

DEPARTMENT OF HUMAN SERVICES FAMILY INVESTMENT ADMINISTRATION		TEMPORARY CASH ASSISTANCE MANUAL
PRIMARY PREVENTION INITIATIVE 314	COMAR 07.03.03.07	TECHNICAL ELIGIBILITY 300

### 314.1 REQUIREMENTS

- A. The Family Investment case manager explains the Primary Prevention Initiative (PPI) requirements to each family applying for TCA
- B. Each calendar year, each child between birth and age 6 must receive preventive health care according to the Early and Periodic Screening, Diagnosis and Treatment (EPSDT) schedule, or as advised by the child's doctor.
  1. Health care consists of at least one medical check-up within the year
    - The health care provider gives inoculations as appropriate.
  2. Impose a \$25 disallowance per month to the grant for each child who, without good cause, has not received the medical check-up.
    - Keep the disallowance in effect until the family provides proof that the child has had a check-up.
    - Send 10-day adverse action prior to imposing the disallowance.
- C. Each child age 7 or older (in the calendar year) must attend school at least 80% of the time or be a high school graduate
  1. The 80% attendance may be met in one of the two-time frames:
    - The most recent school quarter.
    - The most recent school calendar month.
  2. Impose a \$25 disallowance per month after 10 days adverse action to the grant for each child who does not meet 80% attendance and does not have good cause, EXCEPT THAT
    - If the child is a minor custodial parent with a child at least 12 weeks old deduct the incremental portion of the maximum allowable amount (see Example 3).
    - The minor parent may attend education leading to a diploma or an alternative educational program or training program approved by the State.
  3. Keep the disallowance in effect until the child meets the requirement.
  4. PPI disallowances count as phantom income for the Supplemental Nutrition Assistance Program (SNAP). CARES will automatically count the full TCA grant including the amount for any PPI disallowance on the case. **Do not enter the PPI disallowance on the UINC screen.**

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### **314.2 AT APPLICATION**

- A. 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.
- B. 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.
- C. If the application is during the summer months and enrollment cannot be verified, set a 745 alert to follow up on enrollment and attendance in October.

### **314.3 AT RECERTIFICATION**

- A. 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.
- B. 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.
- C. 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.
- D. Children who are 18 and not in school are not eligible for TCA.
- E. 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 alert to follow up on enrollment and attendance in October.

### **314.4 MINOR PARENTS (WITH A CHILD 12 OR MORE WEEKS OLD) WHO ARE INCLUDED AS CHILDREN IN THE TCA ASSISTANCE UNIT**

- A. Must be enrolled and:
  - 1. Attending school at least 80 percent of the time, **or**
  - 2. Participating at least 80 percent of the time in an alternative education or training program approved by the state, **or**

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3. 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 conciliation and sanction procedures. (Additional information on minor parents is found in Technical Eligibility, section 308, Minor Parents.)

### **314.5 GOOD CAUSE**

A. Do not impose a disallowance if there is good cause.

B. Allow good cause for failure to meet the health care requirement only when the customer is cooperating with an existing agreement with one of the following programs:

1. Child Protective Services
2. Intensive Family Services
3. Families Now

C. Allow good cause for failure to meet the education requirement only when the customer:

1. Is cooperating with an existing service agreement with Child Protective Services, Intensive Family Services, or Families Now.
2. Provides proof of an acute or chronic medical condition of the child.
  - Minor parents may claim good cause for failure to meet the attendance requirement because of her own medical condition or their child's medical condition.
3. Provides verification of the death of an immediate family member.
  - Allow a maximum of 3 days.
  - Define immediate family member as a parent, grandparent, child, sibling, or the caretaker relative of the child.
4. Provides verification of the observance of religious holidays, or
5. Is a minor parent with a child less than 12 weeks old.

D. Allow good cause, using the criteria in C. above, only if a minor parent is not meeting 80% attendance requirement.

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- There is no good cause if the minor parent is not enrolled in school, an alternative education program, or training program approved by the State.

### **314.6 ADDITIONAL BENEFITS-HEALTHCARE**

Authorize a \$20 health bonus once per calendar year for each person in the assistance unit who meets all of the following criteria:

- Is age 7 or older (in the calendar year)
- Received a preventive health care check-up within the calendar year, and
- Provides proof of the health check-up

### **314.7 VERIFICATION – HEALTHCARE**

- Require verification of preventive health care once per year for:
  - Children age 6 or younger (in the calendar year) to avoid a disallowance.
  - Adults and children age 7 and above (in the calendar year) to receive the \$20 annual bonus.
- Acceptable verification includes:
  - Primary Prevention Health Care Form (DHS/FIA/PPI 1131)**
  - Statements or other forms from health providers which give the date of the last check-up, a valid provider signature, and telephone number.
  - Documented telephone calls with the health provider.
    - Record the date, name, and title of the person contacted, and the specific information verified.

**Note:** Immunization cards are not acceptable because they do not prove receipt of a health check-up.

### **314.8 VERIFICATION – SCHOOL ATTENDANCE**

- Require verification of 80% attendance once per school year.
- Acceptable verification includes:
  - School Verification Form (DHS/FIA/PPI/604A)**

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2. School match tapes, microfiche, or other local department/school automated interfaces
  3. Report cards
  4. Statements from the teacher or administrator on school letterhead paper
  5. Documented telephone calls
    - Record the date, name, and title of the person contacted, and the specific information verified
  6. Diploma.
- C. Verify home schooling with the local Board of Education in the jurisdiction where the family lives
1. Attendance and enrollment requirements are satisfied if the child is in homeschooling approved by the Maryland State Department of Education (MSDE).
  2. The customer shall provide the attendance records required by MSDE.

### **314.9 VERIFICATION – GOOD CAUSE- SCHOOL**

- A. Acceptable verification of good cause includes:
1. Cooperation with a service agreement – local procedures for communicating with Social Services
  2. Acute or Chronic medical condition – doctor's statement or other medical records
  3. Religious holidays – statement from clergy that specifies the days
  4. Family Death – Obituary notice, death certificate, funeral program, or other similar documents. Relationship to the deceased is needed only if questionable (Allow a maximum of 3 days)
  5. Age of minor's child – baby's birth certificate or MMIS, or
  6. Documented telephone calls which prove good cause
    - Record the date, name, and title of the person contacted, and the specific information verified

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B. Verify good cause at each redetermination.

### **314.10 GOOD CAUSE- ATTENDANCE CALCULATION**

A. Calculate 80% attendance for the child who has been granted good cause due to a death in the family or religious holidays by:

1. Subtracting the days approved for good cause from the total days absent
2. Dividing the new number for days absent by the total number of school days

B. Good cause exists when the percentage calculated in A above is 20% or less

### **314.11 CURING A DISALLOWANCE**

A. Remove the disallowance when one of the following occurs:

1. The customer provides proof that the requirement has been met.
  - a. The health care requirement is met when the customer provides proof that the child received a medical check-up.
  - b. The 80% attendance requirement is met when the child has attended 80% of the time for the most recent calendar month or the most recent quarter.
2. Good cause is established.
3. The child leaves the assistance unit (home).

B. Remove the disallowance the month after verification is received.

C. Delete the phantom income from the food stamp case.

1. The referral to a work activity does not eliminate the penalty which was already in place under PPI; enrollment is required.
2. Initiate the 30-day conciliation period if not already used.
3. Explore deficit budgeting when disallowances are imposed.

**Note:** If there is no PPI penalty in place at the time of the referral, only impose a work sanction if the minor parent fails or refuses to participate.

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Reduce monthly benefits by \$25 per child when customers fail to meet or provide proof of adherence to these requirements without good cause

### **314.12 DISALLOWANCE**

- A. Impose the \$25 per child monthly disallowance until good cause is established, the requirements are met or the requirements no longer apply to that child
- B. Verify annually that children
  - 1. Between birth through age 6 had a medical check-up.
  - 2. Ages 7 to 17 are enrolled in school and attending at least 80% of the time.

**Note:** Age is based on the calendar year in which the child attains the specified age. An 18-19 year-old who is not enrolled in school or attending 80 % of the time is not eligible for TCA.

- C. Reduce monthly benefits by \$25 per child when customers fail to meet or provide proof of adherence to these requirements without good cause.

### **314.13 CASE MANAGEMENT TIPS**

- A. A child age 16 and 17 who is not a minor parent and who is not enrolled in school, is subject to work requirements; continue the PPI disallowance until the work activity referral is made.
  - 1. Unless the child refuses to participate in work activities, remove the disallowance effective the month after the work activity referral.
  - 2. If the child refuses to participate, impose the appropriate work sanction, and remove the disallowance.
  - 3. Initiate the 30-day conciliation period if it has not already been used.
- B. Minor parents, age 16 and 17, who are not enrolled in school are also subject to the work requirements.
  - 1. The minor parent must be enrolled in school or an alternative education or training program in order to have his or her needs included in the grant.
  - 2. Continue to deduct the incremental portion of the grant until the minor parent is enrolled in school or another education or training program which is also the required work activity.

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### 314. 14 EXAMPLES

Example 1. Ms. Johnson received TCA for herself, her son Mark - age 10, and her daughters Sally – age 5, and Jenny – age 3. Mark is in the 4<sup>th</sup> grade and has been absent about 40% of the time during the last quarter and the most recent month. Ms. Johnson states that Mark always has a cold or doesn't feel well, but the doctor did not find anything wrong when Mark had his check-up. Sally has all her inoculations but has not been to the doctor for about 18 months. Jenny had a check-up last week but is behind on her inoculations. Ms. Johnson and Mark have proof of health check-ups within the calendar year. Ms. Johnson does not have a service case.

- Impose a \$25 disallowance for Mark because he does not meet the attendance requirement and does not have proof of an acute or chronic condition
- Impose a \$25 disallowance for Sally because she has not had a health check-up within the last year, even though she has had all her inoculations
- Do not impose a disallowance for Jenny because she meets the criteria with an annual check-up. There is no penalty for not being up to date on inoculations
- Authorize the \$20 annual health allowance for Ms. Johnson and Mark (\$40 total) because they received health check-ups in the calendar year
- Check for a deficit budget and follow up if needed

Example 2. Ms. Smith receives assistance for herself and her sons, Jim – age 12 and John - age 10. Disallowances were imposed for Jim and John because they were not going to school 80% of the time and there was no good cause. Ms. Smith returned to the local department on May 2 with a statement from John's teacher that he had perfect attendance in April. The statement from Jim's teacher stated that he was there every day, but was late on 15 occasions.

- Remove John's disallowance effective June because he met the attendance requirement for a calendar month.
- Remove Jim's disallowance effective June. He met the 80% requirement and there is no penalty for lateness.

Example 3. Mr. Jones receives assistance for 5 persons, himself and his children, Jane – age 16, Beth – age 15, Ann – age 12, and Beth's son, Brian age 14 months. Jane has dropped out of school. Beth has only 70%

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attendance and no good cause. Ann is attending 90% of the time. Brian had his check-up and inoculations.

- Refer Jane to a work program activity. Impose a work sanction (not a disallowance) if she does not comply with work activities
- Reduce the grant by the incremental portion of the TCA grant for Beth because she did not meet the 80% attendance and she is a minor mother. The incremental portion is the difference between the allowable payment for a 4 and a 5 person household.
- Check for deficit budget and follow up if needed

Example 4. Ms. Winters has 2-year-old twins, Michael and Matthew. Ms. Winters has severe asthma and is unable to work, but can care for her children. Neither child has been to the doctor in the last year because both have been well and both had all their shots. There is no social service case.

- Impose a disallowance for the twins (\$50 total) because a chronic or acute medical condition is not good cause for failure to meet the health care requirements. Tell Ms. Winters how she can remove the disallowance by taking the twins to the doctor and bringing proof.
- Check for deficit budget and follow up if needed

Example 5. Ms. Summers receives assistance for herself and her son Sam. Sam, who is in the 4<sup>th</sup> grade, has missed school because of illness. He missed 20 out of 60 days in the last quarter and was absent 33% of the time. Ms. Summers had a statement from Sam's doctor verifying that Sam was hospitalized for 6 school days and recuperated at home for an additional 5 school days.

- Subtract the 11 days missed that are excused for good cause from the days missed
  - 20 days – 11 days = 9 days absent without good cause
- Divide the days absent without good cause by the total days in the quarter
  - 9 days / 60 days = 12% absent
- Do not impose a disallowance because Sam's excess absences were excused for good cause

Example 6: Matilda Martin receives TCA for herself, her son Steve – age 10, daughter Belinda – age 17, daughter Suzanne – age 16, Belinda's son Brandon –

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age 2 and Suzanne's daughter Holly – age 15 months. All the children meet the PPI requirements, except Suzanne. She dropped out of school last week on her 16<sup>th</sup> birthday because it had always been very hard for her and she did very poorly. However before she dropped out, she maintained the 80% attendance requirement.

- Refer Suzanne for enrollment in an education or training program through the work program
- Create a **745 Alert** to follow-up on enrollment
- Do not impose a sanction unless Suzanne fails or refuses to participate.

**Note:** If Suzanne was not meeting the 80% attendance she dropped out of school, and her needs were removed before her birthday, keep the reduced grant in effect until she is enrolled in an educational or training program through the work program.