

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

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: My understanding is that an individual may get WIOA services from any county regardless of county of residence. CCMEP will be required to have in the county of eligibility/residence. If a consumer chooses to get WIOA from another non mandated CCMEP county, how does this impact/how is this to be reviewed with services across county? Is the individual still permitted to get those services elsewhere as a required CCMEP participant?

A: CCMEP cases are managed by the CCMEP lead agency according to the county plan. This arrangement does not allow for a participant to receive services, regardless of funding source, in multiple counties. Therefore, the provision of all CCMEP services should be in the county in which OWF or PRC services are provided, which is the participant's county of residence.

Q: Is job development an allowable expense under CCMEP funding? For example, if we have a 19 year old receiving specific training services under CCMEP, could WD staff work with an employer to develop a position that would fit that person once they complete training and then charge that job development time to CCMEP? I don't see anything similar under the 14 elements.

A: Job development is not a CCMEP participant service or activity. Job development is an allowable business service under WIOA, and a local workforce area can develop a job for a business to which a CCMEP participant could be directed.

Q: Can a CCMEP contracted vendor secure training from a provider that is not on the WIET list? If so, what would the process be?

A: A procured youth services provider may secure training by another entity through which the youth provider has an arrangement, typically as noted in the response to the request for bids. In this type of situation the training entity is put on the local WIET list by the local workforce area. Please note that under this scenario, an ITA shall not be used.

Q: If the service provider puts training in the IOP, can they then purchase training and write the ITA? I hope this makes sense.

A: Under the scenario above, an ITA shall not be written. ITAs may only be written for training in which the training provider is on the state eligible training provider list in the WIET system. Please note that your local area's contract with your youth services provider may address this process.

Q: It was our understanding that the other training entity, for example the local community college, would put their services into the WIET system themselves. Is this still correct? Can the local workforce agency input the services for the entity now?

A: Two- and four-year public colleges (and universities) should enter their own information into WIET to become part of the statewide eligible training provider list. In these cases, ITAs can be written for the programs listed in WIET.

However, the local workforce agency would put training providers on their local list in WIET for procured training services for which ITAs are not written.

Q: Are we in any danger of falling into an ongoing "assistance" category if CCMEP services (TANF funded) extend beyond four months inclusive of case management or any of the 14 service elements? Our greatest concern is the CCMEP participant who is a PRC associated volunteer with no attachment to OWF or WIOA youth enrollment. Many or most of the 14 elements would typically extend beyond four months. We could limit these participants to brief interventions and brief case management and brief follow up, none of which to extend beyond four months in combination. We are hesitant to enroll any of these folks (non-OWF/WIOA youth) until we get a better understanding of the vulnerabilities related to "assistance".

A: According to pages 18-19 of the CCMEP Services guide, TANF funds used in CCMEP must not be TANF assistance. Please note the following quotes, what describe the differences between TANF assistance and TANF-funded CCMEP activities:

"In the administration of CCMEP, TANF funds may be used to pay for CCMEP activities and for CCMEP supportive services. A CCMEP activity is something that a CCMEP program participant is assigned to do in furtherance of the CCMEP hourly participation requirement; whereas CCMEP supportive services are intended to reduce barriers and enable participants to participate in CCMEP and to secure and retain employment.

"TANF funds used in CCMEP must not be TANF assistance. "TANF assistance" is a benefit directed at basic needs (e.g., food, clothing, shelter, utilities, household goods, personal care items, and general incidental expenses); and child care, transportation, and other supportive services that exceed four months for families that are not employed. TANF funds used to deal with a specific crisis situation or episode of need that are not intended to meet recurrent or ongoing needs and that exceed four months are also considered "TANF assistance."

For more technical assistance regarding TANF non-assistance spending, please see the PRC Reference

Guide here: <http://jfs.ohio.gov/OWF/prc/PRCReferenceGuide2.stm> ."

Q: Our interpretation of the guidance below is that we can provide ongoing services that are specifically included in the WIOA youth/CCMEP 14 services list for as long as the person is CCMEP

enrolled and TANF eligible without falling into the definition of “TANF assistance”. All other supportive services or barrier removal efforts will be documented as a one-time intervention. We will assure these latter services do not extend over multiple months as a single service or conglomeration of multiple discreet services.

A: Three points for clarification:

First, while you correctly note that you cannot cross over from ongoing CCMEP services to TANF assistance, the service received must support the participant’s CCMEP activities. You have to ask whether the proposed service is sought to specifically to support mandatory CCMEP activities outlined on the IOP.

Second, the receipt of CCMEP services must always be reasonable and appropriate. Again, this is based on the goals and services found in the individual service strategy, outlined on the IOP. In addition, not all services can be used for an indefinite period of time. For example, even in CCMEP “finding housing” has a four-month limit. (See page 21 of the Services Matrix).

Q: We are tracking attendance for the CCMEP participants referred from OWF. Is this required for those referred by WIOA Youth? If not, is it permitted at the discretion of the county?

A: For the purposes of eligibility, WIOA does not have a requirement to track attendance. However, we do expect that visits with a case manager and all activities be recorded. And of course, activity hours should be tracked as well. We do emphasize a common client experience and your county may track attendance in a way similar to that of OWF individuals enrolled in CCMEP.

Regardless of how you hand this, there is still the requirement to determine the reasons why an individual did not attend a service or activity, regardless of funding source. Therefore, the case manager should be tracking the completion of activities.

Q: Jefferson County CCMEP Staff members met with Jefferson County DJFS Child Care Case Workers this morning and a real life situation came up when discussing the payment of Child Care services when the OWF/TANF Participant is coming up for exhaustion of Child Care Benefits under OWF. Participant has been approved for CCMEP TANF currently and is in Work Experience for 20 hours per week and also is under Occupational Skills Training for 12 hours per week. Participant's Child Care for Work Experience is ready to expire on 8/31/2016, while will still be eligible for Child Care under Occupational Skills Training.

Could CCMEP/TANF opt to continue Participants Child Care while the participant is in Work Experience Hours (20 hours) per week or would CCMEP be held to the 4 month period of time as OWF/TANF is held to?

Can we utilize the same Child Care provider that is being used by JCDJFS and use our CCMEP TANF funds to pay for the Child Care or does the 4 month rule cancel out Child Care under TANF? The WIOA policy letter is for \$2.50 per hour child while in training which doesn't cover the Child Care provider amount use by the ODJFS.

Q: As long as the participant is an OWF WEI and in receipt of OWF cash assistance she/he can remain on publicly funded child care. If the individual has questions about their publicly funded

child care there is an email box the individual can use to contact child care for assistance:
CHILD_CARE_COUNTY_TECHNICAL_ASSISTANCE@jfs.ohio.gov

Once the person is not an OWF WEI then child care can be funded by TANF as “nonassistance” which has a four month limitation for unemployed individuals. There is nothing that would prohibit a county from utilizing TANF funds to operate a child care program except the natural TANF allowability and assistance provisions in 42 U.S.C. 601, 45 C.F.R. 260.20, and 45 C.F.R. 260.31. When a county uses TANF funds for this as a supportive service, they would be solely responsible for determining initial and continued eligibility and would not be able to utilize the Publicly Funded Child Care (PFCC) eligibility system, and would create a billing process as TANF funds are not to be paid directly to an individual. Also, the county could not force a child care provider to use the PFCC rate; providers could charge counties the market rate.

Q: Revised question: How is the four month time limit tracked for TANF funded supportive services to individuals not in receipt of OWF?

A: In accordance with paragraph (C)(13)(b) of rule 5101:14-1-03 of the Administrative Code a county’s CCMEP program plan must describe how the county will ensure that supportive services provided to program participants not already receiving OWF do not meet the definition of TANF assistance. The PRC Reference Guide is also helpful guidance for distinguishing between TANF “assistance” and “non-assistance.”

Q: Anyone in CCMEP through PRC eligibility or anyone who entered as an OWF recipient and has now lost OWF eligibility but remains under 200%.... If we spend TANF monies on them (not including case management??) beyond 4 months (do these months have to be consecutive?) the 5th month on will be counted as a month toward their 36 month time limitation of cash assistance and they are subject also to the OWF work participation requirements?

A: In accordance with paragraph (C)(13)(b) of rule 5101:14-1-03 of the Administrative Code a county’s CCMEP program plan must describe how the county will ensure that supportive services provided to program participants not already receiving OWF do not meet the definition of TANF assistance. The PRC Reference Guide is also helpful guidance for distinguishing between TANF “assistance” and “non-assistance.”

Q: Are we allowed to give TANF CCMEP Clients monies for transportation since we are mandating them assignments? If so, how would you suggest this process work at the County level? We currently provide transportation for TANF clients ONLY if it is JOB related.

A: Yes, TANF funding may be used for supportive services for Ohio Works First work eligible individuals participating in CCMEP activities assigned in their individual opportunity plan. For a work eligible individual, a CCMEP activity does not necessarily need to be job-related in order for the Lead Agency to assist with transportation with TANF funds.

Q: Training services are allowable under TANF funding for CCMEP as discussed in the benefits matrix. With WIOA funded training, it must be considered an in-demand occupation. Does training under TANF also need to be considered in-demand? For example, a customer would like to attend massage therapy, which is not currently listed as an in-demand occupation. Would this training be allowable under CCMEP-TANF funded training?

A: TANF does not have the same limitations on training as WIOA. Therefore you do not have to use the state in-demand occupation list. However, the training needs to be reasonable, appropriate, and meet the participant's goals as outlined in the IOP.