

CONTRACTOR LETTER #2020-03-16

DATE: 3/16/2020

SUBJECT: COVID-19 Impact and Procedures

TO: Employment and Training Contractor Staff

FROM: Tanoa Fagan, Director
Bureau of Employment Programs

PURPOSE

To provide guidance and procedures for employment and training (E&T) activities with the arrival of COVID-19 (the 2019 novel coronavirus).

BACKGROUND

E&T participants in Pennsylvania may be impacted by COVID-19 also known as the 2019 novel coronavirus. This includes not only individuals who have reported symptoms or have tested presumptively positive for the virus, but also individuals who are caring for a family member or have been impacted by an activity and/or supportive service (such as education, childcare, transportation, employment, etc.) that has been canceled or suspended due to COVID-19.

It is the Department's objective to support participants in continuous engagement in employment and training activities to the extent possible. However, additional guidance is needed to address extenuating circumstances that may either prevent participation or require adjustments in service delivery as a result of potential COVID-19 impact. Our ultimate goal is to maintain the health and safety of all Pennsylvanians during this time. For up-to-date information about COVID-19, please visit:

<https://www.health.pa.gov/topics/disease/Pages/Coronavirus.aspx>

Excused Absences and Good Cause Policy

Under E&T procedures, individuals engaged in unpaid work activities may get participation credit for excused absences for up to 80 hours in a 12-month period, but no more than 16 hours per month. This does not include the 10 countable holidays (New Year's Day, Birthday of Martin Luther King, Jr., Washington's Birthday/Presidents' Day, Memorial Day, Independence Day, Labor Day, Columbus Day, Veterans Day, Thanksgiving Day, and Christmas Day).

DISCUSSION

If a participant has been exposed or potentially exposed to COVID-19 (or any communicable illness), the participant is responsible to contact the CAO or E&T program and make them aware of the situation and inform them if the illness is anticipated to last beyond the excused absence time. If COVID-19 related verification is provided to the E&T contractor, it must also be shared with CAO staff so they may scan it into imaging. Once the E&T contractor has been made aware of exposure to COVID-19, they must contact the Bureau of Employment Programs (BEP) and make them aware. E&T contractor staff must also notify the CAO of potential exposure immediately. Providers must contact the PA Department of Health at 1-877-PA-HEALTH (1-877-724-3258) if they become aware of parties that have tested presumptively positive.

Please do not ask an individual who is reporting COVID-19 symptoms, or other communicable disease, to physically bring anything into the CAO or E&T program buildings. MyCOMPASS PA, the mobile app for benefits issued by the CAO, can be used by participants to send in verifications. Additionally, forms can be faxed/emailed/mailed directly to medical providers and/or the participant; please provide CAO fax numbers and/or resource emails to facilitate receipt of completed forms. *Use collateral contact when possible.*

Individuals should plan to participate to the extent that activities are available and adherence to the COVID-19 guidelines can be followed to maintain good health and minimize potential spread of the virus. This may include remote activities and service delivery. Depending on the internal and external factors impacting participation, the following procedures should be implemented.

Full Office Closures

- a. **If the Governor announces the closure of a location, county or region and your program is located in one of those places, your program is expected to close and adhere to the prescribed guidance outlined.**
- b. Please notify BEP of program closures immediately at RA-PWBEP.TANF@pa.gov.
- c. Providers are responsible for contacting each participant to advise that their office is closed and discuss appropriate employment and training activities.
- d. Remote activities should be the first activity that is introduced to cover participation hours. (See Attachment A)
- e. If remote activities are not an option and E&T provider offices are closed, all participants should be issued excused absence time up until the point of 16 hours for the month. Please record these hours in CWDS as soon as you are able, as access may be an issue.
- f. If all of these activities are exhausted, participants will remain on the roles of the program and null hours utilized. BEP will utilize the initial contact date with our office to denote time periods where the offices were closed.
- g. Program providers will be tasked with reaching out to each participant to ensure that they are aware of the date they are expected to return to the program. Providers are encouraged to utilize multiple methods to ensure proper notification.

Individual Absences

If an individual is unable to attend the program due to COVID-19 related events (i.e. exposure, illness, school/childcare closures, etc.), they are to be given remote activities in an attempt to continue acquiring participation hours in the program. If this is not an option, E&T providers may utilize up to 16 hours in a month of excused absence time. Thereafter, make up plans are encouraged to assist the participant in achieving their required hours. Should they not be able to do so, null hours will be entered for these circumstances.

For parties unable to continue in programming for an extended period of time (more than 14 days absent from the program) due to personal illness or that of a household member, they will be terminated from their current employment and training program. CAO staff should utilize good cause (GC) in these instances and should code these participants as GC 53 to afford them the opportunity to complete forms. The CAO must allow 30 days for the individual to have a licensed medical professional complete a PA 635 Medical Assessment Form or PA 1820 Caregiver Review Form. The GC 53 may be extended, beyond 30 days if an appointment cannot be made within the 30-day window. No sanctions associated with COVID-19 should take place.

New Enrollments

For providers that are NOT in a county where the Governor's mitigation efforts have been enacted, referrals to E&T programs will continue as usual. Program providers should utilize the appropriate protocol based on their local circumstance at that time to service the participant. At minimum, participants are to receive initial contact to discuss programmatic expectations. This can be inclusive of sharing procedures for remote activities.

For providers in counties where mitigation efforts have been enacted, no referrals will take place until the conclusion of those efforts. At that time, providers should follow the above referenced guidance.

Remote Activities, Supervision, and Verification

Daily supervision must be provided by the contracted program. Daily supervision does not mean daily in-person contact. The supervision may be by telephone or electronic contact (email/text) and ensures that the individual participates and progresses in his/her assigned activities. Contracted program staff are responsible to develop a remote participation plan for everyone who will be utilizing this option.

Remote participants must use form [PA 1895](#) to log their activities, to include the date of the activities, type of activity, their E&T case manager's contact information, and the begin and end times for each activity recorded. When the log is completed, the participant must transmit it (via mail, fax, or electronically – pictures are acceptable via phone) to the E&T case manager. Due to the current impact of COVID-19, flexibility will be provided in these circumstances so the PA 1895 can be logged on a separate document and the form completed at a later time.

In addition to online services you may already use, please see [Attachment A: Remote Activity Resource Guide](#) for ideas, videos, and online services that are free to use.

Please also review [Attachment B: Employment, Job Search and Job Readiness Activity Codes](#) and [Attachment C: Vocational Education Activity Codes](#).

If you have any questions about the usage of any activity, or a remote opportunity you would like to seek advice on regarding the coding, please contact RA-PWBEP.TANF@pa.gov.

NEXT STEPS

1. Please share and review with appropriate staff.
2. Continue to monitor the PA Department of Health website and your email for additional updates as circumstances change.
3. This Contractor Letter will become obsolete when incorporated into the program's Operations Manual.
4. Send questions for BEP to RA-PWBEP.TANF@pa.gov.