

Department of Social & Health Services

---

P.O. Box 45010  
14<sup>th</sup> and Jefferson  
Olympia, WA 98504-5010

# **State of Washington Work Verification Plan**

*August 1, 2016*

**Table of Contents**

**I. Countable Work Activities ..... 3**

A. Unsubsidized Employment .....3

B. Subsidized Employment.....5

C. Work Experience.....7

D. On-the-job Training .....8

E.1. Job Search & Job Readiness (Employment) Assistance .....9

E.2. Job Readiness (Rehabilitation) Assistance ..... 12

F. Community Service Programs..... 14

G. Vocational Education..... 16

H. Job Skills Training ..... 18

I. Education Directly Related to Employment ..... 20

J. Secondary School/Certificate of General Equivalence ..... 21

K. Community Service Child Care (Not Currently Used)..... 22

**II. Hours Engaged in Work..... 24**

A. Excused Absences..... 24

B. FLSA Deeming ..... 25

**III. Work-Eligible Individual ..... 27**

**IV. Internal Controls..... 30**

A. Pertinent Findings ..... 30

B. Internal Controls ..... 30

**V. Verification of Other Data ..... 33**

A. Complete & Accurate Data..... 33

B. Work Participation Status ..... 34

**Appendixes..... 36**

Appendix A: Qualified Medical or Mental Health Professionals ..... 36

**Certification..... 37**

I. Countable Work Activities

*Services, Countable Hours, Verification & Daily Supervision*

## **A. Unsubsidized Employment**

### **Federal Definition of Unsubsidized Employment**

*Unsubsidized employment means full- or part-time employment in the public or private sector that is not subsidized by TANF or any other public program.*

### **Questions**

**1. Describe the services or programs the State includes under unsubsidized employment.**

Full- or part-time employment includes employment in the public or private sector that is not subsidized by TANF or any other public program, including self-employment.

**2. Describe how the State determines the number of countable hours of participation for unsubsidized employment. If the State uses different methods for different services or programs within the activity, describe each.**

The State bases countable hours of participation on the following types of verification to substantiate hours of employment, including hours for which the individual is paid, but does not work, including paid leave and paid holidays:

- Pay stubs
- Employer statement taken by a State employee by telephone or in writing. When the employer statement is obtained via a telephone call, State staff will document the pertinent information obtained from an employer's oral statement of employment hours, including the contact name, title, phone number and date of contact.
- Information from other government sources, such as the federal National Directory of New Hires or TALX (with additional verification, as required, to confirm hours of employment)
- Bank statement that shows direct deposits (with additional verification, as required, to confirm gross income and hourly rate of pay)

Any source, including verbal, written, and email statements, can be used as long as it meets the State's criteria for evaluating verification, outlined in Washington Administrative Code 388-490-0005, which requires verification to:

- Clearly relate to what the recipient is trying to prove.
- Be from a reliable source.
- Be accurate, complete and consistent.

**3. Describe how the State verifies the actual hours of participation for unsubsidized employment. Include the procedures for obtaining and maintaining documentation of hours of participation.**

Washington State Work Verification Plan  
August 1, 2016

The State will obtain the following types of verification to substantiate hours of employment and maintain documentation permanently in the form of electronically imaged documents or written documentation in our electronic eligibility or participation tracking systems:

- Pay stubs
- Employer statement taken by a State employee by telephone or in writing. When the employer statement is obtained via a telephone call, State staff will document the pertinent information obtained from an employer's oral statement of employment hours, including the contact name, title, phone number and date of contact.
- Information from other government sources, such as the federal National Directory of New Hires (with additional verification, as required, to confirm hours of employment)
- Bank statement that shows direct deposits (with additional verification, as required, to confirm gross income and hourly rate of pay)

Any source, including verbal, written, and email statements, can be used as long as it meets the State's criteria for evaluating verification, outlined in WAC 388-490-0005, which requires verification to:

- Clearly relate to what the recipient is trying to prove.
- Be from a reliable source.
- Be accurate, complete and consistent.

**4. For self-employment, describe how the State counts and verifies the 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. The State may also describe an alternative methodology to count and verify hours a client is engaged in self-employment.**

The State will count the individual's net self-employment income (verified gross income less a 50% self-employment disregard) as used to determine eligibility for TANF benefits, divided by the Federal minimum wage. An individual may choose to provide and use verified business expenses, instead of the 50% self-employment disregard, when it results in a larger disregard.

**5. If the State intends to project forward hours of participation based on current, documented, actual hours, explain how it will make this projection.**

The State reports projected hours of unsubsidized or subsidized employment or OJT for up to six months at a time on the basis of prior, documented actual hours of work. For new hires when an employer specifies a set number of hours per week which are not subject to variation as a condition of employment, the State will use employer documentation as the basis of the initial projection and will subsequently obtain documentation of actual hours at the next projection. In all other situations, the initial projection is based on at least two weeks of documented actual hours of work. This estimate will also take into account the actual hours that can be reasonably expected based on verification of the participant's current, past and expected circumstances. Staff determines if this estimate is reasonable by looking at paystubs, other documents, statements and other verification.

At the end of the six-month period, the State will obtain new valid documentation of any changes or re-verify the participant's current, actual average hours before it reports these hours for another six-month period. If, at any time, the State knows of a change in the participant's work situation, the State will adjust the hours and verify the employment hours no later than the end of the six-month period.

The State uses two methods to estimate projected actual hours of employment:

- **Anticipated Monthly Hours:** The State estimates the actual number of employment hours the participant is expected to work in the month and divides that amount by 4.33 weeks to determine the average weekly hours of employment. This method is always used for the first month of TANF. After the initial TANF month, the State may average hours of employment for the remaining months of the six-month period.
- **Averaging Hours:** If the recipient is paid weekly or every other week, the State converts this to a monthly amount and divides that amount by 4.33 weeks to determine the average weekly hours of employment. If the parent is paid:
  - Weekly, the State multiplies the hours by 4.3.
  - Every other week, the State multiplies the hours by 2.15.
  - Other than weekly or every other week, the State estimates weekly employment hours based on adding the total expected hours of employment for a period of time, dividing by the number of months in the time period and dividing by 4.33 weeks. If the participant receives yearly income over less than a year, the State will average this income over the year unless the participant is paid on an hourly or piecework basis or is a migrant/seasonal farm worker. Under WAC 388-406-0021:
    - A migrant farm worker is a person who travels away from home on a regular basis, usually with a group of other workers, to seek employment in an agriculturally related activity.
    - A seasonal farm worker is a person who does agricultural work on a farm for edible crops and is not required to be away from their permanent place of residence overnight in order to perform this work.

## **B. Subsidized Employment**

### **Federal Definitions of Subsidized Employment**

*Subsidized private sector employment means employment in the private sector for which the employer receives a subsidy from TANF or other public funds to offset some or all of the wages and costs of employing an individual.*

*Subsidized public sector employment means employment in the public sector for which the employer receives a subsidy from TANF or other public funds to offset some or all of the wages and costs of employing an individual.*

### **Questions**

- 1. Describe the services or programs the State includes under subsidized employment.**

Washington State Work Verification Plan  
August 1, 2016

Washington State has two programs that provide TANF-funded subsidized employment. The subsidy offsets all of the participant's wages. The participant is paid the state minimum wage, and receives similar benefits as an employee with no subsidy who performs similar work, the Washington State Department of Commerce acts as the employer of record and contracts with a third-party who is paid a fee to cover job development, oversight of the participant's progress and success in placing participants in unsubsidized employment.

- The Community Jobs Program provides TANF-funded subsidized employment at a public, government, non-profit or tribal agency.
- The Career Jump Program provides private sector subsidized employment with an agreement to hire, at above minimum wage with wage progression and benefits comparable to other employees, from the employer.

The State may include paid job readiness activities or other barrier removal or educational activities as part of a participant's subsidized job, and, if so, pay any costs related to providing these activities. Community Jobs and Career Jump participants may also be required to participate in other activities in addition to her or his subsidized employment. Countable hours of additional work activities will be verified and recorded in the State's electronic participation tracking system (eJAS) under the appropriate work activity.

Subsidized employment also includes college work study, which is paid employment for an educational institution.

**2. Describe how the State determines the number of countable hours of participation for subsidized employment. If the State uses different methods for different services or programs within the activity, describe each.**

See unsubsidized employment (I.A.2.) for description.

**3. Describe how the State verifies the actual hours of participation for subsidized employment. Include the procedures for obtaining and maintaining documentation of hours of participation.**

See unsubsidized employment (I.A.3.) for description.

**4. If the State intends to project forward hours of participation based on current, documented, actual hours, explain how it will make this projection.**

See unsubsidized employment (I.A.5.) for description.

**5. Describe the methods of daily supervision.**

Daily supervision means that a responsible party has daily responsibility for oversight of the individual's participation, not necessarily daily, in-person contact with the participant. The worksite supervisor provides daily supervision for the hours of subsidized employment and the third-party contractor provides additional monthly supervision to ensure the participant is doing well at the worksite and making progress towards meeting her or his employment goals. College work study is supervised by the employer in the same manner as an unsubsidized job.

## C. Work Experience

### Federal Definition of Work Experience

*Work experience (including work associated with the refurbishing of publicly assisted housing) if sufficient private sector employment is not available means a work activity, performed in return for welfare, that provides an individual with an opportunity to acquire the general skills, , knowledge, and work habits necessary to obtain employment. The purpose of work experience is to improve the employability of those who cannot find unsubsidized full-time employment. This activity must be supervised by an employer, work site sponsor, or other responsible party on an ongoing basis no less frequently than once in each day in which the individual is scheduled to participate.*

### Questions

#### 1. Describe the services or programs the State includes under work experience.

The State will administer short-term and long-term work experience opportunities to teach recipients the basics of maintaining employment and a chance to practice and expand their work skills by assigning them to unpaid work. The services will include:

- Development of the work site, making good matches of work site with parents
- Case management to ensure parents are progressing and gaining from the experience

The State will require a signed agreement between the parent, work site and program ensuring daily supervision and establishing expectations and desired outcomes.

#### 2. Describe how the State determines the number of countable hours of participation for work experience. If the State uses different methods for different services or programs within the activity, describe each.

The State will determine the number of countable hours of work experience participation based on documentation obtained from the work/training site supervisor or designee. The work/training site supervisor or designee will provide documentation in a State-approved format, such as a timesheet or form given to the employer.

All work experience participants are considered employees under the Fair Labor Standards Act (FLSA). The number of countable hours of participation for work experience is determined using the FLSA deeming provisions in Section II.B.. The State will document actual hours spent in scheduled activities to determine whether individuals have participated for the maximum number of countable hours that can be required, based on the definitions of countable activities described in the TANF regulations, and the activities described in the list above. Activities that fall within these definitions constitute countable activities.

#### 3. Describe how the State verifies the actual hours of participation for work experience. Include the procedures for obtaining and maintaining documentation of hours of participation.

The work/training site supervisor or designee will document, track and certify daily participation in a State-approved format, such as a timesheet or form given to the employer. State or contracted staff will maintain regular contact with the work/training site and verify that the parent is participating as required. The documentation is maintained for at least 30 months as history.

#### 4. Describe the methods of daily supervision.

Daily supervision means that a responsible party has daily responsibility for oversight of the individual's participation, not necessarily daily, in-person contact with the participant. The work experience work/training site must provide daily supervision for the parent and ensure the parent is participating as required, as well as meeting the training expectations agreed to. The work experience provider agrees to notify the State at any point it becomes apparent that the parent is not participating as required or has barriers to employment, such as problems with child care, that need to be addressed. State or contracted staff maintain regular contact with the work/training site, to monitor progress and to verify participation.

## **D. On-the-job Training**

### **Federal Definition of On-the-job Training**

*On-the-job training (OJT) means training in the public or private sector that is given to a paid employee while he or she is engaged in productive work and that provides knowledge and skills essential to the full and adequate performance of the job.*

### **Questions**

**1. Describe the services or programs the State includes under on-the-job training.**

On the job training provides an employee with on-site or off-site training specified by the employer to train the person for their position. The State will provide or contract for the provision of job development for the placement of TANF parents into on-the-job training jobs with private or public sector employers. Contractual agreements will be entered into with employers, parents and State regarding the length of training time, what skills the parent will obtain through the employer training, and the amount of the subsidy for the training. In addition, the agreements will include provisions for appropriate classroom or other relevant training as needed. Agreements are stored electronically for 30 months.

Support services may also be provided depending on the parents' need and the job requirements.

**2. Describe how the State determines the number of countable hours of participation for on-the-job training. If the State uses different methods for different services or programs within the activity, describe each.**

See unsubsidized employment (I.A.2.) for description.

**3. Describe how the State verifies the actual hours of participation for on-the-job training. Include the procedures for obtaining and maintaining documentation of hours of participation.**

See unsubsidized employment (I.A.3.) for description.

**4. Describe the methods of daily supervision.**

Daily supervision means that a responsible party has daily responsibility for oversight of the individual's participation, not necessarily daily, in-person contact with the participant. The employers will be required to provide daily supervision for the parent.

**5. Describe the nature of training provided by employers that distinguishes this from subsidized employment.**

OJTs will contain elements of off- or on-site training provided by the employer that relates specifically to performance of the job. The training is designed to train an individual to be able to do the job they were permanently hired to do.

**6. If the State intends to project forward hours of participation based on current, documented actual hours, explain how it will make this projection.**

See unsubsidized employment (I.A.5.) for description.

## **E.1. Job Search & Job Readiness (Employment) Assistance**

### **Federal Definition of Job Search & Job Readiness (Employment) Assistance**

*Job search and job readiness assistance means the act of seeking or obtaining employment, preparation to seek or obtain employment, including life skills training, and substance abuse treatment, mental health treatment, or rehabilitation activities. Such treatment or therapy must be determined to be necessary and documented by a qualified medical, substance abuse, or mental health professional. Job search and job readiness assistance activities must be supervised by the TANF agency or other responsible party on an ongoing basis no less frequently than once each day in which the individual is scheduled to participate.*

### **Questions**

**1. Describe the services or programs the State includes under job search and job readiness (employment) assistance.**

The job search and job readiness (employment) services include:

- Work Skill Assessment of work values, interests and work skills
- Workshops to build skills in job search competencies
  - Job interviewing
  - Applications
  - Exploring the labor market
  - Resume writing
  - Other relevant topics
- Job matching and job referrals
- Contacting employers to seek employment
- Life skills training
- Hiring events, bringing employers who are hiring together with parents who are looking for work
- Job development, business outreach activities

**2. Describe how the State determines the number of countable hours of participation for job search/job readiness (employment) assistance. If the State uses different methods for different services or programs within the activity, describe each.**

The number of countable hours of participation for job search/job readiness (employment) assistance is determined based on the definitions of countable activities described in the TANF regulations, the time an individual spends in job search and job readiness assistance traveling between multiple interviews, and the activities described in the list above. Activities that fall within these definitions constitute countable activities. Employment counselors, including counselors under contract with the Commerce Department, will conduct an in person interview with the parent to compare activity plans with the activities actually performed and recorded on an Activity/Job Search Log to determine the countable hours of participation. The State will not report hours of self-directed job search that are not documented by the parent's activity plan. Employment counselors will conduct random reviews on completed activities list on the Activity/Job Search Log for at least one percent of the cases in their office each month to confirm the accuracy of the reported information and will not report hours that are invalidated as a result of the random reviews. Parents' Activity/Job Search logs will be reviewed as part of the quality assurance case review process to identify and address any systemic data validation issues and determine how often employment counselors must conduct local random reviews. The number of required local reviews may increase over time or by location based on the results of the quality assurance case reviews.

For limited English proficient (LEP) parents, job search requirements are detailed in an employability plan for each individual. The employability plan specifies the days and number of hours of required participation. Job search participants are required to check in with their employment service provider at the beginning of each day of job search. The participant must maintain a daily log of their job search activities. The log must be provided to the employment service provider at least bi-weekly. The service provider meets with the participant regularly, and will conduct random reviews on completed activities on at least one percent of the cases in their office each month to confirm the accuracy of the reported information as described above and will not report hours that are invalidated as a result of the random reviews.

**3. Describe how the State verifies the actual hours of participation for job search/job readiness (employment) assistance. Include the procedures for obtaining and maintaining documentation of hours of participation.**

For job search/job readiness (employment) assistance parents served by the Employment Security and Commerce Departments, the employment services counselor completes an individualized activities plan listing required activities built from the list of activities and services shown above. The employment services counselor conducts scheduled in person interviews with the parent and uses the list of planned activities to verify with the parent which activities were actually performed as listed on their Activity/Job Search Log and document hours accordingly. Employment counselors will conduct random reviews on completed activities to confirm the accuracy of the reported information as described in I.E.1.2.

For limited English proficient (LEP) parents who receive employment services from providers who do not have access to an automated daily activity plan, the plan and the parent's daily log is completed on paper and stored at the employment provider's worksite for 30 months. The service provider meets with the participant regularly, and will conduct random reviews on completed activities to confirm the accuracy of the reported information as described in I.E.1.2. The actual hour information will be transmitted to State staff via the eJAS participation tracking system on a monthly basis.

**4. Describe the methods of daily supervision.**

Daily supervision means that a responsible party has daily responsibility for oversight of the individual's participation, not necessarily daily, in-person contact with the participant.

For job search/job readiness (employment) assistance parents served by the Employment Security Department, the Customer Automated Tracking System (CATS) is used to track attendance. Employment counselors under contract with the Commerce department must use a Commerce-approved system to track attendance and record absences, excused and unexcused and store attendance history for 30 months. Listed below are the some of the features of CATS:

- Parents or staff sign parents into the system CATS records attendance showing the date and time of each entry
- Records absences, excused and unexcused
- Stores attendance history for 30 months

Staff are responsible for daily supervision, including oversight of a parent's participation, although this does not necessarily mean that there will be daily contact with the parent. Daily supervision of job search may include access to an employment counselor or other employment services provider to report on progress or seek additional guidance as needed before the next regularly scheduled contact. In person contact between the employment counselor and the parent will occur on a regular basis.

For limited English proficient (LEP) parents who receive employment services from providers who do not have access to CATS:

- The LEP parent signs in with the employment provider each day
- The employment provider records absences, excused and unexcused
- The employment provider reports this information regularly to DSHS via the eJAS participation tracking system on a monthly basis
- The provider retains the documentation at their worksite for 30 months.

**5. Describe how the State ensures that 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).**

This is accomplished by computer code and logic in the programs that accumulate records of job search/job readiness activities. All hours of job search/job readiness activities, as described in I.E.1 and I.E.2., are added together and share the same durational limit and are treated as one activity for work hours, holidays and excused absences. The 6-week limit (or 12 weeks during periods of time in which the State meets the definition of a "needy state" for the contingency fund) is converted to hours, equal to 20 hours per week for a work-eligible individual who is a single custodial parent with a child under 6 years of age and 30 hours per week for all other work-eligible individuals. The code reports any records of participation in these job search and/or job readiness categories for every 5th consecutive week (if there is one) under the category "other work activities" on our TANF and SSP-MOE Data Reports. This logic will also

ensure the State stays within the limitations for applying a maximum of 120 /180 (or 240/360) hours of job search/job readiness participation in any 12-month period.

## **E.2. Job Readiness (Rehabilitation) Assistance**

### **Federal Definition of Job Search & Job Readiness (Rehabilitation) Assistance**

*Job search and job readiness assistance means the act of seeking or obtaining employment, preparation to seek or obtain employment, including life skills training, and substance abuse treatment, mental health treatment, or rehabilitation activities. Such treatment or therapy must be determined to be necessary and documented by a qualified medical, substance abuse, or mental health professional. Job search and job readiness assistance activities must be supervised by the TANF agency or other responsible party on an ongoing basis no less frequently than once each day in which the individual is scheduled to participate.*

### **Questions**

#### **1. Describe the services or programs the State includes under job search and job readiness (rehabilitation) assistance.**

If a portion of the treatment or rehabilitation activities meets a common-sense definition of another work activity, then the hours associated with the work may count under the appropriate allowable work category.

Substance abuse treatment may include:

- Detoxification services with medical care and physician supervision
- Intensive inpatient/residential treatment which is a concentrated, short-term program of individual and group counseling by a chemical dependency provider, education and activities for detoxified alcoholics/addicts and their families.
- Recovery house/residential treatment which provides a program of care and treatment, up to 60 days, with social, vocational and recreational activities to aid in patient adjustment to abstinence and to aid in job training, employment, or other types of community activities and treatment (individual and group counseling by a chemical dependency provider).
- Long-term inpatient/residential treatment which provides up to 180 days of care and treatment to chronically impaired alcoholics/addicts with impaired self-maintenance capabilities. Treatment includes education, individual and group counseling by a chemical dependency provider and the development of social and coping skills and assistance with re-entry living skills.
- Outpatient treatment which includes programs of care including individual and group treatment services of varying duration and intensity according to a prescribed plan and education regarding relapse prevention, HIV/AIDS, hepatitis B&C and sexually transmitted diseases. May also include opiate substitution treatment (e.g., Methadone).

Admission to modality of care is determined based on the American Society for Addiction Medicine (ASAM) patient placement criteria.

- *Mental health or rehabilitative services* may include medical or mental health treatment, therapy, counseling, support groups, making arrangements to obtain safe housing or

enter sheltered housing, physical therapy, services and supports to address learning disabilities and physical, mental or emotional disorders that can interfere with an individual's ability to work or look for work. These services may be provided by the Division of Vocational Rehabilitation or by qualified medical/mental health professionals. Activities may include accessing services to eliminate, circumvent, or mitigate an impediment(s) to employment, undergoing needed medical treatment, worker retraining programs, or mental health services, obtaining support services, like transportation, adaptive devices, child care, and services to family members and undergoing assessment, diagnostic and evaluation services to develop employability plans. For example, parents addressing the physical and emotional effects of past/current family violence may receive mental health or rehabilitative services to directly prepare for work by obtaining services and supports to eliminate, circumvent, or mitigate an impediment(s) to employment. Specific mental health/rehabilitative activities for these parents would include undergoing assessments, creating safety plans, participating in support groups, and obtaining required medical care or mental health services or counseling. Some of these services may be delivered by an on-site or local family/domestic violence agency.

**2. Describe how the State determines the number of countable hours of participation for job search/job readiness (rehabilitation) assistance. If the State uses different methods for different services or programs within the activity, describe each.**

The number of countable hours of participation for job search/job readiness (rehabilitation) assistance is determined based on the definitions of countable activities described in conformance with the TANF regulations, as described in the list above. Activities that fall within these definitions constitute countable activities. Department of Social and Health Services staff will determine the number of hours and types of activities completed via documentation provided by a qualified medical or mental health professional or designee, as defined in Appendix A.

**3. Describe how the State verifies the actual hours of participation for job search/job readiness (rehabilitation) assistance. Include the procedures for obtaining and maintaining documentation of hours of participation.**

The qualified medical or mental health professional or designee, as defined in Appendix A, will document that he or she is aware of what the TANF recipient is supposed to be doing on a daily basis and that the participant is doing these activities. The State will maintain documentation permanently in the form of electronically imaged documents or written documentation in our electronic eligibility or participation tracking systems.

**4. Describe the methods of daily supervision.**

Daily supervision means that a responsible party has daily responsibility for oversight of the individual's participation, not necessarily daily, in-person contact with the participant. The qualified medical or mental health professional or designee, as defined in Appendix A, may provide services directly or refer the participant for services and monitor compliance. The State will not report activities unless the provider documents that the participant received daily supervision.

**5. If the State intends to count as substance abuse treatment, mental health treatment and rehabilitation activities, describe the criteria to establish the necessity of treatment or therapy. Describe the documentation requirements for qualified medical or mental health professionals used in this process.**

- Individuals are required to participate in job readiness assistance activities when they are unable to find full-time employment and/or have health or family issues that interfere with the individual's ability to work. For these individuals, the State creates an Individual Responsibility Plan with action steps that will resolve the issue so the individual can make progress towards independence.
- A qualified medical or mental health professional, as defined on Appendix A, will document in writing that the treatment, therapy and related activities are necessary. This professional may designate another individual as qualified and responsible to provide direct services to the individual and to provide daily supervision.

**6. Describe how the State ensures that 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).**

All hours of job search/job readiness activities, as described in I.E.1. and I.E.2., are added together and share the same durational limit. See job search/job readiness (employment) assistance (I.E.1.5.) for a description of how the durational limit is applied.

## **F. Community Service Programs**

### **Federal Definition of Community Service**

*Community service programs means structured programs and embedded activities in which individuals perform work for the direct benefit of the community under the auspices of public or nonprofit 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 child care. Community service programs are designed to improve the employability of individuals not otherwise able to obtain full-time employment, and must be supervised on an ongoing basis no less frequently than once each day in which the individual is scheduled to participate. A State agency shall take into account, to the extent possible, the prior training, experience, and skills of a recipient in making appropriate community service assignments.*

### **Questions**

**1. Describe the services or programs the State includes under community service.**

The State's Community Service program is an activity in which TANF recipients perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. The program is designed to improve the employability (that is, work skills and improve work habits) of recipients not otherwise able to obtain employment or full-time employment. The State's Community Service program may include training or similar activities that are needed to perform the volunteer work.

**2. Describe how the State determines the number of countable hours of participation for community service. If the State uses different methods for different services or programs within the activity, describe each.**

Community service providers and program participant report actual hours of participation in a State-approved format, such as time sheets and activity logs that report hours of participation for every day of every week in each month.

The number of countable hours of participation will be determined using the FLSA deeming provisions in Section II.B. The State will document actual hours spent in scheduled activities to determine whether individuals have participated for the maximum number of countable hours that can be required, based on the definitions of countable activities described in the TANF regulations, and the activities described above. Activities that fall within these definitions constitute countable activities.

**3. Describe how the State verifies the actual hours of participation for community service. Include the procedures for obtaining and maintaining documentation of hours of participation.**

The volunteer work/training site supervisor or designee will document, track and certify daily participation in a State-approved format, such as a timesheet or form given to the volunteer organization. State or contracted staff will maintain regular contact with the volunteer work/training site and verify that the parent is participating as required. The documentation will be maintained for at least 30 months as history.

**4. Describe the methods of daily supervision.**

Daily supervision means that a responsible party has daily responsibility for oversight of the individual's participation, not necessarily daily, in-person contact with the participant. The volunteer work/training site must provide daily supervision for the recipient and ensure the recipient is participating as required, as well as meeting the agreed-upon work skills and training expectations. State or contracted staff will maintain regular contact with the volunteer work/training site, to monitor progress and to verify participation. Contracted staff will notify the State at any point it becomes apparent that the parent is not participating as required or has barriers to employment, such as problems with child care, that need to be addressed.

**5. 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.**

All community service program participants are considered employees under FLSA.

**6. If the State permits self-initiated community service positions, describe how it determines that the position provides a direct community service and improves the recipient's employability.**

The State will permit self-initiated community service positions with established public or non-profit organizations that provide a direct community service, such as food banks or volunteer organizations. These volunteer opportunities will improve a recipient's employability by providing a chance to perform work, to learn new work skills or habits and to increase self-esteem by contributing to the community.

## **G. Vocational Education**

### **Federal Definition of Vocational Education**

*Vocational education (not to exceed 12 months with respect to any individual) means organized educational programs that are directly related to the preparation of individuals for employment in current or emerging occupations. Vocational educational training must be supervised on an ongoing basis no less frequently than once in each day the individual is scheduled to participate.*

### **Questions**

#### **1. Describe the services or programs the State includes under vocational education.**

Vocational education is training that leads to a certificate in a specific occupation or a degree and may include:

- Basic education, such as adult basic education (ABE) or English as a second language (ESL) training when deemed a necessary and required part of the program including ESL that is needed to become employable or to become ready to participate in other work activities provided in classes that are geared to workplace language proficiency;
- Remedial/developmental education and prerequisites deemed a necessary and required part of the program; and

Total homework time, not to exceed the hours required or advised by the educational program, including supervised homework and study activities and up to one hour of unsupervised homework time for each hour of class time. Vocational education may be offered by accredited organizations that meet the WorkFirst program's standards for service providers:

- Public and private technical colleges or schools;
- Community colleges; or
- Tribal colleges.

#### **2. Describe how the State determines the number of countable hours of participation for vocational education. If the State uses different methods for different services or programs within the activity, describe each.**

The number of countable hours of participation is determined based on the definitions of countable activities described in the TANF regulations, and the activities described above. Activities that fall within these definitions constitute countable activities. College/educational provider program staff will use the number of hours spent in the classroom and doing homework and study hall activities to determine the countable hours of participation.

#### **3. Describe how the State verifies the actual hours of participation for vocational education. Include the procedures for obtaining and maintaining documentation of hours of participation.**

The method of verification of actual hours may vary by instructional provider. For instructional activities, documentation will be provided in a State-approved format, such as classroom attendance sheets, individual timesheets signed by the faculty member, supervisor, or other appropriate individual as well as the student or documented in electronic tracking systems, as appropriate. Attendance records will be documented and maintained in the college's students' files. For homework time, the college or provider will document the homework or study

expectations of the educational program and retain a copy in the student's files. The documentation will be maintained for at least 30 months as history.

**4. Describe the methods of daily supervision.**

Daily supervision means that a responsible party has daily responsibility for oversight of the individual's participation, not necessarily daily, in-person contact with the participant. Faculty, instructors, instructional aides, lab supervisors, study hall supervisors, and supervisors of work-based learning activities provide daily supervision for the hours of vocational education. College program designees also provide additional monthly supervision to ensure the participant is doing well in his or her program and making progress towards meeting her or his educational and employment goals.

For accredited Internet-based Education and Distance Learning, participation is counted toward participation when access to vocational education training, in general or a specific skill course of study, is limited or non-existent. This may include accommodations for individuals with disabilities and parents caring for a family member with disabilities. Supervision of said activities will be carried out in accordance with established policies and protocols. In the event that internet access takes place at the individual's home, supervision of class participation will be monitored through course software. Otherwise, the State will follow the educational institutions' guidelines for course completion to include instructor monitoring of actual (not scheduled or expected) hours of participation, verification of student assignment completion, monitoring of e-mail discussion boards, and tests to determine a grade.

**5. 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.**

The State counts hours in work activity components that correspond to the federal definition of vocational education training. Hours are counted for participants who are receiving TANF assistance at the time they were active in this component, and to only count hours in the first 12 months that met the above conditions in or after August, 1997.

This is accomplished by logic and computer code in automated programs that accumulate permanent records of each participant's participation in work activities, including vocational education training activities. The State retains information about each participant's participation in vocational education permanently, so we can ensure participants do not exceed their 12-month lifetime limit for vocational education. The State will also retain documentation and verification of the actual hours of participation, as described in I.G.3. above, but this type of documentation is held separately by the partner agencies and will be stored for at least 30 months.

**6. Explain how the State will ensure that basic and remedial education and English as a Second Language (ESL), if such activities are counted, are of a necessary or regular part of the vocational education training.**

Each vocational education program has clearly documented entry requirements designed to ensure student success. These requirements are a necessary and regular part of the vocational training. Educational Advisors will refer to these requirements before enrolling students in vocational education to ensure that the preparatory activities are of appropriate duration.

In addition, the State may place recipients in programs which integrate basic skills with vocational education. Termed *Integrated Basic Education and Skills Training (I-BEST)*, these programs integrate basic education throughout the entire program.

Integrated Basic Education and Skills Training (I-BEST) programs are vocational programs which embed Basic Education in the curriculum. A minimum of 50% overlap of instruction by two faculty members (an ABE instructor and a professional/technical instructor teaching concurrently) is required for programs to be designated as I-BEST programs. These programs are specifically designed for students who have been determined to have a Basic Education deficit.

The determination of a need for language or literacy instruction is made using the Comprehensive Adult Student Assessment System (CASAS). The use of this standardized assessment tool is required by the Washington State Board for Community & Technical Colleges' Adult Basic Education Office.

## **H. Job Skills Training**

### **Federal Definition of Job Skills Training**

*Job skills training directly related to employment means training or education 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. Job skills training directly related to employment must be supervised on an ongoing basis no less frequently than once in each day the individual is scheduled to participate.*

### **Questions**

#### **1. Describe the services or programs the State includes under job skills training.**

Job skills training is training or education 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 to include vocational education and courses required for program entry.

Activities may include:

- Customized training programs to meet the needs of a specific employer;
- General training that prepares an individual for employment to include vocational education and courses explicitly required for program entry;
- Pre-employment training designed to provide the skills students need for an identified entry level job that pays more than average entry level wages;
- Basic education, including classes to prepare for general equivalency diploma (GED), testing to acquire GED certification, adult basic education (ABE) or English as a second language (ESL) training when such instruction is focused on skills needed for employment, combined in a unified whole with job training, or needed to enable the parent to perform a specific job or engage in a specific job training program;
- Four-year bachelor degree programs at any State certified college or university; and,

- Total homework time, not to exceed the hours required or advised by the educational program, including supervised homework and study activities and up to one hour of unsupervised homework time for each hour of class time.

**2. Describe how the State determines the number of countable hours of participation for job skills training. If the State uses different methods for different services or programs within the activity, describe each.**

The number of countable hours of participation is determined based on the definitions of countable activities described in the TANF regulations, and the activities described above. Activities that fall within these definitions constitute countable activities. College/educational provider program staff will use the number of hours spent in the classroom and doing homework and study activities to determine the countable hours of participation.

**3. Describe how the State verifies the actual hours of participation for job skills training. Include the procedures for obtaining and maintaining documentation of hours of participation.**

The method of verification of actual hours may vary by instructional provider. For instructional activities, documentation will be provided in a State-approved format, such as classroom attendance sheets, individual timesheets signed by the faculty member, supervisor, or other appropriate individual as well as the student or documented in electronic tracking systems, as appropriate. Attendance records will be documented and maintained in the college's or provider's students' files. For homework time, the college or provider will document the homework or study expectations of the educational program and retain a copy in the student's files. The documentation will be maintained for at least 30 months as history.

**4. Describe the methods of daily supervision.**

Daily supervision means that a responsible party has daily responsibility for oversight of the individual's participation, not necessarily daily, in-person contact with the participant. Faculty, instructors, instructional aides, lab supervisors, study supervisors, and supervisors of work-based learning activities provide daily supervision for the hours of education. College program designees also provide additional monthly supervision to ensure the participant is doing well in his or her program and making progress towards meeting her or his educational and employment goals.

For accredited Internet-based Education and Distance Learning, participation is counted toward participation when access to vocational education training, in general or a specific skill course of study, is limited or non-existent. This may include accommodations for individuals with disabilities and parents caring for a family member with disabilities. Supervision of said activities will be carried out in accordance with established policies and protocols. In the event that internet access takes place at the individual's home, supervision of class participation will be monitored through course software. Otherwise, the State will follow the educational institutions' guidelines for course completion to include instructor monitoring of actual (not scheduled or expected) hours of participation, verification of student assignment completion, monitoring of e-mail discussion boards, and tests to determine a grade.

## **I. Education Directly Related to Employment**

### **Federal Definition of Education Directly Related to Employment**

*Education directly related to employment, in the case of a recipient who has not received a high school diploma or a certificate of high school equivalency means education related to a specific occupation, job, or job offer. Education directly related to employment must be supervised on an ongoing basis no less frequently than once in each day the work-eligible individual is scheduled to participate.*

### **Questions**

**1. Describe the services or programs the State includes under education directly related to employment.**

Education directly related to employment activities include:

- Classes to prepare for general equivalency diploma (GED);
- Testing to acquire GED certification
- Adult basic education (ABE);
- English as a second language (ESL) training, and;
- Total homework time, not to exceed the hours required or advised by the educational program, including supervised homework and study activities and up to one hour of unsupervised homework time for each hour of class time.

Education directly related to employment may be provided to limited-English proficient participants who either cannot produce or do not possess an education that is recognized by United States employers as equivalent to a high school/GED obtained in this country.

**2. Describe how the State determines the number of countable hours of participation for education directly related to employment. If the State uses different methods for different services or programs within the activity, describe each.**

The number of countable hours of participation is determined based on the definitions of countable activities described in the TANF regulations, and the activities described above. Activities that fall within these definitions constitute countable activities. College/educational provider program staff will use the number of hours spent in the classroom and doing homework and study activities to determine the countable hours of participation.

**3. Describe how the State verifies the actual hours of participation for education directly related to employment. Include the procedures for obtaining and maintaining documentation of hours of participation.**

The method of verification of actual hours may vary by instructional provider. For instructional activities, documentation will be provided in a State-approved format, such as classroom attendance sheets, individual timesheets signed by the faculty member, supervisor, or other appropriate individual as well as the student or documented in electronic tracking systems, as appropriate. Attendance records will be documented and maintained in the college's or provider's students' files. For homework time, the college or provider will document the homework or study expectations of the educational program and retain a copy in the student's files. The documentation will be maintained for at least 30 months as history.

**4. Describe the methods of daily supervision.**

Daily supervision means that a responsible party has daily responsibility for oversight of the individual's participation, not necessarily daily, in-person contact with the participant. Faculty, instructors, instructional aides, lab supervisors, study hall supervisors, and supervisors of work-based learning activities provide daily supervision for the hours of education. College program designees also provide additional monthly supervision to ensure the participant is doing well in his or her program and making progress towards meeting her or his educational and employment goals.

For accredited Internet-based Education and Distance Learning, participation is counted toward participation when access to vocational education training, in general or a specific skill course of study, is limited or non-existent. This may include accommodations for individuals with disabilities and parents caring for a family member with disabilities. Supervision of said activities will be carried out in accordance with established policies and protocols. In the event that internet access takes place at the individual's home, supervision of class participation will be monitored through course software. Otherwise, the State will follow the educational institutions' guidelines for course completion to include instructor monitoring of actual (not scheduled or expected) hours of participation, verification of student assignment completion, monitoring of e-mail discussion boards, and tests to determine a grade.

## **J. Secondary School/Certificate of General Equivalence**

### **Federal Definition of Secondary School/GED**

*Satisfactory attendance at secondary school or in a course of study leading to a certificate of general equivalence, in the case of a recipient who has not completed secondary school or received such a certificate means regular attendance, in accordance with the requirements of the secondary school or course of study, at a secondary school or in a course of study leading to a certificate of general equivalence, in the case of a work-eligible individual who has not completed secondary school or received such a certificate. This activity must be supervised on an ongoing basis no less frequently than once in each day the individual is scheduled to participate.*

### **Questions**

#### **1. Describe the services or programs the State includes under secondary school/GED.**

Secondary school/GED activities include:

- High school completion classes;
- Classes to prepare for general equivalency diploma (GED);
- Testing to acquire GED certification;
- This activity may be provided to participants who either cannot produce or do not possess an education that is recognized by United States employers as equivalent to a high school/GED obtained in this country and include language instruction as needed to complete the course work, and;
- Total homework time, not to exceed the hours required or advised by the educational program, including supervised homework and study activities and up to one hour of unsupervised homework time for each hour of class time.

**2. Describe how the State determines the number of countable hours of participation for secondary school/GED. If the State uses different methods for different services or programs within the activity, describe each.**

The number of countable hours of participation is determined based on the definitions of countable activities described in the TANF regulations, and the activities described above. Activities that fall within these definitions constitute countable activities. College/educational provider program staff will use the number of hours spent in the classroom and doing homework and study activities to determine the countable hours of participation.

**3. Describe how the State verifies the actual hours of participation for secondary school/GED. Include the procedures for obtaining and maintaining documentation of hours of participation.**

The method of verification of actual hours may vary by instructional provider. For instructional activities, documentation will be provided in a State-approved format, such as classroom attendance sheets, individual timesheets signed by the faculty member, supervisor, or other appropriate individual as well as the student or documented in electronic tracking systems, as appropriate. Attendance records will be documented and maintained in the college's or provider's students' files. For homework time, the college or provider will document the homework or study expectations of the educational program and retain a copy in the student's files. The documentation will be maintained for at least 30 months as history.

**4. Describe the methods of daily supervision.**

Daily supervision means that a responsible party has daily responsibility for oversight of the individual's participation, not necessarily daily, in-person contact with the participant. Faculty, instructors, instructional aides, lab supervisors, study hall supervisors, and supervisors of work-based learning activities provide daily supervision for the hours of education. College program designees also provide additional monthly supervision to ensure the participant is doing well in his or her program and making progress towards meeting her or his educational and employment goals.

For accredited Internet-based Education and Distance Learning, participation is counted toward participation when access to vocational education training, in general or a specific skill course of study, is limited or non-existent. This may include accommodations for individuals with disabilities and parents caring for a family member with disabilities. Supervision of said activities will be carried out in accordance with established policies and protocols. In the event that internet access takes place at the individual's home, supervision of class participation will be monitored through course software. Otherwise, the State will follow the educational institutions' guidelines for course completion to include instructor monitoring of actual (not scheduled or expected) hours of participation, verification of student assignment completion, monitoring of e-mail discussion boards, and tests to determine a grade.

## **K. Community Service Child Care (Not Currently Used)**

### **Federal Definition of Community Service Child Care**

*Providing child care services to an individual who is participating in a community service program means providing child care to enable another TANF or SSP recipient to participate in a community service program. This is an unpaid activity and must be a structured program designed to improve*

*the employability of individuals who participate in this activity. This activity must be supervised on an ongoing basis no less frequently than once in each day the individual is scheduled to participate.*

### **Questions**

- 1. Describe the services or programs the State includes under community service child care.**

Not used.

- 2. Describe how the State determines the number of countable hours of participation for community service child care. If the State uses different methods for different services or programs within the activity, describe each.**

Not used

- 3. Describe how the State verifies the actual hours of participation for community service child care. Include the procedures for obtaining and maintaining documentation of hours of participation.**

Not used

- 4. Describe the methods of daily supervision.**

Not used

## II. Hours Engaged in Work

### *Excused Absences & Deeming*

#### A. Excused Absences

##### Questions

- 1. Describe the State's excused absence policies for unpaid work activities. This includes its policies for holidays as well as the additional 80 hours of excused absences that the State may count in a 12-month period.**

The State will count reasonable short-term, excused absences, as defined below, for hours missed due to a maximum of 10 holidays in any 12-month period and a maximum of an additional 80 hours of excused absences in any 12-month period, no more than 16 of which may occur in a month. The State will use specific computer logic designed for this purpose within its automated systems to apply these absences on an hourly basis, not to exceed the hours the individual was scheduled to participate. This logic will also ensure the State stays within the limitations for applying a maximum of 10 holidays and an additional 80 hours of excused absences in the preceding 12-month period. The State will count holidays and excused absences that occur during hours an individual was scheduled to participate, including holidays that fall between the scheduled start and end date of an allowable work activity that the State reports as participation.

State staff and contractors will input most excused absences into the State's automated systems on at least a monthly basis. The State will use specific computer logic designed for this purpose to apply state holidays provided for state staff, as defined in RCW 1.16.050, to recipients in allowable work activities.

- **Holidays:** The State defines "holidays" as the paid holidays provided for state staff as defined in RCW 1.16.050, excluding the first listed legal holiday "Sunday".

*RCW 1.16.050: The following are legal holidays: Sunday; the first day of January, commonly called New Year's Day; the third Monday of January, being celebrated as the anniversary of the birth of Martin Luther King, Jr.; the third Monday of February to be known as Presidents' Day and to be celebrated as the anniversary of the births of Abraham Lincoln and George Washington; the last Monday of May, commonly known as Memorial Day; the fourth day of July, being the anniversary of the Declaration of Independence; the first Monday in September, to be known as Labor Day; the eleventh day of November, to be known as Veterans' Day; the fourth Thursday in November, to be known as Thanksgiving Day; the day immediately following Thanksgiving Day; and the twenty-fifth day of December, commonly called Christmas Day. Whenever any legal holiday, other than Sunday, falls upon a Sunday, the following Monday shall be the legal holiday. Whenever any legal holiday falls upon a Saturday, the preceding Friday shall be the legal holiday.*

- **Excused absences:** The State defines the WorkFirst "excused absence" policy in Washington Administrative Code 388-310-0500(5) and (6), which states:
  - An individual may be given an excused absence when the individual is unable to attend a required WorkFirst appointment or activity.

- To get an excused absence, the individual must call the provider to explain the situation on or before the day the individual was to report when possible, or as soon as possible thereafter. If the individual is able, but does not call in to get an excused absence, it will be considered an unexcused absence.

**2. If the policies vary by work activity, The State should describe how they vary and for which activities.**

The policy does not vary by unpaid work activities.

## **B. FLSA Deeming**

### **Questions**

**1. If the State wishes to use the "deeming" provision permitted at 261.31 and 261.32 for work experience or community service programs, describe how the State determines the work hours requirement, including how the monthly TANF grant and food stamp allotment are combined and divided by the appropriate minimum wage to meet the "core" participation requirement.**

The State will use the following methodology to determine the maximum number of hours per month that the State may require for work experience or community service activities that are subject to the Fair Labor Standards Act (FLSA). FLSA applies to all of the State's community service and work experience activities.

The state combines the TANF grant with the food stamp allotment to determine the combined allotment. The combined allotment is then divided by the state or local minimum wage, whichever is higher, to determine the maximum monthly hours the State may require for work experience or community service activities that are subject to FLSA. Effective October 1, 2015, the state will use the state or any local minimum wage mandated by local ordinances, whichever is higher, as required under 29 U.S.C. 218(a) and RCW 49.46.120. For the purposes of FLSA deeming, DSHS will be considered an employer.

The state minimum wage is currently \$9.47 an hour. The Washington State Department of Labor and Industries re-calculates the state minimum wage each September based on the federal "CP-W" index to be effective January 1<sup>st</sup> of the following year.

- When determining hours for a work-eligible individual in the all-family rate, the State will consider a work-eligible individual who participates the maximum number of hours per month the State may require in a work experience or community service program that is subject to FLSA to have participated 20 hours per week if actual participation falls short of 20 hours per week.
- When determining hours for a family with two work-eligible parents for the two-parent rate, the State will consider a family in which one or both parents participate the maximum number of hours per month the State may require in a work experience or community service program to have participated 30 or 50 hours per week if actual participation falls short of 30 or 50 hours per week.

The State will use specific computer logic designed for this purpose within its automated systems to calculate and display the maximum community service or work experience hours the State may require to State staff and contractors. State and contracted staff will require participation accordingly and input actual hours of community service and work experience participation into

Washington State Work Verification Plan  
August 1, 2016

the State's automated system on a monthly basis. Deeming only applies to the extent a work-eligible parent participates the maximum hours permitted under the FLSA minimum wage provision, specific computer logic designed for this purpose will claim and report additional deemed hours of community service and work experience participation up to the applicable core activity requirement for the work-eligible parent.

- 2. Include a statement certifying that the State has adopted a "mini" Simplified Food Stamp Program in order to count the value of food stamp benefits. The Food and Nutrition Service has indicated that a TANF work experience or community service program can serve as the Food Stamp Workfare Program, which would otherwise be required before a State could combine the food stamp allotment to calculate the hours required.**

The State of Washington certifies that it adopted a "mini" Simplified Food Stamp Program effective January 1, 2007.

- 3. If State policies or procedures differ for work experience and community service programs on FLSA deeming the State should make those differences clear.**

The State will use the same FLSA deeming policies and procedures for work experience and community service programs that are subject to the FLSA minimum wage requirement.

## III. Work-Eligible Individual

### *Identification, Verification & Procedures*

#### **Federal Definition of Work-Eligible Individual**

*Work-eligible individual* means an adult (or minor child head-of-household) receiving assistance under TANF or a separate State program or a **non-recipient parent** living with a child receiving assistance. The definition excludes the following non-recipient parents:

- A minor parent who is not the head-of-household
- A non-citizen who is ineligible to receive assistance due to his or her immigration status; or
- At State option, on a case-by-case basis, a recipient of Supplemental Security Income (SSI) benefits.

The term also excludes some parents whether they are recipients or not:

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

#### **Questions**

- 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.**

All adult recipients of assistance and any non-recipient parents living with a dependent child receiving assistance are considered work-eligible individuals, with the following exceptions:

- Minor parents who are not the head of household.
- Non-citizens who do not qualify for assistance due to their immigration status.
- Parents caring for a disabled family member in the home as defined in III.2.
- At state option on a case by case basis, Supplemental Security Income (SSI) and Social Security Disability Insurance (SSDI) recipients.
- Non-needy caretaker relatives who do not receive assistance and are not the parent of any child who is receiving assistance.

The State determines the work eligibility status of individuals based on appropriate verification obtained during the eligibility determination process. Verified data, such as receipt of disability benefits and the relationship of the adult to the children in the home, is entered into the ACES system (Washington's eligibility system). Case managers enter a specific work exemption code into the State's participation tracking system (eJAS) to identify parents who are exempt from

participation in work activities because they are caring for a disabled family member as defined in III.2.

Pertinent ACES and eJAS data are downloaded and cross-tabulated into a data processing program which uses explicit coded logic to identify work-eligible individuals and map ACES/eJAS codes to the corresponding work eligible Federal Reporting data elements.

The State will identify work-eligible adults (or minor child head-of-households) based on verified data in the State's automated systems in the following order:

- **Category 1:** An adult (or minor child head-of household) receiving assistance
- **Categories 7 through 9:** Non-work eligible adults (parent caring for a disabled family member in the home, non-citizen due to immigration status, parent receiving SSDI or a non-recipient parent receiving SSI)
- **Categories 5 and 6:** Non-recipient adults will be categorized as work-eligible (a non-recipient parent found ineligible for TANF due to other reasons) or not work-eligible (as the non-recipient head of household is not a parent).

The State will not use categories 2 through 4 as it will not exercise its option to include non-recipient parents receiving SSI and State policy does not remove parents from the assistance unit due to sanction or time limits.

2. **The State should also describe its procedures for identifying a parent caring for a disabled family member, who may also be excluded from the definition of a work-eligible individual. The procedures should define the terms "disabled," and "family member". This should include a means of ensuring that the need for care in the home is supported by medical documentation and describe the nature of the medical documentation used to make such determinations. If the State includes in this group parents caring for a family member with a temporary disability, the State must describe its procedures for determining when the family member is no longer disabled and ensuring that the parent is then identified as a work-eligible individual.**

The State will define a parent as not work-eligible under the following conditions:

- The parent is required to stay home to care for a child who is a family member with a special medical, developmental, mental or behavioral condition who requires specialized care or treatment that significantly interferes with the parent's ability to look for work or work as determined by a social worker, public health nurse, physician, mental health provider, school professional, other medical professional, Home and Community Services, the Mental Health Division or Regional Support Network.
- The parent is required to be in the home to care for another adult family member with disabilities who cannot be left alone for significant periods of time when no other adult is available and able to provide the care and the adult with the disability is related to the parent. The disabled adult's disability must be verified by documentation from the Developmental Disability Division, the Division of Vocational Rehabilitation, Home and Community Services, the Mental Health Division, the Regional Support Network or with evidence from another medical or mental health professional as defined in Appendix A of this plan.
- Family member: A family member is the child in the home or a relative of specified degree with whom a child lives if this relative exercises responsibility for the care and control of the child. The State defines the following relatives as a relative of specified degree: The child's parent (natural, stepparent, or adoptive) or other relative (blood,

step sibling, natural parent as a non-parental relative when the parental relationship has been terminated by adoption, or the stepparent when the stepparent relationship has been terminated by death, of the natural or adoptive parent, or by divorce, or by an order of the court terminating stepparent liability). Family member also includes a court-ordered guardian, court-ordered custodian, or other adult standing in loco parentis to the child in the home.

For temporary disabilities, the State will document the expected duration of the disability and only approve the parent staying home to care for the disabled family member for that period of time. At the end of that time period, the State will request additional verification if it appears that the family member will require additional home care.

**3. 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:**

- **The correct reporting of the Work Participation Status of all adult (or minor child head-of-household) family members, and**
- **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.**

The State will verify each individual's eligibility status using the State's current procedures for establishing eligibility for TANF cash aid and food assistance benefits. See internal controls (IV.B.1.) for a description of the State's quality assurance process that will be used to confirm the accuracy of this data.

Work Participation Status is derived from data from the ACES system (Washington's eligibility system) using explicit coded logic. This produces the data for the Work Participation data element in the current reporting (Reporting Item 48). This data is not entered directly by caseworkers—only derived from data they enter into the system for other purposes.

Whether a family should be included in the overall or also in the two parent rate is derived from data elsewhere in the reporting file – by referring to data elements for Family Affiliation, Relationship to Head of Household, receipt of disability benefits and number of adults in the household who receive assistance. This is derived from coded logic, not input directly by staff.

**4. 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.**

State agency staff and contracted providers are responsible to accurately input actual countable hours of participation that conform with federal definitions into Washington State's electronic tracking system (eJAS) each month. See internal controls (IV.B.1.) for a description of the State's quality assurance process and contract monitoring that will be used to confirm the accuracy of this data.

Countable hours reported for work activities are accumulated by computer code accessing the actual hour data in Washington's automated systems. The code accumulates hours into Federal reporting categories using crosswalks maintained by program policy staff. The crosswalks map the state work participation activity codes to the Federal Reporting data elements.

## IV. Internal Controls

*Findings, Procedures & System/Programming Errors*

### A. Pertinent Findings

The State will maintain all pertinent findings produced through its internal control processes and these findings will be available for use by ACF and other auditors in their review of the State's work participation verification system.

### B. Internal Controls

If the State is phasing in procedures or internal controls, describe the phase-in. All procedures were in place by September 30, 2007.

#### Questions

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

State staff and contractors document participation and enter verified data into the State's automated systems on a real-time basis. Edits and warning messages prevent the user from entering invalid dates and data types. Required fields must be completed before the data can be committed.

Monthly data files are extracted to the ACES data Warehouse according to an established schedule on or near the last day of the month. The ACES Data Warehouse compiles report data from specifically listed fields into tables. Designated State Research and Data Analysis (RDA) staff access these tables and obtain information from additional automated systems, as required, to format and transmit required reporting files to the Administration for Children and Families on a quarterly basis. See IV.B.3. for additional details on the State's edit and consistency protocols to ensure that all work participation report items are internally consistent.

The State will use the following types of internal controls to determine whether work verification procedures are properly being employed:

- **Quality Assurance Process:** The State uses a quality assurance process, using a statistically valid sample (as described in IV.B.4.) of all cases with an active TANF recipient to review cases, determine causes and initiate corrective action for staff and/or system errors. The process includes monthly meetings with headquarters, information technology and field staff to review potential problem cases from case reviews and identify ways in which discrepancies may be eliminated. Another focus of the monthly meetings is to identify discrepancy-prone cases, policy or automation issues and staff training needs.

Case reviews or ongoing samples will assure that data in Washington State's automated eligibility and participation tracking systems correspond to reported data. During case reviews, State staff (who are not field or contract staff responsible to enter participation or other required data into the automated systems) reviews cases to determine whether:

- Reported activities met the federal definitions and were reported under the correct category.
- Staff entered the correct number of hours of participation and have sufficient documentation to substantiate the actual hours of participation.
- Policies and procedures, such as the excused absence or FLSA deeming policies, were correctly applied.

The State also uses a defined protocol for detecting potential errors, correcting conditions that may lead to future errors and correcting data errors and inconsistencies for future months' transmissions to HHS. The State uses data accuracy initiatives to assess whether data is free of data input errors and omissions and to eliminate factors that may generate errors. These initiatives will likely change over time based on root causes or errors identified by case reviews. The initiatives focus on reducing data input discrepancies and identifying potential system errors. For example, the initiatives may validate data produced by the States' automated systems such as the self-employment calculation used to determine the hours of self-employment based on net business income.

- **Contract monitoring** is used to determine whether providers are meeting contractual supervision and documentation requirements and providing accurate and timely reporting of actual hours of participation each month in Washington State's electronic tracking system (eJAS). Contracts are structured to allow withholding of payment if the contractor does not meet work verification requirements as described in the contract.
- **Data integrity:** The State builds on current system controls to identify system and programming errors and validate reporting data used in the TANF federal report. The State may conduct focused reviews on significant areas of concern that emerge from its quality assurance case reviews and process. These focus reviews will determine causes, such as data systems constraints or State staff and contractor practices and be used to take appropriate corrective action.
- **Policy and Training:** The State will develop training and manual materials to describe new processes and federal requirements so staff and contracted providers are able to correctly apply work verification requirements.

**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 (e.g., 70 or more hours per week) by examining the documentation used to support those hours.**

For the online system (eJAS), edits and warning messages prevent the user from entering invalid dates and data types. Required fields must be completed before the data can be committed.

Workers manage their caseloads by using both the real-time and daily Caseload Management Report to track clients' participation and process cases when action is required. There is also a feature in

the eJAS system that show when a parent is not participating, not progressing or has multiple unexcused absences.

There are a series of automated checks and balances in place to ensure that captured data is accurately reported. See also internal controls (IV.B.1.) for a description of the State's quality assurance process that will be used to confirm that staff is correctly following procedures and providing accurate data.

- 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 into 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 result to what the State actually reported to HHS.**

All report data is processed from specifically listed fields in the ACES Data Warehouse:

- Many data elements are subject to valid values defined within the system.
  - To maintain checks and balances, work activities are mapped to Federal Reporting Elements per explicit direction to information technology staff (who are neither program representatives, nor the organization that submits the reporting files).
  - Explicit "Automated Work Requests" (AWR) are needed before IT staff revise the computer code. These are signed off by both the Economic Services Administration and RDA before work starts.
  - Employment and work activity hours are entered into the automated systems of record directly by field or contract staff. This data is extracted to the ACES Data Warehouse monthly per an existing approved and tested AWR.
  - Work participation report data is not changed at RDA.
  - Computer code changes are tested by RDA before being accepted to the production processing that creates monthly data files.
  - AWR acceptance tests include accuracy of the data accessed, accuracy of the data transformations and correspondence to stated requirements.
- 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.**

For the purposes of drawing samples to review cases for accuracy, the sample size will be large enough to provide a precision of plus or minus five percentage points at a 90 percent confidence level. We draw a systematic random sample of cases per month drawn from a universe of cases with an active TANF recipient gathered from ACES to verify the accuracy and consistency of work participation and verification information used to calculate Washington's participation rates.

# V. Verification of Other Data

## *Data Accuracy & Work Participation Status*

### **A. Complete & Accurate Data**

**Under the “complete and accurate” standard for data reporting, the State should validate all data submitted in its TANF Data Report and, if applicable, the SSP-MOE Data Report. In addition to the work activities, the following data elements are used in calculating the work participation rates.**

- Reporting Month. The reporting month is coded from the benefit month represented by the report file. This has an extremely low possibility of error.
- Stratum. Since Washington reports the universe, not a sample, there is only one stratum—a hard coded value (we use '20'). This has an extremely low possibility of error.
- Case Number. Case Number (Assistance Unit ID) is a key to organization of Washington State's eligibility system. This has an extremely low possibility of error.
- Disposition. Washington draws the population data representing the cases active in the reporting month for the reporting month. This is the full caseload. There is no “listing in error” in that system and this reporting element is always coded as “1” (included in the report).
- Type of Family for Work Participation.
- Amount of Food Stamps Assistance.
- Receives Subsidized Child Care.
- Amounts of TANF (and SSP-MOE) Assistance.
- Family Affiliation Code.
- Non-custodial Parent Indicator.
- Date of Birth (Adult).
- Relationship to Head-of-Household.
- Parent with Minor Child.
- Work-Eligible Individual Indicator.
- Date of Birth (Child).
- Holidays and Excused Absences per federal instructions.
- Deemed Core Hours per week for the Overall Rate.
- Deemed Core Hours for the Two-Parent Rate.

Washington creates a preview tabulating the frequency distribution of each of the above reporting elements each month. These are examined by the reporting unit (RDA) and distributed to program area staff and executives for review. In addition, all feedback of questionable values, missing data and consistency checks distributed by ACF are reviewed systematically, including a review of this feedback as part of the State's internal control system, described in IV.B.

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

Washington maintains reference copies of all files transmitted and snapshots of the data that were used to develop these files. The State has established procedures, in the form of written logic, using SAS and other computer languages as needed, to perform ad hoc analyses, report case and participant characteristics and model effects of possible program modifications. This includes capacity to breakout TANF families with (or without) a work-eligible individual by the case characteristics that relate to the special rules and conditions of participation, such as receipt of child care, age of child, age of adult or teen parent, number of months under a sanction, adult or teen parent with satisfactory school attendance and families with a disabled family member (adult or child). This capacity allows us to examine any reported case characteristics for any subset of cases or individuals that can be identified by reference to any set (of one or more) of the data elements in the report files.

## Questions

- 1. For each of the above data elements, describe the State's validation procedures to ensure "complete and accurate" data reporting.**

See below. In addition, Washington follows the procedures described above in internal controls (IV.B.2.and 3.).

- 2. Describe any procedures employed to eliminate data inconsistencies between two or more data elements.**

The State will use procedures described above in internal controls (IV.B.1.) to prevent incorrect data entry and discover and correct errors.

## B. Work Participation Status

### Questions

- 1. Describe the States procedures to ensure that a family is not disregarded from the work participation rate for more than 12 months per lifetime based on being a single custodial parent with a child less than one year of age.**

This is an automated process executed using specific computer logic designed for this purpose. This is not directly under the control of eligibility or social services staff. It uses data (for example household composition data) stored in the eligibility system itself.

- 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 individual's refusal to participate in work.**

This is an automated process executed using specific computer logic designed for this purpose. This is not directly under the control of eligibility or social services staff. It uses data (for example data indicating reasons for grant reductions) stored in the eligibility system itself.

**3. Describe the States 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 age six**

This is an automated process executed using specific computer logic designed for this purpose. This is not directly under the control of eligibility or social services staff. It uses data (including, for example, data on age of household members and relationship to head of household) stored in the eligibility system itself.

# Appendixes

## **Appendix A: Qualified Medical or Mental Health Professionals**

The following qualified medical or mental health professionals will establish the necessity of treatment or therapy and document daily supervision for job readiness (rehabilitation) assistance.

### **Government Staff**

Documentation as to the necessity of treatment or therapy may be provided by staff from the:

- Division of Developmental Disabilities
- Division of Vocational Rehabilitation
- Home and Community Services Division
- Mental Health Division or Regional Support Network
- Community Services Division Social Workers

### **Medical Practitioners**

The following types of medical practitioners may document the necessity of treatment or therapy and provide daily supervision of job readiness (rehabilitation) assistance:

- Public health nurse
- Physician or health professional licensed in Washington State
- Certified mental health provider
- Certified mental retardation professional
- School professional
- Chemical dependency professional
- Family/domestic violence agency staff who meet the minimum training requirements as described in WAC 388-61A-0150
- Advanced registered nurse practitioner for physical impairments within her or his area of certification to treat
- Chief of Medical Administration of the Veteran's Administration or their designee, as authorized in federal law
- Physician assistance if cosigned by the supervising physician

Other health professional that has run tests or provides ongoing treatment to the participant.

# Certification

The Department of Social and Health Services is the single State agency responsible for administering the TANF State Plan and has the authority to make rules and regulations governing the administration of the plan, as authorized under RCW 74.04.050.

This is to certify that the Washington's TANF Work Verification Plan dated August 1, 2016 includes all the information required by the Regulations at 45 CFR 261.62(b) and accurately reflects the provisions under which Washington will be operating effective October 1, 2015.

Certified by the Title IV-A Administrator of the State:

8/23/2016  
Date

  
\_\_\_\_\_  
David Stillman, Assistant Secretary  
Economic Services Administration