

Supporting Youth Through the Pandemic Webinar
April 6, 2021
Q & A Document

Q1. Is the \$4,000 cap just on purchasing a vehicle or for total transportation assistance?

A. The \$4000 cap is on all transportation expenses per youth or young adult.

Q2. What are the dates on the transportation provisions?

A. April 1, 2020 through September 30, 2022

Q3. Do the youth have to be working to assist with the vehicle purchase? Or any other type of requirements to assist with this?

A. There is no work requirement to assist a youth or young adult with a vehicle purchase when using Chafee funding.

Q4. Is the cap for "transportation costs \$4K total per child?

A. Yes, per year.

Q5. For the transportation assistance - would this also apply to purchasing Gift Cards for Uber to help get them back and forth to school / work etc.?

A. Uber gift cards not allowable. However, PCSA's can look at opening an Uber business account and offer transportation assistance through the app. Updated.

Q6. You previously mentioned that this program will assist with costs associated with vehicle insurance, purchasing an automobile, and other costs associated with this but now I'm hearing that it does not? Please clarify...

A. Costs may be related to obtaining a driver's license, vehicle insurance, driver's education classes and testing fees, practice lessons, practice hours, license fees, roadside assistance, deductible assistance, and assistance in purchasing an automobile.

Q7. Does the youth have to be working or going to school to assist the youth in purchasing a vehicle?

A. There is no work requirement to assist a youth or young adult with a vehicle purchase when using Chafee funding.

Q8. Do the youth have to be working to assist with the vehicle purchase? Or any other type of requirements to assist with this?

A. There is no work requirement to assist a youth or young adult with a vehicle purchase when using Chafee funding.

Q9. What about the purchase of a car for TANIF IL use before Chafee

A. Agencies must exhaust Chafee funding first. If using TANF IL funding for vehicle purchase, the youth or young adult should be employed.

Q10. If youth wish to leave foster care when they reach 18/ graduate from high school, are agencies able to proceed to end foster care/ custody?

A. The Consolidated Appropriation Act's intent is for PCSAs to delay emancipation so that agencies may provide added supports during the global pandemic to ensure young adults have a stable final transition plan. The final decision rest with the court and should take agency recommendations into consideration in addition to the young adults wishes. We encourage PCSAs to work with young adults to make the most of the opportunity to delay emancipation by offering incentives, direct financial assistance and other appropriate supports.

Q11. What does the extension of foster care do to you count for achieving permanency/reunification on CPOE Review versus children emancipating out of care when children are not in the agency permanent custody?

A. If a case is reviewed, the entire time a youth is in care during the period under review (regardless of the case plan goal) will be assessed. While the current federal review tool utilized does give suggested timeframes to achieve permanency, it also allows for flexibility in cases where there are justifiable reasons for delays. In cases where the decision has been made to extend a youth's time in care, the technical assistance would be to ensure that the reason for the extension is clearly documented in the case record, along with all case activities that are taking place during this extended period of time to support the youth as they prepare to exit custody.

Q12. How can the Agency legally maintain a child in custody in light of jurisdictional restrictions under ORC 2151.353(F)(1)?

A. Pursuant to A1 under ACYF-CB-PI-21-04, The Supporting Foster Youth and Families through the Pandemic Act establishes new temporary requirements that all title IV-E agencies must carry out to prevent youth from aging out of foster care and to facilitate re-entry into foster care. These requirements apply whether or not a title IV-E agency currently is approved to provide eligible youth age 18 or older title IV-E foster care maintenance payments under section 475(8)(B) of the Act and regardless of the current maximum age for foster care under the laws and policies of the state or tribe.

Q13. By statute if a youth is 18 and graduated, they must Emancipate. So, does this supersede that and they can stay in care even if they have graduated?

A. Yes. Pursuant to A1 under ACYF-CB-PI-21-04, The Supporting Foster Youth and Families through the Pandemic Act establishes new temporary requirements that all title IV-E agencies must carry out to prevent youth from aging out of foster care and to facilitate re-entry into foster care. Specifically, the Title IV-E agency may not require a youth to leave foster care solely due to age through September 30, 2021 (section 4(a) of Division X).

Q14. How were local juvenile courts made aware of the changes to a young person remaining in care after the age of 18?

A. ODJFS has worked with the Supreme Court of Ohio to increase the Courts' knowledge about the provisions of the Act. Title IV-E Agencies are encouraged to meet with their local courts of jurisdiction prior to any court hearings to review the new temporary federal mandates for extending care to young adults in their custody.

Q15. PPGD 5 states “provide outreach and offer any needed assistance to youth who experienced FC after attaining age 14 and were subsequently reunified.” Does this “assistance” refer to the same potential expenses (housing, groceries, utilities, respite, transportation, etc.) as youth currently in care? What if the youth left foster care to custody of a relative?

A. While the PPGD 5 provided a general overview the Act’s provisions for youth and young adults, Ohio’s Chafee programs provide such assistance solely to those who have emancipated from care in order to ensure that available resources are targeted to those who are most at-risk and vulnerable. In accordance with the Act and Ohio’s program requirements, Post-Emancipation Services and Supports must be provided to young adults through age 26 until September 30, 2021.

Q16. Can these funds be used for children who do not emancipate due to age but would not have emancipated as they would have already stayed in FC due to being reasonably expected to graduate by the time the child turned 19?

A. Only if they are non-title IVE eligible.

Q17. If a child has chosen to stay in agency custody but will not graduate prior to their 19th birthday, therefore making them non-IV-E eligible, can we charge their placement cost to this Chafee funding?

A. Yes

Q18. Do they have to turn 18 after the 12/27/2020 date in order for them to qualify to use this funding if non-IV-E eligible?

A. No, but the PCSA can only claim costs associated with non-title IVE eligible young adults that have turned age 18 between the dates of 12/27/2020 and 9/30/2021.

Q19. Can these funds be used for children who do not emancipate due to age but would not have emancipated as they would have already stayed in FC due to being reasonably expected to graduate by the time the child turned 18?

A. Yes

Q20. Can child's placement Admin. cost along with maintenance cost paid to child's placement for non-IVE child be charged to the funding?

A. After further review of the federal Program Instruction, we believe the maintenance and administration costs would be allowable. Updated.

Q21. Where in the regs does it indicate that for county admin for these new funds that it can only be claimed for non-eligible kids?

A. The regulations state the funds may be used for non-eligible youth. It does not state only for non-eligible youth. Admin costs for Chafee services may be claimed regardless of eligibility.

Q22. Can child's placement Admin. cost along with maintenance cost paid to child's placement for non-IVE child be charged to the funding?

A. Yes. Updated.

Q23. If we use current RMS Chaffe codes but have already spent those dollars, can we recode the costs associated with the current code to the new code/funding?

A. A Chafee Stimulus RMS code will not be available until the 2021Q3 RMS sample, which allocates the Jul-Sept 2021 quarter. Therefore, two new PCSA project codes are available in CFIS to assist in recoding 760-774 RMS expenditures from Federal Chafee (Regular Chafee) to Chafee Stimulus.

JFSFP879 – Project code to move RMS 760-774 expenditures from Federal Chafee

JFSFP724 – Project code to move expenditures to Chafee Stimulus

1. It is optional to recode Federal Chafee RMS expenditures to Chafee Stimulus, it is not required.

2. Agencies will use the CFIS CR454A report to identify the 760-774 RMS expenditures that allocated to Federal Chafee and recode as follows:

a. JFSFP879-501001 – CR454A amount input as a negative amount

b. JFSFP724-501001 – CR454A amount input as a positive amount

3 RMS 760-774 RMS expenditures incurred from October 2020 through June 2021 can be recoded to Chafee Stimulus.

4. The new Chafee Stimulus RMS project and activity codes will be communicated by the CFIS Help Desk by June 1, 2021.

Q24. But you can't re-code any non iv-e eligible youth correct? Just those non iv-e eligible youth that did not emancipate at 18?

A. The RMS definition allows for non IV-E eligible youth. See answer to #23.

Q25. How far back can we go back and recode RMS expenditures?

A. October 1, 2020.

Q26. To reclass Chafee RMS 774 code would we go back thru observations and if the observation was for a youth that was not 4e eligible then would we reclass that hit - but now that those quarters are closed - how would we transfer the cost?

A. See answer 23 and this adjustment can be made in any open quarter during FFY21.

Q27. What RMS codes should I use in April and May before an RMS is available in June?

A. Agencies can use 760-774 and then recode to Chafee Stimulus using the information in questions #23.

Q28. I thought you were not allowed to use IL monies to purchase gift cards.

A. You are correct.

Q29. Was that a "yes" on uber gift cards for transportation assistance?

A. Uber gift cards not allowable. However, PCSA's can look at opening an Uber business account and offer transportation assistance through the app. Updated.

Q30. Uber gift cards or does it have to be an account to be eligible.

A. Uber gift cards not allowable. However, PCSA's can look at opening an Uber business account and offer transportation assistance through the app. Updated.

Q31. Can we use dollars to pay a childcare co-pay? A copay for the child of the youth?

A. Yes.

Q32. Also wanted to confirm that the stimulus funding is 100% reimbursable.

A. Yes.

Q33. Do the new Chafee Stimulus funds have a match requirement or is this also waived?

A. Chafee Stimulus is funded at 100% FFP, there are no matching requirements.

Q34. Do we need to expend these funds before spending the remaining TANF IL funds for this fiscal year?

A. Yes.

Q35. How does this impact our TANIF IL funds since we have to expend Chafee before we can use?

A. ODJFS is reviewing potential ways to adjust future allocations so that PCSAs are not penalized for underspending TANF IL funds for SFY21. Additional communication forthcoming.

Q36. Please confirm if we have to spend regular Federal Chafee before utilizing Chafee Stimulus.

A. The stimulus funds are intended to supplement the already existing Chafee funds and especially as a means to support youth aging out during the pandemic. Agencies will need to be strategic in their use of the funds and be cognizant of this when using traditional Chafee so funds aren't lapsed. The stimulus funds are available through 9/30/2022, however the additional flexibilities being provided in the Stimulus Act will end on 9/30/2021.

Q37. Will there be a post allocated adjustment to move a ceiling excess from regular Chafee to the stimulus allocation?

A. Currently there is not a PAA from Federal Chafee to Chafee Stimulus.

Q38. The Chafee is much anticipated for supporting our clients. However, its more money than we typically have in an entire year. Therefore, any remaining TANF-IL remaining will more than likely go unspent and will impact future TANF-IL because of the underspent funds. Is there any way this can be reviewed and adjusted based on this change?

A. ODJFS is reviewing potential ways to adjust future allocations so that PCSAs are not penalized for underspending TANF IL funds for SFY21. Additional communication forthcoming.

Q39. What federal PA are you referencing?

A The federal PI is ACYF-CB-PI-21-04

Q40. Are we able to recode TANF IL expenditures?

A. If the expenditures occurred during FFY21 and they are allowable to the Chafee Stimulus, then yes.

Q41: Does the temporary suspension of eligibility criteria also mean that youth with challenges to employment/training (ie. developmentally delayed) will be eligible for Bridges program?

A: To meet eligibility for Bridges, pursuant to OAC 5101:2-50-02, all the following must be met:

1. Upon attaining age 18, the young adult was in the custody of an Ohio PCSA, a Title IV-E Juvenile Court, or in the care and placement of DYS while in an IV-E reimbursable placement setting.
2. The young adult has left this custody.
3. The young adult has reached at 18 but not yet 21.
4. The young adult meets at least 1 of the 5 eligibility criteria:
 - (a) Completing a secondary education or a program leading to an equivalent credential.
 - (b) Enrolled in an institution that provides post-secondary or vocational education.
 - (c) Participating in a program or activity designed to promote, or remove barriers to, employment.
 - (d) Employed for at least eighty hours per month.
 - (e) Incapable of doing any of the activities as described above due to a diagnosed physical or mental health condition.

A young adult unable to meet the education, employment, or program criteria due to being developmentally delayed would meet the medical criteria for eligibility.

The Supporting Foster Youth and Families through the Pandemic Act (H.R. 7947) allowed for temporary changes to Bridges eligibility most notably allowing a young adult to remain in Bridges past age 21 in addition to suspending the need to meet at least 1 of the 5 eligibility criteria outlined above.

Q42: Then why have DD youth been denied services in the past?

A: Developmentally disabled young adults are eligible for Bridges if they meet the eligibility criteria as defined in OAC 5101:2-50-02. If there are concerns of a young adult being denied the ability to apply for, or enroll in Bridges, please reach out to the Bridges email box for assistance at bridges@jfs.ohio.gov.

Q43: So, when all the adult DD services are in place, but they could also use more support with Bridges why can't that be an option?

A: All young adults who are eligible for Bridges as defined in OAC 5101:2-50-02 that wish to participate in the program can apply regardless of whether they are receiving other supportive services such as DD services. If there are concerns of a young adult being denied the ability to apply for, or enroll in Bridges, please reach out to the Bridges email box for assistance at bridges@jfs.ohio.gov.

Pursuant to ORC 2151.353 (F)(1), the juvenile court can retain jurisdiction and maintain PCSA custody orders for a young adult until age 21 if they have a developmental disability or physical impairment. It may be in a young adult's best interest to have custody maintained with the PCSA

verses enrollment in Bridges, which is a voluntary program. Changes in custody orders should always be made based on what is in the best interest of the young adult.

Q44: Are the Bridges eligibility requirements also waived for youth emancipating from agency custody before 9/30/21?

A: Yes. H.R. 7947 suspended the need to meet eligibility criteria outlined in OAC 5101:2-50-02 (B)(4) for any young adult applying for, or enrolled in, Bridges until September 30, 2021. However, it is still encouraged that young adults emancipating from agency custody are meeting, or working to meet, eligibility criteria to avoid termination after the provisions of H.R. 7947 end.

Q45: Bridges had recently stated that they can only assist young adults that emancipated during the pandemic...if the law has provisions to age 26, then how does that work because no youth would be age 23-26 if they emancipated during the pandemic?

A: All young adults who are eligible for Bridges that wish to participate in the program can apply.

H.R. 7947 allows for any young adult that left foster care due to age during the pandemic period, which began on January 27, 2020, to voluntarily re-enter foster care by enrolling in Bridges. This provision applies to those that left PCSA custody and Bridges.

H.R. 7947 also allows for extended post emancipation services through age 26 during the pandemic. These services would be provided by a PCSA not Bridges. Interested young adults should contact their local PCSA.

Q46: For clarity, young adults currently aged 21-26 who have emancipated are NOT able to get assistance through Bridges?

A: Any young adult that left foster care due to reaching the age of 21 during the pandemic period, which began on January 27, 2020, can voluntarily re-enter foster care by enrolling in Bridges due to H.R. 7947. This provision applies to those that left PCSA custody and Bridges.

For those young adults that emancipated from foster care or left Bridges due to turning age 21 prior to January 27, 2020, can receive extended post emancipation services through age 26 due to H.R. 7947. These services would be provided by a PCSA not Bridges. Interested young adults should contact their local PCSA.

Q47: What is the start date for re-entry?

A: H.R. 7947 allows for any young adult that left foster care due to age during the pandemic period, which began on January 27, 2020, to voluntarily re-enter foster care by enrolling in Bridges. This provision applies to those that left PCSA custody and Bridges.

Q48: Just for clarification... When a child is wanting to come back to "care" are you saying they need to come back through the PCSA as a legal status- custody? or they are going back through Bridges - no custody?

A: H.R. 7947 allows for any young adult that left foster care due to age during the pandemic period, which began on January 27, 2020, to voluntarily re-enter foster care by enrolling in Bridges. This provision applies to those that left PCSA custody and Bridges.

Bridges is Ohio's extended foster care program. All young adult's enrolled in the program sign a Voluntary Participation Agreement which puts them in the custody of ODJFS.

If you are working with a young adult interested in enrolling in Bridges, a referral can be submitted through the program's website: <https://bridgestosuccess.jfs.ohio.gov/> .

Q49: But only to age 21 still for Bridges?

A: H.R. 7947 allowed for temporary changes to Bridges eligibility including allowing a young adult to remain in Bridges past age 21 until the provisions of H.R. 7947 end on September 30, 2021.

Additionally, any young adult that left foster care due to reaching the age of 21 during the pandemic period, which began on January 27, 2020, can voluntarily re-enter foster care by enrolling in Bridges due to H.R. 7947. This provision applies to those that left PCSA custody and Bridges.

For those young adults that left foster care due to reaching the age of 21 prior to January 27, 2020, they can receive extended post emancipation services through age 26 due to H.R. 7947. These services would be provided by a PCSA not Bridges. Interested young adults should contact their local PCSA.

Q50: Isn't Bridges a post emancipation support?

A: Ohio offers two options for post emancipation services:

1. Bridges is an extended foster care program where young adults voluntarily re-enter foster care with ODJFS by signing a Voluntary Participation Agreement.
2. Young Adult Services are offered by all 88 Public Children Service Agencies. Interested young adults should contact their local PCSA.