

# **EARN**

**EMPLOYMENT ADVANCEMENT AND RETENTION NETWORK**



**PROGRAM POLICY AND PROCEDURES MANUAL**

**DEPARTMENT OF HUMAN SERVICES  
PROGRAM YEAR 2018 – 2019**

**APPENDIX A OF THE STATEMENT OF WORK**

Table of Contents

SECTION 1 – INTRODUCTION .....	4
Program Overview.....	4
Eligibility Criteria .....	4
SECTION 2 – REFERRALS.....	5
Program Referrals .....	5
Project Referral Rejection Codes.....	5
SECTION 3 - ENROLLMENTS .....	7
Initial Program Enrollment .....	7
Service Plans.....	8
Determining Hours of Participation .....	8
Activity Compliance Rate (ACR).....	9
SECTION 4 – Employment and Training (E&T) ACTIVITIES .....	11
E&T Activity Codes and Descriptions.....	11
Self-Initiated Students - <b>NEW</b> .....	18
Activity Closing Codes .....	19
SECTION 5 – PROGRAM ATTENDANCE & RECORD KEEPING .....	20
Attendance Documentation .....	20
Absences .....	23
<i>Excused Absences</i> .....	23
Data Entry.....	24
EARN Case Record Requirements .....	26
Internal Data Reconciliation .....	27
SECTION 6 – TERMINATIONS.....	29
Project Termination .....	29
Project Termination Codes.....	30
SECTION 7 – PERFORMANCE REQUIREMENTS & STANDARDS.....	31
Performance Standards/Goals .....	31
Monitoring .....	33
SECTION 8 – PROGRAM OVERSIGHT .....	34
Americans with Disabilities Act of 1990 (ADA).....	34
Limited English Proficiency (LEP).....	34
Confidentiality .....	34
Client Incentives .....	34
Supportive Services - <b>UPDATED</b> .....	35
Referrals to PA WorkWear (PAWW) - <b>NEW</b> .....	35
Local Management Committee (LMC) Meetings .....	36
Direct Service Team (DST) Meetings .....	36
Contacts .....	36



ATTACHMENTS.....37

- ATTACHMENT A EARN Attendance Sheet ..... 37
- ATTACHMENT B Community Service Desk Guide..... 37
- ATTACHMENT C PA 1694 ..... 37
- ATTACHMENT D PA 590 ..... 37
- ATTACHMENT E Confidential Release of Info..... 37
- ATTACHMENT F EVF ..... 37
- ATTACHMENT G Validation ..... 37
- ATTACHMENT H LMC Operations ..... 38
- ATTACHMENT I SPAL Request Form..... 38
- ATTACHMENT J SPAL Desk Guide - CAO..... 38
- ATTACHMENT K PAWW Referral Form ..... 38
- ATTACHMENT L PAWW Contact List ..... 38

## **SECTION 1 – INTRODUCTION**

### *Program Overview*

Employment Advancement and Retention Network (EARN) is designed to assist clients in their transition from public benefit receipt, to the workforce. The focus of all programming is to move the clients towards self-sufficiency, eliminating their need for public assistance. As the primary focus of the program is to move clients into the workforce, the program will provide activities that aid in the pursuit of that goal.

### *Eligibility Criteria*

County assistance office (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), excluded or declining Diversion, may be referred to the EARN contractor. The hours of participation are determined by the household composition for TANF.

### *Two- Generation Approach*

A Two-Generation approach applies policies and procedures which provide opportunities that meet the needs of both the parents and children in a family unit. This type of approach seeks to eliminate generational poverty. DHS strongly encourages contractors to apply this approach to their program.

## SECTION 2 – REFERRALS

### Program Referrals

In order to increase the likelihood of initial attendance in the program, the EARN program is required to make contact with the client prior to the appointment date. Programs are required to develop a plan for referral outreach and send it to the Bureau of Employment Programs (BEP).

Explaining the program, ensuring that the individual knows where and when to report and assisting in the removal of potential childcare and transportation problems will lead to a higher referral to enrollment rate, and continued participation.

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

EARN programs may set their orientation start time; however, a client must be given opportunity to report to the program and should not be referral rejected if 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 days of the referral date.

**NOTE:** The referral date is not included in this count.

### Project Referral Rejection Codes

If the client does not show for orientation or refuses to cooperate at the orientation, the EARN service provider will conduct outreach to the client in an attempt to enroll and engage the client.

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 Commonwealth Workforce Development System (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

**NOTE:** All Code 5 rejections must be narrated in CWDS and are subject to DHS review.

EARN providers will use Direct Service Team (DST) meetings as an opportunity to discuss referral rejections.



## **SECTION 3 - ENROLLMENTS**

### **Initial Program Enrollment**

The EARN service provider must enroll the client in the program the date he or she reports to or agrees to participate via phone or other electronic means. Data entry of the client's enrollment in CWDS must be completed within three working days of the date of enrollment.

**NOTE:** The date the client reports to the EARN center is not included in this count.

To enroll a client (Project Code D or NC for Philadelphia), the EARN service provider will enter a start 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** circumstances is a client to have an open project with no open activity code.

At the time a client is enrolled, the EARN service provider will conduct a case review to become familiar with the client's background and situation. The EARN service provider will review the information below:

- Agreement of Mutual Responsibility (AMR) with particular attention to:
  - Education level.
  - Age of youngest child.
  - Identified barriers.
- Child care and transportation arrangements.
- Medical information, including physician, clinic, and hospital records (if applicable).
- Work history.
- Family and social history focusing on household composition.
- Information regarding the client's current and past participation in Employment & Training (E&T) programs.
- Educational activities and the outcome of those experiences.
- Information regarding services the participant is receiving from other agencies/providers.
- Case narratives (if applicable).
- Any other pertinent information.

Upon reviewing all pertinent information from the client, the EARN will make an assessment to determine what is the best path towards self-sufficiency for the client. If any barriers exist, the EARN will work with the client to eliminate the barrier.

During the client's initial enrollment period, the EARN service provider will review the following:

- EARN policies and client requirements, including hourly requirements.



- EARN service provider's responsibilities, including their role in developing and monitoring the client's active service plan and progress throughout the program.
- Authorization for Release of Information.

## Service Plans

A Service Plan will be developed by the EARN service provider and the client to address the needs, employment, and training goals of the client and his or her household. It will contain all recommended services, activities and supports, and will address all barriers and include all barriers listed on the AMR. The plan must be updated as the client's activities change.

At a minimum an acceptable service plan must:

- ✓ indicate client's specific goals.
- ✓ identify client's barriers.
- ✓ consist of an action plan that reflects the client's goals and barriers.
- ✓ show the client's progress throughout the program (including specific activities, activity begin/end dates, and expected hours to participate).
- ✓ mirror the CWDS Service Record screens.

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

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

**NOTE:** The EARN service provider is to create Service Plans in CWDS using the Create Plan screen.

## Determining Hours of Participation

The number of core and non-core 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 as determined by the CAO caseworker and recorded on the AMR.

### Participation Hours

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

**Non-Core 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.



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

HOUSEHOLD COMPOSITION	MINIMUM HOURS per WEEK
<b>SINGLE PARENT</b>	
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
<b>TWO-PARENT</b>	
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 child care	35 hours combined. One parent must participate in at least 30 hours in a core activity
receiving federally-funded child care	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 non-core activities
one parent DS, NS or DF not receiving federally-funded child care	One parent must participate in 35 hours, at least 30 hours in a core activity
one parent DS, NS or DF receiving federally-funded child care	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 child care 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 child care does not affect the number of participation hours

### Activity Compliance Rate (ACR)

The CWDS ACR report displays the degree to which clients enrolled with a specified provider are engaged and participating in activities that contribute toward achievement of the statewide work participation rate (WPR).

The Administration for Children and Families (ACF) requires that each state meet a WPR of 50 percent. The WPR is measured by how many of the TANF cases required to meet participation requirements per federal regulations are doing so. States face significant financial penalties for failure to comply with the required WPR. The EARN contractors, who serve a large number of Pennsylvania's mandatory participant population must comply with work participation and activity compliance requirements in order to ensure the state meets its goal.

The CWDS logic can sort the client data and comparing it to the parameters necessary for achievement of the ACR. Service providers with an ACR under 60% will be provided technical assistance by DHS to improve their ACR.

When a client's TANF closes due to income, the provider should be aware that the client remains part of the WPR Calculation through the duration of his/her receipt of transitional cash assistance (TCA) from the CAO. The client is expected to meet the same number of hours that they were required to meet under the TANF rules until the end of the TCA period. Upon the end of the TCA period, the client is eligible to remain enrolled, and may be included in the retention calculation.

TANF Monthly Sample: The monthly sample is the selection of cases that are submitted to the federal government as a part of the federal TANF Data Report. This report is used to determine the commonwealth's WPR.

There is no way to know for certain which cases will be selected as part of the monthly sample. For this reason, it is extremely important to ensure that each participant achieves the required core and non-core hourly blend for each week during each month.

## **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 in 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 Service Plan 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 utilized 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 non-core for each activity, as well as durational time limits or important notes included as applicable.

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.

**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.

E&T ACTIVITY CODES AND DESCRIPTION					
Activity	Code	Description	Core/ Non- Core	Durational Limits	Comments
Providing child care 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.	Clock stops for duration activity is open. See self-initiated student section below. Termination with "code" 9 – completion, will result in a credentialing payment.
Enrolled in any non-KEYS Post-Secondary Education	16	Educational activity offered by an accredited non-KEYS post-secondary institution	Core	12 months	Clock stops for duration activity is open. See self-initiated student section below. Termination with "code" 9 – completion, will result in a credentialing payment.
General Equivalency Diploma(GED)/ High School - Preparation for GED	18	Educational activity offered by an accredited high school or GED provider.	Core	None	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. NOTE: Core activity if individual is under age 22. Non-core activity if individual is age 22 or older.

E&T ACTIVITY CODES AND DESCRIPTION					
Activity	Code	Description	Core/ Non- Core	Durational Limits	Comments
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 AMIR.  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 CORE requirement.  Community service is a beneficial activity available for clients who have a negligible work history or who live in communities where there is minimal employment.
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 payment.

E&T ACTIVITY CODES AND DESCRIPTION					
Activity	Code	Description	Core/ Non- Core	Durational Limits	Comments
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 payment.
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. DHS has chosen to allow clients to exceed the federal 12-month lifetime limit on this activity in the case where a client is enrolled in the activity to obtain a credential/ certification under the standards for the PY 17/18 credentialing performance payment. In such circumstances, these activity hours may be counted towards a client's core requirement.  -TANF clients may be enrolled in credentialing/certification programs.	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 payment.

<b>E&amp;T ACTIVITY CODES AND DESCRIPTION</b>					
Activity	Code	Description	Core/ Non- Core	Durational Limits	Comments
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 six 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 payment.
Work Study	31	Work Study is 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.
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	
Job Search/Prep Training and ongoing job search	42	Job search 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.	Core	TANF clients cannot participate in job search for more than four consecutive weeks. After a four-week consecutive period of job search, the client must be enrolled in another activity for at least one week. For this purpose, one hour of job search in a week counts as a week of job search.  Clients may also not participate in job search for more than 12 weeks in a rolling 12-month period.  For the 12-week limit, one week of job search 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. -One week of job search for all other work-eligible individuals is defined as 30 hours for a total limit of 360 hours.	

<b>E&amp;T ACTIVITY CODES AND DESCRIPTION</b>					
<b>Activity</b>	<b>Code</b>	<b>Description</b>	<b>Core/ Non- Core</b>	<b>Durational Limits</b>	<b>Comments</b>
Vocation-Specific Work Experience (VWE)	51	VWE is DHS'-funded 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.	Non- Core	None	
Adult Basic Education/Literacy (ABE)	12	ABE is designed to increase literacy and computational levels consistent with employment goals.	Non- Core	None	The educational activity must be embedded with other skills training activities that have been determined necessary in order to meet the goals set on the participant's Service Plan.




E&T ACTIVITY CODES AND DESCRIPTION					
Activity	Code	Description	Core/ Non- Core	Durational Limits	Comments
GED/ High School - Preparation for GED	18	Educational activity offered by an accredited high school or GED provider.	Non- Core	None	As a non-core activity, only actual attendance hours may be counted towards participation. NOTE: Non-core activity if individual is age 22 or older. Core activity if individual is under age 22.
Non-Core 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.	Non- Core	None	This code is for clients without a high school diploma or GED.
Non-Core Vocational education for a client with a high school diploma or GED	35	This code is for clients with a high school diploma or GED. Vocational Education provides training in specific occupational skills needed in the current job market.	Non- Core	None	
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.	Non- Core	None	



**Self-Initiated Students - NEW**

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. The 180-day job placement clock STOPS while the participant is in student status, regardless of KEYS Expansion status.

Students	Activity Code	Sub Project Code 1	Sub Project Code 2	Core Y/N	Durational Limits	Comments
KEYS Expansion Students (Enrolled in a KEYS approved educational institution)	14	45: Career & Tech Students	48: Students who are in months 13 to 24 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:   KEYS Expansion Institutions.pdf
		46: State-Owned University Students	49: Students who are in month 25 or over of voc-ed time			
Non-KEYS Students	16	50	n/a	Y	12 months	The 16 is designed for those clients referred to the EARN program already self-initiated in a non-KEYS post-secondary education.
	24		n/a		12 months+ for participants obtaining a credential/ certification under the standards for the PY18/19 credentialing performance payment.	

**Study Time Policy**

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. *AC24: Additional activities may be embedded within the curriculum and include ABE, ESL, and GED.*

### Activity Closing Codes

The EARN service provider is required to data enter an appropriate activity closing code when ending the client's participation in activity.

The code used to terminate the activity will indicate the completion of the activity and must be entered before terminating the project on 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 (Activity 24 only)

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 ACR requirements.

## **SECTION 5 – PROGRAM ATTENDANCE & RECORD KEEPING**

### *Attendance Documentation*

#### Employment

Employment hours must be verified through paystubs, documentation from the employer, DHS approved Employment Verification Form (EVF) or the Work Number (or similar service). Documentation must include at least monthly income verification to determine if the client is meeting the performance standards for placement and retention. Hours entered must be verified and cannot be projected based on a single pay stub.

#### All Other Activities

Participation hours in all other activities (unpaid work activities) 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) (**Attachment D**), 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.

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 (Attachments **B**, **C** and **D**). The maximum number of allowable hours that a client may participate in community service should be documented by the CAO. Please reference comments under Community Service under Section 3, Activity Codes.

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.
  - a. Ongoing contact is defined as weekly contact with the student.
  - b. Adequate Evidence of satisfactory progress could include:
    - i. Electronic communication with the instructor or college personnel to verify that the student is attending class or completing required assignments on a weekly basis.
    - ii. Weekly progress reports from the college.
    - iii. Documentation of expected assignments and confirmation of completion and submission of assignments on a weekly basis.
  - c. 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 obtained and retained in the clients 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.

#### Vocational Education provided by the EARN Contractor:

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 career fields within the Workforce Investment Area.

Non-credentialing: Vocational education activities conducted in-house without the intent of credentialing must be accompanied by a curriculum that has been submitted to and accepted by the Bureau of Employment (BEP) prior to implementation. If changes are made to the approved curriculum, the updated curriculum must be re-submitted for endorsement to BEP 10 days prior to implementation. Curriculums should be submitted to the resource account, [RA-BOPEARNPOLICY@PA.GOV](mailto:RA-BOPEARNPOLICY@PA.GOV).

Credentialing: Vocational education activities which will lead to receipt of a diploma or certificate that will provide the client with a valuable and marketable skill directly related to



employment must be submitted, approved and accepted by the BEP prior to implementation. Any certification program package submitted must include the following components:

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 towards 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, you would list all the subjects you will cover 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 re-submitted for endorsement to BEP 10 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](mailto:RA-BOPEARNPOLICY@PA.GOV).

#### Vocational Education not provided by the EARN Contractor (Credentialing and Non-Credentialing)

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 on-line 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 education 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.ed.state.pa.us/Screens/wfSearchEntity.aspx>

Businesses licensed with DOS can be searched at the following link:

<https://www.corporations.pa.gov/Search/CorpSearch>

On-line colleges approved by the US Department of Education can be searched at the following link:

<http://ope.ed.gov/accreditation/Search.aspx>

## Absences

### Excused Absences

Clients engaged in unpaid work activities may be given participation credit for excused absences.

**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.**

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. For 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, she may be credited with three hours of excused time.

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 child care.
- 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.

An excused absence tracking log should be completed and kept up to date.

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 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.

### 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 service providers 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, 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 AC 31 and AC33 – activity and hours must be entered and, if needed, updated by the 15<sup>th</sup> of the month after the month of participation; e.g., July hours must be entered by August 15.
- For AC31 and AC33 – the activity must be entered by the 15th of the month following the month of participation. Attendance hours must be entered/updated by the last day of the month, 2 months after the month of participation. The Activity End Date must be entered by the last day of the month, 1 month after the month of participation

Any data not entered by the data entry deadlines will not count towards the performance-based payments or 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 towards meeting federally-mandated TANF participation requirements.

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

If the client's TANF closes for any reason, the system will move the client from the Enrolled list to the 45-day hold list in CWDS. If the client is in retention and volunteers to remain in EARN, the EARN service provider needs to update the Case status into the Extended Hold Status and should continue to enter hours for the client under all appropriate activity codes. If no action is taken to update the Case status the project will system close on day 45.



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

**NOTE:** TANF closing may impact the client's eligibility for Special Allowances and should be discussed with the CAO.

**NOTE:** EARN service providers may refer to the CWDS manual for further information on the operation of the CWDS. Data entry questions can be directed to the CWDS helpdesk at 1-866-236-6297, or resource account [RA-CWDS@pa.gov](mailto:RA-CWDS@pa.gov)

### **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
- 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 E** for the EARN Release of Information Form
- Employment Verification Form (EVF). See **Attachment** for the EVF.
- Verification of Retention
- Other Relevant Information

Documents must be retained for a period of seven 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.



<b>At a minimum, the following must be consistent in all the data systems.</b>
Client Information System
Commonwealth Workforce Development System
Job Placement and Retention Report
Case Records

<b>Critical data that must match across all reporting systems.</b>
Project begin and end dates
Activities, including begin and end dates
Time and attendance information. 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 working days of the date of 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 six-month retention period as verified by paystubs.

Programs must conduct outreach efforts for clients that 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 him/her 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 his or her county of residence, the EARN provider must terminate the project.



**Project Termination Codes**

Termination Type	Code	Clarifications
<p><b>Part-time Employment.</b> Client obtains employment for 20 to 29 hours per week as validated by CWDS reports.</p>	1	<p>The termination date may date back to the final day worked which completes six-month retention period as verified by paystubs.</p>
<p><b>Full-time Employment.</b> Client obtains employment for 30 hours or more per week as validated by CWDS reports.</p>	8	
<p><b>Withdraws or Terminates Without Good Cause.</b> Clients who withdraw from the program without good cause, as well as clients who fail to comply with the contractor's absence policies.</p> <p>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.</p> <p>It also includes participants who have been placed but terminated without meeting retention requirements.</p>	3	<p>Good cause is determined by the CAO after the client is terminated. Use code 3 unless the CAO determines <b>at the time of termination</b> that good cause will be granted, at which time code 7 is appropriate.</p>
<p><b>Completion of plan AMR activities with no employment.</b></p>	5	<p>As the EARN program's purpose is to transition clients to the workforce, this would normally not be an appropriate code for use by EARN contractors. The contractor should contact the BOP EARN resource account, <a href="mailto:RA-BOPEARNPOLICY@PA.GOV">RA-BOPEARNPOLICY@PA.GOV</a> for clarification before using this code.</p>
<p><b>Other.</b> Client's reason for termination does not fit other termination codes listed here.</p>	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 2018 – 2019 are successful attainment of job placement, job retention and credentialing.

All performance standards will be calculated from reports generated by CWDS and will be verified for accuracy by DHS.

Each of the five performance standards will be paid based on a per individual basis. For each client meeting the standard detailed in the following table, the grantee will be eligible, upon verification and available budget, for a payment based on the client meeting that particular goal.

**DHS requires that all performance funds awarded to EARN providers must be reinvested into the EARN program.**



<b>PERFORMANCE REQUIREMENTS AND STANDARDS</b>			
<b>Performance Goal</b>	<b>Definition</b>	<b>GOAL</b>	<b>Payment Amount</b>
<b>Placement Tier 1</b>	<p>Clients must attain Unsubsidized Employment (AC 33), working a minimum of 80 hours in a four- consecutive week period. The four-week period must begin within the 180 days of the enrollment date.</p> <p>The 180-day time limit for placing a client into employment can be extended if the client enrolls in an educational or training program leading to a certificate or diploma by the 90th day of enrollment in EARN. Upon entry of activity code 22, 23, 24, and 26 the 180-day time frame for job placement will be extended for the time the client is enrolled in the program up to 180 additional days.</p> <p>The 180-day time limit for placing a client into employment can be extended if the client enrolls in a longer term educational or training program leading to a certificate or diploma. Upon entry of activity code 14 or 16 the 180-day time frame for job placement will be extended for the time the client is enrolled in the program.</p>	<p>Payment based on number of individual clients meeting standard</p>	<p><b>\$900</b></p>
<b>Placement Tier 2</b>	<p>Must meet all of the standards for Tier 1 placement.</p> <p>Additionally, client is making at least \$10/hr. at any time during the current EARN enrollment.</p>	<p>Payment based on number of individual clients meeting standard</p>	<p><b>\$300</b></p> <p>Total for meeting Tier 1 and Tier 2 = \$1,200</p>
<b>Placement Tier 3</b>	<p>Must meet all of the standards for Tier 1 placement.</p> <p>Additionally, client must have earnings that result in the closure of the TANF budget. <i>Note: The client need not have met Tier 2 to meet Tier 3.</i></p>	<p>Payment based on number of individual clients meeting standard</p>	<p><b>\$500 (if Tier 2 is also met)</b> <b>\$800 (if Tier 2 is not met)</b></p> <p>Total for meeting Tier 1, 2 &amp; 3 = \$1,700 Tier 1 &amp; Tier 3 = \$1,700</p>





<b>PERFORMANCE REQUIREMENTS AND STANDARDS (cont.)</b>			
<b>Definition</b>	<b>GOAL</b>	<b>Payment Amount</b>	
<b>Retention</b>	After a client meets the Placement Tier 1 goal, the client must retain Unsubsidized Employment (AC 33) of at least 80 hours in any given calendar month for up to six consecutive months following the placement month. A client may meet the retention goal up to six times in the six months immediately following the placement month. A client may not have hours counted in the same calendar month for both placement and retention.	Payment based on number of individual clients meeting standard	<b>Level 1 (one month): \$100</b> <b>Level 2 (two months): \$300</b> <b>Level 3 (three months): \$500</b> <b>Level 4 (four months): \$700</b> <b>Level 5 (five months): \$900</b> <b>Level 6 (six months): \$1,100</b> <b>Total : \$3,600</b>
<b>Credentialing</b>	In the credentialing component, a client must receive a diploma or certification that will provide the client with a valuable and marketable skill directly related to employment. Limited to one credentialing payment per client per enrollment. AC 14, 16, 22, 23, 24, and 26 counts towards a Credential payment if they are closed with a Term Code "C" for AC24 or code "9" for the other activities.	Payment based on number of individual clients meeting standard	<b>\$500</b>

**Monitoring**

DHS will monitor the EARN service providers through 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 with the service providers.

EARN service providers that do not meet minimum outcomes and expectations will be asked to submit a corrective action plan addressing the deficiencies upon 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 G** for detailed information on performance validation.

## **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 (Attachment E), and only for the purpose specified by the client.

The Health Insurance Portability and Accountability Act (HIPAA), the privacy regulations at 45 CFR, Sections 160-504 and 164.530 indicate that all personal health information should be retained for a period of seven years. All EARN information should be kept for a period of seven years, after which the information should be shredded.

### **Client Incentives**

Client Incentives are positive reinforcements to reward client participation. Incentives are based on client meeting an objective or standard.

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 - UPDATED**

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 (PA1883), 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 the multiple factors below when determining eligibility for a SPAL. Including, but not limited to the following 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 available from another source or at no cost to the client; and
4. Not already owned by or previously paid for by participant

Additionally, SPALs should not be used to replace other resources that are available to the participant through another state or federal government entitlement. For example, the eligibility of a post-secondary education participant for a Federal Pell Grant should be explored prior to authorizing a SPAL to pay for textbooks. Federally-subsidized loans are not considered a resource for purposes of this paragraph.

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 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.

### **Referrals to PA WorkWear (PAWW) - NEW**

PA WorkWear (PAWW) provides professional attire for job interviews and specific clothing necessary for employment or training in lieu of a special allowance for clothing from the County Assistance Office (CAO). DHS TANF clients are eligible for a referral to PAWW if they have a need for clothing. This could include an interview outfit for job search or specific clothing for work if required by the employer. Need for clothing is determined by the CAO or E&T contractor

The PAWW Referral Process is as follows:

1. The CAO or E&T contractor determines if the client has a need for clothing.
2. The PAWW provider, CAO and E&T contractors will develop a locally agreed upon method for the scheduling of client appointments.

3. The client is given a copy of the referral form to take to PAWW. Client should also take photo ID to the appointment.
4. PAWW provider makes every effort to schedule the appointment and suit the client within three business days.

See **Attachment K** for the PAWW Referral Form and **Attachment L** for PAWW Locations and contact information.

### Local Management Committee (LMC) Meetings

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

See **Attachment H** for detailed LMC information.

### Direct Service Team (DST) Meetings

The purpose of the DST meetings is to discuss significant or multiple client barriers with the CAO and to jointly determine the correct referral for a client with barriers. The meetings are to be frequent and ongoing. They are to be in addition to standard communication between EARN staff and local CAO staff. Topics to be covered at DST meetings include but are not limited to client outreach, enrollments, plans, activities, hours, incentives and terminations.

### Contacts

Questions regarding EARN program policy should be addressed to [RA-BOPEARNPOLICY@PA.GOV](mailto:RA-BOPEARNPOLICY@PA.GOV).

Questions regarding EARN program validation requirements should be addressed to [RA-BPE-DPI@PA.GOV](mailto:RA-BPE-DPI@PA.GOV).

Questions regarding EARN program data entry into CWDS should be addressed to the CWDS Helpdesk at 1-866-236-6297 or [RA-CWDS@pa.gov](mailto:RA-CWDS@pa.gov)

Staff can also be reached at the Bureau of Employment Programs main line at 717-787-1302.

## ATTACHMENTS

### ATTACHMENT A EARN Attendance Sheet



EARN ATTACHMENT  
A (attendance sheet)

### ATTACHMENT B Community Service Desk Guide



EARN ATTACHMENT  
B (Community Service)

### ATTACHMENT C PA 1694



EARN ATTACHMENT  
C Community Service

### ATTACHMENT D PA 590



EARN ATTACHMENT  
D (PA 590).pdf

### ATTACHMENT E Confidential Release of Info



EARN ATTACHMENT  
E (Confidential Release)

### ATTACHMENT F EVF



EARN ATTACHMENT  
F (EVF) .pdf

### ATTACHMENT G Validation



EARN ATTACHMENT  
G (validation).pdf



**ATTACHMENT H LMC Operations**



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H (LMC).pdf

**ATTACHMENT I SPAL Request Form**



EARN ATTACHMENT  
I SPAL Request Form

**ATTACHMENT J SPAL Desk Guide - CAO**



EARN ATTACHMENT  
J SPAL Desk Guide.p

**ATTACHMENT K PAWW Referral Form**



EARN ATTACHMENT  
K PAWW Referral - P

**ATTACHMENT L PAWW Contact List**



EARN ATTACHMENT  
L PA WORKWEAR Cc