial parent with child has been granted good cause for non-pursuit of child support? Is the non-custodial parent in this case eligible for JOBS support services?

**If there is a safety concern related to pursuing child support, DHS will not work with the non-custodial parent. Therefore, there would be no support service payments to such non-custodial parents.**

27. Can non-custodial parent who is working receive help with rent? They state this will keep them working so they can still pay child support?

**Only if the parent met all of the requirements to receive an "at-risk" payments. But that would require them to meet all TANF program requirements except income. If the non-custodial parent had no children living with him or her, there would be no potential TANF eligibility, and therefore no eligibility for an at-risk payment.**

28. Ask for \$100 for gas, we give a bus pass and denial notice for the \$100. Client refuses bus pass. Client requests a hearing. Does client wait until after hearing before being required to participate?

No. If we have offered a support service payment to the client and the client has refused it, they are still required to participate. If the client fails to cooperate and we move toward disqualification, we will still have to provide conciliation. By then, the expedited hearing will likely have taken place. If the hearing officer's decision is in the client's favor, we will know that the client may have had good cause for failing to participate based on the support service payment issue. If the hearing officer rules in the agency's favor, we will know that any good cause that the client has is not related to the support service payment issue (the client may have other good cause not related to the support service payment).

Would we have to wait until after a hearing to conciliate for non-participation?

**No, although non-cooperation and conciliation will likely take place after the hearing takes place.**

29. 461-190-0211(3)-(F) and (E) state to me that clients are eligible for JOBS payments if they are disqualified for child support of JOBS. Yet under housing and utilities section of the presentation it says the lack of assets did not result from a child support disqualification.

**TANF clients who have a child support sanction on their grant can generally get JOBS support service payments in order to participate in the JOBS program. The only exception to this is housing and utility payments. If the client's inability to pay their rent or utility payments were the result of the child support disqualification, then we would not make JOBS support service payments for housing.**

30. Is it OK to have a client who is getting child support or other unearned income to pay part of their rent and then use the 200% to pay the rest?

**If that will help the client participate in the JOBS program, then yes.**

31. If the client is at risk of losing a job but would receive UI in an amount above the TANF standard if they lose their job, would we deny the payment or pay?

**If as a result of losing their job their UI will be greater than the TANF limit, they would not be "at-risk" of receiving TANF because they would be ineligible for TANF either way. Therefore, DHS would not make an at-risk payment.**

32. Client DJ6 requests re-engagement. \$20 issued for transportation to attend activity. Client fails to attend. Comes in next week to cooperate, asks for another \$20 for gas. Still no participation. Third week same deal. I assume we

can't deny pmt because we've already given money for the need if client states she's spent it. Just keep issuing, right?

**By that point, it would be apparent to DHS and the client that more money is not the solution. The first step would be to look at what activities the client is expected to attend. It may be necessary to change the case plan and have the client attend other activities. This process may likely mean that partners will need to be involved. Next, it may be important to reiterate to the client that if they spend a JOBS support service payment on items not authorized in the case plan, they may have an overpayment. Third, we must never end our quest for lower cost alternatives. If the client is willing to participate, but needs support service payments in order to do so, DHS must be diligent in finding lower cost alternatives. But in the end, the purpose of disqualification is participation. If a disqualified client states that they want to participate in JOBS, the system is designed in such a way that DHS must give them an opportunity to do so. If that means that we must issue support service payments in order to facilitate cooperation, then that will be what we must do.**

33. Can you put the TRACS narratives in columnar form (like a newspaper) as a viewing option?

**That is not possible. There is also no way to bold or highlight text.**

34. How do we set up a TANF case so that the system will let us make a JAS payment for a non-custodial parent with no child in his or her home?

**You would set up a case as a P2 case in 'pend' status with a JOBS status code of 'E'. The non-custodial parent would have a 'WTW' case descriptor. The WTW c/d is very important because it prevents an AP notice from being sent automatically to the client. Also use an 'O' service group in TRACS.**

35. Can WSIT be structured so that a reduction notice will be generated when the reduction occurs?

**The voucher that is issued to the provider already says this. The JCCB the provider receives indicates how many hours are authorized. Then the client signs it so they both know how many hours are authorized for the month. Sometimes the hours are reduced, but not necessarily the money that the provider can receive.**

36. The person who does the expedited hearing is also the one who has approved the denial of support service payment.

**This should not be an issue for the person who made the JOBS payment decision to represent the agency at the hearing. The outcome of the hearing will be determined by the hearing officer, not the agency's hearing representative.**

37. Jeff, maybe JOBS support service payments in general and at-risk payments in particular should be like TA-DVS: the second time in twelve months we should staff with you.

**We in general, and Jeff in particular, believe this to be workload intensive for staff and for Jeff. And therefore unworkable. However, as questions arise, staff are encouraged to call me at (503) 945-6542. Or you can always GroupWise me.**

38. Do we need to have an open case plan in order to issue a support payment?

**You can make payments on exited plans, but the client must be participating in order to do so. The policy is clear that in order to receive a JOBS support service payment, the client must be cooperating with a case plan.**

And second if the car repair were \$400, would we pay that also?

**If a \$400 payment were the lowest cost alternative available and the client needed the payment in order to participate, then we would make the payment.**

39. In the Assessment Program, is the 200% of the payment standard for basic needs for the 45 days Assessment Program period or is the 200% for a calendar month. Example: The client applies mid-month and needs current month rent and then on the first of the next month they need rent again? Between the two months this would exceed 200%.

**Per OAR 461-135-0475, the 200% basic living expense restriction is for the entire Assessment Program period, not each month in which the client is in the Assessment Program.**

40. Is there a chart showing what the DQI income should be on Food Stamps when a DJ is in place?

**For information on the amount of DQI to be coded on Food Stamps when a client is disqualified, please consult the Food Stamp chapter of the Family Services Manual.**

41. When a client's child reaches an age limit where the hourly rate for child care will be reduced (for example, child goes from infant to toddler to preschool age) are we required to send a decision notice because the hourly rate paid for child care will be less?

**Generally no, since the amount of the child care for the time being covered should be listed on the PDP. So for example, if a child will go from infant to toddler during the period in which the client is participating, that should be reflected in the case plan.**

42. Clients request \$400 utility payment. We agree to pay \$300. Will we need to send denial notice because not issuing the \$400 and a close notice because it was a one time payment? Can we include all this on one notice?

**There is space on the revised DHS 456 form to mark both.**

43. Do we have to verify:

1. Driver or client has valid drivers license?
  2. Driver or client has valid auto insurance before issuing gas money?
- And If we deny gas money because of no insurance, are we then required to pay insurance—assuming no other form of transportation is available?

**Staff must verify that the client has a valid driver's license and insurance. In instances where staff doubt the accuracy of information on the DMV screens or the client's statement, staff can require clients to bring verification of their DMV and insurance status. If the client does not have insurance, DHS can pay to have it reinstated, at the smallest amount necessary so long as there are no fines involved. The client may have to make other arrangements, such as getting rides from friends or family, in order to participate. If that happens, DHS can pay for gas for others in order to get them to take clients to JOBS activities.**

44. Suggest if budget issues become a problem with "at-risk" payments we limit it to once per quarter. Same as for TA-DVS.

**DHS is monitoring "at-risk" expenditures. It may be necessary in the future to do what you suggest.**

45. Client requests a change from \$35 gas check to a \$26 bus pass. Do you need to send a notice to reduce or a close notice for gas money because it is stopping?

**No. If the client is requesting the bus pass and DHS provides it, there is no reduction because we are providing what the client has requested.**

46. Daycare payment

If hours go from 192 to 160 do we need to send a notice to reduce, because the dollar amount of the childcare payment would be the same?

**No. The billing form should have already been authorized for up to the maximum amount and would not change.**

47. When denying an “at-risk” request and there is no UCMS case, do you need to create a case on UCMS and deny on line? If not, when completing 456, what case # do you use?

**If there is no previous UCMS case on line, the case manager will need to create a new case, and deny it on line if no other benefits are opened on the CM case. Then use the same case number on the denial notice. If medical or child care benefits are opened, use that number on the denial notice.**

48. Possible money saving technique & motivation factor for TANF recipients:

1. Work w/ housing and have TANF related more closely to amt they pay for housing (rent =\$60; grant is \$200; rent =\$500; grant is \$700) Cap it off at \$700 or something. This accomplishes two things...it motivates low income housing clients to go to work where we don't now. And we pay TANF more appropriately to their expenses.

**It is not possible for our current system to be able to implement this suggestion, although we agree that it is a good one.**

49. If a person not receiving TANF (OHP or FS only) asks for support services and is not eligible do we have to give them a denial notice also?

**Yes. Any denied request for a support service payment must have a denial notice also.**

50. In all other situations, when you use NOTM to send a specific denial or reduce notice, the NOTM notice already lists the specific administrative rules. Can this be done on the support service payment notices to save time and

51. If change of child care (less hours) in middle of the plan what do we do?

**Nothing. The child care voucher will have already been issued to the provider for that month, since all JCCBs are to be issued prospectively. If the provider does not provide care for the entire amount of time listed on the case plan, then the amount billed should be less. If however, the provider does bill for time not spent caring for the child, then DHS would write an overpayment against the provider.**

52. Case plan 10/1 through 12/31/04 plan states will supp w/ bus pass monthly. Plan states client will call by 20<sup>th</sup> of each month to request bus pass for following month. Worker does not mail out automatically. What if client doesn't call? Does worker need to send BP anyway or send notice?

**For your process to continue to work, you may have to adjust it some by moving the date back a couple of days (e.g., have the client call by the 18<sup>th</sup> rather than the 20<sup>th</sup>). If the client does not call, issue a 456 informing them that the bus pass will not be available on the first of the next month.**

53. What would we do with child care payments if client does not have good cause for non cooperation after conciliation? Would we cancel payment for same month?

**Again, since the voucher has already been issued, the amount of child care paid will depend on the number of hours that the provider bills DHS. If a voucher has not been issued, it needs to be done so the provider can be paid. If DHS paid for childcare that the client used inappropriately or if the provider bills for hours of care that were not provided, DHS would write an overpayment.**

*If you have any questions about this information, contact:*

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|--------------------|--------------|-------------|--------------|
| <b>Contact(s):</b> | Jeff Stell   |             |              |
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