



Ohio Department of Job and Family Services  
**COMPREHENSIVE CASE MANAGEMENT AND EMPLOYMENT PROGRAM  
(CCMEP) PLAN**

for

**County or Counties:** **MEIGS**

**Effective Date:** **October 1, 2017 through Septemebr 30, 2019**

**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.

## Table of Contents

1. Lead Agency and Coordination with Partners.....	3
2. Population Served.....	6
3. Coordination of Services.....	7
4. Outreach, Referral, and Eligibility.....	7
5. CCMEP Comprehensive Assessment and Individual Opportunity Plan (IOP)..	9
6. Program Services.....	18
7. Case Management.....	12
8. Performance Measures.....	13

## 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 Meigs County Department of Job and Family Services				
Lead Agency Address P O Box 191-175 Race Street		City Middleport	State Ohio	Zip Code 45760
First Name of Lead Agency Official Christopher	Last Name of Lead Agency Official Shank	Title of Lead Agency Official Director		
Phone Number 740 992 2117, ext 102		Email Address chris.shank@jfs.ohio.gov		

Program Contact Person Theresa Lavender		Phone Number 740 992 2117, ext. 127
Phone Number 740 992 2117, ext 127	Email Address theresa.lavender@jfs.ohio.gov	

Fiscal Contact Person Vincent Reiber	
Phone Number 740 992 2117, ext 109	Email Address vincent.reiber@jfs.ohio.gov

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

Agency Name Meigs County Department of Job and Family Services				
Agency Address P O Box 191-175 Race Street		City Middleport	State Ohio	Zip Code 45760
First Name of Lead Agency Official Christopher	Last Name of Lead Agency Official Shank	Title of Lead Agency Official Director		
Phone Number 740 992 2117, ext 102		Email Address chris.shank@jfs.ohio.gov		

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

Workforce Development Area 14	
Workforce Development Board Chair Name Robert Ogden	
Workforce Development Board Director Name Jean Demosky	
Phone Number 740 566-4395	Email Address jdemosky@athensoh.org

**1.4 Identify the implementation manager for the Lead Agency.**

First Name of Implementation Manager Theresa	Last Name of Implementation Manager Lavender	Title of Implementation Manager Program Administrator
Phone Number 740-992-2117, ext 127		Email Address theresa.lavender@jfs.ohio.gov

**1.5 Lead Agency’s performance and data management contact:**

Contact Person Theresa Lavender	
Phone Number 740 992 2117, ext 127	Email Address theresa.lavender@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:  
Meigs County Department of Job and Family Services is a quadruple combined agency consisting of the four major human services programs, Child Support, Public Assistance, Children Services and Workforce Development.

In Meigs County, the workforce development agency and the lead agency are one in the same. In other words, the Meigs County Department of Job and Family Services administers workforce development programs and is also the lead agency for CCMEP.

The Ohio Means Jobs center is co-located within the agency and follows the same guidelines, policies and principals as the department of job and family services. This co-location and unified chain of command allows for a more efficient operation of the workforce development programs and is easier for customers to be served as services are being provided in one location by staff who answer to one supervisor and one director.

The Meigs County Department of Job and Family Services already does some of the things now required by CCMEP. For example, there are established policies and procedures already in place between the OMJ center and the public assistance division. Generally, workers are cross-trained, or at a minimum, have knowledge of public assistance or workforce development activities.

In addition, since the lead agency and the OMJ center are the same staff, everyone is familiar with the policies and procedures necessary to have an effective program. With the implementation of CCMEP, the policies, procedures and referral process will need little modification to come into compliance with CCMEP.

Furthermore, “super teams” have been set up in the agency. These teams consist of worker from all four divisions. At team meetings, the hardest to serve cases are discussed and plans are made. By having a person from each division present, barriers can be eliminated, one point of contact is established and each case can be discussed thoroughly, bring about greater successes.

**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:

Businesses and employers needs will be the driving force behind the goals and objectives of the WDB. It will be up to the WDB to determine what programming and training is needed in the area. This needs assessment will be conducted with the assistance of the lead agency and the local OMJ center.

Meigs County Department of Job and Family Services is the former administrative agent for the board, so there is a great understanding of the role of the WDB and the lead agency. The local OMJ center actively plans and collaborates with the WDB in most areas. Board meetings are held at least quarterly and businesses are engaged locally at least quarterly by OMJ staff. Recruitment efforts are shared by the partners and the community partners work together daily to provide services to clients. Area 14 has common policies already in place for work experience and incentives.

Each county in Area 14 has business representatives on the WDB. By having these local contacts, collaboration with the entire WDB is easier. Generally, all the business partners have the same interests in mind, I.E., they want well trained and dependable employees. The OMJ centers can help deliver that to local employers and to the WDB.

**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:

The Meigs County Board of Commissioners designated the Meigs County Department of Job and Family Services to serve as the lead agency for CCMEP. The WDB is responsible to procure the WIOA youth program elements and will assist in the establishment of guidelines to ensure a uniform administration of CCMEP.

The Meigs County Department of Job and Family Services, aka, Ohio Means Jobs-Meigs County conducts all WIOA youth framework activities (including case management) which ties into the CCMEP model. The Meigs County Department of Job and Family Services, aka, Ohio Means Jobs-Meigs County has a long history of successful outcomes in youth programming and has been the youth provider, one-stop operator and provider of career services for many years. The WDB has provided the oversight of the OMJ center programs.

The Meigs County Department of Job and Family Services, aka, Ohio Means Jobs-Meigs County, along with the two other OMJ operators, Athens and Perry Counties use the TABE test for basic skills assessment. This tool is approved by the Department of Labor for WIOA programs. The CCMEP case managers have been trained to administer and interpret the TABE with the CCMEP participants.

WIOA eligibility determination is a part of the youth framework activities. All CCMEP case managers are trained in eligibility determination processes and paperwork for the WIOA youth program.

The Meigs County Department of Job and Family Services, aka, Ohio Means Jobs-Meigs County staff (CCMEP case managers) will perform all case management and CCMEP oversight. The Meigs County Department of Job and Family Services, aka, Ohio Means Jobs-Meigs County staff will ensure all data entry into OWCMS is complete. OWCMS is the state system used to collect and report data about the program.

The Workforce Development Board staff will conduct all monitoring required for CCMEP and WIOA vendors through a contract with a consultant. The consultant monitors the counties each year and provides a report.

All supportive services are provided by the local OMJ center or referred to community partners, such as the local job and family services if additional services are needed.

All follow up services are provided by the OMJ center staff or contracted staff and follow the applicable rules and regulations dictated by WIOA.

Each OMJ center has a "needs for additional assistance policy."

Each OMJ center has a form that each client signs as it relates to any relationships that may present a conflict as it relates to their eligibility.

See attached for list of policies.

**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.**

Adult Basic Literacy and Education (ABLE) Providers

Aspire is co-located in the OMJ center. Classes are held three days a week. Since co-location, the number of Aspire attendees have increased dramatically. With CCMEP, Aspire will be a large part of the services and since they are located one office down the hall from the CCMEP case manager, direct contact and referrals can be made easily.

Buckeye Hills is the Aspire provider.

Alcohol, Drug and Mental Health (ADAMH) Board

The ADAMHS board does not provide direct services; however, they do coordinate with drug and alcohol treatment providers. There are a number of these providers in Meigs County including TASC, Woodland Centers, Intergrated Services and Health Recovery Services. Relationships are already established with these providers and working with them through CCMEP will not be an issue. These providers are within a couple miles of the OMJ center and staff of the OMJ center has provided training to these providers as it relates to the programs and services we can offer to their clients.

The Gallia-Jackson-Meigs Board of Alcohol, Drug Addiction and Mental Health Services is the local agency serving Meigs County.

Businesses

The OMJ center will and has been engaged with the business community. In addition, OMJ staff routinely visit local businesses to check on any job openings and ask if the OMJ center can be of assistance. We anticipate this effort will intensify with CCMEP as we will need more employers and businesses available for employment opportunities.

In addition, the WDB is comprised of 51% business owners. The WDB will help guide the local provider of services and offer suggestions as to what types of trainings are needed. The agency intends to use businesses as internships, job shadowing, and paid and unpaid work experience, with the ultimate goal of finding as much employment as necessary for those enrolled in CCMEP.

Career and Technical Education

With efforts on short term, high demand occupational training, MCDJFS will work closely with local career and technical educational centers, including, but not limited to, Buckeye Hills Adult Technical Center, Tri-County Adult Career Center.

The local geographic area is served by three universities located in Ohio. They are, The Ohio State University, University of Rio Grande and Ohio University. Marshall University, located in West Virginia also serves the geographic area. In addition to the universities, there are two community colleges, Rio Grande Community College and Columbus State. Two technical schools, Hocking College and Washington State are also located within the geographic region.

All three counties in the geographic region have a university, community college, technical school or a branch campus in their respective county. Athens County has Ohio University and Hocking College, Meigs County has a branch of the University of Rio Grande and Perry County has a branch of Hocking College. Ohio University also has branches in Chillicothe, Lancaster and Zanesville. Marshall University has a branch in Point Pleasant, West Virginia which is located directly across the river from Meigs County. In addition, Tri-County Career Center is located in Athens County as well as Buckeye Hills Career Center, which is located in Gallia County.

All three counties in the geographic area are served by an Aspire program with both Athens and Meigs County operating the programs out of the Ohio Means Jobs Center (Meigs is operated by Buckeye Hills Career Center, but co-located in the OMJ Center) while Perry County's program is operated by the Muskingham Valley Educational Service Center (ESC.)

Athens County consists of five school districts, Meigs County has three and Perry County has four school districts. Athens and Meigs are served by the same ESC, while Perry is served by an adjacent ESC.

The geographic area has adequate educational agencies and post-secondary opportunities. All the universities, community colleges, technical schools and vocational schools are reached with an hour's drive depending where one lives and which school one attends. There are seven providers on the WIA eligible Provider Training list, which are based in the geographic area. However, there may be additional providers serving the area, but have their base of operations in a county outside the geographic area. There are 654 providers in total on the eligible training provider list for Ohio.

The geographic area has a number of post-secondary schools in the area. There are four Universities: University of Rio Grande, Ohio University, The Ohio State University and Marshall University, which is located in West Virginia. These institutions are within a 100 mile radius of the geographic area. There are two community colleges, Rio Grande Community College and Columbus State as well as two technical schools, Washington State and Hocking College. In addition, many of these schools have branch campuses located in their respective county or within a short distance. Three vocational schools are in the area:

Eastland-Fairfield Career & Technical Schools, Buckeye Hills Career Center and Tri-County Adult Career Center. Southern State Community College, located in Hillsboro offers CDL truck driver instruction and from time to time, holds these training sessions in the area.

Several ITAs are written to these institutions. We will continue are relationships with the institutions and view them as a way to provide long and short term training to those enrolled in CCMEP.

Child Care Providers

Our child care unit is located within the OMJ center. If child care is an issue for CCMEP participants, it can be easily resolved while they are at the office. There are a number of childcare providers to choose from, or if the participant wishes to have someone licensed, that can be done as well. The same supervisor oversees CCMEP and childcare, so there is a seamless transition and knowledge of both programs.

Child care staff are an active member of the “super team” as referenced in section 1.6.

Child Support Enforcement Agency

The CSEA is also located within the DJFS. CSEA can help modify orders, establish new orders or paternity and a variety of other things. It is the intent to work with CCMEP participants, if there are CSEA, issue to resolve them. Many times, a person gets behind in payments and then has issues with the court. By addressing the issues up front, some of the court action can be delayed, if they become employed, start making the payments. The CCMEP case manager came from the CSEA unit, so she has vast amount of knowledge and experience dealing with CSEA issues and has a working relationship with the CSEA unit, which will be beneficial in helping the CCMEP participants.

CSEA staff are an active member of the “super team” as referenced in section 1.6.

Children Services Agency

The PCSA is part of the local DJFS. The supervisor of PCSA is familiar with the CCMEP concept. It is anticipated that some of the CCMEP participants will have PCSA issues. As part of the PCSA case plan, elements of the CCMEP IOP can be incorporated. That way, a participant can fulfill both program requirements at the same time. For example, if a father who is involved with the PCSA for drug related issues, it may be those drug issues that is preventing him from working. By working together, the participant can receive the treatment he needs which will give him a better chance of having his children returned and will also give him a better chance at finding and maintaining employment.

Children Services staff are an active member of the “super team” as referenced in section 1.6.

Community College(s)

The geographic area has a number of post-secondary schools in the area. There are four Universities: University of Rio Grande, Ohio University, The Ohio State University and Marshall University, which is located in West Virginia. These institutions are within a 100 mile radius of the geographic area.

There are two community colleges, Rio Grande Community College and Columbus State as well as two technical schools, Washington State and Hocking College. In addition, many of these schools have branch campuses located in their respective county or within a short distance. Three vocational schools are in the area:  
Eastland-Fairfield Career & Technical Schools, Buckeye Hills Career Center and Tri-County Adult Career Center.

Southern State Community College, located in Hillsboro offers CDL truck driver instruction and from time to time, holds these training sessions in the area. There is also Washington County Career Center and Gallipolis Career College.

Several ITAs are written to these institutions. We will continue are relationships with the institutions and view them as a way to provide long and short term training to those enrolled in CCMEP

Community Action Agency

The local DJFS already has an established relationship with the CAA. CAA provides transportation services and Help Me Grow services, as well as HEAP, weatherization and help with utilities. The Non-Emergency Transportation helps transport clients to Medicaid eligible providers. If a CCMEP participant has medical, or drug and alcohol needs and unable to get to the appointments or counseling sessions, CAA can provide transportation. By having such a contract, a barrier is eliminated. In addition, the DJFS plans to coordinate and procure certain services from the local CAA. This could be anything from job readiness classes to other work related items.

Gallia-Meigs Community Action is the local agency serving Meigs County.

County Family Service Planning Committee

The JFS director, Family Children First Coordinator, Children Services Supervisor work activities supervisor and a community member, all serve on the planning committee. This committee is appointed by the county commissioners. This committee reviews the JFS Prevention, Retention and Contingency plan and makes recommendations.

Family and Children First Council

The Family and Children First Council is located within the DJFS office. The director of the DJFS serves on the Council and is part of the Executive Committee. CCMEP participants with children that could benefit from services coordination through FCFC will be referred. For example, if a parent enrolled in CCMEP is having significant behavioral or health problems with his or her child and that problem is a barrier to employment, FCFC service coordination may be able to help the family obtain a specialist or other professionals, which might be able to help. The FCFC may also be able to refer the family to childcare providers that have experience with children with behavioral or medical issues and in some instances, be able to help with transportation costs.

The FCFC coordinator for Meigs County is Brooke Pauley.

Juvenile Court System

There may be instances in which a child in a CCMEP family has issues with the juvenile court. The CCMEP case manager has experience working with the court and can try to address any issues which may come up. In addition, there are times in which the family has both Juvenile Court and PCSA issues.

A coordinated effort will be made to address those issues, see the PCSA section above. These are not juvenile justice services, coordination with the juvenile court in most instances would be with the diversion officer. Diversion is an allowable expense under TANF. Our services or case management would not be to supplant the juvenile justice services, but to coordinate with the diversion officer if needed.

The Honorable L. Scott Powell is the Juvenile Judge for Meigs County.

Local Healthier Buckeye Council

NA

Local School District(s)

All three school districts in Meigs County are active members of the community. MCDJFS has a good working relationship with the schools and the guidance counselors. Many referrals for services come from the school districts. From time to time, school board administrators come to WDB meetings for input or brief the board on training trends in the secondary school world.

Also, each superintendent serves on the FCFC and their guidance counselors come to team meetings, when necessary.

The superintendents are:  
Steve Ohlinger, Eastern Local; Scot Gheen, Meigs Local and Tony Deen, Southern Local.

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

OOD is a partner in the local OMJ center. Many referrals are already made to them. With the implementation of CCMEP, that is expected to continue.

Appointemnts are made as needed and a variety of OOD staff come to the OMJ center.

Other

HUD, to assist with housing.

## 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: 15-20

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

Please provide the anticipated number of volunteers the Lead Agency will serve annually in CCMEP: 50-75

### 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: 35-40

### 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 Meigs County Department of Job and Family Services is a quadruple combined agency administering the four-major core human services programs; Children Services, Child Support, Public Assistance and Workforce activities. The Meigs County Department of Job and Family Services is the lead agency for CCMEP.

Historically, MCDJFS has had a good relationship with local employers. Job fairs have been held, space has been provided to employer for interviews, on-the-job-training programs have been provided and many local businesses will hire someone just based off of our recommendation. The OMJ center also coordinates the work component of CCMEP.

Many of the local businesses utilize the OMJ center as their first point of contact. Seven businesses represent Meigs County on the Workforce Development Board. Many of these businesses are very active on the board and serve on sub-committees or special committees established by the Chair.

On occasion, the OMJ has been able to provide specialized training to meet the needs of employers. When new businesses open or consider Meigs County a location, OMJ staff will meet with them, offer our services and explain how we can help them be successful.

Before the advent of CCMEP, Meigs County was the administrative agency for Area 14. Therefore, there is a greater understanding of the role of the WDB and the local employers. Thus, the transition to CCMEP and the on-going relationship with the WDB and employers have been far easier.

The Meigs County Department of Job and Family Services assures that it is in compliance with 5101:14-1-03, the CCMEP program plan.

Furthermore, very few, if any sub-contractors, are used. However, when needed, their services are procured or referrals are sent to the appropriate service provider.

In addition to the above, The Meigs County Department of Job and Family Services conducts Workforce Wednesdays. This is an opportunity to high light a local business or schedule open interviews. This has been highly successful.

The Meigs County Department of Job and Family Services also has a strong relationship with the county commissioners who oversee the economic development office and the local chamber of commerce. This relationship allows the departments to co-mingle and explain services to potential employers.

#### 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:

In Meigs County, the workforce development agency and the lead agency are one in the same. In other words, the Meigs County Department of Job and Family Services administers workforce development programs and is also the lead agency for CCMEP.

The Ohio Means Jobs center is co-located within the agency and follows the same guidelines, policies and principals as the department of job and family services. This co-location and unified chain of command allows for a more efficient operations of the workforce development programs and is easier for customers to be served as services are being provided in one location by staff who answer to one supervisor and one director.

The Meigs County Department of Job and Family Services already does some of the things now required by CCMEP. For example, there are established policies and procedures already in place between the OMJ center and the public assistance division. Generally, workers are cross-trained, or at a minimum, have knowledge of public assistance or workforce development activities.

In addition, since the lead agency and the OMJ center are the same staff, everyone is familiar with the policies and procedures necessary to have an effective program. With the implementation of CCMEP, the policies, procedures and referral process will need little modification to come into compliance with CCMEP.

In addition, with services being co-located, clients will receive coordinated services, linkages to job market information, access to CCMEP services, services for non-eligible youth or CCMEP and co-location, within, the same facility of WIOA, CCMEP and DJFS staff. This streamlines the process.

As for sub-contracting, there is none or very little.

The OMJ center also coordinates the work component of CCMEP. If other services are needed, for example GED, housing, tutoring the agency connects with the appropriate resource and that resource provides the service.

As for the work component, the agency tries to schedule it so it falls in the summer months consistent with past practices. The work component is administered by the case workers. In 2017, 45 CCMEP participants were served and around 15 employers were used.

This summer component helps market the program and allows businesses to see what the OMJ has to offer.

## 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: Job fair

#### 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:

Since the lead agency for CCMEP is also the DJFS, an internal procedure has been created to assure the referral is sent within 7 days. The CCMEP caseworker and the work activities coordinator will communicate on a daily basis to make sure all those eligible are referred.

In the case of Meigs County, the CCMEP population is estimated to be between 30-40 individuals. CCMEP caseworker will complete the comprehensive case management assessment (JFS 03003) to determine barriers to employment. The Individual Opportunity Plan will then be developed (JFS 03004) with strategies to reach employment goals for self-sufficiency.

In CCMEP, the individual will undergo a comprehensive assessment which will be used to identify necessary services and will be the foundation of the individual opportunity plan (IOP). The IOP replaces the current self-sufficiency plan the individual signed to receive cash benefits. The IOP will be the contract between the individual and the agency to allow the individual to continue to receive cash benefits.

If the individual does not participate in the IOP (e.g., does not attend services and activities without good cause), the individual may be sanctioned, just like an individual may be sanctioned for not adhering to the self-sufficiency plan.

Referrals will be sent via internal mail, e-mail or hand delivered. It is also anticipated that when a work required individual is identified, the CCMEP caseworker will be present so everyone is hearing the same message and know whom the primary point of contact will be.

#### 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:

The work activities supervisor will track program participant's number of months used. The work activities supervisor will communicate with the CCMEP case manager prior to 36 month time limit. This will occur around the 30th month. The CCMEP case manager will utilize TLAG in CRISE to track months used and as the CCMEP participant nears the 30th of 36 months, priority will be given to those near the limit so the client is prepared for employment or the possibility of employment once the cash assistance is exhausted.

- 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:

Both the work activities supervisor and the CCMEP caseworker will communicate with each other either by phone or in-person, when it is determined that a client may be a victim of domestic violence.

This information may be relevant as it relates to required hours and for the safety of the participants and the agency staff. If domestic violence is a barrier, the CCMEP case worker can work with the local victims advocate to develop other resources.

- 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:

Since the lead agency for CCMEP is also the DJFS, an internal procedure has been created to assure the referral is sent within 7 days. The CCMEP caseworker and the work activities coordinator will communicate on a daily basis to make sure all those eligible are referred.

In the case of Meigs County, the CCMEP population is estimated to be between 40-50 individuals. CCMEP caseworker will complete the comprehensive case management assessment (JFS 03003) to determine barriers to employment. The Individual Opportunity Plan will then be developed (JFS 03004) with strategies to reach employment goals for self-sufficiency.

In CCMEP, the individual will undergo a comprehensive assessment which will be used to identify necessary services and will be the foundation of the individual opportunity plan (IOP). The IOP replaces the current self-sufficiency plan the individual signed to receive cash benefits. The IOP will be the contract between the individual and the agency to allow the individual to continue to receive cash benefits. If the individual does not participate in the IOP (e.g., does not attend services and activities without good cause), the individual may be sanctioned, just like an individual may be sanctioned for not adhering to the self-sufficiency plan.

Referrals will be sent via internal mail, e-mail or hand delivered. It is also anticipated that when a work required individual is identified, the CCMEP caseworker will be present so everyone is hearing the same message and know whom the primary point of contact will be.

The interim report model will be used in CCMEP. This will be done every six months by the CCMEP caseworker. It will be used for those who are TANF eligible, but not receiving assistance (OWF). In addition, during the six-month review, 200% of poverty will be looked at as well as any documentation for work-required cases, such as CRISE screens, AEWAA, IQEI, and IQCP. This review by the CCMEP will take place informally during each visit and formally every sixth visit, based on one visit per month model.

A CCMEP worksite will be created in CRISE (WPEL) for OMJ Center. This site will generate a work slip that is the same as other sites. This way, there is a standard form being used. The CCMEP caseworker will use the work slip to track hours and participation. If a CCMEP client fails to meet the CCMEP required activities, the CCMEP caseworker will return the work slip, marked "failed hours" to

the work activities supervisor. It is then the responsibility of the work activities supervisor to impose a sanction on the client. This will be done within 10 days.

The work activities supervisor will track program participant's number of months used. The work activities supervisor will communicate with the CCMEP case manager prior to 36-month time limit. This will occur around the 30th month. The CCMEP case manager will utilize TLAG in CRISE to track months used and as the CCMEP nears the 30th of 36 months, priority will be given to those near the limit so the client is prepared for employment or the possibility of employment once the cash assistance is exhausted.

This will be accomplished by adding the CCMEP caseworker into "casebank". By doing this, the CCMEP caseworker can see what documents or activities have occurred in the case. She will also be able to do it in the reverse, any information the CCMEP caseworker gets, the work activities unit will see it as well.

The work activities supervisor is responsible for monitoring the FLSA allowable monthly hours. If and when the monthly benefit amount changes, the CCMEP case worker and the work activities supervisor will communicate the change. The work activities supervisor monitors and issues sanctions, determines good cause, reviews compliance activities and other factors.

As the CCMEP case worker will be meeting once a month with the participant, one of the things that will be asked is "are there any changes to your case" if no, things will proceed as normal, if yes, change will be noted and communicated to all those requiring the information.

Within 10 days of the referral, the CCMEP caseworker will schedule a visit. A face to face interview with the participant will be conducted to include an explanation of CCMEP, goals, objectives and expectations as well as conducting the assessment.

Once the assessment has been completed, and goals identified, the CCMEP case worker and participant will move on to the completion of the IOP. By doing this together, the CCMEP participant has a sense of participation and is able to drive the process. That way it will be meaningful to the participant and there is a greater chance of success.

The TABE test is the tool used in the basic skills assessment. The TABE is administered by the CCMEP case worker at the OMJ center. The TABE test is the tool used by Area 14.

All OWF and SNAP rules and regulations are followed.

Furthermore, the Meigs County Department states it has or is in the process of developing the following:

- 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.

- 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:  
CCMEP transfers will occur in the same manner as all other public assistance case transfers. It will be done electronically or in some instances, the hard copy case will be sent. When a case is transferred in, the CCMEP caseworker will contact the participant and schedule an appointment within ten days to review the previous IOP or to develop a new one.

**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:  
A household is determined by the amount of support that is offered by the parents. For example, if the parents are providing less than 50%, the participant is considered a household of one and the eligibility for that size of household is used. In the event, the parents are providing more than 50% support, then the household is considered three, (based on a two parent example) and the guidelines for that household size is used.

A family is defined as two or more persons related by blood, marriage, or decree of the court, who are living in a single residence and are included in one or more of the following categories: two spouses and dependent children, a parent or guardian and dependent children; and/or two spouses.

Low income individuals are defined as: received TANF, SNAP or SSI in the past six months, the total family income does not exceed the poverty line or 70% of the lower living standard income level, is a homeless individual, receives or is eligible to receive free or reduced lunch, is a foster child or 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 the requirement.

For the purposes of counting income, all household income is used to determine eligibility. TANF eligibility is verified by the income maintenance supervisor.

In addition, OAC 5101:10-3-01 Workforce Innovation and Opportunity Act youth program eligibility requirements are followed when determining youth eligibility.

**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.**

- Yes, the Lead Agency is forming 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.

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

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

Describe:

MCDJFS assures that a qualified, trained CCMEP caseworker is conducting the assessment. The worker began working on CCMEP in October 2015 and has been involved in the development of the program since the beginning.

Within 10 days of the referral, the CCMEP caseworker will schedule a visit. A face to face interview with the participant will be conducted to include an explanation of CCMEP, goals, objectives and expectations as well as conducting the assessment.

Once the assessment has been completed, and goals identified, the CCMEP case worker and participant will move on to the completion of the IOP. By doing this together, the CCMEP participant has a sense of participation and is able to drive the process. That way it will be meaningful to the participant and there is a greater chance of success.

The TABE test is the tool used in the basic skills assessment. The TABE is administered by the CCMEP case worker at the OMJ center. The TABE test is the tool used by Area 14.

### 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:

The TABE test is used by the OMJ center in Meigs County. It is also the tool used by Area 14.

### 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.

The CCMEP case manager will engage participants every 30 days. This is tracked by the CCMEP case manager using an Excel spreadsheet or the Microsoft Outlook calendar.

The supervisor also tracks the 30 days by using the same tools and reminds the case manager if the 30 day limit has been reached.

As for engagement, a variety of techniques are used including face to face, telephone or other forms of communication. If the participant is not engaging, home visits or visits to the school are approved. The most successful engagement tool is the use of incentives. Incentives can be earned for follow-up, engagement, good school grades or retaining employment.

Several attempts are made to keep the participant engaged before the person is exited the program.

## 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) 2

Describe:

Tutoring, study skills training, instruction and dropout prevention, to be provided by ASPIRE.

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

Describe:

Alternate secondary school services or dropout recovery services to be provided by ASPIRE or the local school districts.

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

Describe:

Paid and unpaid work experiences can be provided by any public or private sector employer and as the lead agency, we coordinate the work experience and assure academic and occupational education component is addressed.

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

Describe:

Occupational skills training to be provided by the lead agency.

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

Describe:  
Education offered concurrently with workforce preparation activities to be provided by the lead agency.

6. Leadership development opportunities – TANF Purpose(s) 1, 2 and 4

Describe:  
Leadership development opportunities to be provided by any mental/behavioral health agency, civic organization with the expertise or through partnerships with other agencies whether public or private.

7. Supportive services – TANF Purpose(s) 1, 2, 3 and 4

Describe:  
Supportive services to be provided by the lead agency through the CCMEP plan which details allowable expenses.

8. Adult mentoring – TANF Purpose(s) 1, 2, 3 and 4

Describe:  
Adult mentoring opportunities to be provided by any mental/behavioral health agency, civic organization with the expertise or through partnerships with other agencies whether public or private, such as Big Brothers Big Sisters.

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

Describe:  
Follow-up services for not less than 12 months to be provided by lead agency.

10. Comprehensive guidance and counseling – TANF Purpose(s) 1, 2, 3 and 4

Describe:  
Comprehensive guidance and counseling opportunities to be provided by any mental/behavioral/alcohol/drug addiction services. Career counseling to be provided by OMJ center or OMJ partners.

11. Financial literacy education – TANF Purpose(s) 1, 2 and 4

Describe:  
Financial literacy and education to be provided by Community Action, OSU extension, behavioral/mental health agencies or financial institutions in the county.

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

Describe:  
Entrepreneurial skills training to be provided by the local economic development office or chamber of commerce.

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

Describe:  
Labor market and employment information to be provided by the lead agency.

14. Post-secondary preparation and transition activities – TANF Purpose(s) 2 and 4

Describe:  
Activities to prepare for and transition to post-secondary education and training to be provided by the lead agency.

**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:

Program participants will not be paid directly. Typically, MCDJFS has a MOU with employers that describe the reimbursement process. Laid out in the MOU are the hourly rate, fringes and reimbursement schedule along with what documentation is required for reimbursement. MCDJFS pay the employer directly, not the employee.

**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:

Supportive services will be capped at \$5,000 per participant to complete any of the 14 WIOA elements. These supportive services will include such things as housing, rent and deposits, work related items, automobile repair or other services deemed appropriate by the CCMEP staff. These supportive services are paid for by the CCMEP allocations under TANF or WIOA. These are not Prevention, Retention and Contingency (PRC) services under the PRC plan.

In addition, for TANF eligible participants, there is the PRC plan. This plan is similar to the CCMEP supportive plan and pays for similar items and can be utilized for TANF eligible clients.

Other community resources may be tapped into in the unlikely event the CCMEP or TANF plan does not cover a situation. Counties have at their disposal local or county general revenue funds that may be used, however, this would be worst case scenario.

In addition, no more than 4 months of assistance can be provided in a row. This is deemed ongoing assistance and is unallowable under TANF rules.

**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:

Individuals may opt out of the program on their own. There is no penalty to them provided they are not enrolled in OWF or SNAP. Should a participant wish to opt out or is considering the possibility, the case manager will try to meet with the participant and explain the benefits of staying in the program. This conversation may include what supportive services can be offered and what other services may be provided should the participant wish to remain enrolled.

When a participant opts out or cannot be located, written documentation and written appointment letters are the formal mechanism used to notify the participant, however, texts, e-mails or phone calls may also be utilized to reach a participant who has failed to follow-up. These are not primary tools, but secondary tools used to try to increase the likelihood of reaching the participant.

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

Describe:

Good cause may include but is not limited to domestic violence issues, court ordered appearances, lack of child care, death or serious injury or illness to an immediate family member. Other reasons will be addressed on a case by case basis.

Depending on the type of good cause, for instance, if it is DV issue, the agency may choose to take a self-assessment or ask the participant to provide a copy of the protection order.

In other instances, documentation may be required such as subpoena or other court document detailing when and where the participant must appear in court.

Good cause will be determined within 7 days of the failed hours or before it is submitted to the work activities supervisor for a proposed sanction.

All documentation is in the written letter form.

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

Describe:

Program participants will receive written notice of a scheduled appointment within 7 calendar days of the appointment unless the participant agrees to waive the notice. The written notice will be mailed to the current address on file.

**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:

Aspire, formerly known as ABLE, is co-located within the OMJ center. In person referrals are made to Aspire as the need arises. Services are discussed with the participant by both the Aspire staff member and a member of the lead agency, to insure the participant knows what options are available.

**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:

The lead agency is prohibited from being involved in the procurement of services if the lead agency plans on responding to the Request for Proposals (RFP). The lead agency cannot bid on a RFP it helped develop because it would be a conflict of interest and WIOA rules and regulations prohibit such conflicts. If the lead agency chooses not to bid on the RFP, then it is acceptable for the lead agency to be involved in the development and review of any submitted proposals.

In Area 14, The Workforce Development Board(WDB) issues an RFP, a committee appointed by the Chair, will then review the proposals, score the proposals and make recommendations to the full Board. Once the WDB votes to accept a proposal, ultimately, the board of county commissioners, in each county, awards the contract.

Historically, the OMJ centers have always been the provider of career services, youth and adult and dislocated services. The Ohio Means Job Centers will work together with the WDB and make suggestions for training or provide information on the job market which will better assist the WDB to make informed decisions.

In Area 14, a resolution has been adopted by the WDB authorizing the use of CCMEP and TANF funds for serving participants.

The CCMEP plan is the guiding document that describes how the lead agency and WDB collaborates on CCMEP and TANF services. Each county is required to develop and submit it for signature by the WDB Chair. Once that is done, the CCMEP plan is submitted to the Ohio Department of Job and Family Services for approval and every two years the plan is updated.

**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:

The lead agency does not require any specific training for case managers, however, each case manager has attended or will attend any trainings, conference and/or meetings sanctioned by the Ohio Department of Job and Family Services or similar organizations such as the Workforce Directors Association or trainings sponsored by other workforce areas.

**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 checked="" type="checkbox"/> Between 15 and 25 cases | <input type="checkbox"/> 100 cases or more        |
| <input 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:

Surveys are used as the formal tool to gain feedback. This information is used to make program improvements or address any shortfalls. Generally, surveys are conducted quarterly.

**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:

The CCMEP case manager and supervisor meet on a monthly basis to staff cases and meet on a regular basis to go over rules, procedures, etc.

In addition, the CCMEP case managers attends the Area 14 meeting of county coordinators. This group meets quarterly.

Furthermore, case managers and the supervisor are evaluated annually regarding his/her performance. Throughout the year, if any problems issues or concerns arise, it is handled quickly to prevent disruption or ineffective services. Case managers are also free to discuss successes and make valuable suggestions to for program improvement. Agency director meets with supervisor and workers on an as needed basis.

## 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?

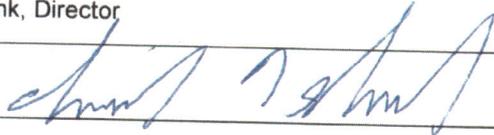
In addition, ODJFS also matches case records with data from various sources. Some post-exit program participant accomplishments (e.g., degree attainment) may not be captured this way.

Describe:

Any supplemental data collected will be placed in the case file, entered into OWCMS and date stamped. This supplemental data will be used to track performance measures or verify performance not already captured by the ODJFS system.

## 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 Christopher T. Shank, Director	
Signature 	Date 12-19-17

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

Name and Title Robert Ogden, Chair	
Signature 	Date 12-29-17

# Area 14 Workforce Development Board

---

Area 14 Workforce Development Board

Rights Dissemination / Complaint Procedures

Area 14 Policy 16-02

Effective August 4, 2016



---

## I. Purpose

It is the intention of the Area 14 workforce development system to ensure customer rights are both known by those participating in WIOA funded services, and protected by the service providers within this system. To comply with conditions for receipt of federal financial assistance, Area 14 establishes and maintains procedures for the receipt, investigation, and resolution of complaints.

It will be the policy of the Area 14 Workforce Development Board (WDB) to follow the most recent State issued Complaint Procedures Manual and require each registered participant file contain a signed (by the participant) copy of the state issued, “Your Complaint Rights” form, allowing for customization of said form to align with each individual county’s information.

## II. Effective

Immediately

## III. Requirements

The Area 14 workforce development system will follow all state policies on the state policy page pertaining to participant complaints and grievances. At the time of publication, this page is located at [http://jfs.ohio.gov/owd/WorkforceProf/policy\\_info.stm](http://jfs.ohio.gov/owd/WorkforceProf/policy_info.stm). The combination of federal, state and local policy will govern the topic addressed.

All individuals participating in the local workforce development system should be treated fairly and with respect, and shall be informed of their rights and responsibilities. It is the policy of the WDB to utilize the State issued Complaint Procedures Manual as the tool to detail and explain the rules and regulations, including the process and timeframes to resolve program complaints if they occur.

To ensure participants are aware of their rights and responsibilities, each participant shall be provided the state issued “Your Complaint Rights” form to communicate types of complaints and contact information for resolution. This form shall be customized by each Ohio Means Jobs center to include local contact information and ensure that the customer signature is on the application acknowledging receipt of this form.

# Area 14 Workforce Development Board

---

Although individuals interact with our programs and services in a variety of ways every day, and all should be treated fairly and with respect, the requirement to obtain a signed “Your Complaint Rights” form only applies to participants in our workforce development system that are “enrolled” in a WIOA funded service.

As identified in WIOAPL 15-08, “Career Services for Adult and Dislocated Workers” WIOA proscribes varying levels of service within the workforce development system. Participants receiving “basic” career services are not required to be tracked via separate participant file or enrollment into the WIOA program, and the “Your Complaints Rights” form is not required to be signed. When a participant transitions beyond basic career services into “individualized” career services, or receives “individualized” career services without first receiving “basic” career services, then they are then considered a registered WIOA participant and their file must contain a participant signed copy of the “Your Complaint Rights” form.

As identified in WIOAPL 15-10, “Youth Program Services,” youth program participation is 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. Once the eligibility documentation begins, the individual rights and the process to express a complaint are to be explained to the individual and their parent/guardian, if the individual is a minor. At this point their file must contain a copy of the “Your Complaint Rights” form, signed by the participant, and their parent/guardian if a minor.

## **IV. Complaint Procedures and Designation of Area Officers**

If a complaint is filed, providers will follow the most recent State issued Complaint Procedures Manual. As a requirement of this policy, each Program Operator must maintain four local roles: the Hearing Officer and Equal Employment Opportunity Officer, and an alternate for each. The position of Hearing Officer and Equal Employment Opportunity Officer must be named within each county. However, the alternate for each may be appointed at the discretion of the Director/Administrator within each Program Operator, to be determined as needed based on staff availability and to meet the needs of the service provider.

The processes for complaints and timeframes that these officers will use are detailed in the State issued Complaint Procedures Manual.

# Area 14 Workforce Development Board

---

## Area 14 Workforce Development Board

Local Workforce Development Board Member  
Conflict of Interest Policy

Area 14 Policy 15-01

Effective August 27, 2015



---

### **Purpose**

1) To outline the Board's approach in identifying and evaluating potential conflicts of interest and assisting its members in addressing conflict of interest issues before a member takes an official action that might result in a breach of trust. 2) Ensure that individuals or representatives of organizations entrusted with public funds will not personally or professionally benefit from the award or expenditure of such funds.

### **Definitions**

*Conflict of Interest: An individual would personally benefit, usually monetarily, from his or her inclusion in the decision making process.*

*Immediate Family: Immediate family consists of the individuals' parents (including step-parents), spouse, domestic partner, children (including step-children), siblings, grandchildren, grandparents, and any relative by marriage (an 'in-law').*

*Individual: An employee, officer, board member or agent of Area 14 Workforce Policy Board.*

*Partner: A business associate of an individual, whether an equal participant in a business with the individual, a supervisor or sub-ordinate.*

It is the responsibility of the Board to guard against conflicts of interest that might compromise its integrity and objectivity. Board members must ensure the integrity of their pursuits by taking steps to avoid a conflict of interest, or even the appearance of a conflict of interest. Because the complexity and diversity of personal and business relationships are extensive, and the perception of a conflict of interest may vary from one individual to another, the most effective means to address a conflict of interest is to establish a system under which Board members disclose potential, material conflicts before taking official board action.

### **Procedure**

Before any matter is brought before the Area 14 Workforce Policy Board for action, an individual who believes they may have a conflict of interest must announce that fact to the voting body and excuse themselves from any further discussion and/or vote on the matter in question.

No individual shall participate in the selection, award, or administration of a contract supported by WIA if a real or apparent conflict of interest would be involved. Such a conflict would arise when the individual, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in the firm selected for an award. The individual shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, or parties to sub agreements.

---

I have read the Conflict of Interest Policy and agree to comply fully with its terms and conditions at all times during my service as Area 14 Workforce Development Board member.

---

Board Member Signature

---

Date

# Area 14 Workforce Development Board

---

## Area 14 Workforce Development Board

Local Workforce Development Board Member  
Conflict of Interest Policy

Area 14 Policy 15-01

Effective August 27, 2015



---

### **Purpose**

1) To outline the Board's approach in identifying and evaluating potential conflicts of interest and assisting its members in addressing conflict of interest issues before a member takes an official action that might result in a breach of trust. 2) Ensure that individuals or representatives of organizations entrusted with public funds will not personally or professionally benefit from the award or expenditure of such funds.

### **Definitions**

*Conflict of Interest: An individual would personally benefit, usually monetarily, from his or her inclusion in the decision making process.*

*Immediate Family: Immediate family consists of the individuals' parents (including step-parents), spouse, domestic partner, children (including step-children), siblings, grandchildren, grandparents, and any relative by marriage (an 'in-law').*

*Individual: An employee, officer, board member or agent of Area 14 Workforce Policy Board.*

*Partner: A business associate of an individual, whether an equal participant in a business with the individual, a supervisor or sub-ordinate.*

It is the responsibility of the Board to guard against conflicts of interest that might compromise its integrity and objectivity. Board members must ensure the integrity of their pursuits by taking steps to avoid a conflict of interest, or even the appearance of a conflict of interest. Because the complexity and diversity of personal and business relationships are extensive, and the perception of a conflict of interest may vary from one individual to another, the most effective means to address a conflict of interest is to establish a system under which Board members disclose potential, material conflicts before taking official board action.

### **Procedure**

Before any matter is brought before the Area 14 Workforce Policy Board for action, an individual who believes they may have a conflict of interest must announce that fact to the voting body and excuse themselves from any further discussion and/or vote on the matter in question.

No individual shall participate in the selection, award, or administration of a contract supported by WIA if a real or apparent conflict of interest would be involved. Such a conflict would arise when the individual, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in the firm selected for an award. The individual shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, or parties to sub agreements.

---

I have read the Conflict of Interest Policy and agree to comply fully with its terms and conditions at all times during my service as Area 14 Workforce Development Board member.

---

Board Member Signature

---

Date

# Area 14 Workforce Development Board

---

Area 14 Workforce Development Board

On-the-Job Training Policy

Area 14 Policy 16-03

Effective August 4, 2016



---

## I. Purpose

To establish guidance for entering into On-the-Job Training, hereinafter “OJT”, contracts with employers to provide occupational skill training to eligible WIOA participants, across all funding streams and programs. All OJT contracts must primarily benefit the WIOA participant in the acquisition of skills and abilities for performance in the specified occupation.

## II. Effective

Immediately

## III. Requirements

Through OJT activities provided under the Workforce Innovation and Opportunity Act (WIOA), adult, dislocated worker, and youth participants have the opportunity to obtain skill sets necessary to fill jobs that are locally available, as well as new positions being created. With an OJT contract, the employer is the training provider. During the training, the participant is engaged in productive work in a job for which he or she is paid, and the training provides knowledge or skills necessary to the full and adequate performance of the job. Employers must commit to hire and retain the participant at the end of a successful training period.

### A. **Participant Eligibility for an OJT**

WIOA-funded On-the-Job Training is available for eligible WIOA youth and unemployed or under-employed adult and dislocated workers. Employed workers may be eligible for WIOA-funded OJTs when the employee is not earning a self-sufficient wage as determined by the Area 14 Workforce Development Board policy. Participants who have completed occupational skills training via an individual training account (ITA) may be considered for OJT if it creates an opportunity for the participant to become employed.

As outlined in Workforce Innovation and Opportunity Act Policy Letter (WIOAPL) No. 15-09, Training Services for Adults and Dislocated Worker, and WIOAPL No. 15-10, Youth Program Services, training services may be provided to adults and dislocated workers, and youth participants if, after an interview, evaluation, or assessment and career planning, the participant has been determined to have the skills and qualifications to successfully participate in an OJT. WIOA in-school youth aged 14-21 years may qualify for OJT, although such training may not be an appropriate activity for in-school youth whose individual service

# Area 14 Workforce Development Board

---

strategy (ISS) may be geared toward completion of secondary or postsecondary education instead of employment.

OJT participants must receive wages, benefits, and working conditions that are equal to those provided to regular employees who have worked a similar length of time and are doing the same type of work. Appropriate workers compensation insurance protection must also be provided to all OJT participants by the employer. OJT participants are not eligible to receive Needs Related Payments (NRPs) and cannot be immediate family members of the business owner or direct supervisor. Refer to the On-The-Job Training Guidance Manual for the different situations in which OJT-related conflict of interest may arise.

## **B. Employer Eligibility for an OJT**

### Disqualifying Factors

Employers will be disqualified from participating in the OJT program in the following situations:

1. Businesses must not be presently debarred, suspended, proposed for disbarment, declared ineligible, or voluntarily excluded from participation in transactions by USDOL or the State of Ohio. Below are three websites that may be helpful in checking tax, environmental compliance, and debarment status.

Federal Debarment Site: <http://www.sam.gov>

Ohio Department of Taxation: <http://www.tax.ohio.gov>

Business Filing Search: <http://www.sos.state.oh.us>

2. Businesses must not have any outstanding tax liability for over six months to the state of Ohio. Business are required to disclose any known outstanding tax liabilities with Ohio and other states prior to entering into contract. Existing out-of-state violations may be considered by the WIOA Program Operator when determining eligibility to receive OJT funds. The WIOA Program Operator must document any resolution of outstanding tax liability, which may include letters from the business or from the State from which the tax liability occurred.

3. Businesses must not have any outstanding civil, criminal or administrative fines or penalties owed to or pending in the state of Ohio.

4. The WIOA Program Operator must not enter into an agreement with an employer who has previously exhibited a pattern of failing to provide OJT participants with continued long-term employment.

5. The employer must comply with all applicable federal, state, local laws and regulations related to providing reasonable working conditions. OJT participants are not permitted to train or work in buildings or surroundings under working conditions that are unsanitary, hazardous, or dangerous to the trainee's health or safety.

6. If during completion of the employer information form, it is determined that a business has relocated from one U.S. labor market to another and caused dislocation at the original location, OJTs may be available at the new location only after the business has conducted work at the new location for more than 120 days. Refer to the On-The-Job Training Guidance Manual for factors to be considered in determining whether business relocation has occurred.

To verify that a business is not relocating employment from another area, a pre-award review must be undertaken and documented by the WIOA Program Operator. The review must include the names under which the establishment conducts business, including predecessors and successors in interest; the name, title, and address of the company official certifying the information, and whether WIOA assistance is being sought in connection with past or impending job losses at other facilities of their company. The pre-award review should also include a review of whether appropriate notices have been filed, as required by the Worker Adjustment Retraining Notification (WARN) Act. The review may also include consultations with labor organizations and others in the affected local area(s).

7. Absent a clear and applicable layoff definition within a collective bargaining agreement or personnel policy governing a local operation, a layoff is defined as termination with the intent to recall. A laid off

# Area 14 Workforce Development Board

---

employee who refuses a recall request is no longer considered to be in layoff status. Layoff recall rights will last six months from the last day of work prior to the layoff.

If the employer has laid off someone from a similar or "substantially equivalent" work at the same local operation, no OJT or other subsidized employment is permitted. The work is considered substantially equivalent if the overlap between the work (duties and job titles) is 80% or greater. If more than one person is laid off from a substantially equivalent job, and all these persons worked their last day more than six months before the training plan begins, the OJT may proceed and the employer may be reimbursed regardless of the previous layoffs.

8. Training positions covered may not have been created by the displacement of an unsubsidized employee by a WIOA subsidized employee. This includes partial displacement such as reduction in the hours of non-overtime work, wages, or employment benefits. There is no requirement for the job to be similar or substantially equivalent. The key is employer intent: if an unsubsidized employee's earnings are reduced by hiring a WIOA subsidized participant to offset the lost productivity, it is considered displacement.

## Prohibited OJT Activities

The following types of activities are prohibited from OJTs:

Sectarian activities: Funds provided to employers for OJT may not be used to employ the participant/trainee in a position involving political or sectarian activities. Furthermore, OJT participants may not assist, promote or deter union organizing, or engage in political activities during work hours.

Religious activities: OJT participants are prohibited from being employed in the construction, operation, or maintenance of any facility which is used for religious instruction or worship.

## C. Employer Contracting and Reimbursement

OJT training payments to employers are deemed to be compensation for the extraordinary costs associated with training participant and potentially lower productivity. Employers are to be reimbursed up to 50 percent of the wage rate of an OJT participant.

The *OJT Agreement* must state the agreed upon maximum amount that WIOA will reimburse an employer per trainee during the contract period, not to exceed **\$8,000 and/or 13 weeks per OJT contract, and payments can be no more than 50% of each trainee's straight worked compensation**. This does not include: holiday, sick, personal, vacation or other unworked compensation. All worked hours can be reimbursed at the trainee's normal rate of pay at the time worked (Extra employer payments for overtime, shift deferential, piece incentive, etc. are not reimbursed).

The minimum hours that can be set in the *OJT Agreement* are 160 total hours. The maximum hours that can be set in the *OJT Agreement* are 520 total hours.

The hours set in the *OJT Agreement* are the maximum hours reimbursed and are determined by an evaluation of the trainee's skills/aptitudes at date of hire and the tasks identified in the training outline.

Evaluations must be completed at approximately the midpoint of contract and contract completion and contained in the trainee's WIOA file.

The participant must receive a wage of **at least \$9.00 per hour from the employer, and this wage must be aligned with other employees performing the same duties**.

# Area 14 Workforce Development Board

---

For a currently employed trainee not currently earning locally defined self-sufficient wages, there must be an expectation that at successful completion of the OJT there will be a **wage gain of at least \$1.00/hour**.

## IV. Signatory Authority / Monitoring

The Area 14 Workforce Development Board is committed to utilizing OJT contracts as a means for individuals to build their skills, reestablish themselves in new fields and increase employment retention and self-sufficiency. Our board also recognizes the importance in OJT's to provide an incentive to employers to hire using the public workforce system and to invest in employee skill development. In an attempt at streamlining and expediting the process to award OJT contacts, local forms may be created to allow the supervisor/administrator of the WIOA Program Operators to act as signatory authority.

Although the local workforce board is not required to sign off on OJT contracts, awards, invoices, etc., to ensure the board is engaged and providing oversight to the OJT process, each WIOA Program Operator shall make available at the Executive Director of the Workforce Development Board's discretion, all contracts, forms, files, etc. to be reviewed and monitored to ensure compliance with this policy and all applicable federal/state policies.

## V. References

Workforce Innovation and Opportunity Act Policy Letter (WIOAPL) No. 15-22, On the Job Training (OJT) Policy

Workforce Innovation and Opportunity Act Policy Letter (WIOAPL) No. 15-09, Training Services for Adults and Dislocated Worker

Workforce Innovation and Opportunity Act Policy Letter (WIOAPL) No. 15-10, Youth Program Services

Workforce Innovation and Opportunity Act, §§ 134, 188, Public Law 113-128.

NPRM § 680.700; .710; .720; .730; 740; .750 found at 80 Fed. Reg. 20860 (April 16, 2015) (to be codified at 20 C.F.R. § 678.700).

NPRM § 683.275 found at 80 Fed. Reg. 20882 (April 16, 2015) (to be codified at 20 C.F.R. § 683.275).

2 CFR Part 200, Appendix II

State On-the-Job Training Guidance Manual (August 2014). Copies are available online at <http://jfs.ohio.gov/owd/wia/Docs/OJT-Procedures-Manual.pdf>

# Area 14 Workforce Development Board

---

Area 14 Workforce Development Board

Priority of Service for Veterans and Eligible Spouses

Area 14 Policy 15-02

Effective February 4, 2016



---

## **Purpose**

To outline requirements for the 14 Workforce Development Board and partner Ohio Means Jobs centers (Athens, Meigs and Perry counties, hereinafter referred to as “OMJ Center”) implementation of priority of service to veterans and eligible spouses for all DOL funded training programs.

## **Effective:**

Immediately

## **Background**

Recipients of DOL funds for qualified job training programs have been required to provide priority of service since 2002 as outlined in the Jobs for Veterans Act (JVA), Public Law (P.L.) 107-288. The publication of 20 C.F.R. Part 1010, Priority of Service for Covered Persons; Final Rule, which took effect on January 19, 2009 declares that recipients of DOL funds for these job training programs should review and, if necessary, enhance their current policies and procedures to ensure that acceptable protocols are in place. The Workforce Innovation and Opportunity Act (WIOA) Policy Letter No. 15-20 dated December 21, 2015 states, each local area is required to develop a priority of service policy.

## **Definitions**

Definitions can be found in WIOAPL No. 15-20

## **Requirements**

Priority of service means that covered persons are given priority over non-covered persons for the receipt of employment, training, and placement services funded in whole or in part by DOL, including Wagner-Peyser, Trade Adjustment Assistance (TAA), Workforce Innovation and Opportunity Act, Senior Community Service Employment Program, Indian and Native American Programs, Migrant and Seasonal Farmworkers, Workforce Innovation in Regional Economic Development Competitive Grants, and National Emergency Grants.

# Area 14 Workforce Development Board

---

## **Procedures**

Individuals entering Ohio Means Jobs Centers are identified at the point of entry upon completing registration.

Utilizing the Veteran Questionnaire (JFS Form 01863), an individual who is identified as a veteran or covered person will be referred through the designated workflow identified in the attached diagram. During the intake process, designated staff will further explore the covered person's veterans status (e.g., number of days served and discharge status) and assess whether or not the covered person has a significant barrier to employment. If the covered person has at least one of the identified barriers to employment, and meets the definition of eligible veteran or eligible spouse or any other service group identified by the Jobs for Veterans State Grant (JVSG) along with the time and service requirements, they will be referred to the assigned Disabled Veteran Outreach Program Specialist.

The Veteran Questionnaire also gives permission for staff and Ohio Means Jobs Center partners to exchange and disclose necessary information in order for services to be provided by all programs being administered by Ohio Means Jobs centers and/or other partners.

The Ohio Department of Jobs and Family Services Veteran Program Managers, and the local Ohio Means Jobs Center operator shares monitoring responsibilities through regular partner meetings. Monitoring responsibilities include a review of the implementation of internal policies and procedures and how they are in compliance with the priority of service requirements. All Ohio Means Jobs Center staff receive in-service training on the implementation of priority of service for veterans and eligible spouses.

## **Programs with Statutory Priorities**

Priority for WIOA adult-funded individualized career and training services is given to low-income individuals, recipients of public assistance, and individuals who are basic skills deficient. When determining if a veteran or eligible spouse is a "low income individual" for eligibility purposes, amounts paid while on active duty or paid by the Department of Veteran Affairs (VA) for vocational rehabilitation, disability, or related VA-funded programs are not to be considered as income.

A low income veteran or eligible spouse takes precedence, with all other qualifying requirements being equal, over a low income non-covered person in obtaining individualized career services and training services. This does not allow for "bumping" of non-covered persons who had previously been accepted into a program prior to the covered person applying within the same program. However, if there is a waiting list, the veterans or eligible spouses receive access to the service instead of or before the non-covered person on the waiting list.

# Area 14 Workforce Development Board

---

Area 14 Workforce Development Board

Self-Sufficiency and Family Self-Sufficiency

Area 14 Policy 15-03

Effective May 5, 2016



---

## **Purpose**

To set the local level for both “Self-Sufficiency” and “Family Self-Sufficiency” as they relate to requirements of the Workforce Innovation and Opportunities Act.

## **Effective:**

Immediately

## **Self-Sufficiency**

Pursuant to section 134 (b)(3)(A)(i)(I) of the WIOA, for adults and dislocated workers to receive training services, they must be in need of such service to obtain or retain employment that leads to self-sufficiency or wages comparable to or higher than wages from previous employment.

The local definition of “self-sufficiency” should not be confused with the "family self-sufficiency" definition. For working dislocated workers, determination of self-sufficiency status requires a two-step assessment of the worker’s employment:

1. Determine if the employment is “interim employment.”
2. If the employment is not “interim,” determine if the wage is at least the locally defined level of self-sufficiency or if the hourly wage is comparable to or higher than wages from previous employment.

*It should be noted that workers who have received notice of layoff, but have not yet been laid off and who do not have any other sources of employment are not subject to review of self-sufficiency.*

### Interim Employment for Dislocated Workers

Typically, employment is considered to be interim if the salary is below the salary of the dislocated worker’s primary occupation and/or if the dislocated worker is working under the skill level of his or her customary occupation. There may be circumstances where interim employment does provide a sufficient wage temporarily but is not considered permanent employment that leads to self-sufficiency (e.g., working through a temporary agency). The determination about whether or not a dislocated worker’s

# Area 14 Workforce Development Board

---

employment is interim employment must be made on a case by case basis and take into consideration dislocated worker's personal, family, financial, and employment situation. A dislocated worker who is in interim employment is not considered to be self-sufficient even if the hourly wage exceeds locally defined "Self-Sufficiency" level or if the hourly wage is comparable to or higher than the wages from previous employment.

If a dislocated worker has interim employment, this participant is considered to be unemployed at participation and information should be entered into the Ohio Workforce Case Management System (OWCMS) as such.

## Wage Standard for Non-Interim

Employed dislocated workers whose wages are over locally defined self-sufficiency standard or comparable or higher than the wages from previous employment are considered to be "self-sufficient," unless the employment is considered to be "interim employment." Dislocated workers who are determined to be "self-sufficient" may receive career services only.

For "Dislocated Workers" this threshold sets aside the wages earned in previous employment if that employment has ended and is not expected to begin again in the immediate future.

**The Area 14 Workforce Development Board defines "self-sufficiency" as 200% of the Federal Poverty Level for the applicable year, calculated by examining the applicant's family income for the 6-month period prior to the date of application.** For "Dislocated Workers" this threshold sets aside the wages earned in previous employment if that employment has ended and is not expected to begin again in the immediate future.

## Family Self-Sufficiency

As part of the determination of the appropriateness for training services, case managers within the Area 14 workforce development system must review "family self-sufficiency" for participants seeking a WIOA adult funded ITA. WIOA adult funded ITA's may only be approved for those who have been determined to be below a locally defined standard of "family self-sufficiency." This requirement is intended to ensure that adult participants seeking adult funded ITAs are those whose families lack or have limited ability to pay for training and supportive services needed in order to obtain or retain employment.

Additionally, all young adults, ages 18 through 24, who are seeking WIOA adult funded ITAs, must also be screened for dependency status. Refer to WIOAPL No. 1506, Determination of Dependent Status, for guidance on determining dependency status. If an adult, ages 18 through 24, is determined to be dependent, "family self-sufficiency" would include the income(s) of all family members, including the young adult's parent(s).

WIOA eligible adults who are over the local standard for "family self-sufficiency" are not eligible for adult funded ITAs. Other WIOA services may be provided, as appropriate. They may also be served using other WIOA funds, if eligible. WDBs are required to develop the criteria for "family self-sufficiency."

The local definition of "family self-sufficiency" should not be confused with the "self-sufficiency" definition.

**For purposes of determining eligibility for Individualized Training Accounts (ITA's) the Area 14 Workforce Development Board defines "family self-sufficiency" as 200% of the Federal Poverty Level for the applicable year, calculated by examining the applicant's family income for the 6-month period prior to the date of application.**

# Area 14 Workforce Development Board

---

## Area 14 Workforce Development Board

Serving Applicants with a Close Relationship to the Workforce Innovation and Opportunity Act (WIOA) Program

Area 14 Policy 16-04

Effective date: August 4, 2016



---

### **I. Purpose**

The purpose of this policy is to outline requirements and procedures that ensure all individuals receiving services through the Workforce Innovation and Opportunity Act (WIOA) in Area 14 have been determined eligible, assessed, and served in an ethical manner that is free from any real or perceived conflict of interest

### **II. Effective:**

Immediately

### **III. Background**

The WIOA program, while not an entitlement, should be accessible to any individual who is eligible and suitable for services available in Area 14, subject to the policies and procedures of the Area 14 Workforce Development Board. However, when applicants have a close relationship to WIOA staff, management, and other specific stakeholders of the workforce development system, attention must be given to ensure access to program services is not based upon this relationship or political influence. It is possible that even without an intention to misuse WIOA funds, the decision to enroll an individual in the program could be perceived as improper and cause potential non-compliance with state and/or federal law.

All sub recipients of WIOA funds agree, through rule 5101:9-31-01 of the Administrative Code (entitled, 'General requirements for use and expenditures of WIOA funds for local areas'), that they will comply with the standards of conduct for maintaining the integrity of the program and avoid any conflict of interest in its administration including, but not limited to, 29 U.S.C. 2832 (g), chapter 6301 of the Revised Code, and Ohio ethics law.

### **IV. Definitions**

**Bright-line test:** an objective rule that resolves a legal issue in a straightforward, predictable manner

**Close relationship:** the applicant's prior and/or present social interactions and/or business dealings with stakeholders of the workforce development system gives a reasonable observer cause to believe that the applicant's access to WIOA program services would be based upon this relationship, as opposed to demonstrated need.

# Area 14 Workforce Development Board

---

Close family member: parents, step parents, spouse, domestic partner, children, step-children, foster children, siblings, grandchildren, grandparents, and any immediate relatives by blood or marriage (i.e., in-laws, cousins, nieces, nephews, aunts, and uncles).

Stakeholders: individuals not related but have direct or indirect management or responsibility for managing the WIOA workforce system (including WIOA executive staff, supervisors, local elected officials, contractors (e.g., adult, dislocated worker, or youth program providers), WDB and subcommittee members, WIOA employees, and OhioMeansJobs center partner staff.

## V. Policy

When applicants have a close relationship to WIOA staff, management, and other specific stakeholders of the workforce development system, attention must be given to ensure access to program services is not based upon this relationship or political influence. Although this determination may be simple if the applicant is a close family member or friend, it may be more difficult if the applicant has a close relationship with WIOA staff, management, and other stakeholders.

In the absence of a bright-line test to highlight these “close” relationships, WIOA staff, management, and other participants in the Area 14 workforce development system will avoid the appearance of impropriety by abstaining from directly assisting and/or influencing the application process of friends, close family members, former and/or present colleagues, and persons with whom they have an ongoing social or business relationship. Likewise, decisions relating to approving training, supportive services, job referrals, or other service needs must be made by workforce partners with no such relationship to the applicant. Stakeholders identified in this issuance shall not use their position to influence a decision to enroll an individual in the WIOA program.

### **Disclosure and Documentation**

Area 14 program operators shall incorporate into their application/assessment for WIOA services a process for immediate disclosure of a potential conflict between the applicant and any of the following stakeholders of the workforce development system:

- a. Local elected officials;
- b. WDB members, including Executive Director of the board;
- c. WDB sub-committee members
- d. WIOA executive staff and supervisors;
- e. Ohio Means Jobs center staff
- f. Procured WIOA “Career” and “Youth” program operator staff
- g. WIOA sub-recipients and/or contractors; and
- h. County JFS employees (as CCMEP lead agency in each county in Area 14)

All individuals applying for services in the WIOA program are required to indicate whether or not a relationship exists that is covered by this policy. Documentation of the disclosure, including the name of the person and the nature of the relationship, must be maintained in the participant's file. When a relationship exists, it must be disclosed at the time of application to the program.

# Area 14 Workforce Development Board

---

## Process

An "arms-length determination" of eligibility must be conducted by a staff member that has no relationship with the applicant.

When an application is received and a conflict exists with either a local elected official, WDB or Sub-committee member, or WDB Executive Director, the application will be forwarded to another Ohio local workforce development area for eligibility determination, provided Area 14 has entered into an agreement or MOU with another Ohio local workforce development area for this arrangement. If no such arrangement exists, eligibility, appropriateness and service approval will be determined by unanimous agreement from each of the following:

- a. WDB Director (unless subject to the conflict)
- b. Procured WIOA "Career" or "Youth" program operator Directors or designees, as applicable (from counties without relationship to applicant)
- c. WIOA Supervisors (from counties without relationship to applicant)

When an application is received and a conflict exists with either WIOA employees, Ohio Means Jobs center partner staff, WIOA sub-recipients and/or contractors, or county JFS employees, the application will be forwarded to another WIOA Supervisor in Area 14 for determination of eligibility and appropriateness. These requests may be sent to either of the two other counties, but will generally follow this rotation:

Perry County applications sent to Meigs County

Meigs County applications sent to Athens County

Athens County applications sent to Perry County

Determinations of eligibility and appropriateness will be in writing to the originating county, will include determination of eligibility for all possible WIOA programs (in-school, out of school, adult and/or dislocated worker), and may be provided via email.

After eligibility and appropriateness determinations have been made for individuals subject to this policy, subsequent service determinations, including training and supportive services, may be handled in the county of application, provided all determinations are made by staff with an "arms-length" distance from the applicant. However, each funded service must be pre-approved by the eligibility-determining county prior to authorization.

In the event that the conflict arises from an Ohio Means Jobs center partner staff, provider staff, etc. that operate in multiple counties, the Executive Director of the WDB will assign eligibility, appropriateness and service determination to individuals whom, using the best judgement of the Director, can make these determinations without the appearance of a conflict.

## Tracking

All providers within the Area 14 workforce development system must provide a list of all participants who have disclosed that a close relationship to WIOA staff, management, or other specific stakeholders of the workforce development system exists to ODJFS program monitors, auditors and or WDB Director at the onset of all monitoring visits.

# Area 14 Workforce Development Board

---

Area 14 Workforce Development Board

Supportive Services Policy

Area 14 Policy 16-05

Effective August 4, 2016



---

## **I. Purpose**

The purpose of this policy is to establish guidance for Program Operators in delivering supportive services to participants enrolled WIOA funded programs and activities. This policy, and all requirements herein, applies to participants in youth, adult, and/or dislocated worker programs unless specified.

## **II. Effective**

Immediately

## **III. Requirements**

WIOA funded programs are not entitlement programs. Although a participant may be eligible for the WIOA program, Program Operators must weigh all factors before authorizing expenditures for supportive services.

Program Operators will adhere to guidance in the WIOA, as well as state of Ohio guidance in WIOAPL 15-8 and 15-10 in the delivery of supportive services for participants.

Adult and Dislocated Worker supportive service guidance can be found in WIOAPL15-08 (Career Services for Adults and Dislocated Workers).

WIOAPL15-08 states the following: *“Supportive services are services, such as transportation, child care, dependent care, housing, and needs-related payments, that are necessary to enable an individual to participate in career and training services. Referral to supportive services is a career services that may be available to adults and dislocated workers through the workforce development system.*

*Supportive services may only be provided to participants who are in career or trainings services, unable to obtain supportive services through other programs providing supportive services, and that they must be provided in a manner necessary to enable individuals to participate in career and/or training services.”*

Youth supportive service guidance can be found in WIOAPL15-10 (Youth Program Services).

WIOAPL15-10 states the following: *“Supportive services for youth may include, but are not limited to:*

# Area 14 Workforce Development Board

---

- *Linkages to community services;*
- *Assistance with transportation;*
- *Assistance with child care and dependent care;*
- *Assistance with housing;*
- *Needs-related payments;*
- *Assistance with educational testing;*
- *Reasonable accommodations for youth with disabilities;*
- *Referrals to health care; and*
- *Assistance with uniforms or other appropriate work attire and work-related tool costs*

*Supportive services may be provided to youth both during participation and after program exit.”*

## **Funding Caps**

All supportive services utilizing WIOA funding will count towards the participant’s overall funding cap as set by the Area 14 Workforce Development Board (maximum of \$10,000 per year; maximum of \$20,000 total per training program). This cap is inclusive of all employment, educational, training and supportive services utilizing WIOA funding.

## **Other Sources of Funding**

The utilization of WIOA funding for supportive services should be “Last Source”, meaning all other resources or sources of funding have been explored and attempted before the approval of WIOA funding. Documentation is not required for these attempts, but Program Operators should make a good faith effort in utilizing other funding sources before authorizing the use of WIOA funds for supportive services. Program Operators must adhere to any and all relevant internal procurement rules within their organization.

## **Mileage Rates**

Assistance with the costs of transportation may be provided for participants to assist with approved training/educational sites. Travel will be reimbursed at the Program Operator’s discretion up to the standard reimbursement rate set by the Internal Revenue Service (IRS) per mile. Distance may be calculated using an internet travel site (Google Maps, Map Quest, Yahoo, etc.). Mileage will be on a reimbursement basis and will be paid directly to the participant. Travel will be verified by completed attendance sign in sheets. The participant will submit the attendance sheets to the Program Operator. Appropriateness of this service, duration, and reimbursement intervals will all be at the Program Operator’s discretion.

## **Follow-Up Supportive Services**

Providing supportive services to participants that have successfully completed the activities and programs in their plan is allowed, provided that the participant is also participating in providing required information during the follow-up period (employment information, training information, etc.). Participants are not entitled to follow-up supportive services. Each Program Operator must make the determination on whether or not to incorporate these services into an individual’s plan.

# Area 14 Workforce Development Board

---

## **IV. Reporting Requirements**

Program Operators are required to maintain and report accurate program and financial information.

Pursuant to rule 5101:9-30-04 of the Ohio Administrative Code, information regarding WIOA participants and their activities and performance must be entered into Ohio Workforce Case Management System (OWCMS) accurately and timely.

The Area 14 Workforce Development Board will conduct oversight of the implementation of WIOA funded adult and dislocated worker training programs to ensure that participants enrolled in the programs are eligible, that eligibility has been properly documented and services were provided consistent with applicable policies. Program Operators are required to make available to the board and/or contracted monitors all relevant participant files, documents and paperwork.

Through the state's monitoring system, program monitors will review the area's determination of eligibility for adults, dislocated workers and youth, including a participant file review, during the annual onsite monitoring review for compliance with federal and state laws and regulations. Any issues will be handled through the state's monitoring resolution process.

## **V. References**

Workforce Innovation and Opportunity Act, Pub. L. 113-128.

20 CFR Parts 603 et al.

29 U.S.C. 3101 et seq.

Ohio Administrative Code rule 5101:9-30-04, Mandated Use of Ohio Workforce Case Management System (OWCMS).

ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-08, Career Services for Adults and Dislocated Workers, (July 1, 2015).

ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-10, Youth Services, (July 1, 2015).

# Area 14 Workforce Development Board

---

Area 14 Workforce Development Board

Training Services Policy

Area 14 Policy 16-06

Effective August 4, 2016



---

## **I. Purpose**

The purpose of this policy is to establish guidance for Program Operators in delivering training services to participants enrolled in WIOA funded training programs and activities. Training services may be utilized for any of the three funding streams within the WIOA system (Adult, Dislocated Worker and Youth). The requirements set forth in this policy are universal across all streams, unless specifically noted.

## **II. Effective**

Immediately

## **III. Requirements**

WIOA funded programs are not entitlement programs. Although a participant may be eligible for the WIOA program, training services may not be an appropriate utilization of WIOA funding unless the participant has been assessed and a determination has been made by Program Operator staff that the participant is a) likely to benefit from the training service and b) likely to complete the training service and secure employment as a direct result of the training service. Program Operators must weigh all factors before authorizing expenditures for training services. Program Operators will adhere to guidance in the WIOA, as well as state of Ohio guidance in the delivery of training services for participants.

### **Funding Caps**

All training services utilizing WIOA funding will count towards the participant's overall funding cap as set by the Area 14 Workforce Development Board (maximum of \$10,000 per year; maximum of \$20,000 total per training program). This cap is inclusive of all employment, educational, training and supportive services utilizing WIOA funding.

### **Other Sources of Funding**

The utilization of WIOA funding for training services should be "Last Source", meaning all other resources or sources of funding have been explored and attempted before the approval of WIOA funding. Documentation is not required for these attempts, but Program Operators should make a good faith effort in utilizing other funding sources before authorizing the use of WIOA funds for training services. Program Operators must adhere to any and all relevant internal procurement rules within their organization.

# Area 14 Workforce Development Board

---

## **Eligibility for Training Services**

Pursuant to section 134 (b)(3)(A) of the WIOA, training services may be provided to adults or dislocated workers who:

1. After an interview, evaluation, or assessment and career planning, have been determined by OhioMeansJobs staff or OhioMeansJobs center partner staff to be:
  - Unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment through career services;
  - In need of training services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment; and
  - Have the skills and qualifications to successfully participate in the selected program of training services.
2. Selects a program of training services that are directly linked to the employment opportunities in the local area or the planning region, or in another area to which the adults or dislocated workers are willing to commute or relocate; and
3. Are unable to obtain other grant assistance for training or require assistance beyond the assistance made available under other grant assistance programs, including Pell Grant funds.

## Documentation

The case files for participants must contain a determination of need for training service as determined through the interview, evaluation, or assessment, and career planning informed by State and local in-demand occupation lists and training provider performance information, or through any other career service received. It is important that WIOA staff gather enough information, by whatever means, to justify the need for training services.

## Use of Previous Assessments

When determining the services needed for an individual to obtain or retain employment, the Program Operator staff, WIOA staff or an OhioMeansJobs center partner shall not be required to complete a new interview, evaluation, or assessment of a participant if it is determined that it is appropriate to use a recent interview, evaluation, or assessment (within six (6) months) of the participant conducted pursuant to another education or training program. This may include evaluations completed by a secondary school, Vocational Rehabilitation, Adult Basic and Literacy Education (ABLE), Veteran Program, or other education or training providers.

## Priority for Adult Program

Priority for training services funded by and provided through the adult program shall be given to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient for receipt of training services determined appropriate to obtain or retain employment. The emphasis in WIOA is to prioritize services to those individuals who have the most barriers to employment and to provide those individual with the opportunity to benefit from employment and training services.

## Priority for Veterans and Eligible Spouses

Pursuant to the Area 14 Workforce Development Board policy on “Priority of Service”, veterans and eligible spouses take precedence, with all other qualifying eligibility requirements being equal, over non-veteran and eligible spouses in obtaining services and program enrollment.

# Area 14 Workforce Development Board

---

## **Determination of Self-Sufficiency**

Pursuant to section 134 (b)(3)(A)(i)(I) of the WIOA, for adults and dislocated workers to receive training services, they must be in need of such service to obtain or retain employment that leads to self-sufficiency or wages comparable to or higher than wages from previous employment.

For working dislocated workers, determination of self-sufficiency status requires a two-step assessment of the worker's employment:

1. Determine if the employment is "interim employment."
2. If the employment is not "interim," determine if the wage is at least 200% of the Federal Poverty Level (FPL) or if the hourly wage is comparable to or higher than wages from previous employment.

It should be noted that workers who have received notice of layoff, but have not yet been laid off and who do not have any other sources of employment are not subject to review of self-sufficiency.

## Interim Employment for Dislocated Workers

Typically, employment is considered to be interim if the salary is below the salary of the dislocated worker's primary occupation and/or if the dislocated worker is working under the skill level of his or her customary occupation. There may be circumstances where interim employment does provide a sufficient wage temporarily but is not considered permanent employment that leads to self-sufficiency (e.g., working through a temporary agency). The determination about whether or not a dislocated worker's employment is interim employment must be made on a case by case basis and take into consideration dislocated worker's personal, family, financial, and employment situation.

A dislocated worker who is in interim employment is not considered to be self-sufficient even if the hourly wage exceeds the lower living standard income or if the hourly wage is comparable to or higher than the wages from previous employment.

If a dislocated worker has interim employment, this participant is considered to be unemployed at participation and information should be entered into the Ohio Workforce Case Management System (OWCMS) as such.

## Wage Standard for Non-Interim Employment for Dislocated Workers

Employed dislocated workers whose wages are over 200% of the FPL standard or comparable or higher than the wages from previous employment are considered to be "self-sufficient," unless the employment is considered to be "interim employment." Dislocated workers who are determined to be "self-sufficient" may receive career services only.

## **Training Services**

Training Services may include:

- Occupational skills training, including training for nontraditional employment;
- On-the-job training;
- Incumbent worker training;
- Programs that combine workplace training with related instruction, which may include cooperative education programs;
- Training programs operated by the private sector;
- Skill upgrading and retraining;
- Entrepreneurial training;
- Transitional jobs;
- Job readiness training;
- Adult education and literacy activities;
- Customized training.

# Area 14 Workforce Development Board

---

## Linkage to Occupations in Demand

Training services provided shall be directly linked to an in-demand industry sector or occupation or a high potential for sustained growth in the Area 14 or the Southeast Ohio local planning region, or in another area to which a participant receiving such services is willing to relocate. Refer to WIOPL No. 15-11, Use of Individual Training Accounts (ITA), for the guidelines on the selection of State In-Demand Occupations and Local In-Demand Occupations.

## Eligible Training Providers

Training services shall only be provided by providers who have met the criteria to be eligible and have been identified as being on the list of eligible providers of training services pursuant to section 122 of the WIOA. Pursuant to 20 CFR 680.530, providers of OJT, customized training, incumbent worker training, internships, paid or unpaid work experiences, or transitional jobs are not subject to the eligibility requirements outlined in section 122 (a)-(f) of WIOA, but are required to provide performance information established by the State.

## Informed Customer Choice

Training services shall be provided in a manner which maximizes consumer choice in the selection of an eligible provider of such services. Each Ohio Means Jobs center in Area 14 shall make available the list of eligible providers of training services and accompanying performance information. Based upon the available information, participants, with the assistance of staff, are able to make informed customer choices. Refer to WIOPL No. 15-11 for more guidance on informed customer choice.

## Needs-Related Payments

Due to the lack of sufficient funding to properly administer Needs-Related Payments to training participants, Needs-Related Payments will not be offered to participants in the Area 14 workforce development system.

## Individual Training Accounts (ITA)

An ITA is one of the primary methods through which training is financed and provided for adults, dislocated workers and out-of-school youth. ITAs are established on behalf of a WIOA participant to purchase a program of training services from eligible training providers. Guidance on the use of ITA's is offered in WIOAPL No. 15-11 and WIOAPL No. 15-10.

Training contracts may be provided pursuant to a contract in lieu of an ITA if consumer choice requirements and one of the following exceptions are met:

- If such training services are on-the-job training (including placing participants in a registered apprenticeship), customized training, incumbent worker training, or transitional jobs;
- Where the Area 14 Workforce Development Board determines there are an insufficient number of eligible providers of training services in the local area to accomplish the purposes of a system of individual training accounts as described in the local plan;
- If the Area 14 Workforce Development Board determines that there is a training services program of demonstrated effectiveness, through criteria developed by the local board, offered in the local area by a community-based organization or another private organization to serve individuals with barriers to employment;
- If the training is for multiple individuals in in-demand industry sectors or occupations, as long as the contract does not limit the individual's customer choice; or
- The contract is a pay-for-performance contract.

# Area 14 Workforce Development Board

---

## Local Requirements for WIOA Adult, Dislocated Worker and Youth Funded ITAs

For Individual Training Accounts (ITA's) funded through the Adult, Dislocated Worker or Youth Program, participants must:

- meet the minimum requirements of the training provider for the type of training selected. Participants will be required to provide documentation that they meet all requirements before an ITA can be authorized.
- be assessed on their academic skills and knowledge prior to authorization. Individuals must receive a score of 9.0 or better on reading/math grade levels on the CASAS test (Comprehensive Adult Student Assessment System) or received a score of 9.0 or better on the TABE (Test of Adult Basic Education) in order to be enrolled in an ITA training program. If recent (6 months or less) scores are available from a college entrance exam, or other suitable assessment tool, Program Operators may use these as a substitute at their discretion. Suitable accommodations will be provided to participants with disabilities. Individuals that fall short of the required grade level will be referred to the Adult Basic Literacy Education program for remediation. For short-term training that does not require a high-school diploma, Program Operators have the discretion to waive this requirement and use a non-grade level assessment to determine appropriateness for an ITA.
- maintain a 2.0 (minimum) cumulative Grade Point Average or, in training situations where GPA's are not utilized, meet the minimum requirements for the training to satisfactorily progress towards completion. Complying with the attendance requirements of the training provider is an important part of a participant making satisfactory progress. If a participant does not maintain a 2.0 GPA while enrolled in the program, or fails to meet the requirements for satisfactory progression, or fails to comply with the training program's attendance requirements, the Program Operator may exit the participant from the WIOA program and begin non-funded follow-up services. Participants that are exited for this reason will not be eligible for further training services within the Area 14 workforce development system.

## Additional Requirements for Adult-Funded ITAs

WIOA adult-funded ITA's may only be approved for those who have been determined to be below 200% of the FPL as the locally defined standard of "family self-sufficiency." This requirement is intended to ensure that adult participants seeking adult-funded ITAs are those whose families lack or have limited ability to pay for training and supportive services needed in order to obtain or retain employment.

Additionally, all young adults, ages 18-24, who are seeking WIOA adult-funded ITAs, must also be screened for dependency status. Refer to WIOAPL No. 15-06, Determination of Dependent Status, for guidance on determining dependency status. If an adult, ages 18-24, is determined to be dependent, "family self-sufficiency" would include the income(s) of all family members, including the young adult's parent(s).

WIOA eligible adults who are over the local standard for "family self-sufficiency" are not eligible for adult-funded ITAs. Other WIOA services may be provided, as appropriate. They may also be served using other WIOA funds, if eligible.

# Area 14 Workforce Development Board

---

## Extenuating Circumstances for WIOA Adult-Funded ITAs

If a family income exceeds the "family self-sufficiency" standard, a participant may still receive an adult-funded ITA if extenuating circumstances exist. When evaluating extenuating circumstances, the costs related to the economic hardship must be the responsibility of that person or for his or her legal dependent, spouse, or parent. Those costs must be ongoing and expected to cause a financial hardship for the duration of the ITA.

Economic hardships include, but are not limited to:

- The portion of medical procedure or prescription medication costs that are not covered by insurance and are ongoing and determined to be medically essential;
- Health insurance premium payments that are not paid for by private or public sources;
- Payments on past due or back mortgage, rent, or essential services (e.g., electric, water, natural gas, propane, and other utility arrearages) that accumulated because of involuntary unemployment or underemployment;
- Court-ordered child support or spousal payments;
- Ongoing payments to a nursing home, home health care provider, elder care provider, or assisted living provider;
- Payments toward debt that accumulated as a result of a natural disaster, severe illness, or disability.

Extenuating circumstances do not include normal rent, mortgage, utility, automobile, fuel, grocery, credit card, or "pay-day loan," payments.

Exceptions may be approved on a case by case basis for individuals whose family incomes exceeds the family self-sufficiency standard. Documentation explaining the extenuating circumstances must be maintained in the participant file, along with the signature approval of the Area 14 Fiscal Agent and Executive Director of the Area 14 WDB.

## **Determination of Appropriateness for Training Services**

As the WIOA program is designed to provide employment and training opportunities to those who can benefit from, and who are in need of such opportunities, eligible individuals must be determined to be appropriate for training services based upon a consistent and equitable assessment that is relevant to the type of training for which the individuals are applying.

WIOA staff must gather information and assess appropriateness in a timely manner and Program Operators must establish a customer flow that allows an expedited path to needed services.

Training services may be provided to adults, dislocated workers or youth who after an interview, evaluation, or assessment and career planning, have been determined by Ohio Means Jobs staff or Ohio Means Jobs center partner staff to be:

- Unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment through career services;
- In need of training services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment; and
- Have the skills and qualifications to successfully participate in the selected program of training services.

The process to obtain this information shall be a combination standardized tests, interviews, inventory of applicants' fields of interests, skills assessments, career exploration, and available labor market, other data

# Area 14 Workforce Development Board

---

which may have been collected through the provision of a career service, or any other means that provide Program Operator staff the insight into the appropriateness of training services.

## **IV. Reporting Requirements**

Program participation begins when the participant is determined eligible, receives the staff-assisted basic career service, individualized career service, or training service which is funded by the adult or dislocated worker program. For youth participants, program participation begins when the youth is determined eligible and receives an assessment and a program element. Therefore, at the point of participation, a youth participant will be enrolled in the youth program and reported in the Ohio Workforce Case Management System (OWCMS). All youth participants will be counted in the WIOA youth program performance measure calculations. Program Operators are required to maintain and report accurate program and financial information.

Pursuant to rule 5101:9-30-04 of the Ohio Administrative Code, information regarding WIOA participants and their activities and performance must be entered into Ohio Workforce Case Management System (OWCMS) accurately and timely.

The Area 14 Workforce Development Board will conduct oversight of the implementation of WIOA funded training programs to ensure that participants enrolled in the programs are eligible, that eligibility has been properly documented and services were provided consistent with applicable policies. Program Operators are required to make available to the board and/or contracted monitors all relevant participant files, documents and paperwork.

Through the state's monitoring system, program monitors will review the area's determination of eligibility for adults, dislocated workers and youth, including a participant file review, during the annual onsite monitoring review for compliance with federal and state laws and regulations. Any issues will be handled through the state's monitoring resolution process.

## **V. References**

Workforce Innovation and Opportunity Act, Pub. L. 113-128.

20 CFR Parts 603 et al.

29 U.S.C. 3101 et seq.

Ohio Administrative Code rule 5101:9-30-04, Mandated Use of Ohio Workforce Case Management System (OWCMS).

ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-06, Determination of Dependent Status, (July 1, 2015).

ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-14, Needs-Related Payments Using Adult and Dislocated Worker Funds

ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-11, Use of Individual Training Accounts, (July 1, 2015).

ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-08, Career Services for Adults and Dislocated Workers, (July 1, 2015).

ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-10, Youth Services, (July 1, 2015).

# Area 14 Workforce Development Board

---

Area 14 Workforce Development Board

WIOA Youth Eligibility

Area 14 Policy 16-07

Effective August 4, 2016



---

## **I. Purpose**

The purpose of this policy is to set parameters and guide Program Operators in determining eligibility for participants in Workforce Innovation and Opportunity Act (WIOA) funded youth employment and training programs in Area 14.

Although most of the eligibility requirements for WIOA are established by the act itself, as well as the state of Ohio's guidance through WIOAPL 15-03 and 15-07, and 5101:10-3-01 of the Ohio Administrative Code, the Area 14 Workforce Development Board does have discretion relating to several key definitions and components. Program Operators in the Area 14 workforce development system will adhere to all applicable federal and state guidance with regards to WIOA Youth eligibility, as well as the terms set forth in this policy.

## **II. Effective**

Immediately

## **III. Comprehensive Case Management and Employment Program (CCMEP)**

### **Age of Participants**

The Area 14 Workforce Development Board intends to participate in the state of Ohio's Comprehensive Case Management and Employment Program beginning July 1, 2016 by serving 16 to 24 year old are residents with a comprehensive array of services to improve the occupational and educational skills of this population. To align with the programmatic requirements of CCMEP, 14 and 15 year old youth applying for WIOA Youth services will not be enrolled but will still be provided the full array of applicable or appropriate services available through providers and partners of the Ohio Means Jobs system. WIOA Youth who are 14 and 15 years old will be referred to appropriate programs that have the capacity to serve them for assessment, if necessary, and to meet the skills and training needs of this population. Program Operators will provide basic labor exchange services under the Wagner-Peyser Act for this population.

### **County of Residence**

To ensure that eligible youth are able to take full advantage of the Comprehensive Case Management and Employment Program as administered by each county's Lead Agency, all WIOA Youth participants must reside within Area 14 (Athens, Meigs or Perry Counties) to receive WIOA Youth services at a level requiring enrollment. Area 14 WIOA Youth applicants must apply for services in their county of residence. Youth requiring more than self-help services that reside outside of the Area 14 workforce development system will be provided referral information for their local workforce system.

# Area 14 Workforce Development Board

---

## IV. 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 required 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 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 required 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.

# Area 14 Workforce Development Board

---

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 –
- c) The poverty line; or
- d) 70% of the lower living standard income level.
- e) Is a homeless individual;
- f) Receives or is eligible to receive a free or reduced price lunch;
- g) Is a foster child on behalf of whom the State or local government payments are made; or
- h) Is an individual with a disability whose own income meets the eligibility income

# Area 14 Workforce Development Board

---

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.

Postsecondary 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.

School: For the purposes of youth eligibility, school includes secondary and post-secondary schools. It does not include attending classes with Adult Basic and Literacy Education (ABLE), YouthBuild, or JobCorps.

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.

## **V. Eligibility Requirements**

### **In-School Youth Eligibility Requirements**

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

Attending school; and

- a) Not younger than 16 or (unless an individual with a disability who is attending school under state law) older than age 21; and
- b) Is a low-income individual; and
- c) Has one or more of the following barriers:
  - Basic skills deficient;
  - An English language learner;
  - An 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 Area 14 Workforce Development Board. The local area defines this as an individual meeting one or more of the following: 1) Limited English, 2) History of drug or alcohol abuse, 3) Limited or

# Area 14 Workforce Development Board

---

poor work history, 4) Poor oral or written communication skills, 5) Lack of specific up-to-date job skills, 6) Children of Incarcerated parents, 7) Migrant Youth, and/or 8) Youth who require financial assistance and/or support to enter into, stay enrolled or complete an educational or occupational program. Program Operators must document instances when eligibility is determined using this category, and no more than 5% of enrolled In-School Youth can fall into this locally-defined category. Written self-attestation is an acceptable method for documentation of this category.

## **Out-of-School Youth Eligibility Requirements**

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

- a) Not attending any school;
- b) Not younger than 16 or older than age 24; and
- c) 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 complete an education program or to secure or hold employment as defined by the Area 14 Workforce Development Board. The local area defines this as an individual meeting one or more of the following:
    - 1) Limited English, 2) History of drug or alcohol abuse, 3) Limited or poor work history, 4) Poor oral or written communication skills, 5) Lack of specific up-to-date job skills, 6) Children of Incarcerated parents, 7) Migrant Youth, and/or 8) Youth who require financial assistance and/or support to enter into or complete an educational or occupational program. Program Operators must document instances when eligibility is determined using this category. Written self-attestation is an acceptable method for documentation of this category.

## **Basic Skills Deficient**

In assessing basic skills, Program Operators must use assessment instruments that are valid and appropriate for the target population. The Program Operator must also provide reasonable accommodation in the assessment process, if necessary, for people with disabilities.

## **5% Exception of Youth Eligibility:**

Up to 5% of youth participants in Area 14 (both In-School and Out-of-School) may be individuals who would be covered individuals except that the persons are not low-income.

# Area 14 Workforce Development Board

---

## **5% Limitation of In-School Youth Eligibility:**

Not more than 5% of In-School youth participants in Area 14 may be eligible based upon being an individual who requires “additional assistance”, as defined by this policy, to complete an educational program or to secure or hold employment.

## **Selective Service Eligibility:**

Male youth participants who are 18 years of age and older and have fulfilled registration requirements of the Military Selective Service Act (MSSA) are eligible to participate in WIOA-funded programs and services. Workforce Innovation and Opportunity Act Policy Letter No. 15-04, Selective Service Registration, provides guidelines for selective service registration requirements. A male youth applicant, age 18 years old and older, who has not registered for the selective service or who is unwilling to register, will be denied any WIOA program services.

## **VI. Reporting and Monitoring**

Program Operators are required to maintain and report accurate program and financial information. Pursuant to rule 5101:9-30-04 of the Ohio Administrative Code, information regarding WIOA participants and their activities and performance must be entered into Ohio Workforce Case Management System (OWCMS) accurately and timely. OWCMS may be used to assist in the determination of eligibility. However, OWCMS cannot be used as verification of youth eligibility. WIOAPL No. 15-07, Source Documentation for WIOA Eligibility, lists the type of acceptable documentation to verify eligibility for the WIOA adult and dislocated worker programs.

The Area 14 Workforce Development Board will conduct oversight of the implementation of the WIOA youth programs to ensure that participants enrolled in the programs are eligible and that eligibility has been properly documented. Program Operators are required to make available to the board and/or contracted monitors all relevant participant files, documents and paperwork.

Through the state’s monitoring system, program monitors will review the area’s determination of eligibility for youth, including a participant file review, during the annual onsite monitoring review for compliance with federal and state laws and regulations. Any issues will be handled through the state’s monitoring resolution process.

## **VII. References**

ODJFS Workforce Innovation and Opportunity Act Policy Letter No. 15-03

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).

# **MEIGS CCMEP PROCEDURE LETTER #17-03**

## **Transferring and Receiving CCMEP Cases**

### **Comprehensive Case Management and Employment Program**

Temporary Assistance to Needy Families (TANF)

Workforce Innovation and Opportunity Act (WIOA)

December 1, 2017

#### **Transferring a CCMEP case**

When a participant is moving to another Ohio county, the case manager will discuss with the participant of the continuation of CCMEP service from county to county. The case manager and the participant will review the IOP to discuss the development and progression of the identified short term and long term goals to determine if it is in the best interest to transfer the case. OWF recipients shall be transferred to a new county within 10 calendar days of the move.

When a CCMEP program participant moves to another Ohio County and it is in the best interest of the participant to be transferred to the new county, the lead agency must notify the new lead agency of the move within 10 calendar days. OhioMeansJob – Meigs County case manager will contact the potential county's lead agency to discuss case and transfer. The OMJ-Meigs County case manager will determined through the new lead agency how the case documentation is transferred, to identify the new county's case manager, and when the transfer is likely to occur.

The OMJ-Meigs County case manager will completed the following steps in OWCMS before transferring the case:

- For each service entered on the IOP in OWCMS, the OMJ-Meigs County must:
  - a. Select and Actual End Date.
  - b. Select the Service Outcome.
- Enter case note about the transfer in OWCMS
- Select the new lead agency WIOA Office and WIOA staff on the Basic Intake General tab.

OMJ-Meigs case manager will send a follow-up email to the new case manager confirming the case transfer.

#### **Receiving a Transferred CCMEP Case**

The OMJ-Meigs County Supervisor will assign any new transfer CCMEP case to the case manager. Once the transferring case has been transferred, the OMJ case manager will contact the participant to set up an appointment to update their IOP. The IOP must be updated within 10 days of the case transfer. During the appointment, the case manager will discuss any updates that should be made to the IOP and make the appropriate amendments to the IOP with the participant with OWCMS screens and services updated. Case manager will obtain the participant's signature and dates on the updated IOP and file in participant's case file. Case manager will add case note in OWCMS.

# MEIGS CCMEP PROCEDURE LETTER #17-01

## Comprehensive Case Management and Employment Program

Temporary Assistance to Needy Families (TANF)  
Workforce Innovation and Opportunity Act (WIOA)

December 1, 2017

### **Purpose:**

To serve low-income Ohioans ages 14 to 24, through an integrated intervention program that combines the Temporary Assistance for Needy Families (TANF) program and the Workforce Innovation and Opportunity Act (WIOA) Youth program. Designed to assist one of Ohio's most vulnerable populations, this *new way to work* is titled the Comprehensive Case Management and Employment Program (CCMEP). CCMEP provides employment and training services to eligible, low-income individuals based on a comprehensive assessment of employment and training needs, as well as a basic skills assessment toward a career pathway of success.

### **What is Workforce Innovation and Opportunity Act (WIOA)?**

On July 22, 2014, the Workforce Innovation and Opportunity Act (WIOA) was signed into law as Public Law 113-128. WIOA supersedes the Workforce Investment Act of 1998 and amends the Adult Education and Family Literacy Act, the Wagner-Peyser Act, and the Rehabilitation Act of 1973.

The purpose of the law is to:

- Increase opportunities for individuals, particularly those with barriers to employment
- Support alignment of workforce investment, education, and economic development systems
- Provide workers with the skills and credentials to secure and advance employment
- Promote improvement in the structure and delivery of services
- Increase the prosperity of workers and employers
- Increase the employment retention and earnings of participants and the attainment of recognized post-secondary credentials

### **Eligibility for TANF CCMEP:**

Individuals served by TANF and the WIOA Youth programs will be served through CCMEP as a single population under a consolidated system of service delivery.

The following individuals ages 14 to 24 are required to participate in CCMEP:

- Low-income in-school and out of school youth considered to have a barrier to employment and registered for a WIOA program.
- Participants in the Ohio Works First (OWF) program who are work eligible.

In addition, the following individual's ages 16 to 24 may volunteer to participate in CCMEP:

- Participants in the OWF program who are not work eligible.
- Individuals receiving benefits or services through the prevention, retention, and contingency (PRC) program, within 30 days of receiving a benefit.

An individual referred to CCMEP from WIOA shall be determined eligible to receive TANF services funded by TANF when that individual:

- Has (or has applied for) a social security number;
- Is a United States citizen or non-citizen national or qualified alien as those terms are defined in rule 5101:1-2-30 of the Administrative Code;
- Does not owe any of the cost of fraudulent TANF assistance paid to the individual;
- Has been afforded the opportunity to register to vote;

# MEIGS CCMEP PROCEDURE LETTER #17-01

## Comprehensive Case Management and Employment Program

Temporary Assistance to Needy Families (TANF)  
Workforce Innovation and Opportunity Act (WIOA)

December 1, 2017

- Has a gross household income in the previous thirty-day period of less than two hundred per cent of the federal poverty level; and
- Is a minor child or is the parent of a minor child.

### **Referral process for CCMEP TANF:**

The income maintenance unit will send a referral to OMJ –Meigs case manager within 7 days from the date of OWF authorization.

### **Application:**

In order to determine eligibility for CCMEP, the customer must complete JFS 03002 (WIOA Youth Program Eligibility Application). In addition, the JFS 03003 (Comprehensive Case Management and Employment Program (CCMEP) Comprehensive Assessment) and JFS 03004 (Comprehensive Case Management and Employment Program (CCMEP) Individual Opportunity Plan) must be completed. All these documents must be scanned into the individual's file. The participant is considered to be enrolled into CCMEP when the Individual Opportunity Plan (IOP) is signed.

If the youth is a minor, the application, comprehensive assessment, and the IOP must be signed by the parent or guardian.

### **What is the comprehensive assessment?**

The comprehensive assessment is the process for determining the job readiness of program participants; to identify barriers to self-sufficiency; and identify the services necessary to overcome the identified barriers through the comprehensive case management and employment program (CCMEP).

### **How is the comprehensive assessment administered?**

MCDJFS shall schedule the individual referred to CCMEP for a comprehensive assessment on a date that is no later than ten days from the date the individual was referred to CCMEP. The comprehensive assessment shall include:

- 1) The "Comprehensive Case Management and Employment Program (CCMEP) Comprehensive Assessment Tool" JFS 03003, administered by a case manager. The JFS 03003 includes but is not limited to a review of the following:
  - a) Occupational skills;
  - b) Prior work experience;
  - c) Employability;
  - d) Interests;
  - e) Aptitudes;
  - f) Supportive service needs; and
  - g) Developmental needs.
- 2) A basic skills assessment. We are currently using the TABE (Test of Adult Basic Education) for determining basic skills deficiencies. The basic skills assessment will measure skill level as well as skills related gains. Reasonable accommodations will be provided in the assessment process, if necessary, for

# MEIGS CCMEP PROCEDURE LETTER #17-01

## Comprehensive Case Management and Employment Program

Temporary Assistance to Needy Families (TANF)  
Workforce Innovation and Opportunity Act (WIOA)

December 1, 2017

individuals with disabilities as described in paragraph (A)(8) of rule 5101:10-3-01 of the Administrative Code. Assessments that determine an individual's grade level equivalent or educational functioning level may be utilized by are not required.

### **Individual Opportunity Plan (IOP)**

The Comprehensive Assessment will be used to identify necessary services and will be the foundation of the IOP. The IOP will then replace the current self-sufficiency contract (SSC) plan. The IOP will be contract between the individual and the agency to allow the individual to continue to receive cash benefits. Once the CCMEP case manager assigned the participant his/her assignment hours, an email will be communicated to the IM's work activity unit so the assignment can also be loaded on WPAS. The service matrix provided by ODJFS will be used when converting CCMEP services over to WPAS assignments. Participants will be explained by both units that the IOP will need to be followed to prevent sanction of benefits. If the individual does not participate in the IOP activities without good cause, the participant may be sanctions, as if the participant may be sanctioned for not adhering to the self-sufficiency plan.

### **Approval/Denial Notices:**

Each application will need to be approved or denied based on eligibility for the program (MCDJFS, Approval/Denial Form). Case manager will complete the approval or denial notice, mail the original to the household, and copy in CCMEP participant's file.

### **Determination of Funding Source:**

Funding opportunities will be maximized by determining eligibility for both WIOA and TANF through the use the JFS 03002 application. This will allow for streamlined eligibility and increased access to supportive services. The advantage of co-enrolling will be to have multiple funding sources or the best funding source available. By co-enrolling, if a participant is not eligible for one program, they may be eligible for another. This determination will be done at the time by the CCMEP case manager.

Reminder, that TANF eligibility needs to be re-determined every six months. Eligibility for WIOA will be conducted by staff at OMJ-Meigs whereas, eligibility for TANF CCMEP will be conducted by income maintenance unit.

### **What services are available?**

The program offers a range of services to help individuals achieve goals related to obtaining employment, increased earnings and/or obtainment of a certificate or credential. These include:

- Tutoring or study skills training;
  - Tutoring, study skills training, instruction and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential
- Alternative secondary school services, or dropout recovery services;
  - Alternative secondary school services or dropout recovery services. This includes alternative secondary school services such as basic education skills training, individualized academic

# MEIGS CCMEP PROCEDURE LETTER #17-01

## Comprehensive Case Management and Employment Program

Temporary Assistance to Needy Families (TANF)  
Workforce Innovation and Opportunity Act (WIOA)

December 1, 2017

- instruction, and English as a second language training. These services assist the program participant who has struggled in traditional secondary education. Dropout recovery services include credit recovery, counseling, and educational plan development. Dropout recovery services assist program participants who have dropped out of school.
- Paid and unpaid work experiences (including summer employment opportunities, pre-apprenticeship programs, internships and job shadowing, and on-the-job training opportunities);
    - Planned, structured learning through paid or 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 designed to prepare individuals to enter and succeed in an apprenticeship program registered under the National Apprenticeship Act (1932);
      - (c) Internships and job shadowing;
      - (d) On-the-job training opportunities;
  - Occupational skills training;
    - Occupational skill training, which includes priority consideration for training programs that lead to recognized post-secondary credentials that align with in-demand industry sectors or occupations in the state or in the local area involved, if the local board determines that the programs meet the quality criteria described in WIOA sections 122 and 123.
      - (a) Individual training accounts (ITAs) may be established for program participants that are out-of school youth. ITAs are established on behalf of the participant to purchase a program of training services from eligible training providers listed on the workforce inventory of education and training (WIET).
  - Education offered concurrently with workforce preparation activities;
    - Education offered concurrently with workforce preparation activities and training for a specific occupation. This includes programs that provide workforce preparation activities, basic academic skills, and hands-on occupational skills training being taught within the same time frame and connected to training in a specific occupation, occupational cluster, or career pathway.
  - Leadership development opportunities;
    - Leadership development opportunities, including community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors.
  - Adult mentoring;
    - Adult mentoring for a duration of at least twelve months that may occur both during and after participation in CCMEP.
  - Entrepreneurial skills training;
  - Financial literacy education;

# MEIGS CCMEP PROCEDURE LETTER #17-01

## Comprehensive Case Management and Employment Program

Temporary Assistance to Needy Families (TANF)  
Workforce Innovation and Opportunity Act (WIOA)

December 1, 2017

- Financial literacy education. This includes a program activity provided to gain an understanding of basic financial information which is necessary to become self-sufficient, and includes but is not limited to the following:
  - (a) Supporting the ability of CCMEP participants to create household budgets, initiate saving plans, and make informed financial decisions about education, retirement, home ownership, wealth building, or other savings goals;
  - (b) Supporting the ability to manage spending, credit, and debt, including credit card debt, effectively;
  - (c) Increasing awareness of the availability and significance of credit reports and credit scores in obtaining credit, including determining their accuracy;
  - (d) Supporting the ability to understand, evaluate, and compare financial products, services, and opportunities; and
  - (e) Supporting activities that address the particular financial literacy needs of non-English speakers.
- Comprehensive guidance and counseling;
  - Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling, as well as referrals to counseling, as appropriate to the needs of the individual youth
- Labor market and employment information;
  - Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services; and
- Activities to prepare youth to transition to post-secondary education and training;
- Supportive services including access to drug and alcohol abuse counseling, health care, transportation, child care, housing, uniforms and work-related tools, educational testing and reasonable accommodations for youth with disabilities; and
- Follow-up.
  - Follow-up services for not less than twelve months after the completion of participation in CCMEP as described in paragraph (D) of rule 5101:14-1-06 of the Administrative Code. Follow-up services may vary dependent on each program participant's needs and the IOP in effect upon exit, and are intended to provide the necessary support to ensure the program participant's post-program success, including but not limited to:
    - (a) Supportive services;
    - (b) Regular contact with program participants and their employers, including assistance addressing work-related problems;
    - (c) Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services.
    - (d) Financial literacy education;
    - (e) Adult mentoring; and

# MEIGS CCMEP PROCEDURE LETTER #17-01

## Comprehensive Case Management and Employment Program

Temporary Assistance to Needy Families (TANF)

Workforce Innovation and Opportunity Act (WIOA)

December 1, 2017

- (f) Activities that help the program participant prepare for and transition to post-secondary education.

### Keys to Success:

CCMEP's success is based on the customer's active participation in the program, as well as regular, meaningful engagement by case managers. Individuals participating in CCMEP are required to commit to participating in activities outlined in their individual opportunity plan for a minimum of 20 hours per week.

### Intensive Case Management:

The CCMEP case manager will engage participants every 14 days if the participant is deemed eligible for intensive services. The CCMEP case manager will engage the participant every 30 days if the participant is not receiving intensive services. Intensive services are defined as participants who are: participating in a parenting class as part of the PCSA case plan, participating in alcohol and drug addiction treatment, homeless, victims of domestic violence, ex-offenders, receiving mental health counseling, receiving dropout and recovery services, receiving assistance transitioning from foster care, and other services as defined by the lead agency.

### Limits per participant per year:

#### **\$10,000 Total expenses paid per participant per year**

Meigs County has established an overall maximum cap of \$10,000 per participant per year for participants in CCMEP/WIOA programs, to complete any of the 14 WIOA elements. These services may also include housing, rent/deposit, work related items, automobile repair, training, incentive, and supportive services. Any number of individual payments can be made during this period. The year begins on the date of eligibility. If the \$10,000.00 is exhausted before the first year, no other funds may be authorized until the enrollment year has been completed. An additional \$10,000.00 will be available at the beginning of the next program year.

#### **\$10,000 Total expenses paid per participant per year**

##### **All-inclusive with caps on the following:**

**\$5,000 Individual Training Account (ITA)**

**\$8,000 On-the-Job Training (OJT)**

**\$6,000 – Summer Employment Opportunity**

**\$3,000 Supportive Services**

**\$3,000 Incentives**

### Individual Training Account (ITA):

The ITA policy will follow the Area 14 Workforce Development Board policy on ITA's located at <http://www.ohioarea14.org/>. Furthermore, Meigs County will limit the funding for ITA's to \$5,000 per year per participant.

# MEIGS CCMEP PROCEDURE LETTER #17-01

## Comprehensive Case Management and Employment Program

Temporary Assistance to Needy Families (TANF)  
Workforce Innovation and Opportunity Act (WIOA)

December 1, 2017

The link below provides access to in-demand occupation data:

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

Individuals attending post-secondary training will be required to apply for federal and state financial aid. ITA's may be issued to supplement financial aid that the individual is approved for to finance their training activity. If the participant is not eligible for financial aid, an ITA may be used to finance the training within the limits of policy.

Costs covered through the use of an ITA may include, but are not limited to:

- Tuition;
- General Service Fees;
- Application Fees;
- Lab Fees;
- Testing Fees;
- Books;
- Uniforms;
- Other fees associated with the training and approved by WIOA staff, such as physicals/shots, eye glasses/contacts, etc.

The duration of an ITA is determined by a participant's course of study. Realistic and attainable training plans must be considered. 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. Long-term training is training whose length does not exceed 24 months. Four-year degree programs may be funded when the customer 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).

There may be instances where a participant is unable to complete the training program within the time frame outlined in the ITA. These circumstances include, but are not limited to:

- Military service or leave time;
- Lack of availability of classes;
- Cancellations of classes;
- Unforeseen illness (of the participant or an immediate family member of the participant).

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

### **Paid Work Experience:**

Work experience is one of the fourteen (14) required program elements that must be made available to all registered youth and will be provided throughout the program year. Paid work experience is designed as a planned, structured learning activity that takes place in workplace setting for a limited period of time and has an academic and occupational education component. Work experience may be paid or unpaid. Work experience may be conducted in the private-for-profit, private non-profit, and public sectors.

# MEIGS CCMEP PROCEDURE LETTER #17-01

## Comprehensive Case Management and Employment Program

Temporary Assistance to Needy Families (TANF)  
Workforce Innovation and Opportunity Act (WIOA)

December 1, 2017

### On-the-Job Training (OJT)

The OJT policy will follow the Area 14 Workforce Development Board policy on OJT's located at <http://www.ohioarea14.org/>. In order to complete the OJT with the participant, an individualized contract will need to be completed. Furthermore, Meigs County will limit the funding for OJT's as stated in the limits per participant per year section of this policy.

### Summer Employment Opportunity

This program will allow Meigs County DJFS to establish programs that enable CCMEP youth to gain valuable work experience while earning a paycheck to help meet basic needs. Summer employment programs offer the opportunity for youth to develop a work history and have a current reference from an employer. Employment opportunities will come from either public or private sector employers and cover a multitude of work experiences that include, but not limited to office work, ground maintenance and other typical summer employment opportunities. Employers will be reimbursed wages at 100%, plus applicable fringes and required work related items, up to \$10.00 per hours for a maximum period of 12 weeks.

### **Unpaid Work Experience:**

Unpaid work experience is an activity exposing participants to the working environment, and an individual does not expect payment for tasks performed. For unpaid work experience, WIOA funds may be used for incentives and/or a stipend for youth. Incentives and stipends encouraging successful completion are beneficial to youth.

### 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. Job shadowing is limited and allows youth to observe only.

### **Supportive Services:**

The supportive services policy will follow the Area 14 Workforce Development Board policy on supportive services located at <http://www.ohioarea14.org/> and Meigs County CCMEP Procedural letter 17-03. MCDJFS views supportive services to address emergent needs that jeopardizes employment or the change of employment. Appropriateness of supportive service and the duration of the services will be at the case manager's discretion. Case manager must make the determination on whether or not to incorporate these services into a participant's IOP. Supportive services will be limited to four consecutive months per instance of service for those TANF funded participants who are not employed and not in receipt of OWF. Furthermore, Meigs County will limit the funding for supportive services as stated in the limits per participant per year section of this policy.

### Incentives:

Each CCMEP participant may be eligible for incentives based on the following:

- \$100 for increasing two grade levels in reading and/or math (TABE testing) for those individuals who are basic skill deficient (at or below 8.9 grade level)
- \$500 graduation bonus from GED, high school or a post-secondary two-year program

# MEIGS CCMEP PROCEDURE LETTER #17-01

## Comprehensive Case Management and Employment Program

Temporary Assistance to Needy Families (TANF)

Workforce Innovation and Opportunity Act (WIOA)

December 1, 2017

- \$250 for graduating from an approved training provider and obtaining a certificate or licensure
- \$125 for obtaining an occupational credential/license/certificate
- \$500 for obtaining new unsubsidized employment (not self-employment) of 20+ hours a week; \$500 for job retention after six months of 20+ hours; and \$500 at completion of one year of 20+ hours.
- \$ for In-school progress reports

Subject Grades on report card for each grading period (per school district grading scale)	A= 20 points B =15 points C=10 points
GPA at the end of the school year	4.0-3.5 = 20 points 3.4-3.0 = 15 points 2.9-2.5 = 10 points 2.4-2.0 = 5 points
Rewards ( <i>calculated from the total subjects grade and GPA category</i> )	5 to 50 points = \$25.00 51 to 100 points = \$50.00 101 to 150 points = \$75.00 151 and above = \$100.00
Attendance each grading period	3 days or less = \$25.00
<b>**THERE WILL BE NO REWARDS IF THERE IS AN F OR INCOMPLETE ON THE PROGRESS REPORT**</b>	

### Monitoring program participation:

Case managers shall document and verify CCMEP activity hours in unpaid and paid activities for program participants. The statewide database generated turn-around documents will be utilized when available for CCMEP participants. When those are not available, the attached time sheet is the preferred method.

### When do participants complete the program?

A participant may be considered to have completed the program when they have obtained employment, successfully entered post-secondary education, enlisted in the military, or been awarded social security disability insurance and applied for services with Opportunities for Ohioans with Disabilities. A participant may be required to leave the program if they repeatedly fail to meet commitments outlined in their individual opportunity plan.

Case managers need to work in collaboration with their supervisor on strategic exiting from the program.

### What is the process for exiting someone from CCMEP?

MCDJFS shall:

1. Ensure that the program participant does not require any additional services or that MCDJFS has made reasonable efforts to provide the program participant with CCMEP services and the program participant has failed to utilize them on multiple occasions.

# MEIGS CCMEP PROCEDURE LETTER #17-01

## Comprehensive Case Management and Employment Program

Temporary Assistance to Needy Families (TANF)  
Workforce Innovation and Opportunity Act (WIOA)

December 1, 2017

2. No later than thirty days from ending all services, issue a notice of adverse action to the program participant in accordance with rule 5101:6-2-04 of the Administrative Code. The notice shall clearly indicate that eligibility for CCMEP will end in ninety days.
3. Continue to attempt to engage the program participant in accordance with paragraph (C)(7) of rule 5101:14-1-03 of the Administrative Code during the ninety-day period. When a program participant reengages in CCMEP within ninety days of the adverse action notice, the lead agency shall reevaluate the service strategy appropriate for the program participant and determine what additional services (if any) are needed.
  - a. When additional services are needed, the program participant shall remain eligible for CCMEP;
  - b. When services are not provided for ninety consecutive days and future services have not been scheduled, the program participant is no longer eligible for CCMEP and shall be exited from CCMEP. The lead agency shall provide follow-up services in accordance with paragraph (D) of this rule. Follow-up service is not considered a future service.

What if a program participant is not eligible for temporary assistance for needy families (TANF) and Workforce Innovation and Opportunity Act (WIOA) (2014) funding?

1. When in accordance with paragraph (B) of rule 5101:14-1-04 of the Administrative Code, a program participant is not eligible for TANF and is not eligible for WIOA, the lead agency shall:
  - a. Immediately end all CCMEP services;
  - b. Issue a notice of adverse action to the program participant in accordance with rule 5101:6-2-04 of the Administrative Code. The notice shall clearly indicate that eligibility for CCMEP will end in fifteen days.
2. A program participant whose eligibility is proposed for termination in accordance with this rule shall not:
  - a. Participate in CCMEP without meeting the criteria described in paragraph (B) of rule 5101:14-1-02 of the Administrative Code.
  - b. Receive follow-up services in accordance with this rule; or
  - c. Be included in a performance measure described in rule 5101:14-1-07 of the Administrative Code.

### Follow-Up Services

In order to support their success and stability, participants exiting the program will receive follow-up services for a minimum of 12 months. Follow-up services may include, but is not limited to, leadership development, assistance addressing work-related problems, mentoring, or work-related peer support groups. The WIOA Youth case manager will be responsible for all CCMEP follow-up related to both TANF and WIOA participants. Services under TANF follow-up will require that redetermination of TANF eligibility every six months.

# **MEIGS CCMEP PROCEDURE LETTER #17-01**

## **Comprehensive Case Management and Employment Program**

Temporary Assistance to Needy Families (TANF)  
Workforce Innovation and Opportunity Act (WIOA)

December 1, 2017

### **Database management:**

All CCMEP participants are required to be entered into the OWCMS program and noted as a CCMEP participant. OWF participants are also required to be entered in WPAS screens in CRISE. CCMEP case manager will also ensure that all program participants are registered with the OhioMeansJobs website ([www.ohiomeansjobs.com](http://www.ohiomeansjobs.com))

### **Cases transferring to another county:**

When a CCMEP participant moves to another county, Meigs County CCMEP case activities needs closed and transferred to the transferring county in OWCMS and/or CRISE. Referred to Meigs CCMEP Procedural Letter 17-04.

# **MEIGS CCMEP PROCEDURE LETTER #17-04**

## **Supportive Services**

### **Comprehensive Case Management and Employment Program**

Temporary Assistance to Needy Families (TANF)

Workforce Innovation and Opportunity Act (WIOA)

December 1, 2017

#### **Purpose**

To establish a standardized supportive service policy for CCMEP participants in removing barriers to obtain/retain employment or to participate in workforce programs/training, identified in their Individual Opportunity Plan (IOP) that will lead to employment.

Supportive Services are intended to enable an individual to participate in the CCMEP and may include, but not limited to linkage, referral or assistance with: Access to community service, transportation, child care, housing, uniforms, work attire, and work-related tools, educational testing, and reasonable accommodations for youth with disabilities.

#### **Procedure**

A cap of \$3,000 per year has been established for supportive services for CCMEP participants. The year begins on the date of WIA eligibility. Any number of individual payments can be made during this period. The OMJ – Meigs County case managers are responsible for using objective criteria when determining eligibility and approving or denying the supportive service request. Verification of information will be required to process request.

The supportive services policy will follow the Area 14 Workforce Development Board policy on supportive services located at <http://www.ohioarea14.org/>. The agency views supportive services to address emergent needs that jeopardizes employment or education goals or the change of employment. Supportive services may include, but not limited to: access to drug and alcohol abuse counseling, health care, transportation, child care, housing, uniforms and work-related tools, educational testing and reasonable accommodations for youth with disabilities. Appropriateness of supportive service and the duration of the services will be at the case manager's discretion. Case manager must make the determination on whether to incorporate these services into a participant's IOP. Supportive services will be limited to four consecutive months per instance of service for those TANF funded participants who are not employed and not in receipt of OWF.

OMJ – Meigs County will structure TANF funded supportive services to CCMEP participants to ensure that the supportive services do not provide TANF “assistance”.

Participant case notes must document the form of supportive services provided and the date of issuance. The program case manager must maintain accurate documentation of all supportive services provided to participants.

# MEIGS CCMEP PROCEDURE LETTER #17-04

## Supportive Services

### Comprehensive Case Management and Employment Program

Temporary Assistance to Needy Families (TANF)

Workforce Innovation and Opportunity Act (WIOA)

December 1, 2017

Supportive Services allowable under the \$3,000 cap are as follows

- **Mileage Assistance.**

\$5.00 per day for travel less than 50 miles from residence and \$10.00 per day for travel in equal t or more than 50 miles from residence. Mileage will be on a reimbursement basis and will be paid directly to the participant. This will be verified by completed month time sheets. The participant will turn the time sheets in by the 10<sup>th</sup> day of the following month, which will be included in the participant's file.

- **Transportation Expenses.**

- Car repairs: transportation expenses is will be used for the prevention and retention purposes to assist participants of CCMEP in either gaining or retaining employment and/or training.

The participant must provide two (2) identical written estimates of the needed repair from a legitimate repair source in Meigs County (provider must have valid vendor license). An estimate by the applicant or a relative is not acceptable.

Required documentation that is retained in participant's file:

1. *Vehicle Registration: The vehicle to be repaired must be titled in the participant's name*
2. *Current drivers license.*
3. *Verification must be provided that the vehicle is covered under a current insurance plan.*

*\*\*In emergency situations, CCMEP case manager may waive the 2 estimates\*\**

- Transportation services may also include license plate fees, first time driver's training course fees, and CDL permit fees in order to gain and retain employment.

- **Job Related Expenses**

Supportive services may be used for job-related purposes such as tools, uniforms, safety equipment, shoes, and interview clothing that are mandatory by the educational institution.

An estimate of costs must be provided and approved before the purchase or order of any needed materials is authorized.

- **Educational Services**

Supportive services can be used for testing and graduation fees needed for licensure and/or credentialing. Verification needs to be provided prior to authorization.

# **MEIGS CCMEP PROCEDURE LETTER #17-04**

## **Supportive Services**

### **Comprehensive Case Management and Employment Program**

Temporary Assistance to Needy Families (TANF)

Workforce Innovation and Opportunity Act (WIOA)

December 1, 2017

OMJ-Meigs County has the right to authorize additional services that directly related to the participant's career pathway and IOP.

Incentives is available to youth upon completion of activities tied to goals identified in the CCMEP participant's IOP. Incentives may be provided to the youths who successfully benchmark achieved activities, as outlined in Meigs County CCMEP Procedural Letter 17-01. A cap of \$3,000 per year has been established for incentives for CCMEP participants.

As long as the payment is authorized within the appropriate period, actual payments will be made to vendors. All CCMEP payments are made by MCDJFS to the vendor.

If the \$3,000 is exhausted before the first year, no supportive services can be provided until the enrollment year has been completed. The additional \$3,000 will be available beginning of second year.

# **MEIGS CCMEP PROCEDURE LETTER #17-02**

## **Follow-up Services**

### **Comprehensive Case Management and Employment Program Adult/Dislocated Worker WIOA Program**

Temporary Assistance to Needy Families (TANF)  
Workforce Innovation and Opportunity Act (WIOA)

December 1, 2017

#### **Purpose**

WIOA requires that no less than 12 months of follow-up services be offered to all youth. Follow-up will be seen as an extension of the program during which staff help participants create their own solutions to the challenges they continue to face as they transition to employment, the military or post-secondary education. The intensity of follow-up contacts varies based on the needs of each individual and appropriate services to help in facing challenges that come up on the job, in college, or in occupational skill training will be provided.

The goal of follow up services is to enable participants to continue lifelong learning and achieve a level of self-sufficiency to ensure job retention, wage gains, and career progress. Follow-up services should help each participant complete training and/or maintain employment and should provide a continuous link to the workforce system including referral networks and partner programs.

#### **Follow Up Services**

As with services provided before the CWDS exit, follow-up services must be based on each youth's needs. Youth must be made aware that follow-up is part of the commitment they make in joining the program; the message will be positive in tone and show the individual the benefit of follow-up.

Follow-up services are critical services provided following a youth's exit from the program to help ensure the youth is successful in employment and/or post-secondary education and training.

Follow-up services may include:

- Leadership development and supportive service activities;
- Regular contact with a youth participant's employer, including assistance in addressing work-related problems that arise;
- Assistance in securing better paying jobs, career pathway development, and further education or training;
- Work-related peer support groups;
- Adult mentoring; and/or
- Services necessary to ensure the success of youth participants in employment and/or post-secondary education

# **MEIGS CCMEP PROCEDURE LETTER #17-02**

## **Follow-up Services**

### **Comprehensive Case Management and Employment Program Adult/Dislocated Worker WIOA Program**

Temporary Assistance to Needy Families (TANF)  
Workforce Innovation and Opportunity Act (WIOA)

December 1, 2017

All youth participants must receive some form of follow-up services for a minimum duration of 12 months. The types of services provided and the duration of services must be determined based on the needs of the youth and therefore, the type and intensity of follow-up services may differ for each participant.

#### **Process**

At a minimum, quarterly contact will be attempted during the 12-month follow up services. Follow up service may start immediately after the participant is exited from the program. The exit and quarterly updates must be entered in OWCMS. All follow up information shall be reflected on the Follow up Form, located in participants file.

Follow-up services may include regular contact with the participant's employer, including assistance in addressing work-related problems, assistance in securing better paying jobs, career pathway development and/or adult mentoring.

#### **Supportive Services**

Prior to exit, a \$500.00 incentive was issued to an employed participant, for obtaining new unsubsidized employment of minimum of 20 hours per week/86 hours per month. During the follow-up months, the participants also may be eligible for receive incentive for job retention. After 6 months and 12 months of retention a participant will be eligible to receive \$500.00 incentives.

Case manager will follow supportive service policy, as it pertains to the mileage, transportation, job related expenses, educational needs, and additional services. Participants must be cooperating with the case manager during follow up to be eligible for follow up supportive services.

Case managers will ensure that the funding does not exceed cap, as set forth in Meigs County CCMEP Procedural Letter 17-01