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Program Guidelines for Community College TANF Programs

**Provided by the
Oklahoma State Regents for Higher Education**

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Oklahoma State Regents for Higher Education

Guidelines and Procedures for Community College TANF Programs

Overview

The Personal Responsibility and Work Opportunity Reconciliation Act (1996) represents only one of several major efforts by the federal government to enhance employment and training opportunities for unemployed adults. The act included the creation of a provision entitled "Temporary Assistance to Needy Families" (TANF). The TANF provisions substantially changed the nation's welfare system from one in which cash assistance was provided on an entitlement basis to a system in which the primary focus is on moving welfare recipients to work and promoting family responsibility, accountability, and self-sufficiency. Subsequently, the Deficit Reduction Act (2005) (DRA) further defined provisions contained in the 1996 legislation in an effort to maintain consistent reporting throughout the country relating to allowable work activities.

Since 1996, the Oklahoma State Regents for Higher Education ("OSRHE") and the Department of Human Services ("DHS") have entered into annual contracts for purposes of allowing State System community colleges to develop, design, and implement, in coordination with DHS county offices, individualized/specialized vocational educational training programs, designed to serve TANF recipients, which best meet employment opportunities within the college's service area.

Application Process and Program Design

Based on the contract between the OSRHE and DHS, community colleges will submit renewal applications on an annual basis as prescribed by the OSRHE. Applications will consist of: a description of the training components offered by the program designed to assist TANF recipients obtain and retain employment; appropriate employment placement procedures; employment follow-up procedures; and, a detailed budget with a narrative substantiating the budgeted amounts requested. **(Note: Institutions are required to provide a 20% match - in-kind is permitted.)** In addition, a signature page must be submitted with the renewal application signed by the college's president. **A list of DHS county directors, business and community partners, and other partnerships (WIOA) within the institutions service area must be submitted with the renewal application. No signatures are required.**

Programs must provide a minimum of thirty-five hours per week (unless prior approval has been given by DHS and OSRHE for a lesser amount) of allowable work activities, twenty of which must be "core" activities – see below. In some instances, local DHS offices may request additional hours (up to forty per week) be offered.

When developing training components competencies must be in place for each of the various training area including Job Skills Training Directly Related to Employment. Each of these training components, including any workshops offered as part thereof, should have an outline listing the specific training and or information that will be presented and the outcomes that will be attained--similar to a course syllabus. Additionally, there must be documented outcomes available in client files for those participating in these training components. Example: For workshops clients could write a paragraph describing what they learned from the workshop and how it related to future employment. Alternatively, pre/post tests could be developed.

In accordance with the DRA, allowable Oklahoma TANF program employment training components may include:

“Core Activities (from which at least 20 hours per week of participation must come)

Activity Category	Federal Definition Under New Rules
Unsubsidized Employment	Full or part-time employment in the public or private sector that is not subsidized by TANF or any other public program.
Subsidized Private Sector Employment	Employment in the private sector for which the employer receives a subsidy from TANF or other public funds to offset some or all of the wages and costs of employing a recipient.
Subsidized Public Sector Employment	Employment in the public sector for whom the employer receives a subsidy from TANF or other public funds to offset some or all of the wages and costs of employing a recipient.
On-the Job Training	Training in the public or private sector that is given to a paid employee while he or she is engaged in productive work and that provides knowledge and skills essential to the full and adequate performance on the job.
Job Search and Job Readiness Assistance	<p>The act of seeking or obtaining employment, preparation to seek or obtain employment, including life skills training, and short-term substance abuse treatment, mental health treatment, or rehabilitation activities for those who are otherwise employable. Such treatment or therapy must be determined to be necessary and certified by a qualified medical or mental health professional. Job search and job readiness assistance activities must be supervised by the TANF agency or other responsible party on an ongoing basis no less frequently than daily.</p> <p>This activity is limited to six weeks per year (no more than four weeks may be consecutive to count toward the work participation rates). Oklahoma has been designated a needy state; therefore, twelve weeks per year is allowable (no more than four weeks consecutive)</p>
Work Experience (Referred to as an Internship in the college TANF programs)	A work activity, performed in return for welfare that provides an individual with an opportunity to acquire the general skills, training, knowledge, and work habits necessary to obtain employment. The purpose of work experience is to improve the employability of those who cannot find unsubsidized employment. This activity must be supervised by an employer, work site sponsor, or other responsible party on an ongoing basis no less frequently than daily.
Minor Parent	Custodial parent participants under 20 years of age without a high school diploma are required to participate in educational activities directed toward the attainment of a high school diploma or its equivalent.

Community Service Programs	Structured programs and embedded activities which TANF recipients perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service programs must be limited to projects that serve a useful community purpose in fields such as health, social service, environmental protection, education, urban and rural redevelopment, welfare, recreation, public facilities, public safety, and child care. Community service programs are designed to improve the employability of recipients not otherwise able to obtain employment, and must be supervised on an ongoing basis no less frequently than daily. A State agency shall take into account, to the extent possible, the prior training, experience, and skills of a recipient in making appropriate community service assignments.
Vocational Education Training Not to Exceed 12 Months*	Organized educational programs that are directly related to the preparation of individuals for employment in current or emerging occupations requiring training other than a baccalaureate or advanced degree. Vocational education training must be supervised on an ongoing basis no less frequently than daily and may include work-focused general education and language instruction.
Child Care for an Individual Participating in a Community Service Program	This is not an allowable activity for Oklahoma TANF recipients at this time.

“Non-Core Activities” (cannot count without 20 hours per week from “core” activities)

Activity Category	Federal Definition Under New Rules
Job Skills Training Directly Related to Employment	Training or education for job skills required by an employer to provide an individual with the ability to obtain employment or to advance or adapt to the changing demands of the workplace. Job skills training directly related to employment must be supervised on an ongoing basis but not less frequently than daily.
Education Directly Related to Employment	Education related to a specific occupation, job, or job offer. Education directly related to employment must be supervised on an ongoing basis but no less frequently than daily. This activity is for TANF recipients that do not have a high school diploma or GED and one is needed for employment.
Satisfactory attendance at secondary school or in a GED program	Regular attendance, in accordance with the requirements of the secondary school or course of study, at a secondary school or in a course of study leading to a certificate of general equivalence, in the case of a recipient who has not completed secondary school or received such a certificate. This activity must be supervised on an ongoing basis no less frequently than daily.

Program participants may combine any of the above core/non-core activities (as long as the “core” activity requirement is met) and is part of recipient’s plan outlined in the TW-2, however, please adhere to the following guidelines on pages 3 - 6:

***Students may be enrolled in approved degree programs that lead to specific employment. All vocational training exceeding 12 months (Extended Vocational Extension) must be accompanied by one or more of the following 20 hour per week core activities: unsubsidized employment; internships; or work-study.**

Vocational Education Extension Guidelines

The DHS Work Component vocational education/training allows TANF recipients to earn a college degree and/or complete a two-year vocational training program at a technology center. The following should be taken into consideration prior to allowing enrollment into a degree or two-year vocational training program.

- ✓ Any extension of vocational education/job skills training must be part of the participant's Employability Plan (TW-2). If the TW-2 and 3 are not specific as to the extended vocational education, **the TANF worker must approve the extended training and the program must request an updated TW-2 with the specific degree or training program indicated.**
- ✓ The degree/program must lead to immediate employment upon completion (some examples would include: accounting, child development, registered nurse, radiography and other health related degrees, business, almost any of the applied science degrees; examples that would not be appropriate – philosophy, history, general studies, psychology; etc. **unless approval has been given by DHS state office and OSRHE.**
- ✓ College coursework toward a certificate program or associate degree (leading to specific employment) is allowable under the DRA regulations.
- ✓ Assessment scores must indicate the client has the ability to succeed in college coursework and/or extended vocational training. **However, as with “regular” college student’s remedial coursework is allowable. Program staff should work closely with the student to ensure remedial course success.**
- ✓ The client must have enough time left on their case to complete the degree or required clock hours for program completion.
- ✓ The client has 12 months for the degree/training program to be considered vocational education as a core activity. The program staff may strategically utilize the 12 months to better serve the client. Additional core activities must be in place to ensure the 20-hour requirement is met. **Study time and homework done within the program classroom may be allowable as a core activity during the first 12 months.**
- ✓ Subsequent vocational education coursework beyond 12 months will be a non-core activity; therefore 20 hours of a core activity must be in place. This can be Work Study and/or work-based education (i.e., internship, worksite training). Study time would NOT be allowable as a core activity in this case since the coursework is a non-core activity after 12 months.
- ✓ Clients must apply for Pell and should be encouraged NOT to take out student loans. If a client is not Pell eligible and student assistance funds are available they may be used, however, **the program should work with the client to help them set up a small payment plan to get out of default.**
- ✓ The program staff should act as the “advisor” for the client to ensure the client does not enroll in more hours than they can be successful. **The first semester at a college site should be limited to 9 or a maximum of 12 hours.**

- ✓ Students may be taking credit courses through contractual agreements with career technology centers whereas the first 12 months of coursework taken at either the technology center or college counts as the “core activity” and subsequent coursework taken at either the technology center or college* would be a “non-core” activity.
- ✓ If a client is close to having the scores necessary to enroll in college courses, it may be possible to use an adult basic education program to bring up the scores prior to enrollment (depending on when referred & when courses begin) rather than the client taking remedial courses. If a client’s scores are deficient in only one area (math for example) he or she may take regular college classes along with a remedial class or while bringing up scores with an adult basic education program. **Remedial coursework must be taken prior to completion of the first 24 credit hours.**

*** If the client completes the first year of the degree/program at the college or technology center and will transfer to the college or technology center to complete the degree/program a referral from DHS (TW-2 & TW-3) will be needed.**

NOTE: A copy of the course syllabus for courses students are enrolled in should be obtained from instructors so that program staff can help students meet deadlines for coursework assignments and prepare for tests.

Program Staff Expectations

Special Projects are charged with the task of implementing the guidelines set forth by the Personal Responsibility and Work Opportunity Reconciliation Act (1996), in addition to, creating and facilitating a support system that allows the target population opportunity to learn effective life skills, self-advocacy and access to resources to remove employment barriers. Self-sufficiency is the ultimate goal.

Due to the extreme situations or needs experienced by some of this population, getting an individual to the point of self-sufficiency can prove to be a time-consuming intensive process. Program staff is involved in helping and advocating for students in various ways:

Driver's Permit/License	Driver's License	DHS Child Support Paperwork/Court
Housing	Justice Involved Issues	Overall Health of Client
Shot Records	High School Transcripts	College Transcripts
Official HSE Records	Loan Default/Repayment	Advocate for IEP @ school
Financial Aid Application	Childcare	Transportation
College Enrollment	Career Tech Enrollment	Mental Health/Substance Abuse
Birth Certificates	Social Security Cards/Issues	Counseling
Domestic Abuse	Dental Work	Retention Services
High School Equivalency		

The Life Skills aspect of the program incorporates numerous topics that are designed to help the target population get and keep a job once training has been completed. Some of the areas covered are but not limited to:

Personal Hygiene	Resume	Cover letter	Time Management
Stress Management	Interview Skills	Self Esteem	Communication Skills
Goal Setting	Financial Awareness	Budgeting	Self-Advocacy
Employer Expectations	Dress for Success	Parenting	Renter's Insurance
Car Insurance	Legal Contracts	Employee Rights	Rental Agreements

Program Staff

At a minimum, each program should have a full-time director and a job skills specialist. **At smaller programs the director/coordinator can assume both responsibilities.** OSRHE and DHS staff may make an exception to this requirement under certain circumstances. Instructors teaching remedial and basic education in a work context are required to have a bachelor's degree. Beginning July 1, 2007, it is expected that all professional staff (directors, coordinators, job skills specialists, etc.) will have, at a minimum, a bachelor's degree, unless an exception has been given by OSRHE.

Prior to offer of employment, the community college shall notify OSRHE and DHS regarding new hires in the role of director and/or coordinator. Upon acceptance of employment the community college will provide transcripts.

Any program staff working with the program that are paid other than from 100% grant funds must keep time and effort reports. These reports should be submitted quarterly and be available at the program review. **NOTE: Program staff paid 100% from grant funds may not perform duties for the college that are unrelated to the program. To do so will cause monies to be returned to DHS on a pro rata basis.**

Work Schedule

TANF program staff will not have the same “work” schedule as the college staff. TANF programs must be offered 12 months per year, a minimum of 35-hours a week. (More than thirty-five hours a week may be offered by the program if requested by local DHS partners.) The programs **will not be “closed”** during regular college breaks. If possible, the program should be operational 40 hours per week.

Program staff must ensure students are supervised, and participating in scheduled and structured activities while out on vacation or extended periods of time. Asking DHS staff to monitor and supervise students during program staff absence is not acceptable.

If program staff is going to be out for an extended period of time, notify DHS and OSRHE of the expected absence. Make sure the “Out of Office” notification is turned on for email, and voicemail. If known, indicate the date of return in your email and voicemail.

If a campus is closed for reasons other than inclement weather, and program staff and clients are not allowed to be on campus, the program staff must find alternative scheduled, structured, and supervised work activities for the clients. Additionally, a program staff member must check, on a daily basis, to ensure the client is participating at the designated alternative location. Notification of any client that is not at the designated site should be given to the appropriate DHS liaison on a daily basis. **(Note: Job Search is not considered an allowable alternative during these periods of time – check with OSRHE or state DHS staff if there are questions regarding allowable activities.)** Listed below are the OSRHE and/or state DHS staff allowable state/federal holidays for the clients and program staff.

Friday July 3 – Independence Day
Monday September 7 – Labor Day
Thursday/Friday November 26/27 – Thanksgiving
Thursday/Friday December 24/25 – Christmas
Friday January 1 – New Year’s Day
Monday May 31 – Memorial Day

If the campus is open on Veteran’s Day, Martin Luther King Day, or President’s Day, it is expected that on-site and off-site programs will remain open and serve clients during these times. If both the campus and state offices are closed, programs will not have to remain open.

If necessary, TANF program directors/coordinators may work remotely, if the staff member has remote access to their work computer/files.

Travel

According to the contract between the OSRHE and DHS, program related travel will be paid in accordance with the prescribed travel laws for the state of Oklahoma. **Out-of-state travel for program staff must be approved by OSRHE and state office DHS staff.**

Note: Even if state travel law would permit a person to spend the night before a meeting (within 60 mile radius of home or worksite whichever is closer) the overnight expenses would not be allowed unless the person could not reach the destination within the time period they would normally leave for the office (i.e., meeting starts at 10:00 a.m. – person usually leaves for office at 7:15 a.m. – can they make the meeting by 10:00 a.m., if not – overnight lodging/per diem approved, if so, no overnight lodging/per diem allowed.)

Program Participant Operations

Participant attendance/participation – The program must offer a minimum of 35 hours of approved work activities of which 20 must be “core” activities. This means that each TANF program is responsible for coordinating a minimum of 35 hours of training/education for each student, or a combination of training/education and other approved work activities that may include actual skills training, remediation, job readiness, job search, work-based training, and structured career exploration of a chosen field of study. Temporary jobs may qualify as part of the work-based learning component of the TANF program. It is imperative that all activities are scheduled to meet work participation rates and other critical program requirements of the DRA.

Allowable Absences for Program Participants – Under the DRA regulations, program participants will be allowed certain holidays and a maximum of 80 hours of excused absences in a 12-month period (no more than 16 hours of which may occur in a month) that will not count against the monthly participation requirement.

If the college is open the student is expected to be in class and participating. The student cannot carry the holiday over to another date. The only time the student will be paid participation pay for a holiday is when both the school and DHS offices are closed and observing the holiday. **Note: excused absences will be defined by DHS policy. Program staff should not make determinations or discuss this with program participants.**

Students may only be “stopped out” of the program for reasons approved by county DHS staff (ex: maternity leave, medical, extensive substance abuse, etc.).

If a substance abuse problem is suspected the program participant’s caseworker should be notified so appropriate action (most likely a UA) can be taken.

Make-up Time – Program participants can make up time for absences including but not limited to, illness, child’s illness, appointments, tardiness, court, etc. within the month the absence occurs. Such time can be made up during lunch hours or before or after the normal 35-hour program participant hours (i.e., during the additional five hours of the 40-hour work week for staff.) Note: Program policy and procedures for reporting absences must have been followed for make-up time to be allowed.

On-line College Courses – On-line courses must be taken at the program where they are supervised or in a lab where someone can verify attendance. On-line courses cannot be taken off-site and count toward program participation. On-line courses must be part of the degree program or specifically related to vocational training and employment outcome.

Employment – For federal reporting purposes, to be counted as “employed” a program participant must be working a **minimum of 30-hours per week at minimum wage or above**. Work study does not count as an employment placement.

Program Participant Dress Code

Based on the new DHS guidelines that may result in more program participants enrolling in college coursework the dress code has been amended as follows for program participants that are taking college courses and not in job search or do not have an internship assignment (current dress code (workplace attire) would apply to those situations):

Participants may wear nice jeans (no holes, tatters, frayed at bottom, etc.) that fit appropriately and do not show excessive wear.

Nice t-shirts may be worn. The following t-shirts would not be allowed – cut-off, frayed or tattered, faded, t-shirts, tank tops, t-shirts with large lettering, logos (unless college), pictures, slogans, etc., or t-shirts with spaghetti straps.

Not appropriate would include any clothes that are too revealing, clothes that don't fit properly, clothes that are wrinkled, tops worn alone that look like lingerie; shirts/tops that show midriff area, pajama pants, sweats or running pants, no short-shorts (in summer knee length permitted w/ appropriate top), shower type flip-flops or beach type shoes.

The goal of the program is still employment so every effort should be made to build a workplace wardrobe while the client is participating in the program.

Carryover funds can be used for clothing (office attire) and in some counties DHS may be willing to use flex funds.

Program Guidelines and Procedures

Program Referral/Entry/Exit

Each DHS county office (as the state contract requires) will identify a liaison to develop and maintain a relationship with the TANF area community college staff and administration. Each DHS county office is responsible for identifying and referring eligible TANF participants to the program.

Potential program participants will be referred by county DHS staff through the development of the TANF Work/Personal Responsibility Agreement, Form TW-2. DHS, in coordination with the local community college, will determine appropriate referrals by means of the Interagency Joint Staffing.

As provided in the contract between DHS and the OSRHE, in order for a client to be referred to a community college TANF program the following items and processes constitute a complete referral:

1. TW-2 - TANF Work/Personal Responsibility Agreement signed and dated by the caseworker and client. (Coordinator files the copy).
2. TW-3 - Interagency Information and Referral Form. (Responses to DHS are made on TW-3. The original copy of the response is kept in student's program file and a copy that includes the response is sent to the county DHS office.) Student records must contain this completed form for audit purposes.
3. Carl Albert State College Assessment results including the CASAS, and OKCareerGuide.

The TW-3 (referral and information form), signed by the participant and the referring worker, with attached copy of a complete TW-2, signed by the worker and participant, should be sent to the community college for those participants most likely to benefit from college education.

Incomplete forms must be routed back to the TANF worker be completed as soon as possible. Each time a student changes, begins, or completes a different work activity a TW- 3 page 2 should be completed and sent to the appropriate worker indicating the work activity, the number of hours of scheduled participation, and dates and times of said activities, or date of program completion or termination.

The TANF client cannot be referred to a community college TANF program as an applicant. The client must be referred as a recipient only.

Program staff should ensure that they have received both the completed TW-2 and 3 forms along with the Carl Albert assessments prior to the client beginning the program. Unsigned and undated TW-2s can be considered an audit exception and could cause monies to have to be returned to DHS. If the client is currently enrolled in college courses, the Carl Albert assessment is not required. Therefore, the reading score for the client should be marked as 9 thru 12 or 12+.

Clients should not be served by the program without a signed and dated TW-2. A TW-3 is

also part of the referral and should be included in the referral paperwork (client signature is not required). Once the client has been accepted into the program (after the 2-week probationary period) the back of the TW-3 (Page 2) should be completed and a copy returned to the appropriate DHS liaison (this form can be scanned and e-mailed to the caseworker). The original remains in the client's file.

Note: If the original TW-2 was not specific as to the work activity the client is to participate in, a case staffing or e-mail exchange between the program and the worker agreeing to the planned activity(ies) should be done prior to the TW-3, page 2 being furnished to the caseworker. This also applies to changes that occur during the probationary period and are not, therefore, on the original employability plan. An updated TW-2 employability plan is required and the client's signature must be obtained.

Anytime a program participant begins agreed-upon work activities that were part of the employability plan, a TW-3, Page 2 must be completed and furnished to DHS (i.e., internship component begins, job search and job readiness begins, etc.). The TW-3, page 2 should always list the days and times the client will be in each specific work activity. It is important that a TW-2 employability plan (page 5 or 6) is returned by DHS. It is suggested the following language be added to the TW-3, page 2:

“Please return a TW-2 page 5 (employability plan) with the updated information. I will have the client sign and fax back to you.”

If a client wants to change work activities from what was indicated on the TW-2 employability plan, a case staffing with the worker and the client should take place. It is not appropriate for the program staff to approve that change without input/approval from the caseworker. If and when the caseworker approves the change a new TW-3, page 2 should be submitted to the caseworker.

Additionally, a TW-3, Page 2 should be completed and forwarded to DHS upon a program participant's employment or upon the program participant's exit from the program for reasons other than employment (the reason, if known, should be included). **When the program participant becomes employed, the program staff should ensure the same information is collected as is included in the DHS form ADM-92. This will alleviate duplication of employer contact.**

Probationary Period

The programs can have a probationary period of two weeks to determine whether the client will be accepted into the program. During the probationary period it would be appropriate to do some career exploration using the OK Career Guide to ensure that the client is going into a training component that matches with their interest and abilities and offers employment opportunities within the community upon completion.

Once the client has made probation and been accepted into the program, the program is financially responsible to pay for all fees associated with education and employment.

It will not be necessary to have a probation period for clients that are already enrolled in college courses that are referred to the program. If the program receives a referral for a college student that is already enrolled in a degree program that has been approved by the caseworker, even though it may not be one that would be considered appropriate by the guidelines – leads to employment upon completion - i.e., psychology, it is permissible to accept them into the program based on the referral.

Any new referrals to the program for a degree that does not typically lead to employment should be staffed with the worker and the client and then be approved by DHS state office.

Program Plan

A program plan, that is signed and dated by the client, should be developed for each client upon entering the program. This plan should be individualized for each client based upon the training to be received along with appropriate program work activities identified/needed by the client to lead them to program completion and employment. Appropriate documented outcomes (pre-post test scores, surveys, etc.) relating to the program plan should be maintained in the client's file. The plan should have the same intended outcomes as the Participant Agreement/Employability Plan contained in the TW-2.

Time Sheets (TW-13)

The program director or designated staff must sign off on the client's TW-13 (DHS Time and Attendance Report form) and ensure that the client progress box has been completed. Copies of the TW-13 should be kept in the client's file. Additionally, it is the responsibility of the program to ensure that the TW-13s are furnished to DHS in accordance with local DHS procedure.

If the client participates in other allowable work activities (counseling, GED, substance abuse treatment, etc.) a separate time sheet should be completed for that activity signed off by a person associated with the appropriate entity and attached to the client's TW-13. The program director or staff should only sign the TW-13 for verifiable hours the client participated at the program site. A separate time sheet should be developed for the internship site and signed off by the worksite supervisor. That time sheet would then be attached to the TW-13. **Time the client is taking college courses should be included on the TW-13 along with time the client is in the program classroom.**

Case Staffings

Some examples of when a case staffing should be scheduled include: (1) when there is a problem with a program participant (attendance, attitude, suspected drug use, etc.); (2) a program participant wants to change their employability plan; (3) the program participant does not seem to be making progress and their attendance is good, (4) medical or family issues; and (4) other situations that may arise. **The case staffing should include the participant, one program staff member, and the caseworker. The staffing can be conducted by conference call if the worker is unable to come to the program.** Depending on the circumstance it may be necessary to enter into a plan of action with the participant and if not followed the participant would be referred back to DHS.

Internships – This component is a core activity and can be offered 20 or more hours per week.

Every effort should be made to ensure that clients have an opportunity to "intern" at a job prior to full-time employment. This will allow the client to relate received training to the workplace and to address any workplace problems that might impact a client's success at full-time employment. However, it is important to not place a client into an internship position before they have enough confidence and basic workplace skills to benefit from the experience.

If the client is not work ready for the private business sector it is suggested that the client begin in a non-profit setting. It is important that the internship site correlates to the training

being learned in the classroom (i.e., if the client is learning legal office then an attorney's office would be an appropriate internship site, etc.).

An internship agreement must be entered into between the client and the internship site outlining the internship schedule, duties to be performed, and skills that will be gained during the experience. The agreement should also contain a non-discrimination clause as well as liability language stating the client has medical coverage through the Oklahoma Health Care Authority. Additionally, evaluations completed by the internship worksite supervisor should be completed on a regular basis.

Note: Internship hours must comply with the requirements listed above. Additionally, internships should have a specific end date, typically not more than 30 days at one place, but may be extended for additional 30-day periods if there is intent to hire in the near future. Internships at one site should not exceed 90 days total. **If there is a need for a client to stay in an internship beyond 90 days, an exception request should be made to DHS and OSRHE state office representatives.**

Job Readiness

Previously job readiness skills were considered part of vocational training. Under DRA regulations this is not allowable. Certain job readiness skills such as interviewing skills, resume preparation, and other job readiness skills will now fall under Job Search and Job Readiness Assistance and are limited to twelve weeks per year and **cannot exceed four consecutive weeks**. NOTE: for federal reporting purposes - one hour of Job Readiness and/or Job Search activity per week is equal to one week of participation. Therefore, programs should offer the Job Search and Job Readiness component upon completion of vocational training in order to ensure the program participant is afforded the opportunity to maximize allowable Job Search and Job Readiness training time.

Additionally, if a TANF recipient has completed 30 hours of core/non-core activities the additional 5 or more required hours of program attendance can be spent on job readiness activities and not be counted toward the twelve-week limitation since it is over and above the federal mandate.

Once a participant enters a job search component, it is important the component still meets the scheduled, structured and supervised requirement. It will be necessary for a daily structured plan with timelines be followed for each participant. (The participant should not be allowed to be "on their own" for a day of job search.) The participant should have a daily schedule to follow that outlines which employers will be visited for purposes of completing an application. Appropriate documentation should be obtained from each employer (a TW-10 or similar form can be used).

If possible, the participant should stop by the program before going to employers for job search to ensure appropriate dress and documents (resume, portfolios, etc.)

Job Readiness Only

Under the DRA regulations Job Search/Job Readiness is limited to twelve weeks per year and no more than four weeks consecutively. Program participants cannot remain in a job readiness only component longer than four weeks. If the entire four weeks is used in the job readiness only component, they will need to be placed in a work experience or other activity(s) to meet participation rate for at least one-week before beginning job search as part of the program or with DHS.

Allowable Time for Job Search

The participant should keep a time log of when they arrive and leave each employer for file documentation and TW-13 purposes. Actual time spent on completing application is allowed (within reason) at each employer. Reasonable drive time between employers is allowable. It is recommended that one (1) to one and one-half (1 ½) hours can be allowed for an interview. It is anticipated that the participant will spend the remainder of the day at the program before and/or after making employer visits.

Substance Abuse/Mental Health Counseling

These services fall under Job Search and Job Readiness assistance and therefore is limited to twelve weeks per year with no more than four consecutive weeks.

Basic Skills

Under the DRA regulations, basic skills education is allowable as vocational education not to exceed 12 months when embedded within a vocational education training activity as long as it is of limited duration and is necessary or a regular part of the vocational education training.

Programs that do not have a TANF funded HSE/GED or Literacy class in their area has approval to utilize a HSE/GED program in the classroom to assist participants with overcoming an obstacle. The participant needs to enter the program with a CASAS score of 8th grade or above. No more than 25% of the class can be HSE focused, as the program needs to maintain the ability to serve full time students. It is the expectation that these participants will earn their HSE/GED within six months. Once the participant has made probation and been accepted into the program, the program is financially responsible to pay for all fees associated with education. The participants will be coded HSE and will not count against the 12 core education months.

Note: If basic skills is not a part of the vocational training component it would be considered a non-core activity and if the recipient did not have a GED it would be allowable under the education directly related to employment activity; if the recipient did have a high school diploma or GED and needed some “brush-up” in the area of basic skills for employment purposes it would count in the job skills training directly related to employment category.

Employment Verification for DHS and Employment Follow-up

Since the programs are required to obtain employment verification information and DHS is also required to obtain employment verification information, it has been determined that it would be best for the programs to be responsible for employment follow-up information. This will alleviate the need for DHS to also confirm employment. A form with necessary information that DHS needs for verification should be used. Examples have been sent by OSRHE and can be adapted to fit individual programs. (See example under employment verification tab.) In most instances, the student should not be the one that is taking the form to get it completed. Mail or email/scan the form to the appropriate HR person for completion and have returned and then forward to DHS. They are needed back quickly to DHS so have ready to go as soon as the student has become employed.

The job skills specialist is responsible for six months of employment follow-up portion of the program. **Follow-up is to be initiated once a week the first month, twice a month for months two through four and once a month thereafter.** Of course, if based on a particular client/employer it may be more or less frequently – but a minimum of monthly.

Program Advisory Committee

Each program should have an advisory committee that meets at least once a year. The purpose of the advisory committee is to ensure community support for the program. The committee may contribute and help evaluate the program and its services as well as provide links to internship placements and possible job opportunities.

The advisory committee should have representation from the community partners involved in serving TANF clients as well as business owners, temporary staffing agencies, and former clients, if possible.

Program Reports for OSRHE

In order to help in program evaluation and federal and state reporting, programs are required to collect certain information. An individualized training tracking form has been developed by the OSRHE office to maintain the necessary data. The form is an excel spreadsheet that includes the appropriate client demographic information as well as specific vocational training, initial employment and six-month employment follow-up information. The tracking form should not be reformatted in any way by program staff.

When a client enters the program, after completing the two-week probationary period, (based on the back of the TW-3 being completed, signed by a program staff member, and furnished to DHS) the client's information should be added to the monthly tracking form. The monthly tracking form should be kept up-to-date with appropriate client information added when applicable. It is important to use the "codes" that have been developed for the reason that the client leaves the program and for employment tracking – they are in the appropriate drop-down box in the spreadsheet.

The tracking form should be uploaded to the OSRHE office, through the OSRHE – Secure Access File Exchange (O-SAFE) system, on a monthly basis—no later than the 5th of each month.

Once a client has been placed on the tracking form the information for that client should remain on the tracking form, regardless of program status (i.e. if a client is dropped from the program or completes being tracked for six-month employment), until the beginning of the next fiscal year.

At the beginning of the fiscal year--July 1, a new tracking form will be provided by OSRHE if updates or changes have been made. If updates or changes are unnecessary a new tracking form should be created from the one currently being used (**re-name the file before beginning this process**). The new form should include only those participants who are being tracked for six-month employment retention, are currently participating in the program, and those who may become employed within six months of leaving the program. All other participants can be deleted from the tracking form. Those institutions that provide 12 months of follow-up may leave client information on the tracking form in order to collect necessary follow-up information for months 7 thru 12.

Enrollment and Grades Report

Additionally, programs will track, on a separate spreadsheet, furnished by OSRHE, enrollment & grade information for college students, short term training, and non-credit bearing training. These tracking spreadsheets should be created each semester for any student enrolled in college coursework, short-term training or non-credit bearing training for the semester. At the

end of each semester credentials are recorded for students who have earned an AA/AS or AAS degree, College Certificate, Non-Credit Bearing Certification, or Competency Based Education (CBE)

AA/AS- meets all degree completion requirements

AAS- meets all degree completion requirements

College Certificate- is an 18+ credit hour certificate that is recorded on a transcript, and could lead to employment.

Non-Credit Bearing Certification- refers to *CLOCK* hour only based training. To count as a credential, it must meet the following criteria:

- A. The student has completed the training requirements, and has taken and successfully passed a state exam to earn the certificate. (Additional or embedded certificates that are earned may not count)
- B. The certificate earned leads to employment, (Ex. CNA, LPN, etc...)

Technical Skills Certificate (TSC)- refers to the Universal Classes or a combination of credit hour and universal courses.

REQUIREMENTS FOR THE TSC

- Universal Class: "Customer Service One-on-One", with a pass rate of 75%
- Microsoft Office
- Basic Writing
- Elective of Choice (Financial Literacy can be taken for the elective)

This report is due the end of the week after grades are posted for the semester. It should be emailed to OSRHE or uploaded through O-SAFE.

Previous years tracking spreadsheets should be kept for program auditing purposes.

Programs will also be e-mailed at the end of the year requesting end of year data that is not tracked on the enrollment and grades report or tracking report. Programs may be asked to furnish other reporting information throughout the year to assist OSRHE and state DHS staff in analyzing programmatic issues.

Budget Process

A detailed budget, consisting of specific line item amounts, an indication of the college's 20% match, and a budget narrative will be submitted with the renewal application on an annual basis. A budget review process will take place wherein staff from DHS and the OSRHE approve budgets submitted with agreed upon items/amounts for funding programs. Once a program budget is approved, any budget revisions (transfer of money from one category or line item to another) must be requested via e-mail and approved through the OSRHE. Each program will designate a minimum 10% of the federal award amount toward student services. Note: monies from programmatic line items may not be transferred to personnel or administrative line items.

If the institution officially announces a salary increase or a stipend after the budgets have been approved, a request for approval must be made to the Special Programs Manager. The institution is responsible to cover the increase/stipend if not approved by OSRHE Special Programs Manager and DHS through the remainder of the fiscal year.

Increases not approved by OSRHE and DHS may be denied for future fiscal periods. All increases are dependent upon annual funding and sustainability. Notifications of the institutional increases/stipends must come from the Office of the College President and sent to

the OSRHE Special Programs Manager and DHS for approval.

Should there be money in the contract between DHS and the OSRHE that has not been obligated, and if the need arises for additional money to be added to a program budget, a formal request can be made to the OSRHE office **in writing by e-mail**. The request should include justification for the increased amount needed. OSRHE will review the budget increase request and a written response, by e-mail, will be provided to the institution within 15 days.

Record Retention

13-38 Special Programs Funded by Department of Human Services (Confidential 20 U.S.C. Section 1232(g))

Description: File contains student enrollment information, Department of Human Services (DHS) required forms (TW2, TW3, TW13), Carl Albert State College Assessment (CASA) Results, transcripts, resumes, student schedules, certificate plans, degree plans, and correspondence. These records are subject to audit by Oklahoma State Regents for Higher Education and the Department of Human Services.

Volume: less than one (1) cubic foot per year

Disposition: Retain in office seven (7) years after Department of Human Services (DHS) makes final payment and all obligations are completed, provided all audits have been completed and all applicable audit reports have been accepted and resolved by all applicable federal and state agencies and provided no legal actions are pending. If legal action is pending, destroy two (2) years after exhaustion of all legal remedies, provided records meet all stipulated retention requirements.

Added to schedule, July 25, 2019

Program Site Reviews

Program site reviews will take place annually (or more often if necessary) by OSRHE and state office DHS staff for purposes of assuring adherence to program goals, objectives, financial compliance, and any needed technical assistance. Local DHS staff will be informed of the review and program staff should invite other appropriate community partners to attend as well. A review form will be furnished to the program prior to the review. The form should be completed prior to the review and copies should be available for those in attendance. Program participant files and financial information should be available for review by state office staff.

Program Retention Rate

It is expected that programs will have at least a 75% program retention rate, 75% job placement rate (of program completers), and 60% six-month job retention rate. Failure to meet these standards could cause the program to be in jeopardy of future funding.

- Each program must have written program guidelines that address specific program policies and procedures, including sexual harassment, and ensure that each client has been furnished a copy of their own. **A verification statement should be signed by the client that they have (1) received a copy of the guidelines, (2) read the guidelines, (3), had an opportunity to ask questions about the guidelines, (4) understand the guidelines, and (5) will abide by the guidelines. A copy of the verification statement should be kept in the client's file. It is best to give the client 3 days to read the program**

guidelines and have an opportunity to ask questions. The program director (or staff) should ask the client if they have any questions prior to obtaining signature on the verification statement.

Community Relationships/Partnerships

It is expected that programs will develop relationships within the community with various supportive entities to assist TANF clients with unforeseen needs or crisis situations. A list of entities and phone numbers should be available to the clients for reference purposes. Below is a suggested list of various community resources, however, they should be community specific.

Community Organizations

Local governments	Child care providers
Chambers of Commerce	Business and industry libraries
Social services providers	Volunteer organizations
Civic clubs	
Non-profit organizations	

Health, Food, Shelter, Clothing, and Emergency Services

American Red Cross	Medical providers
Churches and other faith-based organizations	Planned Parenthood
City/county health departments	Rape crises center
Community Action	Salvation Army
Community development block grants	Suicide prevention center
Habitat for Humanity	Tenant's rights organizations
Legal aid	Tribal entities
Local housing authority	United Way

Support Groups

- Alcoholic Anonymous
- Narcotics Anonymous
- Family Counseling Services
- Others Within the Community

Expenditures

Grant funds may only be spent on approved budgeted items. Any questions regarding appropriate expenditures should be e-mailed to DHS and OSRHE state office representatives.

Student Assistance Expenditure Request Form

This form and the following requirements will need to be completed for all expenditures.

Expenses related to health, dental, insurance, car repairs, legal fees or fines, housing/utilities, etc. will need to have a **copy of the expense** with student's name and information concerning the expenditure requested. (Dental and vehicle repairs require up to three quotes before approval determined.)

Expenditures will be broken up into three groups with three different requirements.

- Under \$100: No notification or action is necessary. Please document in house.
- \$100 – Under \$250: Send notification of expenditure to state staff and include completed form below. No approval is needed.
- \$250+: Email OKDHS and ODCTE state staff for approval and include completed form below. ***Please allow up to 5 business days for response from state staff.***

- 1) Date of request
- 2) Name of student and student's case number
- 3) What is expenditure? Amount being requested? (Attach verification)
- 4) Student's program of study / length of time in program
- 5) Number of times student has been assisted by program thus far (list date, reason, and amount)
- 6) Student's attendance and progress in program thus far
- 7) Have flex funds been requested from DHS? When and how much? (Not required for legal fees or fines. Definitely need prior to dental services beginning.)
- 8) Has student made arrangements or attempted to resolve issue?
- 9) Other pertinent information

*See appendix for form

Allowable FY21 Expenditures

- Interview clothing, uniforms, shoes, clothing to meet the dress code for the work component, and special job-related equipment, such as tools, can be purchased with grant funds. However, it is recommended that DHS, other partner agencies, and local clothes closets be contacted to see if a partnering arrangement for supplying the necessary items can be developed.
- Programs may purchase undergarments to ensure that they fit appropriately.
- Universal Class and Ed2Go courses are an allowable expenditure if they will lead to employment or will help in college coursework.
- Purchase of curriculum is an allowable expenditure for training taught within the program by program staff (i.e., for non-certificate or degree seeking students).
- For college students' calculators for math classes, paper for reports, report folders, and other supplies needed for coursework would be allowable expenditures.
- Dental work for a participant that is necessary for health and/or employment may be paid from the grant. Program staff should first check w/DHS (e-mail request - copy in the file) to determine if flex funds are available and/or arrange for cost sharing.
- Any equipment or other tangible materials directly and/or specifically purchased with funds provided through this contract and previously approved for said purchase by DHS shall remain/become the property of DHS. Upon termination or cancellation of the contract, for any reason, DHS may demand delivery/return of such equipment or materials at OSRHE's sole cost and expense. OSRHE shall notify DHS prior to relocation or substantial alteration of such equipment or materials. Inventory may only transfer to another TANF program if the TANF program is discontinued.
- OSHRE and DHS require all federally purchased equipment and supply above \$500.00 be approved by OSRHE and DHS, and reported on the TANF program inventory and kept within the TANF program for which it was purchased for the life of the item. Federal purchases over \$500.00 listed in General Supplies, Durable Supplies, and Books and Periodicals need to have receipts attached when invoicing.
- Fines and fees related to criminal offenses may be paid from grant funds on a case by case basis with approval from DHS and OSRHE.
- Drug testing fees may be paid from the grant only if required by a potential employer. Additionally, background checks required for employment can be paid by the grant.
- Major car repair, driver's license lessons/testing fees/reinstatement can be paid from grant funds but should be on a case-by-case basis and discussed with OSRHE and/or state office DHS staff before making a decision. Prior to grant funds being utilized; obtain documentation to verify client's ownership of vehicle.

To be eligible for automobile repair, the automobile must be owned or co-owned by the participant, his or her spouse, or the participant's parent when the participant is younger than 21 years of age."

- Utilities may be paid from the grant with approval from DHS and OSRHE. Prior to grant

funds being utilized; obtain documentation to verify client's name is on the utility bill and on lease/rental agreement or mortgage.

- Grant funds may be used as incentive items for gas or clothing vouchers. **A log should be kept of who the card is given to and then the student should return the receipt and sign it. The receipts should be kept with the log and will be reviewed at the annual program site review.**
- Grant funds may be used to purchase PPE (Personal Protective Equipment) for the programs due to the current pandemic.

Unallowable FY21 Expenditures

- Food, field trips that are not employment related, and items for client's children are some examples of **unallowable** expenditures.
- Payment of students' enrollment and fees in lieu of utilizing Pell Grants or Scholarships. (eg. Student expects Pell Grant and funds are delayed, program cannot pay enrollment and fees so student can utilize the Pell Grant in other ways.)
- Also included in the unallowable expenditure category are: water service, marketing/promotional items such as pens, cups, key chains, etc.; serving products such as paper/plastic ware.
- Counseling is not an allowable expenditure/use of grant funds. The program participant's medical card should be used. In instances where the medical card does not cover counseling, permission must be given by OSRHE and state office DHS staff to use grant funds. Other alternatives (community partners, flex funds) should be exhausted first.
- Grant funds may not be used for household items or items purchased from self-employed consultants. Additionally, items should not be purchased from specialty shops unless it is the only option due to size constraints and approval from OSRHE/DHS is needed.
- Program staff cannot teach courses for college credit for TANF students.
- Transportation costs to take children to and from child care may not be paid from program funds.
- Grant funds cannot purchase PPE for students' households.

Carryover Funds (this applies to Carl Albert, Murray, NEO, OSU-OKC, Rose State, and WOSC only).

- Expenditure of carryover funds (**for programs that have money attributed to the fee for service contract in 1999-2000**) must be approved by the **OSRHE and DHS Office**. An e-mail request should be submitted stating the purpose of the expenditure and the amount of funds expended. Carryover funds can only be utilized for direct program use. It is the expectation that programs will spend down carryover funds as soon as possible.
- Invoices attributable to carryover funds must be kept in a separate file than the invoices that will be submitted monthly for cost reimbursement from grant funds.

Program Cost Reimbursement/Invoice Procedure

The contract between OSRHE and DHS is a cost reimbursement contract and allocated funds are not “carried over” year to year.)

Grant Funds

As stipulated in the contract, community college programs will be funded and paid monthly on a **cost-reimbursement structure**. Only costs incurred that can be shown to directly relate to the TANF program and have supported documentation (and specifically related to the approved budget) will be reimbursed by DHS. OSRHE and DHS state office staff may disallow expenditures that are only partially or indirectly related to the TANF program or do not have sufficient back-up documentation.

All goods and services purchased by the grant must be tax exempt.

Every effort should be made to ensure monthly invoices are submitted to the OSRHE office **no later than the 10th of the month**. An invoice cover page should be included along with all supporting documentation (copies of invoices, travel claims, phone bills, etc.). There is a likelihood that invoices submitted after the due date will not be processed until the following month. Monies will be transferred to the institutions from the OSRHE office once received from DHS.

Additional Program Requirements/Clarifications

- *The programs that have a “TANF Program” website shall include the DHS Logo on its website and on all printed materials to indicate services are provided in coordination with DHS. The DHS Logo may be obtained from the DHS website at: <http://www.okdhs.org/library/news/mk/Pages/logos.aspx> or by navigating to the DHS website at www.DHS.org, select Newsroom and select Logos. Size selection and placement of the logo on materials or website should be appropriate as determined by State DHS & Regents office. Records of use of the DHS Logo should be maintained by the program and be made available for review at the discretion of DHS. Programs are not authorized to modify the DHS Logo or to use in any inappropriate fashion. DHS bears no costs associated with the contractor’s placement or use of the DHS Logo. Upon DHS request, termination of the contract with the State Regents or expiration of the contract, the Contractor will remove the DHS Logo from its website and cease production of the DHS Logo on printed materials. DHS solely reserves the right to determine enforceability of this clause. The program must use the logo on any brochures/flyers about the program. Said materials must be approved by State DHS office and State Regents representatives.*

Achievement Bonuses

- TANF recipients participating in TANF Work are eligible for bonuses related to achievement of certain goals when funding is available. TANF recipients may receive one bonus payment per achievement, for activities in (A) of this paragraph.
 - (A) Achievements are completion of a:
 - (i) high school diploma;
 - (ii) general educational development certificate (GED), (HiSET)

