



## **Comprehensive Case Management and Employment Program Program Frequently Asked Questions (FAQs)**

*Updated as of 3/24/2016*

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To help inform local officials and administrators this document provides responses to frequently asked questions about the Comprehensive Case Management and Employment Program (CCMEP). These FAQs and other program guidance materials can be found on the CCMEP implementation web page at: <http://humanservices.ohio.gov/CCMEPImplementation/index.stm>

### **1. How do the County Commissioners select the Lead Agency?**

Each board of county commissioners must designate a lead agency responsible for administration of CCMEP no later than May 16<sup>th</sup>, 2016. The lead agency must be one of the following:

- the county department of job and family services, or
- the workforce development agency that serves the county.

Choosing a lead agency is the first key to successful implementation of CCMEP. The Ohio Department of Job and Family Services (ODJFS) recommends that counties choose the lead agency earlier than the May deadline in order to allow the maximum amount of time to develop the county plan, ensure access to training, and establish the necessary partnerships in your community. To designate the lead agency, county commissioners need to sign a resolution (find a sample resolution [here](#)) and send it to [Amy.Smith@jfs.ohio.gov](mailto:Amy.Smith@jfs.ohio.gov)

Regardless of which agency is chosen to be the lead agency, the inclusion of Workforce Innovation and Opportunity Act (WIOA) funds and Temporary Assistance for Needy Families (TANF) funds makes the administration of CCMEP a collaborative effort between both the participating agencies and the local workforce development board.

*(Also see [Fiscal Frequently Asked Questions](#), number 2Q)*

### **2. What is the authority of the local workforce development board?**

Ohio is divided into 20 [local workforce areas](#), each with a governing board to oversee administration of programs authorized by WIOA, including the WIOA youth program. Beginning July 1, 2016 CCMEP will be the operational framework for the WIOA youth program in Ohio. Therefore, each county lead agency

will be responsible for partnering with the local workforce development board as part of administration of the program and must obtain the signature of the chairman of the local workforce development board in the CCMEP county plan.

The board provides strategic and operational oversight, assists in the achievement of the state's strategic and operational vision and goals, and maximizes and continues to improve quality of services and effectiveness of services provided. The local board has the following functions and duties as it pertains to implementation of the WIOA youth program:

- The local workforce development board, in partnership with the chief elected official for the local area, shall conduct oversight for the local youth workforce investment activities authorized under section 129 (c), which includes the implementation of policies and procedures relating to the establishment of the definition and eligibility documentation requirements for the "requires additional assistance to complete an education program or to secure and hold employment" criterion, the identification of local in-demand occupations, identification of available supportive services.
- The local workforce development board, in partnership with the chief elected official for the local area, shall ensure the appropriate use and management of the funds provided under subtitle B for the youth workforce investment activities.
- The local workforce development board, in partnership with the chief elected official for the local area, shall negotiate and reach agreement on WIOA local performance accountability measures.
- The local workforce development board shall identify eligible providers of youth workforce investment activities in the local area by awarding grants or contracts on a competitive basis.

The local board maintains these duties and responsibilities for the administration of CCMEP. Therefore, the board must coordinate with the lead agency to fulfill these roles so that jointly funded TANF and WIOA activities effectively serve CCMEP participants.

*(Also see [Fiscal Frequently Asked Questions](#), number 8Q)*

### **3. How are the youth program providers procured for WIOA-funded services?**

The local workforce development board has responsibility for the procurement of program providers for WIOA youth funding being used to deliver WIOA-funded services in CCMEP. However, the lead agency may choose to conduct framework services in-house (eligibility, assessment, development of an individual opportunity plan), follow-up services, etc.) without going through a competitive procurement process.

Because of the role of the lead agency in the delivery of CCMEP, the procurement process cannot be done by the local workforce development board in isolation. Input is needed to make local area-specific decisions as well as decisions regarding the following:

- Whether or not to include both WIOA and TANF CCMEP funding in the procurement of the youth program providers.
- Whether or not the procurement is completed on a local area or regional basis or by county within the local area.

- How to include flexibility in the procurement of the providers (e.g.; procuring one provider for all services or by procuring services via multiple providers).

(Also see [Fiscal Frequently Asked Questions](#), number 17Q)

#### **4. Can the CCMEP lead agency bid on a request for proposal put out by the local workforce development board?**

Yes, however the local workforce development board must ensure a clear separation between the entities delivering services and the entity setting policy, monitoring providers, and reviewing, recommending, and procuring providers.

As part of the competitive procurement process, the local workforce development board must be aware of whether the CCMEP lead agency would be interested in bidding to become a provider of one or more of those services in order for the lead agency to separate itself from all aspects of the procurement process. While collaboration is essential in the administration of CCMEP, a conflict of interest or the appearance of a conflict must be avoided when the county department of job and family services has been designated as lead agency and is also a procured provider of WIOA services or may be interested in replying to a request for proposal to provide WIOA funded youth services.

#### **5. Will there be a TANF Summer Youth program this summer?**

The 2016 TANF Summer Youth and Employment Program serves youth ages 14 to 24 and will operate from May 1, 2016 through August 31, 2016. After this date, any summer youth eligible for CCMEP should be enrolled in CCMEP in order to receive continued, year-round services. This transition will allow for the youth to be enrolled on a gradual schedule (between July 1, 2016 through August 31, 2016) to ensure all necessary supportive and follow-up services can be maintained while maximizing funding flexibility.

If desired, a county may use its TANF Regular allocation to fund a subsidized youth employment program for non-CCMEP eligible individuals at the end of the 2016 TANF Summer Youth and Employment Program. Counties should include a description of any such program in their Prevention, Retention, and Contingency (PRC) Plan.

(Also see [Fiscal Frequently Asked Questions](#), number 28Q)

#### **6. Who are mandatory and voluntary participants of CCMEP?**

The following individuals who are least 16 but not more than 24 years of age are required to participate or permitted to volunteer to participate in CCMEP in accordance with the following:

##### Required participants:

- Each work-required (work-eligible) individual shall participate in CCMEP as a condition of participating in Ohio Works First (OWF).
- Each low-income individual who is an adult, in-school youth, or out-of-school youth and who is considered to have a barrier to employment under WIOA shall participate in CCMEP as a condition of enrollment in workforce development activities funded by the TANF block grant or

WIOA. See rule [5101:14-1-01](#) (S) of the Administrative Code for the definition of low-income adult as it pertains to the implementation of CCMEP.

Individuals who may volunteer:

- Each OWF participant who is not a work-required (work-eligible) individual may volunteer to participate in CCMEP.
- Each individual receiving benefits and services under the Prevention, Retention, and Contingency (PRC) Program may volunteer to participate in CCMEP.

Regardless of whether the individual is referred to CCMEP either as a mandatory or a voluntary participant, the individual will receive a comprehensive assessment and an individual opportunity plan and will have access to the same set of services, including follow-up services, based upon the individual's needs. All participants will have a common client experience irrespective of how the participant entered the program.

**7. Does the lead agency determine eligibility for OWF as a part of CCMEP?**

OWF is the financial assistance portion of the state's Temporary Assistance to Needy Families (TANF) program, which provides cash benefits to needy families for up to 36 months. A fact sheet with information about OWF can be found here: <https://jfs.ohio.gov/factsheets/owf.pdf>

The authorizing language for CCMEP in HB 64 did not change who determines eligibility for OWF (the county department of job and family services) or the way in which eligibility is determined. Therefore, OWF applicants may continue to be initially assigned (i.e., 1<sup>st</sup> month) to job search and job readiness activities and applicants must continue to undergo an appraisal and complete a self-sufficiency contract prior to authorization of OWF benefits.

The OWF eligibility rules were revised to streamline the eligibility determination process for 16-to-24 year old work-eligible individuals to ensure compliance with the revised code while reducing duplication of effort (when possible). For individuals age 16-to-24 receiving OWF who are work-eligible, the self-sufficiency contract itself will require the recipient to participate in CCMEP and the contract will remain in effect until the individual undergoes an assessment and signs the individual opportunity plan (IOP). If the lead agency determines the individual failed without good cause to appear for the assessment, the individual may be subject to a sanction of their OWF benefits by the county agency. Once signed, the IOP replaces the self-sufficiency contract the participant previously signed and will include all the information that had been included in the self-sufficiency contract.

**8. How is WIOA youth program eligibility determined?**

A determination of WIOA youth and TANF eligibility is required for every individual referred to CCMEP. The WIOA youth eligibility determination will begin with completion of the [JFS-03002](#), the statewide intake application for the WIOA youth program. The application will be used for both low-income and non-low income youth with a barrier to employment to determine WIOA and TANF eligibility.

Out-of-school youth with a barrier to employment do not have to be low-income to be eligible for the WIOA youth program. As a result, there will be some CCMEP participants who are not considered "low-income individuals." The lead agency has the responsibility of collaborating with the local workforce

development board to ensure that the determination of WIOA youth eligibility occurs. The lead agency may contract the responsibility of the eligibility determination to another entity.

The lead agency may refer individuals to the WIOA adult program for CCMEP participants who are not WIOA youth eligible so that an additional funding source, as well as additional services, may be utilized.

### **9. How are WIOA youth ages 14 and 15 years served?**

The WIOA in-school youth program begins at the age of 14, while CCMEP begins at the age of 16. The local workforce development area may continue to serve 14 and 15 year old WIOA in-school youth. Working with 14 and 15 year old youth, the emphasis is on career awareness. Since WIOA youth program funds are directed to CCMEP, these youth may be served using WIOA administration dollars and/or through a referral process to partner programs, including Wagner-Peyser, vocational rehabilitation, local school system, and other partners who serve the local area's youth. Additionally, OhioMeansJobs.com has a variety of services available specific to working with youth on career exploration, resume writing, financial literacy, and other self-service.

### **10. How is an individual determined appropriate for WIOA youth program?**

CCMEP is a new way of working with youth and young adults, which is much different than the traditional ways the WIA and WIOA programs were conducted in the past. The program leverages the new WIOA focus on working with low-income adults and out-of-school youth who have limited skills, lack work experience, and face other barriers to economic success.

CCMEP is considered to be appropriate for all WIOA eligible youth and designed to address the educational, training, and employment needs of the individual, as well as personal needs through provision of supportive services.

An applicant for the WIOA youth program, as well as TANF clients that volunteer, may not be determined ineligible based upon the barriers he or she presents and should be referred to CCMEP where appropriateness and suitability are used to determine which of the CCMEP services will be provided to meet the applicant's needs. CCMEP rules require that the fourteen services "be made available" by each lead agency but do not require that every program participant is entitled to receive each service; only those services that are appropriate and suitable based on the individual's comprehensive assessment should be included in the individual opportunity plan.

### **11. Does CCMEP require the determination of eligibility for both TANF and WIOA?**

In order to maximize both funding streams, lead agencies will be required to determine eligibility for both TANF and WIOA program participants. The proposed rules include TANF and WIOA eligibility criteria and the WIOA youth application ([JFS-03002](#)) includes TANF eligibility questions so that once an applicant has been determined to be WIOA eligible, TANF eligibility may then be explored.

Once an individual has been determined TANF and WIOA eligible, the lead entity has flexibility to determine which funding source will be used to pay for a service. There are a number of things to consider when utilizing either funding source: impact on performance measures; priority of spending; whether or not the cost is allowable; age of participant; and spending limitations for each funding

stream (i.e., TANF "assistance" vs. "non-assistance"). Once funding from either program has been used to provide a service, that individual is "enrolled" into that program. If both funding streams have been used on services for an individual, that individual is then considered "co-enrolled."

ODJFS will be providing training prior to implementing CCMEP to ensure lead agencies have the information necessary to administer the program and make decisions about strategic ways to use TANF and WIOA funding for CCMEP services.

## **12. What is the comprehensive assessment?**

Lead agencies administering CCMEP are required to use the standardized comprehensive assessment form issued by ODJFS ([JFS-03003](#)). The assessment is a tool used to identify barriers to self-sufficiency and determine the job readiness of program participants. For WIOA-funded participants, the comprehensive assessment replaces the objective assessment.

The comprehensive assessment has two constituent parts: The common assessment tool (administered by a case manager) that each lead agency must use in the administration of CCMEP; and a basic skills assessment. The lead agency must work with the local workforce development board to choose a basic skills assessment instrument(s) that is(are) valid and appropriate for the target population.

## **13. What is an individual opportunity plan (IOP)?**

Currently, an individual participating in a WIOA program has their services, strengths, barriers, and goals documented in a form referred to as the "individual service strategy" (ISS). An OWF work-required TANF individual has work activities documented in a self-sufficiency contract. To create a common client experience under CCMEP, the IOP replaces the ISS and replaces the self-sufficiency contract signed at the time of approval of OWF benefits.

Under CCMEP, the ISS refers to the overall approach (or strategy) for providing service to program participants. The individual opportunity plan ([JFS-03004](#)) is to be used statewide by each lead agency to identify strengths, barriers, long and short term goals, supportive services and assignments to activities in which the program participant will engage.

At a minimum, the review of an IOP should include an evaluation of the participant's service strategy and identifying whether or not short and/or long term goals have been achieved or need to be refined. The IOP may be amended and revised as circumstances warrant.

## **14. How much time must a participant be engaged in work activities as a condition of CCMEP?**

Each program participant must be committed to participating in CCMEP for a minimum of 20 hours per week. The lead agency may consider time spent in activities, case management, homework, travel time, etc. as part of the program participant's hours of commitment. The program participant will need to establish good cause for having failed to meet their commitment. Lead agencies may exit a participant for failure to utilize CCMEP services on multiple occasions without good cause.

For CCMEP participants who are work-required OWF recipients, they will be required to participate in CCMEP for a minimum of 20 hours per week or the hour requirement that otherwise would have been assigned as part of OWF, whichever is higher.

**15. Can work-eligible OWF participants be sanctioned if work activities outlined on the IOP are not completed?**

Once signed, the IOP replaces the self-sufficiency contract the participant had previously signed and will include all of the information that had been included in the self-sufficiency contract. Failure without good cause to comply with an IOP is the same as a failure to comply with a self-sufficiency contract and will result in the imposition of a sanction in accordance with rule 5101:1-3-15. The lead agency is the sole determiner of good cause for failures to comply with CCMEP program requirements.

**16. How do CCMEP activities affect OWF work participation rates?**

Because OWF work-eligible individuals ages 16-24 are a required population in CCMEP, there have been a number of questions regarding the OWF work participation rate.

In October 2015, ODJFS submitted a waiver request to the U.S. Department of Health and Human Services (HHS) to gain flexibility in federal rules that govern calculation of work participation rates. Ohio did not request an exemption from the federal program's work requirements. The state will continue to require TANF recipients to engage in work-related activities for the federally required minimum hours and sanction those who fail to comply. However, increasing flexibility supports the state's ability to assign only those activities that improve employment outcomes for individuals receiving assistance.

Regardless of the status of the waiver or the implementation of CCMEP, Ohio will continue to be held by HHS to the requirement to meet the 50% all-family work participation rate and the 90% two-parent work participation rate for required work eligible families (cases) receiving OWF. All required work-eligible cases will be reported on the federal TANF work participation report.

Beginning July 1, 2016 county agencies will be monitored based on their work-eligible population (age 25 and over) not required to participate in CCMEP. A new report will be created to establish a county rate with CCMEP participants excluded to continue to provide feedback and monitor county OWF work participation. (16 to 24 year olds will not be included in the ADCR county dashboard.)

While CCMEP participants will be excluded from county work-participation reports, countable hours will still be counted and reported by the state to HHS. Therefore, activities that work-eligible individuals are engaged in must still be verified and tracked in CRISE (including good cause hours, etc.) to ensure integrity in reporting and that proper notices are issued from CRISE in the event that a sanction of OWF benefits is proposed.

**17. How is work experience implemented in CCMEP?**

Work experience as a CCMEP service includes: summer employment opportunities and other employment opportunities available throughout the school year; pre-apprenticeship programs; internships and job shadowing; on-the-job training opportunities; and traditional work experience

program (WEP) assignments used in the OWF program (and defined in rule 5101:1-3-12.3 of the Administrative Code).

Any activity in which a program participant is paid in full or in part (directly or indirectly) with TANF or WIOA funds is engaged in subsidized employment. A participating agency (regardless of which entity is the lead agency) is prohibited from directly paying any program participant engaged in subsidized employment. This prohibition only relates to wages and not to other allowable payments that might be made to an employed program participant. A procured youth program provider is not subject to this prohibition and may directly pay a program participant for work experience unless such procured youth program provider is also one of the participating agencies.

### **18. What are follow-up services?**

Federal law requires 12 months of follow-up services be provided to every participant that exits the WIOA youth program regardless of the reason for exit. CCMEP is Ohio's WIOA youth program, therefore all participants in CCMEP must receive 12 months of follow-up services after exiting. A lead agency's performance in CCMEP will be based on the program participant's success irrespective of why the youth left CCMEP, so providing follow-up services to all youth is essential to a lead agency's success.

Follow-up includes any service or activity needed to help youth succeed in employment or further education. Some youth will need very little assistance in their transition into the workforce, while others need substantial support. As with services provided before the youth's completion of CCMEP, follow-up services must be based on each youth's individual needs. The purpose of follow up services is to ensure that each youth's transition to employment or further education is successful and that the youth receives appropriate help in facing challenges that come up on the job, in college, or in occupational skill training.

Effective follow-up services should go beyond mere data collection; they support youth as they navigate post-secondary education or employment and should: assist youth in overcoming barriers that may interfere with the achievement of their career objectives; provide proactive and reactive interventions to encourage youth retention in education or employment; assist in a youth's advancement to better jobs or postsecondary education and training; and help troubleshoot employment and personal issues.

### **19. What are the intermediate performance measures?**

Intermediate measures for CCMEP are employment and credential-focused. Unlike primary performance measures, which are based on outcomes after a participant exits, intermediate measures capture impacts of services while participants are in the program. Intermediate measures fall into two categories: 1) those with performance standards; and 2) those without standards that provide demographic data and information about who is served by the program. Intermediate measures are described in further detail in CCMEP Procedure Letter #1.

### **20. What are primary performance measures?**

CCMEP primary performance measures are based on WIOA youth performance measures and tracked at the lead agency (county) level. They include entry into unsubsidized employment, entry into unsubsidized employment, youth placement, credential attainment, median earnings, and job retention.

To capture the effectiveness of serving employers, CCMEP is using job retention as defined in the Workforce Success Measures dashboard established by the Office of Workforce Transformation and the Governor's Executive Workforce Board.

Lead agency performance in CCMEP will include each program participant that signs an individual opportunity plan (IOP) on or after July 1, 2016, regardless of which path (OWF; Prevention, Retention and Contingency; or WIOA Youth) the program participant took to get into CCMEP. The lead agency will determine which funding source is used (TANF and/or WIOA) to provide services to CCMEP program participants. Only those participants who receive a WIOA-funded service will be part of the Department of Labor (DOL) –WIOA youth performance measures tracked at the local workforce area level.

Measuring CCMEP performance (although similar) is separate and distinct from measuring WIOA performance. In WIOA, local workforce area performance is based upon the number of individuals that received a WIOA-funded service; in CCMEP, performance is county-based and each lead agency will have performance standards measured based upon all individuals in CCMEP regardless of whether their services are paid for by WIOA or TANF.

Given the difference between the WIOA and CCMEP measurements (individuals having received a WIOA-funded service vs. individuals that received any-funded service), lead agencies will have an opportunity to negotiate its CCMEP performance standards with ODJFS. The local workforce development board and lead agencies must work together when negotiating the CCMEP measures in order to ensure that the CCMEP standard does not jeopardize the local area's ability to meet the WIOA youth negotiated measures.