

TANF Youth Development Program (YDP) Frequently Asked Questions

Q1: On p.4 of the manual, it states that “no additional group activities may be planned after the implementation of this new guidance. An exception may be granted if the TANF YDP provider is able to collect TANF documentation on each group activity participant.” Who would approve the exception and what would be the process?

A1: To clarify, there will not be a requirement to submit exception requests to the Commonwealth for approval. LWDBs and their TANF YDP providers will just need to document the youth attending any planned TANF YDP group activity and ensure that each attendee has been individually determined to be a qualified TANF YDP participant. Such documentation must be kept on file locally and made available upon request.

Q2: On pp.5 & 6 of the manual, it explains the participant qualification process. A monthly spreadsheet with required participant data is due by the last business day of the month and a response will be provided within 14 calendar days. Can a spreadsheet be submitted more often, as necessary?

A2: At this time, DHS is requesting monthly submissions of the participant report. DHS will re-evaluate the timeframes and the feasibility of more frequent report submissions after the first few months of transitional implementation.

Q3: On p. 2 of the manual, it mentions that providers that choose to serve a client prior to establishing them as qualified, accept the risk of later using alternate funding to cover the cost. Is it accurate to assume that the cost of serving a client, prior to a response from the central office, would be unallowable?

A3: No. Youth may be served from the date they apply for services. Regardless of how long the central office takes to qualify a participant, qualification begins the date that the youth applies. However, if the central office determines that the individual does not qualify for TANF YDP, the program must be prepared to use alternate funding to cover the cost. The qualification factors are outlined in detail in the manual, so programs should have a high level of confidence that the participant will qualify for services covered by TANF YDP funds at the time of the youth’s application.

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Q4: Where can I obtain the guide referred to on p. 12, Appendix B. The * suggests we use the most current version of the PA High Poverty Area Verification tool. Is there a graph, chart or map that identifies what areas fit this criterion?

A4: BWDA has not put out a graph, chart, or map related to Pennsylvania's designated high poverty areas. However, (on 4/25/17) L&I's Bureau of Workforce Partnership and Operations (BWPO) emailed out the current WIOA High Poverty Area Verification Tool (with step-by-step instructions) to LWDA representatives, which requires entering the address of a prospective participant to determine whether they reside within a high poverty area. If so, then this designation can then be printed out and placed into the TANF YDP (or WIOA) participant data file as eligibility documentation.

Q5: On p. 2, A. Qualified Participants and Funding Categories (Last paragraph) -- Youth may self-certify if they do not have earned income. The WIOA Self-Certification Form may be used. Under WIOA, the self-certification form is used as a "last resort" document to verify income. Instead, the Family Size & Income form is utilized first. Will this form be acceptable for TANF YDP?

A5: Yes, The WIOA Statement of Family Size/Family Income Form may be used for this purpose. As a last resort, the self-certification form may also be used.

Q6: On p. 5, Section III - A, the report is due by the last business day of the month. Would you consider changing to the 5th business day of the month to assure all activities for the previous month are included?

A6: Currently, spreadsheets will be due each month, by the last day of the month, for applications received within that month. However, DHS will re-evaluate the timeframes for spreadsheet submissions during the first few months of transitional implementation.

Q7: On p.6, Section III - A, the report includes the applicant's full social security number. Contractors should be reminded that the report will have to be sent by secure email.

A7: Yes, this is worth repeating. Participant data, including social security numbers, shall always be transmitted securely (e.g., encrypted, etc.).

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Q8: On p. 6, 2nd paragraph, “BEP will conduct a data match from the spreadsheets to first identify any youth currently receiving any DHS benefits (TANF, SNAP, and/or most categories of MA) ...” Contractors with CIS access can print screens to verify receipt of the DHS benefits identified. Is it necessary for BEP to confirm the screens we print?

A8: TANF YDP providers that can obtain CIS screens to verify benefit receipt may continue to do so and keep that verification in case files. However, these individuals and their information must still be provided on the Participant Qualification Spreadsheet, as DHS will be doing a data match of all SSNs.

Q9: On p. 6, 2nd paragraph, the manual states “then identify those youth not currently receiving DHS benefits, but whose personal monthly gross income does not exceed 235% of the Federal Poverty Income Guidelines (FPIG).” The contractor could easily compare the gross income to the FPIG, which the Commonwealth updates twice a year and sends to the local workforce development areas. Correct?

A9: This is correct. TANF YDP providers should be very confident in a youth’s qualifications for TANF YDP services/funds before submitting the Participant Qualification Spreadsheet to DHS for review and response.

Q10: On p. 6, 3rd paragraph, the manual states “BEP will update the submitted TANF YDP PARTICIPANT QUALIFICATION SPREADSHEET to identify those verified as qualified to participate in TANF YDP and return to the TANF YDP youth provider within 14 calendar days.” If an applicant applied for services on the first day of the month, they would not be eligible to receive services for 1½ months. Our current turnaround time is less than one (1) week. Is there a way to avoid this type of delay?

A10: This is a transition period for DHS, L&I, the LWDBs, and their local providers. DHS will re-evaluate the turnaround timeframes for spreadsheet review in a few months. However, this should not impact the youth being served in a timely manner. Regardless of how long the central office takes to qualify a participant, qualification begins the date that the youth applies. However, if the central office determines that the individual does not qualify, the program must be prepared to use alternate funding to cover the cost. The qualification factors are outlined in detail in the manual, so local programs should have a high level of confidence that the participant will qualify to be served with TANF YDP funds at the time of a youth’s application.

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Q11: On p. 11, PA Residence Verification (Section II), #7 lists a recent Dept. of Human Services' benefit letter." Would a Public Assistance printout (CIS screen) be acceptable?

A11: Yes, this would be acceptable.

Q12: On p. 11, PA Residence Verification (Section III), under examples of acceptable income verification: Would the WIOA Statement of Family Size/Family Income be acceptable?

A12: Yes, this would be acceptable.

Q13: On p. 11, Section III - PA Residence verification: Under examples of acceptable income verification – #1 one month (30) days of paystubs, however on page 17, #4 Proof of Household Income it states two (2) consecutive pay subs within the last six months. If an individual is paid weekly, two pay stubs will not equal 1 month/30 days of income.

A13: This inconsistency has been corrected in the manual to reflect "One month (30 days) of paystubs..." on both pp. 11 & 17.

Q14: On p. 14, Appendix C: Excluded Earned Income of a Child, "WIOA income is excluded income for youth, except when an individual is 19 years or older, or under 19 and under parental control AND participating in OJT programs." Is TANF YDF income (paid work experience from previous six months) excluded or included income?

A14: Paid Work Experience wages have always been included income for TANF and SNAP recipients over the age of 18.

Q15: On p. 17, #3 – Proof of PA Residency (dated within the last 6 months) -- Driver's license or PA State ID – Does the driver's license have to be issued in the last 6 months or does a "valid" driver's license meet the definition?

A15: A currently valid driver's license will be sufficient for proof of PA residency.

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Q16: On p. 18, #5 – Additional Barrier(s) -- Additional barriers are only required for low income youth identified by High Priority Area residency only. Therefore, when not using the High Priority Area for residency, youth do not need to have a barrier – only SSN, PA residence and income must be verified, correct?

A16: Yes, that's correct. However, it is strongly encouraged to target programming and services toward youth with barriers, whenever possible.

Q17: For Appendix D – Monthly TANF YDP Participant Qualification Spreadsheet -- If a participant is going to be enrolled in more than one activity (paid work experience; career exploration; and a job fair) do they have to be recorded three times on the spreadsheet?

A17: No, each prospective TANF YDP participant only needs to be recorded once on the spreadsheet. The report will capture one activity per participant.

Q18: For Appendix D – Monthly TANF YDF Participant Qualification Spreadsheet -- If a participant has multiple barriers do they have to be recorded more than one time to identify all barriers?

A18: No, each prospective TANF YDP participant only needs to be recorded once on the spreadsheet.

Q19: Are we required to use the release of information form in the manual or can we use our existing form?

A19: You may use your existing form; provided it covers, at a minimum, all the same information included in Attachment 2 (as recently revised to accommodate signature of parent or guardian).

Q20: For school students, can other school records in addition to a report card be used as proof of residency?

A20: Yes, other official school records may be used as proof of residency, if they are provided on school letterhead.

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Q21: Your authorization for release of information form does not have space for the signature of a parent of a minor. Does a parent or guardian have to sign the release of information form for a minor?

A21: Yes. Attachment 2 was recently revised to accommodate the signature of a parent or guardian.

Q22: Can the TANF YDP Data file be in electronic form?

A22: Yes, TANF YDP participant data files can be in electronic format. However, all participant data must be secured and only accessible to authorized program staff and monitors. Additionally, these electronic records must follow the same required retention and disposition timeframe outlined within the TANF YDP Manual.

Q23: Is the resource account website considered secure for handling PII? Can we send the spreadsheet as an encrypted file?

A23: The TANF YDP joint-agency resource account is not secure on its own. Spreadsheet submissions, and any other PII, must be encrypted prior to emailing to the resource account. However, the Commonwealth is currently exploring the possibility of having a secure server for the on-going transmission of sensitive spreadsheet data between designated state and local staff. Further detail regarding an alternate option for securely transmitting TANF YDP data will be shared as soon as it becomes available.

Q24: One of the sources of proof of PA residency is "Affidavit from someone other than the participant." Is there an existing form or required format for the affidavit? Would it require notarizing?

A24: There is not a formal existing form to capture this statement. A written statement that includes the contact information of the third party verifying the PA residency of the youth is sufficient. It does not need to be notarized.

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Q25: If a group activity is planned but not executed in October 2018, can it still be implemented without prior approval?

A25: Only group activities that were planned prior to October 2018 may be executed beyond October 2018. No new group activities may be planned and executed after October 2018 unless TANF YDP providers are able to collect the required verifications from each prospective group activity participant and submit the information (via spreadsheet) to DHS for review and qualification (if the participant was not already previously determined qualified under the new TANF YDP guidelines).

Q26: The guidelines state that only staff associated with the participant case may have access to his file. I assume this includes not only the case manager but also administrative staff. Does a secure location for the file require it to be locked up?

A26: Yes, this includes the case manager and administrative staff; and yes, the participant files are required to always be secured/locked up when not actively being utilized by designated staff.

Q27: The original TANF plan was based upon previous guidelines. Will plan revisions be considered?

A27: The PY '17 TANF Plans were extended into PY '18, up to the date of the required implementation of the new TANF YDP guidance (10/15/18). Since this is a transition period, revised TANF YDP Plans will not be required to be submitted for the remainder of PY '18 program activity. However, LWDBs will be required to share program details from this transition period within the shortened PY '18 (10/15/18 - 6/30/19) Final Report, next summer. Additionally, in Spring 2019, LWDBs will pick back up with developing and submitting a plan for their PY '19 TANF YDF allocations. The Commonwealth will issue guidelines and deadlines for the submissions of all future TANF YDF Plans and Final Reports, as we move forward.

Q28: Most local workforce development boards contract with service providers to operate the program. Are you expecting every service provider to potentially submit the spreadsheet?

A28: No. During the TANF YDP Overview Conference Call on September 19, 2018, the Commonwealth strongly urged each LWDB to establish a local process with their TANF YDP providers for the coordinated and efficient submission of their TANF YDP Spreadsheets. Ideally, each LWDB will have one designee, or a small core group of designees who work closely with one another, to complete and submit the monthly spreadsheet to the Commonwealth for review and response.

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Q29: *The current manual is dated PY 2018-2019. Should LWDB's expect a new manual to come out next calendar year?*

A29: Yes. The Commonwealth will re-issue the TANF YDP manual for the new program year, which will likely reflect any updates or changes that occurred during the TANF YDP transitional period (10/15/18 - 6/30/19).

Q30: *IIA. Qualified Participants -- If our local area already has a self-attestation form, can we continue to use this? How should we go about getting approval from the Commonwealth?*

A30: Yes, your LWDA can continue to use your own self-attestation form as long as it covers, at a minimum, all the same information included in the WIOA self-attestation form. Prior review and approval by the Commonwealth will not be required.

Q31: *Under Section IIIA., about the Qualification Spreadsheet -- Does DHS want one spreadsheet from the LWDB or multiple spreadsheets from the providers or programs individually? Note: We have providers who have more than one TANF program so even providers could have multiple contacts.*

A31: During the TANF YDP Overview Conference Call on September 19, 2018, the Commonwealth strongly urged each LWDB to establish a local process with their TANF YDP providers for the coordinated and efficient submission of their TANF YDP spreadsheets. Ideally, each LWDB will have one designee, or a small core group of designees who work closely with one another, to complete and submit the monthly spreadsheet to the Commonwealth for review and response.

Q32: *Under Section IIIA., about the Qualifications Spreadsheet -- What is the intention of "Length of Activity" and "Activity Type" for eligibility determination purposes?*

A32: These categories are not specifically being used to qualify individuals for TANF YDP funding and services. However, DHS is very interested in tracking participant activities and their duration. We want to ensure that all TANF YDP activities are allowable costs.

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Q33: In Section IIIA. of the Manual - TANF YDP Participant Qualification Spreadsheet -- Will a schedule be determined for monthly submission? Is the expectation that these spreadsheets will only be submitted once a month?

A33: Currently, spreadsheets will be due each month by the last day of the month for applications received within that month. However, this is a transition period for DHS, L&I, the LWDBs, and their local providers. DHS will re-evaluate the turnaround timeframes for spreadsheet review in a few months. However, this should not impact the youth being served in a timely manner. Regardless of how long the central office takes to qualify a participant, qualification begins the date that the youth applies. But, if the central office determines that the individual does not qualify, the program must be prepared to use alternate funding to cover the cost. The qualification factors are outlined in detail in the manual, so local programs should have a high level of confidence that the participant will qualify to be served with TANF YDP funds at the time of a youth's application.

Q34: IIIB. Participant Enrollment Procedures -- Will an exception be made for youth who do not have an address, they may be homeless or a runaway?

A34: TANF YDP providers may document the homeless or runaway status of a youth using any of the following acceptable verifications, as outlined in BWPO's *WIOA DATA ELEMENT & ACCEPTABLE ELIGIBILITY VERIFICATION* document (p.6), located in the CWDS Help Center (click "Manuals" under the "List of How To's"):

- 1) Written Statement from an Individual Providing Temporary Residence
- 2) Written Statement from Shelter
- 3) Written Statement from Social Service Agency
- 4) WIOA Telephone Verification/Document Inspection Form (See CWDS Help Center)
- 5) WIOA Self-Certification Form (See CWDS Help Center)
- 6) Other

Q35: IIIB. Participant Enrollment Procedures -- Can you provide more clarity for household size (i.e., would a youth participant's parent/guardian and/or siblings be included for income determination)?

A35: Household size for TANF YDP includes only the youth receiving the services, and their spouse and children, if the latter 2 are applicable. Only gross earned income from these household members will be used to qualify a youth. A youth's parents, grandparents, siblings, etc. are not included in the TANF YDP household for size or income.

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Q36: V. Performance Standards and Goals -- Please define “workforce investment activity.”

A36: The term “workforce investment activity” refers to all workforce-related programming designated for TANF YDP participants, in alignment with the WIOA Youth program guidelines (e.g., work experiences, career awareness and exploration, etc.).

Q37: Under VI. Oversight and Monitoring -- Can we expect a monitoring tool, to help us better monitor our providers? If so, when?

A37: Yes, a TANF YDP monitoring tool will be shared with each LWDB to assist with your local monitoring. This tool is currently under development between L&I and DHS team members and will be distributed to each LWDB once both the tool and the monitoring process have been finalized.

Q38: Under VI. Oversight and Monitoring -- Will DHS and L&I monitor at the LWDB site or schedule to monitor at the provider locations?

A38: Commonwealth staff currently have plans to visit both types of sites/locations during future monitoring cycles, but this will be coordinated and scheduled in collaboration with local board staff.

Q39: For Appendix B: Verification for Participation (Residence) – Will an exception be made for a youth who is homeless or a runaway? Can they use a self-attestation?

A39: TANF YDP providers may document the homeless or runaway status of a youth using any of the following acceptable verifications (p.6), as outlined in BWPO’s *WIOA DATA ELEMENT & ACCEPTABLE ELIGIBILITY VERIFICATION* document, located in the CWDS Help Center (click “Manuals” under the “List of How To’s”):

- 1) Written Statement from an Individual Providing Temporary Residence
- 2) Written Statement from Shelter
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- 4) WIOA Telephone Verification/Document Inspection Form (See CWDS Help Center)
- 5) WIOA Self-Certification Form (See CWDS Help Center)
- 6) Other

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Q40: Appendix B: Verification for Participation: Income – How should a provider proceed if a potential participant has zero income and is not receiving TANF?

A40: If the TANF YDP provider knows that the youth is not receiving TANF benefits and has stated that they have zero income, the youth may qualify for TANF YDP by receiving another public benefit such as SNAP or MA, or they may qualify under “Family Works” by having earned income that is at or below 235% of the Federal Income Poverty Guidelines.

Q41: Attachment 1: Required Document Checklist -- Do providers have to use these checklists? If our local area has a checklist, how do we get approval from the Commonwealth to continue to use it?

A41: Providers may use their own checklists; provided it covers, at a minimum, all the same information included in Attachment 1 of the manual.

Q42: Attachment 2: Authorization for Release of Information (ROI) -- Do providers have to use this ROI form? If our local area has a ROI form, how do we get approval from the Commonwealth to continue to use it?

A42: You may use your existing ROI form; provided it covers, at a minimum, all the same information included in Attachment 2 (as recently revised to accommodate signature of parent or guardian).

Q43: Excel can be encrypted with a password. Will you provide a password for us to use?

A43: The Commonwealth is currently exploring the possibility of having a secure server for the on-going transmission of sensitive spreadsheet data between designated state and local staff. Further detail regarding an alternate option for securely transmitting TANF YDP data will be shared as soon as it becomes available.

Q44: Is the age limit for eligibility “at enrollment” only? Example – an individual who is 24 at enrollment will not lose eligibility due to their 25th birthday while they are a participant in our program?

A44: Yes, this requirement refers to a youth’s age at the time of enrollment. A participant may still complete the TANF YDP activity that they were already engaged in once they reach 25 years of age, but they may not begin a new activity once they have reached age 25.

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Q45: On p. 2 of the Manual - Section II (first paragraph) -- If a local board chooses to serve older youth, are they able to focus the funding solely on work experience opportunities for older youth only.... possibly ages 16-24?

A45: TANF YDP providers may choose to focus the activities/services they will provide on older youth, younger youth, or the full TANF youth age-range (i.e., 12-24 years), if the overall TANF YDP requirements, including allowable costs, are being followed. However, the LWDB must ensure that the segment of the youth population, not served with TANF YDF, still has the opportunity to receive local workforce programming supported by an alternate funding stream.

Q46: Regarding the income of youth - if a youth has no income, how is this documented? In other words, will we ever need household income and documentation for in-school youth? For example, a 12-year-old would not be working, but would be living at home (of course), so whose income do we document?

A46: The youth's statement of no employment or earned income is satisfactory. By signing the application indicating no earned income, the youth is also verifying that they have no income to report. Only the youth, along with their spouse and children (if applicable), are included in the household for size and income.

Q47: For the "Local Provider Organization" column on the spreadsheet, do you want the actual name of the local agency that is contracted to provide the TANF YDP services?

A47: Yes, that's correct.

Q48: In order to comply with encryption requirements, our local providers plan to submit their spreadsheet using password sensitive encryption. I assume this is acceptable?

A48: Yes, this is acceptable. Spreadsheet submissions, and any other PII, must be encrypted prior to emailing to the resource account. However, the Commonwealth is currently exploring the possibility of having a secure server for the on-going transmission of sensitive spreadsheet data between designated state and local staff. Further detail regarding an alternate option for securely transmitting TANF YDP data will be shared as soon as it becomes available.

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Q49: Will further information be forthcoming on the spreadsheet transmission process including the format of the response from your office? Will you need information on the names of authorized individuals who will be submitting spreadsheets?

A49: Yes, further information on this topic is forthcoming. The Commonwealth is currently exploring the possibility of having a secure server for the on-going transmission of sensitive spreadsheet data between designated state and local staff. Further detail regarding an alternate option for securely transmitting TANF YDP data will be shared as soon as it becomes available. Yes, the Commonwealth will need the names of the local staff designated as authorized to submit spreadsheets. During the TANF YDP Overview Conference Call on September 19, 2018, the Commonwealth strongly urged each LWDB to establish a local process with their TANF YDP providers for the coordinated and efficient submission of their TANF YDP spreadsheets. Ideally, each LWDB will have one designee, or a small core group of designees who work closely with one another, to complete and submit the monthly spreadsheet to the Commonwealth for review and response.

Q50: We have six offices that wish to submit spreadsheets twice a month, if necessary. Is this a problem?

A50: Yes, this is potentially a problem. During the TANF YDP Overview Conference Call on September 19, 2018, the Commonwealth strongly urged each LWDB to establish a local process with their TANF YDP providers for the coordinated and efficient submission of their TANF YDP Spreadsheets. Ideally, each LWDB will have one designee, or a small core group of designees who work closely with one another, to complete and submit the monthly spreadsheet to the Commonwealth for review and response. During the initial phase of this implementation, DHS will only be accepting the spreadsheet once per month. However, since this is a transition period for DHS, L&I, the LWDBs, and their local providers, DHS will re-evaluate the turnaround timeframes for spreadsheet submissions and reviews over the next few months and attempt to address any major issues with the process.

Q51: For proof of residency, can we use other school records, such as student ID's?

A51: Yes, current student IDs would be considered a school record for our purposes.

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Q52: Per the TANF YDP Overview conference call (on 9/19/18), we believe that it was stated that a self-certification could be used to verify participant income, however, there is no listing for a self-certification under the proof of household income box in Attachment 1. Can the self-certification be used to verify income? If so, can the attachment be updated to reflect a checkbox for that? Is it possible to have a standard self-certification form provided by the state so that it is a consistent document throughout the state?

A52: Every attempt must first be made to obtain verification of income through the employer, pay stubs, etc. Self-certification should be the last resort to verify income. There is no official form for TANF self-certification. The WIOA self-certification form may be used, or a student may provide a handwritten statement of income.

Q53: Can a statement of family size/family income sheet be used to verify proof of income? If so how should family members be listed? Should a participant's mother/father/siblings be listed if their income would not count toward the participant? Should they be listed on the sheet but income noted as N/A? Should they not be listed on the sheet at all? If this document can be used can it also be added to the attachment as a checkbox option?

A53: Household size for TANF YDP includes only the youth receiving the services, and their spouse and children, if the latter 2 are applicable. Only gross earned income from these household members will be used to qualify a youth. A youth's parents, grandparents, siblings, etc. are not included in the TANF YDP household for size or income. Yes, the statement of family size/family income can be used, however, every attempt must first be made to obtain verification of income through the employer, pay stubs, etc.

Q54: Verification from schools that participants received free or reduced lunches has been utilized in the past to show income below the 235% federal poverty income guideline. Could this still be an option under the new program? If so, can the attachment be updated with a checkbox to reflect that?

A54: No, a participant's eligibility for free or reduced lunches is not an approved method to qualify an individual TANF youth programming.

Q55: Can we get clarification on what all would be counted as income for a participant?

A55: Only gross earned income would be counted.

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Q56: Is it possible to send in spreadsheets prior to the end of the month or possibly on a bi-monthly or even weekly basis? Our concern is we may have 5 or 6 youth who come in during the beginning of a month to try to obtain services and then have to wait potentially up to six or seven weeks until they can be deemed eligible, if we wait until the end of the month to send in the spreadsheet and then have another two weeks of turnaround time.

A56: This is a transition period for DHS, L&I, the LWDBs, and their local providers. DHS will re-evaluate the turnaround timeframes for spreadsheet review and response over the next few months. However, this should not impact the youth being served in a timely manner. Regardless of how long the central office takes to qualify a participant, qualification begins the date that the youth applies. However, if the central office determines that the individual does not qualify, the program must be prepared to use alternate funding to cover the cost. The qualification factors are outlined in detail in the manual, so local programs should have a high level of confidence that the participant will qualify to be served with TANF YDP funds at the time of a youth's application.