

Policy Number: 2023-1-11.0-CCMEPMP

Effective Date: This policy will go into effect immediately upon passage.

Purpose

This policy provides guidance regarding local oversight responsibilities for the administration of federal and state funding, including Workforce Innovation and Opportunity Act (WIOA) Youth and Temporary Assistance for Needy Families (TANF) funds used in Comprehensive Case Management and Employment Program (CCMEP). Oversight includes reviewing, monitoring, evaluation and technical assistance of WIOA and TANF funded services delivered. The Lucas County Workforce Development Board Area 9 (LCWDB) and the Lucas County Department of Planning and Development (LCDPD) will collaborate to monitor each recipient and sub-recipient for delivery of programs, customer's physical file and the State case management system, Advancement, Resources, Information and Employment Services (ARIES). Audits provide reasonable assurance of compliance with state and local LCWDB policies, LCDPD internal procedures, state performance regulations, and award provisions applicable to CCMEP programs.

Background

The CCMEP program is monitored annually or as frequently as requested by state monitoring staff. LCDPD will conduct quarterly reviews or as frequently as requested based upon need. LCDPD is responsible for monitoring its sub-recipients, contractors and staff to ensure that all activities are in compliance with state and LCWDB policies, LCDPD internal procedures, state performance regulations, and award provisions applicable to CCMEP. As part of this monitoring, LCDPD, will also review performance measures to ensure improvements in process are met, priorities and strategies are implemented to improve youth outcomes and performance results. This local monitoring process will assist in ensuring the local workforce area and service providers are on track with meeting state and local performance requirements. The purpose of internal reviews is to prevent observations and findings of noncompliance from the state monitoring staff which would require a Continuous Improvement Plan (CIP) or a Corrective Action Plan (CAP) for failing performance measures in CCMEP.

Policy Reference:

Ohio Department of Job and Family Services (ODJFS) will formally monitor all recipients receiving state or federal funding dollars in accordance with grant requirements on an annual basis for the duration of any agreements as required by WIOA Section 183 and OMB 2 CFR Part 200.

LCDPD will formally monitor all sub-recipients staff receiving state or federal funding dollars in accordance with grant requirements on a quarterly or on an as needed basis for the duration of any agreement.

- 1) LCDPD has established appropriate systems for procurement, awarding and monitoring of contracts with sub-recipients. The system establishes clear standards of accountability;
- 2) LCDPD developed a contract with an agreed Scope of Work with goals, obligations, and

- performance measurements in unambiguous terms;
- 3) The sub-recipient staff implementing CCMEP must regularly attend trainings offered by ODJFS on CCMEP and the ARIES system used for workforce case management.
 - 4) LCDPD will take prompt and appropriate corrective action upon discovery of any evidence of violation of any federal, state provision and/or local CCMEP policies and sub-recipient agreement.
 - 5) LCDPD reserves the right to end the contract with the sub-recipient/contractor for nonperformance, noncompliance, or failure to comply with corrective action. In addition, Workforce Area 9 and/or lead agency may require repayment of funds that are spent in a manner that does not meet program performance, local policy, state/federal regulation, or law.
 - 6) If corrective action or fund repayment by the sub-recipient/contractor is required, such action will result in a loss of points in the competitive scoring for the next procurement for which the sub-recipient/contractor applies.

Definitions

Workforce Innovation Opportunity Act (WIOA): The programs under the Workforce Innovation and Opportunity Act (WIOA) that involve workforce investment systems. Title I of WIOA includes: statewide and local workforce investment systems, State and Local Workforce Policy Boards, One-Stop Systems, Eligible Training Providers for adults, dislocated workers and youth, Youth activities, Adult and Dislocated Worker Employment and Training Activities, Performance Accountability System, Job Corps, and National WIOA programs administered by the US Department of Labor.

Temporary Assistance for Needy Families (TANF): Temporary Assistance to Needy Families is a federal program providing cash, medical, or food assistance for parents and children.

Sub-recipient: A non-federal entity that receives a sub-award for the purpose of carrying out part of a federal award. The sub-award creates a federal assistance relationship with the sub-recipient.

Performance Measures: Standards set by the Ohio Department of Jobs and Family Services (ODJFS) to determine the effectiveness of achieving program goals and objectives.

Observation: Means that the sub-recipient/contractor has not implemented a best practice that could lead to violations of policy, regulation, or law, and the sub-recipient/contractor should take the appropriate actions to implement the steps outlined in the monitoring report.

Finding: Means that the sub-recipient/contractor is required to take a specified corrective action and provide the workforce area and/or lead agency with written evidence that the corrective action has been implemented.

Continuous Improvement Plan (CIP): A plan that outlines corrective action within a local workforce investment area to ensure full compliance with federal and state law and WIOA regulations. This plan must be submitted by a local area when auditing or monitoring reveals compliance issues.

Corrective Action Plans (CAP): Observations and Findings may result in a Corrective Action Plan for the sub-recipient. CAPs are used to ensure that significant weaknesses discovered during the monitoring process are addressed timely by the sub-recipient to prevent any ongoing issues.

References

[CCMEP Rules WIOA Youth Rule](#)

[WIOA Youth Policy Letters](#)

[WIOAPL No. 15-03.1](#) WIOA Youth Program Eligibility

[WIOAPL No. 15-04](#) Selective Service Registration

[WIOAPL No. 15-05](#) Serving Applicants with a Close Relationship to the Workforce Innovation and Opportunity Act Program

[WIOAPL No. 15-06](#) Determination of Dependent Status

[WIOAPL No. 15-07.3](#) Source Documentation for WIOA Title I Program Eligibility [Attachment A](#) and [Attachment B](#)

[WIOAPL No. 15-10](#) Youth Program Services

[WIOAPL No. 15-11.3](#) Use of Individual Training Accounts

[WIOAPL No. 15-13](#) Work Experience for Youth

[WIOAPL No. 15-19.1](#) Poverty Line and Lower Living Standard Income Level

[WIOAPL No. 15-20.2](#) Priority of Service for Veterans and Eligible Spouses

[WIOAPL No. 15-22.1](#) On-the-Job Training (OJT) Policy

[WIOAPL No. 15-26](#) ITA Financial Definitions

[WIOAPL No. 16-02.2](#) Eligible Training Providers

[WIOAPL No. 17-02](#) WIOA Adult, Dislocated Worker, and Youth Programs Performance Accountability

[WIOAPL No. 17-03](#) Procurement of the Comprehensive Case Management and Employment Program Provider for WIOA Youth-Funded Activities and Services

[WIOAPL No. 17-04.3](#) Waivers for Implementation of the Comprehensive Case Management and Employment Program

[CCMEP Procedure Letters](#)

[Cash Assistance Rules](#) related to CCMEP

[5101:1-2-01](#) The Application Process for Ohio Works First and Refugee Cash Assistance

[5101:1-1-01](#) Temporary Assistance for Needy Families Definitions

[5101:1-3-11](#) Ohio Works First: Appraisals, Assessments, and Self Sufficiency Contract

[5101:1-3-12](#) Ohio Works First: Work Activities

[5101:1-3-13](#) Ohio Works First: Good Cause for Work Activity Failures

[5101:1-24-20](#) Prevention, Retention and Contingency Program: Excluded Income and Resource LCDPD Fiscal Monitoring Policy