



**DATE:** August 11, 2020 **September 30, 2020**

**OPERATIONS MEMORANDUM #20-08-01**

**SUBJECT:** **Revised** - Changes to Education Policy

**TO:** Executive Directors

**FROM:** Inez Titus  
Director  
Bureau of Operations

**PURPOSE**

To inform the County Assistance Offices (CAOs) of educational activity policy changes.

**BACKGROUND**

**High School Equivalency (HSE), English as a Second Language (ESL),  
and Adult Basic Education (ABE)**

State statutes and regulations indicate cash recipients cannot use attendance in a secondary school or general equivalency program as a core activity to meet required hours if they are 22 years of age or older. Cash recipients under 22 are permitted to participate in these activities as core hours of participation. Federal guidelines state High School Equivalency (HSE) and/or General Equivalency Diploma (GED), English as a Second Language (ESL) and Adult Basic Education (ABE) educational activities must be embedded into a work activity or be part of a career pathway program (such as, but not limited, to bridge programming) to count as core activities.

Supplemental Nutrition Assistance Program (SNAP) policy currently allows participation in HSE, ABE, and ESL as approved SNAP employment and training activities. There are no changes to the current SNAP policy regarding the allowability of these activities.

**Post-Secondary Vocational Education Policy**

Vocational education is defined as specific training provided by a contracted employment and training contractor, accredited educational provider, or accredited Internet-based educational institution intended to prepare an individual for a specific occupation. Current state and federal vocational education participation policy limits individuals to count 12 months of core vocational education participation hours in a lifetime. Under Keystone Education Yields Success (KEYS) Expansion, Vocational

Education time is available for cash and SNAP recipients attending one of PA's 14 community colleges, 14 state-owned universities, or certain career and technical schools. Those recipients may utilize 24 months of vocational education with the possibility for six-month extensions thereafter, if they meet all extension criteria.

### **Extended TANF (ETANF) Education Policy**

Current policy states individuals participating in an approved vocational education program not identified as a KEYS Program Institution when they reach 1830 days on Temporary Assistance for Needy Families (TANF) may continue in that activity until the end of the semester or term. ETANF individuals are not able to initiate vocational education activities or have an education activity approved on their Agreement of Mutual Responsibility (AMR) after reaching 1830 days.

### **DISCUSSION**

A lack of general education, English proficiency, adult basic education, and post-secondary training/education have been identified as major barriers to recipient employability and ability to obtain jobs with family-sustaining wages. The policy changes in the sections that follow aim to improve client access to education and training in order to improve employability.

### **High School Equivalency (HSE), English as a Second Language (ESL), and Adult Basic Education (ABE)**

All cash assistance recipients, regardless of TANF/ETANF status, without a high school diploma or GED, regardless of age, may pursue HSE, (which includes GED exam, High School Equivalency Test (HiSET), or Test Assessing Secondary Completion (TASC)). All cash assistance recipients in need of ESL may pursue English language training. All cash assistance recipients in need of ABE may pursue basic adult education. In all instances, recipients will receive good cause to waive the requirement to fulfill additional core or non-core hours and activities. The CAO will enter good cause code 74 into the good cause/tracking code field in eCIS for individuals participating or interested in participating in HSE, ESL, or ABE.

If a cash assistance recipient expresses interest in pursuing HSE, ESL, or ABE prior to enrollment with the E&T contractor, an AMR will be created explaining barriers and a referral made to the appropriate E&T contractor.

When an individual is already enrolled with an E&T contractor and expresses interest in participating in HSE, ESL, or ABE, the Agreement of Mutual Responsibility (AMR) must be updated to reflect the appropriate barrier such as a need for a high school diploma or equivalent, assistance with English language proficiency, or receipt of adult basic education.

When an individual is mandatory, the CAO must denote good cause on page two of the AMR with a reason such as, "Good cause has been granted for additional core

and noncore hours and activities to remediate educational barriers due to no high school diploma/acquire English proficiency/needs adult basic education to improve employability.” Page three of the AMR, should reflect the federally required number of participation hours under “Participation Activities”.

The referral process for individuals participating in HSE, ESL, or ABE is outlined in [Attachment 1: TANF HSE, ESL, and ABE Referral Process](#).

Actual hours of participation in HSE, ESL, and ABE will be verified, tracked, and data entered into CWDS by the Employment and Training (E&T) contractor.

#### **Tracking HSE, ESL, and ABE:**

HSE – Activity Code 18: “Satisfactory attendance in Secondary School/HSE”

ESL – Activity Code 11: “English-as-a-Second Language (ESL)”

ABE – Activity Code 12: “Adult Basic Education/Literacy”.

**Special Allowances:** Individuals participating in HSE, ESL, and ABE programming will be eligible to receive special allowances, including but not limited to childcare, to support participation in the needed program, if they are otherwise eligible.

If a cash assistance recipient expresses interest in pursuing their HSE, ESL, or ABE while enrolled at a contractor (such as EARN or Work Ready), the E&T contractor must verify the credibility of the program and ensure suitability for the individual. The E&T contractor is also responsible to ensure the participant’s AMR is updated in concert with the CAO and the participant.

The CAO and E&T contractor will continue to utilize the policy provided in [Operations Memorandum #18-01-02, GED as Part of a Career Pathway](#) for individuals that are co-enrolled in HSE programming at a community college while taking college-level courses through the KEYS program.

#### **Post-Secondary Vocational Education Policy**

Effective immediately, vocational education extension policy is no longer limited to the 14 community colleges, 14 state-owned universities, and 108 approved career and technical schools. SNAP recipients and cash assistance recipients, regardless of TANF/ETANF status, participating or interested in participating in post-secondary education at **any** college, university, or trade and technical school may now receive good cause to extend vocational education activities to 24 months in a lifetime, with the possibility of six-month extensions thereafter if they meet all extension criteria.

The CAO must input code 87 into the good cause/tracking code field in eCIS for individuals that have exhausted the federal 12-month limit of vocational education to

receive good cause to extend vocational education activities time-limits to 24 months in a lifetime with the possibility of six-month extensions thereafter if they meet all extension criteria. The CAO and E&T contractor must ensure the AMR/ Employment Development Plan (EDP) is kept up to date to capture correct information.

To qualify for six-month extensions, after 24 months of participation in a vocational education activity, students must meet ALL conditions at the time of extension eligibility determination:

- Must be engaged in a degree or certificate program that will likely lead to employment in a High Priority Occupation as defined by the Department of Labor and Industry;
- Must not be enrolled in any remedial courses;
- Must have a cumulative Grade Point Average (GPA) of 2.0 or above\*; and
- Must have completed an average of at least eight credit hours per semester.

**NOTE:** Post-graduate (for example, a master's degree) vocational education activities are *not* allowable activities for TANF/ETANF or SNAP E&T participants.

*\*For post-secondary educational programs that do not assign credits or GPAs, the educational institution will be required to confirm that the individual is meeting satisfactory progress toward completion as defined by the institution.*

Any time spent in any combination of core vocational education activities (see [Attachment 4: Vocational Education Activity Codes](#)) counts towards the student's vocational education time limit. If otherwise eligible, students will continue to receive special allowances, including childcare, to support their educational activities for up to 24 months and thereafter if they qualify for six-month extensions. There is no limit to the number of six-month extensions a client may be eligible to receive and clients meeting all extension criteria may continue to receive extensions up to the date of graduation or program completion. An individual's compliance with extension criteria does not need to be continuous. For mandatory individuals, if extension criteria are not met at the time a client exhausts the initial 24 months, or upon continued extension eligibility determination, they must meet the required core hours in another core activity but can be reviewed for extension eligibility after each semester. For individuals volunteering to participate, please review [CAH 135.5 Volunteering to Participate in RESET](#).

**NOTE:** Second and Subsequent Training policy must be considered when reviewing extensions for vocational-education activities for SNAP and TANF/ETANF individuals.

TANF/ETANF individuals who are sanctioned by the CAO due to willful non-compliance while participating in post-secondary education will be reviewed for the ability to fulfill RESET requirements in a vocational education activity once the sanction

ends under the vocational-education criteria outlined above if they express interest in continued vocational education participation.

### **Extended TANF Vocational Education**

An ETANF individual actively participating or interested in pursuing HSE, ABE, ESL, or post-secondary education on or after reaching 1,830 TANF days may now continue to or initiate participation in vocational education activities, as well as receive special allowances to support their educational activity, for up to 24 months. ETANF individuals may also qualify for 6-month extensions if they meet all extension criteria. As with a TANF individual, if the extension criteria are not met at the time a participant exhausts their initial 24 months, or upon continued extension eligibility determination, they must meet required hours in another core activity but can be reviewed for extension eligibility after each semester.

A mandatory ETANF recipient that does *not* meet all extension criteria can remain in the post-secondary educational activity but would be required to meet the 30 hours in another core activity, other than vocational education, in order to be eligible to receive special allowances to support the educational activity.

An AMR for an ETANF individual must include:

1. ETANF eligibility track information and how individual is eligible for ETANF
2. Individual's goals and how education will support the ability to achieve those goals
3. Completed Vocational Education AMR Addendum

The same good cause policy and codes for HSE, ESL, ABE, and vocational education past the 12-month lifetime limit shall be utilized for ETANF participants.

### **Post-Secondary Vocational Education Referral Process**

The referral process for individuals participating in post-secondary education is outlined in [Attachment 2: Vocational Education Referral Process](#).

**All six-month extensions MUST be approved by the Bureau of Employment Programs (BEP).** The CAO will send six-month extension requests for Cash E&T participants to [RA-PWBEP.TANF@pa.gov](mailto:RA-PWBEP.TANF@pa.gov) and for SNAP E&T participants to [RA-PWBEP.SNAP@pa.gov](mailto:RA-PWBEP.SNAP@pa.gov). The CAO must send the request with the individual's most recent transcripts. BEP will take no longer than two business days to provide a response once all required information is received. The CAO must narrate the outcome and update the AMR/EDP if necessary.

Extensions while an individual is already participating in an E&T program will be approved by BEP via E&T contractor request. Therefore, the CAO is not required to seek BEP approval when an individual is already enrolled with an E&T contractor and participating as required.

The CAO will include [Attachment 3: Vocational Education Extension Addendum](#) with the client's AMR or EDP. The number of Vocational Education months the client has used will be identified on the Addendum. Second and subsequent training policy must be considered when determining an individual's ability to have the requested vocational education activity supported on their AMR or EDP.

### **NEXT STEPS**

1. Review this Operations Memorandum with appropriate staff.
2. Update a student's AMR, EDP, and coding at next client contact or at renewal, whichever comes first.
3. Cash E&T questions about this Memorandum can be directed to the Bureau of Employment Programs, via email at [RA-PWBEP.TANF@pa.gov](mailto:RA-PWBEP.TANF@pa.gov).
4. SNAP E&T questions about this Memorandum can be directed to the Bureau of Employment Programs, via email at [RA-PWBEP.SNAP@pa.gov](mailto:RA-PWBEP.SNAP@pa.gov)
5. This Operations Memorandum obsoletes Operations Memorandum #19-01-02.

### **ATTACHMENTS**

[Attachment 1: TANF HSE, ESL, and ABE Referral Process](#)

[Attachment 2: Vocational Education Referral Process](#)

[Attachment 3: Vocational Education Extension Addendum](#)

[Attachment 4: Vocational Education Activity Codes](#)