

CCMEP COVID-19 Frequently Asked Questions

Recertification

Can we extend TANF eligibility for participants who are due for their semi-annual recertification during COVID-19 stay-at-home restrictions?

Yes. TANF eligibility may be extended as indicated below and in Procedure Letter #6.

- All TANF participants scheduled to have their TANF eligibility expire in March 2020, who have not already been recertified for April 1, 2020, will have their semi-annual TANF recertification periods extended through September 2020.
 - No further TANF recertification actions will be required by the household or lead agency until September 2020.
- If a participant has completed the semi-annual TANF recertification process in March 2020 and eligibility has been approved, the new recertification period will remain and will not be changed.
- All participants due for the semi-annual TANF recertification in April 2020 will have their certification periods extended through October 2020.
- All participants due for the semi-annual TANF recertification in May 2020 will have their certification periods extended through November 2020.

Verbal Signatures

Can we accept verbal signatures during COVID-19 stay-at-home restrictions?

Yes. Please see Procedure Letter #6 and ATL #271 regarding the Ohio Works First (OWF) program and CCMEP participants. Verbal signatures by phone are allowed for IOPs, CCMEP assessments, Eligibility applications (JFS 3002), and other required forms. Verbal signatures are also allowed for CCMEP participants as long as this is documented in case notes. This guidance also includes parent signatures for participants who are minors.

Verbal signatures should be documented in OWCMS in case notes using “On [Insert date] [Insert client name] provided a verbal signature to the [Insert form name(s)]. This verbal signature is in accordance with Action Change Transmittal Letter No. 271. A copy of the [Insert form name(s)] has been mailed to the client.”

Prior to accepting a verbal signature, case managers *must* read the contents of the IOP including rights, responsibilities and service/activity details. Following the acceptance of any verbal signature(s), a copy of the IOP, Eligibility application and/or CCMEP assessment *must* be mailed to the client.

For WIOA eligibility determination, the WIOA telephone eligibility verification form, [JFS 13188](#), and the WIOA self-attestation form, [JFS 13186](#) (which can be mailed) may be used to initially support eligibility documentation during COVID-19 stay-at-home restrictions.

Additional remote methods to verify and document eligibility, specifically for items such as age, birthdate, and citizenship, include systems such as Ohio Benefits. It's best to avoid having

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individuals take photos and email in unless the case manager is certain they are using encrypted technology (to protect their personally identifiable information) which most participants are unlikely to have access to.

The case manager or applicant must document on the JFS 13188 or JFS 13186 which specific elements of eligibility are being attested (e.g., age, birthdate, authorization to work, income, barrier to employment, etc.) and how the applicant meets the eligibility criteria. A note should also be entered in OWCMS case notes with specific dates of conversations, communication method and details on what still must be collected. Although these forms can be used for many WIOA documentation requirements, source documents, per [Attachment A](#) of [WIOAPL 15-07.2](#), must be collected as soon as possible after the stay-at-home period ends.

For TANF eligibility, the JFS 3002 allows individuals to self-attest income and family information. Any additional needed documents that cannot be verified via Ohio Benefits need to be collected as soon as possible after the stay-at-home period with a note entered in OWCMS case notes containing specific dates of conversations, communication method and details on what still must be collected.

Basic Skills Assessment

How should the basic skills assessment requirement be completed during the COVID-19 stay-at-home restrictions?

Instead of in-person testing, it is possible to use online practice assessments available on OhioMeansJobs.com or to send an assessment back and forth through the mail. Please collaborate with your local workforce area on which assessments are acceptable. One option available on OhioMeansJobs.com is the WorkKeys assessments. Please note that standardized assessments individuals have taken within the last six months can meet this requirement without the need for a new assessment.

The online WorkKeys practice assessment provides an estimated score. If the score is less than 3 (3 is a career-ready score) or is below grade level 9 for any mailed assessments, the individual could be tested more thoroughly after travel restrictions end to determine the educational functioning level (EFL). In-person, proctored EFL assessments like TABE 11/12 are necessary to show a skill gain for anyone who is basic skills deficient (for more details, see the [CCMEP performance desk aid](#)). For details on accessing the WorkKeys assessment, please see the [OMJ Resources Guide](#).

How can the basic skills assessment requirement be completed online?

Instead of in-person testing, it is possible to use online practice assessments available on OhioMeansJobs.com. Please collaborate with your local workforce area on which assessments are acceptable. One option available on OhioMeansJobs.com is the WorkKeys assessments. Please note that standardized assessments individuals have taken within the last six months can meet this requirement without the need for a new assessment.

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Engagement

How should case managers engage with participants during the COVID-19 stay-at-home restrictions?

Case managers are encouraged to take advantage of virtual options for engagement, including skype (other video conference options), texting, phone calls, and social media direct messaging. It's possible to also keep participants informed by sharing general information and instructions through agency-approved social media posts.

Please note case managers using text messaging or direct messaging through social media must use encrypted applications. The following options are encrypted: Facebook messenger, imessages (iphone), Remind, Signal, and Whatsapp (for texting). Case managers should use county or area equipment for communications and professional accounts for social media rather than personal social media accounts or cell phones. Virtual services and activities can also help keep participants engaged.

NEW! Can lead agencies shift to virtual services, such as e-learning, phone calls, and virtual meetings?

CCMEP provides flexibility to lead agencies in how they provide services. Lead agencies can choose the best method of continuing to deliver program services. Security of customer data and its transition as well as ease of customer access must be considered.

Provision of Services and Activities

How can CCMEP provide services and activities for participants during the COVID-19 stay-at-home restrictions?

Case managers should consider virtual options for services and activities. CCMEP participant OWF work eligibles negatively impacted by COVID-19 restrictions may qualify for good cause which should always be communicated to the cash assistance case managers on a timely basis to ensure these participants are not sanctioned inappropriately.

Also, please see the [online activity guide](#) for some suggestions on online resources and activities that could help participants move forward with life and career goals. Some suggested services and activities include online training available on OhioMeansJobs.com (see [OMJ Resources Guide](#)) to obtain a high school diploma by testing. Also, please consider short-term online

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credential training that may be available for participants since this is an important step toward entering an in-demand career. Eligible training providers for industry-recognized credentials can be researched on the [Workforce Inventory of Education and Training \(WIET\)](#). Another option to consider is online [entrepreneurial training](#) and preparation for participants interested in running their own businesses.

What resources are available to serve Ohio's Youth during COVID-19 restrictions?

The Office of Family Assistance has issued two letters (FAL #183 and 183-A) regarding the use of newly allocated PRC funds for a Summer TANF Employment program and COVID-19 assistance. The use of these funds requires an update to PRC plans.

CCMEP is also available to serve youth and lead agencies can provide supportive services and other services for youth during this time. Please see the [online activity guide](#) for some suggestions on online resources. Some suggested services and activities include online training available on OhioMeansJobs.com (see [OMJ Resources Guide](#)) to obtain a high school diploma by testing.

NEW! Is there flexibility to offer academic courses and/or training in a distance learning platform?

CCMEP provides flexibility to lead agencies in how they provide services. Lead agencies can choose the best method of continuing to deliver program services. The security of customer data and its transmission, as well as ease of customer access, must be considered.

Stay-at-Home Restrictions

Do the COVID-19 stay-at-home restrictions apply to OWF work eligible CCMEP participants?

Yes. OWF work eligible CCMEP participants negatively impacted by COVID-19 restrictions may qualify for good cause which should always be communicated to the cash assistance case managers on a timely basis to ensure these participants are not sanctioned inappropriately. Good cause hours should not be limited during this period.

Funding / Use of Funds

NEW! Can grant recipients, sub-recipients, and service providers continue to pay participants and/or employers if their work site is still shut down or training or work cannot be provided?

No. At the beginning of the pandemic, ETA allowed grantees to continue to pay WIOA title I participants for work experience (e.g., subsidized employment, on-the-job training, or paid internship) even if that work experience was curtailed, as long as the program participant's time commitment, stipend structure, and/or other academic or work terms were established before the national health emergency declaration, and only so long as the remainder of the established term. WIOA title I grantees have now had time to shift service strategies, and most participants are no longer working under terms established before the pandemic. Therefore, grantees can only pay participants for work experience when they are actually in a virtual, remote, or in-person work experience or participating in training as part of the work experience. (updated 11/16/2020)

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NEW! Can grant recipients continue to manage fiscal monitoring of sub-recipients remotely?

Monitoring and oversight can take many forms and may include remote or desk monitoring. The transmission of PII data may be done through encrypted email or cloud services, with the appropriate protections to prevent inappropriate disclosure.

NEW! Will WIOA Youth funding be received on time this year?

ODJFS and DOL are working to ensure a timely release of the WIOA Youth allocations.

NEW! Can funds from the WIOA Youth program be transferred to the WIOA Dislocated Worker program?

Response: No. This type of transfer is not allowed.

NEW! If services are disrupted for a few weeks, will WIOA Youth grantees be able to extend the period of performance to complete all planned grant activities?

ODJFS is allowing local areas to keep any unspent WIOA Youth funds for PY2018 to continue serving youth in PY2019.

Procurement

NEW! Can WIOA Youth procurement requirements be waived?

In accordance with [OMB Memorandum M-20-17](#), WDBs may conduct procurements under the public emergency provision ([2 CFR 200.320\(f\)\(2\)](#)). Grantees can waive the procurement requirements contained in [2 CFR 200.319\(b\)](#) regarding geographical preferences and [2 CFR 200.321](#) regarding contracting with small and minority businesses, women's business enterprises, and labor surplus area firms. Grant recipients are expected to use sound fiscal prudence to maximize value for each taxpayer dollar spent. These exceptions are time limited and will be reassessed by mid-June.

NEW! Can grantees use funds to purchase cleaning supplies?

Yes, to the extent that the supplies are used for the benefit of the grant program (e.g., in grantee spaces, or a proportionate share of shared spaces).

Work Experience

What work experience options can lead agencies use during COVID-19 restrictions?

Lead agencies should focus on employers that are still open for business like grocery stores, healthcare facilities, distribution centers, other essential industries. Please check Ohio's COVID-19 [website](#) for updates.

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There is an opportunity for participants interested in childcare who can provide child care in their homes to [obtain a temporary child care license](#) to serve parents in healthcare and other essential services.

There will be temporary positions available through the [Census](#) which is going forward as scheduled so far. Applicants must be 18 and are paid between \$14 and \$21 per hour depending on location. Most of these positions require a driver's license and vehicle. Also, some lead agencies and providers have hired CCMEP participants in the past to help with outreach, especially for out-of-school youth.

Also, please consider supportive services and incentives for meeting education and employment related goals. Incentives must be included in the participant's IOP.

How should current work experiences proceed during COVID-19 restrictions?

The health and safety of each participant and their families is the most important consideration and each work experience should be evaluated in consultation with the participant and/or parents if the participant is a minor. Some examples of things to consider are the employer's plans for ongoing operations, state restrictions on the business, the participant's willingness to continue in the work experience, transportation needs/availability and childcare needs/availability and social distancing advisories.

Many businesses are closing temporarily or may be impacted by COVID-19 in other ways including volume of work. Participants laid off due to COVID-19 may be eligible for [unemployment compensation](#) if they meet the minimum earnings and weeks worked requirements. (20 weeks of employment and an average weekly wage of \$269 see pages 14-16 of the [Worker's Guide to Unemployment Insurance](#).)

For work experiences that *are continuing* during this period of stay-at-home requirements; work experiences should continue if the participant is willing. If the participant is concerned and does not want to continue, the service can be placed on hold or ended depending on whether the work experience will continue after the COVID-19 restrictions will end. If the employer is having employees work from home, the participant could work from home and if needed could participate in online training resources through the employer or organized by the case manager since work experiences require an academic education component. This education component can include employability skills/job readiness training to prepare youth for work experiences as well as industry specific training (i.e., soft skills, working on a team, resume creation, practice interviewing, etc.). [OhioMeansJobs.com](#) has many resources available through its online training center and practice interview center. Also, participants can obtain a library card [online](#) from their local libraries to access [Ohio's subscription for LinkedIn's employment training site](#).

For work experiences that are *not continuing* during this period of stay-at-home requirements or afterward; participant work experiences could be extended by the lead agency with a focus on completing the required academic education component from home online. This training would be organized by the CCMEP case manager. This education component can include employability skills/job readiness training to prepare youth for work experiences as well

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as industry specific training (i.e, soft skills, working on a team, resume creation, practice interviewing, etc.). [OhioMeansJobs.com](https://ohiojobs.com) has many resources available through its online training center and practice interview center. Also, participants can obtain a library card [online](#) from their local libraries to access [Ohio's subscription for LinkedIn's employment training site](#).

For work experiences that are *reduced or temporarily deferred* but will continue after the *stay-at-home requirements are lifted*; the work experience could continue by having the participant focus instead on completing the required academic education component online. This training can be managed by the CCMEP case manager. This education component can include employability skills/job readiness training to prepare youth for work experiences as well as industry specific training (i.e, soft skills, working on a team, resume creation, practice interviewing, etc.). [OhioMeansJobs.com](https://ohiojobs.com) has many resources available through its online training center and practice interview center. Also, participants can obtain a library card [online](#) from their local libraries to access [Ohio's subscription for LinkedIn's employment training site](#).

NEW! Should states or local areas suspend all youth work experience during this crisis, or determine the best course of action depending on the youth and employer situations?

Local areas and lead agencies should follow CDC and state and local government guidance in making determinations related to whether youth and adults should still be participating on work experiences, and should consider the environment in which the work is being conducted, and the chance for virus transmission. DOL understands that many activities including work experience may be suspended or impacted.

NEW! Will relief on the out-of-school youth (OSY) 20% Work Experience expenditure requirement be provided by DOL?

DOL acknowledges work experiences for youth during this time period may be harder to provide. Program expenditures on this program element may include more than just wages paid to youth. Allowable expenditures may include items such as:

- Wages or stipends paid for participation in a work experience;
- Staff time working to identify and develop a work experience opportunity, including staff time spent working with employers to identify and develop the work experience;
- Staff time working with employers to ensure a successful work experience, including staff time spent managing the work experience;
- Staff time spent evaluating the work experience;
- Participant work experience orientation sessions;
- Employer work experience orientation sessions;
- Classroom training or the required academic education component directly related to the work experience;
- Incentive payments directly tied to the completion of work experience; and
- Employability skills or job readiness training to prepare youth for a work experience.

When determining the types of expenditures that are allowable to help meet this requirement, additional information can be found in [TEGL 08-15](#) and [TEGL 21-16](#), p.15. If local areas do not

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meet this requirement at the end of their period of performance, DOL will follow standard monitoring procedures for this program element.

Performance

NEW! What steps will ODJFS take to account for a decrease in performance across local areas as CCMEP services are disrupted for a significant period of time during the pandemic? Will lead agencies be penalized for performance issues?

The Departments of Education and Labor have issued guidance indicating that they understand the challenges local areas and states may face meeting Program Year (PY) 2019 negotiated levels of performance given the circumstances surrounding COVID-19. As a reminder for CCMEP, technical assistance will be provided any time a lead agency fails a performance measure. In addition, similar to WIOA, OWD uses a statistical adjustment model to calculate adjusted levels of performance at the end of the program year, which takes into account actual characteristics of participants served and the actual economic conditions experienced. OWD will continue to closely monitor the effect of the COVID-19 outbreak and its impact on services and performance outcomes. DOL has indicated that it will be monitoring impacts as well.

NEW! Does the WIOA statistical adjustment model address unusual situations such as what we are experiencing now with COVID-19?

The statistical model is intended to adjust for changes in economic conditions and participant characteristics; however, it is too soon to estimate the extent to which the models can address the effects of COVID-19 through these parameters. OWD will closely monitor the impact of COVID-19 on grantee performance and service delivery and take all necessary and available action to ensure objectively fair performance assessments in partnership with DOL.