During the period July 14-17, 2008, Agency for Workforce Innovation (AWI) staff members, Erica Mott and Mary Rankin, visited RWB 11 to offer technical assistance regarding WT program processes. The following is a synopsis of the technical assistance provided to RWB 11 staff during the visit.

- RWB staff provided information about each career center, as well as where WT program services are being offered.

**Previous Work Registration process:** RWB staff indicated that the former work registration process was not meeting the requirements as defined in Florida Statutes s. 414.095. The local work registration process only required Career Center staff to sign the work registration form after the applicant reported to the Career Center. The applicant was not provided an overview of the program or engaged in a countable work activity as required in 414.095, F.S.

**Revised Work Registration process:** The RWB staff provided information on their new revised work registration process that now includes:

- An overview of the WT program;
- The completion of assessments, including the Career Scope and Barriers to Employment Success Inventory (BESI);
- Work readiness workshops; Etc.

After the program participant completes the program overview and required assessments and workshops, an email message is sent to DCF notifying them that the work registration process has been completed. The individual is also provided a follow-up appointment to meet with program staff.

**Comments and Recommendations:**

- It was not clear that all service providers are being required to register applicants in the data entry system, the One-Stop Service Tracking (OSST) system. Program staff are not consistently entering supportive services in the OSST system, which is required. All Temporary Assistance for Needy Family (TANF) funded activities/services and WT program engagement must be recorded in the OSST system. This information is used to compile information for State and federal reports. The number of individuals served is provided to both the State and federal government. The RWB should indicate in the Local Operating Procedures (LOP) who
must enter data in the OSST system related to work registration activities and services.

- Documentation supporting the completion or failure to complete the work registration process should be retained in the case file. This includes a copy of the work registration form, signed Opportunities and Obligations Acknowledgement Form, etc. The LOP should clearly outline the documentation that must be retained in the case file.
- The RWB staff should outline the assessments the RWB will use to meet the federal “initial assessment” requirement outlined in 45 CFR 261.11. An assessment of the individual’s work history, skills and employability must be completed within 30 days of becoming eligible for cash assistance. This can be completed during the work registration process; however, the assessment should be reviewed once the individual becomes “mandatory” for engagement.
  - The RWB may develop and use an initial assessment form. If the RWB wants the initial assessment form completed during the work registration process, this should be clearly outlined in the LOP.
  - If the Career Scope and BESI is a required component of the initial assessment process, this should be clearly outlined and staff should be trained to ensure these assessments are administered timely.

Work Activities: The team discussed work activities in great detail.

- AWI staff are concerned that program supervisors and program staff are not clear on how to assign work activities in a manner that will assist both the program participant and help the program meet its performance requirements. Additionally, it appeared that the WT program staff may not have adequate resources or know the different activities available for program participants.
  - Program staff were not sure how to assign appropriately participants to activities. Program staff should be provided detailed technical assistance. We recommend reviewing cases on a regular basis to ensure program participants are assigned to a combination of activities that support program participation and goal achievement. The combination of activities should also be focused on meeting the federal requirements so the RWB may improve its performance.
  - Program staff should be provided information related to work activities available in the community.
    - For example, a list of education and training providers could be created and given to career specialists. The list may include information on the institution’s referral process, as
well as a contact list. Each career specialist should also have information about “work study” programs offered at colleges and universities in the area. Any student enrolled in a college or university who is not employed should be informed of the work study program.

- The team discussed assigning participants to work sites. The team talked about using community service sites for participants that have limited or no work experience. Once a participant successfully attends the activity for a designated time period, the participant should move to a work experience site that is relevant to the participant’s goals. Program staff are currently referring participants to a worksite via the following steps:
  - The participant is assigned to a worksite liaison;
  - Work site liaison updates case manager as to how the participant is doing at the work site;
  - The participant is referred to a worksite;
  - The participant is required to turn in time sheets each week; and
  - The participant is scheduled to return and meet with the program staff for follow-up.

- The RWB has established an on-line survey for worksite supervisors to provide direct feedback about the success of the worksite. This is a promising practice. However, participants assigned to worksites are not successfully completing hours or are not meeting the hours required to bring the RWB’s performance up to standards. Therefore, we have made the following recommendations:

  1. The worksite liaison should contact the worksite supervisor on a regular basis to try and resolve any problems;
  2. The participant should be assigned to a worksite directly related to the participant’s goals. If the participant is completing hours in a community service site to build basic employability skills prior to assignment with an employer related to the participant’s goals,
     - The community service referral should be short-term.
     - The program participant should be provided clear employability skill goals to meet so they can be assigned successfully to a work experience site related to their goals.
     - The program staff should follow-up with the program participant to move them to an employment related worksite.
  3. The participant should be provided a follow-up appointment to meet with their career specialist after they start their work site activity to
ensure the activity is successful and documentation of hours participated is collected;

4. The participant should be required to turn in hours of participation each week;

5. The career specialist should enter the due dates for turning in participation hours on their calendar. If the participant does not attend their appointment and/or not turn in documentation to support hours of participation, the counseling process should be initiated.

The program staff should be provided detailed training on how to code activities in the system. We recommend program managers pull cases that were enrolled in a worksite activity such as work experience or community service for the past quarter and review the hours entered on the Job Participation Rate (JPR) screen. The hours entered on the JPR screen should reflect the federal provision called deeming provided to the states by the United States Department of Health and Human Services (HHS). Deeming is the process which allows program participants assigned to worksite activities that are covered the Fair Labor Standards Act (FLSA) to be deemed additional hours needed to meet core requirements. If the program participant’s hours calculated using the applicable formula are less than the core required to meet participation requirements, the hours should have been deemed to the core. We recommend reviewing the information to ensure that correct hours were entered. Staff should be provided technical assistance about how to assign worksite activity hours, calculate the worksite hours, and enter the actual hours completed.

6. Because the JPR screen is being updated, the RWB may decide to have the career specialists enter the actual hours completed on the JPR screen each time documentation is submitted.

7. The RWB may elect to have only one staff member review all hours completed and enter the deemed hours at the end of the month.

8. The RWB should review case files to ensure that hours are assigned correctly based on the calculation required by federal law. The RWB also should review the case files to ensure the hours are verified by an authorized supervisor’s signature.

Support Services and Incentives: The RWB has implemented a program to increase job retention by using incentives. Additionally, RWB staff are hoping that by providing incentives, program participants will be more likely to submit documentation of hours completed. Currently the RWB is:

- Providing a $50 gift certificate for turning in pay information; and
• Providing $250 to the participant if they retain a job for 30 days or more.

Comments and Recommendations:

The RWB should audit cases to ensure
• Program participants given incentives are eligible;
• That incentives are recorded in the OSST system; and
• That incentives are provided according to the established LOP.

Medical Deferrals: It appears that the RWB staff are entering medical deferrals with a Begin Date prior to receiving documentation from a physician licensed under Florida Statute Chapters 458 or 459, as required by 414.065 (F.S.), Florida Administrative Code and guidance. The RWB staff must:

• Secure documentation outlining
  o The nature of the disability or incapacity;
  o The duration of the disability or incapacity;
  o The number of hours per week the individual can participate in activities; and
  o The percentage of the individual's disability and any other limitations on participation in work activities.

• Enter the deferral in the OSST system on the Alternative Plan screen;

• Engage participants referred to the WT program that meet an exception to non-compliance as defined in Florida Statutes ss. 414.065(4) based on their medical ability to comply; and

• Follow-up with the program participant based on their signed plan.

The program participant may be required to complete vocational assessments. If the individual submits a document from a physician licensed under Florida Statutes Chapter 458 or 459 that indicates that the participant cannot work or engage in countable work activities full-time but does not include all of the required information, the participant may be required to submit additional information required by the Florida Administrative Code. The deferral may be entered in the system because an initial document has been received. More information on the documentation that is required, as well as the process for entering data in the OSST system may be located in the guidance provided on the AWI website.
Childcare: The RWB staff stated that childcare was a significant issue and was delaying participation in work activities for applicants and mandatory participants. The RWB staff stated childcare is not being offered to school age children over the age of eight.

Comments and Recommendations: The AWI staff encourages the RWB to continue working with the local Early Learning Coalitions (ELC’s) to resolve the issue. Other recommendations include:

- The RWB may work with different agencies that offer family oriented “activities”, or offer on-site childcare.

Training: The AWI/WT program staff team discussed work registration, initial assessment processes, engagement in work activities, work activity definitions, etc.

- RWB program staff/managers were provided detailed information related to the participation rate. Program managers were provided step-by-step instructions on pulling reports in OSST, as well as outlining trends in the data.

- RWB program staff/managers discussed work activity definitions in detail. Because AWI staff noted a problem with participant engagement, AWI staff introduced “participation tracks.” An example of a participation track is provided at the end of this document.

- AWI staff reviewed participant cases with front-line staff, program managers and RWB staff. The AWI staff provided information about assigning work activities and reviewed Florida’s Work Verification Plan. The AWI staff discussed:
  - Work activity requirements for the varying family types. This included assigning activities to program participants, core and core plus requirements.
  - The process of entering activities in the OSST system correctly;
  - Assigning appropriate activities to customers;
  - Ideas related to time management. It appears that staff will be using Microsoft Outlook to manage appointments. Staff reviewed ways to use the calendar to mange cases and tasks.

The WT program is complex. Program staff will need on-going intensive training to learn the program rules and requirements, therefore, program managers should be prepared to offer technical assistance.
Ideas related to “participation tracks” were discussed. Below is an example of one “participation track.” The participation tracks must be established locally. They should be clearly outlined for front-line staff. Participation tracks should engage the program participant based on his skills, work history, abilities and goals. Participation Tracks should represent a progression towards employment. The tracks use the right combination of countable work activities to meet participation requirements and improve performance.

- **Track one:**
- If the program participant
  - Does not have a high school diploma or a General Equivalency Diploma (GED)
  - Is not “work ready”/does not have a good work history based on local criteria:
    - Example, has not worked at least six consecutive months in the past year, has not worked for at least 12 consecutive months in the past three years, has been recently let go from work due to an employability issue, etc. *(the RWB will have to determine what criteria meets the definition of “good work history”).*
- The participant needs to develop employability skills to get and keep a job.

**Activity 1-CORE:** The participant is engaged in a community service worksite to start developing employability skills.

a. The participant is given clear benchmarks for the community service worksite. For example:
   i. Show up on time every day you are scheduled.
   ii. Dress appropriately based on the employer’s requirements.
   iii. If you are going to be absent, call your supervisor in advance and your career specialist immediately.

b. If the participant is not sure what their employment goal is, the participant is also assigned to take career assessments to define those goals.

c. Based on his/her career goals, the participant is moved towards a work experience site with an employer that can teach the individual skills related to their career goal.
   i. The participant should be engaged in deciding their new employer and position. The participant should review and agree to their job description.
   ii. The participant should be given an interview date and time.
   iii. The participant should start with the new employer by a specified deadline. Being phased into an employment experience directly related to his or her goals may encourage program participation.

Assigning the worksite: program participants may not be assigned to more hours in a worksite than calculated using cash and food stamps. The calculation for the maximum number of hours the participant may be assigned to during the month in question is "cash + food stamps / the higher of the minimum wage."

- If the calculation is greater than the core, the participant may be assigned less than the calculated amount so (s)he can go to school, depending on his/her goals.
- If the calculation is less than the core, the family must be assigned to all of the calculated hours. This way, the region may receive credit for all of the core hours (if the family completes the calculated hours during the month).

**Activity 2-CORE PLUS:** Because the participant does not have a high school diploma or a GED, the participant is engaged in a secondary education program to build the participant's basic skills (and begin working towards a diploma). This is in addition to the worksite hours.

a. The participant is engaged in basic skills based on his/her assessment scores.

b. The participant is assessed to determine if they will need certification to obtain the job identified as an employment goal.