

Department of Social & Health Services

P.O. Box 45010
14th and Jefferson
Olympia, WA 98504-5010

State of Washington Interim Work Verification Plan

September 29, 2006

Table of Contents

I. Countable Work Activities 3

A. Unsubsidized Employment 3

B. Subsidized Employment 5

C. Work Experience 6

D. On-the-job Training 8

E.1. Job Search & Job Readiness (Employment) Assistance 9

E.2. Job Readiness (Rehabilitation) Assistance 11

F. Community Service Programs 14

G. Vocational Education 15

H. Job Skills Training 17

I. Education Directly Related to Employment..... 19

J. Secondary School/Certificate of General Equivalence 20

K. Community Service Child Care (Not Currently Used) 21

II. Hours Engaged in Work..... 23

A. Excused Absences 23

B. FLSA Deeming..... 24

III. Work-Eligible Individual 26

IV. Internal Controls..... 29

A. Pertinent Findings..... 29

B. Internal Controls 29

V. Verification of Other Data 32

A. Complete & Accurate Data 32

B. Work Participation Status 33

Appendixes 35

Appendix A: Qualified Medical or Mental Health Professionals 35

I. Countable Work Activities

Services, Countable Hours, Verification & Daily Supervision

For the purposes of reporting work participation to Health and Human Services, the State will begin using the following work activities, with their related daily supervision and satisfactory progress provisions, effective October 1, 2006. The State will use the methodologies described in this section to ensure that job search/job readiness assistance and vocational education durational limits are correctly applied. Some of the procedures, methodology and automation used to document, verify and report actual countable hours of participation will be phased in over the next 12 months. All aspects of this section of Washington State's Work Verification Plan will be in place by October 1, 2007.

A. Unsubsidized Employment

Federal Definition of Unsubsidized Employment

Unsubsidized employment means full- or part-time employment in the public or private sector that is not subsidized by TANF or any other public program.

Questions

1. **Describe the services or programs the State includes under unsubsidized employment.**

Full- or part-time employment includes employment in the public or private sector that is not subsidized by TANF or any other public program.

2. **Describe how the State determines the number of countable hours of participation for unsubsidized employment. If the State uses different methods for different services or programs within the activity, describe each.**

The State reports projected hours of unsubsidized or subsidized employment or OJT for up to six months at a time on the basis of prior, documented actual hours of work. This estimate will also take into account the actual hours that can be reasonably expected based on verification of the participant's current, past and expected circumstances. Staff determines if this estimate is reasonable by looking at paystubs, other documents, statements and other verification.

At the end of the six-month period, the State will apply the reporting rules described in the Washington Administrative Code 388-418 to determine whether it must obtain new valid documentation of any changes or re-verify the participant's current, actual average hours before it reports these hours for another six-month period. If, at any time, the State knows of a change in the participant's work situation, the State will apply its reporting rules to determine whether the new actual hours must be re-verified, documented and prospectively reported for a new period not to exceed six months.

3. Describe how the State verifies the actual hours of participation for unsubsidized employment. Include the procedures for obtaining and maintaining documentation of hours of participation.

The State will accept the following types of verification to substantiate hours of employment and maintain documentation in the form of electronically imaged documents or written documentation in our electronic eligibility or participation tracking systems:

- Pay stubs
- Employer statement by telephone or in writing
- Information from other government sources, such as the federal National Directory of New Hires (with additional verification, as required, to confirm hours of employment)
- Bank statement that shows direct deposits (with additional verification, as required, to confirm gross income and hourly rate of pay)
- Collateral contact

Any source, including verbal, written, and email statements, can be used as long as it meets the State's criteria for evaluating verification, outlined in WAC 388-490-0005.

4. For self-employment, describe how the State counts and verifies the hours of participation. A State may not count more hours toward the participation rate for a self-employed individual than the individual's self-employment income (gross income less business expenses) divided by the Federal minimum wage. The State may also describe an alternative methodology to count and verify hours a client is engaged in self-employment.

The State will count the individual's verified self-employment income (gross income less verified business expenses) divided by the Federal minimum wage. The State may also accept second-party statements or documents that confirm the time spent at a self-employment enterprise, such as customers who receive services (such as childcare) for a set number of hours or other businesses that can attest to the recipient's normally scheduled business hours.

5. If the State intends to project forward hours of participation based on current, documented, actual hours, explain how it will make this projection.

The State uses two methods to estimate projected actual hours of employment:

- Anticipated Monthly Hours: The State estimates the actual number of employment hours the participant is expected to work in the month. This method is always used for the first month of TANF. After the initial TANF month, the State may average hours of employment for the remaining months of the six-month period.
- Averaging Hours: The State estimates weekly employment hours based on adding the total expected hours of employment for a period of time, dividing by

the number of months in the time period and dividing by 4.33 weeks. If the participant receives yearly income over less than a year, the State will average this income over the year unless the participant is paid on an hourly or piecework basis or a migrant/seasonal farm worker under WAC 388-406-0021.

B. Subsidized Employment

Federal Definitions of Subsidized Employment

Subsidized private sector employment means 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 means employment in the public 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.

Questions

1. Describe the services or programs the State includes under subsidized employment.

Washington State has two programs that provide TANF-funded subsidized employment. The subsidy offsets all of the participant's wages. The participant is paid the state minimum wage, and receives similar benefits (such as sick leave and annual leave) as an employee with no subsidy who performs similar work, the Washington State Department of Community, Trade and Economic Development acts as the employer of record and contracts with a third-party who is paid a fee to cover job development, oversight of the participant's progress and success in placing participants in unsubsidized employment.

- The Community Jobs Program provides TANF-funded subsidized employment at a public, government, non-profit or tribal agency.
- The Career Jump Program provides private sector subsidized employment with an agreement to hire, at above minimum wage with wage progression and benefits comparable to other employees, from the employer.

The State may include paid job readiness activities as part of a participant's subsidized job, and, if so, pay any costs related to providing these activities. Community Jobs and Career Jump participants may also be required to participate in other activities in addition to her or his subsidized employment. Countable hours of additional work activities will be verified and recorded in the State's electronic participation tracking system (eJAS) under the appropriate work activity.

Subsidized employment also includes college work study, which is paid employment for an educational institution.

2. Describe how the State determines the number of countable hours of participation for subsidized employment. If the State uses different methods for different services or programs within the activity, describe each.

See unsubsidized employment (I.A.2.) for description.

3. Describe how the State verifies the actual hours of participation for subsidized employment. Include the procedures for obtaining and maintaining documentation of hours of participation.

For community jobs and career jump, the worksite supervisor provides daily supervision for the hours of subsidized employment. Supervisors maintain timesheets on a daily basis and share this information with the 3rd-party contractor. Timesheets are signed by both the supervisor and the TANF participant. Pay stubs provide additional documentation of the participant's hours of subsidized employment.

For activities other than work, contractors will report them separately under the appropriate federal category and maintain daily attendance records for all workshops and independent activities conducted by the Community Jobs Contractor. For activities outside of the Community Jobs Contractor agency, attendance documentation will be a requirement for participation. The provider must be committed to providing daily supervision and attendance records in order for the activity to be considered part of the Community Jobs Program.

Attendance records will be documented in Washington State's electronic tracking system within the Individual Development Plan (electronic documentation of the participants employment and personal development goals) in narrative form for each co-enrollment activity. It is a current requirement that Individual Development Plans be updated on a monthly basis.

College work study is verified in the same manner as unsubsidized employment.

4. If the State intends to project forward hours of participation based on current, documented, actual hours, explain how it will make this projection.

See unsubsidized employment (I.A.5.) for description.

5. Describe the methods of daily supervision.

The worksite supervisor provides daily supervision for the hours of subsidized employment and the third-party contractor provides additional monthly supervision to ensure the participant is doing well at the worksite and making progress towards meeting her or his employment goals. College work study is supervised in the same manner as an unsubsidized job.

C. Work Experience

Federal Definition of Work Experience

Work experience (including work associated with the refurbishing of publicly assisted housing) if sufficient private sector employment is not available means 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.

Questions

1. Describe the services or programs the State includes under work experience.

The State will administer short-term and long-term work experience opportunities. The services will include but are not limited to:

- Development of the work site, making good matches of work site with parents
- Case management to ensure parents are progressing and gaining from the experience
- Development, with the work site and parent, of training plans that outline the specific skills the parent will be focusing on, and including classroom or other training that might best benefit the parent
- Support services that assist the parent to participate
- Portions of substance abuse treatment, mental health treatment, or rehabilitation services that meet a commonsense definition of unpaid work.
- Development of a signed agreement between parent, work site and program ensuring daily supervision, expectations and desired outcomes.

2. Describe how the State determines the number of countable hours of participation for work experience. If the State uses different methods for different services or programs within the activity, describe each.

The number of countable hours of participation for work experience is determined using the FSLA deeming provisions in Section II.B.. The State will document actual hours spent in scheduled activities to determine whether individuals have participated for the maximum number of countable hours that can be required, based on the definitions of countable activities described in the interim TANF regulations, and the activities described in the list above. Activities that fall within these definitions constitute countable activities.

3. Describe how the State verifies the actual hours of participation for work experience. Include the procedures for obtaining and maintaining documentation of hours of participation.

The work/training site supervisor or designee will document, track and certify daily participation in a State-approved format, such as a timesheet or form given to the employer. State or contracted staff will maintain regular contact with the work/training site and verify that the parent is participating as required. The documentation is maintained for at least 30 months as history.

4. Describe the methods of daily supervision.

The work experience work/training site must provide daily supervision for the parent and ensure the parent is participating as required, as well as meeting the

training expectations agreed to. State or contracted staff maintain regular contact with the work/training site, to monitor progress and to verify participation.

D. On-the-job Training

Federal Definition of On-the-job Training

On-the-job training (OJT) means 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 of the job. On-the-job training must be supervised by an employer, work site sponsor, or other responsible party on an ongoing basis no less frequently than daily.

Questions

1. Describe the services or programs the State includes under on-the-job training.

On the job training provides an employee with on-site or off-site training specified by the employer to train the person for their position...The State will provide or contract for the provision of job development for the placement of TANF parents into on-the-job training jobs with private or public sector employers. Contractual agreements will be entered into with employers, parents and State regarding the length of training time, what skills the parent will obtain through the employer training, and the amount of the subsidy for the training. In addition, the agreements will include provisions for appropriate classroom or other relevant training as needed. Agreements are stored electronically for 30 months.

Support services may also be provided depending on the parents' need and the job requirements.

2. Describe how the State determines the number of countable hours of participation for on-the-job training. If the State uses different methods for different services or programs within the activity, describe each.

See unsubsidized employment (I.A.2.) for description.

3. Describe how the State verifies the actual hours of participation for on-the-job training. Include the procedures for obtaining and maintaining documentation of hours of participation.

The hours of participation will be verified by obtaining work timesheets from the employer showing the actual hours the parent worked/trained while on the job. Timesheets are signed by employer and parent and stored for 30 months.

4. Describe the methods of daily supervision.

The employers will be required to provide daily supervision for the parent, and to keep daily work records on a timesheet, and to submit the timesheet on a regular basis. State staff will visit OJT sites on a regular basis to ensure the conditions of the contractual agreements are being adhered to, and to obtain the participation documentation.

5. Describe the nature of training provided by employers that distinguishes this from subsidized employment.

OJTs will contain elements of off- or on-site training provided by the employer that relates specifically to performance of the job. The training is designed to train an individual to be able to do the job they were permanently hired to do.

6. If the State intends to project forward hours of participation based on current, documented actual hours, explain how it will make this projection.

See unsubsidized employment (I.A.5.) for description.

E.1. Job Search & Job Readiness (Employment) Assistance

Federal Definition of Job Search & Job Readiness (Employment) Assistance

Job search and job readiness assistance means the act of seeking or obtaining employment, preparation to seek or obtain employment, including life skills training, and substance abuse treatment, mental health treatment, or rehabilitation activities for those who are otherwise employable. 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.

Questions

1. Describe the services or programs the State includes under job search and job readiness (employment) assistance.

The job search and job readiness (employment) services include, but are not limited to:

- Work Skill Assessment of work values, interests and work skills
- Workshops to build skills in job search competencies
 - Job interviewing
 - Applications
 - Exploring the labor market
 - Resume writing
 - Other relevant topics
- Job matching and job referrals
- Contacting employers to seek employment
- Life skills training

Washington State Interim Work Verification Plan
September 29, 2006

- Time spent accomplishing tasks that are needed to accept employment such as arranging childcare or transportation or obtaining clothes suitable for employment.
- Hiring events, bringing employers who are hiring together with parents who are looking for work
- Job development, business outreach activities

2. Describe how the State determines the number of countable hours of participation for job search/job readiness (employment) assistance. If the State uses different methods for different services or programs within the activity, describe each.

The number of countable hours of participation for job search/job readiness (employment) assistance is determined based on the definitions of countable activities described in the interim TANF regulations, and the activities described in the list above. Activities that fall within these definitions constitute countable activities. Employment counselors will compare daily activity plans with the activities actually performed to determine the countable hours of participation.

3. Describe how the State verifies the actual hours of participation for job search/job readiness (employment) assistance. Include the procedures for obtaining and maintaining documentation of hours of participation.

- a. For job search/job readiness (employment) assistance parents served by the Employment Security Department, the employment services counselor completes an individualized daily activities plan listing required activities built from the list of activities and services shown above. The employment services counselor uses the list of planned activities to verify with the parent which activities were actually performed and document hours accordingly. The employment counselor will supervise activities daily.

For limited English proficient (LEP) parents who receive employment services from providers who do not have access to an automated daily activity plan, the plan is completed on paper and stored at the employment provider's worksite for 30 months. The actual hour information will be transmitted to State staff via the eJAS participation tracking system on a monthly basis.

4. Describe the methods of daily supervision.

For job search/job readiness (employment) assistance parents served by the Employment Security Department, the Customer Automated Tracking System (CATS) is used to track daily attendance. Listed below are the some of the features of CATS:

- Parents or staff sign parents into the system each day. CATS records attendance showing the date and time of each entry
- Records absences, excused and unexcused
- Stores attendance history for 30 months

Staff will supervise activities daily.

For limited English proficient (LEP) parents who receive employment services from providers who do not have access to CATS:

- The LEP parent signs in with the employment provider each day
- The employment provider records absences, excused and unexcused
- The employment provider reports this information regularly to DSHS via the eJAS participation tracking system on a monthly basis
- The provider retains the documentation at their worksite for 30 months.

5. Describe how the State ensures that no more than six total weeks (four consecutive weeks) of job search and job readiness assistance are reported in a fiscal year (or a total of 12 weeks in States that meet the definition of a “needy State” for the Contingency Fund).

This is accomplished by computer code and logic in the programs that accumulate records of job search/job readiness activities. The code resets the continuous weeks counter to 0 at the beginning of each fiscal year. The code discards any records of participation in these categories for the 5th consecutive week (if there is one). It also discards any records of participation in the 7th or greater week in a fiscal year (or in the 13th or greater week during periods of time in which the State meets the definition of a “needy State” for the Contingency Fund).

E.2. Job Readiness (Rehabilitation) Assistance

Federal Definition of Job Search & Job Readiness (Rehabilitation) Assistance

Job search and job readiness assistance means the act of seeking or obtaining employment, preparation to seek or obtain employment, including life skills training, and substance abuse treatment, mental health treatment, or rehabilitation activities for those who are otherwise employable. 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.

Questions

1. Describe the services or programs the State includes under job search and job readiness (rehabilitation) assistance.

If a portion of the treatment or rehabilitation activities meets a common-sense definition of another work activity, then the hours associated with the work may count under the appropriate allowable work category.

Substance abuse treatment may include:

- Detoxification services with medical care and physician supervision
- Intensive inpatient/residential treatment which is a concentrated, short-term program of individual and group counseling by a chemical dependency provider, education and activities for detoxified alcoholics/addicts and their families.

Washington State Interim Work Verification Plan
September 29, 2006

- Recovery house/residential treatment which provides a program of care and treatment, up to 60 days, with social, vocational and recreational activities to aid in patient adjustment to abstinence and to aid in job training, employment, or other types of community activities and treatment (individual and group counseling by a chemical dependency provider).
- Long-term inpatient/residential treatment which provides up to 180 days of care and treatment to chronically impaired alcoholics/addicts with impaired self-maintenance capabilities. Treatment includes education, individual and group counseling by a chemical dependency provider and the development of social and coping skills and assistance with re-entry living skills.
- Outpatient treatment which includes programs of care including individual and group treatment services of varying duration and intensity according to a prescribed plan and education regarding relapse prevention, HIV/AIDS, hepatitis B&C and sexually transmitted diseases. May also include opiate substitution treatment (e.g., Methadone).

Admission to modality of care is determined based on the American Society for Addiction Medicine (ASAM) patient placement criteria.

- *Family violence treatment* may include treatment related to the physical and emotional effects of past/current family violence that hinders job performance or job search including activities needed to address threats to the safety of the individual, the individual's children or the individual's family members or to meet the demands of court intervention, criminal prosecution, safety planning, physical and mental recovery, counseling or moving to escape an unsafe living arrangement. Specific activities may include undergoing assessments, participating in support groups, making arrangements to find safe housing or enter a shelter for battered individuals, seeking needed medical services, obtaining legal assistance and advocacy, and obtaining mental health services or counseling. Some of these services may be delivered by an on-site or local family/domestic violence agency.
- *Other mental health or rehabilitative services* may include medical or mental health treatment, therapy, counseling, support groups, making arrangements to obtain safe housing or enter sheltered housing, physical therapy, services and supports to address learning disabilities and physical, mental or emotional disorders that can interfere with an individual's ability to work or look for work. These services may be provided by the Division of Vocational Rehabilitation or by qualified medical/mental health professionals. Activities may include accessing services to eliminate, circumvent, or mitigate an impediment(s) to employment, undergoing needed medical treatment, worker retraining programs, or mental health services, obtaining support services, like transportation, adaptive devices, child care, and services to family members and undergoing assessment, diagnostic and evaluation services to develop employability plans.

- 2. Describe how the State determines the number of countable hours of participation for job search/job readiness (rehabilitation) assistance. If the State uses different methods for different services or programs within the activity, describe each.**

The number of countable hours of participation for job search/job readiness (rehabilitation) assistance is determined based on the definitions of countable activities described in conformance with the interim TANF regulations, as described in the list above. Activities that fall within these definitions constitute countable activities. Department of Social and Health Services staff will determine the number of hours and types of activities completed via documentation provided by a qualified medical or mental health professional or designee, as defined in Appendix A.

3. Describe how the State verifies the actual hours of participation for job search/job readiness (rehabilitation) assistance. Include the procedures for obtaining and maintaining documentation of hours of participation.

The qualified medical or mental health professional or designee, as defined in Appendix A, will certify that he or she is aware of what the TANF recipient is supposed to be doing on a daily basis and that the participant is doing these activities.

4. Describe the methods of daily supervision.

The qualified medical or mental health professional or designee, as defined in Appendix A, may provide services directly or refer the participant for services and monitor compliance. The State will not report activities unless the provider certifies that participant received daily supervision.

5. If the State intends to count as substance abuse treatment, mental health treatment and rehabilitation activities, describe the criteria to determine whether recipients are "otherwise employable" and establish the necessity of treatment or therapy. Describe the certification requirements for qualified medical or mental health professionals used in this process.

- Individuals are determined "otherwise employable" and required to participate in job readiness assistance activities when they are unable to find full-time employment and/or have health or family issues that interfere with the individual's ability to work. For these individuals, the State creates an Individual Responsibility Plan with action steps that will resolve the issue so the individual can make progress towards independence.
- A qualified medical or mental health professional, as defined on Appendix A, will certify in writing that the treatment, therapy and related activities are necessary. This professional may designate another individual as qualified and responsible to provide direct services to the individual and to provide daily supervision.

6. Describe how the State ensures that no more than six total weeks (four consecutive weeks) of job search and job readiness assistance are reported in a fiscal year (or a total of 12 weeks in States that meet the definition of a "needy State" for the Contingency Fund).

See job search/job readiness (employment) assistance (I.E.1.5.) for description.

F. Community Service Programs

Federal Definition of Community Service

Community service programs means structured programs and embedded activities in 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 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.

Questions

1. Describe the services or programs the State includes under community service.

The State is in the process of developing a Community Service program in which TANF recipients perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. The program will be designed to improve the employability (that is, work skills and improve work habits) of recipients not otherwise able to obtain employment or full-time employment. The State's Community Service program may include short-term training or similar activities that are needed to perform the volunteer work.

2. Describe how the State determines the number of countable hours of participation for community service. If the State uses different methods for different services or programs within the activity, describe each.

The number of countable hours of participation will be determined using the FSLA deeming provisions in Section II.B. unless FSLA requirements do not apply to a particular volunteer activity. The State will document actual hours spent in scheduled activities to determine whether individuals have participated for the maximum number of countable hours that can be required, based on the definitions of countable activities described in the interim TANF regulations, and the activities described above. Activities that fall within these definitions constitute countable activities.

3. Describe how the State verifies the actual hours of participation for community service. Include the procedures for obtaining and maintaining documentation of hours of participation.

The volunteer work/training site supervisor or designee will document, track and certify daily participation in a State-approved format, such as a timesheet or form given to the volunteer organization. State or contracted staff will maintain regular contact with the volunteer work/training site and verify that the parent is

participating as required. The documentation will be maintained for at least 30 months as history.

4. Describe the methods of daily supervision.

The volunteer work/training site must provide daily supervision for the recipient and ensure the recipient is participating as required, as well as meeting the agreed-upon work skills and training expectations. State or contracted staff will maintain regular contact with the volunteer work/training site, to monitor progress and to verify participation.

5. Describe how the types of community service positions that create an employer/employee relationship and are subject to the FLSA minimum wage requirements will be determined.

The State is developing a methodology to determine which Community Service positions are subject to FLSA minimum wage requirements, including consultation with the volunteer organizations. Full-time community service positions will create an employer/employee relationship.

6. If the State permits self-initiated community service positions, describe how it determines that the position provides a direct community service and improves the recipient's employability.

The State is researching options that would permit self-initiated community service position with established public or non-profit organizations that provide a direct community service, such as food banks or volunteer organizations. These volunteer opportunities would improve a recipient's employability by providing a chance to perform work, to learn new work skills or habits and to increase self-esteem by contributing to the community.

G. Vocational Education

Federal Definition of Vocational Education

Vocational education (not to exceed 12 months with respect to any individual) means 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 educational training must be supervised on an ongoing basis no less frequently than daily.

Questions

1. Describe the services or programs the State includes under vocational education.

Vocational education is training that leads to a certificate in a specific occupation or a degree, not to result in a baccalaureate or advanced degree and may include:

Washington State Interim Work Verification Plan
September 29, 2006

- Basic education, such as classes to prepare for general equivalency diploma (GED), testing to acquire GED certification, adult basic education (ABE) or English as a second language (ESL) training when deemed a necessary and required part of the program and are of limited duration including ESL that is needed to become employable or to become ready to participate in other work activities provided in classes that are geared to workplace language proficiency;
- Remedial/developmental education and prerequisites deemed a necessary and required part of the program that are of a limited duration; and
- Supervised homework and study activities.

Vocational education may be offered by accredited organizations that meet the WorkFirst program's standards for service providers:

- (a) Public and private technical colleges or schools;
- (b) Community colleges; or
- (c) Tribal colleges.

2. Describe how the State determines the number of countable hours of participation for vocational education. If the State uses different methods for different services or programs within the activity, describe each.

The number of countable hours of participation is determined based on the definitions of countable activities described in the interim TANF regulations, and the activities described above. Activities that fall within these definitions constitute countable activities. College/educational provider program staff will use the number of hours spent in the classroom and doing supervised homework and study hall activities to determine the countable hours of participation.

3. Describe how the State verifies the actual hours of participation for vocational education. Include the procedures for obtaining and maintaining documentation of hours of participation.

The method of verification of actual hours will be dependent upon the activity and the student composition of the class. For instructional activities comprised entirely of TANF students, class attendance sheets will be used to verify attendance. For activities which include non-TANF students, individual timesheets will be signed by the faculty member, supervisor, or other appropriate individual as well as the student or documented in electronic tracking systems, as appropriate. Attendance records will be documented every two weeks and maintained in the college's students' files.

4. Describe the methods of daily supervision.

Faculty, instructors, instructional aides, lab supervisors, study hall supervisors, and supervisors of work-based learning activities provide daily supervision for the hours of vocational education. College program designees also provide additional monthly supervision to ensure the participant is doing well in his or her program and making progress towards meeting her or his educational and employment goals.

5. Describe how the State ensures participation in vocational educational training does not count beyond the statutory limitations limiting participation to 12 months lifetime per individual.

The State counts hours in work activity components that correspond to the federal definition of vocational education training. Hours are counted for participants who are receiving TANF assistance at the time they were active in this component, and to only count hours in the first 12 months that met the above conditions in or after August, 1997.

This is accomplished by logic and computer code in automated programs that accumulate records of vocational education training activities.

6. Explain how the State will ensure that basic and remedial education and English as a Second Language (ESL), if such activities are counted, are of limited duration and a necessary or regular part of the vocational education training.

Each vocational education program has clearly documented entry requirements designed to ensure student success. These requirements are a necessary and regular part of the vocational training. Educational Advisors will refer to these requirements before enrolling students in vocational education to ensure that the preparatory activities are of limited duration.

In addition, the State may place recipients in programs which integrate basic skills with vocational education. Termed *Integrated Basic Education and Skills Training (I-BEST)*, these programs integrate basic education throughout the entire program.

H. Job Skills Training

Federal Definition of Job Skills Training

Job skills training directly related to employment means 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 no less frequently than daily.

Questions

1. Describe the services or programs the State includes under job skills training.

Job skills training is 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 to include vocational education and courses explicitly required for program entry.

Activities include but are not limited to:

- Customized training programs to meet the needs of a specific employer;
- General training that prepares an individual for employment to include vocational education and courses explicitly required for program entry;

Washington State Interim Work Verification Plan
September 29, 2006

- Pre-employment training designed to provide the skills students need for an identified entry level job that pays more than average entry level wages;
- Basic education, including classes to prepare for general equivalency diploma (GED), testing to acquire GED certification, adult basic education (ABE) or English as a second language (ESL) training when such instruction is explicitly focused on skills needed for employment or combined in a unified whole with job training, and;
- Supervised homework and study activities.

The training may be offered by the following types of organizations that meet the WorkFirst program's standards for service providers:

- Community based organizations;
- Businesses;
- Tribal governments or colleges;
- Private career schools and colleges; or
- Public community and technical colleges.

2. Describe how the State determines the number of countable hours of participation for job skills training. If the State uses different methods for different services or programs within the activity, describe each.

The number of countable hours of participation is determined based on the definitions of countable activities described in the interim TANF regulations, and the activities described above. Activities that fall within these definitions constitute countable activities. College/educational provider program staff will use the number of hours spent in the classroom and doing supervised homework and study activities to determine the countable hours of participation.

3. Describe how the State verifies the actual hours of participation for job skills training. Include the procedures for obtaining and maintaining documentation of hours of participation.

The method of verification of actual hours will be dependent upon the activity and the student composition of the class. For instructional activities comprised entirely of TANF students, class attendance sheets will be used to verify attendance. For activities which include non-TANF students, individual timesheets will be signed by the faculty member, supervisor, or other appropriate individual as well as the student or documented in electronic tracking systems, as appropriate. Attendance records will be documented every two weeks and maintained in the college's or provider's students' files.

4. Describe the methods of daily supervision.

Faculty, instructors, instructional aides, lab supervisors, study supervisors, and supervisors of work-based learning activities provide daily supervision for the hours of education. College program designees also provide additional monthly

supervision to ensure the participant is doing well in his or her program and making progress towards meeting her or his educational and employment goals.

I. Education Directly Related to Employment

Federal Definition of Education Directly Related to Employment

Education directly related to employment, in the case of a recipient who has not received a high school diploma or a certificate of high school equivalency means education related to a specific occupation, job, or job offer. Education directly related to employment must be supervised on an ongoing basis no less frequently than daily.

Questions

1. Describe the services or programs the State includes under education directly related to employment.

Education directly related to employment activities include:

- Classes to prepare for general equivalency diploma (GED);
- Testing to acquire GED certification
- Adult basic education (ABE);
- English as a second language (ESL) training, and;
- Supervised homework and study activities.

Education directly related to employment may be provided to limited-English proficient participants who either cannot produce or do not possess an education that is recognized by United States employers as equivalent to a high school/GED obtained in this country.

2. Describe how the State determines the number of countable hours of participation for education directly related to employment. If the State uses different methods for different services or programs within the activity, describe each.

The number of countable hours of participation is determined based on the definitions of countable activities described in the interim TANF regulations, and the activities described above. Activities that fall within these definitions constitute countable activities. College/educational provider program staff will use the number of hours spent in the classroom and doing supervised homework and study activities to determine the countable hours of participation.

3. Describe how the State verifies the actual hours of participation for education directly related to employment. Include the procedures for obtaining and maintaining documentation of hours of participation.

The method of verification of actual hours will be dependent upon the activity and the student composition of the class. For instructional activities comprised entirely of TANF students, class attendance sheets will be used to verify attendance. For activities which include non-TANF students, individual timesheets will be signed by the faculty member, supervisor, or other appropriate individual as well as the student or documented in electronic tracking systems, as appropriate. Attendance

records will be documented every two weeks and maintained in the college's or provider's students' files.

4. Describe the methods of daily supervision.

Faculty, instructors, instructional aides, lab supervisors, study hall supervisors, and supervisors of work-based learning activities provide daily supervision for the hours of education. College program designees also provide additional monthly supervision to ensure the participant is doing well in his or her program and making progress towards meeting her or his educational and employment goals.

5. Describe the State's criteria for "good or satisfactory progress" and when and how it is documented.

The State's criteria for "good or satisfactory progress" include student performance on assigned tasks, attendance, and ability to complete coursework within the required timeframes under the standards of the institution or program. Student progress will be documented on an ongoing basis by the classroom instructor or designee and reported monthly in the State's automated participation tracking system.

J. Secondary School/Certificate of General Equivalence

Federal Definition of Secondary School/GED

Satisfactory attendance at 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 means 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.

Questions

1. Describe the services or programs the State includes under secondary school/GED.

Secondary school/GED activities include:

- High school completion classes;
- Classes to prepare for general equivalency diploma (GED);
- Testing to acquire GED certification;
- This activity may be provided to participants who either cannot produce or do not possess an education that is recognized by United States employers as equivalent to a high school/GED obtained in this country and include language instruction as needed to complete the course work, and;
- Supervised homework and study activities.

- 2. Describe how the State determines the number of countable hours of participation for secondary school/GED. If the State uses different methods for different services or programs within the activity, describe each.**

The number of countable hours of participation is determined based on the definitions of countable activities described in the interim TANF regulations, and the activities described above. Activities that fall within these definitions constitute countable activities. College/educational provider program staff will use the number of hours spent in the classroom and doing supervised homework and study activities to determine the countable hours of participation.

- 3. Describe how the State verifies the actual hours of participation for secondary school/GED. Include the procedures for obtaining and maintaining documentation of hours of participation.**

The method of verification of actual hours will be dependent upon the activity and the student composition of the class. For instructional activities comprised entirely of TANF students, class attendance sheets will be used to verify attendance. For activities which include non-TANF students, individual timesheets will be signed by the faculty member, supervisor, or other appropriate individual as well as the student or documented in electronic tracking systems, as appropriate. Attendance records will be documented every two weeks and maintained in the college's or provider's students' files.

- 4. Describe the methods of daily supervision.**

Faculty, instructors, instructional aides, lab supervisors, study hall supervisors, and supervisors of work-based learning activities provide daily supervision for the hours of education. College program designees also provide additional monthly supervision to ensure the participant is doing well in his or her program and making progress towards meeting her or his educational and employment goals.

- 5. Describe the State's criteria for "good or satisfactory progress" and when and how it is documented.**

See education directly related to employment (I.1.5.) for description.

K. Community Service Child Care (Not Currently Used)

Federal Definition of Community Service Child Care

Providing child care services to an individual who is participating in a community service program means providing child care to enable another TANF recipient to participate in a community service program. This activity must be supervised on an ongoing basis no less frequently than daily.

Questions

- 1. Describe the services or programs the State includes under community service child care.**

Not used.

- 2. Describe how the State determines the number of countable hours of participation for community service child care. If the State uses different methods for different services or programs within the activity, describe each.**

Not used

- 3. Describe how the State verifies the actual hours of participation for community service child care. Include the procedures for obtaining and maintaining documentation of hours of participation.**

Not used

- 4. Describe the methods of daily supervision.**

Not used

II. Hours Engaged in Work

Excused Absences & Deeming

The State's excused absence policy is currently in effect. The policy related to holidays and the procedures, methodology and automation used to report excused absences and holidays in the State's TANF Data Report will be phased in over the course of the next year. The State anticipates adopting a "mini" Simplified Food Stamp Program on January 1, 2007 and having procedures, methodology and automation for the deeming provision phased in over the next 12 months. All aspects of this section of Washington State's Work Verification Plan will be in place by October 1, 2007.

A. Excused Absences

Questions

1. **Describe the State's excused absence policies for unpaid work activities. This includes its policies for holidays as well as the ten additional excused absences that the State may count in a 12-month period.**

The State will count reasonable short-term, excused absences, as defined below, for hours missed due to holidays and a maximum of 10 additional days of excused absences in any 12-month period, no more than two or which may occur in a month. The State will apply these absences on an hourly basis, with one day being equal to eight hours. The State will count holidays and excused absences that occur between the scheduled start and end date of an allowable work activity that the State reports as participation.

- **Holidays:** The State defines "holidays" as the paid holidays provided for state staff as defined in RCW 1.16.050 and officially scheduled closures of state organizations, such as the community and technical colleges, as recorded on their published academic calendars with the exception of summer closures.

RCW 1.16.050: The following are legal holidays: Sunday; the first day of January, commonly called New Year's Day; the third Monday of January, being celebrated as the anniversary of the birth of Martin Luther King, Jr.; the third Monday of February to be known as Presidents' Day and to be celebrated as the anniversary of the births of Abraham Lincoln and George Washington; the last Monday of May, commonly known as Memorial Day; the fourth day of July, being the anniversary of the Declaration of Independence; the first Monday in September, to be known as Labor Day; the eleventh day of November, to be known as Veterans' Day; the fourth Thursday in November, to be known as Thanksgiving Day; the day immediately following Thanksgiving Day; and the twenty-fifth day of December, commonly called Christmas Day. Whenever any legal holiday, other than Sunday, falls upon a Sunday, the following Monday shall be the legal holiday. Whenever any legal holiday falls upon a Saturday, the preceding Friday shall be the legal holiday.

- **Excused absences:** The State defines the WorkFirst "excused absence" policy in Washington Administrative Code 388-310-0500(5) and (6). An individual may be

given an excused absence when the individual cannot go to a required WorkFirst appointment or activity due to a temporary situation outside of the individual's control. To get an excused absence, the individual must call the provider to explain the situation on or before the day the individual was to report. If the individual does not call in to get an excused absence, it will be considered an unexcused absence.

2. If the policies vary by work activity, The State should describe how they vary and for which activities.

The policy does not vary by unpaid work activities.

B. FLSA Deeming

Questions

1. If the State wishes to use the "deeming" provision permitted at 261.31 and 261.32 for work experience or community service programs, describe how the State determines the work hours requirement, including how the monthly TANF grant and food stamp allotment are combined and divided by the appropriate minimum wage to meet the "core" participation requirement.

The State will use the following methodology to determine the maximum number of hours per week that the State may require for work experience or community service activities that are subject to the Fair Labor Standards Act (FLSA):

For pure TANF households, the state combines the TANF grant with the food stamp allotment to determine the combined allotment. The combined allotment is then divided by the state minimum wage to determine the maximum monthly hours the State may require for work experience or community service activities that are subject to FLSA. The monthly hours are divided by 4.33 to determine the weekly hours the assistance unit may work to meet the "core" requirement.

The state minimum wage is currently \$7.63 an hour. The Washington State Department of Labor and Industries re-calculates the state minimum wage each September based on the federal "CP-W" index to be effective January 1st of the following year.

- When determining hours for a work-eligible individual in the all-family rate, the State will consider a work-eligible individual who participates the maximum number of hours per week the State may require in a work experience or community service program that is subject to FLSA to have participated 20 hours per week if actual participation falls short of 20 hours per week.
- When determining hours for a family with two work-eligible parents for the two-parent rate, the State will consider a family in which one or both parents participate the maximum number of hours per week the State may require in a work experience or community service program to have participated 30 or 50 hours per week if actual participation falls short of 30 or 50 hours per week.

2. Include a statement certifying that the State has adopted a "mini" Simplified Food Stamp Program in order to count the value of food stamp benefits. The Food and Nutrition Service has indicated that a TANF work

experience or community service program can serve as the Food Stamp Workfare Program, which would otherwise be required before a State could combine the food stamp allotment to calculate the hours required.

The State of Washington certifies that it will adopt a "mini" Simplified Food Stamp Program effective January 1, 2007.

3. If State policies or procedures differ for work experience and community service programs on FLSA deeming the State should make those differences clear.

The State will use the same FLSA deeming policies and procedures for work experience and community service programs that are subject to the FLSA minimum wage requirement.

III. Work-Eligible Individual

Identification, Verification & Procedures

The State will identify work-eligible individuals effective October 1, 2006. Some of the procedures, methodology and automation used to report work-eligible status and to include families in the overall and/or two-parent work participation rates in the State's TANF Data Report, including establishing internal controls to ensure accuracy, will be phased in over the next 12 months. All aspects of this section of Washington State's Work Verification Plan will be in place by October 1, 2007.

Federal Definition of Work-Eligible Individual

Work-eligible individual means an adult (or minor child head-of-household) receiving assistance under TANF or a separate State program or a **non-recipient parent** living with a child receiving such assistance (usually a child-only case) unless the parent is:

- A minor parent and not the head-of-household or spouse of the head-of-household;
- An alien who is ineligible to receive assistance due to his or her immigration status; or
- At State option, on a case-by-case basis, a recipient of Supplemental Security Income (SSI) benefits.

The term also excludes:

- A parent providing care for a disabled family member living in the home who does not attend school on a full-time basis, provided that the need for such care is supported by medical documentation; and
- An individual in a family receiving MOE-funded assistance under an approved Tribal TANF program, unless the State includes the Tribal family in calculating work participation rates.

Questions

1. **Describe the State's procedures for identifying all work-eligible individuals, as defined at 261.2. This should include the procedures needed to identify a non-recipient parent excluded from the definition of work-eligible individual.**

The State will identify work-eligible adults (or minor child head-of-households) in the following order:

- **Category 1:** An adult (or minor child head-of household) receiving assistance
- **Categories 7 through 9:** Non-work eligible adults (caretaker relative caring for a disabled family member in the home, ineligible alien due to immigration status or a non-recipient parent receiving SSI)

- **Categories 5 and 6:** Non-recipient adults will be categorized as work-eligible (a non-recipient parent found ineligible for TANF due to other reasons) or not work-eligible (as the non-recipient head of household is not a parent).

The State will not use categories 2 through 4 as it will not exercise its option to include non-recipient parents receiving SSI and State policy does not remove parents from the assistance unit due to sanction or time limits.

- 2. The State should also describe its procedures for identifying a parent caring for a disabled family member, who may also be excluded from the definition of a work-eligible individual. The procedures should define the terms "disabled," "family member" and "attending school full-time." This should include a means of ensuring that the need for care in the home is supported by medical documentation and describe the nature of the medical documentation used to make such determinations. If the State includes in this group parents caring for a family member with a temporary disability, the State must describe its procedures for determining when the family member is no longer disabled and ensuring that the parent is then identified as a work-eligible individual.**

The State will define a parent as not work-eligible under the following conditions:

- The parent is required to stay home to care for a child (who is not attending school full-time) with a special medical, developmental, mental or behavioral condition who requires specialized care or treatment that significantly interferes with the caretaker relative's ability to look for work or work as determined by a social worker, public health nurse, physician, mental health provider, school professional, other medical professional, Home and Community Services, the Mental Health Division or Regional Support Network.
- The parent is required to be in the home to care for another adult with disabilities (who is not attending school full-time) who cannot be left alone for significant periods of time when no other adult is available and able to provide the care and the adult with the disability is related to the caretaker relative. The disabled adult's disability must be verified by documentation from the Developmental Disability Division, the Division of Vocational Rehabilitation, Home and Community Services, the Mental Health Division, the Regional Support Network or with evidence from another medical or mental health professional as defined in Appendix A of this plan.
- **Attending school full-time:** For persons enrolled in elementary or secondary school (pursuing Kindergarten through a 12th grade education), full-time attendance is defined as proven able to consistently attend class for six and a half hours or more per day for five days per week. For persons enrolled in higher education, full-time attendance is defined as 12 credits or more and consistently able to attend all scheduled hours of class.

For temporary disabilities, the State will document the expected duration of the disability and only approve the parent staying home to care for the disabled family member for that period of time. At the end of that time period, the State will request additional verification if it appears that the family member will require additional home care.

3. Describe verification procedures for ensuring the accuracy in reporting of work-eligible individuals on the TANF Data Report and the SSP-MOE Data Report, including:

- **The correct reporting of the Work Participation Status of all adult (or minor child head-of-household) family members, and**
- **The proper identification of TANF Families for inclusion in only the overall work participation rate or the overall and two-parent work participation rates, or exclusion from both the overall and two-parent work participation rates.**

The State will verify each individual's eligibility status using the State's current procedures for establishing eligibility for TANF cash aid and food assistance benefits. See internal controls (IV.B.1.) for a description of the State's quality assurance process that will be used to confirm the accuracy of this data.

Work Participation Status is derived from data from the ACES system (Washington's eligibility system) using explicit coded logic. This produces the data for the Work Participation data element in the current reporting (Reporting Item 48). This data is not entered directly by caseworkers—only derived from data they enter into the system for other purposes.

Whether a family should be included in the overall or also in the two parent rate is derived from data elsewhere in the reporting file – by referring to data elements for Family Affiliation, Relationship to Head of Household, receipt of disability benefits and number of adults in the household who receive assistance. This is derived from coded logic, not input directly by staff.

4. Describe the procedures that show how the State ensures that, for each work-eligible individual, it accurately inputs data into the automated data processing system, properly tracks the hours and accurately reports countable hours to HHS that do not include participation in an activity that does not meet a Federal definition.

State agency staff and contracted providers are responsible to accurately input actual countable hours of participation that conform with federal definitions into Washington State's electronic tracking system (eJAS) each month. See internal controls (IV.B.1.) for a description of the State's quality assurance process and contract monitoring that will be used to confirm the accuracy of this data.

Countable hours reported for work activities are accumulated by computer code accessing the actual hours data in Washington's automated systems. The code accumulates hours into Federal reporting categories using crosswalks maintained by program policy staff. The crosswalks map the state work participation activity codes to the Federal Reporting data elements.

IV. Internal Controls

Findings, Procedures & System/Programming Errors

The State will have many existing internal controls in place effective October 1, 2006. Additional procedures, methodology and automation used to establish internal controls that ensure accuracy, will be phased in over the next 12 months. All aspects of this section of Washington State's Work Verification Plan will be in place by October 1, 2007.

A. Pertinent Findings

The State will maintain all pertinent findings produced through its internal control processes and these findings will be available for use by ACF and other auditors in their review of the State's work participation verification system.

B. Internal Controls

If the State is phasing in procedures or internal controls, describe the phase-in. All procedures must be in place by September 30, 2007.

Questions

- 1. Describe the internal controls designed to ensure established work verification procedures are properly being employed. Such controls may include supervisory guidance, policy directives, and staff training plans, as well as quality assurance processes, such as monitoring procedures to ensure adherence to procedures by staff, providers and contractors. For example, to ensure the State is identifying all work-eligible individuals, a State may periodically check the disability status of a family member who is temporarily disabled, as the parent caring for the disabled family member should become a work-eligible individual once the family member is no longer disabled.**

The State will use the following types of internal controls to determine whether work verification procedures are properly being employed:

- **Quality Assurance Process:** The State will develop a quality assurance process, using a statistically valid sample to review cases, determine causes and initiate corrective action for staff and/or system errors.

Case reviews or ongoing samples will assure that data in Washington State's automated eligibility and participation tracking systems correspond to reported data. The State will also use a defined protocol for correcting data errors and inconsistencies. The State is developing this process and plans to have it fully operational by October 1, 2007.

Contract monitoring will be used to determine whether providers are meeting contractual supervision and documentation requirements and providing accurate and timely reporting of actual hours of participation each month in Washington State's electronic tracking system (eJAS). Contracts will be structured to allow withholding of payment if the contractor does not meet work verification

requirements as described in the contract. The State is modifying contractual requirements and developing the monitoring process and plans to have them fully operational by October 1, 2007.

- **Data integrity:** The State will build on current system controls to identify system and programming errors and validate reporting data used in the TANF federal report.
- **Policy and Training:** The State will develop training and manual materials to describe the new processes and federal requirements so staff and contracted providers are able to correctly apply work verification requirements. Training will occur as policy and automation changes are rolled out over the next 12 months.

2. Describe the internal controls to control for data errors, including transcription and coding errors, data omissions, computational errors, and compilation errors. For example, a State might automatically review the case record of each work-eligible individual whose reported average weekly hours of participation are unusually high (e.g., 70 or more hours per week) by examining the documentation used to support those hours.

For the online system (eJAS), edits and warning messages prevent the user from entering invalid dates and data types. Required fields must be completed before the data can be committed.

Workers manage their caseloads by using both the real-time and daily Caseload Management Report to track clients' participation and process cases when action is required. There is also a feature in the eJAS system that show when a parent is not participating, not progressing or has multiple unexcused absences.

There are a series of automated checks and balances in place to ensure that captured data is accurately reported. See also internal controls (IV.B.1.) for a description of the State's quality assurance process that will be used to confirm that staff is correctly following procedures and providing accurate data.

3. Describe the checks used to isolate electronic systems and programming errors and the steps to ensure that all work participation report items are internally consistent. For example, a State might obtain the raw data (prior to input into an automated data processing system) for a sample of work-eligible individuals and determine manually the average weekly hours of participation for each work activity for a month and compare that result to what the State actually reported to HHS.

All report data is processed from specifically listed fields in the ACES Data Warehouse:

- Many data elements are subject to valid values defined within the system.
- To maintain checks and balances, work activities are mapped to Federal Reporting Elements per explicit direction to information technology staff (who are neither program representatives, nor the organization that submits the reporting files).
- Explicit "Automated Work Requests" (AWR) are needed before IT staff revise the computer code. These are signed off by both the Economic Services Administration and RDA before work starts.

Washington State Interim Work Verification Plan
September 29, 2006

- Employment and work activity hours are entered into the automated systems of record directly by field or contract staff. This data is extracted to the ACES Data Warehouse monthly per an existing approved and tested AWR.
- Work participation report data is not changed at RDA.
- Computer code changes are tested by RDA before being accepted to the production processing that creates monthly data files.
 - AWR acceptance tests include accuracy of the data accessed, accuracy of the data transformations and correspondence to stated requirements.

4. Describe any sampling and estimation techniques employed in data validation. The Work Verification Plan should document the soundness of all statistical procedures utilized in the verification process. All estimation techniques must be reasonable and fully described in the plan. For estimates based on sampling or other statistical techniques, the plan must contain, as appropriate, the step-by-step computations of precision, affirming that the produced estimates are within statistically acceptable levels of reliability and validity.

For the purposes of drawing samples to review cases for accuracy, the sample size will be large enough to provide a precision of plus or minus five percentage points at a 90 percent confidence level. We propose to draw a systematic random sample of cases per month drawn from a universe of cases with an active TANF recipient gathered from ACES to verify the accuracy and consistency of work participation and verification information used to calculate Washington's participation rates.

V. Verification of Other Data

Data Accuracy & Work Participation Status

The State has many existing internal controls that ensure data accuracy in place, including methods to ensure that work participation status rules are correctly applied. Additional procedures, methodology and automation used to establish internal controls that ensure accuracy, will be phased in over the next 12 months. All aspects of this section of Washington State's Work Verification Plan will be in place by October 1, 2007.

A. Complete & Accurate Data

Under the “complete and accurate” standard for data reporting, the State should validate all data submitted in its TANF Data Report and, if applicable, the SSP-MOE Data Report. In addition to the work activities, the following data elements are used in calculating the work participation rates.

- Reporting Month— The reporting month is coded from the benefit month represented by the report file. This has an extremely low possibility of error.
- Stratum— Since Washington reports the universe, not a sample, there is only one stratum—a hard coded value (we use '20'). This has an extremely low possibility of error.
- Case Number—Case Number (Assistance Unit ID) is a key to organization of Washington State's eligibility system. This has an extremely low possibility of error.
- Disposition. Washington draws the population data representing the cases active in the reporting month for the reporting month. This is the full caseload. There is no “listing in error” in that system and this reporting element is always coded as “1” (included in the report).
- Type of Family for Work Participation
- Amount of Food Stamps Assistance
- Receives Subsidized Child Care
- Amounts of TANF (and SSP-MOE) Assistance
- Family Affiliation Code
- Non-custodial Parent Indicator
- Date of Birth (Adult)
- Relationship to Head-of-Household
- Parent with Minor Child
- Work-Eligible Individual Indicator
- Date of Birth (Child)

Washington creates a preview tabulating the frequency distribution of each of the above reporting elements each month. These are examined by the reporting unit (RDA) and distributed to program area staff and executives for review. In addition, all feedback of questionable values, missing data and consistency checks distributed by ACF are reviewed systematically.

The Work Verification Plan should contain the procedures needed to establish that the State has the capacity to breakout TANF families with a work-eligible individual by the case characteristics that relate to the special rules and conditions of participation, such as receipt of child care, age of child, age of adult or teen parent, number of months under a sanction, adult or teen parent with satisfactory school attendance and families with a disabled family member (adult or child).

Washington maintains reference copies of all files transmitted and snapshots of the data that were used to develop these files. The State has established procedures, in the form of written logic, using SAS and other computer languages as needed, to perform ad hoc analyses, report case and participant characteristics and model effects of possible program modifications. This includes capacity to breakout TANF families with (or without) a work-eligible individual by the case characteristics that relate to the special rules and conditions of participation, such as receipt of child care, age of child, age of adult or teen parent, number of months under a sanction, adult or teen parent with satisfactory school attendance and families with a disabled family member (adult or child). This capacity allows us to examine any reported case characteristics for any subset of cases or individuals that can be identified by reference to any set (of one or more) of the data elements in the report files.

Questions

1. **For each of the above data elements, describe the State's validation procedures to ensure "complete and accurate" data reporting.**

See below. In addition, Washington follows the procedures described above in internal controls (IV.B.2.and 3.).

2. **Describe any procedures employed to eliminate data inconsistencies between two or more data elements.**

The State will use procedures described above in internal controls (IV.B.1.) to prevent incorrect data entry and discover and correct errors.

B. Work Participation Status

Questions

1. **Describe the States procedures to ensure that a family is not disregarded from the work participation rate for more than 12 months per lifetime based on being a single custodial parent with a child less than one year of age.**

This is an automated process executed using specific computer logic designed for this purpose. This is not directly under the control of eligibility or social

services staff. It uses data (for example household composition data) stored in the eligibility system itself.

- 2. Describe the State's procedures to ensure that a family is not disregarded from the work participation rate for more than three months in any period of 12 consecutive months based on a work-eligible individual's refusal to participate in work.**

This is an automated process executed using specific computer logic designed for this purpose. This is not directly under the control of eligibility or social services staff. It uses data (for example data indicating reasons for grant reductions) stored in the eligibility system itself.

- 3. Describe the States procedures for ensuring a family deemed engaged in work based on 20 hours of participation in countable work activities meets the requirements of a single custodial parent or caretaker relative with a child under age six**

This is an automated process executed using specific computer logic designed for this purpose. This is not directly under the control of eligibility or social services staff. It uses data (including, for example, data on age of household members and relationship to head of household) stored in the eligibility system itself.

Appendixes

Appendix A: Qualified Medical or Mental Health Professionals

The following qualified medical or mental health professionals will establish the necessity of treatment or therapy and certify to daily supervision for job readiness (rehabilitation) assistance.

Government Staff

Documentation as to the necessity of treatment or therapy may be provided by staff from the:

- Division of Developmental Disabilities
- Division of Vocational Rehabilitation
- Home and Community Services Division
- Mental Health Division or Regional Support Network
- Community Services Division Social Workers

Medical Practitioners

The following types of medical practitioners may document the necessity of treatment or therapy and provide daily supervision of job readiness (rehabilitation) assistance:

- Public health nurse
- Physician or health professional licensed in Washington State
- Certified mental health provider
- Certified mental retardation professional
- School professional
- Chemical dependency professional
- Family/domestic violence agency staff who meet the minimum training requirements as described in WAC 388-61A-0150
- Advanced registered nurse practitioner for physical impairments within her or his area of certification to treat
- Chief of Medical Administration of the Veteran's Administration or their designee, as authorized in federal law
- Physician assistance if cosigned by the supervising physician

Other health professional that has run tests or provides ongoing treatment to the participant.