

**October 2, 2008**

**TOPIC: JPR screen** - As of October 1, 2008, the participation requirements have been simplified.

On the Job Participation Rate (JPR) conference call, the RWBs asked about the minimum number of hours a Welfare Transition (WT) participant is required to be engaged to meet participation requirements since the JPR screen will reflect a true month.

As of October 1, 2008, the participation requirements have been simplified. The minimum number of hours the family must complete and document according to the approved Work Verification Plan to be included in the participation rate(s) numerator(s) are provided below:

**All family participation rate** – for the family to be included in the numerator of the all-family participation rate,

- At least one work-eligible parent must complete at least 129 hours in a combination of countable work activities. At least 86 hours in the month must be in a core or combination of core activities
- UNLESS
  - the family is a single parent family with a child under the age of six. The family will be included in the numerator of the all-family participation rate if the work-eligible parent completes at least 86 hours in a core or combination of core activities during the month.
  - the family is a single parent family with a teen parent head of household that does not have a high school diploma or a GED. The single parent will be included in the numerator if (s)he participates satisfactorily in a secondary program or 86 hours in education directly related to employment during the month.
  - the family is a two-parent family with two teen heads of households that do not have a high school diploma or equivalency. The parents will be included in the numerator if the parents attend 86 hours per month in either education directly related to employment or in a secondary educational program.

**Two-parent family participation rate** – if the family has two work-eligible parents, the family will be included in the denominator of the two-parent participation rate in addition to the all-family participation rate. *This does not include a two-parent family where one of the parents has a documented limitation to participation that will last greater than 30 days and the documentation is indicated in the Department of Children and Families data entry system or the One-Stop Service Tracking (OSST) system.* The indicators in OSST are

- Medical Deferral – Greater than 90 days; and
- Alcohol, Drug, Mental Health Deferral – Greater than 90 days.

The family will be included in the numerator as “participating” if the family complies for the minimum number of required hours based on the receipt of childcare and teen parent status. Hours of participation recorded for the two parents are combined for credit towards the two-parent participation rate.

- If the two-parent family receives subsidized childcare, the family must comply in at least 236.5 (or 237) hours per month combined (shared between the parents) in countable work activities. At least 215 hours must be in a core or combination of core activities.
- If the two-parent family does not receive subsidized childcare, the family must comply in at least 150.5 (or 151) hours per month combined (shared between parents) in countable work activities. At least 129 hours must be in a core or combination of core activities.
- If the two-parent family is made up of teen head of households (no high school diploma or GED), the family is considered complying if **each** parent (regardless of the receipt of childcare) participates in at least 86 hours per month in education directly related to employment or in a secondary education program.

Remember, two-parent families are included in the all-family participation rate as individuals. So, at least one of the parents must meet the minimum work participation requirements for the all-family rate.

## **Frequently Asked Questions**

**Question:** What activities can we deem up to the core number of hours if the customer does not complete the core number of hours to meet participation rate requirements?

**Answer:** Federal law only allows the State to deem for hours reported under two work activity categories: work experience and community service. Deeming was created to encourage states to utilize the worksite activities. However, parents engaged in the work program cannot be engaged more than the calculated hours. The maximum numbers of hours the engaged parents can be assigned at a worksite are calculated by adding the cash assistance amount and the food stamp allotment and dividing that amount by the highest (State of federal) minimum wage. Essentially, the family is “working” off their benefits. The United States Department of Health and Human

Services (HHS) realized that several states have low benefits. Many parents engaged in worksite activities will not complete their core hours if engaged in a worksite activity. So, the federal regulations provided the states the ability to deem up to the core number of hours for the family if the family completes the calculated number of hours in a worksite activity.

**Question:** If both parents are assigned to a worksite activity (work experience or community service), how do we determine the maximum number of hours that must be assigned to each parent?

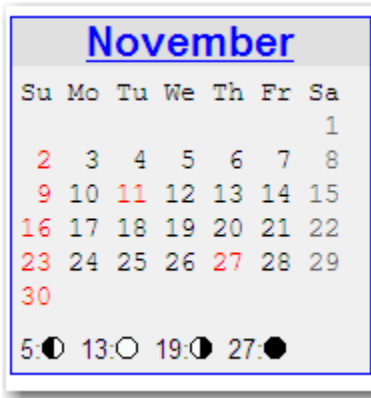
**Answer:** food stamps and cash assistance are provided to the family. Program staff calculate the maximum number of hours that **the family** may be assigned to complete at a worksite activity. The parents may share the calculated hours. One parent may complete all of the hours, as long as no individual is required to complete more than 40 hours per week. The parents (combined) cannot be required to complete more than the number of hours calculated using cash assistance and food stamps divided by the higher of the State or federal minimum wage.

**Example:** Sammy and Sally are a two-parent family. Both are engaged in the Welfare Transition program.

- Sally is getting her degree at the University and is actually in classes and labs for only 12 hours a week (full-time based on the school's standards). She is getting her degree in counseling, which is required by local employers to be hired as a family counselor.
- Sammy does not have a diploma or equivalency, but is interested in attaining his General Equivalency Diploma (GED).

After completing the initial assessment, program staff determine that a worksite activity would be beneficial for both parents. Sally will start a work experience activity with an employer since she has skills directly related to her career choice, work experience and an employer in the community is ready to begin training interested job seekers. Sammy is not sure what about his future career. Additionally, Sammy does not have recent work experience, so gaining basic employability skills would also be appropriate. As Sammy is completing career assessments and entering an education program, Sammy will start a community service site.

Program staff determine that the parents are not to be assigned to more than 134 hours at a worksite activity during the month [ $(\$303 + \$609) / \$6.79$ ]. This example is based on a full month, November 2008. Looking at November's calendar, we decide that the participant's should start their worksite activities on November 3, 2008 since they will be interviewing and setting up their schedule on October 24, 2008.



- Sally will complete 20 hours a week at the worksite (which will give us the core requirement for the all-family rate). Additionally, she will be assigned to an educational activity/training to encourage her to complete her degree at the University, which will be coded as Job Skills Training. Because she is in class for 12 hours a week, she will be assigned to complete 12 hours per week on her Individual Responsibility Plan (IRP), but she will be encouraged to record her study hours on a time sheet provided by staff.
- Sammy will complete 13 hours per week for two weeks and 14 hours per week for two weeks at a worksite in addition to his education program. Sammy will also be enrolled in a GED program for 16 hours per week.

If the family completes all of their worksite hours, this will bring the family's worksite total to 134 hours. Program staff will record the actual hours completed.

- Sally may receive credit under "Work Experience" for her actual hours completed. She may receive credit under the category "Job Skills Training" for each documented hours in class. She may receive credit for unsupervised study time, but she may not receive more than one hour of credit for unsupervised study time for each hours spent in class. She may also receive credit for supervised study time if she documents time she spends in a lab or at a study hall.
- Sammy may receive credit under "Community Service" for his actual hours completed. He may also receive credit for participating in a secondary education program. He may receive credit for each documented hours in class. He may receive credit for unsupervised study time, but he may not receive more than one hour of credit for unsupervised study time for each hours spent in class. He may also receive credit for supervised study time if he documents time he spends in a lab or at a study hall.

**Question:** how do we know how many hours to assign in a worksite activity (work experience or community service) if the family has to complete the minimum required hours in a core but the calculation is below the core requirement?

**Answer:** the Interim Final Rule provided the states the ability to deem the number of hours the family completes in a worksite activity up to the core if the family completes the calculated number of hours and the calculation was less than the core requirement

for the rate being compiled. The process for assigning the number of hours for a full month of participation is provided below.

1. The single parent family is attending an appointment at the end of October 2008 to establish a schedule for November 2008. Because the participant needs work experience and training directly related to his/her goal, the participant is being assigned to a community service worksite and education directly related to employment. It is important to note the participant does not have a high school diploma or an equivalency and one is required to reach his/her goals; this is the reason why the program staff can assign education directly related to employment as an activity and receive credit for hours completed.
2. The program staff calculates the maximum number of hours the participant may be assigned to a worksite in November 2008 by adding the cash assistance allotment amount for November 2008 and food stamp allotment amount for November 2008 (\$161 and \$202). This amount is divided by the highest of the minimum wage (\$6.79 as of October 2008). The maximum number of hours the participant may be assigned to a worksite activity for the month of November 2008 is 53.46 hours or 53 hours (using mathematical principles for rounding to whole numbers). The parent's youngest child is 8, so the parent must complete at least 86 hours in a core. **However, the parent cannot be required to complete more than 53 hours at a worksite activity during November 2008 based on the calculation.**

The maximum number of hours the family can be assigned at a worksite activity during the month is calculated using a new feature in OSST.

Cash Assistance Amount for the Month	\$ 161
Food Stamp Amount for the Month	\$ 202
Enter the Higher of the Federal/State Minimum Wage (Current State Minimum Wage = \$6.79)	\$ 6.79
The maximum number of monthly hours the participant may be assigned to a worksite (rounded) :	24
<a href="#">Save ?</a> <a href="#">Cancel ?</a>	

This must be completed before program staff can enter hours of participation on the JPR screen.

Start Date	Schd Hrs/wk	Max Worksite Hours for Month	Actual Completed Hours	Holiday Hours	Excused Hours	Total Hrs Completed
06/06/2008	5		0	0	0	0
06/10/2008	29	53	0	0	0	0
	34	53	0	0	0	0

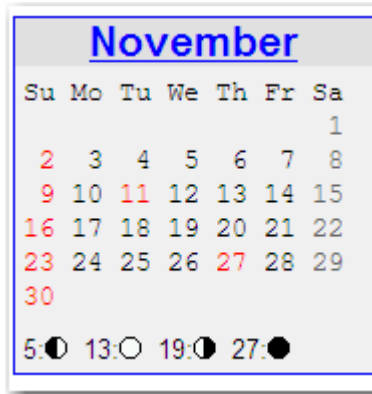
The maximum number of hours the family can be assigned at a worksite will be recorded on the summary screen, and it must be updated each month.

- If the parent completes all 53 hours during the month of November, then the Department of Children and Families (DCF) will report 86 hours based on the deeming provision in federal law.
- The program staff must record the Actual Completed Hours (ACH) in the data entry system. Excused Absence hours and Holiday hours may also be included in the total, but they are entered in blocks identified with a title representing each element. These are totaled and reported to the United States Department of Health and Human Services (HHS).
- The program staff **DOES NOT** deem up to the core by entering more hours than actually completed in the ACH box. If the family completes the calculated hours (and the calculated hours are less than the core), the hours will be deemed on behalf of the region. An example of the data entry boxes on the data entry screen are provided below.

MON			TUE			WED			THU			FRI			SAT			SUN			WEEKLY	WEEKLY TOTAL		
ACH	Hol	Exc	ACH	Hol	Exc	ACH	Hol	Exc	ACH	Hol	Exc	ACH	Hol	Exc	ACH	Hol	Exc	ACH	Hol	Exc	ACH	ACH	Hol	Exc
1 Holiday			2			3			4			5			6			7			Week 1			
8			9			10			11			12			13			14			Week 2			
15			16			17			18			19			20			21			Week 3			
22			23			24			25			26			27			28			Week 4			
29			30																		Week 5			
<p>You may enter Actual Completed Hours (ACH) in Daily, Weekly, or in Monthly ACH cells.            Holiday &amp; Excused Absence hours are allowed for WT activities only, and in Daily cells. If entered, these should be whole numbers greater than zero.</p>																			MONTHLY ACH	MONTHLY TOTAL				
																				ACH	Hol	Exc		
																				0	0	0		

Save ? Cancel ?

- How many hours does this parent have to complete in a worksite activity each week? In this example, the parent cannot be asked to complete more than 53 hours total during the month. Also, we noted the parent needed both work experience to build employability and job skills, but the parent also needs a high school diploma or an equivalency to secure the job wanted. The calendar for November 2008 is below.



The participant may not start the worksite activity until the 3<sup>rd</sup>. Based on what education is available for adults without a secondary education diploma, the participant will be assigned to four full weeks of worksite and educational activities. The parent is assigned to a worksite for 13.25 hours per week (53 divided by 4) or 13 hours for the first three weeks and 14 hours the final week. In addition to the worksite activity, the participant is assigned to 15 hours in a secondary program.

If the participant complies with all of his/her hours,

- I will record 53 hours in a worksite and
- 60 hours in school coded as education directly related to employment.

Once the DCF pulls the hours, the RWB will receive credit for 86 hours in a core, 60 hours in a core plus and 146 total. This far exceeds the 86 core requirement and 129 total participation requirement.

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