

# Comprehensive Case Management and Employment Program Compilation of Technical Assistance Q&As Miscellaneous Topics

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.

## CFIS

**We have a CCMEP TANF customer enrolled into Tutoring for ABLE/GED classes. Service dates are 8/2016 – 6/2017. We need to issue a voucher for her GED testing fees but in CFIS it does not give you monthly budget amounts; shows as pooled service. Please advise how we are to issue vouchers to the ABLE/GED provider for test fees for this service.**

A: Please be advised that pooled services you cannot enter amounts for.

## Complaint Process

**Q: WIOA Complaint Right – State Form  
What is the programmatic complaint rights?**

A: You can find the WIOA complaint rights information in the “WIOA Governance” section of the Office of Workforce Development’s “State Policy and Guidance Information” page at:  
[http://jfs.ohio.gov/owd/WorkforceProf/policy\\_info.stm](http://jfs.ohio.gov/owd/WorkforceProf/policy_info.stm)

**Q: Is it correct that TANF individuals will still have state hearing rights and we should follow current state hearing procedures?**

A: Yes

**Q: The above process is the same for both OWF CCMEP and WIOA CCMEP participants.**

Yes. However, 5101:6-10-01 does not apply to an individual who receives an Ohio Works First (OWF) sanction termination notice.

**Q: The Complaint Rights Form should still be issued at enrollment and if so is that just to participants enrolling into CCMEP through WIOA or should it be also issued to OWF CCMEP participants.**

The WIOA complaints rights form should be used by participants enrolling through either WIOA or OWF.

**Q: The JFS 04065 “Prior Notice of Right to a State Hearing” is indeed the form to be issued as a notice of adverse action.**

Yes.

### **Data Entry**

**Q: When an OWF client has been assigned to CCMEP, we will need to enter the assignment on WPAS. In the ACTIVITY section on the WPAS screen, are there going to be CCMEP activities that we will enter. What goes on WPAS when you are working with an OWF CCMEP client?**

A: Enter the assignment to CCMEP initially as ALTWRK and then update to the corresponding OWF work activities after communicating with the Lead Agency about what the actual assigned/completed activities were. Each CCMEP activity will have one, or more, corresponding OWF activities as indicated in the Service Matrix. For each assigned CCME activity, the CDJFS will choose the most appropriate OWF activity and enter it into WPAS.

**Q: What code do we put on WPAS initially when OWF has been approved and referral to CCMEP is made?**

A: The CDJFS would assign the CCMEP participant to an Alternate Work assignment once the referral is initiated for CCMEP services. Following the CCMEP assessment and development of the IOP, the Lead Agency will provide the CDJFS with the assigned CCMEP activities and the CDJFS will assign the corresponding OWF activities based on the benefit matrix.

**Q: Good afternoon, I am reading through some material recently obtained from a CCMEP video conference and have a quick question. The FAQs page indicates that there will be a PSC code to accurately reflect CCMEP participants. I do not see the code when scrolling through the available codes. Is there one there that I am missing??**

A: ODJFS plans to modify CRIS-E 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. Hence, you are not seeing the PSC code yet for CCMEP participation.

**Q: If we assign a client to CCMEP and they are attending post-secondary school would we need to enter both the CCMEP assignment and ETWA on the WPAS screens or just the CCMEP since the post-secondary school is in the service matrix as an activity?**

A: See FAQ 6 under Section four of OWF Guide to CCMEP

**Q: I am trying to find out how to list the CCMEP work requirement assignment on WPAS? I have a note to list it as ALTWRK, however if that is entered the client will fail the 518 report.**

A: See Section 2 of OWF Guide to CCMEP.

**Q: Am I understanding correctly that anyone who is OWF work eligible and assigned to CCMEP should have their assignment in CRIS-E listed as an alt. work assignment?**

A: See Section 2 of OWF Guide to CCMEP.

**Q: When a person has an AECCM screen showing a Y for a referral when do they go off the 518? AECCM is dated 8/10/16 will they be off the August 518? Is there a cut off day for each month that after which they will not be removed from the 518 for that month?**

A: Please refer to the attached desk aid on completing AECCM in CRIS-E regarding what values to input into AECCM.

When 'R' is entered on AECCM, the individual will appear on the CCMEP 518 report (BIC 1094 report) for the same month that 'R' was entered. Therefore, if 'R' is entered on 8/10, then that individual will show up on the CCMEP 518 report for August. The cutoff date is the last day of the month in order for the individual to appear on the CCMEP 518 for that month.

**Q: How are the OWF Core & Non-Core Hours for Work Readiness being logged in CFIS for OWF Benefits? Are the CDJFS Case Workers Required to do this? Please advise.**

A: CRISE continues to be the system of record for tracking core and non-core hours of participation for OWF work eligible individuals. If this information must also be logged into CFIS, then that question should go to ODJFS Fiscal.

### **Exiting**

**Q: What are the reasons for closure of CCMEP?**

A: There are three reasons:

- The customer enrolls in post-secondary education, obtains unsubsidized employment, or enlists in the military.
- The customer is awarded Social Security Disability Insurance (SSDI) or Supplemental Security Income (SSI).
- The participant has failed to utilize CCMEP services on multiple occasions without good cause.

These are reasons you can exit a customer. But, if appropriate, you may continue to service the customer.

**Q: It states that the lead agency shall end all CCMEP services when a participant is no longer eligible for TANF and WIOA. I can see TANF as we are required to redetermine TANF eligibility semi-annually. However, once determined WIOA eligible the participant remains WIOA eligible ...we do not redetermine WIOA eligibility during the course of program participation. Please explain.**

A: Once a customer is enrolled in WIOA, they are always enrolled. Enrollment occurs when the customer is determined eligible and receives a service. Determining eligibility alone does not ensure this. So if a customer has been funded exclusively with TANF dollars and loses TANF

eligibility, and if the customer was not currently enrolled on WIOA, then no WIOA funds would be available. At that point all services should end.

**Q: I was wondering if you can send me the website for determining the "high poverty area" for the WIOA youth living in that area. I think at training we were told it was a result of census information that is used to determine that.**

A: The link to the data is: [https://development.ohio.gov/reports/reports\\_am\\_com\\_survey.htm](https://development.ohio.gov/reports/reports_am_com_survey.htm)

**Q: I read the exit process. For WIOA, once we determine to exit a person, we end the services in OWCMS and the exit date is the date we end services. Does the same hold true for CCMEP and exiting in OWCMS?**

A: Yes, it will work the same way. The only difference is that the Notice of Adverse Action will need to be sent within 30 days.

**Q: 5101:14-1-06 (B) (2) describes a requirement to send a notice to the participant "No later than thirty days from ending all services" (we interpret that this excludes follow-up services). Do you have a sample letter that can be shared?**

A: Sample letters have been developed and will become available.

**Q: What if the client states they do not want to participate in CCMEP while under a sanction? At that point a sanction gets entered and their benefits stop. Wouldn't it be similar to having them participate in CCMEP as a volunteer or are there further repercussions for individuals who fail CCMEP while not receiving OWF?**

A: For existing CCMEP participants: If a work-eligible is in CCMEP and then gets sanctioned, they would remain in CCMEP (if/until they met an exit reason). There are three reasons a participant may exit CCMEP.

- (1) The program participant has successfully entered post-secondary education, military enlistment or deployment, and/or unsubsidized employment and no longer needs CCMEP services;
- (2) The program participant has been awarded social security disability insurance (SSDI) or supplemental security income (SSI) by the social security administration and has made application for services with opportunities for Ohioans with disabilities; or
- (3) The program participant has failed to utilize CCMEP services on multiple occasions without good cause and the lead agency has made reasonable efforts to provide services and make contact with the program participant.

In this case, simply stating they do not want to participate in CCMEP would not be grounds for an exit. In order to exit the participant from CCMEP, they must fail to utilize the CCMEP Services on multiple occasions without good cause.

**Q: We have some CCMEP clients that will be reaching 30 days with no participation. Does the Notice of Adverse Action, letting them know that CCMEP will end in 90 days, get sent automatically from the State or is this a notice that the County has to create and issue?**

A: Please use the current OFA document until a new version is released. If there are CCMEP participants who have not followed through with services and activities for over 30 days, the lead agency and/or youth provider may make the decision to close the case. However, one should be mindful of the determination of good cause, including good cause documentation. Did the participant have a good reason for skipping an activity? Did the lead agency/youth provider look into reasons for missing activities? Did the lead agency do anything to alleviate the reasons? Has the CCMEP case manager communicated with the cash assistance case manager, as missing activities and the resulting exit may result in sanctions for an OWF work eligible participant.

Note that if a client hits the 90 day mark of no participation prior to September 29th, their exit date will be prior to the existence of CCMEP and therefore, would be just a WIOA youth not requiring the notice of Adverse Action.

### **Follow-up Services**

**Q: If youth are in CCMEP either WIOA or TANF – will we be able to spend money for needed services when the youth is in follow-up? I have heard conflicting answers to this.**

A: Both TANF and WIOA funds are available during follow-up services. However, one must be aware if the individual is eligible for the funding. WIOA funding is static, meaning once a person is eligible and receives a WIOA-funded service prior to exit, the individual will be eligible to receive a WIOA-funded service during follow-up. TANF funding is fluid, meaning that TANF eligibility may change based upon the situation. The lead agency will have to re-examine TANF eligibility every six months. If an individual is no longer TANF eligible, TANF funding is no longer available for follow-up services.

**Q: Also, to determine what RMS hits we can take during follow-up services – do we go by the income/enrollment at the time of exit?**

- **Under 200% - can still take TANF hits**
- **Over 200% - general funds hits**
- **Solely WIOA – WIOA hits**

A:

- Under 200% and still eligible for TANF (i.e., has a minor child, lives in Ohio, etc.) - can still take TANF hits
- Over 200% - general funds hits. Or, WIOA can fund follow-up for individuals that had been enrolled as WIOA Youth during CCMEP participation or co-enrolled as WIOA Adult.
- Solely WIOA – WIOA hits

**Q: What constitutes the CCMEP TANF AG? IF household contains mom and dad each 40 yrs old plus 21 yr old and 17 yr old, who is included in the CCMEP TANF AG? Is the 21 yr old eligible for CCMEP TANF. Or is the 21 yr old not included in the AG due to age? To qualify, would the 21 yr old need to have a child of their own? Then would the AG consist only of the 21 yr old and their child? What rule defines the CCMEP TANF AG?**

A: The household is based upon who the individuals includes and self-attests resides in the home.

**Q: Also, if the client is volunteer via 200%, it looks like we would need to re-determine eligibility every six months? Do they have a reporting requirement that if they gain employment before the six month redetermination, they are to report, then are no longer eligible if over the 200%?**

A: CCMEP volunteers are OWF participants who have not been determined to be work eligible individuals, and individuals receiving benefits and services from the PRC program within the last 30 days of the date PRC benefits are received.

The determination of TANF eligibility using the 200% is only limited to WIOA youth for whom TANF eligibility is being explored. It should be noted that for the 200% population, the lead agency will have to re-determine TANF eligibility every six months. If CCMEP participant is aware that their income is higher than the 200% poverty level, they must report this to the lead agency.

### Governance

**Q: Under WIOA, counties are recognized as part of an Area ... allocations, performance, policies, etc. ... not individual counties. Under CCMEP, counties are recognized individually ... not as an Area. Please explain.**

A: The local workforce development board will need to work closely with the lead agencies in all of the counties within the local area, to ensure all allocations, performance measures, etc. for the local area are coordinated with the individual counties.

### Incentives

**Q: Since CCMEP participants can't participate in OWIP, under CCMEP can we implement a similar program using TANF and WIOA funds to pay participants a cash incentive for obtaining employment and retaining employment? If yes, must a policy be developed and approved by the WDB?**

A: It does not appear that incentives are permitted for the purpose you have suggested. Per section 681.640 of the WIOA final regulations, incentive payments funded through WIOA to youth participants are permitted for recognition and achievement directly tied to training activities and work experiences. The local board must have written policies and procedures in place governing the award of incentives and must ensure that such incentive payments are:

- Tied to the goals of the specific program
- Outlined in writing before the commencement of the program that may provide incentive payments;
- Align with the local board's organizational policies; and
- Accord with the requirements contained in 2 CFR part 200 (May not include entertainment such as movie or sporting event tickets or gift cards to movie theaters or other venues whose sole purpose is entertainment. Must be internal controls to safeguard cash and gift cards. Etc.)

Since the final regulations only speak to incentives as it relates to the provision of training activities and work experiences, we do not believe that incentives could be given for obtaining employment and retaining employment.

**Q: We have an additional question. WIOA allows for incentive payments or gift cards for youth meeting certain milestones. Does TANF/OWF CCMEP allow for such incentive?**

A: TANF would allow for incentive payments if it meets a TANF purpose, is not TANF assistance and it is used to reward or encourage particular behaviors or outcomes and NOT be used to meet ongoing basic needs or participation-related expenses. Please see Family Assistance Letter #103 & #103-Att (attached) for guidance on the use of TANF funds for the purchase of gift cards.

**Q: Are monetary incentives-gas/gift cards, cash payments an allowable expense under CCMEP TANF funding?**

A: TANF would allow for incentive payments if it meets a TANF purpose, is not TANF assistance and it is used to reward or encourage particular behaviors or outcomes and NOT be used to meet ongoing basic needs or participation-related expenses. Please see Family Assistance Letter #103 & #103-Att (attached) for guidance on the use of TANF funds for the purchase of gift cards.

**Q: Are incentives allowed to be given to youth and/or contracted providers? If yes, would we be required to track how the incentive is used (EX: What was actually purchased with a gift card)?**

A: Incentives are allowable if funded by WIOA funds. They must be identified on the IOP and be in accordance to your local area policy.

**Q: Currently, WIOA Youth provides various small monetary incentives for youth such as for getting their HS diploma/GED, getting their driver's license, etc. Are these allowable under TANF and if so do we need to specify in our CCMEP Plan? If not, I'm assuming we should have some kind of written policy for these incentives.**

**Attendance to services in good standing, as determined by Employment Specialist- \$20 monthly gas voucher or bus pass**

**Perfect attendance to scheduled life skills classes- \$25 check**

**Work Keys- \$15 check**

**TABE- \$10 check**

**High School Equivalency- \$50 check**

**First Aid/CPR certification- \$25 check**

**OSHA certification- \$25 check**

**Other certification, as determined appropriate by Employment Specialist- \$25 check**

**Learner's permit- \$25 check**

**Driver's license- \$50 check**

**Job start (not applicable to paid work experience)- \$50 check**

**Professional certificate- \$50 check**

**Enrollment into college- \$50 check**

A: TANF would allow for incentive payments if used to reward or encourage particular behaviors or outcomes and NOT be used to meet ongoing basic needs or participation-related expenses.

**Q: In our plans for Mahoning and Columbiana counties, we stated we will use our existing Youth policies for CCMEP. Those policies include a policy on providing bonuses to Youth participants. Our question is can we pay for those bonuses out of our CCMEP TANF funds?**

A: TANF would allow for incentive payments if it meets a TANF purpose, is not TANF assistance and it is used to reward or encourage particular behaviors or outcomes and NOT be used to meet ongoing basic needs or participation-related expenses.

### Misc

**Q: We have several staff members, service providers and Franklin County staff members who are new to the OWCMS system. The WDBCO would like to know if there is any way that we can request on-site OWCMS training?**

A: Very soon, we will be posting basic OWCMS training online. This basic training should help your staff until the new OWCMS screens become available in October.

After October, we will also be re-evaluating what future hands-on training might be offered.

**Q: We were wondering if we could get a county contact list with the names and phone numbers of the lead agency for each county for country transfer purposes.**

A: Updated versions of this list can be found at: <http://jfs.ohio.gov/owd/CCMEP/docs/County-Lead-Agency-List.stm>

**Q: If there is a place that we should be looking for these answers that location would be appreciated as well.**

Q: We plan to post a CCMEPQNA on the Website soon.

**Q: Training sessions are needed for local staff where we can have Q and A with the State on what we can do and can't do under CCMEP ... particularly with OWF work required participants and participation hours for their benefits ... Q and A with other counties ... sharing of ideas ... open, round-table discussions... nuts and bolts ... in person training ...not webinars.**

A: The next phase of our training plan will include a regional approach and more of a workshop style on how to create the best possible delivery system. During this training it will have a more intimate approach and you will have the ability to ask questions along the way and create opportunities to customize and tweak your current flow. I think this training will go a long way to meeting many of the needs you have requested. We will keep you up to date as we get closer to launching this training later in the fall.

### Outreach

**Q: Wanted to see if program outreach is an allowable cost under CCMEP?**

A: Program outreach continues to be a WIOA-allowable activity under CCMEP

**Q: Under CCMEP there is WIOA and TANF, so is this allowable under both portions of CCMEP?**

A: The Uniform Guidance at 2 CFR Part 200 applies to all federal grants (WIOA as well as TANF) unless a federal agency published exceptions specific to their grants. 2 CFR 200.421(d)(2) permits all federal programs to pay for public relations – the costs of communicating with the public on specific activities of a Federal award, see below.

Dept of Health and Human Services published their exceptions to the Uniform Guidance at 45 CFR Part 75 and I am not seeing any exceptions in that section that would cause TANF to differ from the Uniform Guidance when it comes to public relations being allowable under federal programs. A list of HHS and other agency exceptions to the Uniform Guidance is available at: <https://cfo.gov/wp-content/uploads/2014/12/Agency-Exceptions.pdf>, please let me know if you see any that would alter the allowability of public relations as defined below:

Uniform Guidance §200.421 Advertising and public relations

(c) The term “public relations” includes community relations and means those activities dedicated to maintaining the image of the non-Federal entity or maintaining or promoting understanding and favorable relations with the community or public at large or any segment of the public.

(d) The only allowable public relations costs are:

- (1) Costs specifically required by the Federal award;
- (2) Costs of communicating with the public and press pertaining to specific activities or accomplishments which result from performance of the Federal award (these costs are considered necessary as part of the outreach effort for the Federal award); or
- (3) Costs of conducting general liaison with news media and government public relations officers, to the extent that such activities are limited to communication and liaison necessary to keep the public informed on matters of public concern, such as notices of funding

**One of our staff members has brought to my attention a potential issue between the FAET required and CCMEP required clients. We use the 50-1 office of OWCMS and our FAET service provider uses 43-1 office. When a FAET client is entered into OWCMS by the service provider and then we go to enter information on the CCMEP side, we are getting an error that will not allow us to run eligibility on that client and it states that there is already an open case. On the bottom of the OWCMS screen, the box states “CRIS-E inbound” under the OWCMS worker. We aren’t sure what that means. Along with that issue, when we enroll a client in OWCMS on the CCMEP side and then the FAET service provider enrolls the client at a later date- we go back in to look at case info in CFIS- we get an error stating “no case ID”.**

A: Follow these steps:

1. Search for your Youth first, see if an existing case is already in WCMS
2. Once you find an existing case or enter a new one, on the Basic Intake screen / Program Data tab, set the CCMEP field to YES, then SAVE your input
3. Upon SAVE this should have the Youth Case setup properly
  - a. Since the Partner staff added their criteria and CCMEP criteria has been added, then
  - b. The Program Involvement section on the bottom of the Basic Intake / General tab will display WIOA Youth

- i. WIOA Youth is what is needed to display for WIOA Youth and CCMEP to work on the Services screen properly
- 4. Now you are good to go to the Services screen and enter the Services
  - i. Enter for WIOA Youth
  - ii. Enter for CCMEP TANF (look for the services that have words "CCMEP TANF" after them)
- 5. The CRIS-E Inbound for WCMS Case Worker just means that this case was created by the CRISE file that we received (not manually built)
- 6. CFIS - currently these 2 systems are not fully connected to each other. Meaning someone will have to build a small seeker case record in CFIS for you to be able to find and then pull over the same seeker case from WCMS with all the services

### **Program Structure**

#### **Q: What is the relationship between CCMEP and WIOA?**

A: CCMEP is the employment and training program that is funded by TANF and WIOA youth monies. Because all the WIOA youth program funds will be dedicated to CCMEP, CCMEP is the only program available to serve WIOA eligible in-school and out-of-school youth. In other words, CCMEP is the employment and training program through which WIOA youth eligible participants are served.

Because CCMEP is the only program available to serve WIOA youth, the fundamental components of CCMEP are based upon WIOA laws and regulations. The comprehensive assessment will be utilized in lieu of the objective assessment. The CCMEP individual opportunity plan (IOP) serves as the WIOA individual service strategy. The 14 WIOA program elements/services must be made available to all CCMEP participants. All program elements (aka, services) funded by WIOA must be provided through youth program providers procured through the local workforce development board. Additionally, all WIOA requirements attached to the WIOA funding (75% of funds serves out-of-school youth, 20% of funds for work experience, etc.) are also found within the CCMEP program.

In regards to the performance measures, the CCMEP primary performance measures are based upon the WIOA youth program performance measures. The CCMEP primary performance measures will be negotiated at the county level, and these measures will include both WIOA and TANF-funded participants. The WIOA performance measures will be negotiated at the local workforce development area level and will include the performance of participants who were only funded with WIOA dollars.

So- in a nutshell, CCMEP is the same program as the WIOA youth program, except that CCMEP also serves another set of eligible participants and additional funding (TANF). CCMEP is the integration of the WIOA youth and TANF programs to serve a certain set of participants (ages 16-24) who have barriers to employment.

### **Procurement of Services**

**Q: Our RFP was issued for WIOA Youth Services only with no any mention of CCMEP to be effective 7.1.2016. Now that we have selected a vendor, may we negotiate CCMEP services into our contract with that vendor? While the services may be similar for both programs, CCMEP is funded with TANF**

**and WIOA Youth funds. With both TANF and WIOA Youth funding, the amount of the contract increases greatly.**

A: If a local board already procured WIOA Youth services, it is permissible to add CCMEP provisions to the contract because CCMEP is built around the same basic WIOA framework anyway (performance measures, 14 program elements, assessment, service strategies, etc.) It is true that addition of TANF funds increases the selected WIOA provider's total revenue, but Ohio Administrative Code section 5101:9-4-07 paragraph (A)(2) -- available at <http://codes.ohio.gov/oac/5101%3A9-4-07> -- says that federally funded sub-grants to a sub-recipient do NOT need to be procured. It is only the requirement in WIOA section 123 that mandates competitive procurement of WIOA Youth services, but this provision does not apply to the TANF dollars. Therefore, a lead agency could sub-award the TANF funds to any sub-recipient it chooses without competitive procurement by the local board or anyone else, and if the lead agency happens to decide to grant the TANF funds to the selected WIOA provider (or to any other sub-recipient), that still does not invalidate the fair competition for the WIOA funds that the local board properly completed.

**Q: Our Area procured the WIOA youth elements last spring. WIOA contracts are in place for WIOA youth elements using WIOA funds. The contracts end 6/30/16 but can be renewed as of 7/1/16. Is this procurement still valid and can it carry into CCMEP effective July 1?**

A: This procurement is still valid and it can be used for delivery of WIOA funded CCMEP services.

**Q: If yes, can we just incorporate the TANF funds portion of CCMEP into the WIOA funds contract for our provider to provide the youth elements in PY 16 as they have been doing for PY 15?**

A: You will have to review the contract language to see if it contains language that provides the flexibility to modify contracts to add new contract language. If the contract does have this language, the local area should ensure the youth provider has the capacity to implement the requested portions of CCMEP.

**Q: Or must the youth elements under CCMEP be procured all over again for PY 16 in spite of the fact that they were just procured?**

A: This may not be necessary based upon the language of your contract with the current WIOA youth program provider.

**Q: Does TANF CCMEP allow payment for a management fee?**

A: Yes, both TANF and WIOA follow the cost principles in the Uniform Guidance at 2 CFR part 200. Management fees of this nature are not prohibited for federal programs to pay (WIOA or TANF) but you should have the provider break down and explain what this fee covers so you can ensure the cost is actual, necessary, and reasonable as required by the cost principles. The cost of the fee has to be supported. It gets hard to justify this fee if participant totals vary widely or if several months go by with no participants in service yet we're still paying a flat fee for no service. So yes, this sort of fee is generally allowable but be sure you can defend it as necessary and reasonable during an audit.

**Q: If TANF CCMEP does allow it would we take a percentage of WIOA and TANF participants and use that percentage to split the fee?**

A: Yes, you could use participant counts to split the fee between WIOA and TANF. This makes good sense, is compliant with the Uniform Guidance, and could be defended in an audit. ODJFS is using our participant counts to split some CCMEP costs between TANF and WIOA.

**Q: How would we input that in OWCMS?**

A: Only the services like training or work experience – basically the 14 Youth program elements - need to be entered in OWCMS. This management fee is not to be tracked in OWCMS. When the voucher is entered in CFIS to pay this vendor, lines could be added to the voucher to pay this fee (one line for TANF share and one line for WIOA share). These costs would not be tied to any obligations in OWCMS – they are just additional provider costs on top of the actual participant’s direct costs.

**Q: What are the permissible level of profits allowed under WIOA and/or TANF funds associated with the CCMEP? Furthermore, I assume it is permissible for the amount of profit proposed to be negotiated.**

The answer on whether profit is allowable hinges on whether the selected provider is deemed to be a contractor or sub-recipient. The Uniform Guidance provides criteria to help you make that determination in 2 CFR Part 200.330 available at [http://www.ecfr.gov/cgi-bin/text-idx?SID=221805eb190a0c7bd797e6c2297d6731&mc=true&node=se2.1.200\\_1330&rgn=div8](http://www.ecfr.gov/cgi-bin/text-idx?SID=221805eb190a0c7bd797e6c2297d6731&mc=true&node=se2.1.200_1330&rgn=div8)

If the provider is a contractor...

Per the Uniform Guidance at 2 CFR Part 200.323 (available at: [http://www.ecfr.gov/cgi-bin/text-idx?SID=221805eb190a0c7bd797e6c2297d6731&mc=true&node=se2.1.200\\_1323&rgn=div8](http://www.ecfr.gov/cgi-bin/text-idx?SID=221805eb190a0c7bd797e6c2297d6731&mc=true&node=se2.1.200_1323&rgn=div8) ), federal programs may pay profit to a for-profit contractor. The amount of profit must be negotiated as a separate element of the price for each contract in which there is no price competition and in all cases where cost analysis is performed. To establish a fair and reasonable profit, consideration must be given to the complexity of the work to be performed, the risk borne by the contractor, the contractor's investment, the amount of subcontracting, the quality of its record of past performance, and industry profit rates in the surrounding geographical area for similar work. This applies to both TANF- and WIOA-funded providers.

There is no permissible level of profit – it just depends. We did recently have a finding from DOL for one of our Flood NEG providers that was for-profit and earned profit in excess of 12 percent, but again, it just depends on their level of risk. In their TA, DOL recommended that areas should tie the profit payment to some goal the provider must reach such as a profit payment of \$5,000 on top of their actual costs (I’m just making up numbers) if over half the referred Youth enter unsubsidized employment, or earn their GED if they did not have a GED.

If the provider is a sub-recipient...

TANF along with most federal programs do not permit any for-profit entities to serve as sub-recipients. The Uniform Guidance at 2 CFR Part 200.69 excludes for-profit entities from the definition of non-federal entity, and only non-federal entities may serve as sub-recipients per 2 CFR Part 200.93.

For WIOA, the DOL was granted an exception to the Uniform Guidance that includes for-profit entities in the DOL definition of non-federal entity, and therefore as sub-recipients. This exception is at 2 CFR 2900.2 available at: <https://www.law.cornell.edu/cfr/text/2/2900.2> .

Also WIOA Final Rule at 20 CFR Part 683.295 permits profit for WIOA providers, see below:  
 § 683.295 Is earning of profit allowed under the Workforce Innovation and Opportunity Act?  
 (a)(1) Under secs. 121(d), 122(a) and 134(b) of WIOA, for-profit entities are eligible to be one-stop operators, service providers, and eligible training providers.  
 (2) Where for-profit entities are one-stop operators, service providers, and eligible training providers, and those entities are recipients of Federal financial assistance, the recipient or subrecipient and the for-profit entity must follow 2 CFR 200.323....

### **Program Enrollment**

**Q: Can you please clarify what is meant by participants in CCMEP need to have eligibility determined for both TANF and WIOA before they can be referred to CCMEP.**

A: The correct way to interpret this is that they (the lead agency) go(es) through the process of determination for each program and as long as they (the customer) is eligible for at least one, they can be referred to CCMEP and their services would be funded by the program they are eligible for. If they are eligible for both then there is simply more flexibility.

**Q: "Are OWF work-required CCMEP participants who are TANF eligible required to be co-enrolled in WIOA?"**

A: CCMEP is one program. When working with a new customer, you will need to determine eligibility for both TANF and WIOA, and consider both funding streams. The participant is not considered "co-enrolled." Please note that, while eligibility must be determined for both TANF and WIOA, that does not mean that a CCMEP customer who receives assistance with TANF funds is automatically enrolled in WIOA. A customer only becomes a participant in WIOA when he/she receives a WIOA-funded youth program service.

### **Program Services/Activities**

**Q: What are the program services provided by CCMEP?**

A: CCMEP has 14 program services. They are:

1. tutoring, study skills training, instruction and evidence-based dropout prevention;
2. alternative secondary school services and drop-out recovery services;
3. paid and unpaid work experiences (which combine occupational and academic education, and includes summer employment, pre-apprenticeship programs, internships, job shadowing, and on-the-job training);
4. occupational skill training;
5. education offered concurrently with workforce preparation activities;
6. leadership development;
7. supportive services;
8. adult mentoring;

9. follow-up services;
10. comprehensive guidance and counseling;
11. financial literacy education;
12. entrepreneurial skills training;
13. labor market and employment information; and
14. activities that help youth transition to post-secondary education and training.

**Q: where do I find the list of the 32 activities?**

A: The 14 services are listed in Rule 5101:14-1-02 and the 32 activities are listed in Rule 5101:14-1-05. Please see the following text:

“(C) What are the comprehensive case management and employment program (CCMEP) activities available to program participants?

Activities are assigned in order to ensure that program participants receive the appropriate service(s). Each activity must be connected to a service, and the available activities for program participants include, but are not limited to:

- (1) Unsubsidized employment.
- (2) Subsidized employment.
- (3) Work experience.
- (4) On-the-job training.
- (5) Job search.
- (6) Community service.
- (7) Vocational education training.
- (8) Job skills training directly related to employment.
- (9) Education directly related to employment in the case of a recipient who has not received a high school diploma or a certificate of high school equivalency.
- (10) Satisfactory attendance at secondary school or in a course of study leading to a certificate of general equivalence, in the case of a recipient who has not completed secondary school or received such a certificate.
- (11) Internships.
- (12) Summer employment.
- (13) Job shadowing.
- (14) Pre-apprenticeship opportunities. This includes programs or a set of strategies designed to prepare individuals to enter and succeed in registered apprenticeship programs and have a documented partnership with at least one, if not more, registered apprenticeship programs.
- (15) Career counseling. This includes a facilitated exploration of occupational and industry information that will lead to a first, new, or better job for the program participant.
- (16) Adult mentoring.
- (17) Entrepreneurial skills training.
- (18) Tutoring, study skills training.
- (19) Job readiness training.
- (20) Parenting classes.
- (21) Life skills classes.
- (22) Participation in an alcohol or drug addiction program certified by the department of mental health and addiction services under section 5119.36 of the Revised Code.
- (23) Finding a home in the case of a homeless assistance group.

(24) Residing in a domestic violence shelter, receiving counseling or treatment related to the domestic violence or participating in criminal justice activities against the domestic violence offender.

(25) Attending English as a second language course.

(26) Mental health treatment.

(27) Rehabilitation activities.

(28) Financial literacy education.

(29) Other workforce activities.

(30) Activities within OhioMeansJobs.com.

(31) The learning, earning and parenting (LEAP) program for individuals required to participate in accordance with rule 5101:1-23-50 of the Administrative Code.

(32) For veterans with a significant barrier to employment, a referral to the disabled veterans outreach program (DVOP) specialist as part of the jobs for veterans state grant.”

**Q: Can TANF funds be used for the same purposes as WIOA funds ...such as paying tuition, fees, books and other training-related costs?**

A: Refer to the TANF allowability section of the Service Matrix to determine which CCMEP activities may be funded with TANF dollars

**Q: Can TANF funds be used to pay incentives to youth? TANF would allow for incentive payments if used to reward or encourage particular behaviors or outcomes and NOT be used to meet ongoing basic needs or participation-related expenses.**

A: Please see the attached Family Assistance Letter #103 for guidance on the use of TANF funds for the purchase of gift cards.

**Q: Can you provide a full list of allowable activities and supportive services?**

A: The Benefits Matrix is now available and can be found at:  
<http://humanservices.ohio.gov/ccmepimplementation/Services-Matrix.stm>

**Q: Is there a time frame requirement in place for when the assessment and IOP are completed and when the services begin for the customer?**

A: The county department of job and family services or the OhioMeansJobs center has seven calendar days to make this referral to CCMEP. The referral is made in accordance with the process outlined in the CCMEP county plan. Once the referral is received by the lead agency, the lead agency has 10 working days to schedule an appointment in which the individual must undergo a comprehensive assessment resulting in the development of the individual opportunity plan. There is no timetable on when the IOP should be completed, but should be done as soon as possible so that services can begin. Services begin on the start date indicated in the IOP for each assigned CCMEP activity after the IOP is agreed upon and signed by the participant

**Waiver**

**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: As I understand it, DOL has not approved Ohio's waiver request on work participation requirements? Correct? But then I heard through the grapevine that Ohio is moving forward anyhow and implementing the waivers. Is this correct?**

A: The waiver has not yet been approved, but Ohio is going ahead and allowing case managers to assign CCMEP activities to individuals based upon the individual's needs and not on whether or not they are core or noncore work activities.

Here are the key principles to follow:

- All individuals in CCMEP will be treated the same and assigned to activities based on a comprehensive assessment.
- OWF recipients in CCMEP will not be held to the same assignment restrictions of core and non-core work participations hours.
- OWF recipients in CCMEP must continue to meet their minimum hour's requirement or they are subject to sanction.
- OWF recipients should be assigned to activities and services that lead to improved employment and education outcomes.

(For clarification, the waiver that we are speaking to in our response was to HHS as it pertains to TANF provisions, not USDOL waivers that were submitted as part of State Plan.)

### **WIOA In-School Youth**

**Q: With CCMEP will our Youth that are currently enrolled into OWCMS as "In-School" youth (if they are between the ages of 16-24) no longer be considered "In-School" Youth and we would just somehow transition them in OWCMS into the Youth CCMEP Plan?**

A: No. Even after the youth is transitioned into CCMEP, in OWCMS they will still be considered In-School youth for the purposes of determining what services they receive and 75 percent of the WIOA funds spent targeted to Out-of-School youth. (For example, In-School youth cannot receive an ITA unless they are co-enrolled as a WIOA Adult.)

### **Youth Ages 14-15**

**Q: Should we plan to dis-enroll current WIOA youth ages 14 and 15 prior to July 1, 2016?**

A: We suggest you do not dis-enroll WIOA youth ages 14-15. Your local workforce development area may continue to serve these youth. Working with 14- and 15-year-old youth, the emphasis is on career awareness. Since all of the 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 systems, and other partners who serve the local area's youth. These options do not require dis-enrollment. In addition, OhioMeansJobs.com has a variety of services available specific to working with youth on career exploration, resume writing, financial literacy, and other self-service. Please note that you will not be able to use TANF funds to serve these youth.

**Q: I currently have two 15 year olds that have been with our program for two years. They will both be turning 16. One turns 16 on August 15, 2016, and the other on September 2, 2015.**

**If we cannot serve them under WIOA monies, do I have to exit them? If I exit them, will they count against my measures? Both are currently on target to be successful outcomes. WIOA in-school youth, currently 15 years old and will turn 16 years old by August 31, 2016, will be transitioned to CCMEP and the lead agency.**

A: For WIOA in-school youth who are currently 14 years old or are currently 15 years old but not turning 16 years old by August 31, these participants will not be transitioned to CCMEP. Local workforce development areas may continue to provide WIOA youth program services to these participants using the second year WIOA youth allocation (PY 2015 carry-in funds). If the local area does not have any or does not have sufficient carry-in funds, the local workforce development board director may contact the Office of Workforce Development. If the youth reaches the age of 16 and is still in need of services, it is the discretion of the local area if the youth should be exited from the WIOA In-School Youth program and referred to (and enrolled into) CCMEP. Enrollment into CCMEP would mean that WIOA eligibility would be calculated and a referral to CCMEP would be made.

**Q: When CCMEP becomes effective July 1 what will happen to our youth (14-15 year old population)?**

A: WIOA in-school youth, currently 15 years old and will turn 16 years old by August 31, 2016, will be transitioned to CCMEP and the lead agency. For WIOA in-school youth who are currently 14 years old or are currently 15 years old but not turning 16 years old by August 31, these participants will not be transitioned to CCMEP. Local workforce development areas may continue to provide WIOA youth program services to these participants using the second year WIOA youth allocation (PY 2015 carry-in funds). If the local area does not have any or does not have sufficient carry-in funds, the local workforce development board director may contact the Office of Workforce Development.

**Q: Will we continue to serve them with WIOA funds until they reach 16 years of age?**

A: Local workforce development areas may continue to serve 14 and 15 years old (who will not turn 16 years old by August 31) WIOA youth using PY 2015 carry-in funds. If the youth reaches the age of 16 and is still in need of services, it is the discretion of the local area if the youth should be exited from the WIOA In-School Youth program and referred to (and enrolled into) CCMEP. Enrollment into CCMEP would mean that WIOA eligibility would be calculated and a referral to CCMEP would be made.