

**TANF/JOBS Program
Disqualification Review – July to September 2007
And
September Opportunity**

Summary

The TANF/JOBS Program has undergone major changes over the past months. On October 1, 2007 rule and policy changes were implemented to provide consistent, appropriate, and strength based service across the state. These changes were made possible through a collaboration, which included legislators, Department of Human Services staff, citizen advocates such as legal aid, community partners and other stakeholders.

One significant change was to a process formerly called “conciliation.” For staff and clients the “conciliation” process was not seen as strength based, but rather a confusing and at times confrontational process that often did not result in the desired outcome; client participation. The desire of policy makers was to create a more streamlined, strength based, functional process to re-engage families in efforts to move them toward a more self-sufficient life. The re-designed process has been entitled “Re-engagement” to recognize the purpose of following up with clients not following their plan was to figure out why, and then adjust the plan to move forward.

The “Re-engagement” process includes:

- Making sure individual plans were created in partnership
- Ensuring that individuals are aware of their rights and responsibilities
- Ensuring that screenings and possible evaluations for barriers have been completed, and documented
- A thorough team review of the families situation before potential sanction
- Discussion of child safety issues
- Determining if an individual is willfully non-compliant or whether barriers they or their family are experiencing caused them to be unable to follow through.

The goal of these efforts, in conjunction with more effective up front processes is to identify early potential barriers to client success in the program and ensure necessary steps are taken to address those barriers.

The previous steps of disqualification consisted of three levels, which included six steps. Clients needed only indicate an intent to cooperate at the first two levels. Clients were required to participate for up to 30 days at the final level.

1. First level (DJ1 and DJ2) resulted in the loss of the cooperation incentive and a \$50 reduction in the grant.
2. Second level (DJ3 and DJ4) resulted in the loss of the cooperation incentive and the removal of the non-cooperating individual from the grant
3. Third level (DJ5 and DJ6) resulted in a full family sanction, which meant that the family would lose the monetary portion of their grant.

The new steps consist of four (4) levels. Clients are required to actively participate for two weeks to have a disqualification removed and full grant restored.

1. Level one (DQ 1) results in the loss of the cooperation incentive and the removal of the non-cooperating individual from the grant.
2. Level two (DQ 2) results in the loss of the cooperation incentive and the removal of the non-cooperating individual from the grant.
3. Level three (DQ 3) results in the loss of the cooperation incentive and the removal of the non-cooperating individual from the grant.
4. Level four (DQ 4) results in a full family sanction, which means that the family would lose the monetary portion of their grant.

As part of the transition on October 1, 2007 the department proactively reviewed all current (July to September) actively disqualified cases. In addition, clients with an active disqualification status were sent a letter inviting them in to create a new plan and have all prior sanctions removed. Following are descriptions of these efforts and the resulting outcomes.

Review of Cases With Sanctions – Summer 2007

A statewide review of all cases with active disqualifications began in July 2007. Field offices were provided lists of cases to be reviewed, which were those cases with sanctions for the months of July, August and September. Statewide the lists totaled 802 unduplicated clients.

Districts were given guidance regarding the reviews and who would conduct the reviews. Case managers were not part of the review teams but were included during the local debriefing.

Summer 2007 District review teams included:

- Line Managers
- Lead Workers
- Community Resource Coordinators
- Program Analysts
- Community Partners such as mental health providers

Reviewers were provided instructions and a review form (see attached), which was filled out and returned for each client reviewed.

Reviewers looked for specific evidence (documentation) in the case file or the computer narration system (TRACS) regarding the items below:

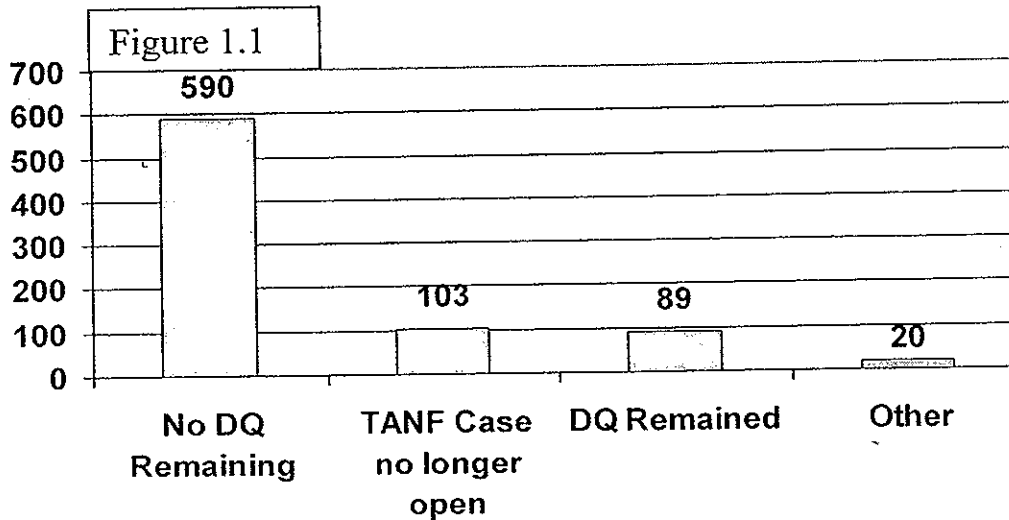
- A&D Screening (once every 12 months unless there are indicators of a potential issue). If the client was receiving A&D services, a screening for A&D was not needed.
- Mental Health Screening (once every 12 months unless there are indicators of a potential issue). If the client was currently receiving mental health services, a screening for mental health was not needed.
- Learning Needs Screening (usually one time is sufficient unless there was cause to believe that the screening was not accurate).
- A&D, Mental Health, or Learning Disability evaluation when a screening indicated that further evaluation was needed, an offer of further evaluation must be present in the documentation.
- Disability, limitation, and accommodation needs and whether they were provided.

- The presence of domestic violence issues and whether they were considered.
- Ensuring that the Client Rights and Responsibilities document (DHS 7819) was current.
- On-going Local Review Team: Required findings review team for all DJ1 – DJ4, the minimum team requirements in policy included:
 - Case manager
 - SSP line manager or SSP lead worker
 - JOBS contractor or another case manager if JOBS contractor was unavailable
 - In situations where there are known disability issues, a consultation with an appropriate professional.
- Prior to DJ5 or DJ6:
 - Attempted home visit
 - Discussion of alternate resources for the family
 - Discussion of child safety issue if the monetary portion of the grant were to end.
- Documentation of the process in TRACS.
- Process errors to included such items as:
 - Notices being sent and sent in a timely manner
 - Appropriate and current case plan
 - Client had agreed to cooperate

If specific evidence regarding any of the above was not discovered in the case file or TRACS the Summer 2007 District Review Team would determine the sanction should be removed. In these situations, if there was a missing step or steps in the process or a lack of documentation, the disqualification(s) was removed and possible under issuance provided to the family.

Results & Analysis

There were 802 unduplicated cases included as part of the review over a three month period. **Figure 1.1** below displays the status of those clients as of October 15, 2007.



- 590 – No DQ Remaining after October 1: These clients were on an open TANF grant and there were no disqualifications remaining. This represents 74 percent of client that appeared on the review lists.
- 103 – TANF Case no longer open: These clients were no longer on an open TANF grant, which represents 13 percent of those appearing on the review lists. (Case could have closed for eligibility reasons, unable to locate client, client entered employment, other).
- 89 – DQ Remained after October 1: These clients continued to have an active disqualification on an open TANF grant.
- 20 – Other: This category includes:
 - an open TANF case with an inactive disqualification, which should have been removed on October 1, 2007
 - the person disqualified was not an adult, child, or non-recipient on the case
 - the person disqualified was open on another TANF case.

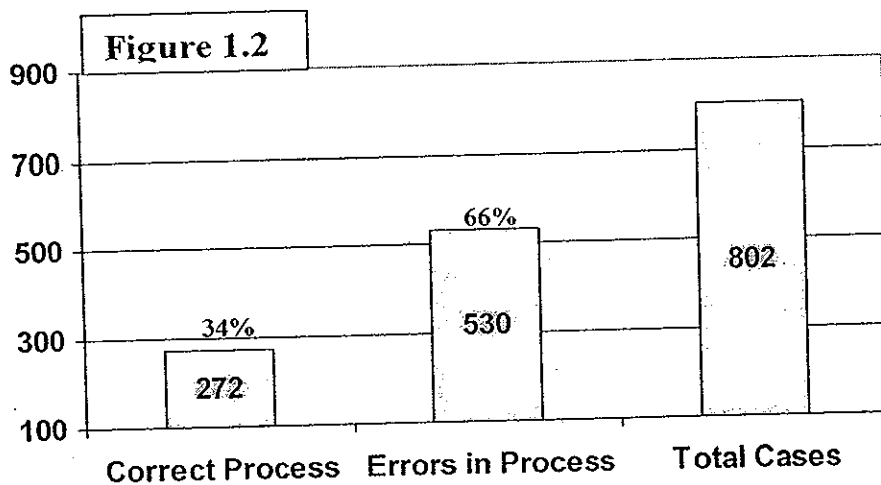
Out of 866 potential cases to be reviewed, 802 cases were reviewed. The others were not reviewed due to several reasons:

- The TANF case had been closed and the previous case worker did not remove the Need Resource coding on the Client Maintenance System (CMS).
- The client had already re-engaged and was no longer actively disqualified.
- Local staff had discovered the issue and solved the problem. This included removing the disqualification and issuing a supplement if needed.

During the review, when part or multiple parts of the disqualification process were missing the reviewer would recommend that one or more disqualifications be removed. Staff were informed that these recommendations would be final unless evidence was provided to overturn the recommendations.

In many instances the removal of one or more disqualifications resulted in an under payment or under issuance of benefits to the family. In these instances, supplements were or are in the process of being issued. As of October 25, 2007 these supplements totaled: \$126,874. An additional \$8,525 is in the process of being issued. Approximately 120 cases have supplements pending while DHS staff calculate amounts due. These supplements will be issued as soon as calculations are completed.

Figure 1.2 below displays the total number of cases reviewed, and whether the disqualification process was correct or contained errors.



- 272 of the 802 cases reviewed, had no errors. This represents 34 percent of the total cases reviewed.
- 530 of the 802 cases reviewed contained errors in the process, almost all of which resulted in one or more disqualifications being removed. This represents 66 percent of the total cases reviewed. This should not be interpreted to say all these clients should not have been sanctioned, but rather the review team did not find sufficient documentation, so the disqualifications were reversed.

Below is a listing of the most frequent occurring errors:

- No record of required screening being offered (177)
- No record of disqualification review team prior to disqualification (127)
- Process errors: this category included such issues as conciliation notices not being sent; reduction (10 day) notices not being sent, etc. (93)
- Client rights and responsibilities form not located in hard file or documented in TRACS (64)
- No record of DJ5/6 requirements met (58)
- No record of disability issues being considered (56)
- No record of required evaluation being offered (39)
- TANF closed prior to sanction (21)
- No record of domestic violence issues being considered (16)
- No record of accommodations being offered (14)
- Client employed prior to sanction (5)

Note: While the total of these errors is 670, cases sometimes had multiple errors.

There were 530 cases with errors. However, not all errors ended in the removal of a disqualification. And not all removals of a disqualification resulted in an under issuance being owed to the client. Of the 802 cases reviewed, 528 had one or more disqualifications removed. Of these 528 cases with removed disqualifications, 427 require a supplement to the family.

September Opportunity – Re-engagement Letters

The department wanted to make sure clients serving active disqualifications had every opportunity to re-engage in the JOBS program prior to implementation of the new disqualification policy on October 1, 2007.

The September One Time Opportunity (SOTO) letter was developed to encourage re-engagement in the JOBS Program for clients who remained sanctioned after reviews had been completed.

These letters were sent to clients around the state (see attached). The letter encouraged clients to contact their caseworker and explained if specific steps were taken they would have the disqualification removed.

Field offices were provided guidance on how to address:

1. Clients who did not respond to the SOTO letter.
2. Clients who received a SOTO letter but had their disqualification(s) overturned as a result of the summer review, and
3. Clients who did not receive a SOTO letter because their disqualification(s) was overturned.
4. Staff were also expected to initiate contact with client if client didn't respond to a letter.

Language was drafted to assist field offices in developing appropriate letters to send to clients (see attached). Included in the guidance:

- September Follow up to the SOTO Letter: Language to include in a letter to clients who did not respond to the SOTO letter.
- September Follow up – SOTO letter received in error: Language to include in a letter to clients who received the SOTO letter but had their disqualification(s) overturned
- September Letter – Overturned Disqualification: Language to include in a letter to clients who had their disqualification(s) removed and did not receive a SOTO letter.

Approximately 324 letters were sent to disqualified TANF/JOBS clients the first week of September. As of October 30, 2007, 117 of these clients were

no longer disqualified, had a new plan (26) or participated during the month of September (91).

Lessons Learned

The review process was conducted by field staff. Allowing local personnel to engage in this review process afforded them an opportunity to discover first hand where the process was working well and where attention would be needed.

- **Documentation:** A lot of hard work was done by case managers to provide appropriate services. Not all of that work ended up in narration; as reviewers often had to rely on narration to determine if steps in the disqualification process were followed, case sanctions were sometimes removed due to insufficient narration. Staff have learned the importance of documenting the case, to include using the computer system tools that were developed to assist in documentation.
- **Consultation:** When disability, domestic violence, and other barriers are present we must do a better job of consulting with experts such as mental health professionals, domestic violence providers, community health nurses, etc. Allowing these qualified and appropriate professionals to provide guidance and recommendations in decision making, good cause determinations, next steps, etc, in regards to the family will make for better outcomes. It is important for staff to utilize these valuable local resources.
- **Local Process:** Field staff have been provided a thorough review of their processes surrounding the disqualification process. This information will prove critical in making decisions and allocating resources to provide appropriate services to Oregon families. Staff have seen where the process is strong and where it needs attention. All districts are working to improve their processes to ensure the new requirements are met.

Next Steps – Feedback and Training

Analysts will continue to work directly with local offices in all districts to provide input and guidance to help improve their “re-engagement” process. While there were common errors around the state, there were also areas which had very strong steps in their process.

The review also provided a picture of potential training needs. Some needs are statewide in nature, while others are limited to local areas. Central office analysts and training specialists will work with Districts to determine strategies for providing appropriate levels of training for staff.

Beginning in January 2008, the third phase of staff training (relating to October 1, 2007 changes) will commence. The first two phases included statewide summits and online training opportunities coupled with staff tools. Phase three will consist primarily of bringing training to the field offices through local and region opportunities. The “re-engagement” process will be included in those training opportunities.

Monitoring and Future Reviews

Local and central office analysts will be continually monitoring the re-engagement process. Through local and state level monitoring we will be able to assess progress in moving the re-engagement process to an effective strength based and client focused process.

The TANF/JOBS Program will continue to review cases that have been disqualified. Our goal is to conduct statewide reviews every six months. Reviewers will be required to conduct a thorough review of the case and submit a completed TANF/JOBS Program – Re-engagement Review Form (DHS 7825– see attached) to program analysts in Salem.

Changes to the computerized narration system (TRACS) will help both case workers and reviewers follow the re-engagement process. TRACS has a specialized location for documenting and tracking the re-engagement process from beginning to end. This “Re-engagement Page” will provide detailed information regarding the process. It is a requirement that this page

be completed before a disqualification can be applied. Locally, managers and analysts are using the page to ensure process changes are being implemented. On a statewide level, information from that page will be transferred into a database and used to produce more detailed reporting of the re-engagement process.

District: _____ Branch: _____ Date: _____

Case Manager: _____ Reviewer: _____

Client Name: _____ Case #: _____ SSN: _____

DJ Level: _____

Situation – what led to the conciliation and DQ process?

Screenings – were these screenings offered?

Alcohol & Drug: Yes No If yes, A&D Date:
Outcome:

Mental Health: Yes No If yes, MH Date:
Outcome:

Learning Needs: Yes No If yes, LNS Date:
Outcome:

Notes: Screenings:

Assessments or Evaluations – if an assessment or evaluation was needed, was it offered?

Alcohol & Drug: Yes No If yes, A&D Date:
Outcome:

Mental Health: Yes No If yes, MH Date:
Outcome:

Learning Disability: Yes No If yes, LDA Date:
Outcome:

Notes: Assessments or Evaluations:

Disability, Limitations, and Accommodations

Were there disability issues to include, physical health, mental health, addiction, cognition, and learning disabilities identified? Yes No

If issues present, were they considered by the review team? Yes No

Were there any accommodation needs? Yes No
If yes, were they provided? Yes No If no, why?

Notes: Disability, Limitation, and Accommodations:

Domestic Violence

Were there any indications of DV? Yes No

If yes, was the DV considered by the review team? Yes No

Notes: Domestic Violence:

Other Requirements

JOBS Rights & Responsibilities JOBS R&R Date:
DQ Review Team Review Team Date:
Appropriate Review Team Members: Yes No

Notes: Other Requirements:

DJ5 – DJ6 Requirements

Child Safety Alternate Resources Attempted Home Visit

Notes: DJ5 – DJ6 Requirements:

Findings – Reviewer’s observations regarding the DQ process

Recommendations – Reviewer’s recommendations, good process; remove DJs; etc.

Branch name and returned
address entered here



Department of Human Services (DHS)
Children, Adults and Families

Client name and address
entered here

August 31, 2007

Client name entered here

During the month of September DHS is offering a special opportunity. This is for people who are disqualified. You have a chance to have your disqualifications removed. In fact, any prior disqualifications would not affect your future grant amount. On October 1, you could have a fresh start with no disqualifications.

What you will need to do is call your caseworker to set up a meeting. You can also stop by your local office. Please call or stop by before Friday, September 21, 2007 to set up a meeting.

At the meeting you will be asked to fill out a form called "My Self Assessment." You and your caseworker will work together to make a case plan using this form. At that time your disqualifications will be removed. This includes past disqualifications. On that day, your current grant will be restored as well.

This opportunity is special. It will only be there in September 2007. Call or stop by your local office as soon as you can.

We look forward to working with you as you begin your fresh start.

September Follow-up to SOTO letter

Client name entered here

You recently received a letter from DHS offering you a special opportunity during the month of September. If you take advantage of this opportunity you could have your current and prior JOBS program disqualifications removed. You are receiving this letter because we have not heard from you.

There is still time to take advantage of this opportunity. What you will need to do is call your caseworker to set up a meeting. You can also stop by your local office. Please call or stop by before Friday, September 21, 2007 to set up a meeting. However, if you stop by your local office during the last week of September we will still work with you to complete the needed forms.

At the meeting you will be asked to fill out a form called "My Self Assessment." You and your caseworker will work together to make a case plan using this form. After you complete your new plan your disqualifications will be removed. This includes past disqualifications. On that day, your current grant will be restored as well.

This opportunity is special. It will only be there in September 2007. Call or stop by your local office as soon as you can. We look forward to working with you.

September Follow-up – SOTO letter received in error

Client name entered here

You recently received a letter from DHS in error. The letter offered you a special opportunity during the month of September. Your case was recently reviewed. Your current JOBS disqualification was removed. Unfortunately, we did not have time to correct our records before we mailed you the letter.

Legislative changes to the JOBS program have provided new services. We would encourage you take advantage of the services offered by the JOBS program. There are also changes to the penalties for not participating in the program.

If you are required to participate, you may be disqualified in the future if you do not cooperate with the TANF JOBS program.

If you are not currently working with DHS on your case plan, please call your caseworker to set up a meeting. You can also stop by your local office.

When you meet with DHS you will be asked to fill out a form called "My Self Assessment." You and your caseworker will work together to make a case plan using this form.

Call or stop by your local office as soon as you can. We look forward to working with you.

September Letter – Overturned Disqualification

Client name entered here

Your case was recently reviewed. Your current JOBS disqualification was removed as part of this review.

Legislative changes to the JOBS program have created new service. We would encourage you take advantage of the services offered by the JOBS programs. There are also changes to the penalties for not participating in the program.

If you are required to participate, you may be disqualified in the future if you do not cooperate with the TANF JOBS program.

If you are not currently working with DHS on your case plan, please call your caseworker to set up a meeting. You can also stop by your local office.

When you meet with DHS you will be asked to fill out a form called "My Self Assessment." You and your caseworker will work together to make a case plan using this form.

Call or stop by your local office as soon as you can. We look forward to working with you.

**TANF/JOBS Program
 Re-Engagement Review Form**

District: _____ Branch: _____ Date: _____

Case Manager Name: _____

Reviewer Name(s): _____

Client Name: _____ Client SSN: _____

Case Number: _____ DQ or MQ Level: _____

Situation – what led to the Re-Engagement?

Screenings – were these screenings completed?

Alcohol & Drug: Yes No If yes, A & D Date:

Outcome:

Mental Health: Yes No If yes, MH Date:

Outcome:

Learning Needs: Yes No If yes, LNS Date:

Outcome:

Physical Health: Yes No If yes, PH Date:

Outcome:

Domestic Violence: Yes No If yes, DV Date:

Outcome:

If a screening was declined, did the client initial the DHS 7826? Yes No

Notes: Screenings:

Assessments or Evaluations – if needed, was it offered?

Alcohol & Drug: Yes No If yes, A & D Date:

Outcome:

Mental Health: Yes No If yes, MH Date:

Outcome:

Learning Needs: Yes No If yes, LNS Date:

Outcome:

Physical Health: Yes No If yes, PH Date:

Outcome:

If assessment or evaluation was declined, did the client initial the DHS 7826? Yes No

Notes: Assessments or Evaluations:

Disability, Limitations, and Accommodations

Were there disability issues to include, physical health, mental health, addiction, cognition and learning disabilities identified? Yes No

If issues present, were they considered by the review team? Yes No

Were there any accommodation needs? Yes No

If yes, were they provided? Yes No If no, why?

Notes: Disability, Limitation, and Accommodations:

Domestic Violence (DV)

Were there any indications of DV? Yes No

If yes, was the DV considered by the review team? Yes No

Notes: Domestic Violence:

Additional Requirements

Child Safety (At each level of Re-Engagement): Yes No

Alternate Resource (Required prior to DQ 4): Yes No

Attempted Home Visit (Required prior to DQ4): Yes No

JOBS Rights & Responsibilities (Current): Yes No

R & R Date:

DQ Review Team Review Team Date:

Appropriate Review Team Members: Yes No

Notes: Additional Requirements:

Finding – Reviewer’s observations regarding the Re-Engagement process

Recommendations – Reviewer’s recommendations, good process; remove DQs; etc.

[Click here for submitting instructions](#)

Submitting Instructions

Option #1:

- Prior to clicking the **Submit Request** button on the form, write down or copy email address listed below, save document to your desk top, close the browser and open document in MSWord application.
- Click the **Submit Request** button
- Completed forms will automatically attach to the email
- Fill in the **To section** of the email with the email address below
- You may want to include a copy of the email to yourself for your records
- Send email

Submit Request

Option #2: (Use this option if unable to use option #1)

- Save document to your desk top and close the browser.
- Open Groupwise or other email system
- Attach form to email
- You may want to include a copy of the email to yourself for your records
- Send to address below

Choose Email Address to Use

Groupwise Users

Policy, TANF

Users Outside of Groupwise

TANF.Policy@state.or.us

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