

Florida's Work Verification Plan

Background:

The Temporary Assistance for Needy Families (TANF) Program in Florida is administered through four state agencies, a state-level policy board, Workforce Florida, Inc. (WFI), and a network of Regional Workforce Boards (RWBs). The agencies are: 1) Department of Children and Families (DCF), 2) Agency for Workforce Innovation (AWI), 3) Department of Health (DOH) and 4) Department of Military Affairs (DMA).

For purposes of this work verification plan, DCF, WFI and AWI have collaborated to describe the required elements of the plan in the context of each agency's respective role in delivering a statewide program to assist TANF recipients in making the transition from welfare to self-sufficiency.

- ❑ **Eligibility Determination, Cash Assistance Payments and Federal Reporting:** The **DCF** is the recipient of the TANF block grant and is responsible for determining eligibility for TANF cash assistance, issuing cash assistance payments to TANF-eligible families and submitting all fiscal and programmatic reports, including data pertaining to the participation rate calculation. Eligibility specialists record applicant and participant data directly into DCF's automated eligibility system, Florida Online Recipient Integrated Data Access (FLORIDA). These data are maintained on FLORIDA and used in concert with AWI workforce data to generate federal reports.
- ❑ **Planning, Policy and Strategic Direction:** The Workforce Innovation Act of 2000 (Chapter 445 F.S.) consolidated most of Florida's workforce programs (TANF, Workforce Investment Act (WIA), and Wagner-Peyser) under a single point of accountability--**Workforce Florida, Inc.** (WFI). As the State's chief workforce policy organization, the non-profit public/private partnership provides policy direction and oversight to Florida's 24 Regional Workforce Boards (RWBs) and the AWI, the designated State agency for administering workforce programs, funding and personnel. A business-led board of directors appointed by the Governor is the governing body for WFI.
- ❑ **Administration and Accountability:** The **AWI** translates State policy on work activities and support services into action. It contracts for all workforce services to deliver programming at the local level, and is the State agency responsible for ensuring that workforce funds and programs are appropriately administered and monitored for accountability. Program staff in the RWBs enter work activity data directly into the data entry system which houses workforce data, referred to throughout the document as the "workforce data entry system." The workforce data entry system maintains the data and DCF extracts required elements from it for monthly and quarterly reports.

The WVP is an integrated plan developed by all partners in Florida's TANF program. DCF has supplied responses related to eligibility determination and overall data integrity and federal reporting; AWI has provided responses related to work activities, documentation or verification of work hours, supervision methods and the data integrity of the workforce data entry system. Responses related to monitoring and the extraction of work data from AWI's system to DCF's system have been supplied by both agencies.

Plan Terminology: Responses related to activities or functions performed through DCF's program network are indicated by "DCF" or "eligibility." Responses related to activities or functions performed through the workforce network are indicated by: "AWI," "RWB," "provider" or "workforce." Activities that are inclusive of both systems are denoted as "Florida" or "State."

Elements	Process Recommended
Unsubsidized Employment	General: Legislation passed in Florida's recent legislative session has modified the State's definitions of TANF work activities so that they are consistent with the work activity definitions in the TANF Preliminary Regulations.
1. Describe the services or programs the state includes under the activity.	<p>Full or part-time employment in the public or private sector that is not subsidized by TANF or any other publicly funded program, which includes the following:</p> <ul style="list-style-type: none"> • Recipients whose employers claim a tax credit for hiring economically disadvantaged workers; • Labor in exchange for services or other amounts (rent, utilities, etc.); and • Self-employment.
2. Describe how the state determines the number of countable hours of participation for the activity. If the state uses different methods for different services or programs within the activity, the state should describe each.	<p>Florida primarily reports countable hours of unsubsidized employment as verified by RWB provider staff and maintained in the workforce data entry system. On occasion DCF workers enter countable hours previously unknown to the workforce but independently verified from customer information provided to DCF into the FLORIDA system, and those hours are also reported. Therefore, the plan describes two processes for determining the number of hours countable for participation in unsubsidized employment.</p> <p>(a) An RWB provider staff member must obtain documentation for each countable hour of participation prior to entering the hours in the workforce data entry system. The data entry system automatically generates a field to record actual hours completed for every week an activity is open on a case associated with an individual who is receiving TCA and is work-eligible. The participation field remains blank until a number from zero to greater than zero is entered in the system. Staff does not automatically enter scheduled hours but collects verification of participation before manually populating the data entry field.</p> <p>As part of the workforce process for verifying countable hours, providers may also conduct vigorous data mining to locate confirmation/documentation of employment as maintained in recognized databases such as The Work Number (TALX). See full description of verification techniques below in item 3 of this section.</p> <p>(b) Florida reports countable participation hours from the FLORIDA system screens designated for employment only when DCF workers receive, record and verify employment information submitted to DCF by the work eligible customer. Independent verification of income/hours is via employer statement or pay stubs. As a last resort, a DCF worker may contact an employer by telephone and document the information in the customer record.</p>

<p><u>Unsubsidized Employment (Cont.)</u></p> <p>3. Describe how the state verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.</p>	<p>The RWB provider personnel verify hours of actual participation from documentation that includes verification of employment, wage rate and hours, or from pay stubs, timesheets, copies of a checks, money orders, or other payment forms submitted by the work-eligible individual. If the documentation includes wages earned for hours worked during the pay period, but the hours are not explicitly documented, staff may divide wages earned for hours worked by wage per hour on record.</p> <p>The State will also use automated confirmation/documentation of employment as maintained in recognized databases such as The Work Number (TALX) to verify work hours. The Work Number provides the following information reported by more than 1000 participating employers: employee name and SSN, employment status, most recent start date and termination date (if applicable), total time with employer, job title, rate of pay, average hours per pay period, total pay for past two years, and the most recent 12 pay periods of gross earnings. The information is available in three ways: instantly via telephone verification; on-line to be printed; or a fax to the provider to serve as written documentation in the file. The most efficient way of verification for provider staff will be to receive the information by telephone, and document the call for the files.</p> <p>Staff may also verify employment hours by contacting the employer directly and documenting employment, wage rate and hours. Verification of employment hours or other employment information through employer contact must include the employer's name, date contacted, person talked with and the name of the staff who obtained the verification. Provider staff maintains written verification in the case file.</p> <p>The DCF verifies hours via employer statement or pay stubs submitted by the work-eligible individual, enters the information in FLORIDA and maintains the information in the customer record.</p> <p>Participation hours submitted in the federal reports are from either agency's automated system according to which agency receives and records the documented employment information.</p>
<p>Special Documentation:</p> <p>1. For self-employment, describe how the state counts and verifies 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.</p>	<p>Self-employment is a countable form of unsubsidized employment. To earn participation credit for hours of self-employment, a participant must provide documentation that details gross income minus business expenditures as substantiated by copies of money orders, checks, and other forms of proof of income or expenditures. Self-attestation is not acceptable as documentation. For self-employed individuals, Florida will report participation based on the number of hours that result from dividing the gross income minus business expenses (as verified by the documentation presented) by the minimum wage. Data will be entered on the appropriate system according to which agency receives the documentation. The eligibility process uses the same computational method.</p>
<p>2. If the state intends to project forward hours of participation based on current, documented, and actual hours, explain how it will make this projection.</p>	<p>Florida will project hours according to federal guidelines. The State will report projected hours of participation in unsubsidized employment for up to six months based on documented actual hours of work during an individual's first full pay cycle—i.e. weekly, bi-weekly, monthly.</p> <p>Any time personnel receive information that the individual's actual hours of work have changed, or no later than the end of any six month period, Florida will re-verify the individual's current actual average hours of work and report these projected hours of participation for another six-month period.</p>

Subsidized Private Sector Employment	
<p>1. Describe the services or programs the state includes under the activity.</p> <p>NOTE: Final Regulations indicate that the six month limit on subsidized employment and the expectation that the participant would be retained following the subsidized employment were recommendations, not requirements. Those elements were dropped from the regulations; Florida has deleted them from the plan. (It is still the program's preference that the work sites retain the participant.)</p> <p>Clarification: Effective upon approval of plan.</p>	<p>Subsidized Private Sector Employment is supervised employment in the private sector where the employer receives a subsidy to offset the cost of wages and benefits paid to a TANF participant. Florida includes the following models under subsidized private sector employment:</p> <ol style="list-style-type: none"> 1. Work supplementation—In a work supplementation model, the RWB diverts a participant's temporary cash assistance to the employer as a subsidy. The employer must pay the participant wages that equal or exceed the minimum wage. 2. Incentive payments—RWBs may offer incentive payments to employers to offset all or some of the cost of employment in an effort to encourage employers to employ program participants. 3. Supported work—The RWBs may offer a subsidy to employers to provide employment for individuals with disabilities as defined under the Rehabilitation Act of 1973 (29 U.S.C. 705(35) in an integrated setting for wages consistent with those paid to non-disabled workers in similar job functions. The workers with disabilities may receive individualized services such as transportation, family support, additional supervision and other services as required by the nature of their disability. <p>Regional Workforce Boards may develop other models but prior to implementation, they must submit them to the WFI State Board to ensure they meet definition requirements. The State will submit any substantive changes to these models as amendments to the Work Verification Plan.</p>
<p>2. Describe how the state determines the number of countable hours of participation for the activity. If the state uses different methods for different services or programs within the activity, the state should describe each.</p>	<p>Florida primarily reports countable hours of subsidized employment as verified by RWB provider staff and maintained in the workforce data entry system. On occasion, DCF workers enter countable hours previously unknown to the workforce but independently verified from customer information provided to DCF into the FLORIDA system, and those hours are also reported. Therefore, the plan describes two processes for determining the number of hours countable for participation in unsubsidized employment.</p> <p>(a) An RWB provider staff member must obtain documentation for each countable hour of participation prior to entering the hours in the workforce data entry system. The data entry system automatically generates a field to record actual hours completed for every week an activity is open on a case associated with an individual who is receiving TCA and is work-eligible. The participation field remains blank until a number from zero to greater than zero is entered in the system. Staff does not automatically enter scheduled hours but collects verification of participation before manually populating the data entry field.</p> <p>As part of the workforce process for verifying countable hours, providers may also conduct vigorous data mining to locate confirmation/documentation of employment as maintained in recognized databases such as The Work Number (TALX). See full description of verification techniques below in item three of this section.</p>

<u>Subsidized Private Sector Employment (Cont.)</u>	(b) Florida reports countable participation hours from the FLORIDA system screens designated for employment only when DCF workers receive, record and verify employment information submitted to DCF by the work eligible customer. Independent verification of income/hours is via employer statement or pay stubs. As a last resort, a DCF worker may contact an employer by telephone and document the information in the customer record.
3. Describe how the state verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.	<p>The RWB provider personnel verify hours of actual participation from documentation that includes proof of employment, wage rate and hours, or from pay stubs, timesheets, copies of a checks, money orders, or other payment forms submitted by the work-eligible individual. If the documentation includes wages earned for hours worked during the pay period, but the hours are not explicitly documented, staff may divide wages earned for hours worked by wage per hour on record.</p> <p>The State will also use automated confirmation/documentation of employment as maintained in recognized databases such as The Work Number (TALX) to verify work hours. The Work Number provides the following information reported by more than 1000 participating employers: employee name and SSN, employment status, most recent start date and termination date (if applicable), total time with employer, job title, rate of pay, average hours per pay period, total pay for past two years, and the most recent 12 pay periods of gross earnings. The information is available in three ways: instantly via telephone verification; on-line to be printed; or a fax to the provider to serve as written documentation in the file. The most efficient way of verification for provider staff will be to receive the information by telephone, and document the call for the files.</p> <p>Staff may also verify employment hours by contacting the employer directly and documenting employment, wage rate and hours. Verification of employment hours or other employment information through employer contact must include the employer's name, date contacted, person talked with and the name of the provider staff person who obtained the verification. Provider staff maintains written verification in the case file.</p> <p>The DCF verifies hours via employer statement or pay stubs submitted by the work-eligible individual, enters the information in FLORIDA and maintains the information in the customer record.</p> <p>Participation hours submitted in the federal reports are from either agency's automated system according to which agency receives and records the documented employment information.</p>
Special Documentation: If the state intends to project forward hours of participation based on current, documented, and actual hours, explain how it will make this projection.	<p>Florida will project hours according to federal guidelines. The State will report projected hours of participation in subsidized private sector employment for up to six months based on documented actual hours of work during a participant's first full pay cycle—i.e. weekly, bi-weekly, monthly. The documentation may be an employer statement that includes hours worked and wages and/or pay stubs submitted by the employed individual.</p> <p>Any time personnel receive information that the individual's actual hours of work have changed, or no later than the end of any six month period, Florida will re-verify the individual's current actual average hours of work and report these projected hours of participation for another six-month period.</p>

Subsidized Public Sector Employment	
<p>1. Describe the services or programs the State includes under the activity.</p> <p>NOTE: Final Regulations indicate that the six month limit on subsidized employment and the expectation that the participant would be retained following the subsidized employment were recommendations, not requirements. Those elements were dropped from the regulations; Florida has deleted them from the plan. (It is still the program's preference that the work sites retain the participant.)</p> <p>Clarification: Effective upon approval of plan.</p>	<p>Subsidized Public Sector Employment is supervised employment in the public or not-for profit sector where the employer receives a subsidy to offset the cost of wages and benefits paid to a TANF participant. Florida includes the following models under subsidized public sector employment:</p> <ol style="list-style-type: none"> 1. Work supplementation—In a work supplementation model, the RWB diverts a participant's temporary cash assistance to the employer as a subsidy. The employer must pay the participant wages that equal or exceed the minimum wage. 2. Incentive payments—RWBs may offer incentive payments to employers to offset all or some of the cost of employment in an effort to encourage employers to employ program participants. 3. Supported work—The RWBs may offer a subsidy to employers to provide employment for individuals with disabilities as defined under the Rehabilitation Act of 1973 (29 U.S.C. 705(35) in an integrated setting for wages consistent with those paid to non-disabled workers in similar job functions. The workers with disabilities may receive individualized services such as transportation, family support, additional supervision and other services as required by the nature of their disability. <p>Regional Workforce Boards may develop other models but prior to implementation, they must submit them to the WFI State Board to ensure they meet definition requirements. The State will submit any substantive changes to these models as amendments to the Work Verification Plan.</p>
<p>2. Describe how the state determines the number of countable hours of participation for the activity. If the state uses different methods for different services or programs within the activity, the state should describe each.</p>	<p>Florida primarily reports countable hours of subsidized employment as verified by RWB provider staff and maintained in the workforce data entry system. On occasion, DCF workers enter countable hours previously unknown to the workforce but independently verified from customer information provided to DCF into the FLORIDA system, and those hours are also reported. Therefore, the plan describes two processes for determining the number of hours countable for participation in unsubsidized employment.</p> <p>(a) An RWB provider staff member must obtain documentation for each countable hour of participation prior to entering the hours in the workforce data entry system. The data entry system automatically generates a field to record actual hours completed for every week an activity is open on a case associated with an individual who is receiving TCA and is work-eligible. The participation field remains blank until a number from zero to greater than zero is entered in</p>

<p><u>Subsidized Public Sector Employment (Cont)</u></p>	<p>the system. Staff does not automatically enter scheduled hours but collects verification of participation before manually populating the data entry field.</p> <p>As part of the workforce process for verifying countable hours, providers may also conduct vigorous data mining to locate confirmation/documentation of employment as maintained in recognized databases such as The Work Number (TALX). See full description of verification techniques below in item three of this section.</p> <p>(b) Florida reports countable participation hours from the FLORIDA system screens designated for employment only when DCF workers receive, record and verify employment information submitted to DCF by the work eligible customer. Independent verification of income/hours is via employer statement or pay stubs. As a last resort, a DCF worker may contact an employer by telephone and document the information in the customer record.</p>
<p>3. Describe how the state verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.</p>	<p>The RWB provider personnel verify hours of actual participation from documentation that includes proof of employment, wage rate and hours, or from pay stubs, timesheets, copies of a checks, money orders, or other payment forms submitted by the work-eligible individual. If the documentation includes wages earned for hours worked during the pay period, but the hours are not explicitly documented, staff may divide wages earned for hours worked by wage per hour on record.</p> <p>The State will also use automated confirmation/documentation of employment as maintained in recognized databases such as The Work Number (TALX) to verify work hours. The Work Number provides the following information reported by more than 1000 participating employers: employee name and SSN, employment status, most recent start date and termination date (if applicable), total time with employer, job title, rate of pay, average hours per pay period, total pay for past two years, and the most recent 12 pay periods of gross earnings. The information is available in three ways: instantly via telephone verification; on-line to be printed; or a fax to the provider to serve as written documentation in the file. The most efficient way of verification for provider staff will be to receive the information by telephone, and document the call for the files.</p> <p>Staff may also verify employment hours by contacting the employer directly and documenting employment, wage rate and hours. Verification of employment hours or other employment information through employer contact must include the employer's name, date contacted, person talked with and the name of the provider staff person who obtained the verification. Provider staff maintains written verification in the case file.</p> <p>The DCF verifies hours via employer statement or pay stubs submitted by the work-eligible individual, enters the information in FLORIDA and maintains the information in the customer record.</p> <p>Participation hours submitted in the federal reports are from either agency's automated system according to which agency receives and records the documented employment information.</p>
<p>Special Documentation: If the state intends to project forward hours of participation based on current, documented, and actual hours, explain how it will make this projection.</p>	<p>Florida will project hours according to federal guidelines. The State will report projected hours of participation in subsidized public employment for up to six months based on documented actual hours of work during a participant's first full pay cycle—i.e. weekly, bi-weekly, monthly. The documentation may be employer statement and/or pay stubs</p>

<p><u>Subsidized Public Sector Employment (Cont.)</u></p>	<p>submitted by the employed individual.</p> <p>Any time personnel receive information that the individual's actual hours of work have changed, or no later than the end of any six month period, Florida will re-verify the individual's current actual average hours of work and report these projected hours of participation for another six-month period.</p>
<p>Work Experience</p>	
<p>1. Describe the services or programs the state includes under the activity.</p> <p>NOTE: Final Regulations preamble discussed that using "training" in this category might be misleading. "Training" was deleted from the regulations and Florida deleted it from the definition.</p> <p>Clarification: Effective upon approval of plan.</p>	<p>Work experience is structured and supervised work in exchange for benefits for individuals who lack preparation for or experience in the workforce. Work experience is placement of a participant at a worksite to gain experience at work to help the participant join the workforce. Work experience must provide an individual with an opportunity to gain general employability skills, job knowledge and work habits necessary to obtain and retain employment. Work experience may be at a for-profit or not-for-profit entity and must be developed by a contract with the worksite entity. Prior to placement, provider staff members evaluate potential work experience providers to match the participant with a position related to the participant's employment goals and the needs of the worksite sponsor. The work experience contract must include performance benchmarks, goals, outcomes and time limits to ensure participants are moving toward employment and self-sufficiency as well as the requirements for supervision and verification of participation hours.</p> <p>The State will establish a clear displacement policy and distribute it to RWBs to be in place by approval of the Work Verification Plan. A grievance process already exists for individuals who feel that they have been displaced by worksite placements.</p>
<p>2. Describe how the state determines the number of countable hours of participation for the activity. If the state uses different methods for different services or programs within the activity, the state should describe each.</p>	<p>a) The RWB provider determines the maximum number of hours per month to schedule a participant in this activity by adding the amount of the temporary cash assistance and the food stamp allotment and dividing the resulting figure by the Florida minimum wage. The hours can be used with flexibility during each week so long as they do not exceed the monthly maximum.</p> <p>b) An RWB staff member must obtain documentation for each countable hour of participation prior to entering the hours in the workforce data entry system. The data entry system automatically generates a field to record actual hours completed for every week an activity is open on a case associated with an individual who is receiving TCA and is work eligible. The data entry field remains blank until a number from zero to greater than zero is entered in the system. A provider staff member does not automatically enter scheduled hours, but collects verification of each hour before manually populating the data entry field.</p>
<p>3. Describe how the state verifies the actual hours of participation for the</p>	<p>The workforce data entry system generates a field to record actual hours of participation for each week an individual</p>

<p><u>Work Experience (Cont.)</u></p> <p>activity. Include the procedures for obtaining and maintaining documentation of hours of participation.</p> <p>NOTE: Final Regulations clarified that the earlier language in the preamble of the Interim Regulations about the suggestion to submit documentation on unpaid work activities no less often than every two weeks was unnecessary. It is sufficient to have monthly participation data documented in the file.</p> <p>Clarification: Effective upon approval of plan.</p>	<p>receives TCA, is work-eligible and assigned to a work experience activity. Documentation of participation hours may include time logs maintained by the participant and signed by the supervisor or work site- generated attendance records signed by the supervisor.</p> <p>Provider staff members negotiate the terms of required hours of participation and daily supervision in each Work Experience contract. To ensure accurate participation hours and daily supervision, the required documentation must include the signature of an employer, worksite sponsor or other responsible party designated as supervisor and must be forwarded to the RWB provider staff on a regular schedule no less than monthly. Staff members manually enter hours into the workforce system based on verification of actual hours completed, and maintain the verification in the case file to support participation data. Because work experience is a structured program, workforce staff will communicate with the worksite supervisor on a regular basis to verify attendance and progress.</p>
<p>4. Describe the methods of daily supervision that the state will use.</p>	<p>Florida’s Work Experience program requires supervision of each work experience assignment by a designated work site supervisor on a daily basis. Documentation of attendance by worksite staff, along with regular communication between the RWB provider and worksite supervisor/coordinator will demonstrate daily supervision. Provider staff members enter the hours in the workforce data entry system and maintain the verification in the case file.</p>
<p>Special Documentation:</p> <p>None</p>	
<p>On-the-Job Training</p>	
<p>1. Describe the services or programs the state includes under the activity.</p> <p>NOTE: Final Regulations indicate that the expectation for the employer to retain the participant following the completion of the OJT was a recommendation, not a requirement. This element was dropped from the regulations; Florida has deleted them from the plan. (It is still the program’s preference that the work sites retain the participant.)</p>	<p>On-the-Job Training (OJT) is paid employment provided by a public or private employer through a contractual arrangement in which the employer provides training and skills essential to perform the job, and the RWB reimburses the employer for a portion of or all the added costs associated with training. An OJT position is distinguished from subsidized employment because it focuses on training and intensive education opportunities coupled with employment opportunities. OJT includes an agreement between the RWB and the employer and/or educational institution.</p> <p>Supported Work: the RWBs may offer a subsidy to employers to provide employment for individuals with disabilities as</p>

<p><u>On the Job Training (Cont.)</u></p> <p>Clarification: Effective upon approval of plan.</p>	<p>defined under the Rehabilitation Act of 1973 (29 U.S.C 705(35) in an integrated setting for wages consistent with those paid to non-disabled workers in similar job functions. The workers with disabilities may receive individualized services such as transportation, family support, additional supervision or other services as required by the nature of the disability.</p>
<p>2. Describe how the state determines the number of countable hours of participation for the activity. If the state uses different methods for different services or programs within the activity, the state should describe each.</p>	<p>An RWB staff member must obtain documentation for each countable hour of participation prior to entering the hours in the workforce data entry system. The data entry system automatically generates a field to record actual hours completed for every week an activity is open on a case associated with an individual who is receiving TCA and is work-eligible. The participation field remains blank until a number from zero to greater than zero is entered in the system. A provider staff member does not automatically enter scheduled hours, but verifies participation for each hour before manually populating the data entry field.</p>
<p>3. Describe how the state verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.</p>	<p>The RWB provider personnel verify hours of actual participation from documentation that includes proof of employment, wage rate and hours, or from pay stubs, timesheets, copies of a checks, money orders, or other payment forms submitted by the work-eligible individual. If the documentation includes wages earned for hours worked during the pay period, but the hours are not explicitly documented, staff may divide wages earned for hours worked by wage per hour on record.</p> <p>The State will also use automated confirmation/documentation of employment as maintained in recognized databases such as The Work Number (TALX) to verify work hours. The Work Number provides the following information reported by more than 1000 participating employers: employee name and SSN, employment status, most recent start date and termination date (if applicable), total time with employer, job title, rate of pay, average hours per pay period, total pay for past two years, and the most recent 12 pay periods of gross earnings. The information is available in three ways: instantly via telephone verification; on-line to be printed; or a fax to the provider to serve as written documentation in the file. The most efficient way of verification for provider staff will be to receive the information by telephone, and document the call for the files.</p> <p>Staff may also verify employment hours by contacting the employer directly and documenting employment, wage rate and hours. Verification of employment hours or other employment information through employer contact must include the employer's name, date contacted, person talked with and the name of the provider staff person who obtained the verification. Provider staff maintains written verification in the case file.</p> <p>The DCF verifies hours via employer statement or pay stubs submitted by the work-eligible individual, enters the information in FLORIDA and maintains the information in the customer record.</p>

	<p>Participation hours submitted in the federal reports are from either agency's automated system according to which agency receives and records the documented employment information.</p>
<p>On the Job Training (Cont.) 4. Describe the methods of daily supervision that the state will use.</p>	<p>As part of each OJT contract, Florida requires daily on-site supervision and regular documentation of attendance hours by the employer or designated site supervisor. Like other forms of employment, proof of hours paid serves as documentation of daily supervision. Provider staffs maintain the documentation of supervision in the case file.</p>
<p>Special documentation</p> <p>1. Describe the nature of training provided by employers that distinguishes this from subsidized employment.</p> <p>2. If the state intends to project hours of participation based on current, documented, and actual hours, explain how it will make this projection.</p>	<p>1. The employer or educational institution, on behalf of the employer, receives a subsidy to offset the cost of the training provided to the participant. Unlike work experience, the individual is in paid employment during the training process. To be distinguished from subsidized employment, the RWBs base each OJT position on a contractual agreement that requires the participant to be trained for a specific (or similar) employment position while working. The type of training slots for participants will vary based on the labor market and employment openings in the local area, the participant's goals and the employer's skill requirements for hiring. Training should include employability skills, such as organization, communication, problem solving, listening, cooperation skills and other skills specific to the employment position.</p> <p>2. Florida will use the "project forward hours" provision. The State will report projected hours of employment participation for up to six months based on documented actual hours of work during a participant's first full pay cycle—i.e. weekly, bi-weekly, monthly. The documentation may be employer statement of wages and hours and/or pay stubs submitted by the employed individual.</p> <p>Any time workforce staff members receive information that the individual's actual hours of work have changed, or no later than the end of any six month period, they will re-verify the individual's current actual average hours of work and Florida will report these projected hours of participation for another six-month period.</p>
<p>Job Search and Job Readiness</p>	
<p>1. Describe the services or programs the state includes under the activity.</p>	<p>Job Search and Job Readiness activities are those that include the act of seeking or obtaining employment, as well as learning how to seek employment. Providers may offer information and build skills during formal, planned workshops and classes or through less structured individualized activities.</p> <p>JS/JR may include the following activities directly related to preparing for or finding employment: orientation to the world of work; budgeting; life skills; interpersonal skills; decision making skills; time management; basic job seeking skills; job retention skills; instruction in completing an application; interviewing skills; resume development; appropriate dress; career planning; the completion of job applications; the submission of resumes; employment interviews; orientation/group interviews. It will <u>not</u> include looking for child care, housing or other non-work activities.</p>

	<p>Participants will also have access to well-equipped resource centers with computers and/or print materials to help them to apply for jobs, develop resumes, cover letters and follow-up letters, etc. Participants may also apply for jobs directly with an employer.</p> <p>Substance abuse and mental health services may be considered part of the job search and job readiness activity. The individual must be determined to be in need of SAMH treatment by a substance abuse and mental health professional. Treatment may include in-patient or out-patient classes, workshops, group therapy, individual therapy, detoxification, rehabilitation activities and other sessions determined medically necessary.</p>
<p>2. Describe how the state determines the number of countable hours of participation for the activity. If the state uses different methods for different services or programs within the activity, the state should describe each.</p> <p>NOTE: In accordance with final TANF regulations, Florida will convert the allowable six weeks of JS/JR into hours and will allow not more than 120 hours for a single parent with a child under six, or 180 hours for all other work eligible individuals during any 12-month period. The State will maintain its limit on no more than four consecutive weeks of Job Search/Job Readiness.</p> <p>Change: Effective October 1, 2008.</p> <p>NOTE: Preamble discussion allows inclusion of travel time between job sites during Job Search activities as countable participation hours. A state may count travel time between job search interviews but not from home to the first interview or from the last interview home.</p> <p>Clarification: Effective upon approval of plan.</p> <p>NOTE: Final Regulations clarified that the earlier language in the preamble of the Interim Regulations about the suggestion to submit documentation on unpaid work activities no less often than every two weeks was unnecessary. It is sufficient to have monthly participation data documented in the file.</p> <p>Clarification: Effective upon approval of plan.</p>	<p>An RWB provider staff member must secure documentation for each countable hour of participation prior to entering the hours in the workforce data entry system. The data entry system automatically generates a field to record actual hours completed for every week an activity is open on a case associated with an individual who is receiving TCA and is work-eligible. The participation field remains blank until a number from zero to greater than zero is entered in the system. A provider staff member does not automatically enter scheduled hours, but verifies participation for each hour before manually populating the data entry field.</p> <p>Providers will enter actual hours spent in a structured in-house <u>job readiness</u>, and/or a structured in-house <u>job search</u> program or at a SAMH treatment program as countable hours of participation. The RWB provider staff will track hours spent in structured in-house job readiness assistance and structured, in-house job search and enter the hours into the workforce data entry system as described above. Substance abuse and mental health treatment hours will be recorded on time logs/time sheets kept by the participant and signed by the SAMH supervisor or by attendance records maintained and signed by the SAMH site professional and submitted regularly to the RWB.</p> <p>The participant must record each on-site job contact on a personal activities log. The log will serve as documentation of a participant's actual hours of job searching plus the time it takes to get from job site to job site. The participant must submit the log of the daily job contacts in accordance with a schedule established by the RWB or no less than monthly. A representative of the employer or a RWB provider staff member may certify the validity of the log by initialing each entry. Participants conducting job searches via telephone and via internet must record their activities on the job search report form and must include detailed, specific information to allow for follow-up and verification by RWB provider staff. The timesheet entries will serve as the basis for recording countable hours of participation.</p>
<p>3. Describe how the state determines the number of countable hours of</p>	<p>An RWB provider staff member must secure documentation for each countable hour of participation prior to entering the hours in the workforce data entry system. The data entry system automatically generates a field to record actual</p>

<p><u>Job Search and Job Readiness (Cont.)</u></p> <p>participation for the activity. If the state uses different methods for different services or programs within the activity, the state should describe each.</p>	<p>hours completed for every week an activity is open on a case associated with an individual who is receiving temporary cash assistance and required to participate in the work program. The participation field remains blank until a number from zero to greater than zero is entered in the system. A provider staff member does not automatically enter scheduled hours, but verifies participation for each hour before manually populating the data entry field.</p> <p>Providers will enter actual hours spent in a structured in-house <u>job readiness</u>, and/or a structured in-house <u>job search</u> program or at a SAMH treatment program as countable hours of participation. The RWB provider staff will track hours spent in structured in-house job readiness assistance and structured, in-house job search and enter the hours into the workforce data entry system as described above. Substance abuse and mental health treatment hours will be recorded on time logs/time sheets kept by the participant and signed by the SAMH supervisor or by attendance records maintained and signed by the SAMH site professional.</p> <p>The participant must record each on-site job contact on a manually maintained activities log. The log will be a record of a participant's actual hours of job searching. The participant must submit the log of the daily job contacts at least bi-weekly. A representative of the employer or a RWB provider staff member may certify the validity of the log by initialing each entry. Participants conducting job searches via telephone and via internet must record their activities on the job search report form and must include detailed, specific information to allow for follow-up and verification by RWB provider staff. The timesheet entries will serve as the basis for recording countable hours of participation.</p>
<p>4. Describe how the state verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.</p>	<p>The State will report actual hours spent in a structured, in-house job readiness program and in a structured, in-house job search program as countable hours of participation. The RWB provider staff will track hours spent in job readiness assistance and on in-house job search and enter the hours into the workforce data entry system. Local operating procedures will define acceptable documentation and may include sign in/activity logs that are verified by the provider staff, the RWB automated tracking processes or other activity tracking processes that are established by the RWB. (RWBs using the Florida job matching system can verify time spent in job search.)</p> <p>On-site job search includes making contact with potential employers to learn of suitable job openings via telephone; via the internet and/or in person; applying for those jobs; and interviewing for jobs. Participants will be required to complete the job search report form, which must include specific information on all contacts completed via telephone and via the internet. All in-person visits to an employer, all applications submitted and all interviews for job openings must be documented and signed by the employer or the employer-designated supervisor. A contact number must be provided unless the RWB provider verifies the completion of on-site activities through another procedure, such as random contacts or receipt of copies of applications.</p> <p>The provider must retain documentation of job search activities in the case file to support participation data.</p> <p>The RWB provider staff will verify the participation information used to certify hours in job search and job readiness activities by conducting a random review of representative number or no fewer than 10% of participant logs and timesheets monthly and take corrective action if any entries prove inaccurate.</p>

<p>Job Search and Job Readiness (Cont.)</p> <p>5. Describe the methods of daily supervision that the state will use.</p>	<p>Florida’s job search (both in-house and on-site) and job readiness assistance require daily supervision and documentation of attendance by the employer or appropriate RWB provider staff.</p> <p>RWB provider staff will supervise in-house job search and job readiness assistance on a daily basis as part of a structured activity.</p> <p>On-site job search hours and travel hours will be maintained on a daily basis using signed timesheets/contact sheets, job search/travel logs, maintained by the participants or other activity tracking processes established by the RWB provider. Provider staff will supervise on-site job search on a daily basis using telephonic contact, facsimile communication, in-person interviews, and other communication processes defined by the RWB and used in daily operations to track and supervise other job seeker groups (for example – WIA and Unemployment Compensation job seekers).</p> <p>Substance abuse and mental health practitioners will supervise participants during any treatment or counseling sessions and their signature on the participant’s time log will serve as documentation of supervision.</p>
<p>Special documentation: Substance Abuse and Mental Health (SAMH) services can only be counted for the hours an individual is in actual SAMH activities. If treatment is credited, a SAMH professional must certify that such treatment is necessary.</p> <p>1. If the state intends to count substance abuse treatment, mental health treatment and rehabilitation activities, describe the criteria to determine whether the 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.</p> <p>NOTE: The requirements related to “otherwise employable” and that the SAMH professional be certified have been deleted from the final regulations. Florida is eliminating “otherwise employable,” but SAMH professionals in Florida must be licensed.</p> <p>Change: Effective October 1, 2008</p> <p>2. Describe how the state ensures there are 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).</p>	<p>1. Using a brief screening tool provided by the SAMH provider, RWB provider staff identify participants likely to be in need of SAMH intervention. The work force providers refer these participants to the SAMH provider for more in-depth assessment. The medical or mental health professional who determines treatment will be licensed and/or board certified to practice in the State of Florida (per F. S. 414.0655). However, licensed practitioners do not lead all treatment sessions. Counselors or lay staffs lead some sessions. The RWB provider staff must verify the hours completed in the SAMH program through an attendance log or other SAMH documentation in order to input the hours in the workforce data entry system participation field.</p> <p>2. The DCF maintains a historical file of work eligible individuals for the preceding 12-month period in which hours engaged in job search were used to meet the work participation requirement. The file contains each individual’s personal identification number and the begin date of the week for each hour/week used. Before reporting hours engaged in job search to meet work participation requirements, DCF checks this file to ensure that neither more than a total of 120/180 hours, nor more than four consecutive weeks are reported for participation. (Any time Florida is classified as a “needy” state, DCF will invoke the more liberal limitations of 12 weeks or 240/360 hours for Job Search Job Readiness.)</p>
<p>Community Service Program</p>	
<p>1. Describe the services or programs the state includes under the activity.</p>	<p>Community Service Programs are structured programs in which TCA work-eligible recipients perform work for the direct</p>

<p><u>Community Service Program (Cont.)</u></p>	<p>benefit of the community under the auspices of not-for-profit or public organizations. The state limits community service programs 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.</p> <p>RWBs design community service programs to improve the employability of recipients with few skills and little employment experience. Prior to making a community service assignment, the RWB considers the participants' prior training, experience and skills in consultation with the participating community agency in order to ensure a positive outcome for both the participant and the agency.</p> <p>Community service programs are most appropriate for a participant who needs to increase employability by improving his or her interpersonal skills and job retention skills, or who needs to learn stress management, problem solving, and how to attain a balance between job and personal responsibilities.</p>
<p>2. Describe how the state determines the number of countable hours of participation for the activity. If the state uses different methods for different services or programs within the activity, the state should describe each.</p>	<p>1. The RWB determines the maximum number of hours a participant may be scheduled in this activity for the month by adding the amount of TCA and the food stamp benefit amount and dividing the resulting figure by the Florida minimum wage.</p> <p>2. An RWB provider staff member must obtain documentation for each countable hour of participation prior to entering the hours in the workforce data entry system. The data entry system automatically generates a field to record actual hours completed for every week an activity is open on a case associated with an individual who is receiving TCA and is work-eligible. The participation field remains blank until a number from zero to greater than zero is entered in the system. A provider staff member does not automatically enter scheduled hours, but verifies each hour before manually populating the data entry field.</p>
<p>3. Describe how the state verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.</p> <p>NOTE: Final Regulations clarified that the earlier language in the preamble of the Interim Regulations about the suggestion to submit documentation on unpaid work activities no less often than every two weeks was unnecessary. It is sufficient to have monthly participation data documented in the file.</p> <p>Clarification: Effective upon approval of plan.</p>	<p>The RWB provider verifies each hour of actual participation through time logs maintained by the participant and signed by the site supervisor or through attendance records kept by the designated representative of the community service provider. The automated system generates a field to record actual hours of participation each week the individual receives TCA and is work eligible and assigned to community service. Documentation of hours of participation must be forwarded to the RWB provider staff in accordance with the schedule or no less than monthly and must include time logs, daily attendance records, or some other form of attendance record signed by a designated party at the community service organization. RWB provider staffs enter countable hours in the workforce data entry system, and maintain the verification in the case file to support participation data. Because a community service program is a structured program, workforce staffs communicate with the worksite supervisor and verify attendance and progress on a regular basis.</p>

<p>Community Service Program (Cont.)</p> <p>4. Describe the methods of daily supervision that the state will use.</p>	<p>Florida's Community Service Work Experience program requires daily supervision by the work site supervisor. The supervisor-signed participant time logs or other attendance records will serve as evidence of daily supervision. The RWB provider staff members enter the hours in the workforce data entry system and maintain the verification of attendance and supervision in the case file.</p>
<p>Special Documentation</p> <p>1. 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.</p> <p>3. If a state permits self-initiated community service positions, describe how it determines that the position provides a direct community services and improves the recipient's employability.</p>	<p>1. The RWB enters into a community service program contract with the not-for-profit or public organization selected for the community service program participant, creating an employee/employer relationship.</p> <p>The RWB provider assigns scheduled hours for the month based on the following calculation: TCA amount added to the food stamp benefit amount, divided by the Florida minimum wage. Providers may assign weekly hours with flexibility so long as they do not exceed the maximum hours for the month.</p> <p>2. The participant may locate a community service project by personal initiative and inform the RWB provider. The RWB provider will negotiate a community service program contract with the community service agency that includes all required provisions of state and federal regulations.</p>
<p>Vocational Education and Training</p>	
<p>1. Describe the services or programs the state includes under the activity.</p> <p>NOTE: Final Regulations changed the instructions on vocational education. States are now allowed to structure programs using vocational education as a component that may lead to a baccalaureate or other advanced degree. Change: Effective October 1, 2008.</p>	<p>This activity is education and training that prepares the individual for employment in current or emerging occupations through organized and state approved training in Florida's vocational technical area centers, community colleges offering certificate, AA/AS, and other advanced degree programs and proprietary schools. With careful planning, the provider and participant may be able to combine vocational education and training with other work activities in ways that lead to a baccalaureate or other advanced degree.</p> <p>Florida does not allow stand alone basic skills or English language proficiency classes to be offered as vocational education; however, vocational education curriculum structure does provide for those skills to be embedded in the programs if they are required for the success of the student.</p>

<u>Vocational Education and Training (Cont.)</u>	
<p>2. Describe how the state determines the number of countable hours of participation for the activity. If the state uses different methods for different services or programs within the activity, the state should describe each.</p> <p>NOTE: Final Regulations gave guidance on documentation needed in order to count unsupervised homework hours along with the previously allowed supervised only homework hours.</p> <p>Change: Effective October 1, 2008.</p>	<p>An RWB provider staff member must secure documentation for each countable hour of participation prior to entering the hours in the workforce data entry system. The data entry system automatically generates a field to record actual hours completed for every week an activity is open for an individual who is receiving TCA and is work-eligible. The participation field remains blank until a number from zero to greater than zero is entered in the system. A provider staff member does not automatically enter scheduled hours, but verifies each hour before manually populating the data entry field.</p> <p>In addition to actual classroom hours, countable hours may include supervised time spent in curriculum-required labs and clinical settings, supervised study halls as well as up to one hour of unsupervised homework time for each hour of class time. Total homework time counted for participation cannot exceed the hours required or advised by the educational program/instructor.</p>
<p>3. Describe how the state verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.</p> <p>Note: Final Regulations clarified that the earlier language in the preamble of the Interim Regulations about the suggestion to submit documentation on unpaid work activities no less often than every two weeks was unnecessary. It is sufficient to have monthly participation data documented in the file.</p> <p>Clarification: Effective upon approval of plan.</p>	<p>The RWB provider personnel verify hours of actual participation through documentation that includes time logs kept by participants and signed by a supervisor or other institution attendance records submitted to the RWB provider in accordance with the attendance/progress report schedule or no less than monthly. The provider staff may also verify participation hours by contacting an instructor, other supervisor, or institution directly. Attendance information must include the participant's name, the course, lab or study hall, the inclusive dates of attendance, instructor's/supervisor's name and if different, the name of the person/institution certifying attendance. An RWB provider staff member enters the information in the workforce data entry system and maintains the verification in the case file to support participation data.</p>
<p>4. Describe the methods of daily supervision that the state will use.</p> <p>NOTE: Final Regulations clarified that distance learning is allowable with proper supervision and documentation.</p> <p>Clarification: Effective upon approval of plan.</p>	<p>Vocational Education and Training requires daily supervision. At the beginning of each semester, participants are required to document schedules and course requirements. The time logs documenting hours of participation will be signed by a designated party, verified by an electronic logging function as established by the educational/distance learning institution or the RWB may contact the institution directly. Documentation of actual hours completed demonstrates daily supervision.</p>
<p>Special Documentation:</p> <p>1. Describe how the state ensures participation in vocational educational</p>	<p>1. The DCF maintains a historical file of work eligible individuals whose countable hours engaged in vocational education have been used to satisfy work participation. The file contains the individual's personal identification number and each month that vocational education was used to meet work participation. Before submitting any vocational education hours to meet work participation requirements for an individual, DCF checks this file to ensure that not more</p>

<p><u>Vocational Education and Training (Cont.)</u></p> <p>training does not count beyond the statutory limitations limiting participation to 12 months lifetime per individual?</p> <p>2. Explain how the state will ensure that basic and remedial education and ESL, if such activities are counted, are of limited duration and a necessary or regular part of the vocational training?</p>	<p>than 12 months in a lifetime have been used.</p> <p>2. Florida's career education/vocational programs have been restructured to require general basic or remedial education be completed before entry into the technical program itself. Each program has a series of completion points that correlate to the ability of the trainee and employment entry point. A person needing specific remedial work related to the vocational technical program enters the program at a lower completion point level, and then progresses up through the curriculum. Remedial skills are integrated as part of the technical skills segments. For instance, if a trainee in a construction program needs proficiency in a math skill related to measurement or angles, that particular skill will be taught in the context of the construction application, but not a complete remedial math course. The same is true with English language proficiency; the trainee learns the English language terms and procedures in the context of the vocational skill. Thus, the nature of curriculum design limits remedial work and English language proficiency training and ensures they are of short duration.</p>
<p>Job Skills Training Directly Related to Employment</p>	
<p>1. Describe the services or programs the state includes under the activity.</p> <p>NOTE: Final Regulations gave guidance on documentation needed in order to count unsupervised homework hours along with the previously allowed supervised only homework hours.</p> <p>Change: Effective October 1, 2008.</p>	<p>This work activity is education or training 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. It includes customized training to meet the needs of a specific employer or it can be general training that prepares an individual for employment. This activity may include literacy and language instruction, when such instruction is explicitly focused on skills needed for employment or combined in a unified whole with the job training. Post-secondary education that leads to a bachelor's or advanced degree may count as job skills training, if it is directly related to employment.</p> <p>In addition to actual classroom hours, countable hours may include supervised time spent in curriculum-required labs and clinical settings, supervised study halls as well as up to one hour of unsupervised homework time for each hour of class time. Total homework time counted for participation cannot exceed the hours required or advised by the educational program/instructor.</p>
<p>2. Describe how the state determines the number of countable hours of participation for the activity. If the state uses different methods for different services or programs within the activity, the state should describe each.</p>	<p>An RWB provider staff member must obtain documentation for each countable hour of participation prior to entering the hours in the workforce data entry system. The data entry system automatically generates a field to record actual hours completed for every week an activity is open on an individual who is receiving TCA and is work-eligible. The participation field remains blank until a number from zero to greater than zero is entered in the system. A provider staff member does not automatically enter scheduled hours, but verifies each hour before manually populating the data entry field.</p> <p>In addition to actual classroom hours, countable hours may include supervised time spent in curriculum-required labs and clinical settings, supervised study halls as well as up to one hour of unsupervised homework time for each hour of class time. Total homework time counted for participation cannot exceed the hours required or advised by the educational program/instructor.</p>

<p><u>Job Skills Training Directly Related to Employment (Cont.)</u></p> <p>3. Describe how the state verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.</p> <p>Note: Final Regulations clarified that the earlier language in the preamble of the Interim Regulations about the suggestion to submit documentation on unpaid work activities no less often than every two weeks was unnecessary. It is sufficient to have monthly participation data documented in the file.</p> <p>Clarification: Effective upon approval of plan.</p>	<p>The RWB provider personnel verify hours of actual participation through documentation that includes time logs kept by the participant and signed by a supervisor as well as other daily attendance records developed and used by the facility or job site and signed by a supervisor or other designated personnel. The participant, the training facility or the job site must submit the attendance records to the provider in accordance with the report schedule or no less than monthly. The RWB provider staff may also verify participation hours by contacting an instructor or other site supervisor directly. Attendance information must include the participant's name, the course and instructor's name if the training takes place in a training facility, the name of the site-designated person certifying attendance and the inclusive dates of attendance. An RWB provider staff member enters the information in the workforce data entry system and maintains the verification in the case file to support participation data.</p>
<p>4. Describe the methods of daily supervision that the state will use.</p> <p>NOTE: Final Regulations clarified that distance learning is allowable with proper supervision and documentation.</p> <p>Clarification: Effective upon approval of plan.</p>	<p>The State requires daily supervision of this activity. The time logs documenting hours of participation will be signed by a designated party, verified by an electronic logging function as established by the educational/distance learning institution or the RWB may contact the institution directly. Documentation of actual hours completed demonstrates daily supervision.</p>
<p>Special Documentation:</p> <p>NONE</p>	
<p>Education Directly Related to Employment</p>	
<p>1. Describe the services or programs the state includes under the activity.</p>	<p>This is an educational activity for participants, regardless of age, who have not received a high school diploma or GED and need further education related to a job in a specific occupation, job, or job offer. However, on a case by case basis, RWBs may enroll individuals with high school credentials from other countries into this activity if assessment indicates the person cannot function at U.S. high school level. It may include the following activities: Adult Basic Education (ABE); English as a Second Language (ESL); and literacy skills. It may include classes to obtain a GED, supervised homework and study activities and testing to acquire GED certification where required as a prerequisite for employment.</p>
<p>2. Describe how the state determines the number of countable hours of</p>	<p>An RWB provider staff member must obtain documentation for each countable hour of participation prior to entering</p>

<p><u>Education Directly Related to Employment (Cont.)</u></p> <p>participation for the activity. If the state uses different methods for different services or programs within the activity, the state should describe each.</p>	<p>the hours in the workforce data entry system. The data entry system automatically generates a field to record actual hours completed for every week an activity is open on an individual who is receiving TCA and is work-eligible. The participation field remains blank until a number from zero to greater than zero is entered in the system. A provider staff member does not automatically enter scheduled hours, but verifies each hour before manually populating the data entry field.</p> <p>In addition to actual classroom hours, countable hours may include supervised time spent in curriculum-required labs and clinical settings, supervised study halls as well as up to one hour of unsupervised homework time for each hour of class time. Total homework time counted for participation cannot exceed the hours required or advised by the educational program/instructor.</p>
<p>3. Describe how the state verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.</p> <p>Note: Final Regulations clarified that the earlier language in the preamble of the Interim Regulations about the suggestion to submit documentation on unpaid work activities no less often than every two weeks was unnecessary. It is sufficient to have monthly participation data documented in the file.</p> <p>Clarification: Effective upon approval of plan.</p> <p>NOTE: Final Regulations gave guidance on documentation needed in order to count unsupervised homework hours along with the previously allowed supervised only homework hours.</p> <p>Change: Effective October 1, 2008.</p>	<p>The RWB provider staff verify hours of actual participation through documentation that includes time logs kept by the participant and signed by the supervisor and daily attendance records maintained by the educational institution and signed by a designated supervisor. The participants or institution must submit attendance proof to the RWB in accordance with the report schedule or no less than monthly. The RWB provider staff may also verify participation hours by contacting an instructor or other supervisor directly. Attendance information must include the participant's name, the course and instructor's name if the training takes place in a training facility, the name of the person certifying attendance and the inclusive dates of attendance. An RWB provider staff member enters the information in the workforce data entry system and maintains the verification in the case file to support participation data.</p> <p>In addition to actual classroom hours, countable hours may include supervised time spent in curriculum-required labs and clinical settings and supervised study halls. With supporting documentation from a course instructor or the institution as to the expectations for homework or study time required, one hour of unsupervised study/homework time for each hour of classroom time may also become countable hours.</p>
<p>4. Describe the methods of daily supervision that the state will use.</p> <p>NOTE: Final Regulations clarified that distance learning is allowable with proper supervision and documentation.</p> <p>Clarification: Effective upon approval of plan.</p>	<p>The State requires daily supervision of this activity. The time logs documenting hours of participation will be signed by a designated party, verified by an electronic logging function as established by the educational/distance learning institution or the RWB may contact the institution directly. Documentation of actual hours completed demonstrates daily supervision.</p>
<p>Special Documentation: 1. Describe the state's criteria for "good or satisfactory progress" and how it is</p>	

<p><u>Education Directly Related to Employment (Cont.)</u></p> <p>documented.</p> <p>NOTE: This description of progress was deleted in the final regulations.</p> <p>Clarification: Because this was a “suggestion” from the preamble of the Interim Regulations, and is being omitted from the final regulations, Florida plans to implement this item immediately as a clarification, not a change.</p>	
<p>Satisfactory Attendance at a Secondary School or in a Course of Study Leading to a GED (recipient who has not completed secondary school or received a GED)</p>	
<p>1. Describe the services or programs the state includes under the activity.</p> <p>NOTE: Final Regulations gave guidance on documentation needed in order to count unsupervised homework hours along with the previously allowed supervised only homework hours.</p> <p>Change: Effective October 1, 2008.</p>	<p>Florida restricts this educational work activity to participants without a high school diploma or GED. However, on a case by case basis, RWBs may enroll individuals with high school credentials from other countries into this activity if assessment indicates the person cannot function at U.S. high school level. The individual must regularly attend classes that are a part of a secondary diploma or an equivalent course of study. This may include other literacy education if related to securing a diploma or a GED. Any hours counted toward completing an adult basic education program must be directly related to obtaining a high school diploma or GED. Hours counted under this activity may include, in addition to supervised homework time, one hour of unsupervised homework time for each hour of classroom time if its need is documented by the instructor, website instructions or institution’s description of the curriculum.</p>
<p>2. Describe how the state determines the number of countable hours of participation for the activity. If the state uses different methods for different services or programs within the activity, the state should describe each.</p>	<p>An RWB provider staff member must obtain documentation for each countable hour of participation prior to entering the hours in the workforce data entry system. The data entry system automatically generates a field to record actual hours completed for every week an activity is open on an individual who is receiving TCA and is work-eligible. The participation field remains blank until a number from zero to greater than zero is entered in the system. A provider staff member does not automatically enter scheduled hours, but verifies each hour before manually populating the data entry field.</p>
<p>3. Describe how the state verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.</p>	<p>The RWB provider staff verify hours of actual participation through documentation that includes time logs kept by participants and signed by a supervisor or other daily attendance records kept by the institution and signed by a designated supervisor. Participants and institutions must submit attendance logs or records to the RWB provider in accordance with the report schedule or no less than monthly. The RWB provider staff may also verify participation hours by contacting an instructor or other designated supervisor directly. Attendance information must include the</p>

<p><u>Satisfactory Attendance at a Secondary School or in a Course of Study Leading to a GED (Cont.)</u></p> <p>Note: Final Regulations clarified that the earlier language in the preamble of the Interim Regulations about the suggestion to submit documentation on unpaid work activities no less often than every two weeks was unnecessary. It is sufficient to have monthly participation data documented in the file.</p> <p>Clarification: Effective upon approval of plan.</p>	<p>participant’s name, the course and instructor name if the training takes place in a training facility, the name of the person certifying attendance and the inclusive dates of attendance. An RWB provider staff member enters the information in the tracking system and maintains the verification in the case file to support participation data.</p>
<p>4. Describe the methods of daily supervision that the state will use.</p> <p>NOTE: Final Regulations clarified that distance learning is allowable with proper supervision and documentation.</p> <p>Clarification: Effective upon approval of plan.</p>	<p>The State requires daily supervision of this activity. The time logs documenting hours of participation will be signed by a designated party, verified by an electronic logging function as established by the educational/distance learning institution or the RWB may contact the institution directly. Documentation of actual hours completed demonstrates daily supervision.</p>
<p>Special Documentation:</p> <p>1. Describe the state’s criteria for “good or satisfactory progress” and when and how it is documented.</p> <p>NOTE: This description of progress was deleted in the final regulations.</p> <p>Clarification: Because this was a “suggestion” from the preamble of the Interim Regulations, and is being omitted from the final regulations, Florida plans to implement the item immediately as a clarification, not a change.</p>	
<p>Providing Child Care Services</p>	

<p>1. Describe the services or programs the state includes under the activity.</p>	<p>Providing childcare 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 does not include providing child care to enable a TANF recipient to participate in any of the other eleven allowable work activities and the childcare provider may not be paid for the activity. In a two-parent family, one parent cannot count as participating by providing child care for his or her own child while the other parent participates in community service unless allowable by federal law or guidance.</p>
<p>2. Describe how the state determines the number of countable hours of participation for the activity. If the state uses different methods for different services or programs within the activity, the state should describe each.</p>	<p>The maximum number of hours an individual providing childcare services to a community services program participant is equal to the number of hours assigned to the participant in a community service program. The calculation for determining the maximum number of hours has been described in the Community Service Program section of the plan.</p>
<p>3. Describe how the state verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.</p> <p>NOTE: Final Regulations clarified that the earlier language in the preamble of the Interim Regulations about the suggestion to submit documentation on unpaid work activities no less often than every two weeks was unnecessary. It is sufficient to have monthly participation data documented in the file.</p> <p>Clarification: Effective upon approval of plan.</p>	<p>Provider staff verify hours of actual participation through documentation of hours that may include timesheets and attendance records kept by both the childcare provider and the community service participant. The documentation of countable hours for the participant providing childcare services will include the signature of the individual completing the community service hours. The participant in the community service program and the child care provider must provide documentation of hours to the RWB provider staff in accordance with a report schedule or no less than monthly. The data entry system automatically generates a field to record actual hours completed for every week an activity is open on an individual who is receiving TCA and is work-eligible. The participation field remains blank until a number from zero to greater than zero is entered in the system. A staff member does not automatically enter scheduled hours, but collects verification of each hour before manually populating the data entry field. The staff member maintains the documentation in the case file to support participation data.</p>
<p>4. Describe the methods of daily supervision that the state will use.</p>	<p>Workforce provider staff will communicate by telephone with each childcare provider regularly to provide structure and offer any assistance that might be helpful. Evidence of daily supervision for childcare services will be the telephone contact logs maintained by the case manager and the timesheets or attendance records signed by the participant in the community service program and the participant providing child care submitted to provider staff. Staff will record hours in the system and maintain the verification in the case file.</p>
<p>Special Documentation:</p> <p>NONE</p>	

II. Hours Engaged in Work

This section includes two topics: **excused absences** and **FLSA deeming**.

Excused Absences

Describe the state's excused absence policies for unpaid work activities. This includes its policies for holidays as well as the 10 additional excused absences that the State may count in a 12-month period. If the policies vary by work activity, the state should describe how they vary and for which activities.

- i. **Holiday policy for paid work activities**—Florida will grant participation hours for any holiday that an employer designates as a “paid holiday” for its employees.
- ii. **Holiday policy for unpaid work activities**—Florida will grant participation hours if the participant is scheduled on the following holidays observed by a work activity provider:
 1. **New Year's Day;**
 2. **Martin Luther King's Birthday (observed);**
 3. **Memorial Day;**
 4. **Independence Day (observed);**
 5. **Labor Day;**
 6. **Veteran's Day (observed);**
 7. **Thanksgiving**
 8. **Friday after Thanksgiving;**
 9. **Christmas Eve; and**
 10. **Christmas Day**
- iii. **Excused absence for paid activities**—Florida will grant participation credit for scheduled hours a participant misses due to illness or other good cause for which the individual was paid.

**NOTE: Final Regulations allow the conversion of excused absence days to hours.
Change: Effective October 1, 2008.**
- iv. **Excused absence for unpaid hours/activities**—Florida will allow the RWBs to excuse up to 80 hours per participant during **the preceding** 12-month period and attribute hours towards participation. Excused absences will be recorded and tracked in the automated system. However no more than 16 hours per month may be claimed.
- v. **Tracking excused absences and holidays in the system**—Currently, the automated system cannot record the dates hours are attributed for credit based on an excused absence or unpaid holiday; RWB staff must manually maintain and track the dates and hours using a tracking document in the case file. The document will record the dates of the excused holiday, the total number of absent hours per month (no greater than 16) and the total number of hourly absences **during the preceding 12 months** (no greater than 80). AWI will modify the workforce data entry system to track these dates. Prior to crediting participants with the hours, provider staff will verify the individual is scheduled to be in the activity.

FLSA Deeming

<p>If the state wishes to use the “deeming” provision permitted under 261.31 and 261.32 for work experience or community service programs, describe how the state determines the hours required, including how the monthly TANF grant and food stamp allotment are combined and divided by the minimum wage to meet the “core” participation requirement. Include a statement certifying that the state has adopted a food stamp workfare program and a limited or “mini” Simplified Food Stamp Program.</p>	<p>The State of Florida has been approved to conduct a mini Simplified Food Stamp Program. The RWB providers will calculate the required work experience or community service hours for the month by adding the amount of the cash assistance and the food stamp allotment and dividing the resulting figure by the higher of the Federal or State minimum wage. Additional hours will only be deemed after the individual participates for the maximum hours allowed under the FLSA, and the deeming applies only to core hours. The RWB provider staff members enter actual hours completed and verified into the system and maintain documentation in the case file.</p>
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III. Work-Eligible Individual

A “Work-Eligible Individual” means an adult or minor 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. A minor parent and not the head-of-household ;
- b. **A non-citizen** who is ineligible to receive assistance due to his or her immigration status; or
- c. At State option, on a case-by-case basis, a recipient of Supplemental Security Income (SSI) benefits.

The term also excludes: **(Applies to any parent)**

- a. A parent providing care for a disabled family member living in the home, provided that the need for such care is supported by medical documentation; and
- b. At State option on a case-by-case basis, a parent who is a recipient of Social Security Disability Insurance (SSDI) benefits; and
- c. An individual in a family receiving MOE-funded assistance under an approved Tribal TANF program, unless the state includes the Tribal family calculating work participation rates. (NA in Florida.)

<p>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. These are: (a) a minor parent who is not the head-of-household and not the spouse of the head-of-household, (b) an alien who is ineligible to receive assistance due to his or her immigration status, and (c) at state option, on a case-by-case basis, a recipient of Supplemental Security Income (SSI) benefits.</p> <p>NOTE: Final Regulations allow States to add SSDI recipients as exclusions from being work-eligible on a case-by-case basis.</p>	<p>The State of Florida, Department of Children and Families eligibility staff input data into the Department’s eligibility determination system, the Florida Online Recipient Integrated Data Access (FLORIDA). The system is programmed to identify all family members associated with the TANF eligible child. The system maintains an extensive database of household/family relationships and assigns a specific eligibility status code to each family member of the TANF family. Each month, data for all families receiving ongoing TANF assistance are extracted from the FLORIDA system into a data warehouse. The family case identifier is then used to identify all family members and caretaker relatives associated with the TANF eligible child. Whether or not an individual is designated as work-eligible can then be determined for all individuals associated with the TANF family by analysis of their age, relationship to the eligible child, marital/head-of-household status, family conditions or receipt of assistance. The following parents are excluded as work-eligible individuals and the method for identifying them is described as follows:</p> <ul style="list-style-type: none"> • Parents who are ineligible non-citizens—these will be identified and designated as exempt by virtue of a specific eligibility status code currently programmed in FLORIDA. • A minor parent that is not a head-of-household or is not married to a head-of-household—the payee of the benefits will be identified as the head-of-household. A teen parent who is not married to the payee will be determined as not work eligible. • SSI or SSDI recipient (on a case-by-case basis)—these individuals will be identified and designated as exempt by a specific
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<p>Change: Effective October 1, 2008.</p> <p>Describe the state's procedure for identifying a parent caring for a disabled family member, who may also be excluded from the definition of work-eligible individual. The procedure should define the terms "disabled," "family member," and "attending school full time." This should include a means of ensuring that the need of 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.</p> <p>NOTE: Final Regulations remove the limitation that the participant could not be removed from being work eligible if the disabled person was in school full time.</p> <p>Change: Effective October 1, 2008.</p>	<p>eligibility status code currently programmed in FLORIDA. This status will be confirmed by their receipt of SSI/SSDI benefits. Applicants for SSI/SSDI <u>are not</u> excluded.</p> <ul style="list-style-type: none"> • Parents caring for a disabled family member in their home—these individuals will be identified and designated as exempt by a specific work status code currently programmed in FLORIDA. <p>For purposes of participation rate reporting, the following ineligible parents with children receiving cash assistance will be reported as work eligible:</p> <ul style="list-style-type: none"> • Fleeing felons • Convicted drug felons • Intentional program violators • Second and third level noncompliance individuals with protective payees receiving benefits for children • Hardship extensions after reaching time limit if children are at risk of removal from home due to abuse or neglect <p>Definitions</p> <p>Disabled—for determining work-eligible status of an individual who is disabled, the term "disabled" is defined as a physical or mental illness, impairment or defect supported by medical evidence and expected to last longer than 30 days.</p> <p>For determining the work-eligible status of an individual who is "caring for a disabled family member living in the home," the disability must be severe enough to require the full-time presence of a caregiver. Both the disability and the need for care must be supported by a licensed physician's statement, which includes both a confirmation of a disability and a prognosis of its duration. A review of the disability and the need for full-time care will be conducted by the DCF, at a minimum, annually for anyone whose disability is expected to exceed more than one year. For anyone requiring care whose disability has an expected duration of less than one year, a review will be conducted at the end of the disability period as projected and noted in the physician's statement.</p> <p>Family member—For the purpose of "caring for a disabled family member" policy, a family member requiring care must be within the 5th degree of kinship through blood or marriage to the caregiver.</p> <p>Currently eligibility staff has to consult several FLORIDA screens to verify all factors that determine the work status of a person caring for a disabled family member. Until data fields can be added to the FLORIDA system to identify and place on one screen which disabled family household member is being cared for and to document the physician's statement and its date, staff will review ad hoc reports to assure that federal reports are correct.</p>
<p>2. 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:</p>	<p>a. Based upon the family characteristics entered by front line staff, the FLORIDA system automatically determines work participation (work-eligible) status by analyzing the age, relationship and marital status of family members, citizenship status, sanction status, time limit status and receipt of SSI/SSDI. FLORIDA identifies four mandatory (work-eligible) groups that must be referred either to the RWBs for work registration and work activity assignment or to the refugee service providers:</p>

<p>a. The correct reporting of the work participation status of all adult (or minor child head-of-household) family members, and</p> <p>b. 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.</p>	<ul style="list-style-type: none"> • Mandatory not head of household • Mandatory head of household • Mandatory SSI/SSDI pending • Mandatory Refugee <p>b. The FLORIDA system also automatically determines whether the family is to be included in the All-family and Two-parent work participation rates by the case and family member characteristics.</p>
<p>3. 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.</p>	<p>In the previous section describing each work activity, this plan includes detailed processes the RWBs use to ensure that career managers enter only countable and verified participation hours in the workforce data entry system, their automated tracking system. AWI program monitoring, desk reviews, frequent training, and WFI-monitored accountability reports assure that RWBs remain vigilant in maintaining the integrity of their data.</p> <p>The DCF extracts data directly from the workforce data entry system and stores it in the Department’s data warehouse. The data elements extracted are social security number, activity (service) codes, actual hours and week begin date.</p> <p>The stored programming procedures developed are able to:</p> <ul style="list-style-type: none"> Compile the work participation data items, Control for the rules and requirements that apply to the TANF work activities, Compute the average hours across all activities for the month, Perform edit checks and Control for internal consistency and completeness of the work participation data. <p>In addition, the Department uses an extensive system of data exchanges with various client information databases, including the National Directory of New Hires and state wages files, to identify employment so that DCF staff can document hours.</p>

IV. Internal Controls

The state is required to describe internal controls that ensure a consistent measurement of the work participation rates. The work verification plan should contain a clause confirming that the state will maintain all pertinent findings produced through its internal control processes and that these findings will be available for use by ACF and other auditors in their review of the state’s work participation verification system.

General: Even though Florida’s large caseload decline has generated sufficient caseload reduction credit for the state to meet and exceed the participation rate for the “all family” rate in previous years and the “two parent” rate has been not applicable, the state has always strived for outstanding performance supported by a meticulous system of data integrity and stringent accountability.

Upon passage of DRA, managers from the two TANF-implementing agencies recognized the criticality of developing a strategic plan to examine, look for weaknesses, revise and improve all aspects of program design, program operation, automated systems coding, participation verification and report generation methodology.

In late December 2005, Florida formed two TANF reauthorization workgroups made up of representatives from AWI, DCF and WFI.

1) The Legislative and Program Policy and Services group was charged with examining current program design, comparing it with the DRA provisions and recommending legislative and/or program design changes to Florida’s welfare transition program in order for it to conform to new federal guidelines.

2) The Data Quality and Validation group’s assignment was to delve into all data used to report work participation, sanctions, exemptions, etc. collected in either agency’s systems, track it to its source

and identify any deficiencies throughout the process. These two groups met separately and jointly throughout the winter and spring of 2006, reporting on findings and developing plans to address identified anomalies or deficiencies.

Each agency also had its on-going continuous program improvement process on high alert to prepare for implementation of the interim regulations resulting from DRA. The Workforce Florida Inc. staff monitored monthly and quarterly performance reports from RWBs and required corrective action on a regular basis. The Agency for Workforce Innovation conducted its annual on site and desk monitoring of RWB activities and followed up with a series of training conference calls throughout late spring and summer that described the new regulations, the findings of the monitoring visits and recommendations for correcting any gaps in performance or verification procedures.

The Department of Children and Families identifies its major performance measures and standards for each program office and tracks progress on a monthly basis. One of the performance measures assigned is the requirement to meet the 50% participation rate standard in the TANF program and the 90% participation rate for two parents.

As an addition to these performance improvement processes, the program office's Data Section created ad hoc reports of specific work participation and exemption codes. The reports are sent to the circuit/region personnel to validate their correctness or to correct any errors found. EXAMPLES: 1) A listing of all participants exempted due to caring for a disabled family member with a request to validate that a current doctor's statement is on file, that the family member is in the home, etc. If these conditions were not met, the case was to be converted back to mandatory (work-eligible). 2) A listing of two parent cases to validate that the parents have a mutual child, that the coding is correct if the family contains a disabled parent, etc. Circuit personnel correct the cases directly into the FLORIDA system participant case files.

From the findings of the performance measures reports and the ad hoc reviews, DCF developed and presented a statewide Train the Trainer session for its circuit/region personnel. Presented through Breeze, a web-based communication tool combining video and audio software, the session explained DRA and interim regulation provisions, areas of concern from the reviews and procedures for improved eligibility coding.

The program improvement activities of welfare transition agencies culminated in a joint two-day training session in September 2006 where DCF's eligibility staff and RWB workforce staff came together to hear results from monitoring/review activities, share ideas for improving results and plan for any modifications to programs or systems needed for the October implementation of DRA and the interim regulations.

Each DCF eligibility worker and each RWB career manager has a role in Florida's internal controls network. The attention to monitoring, supervisory review and training activities is directly related to assuring that the front line staff understand policies, procedures and the intricacies of correct coding in each agency's automated system. Information entered correctly at the source will result in accurate reports.

To maintain the momentum of program improvement activities, each month since October 1, personnel from AWI and DCF have independently continued their scrutiny of ad hoc data runs and draft reports for anomalies. Any anomalies are referred to the contributing agency for explanation or correction by front line staff.

All the activities described above are a preface to the more detailed internal controls in place in the agency data units that play a role in ensuring Florida's on-going diligence to the consistent measurement of the work participation rates.

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 would become a work-eligible individual once the family member is no longer disabled.

Workforce programmatic monitoring—a) Each year, AWI will conduct an on-site review of a sample of cases. On-site reviews examine performance, as well as other factors. On-site reviews are performed on a cyclical basis to ensure every RWB is monitored every other year, at a minimum. The on-site monitoring review elements include:

- Compliance with work activity definitions,
- Documentation of hours, and
- Verification of supervision requirements.

In each on-site monitoring visit, a random sample of cases is reviewed based on the total applicable cases in the workforce data entry system. The sample is determined by a 12 percent confidence interval and (no less than) an 80 percent confidence level.

b) The workforce program will develop, distribute and maintain on its agency web site the necessary guidance or policy regarding work activity definitions, work activity supervision requirements, data entry requirements, and verification/documentation requirements.

c) Workforce provides staff training once a year, minimally throughout the state. Workforce also provides technical assistance through a variety of methods: on-site visits, monitoring visits, performance improvement plan visits, conferences, conference calls, and on-line training (web based).

d) Workforce put forth legislative amendments to Florida Statute 445.024 to align Florida work activity definitions with the Federal Regulations; the bill passed in the spring session, and the Governor signed it into law.

DCF Controls—a) In addition to developing policy manuals, procedures guides and train-the-trainer materials which are available on the web site, the DCF also has several levels of quality management to insure that complete and accurate data are submitted to HHS.

b) **Quality Management System:** The Department restructured its Quality Assurance and Quality Control functions as a part of the on-going modernization of Florida's public assistance eligibility process for food stamps, cash assistance and Medicaid. The following describes the levels and functions of DCF's Quality Management System. The Office of Quality Management was implemented February 2007.

1. Quality Assurance (QA) Reviews at the Local Circuit/Region Level: Designated senior workers will sample three cases per week from each eligibility specialists' caseloads. In addition to checking for payment accuracy, reviewers check cash cases for accuracy of work referral and exemption codes. Reviewers participate in Accuracy Improvement Meetings held regularly where they share review results, look for error trends, plan for improvement, etc.

Findings are maintained in the on-line Quality Management System. This system also includes an on-line instructional guide for the reviewer's use in determining accuracy in the case.

2. Quality Assurance, Quality Control and Quality Improvement at the Region Level (QA, QC and QI): Under the management of the central program office, Region QA staffs will validate the accuracy of the local Circuit QA reviews to assure consistent and appropriate review work. In addition, QA staffs will review 35-70 cases per service center annually for overall accuracy. If the case has cash assistance in it, the reviewer will validate the accuracy of the work referral and exemption codes. Region QA personnel will

	<p>participate in case staffing and will coordinate corrective action activities.</p> <p>QC staff conducts a full field investigation of 1020 cases with food stamp assistance. In addition, QI staff conducts yearly Medicaid pilot projects as requested to meet regulatory requirements and any other requested and customized quality improvement projects deemed necessary by management. As part of the QC process, the review of cash assistance eligibility in cases will begin in June 2008. The state level QA office is also reviewing the quality and accuracy of cash assistance cases as part of the Management Evaluation (ME) Review process for each program office. Region QC personnel will participate in case staffing and coordinate corrective action activities.</p> <p>3. <u>Quality Management at the State Level:</u> The Quality Management Office at this level monitors and manages all QC and QA work throughout the state; analyzes data generated as a result of other review levels; looks for trends that should be brought to the Department Administrative Team; identifies, validates and shares performance excellence; and coordinates, develops and maintains State corrective action plans.</p> <p>Each level of the Quality Management System contributes to the overall quality and accuracy of the data used to develop federal reports.</p>
<p>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 by examining the documentation used to support those hours.</p>	<p>Prior to submitting the TANF Data Reports, the DCF Data Unit staff will examine the data for inconsistencies including an examination of hours reported. Staff will run data queries to identify any work eligible individuals whose reported average weekly hours of participation are unusually high (more than 70 hours per week), will compile a list and refer it back to AWI for further documentation from field service provider staff.</p>
<p>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 in to 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 results that what the state actually reported to HHS.</p>	<p>The TANF Data Report is produced using Microsoft SQL from a Data Warehouse. The Data Warehouse contains data extracted weekly, monthly and quarterly from FLORIDA and the workforce data entry system. Data files are also received from Child Support Enforcement for child support payments and the Partnership for School Readiness for subsidized child care. These files are imported into tables in the Data Warehouse. The following tables are built to house the data: Family, Adult and Child and Service Activity. These tables contain information on all TANF families reported on the TANF Data reports. Programming has been developed and will be refined to produce the data reports from these files. Because of the programming specifications for DCF's automated process, many data entry, computational and compilation errors will be avoided.</p> <p>All programming used to build the TANF Data Report will undergo vigorous and thorough testing. The testing will include manual checks to the data posted against the source data from the workforce data entry system, FLORIDA and Child Support Enforcement records to ensure that all report items are internally consistent.</p> <p>In addition, the state will query some 20 data elements for consistency including family counts, person counts, number of families receiving subsidized child care, number of families receiving food stamps and the average benefit amount, summary of TANF benefits, family affiliation codes, and counts of work participation statuses. The data from these queries will be compared to the data</p>

	<p>from a previous report month and any count not within a +/- 5 percent of the previous month's counts will be evaluated for inconsistencies. The files will also undergo the established federal edit checks and any discrepancies will be resolved prior to submission.</p>
<p>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.</p>	<p>To ensure submission of a complete and accurate TANF Data Report, a random sampling of family and person data will be obtained to verify manually that selected data elements have been populated correctly. This sample is further discussed in next section.</p>

V. Verification of Other Data Used in Calculating the Work Participation Rates-under the “complete and accurate” standard for data reporting, states should validate all data submitted in its TANF Data Report and, if applicable, the SSP-MOE Data Report.

The Work Verification Plan should contain the procedures needed to establish that the state has the capacity to break out the 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 childcare, age of child, age of adult or teen parent, number of months under a sanction, adult or teen parent with satisfactory attendance, and families with a disabled family member (adult or child).

<p>1. For each element listed below, describe the state’s data validation procedures to ensure “complete and accurate” data reporting.</p> <ul style="list-style-type: none"> a. Reporting Month b. Stratum c. Case Number d. Disposition e. Type of family for work participation f. Amount of Food Stamps Assistance g. Receives subsidized childcare h. Amounts of TANF (and SSP-MOE) assistance i. Family affiliation code j. Non-custodial parent indicator k. Date of birth (adult) l. Relationship to head of household m. Parent with minor child n. Work-eligible individual indicator o. Date of birth (child) 	<p>As previously stated, the DCF program office’s Data Section will compile the TANF Data Report electronically. A sample of families for each report month will be pulled and their data will be manually compared to the original sources of data. Also any fields that were automatically calculated, such as average hours per week, will be verified. Since the Department will be using a tested program to compile the reports, the sample size of 27 (10% of 275) will be at a 95% confidence level with an 18% confidence interval.</p>																				
	<p>Data elements to easily identify case characteristics will be a part of a family’s or individual’s monthly record. The files currently contain the following fields: amount of subsidized child care, age of youngest child, family type, teen parent indicator, sanction availability. The following data element will be added and populated when applicable: personal identifier of the disabled family member.</p> <p>The following chart describes the data element, the original source of the data and how the data will be validated.</p>																				
<table border="1"> <thead> <tr> <th data-bbox="940 824 1411 857">Data Element</th> <th data-bbox="1411 824 1787 857">Source</th> <th data-bbox="1787 824 2419 857">How Validated</th> </tr> </thead> <tbody> <tr> <td data-bbox="940 857 1411 889">Report Month</td> <td data-bbox="1411 857 1787 889">Automatically populated</td> <td data-bbox="1787 857 2419 889">Report Month Sample of cases</td> </tr> <tr> <td data-bbox="940 889 1411 922">Stratum</td> <td data-bbox="1411 889 1787 922">Florida does not use</td> <td data-bbox="1787 889 2419 922">NA</td> </tr> <tr> <td data-bbox="940 922 1411 1109">Case Number</td> <td data-bbox="1411 922 1787 1109">FLORIDA assigns a unique case number, category and sequence for each family assistance group. The federal case number is built using these data elements.</td> <td data-bbox="1787 922 2419 1109">Report Month Sample of cases</td> </tr> <tr> <td data-bbox="940 1109 1411 1198">Disposition</td> <td data-bbox="1411 1109 1787 1198">Automatically populated if family does not receive any benefits</td> <td data-bbox="1787 1109 2419 1198">Report Month Sample of cases</td> </tr> <tr> <td data-bbox="940 1198 1411 1417">Family Type</td> <td data-bbox="1411 1198 1787 1417">Relationships between family members are documented and entered into the FLORIDA system. From these relationships, family type is then determined using programming logic.</td> <td data-bbox="1787 1198 2419 1417">Report Month Sample of cases</td> </tr> <tr> <td data-bbox="940 1417 1411 1445">Amount of Food Stamp Assistance</td> <td data-bbox="1411 1417 1787 1445">Individuals are matched by</td> <td data-bbox="1787 1417 2419 1445">Report Month Sample of cases</td> </tr> </tbody> </table>	Data Element	Source	How Validated	Report Month	Automatically populated	Report Month Sample of cases	Stratum	Florida does not use	NA	Case Number	FLORIDA assigns a unique case number, category and sequence for each family assistance group. The federal case number is built using these data elements.	Report Month Sample of cases	Disposition	Automatically populated if family does not receive any benefits	Report Month Sample of cases	Family Type	Relationships between family members are documented and entered into the FLORIDA system. From these relationships, family type is then determined using programming logic.	Report Month Sample of cases	Amount of Food Stamp Assistance	Individuals are matched by	Report Month Sample of cases
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		their unique personal identifier assigned by the FLORIDA system against eligible food stamp recipients and their pro rata share of benefits is calculated. Food stamp benefits are then summed to the family level.	
	Subsidized Child Care	Populated by matching SSN of Child against files received from outside source.	Report Month Sample and record counts
	TANF Assistance	FLORIDA extracts. Foster care board payments--populated from files received from outside source	Report Month Sample of cases and record counts
	Non-Custodial Parent Indicator	Florida does not provide assistance to Non-Custodial parents	NA
	Date of Birth (Adults)	Dates of birth are documented and entered into the FLORIDA system. These dates of birth are further verified through social security data validation.	Monitoring of case files and Report Month Sample of cases
	Relationship To Head of Household	Relationships between family members are documented and entered into the FLORIDA system.	Monitoring of case files and Report Month Sample of cases
	Parent With Minor Child	FLORIDA data extracts and analysis of relationships.	Monitoring of case files and Report Month Sample of cases
	Work Eligible Indicator	FLORIDA data extracts and analysis of marital status and date of births.	Report Month Sample of cases
	Date of Birth (Child)	FLORIDA data extract	Monitoring of case files and Report Month Sample of cases
2. Describe any procedures employed to eliminate data inconsistencies between two or more data elements.	The DCF will electronically compile TANF Data Reports. Most data inconsistencies are avoided by using tested programmatic logic. We conduct continuous evaluations to determine the need for additional programming edits. A series of ad hocs will be run against the data to identify any inconsistencies.		

Work Participation Status

<p>1. Describe the state's procedures for ensuring that a family is not disregarded from the work participation rate for more than 12 months per lifetime based on a single custodial parent with a child less than one year.</p>	<p>DCF will maintain a file of all work eligible individuals who have been disregarded from work participation due to being a single custodial parent with a child less than one year old. The file will contain their unique personal identifier and family case number as well as the report month that they were disregarded. Prior to disregarding a person for this reason, the file will be referenced to ensure that this family has not been disregarded for more than 12 months.</p>
<p>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 refusal to participate in work.</p>	<p>DCF will maintain a file of work eligible individuals who were disregarded from work participation due to refusal to participate in work activities. The file will contain the unique personal identifier and family case number as well as the report month that the disregard was used. Before disregarding a family for refusal to participate in work activities, this file will be referenced to ensure that the family has not been disregarded for more than three months in a 12-month period.</p>
<p>3. Describe the state's 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 the age of six.</p>	<p>Before an individual is coded as engaged in work activities when they are participating at the 20 hours but fewer than 30 hours level, the DCF will analyze the age of the youngest child to ensure that the youngest child is younger than six years old. The family composition will also be analyzed to determine that the family contains a single custodial parent or caretaker relative.</p>

This is to certify that the Florida REVISED TANF Work Verification Plan dated August 30, 2008 includes all the information required by the regulations at 45 CFR 261.62(b) and accurately reflects the provisions under which the State will be operating as of October 1, 2008.

Florida's two partner agencies in administering the eligibility determination and work activities requirements of TANF confirm that each agency will maintain all pertinent findings produced through their internal control processes and that these findings will be available for use by ACF and other auditors in their review of the state's work participation verification system.

**Jennifer Lange
Program Director
ACCESS Florida**