

## Recommendations

The DCF and AWI have been reviewing sample cases from the 2006-2007 FFY and October–November 2007 for engagement, employment, and hours of participation. The DCF and AWI have been studying these cases for trends. The trends and other information are provided below:

- The reviewer could not determine that the countable work activity met federal and State definitions for some cases based on case notes or information on the Skill Development screen.
- The reviewer could not determine the number of hours the participant was assigned to complete for a particular month at a worksite based on the case notes.
- Some JPR entries were changed from hours greater than zero to zero after the quarterly file was submitted to HHS.
- Many cases were closed in OSST prior to the end of the last month of cash assistance receipt inappropriately. Hours of participation were not captured for many participants that were engaged in countable work activities, including employment.
- In some areas, a large percentage of cases with employment entered in OSST had no hours of participation recorded for the report month.
- A large percentage of cases coded as “refugee” had no countable work activity entered in OSST or hours of participation for the report month.

The following recommendations have been made to assist the RWBs with meeting internal control requirements, securing hours of participation and securing hours of employment.

### 1. Basic Requirements

- The RWB must develop a local operating procedure or include in the local plan what workshops, training, and other forms of engagement constitute each countable work activity category. The WT program staff should describe the work activity assigned in the case notes to demonstrate the engagement meets federal and State definitions.
- An Actual Start Date must not be entered on a countable work activity until the participant **actually starts** attending the activity. For example, the participant may be assigned to start a job search and job readiness program on January 14, 2008. The WT program staff member enters the job search and job readiness activity (code 120) on the OSST Skill Development screen with an Anticipated Start Date of January 14, 2008. The WT program staff member calls the instructor to ensure the participant attended the first day of class, or the instructor emails an attendance roster to all program staff identifying participants who started the program on the 14<sup>th</sup>. The WT program staff member enters an Actual Start Date of January 14, 2008 after confirmation the participant started the activity. This process removes the ability to enter hours inappropriately on the JPR screen if the participant does not start the countable work activity. If a local operating procedure is established, staff members will identify noncompliance (not starting the countable work activity) quickly.
- Hours must not be entered on the JPR screen until
  - A document is received; and
  - The document is reviewed for a signature (the designated party authorized to verify hours of participation) unless the document is a pay stub or other form of approved documentation from an employer.
- Hours greater than zero entered on the JPR screen must not change after the hours are compiled for the federal file to HHS (40 days after the end of the quarter) unless good cause exists, good cause is documented, good cause is entered in the case notes and good cause is retained in the case file. Essentially,

hours greater than zero must not be entered in the OSST system unless verification/documentation is secured in compliance with Florida's Work Verification Plan. Hours should not need to be reduced or changed to zero after hours greater than zero have been entered on the JPR screen.

## 2. Managing a TCA Recipient Case in OSST

- Unless the case closes because the participant is sanctioned by the WT program or becomes "exempt" as indicated by the code on the **AGPI screen**, WT program staff must leave the OSST case open and record participation **through the last month** the participant receives TCA. A list of AGPI or referral codes has been provided for program staff as an attachment to this memorandum. Once a closure To-Do or sanction imposed To-Do is received
  - Staff members should review the FLORIDA system to determine the reason TCA closed. Staff must determine the last month the adult or minor head of household will receive TCA and enter this information in the case notes.
  - If the TCA closed for a reason **other than a WT program sanction or exemption based on the AGPI screen code and other information entered on the FLORIDA system**, the case should remain open and participation recorded through the last month TCA is received.
  - Currently, the JPR screen generates blocks to enter hours of participation. The blocks are generated based on the Monday date. Ensure the case remains open through the last week of the last month TCA is received based on the last Monday of the month.
- Managers and supervisors may develop a local operating procedure for staff to complete before closing a WT case. For example, staff may be required to review the case and complete a checklist before closing the case. The information may include the following:
  - The date the closure To-Do was received;
  - The code on the AGPI screen;
  - The definition of the code on the AGPI screen;
  - The last month of cash assistance scheduled to be received;
  - If a WT program sanction was requested by the WT staff and implemented on the cash assistance case by DCF;
  - The month the OSST case should be closed based on the AGPI code, if a WT program sanction was implemented, and last month of cash; and
  - The "post" date of the To-Do created by the staff member to close the case (if applicable).
- There are a variety of processes that can be implemented to ensure cases are closed in a timely manner.
  - Some RWBs have required a supervisor review prior to a WT program case closure.
  - The RWB may require supervisors to review a sample of closures that occur during the month for any problems. If a case was closed too early, staff should be provided technical assistance by the program supervisor. If the participant complied through the last month of TCA receipt or employment is recorded on the FLORIDA or OSST system, the case may be reopened and participation information may be entered.
  - To assist WT program staff with closing cases appropriately, the RWB or program manager may develop a checklist. The checklist provides staff a list of

steps that must be completed before closing a case. If the checklist indicates that the case must stay open until a specific date, a To-Do is set by the program staff member to complete the action at a later date. Please ensure program staff are instructed to review the case prior to closing it in OSST. The participant may have started receiving assistance again.

### **3. Employment**

- If an employment To-Do is received in OSST, review the case in FLORIDA for employment reported to the DCF. Several RWBs have developed a working relationship with the district DCF office. The DCF provides the RWB with employment verification forms so WT program staff can enter employment in the OSST system immediately. We recommend building a relationship with DCF to share employment verification/documentation. If the WT program staff do not secure documentation from the DCF district office, engage the program participant. Send an appointment letter or reminder of an appointment that has already been scheduled. Include in the appointment letter/reminder to bring pay stubs, a verification of employment form, or documentation to support hours of employment.
- The RWB may create incentives to encourage participants to report employment, provide documentation to support hours of employment, and retain employment. The RWB must develop a local operating procedure regarding eligibility for incentives and the process to secure incentives. The local operating procedure should include the type of documentation program participants must submit to receive incentives. Displaying posters about the incentive program and informing program participants about incentives will encourage program participants to report employment and provide documentation of hours.
- If the program participant does not respond to appointment letters, requests for documentation or other notices, the RWB may attempt to secure hours of participation through an alternative source. The RWB may use the Work Number if program staff know who the employer is. The RWB may use the TALX system if the employer is not known; however, there is a cost. The RWB or program staff may also attempt to contact the employer directly. If the RWB or program staff contact the employer, the collateral contact must be documented according to Florida's Work Verification Plan.

### **4. Serving "Refugees"**

- Many areas serve participants that are coded by the DCF as "refugees." These cases are designated by a red "R" on the caseload list. In some counties, the DCF has contracted with a vendor to offer services to refugees that receive Refugee Assistance Program (RAP) cash payments, as well as other refugees in the community. Although the RAP provider will assist recipients of RAP cash assistance and TANF cash assistance with securing proper documentation, assimilating to the community and securing employment, all TANF TCA recipients are referred through the RWB for participation.
  - The RAP provider is not required to engage participants in TANF countable work activities, enter data in OSST, etc. The performance requirements and goals of the RAP program are very different than the performance requirements and goals of the TANF-funded WT program.

- If the RWB has developed a Memorandum of Understanding (MOU) with a RAP provider to engage WT participants, the RWB should review the participation of the refugee cases. The RWB staff or program staff should review WT program participants referred to the RAP provider to determine if they are being engaged in countable work activities, meeting participation and being held accountable for noncompliance.
- Refugees comprise a large percentage of the TANF all-family participation rate sample and **a very large percentage** of the two-parent family participation rate sample.
- Regardless of an MOU between the RWB and the RAP provider, the RWB is still responsible for the participation and performance of TANF-funded TCA recipients coded as “refugees.”