

Adoption Assistance Connections to Age 21 (AAC) Thursday January 25, 2018

Questions and Answers

If your Agency has questions pertaining to Adoption Assistance Connections to Age 21 (AAC), please feel free to contact AAC Mailbox: AdoptionAssistanceToAge21@ifs.ohio.gov.

Implementation of the AAC Program

Question: If I understood you correctly, the rule will go back on agreements signed on or after October 1st 2010?

Answer: The AAC program has specific eligibility requirements and the Adoption Assistance Agreement was signed when the child was age 16 or 17 and the adoption was finalized prior to age 18. The adopted child must be 18 years of age but not 21 years of age before February 2018.

Question: Will this notification automatically be sent to adoptive families?

Answer: Yes, the State plans to send out notifications to those adoptive parent(s) that adopted children that potentially qualify for the AAC program.

Question: Did you say that we needed to provide the state with potential qualified AA Parents for the AAC program?

Answer: The State is creating an initial list of potential qualified AA families and may ask for PCSA collaboration in verifying that all potentially qualified AA families are included. This will be an ongoing process.

Question: Will this be backdated to when the house bill was passed in 2016 or is it just starting in 2018?

Answer: The AAC program is being implemented as of February 2018.

Question: Will you be looking at terminated AA to see if these children will be eligible?

Answer: Yes, the AAC program will be running queries from the SACWIS application to maintain a current list of potential adoptive families that may qualify.

Applications

Question: Can we scan and email the applications, or must they be mailed?

Answer: At this time, the adoptive parent(s) and adopted young adult can submit applications by mail to the following address:

ODJFS – OFC –
AAC PO Box
183204
Columbus, OH 43218-3204

Question: Should AAC negotiation processes for this program mirror traditional methods?

Answer: Yes, the Adoptive Parent and AAC Representative will negotiate the Adoption Subsidy. There will be mediation available if negotiations cannot reach an agreement.

Question: How far in advance will the applications be made available to the adoptive parent?

Answer: Currently the timeline has not been finalized.

Question: So, if the AA has now been terminated but we feel this child would be eligible we can ask them to be submitting their application now?

Answer: Yes.

Question: Is this program given in addition to Bridges, or in place of Bridges?

Answer: House Bill 50 included two proponents – one for Foster Care (Bridges) and the other for Adoption Assistance (AAC). A youth cannot qualify for both.

State Administration

Question: Will the agency (PCSA) be responsible for verifying and sending out applications or is this a program we only need to let the adoptive parent be aware about and give them the information they need to be able to fill out an application and submit it?

Answer: The State will be responsible for verifying and sending out applications for AAC. The State is asking for the collaboration of the PCSAs to inform adoptive parent(s) about the program and provide them information as necessary.

Multiple Questions:

Who negotiates this?

Since the state is identifying these eligible kids, will county PCSA be obligated to attend Mediation, hearing, if they are denied?

Will the PCSA be responsible for completing the AAC agreement?

Will the counties be in charge of verifying the semi-annual parent responsibility?

Is the local agency entering anything into SACWIS, or how will we know if child is approved?

If you negotiate a new amount is the State input into SACWIS or do the counties have to do it?

If an overpayment is determined will the state or county be responsible for managing the repayment process?

Will the county or state be paying the non-federal portion of the subsidy?

You stated that State will Semi-Annually check the parental responsibility. Will all that information also be sent to the Counties? Or the information will be kept at the State and the State will maintain the record for ACC program?

Answer: The State will be responsible for the AAC Program, will maintain the AAC record, will enter all data into SACWIS, and is responsible for the full non-federal share.

Question: If the family can receive either AA or AAC how will the county know the family is receiving AAC to avoid the family AA and AAC?

Answer: The State expects PCSAs to serve those adopted children/families that are eligible for AA beyond the age of 18 due to a documented special need. However, a family may elect to terminate their AA and then apply for AAC.

Sharing of Information

Question: What are the OAC rule numbers?

Answer: 5101:2-51-01, 5101:2-51-02, 5101:2-51-03.

<http://emanuals.ifs.ohio.gov/FamChild/FCASM/MgmtAdmin/>

Question: What are the form numbers for the application and agreement for AAC?

Answer: The AAC Application is the JFS 00147. The AAC Agreement is the JFS 00148.

Question: Can the PCSA get a copy of the letter that is sent out to families or can it be posted on knowledge base?

Answer: Yes, the letter will be posted on the SACWIS Knowledge Base.

Question: Will you again go over what qualifies for participating in a program or activity ... also the verifications which can be used?

Answer: The AAC Acceptable Forms of Documentation list is posted on the SACWIS Knowledge Base.

Question: Do you have pamphlets or booklets with the information I can give to adoptive parents?

Answer: The State is working on creating a pamphlet.

Question: This can be viewed as an incentive for adoption of older children. Will there be info from state to share will adoptive parents as a recruiting tool to find more adoptive parents of this harder to place age group?

Answer: Yes, this is an incentive to adopt older children aged 16 or 17. The Adoption Subsidies Guide (JFS 01985, Rev.10/2017) is being revised to include AAC.

Question: Will any broad-based notifications be sent to families who are eligible for AAC, after the initial letters are shared with counties? Having this information will assist the county if they receive any inquiries concerning a letter received.

Answer: Other than the letter to potential applicants, the State will update the Adoption Subsidies Guide (JFS 01985, Rev.10/2017) to include the AAC program.

Question: Will the county be notified if parents decide to participate in the AAC program?

Answer: There will not be any automatic notifications to the county.

Question: Is there a phone number you can provide at the county level for adoptive parents to contact at State level?

Answer: All questions should be referred to AdoptionAssistanceToAge21@jfs.ohio.gov.

Question: If the family is asking us when their child turns 18 what program to file for and what is the benefit of the AAC program what do we say?

Answer: The State expects PCSAs to serve those adopted children/families that are eligible for AA beyond the age of 18 due to a documented special need. However, a family may select whichever subsidy program in which they want to participate. The adoptive family would benefit most from continuing with the AA program through the PCSA due to continuity of case management/services and annual redetermination. The AAC program is re-determined semi-annually and will be terminated if no response is received from the adoptive parent(s) and adopted young adult every 180 days.

Eligibility Criteria/Redeterminations

Question: Just to clarify, how often does the State check the documentation that the adoptee is meeting the program requirements?

Answer: Every 180 days.

Question: What if an adoptive child moves out at 18 and then moves back in with the adoptive family later and they are then providing parental support. Would they be eligible?

Answer: The child/family can apply when they meet all eligibility requirements of the AAC program.

Question: Will there be Annual Redetermination for AAC as we have for Adoption Assistance?

Answer: The AAC program requires redetermination every 180 days.

Question: Does this still apply if the child is no longer residing with the Adoptive Parents, such as an out of state college?

Answer: Yes, as long as eligibility requirements are met.

Question: Is this only for children who are receiving Title IV-E subsidy or is SAMS included?

Answer: SAMS is not included. It is for children who have or had an AA Agreement.

Question: Does the family have to be residing in Ohio? What if the entire family has moved out of state?

Answer: No, the family does not have to reside in Ohio; however, the child had to be adopted from a PCSA in Ohio.

Age

Question: Can a child adopted at age 5, now turning 18 but parent maintains responsibility while they are in college...does that make them eligible?

Answer: No, the Initial AA Agreement must have been signed at age 16 or 17 years and the adoption finalized by age 18 years. The AAC Program is for those who have achieved age 18 but not yet 21.

Question: If an AA agreement is entered into when the child is 17 but the adoption cannot finalize until after the child is 18 due to the 6-month waiting period, and all other eligibility is met, can the family qualify?

Answer: No, the adoption must be finalized by age 18.

Question: If we have a child who is 19 now but was adopted when she was 16 (3 years ago) will this child still meet the qualification or is this effect 2-1-18?

Answer: If the now 19-year-old was adopted at age 16 and meets all other eligibility criteria set forth, the child would be able to receive AAC Subsidy payments.

Question: A child who was adopted last summer at age 17 would not be eligible?

Answer: Upon the adopted child's 18th birthday, if the child meets eligibility criteria set forth, s/he could be eligible. The adopted child must be 18 years of age but not 21 years of age.

Question: Does the AA agreement have to be completed after Feb 1, 2018 or will others that were in agreement before that date, but match criteria still apply?

Answer: The AA Agreement needed to be signed at age 16 or 17 and the adoption finalized by age 18. Any Adopted Young Adult who meets the eligibility requirements should apply. AAC payments cannot be for prior to February 2018, as the program was not in effect until then.

Question: When will a family receive the application? For example, a family finalizes adoption of a 17-year-old child; when should they apply for the AAC program?

Answer: The state will reach out to prospective families as the program progresses; however, we encourage our county partners, PCSAs and Private Agencies who approve adoptive homes, to provide information to families who may qualify for AAC prior to the adopted youth turning 18. The family can apply for the AAC program once the adopted young adult turns 18. If the adopted child is nearing age 18 and has a special need that can continue AA, the family will need to decide if they want to continue AA or request the PCSA to terminate their AA subsidy at the age of 18 in order to apply for the AAC program. Notification of approval or denial of the AAC program will be made within 30 calendar days of receipt of a completed application and all required documentation.

Question: Please clarify, "by age 18;" does that mean by the day they turn 18, or the entire year of their 18th birthday?

Answer: If this regards adoption finalization, the adoption must be finalized prior to the 18th birthday.

Question: Need clarification on Federal provisions. You have said adoption must be finalized by 18. However, slide on provisions does not say that.

Answer: House Bill 50 extends adoption assistance payments beyond age 18 when all the provisions are met. The provision of adoption is that it must be finalized prior to age 18.

Question: Federal Provisions states that one of the following provisions are met (of the 5) are do all have to meet?

Answer: There is a difference between the Federal Provisions and AAC Program Eligibility Requirements. All Federal Provisions must be met. These Provisions are:

- Were in the permanent custody of an Ohio PCSA
- AA agreement became effective at age 16 or 17
- Adoption finalized by age 18
- Now age 18 but not yet 21
- Parent maintains parental responsibility

AAC Program eligibility includes one of the five Eligibility Requirements being met. These are:

- Is completing secondary education or equivalent
- Is completing post-secondary education or equivalent
- Program participation to remove barriers to employment
- Employed 80 hours or more per month
- Documentation of incapability to do the above by a qualified practitioner

Education/Work

Question: What happens if child drops out for one school term? How does this impact the approval?

Answer: If, at the time of re-determination, the young adult is ineligible due to dropping out of school, they would no longer be eligible for AAC. The adopted parent(s) can always re-apply when all the eligibility criteria are met.

Question: Does the military count as an educational or vocational program?

Answer: No. Once an adopted child enlists in the military, they are considered an emancipated

adult.

Question: If a college student is declared an independent student on their FAFSA does that make them ineligible?

Answer: Correct. To meet this eligibility criteria, the college student must be declared a dependent on the FAFSA.

Question: Can you clarify the medical?

Answer: If the adopted young adult is unable to participate in any of the other work or education activities due to a medical condition, it must be documented by a qualified practitioner. This can be short or long term. For example, written verification from a qualified practitioner who is treating the young adult or a copy of the young adult's social security award letter.

Parental Responsibility

Question: For eligible young adults who are working full time, and not attending school, is the adoptive parent able to get AAC? It would seem that even if they are helping the young adult, the individual is still an adult with full time employment which would seem to negate AAC. When you identify financially responsible, I would hope that there would be an ongoing level of support in order to warrant AAC. An adoptive parent showing a clothing receipt or food receipt as a one-time purchase, does not warrant a monthly check. How will this be addressed?

Answer: If the eligible adopted young adult is working at least 80 hours per month, the adoptive parent would receive AAC subsidy. For ongoing redeterminations, the parental responsibility must be shown not only by the parent but also by the adopted young adult's verification.

Medicaid

Question: So the Medicaid continues as well?

Answer: Yes, if the adopted young adult and family qualify for AAC, they will also receive Medicaid.

Question: Will Medicaid continue if child lives in another state?

Answer: Yes, the adopted young adult would continue to receive Medicaid and Title XX services in the state where they reside.

Question: To add to question about Medicaid being continued in another state, do all states recognize Medicaid for title IV- E AA for children after age 18?

Answer: If any Medicaid or Title XX services are not available in the state in which the adopted young adult resides, the AAC Representative will work to secure services.

Background Checks

Question: Many of the adoptive families have their home studies through private agencies. Would the private agencies be required to provide the background checks to the public agency for this program?

Answer: The State will be requesting collaboration from agencies, both public and private, for a copy of the background check that was completed at the time the adoptive home study was completed. The State is requesting a copy of the AA file from the PCSA per rule (5101:2-51-01). ORC 2151.86(E)(3) addresses the sharing of background checks with ODJFS.

Question: Why not verify this background check info at time of initial AA agreement?

Answer: This had to be completed at the Initial AA Agreement. The State is requesting a copy of the AA file to verify this was completed.

Subsidy

Question: Is the Adoption Assistance re-negotiated with the state when the child turns 18 or will the family keep the amount initially negotiated by the county?

Answer: This will be determined on a case by case basis by the adoptive parent(s) and ODJFS.

Question: I'd heard the AA amount would be \$240.00 for all unless otherwise negotiated. Is this inaccurate?

Answer: This is not accurate. The maximum amount of the AAC payment shall not exceed the cost of the FCM payment that was paid or would have been paid if the adopted young adult had remained in foster care.

Question: Will the county still be able to pay a subsidy for the same children, or is it an either/or?

Answer: The family can either receive AA or AAC if they qualify for both. It will be the family's choice. The family cannot receive both.

Question: Apart from the \$\$ what other services will the state be providing to youth that is eligible for AAC?

Answer: Medicaid and Title XX benefits.

Overpayments

Question: You stated that a class schedule is considered valid documentation. What happens if a class schedule is received and at the next review it is found the child did not attend school? Will the AAC payment be considered an overpayment?

Answer: The State will determine all overpayments on a case by case basis. However, the adoptive parent is required to notify the state if there are changes to the adopted young adult's eligibility.

Reapplication

Question: If denied the first time, can a family reapply if circumstances change?

Answer: Yes.

Question: So, if a child is not eligible at age 18 because they don't meet one of the 5 criteria, but then becomes eligible (ex. they go back to school) before the age of 21, they could then be eligible?

Answer: Yes.

Question: Does the adoptive parent contact the local agency if they want to apply again after 18 years of age or contact the STATE?

Answer: The adoptive parent would contact the State.

Other

Question: Will the termination/modification of an agreement in this program be the same as regular adoption assistance...because you had just stated if a requirement was not met, that the adoption assistance connection would be terminated and they could reapply. We are not allowed to terminate regular AA unless everyone agrees?

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Answer: The AAC program is different. There are eligibility requirements that need to be met initially and semi-annually. If no eligibility requirements are not met at redetermination, AAC would terminate. The family can re-apply for AAC if one of the five eligibility requirements are met at a later time.

Question: How will this affect the County IV-E ratio if the State is subsidizing this program? Thank you.

Answer: It will not have any impact on the County IV-E ratio. These subsidies will not be reported on the JFS 04281.

Question: Will AA continue or will there be a break in coverage until the state approves? Whose responsibility will it be to end the AA record in order for the parent to participate in the AAC program?

Answer: Due to AAC Program implementation, there may be a gap in coverage; however, as this program moves forward, the State intends to have this be a transition without gap. The AA record will terminate at age 18 or 21 (with documented physical condition) automatically. The county will be responsible for terminating the AA record after age 18 should the family wish to switch to AAC as the adoptive parent would have to request a termination of the AA agreement in order to receive AAC.

Question: Why would there be a choice to stay with the county? What is the incentive for the family to change to the state program?

Answer: The State expects PCSAs to serve those adopted children/families that are eligible for AA beyond the age of 18 due to a documented special need. However, a family may select whichever subsidy program in which they want to participate. Should the family begin with AA and wish to switch to AAC, the adoptive parent would have to request a termination of the AA Agreement with the PCSA and then can apply for AAC.

Question: Does income from AAC count towards financial aid, or public assistance programs?

Answer: No, this income does not.