

# Comprehensive Case Management and Employment Program Compilation of Technical Assistance Q&As Activity Hour Requirements

The Office of Workforce Development (OWD) in conjunction with the Offices of Family Assistance (OFA) and Fiscal and Monitoring Services (OFMS), have answered a variety of questions that have been asked through the CCMEPQNA email account. In an effort to share the most recent information and direction given, OWD is making available a transcript of all the questions that have been answered through the CCMEPQNA email account. This will help inform local officials and administrators and better assist in the delivery of Comprehensive Case Management and Employment Program (CCMEP) during the implementation phase.

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**Q: Example: Youth is enrolled in work experience ... say 24 hours per week. Youth completes work experience. What now? What do we place them in? Must the youth be placed in more activities that are at least 20 hours per week?**

A. The comprehensive assessment is used to identify the needs of the participant. The IOP will be the plan used to address the participant's identified needs. If the participant completes the work experience, the case manager will review what else is needed to assist the participant in obtaining unsubsidized employment. Activities such as resume writing, job search, financial literacy, and job readiness skills are potential activities that could be counted toward the 20-hour activity requirement.

**Q: Let's say we have a WIOA OSY that is mandated to participate in CCMEP, and the person is enrolled in a technical school for occupational skill training. We use WIOA funds to pay for her schooling, and she is not TANF eligible. She has a 20 hour per week "work requirement" because of CCMEP, but she meets that through class time, homework time, and travel time. How do we (or the participant) document the completion of that 20 hours? Is there a CCMEP "self-attestation" form, or is there another method to document this?**

A: We do not prescribe the method of recording these activity hours. However, you may consider the creation of a local form that can be filled out and signed weekly (or monthly). You would keep this form in the participant's case file. However you do this, the method should allow program monitors to easily access and review this information.

**Q: Will there be a CRIS-E screen or a PSC code determining whether the customer should or should not be included in the participation rate?**

A: ODJFS plans to modify CRISE to include an indicator for OWF individuals that are required or that volunteer for CCMEP. Work participation reports will be adjusted based on the individual's status as a required individual.

**Q: CCMEP is for 20 hours a week. Do we add an additional assignment for customers required 30 or 35 hours a week for OWF? Are these Core or Non-Core hours? If an ADCU, are both required customers exempt from the participation rate?**

A: Participants shall be assigned to participate in CCMEP for twenty hours per week or the number of hours they would have otherwise been assigned to in OWF, whichever is higher. However, assignments must be made to CCMEP activities based on the outcome of the comprehensive assessment and not in accordance with the limitations described in Chapter 5101:1-3 of the Administrative Code, this would include core or non-core.

**Q: Since the State did not get a waiver of current OWF work requirements and participation rates how will we meet the participation rate if the activities under CCMEP do not meet the definition of core hours? Thus if we do not meet the participation rate, will the Feds be looking at sanctions against the State again?**

A: The State is required to meet the two parent and all-family work participation rates. Regardless of the status of the waiver submitted to the US Department of Health and Human Services (HHS) 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.

**Q: Please explain what this means: How will the lead agency ensure that supportive services provided to program participants not already receiving OWF do not meet the definition of TANF assistance? For individuals who are not OWF participants and are not employed, supporting services extending beyond four months becomes TANF assistance subject to OWF time limits and work participation requirements.**

A: This will be a locally defined process of communication between the lead agency and CDJFS. We will provide the Benefits Matrix to assist in translating supportive services and TANF restrictions.

**Q: It sounds like there will be a lot of tracking of hours for CCMEP- for example, transportation time can count, will there be guidance on how that should be done (as far as determining the amount of time it will take to get from point A to point B-for example – use MapQuest to determine this).**

A: Yes, guidance will be provided on how to track the hours.

**Q: In addition to being placed into CCMEP activities, will their regular classroom school hours qualify to meet the 20 hour requirement? Please explain.**

A: If the regular classroom activities are an integral part of the participant's individual service strategy, as recorded on the IOP, yes they can count towards the participant's 20-hour activities requirement.

**Q: When does the 20 or more hour requirement begin?**

A: Once an IOP is created and signed, the participant must perform activity hours. Please note that OWF customers must have activity hours to continue receiving cash assistance. WIOA youth program participants transitioning into CCMEP begin their activity hours once their IOPs are created and signed.

**Q: Can we count time spent doing the comprehensive assessment, eligibility application, and TABE?**

A: No, these are framework activities (also known as pre-enrollment activities). These items must be completed before the individual becomes a participant, and the IOP is created and signed.

**Q: Do the WIOA youth eligible individuals have to complete the 20 hour CCMEP requirement or is that requirement only for OWF work required individuals?**

A: Once an IOP is created and signed, all CCMEP participants must perform activity hours. Please note that OWF customers must have activity hours to continue receiving cash assistance. WIOA youth program participants transitioning into CCMEP and new participants directly entering the program also begin their activity hours once their IOPs are created and signed. When completing the IOP, the case manager and the participant must identify services and activities that will entail the required 20 hours (e.g., attending postsecondary school will be 10 hours, homework will be 5 hours, comprehensive guidance and counseling will be 2 hours, and travel will be 3 hours). This requirement allows a case manager the ability to see successes and failures in the IOP and gives them the ability to make adjustments as necessary.

**Q: If work participation hours don't count until the IOP is created and signed, and framework activities cannot be counted (CCMEP assessment), how do we get them work participation during framework? And do we run the risk of them filing a complaint for assigning too many hours for doing framework activities and something to satisfy the county's requirement for cash assistance? We understand that traditional WEP has gone by the wayside, but our county JFS agencies are questioning the lag time between framework and the creation of the IOP.**

A: The referral to CCMEP will be assigned as an ALT Work assignment to the participant for either twenty hours or the number of required hours of participation as determined the AG type, whichever is higher in accordance with paragraph (G)(1) of rule 5101:14-1-05. Following completion of the CCMEP assessment, the CDJFS will assign the OWF work activities that correspond with the assigned CCMEP activities in the individual's IOP. The hours completed for the CCMEP assessment and the CCMEP activities assigned in the IOP, will both count towards work participation for the CCMEP participant.

**Q: In reference to County plan 6.7, is good cause required for all 4 categories of participants or just for the OWF required participants? If it is required for all 4 categories, what are the repercussions for not meeting the 20 hour a week requirement – for the participant and for the lead agency? Also do hours spent at mental health, drug and alcohol, etc appointments count towards the 20 hours?**

A: We are creating a common client experience, so this would be for all participants – and while those not receiving OWF benefits may not be sanctioned it may jeopardize other services or CCMEP eligibility.

**Q: How are “non-core” hours determined if a person is CCMEP required?**

A: CCMEP participants are not held to same assignment restrictions of “core” and “non-core” work participation hours. All individuals in CCMEP will be treated the same and assigned to CCMEP activities based on a comprehensive assessment.

**Q: Are non-core hours included at all or do we just go by the total core?**

A: See response above.

**Q: Also, how does the FLSA effect this determination?**

A: CCMEP participants are held to the same FLSA standards for WEP and Community Service activities as non-CCMEP OWF work participants.

Example: When a CCMEP client would have to complete 86 hours core and 43 non-core or in a 2 parent scenario they would otherwise be required to complete 129 core and 22 non-core

**Q: How does the 20 hour requirement impact a secondary in-school Youth during the summer who choose not to participate in a training/work activity?**

A: To participate in CCMEP, the youth will participate in 20 hour of activities per week. These activities may vary, based on the comprehensive assessment and identified needs.

**Q: Given that the core and non-core requirements are being waived in the CCMEP plan. Does this include the time limits for the Job search/Job readiness and Education and training? Or, do the time limit constraints still hold for these activities?**

A: Participation in Job Search/Job Readiness will count towards CCMEP participation without the limits as described in rule 5101:1-3-12.5 of the Administrative Code.

**Q: I have read through the matrix to see what is allowable and not allowable. Are there any time limits for both OWF work-required and non-work required participants to participate in these activities?**

**Has any guidance been issued or will there be guidance issued on how to document the activities? What can be used as documentation and not be used?**

A: There are no set time limits for CCMEP program participants established in rule to participate in these activities hours. Any time limits would be incorporated into a program participant’s Individual Opportunity Plan. All CCMEP participants will be assigned CCMEP activities in their IOP which will indicate the frequency, duration and number of hours to complete each week and/or month.

Your lead agency will determine the process for monitoring and verifying participation in CCMEP activities.

**Q: We place a youth in occupational skills training for 12 or 15 credit hours per week to attend our local community college.**

**The difference in credit hours and 20 hours must be incorporated into the IOP.**

**Is study time allowable to meet the 20 hours? If yes, how much study time per week and what is the maximum hours?**

**Is travel time from home to school and back allowable to meet the 20 hours? If yes, how much travel time per week and what is the maximum hours?**

**If allowable, how do we document study time and travel time?**

**If both study time and travel time are allowable, do the same "rules" apply to both OWF work required individuals and non-OWF work required individuals?**

A: Yes, study time and travel time would be considered allowable activity hours.

When completing the IOP, the case manager and the participant must identify services and activities that will entail the required 20 hours (e.g., attending occupational skills training will be 12 hours, homework or studying will be 10 hours, travel will be 3 hours resulting in 25 activity hours). There is no maximum number of hours per week a participant should dedicate to these activities, but they must be reasonable and able to be documented.

You can create a local template to track and document a participant's activity hours. All documentation should be added to the participant's case file. This applies to both OWF work required individuals and non-OWF work required individuals.

**Q: When dealing with OWF CCMEP clients do we need to follow core and non-core activities?**

A: CCMEP participants are not held to same assignment restrictions of "core" and "non-core" activity hours. Participants shall be assigned to participate in CCMEP for a minimum of twenty hours per week or the number of hours they would have otherwise been assigned to in OWF, whichever is higher. All individuals in CCMEP will be treated the same and assigned to CCMEP activities based on a comprehensive assessment.

**Q: We have a participant who started out as a youth with an enrollment date of December 2013 ... graduated high school June 2015 ... we made her eligible as an adult in January 2016 so we could help with an ITA. She still has a youth activity "open" ...adult mentoring ... but is no longer receiving it. If for some reason we kept her youth activity open then I assume she would be held accountable to the 20 hours CCMEP although she is now funded as an adult. Correct?**

A: The 20 activity hour requirement only applies to CCMEP participants. For WIOA participants who were transitioned into CCMEP, the 20 activity hour requirement goes into effect when their WIOA Individual Service Strategy is replaced by a signed IOP. A transitioned WIOA participant must sign an IOP if the ISS needs to be updated, the lead agency wants to use TANF funds to pay for the participant's services, or if the participant is still being served on December 31, 2016.

**Q: GED classes is an allowable CCMEP activity ...correct?**

A: Yes

**Q: If for CCMEP we determine that an OWF work required participant needs to attend GED classes as part of the IOP, are the GED classes allowable and countable towards the OWF work participation hours in order for the participant to receive her OWF benefits? Yes.**

A: Yes

**Q: If GED classes are allowable for work participation hours, is there a maximum number of hours per week the participant can attend GED? There is a not a limit, but the number hours counted need to be reasonable and based on what is needed. The hours should be tracked on a form your area can create.**

A: There is a not a limit, but the number hours counted need to be reasonable and based on what is needed. The hours should be tracked on a form your area can create.

**Q: Job search and employability skills are an allowable CCMEP activity...correct? Engaging in a job search is an allowable CCMEP activity for counting towards the activity hour requirement.**

A: Engaging in a job search is an allowable CCMEP activity for counting towards the activity hour requirement. Engaging in activities that improve employability skills can also count. Again, this needs to be reflected on the IOP and tracked.

**Q: If for CCMEP we determine that an OWF work required participant needs to participate in job search and employability skills as part of the IOP, are these activities allowable and countable towards the OWF work participation hours in order for the participant to receive her OWF benefits?**

A: You would need to refer to the participant's self-sufficiency contract to determine this.

**Q: If these activities are allowable for work participation hours, is there a maximum number of hours per week the participant can participate in these activities?**

A: There is a not a limit, but the number hours counted need to be reasonable and based on what is needed. The hours should be tracked on a form your area can create.

**Q: Please provide me guidance on what CCMEP activities are allowable for work participation hours to receive OWF cash benefits.**

A: You would need to refer to the participant's self-sufficiency contract to determine this.

**Q: We have a question regarding our CCMEP Youth. I understand the requirement for CCMEP in school youth is to work 20 hours. They are working (getting paid) after school but are not able to get the 20 hours in each week at their employer due to school hours. Are we able to use their schooling (high school) towards some of the hours to meet the requirements?**

A: First, please know that CCMEP participants must participate in activity hours, which can be a wide variety activities intended to meet the participants needs and goals as prescribed in the IOP. Activities such as resume writing, job search, financial literacy, and job readiness skills are potential activities that could also be counted toward the activity requirement. Work hours may count as well.

Second, please know that 20 hours is the minimum activity hours required, and that some CCMEP participants who come through the CDJFS "front door" may be required to perform more than 20 hours per week.

To specifically answer your question, a participant's class and study time could be used to satisfy the activity hours requirement, if doing so satisfies the participant's demonstrated needs and objectives as outlined in the Comprehensive Assessment and IOP. The IOP should clearly explain how attending class and studying assists the participant in meeting his/her employment goals. There is a not a limit, but the number hours counted need to be reasonable and based on what is needed. The hours should be tracked on a form your area can create.

**Q: There is no 20 hour participation hour requirement for WIOA participants in the WIOA law.**

A: The 20-hour activity requirement is part of the common client experience for CCMEP and is not based on funding source. The activity requirement is to enable an individual to become accustomed to managing time as you would when holding a job as well as keeping an individual actively engaged in the CCMEP program.

**Q: Consequently, if we enroll a participant into CCMEP using 100% WIOA funds, is the individual required to adhere to the 20 hour requirement that can be enforced by the State?**

A: Yes. Please note that the 20-hour activity requirement is not an eligibility requirement. WIOA allows a state to add additional guidelines in the provision of services. It is a means of ensuring the participant is being prepared for self-sufficient employment through these activities.

**Q: If the answer is "yes" to the question, what happens if we enroll the participant and do not adhere to the 20 hours "mandated by CCMEP"?**

A: Not adhering to the IOP can and should be used to determine appropriateness of services, similar to any other behavior that does not comply with the expectations outlined in the document.

**Q: Again, I need clarification on any restrictions pertaining to any CCMEP activities that we want to enroll participants into for CCMEP but are not allowable and countable towards OWF work required participation hours to receive OWF benefits...also as these pertain to waivers the State is requesting from the Feds. Please provide an explanation of what we can do and can't do under CCMEP as related to OWF work participation hours.**

A: Please note the following:

- Activity hours can be a wide variety of activities intended to meet the participant's needs and goals as prescribed in the IOP. Activities such as resume writing, job search, financial literacy, and job readiness skills are potential activities that could also be counted toward the activity requirement. The Services Matrix provides a list of all the activities in CCMEP. There will also be a list of the activities in OWCMS from which to choose when developing an IOP in the system. These can help you determine what can and cannot be used for activity hours.
- There is a not a limit on the number of hours counted toward a specific activity. However, the number hours counted need to be reasonable and based on what is needed. The hours should be tracked on a form your area can create.

- Engaging in a job search is an allowable CCMEP activity for counting towards the activity hour requirement. Engaging in activities that improve employability skills can also count. Again, this needs to be reflected on the IOP and tracked.
- If the participant is enrolled in classes, class time, study time and travel time would be considered allowable activity hours.
- Attending GED classes can count toward the activity hours, as long as such hours are reasonable and based on what is needed.

**Q: Follow up query for clarification: If it is believed that the WIOA participant is adequately engaged for 20 hours per week as they are completing activities/utilizing services as specified in the IOP, is it necessary to actually verify that the specific hours of attendance?**

A: For WIOA participants, it is still necessary to document activity hours, including actual attendance. Based on your local policy, you may have the school verify attendance or you may have the student track his/her hours on a form he/she will sign. For OWF recipients required to participate in CCMEP, it is necessary to document activity hours and verify attendance with the school or worksite.

**Q: Example: For OWF recipients, we typically send them with attendance forms to be completed by the school to verify daily attendance. For WIOA, could we consider successful completion of a course requiring 20 or more hours per week of class time adequate documentation of engagement**

A: No. Assuming that the participant was engaged in 20 hours of class every week just because he/she successfully completed a course is not acceptable. It is possible in some situations for students to skip sessions and still complete a course.

**Q: When assignments are selected for CCMEP individuals, are time limits for assignments such as Job Search still the same?**

A: There is no limitation to the number of Job Search/Job Readiness hours that count towards CCMEP participation. Assignments shall be made to CCMEP activities based on the outcome of the comprehensive assessment and not in accordance with the limitations described in chapter 5101:1-3 of the Administrative Code.