



Ohio Department of Human Services

30 East Broad Street, Columbus, Ohio 43266-0423

May 24, 2000

OWF/PRC GUIDANCE LETTER NO. 24

TO: Directors, County Departments of Human Services
Directors, County Public Children Services Agencies
Directors, Child Support Enforcement Agencies

FROM: Jacqueline Romer-Sensky, Director 

SUBJECT: FINANCING SUMMER YOUTH EMPLOYMENT PROGRAMS
THROUGH PRC

This guidance document describes the use of County Department Of Human Services (CDHS) Prevention Retention and Contingency (PRC) funds in conjunction with JTPA and WIA funds to operate a Summer Youth Employment Program (SYEP). It is provided to assist those who are considering the use of PRC funds to expand and enhance the SYEP activities and services. The guidance discusses the issues to consider when developing a County PRC Plan to support SYEP services. It also discusses funding strategies, eligibility and accountability when requirements for SYEP services differ by funding category. It addresses some management strategies a county might consider when contemplating the use of PRC funds for SYEP services. This guidance does not discuss requirements a county will need to consider from the JTPA or WIA perspective.

COUNTY PRC PLAN

TANF Purpose - In general summer youth employment activities can be supported by PRC funds because the wages and services help youth and their families meet the following TANF goals:

1. **To provide assistance to needy families so that the children may be cared for in their homes or the homes of relatives;**
2. **To end dependence of needy parents on government benefits by promoting job preparation, work and marriage;**

Assistance v. Nonassistance - PRC funded wage subsidies do not constitute assistance. Therefore, a county may choose to enroll youth in a PRC funded SYEP without regard to the short term (four months) limitation on assistance. Supportive services to promote employment and prevent dependency are not considered assistance. However, counties are cautioned to not set up a SYEP that pays a youth for community service as that is considered to be assistance and therefore not allowable under PRC.

Eligibility Criteria - When providing PRC services under federal TANF purposes 1 or 2 a county must establish an income standard that defines economically needy. The county is free to include additional eligibility criteria and/or limitations on populations it will serve (i.e. youth between the ages of 16-18 living

with a parent or specified relative). All criteria must be clearly stated in the county's plan. Anyone who
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meets the eligibility requirements is eligible for the service. In order to avoid creating a service eligibility without sufficient funding, great care should be taken in the development of eligibility criteria. WIA limits the number of youth who can be enrolled without regard to financial need to five percent.

Service Description - A county's PRC plan must clearly describe the services available under PRC, eligibility criteria and any limitations or enhancements (i.e. special tutoring services for youth).

Application - As with other PRC services, the county PRC plan must describe the application and the application process for the SYEP. The application must collect sufficient information to establish eligibility for the service. A county PRC plan may employ a standard PRC application for all PRC services in its plan. A county may employ a specific application for some services like wage supplementation or categories of services like SYEP.

When developing a PRC plan, the application process, and defining assistance groups consult OWF/PRC Letter #13 dated February 5, 2000. This guidance provides detailed information on developing the eligibility criteria and application process for PRC services.

FUNDING OPTIONS FOR SYEP

Counties have a variety of options when exploring funding for SYEP services. The option selected by a county will depend upon available resources and local priorities. When a county decides to use more than one funding source, it will need to consider cost sharing strategies for general operating costs. Sources of funds that can support SYEP services are described below:

JTPA II-B - The JTPA program exists until 6/30/00. Until that date, counties have the option of using available II-B funds for planning and operation of a SYEP. These funds can only be used to support activities that benefit JTPA eligible youth. Please refer to JTPA guidelines for allowable activities and appropriate regulations.

WIA - Counties that have an approved Transitional Youth Plan and choose to operate a transitional youth program may use WIA funds prior to 7/1/00. Counties without an approved youth plan may access WIA funds for youth activities after 7/1/00. Like JTPA funds, WIA funds may only be used to support activities that benefit WIA eligible youth. WIA funds may be used to continue services initiated under JTPA for youth.

Please refer to WIA guidelines for allowable activities and appropriate regulations.

PRC - PRC funds may be used for SYEP services. Examples of services that can be funded by PRC are as follows:

1. Wages and Payroll Benefits
2. Monitoring
3. Payroll Administration
4. Tutoring
5. Counseling

7. Achievement Bonuses
8. Classroom Training
9. Transportation (for employed individuals)
10. Work Expenses (e.g., uniform allowance, lunches, parking, etc...)

CDHS sources of funds for PRC include:

1. Combined allocation
2. Incentives
3. PRC DR
4. TANF E & T

MANAGING MULTIPLE FUNDING SOURCES

Eligibility - The eligibility for all funding sources needs to be carefully reviewed. Some youth are eligible for WIA and JTPA but not PRC. Some are eligible for PRC but not WIA or JTPA. In some counties the financial eligibility for PRC may be much higher than WIA or JTPA. JTPA and WIA will cover services for single youth older than 18 while PRC will not (see note in section marked "TANF Purpose" for an exception to this). WIA and JTPA will cover the cost of SYEP services to youth living in foster care and PRC will not.

Generally, most youth eligible for WIA could be financially eligible for PRC if specified in a County PRC Plan. Though financially eligible for PRC funded services there are some youth who are not eligible for PRC funded services (see note in section marked "TANF Purpose" for an exception to this.). The following are categories of youth who could be eligible under WIA guidelines but not TANF although some could be covered under TANF purpose 3 if the county chooses that option:

1. Youth 14 thru 18 with learning disabilities (who are not economically needy)
2. Youth 18-21 without a younger sibling or a child of their own in the household
3. Youth in a detention facility (unless part of a release program)
4. Youth in long term foster care
5. Youth in Independent Living

If a county chooses to enroll these youth, they must use either JTPA or WIA funds for all associated expenses.

Timing - We are in a transitional year with JTPA ending June 30 and WIA beginning July 1. Timing is an important consideration in developing a SYEP. The following table illustrates some combinations of funds a county might consider:

PRIOR TO JUNE 30, 2000	AFTER JULY 1,2000
Transitional WIA & PRC	WIA & PRC
JTPA & PRC	WIA & PRC
JTPA, Transitional WIA & PRC	WIA & PRC
PRC	PRC
WIA	WIA

Cost Sharing - If a county chooses to integrate funding for the operation of a SYEP, it must develop cost sharing principles for charging general operating costs (i.e. planning payroll, processing, monitoring, etc.) to the appropriate cost center. Costs incurred by a CDJFS in the operation of a SYEP will automatically be distributed by the agency's time study reports. All contracts that a county enters into should be charged proportionately to the appropriate funding source. This principle extends to counties where the CDJFS is not the workforce development agency. Consult your ODHS fiscal supervisor when you need guidance on these cost accounting principles.

Performance Measures and Reporting Requirements - Participants who are funded through PRC will not be included in calculations to determine the counties performance under WIA. PRC funded activities and participants should not be reported as WIA youth program participants. PRC funded participants are subject to PRC reporting requirements. Please consult OWF/PRC Guidance Letter # 9a for the program and service reporting requirements for PRC funded services. For PRC funded SYEP's, counties are advised to develop local program goals, outcomes and measures to use as tools to monitor implementation and to determine the success of the program.

MANAGEMENT CONSIDERATIONS

There are major advantages of using PRC funds to augment SYEP services. PRC funds provide additional resources and greater flexibility to counties. A county can develop a more comprehensive approach and tailor the program to the needs of its youth and its community. If a county used PRC funds for the SYEP, it could increase its WIA resources for the year round youth program. Counties are not required to limit the use of PRC funds to summer youth employment. A county may choose, and is encouraged, to subsidize the wages of youth placed in private sector employment. The following management considerations must be carefully weighed when considering a PRC funded SYEP:

Performance Standards - A county can choose to finance most of its participants with TANF funds. As described in this guidance, there are relatively few youth who will not be eligible. Most of the ineligible youth are in categories that are generally considered hard to serve. They will likely include youth who face multiple barriers. Since the county's WIA performance will only be measured through this population, a county risks not meeting the WIA youth prescribed standards.

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Capacity - Counties have the ability through TANF to significantly expand the SYEP beyond what has traditionally been offered through JTPA. Since many counties may use providers who operated SYEPs under JTPA, they need to consider the limitations the provider has to serve such as a finite number of youth. SYEPs require work sites who are cognizant of child labor laws and provide appropriate supervision. In addition, program monitors must be available and should be trained well before the summer program begins. Some providers, although knowledgeable about JTPA youth program, may need additional training in TANF and/or WIA regulations to prepare them to operate an effective SYEP. Auxiliary services that are provided through the SYEPs must be adequate to support the number of youth enrolled. Additionally, counties should consider the worksite location, the participants home location, and who is responsible for transportation.

Estimating Participation - Counties must enroll youth who apply and meet eligibility requirements. When a county expands eligibility, it is often difficult to predict the new enrollment level. This new criteria will create difficulties in determining potential enrollees. The new criteria may generate more applicants than available slots or resources. Counties should be careful not to underestimate who may choose to apply and participate.

Benefits - Counties should consult with their prosecutors to determine the employment relationship, if any, program participants have with the county.

Administration - Counties are advised that operating the summer youth program within the CDHS Public Assistance Fund will require SYEP participants to complete a time study. This may create unmanageable problems for the county's fiscal tracking system. CDHS's that are the workforce development agencies may use a separate account or an outside provider to operate a SYEP. Consult your ODHS fiscal supervisor in developing financial management procedures for summer youth employment.

PRC Plan Development - Careful development of a PRC Plan that clearly defines eligibility requirements and the application procedure is essential to effectively use PRC funds to support SYEP services.

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