

Urban Youth Works *Frequently Asked Questions*

Program Management

- PQ1. Will the online reporting system operate using Firefox or Safari?
- PA1. No, the system does not support Firefox or Safari. It is only fully functional using Internet Explorer.
- PQ2. Online reporting system questions regarding Case Notes: Can you copy and paste text from Microsoft Word into Case Notes? Can you upload and attach files into Case Notes? Can we print Case Notes as they are listed in the online reporting system?
- PA2. Yes, you can copy text from Microsoft Word and paste it into Case Notes. Please note, we were only able to paste text into Case Notes using Ctrl V; the paste function did not appear when we right clicked the mouse in Case Notes. No, you cannot upload files or attach files into Case Notes. You cannot print Case Notes directly from the file; if the file is long all of the notes will not print. You can highlight the notes, copy them and paste them into Microsoft Word for printing purposes.
- PQ3. If a youth participant leaves the program (exits) and then reenters at a later date, does this count as two enrollments?
- PA3. No, it would count as one enrollment. Since the grant is only 14 months long, youth should not be exiting and reentering. If there is a gap in one service end date and the start date for the next service, you do not need to exit the youth. You should maintain contact keeping the youth engaged and, if necessary, provide any supportive services the youth needs during that time. If you do exit them, the online reporting system will not allow you to change the exit date; you would have to create a new record for that youth. However, for reporting purposes we will only count that youth once, not twice.
- PQ4. The reporting timeline indicates that quarterly reports (program and fiscal) are due on Jan. 10, April 10, July 10 and Oct. 10. If these dates fall on a Saturday or Sunday, would the due dates roll over to the following Monday?
- PA4. Yes, you can submit quarterly reports on the Monday following a weekend due date.

PQ5. Are stipends taxable?

PA5. If the stipend is associated with a work experience wage, then yes it is taxable. A training stipend, however, that falls under a supportive service then typically is not taxable.

PQ6. What are the 2009 poverty guidelines?

PA6. The 2009 poverty guidelines for the 48 contiguous states and the District of Columbia are:

Persons in family	200% poverty guideline
1	\$21,660
2	\$29,148
3	\$36,624
4	\$44,100
5	\$51,588
6	\$59,064
7	\$66,540
8	\$74,028
9	\$81,504
10	\$88,980

Updated poverty guidelines may also be found online through the US Department of Health and Human Services at <http://aspe.hhs.gov/poverty>.

PQ7. Do stipends and/or wages count against other assistance programs including food assistance, cash assistance and child care?

PA7. *Food assistance* – Section 181(a)(2) of the Workforce Investment Act [29 U.S.C. §2931 (a)(2)] states that allowances, earnings and payments to individuals participating in programs under Title I of the Workforce Investment Act are not to be considered as income for purposes of determining eligibility for federal or federally assisted programs based on need. However, the Food and Nutrition Act of 2008 also includes language that explicitly states that only certain income from on-the-job training programs under the

Workforce Investment Act may be excluded for purposes of determining eligibility for food assistance.

Federal SNAP law, at 7 U.S.C. §2014 (l), explicitly states that, notwithstanding section 181(a)(2) of the Workforce Investment Act, earnings from WIA on-the-job training programs must be counted except for those participating in the program who are 14-18 years old. Income received by those participating in the program age 19 or older must be counted. This policy has been implemented through Ohio Administrative Code Rule 5101:4-4-19(A)(5). The United States Department of Agriculture, Food Nutrition Service has confirmed that this is the correct interpretation of this policy and will be issuing guidance in the near future.

Training allowances under the Workforce Investment Act are excluded from consideration as income because they are considered a reimbursement, pursuant to Ohio Administrative Code Rule 5101:4-4-19(A)(3).

Cash Assistance – Federal law for the Temporary Assistance for Needy Families (TANF) program does not have any specific exclusions for income. As a result, state TANF programs must follow the exclusion set forth in section 181(a)(2) of the Workforce Investment Act, 29 U.S.C. §2931(a)(2). Therefore, all WIA payments to participating youth are excluded, including payments to youth ages 19 and older. Ohio Administrative Code Rule 5101:1-23-20(D)(1)(f) would apply to this policy: "[I]ncome which is excluded from gross earned income under OWF includes the following:...Any other income amounts that federal statutes or regulations and sections 5101.17 and 5117.10 of the Revised Code require be excluded." Disability Financial Assistance and Refugee Cash Assistance income rules follow the Ohio Works First program and therefore the income would also be excluded for those programs.

Child Care – Federal law for child care does not have specific exclusions for income. As a result, the exclusion set forth in section 181(a)(2) of the Workforce Investment Act, 29 U.S.C. §2931(a)(2), will apply to child care eligibility determinations for this income. Income earned through on-the-job training is excluded, including those youth participating who are ages 19-24. Ohio Administrative Code Rule 5101:2-16-34 (D)(8), pertaining to excluded income, applies to this policy: "Any other income amounts that federal statutes or regulations require be excluded."

Source: ODJFS Office of Families & Children Letter #85 (Family Stability), <http://jfs.ohio.gov/ofam/pdf/OFSL%2385SummerYouthProgramClarification.pdf>.

- PQ8. Does youth disengaged from the education system include youth who have received their diploma or GED, but are not enrolled in any post-secondary education?
- PA8. Yes. In the RFP, the definition of youth disengaged from the education system focuses on secondary education. If youth graduated with their diploma or GED and are not

currently enrolled in any post-secondary education, they are considered disengaged from the education system.

- PQ9. Based on Governor Strickland's Executive Order 2007-09S, Imposing Limits on the Use of Public Funds for the Purchase of Food, what limitations, if any, do we have on the purchase of food as it relates to the implementation of the grant?
- PA9. Although the Executive Order states that "Food expenses covered by federal grants or other federal funds..." are permitted, the state does have limitations on the purchase of food. Grantees may not purchase food for their employees or the employees of their partners or other organizations. Grantees may purchase food for the youth they serve as part of their participation activities.
- PQ10. Which travel rules, state or federal, do grantees follow?
- PA10. Grantees should follow state travel rules. Expense reimbursement authorized by the agreement is limited to actual and necessary expenses subject to the limits established pursuant to Ohio Revised Code 126.31, and set forth in Section 126-1-02 of the Ohio Administrative Code (OAC), as well as any other laws, regulations, or Governor's Executive orders limiting travel expenses. State travel rules can be found at <http://obm.ohio.gov/MiscPages/TravelRule/>.

Fiscal Management

- FQ1. If funds are encumbered during the month through a purchase order or time card submission, can they be invoiced for that month?
- FA1. The short answer is no. This is a cost-reimbursement grant, so invoices should only include costs expended/paid. Article III B in the Subgrant Agreement states: Compensation will be made monthly as reimbursement for actual, allowable expenditures incurred and paid by SUBGRANTEE during the billing period...
- FQ2. How much detail does ODJFS want on the monthly Invoice and the Invoice – Itemized List of Expenses?
- FA2. For the Invoice, all costs for each cost category should be rolled up into one large amount for that month. For the Invoice – Itemized List of Expenses, you will need to provide details on your expenditures for each cost category. You may have multiple lines (rows) for each cost category as you provide expenditures for that category.

For example, if costs have been expended for youth wages, the total cost should be on the Invoice, and detailed costs should be included on the Invoice – Itemized List of

Expenses. The details should include the date of payment. For the youth wage example, you would include details such as 10 youth at \$9 per hour working 20 hours per week for a total cost of \$7200. For utilities, the Invoice should include the total amount of your utilities for the month, but provide a breakdown of what you paid and the date paid for each utility in the Invoice – Itemized List of Expenses.

- FQ3. Can we [grantees] use our general ledgers instead of the Invoice – Itemized List of Expenses?
- FA3. The short answer is no. We have created template forms, so there is consistency in the information we receive from grantees in all the monthly, quarterly and final reports. We want grantees to use the Invoice – Itemized List of Expenses so their detailed expenditures are documented consistently.
- FQ4. The Code of Federal Regulations for WIA state that direct service providers are only allowed to have program costs. It states in the RFP for UYW that we can have administrative costs as long as they are no more than 10 percent of the budget. Are grantees allowed to have administrative costs?
- FA4. Yes. ODJFS, in our reporting to USDOL, will report all of your costs as program costs; however as the administrative entity of the grant, for your budget and grant management, you are allowed to have administrative costs. Those costs must adhere to what the federal regulations deem as allowable and the percentage allowable in the grant, but you can categorize your budget accordingly.
- FQ5. For 1512 FTE Calculation reports, do we report only jobs created or all FTEs that are part of the grant?
- FA5. According to TEGL 01-09, recipients are required to report an estimate of jobs directly created or retained to administer and implement the grant. Recipients are required to report an aggregate number for the cumulative jobs created or retained for the quarter. A job created is a new position created and filled or an existing unfilled position that is filled as a result of the grant. A job retained is an existing position that would not have been continued to be filled were it not for grant funding. A job cannot be counted as both created and retained. Employees who are not directly charged to grant supported projects/activities, which nonetheless provide critical indirect support (e.g. clerical/administrative staff, department administrators, etc.) are not counted as jobs created or retained.

FQ6. Do we need to keep timesheets for both our employees and our youth participants?

FA6. Yes. For reporting and monitoring purposes, you need to keep timesheets. For your employees, you need to demonstrate how many hours they worked on the grant to include in the invoice and in the 1512 monthly FTE calculations. For youth, you also need to keep timesheets to track how many hours they worked not only for reporting, but also for invoicing if you are subsidizing the employment. The monitors will request timesheets to cross reference invoices and reports.