



Bob Taft
Governor

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Director

Ohio Department of Human Services

30 East Broad Street, Columbus, Ohio 43266-0423

February 24, 2000

OWF/PRC Guidance Letter No. 15

TO: Directors, County Departments of Human Services
Directors, County Public Children Services Agencies
Directors, Child Support Enforcement Agencies

FROM: Jacqueline Romer-Sensky, Director

A handwritten signature in black ink, appearing to read "Jacqueline Romer-Sensky".

SUBJECT: **EDUCATIONAL ACTIVITIES**

The Ohio Department of Human Services (ODHS) issues a series of guidance letters related to Ohio Works First (OWF) and Prevention, Retention and Contingency (PRC) programs. We have received many questions related to assignment of educational activities. This letter consolidates and updates issues related to assigning OWF assistance groups to education-related activities and to provide information about providing educational opportunities and services to low-income families through the PRC program. Additionally, state law is unequivocal about the ODHS's responsibility to actively work with all participants in OWF to involve them in activities that lead to self-sufficiency. Please refer to OWF/PRC Guidance Letter No. 2 for more information about this mandate.

GOAL OF ASSIGNMENT

County staff are encouraged to make appropriate assignments to regular, developmental or alternative work activities based on the assessment of each individual's education, work history, skills, abilities, interests, and on the needs of the family. The goal of an assignment to a work activity is the self-sufficiency of the family. Meeting the participation rates are important, but the main goal of welfare reform is meeting the needs of the family and helping the family become self-sufficient.

For some individuals an educational assignment is an appropriate activity to help the individual become self-sufficient. Federal and state law allows these types of assignments to count towards the participation rates with certain limitations. A thorough discussion of those limitations can be found in OWF/PRC Guidance Letter No. 5. For some individuals an assignment to an education activity that does not meet the federal participation rates may be appropriate if this will contribute to the family's self-sufficiency.

If an educational assignment is the most appropriate assignment to help the family become self-sufficient, the county is encouraged to make those assignments. Those assignments include: Adult Basic and Literacy Education, Post Secondary Education, Vocational Education, Job Skills Training, Micro- Enterprise Self Employment and Education Related To Employment.

OWF/PRC GUIDANCE LETTER NO. 15

February 24, 2000

Page 2 of 3

NEW EDUCATIONAL ACTIVITIES

Two new educational activities were added on October 1, 1999 to expand educational opportunities in Ohio. They are Job Skills Training and Education directly related to employment for someone without a high school diploma or GED.

Job Skills Training is a program designed to increase an individual's employability potential. It may include college, technical, vocational or other course work. It may also include activities ensuring that participants become familiar with workplace expectations and exhibit work behavior and attitudes necessary to compete successfully in the labor market. Various types of structured programs would qualify, e.g., rehabilitation services, counseling, personal development and pre-employment classes. Study time may be included as part of this activity.

Education Related to Employment is any educational program provided to someone who does not have a high school diploma or GED. Study time may be included as part of this activity.

The CDHS may choose to extend post-secondary and vocational educational activities beyond 12 months. However, see OWF/PRC Guidance Letter No. 5 for assignment limitations for these activities.

WORK ACTIVITY ASSIGNMENT ISSUES

As there are minimal definitions of each work activity in federal and state law, each CDHS has some flexibility in how to define each work activity. It appears some CDHSs are using narrow definitions or using old JOBS definitions. The activities do not have to be defined the way they were under the old JOBS program. When defining work activities, it is suggested that the CDHS use the "reasonableness" factor. Would the explanation for how the CDHS defined a work activity seem reasonable to an outside observer?

For example, typically CDHSs have defined postsecondary education as education at a two- or four-year college. However, if skill or occupational training is involved, it can be defined and coded as vocational education or job skills training. In addition, the hours spent in an internship or lab can be defined and coded as WEP. Language in the preamble to the TANF regulations specifically states that "postsecondary education could fit within the definition of one or more of the 12 (federally allowable) work activities."

In addition, study time can be included in the definition of educational activities. The preamble to the TANF regulations states that "a State could choose to include homework time as part of an activity."

The preamble goes on to say that "we encourage States to consider carefully how Congress intended to treat homework in determining "engaging in work" to ensure that its interpretation is reasonable."

OWF/PRC GUIDANCE LETTER NO. 15

February 24, 2000

Page 3 of 3

COMBINING EDUCATION WITH WORK

The preamble to the TANF regulations states that “According to the Manpower Demonstration Research Corporation’s publication, “Work First,” the most successful work first programs have shared some characteristics: 1) a mixed strategy including job search, education and training, and other activities and services; 2) an emphasis on employment in all activities; 3) a strong, consistent message; 4) a commitment of adequate resources to serve the full mandatory population; 5) enforcement of participation requirements; and 6) a cost-conscious management style.”

The preamble goes on to state, “While the most successful programs consistently and strongly emphasize work, the actual program designs recognize and address the critical role education plays in preparing adults for work.”

One strategy CDHSs have used is to combine education with work. Some counties have developed on-campus WEP positions so that an individual can do their WEP assignment at their school. In addition, some individuals can combine work study, OJT or part-time employment with school.

EDUCATIONAL ACTIVITIES FOR LOW-INCOME FAMILIES

Educational services provided by counties are for more than the OWF population. Low-income families needing assistance to increase their job opportunities can benefit from educational training and skills development services that counties can provide for them through their PRC programs. When appropriate counties should assess low-income families needs for additional educational programs and provide these services to them to increase their opportunities in the labor market..

If you have any questions about this letter, please contact your Account Manager.

cc: County Commissioners Association
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