



Office of Human Services Innovation

Ohio Department of Job and Family Services

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Comprehensive Case Management and Employment Program

Fiscal Frequently Asked Questions (FAQs)

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This document provides responses to fiscal frequently asked questions to help inform local officials and administrators about the Comprehensive Case Management and Employment Program (CCMEP). The information presented is a collaborative effort between the Ohio Department of Job and Family Services (ODJFS) offices of Fiscal and Monitoring Services, Family Assistance, Workforce Development, Legal, and Human Services Innovation.

FAQs for County Commissioners

1Q: What is a Lead Agency?

1A: Am. Sub. H.B. 64 of the 131st General Assembly references the term Lead Agency as one local participating agency that administers the Comprehensive Case Management and Employment Program (CCMEP). The legislation defines a local participating agency as a County Department of Job and Family Services (CDJFS) or Workforce Development Agency (WDA) that serves the county.

2Q: In what ways is the Board of County Commissioners responsible for designating a Lead Agency?

2A: Am. Sub. H.B. 64 of the 131st General Assembly states each Board of County Commissioners shall designate either its CDJFS or the WDA as the Lead Agency for CCMEP no later than May 15, 2016. ODJFS recommends earlier designation of the Lead Agency in order to allow sufficient time for local planning.

3Q: If my CDJFS and WDA is a combined entity do I still need to designate a Lead Agency?

3A: Yes, each Board of County Commissioners will need to formally designate a Lead Agency if its CDJFS and WDA are combined. The county may still need to determine how the program will function operationally between its workforce and public assistance divisions. A list of Lead Agency options by county, based on the most recent ODJFS records, can be found [here](#).

4Q: How much funding will be available for CCMEP?

4A: For SFY 2017, a total of \$116.1 million will be available statewide to perform CCMEP program services as well as support allowable program administrative activities. This includes \$90.4 million from Temporary Assistance for Needy Families (TANF) and \$25.7 million from Workforce Innovation and Opportunity Act (WIOA) Youth federal funding streams. In November 2015, ODJFS provided CCMEP SFY 2017 county allocation estimates, by county and workforce area, which can be found [here](#).

5Q: Who will receive CCMEP TANF and CCMEP WIOA Youth allocations?

5A: The receipt of CCMEP allocations will depend on the Lead Agency designation. A visual of this funding flow can be found [here](#).

If a WDA is the Lead Agency: If the WDA is chosen as the Lead Agency, the CCMEP WIOA Youth and CCMEP TANF allocations will be awarded to the WIOA Fiscal Agent through a sub-grant agreement. The WIOA Fiscal Agent will issue this funding to the Lead Agency through an existing, or amended, sub-grant agreement.

If a CDJFS is the Lead Agency: If a CDJFS is chosen as a Lead Agency, the CCMEP WIOA Youth allocation will be awarded to the WIOA Fiscal Agent while the CCMEP TANF allocations will be awarded to the CDJFS through existing sub-grant agreements with ODJFS.

6Q: Can CCMEP funds be transferred from one county Lead Agency to another county Lead Agency?

6A: **CCMEP WIOA Youth:** Yes, current U.S. Department of Labor (USDOL) funding flexibility will not change. In order to maximize CCMEP WIOA Youth resources, Workforce Development Boards and WIOA Fiscal Agents should continue appropriate actions to minimize funding lapses at the end of the period of availability. This may include adjusting CCMEP WIOA Youth funds awarded to Lead Agencies within its workforce area.

CCMEP TANF: Yes, in order to maximize CCMEP TANF resources, a CDJFS Lead Agency may work with another CDJFS Lead Agency to transfer unspent and un-obligated CCMEP TANF funds from one to another. This transfer will include final agreement between the Boards of County Commissioners. ODJFS will provide additional guidance within the CCMEP fiscal rules on this matter.

7Q: How do the SFY 2017 CCMEP TANF allocations impact SFY 2017 TANF Regular and TANF Administration allocations?

7A: Statewide funding for the TANF Regular allocation levels remain unchanged for both SFY 2016 and SFY 2017. The TANF Administrative allocation is restructured by \$6.25 million in SFY 2017 to fund the CCMEP Administrative allocation.

FAQs for Workforce Development Boards and WIOA Fiscal Agents

8Q: In what ways should the Lead Agency partner with its local Workforce Development Board to administer CCMEP?

8A: The Lead Agency must collaborate with its local Workforce Development Board to actively coordinate CCMEP activities and establish guidelines for uniform administration of CCMEP which includes: procurement of services, selection of a basic skills assessment, ensuring the determination of eligibility for CCMEP WIOA Youth participants, reporting and collecting data, contract monitoring and

compliance with relevant local Workforce Development Board policies as well as the Workforce Development Board's local and regional plans.

As defined in federal law, the local Workforce Development Board has responsibility for the procurement of WIOA Youth service providers that will be used to deliver CCMEP WIOA Youth funded services. Due to the role of the Lead Agency as the CCMEP program administrator, this WIOA Youth procurement process cannot be done in isolation. WIOA Youth procurement must be done with input of the Lead Agency, which will be responsible for CCMEP implementation. Input is needed to make local area-specific decisions.

When involving the Lead Agency in the procurement process, the local Workforce Development Board must be aware if the Lead Agency is interested in bidding on Request for Bids to also serve as a WIOA Youth service provider. If the Lead Agency wishes to bid, it must separate itself from all aspects of the procurement process. The Board of County Commissioners will need to take all factors into consideration when designating the Lead Agency.

9Q: What are the main CCMEP responsibilities for the WIOA Fiscal Agent?

9A: If the Lead Agency is a WDA, financial responsibilities of the fiscal agent will include both the CCMEP WIOA Youth and CCMEP TANF funds. If the Lead Agency is a CDJFS, fiscal agent responsibilities will only apply to the CCMEP WIOA Youth funds. Overall, fiscal responsibilities include:

- fulfilling the responsibilities of a pass-through entity as defined in the Uniform Guidance at 2 CFR part 200.331, the duties of a WIOA Fiscal Agent, and the terms and conditions in the ODJFS sub-grant agreement;
- ensuring a sub-grant agreement exists with each CCMEP Lead Agency within the local area;
- monitoring the area's sub-recipients, including the CCMEP Lead Agency; and
- if directed by the Workforce Development Board, procuring the CCMEP WIOA Youth providers on the board's behalf.

10Q: What sub-grant agreement is the WIOA Fiscal Agent expected to enter into for purposes of this program?

10A: ODJFS will continue existing sub-grant agreements with each WIOA Fiscal Agent to receive all CCMEP WIOA Youth funds within its workforce area. These agreements may be amended to include CCMEP TANF funding, if the Lead Agency within a county is a WDA.

11Q: May WIOA Fiscal Agents manage CCMEP WIOA Youth program allocations at the workforce area level or will they be required to establish CCMEP WIOA Youth program sub-awards to each county within its workforce area?

11A: WIOA Fiscal Agents, in coordination with Lead Agencies, may exercise local flexibility on how best to manage CCMEP WIOA Youth program funds. Specifically, the Workforce Development Board and WIOA Fiscal Agent may decide to retain the CCMEP WIOA Youth program allocation at the WIOA Fiscal Agent level, issue a portion to the Lead Agency, or develop a CCMEP WIOA Youth program sub-grant agreement to award the entire CCMEP WIOA Youth program allocation to the Lead Agency.

If a CCMEP WIOA Youth program allocation is retained at the WIOA Fiscal Agent level, it will be the responsibility of both the Fiscal Agent and Lead Agency to establish their respective roles and responsibilities for procurement, invoice payment, monitoring, and other routine fiscal functions.

12Q: May a WIOA Fiscal Agent retain CCMEP WIOA Youth administrative funds?

12A: Yes, a reasonable portion of CCMEP WIOA Youth administrative funds may be used to support the activities of the local Workforce Development Board and WIOA Fiscal Agent, at the discretion of the Workforce Development Board.

Local areas should keep in mind that the definition of WIOA administration, as mentioned in this FAQ, specifies that all costs incurred for functions and activities of sub-recipients and contractors are program costs, unless the sub-recipient or contractor is performing only administrative functions. Therefore, most sub-recipient and contractors performing program functions that are funded with CCMEP WIOA Youth funds will not need to report administrative costs against the area's ten percent administrative expense limit.

13Q: May a WIOA Fiscal Agent retain CCMEP TANF administrative funds?

13A: Yes, up to ten percent of the TANF administrative funds may be retained at the WIOA Fiscal Agent level to support its administrative duties. WIOA Fiscal Agents will only receive CCMEP TANF funds if a WDA is a Lead Agency. If a CDJFS is chosen as the Lead Agency all CCMEP TANF administrative and program funds will be awarded directly to the CDJFS Lead Agency.

14Q: When CCMEP begins on July 1, 2016, Workforce Areas will still have access to PY 2015 WIA funds. How will CCMEP impact this funding source?

14A: Local Workforce Development Boards may use PY 2015 carry-over funds to: (1) liquidate PY 2015 obligations, (2) enable PY 2015 participants to complete their individual service strategies, or (3) award the carry-over funds as additional resources to the Lead Agency or CCMEP youth provider. In any case, local Workforce Development Boards and WIOA Fiscal Agents will be responsible to follow current and applicable fiscal rules and regulations.

15Q: Will local areas receive a separate WIOA Youth allocation for any non-CCMEP services?

15A: No, starting July 1, 2016, ODJFS will award WIOA Youth allocations named CCMEP WIOA Youth. Workforce areas will receive separate WIOA Adult and WIOA Dislocated Worker allocations.

FAQs for CCMEP Lead Agencies

16Q: What are the main responsibilities of the Lead Agency?

16A: Per Am. Sub. H.B. 64, the role of the Lead Agency is to administer the county's CCMEP. In order to accomplish this task, the Lead Agency will partner with the counties CDJFS, WDA, and/or applicable contractors/service providers to leverage existing expertise, local resources, and program activities to promote program success. The Lead Agency will also be responsible for submitting the county plan as identified in rule. The Lead Agency is responsible for all funds expended or claimed for CCMEP within its

county. However, financial management of CCMEP funds will be a combined effort between the Lead Agency, WIOA Fiscal Agent, and ODJFS.

17Q: Can a Lead Agency contract with a contractor/sub-recipient to perform CCMEP services?

17A: Yes, the Lead Agency may enter into a contractual or sub-grant agreement with an entity to perform CCMEP services. However, Workforce Development Boards are responsible for the procurement of the CCMEP WIOA Youth funded services.

18Q: What sub-grant agreement(s) is a WDA Lead Agency expected to enter into for purposes of this program?

18A: If the Lead Agency is a WDA, it must amend the existing sub-grant agreement with its area WIOA Fiscal Agent to receive CCMEP TANF funds. The sub-grant agreement will define any additional terms and conditions.

19Q: What sub-grant agreement(s) is a CDJFS Lead Agency expected to enter into for purposes of this program?

19A: If the Lead Agency is a CDJFS, it must enter into a new, or utilize an existing, sub-grant agreement with its area WIOA Fiscal Agent to receive CCMEP WIOA Youth funds. In addition, the CDJFS Lead Agency will utilize existing sub-grant agreements with ODJFS to receive CCMEP TANF funds.

20Q: Is CCMEP blending federal WIOA and TANF funds into one singular allocation?

20A: No. Although CCMEP is a combined effort between WIOA and TANF federal programs, the agency recognizes that separate federal and state reporting requirements exist and must be followed. In order to safeguard these dynamics, program and fiscal systems will be in place to assist county partners to only utilize funds for allowable purposes. CCMEP will have four separate allocations in the County Finance Information System (CFIS). The allocations will include:

1. CCMEP WIOA Youth, Program: WIOA Youth funding to provide allowable program expenses. Current SFY 2017 statewide estimates for this allocation are \$23.2 million.
2. CCMEP WIOA Youth, Admin.: WIOA Youth funding to support WIOA allowable administrative expenses. Current SFY 2017 statewide estimates for this allocation are \$2.6 million.
3. CCMEP TANF, Program: TANF funding to provide allowable program expenses. Current SFY 2017 statewide estimates for this allocation are \$84.1 million.
4. CCMEP TANF, Admin.: TANF funding to support TANF allowable administrative expenses. Current SFY 2017 statewide estimates for this allocation are \$6.2 million.

21Q: What is the CCMEP allocation methodology?

21A: ODJFS will use the TANF state formula, found in OAC 5101:9-6-08, to calculate each county's CCMEP TANF program and administrative allocation. ODJFS will use the WIOA federal formula, found in the draft WIOA Combined State Plan, to calculate each area's CCMEP WIOA Youth program and administrative allocation.

22Q: When will these four CCMEP allocations be made available?

22A: To support county planning, ODJFS distributed statewide CCMEP program and administrative estimates in November 2015 which can be found [here](#). These estimates were organized by county and workforce area. Keeping in line with the program start date final CCMEP allocations will be made available to spend on July 1, 2016. ODJFS will establish the four final CCMEP allocations within CFIS in June 2016.

23Q: What are the administrative definitions under TANF and WIOA?

23A: ODJFS follows federal and state definitions of allowable expenses to be claimed as either TANF or WIOA administrative expenses. These definitions have not changed for the purposes of CCMEP.

A major difference between TANF and WIOA administration definition is that TANF guidelines include eligibility determination as an administrative expense. Additionally, TANF guidelines dictate administrative activities remain an administrative expense, even if performed by a sub-recipient/contractor. Under WIOA, all costs incurred by a sub-recipient/contractor are program expenses, unless the sub-recipient/contractor is solely providing administrative support. Further detailed information can be found here:

TANF Administrative Definition: OAC 5101:9-6-08, Temporary Assistance for Needy Families (TANF) Administration Allocation.

WIOA Administrative Definition: Draft Notice of Proposed Rule-Making, Section 683.215

24Q: Will the Lead Agency receive additional funding before July 1, 2016 in order to prepare for program implementation?

24A: No, there are no dedicated allocations to fund planning activities before the official start of the program. However, ODJFS recognizes that local pre-planning activities are necessary to implement such a program and will discuss the use of existing county and local area allocations to support these efforts.

25Q: Can a Lead Agency certify existing and available TANF and/or WIOA funds to its Board of County Commissioners in order to enter into any pre-July 1, 2016 CCMEP related contract and then replace that certification with CCMEP allocations that are awarded July 1st?

25A: Yes, but only if the Board of County Commissioners approve this certification for CCMEP related contracts pre-July 2016.

26Q: What are the CCMEP allocation lifecycles?

26A: CCMEP WIOA Youth funds will be allocated in July of each state fiscal year and will remain available to the local area for two state fiscal years, plus a 90-day liquidation period. CCMEP TANF Youth funds

will be allocated in July of each state fiscal year and will remain available for one state fiscal year, plus a 90-day liquidation period.

27Q: What funding will be available to a Lead Agency if its CCMEP allocation is completely spent before June 30th?

27A: In line with existing agency program structures, ODJFS does not plan to issue additional allocations to Lead Agencies that exhaust their CCMEP funds before the end of the grant period.

28Q: If it desired, could a county use its TANF Regular allocation to fund a youth subsidized employment program for non-CCMEP eligible individuals at the end of the Summer Youth Program?

28A: Yes, as long as the youth subsidized employment program for non-CCMEP eligible individuals is included in the county Prevention, Retention, and Contingency (PRC) Plan.

29Q: What County Finance Information System (CFIS) changes can be expected for CCMEP?

29A: ODJFS is currently working to develop CFIS modifications to support the Lead Agency, mainly for reporting purposes. This will include the creation of CCMEP expense and RMS codes as well as the development of a dedicated space in CFIS to identify all available CCMEP TANF and CCMEP WIOA funding for the lead agency's use. Training on CFIS modifications is currently slated for June 2016.

30Q: Can a Lead Agency designate a staff member solely for CCMEP and direct charge their time in CFIS, instead of having this dedicated staff member utilize RMS?

30A: Yes, but only if the Lead Agency can direct charge the worker under CCMEP WIOA Youth or CCMEP TANF. A Lead Agency cannot direct charge a worker with two separate funding sources, i.e. both CCMEP WIOA Youth and CCMEP TANF.

31Q: When will CCMEP Fiscal Rules be available for county review and discussion?

31A: ODJFS currently plans for a late winter 2016 discussion and review of CCMEP Fiscal Rules.

For additional questions about CCMEP email: CCMEPQNA@jfs.ohio.gov