

EARN

EMPLOYMENT ADVANCEMENT AND RETENTION NETWORK



PROGRAM POLICY AND PROCEDURES MANUAL

**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF HUMAN SERVICES
Office of Income Maintenance
Bureau of Employment Programs**

PROGRAM YEAR 2022-2023

Table of Contents

SECTION 1 – INTRODUCTION	4
Program Overview	4
Eligibility Criteria	4
SECTION 2 – REFERRALS.....	5
CAO Referrals	5
Reverse Referrals	5
Project Referral Rejection Codes	6
SECTION 3 - ENROLLMENTS	7
Initial Program Enrollment.....	7
Individualized Employment Plan (IEP) /Service Plans.....	9
Extended TANF (ETANF) Participants.....	15
Refugee Participants	15
Determining Hours of Participation	15
SECTION 4 – Employment and Training (E&T) ACTIVITIES.....	17
E&T Activity Codes and Descriptions	17
Ongoing Social Service and/or Licensed Counseling Services	29
Vocational Education	30
Self-Initiated Students	30
Credentialing and Training Services.....	31
Activity Closing Codes	34
SECTION 5 – TRACKING PROGRAM PARTICIPATION & RECORD KEEPING Tracking Participation.....	35
Absences	35
Employment Documentation	37
Retention	37
Data Entry	39
Monthly Reporting.....	40
EARN Case Record Requirements.....	41
Internal Data Reconciliation	42
SECTION 6 – TERMINATIONS	43
Project Termination	43
Project Termination Codes	44
SECTION 7 – PERFORMANCE REQUIREMENTS & STANDARDS	45
Performance Standards/Goals.....	45

Monitoring	48
Technical Assistance	48
Monthly TANF Sample	49
Program Implementation Plan.....	49
SECTION 8 – PROGRAM OVERSIGHT.....	50
Americans with Disabilities Act of 1990 (ADA)	50
Limited English Proficiency (LEP)	50
Confidentiality.....	50
Client Incentives.....	50
Supportive Services.....	51
Direct Service Team (DST) Meetings.....	52
Local Management Committee (LMC) Meetings.....	52
Maximizing Participation Project (MPP) and Multidisciplinary Team Meetings (MDT)	52
Contacts	54
ATTACHMENTS.....	Error! Bookmark not defined.
ATTACHMENT A PA 1951	Error! Bookmark not defined.
ATTACHMENT B Reverse Referral Tracking Report	Error! Bookmark not defined.
ATTACHMENT C Contractor Letter #2021-05-25 Reverse Referrals.....	Error! Bookmark not defined.
ATTACHMENT D Contractor Letter #2021-05-06 ETANF Participants...	Error! Bookmark not defined.
ATTACHMENT E Operations Memorandum #20-08-01 Changes to Education Policy	Error! Bookmark not defined.
ATTACHMENT F EARN Attendance Sheet.....	Error! Bookmark not defined.
ATTACHMENT G PA 590.....	Error! Bookmark not defined.
ATTACHMENT H PA Community Service Desk Guide	Error! Bookmark not defined.
ATTACHMENT I PA 1694	Error! Bookmark not defined.
ATTACHMENT J EVF	Error! Bookmark not defined.
ATTACHMENT K Monthly Contractor Reporting CWDS Instructions.....	Error! Bookmark not defined.
ATTACHMENT L Confidential Release of Information	Error! Bookmark not defined.
ATTACHMENT M Validation.....	Error! Bookmark not defined.
ATTACHMENT N PIP.....	Error! Bookmark not defined.
ATTACHMENT O PA 1883.....	Error! Bookmark not defined.
ATTACHMENT P SPAL Desk Guide	Error! Bookmark not defined.
ATTACHMENT Q LMC.....	Error! Bookmark not defined.
ATTACHMENT R Cash Closing Widget.....	Error! Bookmark not defined.

ATTACHMENT S MDT..... **Error! Bookmark not defined.**

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).

Human-Centered Design is a framework for systems and services that places the needs and problems of those accessing the systems or services at the forefront. It allows for individuals or teams who design the systems and services to use empathy and creativity to understand the individual, their needs, and problems from their perspective to create plans for solutions to meet their needs.

Eligibility Criteria

CAO staff will determine eligibility for the EARN program and refer clients to EARN based on CAO policy and procedures. CAO staff will complete the Agreement of Mutual Responsibility (AMR) with hourly requirement based on household composition.

Individuals eligible for Temporary Assistance for Needy Families (TANF), and ineligible for or declining Diversion, may be referred to the EARN contractor.

SECTION 2 – REFERRALS

CAO 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 and are to be entered on the participant's CIS Referral Details screen. 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 expected that the program will continue to communicate with the CAO before referral rejecting a client. Local procedures should be established and followed to ensure the best interests of the participants are considered and addressed. The outreach plan, submitted via the PIP, should align with local procedure.

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.

Reverse Referrals

Reverse Referrals are program referrals that are initiated by the EARN service provider instead of the CAO. The provider must use the Reverse Referral Form (PA 1951) ([Attachment A](#)) to give the local CAO the information necessary to determine if the referral for a specific program or service is appropriate and allowable. The referral determination can then be shared with the

individual and provider. The institution of the PA 1951 does not change the policy or process for determining appropriate referrals or completing the AMR and submitting a system referral if the referral is approved. The form offers individuals an additional way to request consideration for programs and services in which they are interested.

Providers must report reverse referrals to DHS using the Reverse Referral Tracking Report ([Attachment B](#)). DHS is monitoring how many reverse referrals are rejected or accepted by the CAO. Only the reverse referrals that have received a response by the CAO should be on the list. Programs should inform BEP if pending reverse referrals are taking longer than 15 calendar days to be reviewed by the CAO. BEP can assist the programs in resolving the issue. The Reverse Referral Report is due by the close of business the first week of the month following the reporting month. Please refer to Contractor Letter #2021-05-25 Reverse Referrals ([Attachment C](#)) for more background and guidance regarding the Reverse Referral process.

Project Referral Rejection Codes

If the client does not report 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
- Need for technology to support remote participation
- Any other pertinent information

Each participant shall have an in-person or remote 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 or remote 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 and reviewed with the participant to the extent that the participant is willing and able to share. The assessment should be conducted in a private setting to the extent possible whenever it is conducted in person. The SIOH include, but are 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 (The provider must ensure this conversation can be held privately and in a safe space)
- Pregnancy

- Childcare and parenting
- Support network
- Work experience
- Work Capacity Assessment if required for ETANF participants

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

The assessment must be completed within 7 business days following the enrollment. In order to capture the performance standard correctly, the provider is expected to open AC 08, complete the assessment and close AC 08 within 7 business days following the participant enrollment.

Individualized Employment Plan (IEP) /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 that follows the participant throughout their enrollment. 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:
 - Treatments (including substance use disorder treatment, mental health treatment, and other rehabilitative treatments)
 - Interventions (including crisis mitigation and barrier remediation)
 - Education
 - Training and credentialing
 - Work experience (such as pre-apprenticeship or other unpaid work experience)
 - Community service opportunities
 - 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. **Maintain on-going contact with the participant.** Ongoing contact is defined as monthly contact that 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
 - Adult Basic Education
 - English as a Second Language
 - Post-secondary institutions
 - Keystone Education Yields Success (KEYS) providers
 - Education Leading to Employment and Career Training (ELECT)
 - WIOA Title I Individual Training Accounts
 - Registered Pre-Apprenticeships
 - Legal Assistance
 - Legal services
 - Criminal background inquiries and checks
 - Criminal record expungement
 - Pennsylvania Legal Aid Network
 - Life skills, including:
 - Financial literacy

- Parenting
 - Nutrition
 - Other appropriate information
 - Another Employment & Training Provider
 - EARN program in another area
 - Work Ready
 - KEYS
 - ELECT
 - SNAP 50/50
 - 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 access to, at least one qualified **Social Service Professional** to provide an outlet to discuss topics such as mental, social, physical, emotional, and behavioral health aspects of the participant's life. The work performed by the professional should be separated from the scope of work being performed by other staff. Social Service Professionals may consist of licensed professional counselors, social workers, therapists, allied health professionals or a combination of these professionals. The EARN service provider will submit to BEP, the qualifications of said professional for review.
- Social Service Professionals must be available in sufficient numbers so that each participant can be offered the opportunity for is able to have an introductory 1-on-1 meeting with said professional within 14 business days of their program enrollment.
 - During this introductory meeting the Social Service Professional will be required to explain their offered services, review participant assessments, offer services or resources to address identified barriers, and act as a social service coordinator between the grantee, participant, and outside resources. The Social Service Professional will then coordinate and refer the client to any appropriate ongoing services; if they will be the ongoing service provider, they may enroll the client as well. Licensed professionals must be made available on site at least one day per month, based on participant need. 1-on-1 meeting days comply with this requirement.
 - If the social service professional is not a licensed social worker or counselor, they may only act as a referral source and must refer the participant to professionals specially trained to provide such services. This includes but not limited to domestic violence or physical and mental health related issues.

- Social Service 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 should develop a crisis response plan to include professional having 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.

Beginning with this PY, the provider will data enter the referral in CWDS using a newly added field in the service authorization field. The provider will create a service category and select Scheduled Appointments to document the referral. The social service professional will record the appointment outcome by indicating if the appointment was conducted or the client did not keep the appointment. In order to capture this performance standard, the initial 1-on-1 meeting is to be scheduled within 14 business days of the participants enrollment.

Note-If the social service professional does not have access to CWDS, the data entry can be completed by provider designated staff.

5. **Provide activities and programs that lead to acquiring job-related and job readiness skills** in addition to education and employment activities. 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
 - Digital literacy
 - Resume writing
 - Interview techniques
 - Education on regional High Priority Occupations and local job market: [High Priority Occupations](#)

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, GED, Adult Basic Education, and English as a Second Language programs as stand-alone activities or as part of a career pathway in which 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 or are interested in enrolling at a Pennsylvania community college to pursue an education activity that leads to receipt of a diploma, certificate, license or industry recognized credential. 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. An ELECT referral must be completed before the participant reaches the age of 22. 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 for all qualifying hours worked. 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.

Extended TANF (ETANF) Participants

ETANF recipients are individuals who have received more than 1830 days of TANF with a hardship as defined by the state (to include domestic violence victims and individuals who are temporarily or permanently disabled and required to participate in Maximizing Participation Project) who have been granted additional time and opportunities to work toward achieving economic independence, including continuing or starting an education or training activity. There are currently Seven Hardship Tracks in which an individual may be placed to qualify for ETANF.

Please refer to [ATTACHMENT D](#) Contractor Letter #2021-05-06 ETANF Participants for more guidance on the various Hardship Tracks and participants', CAOs', and EARN providers' responsibilities for each.

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 12 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 that 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: 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

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 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.

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

For EARN clients who self-initiate, it is important to note that 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](#).

Paid Activities				
Type	Definition	Limitations	Activity Codes	Verification Requirements
Unsubsidized Employment	The Commonwealth of Pennsylvania (Commonwealth) defines unsubsidized employment as full- or part-time employment in the public or private sector, including self-employment, apprenticeships, internships, work study, and employment resulting in income-in-kind compensation, in which neither the employer nor employee receives a subsidy from TANF or other public funds.	The number of countable hours of unsubsidized employment counted towards participation is determined based on the hours of work, including any paid breaks built into the schedule, and any paid leave time, including sick, personal, vacation, parental, and holiday time, granted by the employer. For individuals with tipped wages, the actual hours stated on the past stub are the verified hours worked.	AC 33 – Unsubsidized Employment (core) AC 30 – Income-in-kind Employment (core)	Below is a list of allowable methods to document and verify paid activities: <ul style="list-style-type: none"> • Copies of paystubs that reflect actual hours for corresponding week ending pay periods or, at least one pay stub that was current, if it is representative of ongoing income, at the time it was used to project hours (for no more than six months); • A letter or statement from the employer that enumerates hours and includes gross pay amounts and pay dates; • A copy of an attendance record as verified by the employer that enumerates hours and includes gross pay amounts and pay dates; • State or contractor employment verification form that contains historical gross pay amounts, pay dates, and pay rate; • Time sheets as verified by the employer that enumerate hours of employment and includes gross pay amounts and pay dates; • A letter stating the details of the work provided as income-in-kind to include the number of hours or total value of the goods or services; • Collateral contacts including employee's supervisory, pay roll, or management staff but not a co-worker (obtain name, phone number, and title of the employer's representative providing the information); or • Independent verification sources such as employee's pay account (via phone, email, or digital device), Commonwealth-contracted verification
Subsidized Employment Private Sector	The Commonwealth defines subsidized private sector employment as full- or part-time employment in the private sector for which the for-profit employer receives a subsidy from TANF or other public funds to offset some or all of the wages and costs of employment for the individual. This includes apprenticeships, internships, work study, and any other subsidized employment with a for-profit employer in which the employer is provided with a wage subsidy to assist with payment of wages to the individual for work performed.	Subsidized private sector employment does not include "on-the-job training" programs, where employers are subsidized to offset the costs of training. Hours of participation in supportive activities, such as substance abuse treatment, mental health treatment or rehabilitation activities, or various other barrier-removal or educational activities, can only count toward the participation rates if the individual is paid for these hours as part of the subsidized employment activity.	AC 23 – Subsidized Employment Private Sector (core) AC 51 – Subsidized Work Study (private sector - core)	
Subsidized Employment Public Sector	The Commonwealth defines subsidized public sector employment as full- or part-time employment in the public sector for which the employer receives a subsidy from TANF or other public funds to offset some or all wages and costs of employing an individual. Subsidized public sector employment includes apprenticeships, internships, and work study with a unit of federal, state, or local government, or non-profit organization in which the employer is provided with a subsidy to assist with payment of wages to the individual for work performed. Examples of subsidized public sector employment include: <ul style="list-style-type: none"> • Preservation, enhancement and remediation of the environment; • Caring for and supporting the education and well-being of children, the elderly, persons 	When employment is subsidized with TANF funds, provided by the Commonwealth, there must be an approved operational budget, with a budget justification that provides a comprehensive subsidized employment plan and outlines time limits.	AC 26 – Subsidized Employment Public Sector (core) AC 51 – Subsidized Work Study (public sector - core)	

	<p>with physical or developmental disabilities, and persons with low incomes;</p> <ul style="list-style-type: none"> • Improvement activities on public land or facilities; • Projects or activities which improve public health, safety, and welfare; and • On-going activities that support the services provided by non-profit and government organizations. 			<p>providers (such as Equifax/Work Number).</p> <ul style="list-style-type: none"> • Statement from the self-employed individual showing gross earned income (less allowable business expenses) such as business ledgers, invoices, expense reports, or a representative tax return.
On-the-Job Training	<p>The Commonwealth defines on-the-job training (OJT) as full- or part-time, private, or public sector training that is given to a paid employee while they are engaged in productive work. This training provides knowledge and skills essential to the adequate level of performance on the job.</p> <p>OJT provides individualized occupational skills training to acquire specific skills and employment competencies through participation in a work setting. The participant gains familiarity with the processes, work tasks, tools and methods of a specific job or group of jobs. OJT is intended to place participants in occupations that improve their prospects for employment that leads to self-sufficiency. This activity may include internships, practicums, professional certification, and clinical training required by an academic or training institution for licensure, when the client is paid by an employer to attend.</p>	<p>Employers who fail to retain participants without good cause will not be given an additional OJT contract.</p> <p>When OJT is provided with TANF funds, provided by the Commonwealth, there must be an approved operational budget, with a budget justification that provides a comprehensive OJT plan and outlines time limits.</p>	AC 22 – On-the-Job Training (core)	

Unpaid Activities				
Type	Definition	Limitations	Activity Codes	Verification Requirements
Work Experience	The Commonwealth defines work experience as a work activity performed in return for welfare that provides the individual with an opportunity to acquire the general skills, knowledge, and work habits necessary to obtain and maintain employment. The purpose of work experience is to improve the employability of those who cannot find or maintain unsubsidized full-time employment. This activity must be supervised by an employer, work site sponsor, or other responsible party on an ongoing basis no less frequently than once each day in which the individual is scheduled to participate. Unpaid pre-apprenticeships, unpaid entrepreneurship, unpaid apprenticeships, and unpaid internships are an examples of work experience. Work experience also includes work associated with the refurbishing of publicly assisted housing.	<p>Individuals can participate in work experience as their work activity to the extent permitted under the Fair Labor and Standards Act (FLSA).</p> <p>Individuals who are engaged in work experience for the full number of hours permissible under FLSA but whose permissible hours under the FLSA are lower than the hours required to meet full participation are deemed the additional core hours.</p> <p>Example: In a single-parent household, regardless of the age of the youngest child, the parent can deem their work experience hours up to their <i>core hourly requirement per week</i>. Therefore, if the parent has an FLSA maximum of 14 hours of work experience per week and participate for all 14 hours in any given week, the participant is deemed to have met their core participation requirement and 20 hours is entered into CWDS. Additional core/noncore hours can be completed in any activity.</p>	AC 21 – Work Experience (unpaid - core)	<p>An individual's participation in work experience is verified by contracted providers who maintain attendance records such as paper or electronic time sheets, time clocks, swipe card systems, telephone time, official Commonwealth forms, and/or other attendance systems. All methods include the participants' identifying information including name and/or ID number and are to be signed or verified by a case manager, instructor, or supervisor. Methods of verification could include:</p> <ul style="list-style-type: none"> • Completion of Employment and Training Activity Verification Form (PA 1895); or • A preapproved contractor attendance sheet that contains the same data captured in the PA 1895; or • Work Experience Verification Form (PA 1980)
Job Search and Job Readiness Assistance	The Commonwealth defines job search and job readiness assistance as the act of seeking or obtaining employment and/or preparation to seek or obtain employment. Job Readiness includes appropriate employability/skills/education assessments, life skills training/coaching, substance abuse treatment, mental health treatment, or rehabilitation activities. <i>Such treatment or therapy must be determined to be necessary and documented by qualified medical, substance abuse, or mental health professionals.</i> Job search (AC 42) and job readiness activities must be supervised by the contracted provider, TANF agency, or other responsible party on an ongoing basis not less frequently than once each day in which the individual is scheduled to participate.	<p>Time spent in AC 8 – Assessment is limited to seven business days.</p> <p>Except for AC 8 (see above) Pennsylvania has opted not to enforce time limits associated with this federal activity (AC 4, AC 42, AC 44, and AC 49) at the contractor level when an individual is actively engaged with the contractor and working on their goal plan as listed on their AMR and IEP regardless of how long the individual remains in these activity codes.</p>	<p>AC 4 – Life and Parenting Skills (core)</p> <p>AC 8 – Assessment (core)</p> <p>AC 42 – Job Search (core)</p> <p>AC 44 – Job Readiness Assistance including barrier remediation (core)</p> <p>AC 49 – Rehabilitative Services (core)</p>	Employment and training, substance abuse, mental health, domestic violence, and other rehabilitative services providers maintain paper or electronic time sheets, time clocks, swipe card systems, telephone time, other attendance systems, and job search logs with date/time stamps to verify the participant's attendance and activities. All methods include the participants' identifying information including name and/or ID number and are to be signed or verified by a case manager, instructor, or supervisor.

	<p>Examples of activities included under this type are:</p> <ul style="list-style-type: none"> • Workplace preparation that may include instruction in interviewing techniques, resume preparation skills, time management, and identification of employer and workplace expectations. (AC 44) • Problem solving, reading comprehension, decision making, and critical thinking skills (all considered executive function abilities) (AC 44) • Limited basic literacy and English-as-a-Second Language (ESL) preparation embedded with job readiness assistance as necessary for an individual to seek or obtain employment; this includes literacy and English instruction in the context of preparing a resume or job application, interviewing skills, workplace expectations, and effective job seeking (AC 44) • Barrier remediation services to prepare individuals for job search and employment such as (but not limited to) criminal history assistance, family services, homelessness/housing services, domestic violence assistance, and vocational rehabilitation (AC 44) • Basic life skills instruction such as balancing life and work, budgeting, parenting classes, and household management. (AC 4) • Career exploration including aptitude testing. (AC 44) • Job readiness, skills, and literacy assessments. (AC 44) • Substance abuse treatment, mental health treatment, and other rehabilitative treatments <u>when the necessity of treatment is documented by a qualified medical, abuse, or mental health professional.</u> (AC 49) 			
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Community Service Programs	<p>The Commonwealth defines community service programs as structured programs and embedded activities in which individuals perform unpaid work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service programs must be limited to projects that serve a useful community purpose in fields such as health, social service, environmental protection, education, urban and rural redevelopment, welfare, recreation, public facilities, public safety, and childcare. Community service programs are designed to improve the employability of individuals not otherwise able to obtain unsubsidized full-time employment and must be supervised on an ongoing basis no less frequently than once a day in which the individual is scheduled to participate.</p> <p>Activities identified as community service programs must include community and social services provided by federal, state, and local governments, faith-based organizations, and non-profit organizations that qualify as tax-exempt under section 501(c) of the Internal Revenue Code. These organizations must be qualified to provide community service opportunities that provide value in the activities or tasks that participants perform comparable to work for which an employer would normally pay at least minimum wage.</p>	<p>An individual may participate in community service programs for an unlimited number of hours, but the Commonwealth considers only the total number of hours allowed under the FLSA toward participation requirements.</p> <p>Individuals who are engaged in work experience for the full number of hours permissible under FLSA but whose permissible hours under the FLSA are lower than the hours required to meet full participation are deemed the additional core hours.</p> <p>Example: In a single-parent household, regardless of the age of the youngest child, the parent can deem their community service hours up to their <i>core hourly requirement per week</i>. Therefore, if the parent has an FLSA maximum of 14 hours of community service per week and participate for all 14 hours in any given week, the participant is deemed to have met their core participation requirement and 20 hours is entered into CWDS. Additional core/noncore hours can be completed in any activity.</p>	<p>AC 20 – Community Service (core)</p>	<p>An individual's participation in community service is verified by contracted providers who maintain attendance records such as paper or electronic time sheets, time clocks, swipe card systems, telephone time, official Commonwealth forms, and/or other attendance systems. All methods include the participants' identifying information including name and/or ID number and are to be signed or verified by a case manager, instructor, or supervisor. Methods of verification could include:</p> <ul style="list-style-type: none"> • Completion of Employment and Training Activity Verification Form (PA 1895); or • A preapproved contractor attendance sheet that contains the same data captured in the PA 1895; or • Community Service Verification Form (PA 1979) <p>See the Appendix for community services forms:</p> <p>Attachment G- PA 590 Attachment H- Community Service Desk Guide Attachment I- PA 1694</p>
Vocational Educational Training	<p>The Commonwealth defines vocational educational training, not to exceed 12 countable months with respect to any individual, as organized educational programs that are directly related to the preparation of an individual for employment in current or emerging occupations. Vocational educational training includes a specific curriculum of training provided by a contracted employment and training vendor, an accredited educational provider, or an accredited Internet-based educational institution that is intended to</p>	<p>The vocational educational training that is provided must be consistent with local labor market demands.</p> <p>The federal limit is 12 months in a lifetime for TANF Sample/Work Participation Requirement purposes.</p> <p>Pennsylvania allows for individuals to continue their vocational educational trainings for 24 months with possibility of six-month extensions thereafter. Seek BEP approval after 24 months.</p>	<p>AC 14 – Enrolled in a KEYS Program Institution (core)</p> <p>AC 16 – Enrolled in any post-secondary institution not defined as a KEYS Program Institution (core)</p> <p>AC 24 – Vocational Education (core)</p>	<p>Due to changes in technology, a student participating in vocational educational activities on campus or online may have their hours of participation verified utilizing several different methods. All methods include documentation of class schedule, class credits, ongoing case manager contact, study policy, and satisfactory progress in the vocational educational activity.</p> <p>When the participant is enrolled with a Commonwealth contracted employment and training program, staff may utilize self-</p>

	<p>prepare the participant for a specific occupation.</p> <p>Activities identified as vocational educational training include certificate and credit-yielding activities designed to prepare the individual with the skill and knowledge necessary to perform the duties of a specific job or occupation. Vocational educational training programs that lead to employment are facilitated by employment and training contractors contracted by the Commonwealth and may include vocational-technical schools, degree or certificate programs at secondary and post-secondary educational institutions, and accredited Internet-based educational institutions. Vocational educational training may take place at a secondary school, but it will not consist of secondary school training or be part of a secondary school diploma. The Commonwealth includes attendance at community college or its equivalent in a course of study intended to prepare the participant for a specific occupation as Vocational Educational Training. Vocational educational training may include programs leading to a baccalaureate degree.</p> <p><u>Accredited internet-based education and distance learning</u>, including blended learning (hybrid of online and in-person classes), is counted toward participation as vocational educational training.</p> <p>Activities that the Commonwealth counts toward participation in vocational educational training include:</p> <ul style="list-style-type: none"> • industry skill certifications to achieve and demonstrate skills necessary for specific occupations; • credentialing programs provided to improve an individual's ability to obtain and maintain employment; 	<p>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.</p>	<p>AC 27-Credential Program Only (core)</p>	<p>reported hours of participation in an accredited educational institution if they have ongoing contact with the participant, access to course credits and grades, and are otherwise able to monitor course progress. Ongoing contact is defined as monthly contact that may be in-person, via telephone, or electronic.</p> <p><u>For credited courses, supervised or unsupervised study time</u> is counted at the maximum time indicated by the accredited educational institution's study policy. If the institution has no study policy, the Commonwealth will count one hour of study time for every hour of classroom time.</p> <p><u>For courses that are not credited, supervised or unsupervised study time</u> is counted at the maximum time indicated by the accredited educational institution's study policy. The total hours of countable unsupervised and supervised study time may not exceed the number of hours as verified by the institution's study policy. If the institution has no study policy the Commonwealth will count one hour of study time for every hour of classroom time.</p>
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	<ul style="list-style-type: none"> • 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 in vocational fields; • High School Equivalency (HSE), General Equivalency Degree (GED), Adult Basic Education (ABE), English as a Second Language (ESL) programs when these classes are integrated within, taken concurrently with, or for a limited-duration prerequisite to post-secondary education or training as part of a career pathway program; • baccalaureate degree programs including those that result in a bachelor of arts, bachelor of science, or a bachelor of applied science degree in vocational fields; and • organized educational programs that are directly related to the preparation of individuals for employment in current or emerging occupations requiring training other than a baccalaureate degree. 			
Satisfactory Attendance at a Secondary School or in a Course of Study Leading to a Certificate of General Equivalence	<p>The Commonwealth defines satisfactory school attendance at secondary school or in a course of study leading to a certificate of general equivalence, in the case of a recipient who has not completed secondary school or received such a certificate, as an individual regularly attending secondary school or course of study leading to a certificate of general equivalence. The individual must be participating in accordance with the requirements of the secondary school or course of study. The activity must be supervised on an ongoing basis no less frequently than once each day in which the individual is scheduled to participate.</p>	<p>This is a core activity for participants under 20 years of age. When the participant maintains satisfactory progress as determined by the educational provider, the client will receive credit for 20 hours per week of activity.</p> <p>This is a noncore activity for individuals 20 and over who are not enrolled in high school or in the ELECT program. Use AC 34. See Education Directly Related to Employment for Participants without a High School Diploma or GED.</p> <p>For individuals who are 20 and 21, Pennsylvania considers their RESET requirements to be fulfilled in this activity due to Pennsylvania law which allows individuals to be enrolled in High School up</p>	<p>AC 13 – High School/HSE/GED/GED prep (ELECT use only)</p> <p>AC 18 – Satisfactory Attendance in High School or Equivalent HSE/GED/GED prep (core for individuals under 20)</p> <p>AC 34 – Vocational Education for participant without a high school diploma or GED (noncore)</p>	<p><u>Satisfactory school attendance at secondary school or in a course of study leading to a certificate of general equivalence</u> meet federally required work participation hours using documentation from the educational institution that the student is maintaining expected regular daily attendance.</p> <p>Regular attendance is identified by the school district. The Commonwealth does not extend excused absence criteria beyond that which the educational institution adopts for its students.</p> <p>For an individual who is 22 or older and not enrolled in the ELECT program, utilize</p>

	<p>Activities identified as satisfactory school attendance at secondary school or in a course of study leading to a certificate of general equivalence include active and successful participation in high school, vocational technical school, on-line courses, and any accredited curriculum that results in a high school diploma or its equivalent. This also includes enrollment and participation the Commonwealth's Education Leading to Employment and Career Training (ELECT), Pregnant and Parenting Youth (PPY) and Fatherhood Initiative programs in any of the manners described above.</p> <p><u>Accredited Internet-based education and distance learning</u> including blended learning (hybrid of online and in-person classes), is counted toward participation as satisfactory school attendance at secondary school or in a course of study leading to a certificate of general equivalence.</p>	<p>to the age of 21, however for federal purposes this activity is noncore.</p> <p>If an individual is 20 or older (not enrolled in high school or ELECT) and is participating in HSE/GED/GED prep when these classes are integrated within, taken concurrently with, or for a limited-duration prerequisite to post-secondary education or training as part of a career pathway program this is a core activity. Use AC 24. See Vocational Educational Training for additional information.</p>	<p>AC 24 – Vocational Education (core)</p>	<p>Vocational Educational Training verification guidance.</p> <p>Vocational Education Activity Codes- 7/1/22</p>
<p>Providing Child Care Services to an Individual Who is Participating in a Community Service Program</p>	<p>The Commonwealth defines providing child care services to an individual who is participating in a community service program as an individual caring for the child(ren), <u>without payment</u>, to enable another TANF or state-funded, Separate State Program (SSP) recipient in community service program as described above under Community Service Programs.</p> <p>This is an unpaid activity and must be a structured program designed to improve the employability of individuals who participate in this activity. This activity must be supervised on an ongoing basis no less frequently than once each day in which the individual is scheduled to participate.</p>	<p>Providing child care services to an individual who is participating in a community service program is counted toward participation using documentation of actual hours the recipient of the child care is engaged in community service plus reasonable travel time to and from the community service site.</p> <p>If the individual receives any income either from the parent of the children or the state's subsidized child care system, this activity is then deemed to be a paid activity and should be recorded and verified as such.</p>	<p>AC 6 – Providing Child Care Services to an Individual Participating in a Community Service Program</p>	<p>An individual's participation in providing child care services to an individual who is participating in a community service program is verified by contracted providers who maintain attendance records such as paper or electronic time sheets, time clocks, swipe card systems, telephone time, official Commonwealth forms, and/or other attendance systems. All methods include the participants' identifying information including name and/or ID number and are to be signed or verified by a case manager, instructor, or supervisor. Methods of verification may include:</p> <ul style="list-style-type: none"> • Completion of Employment and Training Activity Verification Form (PA 1895); or • A preapproved contractor attendance sheet that contains the same data captured in the PA 1895; and • The contractor must obtain documentation of the individual's

				participation in a Community Service Program for which the childcare is needed.
Job Skills Training Directly Related to Employment	<p>The Commonwealth defines job skills training directly related to employment as formal training or education to provide an individual with the ability to obtain employment or to advance or adapt to the changing demands of the workplace. Job skills training directly related to employment must be supervised on an ongoing basis no less frequently than once each day in which the individual is scheduled to participate.</p> <p>Job skills training directly related to employment must be provided by a contracted employment and training vendor, an accredited educational provider, or an accredited internet-based educational institution that is specifically designed to improve an individual's skills on the job and may include continuing education or job skills courses. This may include a single class or a full course of training or study.</p> <p>The Job Skills Training Directly Related to Employment offered is consistent with local labor market demands. Activities that the Commonwealth counts toward participation in job skills training directly related to employment include:</p> <ul style="list-style-type: none"> • Upgrades of an individual's job-related skills including single classes as well as instructional certificate programs that are awarded based upon completion or accumulated credits. • Industry skill certifications to achieve and demonstrate skills necessary for specific occupations. • Associate degree programs including an associate of arts, associate of science, or an associate of applied science degree in vocational fields. 	<p>When possible, core hours should be fulfilled prior to using noncore activities.</p> <p>Individuals who do not qualify for good cause and who have exceeded their 12 months of Vocational Educational Training OR individuals who were not granted six-month extensions past the initial 24 months may complete their program under this category receiving credit towards participation for required non-core activity hours.</p>	<p>AC 38 – Job Skills Training Directly Related to Employment (noncore)</p> <p>AC 11 – English-as-a-Second Language (ESL)/English Language Training (ELT) (noncore but can be used to fulfill RESET requirements)*</p> <p>AC 12 – Adult Basic Education/Literacy (ABE) (noncore but can be used to fulfill RESET requirements)*</p> <p>*NOTE: If ESL/ABE noncore vocational education activities are integrated within, taken concurrently with, or for a limited-duration prerequisite to post-secondary education or training as part of a career pathway program it may be counted as a core activity. Use AC 24 or AC 27 (whichever is more appropriate) in these instances. See Vocational Educational Training for more details.</p>	See Vocational Educational Training Verification.

	<ul style="list-style-type: none"> Post-secondary education directly related to employment that leads to a Bachelors degree. <p>Additional activities may be embedded within the curriculum and include HSE, ESL, ABE, and adult literacy.</p> <p><u>Accredited Internet-based education and distance learning</u>, including blended learning (hybrid of online and in-person classes), is counted toward participation as job skills training directly related to employment.</p>			
Education Directly Related to Employment for Participants without a High School Diploma or GED	<p>The Commonwealth defines education directly related to employment, in the case of a recipient who has not received a high school diploma or a certificate of high school equivalency, as an ancillary educational activity specifically designed to improve an individual's proficiency in English, remedial education to increase literacy levels consistent with employment goals, or to provide a high school education or equivalent to an individual who has not received a high school diploma or GED when the individual's anticipated field of employment generally requires a GED as a minimal criterion. Education directly related to employment may include distance-learning and Internet-based on-line courses available from accredited educational institutions.</p>	<p>This is specifically for individuals who have not received a high school diploma or equivalence. While Pennsylvania allows these individuals to fulfill their RESET requirements with this activity if good cause is granted by the CAO, it is counted as a noncore activity by the federal government.</p>	<p>AC 34 – Vocational Education for participant without a high school diploma (noncore)*</p> <p>AC 11 – English-as-a-Second Language (ESL)/English Language Training (ELT) (noncore but can be used to fulfill RESET requirements)*</p> <p>AC 12 – Adult Basic Education/Literacy (ABE) (noncore but can be used to fulfill RESET requirements)*</p> <p>*NOTE: If GED/HSE/ESL/ABE noncore vocational education activities are integrated within, taken concurrently with, or for a limited-duration prerequisite to post-secondary education or training as part of a career pathway</p>	<p>See Vocational Educational Training Verification.</p> <p>Please see page 33 for more information about HSE/GED/ESL/ABE vocational education policy</p>

			program it may be counted as a core activity. Use AC 24 or AC 27 (whichever is more appropriate) in these instances. See Vocational Educational Training for more details.	
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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. Review the E&T Activity Codes and Descriptions chart (p. 17) for methods on how to log and verify each type of activity conducted remotely.

Ongoing Social Service and/or Licensed Counseling Services

EARN service providers must also provide access to professionals who are trained and certified to provide social work or counseling services. These additional services will be available to support participants who may need more intensive assistance or who want to discuss topics impacting their life with a trusted and trained professional. The professionals should have knowledge of local resources and social service coordination, as well as counseling skills to establish rapport, discuss sensitive topics such as domestic violence and substance use concerns, and respond effectively to participant needs including referrals to ongoing counseling or therapeutic services if needed.

The professionals will serve as a resource for staff to consult with regarding participant needs, as appropriate. They will also work with staff to identify and address broader issues that may be impacting participants' success. This may include communication and advocacy with relevant entities including program administrators and state staff.

If it is determined by a medical professional that the participant will receive ongoing services provided by the EARN service provider's licensed counselor and/or social service professional, the provider will implement the following procedure:


- All participants receiving ongoing counseling services will be indicated by the opening of the CWDS sub-project code 78.
- For sub-project code 78 participants who require mental health rehabilitation as verified by a medical professional, the appropriate CWDS activity codes is 49 as defined in the table above.
- Ongoing case management services (activity code 92) provided by the contractor in association with the participants involvement with activity code 49 should be tracked independently and only for time spent providing case management services to participants.
- Appropriate CWDS case progress notes will be updated as the participant proceeds through the counseling services.

If it is not determined medically necessary but the participant will receiving ongoing services provided by the EARN service provider's licensed counselor and/or social service professional, the provider will follow all guidance above with the exception that activity code 44 (barrier remediation) will be used in place of 49 (rehabilitative services).

Vocational Education

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:  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 if specific criteria is met	
	27				24 months with 6-month extensions thereafter if specific criteria is met. For credential, license, certificate, and degree programs only	

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.

Workforce Innovation and Opportunity Act (WIOA) co-enrollment opportunities are to be explored by all EARN providers. Co-Enrollment ensures that an individual receives skills training, or other education, to carry out their individualized employment plan while providing needed support to reduce the probability of participant drop-out due to barriers. Participants who are co-enrolled in multiple programs have resources leveraged in a way that increases the probability to achieve long-term success in the labor market.

WIOA mandated core programs and partner programs identified for co-enrollment include:

- Adult, Dislocated Worker, and Youth Activities (Title I);
- Adult Education and Literacy Activities (Title II);
- Wagner-Peyser (Title III);
- Vocational Rehabilitation Services (Title IV); and
- Temporary Assistance for Needy Families (TANF)
- Supplemental Nutrition Assistance Program Employment & Training (SNAP E&T)
- Reemployment Services and Eligibility Assessments (RESEA)
- Trade Adjustment Assistance (TAA)

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 in-house credentials to the Bureau of Employment Programs (BEP) for review prior to implementation. Credentialing programs must have a direct connection to industries listed on the High Priority Occupation (HPO) list. In-house credentialing is tracked using AC 27. 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.

Providers are to maintain an accurate and current list of all credentialing programs.

NOTE - External credentialing programs, already accredited by the Pennsylvania Department of Education (PDE) and/or any trainings programs provided via Pennsylvania Department of Labor and Industry's (DLI) [Eligible Training Participant List \(ETPL\)](#), must still be submitted to BEP for review. This ensures that BEP can maintain a list of all credentialing programs being offered to participants.

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.

HSE/GED/ESL/ABE

Vocational Education training includes adult education activities, such as High School Equivalency (HSE), General Equivalence Degree (GED), English-as-a Second Language (ESL) and Adult Basic Education (GED). 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.

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 IEP 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 – TRACKING PROGRAM PARTICIPATION & RECORD KEEPING

Tracking Participation

Participation hours in all activities except unsubsidized employment must be tracked by the EARN program staff. The tracking guidance below applies to activities other than unsubsidized employment

Key Terms Related to Tracking Participation

Daily supervision must be provided by the employment and training contractor, the accredited educational provider, or an accredited Internet-based educational institution.

Daily supervision does not mean daily in-person contact. Daily supervision requires ongoing contact. The supervision must be ongoing and may be via telephone or electronic contact such as email, text, course attendance reports and grades, or other software and ensures that the individual participates and progresses in their assigned activities.

Ongoing contact is defined as monthly contact that may be in-person, via telephone, or electronic.

Satisfactory Progress is defined as meeting the college's expectations to remain enrolled in the college the following semester. Where required, evidence of satisfactory progress can 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; or
- Documentation of expected assignments and confirmation of completion and submission of assignments on a weekly basis.

When unpaid work activities are coordinated through an employment and training contractor, the contractor reports directly to the Commonwealth via a computerized and automated data processing interface and maintains documentation in the case record for six years. Data entry by the contractor of the hours of participation is sufficient documentation.

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, including holiday 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.

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. When available, the EARN service provider is to collect documentation from a third party describing or documenting the reason for the absence.

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 J](#)) or the Work Number (or similar service). Hours of employment for TANF and former TANF participants may be projected from a single paystub for 6 months at a time. The service provider will be asked to provide actual paystubs for the purpose of job placement validation and TANF sampling. A copy of at least one pay stub that was current, if it is representative of ongoing income, at the time it was used should be used to project future hours in CWDS at the beginning of each month in situations where the participant has not provided any updates. 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.

Retention

Retention eligibility begins when a participant’s TANF benefits close due to earned income. The program will be notified of TANF closure when the participant's case status changes from Enrolled to 45 Day Hold. This indicates the client's TANF budget has a closure date and program must contact the CAO to verify the reason for the TANF closure.

NOTE: When a client is eligible for Transitional Cash Assistance (Program Status Code 71), the CWDS case does not go into 45 Day Hold status until shortly before TCA closes. The

Cash Closing Case List widget on the Case Management Dashboard helps the contractor identify participants whose TANF cash budget has closed prior to the CWDS case status changing from Enrolled to 45 Day Hold.

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. During the retention period, providers must data enter hours each month using the hours from the placement verification

At any point during retention, the provider learns that the individual is no longer employed or TANF has been reopened, the AC 33 and sub-project 01 should be closed.

NOTE – Failure to data enter the representative hours monthly will result in errors on the Missing Attendance Hours report.

Retention and Increased Earned Income Verification

The EARN service provider must verify employment at 6 months (183 days) and 12 months (365 days) 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, and the hourly rate must be adjusted for the initial job placement.

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.

AC 92 should be opened if the participant is in retention, has lost their job and the TANF benefits remain closed. AC 92 will be used to track the participant engagement.

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 F](#)). 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 are expected to completed Monthly Contractor Reporting screens in CWDS at the office level once a month. Special detail is given to measures that may have been covered in the Program Implementation Plan (PIP), but that are not captured through routine CWDS data entry. To access this screen, log into CWDS 2.0.

Please see [Attachment K](#) for Monthly Contractor Reporting CWDS instructions

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 F](#)) for the EARN Attendance sheet)
- Job Search Logs
- Excused Absence Logs
- Release of Information Form (See [Attachment L](#))
- Employment Verification Form (EVF) (See [Attachment J](#))
- 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	
<p>Withdraws or Terminates Without Good Cause. Client withdraws from the program without good cause or fails 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 without a valid excuse 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	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 2022 – 2023 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	Goal	Measurement
Assessment	A comprehensive household assessment must be conducted and completed within 7 business days of a participant's enrollment.	85% of all enrolled participants.	<p>A comprehensive household assessment must be conducted and completed within 7 business days of a participant's enrollment.</p> <p>This is tracked by Activity Code 08, which must be closed when the assessment is totally completed. The end date of the Activity Code 08 must be within 7 business days from a participant's enrollment.</p>
IEP	<p>A detailed IEP must be documented and include at least one barrier, goal and an agreed upon plan for resolution within 14 business days after the assessment is completed.</p> <p>Note that any IEP completed and signed by a participant without the above may count against a program's total count of timely IEP's during monitoring</p>	85% of all enrolled participants.	A detailed IEP must be documented and include plans to address barriers and goals that are discussed with the participant. The expectation is that the IEP will be documented as described, discussed with, and signed (electronically) upon by the participant in the CWDS system, within 14 business days after the assessment is completed (which is determined by the end date of Activity Code 08).

Category	Description	Goal	Measurement
Social Service Professional	Employee a social service professional who will conduct an introductory meeting to explain professional social services available to participants. The duties of this professional are to be separate from the duties of other ongoing case management services.	80% of all enrolled participants will be referred to have an introductory 1-on-1 meeting with staff within 14 business days from the participant's program enrollment.	Timely completion will be tracked by the date the referral was data entered under Service Authorization, via CWDS, along with the timely closing and outcome.
Secondary Equivalency and Credentialing (including referrals to outside programs)	<p>Coordination of educational activities through referrals to ELECT service providers and the KEYS program</p> <p>--OR--</p> <p>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.</p> <p>Each participant is eligible for up to three (3) credentials in succession per enrollment if one is high school equivalency, and up to two (2) if one is not high school equivalency.</p>	<p>50% of participants who.</p> <p>Engaged in an activity that results in a credential activity, earn a credential.</p> <p>Or participants who achieve a successful transfer from the EARN program to the KEYS or ELECT program.</p>	<p>Participants may earn credit toward this performance measure in the following ways:</p> <p>-Transfer to an ELECT or KEYS program (indicated by project termination code X), or,</p> <p>-Becoming enrolled in an industry recognized credentialing program as tracked by Activity Code 27 where the end result is the participant earning said credential as indicated by Activity Code 27 being closed with Activity Termination Code C</p>

Category	Description	Goal	Measurement
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 for all qualifying hours worked.	70% of participants with employment must meet placement criteria.	<p>A participant who is employed will meet the placement standard in months where:</p> <ul style="list-style-type: none"> -They work 80 hours or more over a consecutive 4-week period, averaging to 20 hours a week, and, -They earn a wage \$2.00 above the minimum wage per hour, per the hourly pay rate entered on the placement report in CWDS when Activity Code 33 is opened. <p>Placement may be met at any time once employment begins until the end of the retention period.</p>
Retention	<p>Retention begins when an individual obtains unsubsidized employment (Activity 33) and TANF benefits are closed due to earned income. This is indicated by the CWDS sub-project code 01.</p> <p>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 (183 days) and twelve (12) months (365 days) after the project ends.</p>	<p>50% of all enrolled participants who are placed in employment achieve retention.</p> <p>6-month retention: 183 days 12-month retention: 365 days</p>	<p>Paystub or other pay documentation is required for validation of ongoing employment at 6 months (183 days), as well as at 12 months (365 days).</p> <p>Only days where the sub-project code 01 and Activity Code 33 remain open will count toward the 6 month and 12-month retention performance measures.</p>
Earned Income Increase	<p>Applies to participants who have achieved Placement.</p> <p>Individuals who have an hourly rate of pay that has increased between when sub-project code 01 was opened and the time</p>	75% of all enrolled participants who have achieved Placement have increased earnings	Programs will utilize the placement report screen found in CWDS when opening Activity Code 33 and update the rate of pay for the

	when the participant earned their 12-month (365 day) retention measure will qualify for the Earned Income Increase performance measure.		participant accordingly. The pay rate must increase during the retention period to be counted
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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 M](#) for detailed information on performance validation.

Technical Assistance

Technical Assistance (TA) will be provided throughout the year. TA can be in the form of one-on-one conversations or done in a group setting such as the EARN monthly calls. TA can cover a variety of topics including but not limited to:

- A review of performance goals or standards
- Policy or procedural training
- Collaborative roundtable discussions
- DST support

A provider may request TA at any time throughout the program year.

Monthly TANF Sample

The monthly TANF Sample is used for the following purposes:

1. To ensure program performance requirements and standards in service are supported.
2. As part of ongoing TANF audits associated with federal block grant funding.
3. To provide the Administration for Children and Families (ACF) with required information for the federal TANF Data Report.

The monthly TANF Sample is a random selection of cases that are submitted to and reviewed by the federal government. The time spent participating in work or work-related programs must be verified and documented. That documentation must be available for review upon Pennsylvania's request and retained for at least six years. All requested information and documentation must be provided complete, accurate, and in a timely manner.

Because the TANF Sample is random, there is no way to know which cases will be selected monthly. For this reason, and to assure accountability, it is important that E&T providers accurately and promptly track participant activities for each month they receive a TANF payment. For verification purposes, documentation should be kept in the case record for all hours of participation.

Monthly, E&T providers will receive an email alerting them if any of their TANF enrollees have been sampled for the target month. E&T providers will be instructed to access their DocuShare folder to obtain their list of sampled participants.

Designated E&T provider staff may access the TANF Sampling Checklist, the TANF Sampling PowerPoint training, and Instructions for accessing DocuShare in the Provider Resource File [here](#).

Contractors who do not have access to DocuShare should contact Bureau of Employment Program (BEP) at RA-TANFsample@pa.gov to request access immediately or contact your program advisor for assistance.

Program Implementation Plan

At the beginning of each program year, every provider will be required to submit a Program Implementation Plan (PIP) to BEP ([Attachment N](#)). 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 ([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

TANF participants may receive incentives, as funding permits, to promote positive behavior and/or to reinforce a student's demonstration of improved behavior such as increased or sustained attendance, goal attainment and active program participation. TANF incentives must encourage participation in a TANF activity and accomplish one or more of the four purposes of TANF:

1. Provide assistance to needy families so that children can be cared for in their own homes or in the homes of relatives;
2. End the dependence of needy parents on government benefits by promoting job preparation, work, and marriage;
3. Prevent and reduce the incidence of out-of-wedlock pregnancies;
4. Encourage the formation and maintenance of two-parent families

These supports may be given in advance of the individual's compliance with participation to promote attendance in employment and training activities and programming. If an individual does not subsequently participate or comply, the provider should evaluate if continued incentives would improve the participant's outcomes.

It is not allowable to use TANF incentives on items the individual is eligible to receive through a special allowance. TANF funds cannot be used to supplement authorized SPALs. Additionally, TANF incentives may not be issued for costs related to entertainment such as tickets to shows or sports events, meals, lodging, rentals, transportation, and gratuities.

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 O](#) for the SPAL Request Form and [Attachment P](#) 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 Q](#) for detailed LMC information.

Maximizing Participation Project (MPP) and Multidisciplinary Team Meetings (MDT)

Maximizing Participation Project (MPP) is an Extended TANF eligibility track for certain ETANF adults who:

- are exempt from RESET due to a verified temporary (more than 90 days) or permanent physical or mental disability as determined by a Medical Assessment Form (MAF) ([PA 635](#));

OR

- previously received ETANF in Deferral Hardship Track 3 and was unable to resolve barriers to participation and have demonstrated a pattern of being terminated from E&T programs with good cause due to these barriers.

Certain ETANF adults must agree to enroll with a DHS contractor who provides MPP services, cooperate with a Work Capacity Assessment (WCA), cooperate with MPP requirements, and cooperate with the MPP Service Plan if they want to receive ETANF for themselves and their family.

Cooperation with MPP requirements is mandatory for the ETANF adult who meets one of the criteria for this track. MPP focuses on the needs and barriers of the entire family. The primary goal of MPP is to help ETANF adults become economically independent and set goals by providing services and encouragement that will help the family remediate or stabilize barriers that may hinder them from achieving self-sufficiency. This is accomplished through appropriate assessments, evaluations, services, and activities.

There is no maximum number of months an ETANF adult may be eligible in MPP.

The MPP Multi-Disciplinary Team (MDT)

MPP has a team-centered approach. A team of professionals, called the Multi-Disciplinary Team (MDT) will help the individual identify and resolve barriers. The MDT will consist of members from the CAO (such as TANF Income Maintenance Caseworker (IMCW), IMCW Supervisor, and DAP worker), DHS Contractor, the ETANF adult, and any other professionals such as members of the Local Management Committee (LMC) who are able to provide professional feedback and assistance in the development of the MPP Service Plan.

The MDT will meet with the adult to develop the MPP Service Plan and determine what activities they should pursue during the time they are awaiting the WCA results. The MPP Service Plan should include activities to support the needs and assist with the removal of barriers to economic independence. This could include, but is not limited to, doctors' appointments, therapy sessions, life skills coaching, rehabilitation, ESL, ABE, HSE/GED, post-secondary education, and parenting classes.

The MPP **MDT** will coordinate with local social service agencies such as:

- Mental Health (MH) Agencies.
- Drug and Alcohol (D&A) Agencies.
- Office of Vocational Rehabilitation (OVR).
- Other social services or medical assistance agencies as appropriate, examples include:
 - Domestic Violence Agencies.
 - Housing Agencies.
 - Crisis Intervention Centers.
 - Children and Youth Agencies

The MDT should determine if participants are ready or able to increase activity hours because they have resolved or stabilized their barriers sufficiently, or have minimal barriers, and do not require extensive interventions. MPP participants who need the support of a ramp-up to employment can be referred to the appropriate **DHS** contractor for Employment and Training activities.

[See Attachment S-MDT](#)

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

