# JOB OPPORTUNITY AND BASIC SKILLS SUPPORT SERVICES GUIDE

State of Oregon Department of Human Services – Office of Self Sufficiency Programs

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#### Intent

The intent of Temporary Assistance for Needy Families (TANF) Job Opportunity Basic Skills (JOBS) **support services payments** are to provide individualized assistance for participants to support their ability to successfully engage in JOBS activities that promote:

- Family Stability;
- Build skills for and reduce challenges to employment.
- Accept job offers and retain employment.

Support services are subject to the limitations of state and federal funding and must be used as part of a Personal Development Plan (PDP) with participants. Exploration of the participant's strengths and resources as well as local community resources are part of the overall equation for support services.

Ensuring those engaging in SSP TANF JOBS program have timely, appropriate, and equitable access to JOBS support services is a top priority for all. It is important all involved with the process around the state have a shared understanding of the intent, scope, and parameters of funding. ODHS staff are asked to utilize this guide to inform and guide practice and process at the local level.

A few key areas to highlight:

- Equity must center all work.
  - Those requesting, consulting, and authorizing support services funding must be aware of how personal bias and judgement impact access.
  - Those who develop, review, and modify processes must be aware of our systems deep-rooted framework based on white privilege and work to actively uproot processes that are inequitable. Framed as being good stewards of funding or ensuring program compliance, a family's lack of access to much needed support may be the result of an existing paternalistic view of what is deemed appropriate and essential. Put simply, our system is grounded on a framework based on white privilege. Proactively challenging that model by mindfully accessing our own biases is the responsibility of all. This is an area for collective growth.

- Support families to identify long term solutions to ongoing needs. Support services are intended to provide short-term individualized assistance and are not intended to be used on an ongoing or repeated basis.
  - Engage in deliberate and authentic conversation with families on feasible and reasonable strategies.
  - Connect families with culturally responsive resources that support longer term solutions.
- Regardless of a rural or urban setting, families must have access to support services funding in a consistent, equitable, and timely manner across the state. Guidance outlined within this guide and associated tools/resources is intended to provide clarity and promote consistency in how ODHS employees view and approve access.

Importantly, if existing rules, policies, or processes are serving as barriers to equitable and timely access for individuals and families, please notify the <u>TANF Policy Box</u> for review and consultation. You are also encouraged to talk with your manager, engagement specialist or contact the TANF Policy Box if/when you are uncertain as to how to support families receiving TANF most effectively through support services funding.

#### **Eligible Individuals**

Individuals who are JOBS eligible, JOBS volunteers, or in the State-Family Pre-SSI (SFPSS) program with an active Personal Development Plan (PDP) are eligible for support services payments.

**JOBS eligible**: TANF participants unless otherwise JOBS exempt (see table below) from participation are considered JOBS eligible, even if they are not in the TANF program benefit group.

Situation	JOBS Status	Engaged in JOBS services	Eligible for Support Services
TANF participant not otherwise exempt, receiving TANF benefits.	Eligible	Yes	Yes
TANF participant who has exceeded 60-month time limit	Eligible	Yes	Yes
TANF participant who is a work eligible non-citizen	Eligible	Yes	Yes
TANF participant who is serving an intentional program violation (IPV)	Eligible	Yes	Yes

**State Family Pre-SSI/SSDI Program:** State Family Pre-SSI (SFPSS) participants and the second parent (if they are a two-parent household) fall into a category all on their own. Participants in the SFPSS program and the second parent if they are a two-parent household are eligible to engage in JOBS activities as appropriate and are eligible for support services.

Situation	JOBS	Engaged in	Eligible for
	Status	JOBS services	Support
			Services
Participant engaged in the	N/A	Yes	Yes
State Family Pre-SSI program			
Second adult in the household	N/A	No	0
Second adult in the household	N/A	Yes	Yes

**JOBS Volunteers:** Participants who meet a state exemption below are JOBS Volunteers. They can choose to engage in services and are not subject to JOBS disqualification. Support services are offered and approved based on their engagement in JOBS services.

Situation	JOBS Status	Engaged in JOBS services	Eligible for Support Services
Pregnant and the pregnancy has reached the first of the calendar month prior to the month in which the due date falls.	Volunteer	No	No
Pregnant and the pregnancy has reached the first of the calendar month prior to the month in which the due date falls.	Volunteer	Yes	Yes
Parent experiencing medical complications due to pregnancy	Volunteer	No	No
Parent experiencing medical complications due to pregnancy	Volunteer	Yes	Yes
Parent 20 or older with a child under 6 months of age Parent under 20 with a child under 16 weeks	Volunteer	No	No
Parent 20 or older with a child under 6 months of age Parent under 20 with a child under 16 weeks	Volunteer	Yes	Yes
VISITA Volunteer	Volunteer	No	No
VISITA Volunteer	Volunteer	Yes	Yes

#### **Ineligible Individuals (JOBS-exempt)**

**JOBS Exempt / Federal exemptions:** Participants who are federally JOBS exempt are not eligible for JOBS support services, including the following individuals.

Situation	JOBS Status	Engaged in JOBS	Eligible for Support
		services	Services
SSI recipient	Exempt	N/A	No
Non-Needy caretaker relative	Exempt	N/A	No
Non-work authorized non- citizen	Exempt	N/A	No
Caring for a disabled member in the household*	Exempt	N/A	No

<sup>\*</sup> If the participant is no longer caring for a household member with disabilities and does not meet any other exemptions, they are considered **JOBS Eligible.** The update must be entered into ONE. The system updates the individuals JOBS status from exempt to mandatory based on the information received from the medical provider.

<sup>\*</sup>An individual can choose to work with the JOBS program and not be considered exempt if the individual has decided the supports through the JOBS program is the most beneficial for the family.

#### **Payments Overview**

When discussing support services requests, approvals, and payments the family coach or department designee works **collaboratively with the participant** to research available resources. The department considers all lower cost alternatives, which are reasonably attainable in the community. Payments are made on behalf of an **eligible individual** actively **engaged in a PDP and aligned to support their goals.** 

Actively engaged means, a participant is working with their family coach in developing a case plan, engaging in the current plan, or changing the plan to meet the participant's goals. Engagement can occur at any time. Regular communication including text, phone calls, or face to face contact with the family coach or contracted partner is one example of engaging in a PDP.

#### Payments are provided when:

- Necessary to engage in activities in a JOBS PDP;
- Authorized in advance; and
- As allowable in support services rule <u>OAR 461-190-0211</u>.

#### **Non-allowable Payments**

The following payments are not allowed under OAR 461-190-0211:

- Any payments related to employment in, seeking employment in, or engaged in a federally prohibited activity (see OAR 461-120-0215);
- ERDC co-payments;
- Legal costs, including fines, reinstatement fees, court costs, restitution or other costs associated with a penalty;
- Medical treatments or services including mental health or alcohol and drug treatment. Medical services are not allowable under the <u>Social Security Act</u> 408(a)(6);
- Non-essential items, such as television and cable;
- Debt held with a collection agency;
- Pet-related costs including pet deposits, pet fees, kennels, etc.;
- Professional Services (a service requiring specialized knowledge and skill)
- Purchase of a motor vehicle such as a motorcycle, car, recreational vehicle, or motor home.

<sup>\*</sup>Note IOU's or promissory notes are not allowable.

#### **Non-allowable Activities**

The following JOBS activities are not eligible for support services:

- Family Support & Connections (FC)
- Retentions services (BR, RT)
- Microenterprise (MI)

#### **Program Entry (PE)**

ONE does not currently function to allow support services approval for PDPs with a standalone Program Entry (PE) step. In scenarios where support services are needed and the only step on the PDP is PE an override must be completed. See the <a href="Program">Program</a> Payments and Supports QRG for override instructions.

# **Payments Requested and issued via ONE**

Type of Payment	Description and Use	Guidelines / Limitations
Auto Expenses	Payments issued through ONE for auto expenses; car repairs, car insurance, registration, tags, title and DEQ.	Payments are limited to minimum necessary repairs for vehicle operation. Cost of repairs must be reasonable in relation to the value of the vehicle and are approved using local area process.
	<b>Example:</b> minor car repairs, new alternator, fuel pump, tires, one or two months of insurance (Including SR-22), etc.	Payments for car insurance may be authorized for no more than two months in a 12-month period.
		The vehicle must be in the participant's name, and they must have legal right to own and operate the vehicle for payment of registration, tags, title and DEQ.
		Payment for specialty license plates (with the exemption of specialty veteran's plates that require a onetime registration fee), impound fees and any additional DMV fees that are in addition to what is required by "the general public" are not allowed.

Type of Payment	Description and Use	Guidelines / Limitations
Books/ Supplies (Not Tuition)	Payments issued through ONE for <b>books</b> and <b>supplies</b> , for a participant to engage in an educational activity on their JOBS PDP. <b>Example:</b> textbooks related to CNA classes or educational supplies required for completing electrical certification course.	Payments are made when there are no other educational resources available (IE educational loans, grants, scholarships, etc.) and only for educational activities on the participant's JOBS PDP.  Payments are limited to educationally necessary books and supplies.
Bus Payment <sup>1</sup>	Payments issued through ONE directly to the participant to pay for <b>public transportation</b> .	Follow the local process on transportation allowances and issuances.  Payment is limited to public transportation only.

<sup>&</sup>lt;sup>1</sup> Requests for recurring bus payments may not exceed six consecutive months of issuance per request. If the individual's eligibility changes during the six months of recurring payments, *timely continuing benefit decision notice* (see OAR <u>461-001-0000</u>) must be sent.

Type of Payment	Description and Use	Guidelines / Limitations
Clothing	Payments issued through ONE for clothing items to support the participant to engage in the JOBS program.	Payments are limited to the adult participant engaged in a JOBS PDP.
	<b>Examples</b> include interview clothing, clothing needed to accept a job offer, work uniforms, clothing needed for a WE or PL placement.	
Gas Payment <sup>2</sup>	Payments issued through ONE directly to the participant to pay for <b>fuel costs</b> related to transportation (not gas cards).	It is not acceptable practice to require a participant to provide proof of driver's license or insurance. See <a href="SS-IM-21-017">SS-IM-21-017</a>
		Payments are limited to fuel cost only.

<sup>&</sup>lt;sup>2</sup> Requests for recurring gas payments may not exceed six consecutive months of issuance per request. If the individual's eligibility changes during the six months of recurring payments, *timely continuing benefit decision notice* (see OAR <u>461-001-0000</u>) must be sent.

Type of Payment	Description and Use	Guidelines / Limitations
Grooming Needs	Payments issued through ONE for grooming needs for employment related activities.  Examples: haircut, personal hygiene items, laundry detergent or grooming needs based on the type of employment.	Payments are limited to the adult participant engaged in a JOBS PDP.
Housing/Utilities	Payments issued through ONE for moving, housing, and utility expenses for eligible individuals engaged in a JOBS PDP.  Examples: rent or public utility payments paid directly to the vender, including internet on a month-by-month basis.	Each Payment type with the exclusion of internet payments is limited to two months per benefit group and the total payments cannot exceed \$3,000 per benefit group in a three-month period. With prior manager approval, and upon verification that an individual has greater needs to stabilize a living situation or prevent loss of housing, the Department may approve payments that exceed \$3,000 and two months of cost.  For Internet payments, no contract can be entered into by the agency; therefore, month-by-month payments are the only allowable option.
Hotel/Motel	Payments for hotel/motel are an allowable payment under Moving Expense/Relocation, they should be rare. Motel/hotel payments are not meant to sustain long term housing.	Payments are short term (maximum 2 weeks) while the family transitions to permanent housing.

	Examples: Short term stay while the family transitions into permanent stable housing. Emergent needs such as extreme weather and local alternative (shelter) are unavailable.	
Type of Payment	Description and Use	Guidelines / Limitations
Professional Fees	Payments for licenses and certificates needed by the participant in support of their JOBS PDP.  Examples: OR Driver's license, OR ID card, GED or high school diploma fee, CPR certificate, OLCC licenses, fees to complete a background check, etc.	Fees associated with employment in the marijuana industry are prohibited.
Other (Support Services Payments)	Payments not otherwise listed in this chart, necessary for the participant to engage in employment or family stability activities not otherwise restricted or prohibited in OAR 461-190-0211.	Payments are subject to limitations under OAR 461-190-0211.  Used to pay for allowable support services payments not listed above that have been staffed with a supervisor and the details clearly narrated in case records.  Review all other payment types prior to submitting a payment request as "other".

Type of Payment	Description and Use	Guidelines / Limitations
Tools/ Equipment	Payment for <b>tools or equipment</b> needed to accept a job offer, WE, JT, and PL position.	Payments are made with an offer of employment, WE, JT, or PL worksite agreement.
	<b>Example:</b> flagging equipment to accept an offer of employment, tools needed to engage in a Work Experience (WE).	
Vocational Training or Self- Initiated Training	Payments for <b>tuition</b> (VT, SI, JS, and JO when transitioning to VT, SI) and other <b>educational costs</b> . <b>Examples:</b> course tuition, lab fees or other class related fees.	Lower cost alternatives must be pursued, such as applying for financial aid and other sources of assistance. Payments are made when there are no other educational resources available, and only for educational activities on the participant's JOBS PDP.
Work Eligible Non-Citizen	All payments, regardless of the payment type for adults who are ineligible non-citizens but have a legal work authorization to work in the US and are receiving TANF for an eligible child.	Payments are subject to limitations under OAR 461-190-0211.  Payments are limited to any limitations, restrictions, or prohibitions listed in this chart based on the payment type.

# **Payments Requested in ONE but issued outside of ONE**

Type of Payment	Description and Use	Guidelines / Limitations
Bus Pass/Tickets	Bus pass / tickets issued in person directly to the participant. (Follow local procedure)	Confirm bus pass or tickets are available prior to evaluating for this payment type.
	Payment information must be entered into ONE.	This payment type does not include a monetary issuance to the individual. It is to be tracked and accounted for through a local negotiables log.
JOBS Incidentals	Negotiable items provided directly to individuals, inventoried and tracked at the local level.  Payment information must be entered into	This payment type does not include a check issued by accounting systems to the individual. Items are tracked and accounted for through your local
	ONE.	ordering, securing, and issuing negotiables process.
	<b>Examples</b> : gas cards, store (gift) cards, clothing vouchers, toiletries, etc.	Not all offices maintain an inventory of these items. Follow SSP business process protocols and your local negotiable
	Used to provide items purchased with JOBS funds to support family goals while engage in the JOBS program.	process regarding these types of items.

<sup>\*\*</sup>For additional information, refer to the <a href="Program Payments and Supports QRG">Program Payments and Supports QRG</a>.

### Connecting Payments to Plans

TANF and JOBS programs support individuals in attaining goals by providing payments for items participants need to successfully engage in their PDP.

Support services directly related to a participant's goals and PDP. If the support services payment does not support the participant's goals and PDP, the request will be denied. Any issuances for ineligible payment types or payments that do not support the participant's PDP would be an error and may cause an overpayment to the family.

#### **Example:**

Felix's long-term goal is to go back to school and finish his degree. While working with his family coach, Felix identifies that he needs to address his family's housing stability and mental health concerns before he is ready to return to school. His PDP is for 5 hours a week to attend Rent Well classes and continue to work with his local Community Action agency, as well as 2 hours a week to go to mental health appointments.

Felix is excited about his short and long-term goals and finds a child care provider to care for his 5-year-old, but the provider will only take the child if they are fulltime. Felix asks the family coach for fulltime child care. The family coach explains that we cannot increase ERDC hours to secure a fulltime child care slot his plan does not support the need.

Felix and his family coach discuss the following options:

- Look for a different provider who will accept the hourly rate at 108hours a month.
- Possibly use a friend or family member who is willing to go through the process of becoming a state certified child care provider.
- Consider alternative child care options like afterschool programs or head start.
- Engaging in additional activities and adjusting his plan to reflect fulltime hours.
   For example, he could consider volunteering (FLSA hours apply) in his field of study and job search to support the need for more child care hours.

### Support Services for Self- Employment

Lower cost alternatives must be explored first, including but not limited to:

- Local small business administration
- Self-employment startup programs offered through Worksource (when available)

These resources often have grants available to assist individuals in starting up their own business.

When individuals have explored these options and still have a remaining cost that they are requesting support services for, payments can be considered for some of the costs. Any items requested that are billable to their client is not an allowable support service payment as it benefits a non-TANF recipient.

#### Example 1:

Individual is starting an in-home daycare and requesting support service payments for the following items: cribs, baby proofing, snacks, diapers, and crib sheets. The individual first needs to explore local resources such as the small business administration to apply for grants.

Snacks and diapers are a benefit of the client and considered in the billable amount to the client, therefore they are not allowable as a support service payment. ODHS could consider paying for cribs, baby proofing, and crib sheets after having a conversation about what the individual expects parents to provide. Some daycares require the parent to provide crib sheets, in which case we would not assist with payment for that item.

#### Example 2:

Individual will be self-employed as an esthetician and requesting support service payments for business startup and supplies. Items requesting include facial steamer, facial creams, tweezers, face towels, and microdermabrasion scrubs. The individual first needs to explore local resources such as the small business administration to apply for grants.

Facial creams and microdermabrasion are a one-time use item that is billable to the client as part of the service cost, therefore ODHS is not able to assist with these requests. However, the facial steamer, tweezers, and face towels are an ongoing business need not directly billable to the client, therefore ODHS can consider assisting with these payment requests.

### **Brokering & Negotiation Payments**

The process of brokering and negotiating payments allows for ODHS staff to work with participants and determine where JOBS support services are most appropriate, and where it may be important to look at other options or resources. While there is flexibility in support services payments, there is still a requirement to consider reasonable lower cost alternatives as part of the payment negotiation process.

Sometimes the support services need is outside the scope of allowable support services payments. In these situations, it is even more important that the participant and family coach work together to look for other solutions to address the overall family need.

Part of the support services conversation must include a discussion around budgeting. What is the family's current need and what is their ongoing need? Sometimes the answer is simple, they need a payment that directly supports their PDP and is allowable within support services rule.

When the support services request is more complicated, the participant and family coach must identify ongoing monthly bills and income. TANF is often not enough to pay all the living expenses. Community resources can alleviate some stress and meet a longer-term need, such as housing and utilities. Sometimes there are short term or onetime only community resources that can help cover expenses such as car payments or glasses that are not allowable support services payments.

During the conversation about monthly expenses, the family coach may also identify some one-time support services payments for expenses allowable within rule that would also help the family meet all their overall budget needs.

#### **Example:**

Diane has been on TANF for a few months while talking with her family coach she discloses that she needs eyeglasses. Diane's family coach sits down with her, and they go over her monthly budget. She receives TANF of \$506 a month for herself and her two children. She reports that they currently have subsidized housing, and she is responsible for \$150 per month. Diane stated that her electric bill was high this month as it is getting colder outside. Diane also reports that she pays for cable TV / Internet and a cell phone. After paying all her bills she has just under \$50 per month to pay for basic hygiene and living needs.

The family coach shares information about a local community program that might be able to help with the expense of the glasses and frames. They talk about a referral from her primary care physician and asking his Community Care Organization (CCO) if the prescription would be covered by her insurance. The family coach offers to pay one month of rent to alleviate this expense and free up money for the family to use for other expenses that are not allowable to be paid for by support services. The family coach is also able to provide Diane with \$50 in support services to pay for personal hygiene items so that she can continue to look for sustainable employment. Diane is also interested in meeting with a family advocate from Family Support and Connections to see if the program is a right fit for her family.

With the short-term holistic support around this monthly budget Diane can obtain eyeglasses and pay cable TV/internet bills out of her TANF grant for the month. Shortly thereafter Diane accepts an offer for employment with ODOT and closes her TANF grant.

#### **Request for Support Services**

A JOBS eligible individual or JOBS volunteer may request a support services payment by phone, in person, or in writing: including email, note, text message, or other forms of written communication. The Request for Temporary Assistance for Needy Families (TANF) support services and Notice of Decision and Action Taken (DHS 7822) form may be used but it is not required. If this form is utilized by the participant, all actions must still take place in ONE, including when a request is denied.

Support services payments can only be approved when made in advance and authorized by the department.

Once a request is submitted to the department, the family coach enters the request into ONE and makes a determination in time to meet the need by either **approving**, **modifying**, or **denying** the request.<sup>3</sup>

Support services request do not require to be staffed with leadership before being entered into ONE. Case notes in ONE must be clear and concise and indicate the need as supported by the individual's PDP. If an approver of support services (local leadership) has additional questions, staffing with the family coach would be appropriate. There may also be a need to add clarifying case notes.

There may be times when additional information is required to approve/deny/modify a support services request. In these rare circumstances the family coach will need to complete the following:

- Add a detailed case note of the individuals request, including what additional information is needed to make a determination.
- Complete and send a manual 210a requesting the additional information.
  - o Minimum of 10 days to respond must be given.
- Upload a copy of the 210a into the ONE electronic case file.
- Create a manual pend task as outlined in the <u>Correspondences Manual Notices</u> <u>QRG</u>

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<sup>&</sup>lt;sup>3</sup> OAR 461-115-0190

#### **Approving Payments**

Approving reasonable low-cost support services payments for transportation, and employment related expenses is part of the family coach's discussion with the participant. If after having a discussion with the participant, support services requests supporting their ongoing goal and PDP can be approved by authorized staff.

**Notices:** ONE sends an approval notice when the requested item is approved in full to the participant or 3<sup>rd</sup> party vendor on behalf of the participant. ONE sends a timely closure notice for recurring (more than 1 payment for the same intended purpose) support services payments.

#### **Example:**

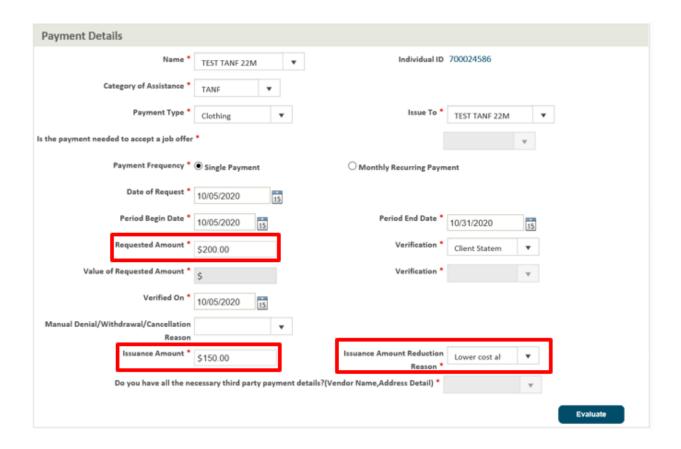
Owen contacts their family coach via a text message and reports that they have been offered employment as a wildland firefighter. Owen states their employer requires staff to wear heavy Carhart pants and boots. Owen makes a support services request for three pairs of heavy Carhart pants and boots.

The family coach Googles the cost of the requested gear available in the community and determines the requested amount is reasonable and not available via lower cost alternatives. The family coach then enters the support services request via ONE for Owen to be mailed a check from Salem. The family coach lets Owen know that the check will be arriving within a few days. ONE will send an approval notice to Owen.

#### **Modifying Payments**

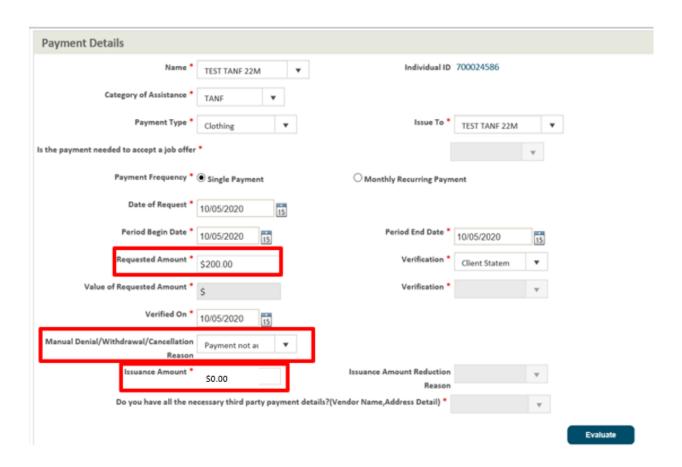
Sometimes, after having a conversation with the participant the family coach needs to modify the participant's support services request. This can be due to the request not being reasonable to cover the support services need, discovery of a lower cost alternative, or to better meet the participant's needs. A modification could be to decrease or increase the original amount requested as appropriate.

In these situations, the family coach will still enter the request with the entire requested amount into ONE. The final approved payment amount will be entered 'Issuance Amount' field, prompting a reason to be selected in the 'Issuance Amount Reduction Reason' field. ONE will send a basic decision notice explaining the reason their full request was not met, based on the entered selection.



#### **Denying Payments**

Sometimes participants request support services for items that either are not allowable or are not supported by their PDP activities. In these situations, the family coach would deny the support services request. The family coach would enter the request into ONE and select a denial reason from 'Manual Denial/Withdrawal/Cancellation Reason' field. ONE will send the participant a basic decision notice based on the entered selection reason.



#### **Example:**

Meryem contacts her family coach and request assistance paying for glasses. The department is unable to approve such a request as the Social Security Act 408(a)(6), states that medical services, supplies, and equipment are not allowable payments with TANF or JOBS funding. The family coach enters and denies the request in ONE. The family coach meets with Meryem, they go over her budget and believe she could cover the cost of the glasses if she had help with her gas bill. The family coach agrees to pay her \$50 gas bill and sends a basic denial notice for the support services request for glasses.

#### **Cost Verification**

Payments made to the participant – The exact amount of support services made payable to the participant, for basic transportation and employment related support services, such as fuel and clothing, do not need to be verified by the participant. Family coaches have a conversation with the participant as to what is reasonable and can make a determination, rounding up to the nearest dollar amount. Discuss with the participant if they will incur a cost to cash the check to determine if the check cashing fee should be included. Participants must not be asked to provide receipts or verification of exact cost for a request. Additionally, participants are not required to seek multiple "bids" for support services. If the requested amount seems questionable family coaches may either Google the cost or research the cost with local venders, rounding up to the nearest dollar amount.

<u>Payments made to a vendor</u> – All payments made directly to vendors require verification of the exact amount as the vendor must have the exact payment amount. Verification can include but is not limited to the following:

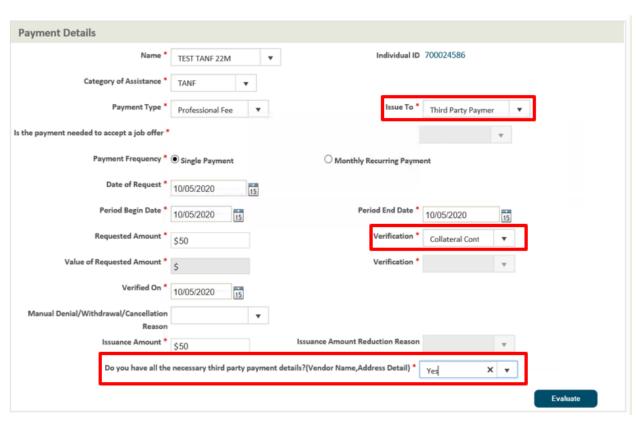
- Bill or shut off notice from public utility;
- Rental agreement;
- Phone call with vendor;
- Bill from vendor;
- Quote from vendor;
- Other written or verbal communication outlining the cost of the item.

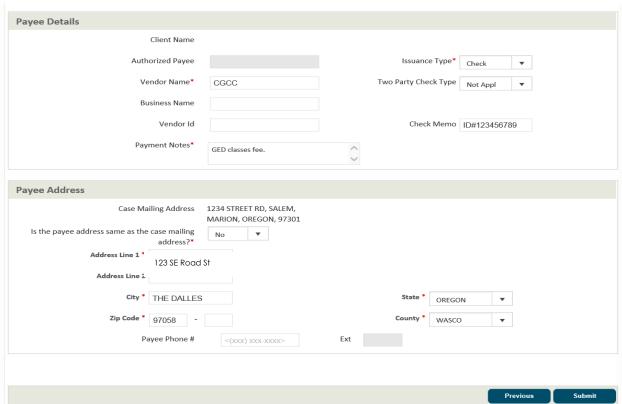
#### **Example:**

Abigail contacted her family coach letting him know that she accepted employment with Frans Bakery. To start her new job, she needs non-slip shoes, a white shirt, and black pants. Abigail and her family coach agree that \$150 is a reasonable amount to purchase 2 pairs of pants, 2 shirts and black shoes. The family coach enters and submits the support services request in ONE, and lets Abigail know that a check will be coming in the mail.

#### **Example:**

Georgiana has been attending GED classes through Columbia Gorge Community College. She lets her family coach know that she is ready to take her final test. The family coach contacts the GED department, who agrees to take a state check from Salem if Georgiana's student account information is on the check. The family coach shares the news with Georgiana and enters the support services request into ONE payable to CGCC for Georgiana.





#### What if there is money left over?

Sometimes there are a few dollars left over due to rounding. Once support services are authorized and issued to the participant, the money belongs to them. The department cannot request participants to return any change left over in purchasing items with support service funds. Nor does the department require the participant to return with a receipt for proof of purchase of the requested items.

The participant is issued support services in good faith they will use the payment to purchase the agreed upon support services item. It is a valuable life skill if due to sales, discounts, or thrifty shopping the participant can stretch the money and get more items than originally approved. The department would not require a receipt or verification of this and would not pursue an overpayment.

#### **Example:**

Abigail receives her support services check in the mail, and heads to Fred Meyer to purchase the items she requested. She notices that Fred Meyer has a spend \$150 get \$30.00 off your purchase coupon. Using the coupon Abigail can purchase a third shirt and package of socks. She lets her family coach know, who congratulates her again on her employment and recognized Abigail's skill of stretching the resources she has available to help meet her needs.

#### **Quality of support services**

<u>The support services rule</u> requires the department to consider lower-cost alternatives before making a support services payment. Lower cost is not always equivalent to the cheapest. When considering lower-cost alternatives consider the long-term goals of the participant, and reasonable lifespan of the requested item. The participant's goal and reasonable lifespan of the items should match when possible.

#### **Example:**

Owen, who has accepted employment as a wildland firefighter, reviews their offer letter and equipment requirements with their family coach. Employment as a wildland firefighter requires quality sturdy work boots. This is a reasonable expectation based on the type of employment. The worker Googles quality work boots for this line of work, and although cheaper boots could be purchased at a local big box store the quality does not meet the need based on the type of employment. The family coach approved slightly higher cost boots that meets the need of the employment.

#### Case notes

Department staff reviewing and approving payment requests are responsible for validating proper case notes in ONE prior to approval of payment.

Family coaches are responsible for adding appropriate case notes into ONE at the time they request the support services payment.

Case notes include:

- Payment details: (what is the support service)
  - Examples include but not limited to:
    - Type of support service;
    - Amount of support service;
    - Payee of support service;
    - Any appropriate conversation with vender or special payment instructions.
- Individual's story (why is the support service needed)
  - Examples include but not limited to:
    - Individual's progress, activity, goal, or appropriate PDP
    - Individual's efforts and resources
- Department's decision (FC's and approving authority)
  - Approved
  - Modified/reduced.
  - o Denied

#### **Case Note Example:**

Utility support services payment \$355 approved and entered in system.

Bandile requested \$500 in utility payments to cover a past due electric bill. Per phone call with Maria at WASCO PUD (503-999-9999) current balance is \$355. Family coach is requesting \$355 in support services payments.

At time of contact with PUD, Maria confirmed that the utility company would accept a check mailed from ODHS if it included the account number 8675309 printed on the check and sent directly to WASCO PUD.

Bandile has been engaged in services with WorkSource and actively looking for employment. The family received a shut-off notice from PUD. Bandile indicates with the colder weather she has not been able to keep up with the additional electrical cost.

Family coach shared energy assistance program information and Bandile was able to sign up.

Case Note Example: Clothing support services \$150 approved.

Abigail requested support services to cover shoes, shirt, and pants needed to start employment at Frans Bakery. Abigail indicates she starts next week and can wait for a check to arrive from Salem.

Abigail had been engaged in a JO activity with the contractor.

Payment entered in the system.

# Supporting individuals exempt (not eligible) for JOBS Support Services

ONE will not allow support services to be issued for the following Individuals:

- SSI recipients;
- Non-needy caretaker relative (NNCR);
- Non-work authorized non-citizen;
- Exempt and caring for a family member who has a disability.

Although these individuals are not eligible for JOBS services, support services, or a PDP in TRACS; family coaches have the opportunity to work with them to address the family's needs, challenges, and goals. Supporting a family's plan could mean connecting individuals with community resources that provide supports specific to their needs. If you need support or assistance determining what resources are available, connect with your local Community Partnership Coordinator or Engagement Specialist. These conversations can be captured in a TRACS narration.

#### **Individuals who receive Social Security Income (SSI)**

Supplemental Security Income (SSI) is a federal income supplement program funded by general tax revenues (not Social Security taxes.) It is designed to help aged, blind, and individuals with disabilities, who have little or no income. It provides cash to meet basic needs for food, clothing, and shelter. SSI and TANF come from the same source of federal funding. Individuals who receive SSI cannot receive TANF for themselves. Since support services are considered a TANF benefit, they are not allowed for individuals receiving SSI.

#### How can this impact families?

The value of any TANF support services may be countable towards SSI benefit calculation which could then cause an SSI overpayment, administered by the Social Security Administration.

Family coaches can work with individuals receiving SSI by brainstorming, using critical thinking, and providing information related to local community resources. Resources available to everyone in the community are also available to those receiving SSI and could include but are not limited to the following:

- ERDC for individuals on SSI who are employed;
- Vocational Rehabilitation for those who wish to join the workforce;
- Goodwill Industries, The ARC, Advocates for Life Skills and Opportunities (AFLSO) and other non-profits that work with individuals with disabilities who wish to gain employment;
- Local housing resources, HUD, and Community Action Agencies;
- Local faith-based organizations;
- Local food banks.

#### Individuals who are non-needy caretaker relatives

Non-Needy caretaker relative grants are intended to help meet the basic needs of children in the care of relatives. The grant does not cover the non-needy caretaker who does not qualify or wishes not to apply for TANF. As the adult does not qualify for TANF, they are not eligible for support services.

#### What resources can we provide?

- ERDC for non-needy caretakers who are employed;
- 211 info;
- Local housing resources, HUD, Community Action Agencies;
- Local faith-based organizations or non-profit organizations;
- Local food banks.

#### Individuals who are non-work authorized noncitizens

While many immigrants who are lawfully present in the United States are eligible for public benefits, there are restrictions based on citizenship and immigration status that limit their access to several federal programs. These include many of the programs intended to support work, economic stability, nutrition, and health for low-income children and families. Historically, unauthorized immigrants were ineligible for federally funded assistance, but welfare reform in 1996 also restricted access for lawfully present immigrants based on their immigration status, when they arrived in the United States, and length of U.S. residence.<sup>4</sup>

<sup>4</sup> https://aspe.hhs.gov/basic-report/overview-immigrants-eligibility-snap-tanf-medicaid-and-chip

#### What resources can we provide?

- Immigration Counseling Service;
- Legal Aid of Oregon;
- SOAR Immigration Legal Services;
- Other low-cost legal resources for immigrants and refugees;
- Local food banks;
- Local faith-based organizations;
- 211 info.

# Individuals who are exempt to care for a family member with a disability

Individuals who are exempt to care for a family member with a disability who resides in the household are the only category of participants who can choose to be exempt or not. This choice determines if they are eligible for the JOBS program and to receive support services. Verification is not required to remove the exemption coding.

#### **Example 1:**

Mary has been staying at home to care for her child who has a disability and requires 24-hour assistance. For the last two years she has provided her family coach with documentation from a medical provider, stating that she is needed in the home to care for her child. During this period, her JOBS status has been that of JOBS exempt, and her family coach has been providing community resource information but is unable to offer a PDP, contracted activities, or support services.

Recently, Mary's child has begun to experience improvement and her family is helping provide respite care. Because of these changes and the added support, she has decided that she would like to see a change in her life. She schedules a JOBS appointment and states she would like to engage in activities and change her situation. She states, that with gas money and assistance with the fees to obtain her driver's license she feels she can engage in JOBS activities. The family coach updates data collection screens in ONE based on Mary's statements. Family coach discussed with Mary if she was in need of child care. Mary stated she would need assistance. Family coach assist Mary in applying for ERDC. Mary meets the categorical ERDC eligibility criteria. Mary goes back to school to finish her nursing certificate, successfully completing her goals and changing her future for herself and child.

#### **Example 2:**

Jenna has been exempted from JOBS to care for her child who has a disability for the past 6 months. The family coach recently checked in with her as her documentation around the exemption was due to expire soon. While talking with the family coach, Jenna asked for assistance paying for their utility bill, she mentioned they had some unexpected medical costs that were not covered by insurance and to pay the medical costs she is now unable to pay for her electricity bill. The family coach talks with Jenna about her JOBS status and that she may be eligible for support services payments and other JOBS services if chooses no longer to be exempt. They talk about what her PDP could look like, Jenna says that she is working on applying for SSI for her child and has been working with the school district around supports at school. The family coach tells Jenna about local JOBS services and Family Support and Connections. Jenna is interested in learning more about FS&C and decides to engage in the JOBS program.

The family coach updates Jenna's JOBS status in ONE. They set up Jenna with a PDP, the family coach refers her to FS&C, and they discuss further the request for the assistance with the electricity bill.

# Supplemental guidance on issuing housing and utility payments.

To issue support services for housing and/or utilities the following <u>is an opportunity to</u> <u>provide case management services to the participant needing assistance with</u> <u>housing/utility payments:</u>

- Participant is actively engaged and eligible for JOBS support services with no active disqualifications;
- Participant has a plan for sustaining housing related payments;
- Participant is currently or will be working with a local housing agency to access available resources;
- Participant has a legal obligation to make the payment; AND
- Participant did not cause or had no control of the events leading to unstable living situation. What is considered a moving expense/relocation?
- Rent
- Mortgage
- Hotel/Motel (limited to 2 weeks)
  - Short term stays while family transition to permanent stable housing.
  - Emergent needs such as extreme weather and there aren't any alternate resources.

What is considered a utility for support services?

- Electric
- Water/sewer
- Garbage/dump costs
- Heat source (gas, propane, etc.)
- Phone (landline, cell phone)
- Internet

#### **Energy Assistance Program Agencies in Oregon**

https://www.oregon.gov/ohcs/Pages/energy-assistance-agency-service-counties-regions.aspx

TANF housing and utility support services are designed to help meet a short-term current need to prevent housing insecurity, while connecting families with long-term solutions available in their local community.

Once a housing payment is made family coaches engage families in the next steps to help meet their ongoing needs and goals. This would include connecting them with local housing agencies, referrals to JOBS Contractors who offer Stabilized Living services (if available locally), following up on their progress, and guiding them to additional resources such as extended family, faith-based organizations, and other community resources to assist with their ongoing housing expenses. If the family does not engage with community resources, the department may not be able to make additional payments in future months.

In general, TANF Policy recommends that any duplicate requests that are within a six-month period, be staffed at the local level. This will aid in working towards developing long-term permanent solutions that will stabilize the family's housing crisis.

#### Example 1:

A family requests is subsequently approved for a shelter payment for the months of October and November. On January 1<sup>st</sup>, they request an additional payment (4<sup>th</sup> month). This request should be staffed with local leadership to see what other long-term options are potentially available.

If the family has already received two months of housing payments twice and is requesting a third time within nine months, it needs to be staffed with TANF Policy.

#### **Example 2:**

A family requests and is subsequently approved for a shelter payment for the months of October and November. On January 1<sup>st</sup> they request additional assistance, and it is approved by local leadership. Payments are made for January and February. On April 1<sup>st</sup>, an additional request is made by the family. This request must be staffed with TANF Policy.

#### **Example 3:**

A family has requested a support service payment to stay in a hotel for two days. The family states the extreme cold has made it impossible to continue staying in their tent. The family shares they are in contact with their sister, and she has agreed to let them stay with her while they secure housing. The sister is unable to come pick them up until she has time off from work. The family coach agrees to issue a support service payment due to the emergent need.

# Supplemental guidance on issuing tuition payments.

#### Intent:

Support service payments for tuition are intended only for individuals who are not currently eligible for financial aid but are actively working towards regaining financial aid eligibility. Lower cost alternatives such as FAFSA and other resources must be explored and accepted (if available to the induvial) before support service payments are made. There are several reasons in why a participant may not be eligible for financial aid. Some examples include but are *not limited to*;

- Unsatisfactory student progress: Examples:
  - o GPA is too low,
  - Completion rate of credits attempted does not meet the federal minimum requirement
- Past student loans are in default with the federal Department of Education
- Unpaid balances to educational institutions. This is money owed directly to the current or previous educational institution the individual attended.

These payments are meant to help cover tuition cost, books, and supplies while they work to resolve their financial aid ineligibility. Payments must be short-term, reviewed at each school term (defined by the institution), and the individual must show satisfactory progress towards resolving their financial aid ineligibility.

Individuals requesting these support services payments must provide a financial aid reinstatement letter from their educational institution before the department can consider approval.

# Supplemental guidance on issuing payments for eyeglasses.

Oregon Department of Human Services (ODHS) has been granted approval from the Administration for Children and Families (ACF) to issue support services for eyeglasses when needed for gaining or maintaining employment. Previously, this payment type was not possible due to the federal policy stating TANF funds cannot be utilized for medical services. However, after conversations with Oregon, ACF agreed that support services for eyeglasses may be allowed when removing a barrier towards employment, and Medicaid will not cover the cost. Eye exams are still considered a medical service and support services cannot be used to cover the cost of eye exams; Medicaid services should be accessed if an exam is needed.

Purchasing eyeglasses, including non-prescription over the counter reading glasses, can be approved when needed to remove a barrier towards future employment or maintenance of current employment. When approving payments for eyeglasses, please include a clear description on how the support services payment will remove barriers towards gaining employment. Some examples of activities that may require glasses to remove a barrier towards employment are provided below; this is not an all-inclusive list.

#### **Examples:**

- Activities related to employment such as job search.
- Educational activities that prepare individuals for employment
- Life Skill activities preparing individuals for employment.
- Any activity that the individual is engaged in to prepare for work, such as mental health or substance use disorder treatment.

Request for eyeglasses under \$50 **do not** require medical documentation of the need. Any request for eyeglasses above \$50 **does** requires documentation from a qualified and appropriate professional, such as an optometrist or ophthalmologist.

Individuals who fall in the below categories are not eligible to receive eyeglasses through support service dollars.

- Individuals under the age of 21 or,
- Pregnant individuals over age 21 or,
- Within 12 months post-partum

Family coaches can offer assistance in connecting individuals to their Coordinated Care Organization (CCO) if enrolled, or Oregon Health Plan Care Coordination (OHPCC) if on an open card, to get this service covered. If the individual has an emergent need in which the CCO cannot cover this cost timely by Medicaid, the family coach should explore utilizing support services for other allowable expenses such as housing or utilities to free up funds for the participant to use towards eyeglasses.

Eyeglasses does **not** include contact lenses. Request for contact lenses would be required to be modified to eyeglasses if the participant agrees. If the participant does not agree, the request would be denied. If denied, the family coach should explore with the participant other payments that could be allowable to free up funds so the individual can purchase the contact lenses.

**Example:** Alicia who has a PDP with a VT step to obtain their phlebotomist certification met with their family coach, Joel, during their monthly JOBS appointment. Through the course of conversation Alicia shared that they are struggling in class due to their vision. Alicia states they attempt to get to class early to get a front row seat, however, even then they cannot clearly see the board. Alicia states they have gotten an eye exam covered by OHP. However, the cost of eyeglasses is not covered, and Alicia does not have the \$185 needed to cover the cost. Joel informs Alicia that support services could be utilized to pay for the eyeglasses. Due to the cost being over \$50, Joel explains that he will need to receive medical verification for the payment. Alicia provides verification

to Joel, who enters the request into ONE under the payment type of 'Eyeglasses – Employment Readiness' for their leadership to approve.

**Example:** Omar calls his family coach, Kathy to ask about glasses. Omar is currently in a PDP with child activities step to attend parenting classes for three hours per week. Kathy utilizes this request as an opportunity to review the PDP and get curious about exploring additional steps that may be added due to activities Omar is engaging in. Omar stated he is not interested at this time in additional activities and mentions he needs glasses to better focus on reading his text messages. Since Omar is not currently connected in an activity that will remove a barrier to employment, Kathy explains this to Omar and denies the request in ONE and offers community resources.

**Example:** Meike has a PDP with a WO step and is not over income for TANF, calls her family coach Sarah, requesting replacement glasses because hers broke. She needs glasses to perform her job duties. Sarah learns from Meike that the glasses she needs are over the counter readers that are under \$50, therefore, Sarah approves the support services request in ONE under the payment type of 'Eyeglasses – Employment Readiness' without the need for medical documentation.