

TANF/JOBS Program Re-Engagement Review – September 2014

Background

TANF federal regulations require states have policies in place to address when families receiving TANF cash assistance refuse to engage in work or other alternatives. Oregon’s disqualification policy is codified in Oregon Revised Statute 412.009.

Pursuant to ORS 412.009 (6) the Department of Human Services (DHS) must report to the Family Services Review Commission every six months on the status of and outcomes for families for whom TANF cash assistance has been reduced or terminated.

Overview

Oregon’s disqualification policy requires the re-engagement process is completed prior to imposing a new disqualification and before full-family sanction. The goal of this effort is to identify potential barriers to client success in the program, to ensure necessary steps are taken to address those barriers, and to ensure disqualifications are applied correctly. The goal of the re-engagement process is also to re-connect the client in their case plan activities or to identify suitable activities if the current activities are inappropriate.

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.

If the outcome of the re-engagement process results in a disqualification, clients are encouraged to re-engage in order to “lift” the disqualification. A two-week

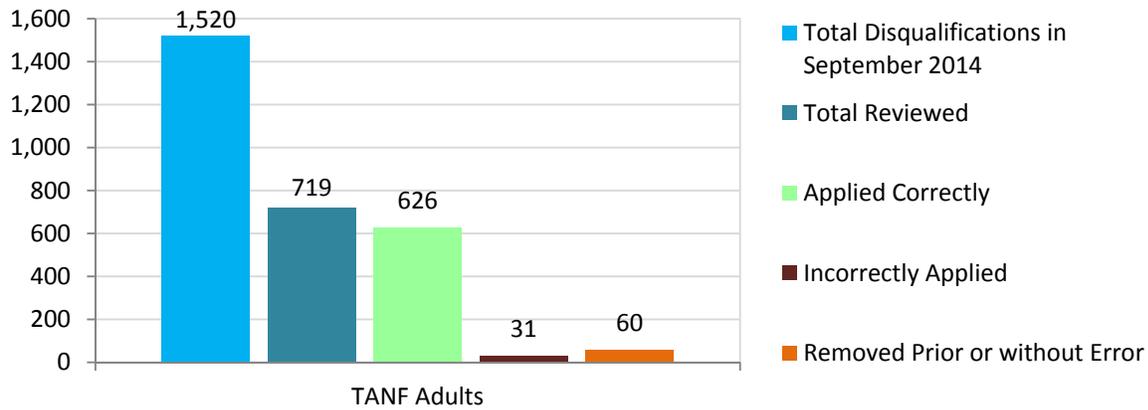
participation period is required to lift the disqualification and upon completion, the family may receive a full TANF grant. There are two levels of disqualification. In the first level, the non-participating adult's portion of the TANF grant is removed. This level can last up to three months unless the client re-connects or re-engages in their case plan activities. The second level of disqualification is full-family sanction, meaning the family does not receive a TANF grant. This level lasts one month, after which the family loses eligibility for TANF for two consecutive months if the client does not re-engage prior to the end of the full family sanction month. If the client begins the two-week participation period prior to the end of the full-family sanction month, TANF benefits are restored upon completion.

September 2014 Review

The September 2014 re-engagement review was conducted using the following cases:

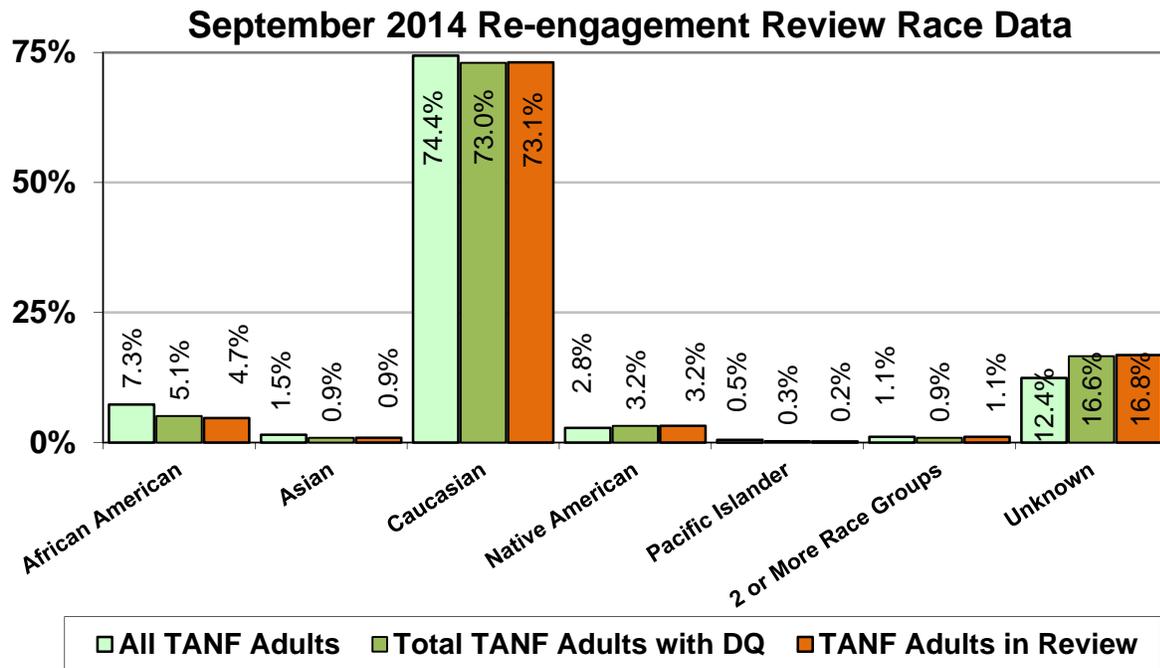
- Approximately 50 percent of a District's adults coded with a DQ1. In past reviews the accuracy rate for this disqualification level was higher than all other levels at 96 percent or better.
- All adults with an active DQ4 coding. This disqualification level had the lowest accuracy rate in past reviews. The accuracy for the September 2013 review was less than 88 percent.
- Approximately 50 percent of a District's adults coded with a DQR. This level of disqualification has also seen higher than average accuracy.
- All adults, not included in the above, with a self-disclosed or documented disability.
- All adults, not included in the above, with domestic violence within the past 6-months.

The review included 719 of 1,520 actively disqualified adults as of September 1, 2014. The 1,520 disqualifications in September 2014 represent approximately 6.9 percent of the adults receiving TANF who are required to participate in case plan activities. This represents a 3.7 percent increase over the last review. Of the 719 disqualified adults, 60 had the disqualification removed prior to the review or without error (no negative impact to the family). These 60 cases are not included in the details below. A total of 659 adults are included in the details. Of the 659 cases reviewed in September 2014, disqualifications were applied correctly 95% of the time.



September 2014 Review – Race and Ethnicity

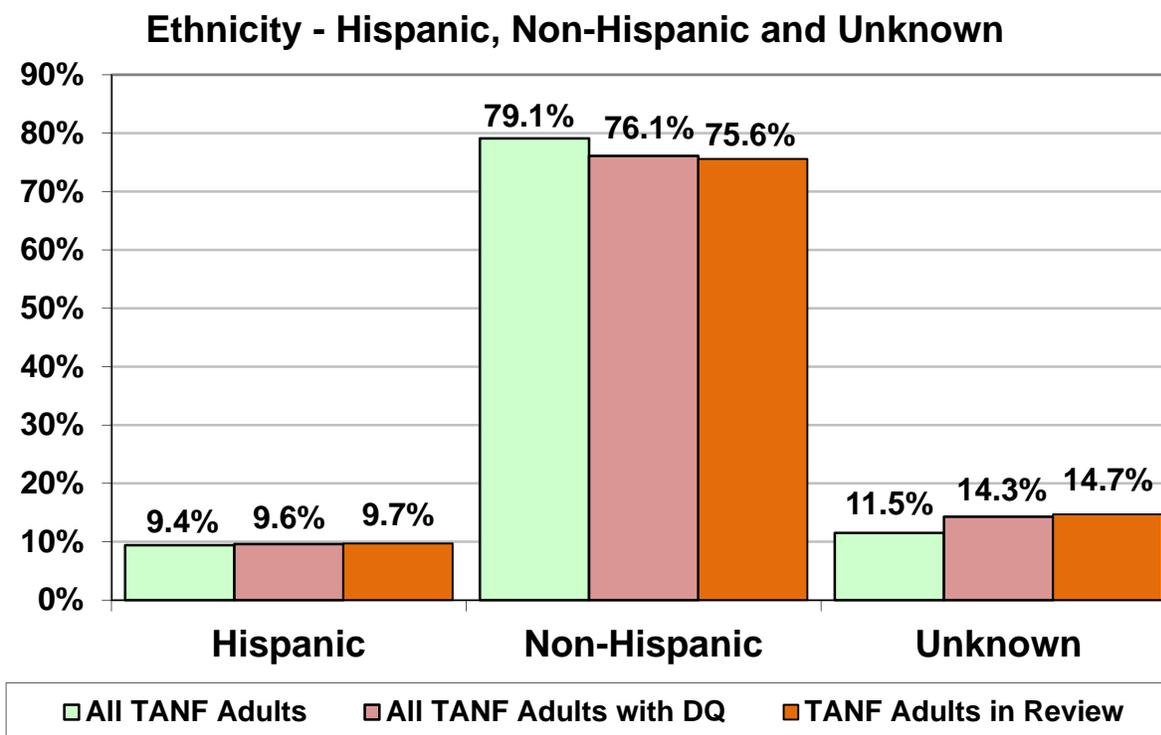
The chart below, displays the race and ethnicity¹ information for all TANF adults, the 659 adults who were included in the review as well as the 1,520 total adults with a disqualification in September.



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.

There was a small difference in percentages among several race groups. A larger difference was seen between the three categories in the “Unknown” group. This is not uncommon as the majority of the “Unknown” group resides in districts, which have had a higher percentage of the state’s total disqualifications.

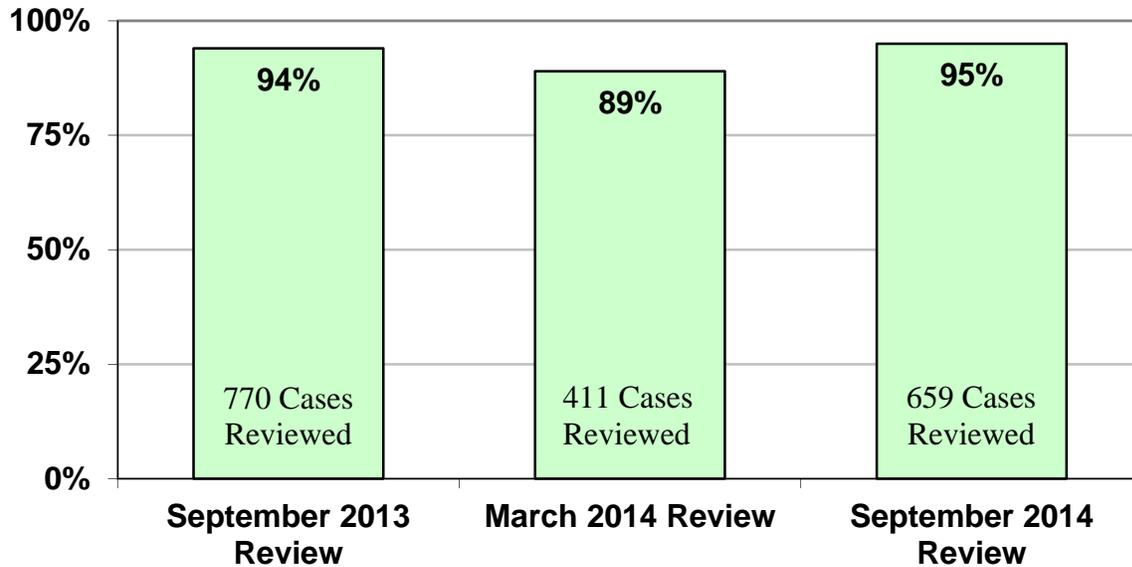
The ethnicity chart shows a difference in the percentage of Hispanic clients disqualified and part of the review (9.7 percent) as compared to the percentage of Hispanic adults receiving TANF (9.4 percent). A contributing factor is the percent of total disqualifications from areas with larger Hispanic populations.



Results - Re-Engagement Process

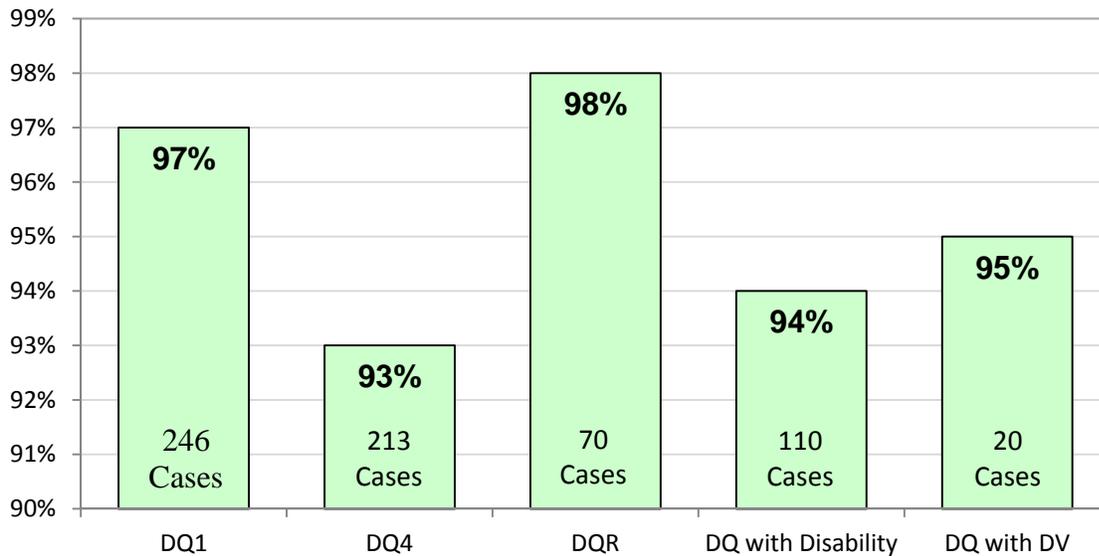
The chart below displays the percentage of September 2014 TANF cases where a disqualification was appropriately applied as compared to the two previous re-engagement reviews. 95 percent (626 out of 659) of the cases reviewed had the disqualification applied correctly. This percentage represents a 6 percent positive change from the March 2014 review.

Percent of cases with Correct Process



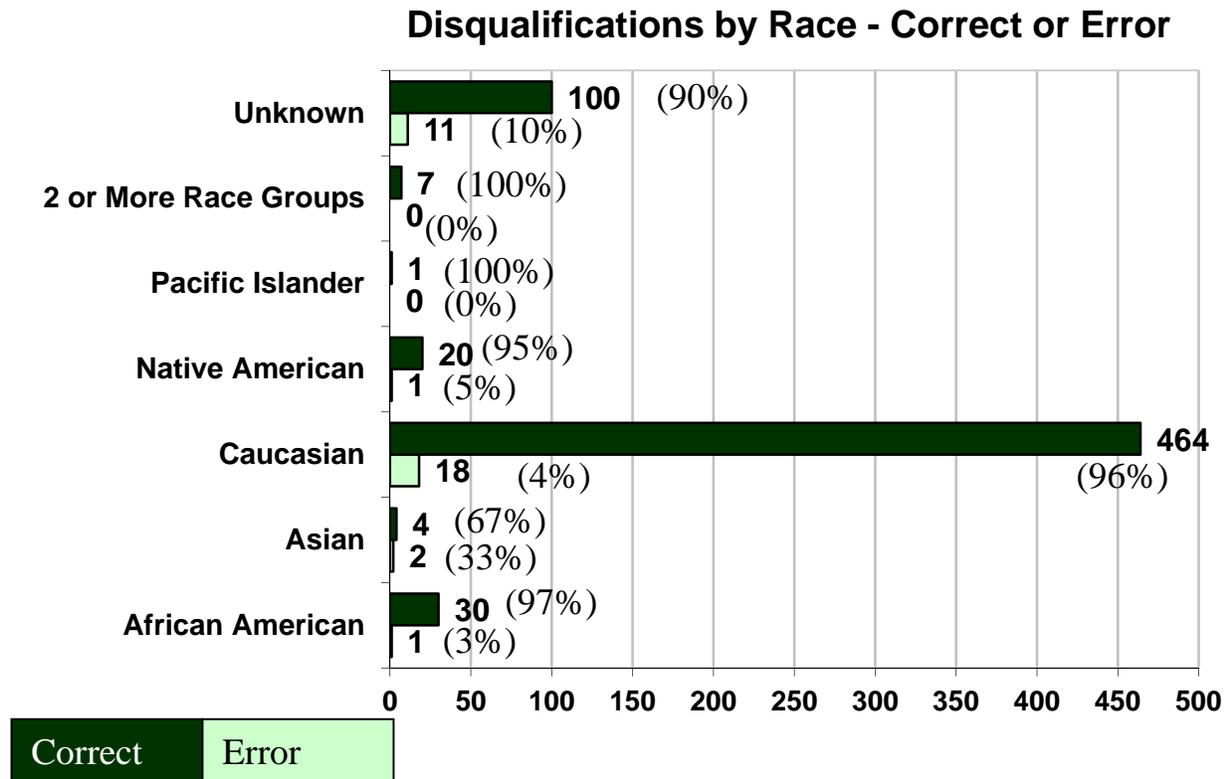
The accuracy rate by disqualification level was equal to:

Accuracy Rate by type of Disqualification

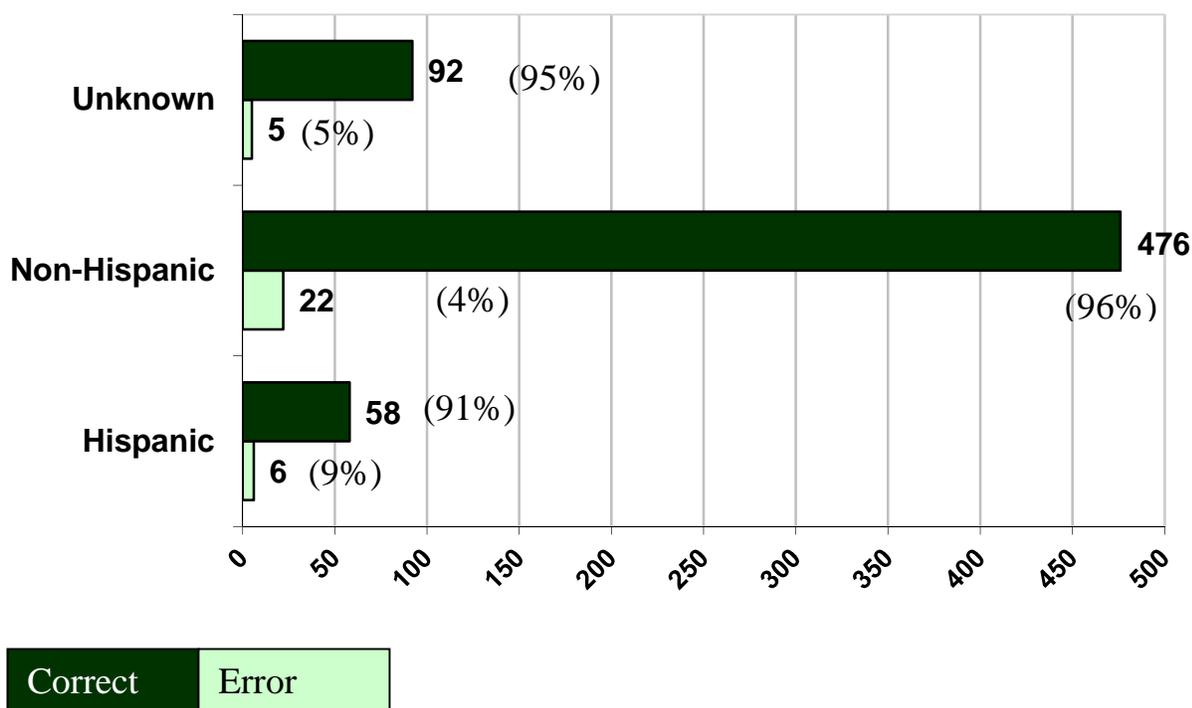


The charts below display the number of disqualifications applied correctly or in error by race and ethnicity. The charts also include the percent of disqualifications

applied correctly and in error by race and ethnicity. The percent in each category represents a percentage of the total disqualifications by the specific race or ethnicity correctly applied versus those applied in error.



Disqualifications by Ethnicity - Correct or Error



Cases with Disqualifications applied in Error

The cases with disqualifications applied in error had the disqualification removed. In some situations multiple disqualifications were removed. There were a total of 33 cases with 55 reasons for removing the disqualification. A case may have had multiple reasons for having the disqualification removed. The table below displays the reasons, which resulted in the removals during the March 2014 and September 2014 reviews.

Reason for Removal ²	March 2013		September 2014	
	46 cases	Percent	33 cases	Percent
Accommodations (No record of a needed accommodation being offered)	9	20%	8	24%

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 2013		September 2014	
	46 cases	Percent	33 cases	Percent
Assessment/Evaluation (No record of required assessment/evaluation being offered)	0	0%	0	0%
Child Safety review (no record of child safety review with Child Welfare)	9	20%	10	30%
Client re-engaged (client re-engaged and was cooperating with plan)	1	2%	0	0%
Continuing DQ: Local Team Staffing (No record of review team staffing on continuing non-cooperation)	22	48%	13	39%
Disabilities (No record of disability issues being considered)	13	28%	8	24%
Domestic Violence (No record of domestic violence being considered)	2	4%	2	6%
DQ4³ Requirements (No record of DQ4 requirement being met)	15	33%	4	12%
Employment (client became employed)	0	0%	0	0%
New DQ Instance: Local Team Staffing (No record of review team staffing)	2	4%	6	18%
Required notices (No record of required notices being sent)	0	0%	0	0%
Rights and Responsibilities form (DHS 7819 not located)	0	0%	0	0%
Rules (OARs governing the Re-engagement process were not followed)	1	2%	2	6%

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.

Reason for Removal ²	March 2013		September 2014	
	46 cases	Percent	33 cases	Percent
Screening (No record of required screenings being offered or re-offered)	0	0%	0	0%
TANF Closed (TANF closed prior to disqualification being applied)	0	0%	2	6%

Improvements

- Client Re-engaged in Program:** When a disqualification is applied, a client has an opportunity to remove the disqualification by cooperating with program requirements. In order to end a disqualification a client must cooperate for two-consecutive weeks in the activity or activities of a new or revised case plan.

The percentage of occurrences in this category during the current review was 0 percent (0 of 33 cases) in September 2014. This represented a slight improvement over the past review, which was at 1 percent (1 of 46 cases) in the March 2014 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 to the second level or DQ4, there must be a local staffing to determine if the disqualification is still appropriate.

The percentage of occurrences in this category decreased from the most recent review. In the March 2014 review there were 22 of 46 cases representing 48 percent of occurrences. The percentage of occurrences decreased to 39 percent (13 of 33 cases) during the September 2014 review.

- 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, which had decreased from September 2013 to March 2014, saw another decrease in September 2014. The September 2014 review found 24 percent (8 of 33 cases) had a disability and no evidence the issue was considered prior to a disqualification. This represented a 3 percent decrease from the March 2014 review (28 percent – 13 of 46).

In March, disability and accommodation training had begun to be provided again to DHS TANF staff and partners. There has been eleven sessions provided over the past eight months. Training will continue to be provided on a regular basis.

- **DQ4 Requirements:** Prior to applying a DQ4, which is a full family sanction meaning there will be no cash grant, DHS must attempt a home visit and a discussion of alternate resource for the family.

The percentage of occurrences in this category during the September 2014 review was 12 percent (4 of 33 cases) compared to 33 percent (15 of 46 cases) in the March 2014 review.

Difficulties

While there have been improvements, some areas saw increases 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 20 percent (9 of 46 cases) in March 2014 to 24 percent (8 of 33 cases) in the September 2014 review.

DHS is addressing this concern through training and provided guides for staff and medical/mental health providers. The training began last year and

continues to be offered on a regular basis. Guides have been created and are available on the TANF staff tools website.

- **Child Safety:** Child safety reviews are required prior to each level of disqualification. The review consists of a discussion of potential risks if the TANF grant is reduced or ended. This contact may include contact with Child Welfare. If there is an open Child Welfare case, contact with the Child Welfare working is required.

The number of occurrences went up by 1, increasing the percentage from 20 percent (9 of 46 cases) in March 2014 to 30 percent (10 of 33 cases) of the cases in September 2014.

Child safety reviews are, in part, connected to the staffing prior to a full family sanction. The importance of child safety reviews is being reinforced through training. Engagement/Re-Engagement training began last year and continues to be offered on a regular basis.

- **Domestic Violence:** Domestic violence (DV) often 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 2014 review remained the same at 2 cases with a disqualification removed due to not considering domestic violence as a reason for good cause however the percentage increased from 4 percent (2 of 46 cases) to 6 percent (2 of 33 cases).

Emphasis will be placed on staff conversations with customers about the possible impact of current or past domestic violence and their ability to participate in the JOBS program. If discovered, domestic violence will need to be considered as a potential good cause reason for non-participation.

- **New DQ Instance: Local Team Staffing prior to disqualification:** Prior to a disqualification being applied, which would result in a reduction to the grant, 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 from 4 percent (2 of 46 cases) in March 2014 to 18 percent (6 of 33 cases) in the September 2014 review.

In this category, 2 of the 6 occurrences were associated with one branch. The branch had experienced a disconnection in their process, which led to cases moving to disqualification without the staffing being documented. The other 4 cases were from 4 separate branches around the state.

Training and guidance will be used to make improvements in this category. Engagement/Re-engagement training began last year and will continue to be offered on a regular basis.

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

During the September 2014 review there was an increase in occurrences to 6 percent (2 of 33 cases) of the cases. In the March 2014 review there was 1 of 46 cases, representing 2 percent of occurrences, discovered.

Unchanged from Last 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 September 2014 review continued improvements made from previous reviews. There were no cases where an assessment was needed and not provided.

- **Employment:** One of the goals of the TANF program is to help clients become employed. When a client becomes employed the disqualification would end so the family can benefit from Transitional Benefit Alternative through the SNAP program.

The percentage of occurrences in this category during the March 2014 review was 0 percent (0 of 46 cases), which remained unchanged in the September 2014 review (0 of 33 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 notice.

The percentage of occurrences in this category was 0 of 46 cases or 0 percent of occurrences in March 2014. There continued to be no occurrences in this category during the September 2014 review.

- **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 remained at 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 percentage of cases where offering screening opportunities was a reason for removing a disqualification remained at 0 occurrences.

TANF Closure due to Disqualification

There are two levels of disqualification. The first level is three months long. The second level is one month. If the individual does not begin cooperation by the end

of second level month, TANF will close and the family would not be eligible for TANF for two-consecutive months.

During the September 2014 review, approximately 70 of 659 (10 percent) cases reviewed had been closed due to disqualification. Of the 70 cases, 69 were closed correctly. This represents 99 percent of cases in this category and an increase in percentage from the previous review.

The majority of clients (69 of 70) who moved to DQR status have not had contact with the TANF program after the DQR was applied. There were 52 of 70 cases which maintained medical and SNAP benefits. A small number of cases were only receiving medical or SNAP benefits only (5 medical and 7 SNAP). Only 5 cases were no longer receiving benefits from DHS.

Conclusion

The number of cases with an active disqualification continues to increase. The number of disqualified individuals increased from 770 in September 2013 to 903 as of March 2014 and is now at 1,520. The accuracy rate had been at or above 94 percent for the past three reviews but dipped down to 89 percent in March 2014. The current review saw this rate increase by 6 percent to 95 percent.

One primary reason for the increase in accuracy can be attributed to the increase in accuracy within the DQ4 cases. DQ4 cases represent 32 percent (211 of 659 cases) of the total cases reviewed. Historically DQ4 cases had seen the lowest accuracy rate of any disqualification level. In comparison DQ1 level cases saw an accuracy rate of 98 percent but accounted for a lower percentage of total cases. This review saw the accuracy of DQ4 cases increase from 82 percent in March 2014 to 93 percent during the current review. This represents an 11 percentage point increase.

Another subset of cases, which experience a significant increase in accuracy was relating to cases with a known disability issue. There were 110 cases during the September review. The accuracy was 94 percent. The increase also represented a 12 percent increase over the prior review, which was at 82 percent.

In the past 18-months, nearly 160 additional TANF case managers were hired. Specialized training has been provided to all case managers as well as JOBS partners.

Over the past 8 months the following training sessions have been provided:

- Disabilities and accommodations and their relationship to participation and re-engagement in the JOBS program. As of November 14th, this training has reached approximately 280 TANF staff and JOBS partners.
- Engagement and Re-engagement: Rules, policy, documenting the process and proper coding of disqualified cases. As of December 10th, this training reached approximately 170 TANF staff and JOBS partners.

The addition of new case managers, have had a positive impact on DHS' ability to provide more families with needed services and attempt to engage adults in JOBS program activities. The increase in case managers along with specialized training has had a positive effect on accuracy and appropriateness of disqualifications.

As with past reviews, a question and answer document is created after the review is completed. The document will focus on a number of topics discovered during the current review. Some of these include:

- Considering disability and accommodation needs
- Considering the disability issues of other family members
- Considering past months on non-cooperation when barriers to participation are discovered.
- Documenting the re-engagement process prior to a DQ4.