

BETP Master Guidelines Changes as of October 1, 2006
Most Commonly Asked Questions and Their Answers
December 8, 2006

As you know, BETP made some significant changes to the Master Guidelines in late September, and you were invited to PWDC in late October for training by Ruth Ann Van Dyke from BETP on these changes. Both TWD and our providers have had a number of questions and concerns regarding these Master Guideline changes. Initially, we scheduled a follow-up session for October 30th as a venue for you to ask your questions. In lieu of this cancelled session, we have posted below a list of commonly asked questions and their answers. In addition to reviewing these questions and answers thoroughly, it is imperative that you and your staff read and understand the BETP Master Guidelines. If after doing both, you have remaining questions pertaining to the Master Guidelines and their implementation, please email betpquestions@pwdc.org and cc Jasmine Eaddy jeaddy@pwdc.org if you are an EARN provider or Teresa Dooley tdooley@pwdc.org if you are a non-EARN provider.

1. The new guidelines require Family Start clients to do hours of participation during the In-Home Phase. Can this requirement be rescinded?

In-Home Phase:

All Family Start participants should remain enrolled with their employment and training provider during the In-Home Phase, but will be coded with subproject 11, as is currently the practice. These clients will not be required to meet 20 or 30 hours of participation, but will be expected to meet Family Start requirements. Failure to do so may result in the provider terminating the client from the program.

Clients are eligible to be in the Family Start In-Home Phase for 60 days. During the In-Home Phase, the provider, in consultation with the Family Start Momobile Family Advocate, is responsible for obtaining the client's actual hours of participation. Providers should then add appropriate case notes in CAPS and populate in Kronos on a weekly basis the actual hours the client participates.

For a client to meet full participation, they should be participating for 3 hours per week (this is how much time the Family Start In-Home Phase activities with the Family Advocate take). This is the total time that should be recorded in Kronos weekly during the In-Home Phase by the Provider Case Manager for the client. The 3 hours per week will be populated to equal 100% participation level when the Work Participation Rate (WPR) is calculated.

Transition to Program Phase:

On day 61, the client should be transitioned back to employment and training activities. Please note that when a client transitions from program to the In-Home Phase, providers should continue to use the same activity code they used for the client before transitioning. If a client was engaged in Job Search and Job Readiness assistance before transitioning to the In-Home Phase, the client's 6-week clock in this activity stops while the

client is in the In-Home Phase. The 6-week clock resumes when the client has completed the In-Home Phase and transitions back to program on day 61.

Example:

Client uses one (1) week of job search time while in program and enters the In-Home Phase on December 1, 2006.

Eight (8) weeks of time is used during the In-Home Phase.

Client transitions back to program on February 1, 2007.

Client resumes job search activities and has up to 5 weeks of job search time available. (Remember, there must be at least a one (1) week break between the 4th and 5th week in this activity)

Note: Currently, the Master Guidelines section regarding Family Start does not reflect the information in this answer. However, BETP plans to update the Master Guidelines soon so that the section on Family Start will reflect these changes.

2. How does the 12 month lifetime limit for core activity, Vocational Educational Activities (activity #24), get counted?

The 12 month limit is counted in weeks so if a client does 20 hours of Vocational Educational Training per week for 52 weeks, he/she exhausts his/her 12 month limit the same as if he/she were to have participated for 30 hours per week for 52 weeks.

Please see section V, A, 1 on pages #41-44 of the Master Guidelines for more information regarding activity #24, Vocational Educational Training.

3. Given the Master Guideline changes, what are the activity requirements for extended TANF clients? In the past, they had to enroll immediately in Community Service (CS) or Paid Work Experience (PWE), but if they are to be treated the same as non-extended TANF clients, then they should be allowed to do job search as a core activity. However, under the Master Guidelines just issued, clients must do job search for 30 hours/week, which would allow no time for CS or PWE. What should we follow for extended TANF clients?

The Master Guideline changes do not apply to extended TANF clients. For example, the six week time limit in a 12-month period for job search does not apply. Work Plus and EARN vendors should continue to serve extended TANF clients the same way they have been serving them except for one change. Activity 42, rather than activity 28, should be used to designate job search for these clients.

Please see section I, D, 2 on pages #3-4 of the Master Guidelines for more information regarding extended TANF clients and required hours of participation.

4. The Master Guidelines requires that Inspiritec serve as the sole verifier of retention. Would you please clarify what this means?

BETP wants one sole verifier of job retention. Inspiritec will be serving in this role. In terms of TWD providers, this will work in the following way. All providers are expected to register with Inspiritec all clients who meet retention. If Inspiritec is unable to confirm retention, providers have 30 days from the date the invalid verification completion date is posted on the retention website by Inspiritec in which to arrange for the client to contact Inspiritec directly or provide Inspiritec with one or more of the following: Revised or additional client contact information (if Inspiritec could not locate the client), a pay stub for the client, a letter on company letterhead from the client's employer.

Please see section IV, F, 2, g on page #34 of the Master Guidelines for more information regarding Inspiritec and verifying employment.

5. While providers wait for Inspiritec to validate retention, should they enter "retention met" in AIMS or should they wait until Inspiritec has verified it? If the latter, should the provider be entering hours for the client in Kronos while they wait for verification?

According to BETP, providers should not enter retention met until Inspiritec confirms the retention. While the provider waits for Inspiritec to confirm retention, they should enter hours for the client in Kronos.

6. If a student is in retention and employed for 24 hours a week, previously we opened code #28 to capture wrap around time. This is assuming the grant was still open. If job search is used, it counts against the student's allotted job search time of 6 weeks annually. How can we capture time? What are alternatives? Can I have the students come to school and work on projects to hone their skills and use the code for education while in training? Is it study time?

Following the example you gave of a client in post placement working for 24 hours per week and needing 6 hours in additional activities in order to meet the WPR of 30 hours per week, he/she will have to participate in another core activity or in an "other" activity for 6 hours per week. Two of the three "other" activities that providers probably will use most frequently are:

- *Activity 38, Job Skills Training Directly Related to Employment. The purpose of this activity is to improve skills on the job. Please see Section V, A, 13 on pages #81-82 of the Master Guidelines for more details.*
- *Activity 34 or 35, Education Directly Related to Employment. The purpose of this activity is to enable clients to participate in ESL, ABE/Literacy and GED preparation. Please see Section V, A, 14 on page #82 of the Master Guidelines for more details.*

Remember that as of 11/1/06, providers can no longer open an activity code 28 for wrap around job search. Activity code 28 only can be used to distinguish job search/job readiness for clients participating in the Work Support Component.

7. At training in October Ruth Van Dyke from BETP stated that assuming the student has used no excused absences the following can take place: A student is out for ten consecutive days with a doctor's note. The student does not return as scheduled. The five day termination rule goes into effect *after* the excused absence time runs out. Technically a student could be out for fifteen days in a row. Is this your understanding of the policy?

Yes, this is correct. However, please remember that you would still put hours into Kronos on days that a client receives an excused absence so for the 10 days that the client was out, they should have hours representing full participation in Kronos. Please see Section IV, D, 6 on page #26 for more information about the absence policy.

8. In the above example the extension to the 5 day termination rule no longer exists. Is this correct?

According to BETP, extensions to the 5 day termination rule are no longer permitted.

9. Should providers follow the 5-day termination policy and terminate a client if she/he has lost his/her job and the provider doesn't find out about it for at least 5 days?

It is critical that providers make sure their case managers are checking-in frequently with clients to provide retention services and find out whether their clients are still employed. Providers should also make sure that once they obtain a client's first full pay stub, they populate hours in Kronos on a monthly basis. If a provider finds out a client has lost employment, they should cease putting hours into the unsubsidized employment activity code in Kronos and begin putting hours into one or more other countable activity(s). Providers have 28 days in which to help a client obtain another job and still maintain retention.

10. If I have a student who is no longer on cash and would normally be a code "P" but wants to continue in training without support services, can I keep the student? Will we be paid for training and other benchmarks achieved for this student even though they are no longer TANF or Food Stamps and should have been terminated?

The Master Guidelines do not mention anything about how to proceed in this case. PWDC will make a decision about this on a case by case basis. Please contact Melissa Merriweather, Sr. Operations Manager, at 215-557-2539 or mmerriweather@pwdc.org when this situation with a client occurs.

11. What should I do for students who have lost their employment? Previously they would be reattached to job search. What do I reattach them to?

When a client loses her job, providers must connect them to 20 hours of core activities and another 10 hours in core or "other" activities. Some of the core activities that providers probably will use most frequently for clients that lose their jobs are:

- *Activity #42, Job Search and Job Readiness Assistance. This can only be used if a client has not yet exhausted their 6 weeks in this activity within a 12 month period (between 10/1/06 and 9/30/07). Please see Section V, A, 2 on pages #44-70 of the Master Guidelines for more details.*
- *Activity #20, Community Service. Please see Section V, A, 12 on pages #79-81 of the Master Guidelines for more details.*
- *Activity #26, Paid Work Experience. Please see Section V, A, 5 on pages #74-79 of the Master Guidelines for more details.*

Two of the three “other” activities that providers probably will use most frequently are:

- *Activity 34 or 35, Education Directly Related to Employment. The purpose of this activity is to enable clients to participate in ESL, ABE/Literacy and GED preparation. Please see Section V, A, 14 on page #82 of the Master Guidelines for more details.*
- *Activity 38, Job Skills Training Directly Related to Employment. The purpose of this activity is to improve skills on the job. Please see Section V, A, 13 on pages #81-82 of the Master Guidelines for more details.*

12. Do I put students who graduate from training into a 2 week job search? If not, should I wait for clarification from PWDC?

***The following only applies to SPOC JSST client:** Any activities that SPOC JSST clients engage in during the pre-placement phase of the program should be coded as training, activity code #24. All activities in which the client engages are blended into training.*

13. When students are put into community service to meet program time and attendance requirements, do I need a new AMR from the CAO?

No. However, when a client transfers to JSST from a Placement or EARN provider, the original AMR will now be attached to the EDRP and will tell how many hours the client must do in community service. For clients that JSST providers currently have, please contact the clients’ referring provider for the AMR.

14. Will students in community service still require bi-monthly worksite assessments and monthly supervisor assessments for the file to be in compliance?

Yes, in order for the file to be in compliance providers are still required to conduct monthly worksite assessments and supervisor assessments for students in community service.

15. If a student's community service hours do not meet program participation of 30 hours per week, should another activity be opened to capture additional hours?

TWD provider clients are expected to engage in at least 30 hours per week of activities, at least 20 of which must be in core activities. If the client cannot participate in 30 hours of Community Service due to the Fair Labor Standards Act (FLSA) but can do at least 20 hours, you will need to help her identify either a different core activity or an "other" activity in which to engage so she can meet her 30 hour per week requirement. If, due to FLSA requirements, the client can engage in Community Service for a maximum of less than 20 hours, you will need to find another "core" activity to get her to 20 hours and then, as in the previous example, find a core or "other" activity for her additional 10 hours (to get her to a total of 30 hours). Please see Section V, A, 12, ii on page #79 of the Master Guidelines for more information about the FLSA and community service.

16. If I have a student who is not receiving cash (Food Stamps Only), is the job search limit of six weeks per year still in effect?

No. The core and "other" activity requirements, including the 6-week job search limit within a 12-month period (activity #42) and the 12 months in a lifetime limit on Vocational Educational Training (activity #24), do not apply to clients who are not receiving TANF cash assistance because these clients are not counted by the federal government in the Work Participation Rate (WPR) calculation.