

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

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: WIOAMTL #1. It states "individuals who are eligible for the WIOA in-school or out-of-school youth program are required to participate in CCMEP" ... "In accordance with HB 64, each in-school or out-of-school youth that is age 16 to 24 and who is considered to have a barrier under WIOA shall participate in CCMEP as a condition of enrollment in activities funded by WIOA youth program". It also states as required populations: "WIOA low-income in-school and out-of-school youth ages 16 - 24". Issue: The first paragraph infers all WIOA youth must participate because it basically states "eligible for WIOA" and also states "all youth regardless of low-income or not must have a barrier to be WIOA eligible".

The second paragraph just refers to low-income as required to participate. These two paragraphs conflict with each other. Example: a youth could have a barrier (offender) but not be from a low-income family and would be WIOA eligible. Would this youth be required to participate in CCMEP? Please clarify.

A: While it does appear to be a contradiction in the law based upon not all WIOA participants are low-income, the rules clarify that all WIOA in- school and out-of-school youth, regardless of their income, are mandated CCMEP participants.

Q: Are OWF recipients who are excused from work participation due to medical, domestic violence, etc., but who still affect the county's work participation rate considered mandated CCMEP referrals?

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: We have a client that is 22 years of age that at her assessment with JFS provided a medical statement stating she is unemployable for 12 months. She is CCMEP required and must be referred to the program requiring intensive case management by Lead agency right?

A: If the customer is eligible for one or both of the programs (either mandatory or volunteer), then yes, the customer is required to be enrolled in CCMEP, and if the case worker determines that intensive case management is appropriate, that would be the proper course of action.

Q: For required to work OWF participants who are TANF eligible, in addition to enrolling them in CCMEP must we also co-enroll them in WIOA if eligible? ... thus counting in both WIOA and CCMEP performance. Or can we just put them in CCMEP and not co-enroll in WIOA?

A: The rules state that a WIOA Youth Application will be completed by OWF work eligible individuals as well as volunteers to determine if they are eligible for WIOA funded services. Although the determination of WIOA youth program eligibility is required, there is no requirement that services for this population of individuals must be funded through WIOA. It is up to the lead agency and the fiscal agent to determine how funding for services should be done. However, there are many advantages for using both funding sources for the delivery of services both during participation in the program as well as during follow-up services.

Q: 17 year old who is turning 18 in June just had a child in May. The 17 year old is on hardship cash assistance with her mother. We did not know she was pregnant until right before the baby was born, so May was the first month that the 17 year old was LEAP required. Is the 17 year old a required CCMEP participant (assuming she does not use the child under 12 months exemption)?

A: No, the 17 year old OWF recipient is not 'work eligible individual,' as defined in OAC rule 5101:1-3-12. 5101:1-23-50(R) addresses SSC requirements for minor heads of households in LEAP. Therefore the above mentioned individual is not required to participate in CCMEP. OWF recipients who are not work eligible individuals may volunteer to participate CCMEP, but are not required to do so as a condition of receipt of cash assistance.

Q: Do youths ages 16-24 have the choice to be CCMEP or are they required (whether they are explored through TANF or WIOA)? If they are required, is it only the youth who are registered for a WIOA program who should be referred?

A: All OWF work-required and all WIOA-eligible individuals must enroll in CCMEP to receive WIOA-funded and/or TANF-funded services. OWF non-work required individuals or individuals receiving PRC services within the past 30 days may volunteer for CCMEP, but are not required to participate.

Q: Example: If we have a youth age 21 who just needs assistance creating a resume prior to an interview...would that individual be required to register and be part of CCMEP if they did not need assistance after the resume.

A: The OhioMeansJobs centers and/or local WIOA staff still have the ability to determine whether or not individuals ages 18 to 24 will be served through the WIOA adult program or the WIOA youth program. If the decision is to serve the individual through the youth program, the individual will be determined WIOA youth eligible and referred to CCMEP. The decision as to

what WIOA program the individual should be served is based upon the necessary assistance that individual is seeking.

Q: If we have someone who does not wish to receive a cash benefit through TANF because they do not wish to cooperate with child support....do we then explore CCMEP services for them through WIOA eligibility?

A: There are two ways in which individuals are considered mandatory participants for CCMEP; either the individual is an OWF work-eligible or the individual is WIOA youth eligible. Additional exploration of TANF eligibility is only done for those individuals who have been determined WIOA youth eligible. If an individual does not want to receive a cash benefit (OWF cash assistance) and turns down the assistance, he or she would not be referred to CCMEP as an OWF work-eligible. However, if CCMEP services would provide benefit to the individual and the individual wishes to participate, the individual may be still be determined eligible through WIOA and referred to CCMEP or eligibility through being a volunteer (in receipt of PRC services or OWF non-work eligible individual) for CCMEP may be explored.

Q: Mom is 45- she has three children 16, 17, and 18- she is not CCMEP required. The kids are not work required only mom is. Do we have to refer the kids to CCMEP? If we do and they do not participate, do we sanction mom for her kid's failure?

A: No, since the children are not 'work eligible individuals,' as defined in OAC rule 5101:1-3-12 they are not required to participate in CCMEP. OWF recipients who are not work eligible individuals may volunteer to participate CCMEP, but are not required to do so as a condition of receipt of cash assistance.

Q: If an individual, 16 to 24 years old, comes into the OMJ center to look at the Job Board or update a resume are they "required" to be scheduled for eligibility?

A: In the scenario presented the customer would not be a mandatory CCMEP participant. Just coming in to the resource room to look for work had not determined eligibility for any services. Only if the customer was interested in exploring WIOA Youth services would they be asked to fill out the application and then if deemed eligible, would be a mandatory CCMEP participant.