

TANF Education and Training

Pennsylvania's KEYS Program



APRIL 2010 | Josh Bone

The Pennsylvania Keystone Education Yields Success (KEYS) program assists parents receiving TANF or SNAP (food stamp) benefits who are in certificate or degree programs at Pennsylvania's 14 community colleges. Individuals are referred to KEYS by the human services agency, though many "self-initiate" their enrollment at community colleges and are later referred into KEYS by local welfare offices. Each KEYS student receives support and guidance from a "KEYS student facilitator," who is an employee of the community college paid through grants to the college from the state welfare agency. When a student enrolls, the facilitator helps the student identify potential career goals in fields with available jobs that pay family-sustaining wages. The facilitator also helps the student design a course schedule appropriate for meeting those goals and assists with financial aid applications and transportation and child care arrangements. The facilitator maintains open lines of communication with state Department of Public Welfare (DPW) county assistance workers to ensure that the student receives essential services. DPW's Special Allowances for Supportive Services (SPALs) can pay student registration fees for education and training programs and provide students with transportation and child care assistance, books and school supplies, and clothing and uniforms. Although the Pennsylvania TANF program as a rule does not pay tuition, in rare cases, when a student is expected to qualify for financial aid shortly, the program will fund up to two courses while the student's financial aid situation is being resolved.

While KEYS originally funded only the pursuit of two-year Associate degrees, KEYS students can now pursue a range of shorter-term options, including one-year certificate programs and credit-bearing short-term programs that lead to the acquisition of marketable skills. KEYS participants have 24 months to complete their studies, although they can apply for at most two six-month extensions under extenuating circumstances. Applications for extensions are evaluated on a case-by-case basis. At the outset, most KEYS students were TANF recipients, although colleges were permitted to fill up to 17 percent of KEYS slots with SNAP-only participants. DPW recently removed the 17 percent limitation and allowed colleges to enroll all SNAP-only clients who were previously on waiting lists.

By The Numbers

- **Year started:** 2004
- **Approximate number of participants:** 1,000. There is no legal limitation on the number of students KEYS can serve.
- **Approximate annual costs:** \$3.5 million
- **Performance measures:** According to data compiled by KEYS program administrators, the average hourly salary of KEYS graduates is \$14.77, compared to under \$8.00 an hour for former and current participants in other DPW programs.¹

¹ The average hourly wage number was calculated using data from the subsidized child care database, which has a very high income limit in Pennsylvania (235% of poverty line); thus, the real average hourly wage for KEYS participants is likely to be even higher, as registered nurses and others who pursue more lucrative professions may have incomes that exceed the 235% bar.

KEYS and TANF Work Requirements

Recognizing that KEYS students cannot complete two-year degree programs within the 12 months that federal regulations allow vocational education to be counted toward a state's work participation rate, Pennsylvania allows TANF parents in the KEYS program to count vocational education as their "core" TANF work activity for 24 months. For the first 12 months, KEYS participation can count towards the state's federal work participation rate requirement as vocational education. After that point, the state cannot count these students toward the federal work participation rate in vocational education. The number of KEYS students who are between months 12 and 24 is small enough that the impact on the state's work participation rate is negligible.²

Pennsylvania also uses creative ways to help students who will reach 24 months of participation before completing their programs. As described earlier, Pennsylvania provides extensions for extenuating circumstances. The state also counts internships and practicums as "work experience" or "job skills training," as permitted under federal TANF regulations. Thus, if a nursing student can complete prerequisites and classroom training in the initial 24 months, the student can count nursing clinics in these categories.³ Pennsylvania recently introduced a new core work activity, vocation-specific work experience (VWE), which pays KEYS students who are engaged in internships and practicums while still counting them toward the federal work participation rate in "work experience." This money is treated as earned income for TANF eligibility purposes, although DPW does provide the state's standard 50 percent disregard.

TANF Work Participation Rates

States face financial penalties unless they engage 50 percent of adults in families receiving TANF-funded assistance in a limited number of countable work activities for a specified number of hours per week. Education and training activities only count toward these hours to a certain extent. No more than 30 percent of individuals counting toward a state's work participation rate can be counted in vocational education or high school attendance (for minor parents), and no individual can be counted as participating in vocational education for more than 12 months. After those first 12 months, hours spent in education and training programs can count as job skills training or education related to employment, but only when combined with at least 20 hours of participation a week in employment or another core TANF work activity.

The Deficit Reduction Act of 2005 (DRA) for the first time imposed the work requirements on recipients of assistance funded with state-only money that is claimed toward the TANF maintenance of effort requirement, and it made other changes that effectively increased the work participation rate targets that states must meet. Additionally, the regulations implementing the DRA require that all hours of participation be verified and documented, which poses significant challenges to institutions educating TANF participants. For more information on the TANF work participation requirements and the changes made by the DRA, please see *Implementing the TANF Changes in the Deficit Reduction Act: "Win-Win" Solutions for Families and States*, available at www.clasp.org/WinWin.

As a result of these restrictions, and a general "work-first" approach, many states allow only very limited access to education and training for TANF recipients. However, some states have found ways to work within the federal requirements and provide valuable educational opportunities to parents receiving TANF. This brief is one in a series that profiles promising approaches to supporting education and training programs under TANF in spite of the limits imposed by the federal rules.

² Note that states can avoid any impact at all on the work participation rate by using solely state funds (not claimed for the TANF maintenance of effort requirement) to provide assistance.

³ Note that federal TANF regulations allow anyone who spends at least 20 hours a week in a core work activity, such as "subsidized employment," to count hours of school attendance as "job skills training," which is not subject to the 12-month cap.

Documentation and Verification Requirements

DPW has instituted a system for documenting and verifying hours of work participation for KEYS students. Each student has a schedule, which includes classes, study time, any additional supervised study hours, and all other hours spent in countable activities. For supervised study, the college designates one or more locations on campus, such as the library, where supervisors are present. Students indicate on their schedules how many hours of supervised study they will complete at one or more of these sites during the week. Students need not sign in or out at any of these sites and no site supervisor signatures are needed. Instead, at the end of each week, students sign their schedules to attest to their accuracy and submit them. These requirements apply to all KEYS students, not just those whose hours can count as vocational education.

KEYS facilitators still spend a large amount of time dealing with documentation and verification requirements. This is partly because federal regulations require that hours be documented and verified in very specific ways, meaning any mistake on a form can cause the hours to become uncountable. Overall, however, the KEYS documentation and verification system has reduced the amount of staff time needed to meet federal requirements and has increased the number of documented and verified hours of participation.

Crucial Innovations

Pennsylvanians involved with KEYS agree that the facilitators are the most crucial aspect of the program. Student facilitators occupy a middle ground between college administrator and welfare office employee. Their ultimate goal is to make the program as successful as possible for students, and they are able to work closely with the state and local TANF agencies to accomplish this. Because students see the facilitators as allies or even advocates, they are comfortable approaching the facilitators with questions and concerns. Because the facilitators know the students, the facilitators are able to anticipate problems and find solutions before students' studies become derailed. The level of trust between KEYS students and their facilitators is a huge factor in the success of the students and the program.

KEYS has found compelling ways to tell its participants' stories. In order to bolster support for the program in the legislature, KEYS undertook a study of participants' wages. In addition, KEYS holds an annual public celebration for all students who will soon graduate and have distinguished themselves in the program. The state senators and representatives from each honoree's district are invited to the ceremony, and most attend, regardless of party affiliation. KEYS administrators, with the help of a state representative, also created a DVD about student experiences that was widely distributed to public officials and advocates. When asked on the DVD about their typical days, single mothers tell of waking up at 4 a.m. and going to bed at midnight, with no breaks, because they see education as their ticket out of welfare. According to KEYS administrators, such stories disprove the ideas that education and training is an easy way out for TANF recipients and that TANF recipients are unmotivated. As a result of these efforts, many in the state legislature and elsewhere believe that KEYS works.

KEYS has developed an effective and reasonably unobtrusive system for documenting and verifying hours of work participation. The schedule system described above increases the number of hours of work participation that are actually counted, helping Pennsylvania improve its work participation rate. Additionally, the

system eliminates the need for students to provide sign-in sheets to teachers before and after classes, a potentially stigmatizing requirement that can deter potential participants and decrease program retention.

Challenges

KEYS continues to struggle to increase its enrollment. KEYS enrollment has remained relatively constant. When individuals in Pennsylvania sign up for TANF and are determined to be “work-ready,” their caseworkers most often refer them to private sector job search contractors, although an exception is made when a new TANF client knows about KEYS or another program and asks to be referred to that program instead. As is the case in many states, Pennsylvania used to take a “work first” approach that emphasized job search and job placement as the primary activity for TANF clients. As a result, there were probably potential KEYS students who were never referred to the program. However, in light of high unemployment and an extremely tight job market, DPW recently implemented new rules and procedures designed to ensure that all TANF clients statewide have access to information about the many options available to them and can move from job search into other programs. These changes may result in higher KEYS enrollment. In addition, DPW is exploring avenues for KEYS to provide new and more diverse options for TANF clients through the community colleges' shorter term programs. When these new options become available, they should also increase enrollment. KEYS is modified continuously as outcome data and participant feedback are analyzed.

Like many community college-based programs, KEYS faces the challenge of underprepared students but continues to try to increase the number of students who can succeed. Many of the students seeking to participate in KEYS have been out of school for some time, and/or performed poorly while in school. KEYS offers these students many academic supports including developmental courses, study and life skills workshops, tutoring, other programs such as ACT 1014⁴ and New Choices Career Development⁵, and mentoring. While these services are helpful to students who have academic skills but lack some readiness, they do not help students who require support at the basic level—in literacy, ESL, and education leading to a GED. DPW is considering implementing a six-month “up front” component to KEYS, allowing students to enroll in KEYS but engage in preparatory work and career exploration/skill assessments prior to selecting a program at a community college. Such a component would allow students to fill their skill gaps and explore the full range of options available to meet their individual life circumstances. The proposal currently on the table would not count this six-month period toward the 24-month state vocational education maximum.

Pennsylvania has another program, Move-Up, that provides TANF recipients with literacy and English language skills and education leading to a GED. Although Move-Up students previously faced some logistical barriers to moving into KEYS, efforts are underway to create more effective pathways that will allow Move-Up graduates to enter the KEYS program.

KEYS has struggled to expand outside community college-accessible areas. While the community college model is effective for those regions with community colleges, residents in half of

⁴ Act 101 is a Pennsylvania Department of Education program that provides tutoring, counseling, and other services to students whose cultural, economic, and/or educational backgrounds might present barriers to postsecondary success.

⁵ New Choices Career Development is a Pennsylvania Department of Labor and Industry program that provides life skills training and job counseling to low-income individuals. New Choices encourages students to further their education, since education is key to achieving employment goals.

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Pennsylvania's 67 counties lack access to a community college. Although many of the underserved counties have four-year institutions nearby, tuition differentials make adapting KEYS to fit these schools virtually cost-prohibitive for students. However, DPW is working to establish some alternatives to the traditional KEYS model that might work in currently underserved communities. These alternatives will be the product of collaborations between the closest community colleges, the underserved regions' workforce development teams, and local providers of educational services.

For More Information

Visit

KEYS video (short version– 6 minutes) <http://www.youtube.com/mc3media#p/a/u/0/fKoJPHNSN2Q>

KEYS video (full length – 55 minutes)
<http://palawhelpmultimedia.blogspot.com/2008/06/keys-program-changing-lives-of-families.html>

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