



**Comprehensive Case Management and Employment Program
Additional Fiscal Frequently Asked Questions (FAQs)
Distributed on 5/25/2016
Q13 clarified on 6/10/2016**

Q1: Under what circumstances will a WDA be required to establish a PA fund?

A1: When the WDA agency is the lead agency they will receive and manage the CCMEP WIOA Youth Allocations and the CCMEP TANF Allocations. In accordance with state requirements, they may use their current WIOA fund account for DOL funds but will set up a separate public assistance fund account for the TANF funding. A separate reporting process will be set up for WIOA agencies who are the lead agency. TANF funds will be tracked and reported quarterly with a JFS 02828 Quarterly Financial Certification, which is similar to the JFS 01992 certification and will be used to report TANF financial activities by WIOA agencies.

When the CDJFS is the lead agency they will operate as they have in the past.

Q2: Some agencies pay their WIOA staff and overhead costs from the PA Fund (Income Maintenance or Social Services). Will CCMEP RMS codes map the same way the current WIOA codes map within the PA fund? Then we enter the expenses for RMS costs by doing a transfer from WIOA to PA the same as we do now, only using WIOA & CCMEP codes?

A2: Yes. When the CDJFS is the lead agency, CCMEP WIOA RMS codes in the PA fund will process as the current WIOA RMS codes and WIOA will reimburse the PA fund as in the current process.

Q3: The original FAQs state we can keep framework services in house, but please advise if you find out any answers regarding keeping all pre-enrollment activities and some of the element activities (ITA's, OJT's).

A3: At this time Ohio has no waiver to provide any of the 14 WIOA funded youth elements in house. The law requires the board to procure the program elements competitively.

Q4: Some agencies have the understanding there will not be any NEW funds allocated for CCMEP, but rather earmarks of existing WIOA Youth and TANF allocations. Is this correct?

A4: The WIOA Youth and WIOA Youth Administration allocations will become CCMEP WIOA Youth and CCMEP WIOA Youth Administration.

TANF Administration is being reduced to create the CCMEP TANF Administration allocation. The state is limited to spending fifteen percent (%) of its total TANF grant on administrative costs, so no additional funding is available for administrative costs.

The CCMEP TANF Regular is a new allocation for SFY17 and does not reduce the TANF Regular allocation currently received by counties. In future years, the TANF Summer Youth budget will be absorbed in the CCMEP TANF funding, since the CCMEP is a year round youth program.

Q5: Since there are four allocations combined for the CCMEP effort, how are we to track expenses against each of the allocations? In other words, how are expenses to be allocated to each allocation?

A5: The allocation of expenses to each program depends on the activities and/or services provided to the participant. New RMS and expenditure codes have been developed to assist counties in tracking expenses for each allocation. In addition, the new Client Tracking Module in CFIS will assist the fiscal officer in determining the allowability of expenditures to individual funding sources for individual clients.

Q6: If earmarks of existing allocations are to be utilized for CCMEP, how much flexibility will there be between the allocations, if any? Additionally, will there be the opportunity to obtain additional funds for CCMEP if needed?

A6: The CCMEP allocations have the same requirements as the current WIOA and TANF allocations with very few exceptions. The flexibility that exists in the current WIOA and TANF allocations will remain for the CCMEP allocations.

At this time there are no additional CCMEP funds available. There will be the opportunity to obtain additional CCMEP funds through inter-county transfers and the January and April redistribution process.

Q7: Draft CCMEP rule 5101:9-5-01 states "Sub-recipient and contractors performing program functions that are funded with CCMEP WIOA youth funds may not be required to report administrative costs against the area's ten percent administration expense limit." Does this mean that, if WIOA funds are allocated by the Fiscal Agent to us, none of our costs will be considered administrative costs?

A7: Yes. In accordance with 683.215 of the Proposed WIOA rules, all costs incurred for functions and activities of sub-recipients and contractors are program costs. Therefore, sub-area costs for CCMEP WIOA are considered program costs and are charged as such. However, the Fiscal Agent may decide to issue a portion or all of its WIOA Youth Administration allocation to the sub-area. If this decision is made by the Fiscal Agent, the administration funding must be converted to program funding before being passed down to the sub-area. Also the language in the final version of draft rule 5101:9-5-01 has been changed to say "Sub-recipient and contractors performing program functions that are funded

with CCMEP WIOA youth funds do not report administrative costs against the area's ten percent administration expense limit”.

Q8: Draft rule 5101:9-5-01 also states "When a WDA serves as the lead agency, up to ten percent of the CCMEP TANF administrative allocation may be retained at the WIOA fiscal agent level for administrative costs." Does this mean that, if the lead agency is a CDJFS, the WIOA fiscal agent will NOT retain a portion of the TANF administrative allocation, since that wasn't specifically addressed in the rule?

A8: When a CDJFS is chosen as the lead agency, CCMEP TANF Allocations are awarded to the CDJFS. The CDJFS will determine the amount of administration funding to be used internally and what will be passed on to the WDA or other sub-recipients who are providing CCMEP TANF activities.

Q9: Since CCMEP funds are made up of TANF and WIOA funds, are the allowable costs for CCMEP the same as those for regular TANF and WIOA allocations? If not, where can we find the allowable costs for CCMEP?

A9: The allowable costs for CCMEP TANF and CCMEP WIOA will stay the same as TANF and WIOA. A document is being prepared that will define allowable costs for each allocation in more detail.

Q10: Draft CCMEP 5101:9-5-02 rule states the WIOA fiscal agent may retain all or part of the WIOA youth allocation for the management of competitively procured youth providers. Will this be retained as an allocation from the entire amount of CCMEP funds allocated to the Fiscal Agent by ODJFS or will it be dependent upon each county specifically? Will the sub-contract relationship be between the Fiscal Agent and the contractor specifically, or will those funds be passed through the lead agency in the county to the contractor?

A10: Each WIOA Area has operating procedures between themselves and the sub-areas. As long as the CCMEP rules are followed the WIOA Area may make those decisions.

Q11: Draft CCMEP rule 5101:9-5-01 states a local area may use a reasonable portion of the CCMEP WIOA Youth funds for the administrative costs of carrying out CCMEP WIOA youth activities. What will the "reasonable portion" be?

A11: Federal regulations set a limit on what can be charged to administration and the amount of each allocation that can be used for administration. That amount is distributed to the WIOA Areas by the state. It is up to the WIOA Area and the sub-area to determine what a reasonable portion is the WIOA Area is willing to share with the sub-area. Again the WIOA Area has operating procedures with their subareas and will determine the amount of CCMEP WIOA Youth administration funding that is appropriate to be retained at the Fiscal Agent level.

Q12: Since CCMEP funds will be coming through the Fiscal Agent, how will you require accounting for these funds? Will you require that CFIS LR be utilized?

A12: There will be a new menu page under SL Functions for CCMEP where all CCMEP related expenses will be entered. The Client Tracking Module will be part of the reporting process and it is linked to CFIS LR. Therefore CFIS LR will be required for the CCMEP portion of expense reporting.

Q13: Any update on the status of serving In-school youth and 14 – 15 year olds once CCMEP starts?

A13: Areas may serve in-school youth under CCMEP using up to 25% of CCMEP funds. For youth age 14 and 15, OWD has recommended using PY15 (carry-in) funds and/or transitioning them to other funding sources, partners, or school programs.

Q14: If we hire a caseworker to do only CCMEP TANF or CCMEP WIOA youth, can we direct charge this caseworker's salary and fringe?

A14: Agencies may direct charge a caseworker, if they are working on only CCMEP TANF or only CCMEP WIOA Youth. If at any time they are working with both CCMEP TANF and CCMEP WIOA Youth they must be in the cost pool and participate in RMS. Additionally, it must be documented in their position description and reviewed semi-annually to confirm their job function.

It is recommended the worker participate in the cost pool and RMS because of the potential to be working with clients receiving services funded by both CCMEP TANF and CCMEP WIOA Youth. Also, if the caseworker is direct charged CCMEP TANF and/or CCMEP WIOA Youth are not being fully utilized for shared costs.

Q15: If a caseworker gets an RMS hit during determination of eligibility for CCMEP services what funding source (RMS code) should they choose when they complete the RMS?

A15: The caseworker should determine what federal funding (TANF or WIOA Youth) they were reviewing at the time of the RMS and select the appropriate code.

Q16: Can TANF CCMEP funds be used for follow up services if the participant/client is no longer eligible for TANF due to income status changes, etc.?

A16: Once a CCMEP client is no longer TANF eligible then TANF funds can no longer be used to pay for any services, including follow up. If the client was eligible for both TANF and WIOA and co-enrolled then CCMEP WIOA funds can pay for follow up services.

Q17: Will there be post allocated adjustments available between TANF Regular/Admin and TANF CCMEP/Admin?

A17: Post allocation adjustments will be available to move CCMEP TANF and CCMEP TANF Admin expenditures to TANF Regular and TANF Admin.