



76 South Riverside Drive, 3rd Floor Batavia Ohio 45103 • 513-732-7363 •

CLERMONT COUNTY VETERANS' SERVICE COMMISSION

This manual addresses the various aspects of the financial assistance program. The policies and procedures in this manual are designed to ensure the VSC treat all clients in a fair, equitable and consistent manner, and at the same time ensure the financial award decisions and disbursement process meet the highest professional standards.

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Chapter 1 Program Overview

Section 100 Overview

Chapter 1 provides an overview of contents of the Veterans' Service Commission (VSC) Emergency Financial Assistance Program. Subjects contained in Chapter 1 are as follows:

- Introduction
- VSC Policy Statement for Emergency Financial Assistance
- Emergency Financial Assistance Eligibility
- Applications for Assistance

Section 101 Introduction

1. VSC Authority

Ohio Revised Code (ORC) 5901 provides for the establishment of a Veterans' Service Commission in each county throughout the state of Ohio. The mission of the Veterans' Service Commission (VSC) is to provide advocacy to veterans, active duty members of the Armed Forces of the United States, and their dependents in obtaining benefits and entitlements from federal, state and local agencies.

2. VSC Composition

The Clermont County Veterans' Service Commission consists of five (5) Commissioners.

The Clermont County Court of Common Pleas appoints five (5) Commissioners from nominees submitted by the local chapters of the various congressionally chartered veterans' organizations, i.e. the American Legion (AL), Veterans of Foreign Wars (VFW), American Veterans (AMVETS), Disabled American Veterans (DAV), Military Order of Purple Hearts (MOPH), and Vietnam Veterans of America (VVA), and the Korean War Veterans (KWV). Appointments are for a period of up to five (5) years.

Appointment terms for Commissioners can be renewed and/or extended by the respective appointing authority.

3. VSC Funding

The Clermont County VSC is a county agency and is funded totally from Clermont County property tax revenues to help Clermont County residents. The VSC does not receive any direct federal or state funding. The VSC is not part of the United States federal government, the Department of Veterans' Affairs or any Department of Defense agency. Therefore, the Clermont County VSC has sole jurisdiction to establish its own operating policies, procedures and methods to meet the veterans' service and financial assistance requirements pursuant to ORC Section 5901.01 to 5901.99 and to the provisions in the VSC Emergency Financial Assistance Program.

4. VSC Staffing

The VSC is authorized under ORC 5901 to employ the necessary staff members to assist them in carrying out their VSC duties. The Clermont County VSC employs an Executive Director under ORC 5901.06, Senior Service Officer, Veterans' Service Officers and other administrative personnel to service clients and handle the daily operation of the VSC.

5. VSC Service Functions

There are two major functions within the VSC:

- a. First function is referred to as “Service Assistance”. This function involves assisting clients with the processing of claims for benefits from the federal, state and local governments related to veterans and their military service.
- b. Second function is referred to as “Emergency Financial Assistance”. This function involves providing timely emergency financial assistance to qualifying veterans and their dependents.

6. Emergency Financial Assistance Program

This manual addresses the various aspects of the financial assistance program. The policies and procedures in this manual are designed to ensure the VSC treat all clients in a fair, equitable and consistent manner, and at the same time ensure the financial award decisions and disbursement process meet the highest professional standards. Random monthly audits of emergency financial assistance applications will be conducted by management. The result of these audits will assist in determining the need for additional staff training, policy compliance, Ohio Revised Code compliance and determine the need for any policy changes, additions or revisions.

Section 102 Policy Statement for EFA Program

1. General Statement

It is the policy of the Clermont County Veterans’ Service Commission (VSC) to provide timely emergency financial assistance to any person entitled to it, providing they meet all eligibility requirements, under section 5901.01 to 5901.04 of the Ohio Revised Code (ORC) and the provisions of the VSC Emergency Financial Assistance Program.

2. Emergency Financial Assistance Definition

Emergency Financial Assistance is a short-term temporary program to assist veterans and their dependents on an emergency basis. Financial assistance is not a pension, income supplement or an automatic entitlement program.

*Definition of income supplement: Income supplement shall be considered to exist when the applicant’s monthly obligations routinely exceed the applicant’s monthly income i.e., living above one’s means.

3. Emergency Definition

For the purpose of determining eligibility to receive emergency financial assistance, an “emergency” is a situation that possesses all of the following characteristics:

- It arose unexpectedly
- Created an immediate need for financial assistance
- The situation at hand or in question was not a result of the applicant’s own misconduct

Section 103 Financial Assistance Eligibility

1. Eligibility Defined

In accordance with the Ohio Revised Code (ORC) Title 5901.08, each applicant for emergency financial assistance must be a veteran, active duty member of the Armed Forces of the United States, the spouse, surviving spouse, dependent parent, minor child or ward of a veteran or an active duty member of the Armed Forces. Eligibility requires at least 90 days residency in Clermont County. To demonstrate eligibility, an active duty member of the Armed Forces of the United States, or spouse, must have a current LES (Leave and Earning Statement) or copy of most recent orders.

2. Veteran Defined

As used in section 5901.08 and other sections of the Revised Code with regard to applications for emergency financial assistance under sections 5901.02 to 5901.15 of the Revised Code, “veteran” means either of the following:

- A. A person who served in the Armed Forces of the United States on active military duty for more than 90 days, was discharged from the service under honorable conditions, and who either served on active duty for reasons other than training or while serving on active duty for training, incurred a disability recognized by the Department of Veterans Affairs or Department of Defense as service connected.
- B. A person who served in the United States Merchant Marine, who either served on active duty for reasons other than training or while serving on active duty for training, incurred a disability recognized by the Department of Veterans’ Affairs or Department of Defense as service connected and to whom either of the following applies:
 1. The person has an honorable report of separation from the active duty military service, form DD214 or DD215
 2. The person served in the United States Merchant Marine December 7, 1941 thru December 31, 1946 or died on active duty while serving in a war zone during that period of service.

3. Client Defined

For the purpose of intake requests for emergency financial assistance, an applicant who is a veteran or active duty member of any Armed Force of the United States or service component, a spouse, widow, minor child or ward, parent of a veteran, as described in section 103.1, will be referred to as the “client”.

4. Multiple Periods of Service

Veterans who have received two discharges with at least a one-day separation between them in which one is an Honorable and the other is Under Other Than Honorable Conditions, or a Bad Conduct Discharge (BCD), will not be eligible for Emergency Financial benefits except in the following cases:

- Vet is in receipt of DVA benefits, including hospitalization
- Vet was awarded any decoration that would denote combat participation, i.e., Combat Action Ribbon, Combat Infantryman Badge, Purple Heart, Bronze Star, Silver Star, Army Commendation Medal with V Device, Medal of Honor.

Section 104 Applications for Assistance

1. Application Form

All applications for assistance are made on the forms provided by the Veterans' Service Commission (VSC). This form is called the Emergency Financial Assistance form (EFA). Each EFA includes statements from the client on household income, assets, property, bank accounts, and monthly expenses. The veteran, spouse, power of attorney or payee must complete an application in person unless the applicant is found to be housebound. Only EFA for the veteran, spouse, widow, dependent children and wards of dependent parent's expenses will be considered.

2. Proof of Military Service

Emergency Financial Assistance must also include a legible copy of the veteran's Certificate of Release or Discharge from Active Duty, DD-214 or Certificate of Service, WD-53-55 form, or confirmation through Department of Veterans' Affairs database.

3. Proof of Residency

The client must provide proof of residency in Clermont County for 90 days prior to the date of the Emergency Financial Assistance. If the client is the veteran, the veteran must provide residency proof. If the client is a spouse, widow, divorced spouse, parent or custodian for a veteran's dependent children, the residency proof will be required for the client.

4. Privacy of Information

The Ohio Revised Code (ORC) Section 149.3 and ORC Section 5901.09B provides that Emergency Financial Assistance files are not public record. However, the record of Emergency Financial Assistance approved or denied, including the name, address, occupation of the client, and amount of assistance awarded, is a matter of public record.

5. Verification of Information

The Veterans' Service Commission reserves the right to verify all information provided on EFA application. Falsification of an application may disqualify applicant from receiving benefits, may result in legal effort to obtain repayment of benefits awarded and may result in criminal prosecution.

Chapter 2 Guidelines

Section 200 Overview

Chapter 2 provides information concerning the guidelines for providing Emergency Financial Assistance approved by the Clermont County Veterans' Service Commission (VSC). Subjects contained in Chapter 2 are as follows:

- Approved VSC Guidelines for Emergency Financial Assistance
- Items Not Paid by VSC

Section 201 VSC Approved Guidelines for Emergency Financial Assistance

The primary concern and goal of the Emergency Financial Assistance program is to help veterans and their dependents that are in need of temporary, emergency financial assistance on a short-term basis.

When someone other than the legal spouse or legal dependent of the veteran is living with the veteran, any financial assistance e.g., rent, mortgage, utilities, that is awarded may be pro-rated to cover the veteran, legal spouse, and /or legal dependents only.

Emergency Financial Assistance is not a pension, income supplement, or an automatic entitlement program, but is a short-term temporary program to assist on an emergency basis to provide the basics of life.

1. General Guidelines

- A copy of a current photo ID (drivers license) must be in the client's file.
- All applications must be made in person as outlined in section 104.1 except in the case where the applicant is housebound.
- Total months of eligibility will be determined by total months of active duty up to a maximum of 24 months of lifetime eligibility.
- Persons (Guard and Reserve) who receive VA compensation as a result of an injury incurred on ADT qualify for 12 months of lifetime eligibility.
- Persons who receive VA Compensation because of a medical discharge due to a service connectable condition qualify for a full entitlement of 24 months, even if that veteran has not served a full twenty-four months.
- An applicant cannot receive EFA within thirty days from the date when the applicant received/denied the most recent EFA.
- Households with more than one qualifying veteran will be limited to four helps in a calendar as prescribed above.
- Financial assistance more than four times in a calendar year will only be made in the event of a natural disaster (e.g. fire, earthquake, flood, tornado) or in extreme impairment of gainful employment.
- Financial assistance is limited to 24 "helps" in a lifetime and for an aggregate total of \$15,000 in a lifetime.
- Claimants, who reach the maximum amount of entitlements by EFA policy dated 14 October 2009, will be granted 2 additional months of eligibility.

- In cases where two qualifying veterans divorce/separate, the remaining lifetime entitlements will be split between both veterans.
- Any EFA request pertaining to a family member of an employee of the Clermont County Veterans Service Commission must be reviewed, approved or denied by the Executive Director and/or the Veteran Service Commission.
- Any EFA request pertaining to a current/past employee of the Clermont County Veterans Service Commission must be approved/denied by the Executive Director and/or by the Veteran Service Commission.
- Qualifying individuals on permanent assistance program may request/apply for additional EFA provided they have not reached their maximum entitlements; this excludes the amount of permanent assistance.
- Divorced/Separated Ex-Spouses of the Veteran with a biological child of the Veteran, requesting financial assistance will only be eligible for 1/3 of the amount of helps the Veteran is eligible for. (Example: if Veteran is eligible for 24 lifetime helps then the ex-spouse would only be eligible for 8 lifetime helps as long as the child is considered a dependant)

2. Residency Guidelines

- A. Current residency of the veteran in Clermont County for three prior months (90 days) must be proven each time a client applies for Emergency Financial Assistance.
- B. The Clermont County Veterans' Service Office (VSO) will provide assistance one time when the applicant moves from Clermont County to another county, recognizing the applicant most likely will not qualify for assistance in that county for 90 days. Residence will be verified through the county Auditor site by personnel prior to appointment date
- C. The client must provide proof of three (3) months' residency, other than a handwritten item. The proof must have the client's name; address and a date that is at least three (3) months prior to the date of the current EFA. The VSC does not accept a hand-written statement from a landlord as proof of residency. Driver's licenses may be accepted as proof of residency if the date of issue of the license complies with the current residency timeframe and the address is the current address of the applicant.
- D. The VSC does not consider being in the Veterans Administration Medical Center, or a place of incarceration, e.g., county jail, state prison or state mental facility as proof of residency in Clermont County. The client must submit proof of residency for Clermont County for three months prior to the client's being at the Veterans Administration Medical Center or any other transient rehabilitation centers.
- E. Homeless veterans may qualify for Emergency Financial Assistance only after enrollment into or completion of a work program, e.g., GoodWill Industries or comparable programs or homeless programs. The VSC's first priority shall be contacting support programs equipped to deal with homeless issues.

3. Marriages and Family Certification

- A. A copy of a valid marriage certificate is required to be on file.
- B. A common law statement, if valid in the state where the marriage took place, is acceptable. In Ohio, the common law statement date must be verified to be prior to October 10, 1991. Ohio does not recognize common law marriages after that date.
- C. Widows and widowers need both a marriage certificate and a death certificate on file.
- D. A married veteran's file shall be cross referenced for purposes of on- going assistance.
- E. Custody orders (for those children not living with both biological parents) and birth certificates for all children listed on the EFA are required to be in the client's file.

- F. A veteran's dependent in the household is considered a legal relative if the dependent is under the age of 18 and the biological child of the veteran, or if the veteran has a legal custody order for the dependent (please see 201.3).
- G. The VSC does not consider children over the age of 18 as dependents unless proof is provided that: 1) the child is attending high school; or 2) the child was mentally or physically disabled before the age of 18; or, 3) the dependent is between the ages of 18 and 23, is enrolled fulltime in an institution of higher learning, and lives in the veteran's household.
- H. If the client claims he is paying and/or receiving support payments, verification of custody and support orders is required.
- I. The VSC does not consider a child's Social Security card as proof of parentage or custody. A birth certificate must be provided for each child.
- J. A person with legal custody of a veteran's child can receive EFA for the child. Proof of custody listing ex-spouse as the residential parent is required as well as a copy of the veteran's DD214. In cases where an active-duty member of the Armed Forces gives custody, whether formally or informally, to another person, that person must present a copy of the most recent LES or orders to Active Duty in order to receive EFA.
- K. If the applicant claims to be separated from the active duty veteran, an affidavit must be signed by the applicant, attesting to such.
- L. Income verification must be provided with each application e.g., Social Security statement, VA statement, etc.
- M. Divorced/separated spouses requesting financial assistance based on a qualified child will seek child support from the veteran prior to applying for financial assistance. Proof must be on file prior to granting assistance. Separations (other than for active duty purposes) where there isn't a qualified child present will not qualify for financial assistance.

4. Financial Assistance Limitations

- A. The total monetary assistance a Service Officer may provide to a client is limited to a total of \$1,750.00 per EFA, excluding grocery vouchers.
- B. The Grocery Voucher amounts are as follows:

1 person	\$275.00
2 people	\$330.00
3 people	\$365.00
4 or more people	\$400.00

Qualified Persons

*Grocery Vouchers must be used within 14 days of issuance. Veteran Service Officer may recommend increase/decrease the amount of the grocery voucher in certain circumstances which will be approved by the Director

- C. The maximum amount of emergency assistance a Service Officer may grant is set by the CCVSC and may not be exceeded except upon the finding of extreme hardship by the Executive Director. The Executive Director may authorize an amount of EFA, not to exceed, \$2,000.00. Requests for EFA beyond what the Executive Director is authorized to grant must be heard by the CCVSC.

5. Utilities Guidelines

- A. Payments for utilities will be made directly to the vendor.
- B. Payments for utilities will only be considered if the utilities are in the name of the veteran or spouse and at the location currently claimed as the veteran's residence.
- C. Poor payment history by the claimant may be grounds for denial of assistance by the Veterans Service Officer.
- D. In instances where the Service Officer deems it appropriate to make payment directly to the claimant, receipts for payment of the bill must be provided within 30 days of the assistance. Failure to provide the receipt could bar the claimant from future assistance consideration.
- E. Claimants over the age of 65 and who qualify for HEAP may apply for peak season energy assistance. Assistance will be limited to 1 help per year.

6. Rental & Mortgage Guidelines

- A. In order to be considered for assistance in the form of rent or a mortgage payment, the claimant must provide a current lease agreement or mortgage statement.
- B. Payment for rent and mortgage shall be made to the landlord or mortgage company in most cases. The Veterans Service Commission will not make payment for rent or mortgage assistance if the claimant is living with the landlord or if a family member is the owner of the property.
- C. The Veteran Service Officer will pro-rate/split the requested mortgage/rent payment if claimant is sharing expenses with a live-in/roommate or other non-dependant member of the household.
- D. In cases where the claimant is severely delinquent with rent or mortgage (i.e., delinquent in an amount which cannot be immediately granted by a Service Officer or Executive Director), the VSC upon presentation either of the following two items, may be able to provide assistance.
 - 1. A statement from the claimant's landlord or mortgage company indicating a partial payment is acceptable in lieu of eviction or foreclosure or,
 - 2. Upon receipt of verification from the applicant demonstrating that the applicant can, from his own funds, make a partial payment, the Service Officer may award up to \$1,250 to enable the applicant to make a full payment.

7. Employment Considerations

- A. Sudden unexpected unemployment constitutes a well-grounded claim for EFA. In these cases the applicant must demonstrate that he or she has applied for or is in receipt of unemployment compensation benefits.
- B. Conversely, a pattern of chronic unemployment may be grounds for denial of an EFA application.
- C. All persons who apply to the VSC due to unemployment shall be required to register with the Ohio Means Jobs and provide verification of enrollment.
- D. An applicant who claims to be self-employed must provide their previous year's Federal Income Tax statement and their previous month's bank statement. Refusal to do so could result in a denial of the claim.

8. Emergency Considerations

- A. The VSC employs up to a ten day waiting period for its EFA processing. That is, applications filed during a given week are processed the following week. In emergencies the Executive Director may waive the waiting period. Examples of such situations could include, but are not limited to, a house fire or natural disaster such as a flood.
- B. A police report must accompany EFA applications submitted due to an emergency caused by a robbery or criminal act.
- C. Each application for Emergency Financial Assistance needs to be a “New Emergency” each time you apply.

9. Medical Expenses

- A. The VSC authorizes emergency tooth extractions as reason to grant EFA. This is for extractions only. It is the responsibility of the applicant to provide a written estimate by the provider.
- B. The Veterans Service Commission will not otherwise consider medical expenses, but may help with other authorized items in the hope that the claimant could then afford his/her medications. The Service Officer will then refer the applicant to ODJFS to apply for medical benefits from that agency.
- C. The Service Officer will also assist the veteran in obtaining the services of the VA Medical System.

10. Income Guidelines

- A. The following information may be taken into consideration by the Executive Director or Service Officer to determine the award of financial assistance.
- B. As outlined on the EFA application the applicant is required to provide income information for the past 30 days.
- C. The applicant may be asked to provide copy of his/her pay stubs. For individuals paid bi-weekly this would mean providing their last 2 stubs and for applicants paid weekly, providing their last 4.
- D. Self-employed applicants will be required to provide their previous year’s Federal Income Tax statement and their previous month’s bank statement.
- E. Financial assistance will be considered based on total household income. All income must be disclosed.
- F. Any type of income, including but not limited to, public assistance, grant monies, student loan proceeds, work/study plan monies, income from another household member (whether or not related), dividends or interest, rental income, must be included as income and documented.
- G. Current checking and savings account statements must be submitted with applications.
- H. Assets should be noted, included any cash, cash or loan value of life insurance policies, IRA value and IRA loan value, value of home and any properties, value of auto, etc.

11. Expense Guidelines

- A. As indicated on the EFA application, the applicant will be required to provide his/her last 30 day’s expenses. The applicant may be required to provide verification of payment for these expenses.

- B. The actual bills or written estimates are required any time the client is requesting assistance.
- C. If the applicant is requesting payments for house insurance or property tax payments, verification of the expense should be provided with the application.

12. Deceased Veterans Guidelines

- A. If the veteran is deceased, the VSC must have proof of the veteran's death and a signed affidavit by the claimant verifying the inability to pay for the funeral expenses.
- B. If an award is made by the VSC, funeral bills must be submitted directly to the VSC by the funeral home (consult Ohio Revised Code 5901).

13. Payments for Home Repairs

- A. Assistance may be granted for client's home repairs. Normal income, residency and other policy guidelines must be met, and the client must have written documentation from the repair company stating the nature of the repair needed in order for the application to be considered for approval.
- B. The veteran must also have proof of ownership of the property and must reside at the property.
- C. No repair payment will be made to landlords of rental property occupied by the veteran or client.
- D. Examples of repairs that may be considered are: water heater or plumbing repair or replacement, furnace repair, electric repair, refrigerator or stove repair or other items necessary for normal household living.
- E. No cosmetic or unnecessary repairs or improvements will be considered. Additional information may be requested before granting a decision.

14. Items Not Paid by VSC

- A. The Veterans Service Commission (VSC) does not consider the following to be emergencies issues for the purpose of financial assistance.
 - Rental, lease or mortgage deposits.
 - Rent or mortgage or land contracts to any relative of the veteran.
 - Personal taxes.
 - Cable television/Direct TV.
 - Personal loans.
 - Purchase of school clothes for children.
 - The expense of school projects or graduation expenses.
 - The expense of Christmas or other holidays.
 - Bills in a name other than the veteran, their spouse or a payee for the applicant.
 - The VSC does not pay the landlord if the veteran is living with the landlord.
 - Legal fees to include court ordered fines, penalties, bail and child support payments
 - No financial assistance will be granted to incarcerated claimants after release who were not residents of Clermont County prior to incarceration.

15. Other reasons for denial of EFA benefits:

- Evidence that the applicant lives beyond the means of the household

- Chronic unemployment with no evidence of attempts to become employed.
- Criminal conduct resulting in financial hardship, e.g., DUI, DUS, driving without insurance, shoplifting, non support of child support payments etc.
- Poor financial management or decision making.

16. Decision-making by the VSC

EFA is a privilege and not a right. The VSC, Executive Director and Service Officers will use applications to arrive at the most consistent decisions possible, but at all time reserve the right to make exceptions depending on the facts of a given situation.

Chapter 3 EFA and Claimant's Appeal Process

Section 300 Overview

*Chapter 3 addresses the EFA process, from initial filing of the claim through the appeal process.

Section 301 EFA Request Processing

- Initial Processing: applications for financial assistance are accepted at the VSC Office, Monday through Friday, between the hours of 7:30 a.m. and 4:00p.m. A VSC employee will make a brief, initial review of the application and inform the applicant of their appointment time/date and Service Officer. If a claimant mails in an application the VSC will immediately attempt contact with claimant to set the appointment date and time. If application is mailed, it is ultimately the responsibility of the claimant to ensure the application was received by the VSC.
- Prior to the appointment date, the Veteran Service Officer will review the financial assistance application. If there are any questions concerning the application, the Service Officer may contact the applicant for clarification. The applicant will be required to produce any documents necessary to process the application at the scheduled appointment. This includes but is not limited to proof of income, bank statements, utility bills, and proof of lease/rent/mortgage.
- If an applicant fails to produce all necessary documents at the in-person appointment with the Service Officer, the Service Officer may make an interim denial of EFA. If the applicant wishes, the Service Officer will schedule a second appointment for consideration of the complete application.
- In those cases where a Service Officer has a complete application packet at the first in-person meeting, the Service Officer will notify the applicant whether the EFA will be awarded in whole or in part or denied.
- In those cases where an award of EFA is awarded in part or denied, an applicant may appeal the decision by using the procedure outlined below.

Section 302 Right to Appeal a Partial Award or Denial of EFA

- In those cases where the Service Officer makes a partial award or denies EFA, the Service Officer will notify the applicant of the applicant's right to appeal this decision to the Senior

Service Officer. An applicant who wishes to exercise the right to appeal must, before he or she leaves, make an appointment with the Senior Service Officer.

- B. In cases where the application has been initially processed by the Senior Service Officer, the applicant may appeal the decision of the Senior Service Officer directly to the Executive Director. In all cases the applicant must make an appointment for review with the Director before leaving the VSC Offices.
- C. At the scheduled review meeting with the applicant, the Senior Service Officer will discuss the application with the applicant. The Senior Service Officer may reverse, uphold or modify the decision of the Service Officer. If the applicant is dissatisfied with the decision of the Senior Service Officer, the Senior Service Officer will notify the applicant the he or she may request a reconsideration of decision from the Executive Director. If the applicant wishes to appeal to the Executive Director, the applicant must, before he or she leaves the VSC Offices, make an appointment to meet with the Executive Director. If the applicant seeks a quicker decision, he may request only that the Executive Director review the application packet.
- D. At the scheduled review meeting with the applicant, the Executive Director will discuss the application with the applicant. The Executive Director may reverse, uphold or modify the decision of the Senior Service Officer. If the applicant is dissatisfied with the decision of the Executive Director, the Executive Director will notify the applicant the he or she may request to be heard at a meeting of the VSC, generally held the first Wednesday of every month. If the applicant wishes to appeal the decision of the Executive Director, the applicant must, before he or she leaves the VSC Offices, meet with the Administrative Assistant to be placed on the next VSC agenda.
- E. At the VSC meeting, the members will review summary information regarding the application. The members will also have the application packet available. The applicant will be permitted to address the VSC members for fifteen minutes. The VSC members will discuss their decision in Executive Session and will, thereafter, vote on their decision in Public Session. The VSC may uphold, reverse or modify the decision of the Executive Director. In cases where the applicant chooses not to wait to hear the results of the vote of the VSC, the applicant will be notified of the decision of the VSC by mail. All decisions of the VSC are final.

Chapter 4 Fraud and Sanctions

Section 400 Overview

Chapter 4 deals with those situations in which EFA applicants knowingly try to defraud or deceive the VSC for the purpose of obtaining emergency financial assistance. In all cases where the Executive Director has the reason to believe that an applicant has engaged in fraud, the Executive Director is to contact the Sheriff's office for further investigation and charges, if warranted.

If the Sheriff's Office, after investigation, files criminal charges related to the fraudulent conduct against the applicant, the applicant's ability to apply for and receive EFA will be suspended until such time as the charges are judicially determined.

Thereafter, upon a plea of no contest or guilty or upon conviction on the charges, the VSC will, on the first offense, deny the applicant's ability to apply for and receive EFA for a period of three years. Upon a second offense, the VSC will deny the applicant's ability to apply for and receive EFA permanently.

Section 401 Suspicion of Fraud

- A. If a Service Officer or other VSC employee suspects an applicant of fraud or attempted fraud in the process of applying for or receiving financial assistance from the VSC, the Service Officer or VSC employee will discuss the matter with the Executive Director, presenting all information related to the allegation.
- B. If, after reviewing all relevant information, the Executive Director determines that the applicant may have engaged in conduct that constitutes fraud, he will notify the Sheriff's Office and request further investigation.
- C. Purchasing of restricted items or misuse of the grocery voucher will result in termination of future assistance and possible prosecution. The veteran's signature on the voucher signifies comprehension of the restricted items and use of the voucher.

Section 402 Reinstatement of Eligibility

A client who has been found to have committed fraud shall not be eligible to receive emergency financial assistance until all the following has taken place:

- The period of suspension imposed by the CCVSC has expired
- The claimant has repaid, in full, all funds obtained by his or her fraudulent conduct
- The claimant is found to be otherwise eligible

Section 403 Unacceptable Behavior Defined

Clients of the VSC are expected to conduct themselves appropriately while in the VSC Offices. Examples of unacceptable behavior in the VSC Offices include but are not limited to the following:

- Being under the influence of alcohol or drugs
- Cursing, swearing or making obscene gestures
- Verbally abusing VSC personnel
- Threatening the safety of VSC personnel
- Damaging or threatening to damage personal or office property

Section 404 Disposition of Misconduct Cases

Depending on the severity of the misconduct as described above, the Executive Director may direct the client to leave or may contact the Sheriff's Office for assistance.

Upon recommendation of the Executive Director, the VSC may impose sanctions on a client who repeatedly engages in inappropriate conduct.

Section 405 Grocery Voucher Infringement

Grocery vouchers must be used within two weeks of issue at a Clermont County Krogers location. Krogers outside Clermont County will not be honored.

Buying items outside of the proscribed items listed on the voucher is strictly prohibited. Failure to follow voucher instruction will result in a warning letter or possible restriction from further financial help at the discretion of the Executive Director.

The Clermont County Veterans' Service Commission policy for
Emergency Financial Assistance is adopted this 11th day of September
2023.