

DATE: July 27, 2022

OPERATIONS MEMORANDUM #22-07-05

SUBJECT: New Community Service and Work Experience Verification Forms for Road to Economic Self-Sufficiency Through Employment and Training (RESET)

TO: Executive Directors

FROM: Robert Patrick
Acting Director
Bureau of Operations

PURPOSE

To inform County Assistance Offices (CAOs) of the release of two new forms for RESET and provide direction for their use.

BACKGROUND

Pennsylvania Department of Human Services (DHS) is committed to delivering human-centered services that ensure families are provided with opportunities, skills, knowledge, and experiences on their journey to family sustaining employment. DHS has released two new exception reporting verification forms for CAOs and Employment & Training (E&T) contracted programs to streamline verification processes for state and federal reporting purposes.

DISCUSSION

Community Service and Work Experience are allowable, unpaid activities that provide opportunities for individuals who are not ready for immediate workforce attachment to obtain valuable skills, experience, and knowledge necessary to succeed in future employment.

Exception Reporting

The new verification forms rely on a mechanism called exception reporting. Exception reporting identifies performance metrics where actual outcomes significantly differ from expectations. For RESET participation, a significant change is defined as a change that impacts the total [participation requirements](#) over a calendar month. See **Attachment 3** – Significant Change Examples.

Community Service Verification Form (PA 1979)

Pennsylvania defines community service programs as structured programs and embedded activities in which an individual performs unpaid work for the direct benefit of the community. Community service programs are 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.

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.

Work Experience Verification Form (PA 1980)

Pennsylvania defines work experience as a work activity performed in return for a public cash grant (i.e., ongoing TANF benefit) that provides the individual with an opportunity to acquire the general skills, knowledge, and work habits necessary to obtain and maintain employment. Unpaid pre-apprenticeships, unpaid entrepreneurship, unpaid apprenticeships, and unpaid internships are examples of work experience. Work experience could also include the work associated with refurbishing publicly assisted housing.

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.

Fair Labor Standards Act (FLSA) Calculation and Deeming

Both Community Service and Work Experience are subject to FLSA calculation and deeming. Individuals cannot participate more hours than allowed by the FLSA. DHS determines the participant's allowable work hours using the method outlined in Cash Assistance Handbook (CAH) [135.213](#) Calculating the Number of Hours for Community Service and Deeming Hours for Community Service. Additionally, individuals meeting their maximum allowable FLSA hours in *community service or work experience* must be deemed to meet their core federal requirement.

Instructions For Completing Pa 1979 And Pa 1980 Forms

The CAO or E&T contractor will:

1. Complete the top section of the appropriate form, including the allowable monthly hours using the FLSA Calculation in CAH [135.213](#).

| MAIL, EMAIL, OR FAX THIS FORM TO: | CAO / CONTRACTOR USE ONLY |
|---|---|
| CAO or Contractor Name Address Line 1 Address Line 2 City, State, ZIP FAX: (555) 555-5555 or EMAIL: <insert CAO or contractor email> | CO / REC: ALLOWABLE MONTHLY HOURS: |

2. Submit the appropriate form to the community service sponsor or work experience site manager to complete Sections I, II, and III.
3. Request the completed form be returned within 10 days of the activity begin date.
4. Once the completed form is received, the CAO and/or contractor will record the participation hours as verified on the form, with any applicable deeming, in eCIS or CWDS each week *unless* the community service sponsor or work experience site manager reports a significant change in participation. A significant change will prompt the CAO or contractor to enter updated actual hours of participation, with any applicable deeming, in eCIS/CWDS.

Changes To Participation

If an individual stops attending or has a significant change in participation, the community service sponsor or work experience site manager can choose to:

- Resubmit the appropriate form with Section IV completed reporting the actual end date or other changes in participation.
- Contact the CAO or contracted program with the updated information.
 - If collateral contact is made, the CAO will update Section IV and rescan the form into imaging.

NOTE: It is the responsibility of the community service program sponsor or work experience site manager to report changes in participation within 10 days of the change.

If the end of any activity impacts E&T program enrollment and participation expectations as outlined on the Agreement of Mutual Responsibility (AMR), the cash recipient and their situation should be addressed at or between Direct Service Team meetings with the CAO and contracted program.

NEXT STEPS

1. Share and review this information with appropriate staff members.
2. Direct questions regarding this Operations Memorandum to your Area Manager.
3. All previous cash E&T verification forms for the explicit purpose of verifying community service and work experience are discontinued.
4. This Operations Memorandum is in effect until further notice.

ATTACHMENTS

Attachment 1 – [Community Service Verification Form \(PA 1979\)](#)

Attachment 2 – [Work Experience Verification Form \(PA 1980\)](#)

Attachment 3 – [Significant Change Examples](#)