EARN

EMPLOYMENT ADVANCEMENT AND RETENTION NETWORK

PROGRAM POLICY AND PROCEDURES MANUAL

DEPARTMENT OF HUMAN SERVICES
PROGRAM YEAR 2020 – 2021

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SECTION 1 – INTRODUCTION

Program Overview

Employment Advancement and Retention Network (EARN) is designed to provide a range of services to meet individuals' needs, including access to education and training opportunities to move clients toward family economic stability. The program is based on human-centered design and includes a combination of case management, coaching, licensed counseling, and peer--to--peer experiences to develop a career pathway through job placement and job retention goals for the participants referred from the County Assistance Office (CAO).

Eligibility Criteria

CAO staff will determine eligibility for the EARN program and refer clients to EARN based on CAO policy and procedures.

Individuals eligible for Temporary Assistance for Needy Families (TANF), and ineligible for or declining Diversion, may be referred to the EARN contractor. The hours of participation are determined by the household composition for TANF.

SECTION 2 – REFERRALS

Program Referrals

Outreach efforts to increase program enrollment rates and continued participation are expected to begin when a program receives a referral in the Commonwealth Workforce Development System (CWDS). Outreach efforts are to include contacting program participants prior to their enrollment date to introduce themselves and their program, confirming the participant's attendance, and answering any additional questions that the participant may have. Programs must make a minimum of three contact attempts should the initial attempt be unsuccessful. Documentation of contact attempts is required. Programs are required to develop a plan for referral outreach available to the Bureau of Employment Programs (BEP) via the Program Implementation Plan (PIP).

The provider will make every reasonable accommodation to accept referrals every day of the business week.

EARN programs may set their orientation times and dates; however, a client must be given opportunity to report to the program and should not have their referral rejected if they are late for the program's orientation or scheduled appointment date. Initial meetings with the client may be done via phone or other electronic means. The client does not need to physically report to the EARN center to be enrolled in programming.

In the case of an employed individual being referred to EARN for additional participation hours, case managers should meet with the client at a time and location that does not interfere with the client's scheduled work hours.

It is required that the program work with the CAO before referral rejecting a client.

The EARN provider must act on the CAO referral within 14 calendar days of the referral date.

> **NOTE:** The referral date is not included in this count. It is day zero.

Project Referral Rejection Codes

If the client does not show for orientation the EARN service provider will conduct outreach to the client in an attempt to enroll and engage the client. If the client refuses to cooperate at the orientation, the provider should speak with the client one-on-one to determine how they can assist the client in engaging in and successfully completing the program.

Referral rejection codes will be used to track the reason a client's referral to EARN is rejected prior to enrollment. The EARN service provider must data enter these codes in CWDS.

The following project referral rejection codes may be used with EARN:

Code 1 – Failed to report (after documented repeated attempts at outreach)
Code 2 – Refused to cooperate (after documented repeated attempts at outreach)
Code 4 – No Action Taken (System Generated)
Code 5 – Other
Code T – Referred in error

SECTION 3 - ENROLLMENTS

Initial Program Enrollment

The EARN service provider must enroll the client in the program on the date they report to or agree to participate via phone or other electronic means. Data entry of the client's enrollment in CWDS must be completed within three business days of the date of enrollment.

> **NOTE:** The client's reporting date is not included in this 3 business-day count.

To enroll a client (Project Code D—or NC for Philadelphia), the EARN service provider will enter an enrollment date in CWDS. After enrolling the client in the program, the EARN service provider must open at least one activity code to track participation. Under **NO** circumstance is a client to have an open project without an open activity code.

Once notified that the participant is to be enrolled, the EARN service provider will conduct a case review to become familiar with the client's background and situation in order to determine what additional assistance the participant will need to achieve family economic security. The EARN service provider will review the information below:

- Family and social history
- Medical information including physician, clinic, and hospital records
- Work history
- Information regarding services the participant is receiving from other agencies or providers
- Case narratives
- Job readiness assessment
- Agreement of Mutual Responsibility (AMR), (for ETANF participants this includes eligibility track number and the reason for eligibility)
- Information regarding the participant's current and past participation in Employment and Training (E&T) programs
- Educational activities and outcome of those experiences
- Any other pertinent information

Each participant shall have an in-person orientation, either individually or in a group, to the EARN Program within five business days of the participant's referral. During participant orientation the EARN service provider must review the EARN policies and participant requirements with the participant, including:

- The goals and purpose of the program
- The overall approach to reaching these goals including participation in a joint planning process to identify needs and appropriate activities

- Attendance requirements to include hourly requirements, holidays, excused and unexcused absence policy
- Participant and EARN rights and responsibilities
- Explanation of how participant progress is tracked and measured
- Information on the grievance procedure
- Confidentiality agreement
- Authorization for release of participant information
- Program requirements (lunch, breaks, behavior, dress code, reporting changes, income, submission of paystubs to the EARN and the CAO)

For TANF participants, the EARN service provider and its team shall conduct an in-person comprehensive household assessment that identifies participant strengths and barriers to employment and family economic security. The assessment shall be completed within 7 business days after the enrollment date. As part of the assessment, the participant's social indicators of health (SIOH) shall be identified, including but not limited to:

- Interests and goals
- Household composition
- Current employment and financial status
- Education
- Language and literacy (including English proficiency)
- Housing
- Food security and nutritional education
- Clothing
- Transportation
- General and mental health
- Drug and alcohol dependency
- Criminal History
- Criminal background inquiry and checks
- Domestic violence
- Pregnancy
- Childcare and parenting
- Support network
- Work experience
- Work Capacity Assessment if required

The appropriate activity for the assessment period will be AC 8 - Assessment. Based on the results of the assessment and initial licensed counselor appointment, the EARN program will determine the next appropriate activity and develop the service plan.

Service Plans

The EARN service provider will use the comprehensive household assessment to coordinate with the participant to create and execute a service plan called an Individual Employment Plan (IEP) in CWDS. The IEP will be a living document. In coordination with the participant, the EARN service provider shall develop and use the IEP as the comprehensive plan to:

- describe goals, objectives, interests, and planned services of the participant, as determined from the assessment
- promote strategies to be instituted to address the participant's barriers and achieve goals to gain and maintain family economic security such as:
  - o Treatments (including substance use disorder treatment, mental health treatment, and other rehabilitative treatments)
  - o Interventions (including crisis mitigation and barrier remediation)
  - o Education
  - o Training and credentialing
  - o Work experience (such as pre-apprenticeship or other unpaid work experience)
  - o Community service opportunities
  - o Job readiness and skills (such as soft skills and employment tools, basic life skills, barrier remediation, career exploration, assessments, and aptitude testing)
- measure goals, including specific outcomes, to be achieved to demonstrate stabilization of the participant's barriers and needs, the time frame(s) for achieving them, the resources available and to be used to realize the outcomes, and the desires and motivation of the participant that may have an impact on their success
- if required, work with a multidisciplinary group consisting of a CAO worker or an agent authorized by the Department and professionals from various disciplines, which may include physicians, psychologists and vocational or behavioral rehabilitation specialists to develop a service plan that meets the needs of the participant

In order to remain enrolled in EARN, the client must agree to the terms of the IEP and sign and date the document at the time of completion, as well as at the time of any updates.

> **NOTE:** The EARN service provider is to create the IEP in CWDS 2.0 using the Add Plan feature.

> **NOTE:** Noncompliance with the IEP should be documented in the case notes and discussed at the local DST meeting.

As part of the ongoing services to the participant, the EARN service provider will:

1. Conduct and document participant contacts on all days of engagement in unpaid activity time. This can be done via face-to-face meetings, telephony, or electronic means. The EARN service provider shall use one or more of the following methods and/or other

appropriate methods deemed helpful in engaging and supporting the participant in working through the IEP:

- Intensive case management
- Coaching
- Peer-to-peer experiences

2. Identify and refer the participant and/or their family to the appropriate local community resource(s) to achieve goals identified in the IEP, such as:

- Shelter
- Education
    - o Adult Basic Education
    - o English as a Second Language
    - o Post-secondary institutions
    - o Keystone Education Yields Success (KEYS) providers
    - o Education Leading to Employment and Career Training (ELECT)
    - o WIOA Title I Individual Training Accounts
    - o Registered Pre-Apprenticeships
- Legal Assistance
    - o Legal services
    - o Criminal background inquiries and checks
    - o Criminal record expungement
    - o Pennsylvania Legal Aid Network
- Life skills, including:
    - o Financial literacy
    - o Parenting
    - o Nutrition
    - o Other appropriate information
- Another Employment & Training Provider
    - o EARN program in another area
    - o Work Ready
    - o KEYS
    - o ELECT
    - o SNAP 50/50
    - o SNAP EARN

3. Advocate for the participant and their family when connecting to local community resources by providing participants with:

- an active connection and point of contact
- assistance with application and scheduling

- ongoing case management and services while participant engages with the community resource

4. Employ or have arrangements to provide access to licensed professional counselors, social workers, therapists, allied health professionals or a combination of these professionals to provide counseling services and outlets for discussion regarding any and all aspects of a participant's life. This can be inclusive of mental, social, physical, emotional and behavioral health which may be beyond the scope of regular provider staff.

   - Licensed professionals must be available in sufficient numbers so that each participant is able to have an introductory 1-on-1 meeting with an appropriately licensed professional within 14 business days of their program enrollment.
   - Licensed professionals must be made available on site at least one day per month. 1-on-1 meeting days comply with this requirement.
   - Licensed professionals must be made available to participants upon request. The licensed professional, or their organization, must respond to participant requests for services within 24 hours. At a minimum the response must include documented outreach to schedule an appointment.
   - The EARN service provider shall require the professional to have flexible hours of contact, including but not limited to weekends and after "traditional" work hours.
   - The EARN service provider shall continue to provide participants with access to these services as often as needed through the end of the 12-month retention period.

5. Provide activities and programs that lead to acquiring job-related and job readiness skills in addition to education and employment activities. Some job-related and job readiness skills may include but are not limited to:

   - Time management
   - Analytical thinking
   - Executive function and decision making
   - Verbal and written communications
   - Leadership
   - Professional behaviors and attire
   - Career exploration
   - Aptitude testing
   - Interpersonal communication
   - Collaboration
   - Problem solving
   - Financial literacy
   - Resume writing
   - Interview techniques
   - Education on regional High Priority Occupations and local job market

6. Provide or refer participants to formal credentialing programs or trainings, which may include:

   - Industry skill certifications to achieve and demonstrate skills necessary for specific occupations
   - Upgrades of an individual's job-related skills including instructional certificate programs that are awarded based upon completion or accumulated credits
   - Associate degree programs including those that result in an Associate of Arts, Associate of Science, or an Associate of Applied Science degree
   - Baccalaureate degree programs including those that result in a Bachelor of Arts, Bachelor of Science, or a Bachelor of Applied Science degree
   - Organized educational programs that are directly related to the preparation of individuals for employment in current or emerging occupations requiring training other than a degree
   - High School Equivalency, Adult Basic Education, and English as a Second Language programs as part of a career pathway when these classes are integrated within, being taken concurrently with, or for a limited-duration prerequisite to post-secondary education or training as part of a career pathway program

7. Facilitate the transfer of participants to other DHS employment and training programs, when appropriate and approved by both the CAO and the receiving program. Program transfer options include, but are not limited to:

   - KEYS: The EARN service provider shall transfer to the KEYS program those participants who have enrolled at a Pennsylvania community college to pursue an education activity that leads to receipt of a diploma or certificate. The EARN service provider shall coordinate educational activities at community colleges with the KEYS program and shall terminate the EARN participants who meet all requirements for KEYS and desire to participate in KEYS. The EARN service provider shall facilitate the referral and transfer to KEYS. The EARN service provider may not terminate EARN participants who have expressed interest in community college but have not yet enrolled. The EARN service provider shall coordinate with the KEYS Program Coordinator when participants express a desire to enter community college. If such participants subsequently enroll in a community college, the EARN service provider shall terminate the EARN participant who meets all requirements to enroll in KEYS and shall facilitate the referral and transfer to KEYS. The KEYS program will request an updated AMR and referral to KEYS from the CAO using the reverse referral process.

   - ELECT is a joint initiative between the Department and Pennsylvania Department of Education that enables school districts and intermediate units to help pregnant and parenting teens earn a high school diploma or HSE credential, become better parents and transition to employment, career training or higher education. Their services are available to students ages 22 and younger. The EARN service provider

shall coordinate educational activities with the ELECT programs and shall terminate the EARN participation of TANF participants who meet all requirements to enroll in ELECT and desire to do so and shall facilitate the referral and transfer to ELECT. The ELECT program will request an updated AMR and referral to ELECT from the CAO.

8. Place participants in unsubsidized employment. To identify and fill employment opportunities, the EARN service provider should utilize the resources within the local area including but not limited to, Workforce Development Boards, existing and newly developed relationships with local employers, chambers of commerce, employer lead groups, career workshops, job fairs, and Registered Apprenticeship programs. The EARN service provider shall require participants meet in person with potential employers, where appropriate. The EARN service provider shall advocate and advise their participants to accept employment consistent with their IEP even if the employment will not result in a placement performance outcome.

   The EARN service provider achieves a placement performance outcome when a participant is working in unsubsidized employment (Activity 33) at least 80 hours in a four consecutive week period at the higher of the state minimum wage plus two dollars per hour or the federal minimum wage plus two dollars per hour. Once the participant is placed in employment and has entered the retention period, the EARN service provider shall contact the participant weekly for the first three months and bi-weekly or as often as needed based on the participant's IEP thereafter.

9. Provide wraparound services. Wraparound services are TANF employment and training services specific to individuals who are required to meet a certain hourly work requirement to be compliant with the federal TANF employment and training requirements but who simultaneously participate in unsubsidized employment. For the purposes of service provision, the EARN service provider shall provide wraparound services to participants who are not able to meet the TANF hourly work requirements through unsubsidized employment alone when TANF benefits remain open.

10. Assist and incentivize participants who obtain employment to achieve satisfactory performance, retain employment, and to increase earnings over time through the provision of retention services. The EARN service provider shall provide retention services when an individual obtains unsubsidized employment and is placed in CWDS Extended Hold indicating the initial TANF recipient supports and services have ended, and retention supports and services have begun. The EARN service provider shall provide retention supports and services for up to one year after the participant's TANF benefit closes due to earned income.

Refugee Participants

When a qualifying immigrant eligible for refugee benefits enters the country, they do not have a social security number immediately. For Cuban/Haitian Entrants (Cuban/Haitian parolees) they also do not have work authorization and must apply for an "EAD" or Employment Authorization Document (which is a card). Those "refugees" who are eligible for benefits must engage in employment and training activities as a condition of eligibility while they receive Refugee Cash Assistance (RCA) for a limit of 8 months from date of entry.

For refugee participants, the EARN service provider will:

- Accept refugee participants in counties where there is no readily accessible refugee employment service provider.

- Provide specialized job development and case management services remotely for the benefit of the refugee participant.

Determining Hours of Participation

The number of core and noncore hours in which a client is required to participate will be determined by the CAO and recorded on the client's AMR. The EARN service provider must ensure the client participates for at least the minimum number of hours required. The chart below shows the hourly requirements for TANF recipients as defined by federal regulations.

Participation Hours

Core Hours: Required for all individuals who are mandatory to participate in Road to Economic Self-Sufficiency through Employment and Training (RESET).

Noncore Hours: Available if additional hours are needed to meet the minimum work requirement after the required core activity hours are met or when all opportunities to participate in a countable core activity have been exhausted or are not available.

Case Management Hours: Available if a client has run out of time limited barrier remediation activities or other core/noncore activity codes are not available or appropriate based on the client's IEP. It should be used when participants are involved in intensive case management, including weekly participant contacts, face to face meetings, and participation in barrier remediation appointments and activities. This code is not federally recognized as a core or noncore activity.

An individual can participate in more than one core activity to meet the minimum work requirement. Once the required number of core hours are met, an individual may choose to participate in any core or noncore activity.

HOUSEHOLD COMPOSITION	MINIMUM HOURS per WEEK
SINGLE PARENT	
child under age 6	20 hours in a core activity
all children over age 6	30 hours with at least 20 in a core activity
pregnant/no other children	30 hours with at least 20 in a core activity
under age 22, head of household	Meeting participation requirement if satisfactory attendance at a secondary school or GED program. Enter 20 hours
TWO-PARENT	
both parents under age 22, heads of household	Meeting participation requirement if satisfactory attendance at a secondary school or GED program. Enter 20 hours for each parent.
not receiving federally funded childcare	35 hours combined. One parent must participate in at least 30 hours in a core activity
receiving federally funded childcare	55 hours combined, at least 50 hours in a core activity. One parent must participate in at least 30 hours in a core activity. Either parent may participate for any remaining activity hours in noncore activities
one parent DS, NS or DF not receiving federally funded childcare	One parent must participate in 35 hours, at least 30 hours in a core activity
one parent DS, NS or DF receiving federally funded childcare	One parent must participate in 55 hours, at least 50 hours in a core activity
one parent disabled – J parent	20 or 30 hours depending on the family composition. One parent must participate for 20 hours in core activities and childcare does not affect the number of participation hours
one parent ETP code 53	30 hours. One parent must participate for 20 hours in core activities and childcare does not affect the number of participation hours

Monthly TANF Sample

The monthly TANF sample is a random selection of cases that are submitted to, and reviewed by, the federal government as a part of the federal TANF Data Report. This report is used to determine the commonwealth's work participation rate (WPR). The Administration for Children and Families (ACF) requires that each state meet a WPR of 50 percent all-family rate and a 90 percent two-parent rate. The WPR is a measure of how many mandatory TANF families are meeting participation requirements per federal regulations. States face significant financial penalties for failure to comply with the required WPR. States are permitted to use a Caseload Reduction Credit (CRC) to assist in achieving their WPR. The CRC is a credit that reduces the target states are required to achieve by a percentage point for every percent of caseload decline. This calculation is based on the 2005 base year.

EARN contractors serve a large number of Pennsylvania's mandatory participant population that must comply with work participation requirements in order to ensure the state meets its goal.

Because the sampling process is random, there is no way to know which cases will be selected as part of the monthly sample. For this reason, it is important that providers properly data enter all activities and work with participants to achieve their required core and noncore hours for each month they receive a TANF payment. For verification purposes, documentation should be kept in the case records for all participation hours.

SECTION 4 – Employment and Training (E&T) ACTIVITIES

E&T Activity Codes and Descriptions

E&T Activity Codes will be used to track the activities in which the EARN client is engaged at any specific time. The EARN service provider will data enter the activity codes in CWDS. Multiple activity codes can be entered at the same time; however, the activity codes in CWDS and the activities listed on the IEP must agree.

The EARN service provider must enter participation hours after the client attends the service or activity and documentation is provided.

The activity codes that may be used in the EARN program are listed in the table on the following pages, along with descriptions of each code. Please note the designation of core or noncore for each activity, as well as durational time limits and important notes.

It is important to note that self-initiated education clients can remain in their educational track. EARNs should encourage and support clients as they seek to improve themselves through education. See the self-initiated student section below for more clarification.

> **NOTE**: Self-initiated clients who are enrolled in EARN should have the appropriate activity code opened along with the appropriate sub-project code. See the Self-Initiated Students Section.

Remote Activities and Service Provision

Contracted providers are responsible for developing a remote participation plan for everyone who will be using this option as part of the PIP. Remote participants must use form PA 1895 (Employment and Training Weekly Activity Verification Form) to log their activities, including the date of the activities, type of activity, their E&T case manager's contact information, and the begin and end times for each activity recorded. When the log is completed, the participant must transmit it (via mail, fax, or electronically – pictures are acceptable via phone) to the E&T case manager. In difficult times, contracted providers may complete the PA 1895 with the client and request their signature at a later time, but prior to the monthly reporting deadline.

Daily Supervision

Daily supervision must be provided by the contracted program. Daily supervision does not mean daily in-person contact. The supervision may be by telephone or electronic contact (email/text) and ensures that the individual participates and progresses in their assigned activities. The contact should occur on the days the individual is scheduled to participate.

E&T ACTIVITY CODES AND DESCRIPTION

Activity	Code	Description	Core/ Noncore	Durational Limits	Comments
Providing childcare for a community service participant	6	The hours a TANF client spends caring for a child of another TANF client who is participating in community service.	Core	None	
Enrolled in a KEYS approved educational institution.	14	Educational activity offered by an accredited KEYS post-secondary institution	Core	24 months with six-month extensions available. *	See self-initiated student section below. Termination with "code" 9 – completion will result in a credentialing benchmark.
Enrolled in any non-KEYS Post-Secondary Education	16	Educational activity offered by an accredited non-KEYS post-secondary institution	Core	24 months with six-month extensions available. *	See self-initiated student section below. Termination with "code" 9 – completion will result in a credentialing benchmark.
Satisfactory attendance in secondary school/GED/HSE	18	Educational activity offered by an accredited high school or HSE provider.	Core	None	This is a core activity for participants under 22 years of age. When the participant maintains satisfactory progress as determined by the educational provider, the client will receive credit for compliance with 20 hours per week of activity. *
Community Service	20	Community Service must be unpaid work for the federal, state or local government, or a non-profit organization to increase skills and attain an employment history including AmeriCorps Vista Volunteer Community Service.	Core	None	CAOs determine number of hours per week allowed in this activity based on the Fair Labor Standards Act Law (FLSA). CAO caseworker is to note the number of hours on the client's AMR. Client cannot exceed the maximum number of allowable hours calculated under the FLSA as determined by the CAO. If maximum hours allowable are < 20 hours per week, hours may be deemed up to 20 if the individual participates in community service for the maximum number of allowable hours. Community service hours may only be deemed to the federal 20-hour core requirement.

E&T ACTIVITY CODES AND DESCRIPTION

Activity	Code	Description	Core/ Noncore	Durational Limits	Comments
Work Experience (Unpaid)	21	Unpaid work experience in exchange for cash assistance benefit providing skill/work habits to obtain employment. Currently used for Registered Pre-Apprenticeships.	Core	None	Client cannot exceed the maximum number of allowable hours calculated under the FLSA as determined by the CAO. If maximum hours allowable are < 20 hours per week, hours may be deemed up to 20 if the individual participates in community service for the maximum number of allowable hours. Community service hours may only be deemed to the federal 20-hour core requirement.
On-the-Job-Training	22	On-the-job training provides public or private sector employers with a wage subsidy for a negotiated period of time. On-the-job training programs require the employer to provide specialized training to the participant. In order to use On-The-Job-Training as an activity, programs must enter into a written agreement with the employer.	Core	None	Termination with "code" 9 – completion, will result in a credentialing benchmark.
Subsidized Employment	23	Subsidized employment provides public or private sector employers with a wage subsidy for a negotiated period of time. Subsidized employment programs do not require the employer to provide special training to the participant other than that which any other employees in the same position would receive. In order to use subsidized employment as an activity, programs must enter into a written agreement with the employer.	Core	None	Termination with "code" 9 – completion, will result in a credentialing benchmark.

E&T ACTIVITY CODES AND DESCRIPTION

Activity	Code	Description	Core/ Noncore	Durational Limits	Comments
Vocational Education	24	Vocational education provides training in specific occupational skills needed in the current job market.	Core	Skill/vocational training is a time limited TANF activity. Clients are limited to 12 months in a lifetime based on federal regulation. DHS has chosen to allow clients to exceed the federal 12-month lifetime limit on this activity to 24 months with 6-month extensions available for participants obtaining a credential/certification. *	DHS stresses that the use of vocational education should be matched to specific career field and lead to a certificate or diploma that is accepted by area employers. The school's study policy must be obtained and retained. This document identifies the number of study time hours expected by the school. A student can receive one hour of unsupervised study time for one hour of class time with no verification needed. Study time that is documented and monitored by the E&T contractor or an accredited education provider can also be counted. Total study time hours, unsupervised and supervised, may not exceed the number of study time hours expected for the course as determined by the school's study policy. Additional activities may be embedded within the curriculum and include ABE, ESL and GED. Termination with "code" C – completion, will result in a credentialing benchmark.
Paid Work Experience (PWE)	26	PWE is an opportunity for clients to enhance workplace skills and employability. PWE is subsidized employment.	Core	Current DHS regulations allow this activity for a maximum of twelve months in an individual's lifetime with the following exceptions: PWE may be extended if an individual has a disability covered under the provisions of the ADA or if an individual must withdraw from PWE for good cause such as injury.	CAH 135.2 limits PWE to 20 hours per week at minimum wage. Termination with "code" 9 – completion, will result in a credentialing benchmark.
Work Study	31	Work Study is subsidized employment at a post-secondary educational institution. It is paid employment in which a student gains practical experience in the workplace. The wages do not impact the family's TANF or SNAP grant.	Core	None	Must be subsidized wages and be done in conjunction with an educational program at an accredited institution.

E&T ACTIVITY CODES AND DESCRIPTION

Activity	Code	Description	Core/ Noncore	Durational Limits	Comments
Unsubsidized Employment	33	Unsubsidized employment is full or part-time employment, including self-employment, in which neither the employer nor employee receives a subsidy from TANF or other public funds. The program must document the job start by obtaining a copy of a pay stub or a letter from the employer on company stationery.	Core	None	
Assessment/ Job Search/ Prep Training / Rehabilitation Services	8	Assessment is an activity used to track the completion of the initial comprehensive household assessment conducted after enrollment, as described in Section 3 – Enrollments - "Initial Program Enrollment."	Core	TANF clients cannot participate in AC 8/42/49 for more than four consecutive weeks. After a four-week consecutive period of participation, the client must be enrolled in another activity for at least one week. For this purpose, one hour of AC 8/42/49 in a week counts as a week of participation. Clients also may not participate in AC 8/42/49 for more than 12 weeks in a rolling 12-month period. For the 12-week limit, one week of AC 8/42/49 is defined as: -20 hours for a work-eligible single custodial parent with a child less than six years of age for a total limit of 240 hours. -For all other work-eligible individuals, one week is defined as 30 hours for a total limit of 360 hours.	This code group is subdivided for tracking purposes. The durational limits apply to the use of all three codes combined. A client may participate in a combination of these activities in the same week.
	42	Job Search/ Prep Training is an activity that consists of seeking full time or part time employment that is combined with organized training that prepares an individual for the workplace.			
	49	Rehabilitation services include services to prepare individuals for employment such as (but not limited to) criminal history, family services, homelessness/housing, domestic violence, and vocational rehabilitation. Also, substance abuse treatment, mental health treatment, or rehabilitation activities if such treatment or therapy is determined to be necessary and documented by qualified medical, substance abuse, or mental health professionals.			

E&T ACTIVITY CODES AND DESCRIPTION

Activity	Code	Description	Core/ Noncore	Durational Limits	Comments
Vocation-Specific Work Experience (VWE)	51	VWE is subsidized public sector employment with provides work experience, which is directly related to an individual's field of study during their enrollment in vocational or post-secondary education.	Core	None	As in many adult education models, it is important that classroom theories are applied in a "real life" environment to ensure that students can more readily connect theory and practice, which results in helping them become more employable. VWE is intended to offer the individual the opportunity to apply their current course of vocational or post-secondary education in a vocation-specific work setting.
English as a Second Language (ESL)	11	ESL is part of a training plan specifically designed to improve the individual's English language proficiency needed to compete successfully in the current job market. The ESL curriculum focuses on vocabulary and reading assignments which relate to the participant's current plan for obtaining employment.	Noncore	None	Must maintain satisfactory participation. If embedded within a Career Pathway Program, HSE may be tracked under Activity Code 24 (core activity). All participants in need of ESL may pursue English language training. In all instances, participants will receive good cause to waive the requirement to fulfill additional core or noncore hours and activities. *
Adult Basic Education/Literacy (ABE)	12	ABE is designed to increase literacy and computational levels consistent with employment goals.	Noncore	None	Must maintain satisfactory participation. If embedded within a Career Pathway Program, HSE may be tracked under Activity Code 24 (core activity). All participants in need of ABE may pursue basic adult education. In all instances, participants will receive good cause to waive the requirement to fulfill additional core or noncore hours and activities. *
Satisfactory attendance in secondary school/GED/HSE	18	Educational activity offered by an accredited high school or HSE provider.	Noncore	None	This is a noncore activity for participants 22 years of age and older. Must maintain satisfactory participation. If a standalone activity, the CAO will grant good cause not to meet the required core hours. If embedded within a Career Pathway Program, HSE may be tracked under Activity Code 24 (core activity). *

E&T ACTIVITY CODES AND DESCRIPTION					
Activity	Code	Description	Core/ Noncore	Durational Limits	Comments
Noncore Vocational education for a client without a high school diploma or GED	34	Vocational Education provides training in specific occupational skills needed in the current job market.	Noncore	None	This code is for clients without a high school diploma or GED.
Noncore Vocational education for a client with a high school diploma or GED	35	Vocational Education provides training in specific occupational skills needed in the current job market.	Noncore	None	This code is for clients with a high school diploma or GED.
Job Skills Training Directly Related to Employment	38	Job skills training directly related to employment is formal training provided by a contracted E&T contractor, that is specifically designed to improve an individual's skills on the job and may include continuing education or job skills courses.	Noncore	None	Any post-secondary noncore vocational education activity.
Case Management	92	Time spent by participant in barrier remediation appointments and activities, including weekly participant contacts, and face to face meetings.	N/A	None	This code should be used if a client has run out of time limited barrier remediation activities or other core/noncore activity codes are not available or appropriate based on the client's IEP.

Please refer to Education Policy OPS – MEMO #20-08-01 (Attachment M) for further clarification on activities and durational time limits.

Ongoing Licensed Counseling Services

If it is determined the participant will receive ongoing services provided by the EARN service provider's licensed counselor, the provider will implement the following procedure:

- All participants receiving counseling services will be indicated by the opening of the CWDS sub-project code 78.
- For all sub-project code 78 participants, the appropriate CWDS activity codes are 49 and 92 as defined in the table above. The specific activity code will be determined based on individual participant's circumstance regarding the time-limited activity code 49.
- Appropriate CWDS case progress notes will be updated as the participant proceeds through the counseling services.

Self-Initiated Students

TANF participants who self-enroll in post-secondary education–also known as self-initiated students—will be referred to EARN from the CAO. EARN is responsible for case management, verification and data entry of participation hours, and job placement assistance after graduation. Self-initiated students fall into two main categories 1.) KEYS Expansion Students and 2.) Non-KEYS Students.

Student Category	Activity Code	Sub Project Code 1	Sub Project Code 2	Core Y/N	Durational Limits	Comments
KEYS Expansion (Enrolled in a KEYS approved educational institution)	14	45: Career & Tech Students 46: State-Owned University Students	48: Students who are in months 13 to 24 of voc ed time 49: Students who are in month 25 or over of voc ed time	Y	24 months with 6-month extensions available. Enter an additional sub-project code if beyond 12 months. (See Sub Project Code 2 in chart)	For a complete list of schools, see attachment below: 📄 PDF KEYS Expansion Institutions.pdf
Non-KEYS	16	50	n/a		24 months with 6-month extensions available	
	24*		n/a		24 months with 6-month extensions available for participants obtaining a credential/ certification.	
Study Time Policy						
The school's study policy must be acquired and retained. This document identifies the number of study time hours expected by the school. A student can receive one hour of unsupervised study time for one hour of class time with no verification needed. Study time that is documented and monitored by the E&T contractor or an accredited education provider can also be counted. Total study time hours – unsupervised and supervised–may not exceed the number of study time hours expected for the course as determined by the school's study policy. *AC 24: Additional activities may be embedded within the curriculum and can include ABE, ESL, and HSE.*						

Credentialing and Training Services

The EARN service provider must provide credentialing and training opportunities for participants as outlined in this section. Vocational educational training is defined as "organized educational programs that are directly related to the preparation of individuals for employment in current or emerging occupations requiring training other than an advanced degree."

All vocational education activities conducted in-house, whether designed to provide a credential/certification or not, must be matched to a growing job market within the Workforce Development Area.

Secondary equivalency

Secondary equivalency is the participation in and completion of a credible HSE program. All participants, regardless of TANF/ETANF status, without a high school diploma or HSE, regardless of age, may pursue HSE. The EARN service provider shall determine whether the structure of the HSE program is suitable to the participant's knowledge base and learning style based on the program's assessment. HSE can be obtained through the General Equivalency Diploma (GED®) test or High School Equivalency Test (HiSET®). In all instances, participants will receive good cause to waive the requirement to fulfill additional core or noncore hours and activities.

Credentialing Programs

Credentials consist of an industry recognized certificate or certification, a certificate of completion of a Registered Pre-Apprenticeship or Registered Apprenticeship, a license issued by the Pennsylvania Department of State or federal government, or an associate's or baccalaureate degree. Credentials measure competence in core content and performance standards in a specific set of work-related tasks. The work-related tasks and assessment must connect with workforce demands. The EARN service provider shall submit proposed credentials to the Bureau of Employment Programs (BEP) for review prior to implementation. In its sole discretion, BEP will approve the credentials. The EARN service provider shall include the following in any credentialing program package:

1. Certification area: A statement including what marketable, valuable skill will be earned by the participant when the program is completed.
2. Program's value: Justification of why the certification is valuable in your area industry, and how developing the skill will improve the participant's chance of gaining employment in a high priority occupation based on the workforce area and moving toward self-sufficiency.
3. Curriculum: The subjects that the certification program will cover.
   Example: If the program is going to lead to a certificate in customer service, list all the subjects covered such as: Proper Dress Codes, Professional Writing Skills, How to Speak to Customers, etc.

4. Syllabus: A day-to-day outline of the progression of the program, including time frames. This should provide detail on how the curriculum will be taught. It also needs to include the goal of each lesson.
5. Assessment: The methods to be used in measuring student progress.
6. Statement of study time expectations (if applicable): Study time will not be granted automatically for these programs. If a client is expected to study outside of class time, then a statement of what the study time expectations are must accompany the program description. If a statement of study time is not submitted, no study time will be allowed when a case is pulled for validation.

If changes are made to the approved certification program, an updated package must be resubmitted for endorsement to BEP at least 10 business days prior to implementation. However, changes should be submitted as quickly as possible as the certification process may take longer. Certification program packages should be submitted to the BEP EARN resource account, RA-BOPEARNPOLICY@PA.GOV.

Non-credentialing
Vocational education activities conducted in-house without the intent of credentialing must be accompanied by a curriculum that is available at the request of BEP. When closing a non-credentialing AC 24, code 1 or 9 should be data entered. Closing code C should not be used.

Vocational Education not provided by the EARN Contractor
Hours of participation and/or certifications will only be recognized for those educational institutions who are approved by the Pennsylvania Department of Education (PDE) to grant degrees or certifications and are operating as a licensed business as registered with the Pennsylvania Department of State (DOS).

Online education/certification will only be accepted if the online institution is recognized by the United States Department of Education as an accredited institution. EARN contractors must be diligent in ensuring they are connecting their participants with educational institutions and programs that will offer the individuals viable and suitable career pathways.

PDE approved training facilities can be searched at the following link:
http://www.edna.pa.gov/Screens/wfSearchEntity.aspx

Businesses licensed with DOS can be searched at the following link:
https://www.corporations.pa.gov/Search/CorpSearch

Online colleges approved by the US Department of Education can be searched at the following link:
https://ope.ed.gov/dapip/#/home

Activity Closing Codes

The EARN service provider is required to data enter an appropriate activity closing code when ending the client's participation in an activity. The code used to terminate the activity will indicate the completion of the activity and must be entered before terminating the project in CWDS.

> **NOTE:** All activities and sub-projects must be end-dated before a termination code can be data entered on the Edit Participant Case Details Screen to end the client's project enrollment.

The following activity closing codes may be used with EARN activities:

Activity Closing Code 1 – Not Complete
Activity Closing Code 9 – Complete
Activity Closing Code C – Credentialing Complete

The CWDS service record must accurately represent a client's scheduled activities. If a client no longer has scheduled days of participation in an activity, the activity must be closed. The activity can be reopened when additional hours of participation are needed to meet AMR requirements.

SECTION 5 – PROGRAM ATTENDANCE & RECORD KEEPING

Attendance Documentation

Participation hours in all activities except unsubsidized employment must be verified by the EARN weekly attendance forms (See Attachment A), vocational education/skills training weekly attendance forms, community service weekly attendance forms (PA 590) (See Attachment B), and/or any other weekly attendance form deemed acceptable by DHS.

To ensure attendance documentation meets minimum requirements and to avoid the need for potential clarification during the monitoring and/or TANF sampling processes, it is required that the EARN provider use the DHS approved EARN weekly attendance form to verify participation hours or the PA 1895 Employment and Training Weekly Activity Verification Form.

When a client participates in community service or vocational education at a location other than the EARN center, the EARN service provider is required to collect documentation from the third party documenting the activities in which the client participated. To ensure continued participation in off-site locations, it is required that documentation be collected weekly. Clients participating in activities at the EARN center must complete and sign the EARN attendance sheet, along with the case manager.

Community Service
Specific forms need to be completed by the client and community service site when a client is participating in community service (See Attachments B, C and D). The maximum number of allowable hours that a client may participate in community service should be documented on the AMR by the CAO. Please reference comments for Community Service in Section 4, E&T Activity Codes and Descriptions.

Vocational Education/Enrolled in KEYS approved institution/Enrolled in non-KEYS
Post-Secondary Education
Hours of participation may be verified using one of the following methods:

1. An instructor, or other college personnel such as, but not limited to, a staff member in the registrar's office, financial aid office, or academic department, may verify hours of participation on a weekly basis, at the minimum. Signatures may be physical or electronic.

2. The contractor case manager may sign the attendance form to verify hours of participation only when there is ongoing contact with the student or when adequate evidence is provided that the student is making satisfactory progress.

    - Ongoing contact is defined as weekly contact with the student
    - Adequate evidence of satisfactory progress could include:

- Electronic communication with the instructor or college personnel to verify that the student is attending class or completing required assignments on a weekly basis
- Weekly progress reports from the college
- Documentation of expected assignments and confirmation of completion and submission of assignments on a weekly basis
- Satisfactory progress is defined as meeting the college's expectations to remain enrolled in the college the following semester

3. Electronic time sheets, time clocks, swipe cards, or telephone time and attendance sheets to verify the hours of participation listed on the attendance sheets.

The school's study policy must be acquired and retained in the client's file. This document identifies the number of study time hours expected by the school. A student can receive one hour of unsupervised study time for one hour of class time with no verification needed. Study time that is documented and monitored by the E&T contractor or an accredited education provider can also be counted. Total study time hours, unsupervised and supervised, may not exceed the number of study time hours expected for the course as determined by the school's study policy.

Absences

Excused Absences
Clients engaged in unpaid work activities may be given participation credit for excused absences. For a client to receive credit for excused absence time, they must have been scheduled to participate on the day and time of the absence. Credit may only be given for the number of hours the client would have been scheduled on that day.

> **Example:** If a client is scheduled to participate in Activity 24 from 9 a.m. to 12 p.m. on Monday but is excused for a medical appointment during that time, they may be credited with three hours of excused time.

A client may receive excused absence credit for up to 16 hours in a month and no more than 80 hours of excused absences within a rolling 12-month period, excluding DHS recognized holidays. An excused absence tracking log should be completed and kept up to date.

When available, the EARN service provider is to collect documentation from a third party describing or documenting the reason for the absence. If third party verification is not available for a particular absence, the EARN is to document the reason for the use of excused time in the case narrative and list the time as excused on the EARN attendance sheet.

Clients can be excused from participation for the following reasons:

- Medical appointments for the client or dependents

- CAO appointments
- WIC appointments
- Legal appointments
- School appointments, including school events
- Counseling appointments
- Housing appointments
- Obtaining childcare
- Child support appointments
- Obtaining birth certificates
- Obtaining documents needed for eligibility for DHS programs
- Obtaining transportation
- Other appointments deemed necessary by the contractor

The use of excused absences must be discussed with the client—the client should be notified of the excused absence hours used and hours remaining.

For working clients, paid annual, sick, or paid time off, as reflected on a client's paystub or pay statement may be included in the number of hours tracked for that time period.

Holidays
Clients receive credit for participation on the following days recognized by DHS as holidays: New Year's Day, Martin Luther King, Jr's. Birthday, Presidents' Day, Memorial Day, Independence Day, Labor Day, Columbus Day, Veterans' Day, Thanksgiving Day and Christmas Day.

For a client to receive credit for holiday time, they must have been scheduled to participate on that day. Credit may only be given for the number of hours the client would have been scheduled.

Make-Up Time
For clients that do not meet their required number of hours in any week, the EARN service provider is required to develop a plan for the client to make up the hours during the month in which the hours were missed. If clients are unable to make up hours within the month, they should still be encouraged to make up missed hours.

Make-up plans should be developed between the client and case manager within a week of the absence. The plan should be maintained in the case record.

EARN providers should consider developing a make-up plan as opposed to using excused absence time when feasible.

Banking Hours
For absences not covered above, including religious holidays not observed by the Department, the EARN provider should allow participants to "bank" hours in the same month as the absence(s). The participant must notify the EARN provider of their intentions in advance and

together they must develop a plan to make sure hourly requirements are still met within the month of the absence.

Employment Documentation

Employment hours must be verified through paystubs, documentation from the employer, DHS approved Employment Verification Form (EVF) (Attachment E) or the Work Number (or similar service). While a participant's TANF benefits are open, all hours entered must be verified and cannot be projected based on a single pay stub. Once employment information is verified, the EARN service provider must enter a placement report in CWDS in order to notify the CAO of the client's earned income.

All employment hours must be documented, and the participant is expected to meet their hourly participation requirements until TANF closure is verified.

Retention

Retention eligibility begins when a participant's TANF benefits close due to earned income. The program will be notified of TANF closure through the CWDS 45 Day Hold alert. The 45 Day Hold alert indicates the client's TANF case has a closure date and the program must contact the CAO to verify the reason for the TANF closure.

> **NOTE:** When a client is eligible for Transitional Cash Assistance (Project Status Code 71), the 45 Day Hold status in CWDS posts shortly before TCA closes. If this is the case, and until a new CWDS dashboard alert can be developed, the contractor must use other resources to determine TANF closure date including:
>
> - County Assistance Offices
> - eCIS
> - CWDS Enrollment Report – Program Status Code
> - BEP Program Monitor / Advisor
>
> If the client is not eligible for TCA, then the 45 Day Hold status in will post in CWDS the day following TANF closure.

If TANF closure results in eligibility for retention services, the EARN service provider will move the client into Extended Hold Status and open sub-project code 01 beginning the day after the TANF case is closed.

During the retention period it is not necessary to collect paystubs for the entire 12 months. Employment verification is necessary at months 6 and 12 for validation purposes. For the intervening months, the EARN service provider may input either zero/null hours OR the provider

may input hours monthly based on the verified hours at placement and the 6-month retention point.

> **NOTE:** If providers choose not to enter hours of participation into CWDS between placement to 6 months and from six months to 12 months there is a risk of skewing program reports and tracking mechanisms in CWDS such as the Null/Zero Hour Report and the Monthly Activity Report.

Retention and Increased Earned Income Verification

The EARN service provider must verify employment at 6 months and 12 months after retention begins. DHS will work with our internal resources to data match wage and income information and distribute it to providers. The provider will be responsible for verifying employment information for participants that cannot be matched and/or verified through DHS mechanisms. The methods of employment verification include but are not limited to paystubs, documentation from the employer, DHS approved Employment Verification Form (EVF), the Work Number (or similar service), or CIS. To meet the Increased Earned Income performance measure, verification of actual income is required.

Retention Services

Retention services should be a continuum of services provided prior to placement. Client contact should occur weekly for the first three months and then bi-weekly, or as often as needed, while the client remains in retention. Retention contacts should include a comprehensive overview of the client's IEP as well as a discussion to determine if the client needs any referrals for services. Programs should look to develop and offer workshops or events that are designed to support employed participants.

Data Entry

EARN service providers may have their own data information system to track program referrals, rejections, enrollments, participant data, activities and terminations. However, CIS, CWDS and DocuShare are the official data systems that DHS will use to validate a client's activities and evaluate achievement of outcomes. EARN provider staff hired to perform data entry are required to attend CWDS training.

DHS has instituted restrictions on timeframes for the data entry of client information into CWDS. These restrictions are necessary to ensure the timely transfer of information from CWDS to CIS, for federal and state reporting purposes, and timely action by CAOs affecting clients' eligibility for benefits or continued participation in EARN. The EARN service provider must complete data entry into CWDS as follows:

- Hours of participation can be data entered into CWDS based on the attendance form. Data entry can then be reconciled when the verification is received.

- For all activities except AC 31 and AC 33: activity and hours must be entered and, if needed, updated by the 15th of the month after the month of participation; e.g., July hours must be entered by August 15.
- For AC 31 and AC 33: activity must be entered by the 15th of the month after the month of participation. Attendance hours must be entered/updated by the last day of the month, two months after the month of participation; e.g., July hours must be entered by September 30. The activity end date must be entered by the last day of the month after the month of participation.

Any data not entered by the data entry deadlines will not count toward the performance outcomes.

Mathematical rounding will be utilized to round clients' hours: round down to the next whole hour if the fraction is .49 or below and round up to the next whole hour if the fraction is .5 or above. Mathematical rounding will be instituted at the end of each week per activity.

EARN service providers must promptly and correctly data enter information into CWDS. It is essential to capture all client activity hours toward meeting federally mandated TANF participation requirements.

All information entered into CWDS must match the information on the EARN attendance sheets (See Attachment A). All service providers must develop a data reconciliation process to ensure that all information in CWDS is accurate.

EARN service providers are expected to maintain a data accuracy and timeliness rate of at least 85%.

> **NOTE:** EARN service providers may refer to the CWDS manual for further information on the operation of CWDS. Data entry questions can be directed to the CWDS Help Desk at 1-866-236-6297 or RA-CWDS@pa.gov.

Monthly Reporting

Contractors will be expected to complete Monthly Contractor Performance Reports for all measures which cannot be captured through the CWDS system. Special detail is given to credentialing, counseling services provided, and measures stated by the contractor that may have been covered in the Program Implementation Plan (PIP). Data staff in your programs may need to develop tools or other means to collect this information. Some information may be simple counts, but other information may be able to be validated via the CWDS system. Please see Attachment F for details on the fields required, due date, and submission expectations.

EARN Case Record Requirements

The EARN service provider will create a confidential EARN Case Record. The EARN Case Record must be kept in a secure location with limited accessibility. Staff not associated with the EARN case may not have access to the EARN Case Record or narrative.

The EARN service provider will document the following in the EARN Case Record narrative:

- date, time, and location of all EARN related contacts
- purpose and outcome of all EARN related contacts
- any changes in the client's conditions or circumstances
- solutions offered and the client's responses
- services and supports requested or provided
- pertinent information received from the CAO
- any other relevant information

> **NOTE:** The EARN service providers are required to document their narratives using the CWDS Create Case Progress Notes screen. Additionally, it is suggested to identify case notes with specific topics, for example "Incentives."

The following documents should be maintained in the client's file and must be available for upload on DocuShare for validation purposes:

- AMR
- Service Plan/IEP
- Attendance Sheets, including make-up plans (See Attachment A for the EARN Attendance sheet)
- Job Search Logs
- Excused Absence Logs
- Release of Information Form (See Attachment G)
- Employment Verification Form (EVF) (See Attachment E)
- Verification of Retention
- Other Relevant Information

Documents must be retained for a period of six years.

Internal Data Reconciliation

The EARN program is evaluated based on CIS and CWDS information; therefore, it is imperative that the contractor schedule time at least once a month to reconcile the data found throughout all systems and case files used by the contractor to ensure the accuracy of the data used to track participants.

At a minimum, the following must be consistent in all the data systems.	Critical data that must match across all reporting systems.
Client Information System	Project begin and end dates
Commonwealth Workforce Development System	Activities, including begin and end dates
Job Placement and Retention Report	Time and attendance information.
Case Records	Employment information (employer, job start and end dates, medical information, wages, etc.)

The CWDS Enrollment, Closings and other reports must be accessed and utilized for reconciliation purposes. Future CWDS enhancements will include reports that can be used to compare contractor's performance against program standards.

SECTION 6 – TERMINATIONS

Project Termination

Project termination codes reflect program outcomes, including whether or not the client secured employment. The EARN service provider must include the reason for termination in the narrative of the client's case record.

Termination codes 3, 5, and 7 must be data entered within three business days of the date of the decision to terminate. For clients terminated with employment/retention codes 1 and 8, the termination date may date back to the final day worked which completes the 12-month retention period as verified by paystubs.

Programs must conduct outreach efforts for clients who miss three consecutive scheduled days of program activity. If a client does not respond to the outreach efforts and does not report on the fourth day the client must be terminated from the program. Clients who report at any time on the fourth day should not be terminated.

The CAO and contractor members of the DST can decide jointly to terminate an underperforming client from the program even if attendance does not warrant it under the three-day absence rule. Alternatively, if it is determined by the CAO that a client who missed three or more consecutive scheduled days or fell short of their required hours would benefit from remaining in the program, and there is a plan of action with the client for them to be re-engaged immediately, the client may be retained in the program. The plan of action should include using excused and/or unexcused absences and make-up time to remain within a reasonable level of compliance with their AMR. This should be noted in the contractor's case narrative and the decision documented by the CAO. In no circumstance should the contractor make the decision to retain the client without approval from the CAO and contact with the client.

When a client moves out of their county of residence, the EARN provider must terminate the project.

Project Termination Codes

Termination Type	Code	Clarifications
Part-time Employment. Client obtains employment for 20 to 29 hours per week as validated by CWDS reports.	1	The termination date may date back to the final day worked which completes 12-month retention period.
Full-time Employment. Client obtains employment for 30 hours or more per week as validated by CWDS reports.	8	
Withdraws or Terminates Without Good Cause. Client withdraws from the program without good cause or fails to comply with the contractor's absence policies. This includes clients who are terminated from the program for missing three consecutive scheduled days of activity and who do not report on the fourth day. It also includes participants who have been placed but terminated without meeting retention requirements.	3	Good cause is determined by the CAO after the client is terminated. Use code 3 unless the CAO determines **at the time of termination** that good cause will be granted, at which time code 7 is appropriate.
Obtains SSI/RSDI. Client is approved for SSI/RSDI.	J	
Transfers to KEYS or ELECT. Client transfers to KEYS or ELECT program to fulfill their hourly participation requirements.	X	Provider must facilitate the referral/transfer to the KEYS or ELECT program. The KEYS/ELECT program will request an updated AMR and referral from the CAO using the reverse referral process prior to termination from the EARN program.
Completion of planned AMR activities with no employment. Client has successfully completed the EARN Program and is transferred back to the CAO to be referred to another appropriate E&T program.	5	
Other. Client's reason for termination does not fit other termination codes listed here.	7	

SECTION 7 – PERFORMANCE REQUIREMENTS & STANDARDS

Performance Standards/Goals

Certain performance standards will be used to assess the effectiveness of the service provider. Performance standards for EARN PY 2020 – 2021 are outlined in the chart below. If the service provider does not meet the threshold/goal for any of the categories listed, a corrective action plan must be submitted.

Performance Standards

Category	Description	Threshold/Goal
Assessment	A comprehensive household assessment must be conducted and completed within 7 business days of a participant's enrollment.	85% of all enrolled participants.
IEP	A detailed IEP must be documented and include plans to address participant challenges (barriers) and agreed upon plans for resolution within 14 business days after the assessment is completed.	85% of all enrolled participants.
Licensed Counselor or Social Worker	A network of professionals must be established so that eligible participants have an introductory meeting and are able to meet with an appropriate professional at least once a month.	80% of all enrolled participants will have an introductory 1-on-1 meeting with staff within 14 business days from the participant's program enrollment.
Secondary Equivalency and Credentialing (including referrals to outside programs)	Coordination of educational activities through referrals to ELECT service providers and the KEYS program --OR-- For participants in a credentialing or secondary equivalency program, a participant must receive a diploma or certification that will provide the participant with an industry-recognized certificate or certification and marketable skill directly related to their employment goals listed on their AMR and IEP.	50% of all participants entering an activity that can result in a transfer or credential are successful.

Category	Description	Threshold/Goal
Placement	Placement of participants in employment where participant is meeting 20 hours per week (80 hours per month) in Unsubsidized Employment and is paid at least two dollars above the higher of the federal or state minimum wage as of July 1 of the program year. Placement can be met at any time once employment begins until the end of the retention period.	70% of participants with employment must meet placement criteria.
Retention	Retention begins when an individual obtains unsubsidized employment (Activity 33) and is placed in CWDS Extended Hold indicating the initial TANF services have ended. The program is to continue to serve the individual during the retention period, up to twelve months. A participant may meet the retention goal up to two times, at six (6) months and twelve (12) months after the project ends.	50% of participants who are placed in employment.
Earned Income	Applies to participants who have achieved Placement. At the conclusion of the 12-month retention period, the participant has increased their earned income.	75% of participants who have achieved Placement benchmark.

Monitoring

DHS will monitor EARN service providers at least annually but may conduct more frequent monitoring at its discretion. Monitoring will include a review of data systems, monthly case record reviews as well as site visits to review program compliance. DHS will also conduct training and information sessions, along with technical assistance for the service providers as needed.

EARN service providers that do not meet minimum outcomes and expectations will be asked to submit a corrective action plan addressing the deficiencies within 14 business days of notification of the deficiencies. Regular progress reports on actions to correct the deficiencies will also be required.

EARN service providers that have multiple areas of deficiencies or those who do not show progress as a result of the corrective action plans are required to participate in meetings to plan and review progress.

See Attachment H for detailed information on performance validation.

Program Implementation Plan

At the beginning of each program year, every provider will be required to submit a Program Implementation Plan (PIP) to BEP (see Attachment I). This plan will be used by the providers to explain how they intend to operate and design programming that aligns with the requirements outlined in the Statement of Work. The PIP must be submitted to BEP within 45 days of the program year start.

The PIP will be used in conjunction with the monthly reports to evaluate program effectiveness and may be referenced throughout the year as part of program monitoring, technical assistance and overall program performance.

SECTION 8 – PROGRAM OVERSIGHT

Americans with Disabilities Act of 1990 (ADA)

The ADA prohibits discrimination and ensures equal opportunity for persons with disabilities in employment, State and local government services, public accommodations, commercial facilities, and transportation. It also mandates the establishment of TDD/telephone relay services. All contractors must comply with the ADA.

Limited English Proficiency (LEP)

Each EARN service provider will provide or arrange for the provision of adequate interpretive services for all EARN services and activities.

Confidentiality

All clients must be assured that the personal data they provide will be confidential.

The EARN service provider will keep client information obtained from the client or other sources confidential. It will only be released upon the client's written approval, obtained on DHS approved Authorization for Release of Information Forms (See Attachment G), and only for the purpose specified by the client.

 Per the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule (45 CFR Parts 160 and 164) all personal health information should be retained for a period of six years. All EARN information should be kept for a period of six years, after which the information should be shredded.

Client Incentives

Client Incentives are positive reinforcements to reward client participation. Incentives are based on the client meeting an objective or standard. For example, a gift card is an allowable incentive per ACF as long as the expenditure can be justified as meeting one or more of the statutory purposes of the TANF program. Cash awards, bank accounts, stocks/bonds are not permissible as they could potentially make a TANF participant ineligible due to resource limits.

The EARN service provider must maintain a list of all incentives issued that includes at a minimum the following information: amount and type of incentive issued, name of individual receiving incentive, date issued and reason for issuance of incentive. All incentives given to a participant should also be recorded in the CWDS case narrative. The issuances of client incentives are subject to monitoring.

Supportive Services

EARN service providers will not issue special allowances to clients. Clients may continue to be eligible for CAO-issued special allowances. The EARN provider may assist clients in completing and submitting the SPAL Request Form (PA 1883), along with any supporting documentation, to the CAO. This form and documentation may be submitted by secure email or fax or via CWDS. (If submitting through CWDS, a SPAL Verification form must still be submitted separately to the CAO).

The CAO will consider multiple factors when determining eligibility for a SPAL, including, but not limited to, those listed below.

The item or service must:

1. Be required for participation in work or an approved activity;
2. Be the least costly and most practical item or service that will meet the need;
3. Not be available from another source or at no cost to the client; and
4. Not be already owned by or previously paid for by participant

SPALs will not be issued by the CAO if the requested item or service is available at no cost to the participant from another source.

If the CAO finds the client eligible for the SPAL, the client is to provide a receipt showing that the SPAL was used for the intended purpose within 14 calendar days. Failure to document how the SPAL was used within the 14-day time frame, or documentation showing the SPAL was used inappropriately, may result in an overpayment for the client.

See Attachment I for the SPAL Request Form and Attachment J for the SPAL Desk Guide used by the CAOs.

Direct Service Team (DST) Meetings

DST Meetings provide an opportunity for CAOs and case managers from contracted employment and training programs to meet, at least monthly, to problem solve for individual clients and reconcile records.

The DST must consist of at least a representative from the CAO and a program operator from the EARN provider. DHS has made a commitment to reforming E&T programming to better suit the varied needs, challenges, and situations that our participants represent. As such, one initiative is to foster better communication between all area contracted E&T providers and the CAO.

Contracted E&T providers should establish a meeting time and location to engage the CAO via DST meetings no less than once a month; in-person meetings are preferred but telephone meetings are also permissible.

Contracted E&T providers will utilize the DST meetings to reconcile records, develop makeup plans, discuss participant issues, and collaborate toward resolutions with meaningful impact.

Local Management Committee (LMC) Meetings

This meeting is responsible for the coordination of operations and services provided in the local areas to public assistance recipients. All local E&T program providers are required to attend.

See Attachment L for detailed LMC information.

Contacts

Questions regarding EARN program policy should be addressed to RA-BOPEARNPOLICY@PA.GOV.

Questions regarding EARN program validation requirements should be addressed to RA-BPE-DPI@PA.GOV.

Questions regarding EARN program data entry into CWDS should be addressed to the CWDS Help Desk at 1-866-236-6297 or RA-CWDS@pa.gov

ATTACHMENTS

ATTACHMENT A EARN Attendance Sheet

A (EARN attendance
    sheet).pdf

ATTACHMENT B PA 590

B (PA 590).pdf

ATTACHMENT C Community Service Desk Guide

C (Community
Service Desk Guide).

ATTACHMENT D PA 1694

D (PA 1694).pdf

ATTACHMENT E EVF

E (EVF).pdf

ATTACHMENT F Monthly Contractor Performance Report

F Monthly
Contractor Performa

ATTACHMENT G Confidential Release of Info

G (Confidential
Release of Info).pdf

ATTACHMENT H Validation

H (Validation).pdf

ATTACHMENT I Program Implementation Plan

I PIP.docx

ATTACHMENT J SPAL Request Form

J SPAL Request
Form PA 1883.pdf

ATTACHMENT K SPAL Desk Guide - CAO

K SPAL Desk
Guide.pdf

ATTACHMENT L LMC Operations

L LMC.pdf

ATTACHMENT M Education Policy

Education Policy
OPERATIONS MEMC