

DEPARTMENT OF SOCIAL SERVICES

744 P Street, Sacramento, California 95814



February 21, 2008

ALL COUNTY LETTER NO. 08-07

TO: ALL COUNTY WELFARE DIRECTORS
ALL COUNTY WELFARE-TO-WORK
COORDINATORS
ALL CALWORKS PROGRAM SPECIALISTS
ALL COUNTY CHILD CARE COORDINATORS
ALL REFUGEE COORDINATORS

REASON FOR THIS TRANSMITTAL

- ☐ State Law Change
- ☐ Federal Law or Regulation
Change
- ☐ Court Order
- ☐ Clarification Requested by
One or More Counties
- ☒ Initiated by CDSS

SUBJECT: TRANSMITTAL OF CALIFORNIA'S WORK VERIFICATION PLAN FOR THE
TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF) PROGRAM

REFERENCES: All County Letters (ACL) 07-03 and 07-24

This letter transmits California's approved Work Verification Plan (WVP) and provides counties with a summary of the federal reporting requirements contained in the plan. California's WVP was approved on September 25, 2007 and became effective October 1, 2007. The approved WVP was distributed via email to TANF stakeholders, which include the County Welfare Directors Association (CWDA) and various county representatives. The approved WVP has also been shared with counties at various meetings, such as the CWDA CalWORKs Policy Committee, the County Advisory Team, and the 2007 CalWORKs Partnership Summit. The approved WVP was also made available online through the California Department of Social Services (CDSS) website at: <https://www.cdss.ca.gov/cdssweb/entres/pdf/CWVerificationPlan.pdf> CDSS has been working continuously with stakeholders to develop the general guidance and specific areas of clarification presented in this ACL.

Background

The Deficit Reduction Act of 2005 required the U.S. Department of Health and Human Services Administration for Children and Families (ACF) to issue regulations by June 30, 2006, to include a definition of federally-countable activities and establish documentation and verification requirements for activities that a state may count toward the TANF program work participation rate (WPR) requirements.

The Interim Final Rule was issued on June 29, 2006, and required states to submit a WVP that addressed each state's definitions of federally-countable work activities,

procedures for verification of participation hours, definition of a work-eligible individual, and a description of internal controls to ensure compliance with the procedures established in the WVP.

The State will be held accountable for complying with the WVP through federal audits. A penalty for failing to comply with the WVP begins at one percent of a state's TANF Block Grant for the first year of noncompliance with the approved WVP and increases by one percent for each subsequent year of noncompliance up to five percent (up to \$187 million annually).

CDSS began collaborating with stakeholders in July 2006 to develop the WVP. CDSS has received feedback from stakeholders and a series of guidance documents from ACF, as well as participated in conference calls with national representatives and other states.

The TANF Final Rule was published on February 5, 2008 and will become effective October 1, 2008. States are required to update the WVP when changes in the program occur. California's currently approved WVP (attached) will be amended by the state to integrate changes in the TANF Final Rule. At this time, it is anticipated any modification to the Work Verification Plan will be minor. Revisions to the WVP as a result of the TANF Final Rule will not be in effect until October 1, 2008. Although changes are anticipated, counties must comply with the currently approved WVP until a new plan has been approved and the TANF Final Rule goes into effect.

General Guidance

The WVP provides definitions of federally-countable work activities, procedures for documentation and verification of work activities, and defines a "work-eligible individual," which is a new term used to describe anyone who is required to be counted in the denominator for calculating the states' WPR. Additionally, the WVP details the internal controls that the state and counties will use to ensure compliance with the plan.

The WVP does not alter the California Work Opportunity and Responsibility to Kids (CalWORKs) program. As required by CalWORKs rules, activities in a participant's welfare-to-work plan must be based on the participant's assessment and be tailored to assist the participant in attaining self-sufficiency, regardless of whether or not the activities are federally countable. We strongly encourage counties to work with their local partners to establish procedures for obtaining information necessary for federal data reporting purposes and to maximize countable hours in the WPR.

The following paragraphs provide highlights from the WVP and clarification on common questions that have been asked about the WVP. However, counties should read the entire WVP in detail to ensure the key points highlighted below are taken in the appropriate context for each federal activity.

Federal Activities

Some activities meet the definition of more than one federal work activity. Counties should count participation where it is most advantageous (core, time-limited, etc.). For example, if a portion of Substance Abuse treatment meets the common-sense definition of another work activity, such as community service or work experience, the hours associated with that activity will count as Community Service or Work Experience; and the actual treatment hours (e.g., counseling) will count as Job Search and Job Readiness Assistance. In this example, the hours counted as Community Service or Work Experience do not count toward the federal four- to six-week time limit on Job Readiness. (See WVP, page 9.)

Likewise, if participants are in barrier removal activities in which they are paid, then those hours may count under subsidized employment or another paid activity as long as the participation meets the common-sense definition of a paid activity.

CalWORKs Activities

Some CalWORKs activities may not meet the definition of a federal work activity but can be considered a form of another federally-defined activity. For example, Adult Basic Education that is required as a prerequisite for employment is federally-countable as Education Directly Related to Employment (See WVP, page 15). Additional examples are Self-Employment and Work Study which are counted as Unsubsidized Employment and Subsidized Employment, respectively. (See WVP, pages 2-4.)

Further, although Vocational Education is often provided in high school, participation of minor parent heads-of-household attending high school, even if in a vocational education track, should be counted as Satisfactory Attendance at Secondary School (not Vocational Education). The 12-month limit on Vocational Education does not apply to Satisfactory Attendance at Secondary School.

Please review the definitions of activities and the reporting requirements in the WVP for further clarification on how to maximize countable participation by connecting activities.

Documentation and Verification

For all activities, participation hours must be monitored and verified on a monthly basis. (See WVP, pages 1, 10, 12-13, 15, 16-18, and 24.) The exception to monthly monitoring and verifying is the flexibility to project employment hours. (See WVP, pages 4, 5, and 8.)

If a participant reports verifiable employment (paid activities) information through the quarterly reporting (QR 7) process that meets the federal hourly requirements of 20, 30, or 35 hours/week, the current documented and verified actual hours of employment will be projected at that time for up to three months. If a participant begins employment during the QR7 data month, the county will determine the number of countable weekly hours of participation for the month by dividing the total actual monthly hours by 4.33 and then this number of hours per week is then projected as participation for up to three months. Please note that hours can be projected only when the participant is meeting the federal participation requirements. The projected hours must be recalculated if a

change in the participation hours or employment status is reported to the county, regardless of when the change is reported.

To count participation in paid work activities, counties must obtain and maintain written documentation, such as a pay stub, in the case file. ACF will accept a phone call to the employer verifying a participant's hours of work *only if* the verification is not available from the recipient, and the substance of such a call (who verified hours and what the hours were) is documented in the case file. ACF will also accept information from a third party source, such as the Work Number, as long as the information from the third-party source is verified through contact with the employer or other responsible party who has knowledge of the employment hours. (See WVP, pages 3, 5, and 7.)

To count participation in unpaid work activities, required documentation consists of a time sheet or the equivalent of a time sheet, which can be maintained by the participant, and signed by the supervisor, provider, or person verifying hours of participation. The elements of the timesheet/form do not need to exceed these minimum requirements:

- ▶ Name of participant
- ▶ Hours of participation
- ▶ Name of supervisor
- ▶ Service provider
- ▶ Name and telephone number of persons verifying hours
- ▶ Signature of the person verifying hours, such as a worksite sponsor, service provider, or other responsible party

For all activities, if the information necessary to document and verify hours is not made available, the county must contact the recipient and/or the service provider, as appropriate, to obtain such information. (See WVP, pages 6, 7, 10, 12, 13, 15, 16, 17 and 18.) Counties should not seek additional documentation beyond what is required at this time.

Electronic Documentation and Verification

An electronic timesheet is a record of attendance that is created and maintained in a computer database. Verified electronic attendance records are acceptable forms of documentation of participation in TANF work activities. The records must be maintained in the case file and must include the participant's name; the name of the employer, work site supervisor or other service provider; the number of hours; and the name and phone number of the person verifying the hours. The use of swipe cards to monitor attendance may be incorporated into an electronic timesheet system. A paper print-out that can be generated from a verified electronic record of attendance that meets the criteria identified above is also acceptable.

High School Attendees

When a teen parent head-of-household is attending high school, any documentation that a county can obtain from a high school or what the high school accepts as proof of attendance is sufficient for documenting participation. Participation hours are usually verified using report cards, attendance records, and similar documentation made

available by the service provider and/or participant and maintained in the case file. Documentation includes the participant's name; the name of the employer, work site supervisor or other service provider; the number of hours; and the name and phone number of the person verifying the hours. Case managers who have reason to believe that a participant is not attending school can require that specific verification be provided more often, as necessary. (See WVP, page 17.)

Distance Learning

Participation in distance or "online" learning and study sessions may only be counted as part of certain allowable activities. The participation must be monitored by the service provider, documented in the case file, and verified. Documentation for distance learning and study hours is the same as for hours participating on-site. Documentation must include the participant's name; the name of the employer, work site supervisor or other service provider; the number of hours; and the name and phone number of the person verifying the hours. (See WVP, pages 9, 13, 15, 16, and 17.)

Study Time

Counties can count actual hours of structured and monitored study time toward the WPR if those hours are documented and verified. The countable study time is the actual hours and is not related to whether or not, or to what degree, a course recommends a specified number of study time hours. Study time must be documented and verified in the same manner as other unpaid activities. Therefore, actual hours of participation must be verified using information that is documented in the case file or by contacting the service provider or recipient. The requirements are general in nature so that many methods for collecting the information would meet the federal requirements. (See WVP, pages 13, 15, 16, and 17.)

Daily Supervision

Federal rule requires that work activities be supervised no less than daily. However, this provision is not a literal interpretation in California's approved WVP. (See WVP, pages 3, 5, 6, 8, 10, 12, 14, 15, 16, 18, and 19.) For example, the daily supervision requirement for educational activities is the supervision determined appropriate and provided by the training or service provider at the same level as other students or trainees.

Excused Absences

Excused absence hours are not countable for participants in paid activities unless the participant is paid for the excused absence hours. For participants in unpaid work activities, a limited number of excused absences may be counted toward actual hours of participation. Excused absences are only countable if participation had been scheduled for the day of the excused absence. The allowable excused absences include ten state holidays and ten additional excused absence days per year. Of the additional ten days of excused absences, a maximum two excused absences may be counted per month. One day of excused absence begins when any time is taken as an excused absence, regardless if it is one hour or eight hours. Further, one excused absence cannot exceed one day. For example, if a participant is scheduled to participate in an educational

activity which has a week-long break within one month, only two of those days may be counted as an excused absence provided that the participant has not had any excused absences elsewhere within that month. (See WVP, page 19.)

Local Partnerships

Meeting the requirements of the WVP necessitates local partnerships more than ever. Strong partnerships are beneficial to counties, providers, and participants and can lead to simplification of data collection and maximization of countable participation. Specifically, counties are encouraged to contract with providers and require verification as part of the agreement to provide services to CalWORKs recipients. Verification procedures within agreements should be designed so that participants are not overburdened and counties are able to maximize countable participation.

Counties are reminded that they have a duty to protect the confidentiality of the participant and should not encourage verification requirements that would divulge private information. For example, counties should work with educational providers to determine how to best document and verify participation, eliminate the involvement of unnecessary parties and avoid stigmatizing the participant. One option is to use onsite coordinators to track attendance of CalWORKs participants and verify participation hours. Another option is to utilize electronic swipe card systems. For campuses that do not currently have onsite coordinators or electronic swipe card systems in place, counties may pursue one of those strategies.

Ongoing Efforts

The state has submitted several comment letters to ACF and federal legislators asking for restoration of some of the flexibility in administering the TANF program. Additionally, the recently released TANF Final Rule will result in revisions to the WVP. CDSS will continue to work with our federal partners on the effort to increase flexibility and with stakeholders to amend the WVP as required.

CDSS, with the help of stakeholders, has been developing a Best Practices Website for counties and providers to share effective practices, promising practices and lessons learned. One of the purposes of this site is to streamline county and service provider efforts statewide, including implementation of the WVP. The projected date for launch of this website is early 2008. Once launched, the website will be accessible through the CDSS website at: <http://www.dss.cahwnet.gov/cdssweb/Default.htm>

Additionally, CDSS is updating ACL 07-05 to incorporate the WVP provisions into the instructions for the county work participation rate data reporting system (E2 Lite) and will release an All County Information Notice (ACIN) containing answers to other questions that arise regarding the WVP.

CDSS will also reconvene the stakeholder workgroup to discuss and develop regulations that are appropriate now that the WVP has been approved. In addition, CDSS is currently reviewing forms that have been used by counties to track participation and will develop a *recommended* form for counties and providers to use to meet the federal data reporting requirements for unpaid activities.

As a final reminder, the documentation and verification of activities to be counted in the work participation rate calculation are not meant to alter the application of the CalWORKs rules. Counties must continue to offer CalWORKs recipients an array of options that will help them become self-sufficient.

This ACL summarizes key points within the WVP, and addresses questions that the CDSS has already received from counties and providers on specific items within the plan. If you have any questions regarding this letter or the WVP, please contact your county's Employment Bureau Analyst at (916) 654-2137. For any federal work participation data reporting questions, please contact your county consultant in CDSS's Federal Data Reporting and Analysis Bureau at (916) 651-6250.

Sincerely,

***Original Document
Signed By***

CHARR LEE METSKER
Deputy Director
Welfare to Work Division

Attachment

California's Work Verification Plan

Approved September 25, 2007

Effective October 1, 2007

State of California's TANF Program Work Verification Plan

I. GENERAL DESCRIPTION

The California Work Opportunity and Responsibility to Kids (CalWORKs) program is California's federal Temporary Assistance for Needy Families (TANF) program. CalWORKs provides temporary cash assistance to meet basic needs of families. It also provides education, employment and training programs to assist the family's move toward self-sufficiency. State law provides for a cumulative 60-month lifetime limit on cash aid for adults. For children of adults who exhaust the five-year time limit, aid is equal to the children's portion of the grant. California has 58 county welfare departments that administer the CalWORKs program under supervision of the California Department of Social Services (CDSS).

In order to become eligible for CalWORKs, applicants must meet income and property tests and children must be deprived of parental support and care due to the incapacity, death, absence, or unemployment of one or more parents. The State uses a Quarterly Reporting/Prospective Budgeting (QR/PB) process to determine initial and ongoing eligibility for cash assistance. With QR/PB, all recipients are required to submit a Quarterly Eligibility/Status Report (QR 7) once per quarter. Evidence must be submitted with the QR 7 form to verify the reported information. Recipient eligibility and benefits for the quarter are based on information provided on the form, and are determined using prospective budgeting rules. In addition, recipients' eligibility for cash aid is re-determined annually.

The welfare case history consists of all documents and forms relating to eligibility determinations for public assistance including documents necessary to support the granting or denying of aid, case narratives, personal documents, budget forms, referrals to and from other agencies, and correspondence to and from the recipient. In addition, the welfare case file contains welfare-to-work (WTW) records such as the WTW plan and copies of notices of action sent to the participant.

Parents and caretaker adults are required to participate in WTW activities as a condition of continued receipt of aid. To comply with program requirements, an adult in a one-parent assistance unit (AU) must participate, on a monthly basis, an average of 32 hours per week; adults in a two-parent AU must participate, on a monthly basis, an average of 35 hours per week (with one parent participating at least 20 hours). Adults are also required to participate a minimum of 20 hours per week in core work activities, with the balance of their 32- or 35-hour per week participation requirement spent in other non-core activities that will aid in obtaining employment. Participation hours are monitored and verified by county staff on a monthly basis. Individuals who do not comply with WTW program requirements are subject to a financial sanction equal to the adult's portion of the grant amount, in addition to the adult's removal from the AU.

For program eligibility determinations, California runs a system of automation that is used to help administer the CalWORKs program. In particular, the Statewide Automated Welfare System (SAWS) ensures statewide uniformity in program administration by supporting intake, eligibility determination and benefit calculation, annual re-determination of eligibility, benefit issuance, case management, fair hearings, quality control, fraud and reporting. The SAWS is implemented via four consortia systems:

- Los Angeles Eligibility, Automated Determination, Evaluation and Reporting (LEADER), which is comprised of only Los Angeles County and represents approximately 39 percent of the public assistance caseload;

- CalWORKs Information Network (CalWIN), which is comprised of 18 counties and represents approximately 35 percent of the public assistance caseload;
- Interim Statewide Automated Welfare System (ISAWS), which is comprised of 35 counties and represents approximately 13 percent of the public assistance caseload; and
- Consortium IV (C-IV), which is comprised of four counties and represents approximately 13 percent of the public assistance caseload.

California selects a representative sample of TANF families each month and coordinates a comprehensive review of sampled family cases. Content of TANF reviews focuses on collection and verification of federally specified information about the family and level of work activities. Capturing and reporting of information is supported with a version of the Case Review Application (Q5i) by State and county staff. The application assists the State in moving case reviews to and from State and county staff, structuring the review process, and managing flow of federally required monthly reporting responsibilities. The State collects completed case reviews and compiles data in the federally required report format for transmission to the Administration for Children and Families (ACF) on a quarterly basis.

II. COUNTABLE WORK ACTIVITIES

This section describes definitions, determination of countable hours, verification of actual hours, and methods of daily supervision for each countable work activity.

Unsubsidized employment

1. *Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity.)*

For federal data reporting purposes, unsubsidized employment is full-or part-time employment in the public or private sector that is not subsidized by TANF or any other public program. Unsubsidized employment includes self-employment as well as recipients whose employers claim a tax credit for hiring economically disadvantaged workers. Apprenticeship programs that allow participants to earn money while they practice the trade under the supervision of a journey person by day and attend classes are also considered unsubsidized employment. For an apprenticeship to be considered in this category, only the hours that are paid by the employer are counted as unsubsidized employment. The determination of whether employment is subsidized, or not, depends on whether the employer, rather than the recipient, receives a subsidy.

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

Weekly hours of participation are determined by dividing the monthly hours by 4.33 (the average number of weeks per month). If the information necessary to determine countable hours is not in the case file, the county welfare department will make contact with the recipient, employer, and/or service provider, as appropriate.

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

Generally, actual hours of participation for this activity are verified during the eligibility process using information gathered during the QR 7 process, which is signed by the head of household under penalty of perjury, and/or other records in the case file. Recipient eligibility and benefits for the quarter are based on information provided on the form. Evidence must be submitted with the QR 7 form to verify the reported information. Participants are responsible for making available to the county welfare department all documents in their possession or available to them that are needed to verify reported income as well as the date of receipt. Evidence of income includes pay stubs or other employer-produced documents that support the individual's employment. If the information necessary to verify actual hours is not in the case file, the county welfare department seeks verification from the Work Number or directly from the employer.

If the verification is not available from the recipient, the county provides the recipient assistance in obtaining the information by placing a phone call to the employer or sending a letter to verify the participant's work hours then documents the communication including the participant's name; the name of the employer, work site supervisor or other service provider; the number of hours; and the name and phone number of the person verifying the hours. Documentation of hours of participation is maintained in the case file.

Third-party sources of employment information, such as the National Directory of New Hires (NDNH), and the Income Eligibility and Verification System (IEVS) matches may be accessed when additional employment information is necessary. Prior to counting these hours, the information from third-party sources will be verified through collateral contact. The Work Number is a resource that can be used by counties to verify employment. Counties are permitted to use the information obtained from this source in the same manner as they would use information provided by the employer. Therefore, no further verification is necessary when using The Work Number.

4. *Describe the methods of daily supervision for each unpaid work activity.*

Not Applicable

- 5a. *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 or must describe an alternative methodology that is approved.*

Self-employment hours are verified primarily using information reported by the participant on the QR 7, which is signed under penalty of perjury, and/or other documents provided by the recipient and maintained in the case file. Recipient eligibility and benefits for the quarter are based on information provided on the form. In general, evidence must be submitted with the QR 7 form to verify the reported information provided by the recipient and documented in the case file. Reports of income and expenses are used to determine the recipient's TANF eligibility and grant amount. Net self-employment income is determined by offsetting monthly business expenses, evidenced by receipts submitted by the participant, against monthly gross income from self-employment. Based on current CalWORKs eligibility rules, the recipient may choose either actual costs of producing self-employment income or a standard deduction of 40 percent of gross earned income, which

will be reported as business expenses for federal data reporting purposes. For self-employed individuals, the maximum number of countable hours is determined by dividing the net self-employment income by the Federal minimum wage.

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

Beginning October 1, 2006, hours of participation in unsubsidized employment will be projected based on current, documented and verified actual hours. Generally, this information will be obtained using pay stubs and/or information reported through the QR 7 process and/or other data sources, such as employer reports and time and attendance records. Recipient eligibility and benefits for the quarter are based on information provided on the QR 7 form. Evidence must be submitted with the QR 7 form to verify the reported information. If an individual reports employment information on a QR 7 form that meets the federal hourly requirements of 20, 30, or 35 hours, those hours of employment will be projected as participation for three months, consistent with the eligibility determination for that same period of time. Weekly hours of participation are determined by dividing the total monthly hours by 4.33 (the average number of weeks per month). If an individual reports a change in work hours mid-quarter, the average weekly projected hours will be recalculated for purposes of participation.

Subsidized private sector employment and subsidized public sector employment (Note: Subsidized private and public sector employment are combined into one category in the Work Verification Plan. However, hours of participation in these activities are reported separately on the TANF Data Reports that are submitted to ACF.)

- 1. Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity.)*

For federal data reporting purposes, subsidized private sector employment and subsidized public sector employment means employment in the private and public sectors, respectively, 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 a recipient. Subsidized work may include (1) work supplementation where TANF funds that would otherwise be paid as assistance are paid to the employer or to a third-party contractor, like a temporary staffing agency, which serves as the employer of record and is paid a fee to cover salary, expenses and success in placing employees; (2) supported work for individuals with disabilities in an integrated setting, (3) work study activities or (4) paid barrier removal and educational activities. Subsidized employment is distinguished from work experience in that the participant in subsidized employment is paid wages and receives the same benefits as an employee with no subsidy who performs similar work.

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

Weekly hours of participation are determined by adding the total number of participation hours for the month and then dividing the total monthly hours by 4.33 (the average number of weeks per month). If the information necessary to determine countable hours is not in the case file, the county welfare department will make contact with the recipient, employer, and/or service provider, as appropriate.

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

Generally, actual hours of participation for this activity are verified during the eligibility process using information reported as part of the QR 7 process, which is signed by the head of household under penalty of perjury, and/or other records in the case file. Recipient eligibility and benefits for the quarter are based on information provided on the form. In general, evidence must be submitted with the QR 7 form to verify the reported information. Participants are responsible for making available to the county welfare department all documents in their possession or available to them that are needed to verify reported income as well as the date of receipt. Evidence of income includes pay stubs, or other employer-produced documents that support the individual's employment. If the information necessary to verify actual hours is not in the case file, the county welfare department seeks verification from the Work Number or directly from the employer.

If the verification is not available from the recipient, the county provides the recipient assistance in obtaining the information by placing a phone call to the employer or sending a letter to verify the participant's work hours then documents the communication including the participant's name; the name of the employer, work site supervisor or other service provider; the number of hours; and the name and phone number of the person verifying the hours. Documentation of hours of participation is maintained in the case file.

Third-party sources of employment information, such as the NDNH and the IEVS may be accessed when additional employment information is necessary for verification. Prior to counting these hours, the information from third-party sources will be verified through collateral contact. The Work Number is a resource that can be used by counties to verify employment. Counties are permitted to use the information obtained from this source in the same manner as they would use information provided by the employer. Therefore, no further verification is necessary when using The Work Number.

4. *Describe the methods of daily supervision for each unpaid work activity.*

If hours of participation in training or other job-required, job-sponsored unpaid activities are reported in this category, daily supervision is the supervision determined appropriate and provided by the employer, training or service provider at the same level as other employees of the organization.

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

Beginning October 1, 2006, hours of participation will be projected based on current, documented and verified actual hours. Generally, this information will be obtained using pay stubs and/or information reported through the QR 7 process and/or other data sources such as employer reports, and time and attendance records. Weekly hours of participation are determined by dividing the total monthly hours by 4.33 (the average number of weeks per month). If an individual reports information on a QR 7 that meet the federal hourly requirements of 20, 30 or 35 hours, those hours will be projected for a minimum of three months, consistent with the eligibility determination for that same period of time. If an individual reports a change in work hours mid-quarter, the average weekly projected hours will be recalculated for purposes of participation.

Work experience

1. *Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity.)*

Work experience is training in the public or private sector that helps provide basic job skills, enhances existing job skills in a position related to the participant's experience, or provides a needed community service that shall lead to unsubsidized employment. Hours shall be limited as follows:

- When the assistance unit includes food stamp recipients, the individual shall participate for no more than the number of hours each month, determined collectively for the assistance unit, equal to the CalWORKs grant plus the food stamp allotment divided by the State or federal minimum wage, whichever is higher; or
- When the assistance unit does not include food stamp recipients, the individual shall participate for not more than the number of hours each month, determined collectively for the assistance unit, equal to the CalWORKs grant divided by the state or federal minimum wage, whichever is higher.

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

Weekly hours of participation are determined by adding the total number of hours for the month in this activity and then dividing the total monthly hours by 4.33 (the average number of weeks per month).

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

The number of actual hours of participation for this activity may be documented and verified using information gathered during the QR 7 process, which is signed by the head of household under penalty of perjury, and/or other records in the case file, such as time and attendance records from the service provider or recipient, and/or welfare-to-work records. If documentation is not gathered during the QR7 process and the documentation necessary to verify actual hours is not in the case file, the county welfare department will seek documentation from the service provider. The documentation is maintained in the case file and includes the participant's name; hours of participation; the name of the supervisor, service provider or employer; and the name and telephone number of the person verifying the hours.

4. *Describe the methods of daily supervision for each unpaid work activity.*

If hours of participation in unpaid training are reported in this category, daily supervision is the supervision determined appropriate and provided by the employer, training or service provider at the same level as other trainees in the organization.

On-the-job training

1. *Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity.)*

For federal data reporting purposes, on-the-job training is training in the public or private sector that is given to a paid employee while he or she is engaged in productive work. On-the-job training provides knowledge and skills that are essential to the full and adequate performance of the job. The employer is subsidized to offset training costs.

Supported work may be counted as on-the-job training if it includes significant training in the skills and knowledge essential to job performance. On-the-job training may also include orientation and classroom instruction required by the recipient's employer and/or case manager. In some instances, training (e.g., tax preparation) or continuing education (e.g., nursing) is a necessary and regular element of employment. On-the-job training may include participation in these types of activities when the individual is reimbursed for the training costs. When the individual is not reimbursed for training costs, the participation counts as job skills training directly related to employment, education directly related to employment, vocational educational training, or job search job readiness assistance, as appropriate.

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

Weekly hours of participation are determined by adding the total number of hours for the month in this activity and then dividing the total monthly hours by 4.33 (the average number of weeks per month). If the information necessary to determine countable hours is not in the case file, the county welfare department will make contact with the recipient, employer, and/or service provider, as appropriate.

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

Generally, actual hours of participation for this activity are verified during the eligibility process using information reported as part of the QR 7 process, which is signed by the head of household under penalty of perjury, and/or other records in the case file. Recipient eligibility and benefits for the quarter are based on information provided on the form. In general, evidence must be submitted with the QR 7 form to verify the reported information. Participants are responsible for making available to the county welfare department all documents in their possession or available to them that are needed to verify reported income as well as the date of receipt. Evidence of income includes pay stubs, or other employer-produced documents that support the individual's employment. If the information necessary to verify actual hours is not in the case file, the county welfare department seeks verification from the Work Number of directly from the employer.

If the verification is not available from the recipient, the county provides the recipient assistance in obtaining the information by placing a phone call to the employer or sending a letter to verify the participant's work hours then documents the communication including the participant's name; the name of the employer, work site supervisor or other service provider; the number of hours; and the name and phone number of the person verifying the hours. Documentation of hours of participation is maintained in the case file.

4. Describe the methods of daily supervision for each unpaid work activity.

Daily supervision is the supervision determined appropriate and provided by the training or service provider at the same level as other trainees or employees of the organization.

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

Unlike subsidized employment, the subsidy provided to the employer offsets the cost of training provided to the participant. In contrast, subsidized employment is an activity in which the recipient is paid in the form of either wages or the cash aid grant for work and training time.

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

Beginning October 1, 2006, hours of participation will be projected based on current, documented and verified actual hours. Generally, this information will be obtained using pay stubs and/or information reported through the QR 7 process and/or other data sources, such as employer reports and time and attendance records. Recipient eligibility and benefits for the quarter are based on information provided on the QR 7 form. In general, evidence must be submitted with the QR 7 form to verify the reported information. If an individual reports employment information on a QR 7 form that meets the federal hourly requirements of 20, 30, or 35 hours, those hours of employment will be projected as participation for three months, consistent with the eligibility determination for that same period of time. Weekly hours of participation are determined by dividing the total monthly hours by 4.33 (the average number of weeks per month). If an individual reports a change in work hours mid-quarter, the average weekly projected hours will be recalculated for purposes of participation.

Job search and job readiness assistance

1. Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity.)

Job search is an activity in which the participant's principal activity is to seek employment. Job search includes looking for suitable job openings, making contact with potential employers, applying for vacancies, and interviewing for jobs. Job readiness assistance is an activity that provides a recipient with training to learn basic job seeking and interviewing skills, to understand employer expectations, and to learn skills designed to enhance an individual's capacity to move toward self-sufficiency. Job readiness assistance also comprises the following activities:

- a. Preparing an individual to obtain or retain employment, such as preparing a resume or job application, interviewing skills, instruction in work place expectations, life skills training; and
- b. Substance abuse treatment, mental health treatment, or rehabilitation activities for those who are otherwise employable.

Treatment or rehabilitation services can include residential treatment, group or individual therapy, support group, or participation in Alcoholics Anonymous, and

Narcotics Anonymous. While the Family Violence Option has been adopted for domestic abuse victims, on a case-by-case basis, if the individuals are capable of employment, they have the opportunity to address barriers to employment.

Treatment and services for domestic abuse victims include the following activities when needed to seek or prepare for employment: individual counseling of the participant and children; group counseling; substance abuse services; medical and public health services; mental health services; independent living skills; financial planning and life skills training.

The criteria professionals use for assigning these services is that they must be necessary to prepare an individual to obtain or maintain employment or participate in welfare-to-work activities and must be verified and documented in the WTW plan and/or case file. If a portion of the treatment or rehabilitation activities meets a common-sense definition of another work activity, such as community service or work experience, then the hours associated with the “work” will count under that activity and the actual treatment hours will count in job search and job readiness assistance.

- c. Drug testing for a specific job classification and taking tests to qualify for specialized certificates. These activities will be assigned to the extent they are determined necessary for the participant to obtain or prepare for employment or participate in other welfare-to-work activities.
- d. Hours reported under this activity may include time spent online in distance learning activities. Online tasks could include, searching for job vacancies, submitting résumés and completing applications.

Hours spent in these activities will be verified and documented in the WTW plan. Job interviews may be obtained from participating in this activity. Reasonable transportation time between job interviews, but not to the first interview or from the last one of the day, will count toward job search and job readiness hours. A county may require additional verification of activities, which may include such documents as job contact logs that provide sufficient information to verify the job search activity, mileage logs, or other documentation included in the case file.

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

Weekly hours of participation are determined by adding the total number of participation hours for the month in this activity and then dividing the total monthly hours by 4.33 (the average number of weeks per month). If the information necessary to determine countable hours is not in the case file, the county welfare department will make contact with the recipient and/or service provider, as appropriate.

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

The number of hours of participation for this activity is documented and verified using records maintained in the case file, such as time and attendance records from the service provider or recipient, and/or other welfare-to-work records. If information necessary to verify actual hours is not in the case file, the county welfare department will seek

documentation from the service provider. The documentation is maintained in the case file and includes the participant's name; the name of the employer, work site supervisor or other service provider; the number of hours; and the name and phone number of the person verifying the hours and is made available at least monthly by the service provider, supervisor, and/or participant.

4. Describe the methods of daily supervision for each unpaid work activity.

Daily supervision is the supervision determined appropriate and provided by the training or service provider at the same level as other job search and job readiness assistance participants. If the work-eligible individual is assigned to self-directed job search, the individual will communicate and/or discuss his or her participation on a daily basis with a service provider or case manager to ensure that he or she receives support and direction in the activity. Documentation of this communication, whether by e-mail, telephone or in person, will be maintained in the case file.

5a. If the State intends to count substance abuse treatment, mental health treatment and rehabilitation activities, describe the criteria to determine whether recipients are "otherwise employable" and establish the necessity of treatment or therapy. Describe the certification requirements for qualified medical or mental health professionals used in this process.

California intends to count substance abuse treatment, mental health treatment and rehabilitation services for those who are otherwise employable. If there is a concern that a mental disability exists that will impair the ability of a recipient to obtain employment, he or she is referred to the county mental health department for an evaluation. The county mental health department or its contractor evaluates the recipient and makes a determination of any treatment needs.

The evaluation includes the extent to which the individual is capable of employment at the time and under what working and treatment conditions the individual is capable of employment. The evaluation also includes any prior diagnoses, assessments, or evaluations that the recipient provides. The county welfare department develops the individual WTW plans for participants with mental or emotional disorders based on this evaluation.

If there is a concern that a substance abuse problem exists that will impair the ability of a recipient to obtain or retain employment, he or she is referred to the county alcohol and drug program for an evaluation and determination of any treatment necessary for the participant's transition from welfare to work. If the county welfare department determines that the county alcohol and drug program or its contractor and/or service provider is unable to provide the needed services, the county welfare department may contract directly with a non-profit State-licensed narcotic treatment program, residential facility, or certified non-residential substance abuse program to obtain substance abuse services for participants. If a participant is determined to have a substance abuse problem, the participant's WTW plan is based on the results of the evaluation. The WTW plan may include appropriate treatment requirements, including assignment to a substance abuse program.

Learning disability evaluations must be performed by qualified learning disability professionals who use recognized and validated learning disabilities evaluation tools to identify learning disabilities and to determine the appropriate accommodations for individuals with learning disabilities. If the learning disabilities evaluation establishes that

the participant has a learning disability that interferes with obtaining or retaining employment or participating in program activities, the county welfare department will develop or modify the welfare-to-work plan to reflect appropriate activities and necessary reasonable accommodations. This will be done based on the results of the learning disabilities evaluation and discussions with the participant.

- 5b. 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 twelve weeks in States that meet the definition of a "needy State" for the Contingency Fund).*

For purposes of the six-week limit, no more than four consecutive weeks per federal fiscal year, will be counted. A week consists of seven consecutive days. Beginning October 1, 2006, a week starts on Monday and ends on Sunday. Participation by each individual is evaluated and a determination is made about whether the hours of participation in job search and job readiness are necessary for the case to meet the federal work requirements.

For the purposes of completing the TANF data reports, the State currently ensures the time limit is not exceeded by individual analysis of each case file by data collection staff. Beginning October 1, 2006, if participation in other federally-allowable activities meets or exceeds the requirement, then the hours of participation in job search and job readiness assistance will not be counted toward the six-/12-week limit. Beginning October 1, 2007, the State will verify that the county welfare departments have tracking systems in place that monitor participation consistent with federal requirements.

Community service programs

- 1. Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity.)*

Community service is training that is temporary and transitional, is performed in the public or private nonprofit sector, and provides basic job skills that may lead to employment while meeting a community need. Other activities may be included within the community service programs. In these situations, short-term training or equivalent activities will be included if they are of limited duration (usually no longer than six months) and are necessary for participation in the community service activity.

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

Weekly hours of participation are determined by adding the total number of participation hours for the month in the activity and then dividing the total monthly hours by 4.33 (the average number of weeks per month). If the information necessary to determine countable hours is not in the case file, the county welfare department will make contact with the recipient and/or service provider, as appropriate.

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

Actual hours of participation are documented and verified using time sheets, attendance records, and similar documentation made available and signed by the service provider and maintained in the case file. If the documentation is not signed by the service provider, actual hours of participation are verified by contacting the service provider.

Documentation includes the participant's name; the name of the employer, work site supervisor or other service provider; the number of hours; and the name and phone number of the person verifying the hours. Documentation of participation is provided on a monthly basis, which is maintained in the case file.

4. *Describe the methods of daily supervision for each unpaid work activity.*

Daily supervision is the supervision determined appropriate and provided by the training or service provider at the same level as other community service participants.

- 5a. *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.*

In California, community service positions are subject to the FLSA minimum wage requirements. As a result, the number of hours of participation in community service programs is determined by adding the monthly CalWORKs grant and food stamp amounts and then dividing by the federal or state minimum wage, whichever is higher. In addition, the State provides workers' compensation coverage to recipients in community service programs and work experience activities.

- 5b. *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.*

Participation in self-initiated community service programs is permitted as long as the activity is temporary and transitional, is performed in the public or private nonprofit sector, provides basic job skills that may lead to employment while meeting a community need, and is approved by the county welfare department. The county welfare department will only approve self-initiated community service programs that are appropriate for the participant based on the assessment of the following:

- The participant's work history and an inventory of his or her employment skills, knowledge, and abilities.
- The participant's educational history and present educational competency level.
- An evaluation of the chances for employment given the current skills of the participant and the local labor market conditions.

Vocational educational training

1. *Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity.)*

For federal data reporting purposes, vocational educational training is organized educational programs that are directly related to the preparation of individuals for employment in current or emerging occupations that require training other than a baccalaureate or advanced degree. Vocational education must be provided by vocational-technical schools, postsecondary institutions and proprietary schools.

Vocational educational training placements are documented on a list developed by each California county. The list, which is revised annually, includes programs that lead to jobs in the local labor market and is used by the county welfare department to approve vocational educational training and/or to assign activities as a result of assessment. For programs not on the county's list, the county welfare department determines if the program is directly related to job preparation.

In some instances, the vocational educational training will be completed as part of distance learning. Participation will count toward vocational educational training hours only when the time spent can be monitored by the service provider and reported to the county welfare department. Only structured and monitored study sessions which can be verified and documented in the case file will be counted.

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

Weekly hours of participation are determined by adding the total number of participation hours for the month in the activity and then dividing the total monthly hours by 4.33 (the average number of weeks per month). If the information necessary to determine countable hours is not in the case file, the county welfare department will make contact with the recipient and/or service provider, as appropriate.

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

The actual hours of participation for this activity may be documented and verified using information gathered during the QR 7 process, and/or other records in the case file, such as laboratory time and classroom time sheets, attendance records, and similar documentation made available by the service provider and/or participant and maintained in the case file. Documentation is reported to the county welfare department on a monthly basis. If documentation is not gathered during the QR 7 process and information necessary to verify actual hours is not in the case file, the county welfare department will seek documentation from the service provider. Documentation is maintained in the case file and includes the participant's name; the name of the employer, work site supervisor or other service provider; the number of hours; and the name and phone number of the person verifying the hours.

4. *Describe the methods of daily supervision for each unpaid work activity.*

Daily supervision is the supervision determined appropriate and provided by the training or service provider at the same level as other students and trainees.

5a. *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.*

For purposes of completing the TANF data reports, the State currently ensures the time limit is not exceeded by individual analysis of each case file by data collection staff. The State ensures that no more than 12 months of vocational educational training are counted per lifetime by evaluating the participation of each individual and determining whether the hours in the activity are necessary for the case to meet the federal work requirements. Participation in vocational educational training beyond 12 months will count as job skills training directly related to employment or education directly related to employment only after the core hourly requirement has been met.

Beginning October 1, 2006, if participation in other federally-allowable activities meets or exceeds the requirement, then the hours of participation in vocational educational training will not be counted toward the 12-month limit. Beginning October 1, 2007, the State will verify that the county welfare departments have tracking systems in place that monitor participation consistent with federal requirements.

5b. *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 limited duration and a necessary or regular part of the vocational education training.*

Basic and remedial education and English as a Second Language will be counted as part of vocational educational training activity on a case-by-case basis when the participant's educational history and present educational competency level assessment shows a need for such activities to be included in the vocational education program for the participant to be successful. For example, Vocational English as a Second Language (VESL) is a short-term (usually three to six months) embedded activity that allows non-native English speakers to learn the language that is specific to and necessary for successful performance in a particular vocation. The service provider and/or the recipient's case manager will determine whether the activities are necessary for successful participation.

Job skills training directly related to employment

1. *Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity.)*

For federal data reporting purposes, job skills training directly related to employment 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. The activity may include either customized or general training to prepare an individual for employment, including literacy and language instruction and other remedial education. Job skills training directly related to employment may include four-year bachelor degree programs at any State-certified college or university. Activities may include vocational educational training that has been extended beyond 12 months.

In some instances, the job skills training will be completed as part of distance learning. Participation will count toward job skills training directly related to employment only when the time spent in the distance learning component can be monitored by the service provider and reported to the county welfare department and documented in the case file. Only structured and monitored study sessions that can be documented and verified will be counted.

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

Weekly hours of participation are determined by adding the total number of participation hours for the month in this activity and then dividing the total monthly hours by 4.33 (the average number of weeks per month). If the information necessary to determine countable hours is not in the case file, the county welfare department will make contact with the recipient and/or service provider, as appropriate.

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

The hours of participation for this activity may be documented and verified using information gathered during the QR 7 process, and/or other records maintained in the case file, such as time and attendance records made available by the service provider or recipient, and/or welfare-to-work records. If the documentation is not gathered during the QR 7 process, and information necessary to verify actual hours is not in the case file, the county welfare department will seek documentation from the service provider. Documentation is maintained in the case file and includes the participant's name; the name of the employer, work site supervisor or other service provider; the number of hours; and the name and phone number of the person verifying the hours. Any job skills training that is completed as part of distance learning must be monitored and documented and verified by the service provider, reported to the county welfare department on a monthly basis, and documented in the case file.

4. *Describe the methods of daily supervision for each unpaid work activity.*

Daily supervision is the supervision determined appropriate and provided by the training or service provider at the same level as other trainees.

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

1. *Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity.)*

For federal data reporting purposes, education directly related to employment is education related to a specific occupation, job, or job offer. The activity is primarily for adults and includes adult basic education and ESL and, where required as a prerequisite for employment, education leading to a General Educational Development (GED) credential or high school equivalency diploma.

In some instances, the education directly related to employment will be completed as part of distance learning. Participation will count toward education directly related to

employment only when the time spent in distance learning can be monitored by the service provider and is reported to the county welfare department. Only structured and monitored study sessions that can be documented and verified will be counted, including time spent in distance learning.

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

Weekly hours of participation are determined by adding the total number of participation hours for the month in the activity and then dividing the total monthly hours by 4.33 (the average number of weeks per month). If the information necessary to determine countable hours is not in the case file, the county welfare department will make contact with the recipient and/or service provider, as appropriate.

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

The actual hours of participation for this activity may be documented and verified using information reported through the QR 7 process, and/or other records in the case file, such as laboratory time and classroom time sheets, attendance records, and similar documentation signed by the service provider and/or participant and maintained in the case file. If the documentation is not signed by the service provider, actual hours of participation are verified by contacting the service provider. Documentation includes the participant's name; the name of the employer, work site supervisor or other service provider; the number of hours; and the name and phone number of the person verifying the hours. Documentation and verification of participation is reported to the county welfare department on a monthly basis.

4. *Describe the methods of daily supervision for each unpaid work activity.*

Daily supervision is the supervision determined appropriate and provided by the training or service provider at the same level as other students.

5. *Describe the state's criteria for "good or satisfactory progress" and when and how it is documented.*

The standard for "good or satisfactory progress" is determined by the service provider using the service provider's criteria. In general, attendance, academic performance and completion timeframes may be included in the criteria. Documentation of satisfactory progress is provided as often as is determined by the service provider and usually consists of report cards and progress reports. Satisfactory progress is monitored monthly by the county welfare department and the documentation is verified and maintained in the participant's case file, except for teen parent heads of household receiving Cal-Learn services, which is monitored up to four times per school year.

By October 1, 2007, California will, to the extent the State identifies a participant who is not making good or satisfactory progress but is regularly attending, count up to two months of participation for individuals who may not be making satisfactory progress while the State works with the participant to improve his or her participation and progress.

Satisfactory school 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

1. *Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity.)*

For federal data reporting purposes, satisfactory school attendance is 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 recipient who has not completed secondary school or received such a certificate. Satisfactory school attendance is primarily an activity for minor parents and will only include other related educational activities, such as adult basic education or language instruction, when they are required for completion of a General Educational Development (GED) credential.

In addition, case management services are provided to minor parents in this activity. Case management involves directing and coordinating a recipient's educational, health, and social services and may include ESL, career training, alternative school, tutoring, dropout prevention, and teen pregnancy or parenting programs. The case management programs are essential to this work category in that they address the special social service needs of minor parents. Meeting these specific needs helps this group of recipients attain GED credential or attend secondary school, which helps minor parents achieve self-sufficiency.

In some instances, participation will be completed as part of distance learning and will count toward satisfactory school attendance only when the time spent can be monitored by the service provider and is reported to the county welfare department on a monthly basis. Only structured and monitored study sessions that can be documented and verified will be counted.

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

Weekly hours of participation are determined by adding the total number of participation hours for the month in this activity and then dividing the total monthly hours by 4.33 (the average number of weeks per month). If the information necessary to determine countable hours is not in the case file, the county welfare department will make contact with the recipient, employer, and/or service provider, as appropriate.

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

Participants must provide routinely available documentation of school attendance and satisfactory progress. Actual hours of participation are verified using report cards, attendance records, and similar documentation made available by the service provider and/or participant and maintained in the case file. Documentation includes the participant's name; the name of the employer, work site supervisor or other service provider; the number of hours; and the name and phone number of the person verifying the hours. Case managers who have reason to believe that a participant is not attending school can require that specific verification be provided more often, as necessary.

4. *Describe the methods of daily supervision for each unpaid work activity.*

Daily supervision is the supervision determined appropriate and provided by the training or service provider at the same level as other students.

5. *Describe the state's criteria for "good or satisfactory progress" and when and how it is documented.*

"Good or satisfactory progress" is determined by the service provider using the service provider's standard. In general, attendance, academic performance and completion timeframes may be included in the standard. Documentation of satisfactory progress is provided as often as is determined by the service provider and can include, but is not limited to, report cards and progress reports. Satisfactory progress is monitored at least monthly by the county welfare department and the documentation is maintained in the participant's case file.

By October 1, 2007, California will, to the extent the State identifies a participant who is not making good or satisfactory progress but is regularly attending, count up to two months of participation for individuals who may not be making satisfactory progress while the State works with the participant to improve his or her participation and progress.

Providing child care services to an individual who is participating in a community service program

1. *Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity.)*

For federal data reporting purposes, providing child care services is providing child care to enable another TANF recipient to participate in a community service program. The activity does not allow for one parent in a two-parent case to care for their own children in the home.

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

The number of hours of participation are determined by adding the total number of participation hours for the month in this activity and then dividing the total monthly hours by 4.33 (the average number of weeks per month). If the information necessary to determine countable hours is not in the case file, the county welfare department will make contact with the recipient, employer, and/or service provider, as appropriate.

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

Actual hours of participation are verified using time sheets, attendance records, and similar documentation made available by the service provider and/or participant and maintained in the case file. Documentation includes the participant's name; the name of the employer, work site supervisor or other service provider; the number of hours; and the name and phone number of the person verifying the hours.

4. *Describe the methods of daily supervision for each unpaid work activity.*

Daily supervision is the supervision determined appropriate and provided by the child care training or service provider at the same level as other participants.

III. HOURS ENGAGED IN WORK

Excused Absences

1. *Describe the State's excused absence policies for unpaid work activities. This includes its policies for holidays as well as the ten additional excused absences that the State may count in a 12-month period. If the policies vary by work activity, the State should describe how they vary and for which activities.*

Each recipient engaged in unpaid work activities is allowed excused absences. These absences include ten state holidays as well as ten additional excused absences during a 12-month period. The following state holidays are allowed as excused absences: New Year's Day, Martin Luther King, Jr. Day, President's Day (Washington's Birthday), Memorial Day, Independence Day, Labor Day, Veterans Day, Thanksgiving, Day after Thanksgiving, and Christmas Day. In addition, ten excused absences, not more than two per month, are allowed for semester breaks, planned work shutdowns, school appointments, medical appointments for self or dependants, caseworker appointments, child care breakdown, child illness, family problems including domestic abuse issues, housing issues, transportation breakdown, and other similar problems. Documentation and verification of all excused absences must be maintained in the case file.

FLSA Deeming

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. Include a statement certifying that the State has adopted a food stamp workfare program and a limited or "mini" Simplified Food Stamp Program.*

The State plans to use the "deeming" provision permitted under Sections 261.31 and 261.32 for determining the maximum monthly hours that a participant may participate in the following State CalWORKs WTW activities: unpaid work experience and unpaid community service. The State received letters dated May 5, 2000, and August 3, 2000, from the United States Department of Agriculture Food and Nutrition Service approving the State's request for authority to implement a Simplified Food Stamp Program (SFSP). Also, the State certifies that California has adopted a "mini" SFSP in order to count the value of food stamp benefits. The State determines the maximum monthly hours of participation by combining the CalWORKs assistance unit's grant plus the assistance unit's portion of the food stamp allotment and dividing it by the state or federal minimum wage, whichever is higher. No more than that number of hours will be allowed as participation in these activities. When FLSA "deeming" is used, required hours will be tracked and recorded using the verification and documentation procedures for the work experience and community service activities. Beginning October 1, 2006, if the calculated number is not sufficient to meet the hourly requirement, the State will deem 20 core hours.

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

There is no difference in FLSA deeming for work experience and community service programs.

IV. WORK-ELIGIBLE INDIVIDUAL

1. *Describe the State's procedures for identifying all work-eligible individuals, as defined at § 261.2.*

A work-eligible individual is defined as 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 such assistance (usually a child-only case) unless the parent is:

- A minor parent and not the head-of-household or spouse of the head-of-household; or
- An alien who is ineligible to receive assistance due to his or her immigration status; or
- A recipient of Supplemental Security Income (SSI) benefits.

The term also excludes:

- A parent providing care for a disabled family member living in the home who does not attend school on a full-time basis, provided that the need for such care is supported by medical documentation, and
- An individual in a family receiving MOE-funded assistance under an approved Tribal TANF program.

Further clarification on work-eligible individuals has been provided in additional instructions to county welfare departments as follows:

Disabled means the individual is receiving benefits from State Disability Insurance, Worker's Compensation Temporary Disability Insurance, In-Home Supportive Services, or the State Supplementary Program. For adult family members, disabled also means the individual is temporarily disabled and the disability is expected to last at least 30 days and significantly impairs the individual's ability to be regularly employed or participate in activities. For family members who are children, the disability significantly impairs his or her ability to participate in school activities. In addition to providing verification from a doctor of his or her disability, the individual will be required to actively seek treatment, if appropriate, as verified by a doctor.

Family member means the individual is a relative living in the household. A relative may be any relation by blood, marriage or adoption who is within the fifth degree of kinship to the dependent child, as defined in CDSS Manual of Policies and Procedures Section 82-808.

Attending School Full Time means attending school for the number of hours, weeks, or days determined by the school district or service provider to be full time. Attendance is actual attendance and not based solely on enrollment. Documentation that confirms the condition or disability may also be verified by information that is already contained in the case file. Such ability to actually attend school shall be reviewed on a no less than annual basis and must be documented in the case file. If a family member cannot regularly attend school during school hours, then the parent is qualified for the exclusion. The exclusion for not having a family member in school full-time must be accompanied by a medical examination by a doctor. Doctor means a health care professional who is licensed by a state to diagnose/treat physical and mental impairments that can affect an individual's ability to work or participate in welfare-to-work activities. Doctor includes, but is not limited to, doctors of medicine, osteopathy, chiropractic, and licensed/certified psychologists. The examination must confirm that the condition or disability may require the parent to care for the disabled family member at home, or not at school, during school hours, and thus affect the family member's probability of attending school full-time. Home-schooling due to the family member having a disability that prevents full-time attendance in school does not qualify as "attending school full-time."

2. Describe verification procedures for ensuring the accuracy in reporting of work-eligible individuals on the TANF Data Report and the SSP-MOE Data Report, including:

- 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 sample that is used for federal data reporting purposes is pulled based on the TANF Sampling Plan using the identified populations (i.e., All Families and Two-Parents) by aid type. Safety net and child-only cases are also included in the sample.

After the sample is drawn, accuracy is verified at both the county and state levels. The work participation status is verified at the time the county gathers documentation to review the case. When the case is returned to the State, state reviewers perform an additional check of work participation status.

TANF families are identified for exclusion from the work participation rates or inclusion in the overall work participation rate by county staff while reviewing the sample cases. At the state level, reviewers perform additional reviews of cases included in the sample.

The current data architecture involves splitting and distributing case data to designated Case Review Agencies and merging collected data back into a single database. At any given time, cases within the case database are distributed across multiple computer systems and locations across the State. The current technical architecture includes case review agency workstations for case reviews, repository where dialup modems are used to transmit cases, State local area network, and State case database. The State samples TANF cases, and then produces skeleton files that include data that is sorted and transmitted to the case review agencies. The agencies complete the case reviews, which are collected by the State via the repository. The State transmits the completed cases to ACF via modem.

3. Describe the procedures that show how the State ensures that, for each work-eligible individual, it accurately inputs data into the automated data processing system, properly tracks the hours, and accurately reports countable hours to HHS that do not include participation in an activity that does not meet a Federal definition.

Based on federal regulations and data reporting instructions, state-specific guidance is developed for county and State staff to use in reporting data, including the instruction to verify all reported data and retain in the case file (manual or electronic) all documentation used for verification. By October 1, 2006, those procedures will be adjusted to include the additional work-eligible individuals.

The State makes sample cases available to county and State staff for review. These sample cases are reviewed by gathering documentation and the accompanying verification of case information, including work participation status and hours of participation. The counties report verified hours of participation and return the cases to the State. The State reviews the sample cases for edits and data consistencies and then transmits the participation data to the federal government. Hours are not counted unless they are documented and verified.

V. INTERNAL CONTROLS

California submits sampled information to meet the mandated reporting requirements. Each sampled case is individually assessed by either State or county staff. Case characteristics and participation information is collected and reported utilizing the Q5i application. The Q5i is a system for quality control and data collection for California's welfare programs. It is used by the State staff and the 19 largest counties in the state to capture Food Stamps Quality Control and TANF data, develop reports and transmit data to federal agencies. The application has been enhanced to include business rules and edits to assist in accurate and consistent data collection.

1. Describe the phase-in of procedures and/or internal controls.

Most provisions in California's Work Verification Plan are effective October 1, 2006. However, there are some provisions that will be phased in (by October 1, 2007). These provisions are:

- In early October 2006, additional training was provided to data collection staff to ensure understanding of definition and rule changes. Training is provided on an on-going basis to the state and county case review staff on data collection and work participation requirements, especially as additional information regarding federal reporting requirements become available.
- In the upcoming federal fiscal year, California will deploy a new web-based data survey tool with enhanced business rules and edits to further assist in collection and transmission of accurate data.
- The State will ensure that counties are accurately tracking and monitoring limits to vocational educational training and job search and job readiness assistance by October 1, 2007.
- By October 1, 2007, for education directly related to employment and satisfactory school attendance, California will, to the extent the State identifies a participant

who is not making good or satisfactory progress, count up to two months of participation for individuals who may not be making satisfactory progress while the State works with the participant to improve his or her participation and progress.

2. *Describe the internal controls to ensure established work verification procedures are properly being employed.*

At the state level, virtually all the work verification procedures identified in this plan are current, well-established procedures used for federal data reporting and/or eligibility determinations. These procedures have been shared, in writing, with the state and county staff that collect data for federal data reporting purposes. In a continuing effort to improve the state's data reporting accuracy, ongoing training and procedural updates are provided to staff. In addition, text help is available in the Q5i application and a secondary review of select data elements is completed at the state level.

State staff will:

- Perform county-level reviews and analyses of data collection processes, including the county's automated system to determine if data collection complies with the State's approved Work Verification Plan;
- Conduct case validation reviews of county and State work participation findings for individual cases. Approximately 75 percent of sampled cases will be reviewed to determine whether the data was collected in accordance with the approved plan and meets federal and State wage or activity participation reporting requirements;
- Provide technical assistance to counties to assure the accuracy of work participation data reported to the ACF.

At the county level, the SAWS consortia have a structure that is used when new regulations or policies are developed by the State. A Change Review Board, where priorities for automation changes are set based on impact to the client caseload, degree of complexity, and implementation date for the program policy changes, is used. The Change Review Board decides whether the regulatory change can be fully automated, partially automated or not automated using manual workarounds. Each consortium notifies its member counties of the implementation process.

California is currently piloting a data match of active TANF sampled cases to the National Directory of New Hires data. For any matched individuals, State or county staff will verify the employment. Verification consists of contact with the caseworker, employer, recipient and/or use of The Work Number.

3. *Describe the internal controls to control for data errors, including transcription and coding errors, data omissions, computational errors, and compilation errors.*

State staff currently review the data submitted by the counties for inconsistencies and/or errors, including transcriptions and coding errors, data omissions, computational errors, and compilation errors. On-going training sessions will be conducted for State and county staff on the use of the data survey tool, federal work participation elements, and error avoidance.

In the upcoming federal fiscal year, California will deploy a new web-based data survey tool with enhanced edits to further prevent inconsistent or inaccurate work participation data from being transmitted to ACF.

4. *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.*

The State, while working to improve the Q5i data collection process, has developed business and skip rules within the new data collection software program to address electronic systems and programming errors with the data collection application. State staff monitor monthly samples to ensure that software is correctly pulling the primary and secondary samples. Some data elements, especially those not applicable in California (e.g., Non-custodial Parent Indicator), are automatically populated with an appropriate response.

At the county level, the SAWS consortia have several methods to isolate system or programming errors and ensure that data is consistent. First, there is a county help desk process. At the local level, when users identify an error, they submit trouble tickets and the help desk analyst determines if it is a user error or system software error. If it is a software error, it is escalated from the county to the Project Help Desk. It is researched and if the issue is determined to be the result of a system defect, there is an analysis of the magnitude and a system fix is developed, tested, and scheduled for release.

In addition, an alert system has been built into the application. There are daily, weekly, and monthly alerts of anomalies or potential user errors. These alerts are accessed by the worker, supervisor, and manager. There is also an escalation process that is built into the consortia systems when action is not taken.

Reporting forums exist, such as the Management Reporting Subcommittee, where reports are reviewed and validated among the consortium counties. The subcommittee and related work groups meet on a regular basis. Findings and notes are posted on a website for county use.

5. *Describe any sampling and estimation techniques employed in data validation. Document the soundness of all statistical procedures utilized in the verification process. Fully describe all reasonable estimation techniques. For estimates based on sampling or other statistical techniques, include the step-by-step computations of precision, affirming that the produced estimates are within statistically acceptable levels of reliability and validity.*

In addition to the electronic and manual processes for ensuring the accuracy of the work participation data, the Department will phase in other internal control procedures that will be in place by September 30, 2007. It is anticipated that state staff will review approximately 75 percent of the federally sampled cases to provide technical assistance and guidance for work participation reporting as well as to validate the accuracy of the data. This will be accomplished through an electronic and manual review of cases and site visits.

VI. VERIFICATION OF OTHER DATA USED IN CALCULATING THE WORK PARTICIPATION RATE

In addition to the work activities, the following data elements are used in calculating the work participation rates:

Reporting Month	Family Affiliation Code
Stratum	Non-custodial Parent Indicator
Case Number	Date of Birth (Adult)
Disposition	Relationship to Head-of-Household
Type of Family for Work Participation	Parent with Minor Child
Amount of Food Stamps Assistance	Work-Eligible Individual Indicator
Receives Subsidized Child Care	Date of Birth (Child)
Amount of TANF (& SSP-MOE) Assistance	

Information for five of the data elements (Reporting Month, Stratum, Case Number, Date of Birth (Adult) and Date of Birth (Child)), is automatically loaded from information provided by SAWS. The remaining data is manually entered by State and county reviewers.

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

For each of the data elements listed above, electronic and manual reviews of case files are completed by state and county staff.

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

State staff review the data for inconsistencies and/or errors prior to final submission to ACF. If necessary, the case is discussed with and/or returned to the county to ensure that the data reported is accurate based on the information obtained from the case file and/or collateral contacts with the recipient, employer, service provider, etc.

Work Participation Status

1. *Describe the State's 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.*

Counties have been provided instructions, including definitions, on reviewing cases for federal data reporting purposes. Included in these instructions is information on the limitations for single custodial parents with a child less than one year of age. In addition, training is provided to counties to ensure consistency and accuracy.

In addition, the consortia are programmed to adhere to State regulations, and automatically exempt a single custodial parent with a child less than one for a maximum of 12 months. They provide an area to record exemption only once per lifetime based on a unique identifier of the individual. This information may also be helpful in ensuring the family is not disregarded for more than 12 months per lifetime.

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.*

County and State staff have been provided instructions and training on reviewing cases for federal data reporting purposes. Based on information received from ACF on the federal reporting of sanctioned cases, the limit of three months in 12 consecutive months did not previously apply to sanctioned cases in California because the adult was not aided and was removed from the assistance unit. However, beginning with the October 2006 sample, these cases will be reported to ACF based on modified business rules, edits, and instructions that have been provided to the data reporting staff. In addition, training is provided to further support these changes.

3. *Describe the State's procedures for ensuring a family deemed engaged in work based on 20 hours of participation in countable work activities meets the requirements of a single custodial parent or caretaker relative with a child under age six.*

The State currently has processes in place to ensure that single custodial parents with a child under age six are meeting the federal requirements. As with other populations, the State has established business rules, edits, and written instructions that assist in the provision of accurate data. The October 2006 sample will incorporate these processes to accurately collect data based on the new federal rules. In addition, it is anticipated that the case reviews that will begin in Federal Fiscal Year 2008, will assist in accurately reporting data regarding this population.