

TEGL 04-00 Attachment 1

E28: During the period of July 1, 2000 through September 30, 2000, may WtW operating entities continue to spend Federal formula funds on individuals that were already enrolled in the WtW program as of June 30, 2000?

Yes, such individuals should experience no interruption of service or expenditure activity during this period. (June 30, 2000)

E29: May WtW operating entities enroll an individual in the program between July 1, 2000 and September 30, 2000, if (s)he ONLY meets the old eligibility criteria for the WtW program?

No, the new eligibility criteria take effect on July 1, 2000, and supercede the old eligibility criteria in effect up to that date. Therefore, an individual meeting **ONLY** the old criteria would not be eligible and could not be enrolled in the WtW program. However, because the new eligibility criteria are much broader than the old criteria, we expect that most individuals who could have met the old criteria will also meet the new criteria. Some individuals might not, however, such as a noncustodial parent who has barriers, etc., but who does not meet the new criteria for noncustodial parents (unemployed, underemployed, or having difficulty paying child support obligations, etc.). (June 30, 2000)

E30: May WtW operating entities enroll an individual in the WtW program between July 1, 2000 and September 30, 2000 if (s)he ONLY meets the new criteria? May WtW operating entities spend Federal formula funds on these individuals?

WtW operating entities may only enroll individuals meeting the new eligibility criteria in the WtW program beginning July 1, 2000. However, until October 1, 2000, WtW operating entities cannot spend Federal formula funds on individuals who meet the new eligibility criteria but who would not have met the old eligibility criteria. The intent of this restriction is to prevent the outlay of Federal WtW formula funds until the first day of fiscal year 2001. It is not intended to prevent the normal incurrence of unpaid obligations until that date, provided that Federal WtW formula funds are not drawn down to liquidate the obligations until October 1, 2000. Therefore, operating entities may not draw down WtW formula funds from the Federal Treasury until that date. During the period of July 1, 2000 to September 30, 2000, operating entities may expend matching funds and/or may incur unpaid obligations within the normal course of business, provided that the timing of those transactions ensures that the draw-down of Federal WtW formula funds to liquidate the obligations will not occur until October 1, 2000. (June 30, 2000)

E31: May WtW operating entities enroll an individual in the WtW program between July 1, 2000 and September 30, 2000 if (s)he meets BOTH the old and new eligibility for the program AND spend Federal formula funds on him or her during this three-month period?

Yes, during this three-month period, WtW operating entities may enroll and spend Federal formula funds on an individual who **BOTH** meets the new eligibility criteria and would have met the old eligibility criteria. The 1999 Amendments only restrict expenditures from allotments for individuals who “would not have been eligible before July 1, 2000.” (June 30, 2000)

E32: Can WtW operating entities enroll an individual who meets the old criteria under the 30 percent provision AND meets the new criteria under the 70 percent (general eligibility and noncustodial parents provision) under the new 70 percent provision after July 1, 2000? Can WtW operating entities spend Federal formula funds on this individual?

Yes, WtW operating entities may enroll an individual who meets the new general eligibility or noncustodial parents criteria under the 70 percent provision as long as the individual would have met either the “old” 30 percent or “old” 70 percent criteria. WtW operating entities may spend Federal formula funds on this individual between July 1, 2000 and September 30, 2000. The 1999 Amendments only restrict expenditures from allotments for individuals who “would not have been eligible before July 1, 2000.” (June 30, 2000)