

TANF/JOBS Program Re-Engagement Review – October 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.

Overview

The biannual review, conducted for the month of October 2011¹, included all TANF cases with an active disqualification. A total of 30 cases were included as part of this review. This represents approximately 0.13 percent of the mandatory TANF population as of September 2011². In March 2011, there were 315 cases reviewed, which represented 1.28 percent of the mandatory TANF population. The October review saw a 285 case decrease from the March 2011 review.

¹ October 2011 was used for the review instead of September 2011. The reason for this change was due to rule changes, which took effect on October 1, 2011. The department must report to the legislature how changes in HB2049 impacted our clients. Using October as the review month would help assess these impacts.

² October 2011 mandatory TANF client data was not available at the time this report was produced. September 2011 data was used.

The significant reduction in the number of cases with a disqualification can be attributed to the following:

Reductions to the JOBS Program

In July 2011, the Job Opportunity and Basic Skills (JOBS) program experienced a reduction in funding. The reduction cut program services and supports in half. This meant that activities and support services to participate were greatly impacted.

In order to prioritize services clients were assessed to determine an appropriate Service Level (SL). If a client had been disqualified but was determined to be in SL3 (not work ready) the disqualification in most instances was removed. The reduction also impacted the availability of activities and support services. If an activities or support services to support the activity were not available when a disqualified client re-engaged the disqualification was removed.

Administrative Rule Change

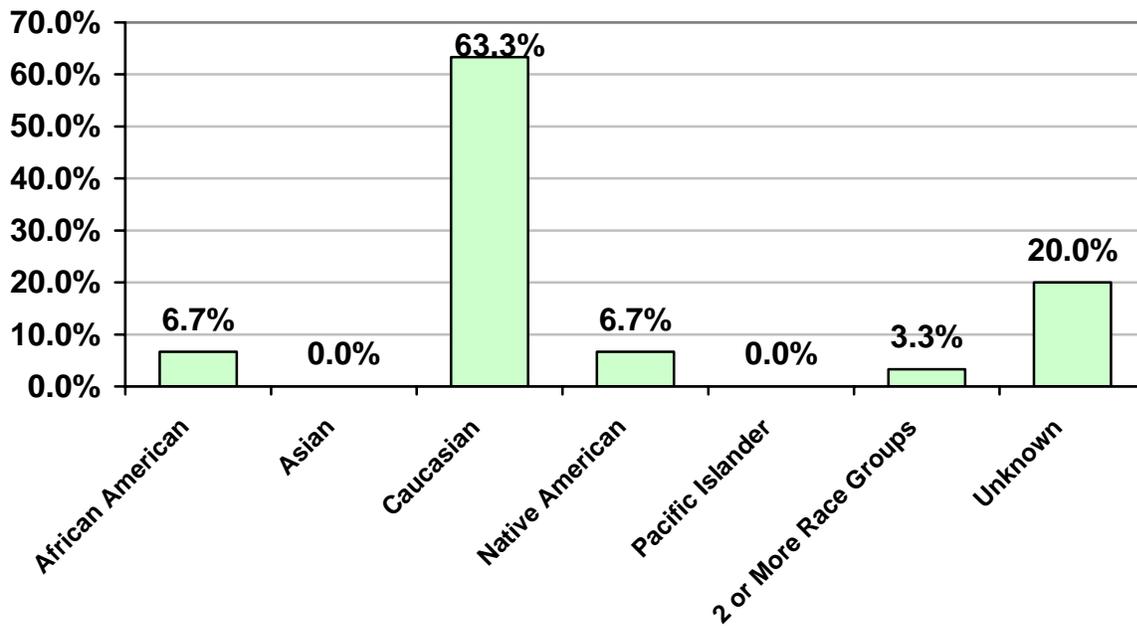
On July 2011, OAR 461-130-0310 was amended. This rule identifies classifications of participation to include mandatory, exempt and volunteers. The rule was amended to add a caretaker relative in a one parent household with a child under two years old to those clients who are exempt from participation and disqualification. In June 2011, approximately 30 percent (85 of 280 clients) of the total disqualifications were single clients with a child under two years old. These disqualifications were removed in July 2011 as the client was now exempt from disqualification.

October 2011 Review – Race and Ethnicity

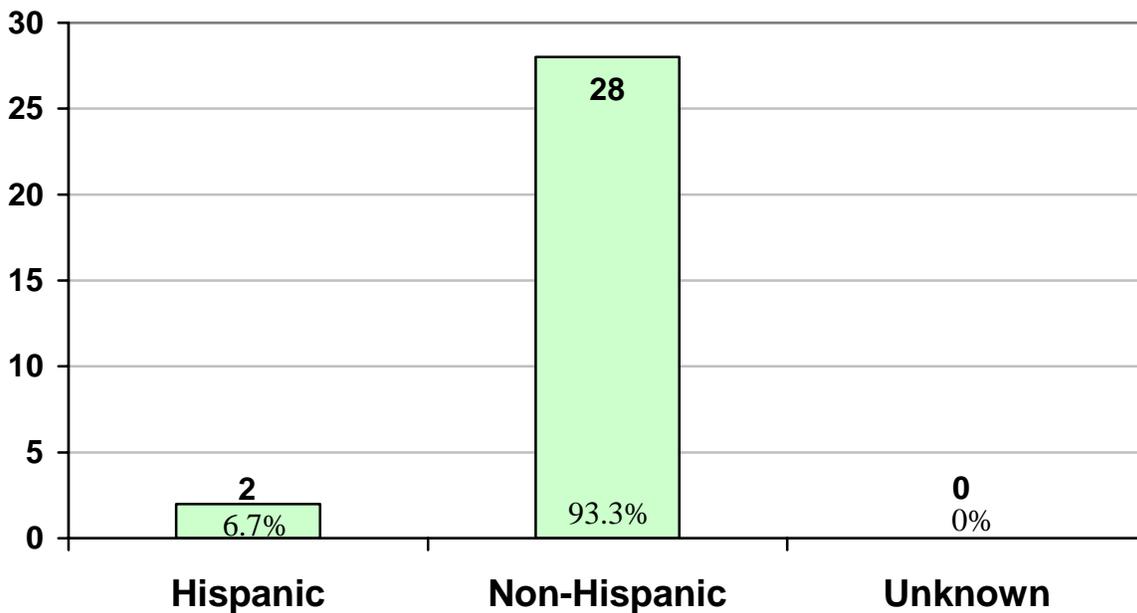
As with past reviews, race and ethnicity data was included. The chart below, displays the race and ethnicity information relative to the 30 clients³.

³ Based on Federal definition, Hispanic or Latino is identified as ethnicity rather than race. Providing race and ethnicity information is optional for DHS clients.

October 2011 Re-engagement Review Race Data - 315 Total Clients



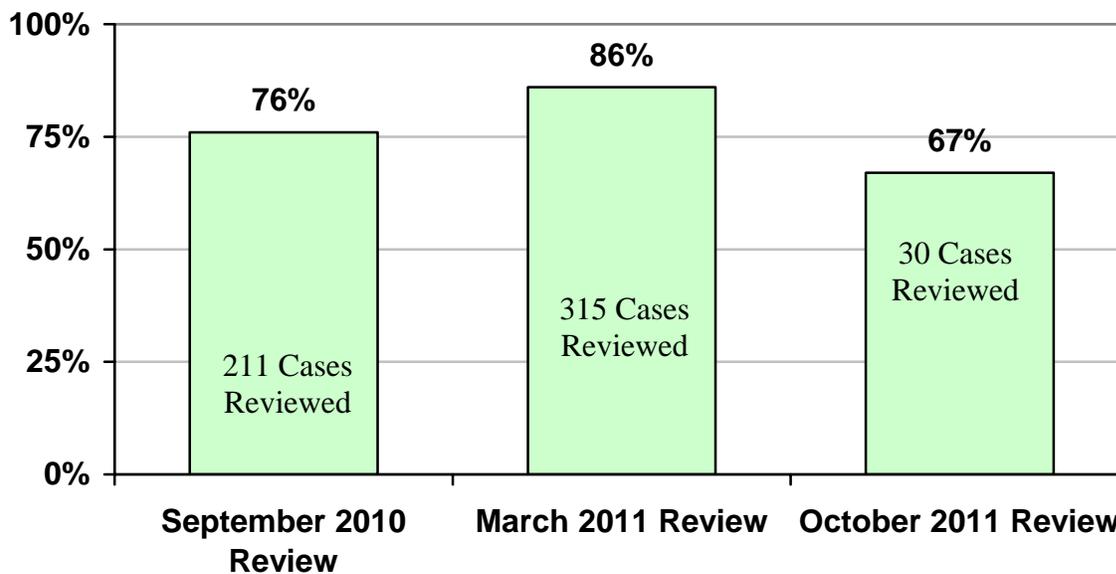
Ethnicity - Hispanic, Non-Hispanic and Unknown



Results - Re-Engagement Process

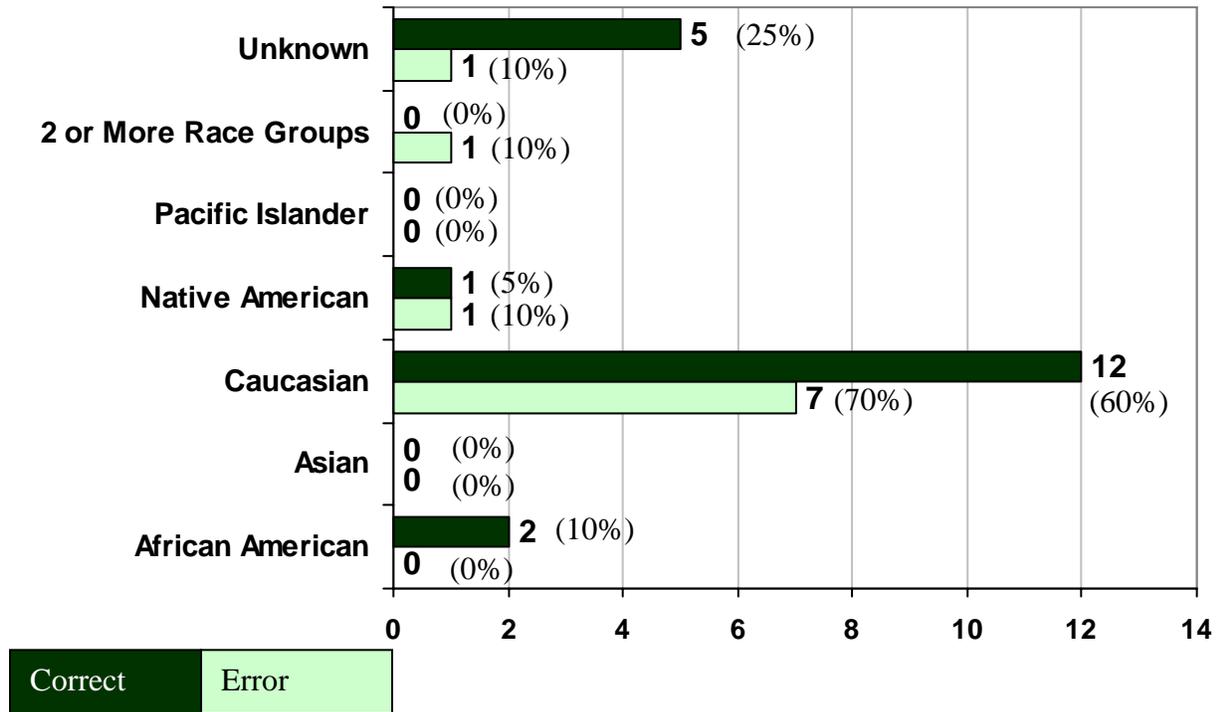
The chart below displays the percentage of cases where a disqualification was appropriately applied as compared to the two previous re-engagement reviews. 67 percent (20 out of 30) of the cases reviewed had the disqualification applied correctly. This percentage represents a decrease of 19 percentage points over the March 2011 review.

Percent of cases with Correct Process

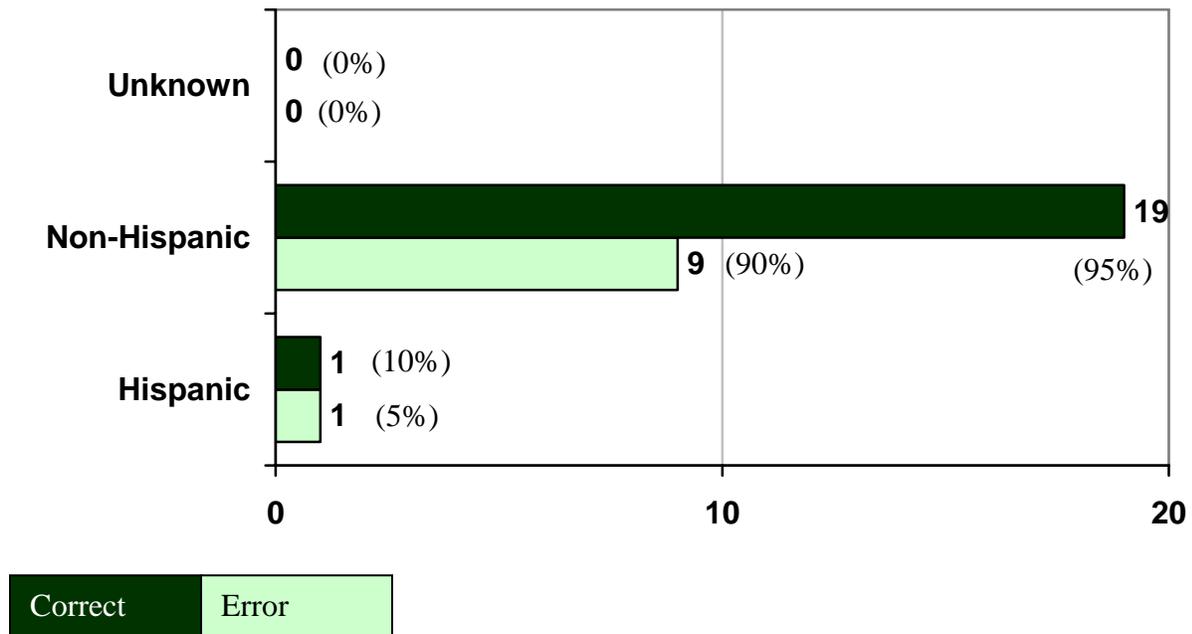


The charts below display the number of disqualifications applied correctly or in error by race and ethnicity. The charts also include the percent of disqualifications applied correctly and in error by race and ethnicity. The percent in each category represents a percentage of the total disqualifications correctly applied (20 cases) or those applied in error (10 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 March 2011 and October 2011 reviews.

Reason for Removal ⁴	March 2011		October 2011	
	44 cases	Percent	10 cases	Percent
Accommodations (No record of a needed accommodation being offered)	4	9%	0	0%
Assessment/Evaluation (No record of required assessment/evaluation being offered)	1	2%	0	0%
Child Safety review (no record of child safety review with Child Welfare)	4	9%	5	50%
Client re-engaged (client re-engaged and was cooperating with plan)	0	0%	0	0%
Disabilities (No record of disability issues being considered)	3	7%	0	0%
Domestic Violence (No record of domestic violence being considered)	4	9%	0	0%
DQ4⁵ Requirements (No record of DQ4 requirement being met)	2	5%	5	50%
New DQ Instance: Local Team Staffing (No record of review team staffing)	4	9%	0	0%

⁴ 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.

⁵ 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 ⁴	March 2011		October 2011	
	44 cases	Percent	10 cases	Percent
Continuing DQ: Local Team Staffing (No record of review team staffing on continuing non-cooperation)	8	18%	5	50%
Required notices (No record of required notices being sent)	8	18%	0	0%
Rights and Responsibilities form (DHS 7819 not located)	11	25%	0	0%
Rules (OARs governing the Re-engagement process were not followed)	11	25%	10	100%
Screening (No record of required screenings being offered or re-offered)	7	16%	0	0%

Improvements

- **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 9 percent (4 of 44 cases) in March to 0 percent (0 of 10 cases) in the October 2011 review.

- **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 March 2011 review showed improvement over the September 2010. This improvement continued as there were no cases where an assessment was needed and not offered.

- **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 continued to decrease from previous reviews. The current review found 0 percent (0 of 10) of cases had issues where disability issues were not considered; the March 2011 review saw 9 percent (3 of 44 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 March 2011 review had 4 of 44 cases in which there was no evidence domestic violence was considered prior to applying the disqualification. There were 0 of 10 cases where there was evidence domestic violence, which was not considered.

- **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 decreased to zero percent from the March 2011 review.

- **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 decreased to zero cases. In the March 2011 review 8 of 44 cases or 18 percent had the disqualification reversed due to no evidence of the required notice being provided to the

client. The October 2011 review had 0 of 10 cases where there was no evidence of a required notice being sent.

- **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 decreased from 25 percent to zero percent.

- **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 October 2011 review found 0 of 10 cases where the disqualification was removed, there was no record screenings had been offered. In March 2011 the percentage of occurrences impacted 7 of 44 cases or 16 percent.

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.

- **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 from 9 percent in March 2011 to 50 percent (5 of 10) of the cases in October 2011. This increase is connected to the staff not following rule and policy changes, which occurred on July 1, 2011. In all 5 cases there were no re-engagement staffing completed and this would have resulted in no child safety review.

- **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 saw a significant increase. In the March 2011 review there were 8 of 44 cases representing 18 percent of occurrences. The percentage of occurrences increased to 50 percent (5 of 10 cases) during the October 2011 review.

- **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. There were several rule changes, policy and procedural changes, which took place on July 1, 2011. These changes directly impacted the re-engagement and disqualification process.

During the March 2011 review 25 percent (11 of 44 cases) of the cases had issues with rule or policy violations. The current review saw an increase in occurrences to 100 percent (10 of 10 cases) of the cases reviewed.

Changes in Re-Engagement and Disqualification

On October 1, 2011 changes were made to the re-engagement and disqualification. The modifications were made due to legislation passed (House Bill 2049) during the last session.

Levels and Months of Disqualification

There are two levels of sanction. Level one is the removal of the non-cooperating adult's needs. There are up to three months at level one. The months within this level are indicated by the code DQ1 thru DQ3 (MQ1 – MQ3). Level two is one month. At this level there is a full family sanction. This level is indicated by a DQ4 or MQ4 code.

Re-Engagement

A re-engagement staffing must take place prior to a new instance of non-cooperation or DQ4 or MQ4 (level two). The requirements of the re-engagement remain the same to include a team staffing, child safety review and offering any screenings or assessments. If a disqualification is applied (DQ1 or DQ2) and the client has not re-engaged the disqualification will automatically progress to the next level. The staffing, child safety review, etc. are not needed in these instances. The client will receive notification each month as the disqualification progresses encouraging them to contact their case worker.

Cooperation at Level Two

At the second level, the client has until the end of the month to begin the two week cooperation period. If they do not begin the TANF case closes as the end of the month. When a TANF case closes due to non-cooperation the client is ineligible for TANF for two consecutive months.

Conclusion

The number of cases with an active disqualification significantly decreased. The number of disqualified clients dropped from 315 to 30. As described above, this decrease was attributed to the reduction in JOBS services and supports, as well as change in Oregon Administrative Rules. The decrease in disqualification is not attributed clients engaging in the JOBS program as there are very limited activities and services available.

New training has been developed and is being provided to staff. As staff become better informed of the changes and incorporate them into their local process they will be able to attempt to engage more clients in the JOBS program. It is expected the number of disqualified individuals will increase over the next six months.

Intensive Case Consultants (ICCs) and Disability Analysts continue to be an important factor in the re-engagement process. The reduction in JOBS funding has resulted in most districts losing access to alcohol and drug, and mental health specialists. ICC's and DA's will help to bridge the gap left by the A&D and mental health specialist. There are still services available through a client's medical, however there are no support services to provide transportation or child care while attending treatment.

The review has identified several critical areas, which will need attention and a strategy to ensure a better transition when rules and policy changes are to be implemented. These areas include:

- Rules and policies changes;
- Better communication;
- Training prior to implementation.

Local offices continue working to improve and redesign their re-engagement processes to fit into the new rules and policies. This is taking place during a time when staffing for the TANF program remains a challenge as TANF caseloads continue to grow and funding for program services and supports has been cut in half.

Monitoring re-engagement and disqualification will continue to strengthen local processes. Strong local processes will help provide fair and accurate application of rules and policies to the families served by the TANF program.