

Comprehensive Case Management and Employment Program Compilation of Technical Assistance Q&As Eligibility

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.

Q: When a minor parent is NOT the head of household, is that minor parent eligible for CCMEP under TANF as s/he is not a work eligible individual?

A: Yes. They can be eligible as a volunteer or as a WIOA youth if they meet WIOA eligibility requirements.

Q: Can a 17 year old child living in a household receiving OWF be eligible for CCMEP under TANF? The child is not a work eligible individual.

A: Yes, as a volunteer.

Q: Are the children of Non-citizen or persons ineligible for OWF due to immigration status automatically deemed ineligible as they are receiving cash assistance under a non-work eligible parent? The cash benefit is issued to the child however s/he is not head of household or a work eligible individual.

A: Under WIOA, non-citizens are eligible for services if they are legally eligible to work. Individuals who are not legally eligible to work in the US are not eligible for the program.

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: Will current WIOA participants currently being served by our youth providers who are TANF eligible continue to be funded under WIOA or will they be moved under the lead agency and be served with TANF funds?

A: Local workforce development areas are encouraged to review all their current WIOA youth program participants. If a participant has completed services or if the participant is not actively

engaged in the WIOA youth program, this youth should be exited from the WIOA program and follow-up services will begin. These participants will not be transferred to the CCMEP program. Local areas must provide follow-up services to these exited participants using the second year WIOA youth allocation (PY 2015 carry-in funds). WIOA youth participants, ages 16-24, who are currently enrolled in WIOA and receiving services, will be transitioned to CCMEP and the lead agency. The lead agency will review the transitioned participant's WIOA individual service strategy and the progress of service delivery. If the ISS needs to be updated, the lead agency will complete the CCMEP individual opportunity plan with the changes to the services. If no changes to the ISS are needed, the participant will continue to receive services via the ISS. However, by December 31, 2016, if the WIOA transitioned participant is still enrolled in services, an IOP will be developed and signed by the participant. If the lead agency wishes to explore TANF funding for a WIOA transitioned youth, the youth will complete the TANF eligibility portion of the WIOA youth program eligibility form. If the WIOA transitioned youth is also TANF eligible, the lead agency and youth must complete and sign an IOP.

Q: I keep reading in the CCMEP plan that it is requiring Low-Income youth with Barriers who are WIOA eligible to participate in CCMEP. What happens when you have an Out of School youth that is eligible for WIOA because of a barrier (parenting) that is not Low Income? If our county is participating in CCMEP, will we not be allowed to serve this individual with WIOA Youth funds? Or do all WIOA eligible youth get served with CCMEP funds so we can still serve these individuals.

A: Yes, you can still serve these individuals. All WIOA-eligible youth ages 16-24 regardless of income must be enrolled in CCMEP. They are a participant in CCMEP when they receive their first service.

Q: Please help in clarifying the intent of the following rule. CCMEP 5101:14-1-02 (D) states the following:

“What are the requirements of the lead agency?”

(6) Determining eligibility for WIOA and TANF. In order to maximize the funding opportunities, each voluntary or mandatory program participant shall complete a JFS 03002 "WIOA Youth Eligibility Application" (3/2016). The lead agency shall use the JFS 03002 to determine if the individual is eligible to receive funding through TANF and/or WIOA.”

The rule above outlines nine (9) responsibilities of the Lead Agency. If the Lead Agency is the CDJFS, does # 6 above mean that the JFS will determine eligibility for both TANF and WIOA or does it also mean that the JFS can contract out eligibility determination for both TANF and WIOA to another agency?

A: The responsibility to determine eligibility for WIOA and TANF in this portion of the rule pertains to an eligibility determination after this individual has been referred to CCMEP. The purpose of determining eligibility for both funding streams is to access both streams and have additional resources available to serve the individual. So, if an OWF or PRC participant is referred to CCMEP, eligibility for WIOA youth will be completed. If a WIOA youth participant is referred to CCMEP, eligibility for TANF will be completed. It is the responsibility of the lead agency to ensure that dual eligibility determinations have been made. This can be done directly through the CDJFS as the lead agency or by an entity that is completing this determination on behalf of the CDJFS (e.g., via contracts with providers).

Q: On the WIOA youth eligibility form JFS-03002- where it asks the TANF questions- there are yes and no responses but nothing to advise one on how to determine if the customer is TANF eligible. For example, if the person checks that they are under 200% of the FPL and they check “no” to not having anyone under 18 in the household –it doesn’t indicate if the person is eligible or not. Will there be further explanation of this?

A: The individual’s household income must be under 200 percent of the poverty level. Furthermore, there must be a minor in the household, as well as the opportunity to vote and no repayment of TANF funds. Further guidance and instructions will be given.

Q: If you enter CCMEP as a required OWF participant and then you lose OWF eligibility (for whatever reason) – you stay eligible under TANF funding as long as you remain under the 200% FPL and a semi-annual review is required to determine if the participant can still be served with TANF funding. I know we will have regular contact with the participants – would we just set a say 6 month time period from the time the participant goes off OWF assistance and collect the last 30 days income and determine if the participant is under the 200% FPL and then continue to do this every 6 months as long as the participant is still participating in CCMEP?

A: This sounds like you are on the right track. Maybe just expand the process itself.

Q: My question is: Our Youth Provider currently has approximately 70 kids enrolled into the WIOA Youth Program that fall between the ages of 16-24. Am I to assume that all of the kids will be converted to the CCMEP Program simply because they are WIOA enrolled or only the ones that have been enrolled whom is considered to have a barrier to employment? Couldn’t some of these kids been enrolled for other reasons that “barrier to employment”???

A: Per federal law, to be eligible for WIOA, all in-school and out-of-school youth must have at least one documented barrier to employment prior to enrollment. The list of barriers used for determining in-school eligibility differs some from the list used to determine out-of-school eligibility. In short, a youth cannot receive WIOA Youth-funded services without having a barrier to employment.

Q: Once a person turns 24 – are they no longer eligible for the CCMEP program on their 24th birthday, or can they remain eligible through the age of 24?

A: The age requirement for CCMEP is ages 16-24 at the time of participation. If an individual becomes a CCMEP participant before his or her 25th birthday, it is possible to remain in the program for years beyond that.

Q: If the potential CCMEP recipient is 24 at the time of assessment/enrollment, may that individual remain in the program after the client turns 25, or is the individual to exit the program at that point?

A: If the person becomes a participant in CCMEP before his or her 25th birthday, he or she may remain in the program beyond their 25th birthday - as long as they still meet the other eligibility requirements. (Please note that under WIOA, a person is considered a participant when he or she has been determined eligible and has received one staff-assisted service. TANF eligibility for CCMEP may change if the participant’s circumstances change.)

Q: 5101:14-1-02 uses the language "Each low-income individual who is an adult, in-school youth, or out-of-school youth" in describing mandated CCMEP participants. I'm confused about the "adult" part of that. Does this mean that if one of our service providers in using WIOA Adult funds to serve a 22 year old, low-income (but not receiving OWF) with a barrier to employment for an ITA, they are required to participate in CCMEP?

A: No. The use of the term "low income adult" comes from the temporary law implementing this program. It was not the intent of the law to include the WIOA adult population in CCMEP; it was designed only for the WIOA youth program. As a result, rule 5101:14-1-01 (S) defines "low income adult" to be an in-school or out-of-school youth. Therefore, the passage you quoted to does not refer to individuals in the WIOA Adult program.

Q: Thank you for your response. However, I am not trying to clarify who helps the client "fill out" the JFS 03002 WIOA application. I am trying to determine who determines eligibility for WIOA. Is it the Lead Agency? If the Lead Agency is CDJFS, does the Lead Agency have the option to contract out eligibility determination for WIOA to another entity?

A: If an individual is seeking WIOA-funded youth services, the local OhioMeansJob center (or the youth program provider procured by the local workforce board) will determine eligibility for WIOA-funded, youth services. Then, the individual is referred to the CCMEP lead agency. For those CCMEP participants who are OWF work-eligible, there will be a determination of WIOA eligibility (by completion of the JFS 03002) once referred to CCMEP. WIOA eligibility determination in this situation will be done by the lead agency or by the procured youth program provider depending on how the county has outlined this process in the CCMEP county plan.

Q: I have a question regarding a CCMEP possible participant. We have a client that is currently 24 years old and pregnant with her first child (due in August). If we start her in this program now would she be able to continue after the postpartum period which she will be turning 25 in October? I know that in training it was discussed that if they start when they are 24 they can continue in the program if they turn 25, but will this include the pregnant women?

A: Yes, as a 24 year old OWF (pregnant) work eligible individual she would be able to start in CCMEP beginning July 1st and continue in CCMEP until she meets one of the exiting criteria. If she is determined eligible for WIOA-funded services and receives one staff-assisted service (which enrolls her in WIOA-funded services), she could remain in CCMEP even if her TANF eligibility status changes at some point.

Q: Can an 18-24 year old Out of School, low-income youth who does not have a child (is not pregnant) be eligible for TANF?

A: An individual referred to CCMEP from WIOA shall be determined to receive TANF-funded services when that individual:

- (1) has (or has applied for a) Social Security number;
- (2) is a US citizen, non-citizen national or qualified alien;
- (3) does not owe any of the cost of fraudulent TANF assistance;
- (4) has been afforded the opportunity to vote, if appropriate;

(5) has a gross household income in the previous 30-day period of less than 200% of poverty level;

(6) is a minor child or is the parent of a minor child.

Under the scenario you provided, this individual would not be eligible for TANF.

Q: One question we still have about CCMEP concerns eligibility for volunteers. If they are not WIOA youth and not OWF, would they have to complete a PRC application to determine TANF eligibility or would they just complete the CCMEP application? Or both?

A: To volunteer to participate in CCMEP, an individual must be an OWF participant who has not been determined to be work-eligible or is receiving benefits and services from the PRC program within 30 days of the date that PRC benefits are received. The individual would not have to complete any additional applications pertaining to OWF or TANF eligibility to participate in CCMEP; the application used to determine OWF or PRC eligibility would suffice. Once the individual volunteers for CCMEP and is referred to the lead agency, the JFS 03002, WIOA Youth Program Eligibility Form would be completed to determine if the individual is also eligible for WIOA youth program funding.

Q: Follow up question: I was given a list of all active WIOA Youth participants who are transitioning to CCMEP. One of the participants was born in February 1991, thus was 25 years old as of 7/1/16. I believe that this person would not become involved in CCMEP. Please advise if I am incorrect.

A: Because the individual was determined eligible and was enrolled and provided WIOA youth services prior to the age of 25 years, the individual should be transitioned to CCMEP to continue to receive services. Please note that if the customer was not determined eligible for TANF prior to his 25th birthday, so he is not eligible for TANF-funded services.

Q: TANF uses an appraisal and self-sufficiency contract and CCMEP the assessment and IOP. Do PA staff still do the appraisal and self-sufficiency contract and then in turn CCMEP staff do the assessment and IOP ... or can the assessment and IOP completely replace the appraisal and self-sufficiency contract and be totally removed from the process?

A: The PA staff will still complete the appraisal and self-sufficiency contract for OWF work-eligible participants in order for the individual to receive their cash benefits. The initial self-sufficiency contract will include the referral to and participation in CCMEP. Once the OWF work eligible is referred to CCMEP, he or she will receive a comprehensive assessment (which then replaces the appraisal) and an IOP (which then replaces the self-sufficiency contract).

Q: Once eligible for WIOA a participant remains eligible for WIOA ...do not have to re-determine eligibility. TANF requires periodic redetermination of eligibility. Please explain and clarify.

A: Unlike WIOA, TANF eligibility is fluid and requires a six month review. This review will include a review of current income (and the household must remain within 200% of poverty). If the individual remains TANF eligible, TANF funding for services may still be used. If the individual is no longer TANF eligible, only WIOA funding may be used to provide services to this individual until such time or circumstances change whereby the individual's income goes below the 200% poverty threshold and is eligible for TANF again.

Q: WIOA looks at the last 6 months income x 2 to annualize the income and then compared to the income guidelines for eligibility. TANF looks at the last 30 days and compares it to a monthly income standard. Please explain and clarify how this is to be handled.

A: One way to be WIOA eligible is to be considered a low-income individual. In the review of the definition of low-income criteria, the local areas review the family's income and situation (whether or not they have been on public assistance or SNAP) in the past six months. For TANF eligibility, there is only a 30 day income look back. Therefore, the individual's household must have been within 200% of the poverty limit in the past 30 days.

Q: TANF is based on 200% of poverty level when the new guidelines come out in January. WIOA uses poverty and 70% LLSIL guidelines which the State issues guidance in April or May on the new guidelines. Please explain when we are to use the new income guidelines for both TANF and WIOA.

A: These new guidelines have been published and are contained on the OWD policy page at: http://jfs.ohio.gov/owd/WorkforceProf/policy_info.stm

Q: Please explain how we are to approach the food stamp population since they are considered to be low-income per WIOA and CCMEP states all WIOA low income youth are required to be in CCMEP. Are food stamp recipients considered to be required or volunteers

A: Individuals receiving SNAP may become involved in CCMEP either as WIOA in-school or out-of-school youth or as an OWF work eligible. SNAP recipients, in of themselves, are not required or voluntary participants of CCMEP.

Q: Can you define work eligible individual?

A: From OAC 5101:1-1-01 (EE):

"Work eligible individual" as defined in 45 CFR 261.2 (02/08) means the following:

(1) An adult (or minor child head-of-household) receiving assistance under TANF or a separate state program or a non-recipient parent living with a child receiving such assistance unless the parent is:

- (a) A minor parent and not the head-of-household;
- (b) A non-citizen who is ineligible to receive assistance due to his or her immigration status; or
- (c) At state option on a case-by-case basis, a recipient of supplemental security income (SSI) benefits or aid to the aged, blind or disabled in the territories.

(2) The term also excludes:

- (a) A parent providing care for a disabled family member living in the home, provided that there is medical documentation to support the need for the parent to remain in the home to care for the disabled family member;
- (b) At state option on a case-by-case basis, a parent who is a recipient of social security disability insurance (SSDI) benefits; and
- (c) An individual in a family receiving maintenance-of-effort (MOE) funded assistance under an approved tribal TANF program, unless the state includes the tribal family in calculating work participation rates, as permitted under 45 CFR 261.25 (06/06).

Q: We are reviewing an application for CCMEP WIOA/TANF eligibility. The household is an 18 year old, who recently graduated, her mother, and 2 younger siblings. When we are looking at her TANF

eligibility, since she is 18 and no longer in school, are we looking at just the youth as a family of one or are we looking at the entire household that includes her mother and 2 siblings who are minors?

A: An 18 year old who recently graduated from secondary school is no longer a minor child as defined in paragraph (Q) of rule 5101:1-1-01 and therefore would not be eligible for TANF as defined in paragraph (D)(6)(b) of rule 5101:14-1-02 of the Administrative Code or for OWF.

Q: Miami County has a policy question regarding CCMEP. For an OWF work eligible mandatory participant who has just had a baby, we would normally exempt them from a work activity for 6 weeks for natural birth and 8 weeks for C-section. I have not heard of any such exemption for CCMEP activities. Can you please clarify how we should handle this situation? Is there any exemption for CCMEP activities for a woman who has recently had a baby?

A: If the individual meets the definition of a work-eligible individual and would otherwise have an hourly assignment in OWF, (e.g., the individual claims to be disabled but does not receive SSI or SSDI) then yes, the individual must be referred to CCMEP. If the individual meets the definition of work-eligible individual but does not have an hourly requirement (e.g., a domestic violence victim or the parent of a child under 12 months for whom the county agency has granted a temporary exemption from work), then the individual would not be referred to CCMEP.

Q: During the VC it was discussed that the days of one parent doing all of the hours would no longer exist as of 7/1/2016. However, the hours map states that if one parent 16-24 will complete all of the required work activity hours for the assistance group...Does this mean a two parent HH can still elect to have only one parent participate BUT that one parent would HAVE to be the CCMEP individual?

A: Not necessarily. Depending on the situation, in an AG with two work-eligible individuals (WEI), only one WEI may be assigned to complete the total number of required hours of the AG. The one assigned WEI may be either the OWF WEI or the CCMEP individual.

• **EX 1: You have an AG that consists of Mom (22), Dad (26), and common child (5). Dad doesn't want to do the hours. Does this mean mom would be required to complete the 35 hours per week through CCMEP and dad doesn't get an OWF assignment?**

Yes. The mom is completing the total number of required hours of the AG.

• **EX 2: You have an AG that consists of Mom (22), Dad (22) and common child (1). Mom wants to stay at home with the child. Can this happen if Dad agrees to complete the entire 35 hours per week in CCMEP and mom doesn't get an assignment?**

Yes. The dad is completing the total number of required hours of the AG.

• **EX 3: You have an AG that consists of Mom (22), Dad (26), and common child (5). Mom is assigned 20 hours per week in CCMEP. Dad is assigned the remaining 15 hours per week. Do we assign Dad core or non-core hours?**

It is recommended that the dad is assigned the remaining 15 hours per week in a core activity.

Q: I have a question about CCMEP just so I'm clearly understanding. Let's say someone applies for OWF and we determine them eligible. They provide everything we need and we complete the SSC requiring them to attend the CCMEP assessment for the following Monday. We complete AECCM in CRISE when we approve the OWF and then the individual does not show for the assessment. I understand we are going to propose a three-tier sanction for the failure. My question is (1) can we wait to see if the individual shows to the assessment prior to approving the case and just deny the application if they don't show? I think I read that we couldn't delay the authorization just for the IOP completion?

A: No, OWF eligibility is determined independently from the CCMEP assessment and, as you stated, a referral for the CCMEP assessment should in no way delay or interfere with the OWF authorization. As an alternative, the CDJFS may choose to complete a referral to CCMEP only once OWF is authorized so long as the referral is completed within 7-days from the date of authorization.

Q: After receiving video conference materials for 6-15-16 video conference on CCMEP, we have another question. The Office of Family Assistance CCMEP FAQs question 18. Can SNAP only recipients who are required for work registration be referred to CCMEP to meet their SNAP E & T requirements? The answer is No, which is understandable. CCMEP does not meet the SNAP E & T requirements. However, the answer goes on to indicate that "Under no circumstance may a county agency use its authority under 5101:4 to require a SNAP participant to volunteer or otherwise participate in CCMEP." So, does that mean that a SNAP E & T required individual cannot volunteer for CCMEP and still meet their SNAP E & T requirements separately? The answer was misleading as once someone is required, then they aren't a volunteer. So, the agency could not require someone to volunteer.

A: A SNAP E&T participant, who is eligible to volunteer to participate in CCMEP due to the fact that they are a PRC/OWF recipient or a WIOA youth applicant, may complete SNAP E&T and CCMEP work participation activities separately. (I want to emphasize that a SNAP only person cannot volunteer for CCMEP)

Q: The rule above outlines nine (9) responsibilities of the Lead Agency. If the Lead Agency is the CDJFS, does # 6 above mean that the JFS will determine eligibility for both TANF and WIOA or does it also mean that the JFS can contract out eligibility determination for both TANF and WIOA to another agency?

A: If the customer comes through the "CDJFS front door," eligibility for CCMEP TANF-funded services will first be determined by the CDJFS. Then, the customer will be referred to CCMEP. At that point, the CCMEP lead agency or the agency contracted by CCMEP lead agency will work with the customer to fill out JFS 03002 "WIOA Youth Eligibility Application." However, if the customer comes through the "WIOA front door", the local workforce agency or the local contracted youth services provider will fill out JFS 03002 "WIOA Youth Eligibility Application." As part of this application, please note there is a section that will determine general TANF eligibility for those individuals entering through the "WIOA front door."

Q: We have a LEAPer coming in on June 30th. OAC5101:1-23-50(S) states failures to comply with IOP are described in rule which leads us to believe that we are to complete an IOP which replaced the SSC/SSP with the LEAP client rather than complete the LEAP paperwork? Please clarify if we are or are

not to have a LEAP client under age 19 complete an IOP or if we should be using the LEAP forms and paperwork like we used to.

A: The purpose of OAC 5101:1-23-50 (s) is to advise that participation in CCMEP (mandatory or voluntarily) does not exempt a LEAP required individual from the LEAP program. The Individual Opportunity Plan (IOP) does not take the place of the LEAP paperwork. You should continue using the LEAP paperwork for all LEAP required participants. Also, not all LEAP participants will be in CCMEP. Only those LEAP participants that are mandatory CCMEP participants (OWF work eligible individuals) or voluntarily CCMEP participants (OWF non-work eligible individuals) will be referred to CCMEP to sign an IOP to continue completing the LEAP program. Only LEAP participants who are considered a minor head of household (married and is pregnant or has a child) are considered work eligible individuals.

Q: What is the fastest way to pull a count for 16 – 24 years old OWF recipients who are work required? Will there be a report in the future?

A: ODJFS will be providing a report to counties of existing 16-24 year OWF recipients who work eligible and will need to be transitioned into CCMEP between July 1 – December 31, 2016.

Q: Child is 16 and getting ADC- she is LEAP required but will also be CCMEP. When she doesn't do what she is required what sanction does it follow- LEAP \$62 sanction or the tiered sanctions?

A: A 16-year old LEAP participant is not a work eligible individual as defined in OAC rule 5101:1-3-12, therefore is not required to participate in CCMEP. OAC rule 5101:1-23-50(R) addresses SSC requirements for minor heads of households in LEAP. The LEAP participant would be subject to LEAP program requirements and a LEAP sanction for failure to meet the program requirements.

Q: In the CCAO webinar yesterday, it was mentioned that there are 30,000 participants identified for CCMEP. Can you please advise how this number was obtained and what is the per county number.

A: The figure of 30,000 participants is based on the number of work-required OWF participants and the number of WIOA Youth customers ages 16-24 in Ohio at the time those reports were extracted from the reporting systems. This figure does not include voluntary participants. We do not have figures by county yet.

Q: Can you please define who/what are work eligible leaps individuals according to the rules?

A: "Work eligible individual" as defined in 45 CFR 261.2 (02/08) means the following:
(1) An adult (or minor child head-of-household) receiving assistance under TANF or a separate state program or a non-recipient parent living with a child receiving such assistance unless the parent is:
(a) A minor parent and not the head-of-household;
(b) A non-citizen who is ineligible to receive assistance due to his or her immigration status; or
(c) At state option on a case-by-case basis, a recipient of supplemental security income (SSI) benefits or aid to the aged, blind or disabled in the territories.

Who is eligible for LEAP? According to 5101:1-23-50 Ohio works first: learning, earning and parenting program. With the exception of teens who have obtained a high school diploma or the equivalent, teen custodial parents, and pregnant teens under the age of nineteen who are applying for or in receipt of Ohio works first (OWF), are potentially subject to the LEAP program requirements. These requirements apply to teens who live on their own and to teens who live with their parents, other caretaker relatives, legal guardians or legal custodians. The requirements apply to both the teen custodial mother and the teen custodial father of the child and to all pregnant teens.

Q: In the leap program what constitutes WEI 18 year olds?

A: 18 year old LEAP participants who are considered a minor head of household (married and is pregnant or has a child) are considered work eligible individuals.

Q: Clarification or examples of when or how 16/17 year old would be both CCMEP and LEAP?

A: Only those LEAP participants that are mandatory CCMEP participants (OWF work eligible individuals) or voluntarily CCMEP participants (OWF non-work eligible individuals) will be referred to CCMEP to sign an IOP to continue completing the LEAP program. Only LEAP participants who are considered a minor head of household (married and is pregnant or has a child) are considered work eligible individuals. CCMEP (mandatory or voluntarily) does not exempt a LEAP required individual from the LEAP program. The Individual Opportunity Plan (IOP) does not take the place of the LEAP paperwork. You should continue using the LEAP paperwork for all LEAP required participants.

Q: Is a WIOA Youth eligibility determination needed prior to enrollment in CCMEP?

A: There are two doors that can be used to enter CCMEP. If the individual is entering through the CDJFS door, he/she must be OWF work eligible, an OWF non-work eligible volunteer, or a PRC volunteer. If the individual is entering through the WIOA front door, then he/she must be determined WIOA Youth eligible before enrolling in the program.

Q: I reviewed an application today from a young man who is 19 years old living with his mom who is receiving metro, food assistance and Medicaid. He graduated from high school. He is not working. On the WIOA side, the worker noted that his barrier is a court order and provides documentation of a civil protection order listing him as the respondent. Is that sufficient for court involved? The youth is looking for tuition assistance to get his CDL.

A: The definition of offender is “an adult or juvenile who is or has been subject to any stage of the criminal justice process, and for whom services under WIOA may be beneficial; or who requires assistance in overcoming artificial barriers to employment resulting from a record of arrest or conviction.” Merely receiving a civil protection order does not appear to meet the definition of being subject to the criminal justice process. You may wish to explore whether the events that led to the civil protection order might have involved the criminal justice process or if there were any other events that involved the individual meet the definition.

Q: We have a 23 year old youth who is currently in post-secondary school. She is a single parent. She would be a CCMEP volunteer. Does not qualify as an In-school WIOA youth (23 yrs old). During the

webinar yesterday it was mentioned to send any CCMEP TANF-eligible customers who do not show as WIOA eligible in OWCMS to the help desk to get them enrolled into OWCMS. How can they be eligible for CCMEP TANF but not WIOA Youth?

A: You are correct with the example you provided. A 23 year old who is currently in post-secondary school, does not meet the eligibility criteria for a WIOA in-school youth due to her age and does meet the criteria for a WIOA out-of-school youth due to enrollment in post-secondary education. Each program which provides funding for CCMEP has its own separate eligibility criteria. This eligibility criteria must be met in order to use the funding. There will be circumstances in which an individual will be eligible for one program but not the other.

Q: Can you please clarify what the CCMEP TANF eligibility criteria is? (How is it different from WIOA youth eligibility?) Does CCMEP TANF take into account In-School / Out-of-School status as part of their eligibility criteria?

A: 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:

-CDJFS Door -Each work-required (work-eligible) individual shall participate in CCMEP as a condition of participating in Ohio Works First (OWF).

-WIOA Door -Each low-income individual who is an adult, in-school youth (ages 14-21), 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 4 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.

Per rule 5101:14-1-02 (6)(b), an individual referred to CCMEP from WIOA shall be determined eligible to receive TANF services funded by TANF when that individual:

- Has (or has applied for) a social security number;
- Is a U.S. citizen or non-citizen national or qualified alien;
- Does not owe any of the cost of fraudulent TANF assistance paid to the individual;
- Has been afforded the opportunity to vote;
- Has a gross household income in the previous 30 day period of less than 200% of the federal poverty level; and
- Is a minor child or is the parent of a minor child.

As you can see, this eligibility criteria is very different from WIOA eligibility. This eligibility criteria also does not take into consideration in-school or out-of-school status as part of their

eligibility criteria. For those individuals who are WIOA youth program eligible, TANF eligibility may also be determined by completion of the JFS 03002 which includes the above stated criteria.

Q: Is there any other way to determine CCMEP TANF eligibility (application?) without determining WIOA Youth eligibility other than OWF? For instance, a stand-alone PRC application?

A: For those individuals coming into CCMEP through the CDJFS door, eligibility for TANF funding will be automatic as those coming through this door will either be OWF work-eligible individuals or will be those who are not work-eligible or PRC individuals. The CDJFS will utilize their current applications to determine eligibility for receipt of those benefits. No additional applications will be used for the purposes of CCMEP and TANF funding.

For those individuals coming through the WIOA door, TANF eligibility will only be determined if the individual is WIOA eligible and being referred to CCMEP. If an individual is not WIOA youth program eligible, there will be no determination of TANF eligibility. This is due to the fact that there are only certain ways an individual comes into the program, either as a required participant (OWF work-eligible or WIOA youth program eligible) or a volunteer (OWF non work-eligible or receipt of PRC).

Q: Second, if the FAMILY of a participant is receiving cash support but the youth is not, can that youth be served under the TANF funds?

A: The youth may receive TANF funding for CCMEP activities if said youth is determined to be TANF eligible. Please refer to the TANF eligibility questions on pages 2-3 of JFS 03002: WIOA Youth and Young Adult Program Eligibility Application. (Please note that the 200% Federal Poverty Guidelines listed in the chart on page 3 are outdated. You will need to use the current numbers for those.)

Q: Does the requirement to serve 25% in-school and 75% out of school youth apply to TANF funds?

A: No.

Q: There are some eligibility questions in our county regarding the use of WIOA funds. Specifically, WIOA eligibility is 100% FPL. The state intake makes individuals eligible at 200%. We are enrolling TANF youth at 200% and providing services at OMJ. We are not sure how to proceed with non TANF youth as WIOA is our only funding source. Can you advise?

A: The low income criteria for WIOA youth program eligibility has not changed since CCMEP went into effect. Please bear in mind that the eligibility criteria for in-school and out-of-school youth differs, and the role of low income status in determining eligibility for these two types of participants varies as well. (Ninety-five percent of WIOA in-school youth must be low income, while low income status is part of only two barriers for out-of-school youth.)

For individuals who enter CCMEP through the "WIOA front door" and are determined WIOA eligible, JFS Form 03002 does have a section that is used to determine eligibility for TANF-funded services. This section is different than the section used to determine eligibility for WIOA-funded services.

Q: Can we include WIOA Adults as volunteers?

A: No. Only OWF non-work eligible individuals and PRC individuals may volunteer for CCMEP.

Q: At a training I attended on June 29 I was given the following definition for ISY in regards to Post Secondary School " a youth who is committed to attending a school and has signed up for classes."

Many youth register for classes in April and May of their Senior year for their Freshman year of college and because many students who enroll for classes don't actually show, many colleges don't consider a student enrolled until they have attended the first day of class.

For a youth who is a high school graduate and is planning on pursuing Post-Secondary, where do you want us to draw the line in determining ISY or OSY.

A: For the purposes of determining eligibility for WIOA-funded services, when the high school graduate has enrolled in post-secondary education classes, the youth is an in-school youth.

Q: A TANF SYEP participant, who is 16 and in school, is determined eligible for CCMEP under both TANF and WIOA funding. During his high participation and up until he turns 18, TANF funds are used to provide CCMEP services. Upon his high school graduation, he would no longer be TANF eligible and we would have to use WIOA funding in order to provide additional or follow-up services. At that time, would we have to go back to the initial CCMEP application from 2 years prior to determine his WIOA funding source and serve him as an ISY or since the CCMEP application was completed so long ago, would he complete a new application? Keep in mind, WIOA has not been used to provide any services during his 2 year participation in CCMEP.

Under your scenario, you clearly state that the CCMEP participant did not use any WIOA-funded services for the two years he was in school. At the point that the individual graduated high school, and assuming that he did not already enroll in post-secondary classes, you would have to determine his eligibility for WIOA-funded services as an out-of-school youth.

Under your scenario, please note that there is a risk of CCMEP services being unexpectedly interrupted if the participant suddenly loses TANF eligibility without having received a WIOA-funded service. This could also provide a challenge regarding how to fund mandated, follow-up services if TANF eligibility is lost and the participant cannot be enrolled in WIOA.

A: I have a client who is not a citizen of the U.S.A., but has her credentials to work here. Will this affect her eligibility for CCMEP? She comes to us as a youth.

A: If the individual has the authority to work in the U.S., and meets the other general eligibility requirements for WIOA-funded youth services, then you can enroll her in CCMEP and she can receive WIOA-funded services.

Pursuant to OAC 5101:14-1-02 (D)(6)(b)(ii), to receive TANF-funded services, the client must be non-citizen national or qualified alien as defined in OAC rule 5101:1-2-30.

It states as follows:

(1) A United States (U.S.) citizen or non-citizen national:

The "United States" is defined as the fifty states, the District of Columbia, Puerto Rico, Guam, Northern Mariana Islands, and the American Virgin Islands. In addition, non-citizen nationals from American Samoa or Swain's Island are considered U.S. citizens for purposes of the OWF and DFA programs.

(2) Qualified alien:

(a) An alien who at the time of application or at the time of receipt of OWF or DFA is:

(i) An alien lawfully admitted for permanent residence under the Immigration and Nationality Act (INA) (1952);

(ii) An alien granted asylum under the INA;

(iii) A refugee who is admitted to the U.S. under section 207 of the INA, 8 U.S.C. 1157 (05/2005);

(iv) An Afghan or Iraqi alien admitted to the U.S. who was granted a special immigrant visa (SIV) under section 101(a)(27) of the INA, 8 U.S.C. 1101 (12/2008);

(v) An alien paroled into the U.S. under section 212 of the INA for a period of at least one year;

(vi) An alien whose deportation is being withheld under section 243 of the INA;

(vii) An alien granted conditional entry pursuant to section 203 of the INA as in effect prior to April 1, 1980;

(viii) An alien who is a Cuban or Haitian entrant pursuant to 45 CFR 401 (1982);

(ix) An Amerasian admitted pursuant to section 584 of Public Law (P.L.) 100-200 (12/1987), as amended by P.L. 100-461 (10/1988);

(x) An alien or an alien's child battered or subjected to extreme cruelty in the U.S. by a spouse or a parent or by a member of the spouse's or parent's family. This shall not apply to an alien during any period which the individual responsible for the abuse is residing in the same residence. Verification and documentation procedures for this status are defined in exhibit B of attachment 5 of the U.S. Department of Justice interim guidance dated November 17, 1997 (62 FR 61344); and

(xi) A victim of a severe form of trafficking in persons certified under the Victims of Trafficking and Violence Protection Act of 2000, Pub. L. No. 106-386, 114 Stat. 1464 (2000).

(a) A family member of a victim of a severe form of trafficking in persons who holds a visa, for family members authorized by the Trafficking Victims Protection Reauthorization Act of 2003, Pub. L. 108-193, 117 Stat. 2875 (2003).

(b) An alien child pursuant to the William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008, 22 U.S.C. 7105.

(b) Residents of the U.S. prior to August 22, 1996:

A qualified alien who entered the U.S. prior to August 22, 1996 and continuously resided in the U.S. until attaining qualified alien status shall continue to meet the citizenship requirements for OWF and DFA.

(c) Residents of the U.S. on or after August 22, 1996:

A qualified alien who enters the U.S. on or after August 22, 1996 does not meet the citizenship requirement for OWF and DFA with the following exceptions:

(i) Refugee's as set forth in paragraph (A)(2)(a)(iii) of this rule, eligibility is limited to five years from the date of entry into the U.S.;

(ii) Victims of severe forms of trafficking who are potentially eligible for benefits and services to the same extent as an alien admitted to the U.S. as a refugee in accordance with rules 5101:1-2-30.1 and 5101:1-2-30.3 of the Administrative Code;

(iii) Indefinite detainees or lifers after being convicted of a crime that triggers a final order of removal, may have a status making them potentially eligible in accordance with rule 5101:1-2-30.2 of the Administrative Code;

- (iv) An alien granted asylum under the INA. Eligibility is limited to five years from the date asylum was granted;
- (v) An Afghan or Iraqi alien admitted to the U.S. who was granted a special immigrant visa (SIV) under section 101(a)(27) of the INA, 8 U.S.C. 1101 (12/2008). Eligibility is limited to five years from the date of entry into the U.S.;
- (vi) An alien whose deportation is being withheld under section 243 of the INA. Eligibility is limited to five years from the date of entry into the U.S.;
- (vii) An alien who is a Cuban or Haitian entrant pursuant to 45 CFR. 401 (1982). Eligibility is limited to five years from the date the status as a Cuban or Haitian entrant is granted;
- (viii) An Amerasian admitted pursuant to section 584 of Public Law (P.L.) 100-202 (12/1987), as amended by P.L. 100-461 (10/1988). Eligibility is limited to five years from the date the individual was admitted into the U.S. as an Amerasian immigrant;
- (ix) Aliens lawfully admitted into the U.S. for permanent residence under the INA and have worked forty qualifying quarters of coverage under Title II of the Social Security Act or can be credited with quarters that are creditable for any period beginning after December 31, 1996 and did not receive any federal means-tested public benefit during any quarter.
 - (a) Qualifying quarter shall be credited as follows:
 - (i) All quarters of coverage worked by a natural or adoptive parent if the quarters were worked before the date the alien attains age eighteen; and
 - (ii) All quarters worked by a spouse of such alien during their marriage if the alien remains married to such spouse or such spouse is deceased.
 - (iii) A qualifying quarter does not include any quarter after December 31, 1996, in which the individual worked and also received a federal means-tested public benefit.
 - (x) Veterans and active duty service personnel lawfully residing in Ohio and are:
 - (a) A veteran with an honorable discharge and not on account of alienage; or
 - (b) On active duty (other than active duty for training) in the U.S. armed forces as defined in section 5303A(d) of Title 38, United States Code (U.S.C.)(2007).
 - (c) The surviving spouse of a deceased veteran or individual on active duty, provided the spouse has not remarried and the marriage fulfills the requirements of 38 U.S.C. 1304 (2004) or the unmarried dependent child(ren) of an individual as defined in paragraph (A)(2)(x) of this rule.
 - (d) Filipino war veterans who fought in World War II as described in 38 U.S.C. 107 (2004).

Q: In the Post-Secondary Education portion of the Comprehensive Assessment, what is considered enrolled? Accepted into a program but has not started classes or accepted and has started classes?

A: For the purposes of determining eligibility for CCMEP, when the high school graduate has enrolled in post-secondary education classes, the youth is an in-school youth.

Q: For example: A client has been accepted into an adult career program but does not officially start classes until 9/26. When completing the assessment, do I select yes or no for the enrollment question?

A: If the person is registered for classes, you would check "yes."

Q: If a potential CCMEP participant is attending school would we also be able to assign to the CCMEP program for the additional services?

A: If entering through the CDJFS front door, the eligibility criteria for CCMEP and OWF is no different for individuals attending school. If entering through the WIOA front door, the individual must be eligible as an in-school youth for WIOA-funded services to enroll in CCMEP

Q: Are applicants who have received a soft service PRC in the last 30 days eligible to volunteer for CCMEP or only those who received hard services? For example car repairs (hard service) , Summer Youth Employment (Soft Service).

A: Individuals who have received any PRC service in the last 30 days are eligible to volunteer for CCMEP. If the example services you have provided happened in the last 30 days, they would be eligible to volunteer.

Q: Is an OWF recipient who is enrolled in post-secondary education between the ages of 18 & 24 exempt for CCMEP?

A: An OWF recipient between the ages of 18-24 who is a work eligible individual and enrolled in post-secondary education would not be exempt from CCMEP. All OWF recipients ages 16-24 who are work eligible individuals as defined in OAC 5101:1-3-12 would be mandatory participants in CCMEP.

Q: If an individual between the ages of 16-24 is in receipt of OWF and is work required (not Leap) and has been deemed by a medical professional as “unable to work” because of pregnancy or temporary illness/injury would they still be required for CCMEP?

A: See FAQs 2 and 3 under section 2 of the OWF Guide to CCMEP.

An individual who is “unemployable” due to a medical issue...they are still considered work required. Ordinarily we would enroll them in an alternative work assignment and monitor their progress closely. It’s my understanding that if they meet the age requirement they also would be required for CCMEP.

A: See FAQs 2 and 3 under section 2 of the OWF Guide to CCMEP.

Q: How can counties serve volunteers in the Comprehensive Case Management and Employment Program (CCMEP)?

A: Individuals who are least 16 but not more than 24 years of age may volunteer to participate in CCMEP in accordance with the following:

- Each OWF recipient 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 within 30 days of the date that PRC benefits are received.

Any person not able to volunteer through one of these two options could voluntarily complete a WIOA Youth application and if eligible, the individual would be referred to CCMEP.

With regard to those individuals participating in PRC the statute authorizing CCMEP indicates that the individual must be “receiving benefits and services under the Prevention, Retention, and Contingency Program....” Given that PRC benefits are designed to meet crisis situations and emergent needs, it is difficult to say when someone is actively “receiving” the benefit, therefore ODJFS chose to define the period of receipt to extend 30 days after receipt. Ultimately, it is up to the county agency to determine when an individual is “in receipt” of PRC when determining if a referral to the Lead Agency is appropriate.

Counties should also note that eligibility for the WIOA youth program is broad and can be used as another avenue for recruiting and registering youth for CCMEP as required participants. Eligibility for the WIOA youth program is described in detail in rule at 5101:10-3-01 WIOA Youth and Young Adult Program: Eligibility Requirements.

Q: Where can I find Attachment A, *Allowable Source Documentation for WIOA Program Eligibility*?

A: The attachment can be found at:
<http://jfs.ohio.gov/owd/WorkforceProf/Docs/SourceDocumentationChart.pdf>

Q: Is there a checklist that would help determine TANF eligible customers under CCMEP?

A: For those individuals coming into CCMEP through the CDJFS door, eligibility for TANF funding will be automatic as those coming through this door will either be OWF work-eligible individuals or will be those who are not work-eligible or PRC individuals. The CDJFS will utilize their current applications to determine eligibility for receipt of those benefits.

Per rule 5101:14-1-02 (6)(b), an individual referred to CCMEP from WIOA shall be determined eligible to receive TANF services funded by TANF when that individual:

- Has (or has applied for) a social security number;
- Is a U.S. citizen or non-citizen national or qualified alien;
- Does not owe any of the cost of fraudulent TANF assistance paid to the individual;
- Has been afforded the opportunity to vote;
- Has a gross household income in the previous 30 day period of less than 200% of the federal poverty level;
- and
- Is a minor child or is the parent of a minor child.

Q: I work for Jackson Co, we have a case with a two parent household (ADCI), father is 18 yrs old and in his senior year in high school and mother is 20 and on SSI. He is coming up as leap and he also falls under CCMEP. Do we still enter him in leap assignment and issue bonuses and refer him to CCMEP coordinator? Do we just add CCMEP referral and complete IOP to his leap agreement or do we have him complete SSC/SSP? Thank you in advance for some clarification.

A: Only those LEAP participants that are mandatory CCMEP participants (OWF work eligible individuals) or voluntarily CCMEP participants (OWF non-work eligible individuals) will be referred to CCMEP to sign an IOP and continue completing the LEAP program. Only LEAP participants who are considered a minor head of household (married and is pregnant or has a child) are considered work eligible individuals. CCMEP (mandatory or voluntarily) does not exempt a LEAP required individual from the LEAP program. The Individual Opportunity Plan (IOP) does not take the place of the LEAP paperwork. You should continue using the LEAP paperwork for all LEAP required participants.

Q: A youth recently exited from the WIOA youth program and is in her 12 month follow up period. She has been determined in need of additional training (STNA). Can we un-exit this case in OWCMS and provide an ITA to cover the costs of training?

A: If you are within 90 days from the last actual end date for all of her services, you can go into OWCMS and re-open the case file. However, if you are past 90 dates on all of her actual end dates, then you would have to re-determine eligibility and enroll her in CCMEP.

Q: We have a young girl who is transitioning into CCMEP from TANF Summer Youth. Although she finished school at a local private, Christian high school, she has a large debt (unpaid tuition) and they will not give her, her diploma until it is paid. Her family is low income and they are unable to pay the debt, so she is working to pay it off, get her diploma, and go on to college to study elementary education. My question is: She technically isn't a drop out, but she isn't in high school and doesn't have her diploma. How do we categorize her? I suppose it's feasible that she'll never pay off the debt and never get her diploma.....

A: If she is completely done with her classes, and she did not receive her diploma because she did not meet all of the requirements of graduation; she is not currently enrolled in any other school; and, she meets the proper age and barrier criteria, then you may classify her an out-of-school youth.

Please note that this is a different situation than an individual who has completed all of her graduation requirements early and is just waiting for the school to present a diploma. In this kind scenario, we would consider the individual to be in-school.

Q: Thank you so much for your response. I do have one more question pertaining to this. If the CCMEP customer is a parent of a minor child does the minor child have to be living in the home with the customer in order for the customer to be TANF eligible? Or does just being a parent of a minor child in general meet the TANF eligibility criteria when the other qualifications are met?

A: As long as they are the parent of a minor child and meet the other guidelines, the child does not have to be living in the home for them to be TANF eligible.

Q: Those who may participate in CCMEP, based on the rule 5101:14-1-02 B2.2b are “individual receiving benefits and services from the PRC program who volunteers for CCMEP within 30 days of the date that PRC benefits are received” AND since the TANF Summer Job Program is a PRC program, a summer youth participant who wants to volunteer for CCMEP meets eligibility to be enrolled within 30 days after PRC benefits are issued. The 30 days after PRC benefits are issues would be 30 days after they receive their last paycheck since it’s paid through TANF funds. Is this correct?

A: Yes

Q: Even though the rule 5101:14-1-02 6.vi. states, “Is a minor child or is the parent of a minor child”, if a TANF summer jobs youth wants to volunteer for CCMEP within the 30 days after PRC benefits were issued and were determined eligible for TANF Summer Job Program (PRC) not because they were a minor but because there was a minor in the household, this youth would be eligible for enrollment UNTIL the 6 months review takes place, correct?

A: When the 6 month review takes place they would no longer be eligible due to not being a minor child or is a parent of a minor child. Yes. However, if the individual is enrolled in WIOA-funded service, they could remain in CCMEP.

Q: Also, does the 6 month review take place from date of enrollment into CCMEP?

A: It takes place from a date during the initial assessment.

Q: I have a client who is open cash assistance and is CCMEP required. She completes all assessments and the IOP. After she has done this, she decides that she no longer wants to receive cash assistance. She is still required to participate in CCMEP, correct?

A: If she has signed her IOP, the expectation is that she would continue to participate in CCMEP anyway. Of course, in this scenario, cash assistance could not be withheld due to the lack of participation in required activities and she can’t be forced to do so.

Q: Also, if she wants the cash to close because she realizes that she cannot get her 20 hr/wk in or just decides that she doesn’t want to participate anymore, she is still required to participate with CCMEP, correct?

A: Please note the answer, above.

Q: I have a client who is 20 years old and has rec’d 30 months of cash assistance. She has signed the 36 month acknowledgment form and is aware that she will have to apply for a hardship in a few months if she stays on cash assistance. Is the hardship process the same for CCMEP client’s as it is for OWF participants?

A: If the individual loses her OWF eligibility, she may remain in CCMEP if determined WIOA-eligible and she receives at least one WIOA-funded service. Any CCMEP individual who loses his/her TANF eligibility and has not locked in their eligibility with a WIOA-funded service, WIOA eligibility must be recalculated. If the customer is not WIOA eligible at that time the he/she will need to be exited from CCMEP, and alternative programs should be looked at.