



February 18, 2022

February 22, 2022

**CCMEPPL 9 (Verbal and Electronic Signatures)**

**Comprehensive Case Management and Employment Program Procedure Letter #9**

**To:** Directors, County Department of Job and Family Services  
Directors, Local Workforce Development Boards

**From:** Matt Damschroder, Director, Ohio Department of Job and Family Services

**Subject:** Verbal and Electronic Signatures

**Background**

Ohio approved verbal signatures and an extension of certification periods for the Comprehensive Case Management Employment Program (CCMEP) in Procedure Letter #6, dated March 30, 2020, after Governor Mike DeWine declared a state of emergency for the entire state of Ohio (Executive Order 2020-01D) to protect the well-being of the residents of Ohio from COVID-19. The State of Emergency was lifted on June 18, 2021, and this policy flexibility ended on July 30, 2021.

**Verbal Signatures**

With the COVID-19 infection rate increasing over the last two months, and local workforce development areas and CCMEP lead agencies continuing to adapt to challenges arising from the COVID-19 pandemic, Ohio is renewing the policy flexibility of accepting verbal signatures effective immediately for all volunteer CCMEP participants who are **not** Ohio Works First (OWF) Eligible. If necessary, case managers will have a period of up to 90 days to allow areas, lead agencies and youth service providers more time to obtain an electronic signature, photocopy of signature or wet signature for required documentation.

This CCMEP procedure letter confirms that verbal signatures by phone are allowed for all volunteer CCMEP applicants/participants as long as they are **not** an OWF Work Eligible. These volunteer applicants/participants may verbally sign Individual Opportunity Plans (IOPs), CCMEP assessments, eligibility applications (JFS 3002), and other required forms under Ohio Administrative Code rule 5101:14-1-04, 5101:14-1-05, and WIOAPL 15-07.2, including the JFS 13186, Self-Attestation and the JFS 13187 Citizenship Status/Authorization to Work Self Attestation. Case managers must obtain an electronic

signature, photocopy of signature or wet signature for required documentation within 90 days of accepting a verbal signature.

These documents may thereafter be utilized as documentation for WIOA Youth or CCMEP TANF eligibility criteria. Within this self- attestation, the individual must document which specific elements of eligibility he or she is attesting (e.g., age, birthdate, authorization to work, income, barrier to employment,etc.) and how he or she meets the eligibility criteria.

For any criteria where self-attestation is not permitted in accordance with [Attachment A of WIOAPL 15-07.2](#) such as age/birthdate, source documentation must be collected from the participant within 90 days or verified through another source.

Case notes must be entered in Ohio’s workforce case management system with specific dates of conversations, communication method, and details on what documentation must still be collected. Verbal signatures should be documented in Ohio’s workforce case management system in case notes using “On [Insert date] [Insert client name] provided a verbal signature to the [Insert form name(s)] via [Insert communication method]. A copy of the [Insert form name(s)] has been mailed to the client. The reason a verbal signature was necessary is because [Insert reason/justification]”

Prior to accepting a verbal signature, case managers *must* read the contents of the form including any rights and responsibilities. Following the acceptance of any verbal signature(s), a copy of the relevant form *must* be mailed to the client.

### **Electronic Documents and Signatures**

Please note that case managers may accept electronic documents and signatures from clients. Any documentation gathered electronically must be done in a manner that is secure and encrypted to protect a client’s personally identifiable information (PII). Please refer to Section VI(D) of [WIOAPL 15-07.2](#) for guidance on the handling and protecting of PII.