



Ohio Department of Job and Family Services

COMPREHENSIVE CASE MANAGEMENT AND EMPLOYMENT PROGRAM (CCMEP) PLAN

for

County or Counties: Franklin

Effective Date: 3/30/2020

Plan Submission

Each Lead Agency is required to adopt and submit a CCMEP Program Plan to the Ohio Department of Job and Family Services (ODJFS) each fiscal biennial period. The CCMEP plan must be submitted **no later than October 1st each biennium.**

The plan may be amended by the Lead Agency as needed. An amended plan must be submitted to ODJFS no later than 10 calendar days after the amended program plan becomes effective. For each amendment, the submission must contain one version that clearly indicates what was added or stricken from the prior effective plan and one version that reflects the final plan with all amendments included.

If a board of county commissioners redesignates the Lead Agency during a fiscal biennial period, the new Lead Agency shall prepare and submit to ODJFS a new CCMEP plan not later than sixty calendar days after the redesignation takes effect.

The plan review process will be used to ensure that Lead Agencies meet program requirements. If ODJFS determines that a CCMEP plan is not consistent with the requirements of program rules, the plan will be returned to the Lead Agency for amendment.

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1. Lead Agency and Coordination with Partners

Each board of county commissioners is required to choose a single Lead Agency, either the CDJFS or workforce development agency that serves the county, to administer CCMEP. A single Lead Agency is necessary to ensure accountability for program performance and results.

1.1 Identify the Lead Agency designated to administer the CCMEP program.

Lead Agency Name Franklin County Department of Job and Family Services			
Lead Agency Address 1721 Northland Park Avenue	City Columbus	State OH	Zip Code 43229
First Name of Lead Agency Official Joy	Last Name of Lead Agency Official Bivens	Title of Lead Agency Official Agency Director	
Phone Number (614) 233-2105	Email Address jbivens@fcdjfs.franklincountyohio.gov		

Program Contact Persons Vivian Turner	Phone Number (614) 212-1815
Phone Number (614) 212-1815	Email Address vivian.turner@jfs.ohio.gov

Fiscal Contact Person Christy Russell	
Phone Number (614) 233-2055	Email Address crussell@fcdjfs.franklincountyohio.gov

1.2 Identify the other local participating agency (i.e., CDJFS or workforce development agency that serves the county).

Agency Name Workforce Development Board of Central Ohio			
Agency Address 1650 Lake Shore Drive, Suite 110	City Columbus	State Ohio	Zip Code 43204
First Name of Lead Agency Official Lisa	Last Name of Lead Agency Official Patt-McDaniel	Title of Lead Agency Official President & CEO	
Phone Number 614-559-5060	Email Address pattmcdaniel@wdbco.org		

1.3 Identify the workforce development board and area for the county.

Workforce Development Area Area 11	
Workforce Development Board Chair Name Jim Negron	
Workforce Development Board Director Name Lisa Patt-McDaniel	
Phone Number 614-559-5064	Email Address pattmcdaniel@wdbco.org

1.4 Identify the implementation manager for the Lead Agency.

First Name of Implementation Manager Marcie Littlejohn	Last Name of Implementation Marcie Littlejohn	Title of Implementation Manager Administrative Officer
Phone Number (614)233-2650	Email Address marcie.littlejohn@jfs.ohio.gov	

1.5 Lead Agency’s performance and data management contact:

Contact Person Vivian Turner	
Phone Number (614)212-1812	Email Address vivivan.turner@jfs.ohio.gov

1.6 How does the Lead Agency partner with the other local participating agency (CDJFS or workforce development agency) to implement CCMEP?

Describe:
Franklin County Department of Job and Family Services (FCDJFS) and the Workforce Development Board of Central Ohio (WDBCO) have partnered to ensure the success of CCMEP, from implementation through ongoing operations. Our agencies have worked and will continue to work with our providers and community stakeholders to develop and implement CCMEP policies and best practices.

FCDJFS and the WDBCO cooperate in the procurement, contracting, and management of WIOA and TANF programming while ensuring an effective delivery system for CCMEP activities offered by local youth-serving organizations. This delivery system is intended to integrate services, including WIOA youth program elements and TANF participation requirements.

Our cooperation is already getting results, including the drafting and release of a joint TANF/WIOA procurement for out-of-school CCMEP services. This joint procurement and contracting creates a robust service delivery system with standardized policies, reporting, and performance metrics. Collaboration between our agencies is also reflected in the procurement of our 2017 TANF Ohio Youth Works and WIOA Summer Internship programs.

1.7 How does the Lead Agency plan to partner and actively collaborate with the local workforce development board including but not limited to (Please attach any relevant policies to this plan.):

- Frequency of meetings
- Engagement of local businesses
- Engagement of community partners
- Develop policies for work experience and incentives

Describe:
FCDJFS and the WDBCO established uniform guidelines for CCMEP administration, using common intake applications and case management teams for TANF and WIOA-funded participants. We decided on the Test of Adult Basic Education (TABE) and the Basic English Skills Test (BEST) as skill assessments and have agreed to accept the results of other assessment tools if administered within six months of CCMEP enrollment. Franklin County will offer participant incentives. FCDJFS was included as a provider of framework services and will determine eligibility for TANF and OWF participants. We have established uniform data collection and reporting standards, using OWCMS and internal data systems. WDBCO and FCDJFS will continue to align and share the results of contract monitoring, as appropriate.

Moving forward into the next phase of CCMEP implementation, FCDJFS and WDBCO will regularly meet with community stakeholders and procured service providers to review program effectiveness and revise policies if needed. Our Work Experience policy is included as Appendix B on page 24.

1.8 List policies developed by the local workforce board relevant to the administration of CCMEP, including but not limited to (Please attach any relevant policies to this plan.):

- Select basic skills assessment(s);
- Ensure determination of eligibility for the Workforce Innovation and Opportunity Act (WIOA) youth program;
- Report and collect data;
- Monitor contracts and ensure compliance;
- Supportive services;
- Follow up services;
- “Needs additional assistance” policy; and
- Disclosure of relationship.

Describe:

In partnership with FCDJFS, the WDBCO established the following policies for the administration of CCMEP:

- Basic Skills assessments: see section 5.2
- Supportive Services: see section 6.3
- Conflict of Interest that addresses disclosure of relationship: see Appendix A
- Work Experience/OJT: see Appendix B
- Individual Training Accounts: see Appendix C
- Rights and Responsibilities: see Appendix D
- Youth Service Provider Monitoring (Fiscal and Monitoring): see Appendix E
- Follow-up Services: see section 6.4, Supportive Services Table Appendix I
- Incentives: see section 1.7
- Household composition: see section 4.5
- Data Collection and Reporting: see Appendix F
- Area 11: Local Policy WIOA Youth Eligibility & Youth Requiring Additional Assistance see Appendix G
- Release of Information: see Appendix H

This plan is subject to joint revisions by FCDJFS and the WDBCO; these revisions will be reflected in future updates to the plan.

1.9 What other partners/providers are the Lead Agency collaborating with to implement CCMEP? Please provide name(s) and services to be provided. Check all that apply.

Before the end of the year, the Lead Agency and WDBCO will convene local partners and providers to provide an overview of the CCMEP program and to identify the most effective ways to collaborate and make referrals to ensure the availability of services for CCMEP participants. By the end of the first quarter any needed contracts or MOUs will be secured. The following summarizes current engagement activities:

Adult Basic Literacy and Education (ABLE) Providers

FCDJFS and the WDBCO work with ASPIRE, Columbus State Community College, and Cengage to provide literacy services.

Alcohol, Drug and Mental Health (ADAMH) Board

FCDJFS intends to develop collaborative relationship with the Alcohol, Drug and Mental Health (ADAMH) Board. We currently use an expedited referral system established to serve participants with Mental Health barriers with NYAP (National Youth Advocate Program).

Businesses

FCDJFS partners with the Franklin County Department of Economic Development's Peopleworks program for job placement and training opportunities. The WDBCO's Business Solutions staff coordinates job placement opportunities with CCMEP providers.

Career and Technical Education

WDBCO works with local labor organizations for pre-apprenticeship and apprenticeship opportunities for CCMEP clients. WDBCO has relationships with and will send CCMEP referrals to WIET-approved career and technical education providers.

Child Care Providers

FCDJFS partners with Action for Children to support expedited child care placement.

Child Support Enforcement Agency

WDBCO is developing a CCMEP referral system with Child Support Enforcement.

Children Services Agency

WDBCO collaborates with Franklin County Children Services to serve 50 foster youth enrolled in CCMEP through a contract with IMPACT.

Community College(s)

FCDJFS partners with Columbus State Community College and has staff on-site at least once per month.

Community Action Agency

Our local community action agency, IMPACT, is a procured provider of CCMEP services on behalf of both FCDJFS and the WDBCO.

County Family Service Planning Committee

Family and Children First Council

Juvenile Court System

We are developing a CCMEP referral system with the Franklin County juvenile justice system and Ohio Department of Youth Services.

Local Healthier Buckeye Council

Local School District(s)

Columbus City Schools is represented on the WDBCO; its representative chairs the Youth Committee. The CEO of the WDBCO has or will meet with every school superintendent in the county to make them aware of services provided through CCMEP and the OMJ center.

Vocational Rehabilitation (Opportunities for Ohioans with Disabilities (OOD))

OOD is also represented on the WDBCO and has committed to developing a CCMEP referral process for OOD clients.

Other

Other partners include Eckerd Workforce Development, Eckerd Youth Alternatives, the Academy Of Urban Scholars, the 22+ Adult HSD Program, the Volunteers of America Family Shelter, the YMCA Family Shelter, the Salvation Army, the Van Buren Family Shelter, Ohio Means Jobs, Flex High, Furniture Bank Of Ohio, Job Corps, Ultimate Health Care Solutions, the Columbus Health Department, Amethyst, Maryhaven, Goodwill, Columbus Literacy Council, IMPACT Community Action, Lead the Way Learning Academy, St. Stephen's Community House.

2. Population Served

Lead Agencies must serve individuals in the CCMEP program in compliance with the following:

- Individuals **required** to participate: 1) work-eligible participants in the Ohio Works First (OWF) program; and 2) individuals who are in-school youth or out-of-school youth as a condition of enrollment in workforce development activities funded by WIOA.
- Individuals who may **volunteer** to participate: 1) OWF participants determined not to be work eligible; and 2) individuals receiving benefits and services through the Prevention, Retention and Contingency (PRC) program.

2.1 How many CCMEP **required** participants will the Lead Agency serve annually?

Please provide the anticipated number of required individuals the Lead Agency will serve annually in CCMEP 300-450.

2.2 How many CCMEP participants will the Lead Agency serve annually?

Please provide the anticipated number of volunteers the Lead Agency will serve annually in CCMEP: We anticipate serving at least 1,600 youth per year.

2.3 How many CCMEP participants do you expect to be eligible for both TANF and WIOA funding?

Please provide the anticipated number of co-funded participants the Lead Agency will serve annually in CCMEP: We anticipate that 80% of the youth enrolled will be co-funded. _____

3. Coordination of Services

Coordination of services supports improved organization and integration of TANF and WIOA funded services. A Lead Agency can co-locate their staff with the other local participating agency at one location to help individuals' access services easier and more efficiently.

3.1 How is the Lead Agency meeting the needs of and engaging local businesses to provide employment and learning opportunities for program participants using the expertise of the Lead Agency, the local participating agency, and subcontractors as described in rule 5101:14-1-03 of the Administrative Code?

Describe:

The CCMEP Steering Committee and Coordinator work closely with the WDBCO Business Solutions staff to ensure that services and training opportunities are aligned with regional business needs. The CCMEP Coordinator will attend the Business Solutions committee meetings to share CCMEP program progress and elicit feedback on current labor needs, challenges, and opportunities.

FCDJFS coordinates with the People Works Initiative to coordinate job training efforts through the Franklin County Department of Economic Development and Planning. People Works facilitates training for low-income Franklin County residents who currently receive public assistance, matching the knowledge, skills, and abilities of individual public assistance recipients with the hiring needs of local partnering businesses and organizations.

We engage with key community stakeholders including business leaders, our OMJ center, and local training providers. Employers and workforce stakeholders are asked to identify their needs, issues, and challenges. This information is used to implement strategies that align CCMEP customer training with the needs of our local labor market.

3.2 How does the Lead Agency communicate and streamline processes between the Lead Agency, the local participating agency, and any subcontractors (e.g. summer employment services)?

Describe:

The Franklin County CCMEP Coordinator will facilitate bi-weekly meetings of our steering committee and monthly case management and supervisor meetings to ensure consistency between all partners and stakeholders. These partners and stakeholders include staff members from FCDJFS, the WDBCO, partnering agencies, and subcontracted providers. These meetings will be used to review and discuss policy, emergent issues, and to ensure that changes are communicated accurately and timely. Additionally, we will continue to facilitate community informational sessions with youth serving organizations for purposes of building awareness, soliciting input on service offerings and recruiting partner agencies.

Training will focus on the importance of maintaining proper documentation in OWCMS and CFIS Client Tracker, as well as administering or developing a comprehensive assessment and individual opportunity plan. Consistent and accurate collection of outcomes data from program participant follow-ups will be an additional training topic. FCDJFS will train and monitor youth employment providers to ensure adherence to documentation standards, wage management, service provision, and follow-up. Franklin County does not offer CCMEP stand alone summer employment.

4. Outreach, Referral, and Eligibility

4.1 What outreach activities are being conducted to identify individuals potentially eligible for CCMEP? Check all that apply.

- Social media (e.g., Facebook, Twitter, Snapchat, Instagram, YouTube, Secret, & Whisper)
- Brochures, posters, flyers
- OhioMeansJobs.com
- Digital banners
- Special events
- Radio
- Promotion through partners (e.g., schools, community centers, etc.)
- Other: _____

4.2 What is the referral process between the local participating agency and the Lead Agency?

The Lead Agency is responsible for developing an agreed upon referral process that takes place no later than 7 calendar days from when the determination is made that the individual is required or may volunteer to participate. A mandatory OWF participant shall be referred to CCMEP as described in paragraph (B)(2) of rule 5101:1-2-01 of the Administrative Code. This process should include confirmed contact(s) between each agency.

Describe:

FCDJFS will establish two primary means of community referrals:

First, entities contracting with FCDJFS or the WDBCO will be provided referral and reporting processes to be defined and stipulated. Participants expected to meet basic standards of eligibility will be referred by providers to the CCMEP case management team for a final eligibility determination and subsequent services.

We also intend to develop referral relationships with community organizations that serve or come into contact with the CCMEP target population. FCDJFS will conduct informational sessions for community leaders, detailing CCMEP services and providing direct lines for referrals. FCDJFS staff and contracted providers will be active throughout the community, engaging youth and accepting referrals. FCDJFS and our community partners are working with area youth to develop a portal and/or social media applications to make program information and services available in a means that is convenient and relatable. These platforms may also provide an avenue for self-referrals.

For OWF-eligible participants, prior to authorization, FCDJFS shall assess, appraise, and enter into a written agreement for each work-eligible individual, minor head of household and adult member of the assistance group, as set forth in rule 5101:1-3-11 of the Ohio Administrative Code. Within seven days of the OWF eligibility and assessment appointment, all OWF work-required applicants ages 14-24 will be referred to a CCMEP case manager to begin the comprehensive assessment and completion of an individual opportunity plan.

FCDJFS workforce staff will be responsible for ensuring that the receipt of cash assistance does not exceed the 36 month time limit as required by rule 5101:1-23-01 and the FCDJFS hardship policy. Workforce currently manages and tracks this data for all cash recipients.

4.3 Confirm that the Lead Agency has a process for working with the other local participating agency and/or any subcontractors to ensure the following:

- The Lead Agency has a process to share the number of months a program participant has participated in OWF that were subject to the time limit described in rule 5101:1-23-01 of the Administrative Code for inclusion in the IOP.

Describe:

Franklin County OWF participants enrolled in CCMEP, as well as all approved good cause and hardships cases, are managed by a team of six FCDJFS case managers, responsible for ensuring that these participants comply with the OWF time limit as described in rule 5101:1-23-01. An overview of the OWF requirements will be shared with all CCMEP case managers, WDBCO staff, and subcontracted providers during monthly training sessions.

- The Lead Agency has a process to screen, refer, and communicate about a program participant who is determined to be a victim of domestic violence, including modified hours of participation, waivers from requirements, referrals to counseling and other appropriate community resources, and protecting personal information.

Describe:

In accordance with 5101:1-3-20, if a customer discloses they are experiencing domestic violence during the initial eligibility interview, a referral e-mail is sent to a designated FCDJFS case manager who schedules the customer to complete a screening assessment. If the individual is determined to be a victim of domestic violence, the CCMEP worker meets with the participant and refers them to supportive services, counseling, offer waivers from work requirements, establishes optional monthly activities and as needed modified hours of participation. Once per month the participant meets with both the CCMEP and FCDJFS case managers to provide updates on their situation.

Additionally, the WDBCO has partnered with ADAMH (and their contracted service providers) to create a referral system for youth in need of comprehensive guidance and counseling. This may include drug and alcohol abuse counseling, domestic violence, traumatic events or medical issues, as well as referrals to other counseling as appropriate to the needs of the individual youth.

The participants' information is kept confidential and only service referrals are documented in CRIS-E and OWCMS.

- The Lead Agency has a process to communicate information regarding:
- CCMEP activities assigned for OWF work-eligible individuals;
 - OWF work-eligible individual's status changes, OWF recipient income information, FLSA hour maximums, good cause, OWF sanctions, compliance activity assignment and completion, hourly requirement updates (D3 status, exemptions, etc.), and other factors impacting CCMEP activity hours or OWF eligibility;
 - Verification and participation in CCMEP activities for OWF work-eligible participants;
 - Completion of the comprehensive assessment and IOP no later than 30 calendar days from the date of application for OWF;
 - Failure of an OWF work-eligible participant to comply with the terms of an IOP (within 10 calendar days of the failure);
 - OWF or Supplemental Nutrition Assistance Program recipients' information and acting upon it in accordance with rules 5101:1 and/or 5101:4 of the Administrative Code; and
 - Exiting an OWF work-eligible individual from CCMEP.

Describe:

A team of FCDJFS case managers is responsible for ensuring that CCMEP services are provided to OWF participants. CCMEP enrollment is mandated for all work-required OWF

participants that are minor head of households or ages 18-24. For all OWF work-required CCMEP participants, the individual opportunity plan will replace the self-sufficiency contract. Assignments, services and compliance information are updated in both OIES and OWCMS.

CCMEP activities assigned to OWF work eligible individuals are determined using household status and the FSLA calculator to determine the number of required hours to be completed. CCMEP participants are required to participate in assigned activities based upon the comprehensive assessment for no less than 20 hours per week. All assignment, compliance activity, completions and status changes are tracked in OWCMS and OIES.

OWF participants will receive CCMEP services and be engaged by a case manager no less often than every 30 days. Failure to comply with activities in the IOP without good cause may result in a sanction to cash benefits. CCMEP participants are offered three opportunities to comply with the IOP before adverse action is taken. CCMEP case managers continue to engage participants that have been sanctioned and assist the participant with the barriers that have led to noncompliance with their IOP. OWF participants will not be exited from CCMEP services until employment is acquired that moves them off of cash assistance.

FCDJFS CCMEP case managers collaborate with OWF staff to ensure case changes, sanctions, exemptions, and other factors are considered prior to assigning required activity hours. Their responsibilities extend to ensuring the verifications are submitted timely; failures are reported in accordance with rules 5101:1-3, 5101:1 and 5101:4.

- The Lead Agency has a process of notifying the new Lead Agency within 10 calendar days when a program participant moves to another county and it is in the best interest of the program participant to be served in the new county. OWF recipients must be transferred to a new county within 10 calendar days of the move.

Describe:

When a CCMEP participant notifies the FCDJFS CCMEP case manager, either verbally or in writing, that they have moved to a new county, the CCMEP case manager requests a new address and contact information. The participant is then given the option of remaining in the county of enrollment or transferring to their new county of residence. If the participant elects to transfer their case to the county of residence, OIES and OWCMS are updated with this information and the case is electronically transferred to the new county of residence. For OWF participants, the OIES case record and OWCMS record will be updated and the case transferred electronically through the intercounty transfer process within 10 days. An e-mail is then sent to CCMEP staff of the resident county for purposes of re-engagement and program continuity.

4.4 The Lead Agency must provide an assurance that it will comply with all requirements of the Americans with Disabilities Act (ADA) including that participants will have the right to request reasonable modification in CCMEP activities, including hours.

- The Lead Agency certifies compliance with ADA in accordance with rule 5101:9-2-02 of the Administrative Code and section 188 of WIOA.

4.5 Define how the Lead Agency forms a household based upon Title IV-A federal regulations and state law for income counting purposes for TANF funding eligibility for WIOA youth individuals and for the semi-annual process. (Please attach any related policies.)

Describe:

TANF ELIGIBILITY CRITERIA:

In Franklin County, to be eligible for CCMEP under TANF an applicant must meet all of criteria 1-5 and one bullet under #6:

1. Live in Franklin County;
2. Be between the ages of 16-24;
3. Be a US Citizen or Lawful Resident Alien (Documentation required if not a US Citizen)
4. Meet one of the definitions of Eligible Youth (see definition below);
5. Lives in a household that is considered to be a Needy Family (see definition below); and
6. The applicant or the household must contain one of the following:
 - a. A Minor Child (see definition below).
 - b. The parent, specified relative, legal guardian or legal custodian of a minor child;
 - c. A non-custodial parent who lives in the state, but does not reside with his/her minor child(ren);
 - d. A pregnant individual; or
 - e. An individual age 18 to 24 that is part of a family that includes a minor child.

NOTE: An applicant MUST complete JFS 03002 to document eligibility.

Definitions:

Minor Child: A minor child is defined as an individual who is less than eighteen years of age (whether he/she attends school or not) or an individual who is eighteen but not yet nineteen years of age and is a full-time student in a secondary school (or in the equivalent level of vocational or technical training).

Eligible Youth: An interested applicant must meet one of the following definitions:

- A. A Minor Child (see above definition); or
- B. An individual between the ages of 16-24 that is pregnant (medically verified) with no other minor children; or
- C. An individual between the ages of 16-24 that is a parent, specified relative, legal guardian or legal custodian of a minor child; or
- D. An individual between the ages of 16-24 that is a non-custodial parent of a minor child (the child does not live with the parent but must live in the State of Ohio); or
- E. An individual between the ages of 16-24 that resides in the household with a minor child that is not their own minor child. This may include familial or non-familial legal arrangements, informal arrangements, and/or individuals considered "doubled up"(temporarily living at an address); or
- F. An individual between the ages of 16-24 who has a minor child and is considered Homeless
- G. An individual between the ages of 16 to 17 years of age or 18 years of age if they are a full time student in a secondary school who is in Foster Care (only the youth's income is counted in these situations).

Needy Family: A family unit containing a minor child, an applicant who is at least 6-months pregnant (medically verified) without any other minor child or an applicant who is a non-custodial of a minor child living in the State of Ohio, residing at one address that has a household income of at or below 200% of the Federal Poverty Level (FPL).

Note: FCDJFS acknowledges that multiple families may reside at one address.

Specified Relative: Any of the following who is age 18 or older and caring for a minor child in place of the parents **and** can verify the relationship:

- Individuals related by blood or adoption: parent, grandparent, sibling, aunt, uncle, niece, nephew or cousin
- Stepparents and stepsiblings
- Spouses of any person named above, even though the marriage has ended in death, separation or divorce

CALCULATING INCOME:

When calculating income you must include all non-excludable earned and unearned income. However, the age of the applicant and the household composition dictates whose income must be included when determining whether the household meets the income threshold for TANF eligibility. See below for details:

Income is NOT counted for:

- Minor children- this includes a minor child who is pregnant, who is a custodial or non-custodial parent of their own minor child.

- Minor Children in Foster Care (and their Foster Parents) are exempt from an income requirement with proper documentation from the local public children services agency-PSCA.

Income IS counted for: (income must be counted for every scenario that applies)

- A. The adult(s) acting in the capacity of a parent, specified relative, legal guardian, custodian or head of household shall be counted when:
 - The CCMEP applicant is a minor child, even if the minor child is pregnant or has a minor child of their own
- B. An applicant who is pregnant, when they are:
 - At least age 18 and over and out of school; and
 - Is pregnant (medically verified if they do not any other minor children of their own).
- C. The spouse of a pregnant applicant if they live in the same household as the applicant and are at least age 18 and out of school.
- D. An applicant who is the custodial parent of a minor child of their own and is at least age 18 and out of school. (A custodial parent who is a minor does not have to count their income but the income of the adult as described in A. must be counted)
- E. The spouse or significant other of a custodial parent applicant if they live in the same household as the applicant and is at least age 18 and out of school.
- F. An applicant who is a non-custodial parent when they are:
 - At least age 18 and out of school
- G. An applicant who is considered homeless and has a minor child of their own – only their income, if age 18 and above and out of school. No other person's income should be counted

Additional Notes:

- Multiple “families” may reside at one household. Calculate the income based only on those individuals who make up the “family unit” of the individual applying for services, not all members of all family units living at the same address.
- Written verification of household composition may be provided by self-attestation.

4.6 Confirm that the Lead Agency forms a family for income counting purposes for WIOA funding eligibility based upon the definition in paragraph (A)(5) of rule 5101:10-3-01 of the Administrative Code.

- FCDJFS forms a family for income counting purposes for WIOA funding eligibility based upon the definition in paragraph (A)(5) of rule 5101:10-3-01 of the Ohio Administrative Code.

5. CCMEP Comprehensive Assessment and Individual Opportunity Plan (IOP)

5.1 Describe the Lead Agency’s process for the CCMEP Comprehensive Assessment.

Describe:

WIOA and TANF CCMEP participants will complete a comprehensive assessment (JFS-3003) within 30 days of enrollment in CCMEP. Our standardized assessment tool includes basic and

occupational skills, prior work history, employability, interests, aptitudes, and supportive service or developmental needs. The tool identifies employment and educational barriers of CCMEP participants, as well as non-employment and education-related needs. The assessment also includes questions relating to occupational skills, prior work experience, employability, interests, aptitudes, supportive service needs and developmental needs.

The initial Individual Opportunity Plan (JFS- 3004) is developed based on the comprehensive assessment and completed within 30 days of enrollment. The IOP describes the services and activities required from the selection of the 14 Core Elements made available to each participant. The IOP will be updated as needed (or as new services are made available) and tracked for progress. Both documents are signed within 30 days by the enrolled CCMEP participant. Both the comprehensive assessment and IOP will be documented in OWCMS .

5.2 What basic skills assessment does the Lead Agency use?

- WorkKeys®
- Basic English Skills Test (BEST)
- Comprehensive Adult Student Assessment Systems (CASAS)
- General Assessment of Instructional Needs (GAIN)
- Massachusetts Adult Proficiency Test (MAPT)
- Test of Adult Basic Education (TABE®)
- Standardized tests – secondary school students only
- Other formalized testing instruments to measure skills-related gains (Specify below).

Describe:

FCDJFS will utilize the BEST and TABE test for newly enrolled out-of-school participants. For in-school youth, standardized secondary test results will be also accepted. Results of other tools that meet the assessment criteria will be accepted if the test results are no more than six months old. No retesting shall be necessary under these circumstances.

5.3 Confirm that the Lead Agency has a process to ensure IOPs are developed with participants based on their needs and revised with updates when necessary.

- The Lead Agency has a process to ensure IOPs are developed with program participants based on their needs and revised with updates when necessary.

5.4 Describe how the Lead Agency ensures that case managers engage with program participants at least once every 30 days and keep them engaged.

Describe:

Franklin County CCMEP case managers and subcontracted staff are expected to contact and check in on enrolled participants no less often than every 30 days. Case managers must document their activities and interactions with enrolled participants in OWCMS case notes. All contacts and or attempted contacts are recorded and maintained in OWCMS and participant case files. FCDJFS will request a standardized report to be made available in BIC COGNOS that details the last date of contact for enrolled participants to ensure contact frequency.

6. Program Services

The Lead Agency, in collaboration with the local board, must ensure that the 14 CCMEP services are available to program participants.

6.1 Provide a brief description of how the CCMEP services are made available to program participants and indicate how each service is designed to reasonably meet a TANF purpose(s).

1. **TANF Purpose 1** - Provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives
2. **TANF Purpose 2** - End the dependence of needy parents on government benefits by promoting job preparation, work, and marriage
3. **TANF Purpose 3** - Prevent and reduce the incidence of out-of-wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies
4. **TANF Purpose 4** - Encourage the formation and maintenance of two-parent families

1. Tutoring, study skills training, instruction and dropout prevention – TANF Purpose(s) 1, 2

Describe:

FCDJFS, in collaboration with the WDBCO, will contract with community-based organizations to provide tutoring, study skills training, instruction, and dropout-prevention services. These services will be made available to each participant based on their individual needs, as detailed in their Individual Opportunity Plan (IOP). The program narratives submitted from each organization will specify the process of service delivery, as well as how the services align with TANF Purposes 1-2, providing support for needy families and workforce development.

2. Alternative secondary school services/dropout recovery services – TANF Purpose(s) 1, 2

Describe:

FCDJFS, in collaboration with the WDBCO, will contract with community-based organizations to provide alternative secondary school services or dropout recovery services. Services will be made available to each participant based on their individual needs, as detailed in their Individual Opportunity Plan (IOP). The program narratives submitted from each organization will specify the process of service delivery, as well as how the services align with TANF Purposes 1-2, providing support for needy families and workforce development.

3. Paid and unpaid work experience (with an academic and occupational education component) – TANF Purpose(s) 1, 2

Describe:

FCDJFS, in collaboration with the WDBCO, will contract with community-based organizations to provide paid and unpaid work experience (with an academic and occupational education component). Services will be made available to each participant based on their individual needs, as detailed in their Individual Opportunity Plan (IOP). The program narratives submitted from each organization will specify the process of service delivery, as well as how the services align with TANF Purposes 1-2, providing support for needy families and workforce development.

4. Occupational skill training – TANF Purpose(s) 1, 2

Describe:

FCDJFS, in collaboration with the WDBCO, will contract with community-based organizations to provide occupational skill training. Services will be made available to each participant based on their individual needs, as detailed in their Individual Opportunity Plan (IOP). The program narratives submitted from each organization will specify the process of service delivery, as well as how the services align with TANF Purposes 1-2, providing support for needy families and workforce development.

5. Education offered concurrently with workforce preparation – TANF Purpose(s) 1, 2

Describe:

FCDJFS, in collaboration with the WDBCO, will contract with community-based

organizations to provide education offered concurrently with workforce preparation. Services will be made available to each participant based on their individual needs, as detailed in their Individual Opportunity Plan (IOP). The program narratives submitted from each organization will specify the process of service delivery, as well as how the services align with TANF Purposes 1-2, providing support for needy families and workforce development.

6. Leadership development opportunities – TANF Purpose(s) 1, 2

Describe:

FCDJFS, in collaboration with the WDBCO, will contract with community-based organizations to provide leadership development opportunities. Services will be made available to each participant based on their individual needs, as detailed in their Individual Opportunity Plan (IOP). The program narratives submitted from each organization will specify the process of service delivery, as well as how the services align with TANF Purposes 1-2, providing support for needy families and workforce development.

7. Supportive services – TANF Purpose(s) 1, 2

Describe:

FCDJFS, in collaboration with the WDBCO, will contract with community-based organizations to provide supportive services. Services will be made available to each participant based on their individual needs, as detailed in their Individual Opportunity Plan (IOP). The program narratives submitted from each organization will specify the process of service delivery, as well as how the services align with TANF Purposes 1-2, providing support for needy families and workforce development.

8. Adult mentoring – TANF Purpose(s) 1, 2

Describe:

FCDJFS, in collaboration with the WDBCO, will contract with community-based organizations to provide adult mentoring. Services will be made available to each participant based on their individual needs, as detailed in their Individual Opportunity Plan (IOP). The program narratives submitted from each organization will specify the process of service delivery, as well as how the services align with TANF Purposes 1-2, providing support for needy families and workforce development.

9. Follow-up services for not less than 12 months – TANF Purpose(s) 1, 2

Describe:

FCDJFS, in collaboration with the WDBCO, will contract with community-based organizations to provide follow-up services for not less than 12 months. Services will be made available to each participant based on their individual needs, as detailed in their Individual Opportunity Plan (IOP). The program narratives submitted from each organization will specify the process of service delivery, as well as how the services align with TANF Purposes 1-2, providing support for needy families and workforce development.

10. Comprehensive guidance and counseling – TANF Purpose(s) 1, 2

Describe:

FCDJFS, in collaboration with the WDBCO, will contract with community-based organizations to provide comprehensive guidance and counseling. Services will be made available to each participant based on their individual needs, as detailed in their Individual Opportunity Plan (IOP). The program narratives submitted from each organization will specify the process of service delivery, as well as how the services align with TANF Purposes 1-2, providing support for needy families and workforce development.

11. Financial literacy education – TANF Purpose(s) 1, 2

Describe:

FCDJFS, in collaboration with the WDBCO, will contract with community-based organizations to provide financial literacy education. Services will be made available to each participant based on their individual needs, as detailed in their Individual Opportunity Plan (IOP). The program narratives submitted from each organization will specify the process of service delivery, as well as how the services align with TANF Purposes 1-2, providing support for needy families and workforce development.

12. Entrepreneurial skills training – TANF Purpose(s) 1, 2

Describe:

FCDJFS, in collaboration with the WDBCO, will contract with community-based organizations to provide entrepreneurial skills training. Services will be made available to each participant based on their individual needs, as detailed in their Individual Opportunity Plan (IOP). The program narratives submitted from each organization will specify the process of service delivery, as well as how the services align with TANF Purposes 1-2, providing support for needy families and workforce development.

13. Labor market and employment information – TANF Purpose(s) 1, 2

Describe:

FCDJFS, in collaboration with the WDBCO, will contract with community-based organizations to provide labor market and employment information. Services will be made available to each participant based on their individual needs, as detailed in their Individual Opportunity Plan (IOP). The program narratives submitted from each organization will specify the process of service delivery, as well as how the services align with TANF Purposes 1-2, providing support for needy families and workforce development.

14. Post-secondary preparation and transition activities – TANF Purpose(s) 1, 2

Describe:

FCDJFS, in collaboration with the WDBCO, will contract with community-based organizations to provide post-secondary preparation and transition services. Services will be made available to each participant based on their individual needs, as detailed in their Individual Opportunity Plan (IOP). The program narratives submitted from each organization will specify the process of service delivery, as well as how the services align with TANF Purposes 1-2, providing support for needy families and workforce development.

6.2 The Lead Agency must provide an assurance that TANF or WIOA funds are not used to pay a program participant directly for subsidized employment by the local participating agency as either a Lead Agency or as a service provider.

- The Lead Agency certifies that it does not use TANF or WIOA funds to pay a program participant directly for subsidized employment by the local participating agency as either a Lead Agency or as a service provider. Provide a description of how participants will be compensated for subsidized employment:

Describe:

Subcontracted providers or a third-party payroll company will be used to pay participants directly for subsidized employment in accordance with 5101-14-1-03 (C) (15).

6.3 Provide a description of the supportive services that the Lead Agency makes available to program participants and attach local policies on supportive services:

Describe:

The following is our supportive services policy:

Supportive services are intended to reduce barriers and enable participants to participate in CCMEP and to secure and retain education and/or employment and may include but are not limited to linkages, referrals, or help with:

- Access to community services;
- Access to health care;
- Transportation;
- Child care;
- Housing;
- Uniforms, work attire and work-related tools;
- Educational testing, excluding ITAs and related services. (For example, GED and basic certifications are not supportive services.);
- Books, fees, school supplies, and other necessary items for students enrolled in postsecondary education classes;
- Reasonable accommodations for youth with disabilities;
- Needs-related payments; and
- Legal services, including but not limited to access to driver's licenses, expunging criminal records, or resolving issues with debt, credit, and housing.

Supportive services provide non-recurrent, short-term benefits that:

1. Are designed to deal with a specific crisis situation or episode of need;
2. Are not intended to meet recurrent or ongoing needs; and
3. Will not extend beyond four months.
4. May address needs identified in a CCMEP participant's assessment or Individual Opportunity Plan.

The Director of the WDBCO, or his/her designee or the FCDJFS CCMEP Case Manager Supervisor should be informed and approve supportive services spending in excess of \$5000.

Supportive services do not include work subsidies.

WIOA and TANF funding can be used to provide supportive services.

Supportive services for participants who are receiving OWF or are working would not be considered TANF assistance.

6.4 Provide a description of the follow-up services that the Lead Agency makes available to program participants including documentation requirements when a program participant cannot be located or contacted or requests to opt out or discontinue follow-up services:

Describe:

The following is our Follow-up Services policy:

Follow-up services ensure job retention and/or successful participation in post-secondary education and training.

Program participants must be informed at the time of enrollment that follow-up services will be provided for a minimum duration of twelve months following program exit. Every effort is made to dually enroll participants in WIOA and TANF funded services. Should a participant no longer meet the TANF eligibility guidelines, follow-up services will be provided utilizing WIOA funds. Follow-up services may be provided beyond 12 months at the discretion of the lead agency.

Follow-up services are informed by the individual opportunity plan (IOP) in effect upon exit and may vary depending on the needs of individual program participants. These services are

intended to provide the necessary support to ensure the program participant's post-program success, including but not limited to:

- Supportive services;
- Regular contact with program participants and their employers, including assistance addressing work-related problems;
- Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area such as career awareness, counseling, and exploration services;
- Financial literacy education;
- Adult mentoring;
- Activities that help the program participant prepare for and transition to post-secondary education; and
- Other CCMEP services, as needed.

Follow-up services must include more than only a contact attempted or made for securing documentation in order to report a performance measure.

All program participants receive some form of follow-up services for a minimum duration of twelve months unless the participant declines to receive follow-up services or the participant cannot be located or contacted. Unsuccessful attempts to contact CCMEP program participants are documented in the Ohio Workforce Case Management System (OWCMS); case managers will continue efforts to contact program participants no less frequently than once per month for a period of three months. Requests to opt out or discontinue follow-up services are also documented in OWCMS.

6.5 Describe the timeframes and documentation requirements the Lead Agency uses to determine good cause for OWF work-eligible CCMEP program participants.

Describe:

Our CCMEP program allows enrolled CCMEP OWF participants no more than 10 days from the date of request to provide good cause verification in accordance with 5101-1-3-13. Verification can be provided in person, via email, fax or through an authorized representative.

6.6 What is the process for providing a program participant with written notice of scheduled CCMEP appointments?

Describe:

CCMEP staff will provide a minimum of 5 days written notification prior to a scheduled appointment. Franklin County shall allow notifications to be made via US mail or a text message if an agreement is signed by participant allowing for the receipt of text messages.

6.7 For program participants without a high school diploma, how will the Lead Agency ensure those individuals are made aware of options to obtain their high school degree or its equivalent (e.g., ABLE referral, Adult Diploma option)?

More than 1 million adult Ohioans do not possess a high school diploma or equivalent. Addressing this issue is critical to Ohio's economic health and growth. Attainment of this credential is one of the primary measures for CCMEP and an important priority for the program.

Describe:

It is important that every youth obtain a high school diploma or equivalent. As part of their IOP, youth will be encouraged to obtain their diploma or GED while engaged in work-readiness training. The WDBCO has an ASPIRE instructor located at the OhioMeansJobs center and FCDJFS has located a third party to provide GED preparation online, ensuring that all youth are provided means of obtaining a high school equivalence diploma. The WDBCO, in partnership with Franklin County Children Services, will be conducting a graduation inventory with each youth enrolled in the CCMEP in-school youth program. The graduation inventory will consist of reviewing each participant's academic progress, attendance, electives, test scores and occupational outlook to create a customized graduation plan.

6.8 Describe the Lead Agency's role in the design of the CCMEP services procured through the workforce development board including collaboration and co-funding.

Describe:

Please refer to section 1.6

We are coordinating efforts to procure, contract and manage WIOA and TANF programming and strong CCMEP service delivery system for local youth-serving organizations. The intent is to integrate service delivery, including the WIOA 14 elements and TANF participation requirements.

We have already drafted and released a joint TANF and WIOA procurement for out-of-school CCMEP services. This joint procurement creates a robust service delivery system with standardized policies, reporting, and performance metrics. The two entities also worked cooperatively on the release of and procurement relating to the 2017 TANF – Ohio Youth Works Program and the WIOA Summer Internship Program.

6.9 Confirm that the Lead Agency is not utilizing Prevention, Retention, and Contingency (PRC) funding for CCMEP program participants.

Yes, the Lead Agency is not utilizing PRC funding for CCMEP program participants.

7. Case Management

Case managers and their efforts to build relationships with program participants are the key to the success of CCMEP and program participants' outcomes.

7.1 What case management training has or will the Lead Agency require for CCMEP case managers?

Describe:

FCDJFS requires all case managers to attend OWCMS, CFIS Client Tracker, trauma-informed care, customer service, and all other ODJFS case management training.

7.2 What is the average caseload size for CCMEP case managers?

- | | |
|---|---|
| <input type="checkbox"/> 15 cases or less | <input type="checkbox"/> Between 50 and 100 cases |
| <input type="checkbox"/> Between 15 and 25 cases | <input type="checkbox"/> 100 cases or more |
| <input checked="" type="checkbox"/> Between 25 and 50 cases | <input type="checkbox"/> Other: |

7.3 What process does the Lead Agency use for program participant feedback and how will the Lead Agency utilize this information for ongoing improvements?

Describe:

FCDJFS will utilize program participant feedback surveys, to be made available in paper and electronic formats. The survey will assist Franklin County in benchmarking all aspects of the participant experience. The survey results will be analyzed for trends, effective system and service delivery approaches, and desired outcomes. The feedback process will also include focus groups with participants on newly-proposed system or service changes prior to implementation.

7.4 What process does the Lead Agency use for case manager's feedback and how will the Lead Agency utilize this information for ongoing improvements?

Describe:

FCDJFS will utilize case manager feedback surveys, to be made available in paper and electronic formats. The survey will assist Franklin County in benchmarking all aspects of the case management experience. The survey data will be analyzed for trends, effective system and service approaches and desired changes. Prior to implementing newly proposed system or services modifications, the changes will be reviewed and discussed with CCMEP case manager staff.

8. Performance Measures

A key feature of CCMEP is strengthened accountability through the establishment of a single Lead Agency responsible for meeting common outcome measures and performance goals.

8.1 How will the Lead Agency collect and report any supplemental data to be included?

In addition, ODJFS also matches case records with data from various sources. Some post-exit program participant accomplishments (e.g., degree attainment) may not be captured this way.

Describe:


FCDJFS will collect and report information through OWCMS, agency databases, and electronic survey tools or reports. All supplemental data and documents, including participant follow-up information, shall be scanned into the participant's OWCMS record and stored in the participant file.

CCMEP Plan Certification

Please provide the name, title, and signature of the administrator, director or executive director of the CCMEP Lead Agency:

Name and Title	
Signature	Laura Repasky 

Please provide the name, title, and signature of the chairperson of the local workforce development board (or the chairperson's designee):

Name and Title	Lisa Patt-McDaniel, Chief Executive Officer, Workforce Development Board of CO	
Signature		Date December 17, 2020

Appendix A
Conflicts of Interest

CCMEP service providers must maintain a conflict of interest policy requiring disclosure and reassignment where participants are found to have a personal or business relationship with a case manager employed by said provider. Providers are expected to enforce both the letter and spirit of this policy, identifying actual or perceived conflicts of interest, disclosing conflicts, and reassigning participants in the event of future conflicts. Disclosure and/or reassignment should occur at the earliest possible time and, if possible, prior to the provision of CCMEP services.

Comprehensive Case Management Employment Program

Conflict of Interest Disclosure Form

INSTRUCTIONS

Please complete this form for yourself and for all members of your immediate family or household for whom it would be appropriate.

NAME: _____

Relationship to CCMEP

POSITION: _____

Current Board Memberships

List all the boards of any voluntary organizations on which you or family/household members are currently a member.

	Organization	Self or family/household member
1.	_____	_____
2.	_____	_____
3.	_____	_____
4.	_____	_____

CURRENT VOLUNTEER SERVICES WITH FRANKLIN COUNTY DEPARTMENT OF JOB AND FAMILY SERVICES (FCDJFS) OR THE WORKFORCE DEVELOPMENT BOARD OF CENTRAL OHIO (WDBCO)

List all current volunteer services in which you or family/household members are currently involved with FCDJFS or WDBCO partners and/or funded programs.

	Organization/Program	Self or family/household member
1.	_____	_____
2.	_____	_____
3.	_____	_____
4.	_____	_____

BUSINESS OR PROFESSIONAL INTERESTS

Are you or family/household members an officer, director, trustee, or majority owner of a for-profit organization that directly or indirectly furnishes or facilitates the provision of goods or services to FCDJFS or the WDBCO? List any organizations in which you or family/household members are employed or have any financial interests, direct or indirect, that currently conduct business with FCDJFS or the WDBCO?

	Organization	Self or family/household member
1.	_____	_____
2.	_____	_____
3.	_____	_____
4.	_____	_____

ACKNOWLEDGMENT

Federal regulation 2 CFR 200.318(c)(1) requires that any potential conflict of interest be disclosed in writing. Such a conflict of interest would arise when a CCMEP service provider, officer, or agent; any member of his or her immediate family; his or her partner; or any organization which employs or is about to employ any of the parties indicated herein has a financial or other interest in or a tangible personal benefit from a firm considered for a contract.

I have not solicited or accepted gratuities, favors, or anything of monetary value from contractors or parties to contractors except as disclosed above. By signing this document I am affirming that I have been given the FCDJFS and WDBCO Conflict of Interest form and am familiar with its contents. I am also affirming that the knowledge contained in this disclosure statement is accurate to the best of my knowledge. I agree that as my circumstances change, I will promptly notify FCDJFS/WDBCO and update this disclosure statement.

SIGNATURE: _____ **DATE:** _____

This information will be considered confidential and kept on file by the FCDJFS Deputy Director of Workforce Development, subject to review by the Director of FCDJFS.

I. Background

A. CCMEP

5101:14-1-01 Comprehensive Case Management and Employment Program: Definitions

(FF) "Work experience" means a CCMEP service that is a planned, structured learning experience that takes place in a workplace for a limited period of time.

5101:14-1-02 Comprehensive Case Management Employment Program: General

(E) What are the services that shall be made available to each program participant?

- (3) Paid and unpaid work experiences that have academic and occupational education as a component of the work experience, which may include the following types of work experiences:
 - (a) Summer employment opportunities and other employment opportunities available throughout the school year;
 - (b) Pre-apprenticeship programs;
 - (c) Internships and job shadowing;
 - (d) On-the-job training opportunities;

B. CCMEP Work Experience

Work experience functions as a workplace-based activity for acquiring of behavioral competencies and specific occupation or job skills. The primary intent of work experience is to provide CCMEP participants with opportunities for career exploration and skill development to gain work readiness skills in preparation for employment. A likely candidate for work experience is a participant who is appropriate for long term employment in a particular industry or occupation, but does not have all of the skills or the experience to qualify for entry-level employment in the field.

Work experience may be conducted in the private-for profit, private non-profit and public sectors. It must be clearly distinguishable from public service employment, a prohibited activity under the WIOA. Although a business, public agency or non-profit (hereafter collectively referred to as "work experience provider") may also receive some benefit from work experience in the form of work being done or recruiting a potential new employee, the primary goal of work experience is to benefit the participant. Work experience may be combined with classroom instruction relating to a particular position, occupation, industry or basic skills and abilities to successfully compete in the local labor market.

Work experience may be paid or unpaid. Unpaid work experience may include job shadowing where a participant experiences the work environment to increase career awareness, observe models of behavior on the

job through examples, and receives help in making career decisions. Job shadowing is limited and allows participants to observe only. Unpaid work experiences should be assigned sparingly.

Service providers are encouraged to seek employer paid work experiences. If the opportunity is not available CCMEP funding may be used. CCMEP paid work experience for In-School youth may not exceed 480 hours annually. Out-of-School youth paid work experience may not exceed 480 hours.

C. Work Experience/ Worksite Agreement

The agreement is a written document that details terms and conditions of paid and unpaid work experience and the expectations of the parties to the agreement, including the participant's wage per hour and maximum hours to be worked. The written agreement is between the CCMEP participant, the site employer or host site, and the provider of career services.

The written agreement, which may be called a worksite agreement, job site agreement, or host site agreement must include at a minimum: the duration, remuneration, tasks, duties, supervision, health and safety standards and other conditions of work experience such as consequences of not adhering to the agreement and a termination clause. The worksite or host site entity, the participant and the provider of career services should all be given a copy of the agreement. The agreement must be available for audit and monitoring purposes

The same health and safety standards otherwise applicable to working conditions of employees apply to working conditions of CCMEP participants.

The state workers' compensation law may or may not apply to a participant in work experience depending on the work experience arrangements and employer's benefits. If the state workers' compensation law does not apply to a participant in work experience, FCDJFS or the WDBCO must secure insurance coverage for injuries suffered by the participant in work experience.

Attention must be given to ensure that work experience arrangements do not unfavorably impact current employees and do not impair existing contracts for services or collective bargaining agreements. Work experience, including internships, in the private for-profit sector must be structured so as not to appear to be subsidizing private for-profit operations. The work of the participant should not materially impact the profit margin of a private-for-profit company.

D. Documentation

Documentation of the work experience must be maintained in OWCMS and the participant's file. At a minimum, the following documents should be included:

- An assessment and IOP indicating a need for work experience;
- A copy of the agreement between the participant, the worksite or host site including any attachments to the agreement, such as a training plan;
- Time sheets, attendance sheets and performance records, as appropriate; and

E. Monitoring

FCDJFS and the WDBCO are responsible for ensuring oversight of the program and must periodically monitor the CCMEP participant and the worksite or a host site to ensure that goals are being met and adherence to this policy and other applicable regulations.

Through the state's monitoring system, program monitors will review the local area's use of work experience, including a participant file review, during the annual onsite monitoring review for compliance with federal and state laws and regulations.

F. Definitions

- a.** Employee: CCMEP participants engaged in the primary operations of the work experience provider and performing productive work (for example, filing, performing other clerical work, or assisting customers) should be considered employees subject to minimum wage and overtime provisions of the Fair Labor Standards Act.
- b.** Employer: If the work experience provider is relying on the CCMEP participant to perform real work, i.e., to be productive, then the situation should be recognized as an employer-employee relationship. In this situation, the site employer is the employer of record and participants must receive no less than the applicable state or federal minimum wages, related benefits are required and payroll taxes should be deducted. The employer of record will be responsible for paying all taxes and providing similar benefits as are available to other employees.
- c.** Internship: A system of gaining on-the-job experience by placement in a work environment for a period of time with the goal to build technical and job awareness skills. Internships may be paid or unpaid.
- d.** Job shadowing: A short-term unpaid activity which introduces a participant to the workplace and provides exposure to occupational areas of interest to increase career awareness.
- e.** Provider of career services: The contracted provider of career services has the option of being the employer of record for the CCMEP participant. The employer of record is responsible for paying the participant and negotiating with the host site the activities that will be performed by the participant. The work experience may occur at the provider of career services, service provider, or employer location or the participant may be referred to a host site to receive the work experience. The host site is the location where work experience tasks will occur.
- f.** Public service employment: Work normally provided by governments that includes, but is not limited to, work in fields of human betterment and community improvement, child care, health care, education, crime prevention, public transportation, streets and parks, solid waste removal, housing and neighborhood improvement, rural development, etc.
- g.** Trainee: CCMEP participants engaged in a training experience similar to a vocational school, even though it may include actual operation of the facilities of the work experience provider, are not subject to FLSA minimum wage and overtime provisions. Training must primarily benefit the participant by way of experience; the work experience provider must derive no immediate or significant advantage. Regular employees may not be displaced, the experience must be closely supervised, trainees are not guaranteed a job at the conclusion of the experience, and there must

be a mutual understanding between the CCMEP participant and work experience provider that the participant is not entitled to wages in exchange for their time.

- h.** Work experience: A planned, structured learning activity based on the identified needs of the CCMEP participant that takes place in a workplace setting for a limited period of time. Use of work experience situation must be based on an assessment and identified on the participant's assessment and individual opportunity plan (IOP). Work experience must include academic and occupational education. Work experiences are based on a contractual relationship between the CCMEP service provider, work experience employer, and work experience participant. A work experience must not be designed to replace an existing employee or position. Wages are provided by the CCMEP service provider and paid directly to the participant, developing an employer/employee relationship between the service provider and the work experience participant that gives rise to applicable labor standards under the Fair Labor Standards Act. Employers are not monetarily compensated. Work experience is paid or unpaid and may include, but is not limited to internship and job shadowing.

II. Resources and References

Work Experience activities shall adhere to the following rules and regulations:

OWF – OAC 5101:1-3-12.3

WIOA – Policy Letter No. 15-12

20 CFR 681.600

20 CFR 680.840

ORC 5107.54

OAC 5101:1-3-12

OAC 5101:1-3-12.3

5101:14-1-01

5101:14-1-02

OAC 5101:14-1-05

Definition of Individual Training Accounts:

ITAs are established on the behalf of CCMEP participants to finance training from eligible providers selected in consultation with the case manager. Costs must be reasonable and necessary, representing a sound investment of public funds.

ITA expenditures are costs required by the training institution to complete the training. For example, tuition may include books or tools. Supportive Services may be provided to the CCMEP participant to cover the cost of books or tools not included as part of the ITA expenditures.

Policy:

ITAs provide a financing mechanism for participants deemed by their case manager to be unlikely or unable to obtain or retain employment that leads to self-sufficiency or higher wages through career services, alone. ITA financing is limited by cost and duration. Financed training should result in employment leading to economic self-sufficiency.

Out-of-school youth participants ages 18-24 may receive an ITA to access occupational skill training leading to recognized postsecondary credentials, industry recognized credentials, employment, and measurable skill gains toward credentials or employment (OAC 5101:14-1-01 (M)). Out-of-school youth ages 16-17 are eligible for ITA funding upon completion of a high school diploma or GED.

ITA funding for training is limited to participants who:

- Complete a comprehensive assessment and an IOP that identifies the selected training course;
- Select training programs that are directly linked to an in-demand industry sector or occupation or sectors that have a high potential of sustained demand or growth in the local area or in the planning region or in another area in which the participant is willing to travel or relocate (WIOA Section 134 (c) (3) (G) (III); and OAC 5101:14-1-01 (K)); and
- Comply with CCMEP requirements including continued participation up to employment and throughout the retention period; and
- Maintain satisfactory performance or grades throughout the training program.

Coordination of CCMEP Training Funds and Other Federal Assistance (20 CFR 680.230):

WIOA funds are intended to provide training services in instances when there is no grant assistance or insufficient assistance from other sources including but not limited to: Temporary Assistance for Needy Families (TANF); Basic Food Employment & Training (BFET); Title IV Programs such as Federal Pell Grants, Academic Competitiveness Grants, National SMART Grants, Federal Supplemental Educational Opportunity Grants, or Federal Work-Study; GI Bill or other Federal financial aid available to military veterans; and state-funded grants such as the Ohio State Need Grant to pay for those costs.

Case managers must consider and document in the participant file the availability of other sources of grants, excluding loans, to pay for training costs so that CCMEP funds are used to supplement but not supplant other sources. The use of CCMEP funds to make payments towards a personal loan of an otherwise eligible participant is prohibited. However, the mere existence of a federal loan, regardless of the status, must not impact ITA eligibility determinations.

In-Demand Occupations:

To receive an ITA, a participant must select a training program that is directly linked to employment that is in high demand.

State In-Demand Occupations (85 Percent)

Each program year, at least 85 percent of new local ITA enrollment must be in an "in-demand" occupation as defined by the state of Ohio. Participants who have a current program year training service start date and whose ITA will carry into the next program year will not be counted in the next program year's percentage.

The link below provides access to In-Demand occupation data:

<http://jfs.ohio.gov/owd/OMJResources/In-DemandOccupations.stm>

Local Area In-Demand Occupations (15 Percent)

The remaining 15 percent of new local ITA enrollments may be for occupations defined as in-demand by the Workforce Development Board of Central Ohio. Some examples of local In-demand occupations may include, but are not limited to:

- An occupation in a geographic area in which the participant is willing to work or relocate;
- Employment associated with the regional industry sector or career pathway consortium for workforce development; and
- A written guarantee of a bona fide job upon completion of training.

Appropriate documentation must be maintained in the case files.

Waiver Request

Waivers may be requested by the CCMEP lead agency, in consultation with the Workforce Development Board of Central Ohio, to exceed the 15 percent enrollment requirement. Waivers are approved on a case by case basis. The waiver template must be completed, providing the appropriate justification for the waiver and be submitted to wiaqna@jfs.ohio.gov. The subject of the email should read, "ITA Waiver Request".

Workforce Inventory of Education & Training (WIET) list:

Training programs may only be selected from the approved Workforce Inventory of Education & Training (WIET) list and must lead to an "occupation in demand" in the local area or areas where the participant is willing to relocate. The participant will have access to a list of eligible training providers. Participants must be able to use their ITA to procure services from any eligible training provider on the local/state list.

The link below provides access to Ohio's Workforce Inventory of Education and Training (WIET):
<https://owcms.ohio.gov/wiet/index.xhtml>

Maximum Duration of an ITA:

The duration of an ITA is determined by a participant's career pathway and the training and services necessary to meet the participant's goal based on their assessment and IOP. Generally, training is either short-term or long-term.

Short-term training is completed in 12 months or less. Short-term training is the preferred method since the goal is to attain employment quickly. Short-term prevocational services include development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct to prepare individuals for unsubsidized employment or training.

Long-term training requires longer than 12 months to complete, but must not exceed 24 months (12 months for OWF recipients). Four-year degree programs may be funded when the participant can document that he or she is in the last two years of the program (e.g., remaining hours are equal to or less than 50 percent of the total credit hours required for the degree) and is in an in-demand occupation.

Extensions

An ITA may be extended if a participant is unable to complete the training program within the agreed-upon time frame.

These include but are not limited to:

- Military service or leave time;
- Lack of availability of classes;
- Cancellations of classes; and
- Unforeseen medical situations affecting the participant or an immediate family member.

For the purposes of this policy, immediate family members include the participant's parents (including step-parents), spouse or domestic partner, and children (including step-children, or children the participant has been awarded custody of through a court).

ITA extension requests must be submitted and approved by the President/CEO of the WDBCO or his/her designee, or the FCDJFS Deputy Director for Workforce Development or his/her designee.

The duration of an ITA is determined by a participant's career pathway and the training and services necessary to meet the participant's goal based on their assessment and IOP. Generally, training is either short-term or long-term.

Short-term training is training which is completed in 12 months or less. Short-term training is the preferred method since the goal is to attain employment quickly. Short-term prevocational services include development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct to prepare individuals for unsubsidized employment or training.

Long-term training is training whose length does not exceed 24 months (12 months for OWF recipients). Four-year degree programs may be funded when the participant can document that he or she is in the last two years of the program (e.g., remaining hours are equal to or less than 50 percent of the total credit hours required for the degree) and is in an in demand occupation.

Extensions

If a participant is unable to complete the training program within the time frame outlined in the ITA, and the ITA may be extended. These include, but are not limited to:

- Military service or leave time;
- Lack of availability of classes;
- Cancellations of classes; and
- Unforeseen medical situations affecting the participant or an immediate family member.

For the purposes of this policy, immediate family members include the participant's parents (including stepparents), spouse, domestic partner, and children (including stepchildren, or children who the participant has been awarded custody of through a court).

ITA Extension requests must be submitted and approved by the President/CEO of the WDBCO, or his/her designee or the FCDJFS Deputy Director for Workforce Development or his/her designee.

Maximum Funding for Training:

The maximum funding for training is \$14,000 for the lifetime of a participant. The participant and case manager must research other sources of funding to support ITA expenses to leverage and support the availability of CCMEP funding.

FCDJFS shall determine the maximum amount for an ITA, using WIET and other resources to inform determinations.

FCDJFS will consider the following in determining the maximum amount:

- Average cost of training for specific in-demand occupations within the local area;
- Local average cost of the service;
- That the training investment is in line with the projected future wages;
- The full cost of participating in training services, including the cost of dependent care and transportation, and other appropriate costs; and
- Associated costs including training, fees and books, and tuition.

An individual may select training that costs more than the \$14,000 maximum amount when other sources of funds are available to supplement the ITA. The President/CEO of the WDBCO or his/her designee, or the FCDJFS Deputy Director for Workforce Development or his/her designee, should be informed and approve ITA spending in excess of \$14,000.

Recovery of Tuition Funds from Training Providers:

In the event a participant discontinues training, the case managers must do due diligence to ensure the recovery of CCMEP funds provided to training institutions. Case managers must verify the following:

- The refund policy of the provider for early termination from the training program;
- Requirements for the provider to notify the case manager of early customer dropout;
- The percentage of the advanced payment to be returned;
- Turnaround timeframe for the refund; and
- Time allowed to be spent in training before a refund will no longer be honored.

Informed Consumer Choice:

Training services must be provided in a manner which maximizes informed consumer choice in selecting an eligible provider. When participants and local areas select an eligible training provider they should consider providers who are eligible for financial aid to ensure best use of CCMEP funds.

Reporting Requirements:

Pursuant to OAC 5101:14-1-02, the lead agency working in consultation with the WDBCO shall ensure the timely and accurate reporting of CCMEP participants, activities, and performance information by using the Ohio Workforce Case Management System (OWCMS) and CFIS Tracker.

Resources and References:

- OAC 5101:14-1-01;
- 20 CFR 680.300, 680.320, 680.330;
- WIOA Policy #5601 - Individual Training Accounts;
- WIOA Title I Policy 5611, Revision 1 - Governor's Procedures for Determining Training Provider Eligibility;
- WIOAPL 1511;
- WIOAPL 1510;
- Workforce Innovation and Opportunity Act, Pub. L. 113128;
- 20 CFR. Parts 603 et al.;
- 29 USC. 3101 et seq.;
- Ohio Administrative Code rule 5101:9 3004, Mandated Use of Ohio Workforce Case Management System (OWCMS); and
- ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 1509, Training Services for Adults and Dislocated Workers, (July 1, 2015).

I. Processing timeframe

Individuals will be referred to the CCMEP program within seven days of (1) being authorized for OWF benefits, if work-eligible; (2) requesting to participate in CCMEP, if individual is receiving OWF benefits and not work-eligible; (3) requesting to participate in CCMEP, if individual is receiving PRC benefits; or (4) being determined to have a barrier to employment, if individual is a low-income adult, in-school youth, or out-of-school youth found to be eligible for the WIOA youth program in accordance with OAC 5101:10-3-01.

Comprehensive assessments are the process by which individual job readiness skills and barriers to self-sufficiency are identified, along with CCMEP services necessary to overcome said barriers. Individuals will be scheduled for and receive a comprehensive assessment no later than ten days from the date the individual was referred to CCMEP. This assessment will result in both an individual service strategy detailing the services a program participant may expect to receive and an individual opportunity plan that describes the participant's short and long-term employment goals, including the services and activities necessary to realize them. These services may include intensive case management, to include biweekly caseworker counseling.

II. County Conferences, State Hearings

Individuals have the right to request a county conference and/or state hearing should they disagree with an action taken on their case. A county conference is a meeting between you and a representative of the county agency where issues may be resolved more quickly, without necessitating the scheduling of a state hearing. Individuals may contact the county agency to schedule a conference. At a state hearing, an administrative officer will receive testimony and determine whether correct case actions were taken. Individuals may request a state hearing by submitting the state hearing request form that is attached to each eligibility notice. Additional information state hearings may be found in the State Hearing chapter of the Program Enrollment Guide.

III. Civil Rights, Discrimination

There are various laws, regulations, and rules prohibiting unlawful discrimination in the operation of CCMEP and other public programs. Individuals who feel they may have been discriminated against are encouraged to file a complaint, as per the Civil Rights chapter of the Program Enrollment Guide.

IV. Confidentiality

Individuals have the right to have their case information kept in a confidential, secure manner. Case information will not be discussed with anyone who is not authorized to receive the information. Individuals who wish to authorize another individual to receive and discuss case information may do so by submitting a written statement to their case manager. Social security numbers will be used to check provided information against information held by other federal, state, and local agencies.

V. Participant responsibilities

Participants are responsible for committing themselves to CCMEP activities for a minimum of twenty hours per week. Based on the individual's service strategy, time spent in activities, case management, homework, travel time, etc. may be included as part of the participant's required hours. Participants are expected to be actively engaged in developing their individual service strategy, utilizing CCMEP services and maintaining communication with their case worker.

VI. FCDJFS/WDBCO responsibilities

Participants will receive CCMEP services for the amount of time necessary to ensure successful preparation to enter post-secondary education and/or unsubsidized employment. There is no time limit on participation in CCMEP or required sequence of services. Prior to ending an assigned CCMEP activity due to durational limitations based on a funding source or local, state, or federal policy, the case worker shall ascertain whether the participant may continue in the assigned activity through an alternative CCMEP service or if the existing CCMEP service may be continued in spite of the limitation and without interruption by using an alternative funding source.

CCMEP eligibility may end after the participant is determined to have successfully entered post-secondary education, military enlistment or deployment, and/or unsubsidized employment. Other circumstances that may terminate eligibility include an award of social security disability insurance or supplemental security income. Failing to utilize CCMEP services on multiple occasions without good cause may result in the revocation of eligibility following reasonable efforts to contact the participant.

When a determination has been made to exit someone from the CCMEP program, the case worker shall ensure that the program participant either does not require or has repeatedly failed to utilize additional services. The participant shall be issued a notice of adverse action no less than 30 days from ending all services, setting forth a 90-day timeline for ending eligibility. Participants will continue to be engaged by case workers during this ninety-day period to ascertain the appropriateness of the individual service strategy and determine whether additional services are needed. Program participants shall remain CCMEP-eligible where additional services are determined to be necessary. Follow-up services may continue to be provided to former CCMEP participants following exit.

Resources and References:

- OAC 5101:14-1-03 CCMEP: Program Plan
- OAC 5101:14-1-04 CCMEP: Assessment and Individual Service Strategy
- OAC 5101:14-1-05 CCMEP: Individual Opportunity Plan and Activities
- OAC 5101:14-1-06 CCMEP: Program Exit and Follow-up Services

Youth Service Provider Monitoring

The objectives of CCMEP youth service provider monitoring are above all, to ensure that all funds awarded and subsequently expended are properly accounted for, through proper procurement and the reimbursement of allowable costs. The fiscal monitoring team applies the federal cost principles, federal program requirements, state administrative code and the terms and conditions of each sub award/contract to ensure sub awards are properly administered.

The Audit Schedule

The list of sub-awards along with the respective hard copies are obtained from Development Support Services (DSS) and cross-referenced with the Finance Department. An audit schedule is created and maintained by the audit team.

Youth Service Provider Risk Evaluation

The Department Auditor develops a monitoring schedule based upon the risk assessment of each Provider. The process for compiling the schedule is as follows:

Award Amount:

Sub-awards are stratified by award amount; Type A over \$700,000, Type B less than \$700,000.

Risk Assessment/Internal Control Questionnaire:

Youth service providers complete a risk assessment and internal control questionnaire as part of the RFP process. If awarded federal funds, the risk assessment and internal control questionnaire immediately becomes part of the work papers.

Providers Independent Audit:

Review provider's most current independent audit. Complete an assessment of any findings stated with the report.

Other factors considered in the risk evaluation are based on sub award history of the provider:

- Does the youth service provider have a current sub-grant/contract with DSS;
- Has the youth service provider ever been disbarred;
- Has the youth service provider ever received an FCDJFS monitoring visit;
- What are the results of the prior FCDJFS audit, if applicable; and

- What are the current organizational issues, as stated from DSS, with the provider.

Thus, a provider will be classified **high/medium/low risk** in the audit schedule.

The Fiscal Monitoring Process

Youth service providers are initially contacted by telephone to provide notification of the pending monitoring and to secure a date. A letter clearly stating the scope, authority, and purpose of the monitoring along with a list of required documentation to be reviewed is delivered.

The audit scope for youth service providers will cover the following areas –

- Reporting and Communication
- General Planning
- Financial Testing
- Payroll Testing
- Compliance Testing
- Equipment Testing
- Secondary Youth Service Provider Review, if applicable

Fieldwork results are communicated via draft report to the youth service provider to solicit management comments and to provide further documentation if needed on preliminary findings. A final report is issued along with a Schedule of Findings, if applicable. The Final Report and Schedule of Findings are issued to the entity, and the applicable contracting units within FCDJFS to comply with the management decision on the report.

Youth Service Provider Monitoring Procedures

1. Monthly desk reviews by DSS staff.
2. Review audit schedule.
3. Select prioritized provider for monitoring.
4. Request and review monitoring reports completed by DSS covering the monitoring period.
5. Contact provider by phone to set up Entrance Conference.
6. Send out notification letter including list of requested documents.
7. Conduct Entrance Conference.
8. Conduct fieldwork testing. Review, collect and analyze documents.
9. Perform Post Audit Conference.
10. Complete section summaries, index and scan supporting documentation to include comments to source documents.
11. Generate referenced draft report.
12. Reference draft report reviewed for accuracy and completeness.
13. Generate draft report for internal management and provider. Provider is given 10 days to respond.
14. Issue final report and, if applicable, Schedule of Findings to provider; copy DSS.
15. If a corrective action (CAP) plan is needed, state in final report the CAP is to be received within 60 days of the date of the final report.
16. Follow up on CAP within 30 days to check on progress.
17. Communicate need for DSS management decision on CAP within 6 months of receipt of the CAP.

Development Support Services Monitoring Process

1. Development Support Services staff conducts scheduled and unscheduled provider-monitoring visits on a quarterly or biannual basis as specified by contract.
2. Findings are memorialized in Operational and Service Delivery Reports. See attached.
3. Corrective Action Plans are developed in response to providers who fail to meet their contract obligations. Additional site-monitoring visits are scheduled as needed to confirm improvements.

Forms

Use FCDJFS DSS Operational Monitoring Report and FCDJFS DSS Service Delivery Monitoring Report

Appendix F

Data Collection and Reporting

Data pertaining to CCMEP's primary performance measures, as outlined in OAC 5101:14-1-07(A), is collected as follows:

- Participation in unsubsidized employment, education, or occupation skills training is ascertained during the program exit interview and quarterly follow-up contacts for a period of twelve months. See OAC 5101:14-1-07(A)(1)-(3);
- Participants who obtain a recognized post-secondary credential or secondary school diploma or its recognized equivalent during participation in or within one year of exiting CCMEP are identified during the program exit interview and quarterly follow-up contacts for a period of twelve months. See OAC 5101:14-1-07(A)(4);
- The median earnings of program participants who are in unsubsidized employment are reported during the exit interview and quarterly follow-up contacts for a period of six months. See OAC 5101:14-1-07(A)(5);
- Participating employers are surveyed for program effectiveness on an annual basis, as part of the CCMEP plan renewal process. See OAC 5101:14-1-07(A)(6); and
- Participants in an education or training program that leads to a recognized post-secondary credential, a secondary school diploma or its recognized equivalent, or employment and who are achieving measurable skill gains towards such a credential or employment are surveyed during the program exit interview and quarterly follow-up contacts for a period of twelve months. See OAC 5101:14-1-07(A)(7).

Data is collected from all CCMEP participants excepting those meeting one or more of the conditions of OAC 5101:14-1-07(D), namely:

- Incarceration or institutionalization. The program participant is residing in an institution or facility providing twenty-four hour support for at least a ninety calendar day period that includes the date of exit;
- Death. The program participant was not living on the date of exit;
- The program participant was exited from CCMEP in accordance with OAC 5101:14-1-06(A)(2), having been awarded social security disability insurance or supplement security income by the social security administration and has made application for services with opportunities with disabilities; or
- The program participant is in the foster care system as defined in 45 CFR 1355.20(a) and exits the program because the program participant has moved from the local workforce area as part of such a program or system.

Data is recorded in OWCMS, CFIS, and paper files (as required) then reported to ODJFS on an annual basis or as required by law.

Area 11: Local Policy
WIOA Youth Eligibility & Youth Requiring Additional Assistance

Purpose:

This policy provides guidance on the criteria for WIOA Youth Eligibility and youth qualifying for program services through the “Requires Additional Assistance” eligibility category. Specific guidelines and requirements reside with local workforce boards to determine the qualifications as a need for additional assistance.

Background:

Youth who participate in WIOA Title I youth funded activities must meet the eligibility criteria for an in-school youth or an out-of-school youth and meet one or more of the barriers as described in WIOA section 129 (a)(1)(B) and (C).

In-School - Eligibility for in-school youth, who at the time of enrollment is:

- Attending school;
- Not younger than 16 or (unless an individual with a disability who is attending school under state law) older than age 21;
- Is a low-income individual; and
- Has one or more of the following barriers:
 - Basic skills deficient;
 - An English language learner;
 - Is Justice involved (offender);
 - A homeless individual (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6))), a homeless child or youth (as defined in section 725 (2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2))), a runaway, in foster care or has aged out of the foster care system, a child eligible for assistance under the John H.Chafee Foster Care Independence Program, or in an out-of-home placement;
 - Pregnant or parenting;
 - An individual with a disability; or
 - An individual who requires additional assistance to complete an education program or to secure or hold employment as defined by the local area.

Out-of-School - Eligibility for out-of-school youth, who at the time of enrollment, is:

- U.S. Citizen or otherwise legally entitled to work in the U.S.; and
- Not attending any school;
- Also, not younger than 16 or older than age 24; and
- Selective Service Registration (if applicable), unless an exception is justified; and
- Has one or more of the following barriers:
 - A school dropout;
 - A youth who is within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter;
 - A recipient of a secondary school diploma or its recognized equivalent who is a low income individual **and** is basic skills deficient **or** an English language learner;
 - An individual who is subject to the juvenile or adult justice system;
 - A homeless individual (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6))), a homeless child or youth (as defined in section 725 (2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2))), a runaway, in foster care or has aged out of the foster

care system, a child eligible for assistance under the John H. Chafee Foster Care Independence Program, or in an out-of-home placement;

- An individual who is pregnant or parenting;
- A youth who is an individual with a disability; or
- A low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment as defined by the local area.

According to WIOA section 129 (a) (1) (C) (VII) one of the barriers for an in-school youth is “an individual who requires additional assistance to complete an education program or to secure or hold employment.” Out-of-school youth have a similar barrier; “an individual who requires additional assistance to enter or complete an educational program or to secure or hold employment (WIOA section 129 (a) (1) (B) (VIII)).” Both in-school and out-of-school youth who require additional assistance must be low-income.

Local workforce boards have the ability to assess additional barriers for youth in their local area based on demographics and unique local conditions. Defining “youth requiring additional assistance” at the local level provides flexibility for boards to determine what constitutes a barrier in addition to the already defined WIOA youth eligibility barriers as described in WIOA section 129 (a)(1)(B) and (C).

A locally defined barrier in the “youth requiring additional assistance” policy must not be duplicative of the WIOA in-school and out-of-school eligibility barriers. Locally identified barriers must describe a population of youth who may benefit from WIOA Title I youth activities but would otherwise be excluded based on eligibility. Locally identified barriers must be clearly defined with specified documentation requirements and implemented with formal board approval. As listed in WIOA §129(a)(3)(B) not more than 5% of the in-school youth in each local area may be categorized as individuals who require additional assistance to complete an educational program or to secure or hold employment. At the time of eligibility determination, youth must present verifiable documentation indicating that they meet the eligibility requirements for either an in-school youth or an out-of-school youth and that they require additional assistance.

Policy:

The Workforce Innovation and Opportunity Act allows local areas to provide services to WIOA In-School and Out-of-School youth who are low income, but do not meet one of the listed barriers, for up to 5% of their enrollment. These participants are considered “youth who require additional assistance” in order to succeed in their educational and employment goals.

An eligible WIOA In-School and Out-of-School youth who requires additional assistance to complete an educational program, or to secure and hold employment, means an individual who is:

1. Low income
2. Enrolled in an apprenticeship, trade, post-secondary education program, but also requires additional assistance beyond that offered by the service provider in order to complete the activity or program; or

3. An eligible WIOA In-School or Out-of-School youth who is near the point of being ready for a job or employment, but requires additional assistance under Title I to acquire or retain a job.

Documentation to be provided includes:

- Complete Educational Program (Must attach letter from educational provider stating the additional requirements needed from WIOA to avoid failure in the program). Educational program must be designed to lead to an in-demand occupation and must result in youth earning wages above the local living wage.
- Secure and Retain Employment (Must attach letter from a prospective employer stating the additional requirements are needed to avoid failure in obtaining a specific job, or a letter from a present employer, stating the additional requirements are needed, to prevent an employed youth from losing their employment.) Employment must be in an in-demand occupation and must result in youth earning wages above the local living wage.

All WIOA In-School and Out-of-School youth with the “Requires Additional Assistance Barrier”, must be approved by the WDBCO prior to enrollment. A written request, that includes the required documentation to support that additional assistance is required to complete education program or secure and retain employment must be submitted and approved by the WDBCO before enrollment.

As the 5% Requires Additional Assistance Youth Barrier is a criterion for participant eligibility, Service Providers that enroll a Requires Additional Assistance Barrier youth without prior WDBCO approval and/or exceeds the 5% Needs Additional Assistance allowance by doing such, may be subject to disallowed costs. The WDBCO will review possible disallowed costs on a case by case basis.

Definitions:

Age of compulsory school age: a child who is between 6 and 18 years of age.

Alternative school: schools which offer specialized, structured curriculum inside or outside of the public school system which may provide work/study and/or academic intervention for students with behavior problems, physical/mental disabilities, who are at-risk of dropping out, who are institutionalized or adjudicated youth and/or youth who are in the legal custody of the Ohio Department of Youth Services and are residing in an institution. An alternative school must be approved by the local education agency.

Attending school: an individual who is enrolled and/or attending secondary or postsecondary school.

Basic skills deficient: a youth who has English reading, writing, or computing skills at or below the 8th grade on a generally accepted standardized test or who is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society.

Charter school: public, nonprofit, nonsectarian, tuition-free schools operating independently of a school district, but under contract with a Sponsor that has been approved by the Ohio Department of Education.

Chronic truant: any child of compulsory school age who is absent without legitimate excuse for absence from the public school the child is supposed to attend for 7 or more consecutive school days, 10 or more school days in one month, or 15 or more school days in a school year.

Covered individual: an eligible in-school youth, or an eligible out-of-school youth who is low income and meets one of the following criteria:

- a. Has a secondary school diploma or its recognized equivalent and is basic skills deficient or an English language learner; or
- b. Requires additional assistance to enter or complete an educational program or to secure or hold employment.

Disability: Any person who has a physical, sensory, or mental impairment, which substantially limits one or more major life activities per the American Disabilities Act of 1990 (42 U.S.C. 12102) and has a record of such impairment or is regarded as having such impairment.

Enrollment: the collection of information to support eligibility determination and participation in any one of the 14 program elements.

Family: two or more persons related by blood, marriage, or decree of court, who are living in a single residence and are included in one or more of the following categories:

- a. Two spouses and dependent children.
- b. A parent or guardian and dependent children.
- c. Two spouses.

Habitual truant: any child of compulsory school age who is absent without legitimate excuse for absence from the public school the child is supposed to attend for 5 or more consecutive days, 7 or more school days in one school month, or 12 or more school days in a school year.

Homeless children and youth (section 725 (2) of the McKinney-Vento Homeless Assistance Act): An individual who lacks a fixed, regular, and adequate nighttime residence and includes the following:

- a. Children and youths who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations; are living in emergency or transitional shelters; are abandoned in hospitals; or are awaiting foster care placement;
- b. Children and youths who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings;
- c. Children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and
- d. Migratory children who qualify as homeless for the purpose because the children are living in one of the previously mentioned circumstances.

Homeless individual (as defined in section 41403 (6) of the Violence against Women Act of 1994 (42 U.S.C. 14043e-2 (6)):

An individual who lacks a fixed, regular, and adequate nighttime residence and includes:

- a. An individual who:
 - Is sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason:
 - Is living in a motel, hotel, trailer park, or campground due to the lack of alternative adequate accommodations;

- Is living in an emergency or transitional shelter;
- Is abandoned in a hospital; or
- Is awaiting foster care placement.

b. An individual who has a primary nighttime residence that is a public or private place not designed for or ordinarily used as, a regular sleeping accommodation for human beings; or

c. Migratory children who qualify as homeless because the children are living in circumstances listed above.

Individual with a disability: an individual with a disability as defined in section 3 of the Americans with Disabilities Act of 1990 (42 U.S.C. 12102).

Lower living standard income level: As defined in section 3 (36) (b) of WIOA, income level (adjusted for regional, metropolitan, urban, and rural differences and family size) determined annually by the Department of Labor based on the most recent lower living family budget issued by the Secretary.

Low-income individual: As defined in section 3 (36) (a) of WIOA, an individual who-

a. Receives, or in the past 6 months has received, or is a member of a family that is receiving or in the past 6 months has received, assistance through the supplemental nutrition assistance program (SNAP), temporary assistance for needy families (TANF), or the supplemental security income (SSI) or local income-based public assistance;

b. Is in a family with total family income that does not exceed the higher of-

- The poverty line; or
- 70% of the lower living standard income level.

c. Is a homeless individual;

d. Receives or is eligible to receive a free or reduced price lunch;

e. Is a foster child on behalf of whom the State or local government payments are made; or?

f. Is an individual with a disability whose own income meets the eligibility income requirement of clause (b) but who is a member of a family whose income does not meet this requirement.

Participation: the point at which the individual has been determined eligible for youth program services, has received an assessment, and has received or is receiving at least one program element and is the point at which the individual is to be included in calculations for performance measures.

Post-secondary school: any schooling that follows graduation from high school or completion of high school equivalency, including community colleges, four-year colleges and universities, and technical and trade schools.

Runaway: a young person who has run away from home.

Secondary school: a nonprofit institutional day or residential school, including a public secondary charter school, that provides secondary education as determined under State law, except that the term does not include any education beyond grade 12.

School: any school operated by a board of education, any community school established under Chapter 3314. of the Revised Code, or any nonpublic school for which the state board of education prescribes minimum standards under section 3301.07 of the Revised Code.

School dropout: an individual who is no longer attending any school and has not received a secondary school diploma or its recognized equivalent.

References:

Workforce Innovation and Opportunity Act, Pub. L. 113-128
20 CFR 603 et seq.
29 U.S.C. 3101 et seq.
Ohio Rev. Code 2925.01
Ohio Rev. Code 3321.01
ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-07, Source Documentation for WIOA Eligibility, (July 1, 2015).
ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-04, Selective Service Registration, (July 1, 2015).

Inquiries:

Stephanie Robinson, Program Administrator
Workforce Development Board of Central Ohio
1650 Lake Shore Drive, Suite 110
Columbus, Ohio 43204
614-559-5064

Approved:

WDBCO Board		WDBCO	
Signature:		Signature:	
Title:	Jim Negron WDBCO Board Chair	Name:	Lisa Patt-McDaniel
Date:		Title:	President & CEO
		Date:	



COMPREHENSIVE CASE MANAGEMENT AND EMPLOYMENT PROGRAM (CCMEP)

Release of Information

I, the undersigned, acknowledge that I am voluntarily seeking to become a participant in CCMEP, funded under the Temporary Assistance for Needy Families (TANF) and the Workforce Innovation Opportunity Act (WIOA) and administered by Franklin County Department of Job and Family Services (FCDJFS) and the Workforce Development Board of Central Ohio (WDBCO). As a Participant, I agree to and authorize the following:

1. Sharing of Information

I authorize any person, organization, or agency (such as WDBCO, FCDJFS, ODJFS, secondary schools, post-secondary schools, employers, etc.) having information concerning my goals, objectives, work experience, education, interests, and program completion outcomes, to share any such information that may be pertinent to my participation in CCMEP with any other person or agency having a need for such information. In particular, I authorize the sharing of such information with FCDJFS and the WDBCO.

By signing below, I understand that this authorization shall expire upon my exit from the CCMEP program or until revoked by me in writing, whichever comes first. I have the right to revoke or cancel this authorization at any time by providing notice in writing to the following address:

Franklin County Department of Job and Family Services
1721 Northland Park Avenue
Columbus, Ohio 43229

The revoking or canceling of this authorization does not affect the use or disclosure of information that occurred prior to the date that authorization was canceled.

2. Job Placement and Follow-up

I agree to provide FCDJFS and the WDBCO with information regarding my education and employment status once I have completed CCMEP. Further, I authorize any party to release information that will allow FCDJFS or the WDBCO to comply with state guidelines and regulations that require up to 12 months of follow-up on all CCMEP participants. This includes the authorization of FCDJFS, WDBCO, ODJFS, my employers, and my training providers to release such information to each other.

3. Confidentiality

I understand that FCDJFS and the WDBCO will only solicit information necessary and relevant to my participation in CCMEP and will treat such information as confidential. Information will not be released to any unauthorized person, organization, or agency.

Any information used or disclosed as per this specific authorization may be re-disclosed by the person or entity receiving the information. In such a situation, it may no longer be protected by federal or state law. This authorization is not for the release or use of protected health information (PHI).

4. Right to Appeal

Individuals have the right to request a county conference and/or state hearing should they disagree with an action taken on their case. A county conference is a meeting between you and a representative of the county agency where issues may be resolved more quickly, without necessitating the scheduling of a state hearing. Individuals may contact the county agency to schedule a conference. At a state hearing, an administrative officer will receive testimony and determine whether correct case actions were taken. Individuals may request a state hearing by submitting the state hearing request form that is attached to each eligibility notice. Additional information state hearings may be found in the State Hearing chapter of the Program Enrollment Guide.

5. Notification of Permission to Photograph

In the event that I am selected as a participant, I grant FCDJFS and/or the WDBCO the right to photograph me while I am enrolled in CCMEP. I understand that photographs will be used for promotional advertisements or other displays promoting CCMEP.

Would you like to opt-out of the "Notification of Permission to Photograph?" Yes No ____ Initials

6. Notification of Contact by Text Message

I consent to FCDJFS and/or the WDBCO contacting me by text message for purposes of requesting CCMEP program feedback, and appointment reminders. I agree to advise FCDJFS if my mobile number changes or if this is no longer in my possession. I understand that I can cancel the text messaging services at any time by contacting FCDJFS.

Would you like to opt-out of the "Notification of Contact By Text Messaging?" Yes No ____ Initials

Participant (or authorized representative): _____ **Date:** _____

Service Provider Signature: _____ **Date:** _____

CCMEP Supportive Services Table

Description	Definition	Guidelines	FCDJFS Funding Allowance	WDBCO Funding Allowance
Books, School Supplies and Materials	Assistance with the costs of books, school supplies and materials needed so that he or she may participate in postsecondary education classes.	<ul style="list-style-type: none"> Requester should ensure books, supplies and materials are required and pricing is considered reasonable. 		Allowable per guidelines
Child Care/Dependent Care	<p>Assistance with either the referral to subsidized child care or for temporary assistance in child care payments necessary to allow the participant to participate in CCMEP services and activities.</p> <p>Assistance with finding dependent care for a family member as well as provision of payment for such care so that the participant may participate in CCMEP services and activities.</p> <p>Publically funded childcare must be explored prior to submitting this request.</p> <p><i>Special approval by the Director of FCDJFS/WDBCO or his/her designee for exceptions</i></p>	<ul style="list-style-type: none"> Accessible: the child care must allow the participant to participate in CCMEP services or activities within 90 minutes of departing from their home Appropriate: the child care must be a provider licensed by ODFJS or certified by FCDJFS; and Affordable: the cost of child care must be acceptable to the participant or FCDJFS/WDBCO must provide a subsidized arrangement with co-payments of subsidized child care. Written documentation that demonstrates an application for publically funded childcare has been explored/submitted is required. 	Limited to no more than 4 months	Allowable per guidelines
Community Assistance Referral	Assistance in determining appropriate community based organization to meet an immediate need of the CCMEP participant so that he or she may participate in program services and activities.	<ul style="list-style-type: none"> As approved by FCDJFS/WDBCO 	Allowable per guidelines	Allowable per guidelines
Criminal Justice (Domestic Violence) Referral	Assistance in referring victims of domestic violence to appropriate legal services.	<ul style="list-style-type: none"> Assistance with referral services only. 	Refer to community resources	Referral is allowable per guidelines
Disability Accommodations/ADA Modifications	The assistance and provision of services which provide reasonable accommodations to enable an individual with disabilities to participate in certain assessments and to have equal access and opportunity to participate in a variety of work-based learning activities.	<ul style="list-style-type: none"> Requester should ensure pricing is considered reasonable. Must obtain at least three (3) quotes for the goods or services to be acquired, unless requirements restrict to a sole provider. Documentation should be maintained to show each quote, or verification of sole provider. If a potential supplier cannot provide a quote, another quote should be obtained in its place. If three (3) quotes cannot be obtained, documentation should exist to show how attempts were made to obtain quotes. 	Payments must have prior approval by FCDJFS Finance	Allowable per guidelines

CCMEP Supportive Services Table

<p>Educational Testing/Fee Expenses (excluding ITA's)</p>	<p>Assistance with educational testing and associated fee expenses which will allow participants with the opportunity to take high school equivalency tests, as well as other exams for occupational certification and credentials.</p>	<ul style="list-style-type: none"> • Requester should ensure pricing is considered reasonable. • Must obtain at least three (3) quotes for the goods or services to be acquired, unless requirements restrict to a sole provider. • Documentation should be maintained to show each quote, or verification of sole provider. • If a potential supplier cannot provide a quote, another quote should be obtained in its place. • If three (3) quotes cannot be obtained, documentation should exist to show how attempts were made to obtain quotes. 		<p>Allowable per guidelines</p>
<p>Health Care Access/Referral</p>	<p>Assistance in finding appropriate medical insurance coverage and medical care provider.</p>	<ul style="list-style-type: none"> • Assistance with referral services only. Payments for medical insurance are considered unallowable. 	<p>Payment for medical services are not allowable with TANF funds</p>	<p>Referral is allowable per guidelines</p>
<p>Housing</p>	<p>Temporary assistance in payment for rent and/or rental deposits. \$1,500 Maximum per request.</p> <p><i>Special approval by the Director of FCDJFS/WDBCO or his/her designee for exceptions</i></p>	<p>Rent/Mortgages</p> <ul style="list-style-type: none"> • Payment will not be made for closing costs, down payment on a home, second mortgages, or home equity lines of credit. • Payment will not be made for any late fees, legal expenses, penalties, or court costs. • Eviction filing fees will not be paid without proof from the landlord that eviction paperwork has been filed. • Payment will not be made if the AG lives with or is employed by the landlord. • Applicant must provide documentation regarding the amount due and the month(s) for which payment is being requested. • Rent and mortgage expenses are considered delinquent if at least five days overdue or if they provide verification of a notice of eviction • A current lease agreement is required for all rent-related requests. • Payment will not be made to the landlord for utilities if not disclosed in the lease agreement. • A copy of any subsidized assistance agreement is required, if applicable <p>* Homeless applicants who are “doubled-up” and temporarily living at an address where they are not listed on the lease or mortgage may receive supportive service assistance to move out and establish their own household. In these situations, the AG is the applicant’s immediate family and not the entire household where they currently reside. The doubled-up living situation may be verified by written self-declaration or a letter</p>	<p>Limited to no more than four months of assistance</p>	<p>Limited to no more than four months of assistance</p>

CCMEP Supportive Services Table

<p>Housing (cont'd)</p>		<p>from the host or third party. Doubled-up applicants must also demonstrate proof of intent to establish their own household. Benefits for these applicants is limited to rent, and rental and utility deposits.</p> <p>Security Deposits</p> <ul style="list-style-type: none"> • Payment will not be made for pet deposits. • The applicant and landlord must both complete and sign the Shelter Deposit Repayment Agreement (FCDJFS 3805). • A security deposit paid by FCDJFS/WDBCO must be returned to FCDJFS/WDBCO by the landlord upon termination of the lease, minus any verifiable damages • A current lease agreement is required for all rent-related requests. <p>Furnishings</p> <ul style="list-style-type: none"> • As approved by FCDJFS/WFBCO • Priority should be given to “second hand” providers, given the furnishings are reasonable in pricing and reasonable in quality. 		
<p>Legal Services</p>	<p>Assistance with legal services, including but not limited to access to driver’s licenses.</p>	<ul style="list-style-type: none"> • As approved by FCDJFS/WDBCO • Attempts to negotiate reduced or waived costs should be conducted. 	<p>Expunging criminal records or resolving issues with debt, credit and housing are not allowable with TANF Funds</p>	<p>Expunging criminal records or resolving issues with debt, credit and housing are not allowable with WIOA Funds</p>
<p>Transportation</p>	<p>Assistance with the cost of transportation necessary to enable a participant to participate in CCMEP activities. Transportation costs may include bus tickets, costs of a taxi, car repairs, etc.</p> <p><i>Special approval by the Director of FCDJFS/WDBCO or his/her designee for exceptions</i></p> <p>Assistance with the cost of transportation necessary to enable a participant to participate in CCMEP activities. Transportation costs may include bus tickets, costs of a taxi, car repairs, etc.</p> <p><i>Special approval by the Director of FCDJFS/WDBCO or his/her designee for exceptions</i></p>	<p>Transportation Services -</p> <ul style="list-style-type: none"> • Intermittent daily or weekly bus passes that support participation in CCMEP activities • Monthly bus passes • License Plate Renewals • With proof of employment or job offer, or actively engaged in a program to secure employment, reinstatement fees for Ohio driver’s license at the discretion of FCDJFS/WDBCO and contingent upon the completion of all reinstatement requirements for driver's licenses suspended under the following circumstances: (1) accumulation of 12 points; (2) missed child support payments; 	<p>Limited to no more than four months. Reimbursement of gas cards are allowed with prior written authorization from FCDJFS. Other transportation services/options to be approved by FCDJFS.</p>	<p>Allowable per guidelines</p>

CCMEP Supportive Services Table

<p>Transportation Cont'd</p>		<p>(3) first offense OVI (DUI); (4) high school suspension; (5) juvenile suspension; (6) license/bond forfeiture; (7) liquor law violations; (8) National Driver Registry (NDR); (9) non-compliance (crash report, accident, traffic ticket); (10) non-resident violator compact; (11) Operating a Vehicle After Under Age Consumption (OVUAC); (12) random selection; (13) tobacco violation; or (14) violation of restriction suspension.</p> <p>Auto Repairs and Maintenance –</p> <ul style="list-style-type: none"> • Lowest of two (2) estimates, maximum of \$1,500 • Proof of employment or job offer, or actively engaged in a program to secure employment. • Payment will not be made for auto repairs completed outside Franklin County unless prior approval. • Repair costs are limited to the retail value of the car established by Kelley Blue Book (www.kbb.com) or www.NADAguides.com. • Vehicle must be the AG's sole means of transportation. • Two estimates are required. Each estimate must be acquired from a business registered with the Ohio Secretary of State's office. https://www5.sos.state.oh.us/ords/f?p=100:1:0 • Applicant must present valid driver's license and proof of liability insurance. • Applicant must show proof of ownership or lease agreement with dealer. • Applicant must provide verification that the repair is not covered under warranty. • Applicant must present a copy of auto title or lease agreement. The title/lease of the applicant's auto must have been in his/her name for a minimum of 90 days. <ul style="list-style-type: none"> • Repairs made to the auto are limited to those needed to make the vehicle operable (e.g., body damage, tire damage, etc.). 		
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CCMEP Supportive Services Table

		<ul style="list-style-type: none"> • Cosmetic repairs only, such as painting and striping, will not be paid. • The auto should be drivable after repairs are completed. • Payment will not be made for ongoing maintenance requirements of vehicle (e.g., oil, air, windshield wipers, filters, tune-up, tire rotation, etc.). • Repairs are not subject to sales tax. No payment of sales tax will be made by the applicant or FCDJFS when FCDJFS is making the payment. • Customary warranty from the vendor must be a minimum of 30 days. 		
Uniforms/Work Attire	Assistance in the cost for uniforms and/or work attire so that the CCMEP participant may participate in paid or unpaid work experience, occupational skills training, and unsubsidized employment.	<ul style="list-style-type: none"> • Requester should ensure pricing is considered reasonable. • Must obtain at least three (3) quotes for the goods or services to be acquired, unless requirements restrict to a sole provider. • Documentation should be maintained to show each quote, or verification of sole provider. • If a potential supplier cannot provide a quote, another quote should be obtained in its place. • If three (3) quotes cannot be obtained, documentation should exist to show how attempts were made to obtain quotes. 	Should explore community resources prior to direct use of TANF funds	Allowable per guidelines
Work-Related Tools	Assistance in the cost for tools so that the CCMEP participant may participate in paid or unpaid work experience, occupational skills training, and subsidized employment.	<ul style="list-style-type: none"> • Requester should ensure pricing is considered reasonable. • Must obtain at least three (3) quotes for the goods or services to be acquired, unless requirements restrict to a sole provider. • Documentation should be maintained to show each quote, or verification of sole provider. • If a potential supplier cannot provide a quote, another quote should be obtained in its place. • If three (3) quotes cannot be obtained, documentation should exist to show how attempts were made to obtain quotes. 		Allowable per guidelines