

**DATE:** February 11, 2022

**OPERATIONS MEMORANDUM #22-02-01**

**SUBJECT:** COVID-19 Employment and Training (E&T) Procedures

**TO:** Executive Directors

**FROM:** Robert Patrick  
Acting Director  
Bureau of Operations

**PURPOSE**

To provide guidance and procedures for E&T as the Commonwealth begins to lift COVID-19 mitigation measures and reopen offices to public access

**BACKGROUND**

The Commonwealth has begun lifting mitigation measures in Pennsylvania though municipalities and school districts may continue to implement stricter mitigation efforts. At this time, [Allegheny](#), [Delaware](#), and [Philadelphia](#) counties have provided additional guidelines. County Assistance Offices (CAOs) must discuss local guidelines with E&T program providers to ensure safety. Pennsylvania encourages participants and E&T programs to follow [CDC safety guidance](#).

**DISCUSSION**

CAOs reopened July 12, 2021, with limited staffing, for walk-in client traffic.

E&T programs will follow local, state, federal, and organizational guidelines for resuming in-person operations. The CAO must discuss these plans with local E&T programs.

The CAO will follow the most updated policy as indicated in the appropriate benefit handbook, operations memorandum, and policy clarifications to ensure individuals understand what E&T programs and options are available to support their personal education, training, and employment goals at no-cost. CAO staff may refer to [E&T resources](#) for more information about local E&T options.

## **Referrals, Enrollments, and Terminations**

The options of remote E&T participation and distance learning are available for consideration by the E&T program upon request by the participant, or when an individual's circumstances make it the best fit. This includes, but is not limited to, external factors, such as physical programming location closings (due to inclement weather, illness, COVID etc.) and lack of transportation options.

The CAO will complete the Job Readiness Assessment and Agreement of Mutual Responsibility (AMR) for mandatory and volunteer TANF or Refugee Cash Assistance (RCA) participants or the Employment Development Plan (EDP) for SNAP-only participants who volunteer to participate in an E&T program. The AMR or EDP will be transmitted to the E&T program along with the electronic referral from eCIS. The individual will be referred to the appropriate E&T programming per [CAH 135.11, Program Referral Chart](#) for TANF clients and [SNAP Handbook 535.11](#) for SNAP-only clients.

**REMINDER:** Per SNAP Handbook 536, Appendix A, the Able-Bodied Adult without Dependent (ABAWD) time limit remains waived statewide. No SNAP-only recipients are currently required to work or participate in an E&T program to maintain eligibility for SNAP benefits.

**All contracted E&T providers in the commonwealth are expected to be able to provide remote E&T activities**, services, and case management to individuals throughout the reopening process and beyond. **Because contracted programs are responsible to provide activities remotely or in-person, the CAO will not use good cause code 87 related to COVID-19 unless there are complete facility closures.** The CAO must refer individuals to E&T programs, at which point the E&T provider will assess the individual's technology capacity and address any such needs prior to enrollment, as discussed below.

**Remote E&T participation** can be defined as using technology such as a telephone, computer, or other electronic device to engage in unpaid work-related activities. Remote participation also includes the provision of paper packets, workbooks, and assignments when internet access or a digital device is not an option or participant's preference. This also refers to a blended approach of remote and in-person activities.

**Distance learning**, including blended learning (hybrid of online and in-person classes), is remote participation in a vocational educational activity via an accredited education institution or DHS contracted provider. The availability of local, in-person vocational-education opportunities does not prevent an individual from participating in distance learning.

**Lack of internet or technology must not prevent an E&T referral.** The E&T program is responsible to find methods of providing and maintaining individuals in E&T activities and ensuring all necessary services and technologies are in place to support participation. Individuals engaged in remote E&T or distance learning may provide their own internet access **or** internet access may be provided by the accredited educational institution or the E&T program. E&T contractors will continue to assess each participant's circumstances and ability to participate in remote E&T services. There are additional resources and options for individuals struggling with technology needs; please review Participant Resources ([Attachment 1](#)).

The process for data entry on an AMR or EDP will be the same whether the individual is participating in-person or remotely. The AMR ([Attachment 2](#)) and EDP will include all information to ensure the participant is able to contact the program including program name, case manager (if known), phone number, address, and email address.

When completing an AMR during a phone interview at application, individuals that indicate they may not be able to receive or return the AMR timely may be granted 30 days Good Cause to sign and return the AMR. The Good Cause is not for RESET, only for delayed return of the AMR. **E&T program referrals must still be completed within seven days of cash opening.** The unsigned, completed AMR must be provided to the E&T program at the time of the referral. This will allow the contractors to assist with obtaining the signature for the AMR when the individual attends the program if the signed AMR has not been received at that time.

All E&T programs will perform outreach to all referred individuals prior to enrollment. The E&T program will discuss available options for local participation, document the participant's choice, and assess the individual's need for technology available through special allowances (SPALs) and/or local resources available through the E&T program, to support participation. When the assessment is completed and the E&T provider has assisted the individual in securing the technology needed to support participation, the E&T program will enroll the individual, complete additional assessments, and create the Individualized Employment Plan (IEP). If, despite the E&T provider's best efforts, the individual's technology needs cannot be met, the individual should be granted good cause, until such time as these needs can be met.

E&T programs will conduct outreach for current enrollees who have not responded to the E&T staff for three consecutive days. Individuals who do not respond should be logged, discussed with CAO (via email, telephone call, or at DST), and terminated by the E&T program with the appropriate CWDS code when the E&T program and CAO agree that termination is appropriate.

**NOTE:** Failure to meet full participation requirements, when an individual is otherwise making a good faith effort to participate, is not a reason to terminate. Good cause may be provided for some participation requirements when needed.

Upon termination from an E&T program, once the ASAP alert is received, the CAO will begin the compliance review process and be evaluated for good cause. Please see **Reviewing for Good Cause** in Cash Assistance Handbook (CAH) [135.7 Noncompliance with RESET Requirements](#).

If the E&T program or participant asserts there is no participation option available, the CAO must notify the Bureau of Employment Programs (BEP) via e-mail at [RA-PWBEP.TANF@pa.gov](mailto:RA-PWBEP.TANF@pa.gov). The email should provide the case details and the E&T program stating there is no participation option available. BEP will provide guidance to the CAO and E&T program.

Pursuant to Act 73 of 2021, normal sanction policy is suspended until further notice. Mandatory individuals must have a compliance review and AMR updated prior to being rereferred to E&T programs. **No sanctions will be started or implemented until further notice and no instances of noncompliance will be considered for sanction.**

**NOTE:** The CAO must review for potential good cause or exemptions prior to referring mandatory participants to E&T programs. This includes a review of COVID-19-related issues that may be impeding participation that are out of the individual's control.

### **Reviewing for Good Cause**

As noted above, individuals who are enrolled to participate in E&T programming and fail to do so for three or more consecutive days, AND who do not respond to outreach will be terminated from the E&T program if the CAO and E&T program mutually agree it is the most appropriate action.

Once the CAO receives the ASAP 156 alert, the CAO will complete a compliance review in accordance with [CAH 135.7](#). **Reminder:** Once good cause is applied, that instance of noncompliance ends. Good cause may be granted without verification unless questionable. Exemptions must be verified. If verification is requested for good cause or required for an exemption, send a PA 253 with an appropriate due date and verification based on the type of good cause or exemption.

It is important to note that the CAO must NOT grant blanket good cause for failure to participate. Good cause must be reviewed and granted on a case-by-case basis. See [CAH 135.4 Good Cause](#) for a more extensive list of good cause codes (GC) and information.

If , following CDC guidance or the advice of any licensed healthcare professional, a participant must quarantine, isolate, or care for a household member ill with COVID-19, the CAO should use GC 53. If the situation is expected to last more than a few days,

the CAO should review for an exemption by providing the appropriate form (PA 635 or PA 1820) and allow for 30 days for completion by a licensed, medical professional. The GC 53 may be extended beyond 30 days if an appointment cannot be made within the 30-day window. Participants should be encouraged to continue to return completed department forms by uploading them to myCOMPASS PA mobile app, fax, or email.

### **Post-Secondary Education Six-Month Extensions**

The CAO will follow current policy for obtaining BEP approval for six-month extensions. Students participating in post-secondary education, who were not able to complete a full semester due to COVID-19 may be reviewed for extension eligibility based on the last full semester that was completed. If no last full semester exists, good cause will be granted to allow the individual to continue to participate for one full semester. Once a full semester is completed, BEP will use that information to determine the appropriateness of future extensions.

### **Tracking the Impact of COVID-19**

BEP is required to monitor the direct and indirect impact of COVID-19 on E&T participation. Please continue to use the [spreadsheet](#) to track individuals who are granted good cause specifically due to COVID-19. Click “enable content” and save the file to your local hard drive (do not edit the document in the cloud) once opened. BEP thanks all CAO staff for continuing to be vigilant with the collection of this information.

**NOTE:** Do not log individuals who were granted good cause for reasons not related to COVID-19 on the tracking spreadsheet.

Capture all information as applicable on the spreadsheet as well as any notes or information the CAO would like to provide. Save the file once data entry is completed. Examples of cases that should be logged:

- Parent is unwell and believes they were exposed to COVID-19 – **GC 53**, PA 635 sent
- Grandparent lives in the home and is believed to be sick with COVID-19 – **GC 53**, PA 1820 sent
- Childcare center is closed or has no openings due to COVID-19 outbreak and parent cannot participate – **GC 57**
- Child(ren)’s school closed due to COVID-19 outbreak and parent cannot find childcare to participate – **GC 57**

CAO staff will submit the spreadsheet to their respective staff assistant by clicking “File” then “Share” and inputting an email address. Completed spreadsheets are due to BEP by close of business on the last Friday of each month (unless that Friday is

a holiday, then please submit the following Monday). Please retain data from past cases on each monthly report.

**NEXT STEPS**

1. Share this memorandum with appropriate staff.
2. This memorandum superseded all previous E&T COVID-19 guidance.

**ATTACHMENTS**

Attachment 1: [Participant Resources](#)

Attachment 2: [AMR Example](#)