

# Operations Memorandum - Employment & Training

## OPS120601

June 5, 2012

**SUBJECT:** Good Cause Changes  
**TO:** Executive Directors  
**FROM:** Richard Wallace, Acting Director, Bureau of Operations

### Purpose

To inform CAOs of changes to Good Cause (GC) policy effective June 4, 2012

### Background

Currently individuals may be granted GC from RESET participation requirements, including GC due to transportation-related issues. The changes in this OPS promote the message of personal responsibility and self-sufficiency through a "work first" approach.

### Discussion

A regulations change related to good cause for failure to comply with RESET requirements was published 04/12/2012 in the *Pennsylvania Bulletin*. The regulation eliminated some good cause reasons and introduced some changes to the way CAOs determine GC. With the elimination of certain GC reasons, CAOs may now take a more discerning approach when reviewing an individual's circumstance in determining and granting GC for non-compliance. In addition to summarizing regulatory changes to good cause, the purpose of this OPS memo is to emphasize that even when an individual establishes good cause based on transportation related issues, he or she is nonetheless usually capable of doing an independent job search or another work-related activity unaffected by transportation resources. For these individuals, the CAOs must update the AMR to reflect these required activities and the client's responsibility to provide weekly verification to the CAO.

### Summary of Good Cause Changes

➤ Deletion of the provision that requires CAOs to give individuals "the benefit of the doubt" when reviewing the individual's GC reason for failure to comply with the participation requirement. The CAO must consider all facts and circumstances and should continue to evaluate GC when non-compliance occurs. Although an explanation may be presented in support of the failure to meet participation, it may not necessarily be considered a good cause reason.

**Example:** Sally indicates she doesn't have child care. She has indicated this explanation in the past. Sally was given the brochure on alternate child care arrangements and provided with information on her responsibility to contact the local CCIS to make child care arrangements. Sally has made no attempt to contact CCIS. The need to secure child care is on her AMR. This is not GC.

➤ Good cause as a reason for quitting or refusing employment that is sporadic, seasonal or temporary is eliminated. When an individual quits a sporadic work relationship that does not hold a reasonable possibility for permanent, full-time work this is no longer good cause.

**Example:** Sally is working for ABC Temps part-time. She quits ABC Temps because they cannot offer her jobs that will lead to full-time employment. This is not good cause.

➤ Good cause for rejecting a job offer that would result in a loss of income is eliminated. This means a client cannot reject a job offer because it will result in a net loss of cash income to the budget group of the RESET participant. Net loss of cash income results if the budget group's gross income, less actual work-related expenses, plus a cash assistance payment for which the budget group remains eligible, is less than the cash assistance previously received. The actual work-related expenses include mandatory payroll deductions as well as the actual cost of the child care, cost of care of an incapacitated individual living in the same home and transportation.

**Example:** Sally is offered a job that starts at minimum wage. She refuses the job because she says she does better by staying on welfare. This is not GC for refusing the job offer.

These changes are consistent with the goal to promote the “work first” approach to employment and training, and the idea that establishing a work history is critical to economic self-sufficiency. Developing a work history and gaining work experience assists individuals to move toward self-sufficiency. In addition, the CAO should explain that any bona-fide offer of employment must be accepted.

➤ A new provision that states DPW may require verification of the good cause reason has been added.

**Example:** Sally's child needed emergency medical care. She provided the paperwork to support her good cause claim from the hospital that was requested by the CAO. This is a GC reason.

➤ Although DPW offers SPALs for transportation, transportation issues continue to provide challenges to an individual's ability to meet participation requirements. When transportation is a barrier, the CAO should approve an individual's participation in an independent job search from home or some other activity that is not impacted by the lack of transportation.

**Example 1:** Sally has exhausted the annual transportation limit and is indicating that she is not able to continue at the EARN program because she is not receiving a SPAL. She is terminated from the EARN with good cause. Sally will be required to participate in a job search or other activity from home instead. Sally must provide verification of the job search to the CAO weekly. Transportation issues are addressed on the AMR. Sally is trying to work out a car pool arrangement with family members to continue to seek employment.

**Example 2:** Sally has been referred to EARN and plans to ride the bus. Due to a snow storm, Sallie arrives at the bus stop late, missing the bus. She has no other transportation and is unable to get to the EARN program on time. Since the snow storm prevented Sallie from getting to the bus stop on time, she may be granted good cause and continue at the EARN center. If a pattern of missing the bus continues Sallie's transportation issues will need to be reviewed and good cause re-evaluated.

## **Next Steps**

1. If you have any questions, contact 717-787-1302.
2. Retain this Operations Memorandum until the information is incorporated into the CAH 135 and SNAP 535 Handbooks.