Local Commissioners Memorandum

Section 1

<table>
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<tr>
<th>Transmittal:</th>
<th>15-LCM-05</th>
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<td>To:</td>
<td>Local District Commissioners</td>
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<tr>
<td>Issuing Division/Office:</td>
<td>Office of Budget, Finance &amp; Data Management</td>
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<td>Date:</td>
<td>April 28, 2015</td>
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<td>Subject:</td>
<td>Submission of TANF Claims/FFFS Plans</td>
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<tr>
<td>Contact Person(s):</td>
<td>Edward Conway (Regions 1-5) 518-474-7549</td>
</tr>
<tr>
<td></td>
<td><a href="mailto:Edward.Conway@otda.ny.gov">Edward.Conway@otda.ny.gov</a></td>
</tr>
<tr>
<td></td>
<td>Michael Simon (Region 6) 212-961-8250</td>
</tr>
<tr>
<td></td>
<td><a href="mailto:Michael.Simon@otda.ny.gov">Michael.Simon@otda.ny.gov</a></td>
</tr>
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<td>Attachments:</td>
<td>None</td>
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Section 2

I. Purpose

The purpose of this Local Commissioners Memorandum (LCM) is to notify Social Services Districts (SSDs) of a June 30, 2015 deadline for the submission of Temporary Assistance for Needy Families (TANF) Special Project claims, RF2 - Monthly Statement of Assistance Expenditures and Claims for Federal and State Aid (LDSS-1272), and RF2A - Monthly Statement of Administrative Expenditures Federal and State Aid (LDSS-1272A) TANF expenditures identified in Section 2 III: Program Implications for expenditures through September 30, 2014. The June 30, 2015 deadline also applies to Flexible Fund for Family Services (FFFS) plan revisions for corresponding expenditures through September 30, 2014. Please note Title XX and Child Care Block Grant (CCBG) transfer amounts cannot be changed.

This deadline does not apply to Child Welfare and Non-Residential Domestic Violence claims which had a March 31, 2015 deadline.

II. Background

SSDs are advised that TANF Special Project claims for expenditures for the period October 1, 2013 through September 30, 2014 must be final accepted by June 30, 2015 to the OTDA Bureau of Financial Services as applicable via the RF-17 Claim Package in the Automated Claiming System (ACS).
For Child Welfare and Non Residential Domestic Violence FFFS 2014 related programs, the claiming deadline was March 31, 2015 with the exception of PINS/Prevention/Detention Diversion Services within FFFS which has a claiming deadline of June 30, 2015. These claiming deadlines are established in order to evaluate the status of spending against obligations established at the State level for the Federal Fiscal Year (FFY) 2013/2014.

As allocations are announced to SSDs, OTDA reports those allocations as an obligation(s) on the TANF Federal Financial Report. In order to determine the amount of Federal funds that will be liquidated, the State needs to have claims final accepted by June 30, 2015 for all expenditures made from October 1, 2013 through September 30, 2014 even if the program continues past that date. The same principle applies to FFFS plan expenditures with ending dates of September 30, 2014, since obligations were established for the TANF FFY 2013/2014 grant based on dates established in approved SSD FFFS plans. As SSDs revise their FFFS plans and allocations are changed in these plans, OTDA needs to modify obligation(s) reported to the Federal government.

III. Program Implications

Expenditures for the following projects made by SSDs for the period October 1, 2013 through September 30, 2014, must be final accepted in the ACS RF-17 by June 30, 2015.

DET PREV FFFS 14  
FFFS 2014 PLAN 10  
NON-RECURRENT FFFS 14  
NON RES DV 10,11,12 and 13  
TRANSPORTATION INITIATIVE

Claims for expenditures made through September 30, 2014, will not be reimbursed if submitted after June 30, 2015.

The June 30, 2015 deadline also applies to certain Schedule D - DSS Administrative Expense Allocation and Distribution by Function and Program (LDSS-2347) related TANF expenditures reported on the Schedule D-2 Allocation For Claiming General Services Administration Expenditures (LDSS-2347-B), Schedule D-3 Allocation And Claiming Of Administrative Costs For Employment Programs (LDSS-2347-B1), Schedule D-6 Reimbursement Claim For Training (LDSS-2347-C) and Schedule D-10 Claiming Of Fraud & Abuse Administrative Costs (LDSS-2347- F). These TANF expenditures, which do not constitute the provision of client assistance benefits under Federal TANF rules, also must be final accepted in ACS by June 30, 2015. Because the TANF deadline does not apply to the other programs reported on these schedules (for example, SNAP E&T), the SSDs should continue to submit such claims for periods prior to October 1, 2014, after the June 30, 2015 deadline. While we will continue to settle the non-TANF portion of these claims after the June 30, 2015 deadline, subject to the claiming rules of the specific program (e.g., two-year claiming limit), the TANF amounts will not be applied toward the FFFS ceiling because they are beyond the deadline. Any necessary adjustments will be made at the State level to the FFFS Ceiling Report.
This deadline also applies to non-assistance costs claimed on the Schedule H - Non Title XX Services for Recipients (LDSS 4283) Columns 3 through 11. Non-assistance costs claimed on Schedules A, C, F and Schedule H Column 2 had a claiming deadline of March 1, 2015, per 14-LCM-12-T Claiming Deadlines for Federal and State Reimbursement.

IV. FFFS Plan Revisions

Plan revisions need to take into consideration expenditures through September 30, 2014. A plan revision needs to be submitted if the end date for any category does not permit sufficient expenditures to liquidate the balance of the allocation. Submission of these plan revisions is necessary in order to notify OTDA of the funds that must be obligated against the proper TANF category. Plan revisions will be reviewed and approved based on adequate statewide obligation balances. If there are insufficient obligation balances, each SSD’s option would then be to adjust federal/state/local shares within a specific category. Below are two examples using the TANF Employment category for which there would be a need to revise the plan.

**Example 1:** A SSD has allocated $10,000 to TANF Employment and expended $12,250 by September 30, 2014. A plan revision is needed to increase the allocation to $12,250, if the SSD expects payment for the additional $2,250. In order to complete this revision, the district must have available allocation in another category which can be transferred to the Employment category.

**Example 2:** A district allocates $15,000 for TANF Employment for the period April 2014-March 2015 and only expects to expend $9,500. A plan revision is needed to move $5,500 over allocated in TANF Employment to another category which is under allocated.

Issued By
Name: Nancy Maney
Title: Director
Division/Office: Office of Budget, Finance and Data Management