



Department of Human Resources
311 West Saratoga Street
Baltimore MD 21201

FIA ACTION TRANSMITTAL

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**TO: DIRECTORS, LOCAL DEPARTMENTS OF SOCIAL SERVICES
DEPUTY/ASSISTANT DIRECTORS FOR FAMILY INVESTMENT
FAMILY INVESTMENT SUPERVISORS AND ELIGIBILITY STAFF
LOCAL HEALTH DEPARTMENTS**

FROM: CHARLES E. HENRY, EXECUTIVE DIRECTOR, FIA

JOSEPH DAVIS, EXECUTIVE DIRECTOR, OOE, DHMH

**RE: PRIMARY PREVENTION INITIATIVE (PPI)
PRESCHOOL HEALTH AND SCHOOL DISALLOWANCES**

PROGRAM AFFECTED: TEMPORARY CASH ASSISTANCE

ORIGINATING OFFICE: OFFICE OF POLICY, RESEARCH AND SYSTEMS

SUMMARY:

The Family Investment Administration (FIA) has received information from the advocate community concerning customers who were unable to access health care to meet the PPI requirement that children under age 7 have an annual checkup. The local health departments have notified FIA that they will provide outreach to customers whose children have preschool health disallowances or have difficulty accessing health care.

In July 1992, local departments were notified of changes to Maryland's welfare reform by implementing the Primary Prevention Initiative (PPI) for Aid to Families with Dependent Children (AFDC). Two PPI components were the requirement for preschool children under the age of seven to have an annual health check up and children seven and older be enrolled and attending school 80 per cent of the time. A \$25 disallowance was imposed for each child not meeting the preschool health and school requirements.

In January 1997, with the implementation of the Temporary Cash Assistance (TCA) program (replacing AFDC), preschool health and school requirements continued. A \$25 disallowance imposed for each child not meeting the requirements also continued.

Action Transmittal #97-52 notified local departments of the preschool health and school requirements and the disallowances under TCA.

A recent CARES inquiry indicated that there are 1514 preschool health disallowances

and 2362 school disallowances for a total of 3880 disallowances imposed in TCA cases statewide. Because there is concern about the number of disallowances, more detailed reports were requested. A copy of these reports will be distributed under separate cover to each local department Director and Assistant/Deputy director.

ACTION REQUIRED:

A. PRESCHOOL HEALTH (PSH) REQUIREMENTS, GOOD CAUSE, DISALLOWANCES, AND LOCAL HEALTH DEPARTMENTS

1. Requirements
 - a. At application caretaker relatives are no longer required to declare that TCA children under the age of 7 have had an annual health check up.
 - b. Caretaker relatives must verify once every calendar year that TCA children under the age of 7 have had an annual health check up. There is no requirement for up-to-date immunizations.
2. Imposing Disallowances – Children who do not have verification of an annual check up without good cause have a \$25 disallowance imposed until they do.
3. Good cause includes families working with the Child Protective Services (CPS), Families NOW or Intensive Family Services (IFS) programs.
4. Recently, information was received concerning customers who are unable to access health care to meet the annual check up requirement. There may be times when a customer cannot get a doctor’s appointment for several months.
 - a. Do not impose a \$25 disallowance when a customer is unable to access health care. The case manager must ask about the customer’s circumstances. Determine if the customer made an attempt to get a health checkup for their TCA pre-school children.
 - b. If the customer made an appointment with the health care provider:
 - √ Document clearly in the narrative that the customer has a future appointment (date, time and provider’s name),
 - √ Set a 745 alert to follow up in the appointment month.
 - √ Notify the customer that verification of the check up for the child is needed. If the customer fails to provide the verification, impose a disallowance.
5. Local Health Departments
 - a. Local health departments in each jurisdiction have notified FIA that they will

provide outreach to customers whose children have preschool health disallowances or have difficulty accessing health care.

- b. Local departments can provide their local health departments with the information needed to contact their TCA customers. This information includes, but is not limited to, the caretaker relative name, address, the name and birth date of the child with the disallowance and the child's provider's name.
- c. Local departments are responsible for contacting the Administrative Care Coordination Unit (ACCU) Coordinator at the local health department in their jurisdictions and establishing referral procedures for families with preschool health disallowances or families who have not been able to access their health care provider to meet the PPI requirement.
- d. A **listing of the ACCU Coordinators** for each jurisdiction is attached.

B. SCHOOL REQUIREMENTS, GOOD CAUSE, DISALLOWANCES, AND INTERVENTION

1. Requirements – For all TCA children (excluding minor parents):

a. At application:

- √ Caretaker relatives are not required to declare that children age 7 through 15 are enrolled and attending school at least 80 percent of the time.
- √ Children age 16 and older must have verification of enrollment in school or an alternative course of study that will lead to a diploma or GED and are attending 80 percent of the time, or be a high school graduate.
- √ If the application is during the summer months and enrollment cannot be verified, set a 745 to follow up on enrollment and attendance in October.

b. At recertification:

- √ Children age 7 and older are required to be enrolled in school and attending at least 80 percent of the time unless there is good cause.
- √ Children age 16 and older who are not enrolled in school or an alternative course that leads to a diploma or GED, or are high school graduates must be in a work activity. If not enrolled, the child is not eligible for TCA.
- √ Local departments must have work activities/programs in place for 16 and 17 year-old TCA children who are not enrolled in school or who are high school graduates.
- √ Children who are 18 and not in school are not eligible for TCA.

- √ If the recertification is during the summer months and current enrollment and attendance cannot be verified, use the most recent verified attendance for the month in the last available school quarter. Set a 745 to follow up on enrollment and attendance in October.
2. Minor parents (with a child 12 or more weeks old) who included as children in the TCA assistance unit:
- a. Must be enrolled and:
 - √ Attending school at least 80 percent of the time **or**
 - √ Participating at least 80 percent of the time in an alternative education or training program approved by the state **or**
 - √ A high school graduate.
 - b. If the minor parent does not meet any of the requirements listed in "a" above, the minor parent's needs are removed from the TCA grant. Follow the conciliation and sanction procedures in AT #02-47.
3. Good cause includes:
- a. Cooperating with a service agreement for Child Protective Services, Intensive Family Services or Families Now,
 - b. Verification of an acute or chronic medical condition or learning disability,
 - c. Verification of the observance of religious holidays; or
 - d. Verification of the death of an immediate family member.
 - √ Allow a maximum of 3 days
 - √ "Immediate family member" is defined as a parent, grandparent, child, sibling, or caretaker relative
 - √ Verify the death with an obituary notice, death certificate, funeral program, or other similar documentation
4. Imposing Disallowances
- a. If a 7 through 15 year-old child does not meet the 80 percent attendance requirement without good cause, impose a disallowance.

- b. If a 16 or 17 year old child is not meeting the 80 percent attendance requirement without good cause, impose a disallowance.
- c. For any school age child, the case manager should talk with the caretaker relative to determine:
 - √ Why the child is not enrolled in school **or**
 - √ Not meeting the 80 percent attendance requirement, **and**
 - √ If the family is not participating in services to resolve the enrollment and/or attendance issue, the family should be referred to an intervention program.
- d. If a 16 or 17 year old child is not enrolled full time in school or pursuing a diploma or GED or is a high school graduate, refer the child to a work activity.
- c. If the 16 or 17 year child does not cooperate with the work activity without good cause, impose an individual sanction and remove the needs of the child from the TCA grant. Follow the conciliation and sanction procedures outlined in AT #02-47.

5. Intervention

- a. There may be help from other departments within DHR, other State Departments or agencies in local jurisdictions to provide assistance in enrolling a child and/or increasing a child's attendance.
- b. Local departments may have intervention services already in place to serve the customers in their jurisdictions.
- c. Local departments who do not have intervention services in place to meet the needs of these families must explore all available departments within DHR, the Department of Education, other state departments and community agencies in order to establish intervention services for their TCA families with school disallowances who are not actively working with an intervention service.

ACTION DUE:

This is ongoing policy.

NARRATE ALL CASE ACTIVITY CAREFULLY:

Local departments must ensure that narration of case activity is clear, concise, and complete according to the action taken by the case manager. Good narration also

supports the local department decision in the event of a fair hearing or selection of the case for Quality Control review.

FREE-FORM TEXT ON NOTICES:

Case managers must add plain English, case specific free-form text to the appropriate CARES notice so that the customer is able to read and understand the reason for the sanction or closing.

RIGHT TO APPEAL

As a reminder, local departments shall advise households of their right to appeal a local department decision and the procedures for requesting a fair hearing. Local departments must also advise households of any legal services that might be available to represent them during a fair hearing. To find out the number of their local Legal Aid office, customers may call Legal Aid's toll-free number, 1.800.999.8904.

INQUIRIES

Please direct questions to Edna McAbier at 410.767.8805 or email at emcabier@dhr.state.md.us.

- c: FIA Management Staff
- DHMH Management Staff
- Constituent Services
- DHR Help Desk
- RESI