

TANF/JOBS Program Re-Engagement Review – September 2010

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.

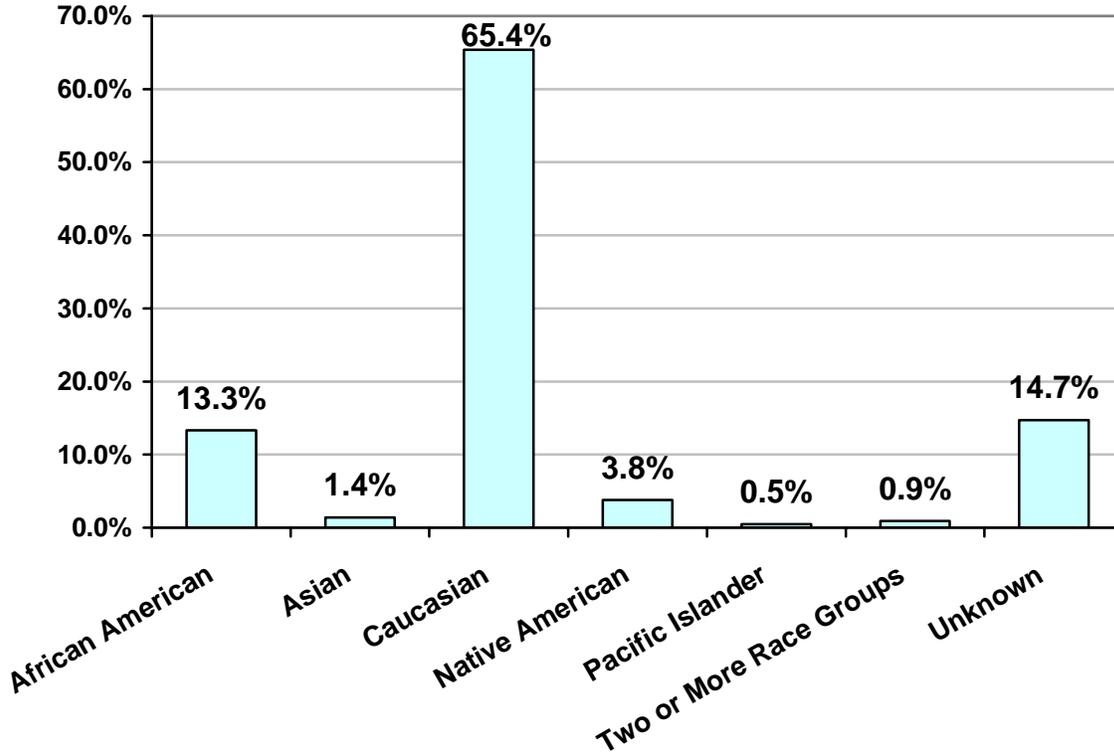
September 2010 Review – Race and Ethnicity

The September 2010 biannual review included all TANF cases with an active disqualification as of September 1, 2010. A total of 211 cases were included as part of this review. This was an increase of 87 cases from the March 2010 review.

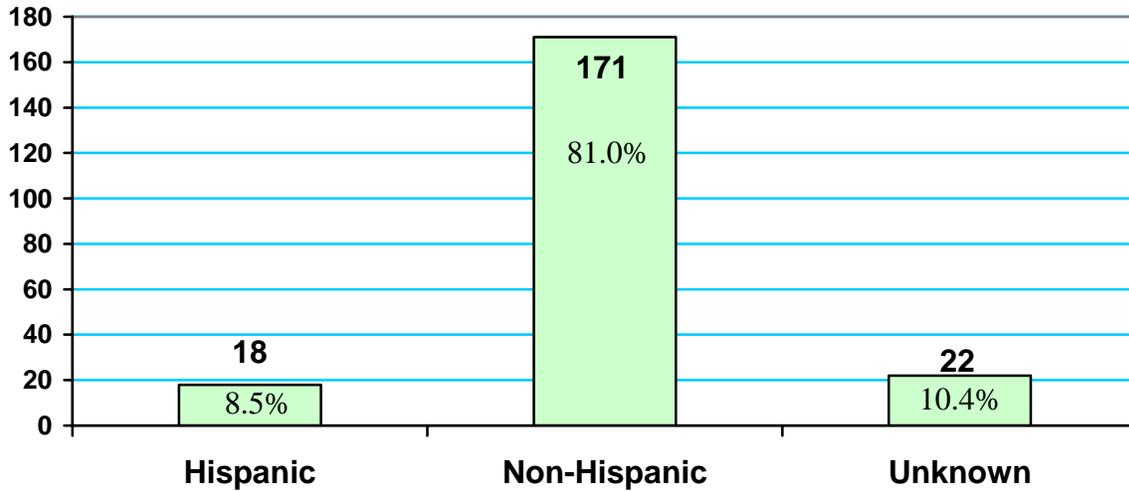
As with the March 2010 review, race and ethnicity data was included. The two charts below display the race and ethnicity information relative to the 211 clients. The information is displayed in percentage of total persons with an active disqualification¹.

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

**September 2010 Re-engagement Review
Race Data - 211 Total Clients**



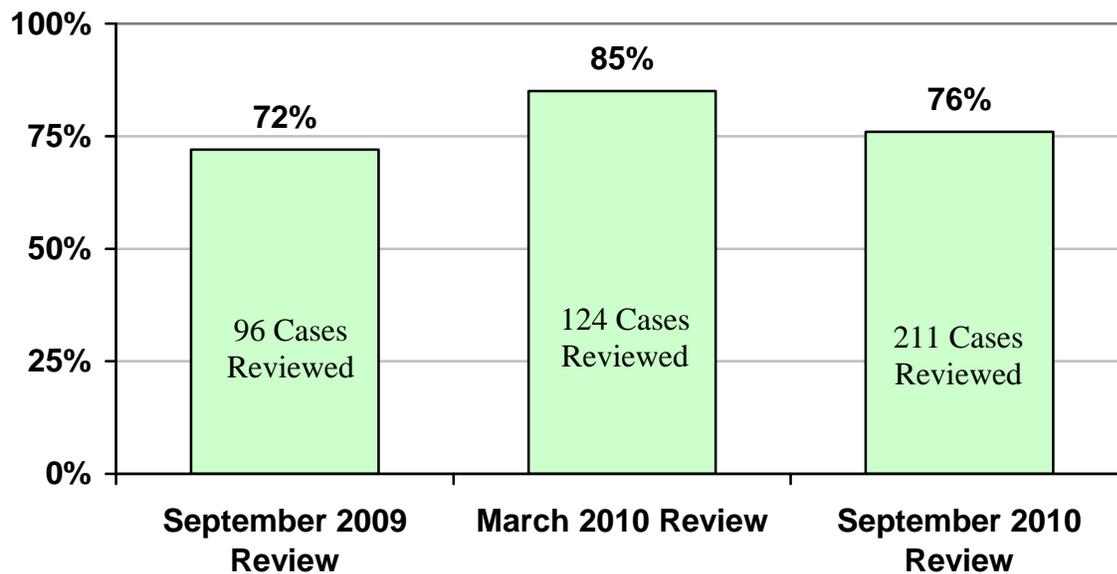
Ethnicity - Hispanic, Non-Hispanic and Unknown



Results - Re-Engagement Process

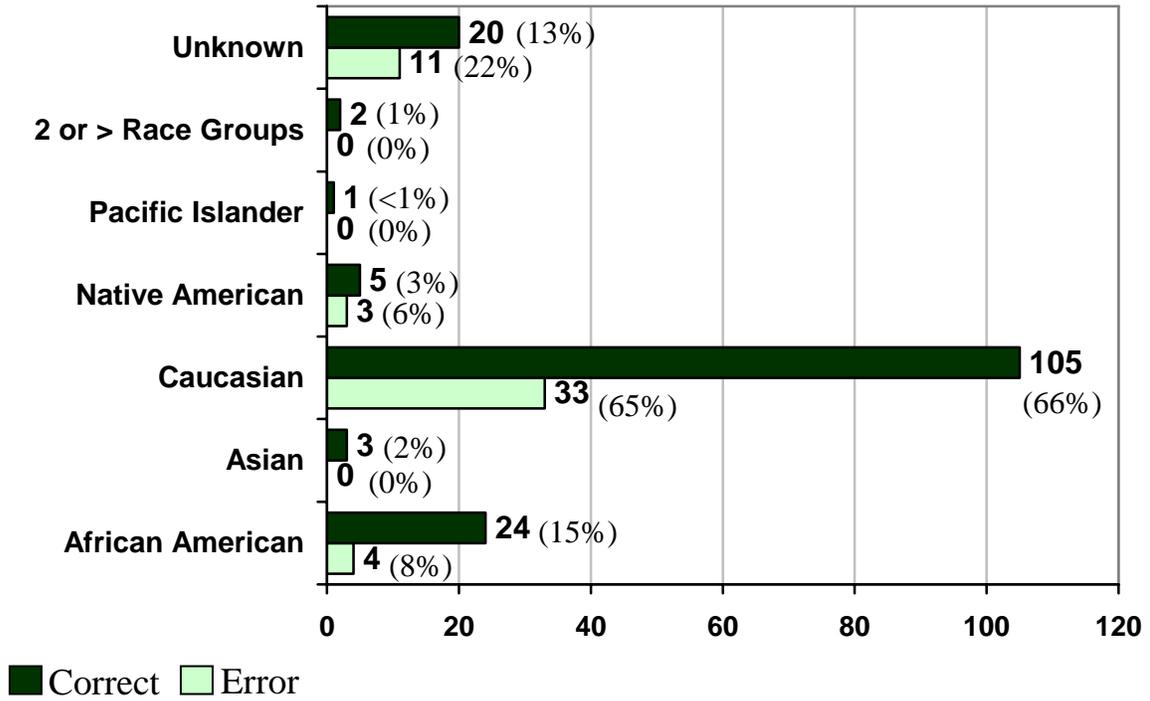
The chart below displays the percentage of cases where a disqualification was appropriately applied as compared to the two previous re-engagement reviews. Approximately 76 percent (160 out of 211) of the cases reviewed had the disqualification applied correctly. This percentage represents a decrease of 9 percentage points over the March 2010 review and a 4 percentage point increase over the September 2009 review.

Percent of cases with Correct Process

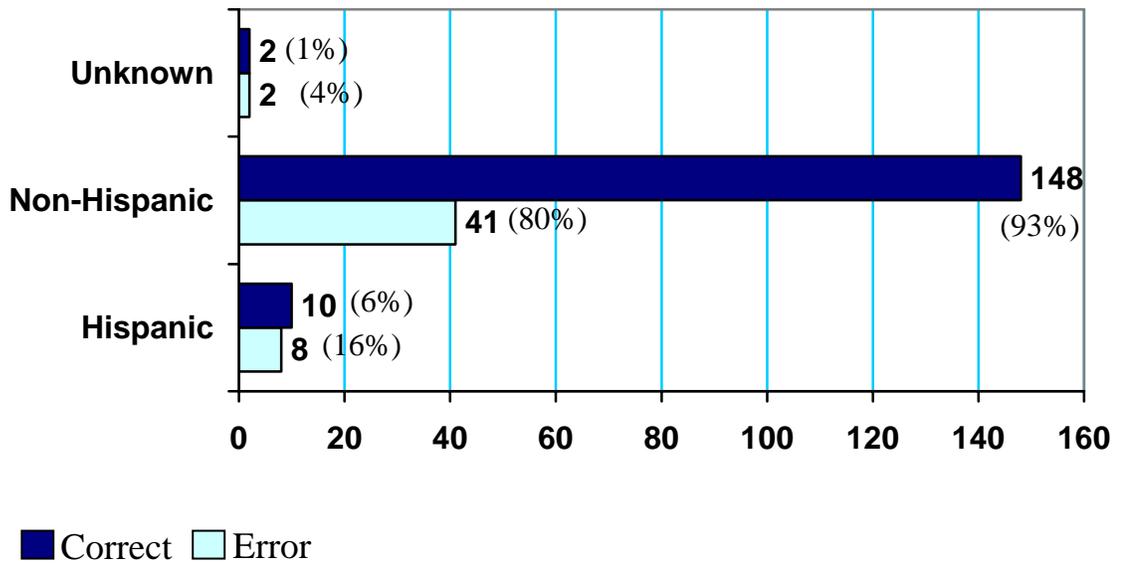


There were a total of 160 clients with a disqualification applied correctly. The charts below display the number of disqualifications applied correctly or in error by race and ethnicity. The charts also include the percent of disqualifications applied correctly and in error by race and ethnicity. The percent in each category represents a percentage of the total disqualifications correctly applied (160 cases) or those applied in error (51 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 2010 and September 2010 reviews.

Reason for Removal ²	March 2010		September 2010	
	19 cases	Percent	51 cases	Percent
Accommodations (No record of a needed accommodation being offered)	2	11%	2	4%
Assessment/Evaluation (No record of required assessment or evaluation being offered)	5	26%	12	24%
Child Safety review (no record of child safety review with Child Welfare)	5	26%	2	4%
Client re-engaged (client re-engaged and was cooperating with plan)	0	0%	0	0%
Disabilities (No record of disability issues being considered)	2	11%	10	20%
Domestic Violence (No record of domestic violence being considered)	0	0%	6	12%

² 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.

Reason for Removal ²	March 2010		September 2010	
	19 cases	Percent	51 cases	Percent
DQ4 ³ Requirements (No record of DQ4 requirement being met)	0	0%	2	4%
New DQ Instance: Local Team Staffing (No record of review team staffing)	2	11%	1	2%
Continuing DQ: Local Team Staffing (No record of review team staffing on continuing non-cooperation)	8	42%	11	22%
Required notices (No record of required notices being sent)	0	0%	6	12%
Rights and Responsibilities form (DHS 7819 not located)	0	0%	0	0%
Rules (OARs governing the Re-engagement process were not followed)	0	0%	9	18%
Screening (No record of required screenings being offered or re-offered)	8	42%	13	25%

³ 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.

Improvements

Improvements were seen in four important areas. They include:

- **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 improved by 9 percent over the March 2010 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 improved by 22 percent from the March 2010 review. In March 2010, 5 of 19 cases had child safety as one of the reasons the disqualification was overturned. In the current review there were 2 of 51 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 improved by 9 percent over the March 2010 review. In March there were 2 of 19 cases where this category was one of the reasons the disqualification was removed. In this review there was 1 of 51 cases.

- **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 advancing, there must be a local staffing to determine if the disqualification is still appropriate.

The percentage of occurrences in this category improved by 20 percent from the March 2010 review. In March 8 of 19 cases where a disqualification was removed included no local staffing on continuing non-cooperation as one of the reasons the disqualification was removed. In September there were 11 of 51 cases, which represented a 20 percent decrease in occurrences.

- **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 March 2010 review found that in 8 of 19 of the cases, where the disqualification was removed, there was no record that screenings had been offered. In September 2010 the percentage of occurrence improved by 17 percent and was impacted 13 of 51 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.

- **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 2010 review found 5 of 19 cases had a disqualification removed because there was no evidence that an identified assessment was offered. The September 2010 review saw a slight improvement of 2 percent. There were 12 of 51 cases where the disqualification was removed. The occurrence in this category remains high. Continued training, technical assistance and coaching are needed in the area of assessments.

- **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 program.

The percentage of occurrences in this category nearly doubled from the March 2010 review. The current review found 20 percent (10 of 51 cases) of cases had no record that disability issues were considered; the March 2010 review saw 11 percent (2 of 19 cases) of the cases. As with "Assessments" training, technical assistance, and coaching are needed and should be focused in areas facing the biggest challenges.

- **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 percentage of occurrences has been below 4 percent over the past four reviews. In fact, there were no occurrences during the March 2010 review. However during the current review, there were 6 of 51 cases in which domestic violence was not considered.

- **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 grant closure.

The percentage of occurrences in this category increased from 0 percent (0 of 19 cases) in March 2010 to 12 percent (6 of 51 cases) of the cases in September 2010.

- **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, especially when the outcome leads to a disqualification.

During the March 2010 review 0 percent (0 of 19 cases) of the cases had issues with rule violations. The current review saw an increase in occurrences to 18 percent (9 of 51 cases) of the cases reviewed.

Conclusion

The number of cases with an active disqualification increased from the previous review by 70 percent. Districts who include Intensive Case Consultants (ICCs) and other specialists in the re-engagement process continue to see improvement.

The review has identified several critical areas, which include:

- Assessment for such issues as mental health;
- Disabilities to include cognitive disorders, PTSD, etc;
- Domestic Violence; and
- Policy and Rules covering the re-engagement process.

Overall it is evident local offices are continuously working to improve their re-engagement processes, while staffing for the TANF program remains a challenge as TANF caseloads continue to grow. This review has identified areas, which will need additional training; technical assistance; and coaching in order to improve the process and ensure that disqualifications are applied appropriately.