



## DEPARTMENT OF HEALTH SERVICES

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SACRAMENTO, CA 95814

(916) 445-1912

December 6, 1982

To: All County Welfare Directors

Letter No. 82-67

## DEPRIVATION TRAINING PACKAGE

Data from the three most recent Medi-Cal quality control review periods indicate that determining linkage based on deprivation is a major source of quality control dollar errors. Based on the April-September 1981 review period, projected annual misspent dollars from all errors equal approximately \$46 million. Of this, the annual cost due to deprivation errors is projected to be approximately \$11 million. In this same time period, agency errors (as opposed to beneficiary errors) accounted for approximately 35 percent of all errors. This means that the reduction of agency errors has the potential for reducing misspent dollars from all errors by \$16 million and in the deprivation error category alone a potential reduction of almost \$4 million. Thus, we are very concerned about agency-caused errors in general, and in agency-caused deprivation errors in particular.

To assist counties in determining deprivation correctly, we have developed the attached training package. As you use the package, please be aware that as changes to deprivation regulations are made, changes probably will have to be made to this package as well. We plan to keep this package up to date, but it is possible that updates will lag behind the changes in the California Administrative Code, Title 22. Also, I welcome any comments or questions you may have on the package.

However, training of county staff is only one part of the process required to reduce agency errors in determining deprivation. Another significant cause of agency errors is failure of counties to act upon information supplied by beneficiaries that indicates a change in deprivation status. Therefore, unless counties are committed to ensuring that beneficiary-supplied information is acted upon promptly, a significant number of agency-caused errors still will occur even though county staff have been trained to determine deprivation correctly. I urge counties to review their procedures to ensure that such information is processed promptly and to stress in training how these procedures are to be used to prevent such agency-caused errors.

As in the past, beneficiary-caused errors remain our greatest problem. Beneficiary error accounted for approximately 65 percent of all errors. The county must emphasize the beneficiary's responsibilities for reporting all changes in a timely manner even if a status report is not immediately due.

All County Welfare Directors

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December 6, 1982

We are interested in assisting you to reduce deprivation errors. If your county has developed a procedure which may be beneficial to other counties or if you have suggestions about how these errors could be reduced, please forward them to:

Department of Health Services  
Eligibility Branch  
Attention: Marlene Ratner  
714 P Street, Room 1692  
Sacramento, CA 95814

If you have any questions about policies relating to deprivation, please contact your Medi-Cal Program Consultant.

Sincerely,

Original signed by

Madalyn M. Martinez, Chief  
Medi-Cal Eligibility Branch

cc: Medi-Cal Liaisons  
Medi-Cal Program Consultants

Attachment

Linkage to Aid to Families with Dependent Children (AFDC) -- Deprivation  
(Title 22, California Administrative Code, Sections 50205-50216)

Manual Section 50205

Webster's dictionary defines deprivation as the taking away of something; to keep something away from one's possession or enjoyment. For the purpose of the Medi-Cal program, deprivation relates only to children being deprived of parental support or care. "Deprivation" is an important determination because linkage to AFDC cannot exist unless there is a deprived child. Linkage to AFDC exists if a deprived child is living with a relative as defined in Manual Section 50084. Linkage to AFDC means there is federal financial participation (FFP) in the Medi-Cal costs on behalf of the linked individual who is determined eligible. For children, linkage to AFDC is not important since there is FFP for their Medi-Cal costs whether or not there is linkage to AFDC. However, such linkage may be crucial to their parent(s) or caretaker relative. Unless the parent or caretaker is linked to AFDC (or is eligible under a different Medi-Cal program for which FFP is available), that adult, effective January 1, 1983, will be ineligible for Medi-Cal and his/her health needs will be the responsibility of the county of residence. A parent in the home is linked to AFDC if the child is linked to AFDC. If there is no parent in the home, the child's caretaker relative is linked to AFDC if the caretaker is in the same Medi-Cal Family Budget Unit (MFBU) as the child.

There are four basic areas where deprivation may occur for the purpose of Medi-Cal. They are as follows:

1. Deprivation -- Deceased Parent
2. Deprivation -- Physical or Mental Incapacity
3. Deprivation -- Absent Parent
4. Deprivation -- Unemployed Parent

A child who is living with a relative and is deprived under one or more of the above deprivation areas is linked to the AFDC program. Deprivation shall be established if all the conditions of any one of the above four areas is met at any time during the month. If the child meets all of the conditions of more than one area, the eligibility determination shall be based on the deprivation area listed first. However, there is one exception. If the deprivation could be based either on an absent parent or on incapacity and there is a parent in the home with no spouse, then deprivation shall be determined under the absent parent criteria regardless of other deprivation factors. Without the exception, the normal order would require that incapacity is used because it is first on the list of deprivations. Under this exception (i.e., the parent in the home has no spouse), absence is used as the basis for deprivation.

When determining whether linkage to AFDC exists, all family members living in the home shall be considered except those children who are excluded due to the children's income or property. This is covered in Section 50381 of the Medi-Cal Eligibility Manual. If a child in the home is ineligible (e.g., there is a refusal to apply for a Social Security number (SSN)), the child still is considered in determining linkage.

The following covers each of the four deprivation areas in detail.

I. Deprivation -- Deceased Parent (Manual Section 50209)

Deprivation exists when at least one parent is deceased. However, as mentioned above, if the child has income and resources of his own and is excluded from the MFBU according to Section 50381, this child is not considered in determining the MFBU's linkage to AFDC.

Evidence of death includes such things as:

- A. A copy of the death certificate.
- B. An award letter from the Social Security Administration based on the death of the parent.
- C. A newspaper account of the parent's death.
- D. A memorial folder.

When deprivation due to death is established, the following persons are linked:

- A. The child(ren) of the deceased parent;
- B. The parent who lives with the deprived child(ren); or
- C. If both parents are deceased, the caretaker relative can be linked if he/she is included in the same MFBU as the child(ren).

II. Deprivation -- Physical or Mental Incapacity of a Parent (Manual Section 50211)

Deprivation in this category is defined as the incapacity of a parent to support or care for the child. Incapacity can be either (or both) a physical deficiency or a mental deficiency that prevents a parent from caring for the child. The deficiency must last at least 30 days and either (1) substantially reduce or eliminate the parent's ability to support or care for the child or (2) cause one of the following situations listed in Section 50211 (b) (2) (a) to occur. They are summarized as follows:

- A. The mental or physical problem prevents the parent from working in his/her present position and from working in another position in another occupation of which he/she has knowledge or could learn by on-the-job training.
- B. Employers refuse to hire the parent due to behavioral or other disorders which would interfere in his/her obtaining employment or with his/her employment performance.
- C. The disorder prevents the parent from accomplishing the same tasks as other employees, thus preventing him/her from earning the same wage.
- D. The parent is blind or disabled.
- E. The parent has either qualified for or is employed in a position which is considered rehabilitative or therapeutic. The parent also may work in a sheltered workshop as long as this is not full time.

Types of evidence to verify that incapacity exists are contained in Manual Section 50167. They include:

- A. Eligibility for Old Age Survivors and Disability Insurance, Supplementary Security Income/State Supplementary Payment, worker's compensation, or SDI benefits based upon the parent's disability or blindness.
- B. A current Medical Report (form CA 341) or a written statement from a physician, licensed or certified psychologist, or authorized member of his/her staff with access to the parent's medical records which documents that incapacity exists and gives the expected duration of the condition.

When deprivation due to incapacity is established, the following persons are linked:

- A. The child(ren) of the incapacitated parent.
- B. The incapacitated parent.
- C. The spouse of the incapacitated parent (which includes the second parent of these deprived children).

### III. Deprivation -- Absent Parent (Manual Section 50213)

Deprivation exists when there is continued absence of one or both parents from the home. That is, deprivation exists when the natural or adoptive parent is physically absent and there is an interruption or

marked reduction in family or marital ties. This, however, does not mean that continued absence exists if one or both parents is on vacation, seeking employment away from the home, or is away from home for other similar reasons. (According to Section 50071, that type of absence constitutes temporary absence.)

According to regulations, continued absence constitutes deprivation if the absence is:

- A. Of such a nature to interrupt, terminate, or preclude the parent's functioning as the provider of maintenance, physical care, or guidance for the children.
- B. Of a known or indefinite duration which would preclude counting on the parent's performance of the function of planning for the present support or care of the children.

The absence of a parent who is on active duty with the military may or may not constitute deprivation depending upon whether there is an interruption or reduction in marital or family responsibilities. All relevant factors are to be considered, including the following:

- A. Length of absence.
- B. Duty station.
- C. Financial impact based on the duty station.
- D. Employment of other family members.

If the parent in the home has stated on the Statement of Facts that the other parent has left the family, this shall be considered to mean that there is continued absence unless the county department has conflicting information. In the case of conflicting information, the written statement shall be supported by at least one of the following:

- A. Written statements of the absent parent or other persons with prior knowledge of the family relationship.
- B. The actions of the applicant or beneficiary or the absent parent clearly indicate:
  - 1. Physical absence of the other parent.
  - 2. Interruption of or marked reduction in marital and family responsibilities.
- C. Other evidence that substantiates continued absence.

When deprivation due to continued absence exists, the following are linked:

- A. If the parent of the child(ren) who is deprived is married and his/her spouse has children from a prior union who are in the MFBU and are also deprived due to the continued absence of their other parent (1) the children of each parent, other than mutual children, and (2) one parent are linked by absence.\*
- B. Otherwise, the child of the absent parent and the parent in the home are linked by absence.

IV. Deprivation -- Unemployed Parent (Manual Section 50215)

Deprivation occurs when the parent with whom the child(ren) lives is the principal wage earner (as defined in A below), is unemployed (as summarized in B below), and meets the eight conditions listed in C below.

- A. The principal wage earner is the parent who has earned the greater amount of income in the 24-month period immediately preceding the month of application. The parent's statement is acceptable. If both parents earned identical amounts, either parent can be the principal wage earner. Once this determination is made, this parent continues to be the principal wage earner until there is a break in eligibility under the unemployed parent program (either Aid to Families with Dependent Children-Unemployed Parent Segment (AFDC-U) cash or AFDC-U Medi-Cal only).
- B. The term unemployed means:
  - 1. Not working.
  - 2. Employed on a part-time basis, less than 100 hours per month.
  - 3. Employed on an intermittent basis more than 100 hours per month and the hours in excess of 100 hours are of a temporary nature. Temporary nature is shown if the parent was under the 100-hour standard for the 2 prior calendar months and is expected to be under the standard during the next month.
  - 4. Enrolled in an education or work training program that would provide for the future support of his/her family provided that three requirements are met:

\* Regulations are in process to allow linkage of both the parent and the spouse under the absence deprivation.

- a. The program is directed to a specific occupation and that occupation is in demand in the area. The enrollee must also be rated as qualified for that position upon completion of the program.
- b. The program will be completed within two years.
- c. The program must not be involved in postbaccalaureate work.

The following are considered employment and not training: Comprehensive Employment Training Act (CETA) On-the-Job Training, CETA Public Service Employment, or CETA work experience.

Evidence of unemployment includes statements from employers about hours worked or current receipt of Unemployment Insurance Benefits (UIBs).

- C. For deprivation on the basis of unemployment to be established, the unemployed principal wage earner parent must meet all of the following eight conditions:

1. Has not been employed, or has worked less than 100 hours in the last 30 days.
2. Is actively seeking employment and is available for work.
3. Has not without good cause in the last 30 days:
  - a. Quit a job or employment-related training.
  - b. Refused a bona fide offer of employment or employment-related training.

However both 3.a and 3.b may not apply if the unemployed parent has good cause for refusing employment (Section 50216). Good cause exists if:

- a. The offer of employment was from an employer who did not:
  - (1) Possess an appropriate license to engage in business.
  - (2) Withhold or hold in trust the employee contributions required by Part 2 of Division 1 of the Unemployment Insurance Code, Section 2601 et seq., for unemployment compensation disability benefits and does not transmit all such employee contributions to the Department of Benefit Payments as required by Section 986 of the Unemployment Insurance Code.



- (3) Carry either worker's compensation insurance or possess a certificate of self-insurance as required by Division 4 of the Labor Code, Section 3201 et seq.
- b. The employment or training violated applicable health and safety laws and regulations.
- c. The wage offered for the employment or training was less than the applicable state or federal minimum wage or was lower than the customary wage in the community for that particular employment or training as set by the Employment Development Department, whichever is higher.
- d. The acceptance of employment would preclude completion of a job training or educational program approved by the State or county.
- e. The training or job was available due directly to a bona fide strike or lockout.
- f. The employment or training was in excess of the individual's mental or physical capacity.
- g. The individual was ill or required to care for an ill member of the immediate family and no other care arrangements were feasible.
- h. Child care arrangements could not be made.
- i. The individual was without a means of getting to or from the place of employment or training.
- 4. The parent must either have applied for or possess a valid SSN.
- 5. The unemployed parent has not refused to do the following:
  - a. Refused to apply for unemployment benefits.
  - b. Refused to accept unemployment insurance benefits for which he/she is entitled.
- 6. The unemployed parent must establish a connection with the labor force in either of the following ways:
  - a. By meeting either of the following requirements in 6 calendar quarters within any 13-calendar-quarter period ending within the year prior to the month of application

for Medi-Cal. Work quarters and training quarters may be mixed to arrive at the required six quarters.

- (1) Earned gross income of \$50 or more during any quarter.
- (2) Participated for five days or more during any quarter in any one of the following:
  - (a) Community work training project.
  - (b) Employment Opportunity Act Title V Project.
  - (c) Employment Training Services Project.
  - (d) Work Incentive Project (WIN).
  - (e) Any other WIN equivalent program administered by any manpower program.

Both the WIN training and the WIN equivalent program must meet local employers' requirements so that the individual will be in a competitive position within the labor market. Therefore, any vocationally-oriented training program which is provided to assist individuals prepare for employment and improve their competitive position in the labor market, e.g., "English as a second language for refugees", may be counted towards the quarters of coverage to establish a connection to the labor force.

- b. Have received or been eligible to receive UIB benefits within one year before the month of application. UIB eligibility is determined in the following manner and either is acceptable.
  - (1) Unemployed person is eligible to receive benefits upon filing an application.
  - (2) Unemployed person performed work not covered by Unemployment Compensation Law. That work combined with other covered work would make an individual eligible upon filing an application for UIB benefits.
7. Is not unemployed by reason of conduct or circumstances which result in disqualification for UIB. Please note that as of August 1982 a regulations package has been initiated to delete this requirement.

8. Is not unemployed throughout the month as a result of participation in a labor dispute.

When deprivation on the basis of unemployment is established, the following persons are linked:

1. The child(ren) of the unemployed parent.
2. The unemployed parent.
3. The second parent of the deprived child(ren).

## Examples

### Death

1. A husband and wife have two children. The husband dies. The wife is left with two children. Is there deprivation?

Answer: Yes. Death of a parent constitutes deprivation. The wife and two children are linked to AFDC.

2. A father and mother are unmarried and have two children in common. The father dies. The mother is left with two children. Is there deprivation?

Answer: Yes. Death of a parent (whether or not he/she was married to the other parent) constitutes deprivation. The mother and the two children are linked.

3. A husband and wife have one child. The husband goes on a boating trip and is presumed lost at sea. He has been missing over 30 days, and the search is called off. The wife comes in and applies for Medi-Cal for herself and her child. Is there deprivation?

Answer: Yes. The preponderance of the evidence establishes the death of a parent; however, it would not be incorrect to instead base deprivation on continued absence. The mother and child are linked.

4. A husband and wife have adopted four children. The wife dies in an auto accident. Is there deprivation?

Answer: Yes. For adopted children, adoptive parents take the place of natural parents in determining deprivation. The husband and four children are linked.

5. A husband and wife are married. The wife has a child by another marriage, but the husband does not adopt the child. The husband dies. Is there deprivation?

Answer: Yes, but not due to the death of the stepfather since deprivation is based only on a parent's ability to support and care for a child. Deprivation would be based on the child's father's death or absence. The wife and child are linked.

### Physical or Mental Incapacity

1. A father and mother are married and have three children. The husband was a construction worker. He is injured on the job. The husband is in the hospital in a coma for the last 28 days. Is there deprivation?

Answer: Yes. The deficiency is expected to last at least 30 days. Even if the husband were to regain consciousness on the 29th day, he would still be incapacitated for longer than 30 days and would not have the capacity to support his child or care for the child. The mother, father, and child are linked due to incapacity.

2. A mother and father are married. They have two children. The mother is injured in an auto accident, has two broken legs, and two broken arms. Expected recovery time is six months. Is there deprivation?

Answer: Yes. The deficiency will last longer than 30 days and will substantially reduce the parent's ability to care for her children. The parents and both children are linked due to incapacity.

3. A husband and wife have five children. The husband is a construction worker who is injured on the job. He loses one of his limbs. He cannot return to his old position. The physician stated on the CA 341 that the husband's incapacity will last for two months and he will be unable to do any work during that time. Is there deprivation? If so, for how long?

Answer: Yes. There is deprivation due to incapacity for two months because of a physical problem which prevents him from returning to his former occupation or to any other occupation. The husband, wife, and five children are linked. If, at the end of the two-month period, the physician completes another CA 341 stating that the husband still cannot work for another period of time, deprivation will continue through that additional period.

4. A husband and wife have two children. The husband was a computer programmer. As a result of an auto accident, he suffered brain damage. The damage did not prevent him from performing the technical aspect of his job; however, it altered his personality and behavioral patterns to the point that he could no longer perform his job. Because of this disorder, other attempts to secure employment have been futile. Is there deprivation?

Answer: Yes. A mental problem which prevents one from securing and maintaining employment would justify deprivation based on incapacity. The husband, wife, and two children are linked.

5. A husband and wife have one child. The husband is a police officer who loses his position due to disciplinary problems, e.g., he abuses his prisoners. He cannot obtain another position in his field because no one will hire him. He has no other skills. Is there deprivation?

Answer: Deprivation due to incapacity exists if employers refuse to hire him because of his behavioral problem. The husband, wife, and

child are linked. If the husband could be employed in another job for which he is equipped by education, training, experience, or on-the-job training, deprivation due to incapacity does not exist.

6. A husband and wife have one child. The husband was a banker and is blinded in a bank holdup. Is there deprivation?

Answer: Yes. A parent is blind. The husband, wife, and child are linked.

7. A husband and wife have one child. The husband works for a bank as a keypunch operator. He is paid on the basis of the number of items processed an hour. The husband loses a hand in an auto accident. He returns to work but his production decreases due to the injury, so he is paid less than the other workers. Is there deprivation?

Answer: Yes. The physical disorder prevents the parent from accomplishing the same tasks and his rate of pay is decreased. The husband, wife, and child are linked.

#### Absent Parent

1. A husband and wife have two children. The husband leaves home to seek employment in New York. Is there deprivation?

Answer: No. Temporary absence due to employment does not establish deprivation.

2. A husband and wife have two children. The husband is in the armed forces. He is being assigned to Germany for a period of two years. His wife and family may go with him. His wife works for the State as a Deputy Director of a department and the children are 16 years old and both work. The mother and children refuse to go with him because of employment. Is there deprivation?

Answer: Yes, because of the substantial family disruption which would occur due to giving up employment. The wife and two children are linked.

3. A husband and wife have one child. The husband separates from his wife. The wife applies for Medi-Cal for herself and child and states on the Statement of Facts that the father left the family. Is there deprivation?

Answer: Yes. The duration of the absence is indefinite and the father is physically absent (not providing guidance to the child). The mother and child are linked.

4. A husband and wife have one child. The husband separates from the wife. The husband provides the following to the child on a monthly basis: medical insurance coverage, financial support in the form of child support payments, and since he has the child every weekend, he provides physical care and guidance during this time. The mother applies for Medi-Cal for herself and her child. Is there deprivation?

Answer: Yes. Although it appears that the husband is providing all needs necessary to the support and guidance of the child, he remains out of the home on a daily basis and his absence is of an indefinite duration. The mother and child are linked

5. A husband and wife have two children. The husband has the children one month and the wife has the children the next month. Is there deprivation?

Answer: Yes. However, two cases must be established. Each case will have a parent and two children included but only one case must be active at any one time for purposes of AFDC linkage. The children are treated as if they were excluded children in the case belonging to the parent with whom they are not residing in that month (i.e., for purposes of linkage, the children are not considered).

#### Unemployed Parent

1. In determining a connection to the labor force, how are the calendar quarters computed for purposes of the "earn \$50 or be in training" in 6 calendar quarters within any 13-calendar-quarter period?

Answer:

- a. Begin with the quarter in which application is made.
  - b. Including the quarter of application, count back 17 quarters.
  - c. In that period of time, pick 13 consecutive quarters which include 6 quarters of work, 6 quarters of training, or any combination of the two. The selected 13-quarter period must end within 1 year before the date of application. (See illustration on the following page.)
2. An auto worker for ten years was laid off from his job two years ago (November 1980) and has not worked since. His UIB benefits were exhausted July 1981. Assume he applied for Medi-Cal on August 1, 1982. Is there a connection to the labor force?

Answer: Yes. He worked ten quarters from the July through September 1978 quarter to the October through December 1980 quarter, earning at least \$50 per quarter. There were at least 6 quarters in any of the 4 groups of 13 quarters ending within 1 year before the date of application.

YEAR	78	78	78	78	79	79	79	79	80	80	80	80	81	81	81	81	82	82	82	82
QUARTER	JAN MAR	APR JUN	JUL SEP	OCT DEC	JAN MAR	APR JUN	JUL SEP	OCT DEC	JAN MAR	APR JUN	JUL SEP	OCT DEC	JAN MAR	APR JUN	JUL SEP	OCT DEC	JAN MAR	APR JUN	JUL SEP	OCT DEC
WORK																				
WORK TRAINING																				

Least Quarter that Ends  
within One Year

Date of Application

Earliest 13 Quarters That End Within One Year

Latest 13 Quarters That End Within One Year

CONNECTION WITH THE LABOR FORCE  
(EAS 41-440.431)



3. A man has never been employed; however, for the past two years he has been in a trade school sponsored by a manpower program. Is there a connection to the labor force?

Answer: Yes, if the training program meets local employers' requirements so that the individual will be in a competitive position within the labor market.

4. A husband and wife have ten children. In the last two years the husband worked full time and his wife worked part time. The husband is laid off from his job. He applies and is approved for UIB benefits. Is there deprivation?

Answer: Yes. The husband is the principal wage earner, is no longer employed, and has been determined eligible for UIB. The husband, wife, and ten children are linked.

5. A husband and wife have two children. In the past two years, the husband worked full time and his wife worked part time. The wife loses her job because of plant closure. Is there deprivation?

Answer: No. The wife is not the principal wage earner.

6. A husband and wife have one child. Neither parent works and neither has ever been employed. Is there deprivation?

Answer: No. They are not connected to the work force.

7. A husband and wife have three children. The husband is employed full time. In June 1982 the wife became unemployed. The wife was employed full time for the last three years and had income equal to or greater than her husband in 12 of the last 24 months. Is there deprivation?

Answer: There would be deprivation if (1) the wife were the principal wage earner (i.e., if either the wife's income exceeded the husband's income during the June 1980 through May 1982 period or if her income equaled his during this period, if she were designated as the principal wage earner) and (2) the remaining requirements of Manual Section 50215 (b) were met (Section IV.C of this package).

8. A husband and wife have eight children. The husband works full time; the wife is not employed. The husband's union goes out on strike. Is there deprivation?

Answer: No. A labor dispute is not considered to be unemployment.

9. A husband and wife have one child. The husband was working full time and the wife was not employed. The husband is released from his employment and has not applied for UIB benefits and refuses to apply. Is there deprivation?

Answer: No. He has refused to apply for UIB benefits.

Other Examples

1. A husband and wife have one mutual child. The wife has two children by a previous marriage and the husband has three children by a previous marriage. They all live together. Neither absent parent is deceased. The father is unemployed according to the provisions of Manual Section 50215. All are requesting Medi-Cal. Is there deprivation for each child? Are the parents linked?

Answer: Yes. The wife's separate children and the husband's separate children are deprived by the absence of a parent. Only one parent may be linked by absence. Assume it is the mother. The mutual child is deprived by the unemployment of his father. Then, the mutual child and the unemployed father are linked by unemployment.

Potential Deprivation of a Child Living in a Home with:

	<u>Two Parents</u>	<u>One Parent -- No Spouse</u>	<u>One Parent and Stepparent</u>	<u>Relative Not a Parent</u>
Death		X	X	X
Incapacity	X	*	X	
Absence		X	X	X
Unemployment	X			

\*The other parent (i.e., the one not in the home) is either dead or absent. If the parent in the home is incapacitated and the other parent is dead, the deprivation order that implies death as a deprivation factor is chosen first. If the parent in the home is incapacitated and the other parent is absent, incapacity as a deprivation factor may not be used if the incapacitated parent has no spouse in the home, even though incapacity is listed before absence in the deprivation order.

# LINKAGE TO AFDC



