

## State of Florida

### Interim Work Verification Plan

The Deficit Reduction Act of 2005 required Health and Human Services (HHS) to specify what each state must do to verify its work participation information. As outlined in 45 CFR 261.62, each state must establish and employ procedures to:

- Determine whether its work activities may count in the participation rate;
- Determine how to count and verify reported hours of work;
- Identify who is a work-eligible individual; and
- Monitor compliance with the procedures through internal controls.

Each state must submit its interim Work Verification Plan to HHS by February 28, 2007 for approval. Failure to submit the plan opens the state to penalty liability of five percent of the state adjusted Temporary Assistance to Needy Families (TANF) block grant. The plan will be reviewed for completeness. If any modifications are required, HHS will notify states in writing. A state must make all changes and have the final plan approved by HHS no later than September 30, 2007. The State must submit its plan to the Office of Family Assistance (OFA), with a copy to the appropriate Agency for Children and Families (ACF) Regional Office. The original plan must be sent to:

Office of Family Assistance  
Administration for Children and Families  
5<sup>th</sup> Floor East  
370 L'Enfant Promenade, SW.  
Washington, DC 20447

**I. General provisions:** The plan is designed for the State to define each of the 12 countable work activities (within federal definitions) as well as how the State determines the countable hours and the documentation used to monitor participation in an effort to ensure that only actual hours are reported. There are four general guidelines that should be followed when drafting the definitions and requirements for the work activities under the plan (for each activity):

1. Describe the services or programs the state will use to meet the federal work category. Does the definition include and meet all federal requirements?
2. Describe how Florida determines the number of countable hours of participation for each component of the activity.
3. Describe how the state verifies the "actual" hours of participation for the activity. Include the procedures for obtaining and maintaining the documentation used.
4. Describe the methods of daily supervision that the state will use.

#### Florida Background:

The Temporary Assistance for Needy Families (TANF) Program in Florida is carried out 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).

Revised Submission

2/28/07

For purposes of this work verification plan, the DCF, WFI and the AWI have collaborated to describe the necessary 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 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 45-member 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 with RWBs 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. Career Managers in the RWBs enter work activity data directly into the One Stop System Tracking (OSST) system. OSST maintains the data and DCF extracts required elements from it for monthly and quarterly reports.

The 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 and OSST data integrity. 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
<b>Unsubsidized Employment</b>	
1. Describe the services or programs the state includes under the activity.	<p><b>Current operational language:</b></p> <p>Full or part-time employment in the public or private sector that is not subsidized by TANF or any other public program, which includes the following:</p> <ul style="list-style-type: none"> <li>• Recipients whose employers claim a tax credit for hiring economically disadvantaged workers;</li> <li>• Labor in exchange for services or other amounts (rent, utilities, etc.); and</li> <li>• Self-employment.</li> </ul> <p><b>Upon legislative approval during the 2007 Legislative Session, Florida will include the following services or programs under this activity:</b></p> <p>Full or part-time employment in the public or private sector that is not subsidized by TANF or any other publicly funded</p>

<p><b>Unsubsidized Employment (Cont.)</b></p>	<p>program, which includes the following:</p> <ul style="list-style-type: none"> <li>• Recipients whose employers claim a tax credit for hiring economically disadvantaged workers;</li> <li>• Labor in exchange for services or other amounts (rent, utilities, etc.); and</li> <li>• Self-employment.</li> </ul>
<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 uses data on unsubsidized employment maintained in either the AWI system or the DCF system for its reports: (a) work status information entered by RWB workforce staff into OSST (b) work status information supplied by applicant/participant entered and retained in FLORIDA. Therefore, the plan describes two processes for determining the number of hours countable for participation in unsubsidized employment.</p> <p>The State may also use automated confirmation/documentation of employment as recorded in other recognized databases such as National Directory of New Hires and The Work Number (described as America’s leader in automated employment income verification).</p> <p>(a) An RWB staff member must secure documentation for each countable hour of participation prior to entering the hours in OSST. 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 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 staff member does not automatically enter scheduled hours. Staff collects verification of participation for each hour before manually populating the data entry field.</p> <p>(b) The DCF determines and verifies income/hours at initial application and six months later at re-determination. DCF also determines and verifies income/hours any time a participant reports a new source of income or a decrease in income. The Department accepts an individual’s statement of an increase in income until re-determination. Hours of work are recorded on FLORIDA system screens designated for employment. Verification of income/hours is via employer statement or pay stubs submitted by the individual.</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 personnel verify hours of actual participation through documentation that includes (but is not limited to) a verification of employment signed by the employer, pay stubs, timesheets, a copy of a check, money order, or other payment forms submitted by the individual. If documents do not indicate “wage per hour” or “actual hours completed,” staff divide salary by the applicable minimum wage to calculate the total hours worked for the time period.</p> <p>Staff may also verify employment hours by contacting the employer directly; however, this is not a preferred method of verification (as stated in federal guidance). Verification of employment or employment information through employer contact must include the employer’s name, date contacted, person talked with, contact information and the name of the staff person who has secured the verification. A staff member enters the information in OSST and maintains the</p>

<p><b>Unsubsidized Employment (Cont.)</b></p>	<p>verification in the case file.</p> <p>The DCF verifies hours via employer statement or pay stubs submitted by the individual, enters the information in FLORIDA and maintains the information in the case file.</p> <p>Participation hours submitted in the 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 will not be acceptable as documentation. For self-employed individuals, Florida will count hours of participation based on the number that results from dividing the gross income minus business expenses by the applicable minimum wage and verified by the documentation presented. Data will be entered on the appropriate system according to which agency receives the documentation.</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 based on federal provisions. The state will report projected hours of participation in unsubsidized employment for up to six months based on documented actual hours of work for a representative time period. The documentation may be employer statement and/or pay stubs submitted by the employed individual.</p> <p>Any time either system (workforce or eligibility) receives 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><b>Subsidized Private Sector Employment</b></p>	
<p>1. Describe the services or programs the state includes under the activity.</p>	<p><b>Current operational language:</b></p> <p>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. The following models are included under subsidized private sector employment:</p> <ol style="list-style-type: none"> <li>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 applicable minimum wage. Work supplementation may not exceed six months. At the end of the supplementation period, the employer is expected to retain the participant as a regular employee without receiving continued subsidy.</li> <li>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.</li> </ol>

<p><b>Subsidized Private Sector Employment (Cont.)</b></p>	<p>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, but not limited to, transportation, family support, or additional supervision.</p> <p>Regional Workforce Boards may develop other models but must submit them to the State Board prior to implementation to ensure they meet definition requirements. Pertinent changes will be submitted as amendments to this Work Verification Plan if 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>Florida primarily uses data on subsidized private sector employment maintained in either the AWI system or the DCF system for its reports: (a) work status information entered by RWB workforce staff into OSST (b) work status information supplied by applicant/participant entered and retained in FLORIDA. Therefore, the plan describes two processes for determining the number of hours countable for participation in subsidized private sector employment. The State may also use automated confirmation of employment as recorded in other approved databases.</p> <p>(a) An RWB staff member must secure documentation for each countable hour of participation prior to entering the hours in OSST. 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 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 staff member does not automatically enter scheduled hours. Staff collects verification of participation for each hour before manually populating the data entry field.</p> <p>(b) The DCF determines and verifies income/hours at initial application and six months later at re-determination. DCF also determines and verifies income/hours any time a participant reports a new source of income or a decrease in income. The Department accepts an individual’s statement of an increase in income until re-determination. Hours of work are recorded on FLORIDA system screens designated for employment. Verification of income/hours is via employer statement or pay stubs submitted by the individual.</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 personnel verify hours of actual participation through documentation that includes (but is not limited to) a verification of employment signed by the employer, and/or pay stubs, timesheets, a copy of a check, money order, or other payment forms submitted by the individual. Other sources of documentation may include the WORK number. If documents do not indicate “wage per hour” or “actual hours completed,” staff divide the pay by the applicable minimum wage to calculate the total hours worked for the time period.</p> <p>Staff may also verify employment hours by contacting the employer directly; however, this is not a preferred method of verification (as stated in federal guidance). Verification of employment or employment information through employer contact must include the employer’s name, date contacted, person talked with, contact information and the name of the staff person who has secured the verification. A staff member enters the information in OSST and maintains the verification in the case file.</p>

<p><b>Subsidized Private Sector Employment ( (Cont.)</b></p>	<p>The DCF verifies hours via employer statement or pay stubs submitted by the individual, enters the information in FLORIDA and maintains the information in the case file.</p> <p>Participation hours submitted in federal reports are from either agency's automated system according to which agency receives the documented 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 based on federal provisions. 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 for a representative time period. The documentation may be employer statement and/or pay stubs submitted by the employed individual.</p> <p>Any time either system (workforce or eligibility) receives 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><b>Subsidized Public Sector Employment</b></p>	
<p>1. Describe the services or programs the State includes under the activity.</p>	<p><b>Current operational language:</b></p> <p>Supervised employment in the public sector where the employer receives a subsidy to offset the cost of wages and benefits paid to a TANF participant. The following models are included under subsidized public sector employment:</p> <ol style="list-style-type: none"> <li>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 applicable minimum wage. Work supplementation may not exceed six months. At the end of the supplementation period, the employer is expected to retain the participant as a regular employee without receiving continued subsidy.</li> <li>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.</li> <li>3. Supported work—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, but not limited to, transportation, family support, or additional supervision.</li> <li>4. Work Study—This is an employment opportunity offered by educational institutions to students in need. The</li> </ol>

<p><b>Subsidized Public Sector Employment (Cont.)</b></p>	<p>students work a contracted number of hours for a stipend provided by the educational institution.</p> <p>Regional Workforce Boards may develop other models but must submit them to the State Board prior to implementation to ensure they meet definition requirements. Pertinent changes will be submitted as amendments to this Work Verification Plan if 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>Florida primarily uses data on subsidized public sector employment maintained in either the AWI system or the DCF system for its reports: (a) work status information entered by RWB workforce staff into OSST (b) work status information supplied by applicant/participant entered and retained in FLORIDA. Therefore, the plan describes two processes for determining the number of hours countable for participation in subsidized public sector employment. The State may also use automated confirmation of employment as recorded in other approved databases.</p> <p>(a) An RWB staff member must secure documentation for each countable hour of participation prior to entering the hours in OSST. 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 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 staff member does not automatically enter scheduled hours. Staff collects verification of participation for each hour before manually populating the data entry field.</p> <p>(b) The DCF determines and verifies income/hours at initial application and six months later at re-determination. DCF also determines and verifies income/hours any time a participant reports a new source of income or a decrease in income. The Department accepts an individual's statement of an increase in income until re-determination. Hours of work are recorded on FLORIDA system screens designated for employment. Verification of income/hours is via employer statement or pay stubs submitted by the individual.</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 personnel verify hours of actual participation through documentation that includes (but is not limited to) a verification of employment signed by the employer, and/or pay stubs, timesheets, a copy of a check, money order, or other payment forms submitted by the individual. If documents do not indicate "wage per hour" or "actual hours completed," staff divide salary by the applicable minimum wage to calculate the total hours worked for the time period.</p> <p>Staff may also verify employment hours by contacting the employer directly; however, this is not a preferred method of verification (as stated in federal guidance). Verification of employment or employment information through employer contact must include the employer's name, date contacted, person talked with, contact information and the name of the staff person who secured the verification. A staff member enters the information in OSST and maintains the verification in the case file.</p> <p>The DCF verifies hours via employer statement or pay stubs submitted by the individual. The DCF then enters the information in FLORIDA and maintains the information in the case file.</p>

<p><b>Subsidized Public Sector Employment (Cont.)</b></p>	<p>Participation hours submitted in federal reports are from either agency’s automated system according to where the documentation is received and recorded.</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 based on federal provisions. The state will report projected hours of participation in subsidized public employment for up to six months based on documented actual hours of work for a representative time period. The documentation may be employer statement and/or pay stubs submitted by the employed individual.</p> <p>Any time either system (workforce or eligibility) receives 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><b>Work Experience</b></p>	
<p>1. Describe the services or programs the state includes under the activity.</p>	<p><b>Current operational language:</b></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 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 basic employability skills, training, job knowledge and work habits necessary to obtain and retain employment. The job training experience must be in a public or private not-for-profit agency, must be intensely supervised, structured and designated by a contract with the worksite entity. The job training contract must include performance benchmarks, goals, outcomes, and time limits (to ensure participants are moving towards employment). During participation at a work experience worksite, the participant must also be engaged in some form of education or training related to the participant’s goals. Those hours must be recorded under the appropriate educational code, not work experience.</p> <p><b>Upon legislative approval during the 2007 Legislative Session, Florida will include the following services or programs under this activity:</b></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 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, training, job knowledge and work habits necessary to obtain and retain employment. The job training experience may be at a for-profit or not-for-profit entity, intensely supervised, structured and designated by a contract with the worksite entity. Prior to placement, potential work experience providers are evaluated to match the participant with a position that is 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).</p>

<p><b>Work Experience (Cont.)</b></p>	<p>The state will establish a clear displacement policy. 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 determines the maximum number of hours 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. This total is then divided by 4.3 to determine weekly required hours.</p> <p>b) An RWB staff member must secure documentation for each countable hour of participation prior to entering the hours in OSST. 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 temporary cash assistance and required to participate in the work program. The data entry 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. The RWB staff 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 activity. Include the procedures for obtaining and maintaining documentation of hours of participation.</p>	<p>Since the first submission of the work verification plan, AWI updated the OSST system. The system generates a field to record actual hours of participation for each week an individual receives cash assistance, is required to participate in the work program and is assigned to a work experience activity. Documentation of participation hours may include timesheets and attendance records.</p> <p>To ensure daily supervision, the documentation must include the signature of an employer, worksite sponsor or other responsible party and must be forwarded to the RWB staff no less frequently than every two weeks. Hours are manually entered into the workforce system based on verification of actual hours completed, and the verification is maintained in the case file. 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>Due to Florida's devolved TANF program model that grants RWBs local discretion in program development to fit the community's needs, work experience programs will vary based on the region, the participant's goals, employers in the community, etc.</p> <p>Florida's Work Experience program does not require daily supervision at this time, however, guidance will be issued prior to submission of the final Plan to require daily supervision of each work experience assignment. Documentation of attendance by worksite staff, along with regular communication between the RWB and worksite supervisor/coordinator, will demonstrate daily supervision. Staff members enter the hours in OSST and maintain the verification in the case file.</p>

<p><b>Work Experience (Cont.)</b></p>	
<p>Special Documentation:  None</p>	
<p><b>On-the-Job Training</b></p>	
<p>1. Describe the services or programs the state includes under the activity.</p>	<p><b>Current operational language:</b></p> <p>Training in the public or private sector given to a full-time paid employee. The employer or educational institution, in cooperation with the employer, provides training needed for the participant to perform the skills required for the position. The employer or the educational institution, on behalf of the employer, receives a subsidy to offset the cost of the training provided to the participant. Upon satisfactory completion of the training, the employer is expected to retain the participant as a regular employee without receiving a subsidy. An on-the-job training agreement may not be continued with an employer who exhibits a pattern of failing to provide participants with continued employment after the on-the-job training subsidy ends.</p> <p><b>Upon legislative approval during the 2007 Legislative Session, Florida will include the following services or programs under this activity:</b></p> <p>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 will include an agreement between the RWB and the employer and/or educational institution. An OJT agreement may not be continued with an employer who exhibits a pattern of failing to provide participants with continued employment after the OJT ends.</p> <p>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, but not limited to, transportation, family support, or additional supervision. In order for this activity to be included under OJT, it must contain training and intensive education opportunities coupled with employment opportunities.</p>

<p><b>On-the-Job Training (Cont.)</b></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 secure documentation for each countable hour of participation prior to entering the hours in OSST. 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 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 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 personnel verify hours of actual participation in OJT through documentation that includes (but is not limited to) a signed contract by the employer with verification of employment signed by the employer, pay stubs, timesheets, a copy of a check, money order or other payment forms. If documents do not indicate “wage per hour” or “actual hours completed,” staff divide salary by minimum wage to calculate the total hours worked for the time period.</p> <p>Staff may also verify employment hours by contacting the employer directly; however, this is not the preferred method of regular on-going verification (as stated in federal guidance). In addition to employment information on hours, wages, etc, employer contact verifications must include the employer’s name, date contacted, person talked with, contact information and the name of the individual who has secured the verification. A staff member enters the information in the OSST and maintains the verification in the case file.</p>
<p>4. Describe the methods of daily supervision that the state will use.</p>	<p>Currently Florida’s OJT program does not require daily supervision, however, the AWI will issue guidance prior to submission of the final Plan to require supervision and documentation of attendance by the employer or appropriate staff. The signed timesheet or attendance record will serve as documentation of daily supervision. Staff members enter the hours in the system and maintain the verification 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 distinguish itself from subsidized employment, each OJT position is based on a contractual agreement that requires the participant to be trained for a specific (or similar) employment position while working. Upon satisfactory completion of the training, the employer is expected to retain the employee without further subsidy. The type of training slots for participants will vary based on the labor market, employment openings in the local area, the participant’s goals, and the employer’s skill requirements for hiring, etc. 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 current documented actual hours of work for a representative time period. The documentation may be employer statement and/or pay stubs submitted by the employed individual.</p>

<p><b>On-the-Job Training (Cont.)</b></p>	<p>Any time workforce receives 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><b>Job Search and Job Readiness</b></p>	
<p>1. Describe the services or programs the state includes under the activity.</p>	<p><b>Current operational language:</b></p> <p>The act of seeking or obtaining employment, as well as learning how to seek employment. Job search and job readiness assistance may include substance abuse treatment, mental health treatment, or rehabilitation activities for those who are otherwise employable.</p> <p>Job search and job readiness assistance may include orientation to the world of work; basic job seeking skills; job retention skills; instruction in completing an application; interviewing skills; resume development; appropriate dress; career planning; etc. Such information may be provided during workshops and classes. Participants may also be allowed to use resource centers, computers, and other resources to apply for jobs, develop cover letters, write follow-up notes, etc. Participants may also apply for jobs at the worksite directly with the 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 "otherwise employable." Treatment must be determined necessary. Treatment may include in-patient or out-patient classes, workshops, group therapy, individual therapy, and other sessions.</p> <p><b>Upon legislative approval during the 2007 Legislative Session, Florida will include the following services or programs under this activity:</b></p> <p>The act of seeking or obtaining employment, as well as learning how to seek employment, job search and job readiness assistance may include 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; etc. Such information may be provided during workshops and classes. Participants may also be allowed to use resource centers, computers, and other resources to apply for jobs, develop cover letters, write follow-up letters, etc. Participants may also apply for jobs at the worksite directly with the 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 "otherwise employable." Treatment must be determined necessary. Treatment may include in-patient or out-patient classes, workshops, group therapy, individual therapy, detoxification, rehabilitation activities and other sessions determined medically necessary.</p>

Job Search and Job Readiness (Cont.)	
<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 secure documentation for each countable hour of participation prior to entering the hours in the OSST. 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 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 staff member does not automatically enter scheduled hours, but verifies participation for each hour before manually populating the data entry field.</p> <p>Actual hours spent in a structured in-house <u>job readiness</u> program or at a substance abuse or mental health treatment program will be entered as countable hours of participation. Actual hours spent in a structured in-house <u>job search</u> or substance abuse/mental health treatment program will be entered as countable hours of participation. The RWB staff will track hours spent in job readiness assistance and in structured, in-house job search and enter the hours into OSST as described above. Substance abuse and mental health treatment hours will be recorded on a timesheet and signed by the responsible party verifying attendance.</p> <p>Each on-site contact must be recorded on a manually-maintained activities log. The participant must submit the log of the daily contacts at least bi-weekly. The log will record a participant's actual hours of job searching. A representative of the employer or an RWB staff member may certify the validity of the log by initialing each entry. Searches done via telephone and via internet will be recorded on the job search report form, must include specific information for follow-up by RWB staff, and must be logged on to a timesheet. The timesheet entries will serve as the basis for recording countable hours of participation.</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>Under current Florida Statute, job search and job readiness assistance allow for both supervised in-house and unsupervised on-site job searches. OSST allows the RWBs to enter job search and job readiness. Job readiness is considered a structured, in-house program; job search may be structured in-house or on-site.</p> <p>Actual hours spent in a structured, in-house job readiness program will be entered as countable hours of participation. Actual hours spent in a structured, in-house job search will be entered as countable hours of participation. The RWB staff will track hours spent in job readiness assistance and on in-house job search and enter the hours into the OSST. Local operating procedures will define acceptable documentation and may include sign in/activity logs that are verified by the RWB 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. A contact number must be provided unless the RWB verifies the completion of on-site activities through another procedure, such as random contacts or receipt of copies of applications.</p>

<p><b>Job Search and Job Readiness (Cont.)</b></p>	<p>Documentation of job search activities must be retained in the case file.</p>
<p>4. Describe the methods of daily supervision that the state will use.</p>	<p>Currently Florida's job search (both in-house and on-site) and job search assistance do not require daily supervision, however, the AWI will issue guidance prior to submission of the final Plan to require supervision and documentation of attendance by the employer or appropriate staff.</p> <p>In-house job search and job readiness assistance will be part of a structured activity and will be supervised by the RWB staff on a daily basis.</p> <p>On-site job search will be tracked on a daily basis using signed timesheets/contact sheets, job search entry logs, and other activity tracking processes established by the RWB. On-site job search will be supervised 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>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> <ol style="list-style-type: none"> <li>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.</li> <li>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).</li> </ol>	<ol style="list-style-type: none"> <li>1. "Otherwise employable" will be assessed by the RWB and SAMH professionals. The SAMH professional will certify the participant's need for mental health or substance abuse treatment and will state whether the participant can function successfully at a job, if treatment stabilizes the mental health or substance abuse condition. The medical or mental health professional who certifies treatment should be licensed and/or board certified to practice in the state of Florida. However, licensed practitioners do not lead all treatment sessions. Counselors or lay staff lead some sessions. The RWB 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 OSST participation field.</li> <li>2. The DCF maintains a historical file of work eligible individuals for each federal fiscal year 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 week used. Before reporting hours engaged in job search to meet work participation requirements, DCF references this file to ensure that neither more than a total of six weeks nor more than four consecutive weeks are reported as countable hours.</li> </ol>
<p><b>Community Service Program</b></p>	
<p>1. Describe the services or programs the state includes under the activity.</p>	<p><b>Current operational language:</b></p> <p>Community service is a structured program in which TANF recipients perform work for the direct benefit of the community under the auspices of not-for-profit organizations. Community service programs must be limited to projects that serve a useful community purpose in fields such as health, social service, environmental protection, education, urban and rural redevelopment, welfare, recreation, public facilities, public safety and childcare. Community service programs are designed to improve the employability of recipients who are not able to obtain employment. The RWB should consider the participants' prior training, experience and skills in making appropriate community service</p>

<p><b>Community Service Program (Cont.)</b></p>	<p>assignments.</p> <p>Community service may be selected as an activity for a participant who needs to increase employability by improving his or her interpersonal skills, job retention skills, stress management, and job problem solving, and by learning to attain a balance between job and personal responsibilities.</p> <p><b>Upon legislative approval during the 2007 Legislative Session, Florida will include the following services or programs under this activity:</b></p> <p>Community service is a structured program in which cash assistance recipients perform work for the direct benefit of the community under the auspices of not-for-profit organizations. Community service programs must be limited to projects that serve a useful community purpose in fields such as health, social service, environmental protection, education, urban and rural redevelopment, welfare, recreation, public facilities, public safety, and childcare.</p> <p>Community service programs are designed to improve the employability of recipients who are not able to obtain employment. The RWB will consider the participants' prior training, experience and skills in making an appropriate community service assignment.</p> <p>Community service may be selected as an activity for a participant who needs to increase employability by improving his or her interpersonal skills, job retention skills, stress management, problem solving, and learning 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 <b>scheduled</b> 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 result is then divided by 4.3 to determine weekly required hours.</p> <p>2. An RWB staff member must secure documentation for each countable hour of participation prior to entering the hours in OSST. 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 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 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>Each hour of actual participation is verified through documentation signed by designated representative of the community service provider. The automated system generates a field to record actual hours of participation each week the individual receiving cash assistance is required to participate in the work program and is assigned to community service. Documentation of hours of participation must be forwarded to the RWB staff no less frequently than every two weeks and must include timesheets, daily attendance records, or some other form of attendance log</p>

<p><b>Community Service Program (Cont.)</b></p>	<p>signed by a designated party at the community service organization. Countable hours are manually entered in the OSST, and the verification is maintained in the case file. Because a community service program is a structured program, workforce staff will communicate with the worksite supervisor and verify attendance and progress on a regular basis.</p>
<p>4. Describe the methods of daily supervision that the state will use.</p>	<p>Due to Florida's devolved TANF program model that grants RWBs broad latitude in program development to fit the community's needs, community service programs will vary based on the region, the participant's goals, employers in the community, etc.</p> <p>Florida's Community Service Work Experience program does not require daily supervision at this time. The AWI will issue guidance prior to the submission of the final Plan to require daily supervision. The signed attendance sheets, logs or other attendance records will serve as evidence of daily supervision. The RWB staff members enter the hours in OSST and maintain the verification of attendance and supervision in the case file.</p>
<p>Special Documentation</p> <ol style="list-style-type: none"> <li>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.</li> <li>2. 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.</li> </ol>	<ol style="list-style-type: none"> <li>1. The RWB enters in a community service program contract with the non-profit or public organization selected for the community service program participant, creating an employee/employer relationship.</li> </ol> <p>The RWB assigns scheduled hours based on the following calculation: Cash assistance amount added to the food stamp allotment, divided by the Florida minimum wage, divided by 4.3 weeks.</p> <ol style="list-style-type: none"> <li>2. The participant may locate a community service project by personal initiative and inform the RWB. The RWB will negotiate a community service program contract with the community service agency that includes all required provisions of federal regulations.</li> </ol>
<p><b>Vocational Education and Training</b></p>	
<p>1. Describe the services or programs the state includes under the activity.</p>	<p><b>Current operational language:</b></p> <p>This activity is education and training that prepares the individual for employment in current or emerging occupations through organized training. This does not include Baccalaureate or other advanced degrees. However, it does include associates degrees. Vocational education must be provided by an educational institution. Currently, this activity may not include basic education or basic skills training such as English language proficiency or secondary educational instruction.</p> <p><b>Upon legislative approval during the 2007 Legislative Session, Florida will include the following services or programs under this activity:</b></p> <p>This activity is education and training that prepares the individual for employment in current or emerging occupations through organized training in Florida's secondary, vocational technical, community colleges and proprietary schools.</p>

<p><b>Vocational Education and Training (Cont.)</b></p>	<p>Vocational education and training does not include Baccalaureate or other advanced degrees; it does, however, include certificate, AA and AS degrees approved by Florida's K-20 educational governing bodies. Vocational education and training may include vocational programs that have secondary education, basic education or English language proficiency embedded in the program.</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 secure documentation for each countable hour of participation prior to entering the hours in OSST. 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 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 staff member does not automatically enter scheduled hours, but verifies each hour before manually populating the data entry field.</p> <p>Countable hours may include, in addition to actual classroom hours, supervised time spent in required labs and clinical settings and supervised study halls.</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 personnel verify hours of actual participation through documentation that includes (but is not limited to) timesheets and daily attendance records or logs submitted to the RWB no less than every two weeks by the training facility. The RWB staff may also verify participation hours by contacting an instructor or other supervisor directly. Attendance information must include the participant's name, the course, lab or study hall and instructor's/supervisor's name, the name of the person certifying attendance and the inclusive dates of attendance. An RWB staff member enters the information in OSST and maintains the verification in the case file.</p>
<p>4. Describe the methods of daily supervision that the state will use.</p>	<p>Currently, Vocational Education and Training does not require daily supervision. Prior to the submission of the final Plan, the AWI will issue new guidance to require daily supervision of the activity. Supervision will be certified by the instructor, required activity supervisor, on-line distance learning system or other authorized staff for each day the individual attends the activity and earns participation hours. The RWB staff must verify hours through the signed timesheet, attendance record, etc. Staff will record hours in OSST and maintain the verification in the case file.</p>
<p>Special Documentation:</p> <p>1. Describe how the state ensures participation in vocational educational training does not count beyond the statutory limitations limiting participation to 12 months lifetime per individual?</p>	<p>1. The DCF maintains a 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 references this file to ensure that not more than 12 months in a lifetime have been used.</p>

<p><b>Vocational Education and Training (Cont.)</b></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>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. 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 segments are integrated as part of the skills being taught in the technical segments. Thus the nature of the curriculum design limits remedial work and insures it is of short duration. Participants are required to document schedules and course requirements each semester.</p>
<p><b>Job Skills Training Directly Related to Employment</b></p>	
<p>1. Describe the services or programs the state includes under the activity.</p>	<p><b>Current operational language:</b></p> <p>Education or training to obtain skills designed to meet the needs of a specific employer, job or industry, including customized training. The training may also include education that allows the individual to adapt to the changing demands of the workplace. This training shall include literacy instruction and may include English proficiency instruction or other language instruction, if necessary, to enhance employment opportunities in the local communities. Participants should be assessed prior to entry to ensure participants are engaged appropriately.</p> <p><b>Upon legislative approval during the 2007 Legislative Session, Florida will include the following services or programs under this activity:</b></p> <p>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 both customized and general training to prepare an individual for employment. This may include literacy and language instruction if necessary to enable the participant to perform a specific job or engage in a specific job training program. 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>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 secure documentation for each countable hour of participation prior to entering the hours in OSST. 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 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 staff member does not automatically enter scheduled hours, but verifies each hour before manually populating the data entry field.</p>

<p><b>Job Skills Training Directly Related to Employment (Cont.)</b></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 personnel verify hours of actual participation through documentation that includes (but is not limited to) timesheets and daily attendance records or logs submitted to the RWB no less than every two weeks by the training facility or job site. The RWB 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 staff member enters the information in OSST and maintains the verification in the case file.</p>
<p>4. Describe the methods of daily supervision that the state will use.</p>	<p>Currently, Job Skills Training Directly Related to Employment does not require daily supervision. Prior to the submission of the final Plan, the AWI will issue guidance to require daily supervision of this activity. Supervision will be certified by the instructor, on-line distance learning system or other authorized staff for each day the individual attends the activity and earns participation hours. The RWB staff must verify hours through the signed timesheet, attendance record, etc. Staff will record hours in OSST and maintain the verification in the case file.</p>
<p>Special Documentation:  NONE</p>	
<p><b>Education Directly Related to Employment</b></p>	
<p>1. Describe the services or programs the state includes under the activity.</p>	<p><b>Current operational language:</b></p> <p>Education related to a specific occupation, job or job offer. This activity may include adult basic education and ESL. This activity may include education leading to a General Equivalency Diploma (GED) when it is required by an employer and is an activity for individuals who are less than 19 years of age and who do not have a high school diploma or GED.</p> <p><b>Upon legislative approval during the 2007 Legislative Session, Florida will include the following services or programs under this activity:</b></p> <p>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. 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 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 secure documentation for each countable hour of participation prior to entering the hours in OSST. 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 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.</p>

<p><b>Education Directly Related to Employment (Cont.)</b></p>	<p>A 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 personnel verify hours of actual participation through documentation that includes (but is not limited to) timesheets and daily attendance records or logs submitted to the RWB no less than every two weeks by the training facility, participant or other supervisor. The RWB 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 staff member enters the information in OSST and maintains the verification in the case file.</p>
<p>4. Describe the methods of daily supervision that the state will use.</p>	<p>Currently, Education Directly Related to Employment does not require daily supervision. Prior to submission of the final Plan, the AWI will issue guidance to require daily supervision of this activity. Supervision will be certified by the instructor, on-line distance learning system or other authorized staff for each day the individual attends the training or related activity and earns participation hours. The RWB staff must verify hours through the signed timesheet, attendance record or direct contact. Staff will record hours in OSST and maintain the verification in the case file.</p>
<p>Special Documentation: 1. Describe the state's criteria for "good or satisfactory progress" and how it is documented.</p>	<p>Currently, Florida does not require the provision of "good or satisfactory progress" for hours to be counted in the participation hours.</p> <p>The institution or training facility will determine "good or satisfactory progress," document it by assessment or instructor observation records and report it to the workforce provider. Because participants are entered in various programs with various institutions/employers and start at different education levels, the educational institution will be required to provide written verification of progress on a regular basis, but no less than every two weeks. Prior to entry in a basic education or GED program required for employment, the individual must have a complete assessment through one of the state approved standardized tests, such as the Test for Adult Basic Education (TABE). The individual will be retested periodically and scores compared and recorded as a part of the "good or satisfactory progress" determination.</p> <p>Currently, there is no place to record this information in OSST. Staff will retain verification of satisfactory progress in the case file. In the future, the system will be updated to establish a field for recording the progress of the individual and receipt of verification to ensure that hours compiled for this activity meet this requirement. AWI will monitor case files to ensure that progress is recorded for each participant in the activity.</p>
<p><b>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)</b></p>	
<p>1. Describe the services or programs the state includes under the activity.</p>	

<p><b>Satisfactory Attendance at a Secondary School or in a Course of Study Leading to a GED (Cont.)</b></p>	<p><b>Current operational language:</b> This activity is limited to participants without a high school diploma or GED. 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 completing an adult basic education program must be directly related to obtaining a high school diploma or GED. Hours counted under this activity cannot include unsupervised homework time.</p> <p><b>Upon legislative approval during the 2007 Legislative Session, Florida will include the following services or programs under this activity:</b></p> <p>This educational activity is limited to participants without a high school diploma or GED. 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 completing an adult basic education program must be directly related to obtaining a high school diploma or GED. Hours counted under this activity cannot include unsupervised homework time.</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 secure documentation for each countable hour of participation prior to entering the hours in OSST. 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 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 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 personnel verify hours of actual participation through documentation that includes (but is not limited to) timesheets and daily attendance records or logs submitted to the RWB no less than every two weeks by the training facility or job site. The RWB 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 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 staff member enters the information in the tracking system and maintains the verification in the case file.</p>
<p>4. Describe the methods of daily supervision that the state will use.</p>	<p>Currently Satisfactory Attendance at a Secondary School or in a Course of Study Leading to a GED does not require daily supervision. Prior to the submission of the final Plan, however, the AWI will issue guidance to require daily supervision of this activity. Supervision will be certified by the instructor, on-line distance learning system or other authorized staff for each day the individual attends the activity and earns participation hours. The RWB staff must verify hours through the signed timesheet, attendance record or direct contact. Staff will record hours in OSST and maintain the verification in the case file.</p>
<p>Special Documentation: 1. Describe the state's criteria for "good or satisfactory progress" and when and how it is documented.</p>	<p>Currently, Florida does not require the provision of "good or satisfactory progress" for hours to be counted in the participation hours. Prior to the submission of the final Plan, however, the AWI will issue guidance to require that an RWB has verification of "good or satisfactory progress" prior to entering countable hours.</p> <p>The institution or training facility will determine "good or satisfactory progress," document it by assessment or instructor</p>

<p><b>Satisfactory Attendance at a Secondary School or in a Course of Study Leading to a GED (Cont.)</b></p>	<p>observation records and report it to the workforce provider. Because participants are entered in various programs with various institutions/employers and start at different education levels, the educational institution will be required to provide written verification of progress on a regular basis, but no less frequently than every two weeks. Prior to entry in a basic education or GED program required for employment, the individual must have a complete assessment through one of the state approved standardized tests, such as the Test for Adult Basic Education (TABE). The individual will be retested periodically and the scores compared and recorded to serve as part of the “good or satisfactory progress” determination.</p> <p>Currently, there is no place to record this information in OSST. Staff will retain verification of progress in the case file. In the future, the system will be updated to establish a field for recording the progress of the individual and receipt of verification to ensure that hours compiled for this activity meet this requirement. The AWI will monitor case files to ensure that progress is recorded for each participant in the activity.</p>
<p><b>Providing Child Care Services</b></p>	
<p>1. Describe the services or programs the state includes under the activity.</p>	<p><b>Current operational language:</b> This is an activity where a participant provides child care for another TANF recipient completing community service hours. The number of hours the participant assigned to “Providing Child Care” is based on the number of hours for which the individual who is receiving childcare is assigned to community service.</p> <p><b>Upon legislative approval during the 2007 Legislative Session, Florida will include the following services or programs under this activity:</b></p> <p>Providing child care services to an individual who is participating in a community service program means providing child care to enable another TANF recipient to participate in a community service program. This does not include providing child care to enable a TANF recipient to participate in any of the other eleven allowable work activities. 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 required number of hours an individual must be participating in this activity to provide child care services is equal to the number of hours assigned to the participant in a community service program. The calculation for determining those 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>Hours of actual participation are verified through documentation of hours that may include timesheets and attendance records. The documentation of countable hours for the participant providing child care services will include the signature of the individual completing the community service hours. Workforce staff will communicate with each individual frequently and verify their participation in both activities on a regular basis. The participant in the community service program must provide documentation of hours to the RWB staff no less frequently than every two weeks. 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 temporary cash assistance and required to participate in the work program. The</p>

<b>Providing Child Care Services (Cont.)</b>	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. The RWB staff collects verification of each hour before manually populating the data entry field.
4. Describe the methods of daily supervision that the state will use.	Evidence of daily supervision for child care services will be the timesheet or attendance record signed by the participant in the community service program submitted to staff. Staff will record hours in the system and maintain the verification in the case file.
Special Documentation: NONE	

## 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 an activity provider:
  1. **New Year's Day;**
  2. **Martin Luther King's Birthday (observed);**
  3. **President's Day (observed);**
  4. **Washington's Birthday (observed);**
  5. **Memorial Day;**
  6. **Independence Day (observed);**
  7. **Labor Day;**
  8. **Columbus Day (observed);**
  9. **Veteran's Day (observed);**
  10. **Thanksgiving (Thursday and Friday);**
  11. **Christmas Eve; and**
  12. **Christmas Day**

Florida will also grant participation hours for hours scheduled with a provider (community service, worksite, training, education, etc.) whose facility or business is closed in observance of a holiday. Florida will also grant hours for participants who are scheduled for participation with a provider that is closed (for a specified period of time) because

of a natural or man-made disaster, such as a hurricane, tornado, flood, fire, earthquake, terrorist attack, etc. Documentation to support the attribution of such hours outside of the state or federal calendar will be designated by the state and retained in the case file (electronic or hard file).

- iii. **Excused absence for paid activities**—Florida will grant participation credit for scheduled hours a participant misses due to illness for which the individual was paid and/or used sick leave.
- iv. **Excused absence for unpaid hours/activities**—Florida will allow the RWBs to excuse up to ten absences during the federal fiscal year and attribute hours towards participation. The ten days of excused absences may include days (or part of a day) missed due to doctor’s appointments, school conferences, court appointments, illness, etc. Excused absences will be recorded and tracked in the automated system. However, days will not be divided into partial days or hours. Each hour used on a date of missed activities will count as one full excused absence according to federal guidance.
- 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 un-paid holiday. However, the system is being modified to track such dates. Staff will also provide notes regarding the provision of credits. Individuals will have to be scheduled to the activity prior to the hours being credited.

### **FLSA Deeming**

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 applicable 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.

The State of Florida has been approved to conduct a mini Simplified Food Stamp Program. The RWBs will calculate the scheduled weekly worksite or community service hours by adding the amount of the cash assistance and the food stamp allotment, dividing the resulting figure by the Florida minimum wage and dividing that resulting figure by 4.3 to obtain the minimum required hours. The RWB staff enter actual hours completed and verified into the system and maintain documentation in the case file.

### **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 or spouse of the head-of-household;
- b. An alien 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:

- a. A parent providing care for a disabled family member living in the home who does not attend school on a full-time basis, provided that the need for such care is supported by medical documentation; and
- b. 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.

<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>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</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/SSP-MOE family. Each month, data for all families receiving ongoing TANF/SSP-MOE assistance will be extracted from the FLORIDA system into a data warehouse. The family case identifier will then be used to identify all family members and caretaker relatives associated with the TANF/SSP-MOE eligible child. Whether or not an individual is designated as work-eligible can then be determined for all individuals associated with the TANF/SSP-MOE 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 will be excluded as work-eligible individuals and the method for identifying them is described as follows:</p> <ul style="list-style-type: none"> <li>• Parents who are ineligible aliens—these will be identified and designated as exempt by virtue of a specific eligibility status code currently programmed in FLORIDA.</li> <li>• 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.</li> <li>• SSI recipient—these individuals will be identified and designated as exempt by a specific eligibility status code currently programmed in FLORIDA. This status will be confirmed by their receipt of SSI benefits. Applicants for SSI <u>are not</u> excluded.</li> <li>• Parents caring for a disabled family member in their home—these individuals will be identified and designated as exempt by a specific eligibility status code currently programmed in FLORIDA.</li> <li>• At Florida option, a parent with a child under the age of three months. After the 90 days elapses, the parent is re-coded as mandatory work-eligible.</li> </ul> <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"> <li>• Fleeing felons</li> <li>• Convicted drug felons</li> <li>• Intentional program violators</li> <li>• Second and third level noncompliance individuals with protective payees for children</li> <li>• Hardship extensions if children are at risk of removal from home due to abuse or neglect</li> </ul> <p><b>Definitions</b></p> <p><b>Disabled</b>—For the purpose of 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 the purpose of 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</p>
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<p>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>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><b>Family member</b>—For the purpose of “caring for a disabled family member” policy, a family member requiring care must be within the 5<sup>th</sup> degree of kinship through blood or marriage to the caregiver.</p> <p><b>Full-time school attendance</b>—For the purpose of “caring for a disabled family member” policy, full-time school attendance shall be as determined by the school or institution.</p> <p>Currently eligibility staff have 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> <ul style="list-style-type: none"> <li>a. The correct reporting of the work participation status of all adult (or minor child head-of-household) family members, and</li> <li>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.</li> </ul>	<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, alien status, sanction status, time limit status and receipt of SSI. 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> <ul style="list-style-type: none"> <li>• Mandatory not head of household</li> <li>• Mandatory head of household</li> <li>• Mandatory SSI/SSDI pending</li> <li>• Mandatory Refugee</li> </ul> <p>b. The FLORIDA system also automatically determines whether or not 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 OSST, 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 OSST 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"> <li>Compile the work participation data items,</li> <li>Control for the rules and requirements that apply to the TANF/SSP-MOE work activities,</li> <li>Compute the average hours across all activities for the month,</li> <li>Perform edit checks and</li> <li>Control for internal consistency and completeness of the work participation data.</li> </ul> <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 hours that can be documented by DCF staff.</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 annually identifies its major performance measures and standards for each program office and tracks progress on a monthly basis through its Performance and Review Teams system (PaRTs). One of the performance measures assigned is the requirement to meet the 50% participation rate standard in the TANF program. (The 90% participation rate for two parents is now a standard for the report, as well.) When any district/region's performance on the measure falls below the standard to the degree it is identified as "red" (at risk of sanction), the district/region must conduct a gap analysis, develop counter measures and report to the entire management team at the next quarterly meeting.

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 broken out by district. The reports were sent to the district and district personnel were asked to validate their correctness or to correct any errors found. EXAMPLES: 1) A listing of all current 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, whether the family member is in school full time, 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. District personnel corrected the cases directly into the FLORIDA system participant case files.

From the findings of the PaRTs process and the ad hoc reviews, DCF developed and presented a statewide Train the Trainer session for its district 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

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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 a desk review and/or 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. Desk reviews are conducted annually. In the desk audit, system entries are reviewed. Both the on-site monitoring and desk audit include the following review elements:

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

In both the desk audit and the on-site monitoring visit, a random sample of cases is reviewed based on the total 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 is requesting alignment of Florida Statute 445.024 with the Federal Regulations regarding work activity definitions.

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

**DCF Controls**—a) In addition to developing policy manuals, procedures manuals 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 has been reassessing its Quality Assurance and Quality Control functions as a part of the on-going modernization of Florida's public assistance eligibility process for cash assistance, Medicaid and food stamps.

	<p>The following describes the levels and functions of DCF's newly proposed Quality Management System. The proposed system begins implementation February 2007. Should there be modifications to the System as it pertains to this Work Verification Plan, the Department will submit an amendment to the Plan.</p> <p>1. <u>Quality Practice Reviews at the District/Region Level (QP)</u>: Designated senior workers will sample three-to-five cases per week from 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.</p> <p>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.</p> <p>2. <u>Quality Assurance and Quality Control at the Zone Level (QA, QC)</u>: Under the management of the central program office, zone QA staffs will validate the accuracy of the QP reviews to assure consistent and appropriate review work. In addition, QA staffs will review 25 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. Zone QA personnel will participate in Accuracy Improvement Meetings and will coordinate corrective action activities.</p> <p>QC staffs will conduct a full field investigation of 1020 cases with food stamp assistance. Also, QC staff will conduct a modified QC review of an additional statistically valid sample of cases from each district to provide management with timely data on payment accuracy, enabling early intervention and corrective action. This payment accuracy review will include the review of cash assistance eligibility in cases with both food stamp and cash benefits. Zone QC personnel will also participate in Accuracy Improvement Meetings and will coordinate corrective action activities.</p> <p>3. <u>Quality Management at the State Level</u>: The Quality Management Office will monitor and manage all QC and QA work throughout the state; will analyze data generated as a result of other review levels; will look for trends that should be brought to the Department Administrative Team; will identify, validate and share performance excellence; and will coordinate, develop and maintain State corrective action plans.</p> <p>Each level of the Quality Management System will contribute 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/SSP-MOE Data Reports, the DCF Data Unit staff will examine the data for inconsistencies including an examination of hours reported. The work eligible individuals whose reported average weekly hours of participation are unusually high (more than 70 hours per week) will be identified through data queries, compiled into a list and referred 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/SSP MOE Data Report is produced using Microsoft SQL from a Data Warehouse. The Data Warehouse contains data extracted weekly, monthly and quarterly from FLORIDA and OSST. Data files are also received from Child Support Enforcement for child support payments, the Partnership for School Readiness for subsidized child care and from Family Safety for a listing of Foster Care and Board payments. 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/SSP MOE families reported on the TANF/SSP MOE 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 SSP/MOE Data Report will undergo vigorous and thorough testing. The testing will include manual checks to the data posted against the source data from OSST, 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/ SSP-MOE benefits, family affiliation codes, and counts of work participation statuses. The data from these queries will be compared to the previous report month's data and any count not within a +/- 5 percent of the previous month's counts will be manually verified. 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/SSP-MOE Data Report, a random sampling of family and person data will be obtained to verify manually that the 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 breakout 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"> <li>a. Reporting Month</li> <li>b. Stratum</li> <li>c. Case Number</li> <li>d. Disposition</li> <li>e. Type of family for work participation</li> <li>f. Amount of Food Stamps Assistance</li> <li>g. Receives subsidized childcare</li> <li>h. Amounts of TANF (and SSP-MOE) assistance</li> <li>i. Family affiliation code</li> <li>j. Non-custodial parent indicator</li> <li>k. Date of birth (adult)</li> <li>l. Relationship to head of household</li> <li>m. Parent with minor child</li> <li>n. Work-eligible individual indicator</li> <li>o. Date of birth (child)</li> </ul>	<p>As previously stated, the DCF program office’s Data Section will compile the TANF/SSP-MOE Data Report electronically. A random 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 manually verified. Since the Department will be using a tested program to compile the reports, the sample size will be at a 95% confidence level with a 15% confidence interval. To determine sample cases, a random number will be generated for each TANF/SSP-MOE family. The families will then be sorted by their random number and the number of records required by sample size will be identified.</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 elements will be added and populated when applicable: personal identifier of the disabled family member, relationship and date of birth.</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="940 893 1411 933">Data Element</th> <th data-bbox="1411 893 1787 933">Source</th> <th data-bbox="1787 893 2553 933">How Validated</th> </tr> </thead> <tbody> <tr> <td data-bbox="940 933 1411 966">Report Month</td> <td data-bbox="1411 933 1787 966">Automatically populated</td> <td data-bbox="1787 933 2553 966">Report Month Sample of cases</td> </tr> <tr> <td data-bbox="940 966 1411 998">Stratum</td> <td data-bbox="1411 966 1787 998">Florida does not use</td> <td data-bbox="1787 966 2553 998">NA</td> </tr> <tr> <td data-bbox="940 998 1411 1185">Case Number</td> <td data-bbox="1411 998 1787 1185">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 998 2553 1185">Report Month Sample of cases</td> </tr> <tr> <td data-bbox="940 1185 1411 1274">Disposition</td> <td data-bbox="1411 1185 1787 1274">Automatically populated if family does not receive any benefits</td> <td data-bbox="1787 1185 2553 1274">Report Month Sample of cases</td> </tr> <tr> <td data-bbox="940 1274 1411 1430">Family Type</td> <td data-bbox="1411 1274 1787 1430">Relationships between family members are documented and entered into the FLORIDA system. From these relationships, family</td> <td data-bbox="1787 1274 2553 1430">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
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		type is then determined using programming logic.	
Amount of Food Stamp Assistance	Individuals are matched by 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.		Report Month Sample of cases
Subsidized Child Care	Populated by matching SSN of Child against files received from outside source.		Report Month Sample and record counts
TANF/SSP-MOE 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

<p>2. Describe any procedures employed to eliminate data inconsistencies between two or more data elements.</p>	<p>The DCF will electronically compile TANF/SSP-MOE 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.</p>
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**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>

**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.**