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| LOCAL COMMISSIONERS MEMORANDUM |
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DSS-4037EL (Rev. 9/89)

Transmittal No: 94 LCM-123

Date: October 6, 1994

Division: Office of Employment
Programs

TO: Local District Commissioners

SUBJECT: Training Related Expenses, Child Care and Other Supportive
Services Under the Job Opportunities and Basic Skills
Training (JOBS) Program

ATTACHMENTS: List of Allowable Supportive Services
(Available On-Line)

The purpose of this memorandum is to summarize and clarify policy regarding the provision of Training Related Expenses (TRES), child care and other supportive services provided to participants in the Job Opportunities and Basic Skills Training (JOBS) Program.

There are both federal and State requirements that child care and other supportive services be provided to enable applicants and recipients of Aid to Dependent Children (ADC), Home Relief (HR) and Veterans Assistance (VA) to participate in:

- | orientation, assessment and development of an employability plan;
- | job search; and
- | other assigned and approved JOBS activities including education and training.

Appendix A provides a list of allowable supportive services and the maximum expenditure allowed for these services which may be provided as:

- | training related expenses - to support participation in JOBS activities;

- | one-time employment related expenses - to enable recipients to accept or maintain employment; or
- | extended supportive services - services (other than Transitional and recurring child care) provided for up to 90 days, at district option, to individuals who have been JOBS participants and who have lost eligibility for public assistance.

The provision of supportive services should be based on the guiding principles discussed below. These principles are particularly relevant to the provision of recurring TREs.

1. TREs and supportive services should be in place in time for the JOBS participant to engage in scheduled JOBS activities.

Procedures should be reviewed to ensure that child care and supportive services are regularly in place in time for a recipient to participate in scheduled JOBS activities.

Local flexibility exists in developing authorization and payment options to ensure that this is accomplished. Consideration should be given to the question of whether timely services can best be accomplished through a coordinated effort which places responsibility for authorizing such services within the same entity that is responsible for arranging the JOBS assignment.

Where advance payments are made, the advance must be reconciled with actual expenditures or care provided.

2. Child care and TREs are to be provided to JOBS participants as a result of a specific determination that such services are necessary in order for a participant to progress towards employment.

The provision of these services must be based on demonstrated need. Prior to authorizing child care and/or other TREs, an evaluation of the need for such services must be conducted and included in the employability plan.

The determining factor in authorizing these services is the extent to which they are necessary to enable the individual to participate in JOBS. With regard to child care services, the scope of services should reflect the parent's activity schedule. Child care services should correlate with the hours of parent participation including travel to and from the child care provider. The amount of child care needed for school-aged children will be minimal for most JOBS participants, with the obvious exception of school holidays and vacations.

3. JOBS participants are eligible for TREs only for those days they actually are engaged in the JOBS activity.

When a participant receives recurring payments for child care and TREs, the continued need for such services must be reassessed on an ongoing basis. Verification of actual attendance of JOBS participants in activities is required and must be documented. A reporting mechanism for tracking hours of activity attendance should be in place with each provider which, at a minimum, provides monthly attendance reports and details each recipient's actual attendance.

The minimum Federal standard for counting a recipient as a participant in JOBS is attendance at no less than 75% of scheduled activities. This reporting standard should not be confused with the means by which the level of TRE or child care reimbursement is calculated. For example, a person scheduled to attend an educational program for twenty full days during a particular month attends only fifteen days. This person meets the 75% federal standard for satisfactory participation for that month, but is entitled to only fifteen days of child care and supportive services.

However, in accordance with 90 ADM-27, child care payments must be made for participants who are:

- | approved for and waiting to enter JOBS activities; or,
- | between JOBS activities; or,
- | on a break from a JOBS activity.

Payments for the above circumstances may be provided for up to two weeks, or for up to one month where child care arrangements would otherwise be lost and the activity is scheduled to begin within that period.

You may also elect to make payment for a child's absence from child care in accordance with Section 415.6(g) of the Department's regulations. Such payment is available only to regulated child day care providers with whom the district has a contract or written agreement.

In recovering an overpayment for child care, you should be careful that the recipient retains a reasonable amount of funds with which to purchase child care needed to continue participating in the JOBS activities. When child care services have been provided, recovery should be from the client and not the child care provider.

Any overpayments of child care and other supportive services must be corrected immediately. The recoupment of child care overpayments are to be made from future child care benefits, unless the recipient requests that such recovery be made from the PA cash benefit payments. Similarly, overpayments of IV-F supportive services are to be recovered from future supportive services payments.

If the recipient of ADC, HR or VA requests that recovery be made from cash grant payments, normal procedures can be used to allow ABEL to automatically calculate and execute the recoupment.

NOTE: When an individual is not attending at least 75% of scheduled hours and, therefore, is not satisfactorily participating, all TREs and supportive services should be terminated pending the results of conciliation.

4. TREs and supportive services for participants in educational and training programs can only be authorized when the education or training provider is approved by the local district.

Responsibility for the approval of provider training programs rests with each social services district. All training approvals must be made according to district standards based on the requirements specified in 90 ADM-27. To qualify for TREs or supportive services, JOBS participants should only be attending those training programs so approved. Participants attending programs not approved in accordance with 90 ADM-27 are not eligible for TREs and other supportive services related to the JOBS program.

Any questions regarding this memorandum should be directed to your local district Technical Advisor for Employment Programs at 1-800-343-8859, extension 3-7993.

Jack Ryan
Assistant Commissioner
Office of Employment Programs

Job Opportunities and Basic Skills Training Program
(JOBS)

TREs/Supportive Services

A. JOBS Related Supportive Services

The following must be provided on an as needed basis:

1. day care for ADC JOBS participants prior to entering JOBS activities, between JOBS activities and during breaks in participation in JOBS activities, for a period not to exceed two weeks or for a period not to exceed one month if day care arrangements would otherwise be lost and the subsequent activity is scheduled to begin within that period, and day care for HR participants to the same extent as is available to ADC participants if State appropriations are available therefore;
2. lunch, at \$2 per day;
3. transportation, but not more than the cost of public transportation if available or, if not, at a level up to 30 cents per mile, but not to exceed the reimbursement rate for private transportation regularly paid by the social services district to its employees; this includes the cost of transporting children of JOBS participants to and from child day care;
4. up to a maximum of \$150 per JOBS activity for clothing necessary for participation in JOBS activities;
5. up to \$100 for each license or for other work-related fees necessary for participation in JOBS activities during any period of eligibility for ADC, HR or VA;
6. up to a maximum of \$500 during any period of eligibility for ADC, HR or VA for tools and equipment necessary to participate in JOBS activities;
7. up to a maximum of \$500 or the retail value of the automobile, whichever is less, during any period of eligibility for ADC, HR or VA for reasonable costs of necessary repairs to a JOBS participant's automobile, and up to a maximum of \$1,000 during any period of eligibility for ADC, HR or VA for payment of necessary automobile insurance meeting minimum State requirements during participation in JOBS activities. Such expenditures may be authorized only when they are the least costly means of meeting the transportation needs of a JOBS participant;
8. individual and family counseling, up to a maximum of \$100 for each individual session and \$50 for each group session, for crisis intervention, problem solving skills, drug and alcohol abuse, and related problems;

9. life and parenting skills training and counseling, up to a maximum of \$100 for each individual session and \$50 for each group session;
10. counseling, up to a maximum of \$100 for each individual session and \$50 for each group session, which is drug or alcohol vocationally related, when necessary for effective participation in JOBS activities;
11. child care registration fees, up to \$50 per child, for enrollment of children of JOBS participants in child care when such child care is necessary for participation in JOBS;
12. day care for incapacitated adults, up to a maximum of \$500 during any period of eligibility for ADC, HR or VA; and
13. for children of JOBS participants:
 - (a) up to \$204 per week up to a maximum of \$1,300 per child per attendance for fees for children of JOBS participants receiving ADC to attend camp or other programs when such camp or other program is designed to include activities which assist the family in achieving self-sufficiency and enable the children to avoid welfare dependency in their adult years;
 - (b) up to a maximum of \$500 per child per attendance for expenses for children of JOBS participant children to attend academic enrichment, vocational skills exploration/development and career interest exploration programs;
 - (c) up to \$100 per child for each medical examination required for children entering child care when not otherwise covered by the Medical Assistance Program;
 - (d) counseling, up to \$100 for each individual session and \$50 for each group session, for crisis intervention, drug or alcohol abuse, or child development services; and
 - (e) counseling, up to \$70 for each individual session and \$25 for each group session, for drug and alcohol education, independent living and life skills.

B. One-Time Work Related Supportive Services

The following must be provided on an as needed basis:

1. job related safety equipment, up to a maximum of \$200 for each entry to employment;
2. clothing, including but not limited to uniforms and footwear, up to a maximum of \$150 for each entry to employment;

3. tools and equipment, up to a maximum of \$500 during any period of continued eligibility for ADC, HR or VA;

4. up to \$100 for each license or for other work related fees;

5. counseling, up to a maximum of \$100 for each individual session and \$50 for each group session, which is drug or alcohol vocationally related;

6. reasonable costs of necessary repairs to a JOBS participant's automobile, up to a maximum of \$500 or the retail value of the automobile if that value is less, during any period of eligibility for ADC, HR or VA; and legally required automobile insurance, up to a maximum of \$1,000 during any period of eligibility for ADC, HR or VA;

7. initial liability insurance costs, up to a maximum of \$79 per child, for JOBS participants receiving ADC when such participants become family day care providers;

8. medical exam costs, up to a maximum of \$100 per child, for children of JOBS participants who are entering child care; provided however, that such cost is not available under the Medical Assistance Program; and

9. day care for incapacitated adults, up to a maximum of \$500, during any period of eligibility for ADC, HR or VA.

C. Extended Supportive Services (for those no longer eligible for PA).

1. Transitional Child Care (if eligible) for one year;

2. at district option, any of the listed supportive services, or case management services for up to 90 days from date of ineligibility (excluding recurring child care costs).

3. Transitional Medical Assistance