**DATE: August 12, 2021**

**OPERATIONS MEMORANDUM #21-08-01**

**SUBJECT:** Updates to the Education Leading to Employment and Career Training (ELECT) Program

**TO:** Executive Directors

**FROM:** Paula Copeland

 Acting Director

 Bureau of Operations

**PURPOSE**

 To inform the County Assistance Offices (CAO) of updates to the ELECT program, expand on the procedure for the Application for Family Works Services (PA 1720), and clarify current ELECT policy.

**BACKGROUND**

The principal goal of the ELECT programs is to assist eligible expectant, custodial, and noncustodial parents of all genders under the age of 22 break the cycle of welfare dependence by remaining in school, maintaining regular attendance, obtaining a high school diploma or High School Equivalency (HSE) credential, and securing post-graduation employment, education, or training that will help them become successful parents and self-sufficient adults. ELECT provides participants with pregnancy prevention information, guidance, and services to reduce the incidence of secondary youth pregnancies. They provide services to promote the importance of healthy parental relationships and encourage the significance of fathers in their children’s lives.

 ELECT services are provided to Temporary Assistance for Needy Families (TANF) cash assistance recipients or to those not currently receiving TANF cash assistance benefits but eligible for the Family Works (FW) initiative. ELECT referrals can be initiated through the CAO or the ELECT provider. ELECT providers rely on school and community resources, such as school nurses, guidance counselors, teachers, doctors’ offices, and nonprofit organizations, to identify expectant and parenting students. Participants must attend, or be interested in attending, secondary education at an accredited institution served by one of the 29 ELECT providers.

 The Department of Human Services (DHS) and the Pennsylvania Department of Education (PDE) collaborate to oversee the 29 Intermediate Units (IUs) and Local Education Agencies (LEAs) that administer these services across Pennsylvania.

**DISCUSSION**

**ELECT TANF Eligibility and Processing**

The CAO will discuss the ELECT program with eligible TANF applicants and recipients who would benefit from ELECT services. Employment and Training programs such as Employment Advancement and Retention Network (EARN) and Keystone Education Yields Success (KEYS) may also identify TANF recipients who may be eligible for ELECT. EARN and KEYS will coordinate with the CAO and ELECT provider to have the CAO refer eligible individuals to ELECT.

When the ELECT provider identifies a potentially eligible ELECT participant, they use the Preliminary Screening process in CWDS to determine if a prospective participant is receiving TANF. If the individual is receiving TANF, the ELECT provider will directly request an electronic referral from a CAO designated staff member.

 For a TANF recipient to be eligible to participate in the ELECT program, they must be:

* an Eligible ('E') member on a TANF case;
* an expectant or parenting individual;
* 21 years of age or younger; and
* attending, or interested in attending, secondary education at an accredited institution served by ELECT.

**NOTE:** Pregnancy and parental status of minors, including that of putative fathers and noncustodial parents, receiving TANF benefits on a specified relatives TANF budget do not need to be verified to be referred to ELECT unless questionable.

ELECT participants under the age of 18 and receiving TANF cash assistance benefits on a specified relatives TANF budget are not required to complete an Agreement of Mutual Responsibility (AMR) to be referred to and participate in ELECT. ELECT participants age 18 or older or under age 18 and receiving TANF cash assistance benefits on their own TANF budget must have an AMR completed. The AMR will be completed for participation in high school or HSE and contain the contact information of the ELECT program they will attend. [**Attachment 1 ELECT Program List**](https://pagov.sharepoint.com/sites/DHS-OIM/Attachments/Attachment%201%20OPS%2021-08-01-%20ELECT%20Program%20List.xlsx) provides the ELECT program information. A copy of the AMR must be submitted to the ELECT program. Failure to comply with the ELECT program will not result in a sanction. A student’s compliance is based on their participation in the high school or HSE program, not the ELECT program. If the CAO can verify that the individual is participating satisfactorily in high school or HSE no sanction would be imposed.

The CAO will update the ELECT participant’s ETP code to 60 for non-exempt TANF participants or 61 for volunteers under the age of 18. An electronic ELECT referral will be submitted by creating a 'Y' project on the ETP Project Enrollment screen.

**Family Works Eligibility and Processing**

The CAO will discuss the FW program with potentially eligible Supplemental Nutrition Assistance Program (SNAP) and Medical Assistance (MA) recipients at application or renewal. SNAP and MA recipients who could benefit from the services ELECT provides will be informed of their ability to volunteer to participate.

When the ELECT provider completes the Preliminary Screening Process for potentially eligible participant and the individual is not receiving TANF,ELECT will submit a PA 1720, [**Application for Family Works Services (Attachment 2)**,](https://pagov.sharepoint.com/sites/DHS-OIM/Attachments/Attachment%202%20OPS%2021-08-01-%20Application%20for%20Family%20Works%20Services.pdf) to the CAO for FW eligibility determination for individuals not identified as TANF recipients. ELECT can serve a participant under Preliminary Screening from the date the application is signed through the date the CAO determines eligibility for FW.

For individuals to be eligible for ELECT through the FW initiative they must be:

* pregnant or parenting; and
* 21 years of age or younger; and
* ineligible for/not receiving TANF cash assistance benefits; and
* have personal gross earned income under 235% of the FPIG.

**NOTE:** Pregnancy and parental status, including that of putative fathers and noncustodial parents, does not need to be verified unless questionable.

When the CAO receives an Application for Family Works Services they must:

* Check it for completeness to ensure it is signed and has identifiable information;
* Date stamp and register the application as a 'provider application' on the date of receipt;
* Narrate receipt of the application, individual details, the service requested, and any pending verification not received at application; and
* Scan the application and supporting documentation into imaging.

**NOTE:** The CAO must not register other benefits with the FW application.

If additional verification is required to process the FW application, the CAO will send a PA 253 to the provider and client outlining what is needed to process the application and allow the individual at least 15 calendar days to provide the documentation.

Once all verification is obtained the application can be processed. When processing the case in eCIS, the Income Maintenance Caseworker (IMCW) must include:

* The applicant (pregnant or parenting) requesting ELECT services
* The applicant’s children (if applicable)
* The legal spouse (if applicable)
* The co-parent (only if they are residing in the household)

**NOTE:** Additional household members, including the parent(s) and sibling(s) of the pregnant or parenting individual requesting ELECT services must not be included in the FW application or budget group.

 FW clients will be opened with an 'SC' category code, Cash ETP code 70, and a referral to ELECT will be completed by creating the 'Y' project. The 'SC' Category Code will be opened for all ELECT individuals not receiving TANF, even if they are receiving SNAP, MA or SNAP and MA. [**Attachment 3 Family Works Processing Instructions**](https://pagov.sharepoint.com/sites/DHS-OIM/Attachments/Attachment%203%20OPS%2021-08-01-%20Family%20Works%20Processing%20Instructions.docx) provides detailed directions on opening the 'SC' category.

 The CAO must make a decision on eligibility within 30 calendar days of the date stamp of the application. If the provider or client fails to provide the necessary verification by the requested due date, the CAO will allow up to 30 calendar days from the application date stamp to receive the verification before denying the FW application. After processing the FW application, a system notice is sent to the applicant; however, a manual notice must be sent to the ELECT provider. All case actions and determinations must be narrated by the IMCW.

FW is authorized for 12 months from the date stamp of the application. A new FW application is not required for renewal. The participant is responsible for reporting any changes to household composition and earned income that could impact a participant’s ongoing eligibility for FW. The ELECT program can assist the participant in reporting these changes. The IMCW must set a manual alert for 12 months after the authorization date for renewal.

**ELECT Data Entry**

 ELECT providers are responsible for tracking and data entering the participation hours of all ELECT students. Students meeting satisfactory progress in their secondary school or HSE program will have their hours deemed to their full hourly participation requirement by participating in ELECT and tracked under Activity Code (AC) 13: High School/HSE. All activities must be recorded weekly, including employment hours. The ELECT program is required to data enter all participants’ education and training hours by the 15th of the month following the month of participation. ELECT programs will also be responsible for tracking employment hours for participants age 18 and older, under Activity Code (AC) 33: Unsubsidized Employment. Employment hours are required to be data entered by the last day of the month following the month of participation.

**'K' Closings**

 When a participant enrolled in ELECT has a corresponding budget or case closure in eCIS, the Employment and Training Project screen will show a term code ‘K’. If their budget reopens in eCIS within 45 days, the ‘K’ term code should lift systematically. If the 'K' does not lift systematically, a ServiceNow ticket should be submitted.

 How to address TANF cash or SC budget closures:

1. If the client was open TANF and the TANF closed due to pending verifications, semi-annual, or annual reviews that have since been received, evaluate the student for continued ELECT program eligibility and reopen TANF benefits. If benefits reopened in eCIS the term code ‘K’ should system lift systematically. If the 'K' does not lift systematically, a ServiceNow ticket should be submitted.
2. If the client was open TANF and is now receiving SNAP, MA, or SNAP and MA, the CAO will need an Application for Family Works Services (PA 1720) from the provider. The CAO will be required to determine eligibility and process the FW application as described above.
3. If the client reaches their 12-month eligibility for FW under the 'SC' category and they continue to participate in ELECT, the CAO may use the FW application on file to reopen the 'SC' budget. If the 'K' does not lift systematically, a ServiceNow ticket should be submitted.
4. If the client left the household under which the ‘Y’ project was open and wishes to open their own budget, the Family Works application on file, as well as any updated client information, can be used to determine continued ELECT eligibility.

**Special Allowances**

ELECT students who receive TANF Cash Assistance may be eligible for special allowances (SPALs). A TANF recipient’s eligibility for SPALs is not determined based on their participation with ELECT. It is their participation in the allowable TANF activity of high school or HSE that makes them eligible for the SPAL.

Family Works ELECT students are not eligible for special allowances, regardless of age, because they do not receive TANF Cash Assistance. Family Works ELECT students who receive SNAP are not eligible for SNAP SPALs as they are not considered to be SNAP Employment and Training participants.

**NEXT STEPS**

1. Share this memorandum with appropriate staff.
2. This OPS Memorandum obsoletes OPS Memorandum #16-07-03 and Policy Clarifications EPP-18744-135 and 18300.
3. Questions about this Memo or the ELECT program can be directed to the Bureau of Employment programs at RA-PWBEPELECTPOLICY@pa.gov.

**ATTACHMENTS**

Attachment 1: [ELECT Program List](https://pagov.sharepoint.com/sites/DHS-OIM/Attachments/Attachment%201%20OPS%2021-08-01-%20ELECT%20Program%20List.xlsx)

Attachment 2: [Application for Family Works Services](https://pagov.sharepoint.com/sites/DHS-OIM/Attachments/Attachment%202%20OPS%2021-08-01-%20Application%20for%20Family%20Works%20Services.pdf)

Attachment 3: [Family Works Processing Instructions](https://pagov.sharepoint.com/sites/DHS-OIM/Attachments/Attachment%203%20OPS%2021-08-01-%20Family%20Works%20Processing%20Instructions.docx)