

DATE: December 21, 2017

OPERATIONS MEMORANDUM# 17-12-04

SUBJECT: Office of State Inspector General (OSIG) investigation referrals, forms, and domestic violence policy changes.

TO: Executive Directors

FROM: Inez Titus
Director
Bureau of Operations

PURPOSE

To announce changes to OSIG policy and procedures for investigation referrals, forms, and policy.

BACKGROUND

Pennsylvania's Department of Human Services opted to implement the Federal family violence provision at 42 U.S.C. § 602(a)(7) for TANF. This provision allows the Office of Income Maintenance (OIM) to identify TANF individuals with a history of domestic violence and refer them for counseling and supportive services when appropriate. OIM has worked to preserve the safety and security of individuals and families who have been subject to domestic violence by allowing exemptions and good cause from meeting certain TANF program requirements.

Although the FVO option is specific to TANF, both OIM and OSIG recognize the need for care in dealing with domestic violence situations for all individuals when involving investigations.

DISCUSSION

OSIG has updated the policy document titled "*Domestic Violence Observations or Disclosures During Investigations*" (attached), which provides investigation referral procedures for OSIG, CAOs and Child Care Information Services staff to follow when domestic violence is known or discovered.

For cases with open TANF budgets, CAOs will review and apply guidance found in the Family Violence Policies and Procedures chapter (CAH 108) to identify individuals and families at risk, including reviewing the case record for evidence of domestic violence, and

indicate DV on the electronic referral to OSIG. For referrals of cases with no TANF budgets, CAOs will also indicate DV on the electronic referral, but CAH 108 does not apply. OSIG will work with OIM's Bureau of Policy (BOP) to help ensure the continued safety of all individuals and families.

On March 20, 2017, the Office of State Inspector General (OSIG) implemented electronic processing of investigation referrals through the OSIG Avoidance and Recovery System (OARS). Upon implementation, investigation referrals involving domestic violence and confidential cases were handled through a paper process.

Effective December 22, 2017, investigation referrals for cases involving domestic violence will be processed electronically through OARS if the investigation referral was approved by the Bureau of Policy (BOP).

NOTE: Confidential referrals will remain a paper process and will be submitted using the OSIG 12 or OSIG 12R.

The *Electronic Processing of a Field Investigation Referral* document is attached with instructions on how to enter a field investigation referral into OARS. The OSIG 12 and OSIG 12R have been revised along with the instructions for these forms. These documents are also attached.

Investigation referrals to OSIG that involve domestic violence and an open TANF budget will continue to be sent to BOP through the email resource account at RA-PWDFADVREVIEW@pa.gov. If BOP approves the investigation referral, the referral will be completed through OARS, and the question in OARS regarding domestic violence and receiving BOP approval for TANF cases will be checked as "Yes". If BOP denies the investigation referral, the referral will not be sent to OSIG and the action will be narrated in the case record comments and the document scanned into the case record. All non-TANF related referrals that involve domestic violence will be submitted directly through OARS, and the question in OARS regarding domestic violence will be checked as "Yes".

ATTACHMENTS:

[Domestic Violence Observations or Disclosures During Investigations](#)

[OSIG 12 Field Investigation Referral Form](#)

[OSIG 12R Program Integrity Field Investigation Referral Form](#)

[Instructions to complete OSIG 12](#)

[Instructions to complete OSIG 12R](#)

[OSIG Electronic Processing of a Field Investigation Referral Desk Guide](#)

NEXT STEPS

1. Share and review this information with appropriate staff members.
2. Please contact your area manager if you have questions regarding this Operations Memorandum.
3. This Operations Memorandum will become obsolete upon release of revised Handbook changes.
4. Operations Memorandum 15-06-01 is obsolete with publication of this document.