

## **TANF/JOBS Program Re-Engagement Review – March 2011**

### ***Background***

The Department of Human Services (DHS) conducts re-engagement reviews every six months in accordance with ORS 412.009 (6).

The “re-engagement” process is performed to ensure the following:

- Individual case plans were created in partnership with clients;
- Activities on the case plan were appropriate;
- Clients are aware of their rights and responsibilities;
- Screenings and possible evaluations for barriers have been offered/completed and documented; and
- A team review of the family’s situation before potential sanction – which includes a discussion of child safety issues – was conducted.

The goal of these efforts is to identify early potential barriers to client success in the program and ensure necessary steps are taken to address those barriers.

### ***March 2011 Review – Race and Ethnicity***

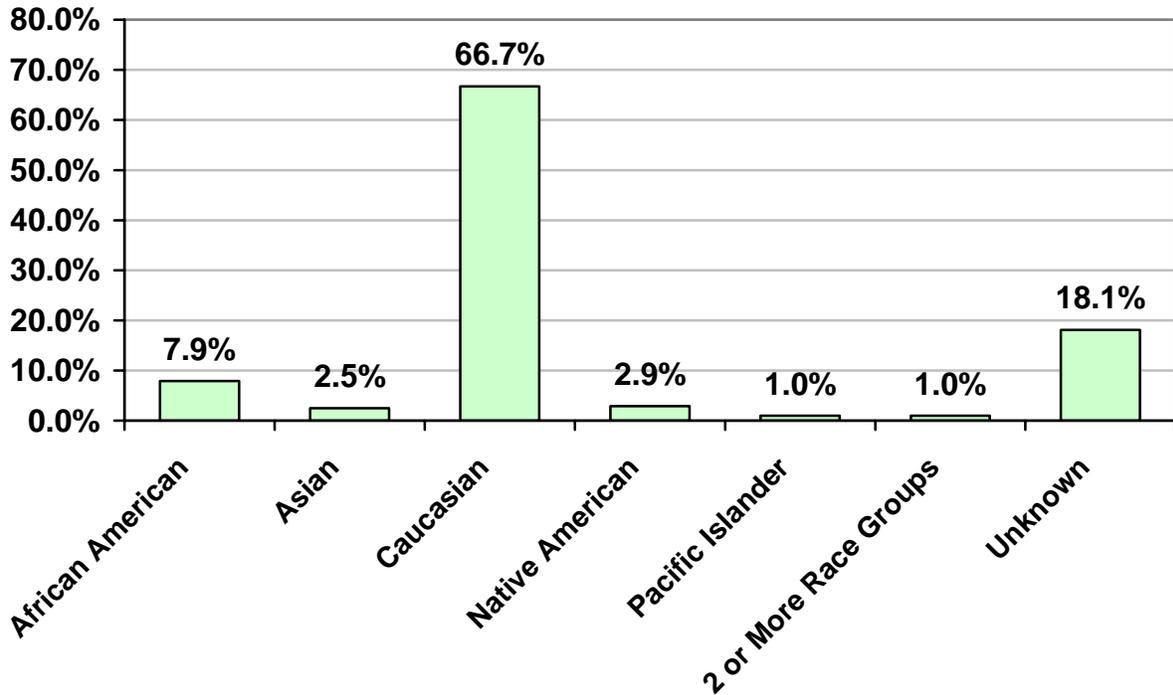
The biannual review, conducted for the month of March 2011, included all TANF cases with an active disqualification as of March 1<sup>st</sup>. A total of 315 cases were included as part of this review. This was an increase of 104 cases over the September 2010 review.

As with the September 2010 review, race and ethnicity data was included. The chart below, displays the race and ethnicity information relative to the 315 clients<sup>1</sup>.

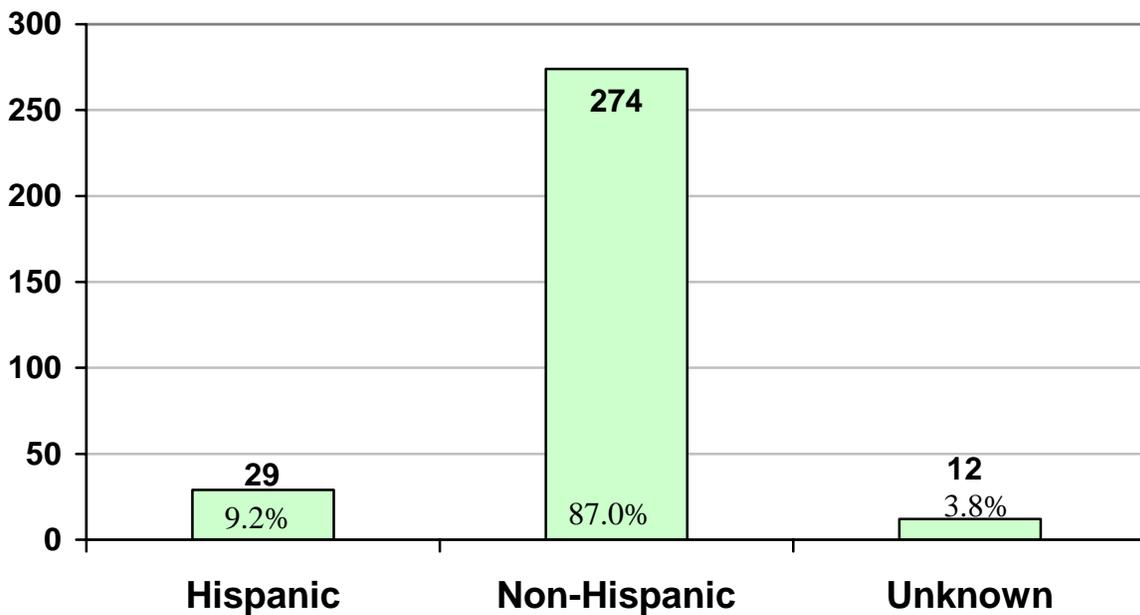
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<sup>1</sup> Based on Federal definition, Hispanic or Latino is identified as ethnicity rather than race. Providing race and ethnicity information is optional for DHS clients.

### March 2011 Re-engagement Review Race Data - 315 Total Clients



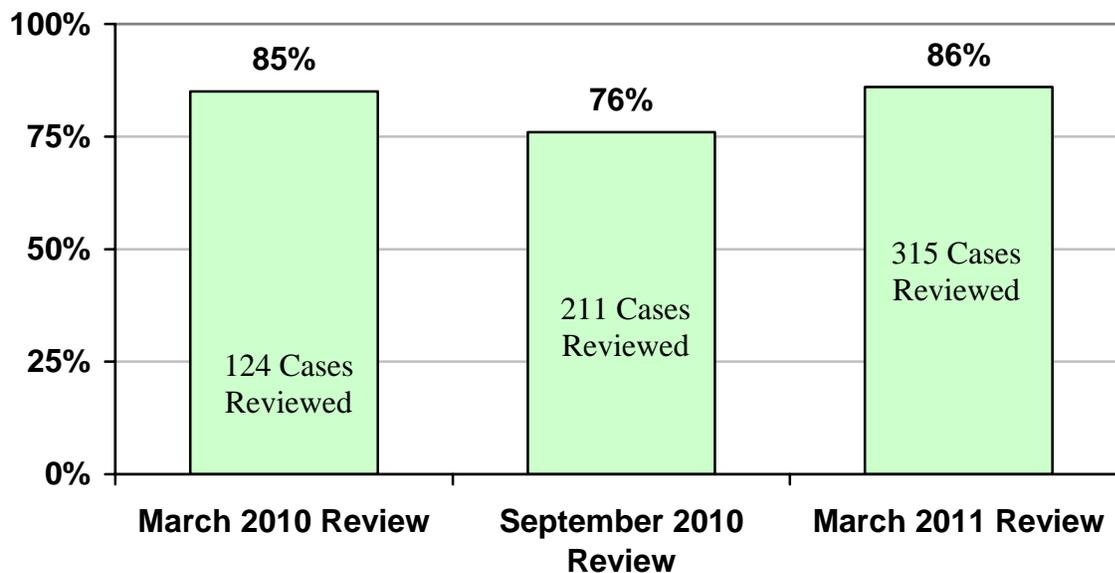
### Ethnicity - Hispanic, Non-Hispanic and Unknown



## Results - Re-Engagement Process

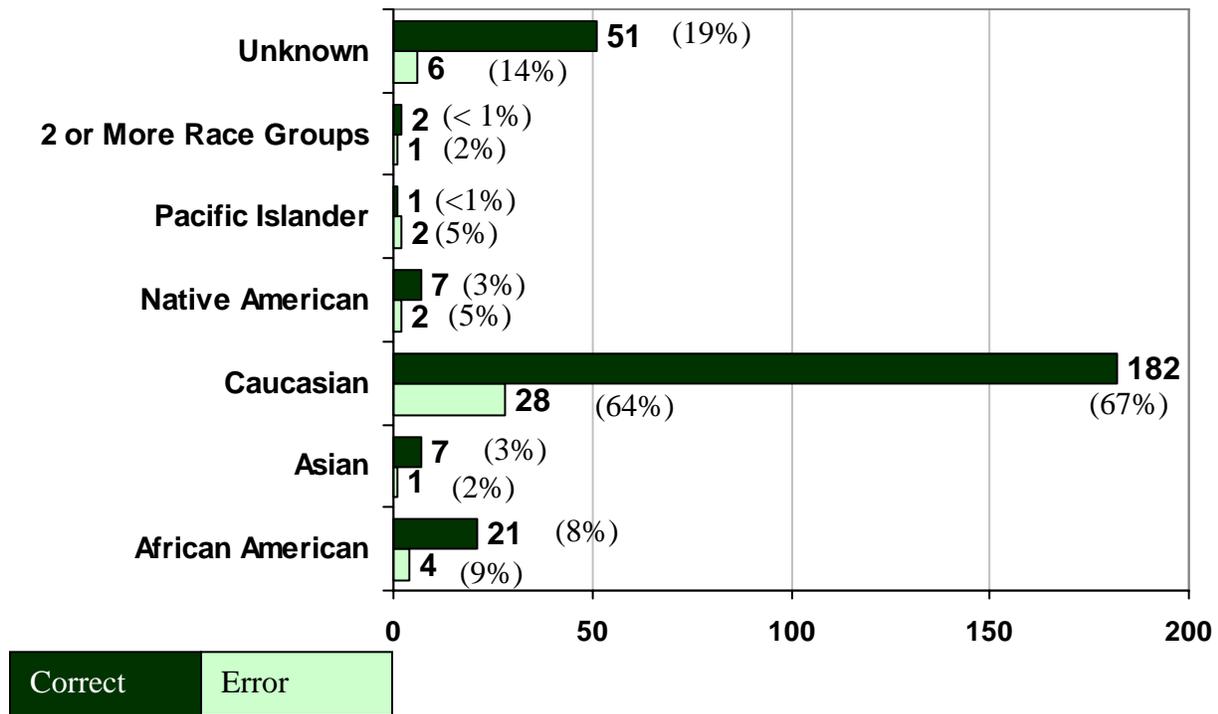
The chart below displays the percentage of cases where a disqualification was appropriately applied as compared to the two previous re-engagement reviews. 86 percent (271 out of 315) of the cases reviewed had the disqualification applied correctly. This percentage represents an increase of 10 percentage points over the September 2010 review.

**Percent of cases with Correct Process**

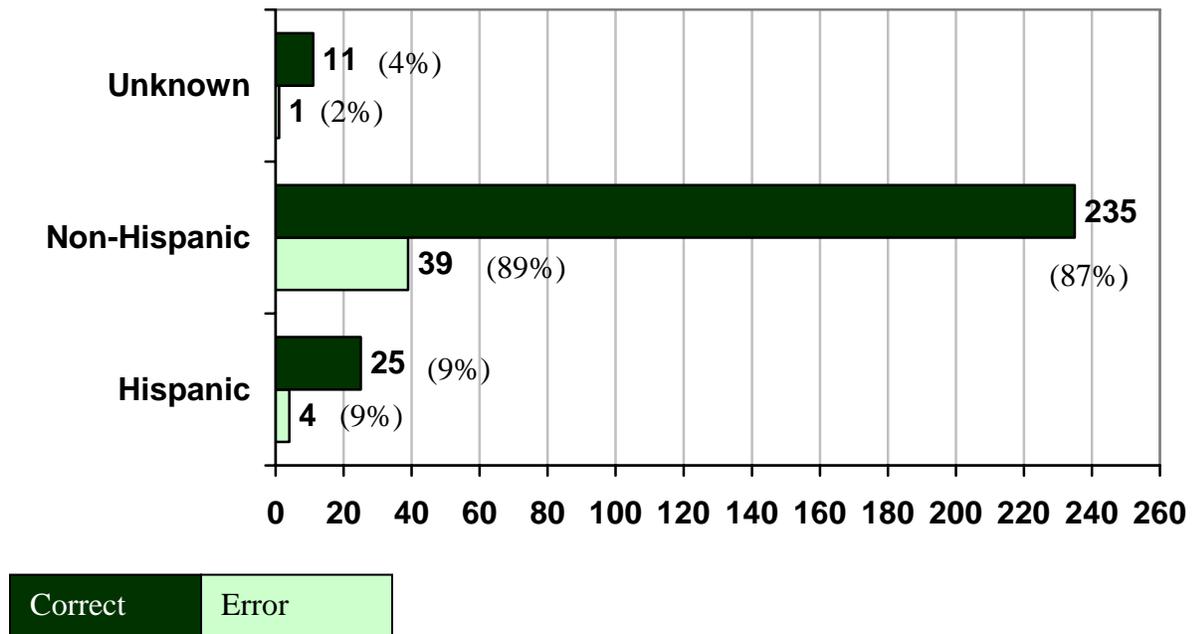


The charts below display the number of disqualifications applied correctly or in error by race and ethnicity. The charts also include the percent of disqualifications applied correctly and in error by race and ethnicity. The percent in each category represents a percentage of the total disqualifications correctly applied (271 cases) or those applied in error (44 cases).

### Disqualifications by Race - Correct or Error



### Disqualifications by Ethnicity - Correct or Error



### **Cases with Disqualifications applied in Error**

The cases with disqualifications applied with error had their disqualifications removed. There were numerous reasons why a disqualification was removed. The table below displays the reasons, which resulted in disqualification removals during the September 2010 and March 2011 reviews.

<b>Reason for Removal <sup>2</sup></b>	<b>September 2010</b>		<b>March 2011</b>	
	<b>51 cases</b>	<b>Percent</b>	<b>44 cases</b>	<b>Percent</b>
<b>Accommodations</b> (No record of a needed accommodation being offered)	2	4%	4	9%
<b>Assessment/Evaluation</b> (No record of required assessment/evaluation being offered)	12	24%	1	2%
<b>Child Safety review</b> (no record of child safety review with Child Welfare)	2	4%	4	9%
<b>Client re-engaged</b> (client re-engaged and was cooperating with plan)	0	0%	0	0%
<b>Disabilities</b> (No record of disability issues being considered)	10	20%	3	7%
<b>Domestic Violence</b> (No record of domestic violence being considered)	6	12%	4	9%
<b>DQ4<sup>3</sup> Requirements</b> (No record of DQ4 requirement being met)	2	4%	2	5%
<b>New DQ Instance: Local Team Staffing</b> (No record of review team staffing)	1	2%	4	9%

<sup>2</sup> The percentages represent the percent of cases with a disqualification removed in which this particular reason for the removal was discovered. A single case may have had multiple reasons for removal and any single reason would have resulted in the disqualification being removed.

<sup>3</sup> DQ4 constitutes full-family sanction. The additional requirements before full-family sanction are that the department attempt a home visit and discuss with the client alternative resources should the TANF grant end.

Reason for Removal <sup>2</sup>	September 2010		March 2011	
	51 cases	Percent	44 cases	Percent
<b>Continuing DQ: Local Team Staffing</b> (No record of review team staffing on continuing non-cooperation)	11	22%	8	18%
<b>Required notices</b> (No record of required notices being sent)	6	12%	8	18%
<b>Rights and Responsibilities form</b> (DHS 7819 not located)	0	0%	11	25%
<b>Rules</b> (OARs governing the Re-engagement process were not followed)	9	18%	11	25%
<b>Screening</b> (No record of required screenings being offered or re-offered)	13	25%	7	16%

### ***Improvements***

- **Appropriate application of disqualification:** The number of cases to review increased by 104 or 49 percent over the past review. Staff were able to increase their accuracy, while at the same time re-engage more clients.
- **Assessments:** When a screening, or other indicator, identifies a need for additional assessment or evaluation, DHS must offer the assessment or evaluation to the client.

The September 2010 review found 12 of 51 cases had a disqualification removed because there was no evidence a needed assessment was offered. The March 2011 review saw continued improvement, which accounted for a 22 percentage point decrease in occurrences. There was 1 of 44 cases where the disqualification was removed due to a needed assessment not being offered. The occurrence in this category has significantly decreased.

- **Disabilities:** Understanding the barriers a client faces is essential to providing appropriate services. DHS must consider if an aspect of a client's disability had an impact on the ability of the client to participate in the program.

The percentage of occurrences in this category was significantly lower than the previous review. The current review found 7 percent (3 of 44) of cases had no record disability issues were considered; the September 2010 review saw 20 percent (10 of 51 cases) of the cases.

- **Domestic Violence:** Domestic violence (DV) significantly impacts an individual's ability to participate. DHS must consider the possibility that known or suspected DV is negatively impacting the ability of an individual to participate. This consideration must be documented in the re-engagement process.

The September 2010 review had 6 of 51 cases in which there was no evidence domestic violence was considered prior to applying the disqualification. The current review saw improvement. There were 4 of 44 cases where there was no evidence domestic violence was considered prior to the review. This represents a decrease in occurrences of 3 percentage points.

- **Continuing DQ: Local Staffing on continuing non-cooperation:** After a disqualification has been determined appropriate and applied, if there are no changes and the client continues not to cooperate, the disqualification will automatically advance to the next level. Prior to the disqualification progressing, there must be a local staffing to determine if the disqualification is still appropriate.

The percentage of occurrences in this category continued to improve. In the September 2010 review there were 11 of 51 cases representing 22 percent of occurrences. The percentage of occurrences decreased to 18 percent (8 of 44 cases) during the March 2011 review.

- **Screening:** Before imposing a disqualification, DHS must ensure all screenings for barriers have been offered. These include alcohol and drug, learning needs, mental health, physical health, domestic violence and family stability (as per policy).

The September 2010 review found 13 of 51 of the cases where the disqualification was removed, there was no record screenings had been offered. This represented 25 percent of occurrences. In March 2011 the percentage of occurrences decreased by 9 percentage points and impacted only 7 of 44 cases.

## ***Difficulties***

While there have been significant improvements, some areas saw increases or no change in the percentage of occurrences, which caused a disqualification to be removed.

- **Accommodations:** DHS must provide reasonable accommodations in order for an individual to participate in program requirements. In order to apply a disqualification staff must determine whether or not accommodations are needed. If there are needed accommodations, staff must determine if they were provided and if provided whether they were appropriate.

The percentage of occurrences in this category changed from 4 percent (2 of 51 cases) in September 2010 to 9 percent (4 of 44 cases) in the March 2011 review.

- **Child Safety:** Child safety reviews are required prior to each level of disqualification. The review consists of contact with Child Welfare to determine if there is a risk to the child or children in the event a disqualification is applied.

The percentage of occurrences increased by 5 percentage points from the September 2010 review. In September 2010, 2 of 51 cases had child safety as one of the reasons the disqualification was overturned. In the current review there were 4 of 44 cases.

- **New DQ Instance: Local Team Staffing prior to disqualification:** Prior to a disqualification being applied, a local staffing must take place to determine if any barriers were preventing the individual from meeting the program requirements. The local staffing team includes DHS staff, partners,

and professionals such as mental health specialist, nurse, Family Support & Connections, etc.

The percentage of occurrences in this category increased by 7 percentage points over the September 2010 review. In September there was 1 of 51 cases where this category was one of the reasons the disqualification was removed. In this review there were 4 of 44 cases.

- **Required Notices:** DHS must send all required notice prior to applying a disqualification. They include such notices as the re-engagement appointment, grant reduction, and full family sanction.

The percentage of occurrences in this category continued to increase. In the September 2010 review 6 of 51 cases or 12 percent had the disqualification reversed due to no evidence of the required notice being provided to the client. The March 2011 review had 8 of 44 cases or 18 percent where there was no evidence of a required notice being sent. This represents an increase of 6 percentage points.

- **Rights and Responsibilities:** The DHS 7819 is the client's rights and responsibilities form. This form explains to the individual about their rights and responsibilities relating to the TANF/JOBS program.

The percentage of cases where there was no evidence of a current (within the past 12 months prior to the re-engagement) DHS 7819 increased from zero percent to 25 percent. There were 11 of 44 cases where the absence of the DHS 7819 was an issue.

- **Rules:** There are specific OARs governing the re-engagement process. The further explanations of the rules are provided in the Family Services Manual. Districts must follow these rules when conducting re-engagement, specifically when the outcome leads to a disqualification.

During the September 2010 review 18 percent (9 of 51 cases) of the cases had issues with rule violations. The current review saw an increase in occurrences to 25 percent (11 of 44 cases) of the cases reviewed.

## ***Conclusion***

The number of cases with an active disqualification continued to increase. There was a 49 percent increase from the previous review in September 2010 and a 154 percent increase over the March 2010 number. Districts have been provided training and guidance in creating processes to re-engage more clients in the JOBS program, while at the same time focusing on following DHS policies and rules to ensure appropriate application of disqualifications. Intensive Case Consultants (ICCs) and other specialists continue to be an important factor in the re-engagement process.

The review has identified several critical areas, which include:

- Accommodations for individuals with disabilities;
- Rules and policies regarding required notification of client when grants are being reduced; and
- Ensuring that clients are aware of their rights and responsibilities in the JOBS program.

Local offices continue working to improve their re-engagement processes. This is taking place during a time when staffing for the TANF program remains a challenge as TANF caseloads continue to grow.

The Governor's Balanced Budget includes a modification to the re-engagement and disqualification process. The 2011 Legislature is currently debating options for the TANF and JOBS program in the 2011-13 biennium with anticipated limited availability of funding and resources.