

DATE: September 18, 2020

OPERATIONS MEMORANDUM #20-09-04

SUBJECT: Second and Subsequent Training Policy

TO: Executive Directors

FROM: Inez Titus
Director
Bureau of Operations

PURPOSE

To inform the County Assistance Offices (CAOs) of second and subsequent training policy changes effective July 1, 2020.

BACKGROUND

As per Cash Assistance Handbook 135.212, both Cash and SNAP recipients requesting a second training are currently under the following restrictions:

The CAO will not approve a second training for individuals receiving TANF or SNAP-only benefits who: want to pursue an occupation not listed on the Labor and Industry's High Priority Occupations List, or have completed all course work associated with a particular occupational skills program; live in an area where jobs are available in the profession in which they received the training or certificate.

Exceptions to this requirement can be granted when an individual is unable to become employed in that occupation due to changes in physical or mental status, an individual has a conviction record that prohibits employment in that field, when changes in the labor market make it unlikely that employment can be found in that occupation, or if the second training is a continuation of the same field, i.e. CNA to LPN, and will lead to employment.

Excluded from this policy are individuals who receive certification of a skill through a short-term skills credentialing program, such as the Work Certified Program or Worldwide Interactive Network (WIN) for WorkKeys, that is closely linked to job search training activity.

DISCUSSION

Due to changes in contracted programs beginning July 1, 2020, the Second Training Policy for Cash and SNAP participants has been updated.

Second and Subsequent Training Policy

For the purposes of second and subsequent training policy, the CAO will not consider the following to be countable past trainings:

- past trainings that were not supported under Pennsylvania's TANF or SNAP E&T programs;
- completion of high school, a high school equivalency program, or an adult basic education program;
- completion of an English as a second language program;
- completion of a career readiness program that provides only general work skills training, including but not limited to, WorkKeys®; or
- any occupation skills program where all requisite coursework was not completed; or
- any occupation skills program where all requisite coursework was completed but individual was unable to obtain the required certificate, licensure, or industry credential

Requests for training do **not** need to be submitted to the Bureau of Employment Programs (BEP) when the individual's training history is limited to the above scenarios.

The CAO will consider a request to pursue a progressively higher credential in the individual's field (e.g. CNA to LPN) to be a continuation of the prior countable training, rather than a new countable training. Requests for continuation do **not** need to be submitted to BEP for approval.

Obtaining BEP Approval

Requests for second and subsequent countable trainings must be submitted to BEP for approval. BEP will approve the request when the individual is pursuing an occupation listed on the local Workforce Development Area's [High Priority Occupation \(HPO\) list, as published by the Department of Labor and Industry](#); AND

- An individual is unable to become employed in their chosen field due to changes in physical or mental health status; OR
- An individual no longer has the skill level or aptitude necessary to find employment in their chosen field; OR
- An individual has a background that now prohibits employment in that field; OR
- An individual is unlikely to find employment in that occupation in the area in which they reside that will end the individual's dependency on TANF and SNAP benefits.

Example 1: A TANF recipient who received a cosmetology license prior to the receipt of TANF benefits requests to start schooling to become a CNA. This is an initial training request and does not require BEP approval. The individual is able to participate in the training.

Example 2: An individual who received their CNA license while a TANF recipient and is now receiving SNAP only wishes to continue her education to become an LPN which will increase her wage significantly. This is not a second training because the individual is continuing to pursue a progressively higher credential in the same field; this is considered a continuation of the first training and does not require BEP approval.

Example 3: An individual graduated from college in 2007 with an associate degree in Performing Arts while receiving TANF benefits. They cannot find work in their field of study. They are now receiving SNAP benefits and wish to seek further education to improve employability. The individual wishes to pursue a non-specific Liberal Arts degree. This second training request must be submitted to BEP.

Example 4: A TANF recipient receives a cosmetology license and obtains a job paying \$10 per hour, which is enough to close the TANF budget, but not the SNAP budget. They use five months of vocational education time obtaining this credential. The recipient then requests to pursue a CNA. The CAO submits the second training request to BEP. BEP approves the request, because the individual was unable to find employment in the field paying a high enough wage to close the SNAP budget.

Example 5: The individual described in Example 4 is later charged with an offense that causes them to no longer be able to work in the medical field, reapplies for SNAP only, and now wishes to pursue a CDL. This subsequent training request must be submitted to BEP.

Example 6: An individual, receiving ETANF benefits, obtains their certificate for cosmetology while originally a TANF recipient. The only hairstylist in town shuts their doors and the individual cannot find employment. The recipient wishes to open their own shop and wants to take business class at the local community college. This subsequent training request must be submitted to BEP.

NOTE: Post-graduate (for example, a master's degree) vocational education activities are *not* allowable activities for TANF or SNAP E&T participants regardless of DHS support in past trainings.

Submitting Second and Subsequent Training Requests

All second and subsequent training requests should be submitted to the BEP.

- For Cash recipients contact: RA-PWBEP.TANF@pa.gov.
- For SNAP recipients contact: RA-PWBEP.SNAP@pa.gov

Please include case record information and pertinent details regarding the individual and their previous education. Please allow two business days for a response.

NEXT STEPS

1. Review this Operations Memorandum with appropriate staff.
2. These policy changes are effective when published.
3. This Operations Memorandum obsoletes EPP587135.
4. TANF E&T questions about this Memorandum can be directed to the Bureau of Employment Programs, TANF policy, via email at RA-PWBEP.TANF@pa.gov.
5. SNAP E&T questions about this Memorandum can be directed to the Bureau of Employment Programs, SNAP policy, via email at RA-PWBEP.SNAP@pa.gov.