



Minnesota Department of **Human Services**

# **Minnesota Work Participation Rate Documentation Review Report**

## **Temporary Assistance for Needy Families (TANF)**

**July-Sept. 2013 quarter, FFY 2013**

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### ***Terminology Disclaimer***

*The terminology used to describe people we serve has changed over time. The Minnesota Department of Human Services (DHS) supports the use of "People First" language. Although outmoded and offensive terms might be found within this document, DHS does not endorse these terms.*

# Table of Contents

<b>EXECUTIVE SUMMARY</b>	3
<b>Section I: Background</b>	4
TANF Work Verification Requirements	4
Minnesota’s Verification Process	4
Sample Selection	4
Table 1: Number and Percent of Sampled Cases by County	5
Review Process	5
<b>Section II: Review Findings</b>	7
<b>A. Findings Summary</b>	7
Table 2: Impact of Findings on WPR Reporting	7
Figure 1: Review Results of Sampled Cases (n=68)	8
Table 3: Errors in Incorrect Cases	8
<b>B. Case Error Details</b>	9
<b>Zero Hour Cases (n=18)</b>	9
Table 4: Zero Hour Case Findings and Error Details	9
Case Management for Correct Zero Hour Cases	10
Table 5: How Correct Zero Hour Cases were Handled for Engagement	11
Scope of Review and Length of Time as a Zero Hour Case	11
Table 6: Months as a Zero Hour Case	11
<b>Work Benefit Cases (n=8)</b>	12
Table 7: Work Benefit Case Findings and Error Details	12
<b>MAXIS-Only Cases (n=23)</b>	13
Table 8: MAXIS-Only Case Findings and Error Details	14
<b>ES-Only Cases (n=13)</b>	15
Table 9: ES-Only Case Findings and Error Details	15
<b>MAXIS/ES Cases (n=6)</b>	18
Table 10: MAXIS/ES Case Findings and Error Details	18
<b>C. Impact of Errors on the Work Participation Rate</b>	20
Table 11: Review Determination of Sampled Cases in WPR Report (n=68)	20
<b>Section III: Conclusion</b>	21
<b>Section IV: Attachments</b>	
Attachment A: Review Recommendations	22
Attachment B: Statewide Corrective Action Process	24
Attachment C: MFIP Activity Guide Tip Sheet	26
Attachment D: Tips for Work Benefit (WB) Cases	28

## Executive Summary

Temporary Assistance for Needy Families (TANF) regulations require states to develop a work verification plan, and monitor participants' engagement in work activities to verify hours of participation. The Minnesota Department of Human Services (DHS) conducts quarterly documentation reviews of a stratified random sample of 68 cases submitted in federal Work Participation Rate (WPR) data reporting, and publishes quarterly and annual reports of review findings. All 68 cases were included in the federal WPR denominator because each case included a work eligible individual (WEI). The sample includes 50 cases with at least one hour of core and/or non-core activity, and 18 cases with zero countable hours in one or more months in the sampled quarter. This is the last quarterly report for FFY 2013, covering the July to September 2013 quarter.

Key findings from this quarter's review of the 68 sampled cases are highlighted below:

- Twenty-five of Minnesota's 87 counties (29 percent) were represented in this quarter's sample of 68 cases. Fifty-four percent of sampled cases were reported as meeting the required hours of participation in federal WPR reporting (included in the numerator value of the WPR). The remaining 46 percent were reported as not meeting the required hours of participation.
- The documentation review found that, of the 68 cases sampled, 36 cases (52.9 percent) were correct for documentation of hours and had no error findings. Thirty-two cases (47.1 percent) had at least one documentation error including:
  - Twenty-two cases (32.4 percent) had errors that did not impact the federal work participation rate, but had discrepancies in the number of hours submitted in WPR reporting.
  - Ten cases (14.7 percent) should not have been reported as meeting required hours of participation (did not have enough documented hours).
- Of the 18 zero hour cases, 13 had no documentation errors. Of the five error cases, two had earned income documentation in the case file, but hours were not recorded in MAXIS; in two cases, financial workers failed to code MAXIS for Family Stabilization Services (FSS) eligibility; in the fifth case, the employment services (ES) worker failed to follow through to obtain FSS documentation. In addition,
  - For the 13 zero hour cases with no documentation errors, the cases remained zero hour, ranging from one to seven months.
  - Nearly 54 percent (seven) of the 13 cases with no documentation errors had no engagement (no counted or non-counted hours coded).

The Minnesota Department of Human Services continues to disseminate information (manuals, trainings, reports and presentations) to assist county financial workers and employment services workers to correctly document and report participant activities. Each quarter, county-specific reports are provided on case findings, along with tip sheets and other resources to coach workers on error findings and improve overall documentation and reporting.

## **Section I: Background**

### **Temporary Assistance for Needy Families Work Verification Requirements**

The Temporary Assistance for Needy Families (TANF) Work Participation Rate (WPR) is the federally mandated work performance requirement for states that have a TANF program. Minnesota's TANF program is the Minnesota Family Investment Program (MFIP).

The WPR was established under the federal Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996, along with penalties and incentives for states. The federal Deficit Reduction Act of 2005 (DRA), also known as TANF Reauthorization, included changes to TANF Work Participation Rate rules.

TANF regulations require states to develop a work verification plan, and monitor participants' engagement in work activities to verify hours of participation.<sup>1</sup>

### **Minnesota's Verification Process**

The Minnesota Department of Human Services, Economic Assistance and Employment Supports Division (EAESD) is responsible for monitoring and reviewing statewide random samples of TANF cases submitted in federal WPR reporting each quarter.

Refer to [Bulletin #12-03-01](#), "DHS Changes Statewide Reviews of Temporary Assistance for Needy Families (TANF) Cases," April 27, 2012, for more information on the review process.

"[The MFIP Employment Services Manual](#)"<sup>2</sup> (MFIP ES Manual) includes the "MFIP Activity Daily Supervision, Documentation and Verification Guide" in Appendix E. The guide shows documentation requirements for both MAXIS and Employment Services activities. The review process uses this primary resource as guidance in determining if case file documentation and verification meet federal requirements. The review examines financial and employment services files, and supporting documentation of hours for cases in the selected review month.

### **Sample Selection**

In the July-September 2013 quarter, DHS staff reviewed a statewide stratified random sample of 68 TANF and Work Benefit (WB) cases reported in the federal WPR denominator in the review quarter. The sample was stratified to include 50 cases with at least one hour of core and/or non-core activity (eight WB cases), and 18 cases with zero countable hours in one or more months in the review quarter.

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<sup>1</sup> The specific regulation pertaining to the documentation auditing process is 45 CFR 261.62 (b)(5).

<sup>2</sup> Available at: [http://www.dhs.state.mn.us/main/id\\_016957](http://www.dhs.state.mn.us/main/id_016957).

Twenty-five counties were represented in the sample. The number of sampled cases by county is shown in Table 1.

Table 1: Number and Percent of Sampled Cases by County

County	Cases	Percent	County	Cases	Percent
Anoka	5	7.4%	Olmsted	1	1.5%
Becker	2	2.9%	Pine	1	1.5%
Benton	2	2.9%	Ramsey	8	11.8%
Blue Earth	1	1.5%	St. Louis	1	1.5%
Cass	1	1.5%	Scott	2	2.9%
Dakota	5	7.4%	Sherburne	1	1.5%
Goodhue	1	1.5%	Sibley	1	1.5%
Hennepin	22	32.4%	Stearns	2	2.9%
Itasca	2	2.9%	Waseca	1	1.5%
Le Sueur	1	1.5%	Washington	2	2.9%
McLeod	1	1.5%	Wright	1	1.5%
Nicollet	1	1.5%	Yellow Medicine	1	1.5%
Nobles	2	2.9%			
Total			25 counties	68	100%

## Review Process

Reviewers copied file data onsite in Hennepin and Ramsey counties, while the other counties in the sample sent their TANF financial and employment services case files to DHS.

During the verification process, reviewers compared documentation in the case file for participant's hours against what was submitted in federal TANF reports (based on data from MAXIS<sup>3</sup> and Workforce One<sup>4</sup>). A case has no documentation error if all countable activities for the review month are correctly documented. If a case has both MAXIS and Employment Services countable activities for the review month, both MAXIS and ES must have the correct documentation to substantiate the reported hours.

<sup>3</sup> The MAXIS system is used by county financial assistance staff to enter MFIP eligibility information, including earned income and the number of hours of paid employment. It is also used by county financial assistance staff to enter eligibility information, including income and the projected number of paid employment hours for the (Minnesota) Work Benefit Program, which began Oct. 1, 2009.

<sup>4</sup> Minnesota Workforce One (WF1) is a case management system used to track client activity in state-funded employment and training programs and many locally funded programs. The system is administered by the Minnesota Department of Employment and Economic Development (DEED) and used by state, county and private nonprofit service providers. The WF1 system is used by MFIP employment services providers to record participant employment services activity, including recording the hours of participation in non-paid employment services activities, in-kind work and school attendance for teen parents.

After case reviews are completed, a detailed report is generated for each case and sent to the respective county for analysis, which consists of a:

- Cover letter and review findings information sheet providing definitions and information on the summary and individual reports in the packet
- County summary (MAXIS summary, Employment Services summary and Employment Services summary by provider)
- Case list with individual review results
- Detailed individual findings report for each case reviewed (MAXIS information and Employment Services information) that should be in each case file.

County agency staff are encouraged to examine the assessment and review determination of cases, and share the results with financial workers and the respective Employment Services provider. County agencies are encouraged to respond with challenges or questions regarding review findings. All feedback is reviewed; the final determination of each case is validated before the data is aggregated, analyzed and published in quarterly reports.

## Section II: Review Findings

### A. Findings Summary

This section discusses the cohort of cases sampled, and errors associated with an incorrect case. A case is counted as incorrect only once, even if there is more than one MAXIS and/or ES error. The type of error(s) that led to a determination that a case is incorrect could be MAXIS, ES or both.

Of the 68 cases in the sample, 36 (52.9 percent) were correct, meeting documentation requirements; 32 (47.1 percent) were incorrect with at least one error finding.

Among the 32 cases that had at least one documentation error, 10 cases had errors that would have changed the status of meeting or not meeting required hours of participation. Details are noted below and summarized in Table 2:

- Twenty-two cases (32.4 percent) had errors that did not impact the federal Work Participation Rate, but had discrepancies in the number of hours submitted in federal reporting.
- Ten cases (14.7 percent) should not have been reported as meeting required hours of participation (did not have enough documented hours).

Table 2: Impact of Findings on WPR Reporting

Impact on WPR Reporting	Percent
<b>Correct findings</b> Hours correctly reported (36 cases or 52.9 percent)	52.9%
<b>Incorrect findings</b> Hours reported were incorrect but did not impact the WPR (22 cases or 32.4 percent)	47.1%
Hours reported as meeting required hours of participation, but did not (10 cases or 14.7 (percent)	
<b>Total (68 cases)</b>	<b>100%</b>

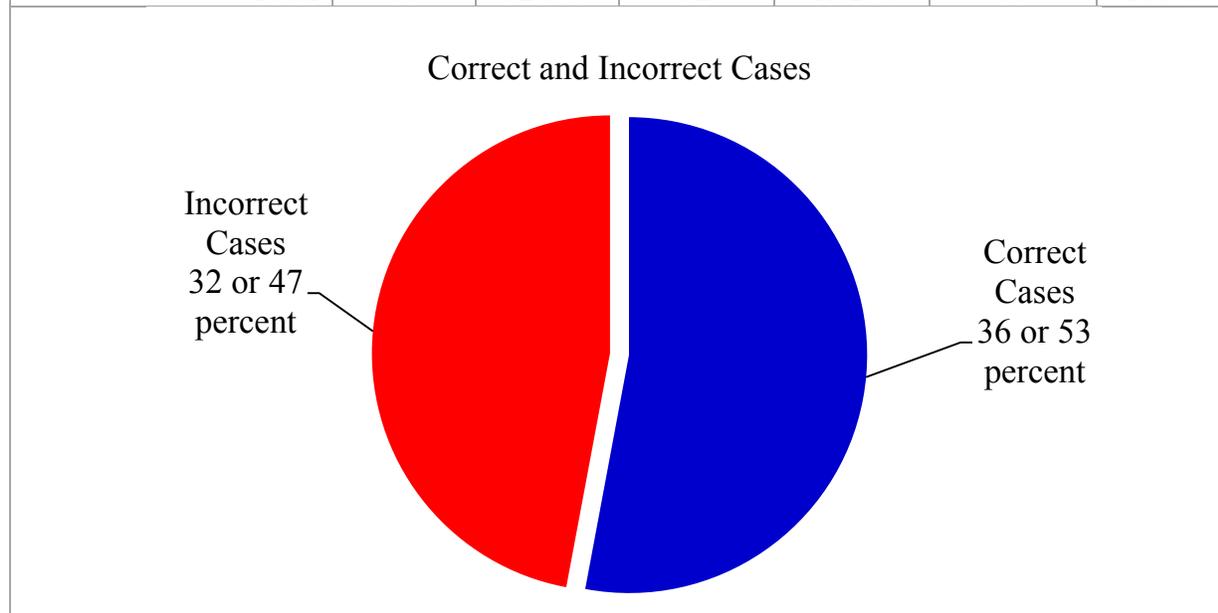
Among the case types reviewed in the sample for documentation of hours in the review month:

- Thirteen of the 18 (72 percent) zero hour cases were correct
- Fifteen of 23 (65 percent) MAXIS-only cases were correct
- Four of six (67 percent) MAXIS/ES cases were incorrect
- Nine of 13 (69 percent) ES-only were incorrect
- Six of eight (75 percent) WB cases were incorrect.

The review results by case type are summarized and illustrated in Figure 1:

Figure 1: Review Results of Sampled Cases (n=68)

Case Types Reviewed	Correct Cases		Incorrect Cases		Total	
	Number	Percent	Number	Percent	Number	Percent
Zero Hours	13	72.2%	5	27.8%	18	100%
WB (MAXIS only)	2	25.0%	6	75.0%	8	100%
ES-only	4	30.8%	9	69.2%	13	100%
MAXIS-only	15	65.2%	8	34.8%	23	100%
MAXIS/ES	2	33.3%	4	66.7%	6	100%
<b>Total</b>	<b>36</b>	<b>52.9%</b>	<b>32</b>	<b>47.1%</b>	<b>68</b>	<b>100%</b>



Incorrect cases could have either MAXIS or ES errors, or both. The 32 incorrect cases, as shown in Figure 1, had 50 errors; 27 were MAXIS and 23 were ES. The number of errors by case type is shown in Table 3:

Table 3: Errors in Incorrect Cases

Case Types	Incorrect Cases	MAXIS Errors	ES Errors	Total
Zero Hours	5	5	1	6
WB	6	6	-	6
ES-only	9	-	17	17
MAXIS-only	8	12	-	12
MAXIS/ES	4	4	5	9
<b>Total</b>	<b>32</b>	<b>27</b>	<b>23</b>	<b>50</b>

## B. Case Error Details

### Zero Hour Cases (n=18)

The sample included 18 non-countable (zero) WPR hour cases reported under TANF federal reporting, considered non-MAXIS/non-ES activity cases for this review. The zero hour cases are in the denominator of the federal WPR and have zero countable WPR hours reported for the review month, but can have non-countable hours such as job search hours that are reported as “other” work activities (the total hours are less than TANF required hours), and cases that only have assessment and other activities reported under the “other activity” category.

Because the review focus is to verify documentation of federally reported WPR hours, most of the zero hour cases are considered correct for the review month for the purpose of this review. However, reviewers found case management problems for some cases. These problems could include financial worker failure to do an ES referral or not doing it in a timely manner, lack of timely assessment for Family Stabilization Services (FSS), failure to sanction timely, as well as other case management and engagement issues.

Thirteen of the 18 zero hour cases had no documentation errors (Table 4). Of the five cases with errors, two had earned income documentation in the case file but the hours were not recorded in MAXIS; in two cases, financial workers failed to code MAXIS for FSS eligibility; in the fifth case, the ES worker failed to follow through to obtain FSS documentation.

Table 4: Zero Hour Case Findings and Error Details

#### Case findings

Thirteen (72.2 percent) cases had correct findings

Five (27.8 percent) cases had incorrect findings, with six errors (five MAXIS, one ES).

#### Error details

Case one (two MAXIS errors)—zero hours were reported, but 17 verified for the July 2013 review month. There were 17 hours of paid employment for the review month that were not reported for the WPR. One of the errors cited was the result of earned income documentation in the case file but not recorded in MAXIS. The other error was for incomplete documentation of work hours. The financial worker failed to require further information from the employer to establish when the participant received her final pay, which meant there might have been additional income and hours in the review month. This case was not in the numerator value of the WPR; the change would impact only the total number of hours reported.

Case two (one MAXIS error)—zero hours were reported, but 49 hours verified for the August 2013 review month. During the review, documentation in the case file showed 49 hours of paid employment for the review month not reported for the WPR. The financial worker mistakenly deleted the October 2013 JOBS panel that included the 49 earned income hours. It is not clear why the JOBS panel was deleted, but in doing so, the August hours were no longer available to be captured for the WPR. This case was not in the numerator value of the WPR; the change impacted only the total number of hours reported.

Table 4: Zero Hour Case Findings and Error Details

Case three (one MAXIS error)—Zero hours were reported during the review month of September 2013, but the review cited an error for failure to code MAXIS for FSS. The financial worker received notice via email stating the participant will receive Supplemental Security Income (SSI) effective in July, therefore, was removed from the MFIP grant for July. In August, the worker received verification that the client received a lump sum payment from SSI in June, effective on July 13 payment for SSI. There was also verification that the participant received ongoing payments from (Retirement, Survivors, and Disability Insurance (RSDI). However, the worker did not update the STAT/UNEA panel in MAXIS and the RSDI unearned income was not budgeted for August, September and October 2013. An MFIP overpayment should have been calculated. The worker also did not code FSS when MFIP was reapproved in August. The case should have been coded FSS and followed up with a status update to ES. Had the case been coded for FSS, it would not have been included in the WPR calculation.

Case four (one ES error)—zero hours were reported, but the review found that the ES worker failed to follow through to obtain FSS documentation. The ES worker requested that an evaluation be done for the participant. The evaluation was done in July, but the medical documentation for FSS was not received until December, when the ES worker noticed documentation was not received, and requested it again. Had the documentation been received in July, this case could have been coded FSS for August or September, at the latest, and would not have been included in the WPR.

Case five (one MAXIS error)—zero hours were reported during the review month of September 2013, but the review cited an error for failure to code MAXIS for FSS. The case was not identified and properly coded in MAXIS for FSS. At application for MFIP on September 18, written verification was provided from the Social Security Administration of application for Social Security Disability benefits on September 13. MFIP was approved September 19, and the participant was referred to ES on the same date. The county agency failed to code MAXIS for FSS (category: SSI/RSDI pending), and did not note the participant's application for disability benefits in the referral sent to the ES provider. If the case had been coded as FSS, it would not have been considered a TANF case, and not included in the WPR calculation.

### **Case Management for Correct Zero Hour Cases**

Thirteen zero hour cases had no documentation errors. The review found that most cases (n=9) were handled correctly for engagement and case management; but a third (n=4) were handled incorrectly by ES workers in the review month (although this did not constitute a documentation error (Table 5).

Table 5: How Correct Zero Hour Cases were Handled for Engagement during the Review Month

Handled Correctly		Review Month Description of Case Management
9 (69%)	ES (7)	<ul style="list-style-type: none"> <li>• County/ES transfer in progress—review month only (one)</li> <li>• Case in process of being, or is currently sanctioned, for the review month (three)</li> <li>• First month on assistance and no work activity assigned—review month (two)</li> <li>• Participant engaged in ‘other’ activities in review month (one).</li> </ul>
	MAXIS (2)	<ul style="list-style-type: none"> <li>• Child under age 1 exemption in effect for review month (one)</li> <li>• MFIP application pending in the review month (one).</li> </ul>
Handled Incorrectly		
4 (31%)	ES (4)	<ul style="list-style-type: none"> <li>• Failure to sanction timely (one)</li> <li>• Failure of ES worker to act on case (three)</li> </ul>

### Scope of Review and Length of Time as a Zero Hour Case

The main scope of documentation reviews is to focus on the review month and report findings about that month. However, to get a count of consecutive zero hour months as shown in Table 6, the review examined the months with zero hours, providing an overall summary of what was observed with case management for these cases. Although some cases were handled correctly in the review month, that may or may not be true for the other months in zero hour status for a given case.

The documentation review identified zero hour cases that remained in zero hour status for several months. For the zero hour cases with no documentation errors (n=13), the cases remained zero hour, ranging from one to seven months. A distribution is presented in Table 6. A zero hour case can have non-countable hours, which reflects some engagement in activities such as assessment, social services, etc. As shown in Table 6, just over half of the 13 cases (53.8 percent) with no documentation errors had no engagement. No engagement means no countable or non-countable hours coded.

Table 6: Months as a Zero Hour Case

Months with Zero Hours	Cases	Type of Engagement	Cases	Avg. Months with Non-countable Hours
1-5 months	12 (92.3%)	No engagement	7	-
		Some engagement	5	1.2
6-12 months	1 (7.7%)	No engagement	-	-
		Some engagement	1	4
<b>Total</b>	<b>13</b>	<b>No engagement</b>	<b>7 (53.8%)</b>	-
		<b>Some engagement</b>	<b>6 (46.2%)</b>	<b>1.7</b>

### **Work Benefit Cases (n=8)**

The Work Benefit program (WB) is a monthly cash benefit for families who have exited the Diversionary Work Program or MFIP and are working a required number of hours with income below 200 percent of the federal poverty guidelines (FPG). To maintain WB eligibility, single caregivers with a child under age 6 must be employed at least 87 hours per month, or 130 hours per month with a child(ren) age 6 or older. In two-parent families, at least one of the parents must be employed 130 hours per month. As a WB reference resource, see Attachment D: Tips for Work Benefit Cases. WB cases are all MAXIS cases in the numerator of WPR reporting.

Of the eight WB cases in the sample, six were incorrect. Five incorrect cases had errors that resulted in a discrepancy of hours submitted in federal reporting, but the errors did not impact the WPR. One case had errors and should not have been reported as meeting required hours of participation for the WPR. The review results and error details for WB cases are summarized in Table 7:

Table 7: Work Benefit Case Findings and Error Details

#### **Case findings**

Two (25 percent) had correct findings

Six (75 percent) had incorrect findings with six MAXIS errors.

#### **Error details**

Case one (one MAXIS error)—160 hours were reported, but zero verified. For the review month July 2013, the WB program was open, and 160 hours reported for WPR. A review was done on this case in May, but no income was requested for the review for Medical Assistance (MA) and Supplemental Nutrition Assistance Program (SNAP). Since the JOBS panel was updated May 23, but no income was requested, an error was cited during the review for the 160 hours that were prospected for the review month. This case should not have been reported as meeting required hours of participation for the WPR.

Case two (one MAXIS error)—148 hours of paid employment were reported, but 157 were verified for the review month of September 2013. The financial worker did not use the most current income/hours. Paystubs for July and August were submitted for review and the worker used the average to update the WB budget. WB policy states that the most current actual income/hours should be used to calculate eligibility; the worker should only use pay stubs from the most current month (not combine pay stubs from two months). Total hours for the review month using the most recent pay stub totaled 157. This was a WPR numerator case and the change did not affect numerator status.

Case three (one MAXIS error)—240 paid employment hours were reported, but 160 were verified for the review month of August 2013. The financial worker calculated income/hours based on information provided by the employer on an Employment Verification Form received June 25. The participant was expected to work 40 hours a week and would be paid bi-weekly on Fridays. For the review month, the county agency calculated the income correctly. However, it was the 240 hours entered on the JOBS panel that was incorrect. WB policy states to enter income from a third or fifth paycheck, but not the hours. Entering the hours from the

Table 7: Work Benefit Case Findings and Error Details

third or fifth paycheck would give an inaccurate picture of projected work hours. This was a WPR numerator case; the change did not affect numerator status.

Case four (one MAXIS error)—119 paid employment hours were reported, 128 verified for the review month of July 2013. The county agency received earned income for April on May 15 but the financial worker did not update the budget with the new income/hours. Although it is not necessary for the participant to submit earned income information on a monthly basis for WB, the budget should be updated whenever participant submits new information on earned income. Given the most recent earned income information, the total hours would be 100, not 119. This was a WPR numerator case and the change did not affect numerator status.

Case five (one MAXIS error)—152 hours were reported, but 437 were verified for the review month of September 2013. The WB budget was calculated on July 27 for the initial WB month of June. There were no case notes specifying which income and hours were used to project for WB. It appeared that the worker used April income and hours that had been used to calculate SNAP benefits. However, the May income and hours were the most current on file at the time of the approval of WB, and per policy, should have been used to calculate WB eligibility. Using the May income, the total hours for May were calculated to be 437. It was not clear during the review if these were actual hours worked or pay from a previous month. Had the May income been used to calculate WB, the financial worker would have needed to clarify why so many hours were showing on pay stubs. There were five checks received in May, for a total income of \$5,907, and hours were 437 (per WB policy, the hours from the fifth paycheck are dropped when projecting hours). This income makes the participant ineligible for WB.

Case six (one MAXIS error)—139 hours of paid employment were reported but 141 verified for the review month of August 2013. The initial month of WB was July; it was approved August 1 using the earned income received in May. The financial worker received two pay stubs in May with 67 and 73.5 hours, for a total of 140.5 hours or 141 after rounding up. WB policy states that the most current actual income/hours should be used to calculate eligibility. It appears the financial worker averaged the income and hours to calculate WB eligibility. This was a WPR numerator case and the change did not affect numerator status.

### **MAXIS-only Cases (n=23)**

MAXIS-only cases are those with paid employment with at least one countable hour for the WPR. Of the 68 cases, 23 were MAXIS-only cases (34 percent). Fifteen of the 23 cases were correct. Seven of the eight cases had documentation errors that resulted in a discrepancy of hours submitted in federal reporting, but the errors did not have a direct impact on the Work Participation Rate. One case should have been excluded from WPR calculation as the financial worker failed to code for FSS eligibility. The review results and error details for MAXIS-only cases are summarized in Table 8.

Table 8: MAXIS-only Case Findings and Error Details

**Case findings**

Fifteen (65 percent) had correct findings

Eight (35 percent) had incorrect findings, with 11 MAXIS errors.

**Error details**

Case one (three MAXIS errors)—143 hours reported (99 paid employment and 44 self-employment hours), but 171 verified during the review month of August 2013. The review verified 111 paid employment and 60 self-employment hours. The three errors cited were self-employment income incorrectly applied; hours recorded were inconsistent with documentation in the case file; and, computational error. This was a WPR numerator case and the change did not have affect numerator status.

Case two (one MAXIS error)—148 self-employment activity hours were reported, but 132 verified for the review month of September 2013. During the review, it was determined that the self-employment income was incorrectly applied. The difference in hours was the result of the financial worker not using the rolling average to calculate the participant's counted self-employment income used for budgeting, and for determining the hours reported for the WPR. This was a WPR numerator case and the change did not affect numerator status.

Case three (one MAXIS error)—191 paid employment hours were reported but 152 verified for the review month of July 2013. During the review, it was determined that the hours recorded in MAXIS were inconsistent with documentation in the case file. There were four pay stubs on file totaling 152 hours. It is unclear how the financial worker computed 191 hours. This was a WPR numerator case and the change did not affect numerator status.

Case four (one MAXIS error)—86 paid employment hours were reported but 109 verified for the review month of September 2013. During the review, it was determined that the hours recorded were inconsistent with documentation in the case file. Two pay stubs were found on file totaling 109 hours. It is unclear how the financial worker computed 86 hours. This was a WPR numerator case and the change did not affect numerator status.

Case five (one MAXIS error)—111 paid employment hours were reported and 111 verified, but the review found the case should have been coded for FSS eligibility for the review month of August 2013. A status update had been sent from the ES worker to the financial worker, but the case was not updated with this change. The participant spoke with the financial worker on August 14 and stated that she was at St. Anne's, due to domestic violence. The financial worker stated in case notes that the participant should have reported this. Documentation found during the review showed that the participant did report this in January 2013 to the ES worker, and the ES worker reported it to the financial worker. This case should not have been included in the WPR; it should have been coded FSS for family violence waiver.

Case 6 (one MAXIS error)—223 paid employment hours were reported but 133 verified for the review month of July 2013. The hours reported were prospective hours derived from two jobs. In job one, the hours entered should have been 60, but worker entered 83. The financial worker

Table 8: MAXIS-only Case Findings and Error Details

incorrectly used May wages/hours for the July prospective budget instead of using June's wages/hours. Similarly, in job two, by the time the July prospective information was entered, the participant had already submitted her pay stubs for June. Since this was the most recent information in the case file, and a more accurate depiction of what to expect, the June pay stubs should have been used. This was a WPR numerator case and the change did not affect numerator status.

Case 7 (two MAXIS errors)—109 paid employment hours were reported but 108 verified for the review month of September 2013. Two errors were cited during the review: incomplete documentation of work hours (missing a pay stub(s) or other employer produced documents, and rounding error in the calculation of paid employment hours. This was a WPR numerator case and the change did not affect numerator status.

Case 8 (one MAXIS error)—56 paid employment hours were reported, but 74 verified during the review month of August 2013. A math error was cited during the review. It is unclear how the financial worker computed 56 hours. The YTD were used to calculate the August 27 gross income and hours. The hours totaled 74. This case was not in the numerator value of the WPR and the change did not affect the WPR.

### **ES-only Cases (n=13)**

There were 13 ES-only cases in the sample. Four of the 13 cases had correct findings and nine had documentation errors, including the following:

- Seven should not have been reported as meeting the required hours of participation (did not have the required number of verifiable participation hours)
- Two had errors, but the errors had no direct impact on the Work Participation Rate, but resulted in a discrepancy of hours submitted in federal reporting.

The review results and error details for ES-only cases are summarized in Table 9:

Table 9: ES-only Case Findings and Error Details

#### **Case findings**

Four (30.8 percent) had correct findings

Nine (69.2 percent) had incorrect findings, with 17 ES errors.

#### **Error details**

Case one (three ES errors)—100 hours of training (13-24 months) activity were reported but zero verified for the review month of July 2013. Three errors were cited during the review: Missing one or more time sheet(s) or activity logs(s); ES failure to notify county agency of FSS eligibility; and employment services activity documentation/verification errors. Per WPR requirements, online programs are allowed when the program has mechanisms for providing reports that document the actual time participant is accessing an online training program; OR the online program is conducted in a supervised setting. The weekly attendance logs submitted by the participant did not indicate that the class time for the online course was conducted in a

Table 9: ES-only Case Findings and Error Details

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supervised setting. None of the class time or study time reported for the review month was allowed during the review. The ES worker also failed to notify the county of FSS eligibility in a timely manner. At that time, an employment plan was updated, a Family Violence Waiver was reviewed, and a status update was sent to the financial worker to extend the waiver until June 27. The participant has been on a Family Violence Waiver since November 2010 and has been working with an advocate. The waiver ended June 30, 2013, and the financial worker sent a status update to the ES worker. The ES worker met with the participant on July 1 but did not address the Family Violence Waiver. On July 30, the ES worker spoke with the participant via telephone and scheduled an appointment for August 2 to review the waiver and meet with the advocate. They met on August 5, updated the waiver, and sent a status update to the financial worker. The financial worker updated the MAXIS panels and the waiver was approved for August. The ES worker should have addressed the waiver prior to the end date of June and notified the financial worker in a timely manner of FSS eligibility. Given the documentation errors, this case should not have been reported as meeting the required hours of participation in the WPR.

Case two (one ES error)—140 hours of training were reported, but 21 verified for the review month of July 2013. It was determined that the hours recorded were inconsistent with documentation in the case file. During the review, an attendance log was on file that had only 21 hours for July, not 140. Given the documentation errors, this case should not have been reported as meeting the required hours of participation in the WPR.

Case three (three ES errors)—87 hours of job search activity were reported but 59 verified during the review month of August 2013. Three errors were cited during the review: Missing information on the job search activity log; hours recorded under the wrong activity; and employment services data discrepancy errors. Some hours were not accepted because the participant did not indicate what employers was part of her networking, or to which employers applications were submitted. The participant indicated that she called employers but did not list any on the log. Hours recorded for doing a daycare search were not accepted during the review as this is not job search activity. If this was included in the employment plan, this activity would have been entered on WF1 under other activity. Given the documentation errors, this case should not have been reported as meeting the required hours of participation in the WPR.

Case Four (one ES error)—105 training activity (13-24 months) hours were reported, but zero verified for the review month of September 2013. All of the participant's Fall semester classes were online courses. When a student is enrolled in online courses, the hours are accepted when the training program has mechanisms for providing reports that document the actual time a participant is accessing the online training program, OR, the online training program is conducted in a supervised setting, AND, daily supervision is provided by the course instructor or other responsible individual who is overseeing participant's online course work and progress. The participant submitted the usual paper attendance log which is sufficient when classes are held in a room at the school with the instructor present. The information on the log did not provide the necessary information as described above when the classes are online. (For further information, refer to the MFIP-ES Manual, Appendix E, MFIP Work Activity Daily Supervision, Documentation and Verification Guide.) Given the documentation errors, this

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Table 9: ES-only Case Findings and Error Details

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case should not have been reported as meeting the required hours of participation in the WPR.

Case five (one ES error)—87 hours were reported (79 job search and eight holiday hours), but 84 verified for the review month of September 2013. The ES worker recorded eight holiday hours; however, according to the employment plan, the participant is only required to job search five hours per day, so only five hours of holiday can be allowed (reference ES Manual 9.48). Given this error, this case should not have been reported as meeting the required hours of participation in the WPR.

Case six (two ES errors)—155 training (13-24 months) hours were reported, but 48 verified for the review month of July 2013. Two errors were cited during the review: Missing statement from school specifying recommended amount of study time, and holiday hours incorrectly used/calculated. The participant was registered for three online courses and provided a class schedule. The ES worker coded five holiday hours for week one of the review month. However, the participant did not start classes until July 8; therefore, these hours are not allowed. There was no study statement from the school about the recommended amount of study time for the classes/program. To allow study time, a statement from the school must be on file; therefore, the study time cannot be allowed. The participant turned in three separate monthly attendance forms for each of her classes and each was signed by the course instructor. The class time listed on each log for a total of 48 hours was accepted.

*Note on study time documentation:* With a statement from the school about recommended study time, one hour of unsupervised study time per class hour can be allowed. More than one hour per class hour needs to be supervised and requires a signature from a responsible individual acknowledging study was supervised (cannot exceed the amount of study time advised by the school). Given this error, this case should not have been reported as meeting the required hours of participation in the WPR.

Case seven (three ES errors)—87 job search hours were reported but zero hours verified for the review month of July 2013. Three errors were cited during the review: Missing ES provider method of bi-weekly verification of at least one job contact; missing signature of ES worker or other individual who oversees job search/job readiness; and no documentation that weekly check-in meetings occurred. There were 91 hours recorded on WF1 for job search activity, but only 87 hours were reported for the WPR; the remaining four hours were reported as "Other work activities." The participant completed and turned in job search logs for weeks one, two, three and four of the review month, but were all incomplete. In one or more of those weeks, there were no bi-weekly verifications, the box indicating a bi-weekly verification was checked but no indication what job was verified; no weekly check-in; or was missing the signature of the ES worker. Eight excused hours were entered in WF1, but there was no case note in the file indicating why that was given. Given the documentation errors, this case should not have been reported as meeting the required hours of participation in the WPR.

Case eight (two ES errors)—24 ESL activity hours were reported but 26 verified for the review month of August 2013. Two errors were cited during the review: Rounding error (Employment Services Manual 9.47) and ES data discrepancy errors. For week one, there were zero hours reported on WF1. However, the review found an activity log in the case file for four hours that were mistakenly coded July instead of August. For each of weeks two and three, the

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Table 9: ES-only Case Findings and Error Details

activity log indicated 11 hours and 25 minutes. The ES worker rounded to 12 hours. According to the MFIP ES Manual 9.47, in this case, the ES worker should round down to the nearest whole number, if the number of partial hours a participant was engaged in unpaid activity is from 00.01 to 00.49. This case was not in the numerator value of the WPR and the change would only have impacted the hours reported, not the WPR.

Case nine (one ES error)—four hours of training ( $\leq 12$  months) activity were reported but six verified for the review month of August 2013. The difference in hours was the result of the ES worker not allowing two hours of training activity that occurred in week three. The two hours were recorded by the participant on the school attendance log as the class final. There was no explanation given by the ES worker as to why these two hours were not allowed. This case was not in the numerator value of the WPR and the change would only have impacted the hours reported, not the WPR.

### **MAXIS/ES Cases (n=6)**

There were six MAXIS/ES cases in the sample. Four cases had documentation errors, two had no errors. Among the four cases with documentation errors:

- Two cases were in the numerator value of the WPR and should not have been reported as meeting required hours of participation; did not have enough verified participation hours
- Two cases were in the numerator value of the WPR, but the change would only have impacted the hours reported; the cases remain in the numerator value of WPR.

The review results and error details for MAXIS/ES cases are summarized in Table 10:

Table 10: MAXIS/ES Case Findings and Error Details

#### **Case findings**

Two (33.3 percent) had correct findings

Four (66.7 percent) had incorrect findings, with five ES and four MAXIS errors.

#### **Error details**

Case one (two MAXIS errors)—87 hours were reported (80 hours paid employment and seven hours job search), but 76 verified for the review month of September 2013. Of the 80 hours of employment activity reported, 58 were verified. The difference is the result of two separate errors: The first error was inaccurately coding the total number of hours shown on the JOBS panel. The three pay stubs submitted by the participant totaled 58 hours, not 80. The second error was incomplete documentation of work hours. The pay stub of the September 2013 pay date listed YTD gross earnings that implied the potential of another paycheck received on September 6. A MAXIS case note references a discussion between the financial worker and participant about the September 6 paycheck, requesting that participant submit it so that the September – November 2013 budget could be completed. However, there were no further case notes on this, and the November budget was completed on November 8<sup>h</sup> with the income from the above pay dates only. There was an Employment Verification Form submitted November 1 that showed a start date of September 3 but this date appears it was tampered with, and the original date appears to be May 2013. The seven hours of job search were found to be correct.

Table 10: MAXIS/ES Case Findings and Error Details

Given the documentation review errors, this case should not have been reported as meeting the required hours of participation in the WPR.

Case two (one ES error)—130 hours were reported (82 hours paid employment and 48 hours of job search) but 82 hours were verified for the review month of September 2013. The 82 paid employment hours were verified but the review was unable to verify any of the job search hours since no job search logs were found on file. The ES worker also allowed eight holiday hours and eight excused hours. The number of holiday hours that can be reported are the number of hours that person was scheduled to participate for that day. If the participant was to be job searching for four hours per day as is stated on the employment plan, then only four hours of holiday can be coded. If the ES worker allows excused hours, again, only four hours per day would be allowed as that is the number of hours per day of participation. The ES worker needs to document in the case record the day, hours and the purpose for the excused absence, and this was not done for the eight excused hours reported for September. Given the documentation review errors, this case should not have been reported as meeting the required hours of participation in the WPR.

Case three (two ES and one MAXIS error)—87 hours (75 hours paid employment and 12 hours of job search) were reported but 117 verified for the review month of August 2013. Seventy-five hours of paid employment were reported but the review verified 117. The difference in hours was the result of not including the hours of a third pay check received in the review month. The error occurred because the financial worker was using the pay period end date on the pay stubs instead of the actual pay date. For the 12 job search hours (one job search and 11 excused hours) reported, the review verified zero hours. No activity log for any job search activity was found in the case file. In addition, there was no documentation for the 11 hours of excused time and no case notes to explain granting of the excused hours. DHS recommends referring to MFIP-Employment Services Manual 9.48 for information on the correct use of Excused/Holiday hours. This was a WPR numerator case and the change did not affect numerator status.

Case four (two ES and one MAXIS error)—102 hours were reported (80 paid employment and 22 post-secondary Voc/Ed, 13-24 months activity hours) but 110 verified for the review month of August 2013. Eighty hours of paid employment were reported but 99 verified. There were four pay stubs that totaled 99 hours; it was unclear how the financial worker calculated 80. Of the 22 hours reported for Voc/Ed, 11 were verified. The participant turned in a completed attendance log for the week of August 26 – August 30 that included 11 hours of class time, one hour of online class and 10 hours of study time. During the review, no study time was allowed as there was not a school statement in the file specifying the amount of study time required to make satisfactory progress or complete the training program. As indicated on the student schedule, the Thursday class is half in class and half online; the one hour of online class is not allowed as participant should have provided an online log. Therefore, 11 hours of class time is allowed. This was a WPR numerator case and the change did not affect numerator status.

### C. Impact of Errors on the Work Participation Rate

This review findings section provides a final determination summary of the case WPR status based on review findings. All 68 cases were included in the federal Work Participation Rate denominator because each case included a work eligible individual. Cases successfully meeting the required hours of participation were included in the numerator value of the WPR. A summary is provided in Table 11:

Table 11: Review Determination of Sampled Cases in the Work Participation Rate (n=68)

<b>Cases Reported as Meeting the Required Hours of Participation (n=37)</b>	<b>Cases</b>
No documentation errors	13
Documentation errors (but still met required hours of participation)	14
Documentation errors (did not have the required number of participation hours)	10
<b>Cases Reported as Not Meeting the Required Hours of Participation (n=31)</b>	
No documentation errors	23
Documentation errors (but still did not meet the required hours of participation)	8
Documentation errors (met the required number of participation hours)	0
Total	68

## **Section III: Conclusion**

The TANF Work Participation Rate documentation review continues to help clarify and refine policies and procedures for reporting and documenting work activities. This information, along with the statewide corrective action process, shows the importance of accurate and detailed case management.

In this quarter's sample of 68 cases reviewed, 52.9 percent (n=36) were correct for verification of hours reported in the WPR for the review month. These cases had no documentation errors. Thirty-two percent (n=22) had errors but the errors did not have an impact on the federal Work Participation Rate, but had discrepancies in the number of hours submitted in federal reporting. Nearly 15 percent (n=10) had errors and should not have been reported as meeting the required hours of participation (did not have enough documented hours).

More than two-thirds each of WB, ES-only and MAXIS/ES cases were incorrect. There were 27 MAXIS and 23 ES errors in the 32 incorrect cases in the sample. The common MAXIS errors were hours recorded were inconsistent with documentation in the case file; incomplete documentation of work hours; and failure to code MAXIS panels for FSS eligibility. The most common ES errors were hours recorded were inconsistent with documentation in the case file, holiday hours incorrectly used or calculated, and in general, missing various verification documents.

DHS staff encourages county financial and ES workers to review the specific causes of errors noted in this report and implement the recommendations in Attachments A-D. In addition, collaborative efforts and stronger communication among MAXIS and ES supervisors and workers, and between county financial and ES workers can go a long way to address common errors, and improve overall documentation review results and Work Participation Rate reporting.

## **Section IV: Attachments**

### **Attachment A: Review Recommendations**

Based on the MAXIS and ES errors found during documentation reviews, DHS staff provides the following suggestions for county financial and Employment Services workers:

#### **MAXIS:**

- **Pay stubs.** Pay close attention to information on pay stubs and only record income and hours supported with actual documentation (pay stubs, employer statement, etc.) in the month payment was received.
- **Document Work Benefit projected income determination.** Single parent WB cases are included in the TANF Work Participation Rate, therefore, also in TANF Work Participation Rate documentation reviews. Use the most current income/hours on file at the time of WB approval, and clearly document what was used for calculations. If new information becomes available, reassess WB eligibility.

Use the “Combined Manual” and the “Tips for Work Benefit Cases” document (Attachment D) developed from TANF Work Participation Rate documentation review results, available at:

[http://www.dhs.state.mn.us/main/id\\_016956](http://www.dhs.state.mn.us/main/id_016956)  
[http://www.dhs.state.mn.us/dhs16\\_166327.pdf](http://www.dhs.state.mn.us/dhs16_166327.pdf)

#### **Employment Services:**

- **Require participants to provide school statement about recommended amount of study time.** Job counselors must only record documented study time hours when appropriate documentation is provided by the school.
- **Use the DHS school verification form.** DHS-2883, MDHS Request for Verification of School Attendance/Progress - English - 2-09  
<https://edocs.dhs.state.mn.us/lfsrver/Legacy/DHS-2883-ENG>
- **Do weekly check-in meetings and bi-weekly verification of one job contact.** Document in case notes that a weekly check-in meeting occurred. Do a bi-weekly verification of at least one job contact listed on the job search activity log and update the form accordingly.
- **Motivate participants to provide documentation as scheduled.** It is important that participants provide timely activity documentation. Documenting activities and timely submission are transferrable skills, an employer may ask an employment counselor when acting as a reference for participants. Train participants, and use the Notice of Intent to Sanction (NOITS) tool when appropriate.

#### **MAXIS/Employment Services:**

- **Review the manual for policy information.** Review the appropriate manual to clarify correct policy and apply it to a case.

#### MAXIS examples:

- WB—use recent income; do not average income and/or hours; WB requires participants’ paid hours are a minimum of 87 (youngest child less than six years), or 130 hours (youngest child age 6 or older), per month.
- Self-employment—review the Self-employment Handbook (link below) and the policy manuals.  
[http://www.dhs.state.mn.us/dhs16\\_144585.pdf](http://www.dhs.state.mn.us/dhs16_144585.pdf)

ES examples:

- Record hours in Workforce One and under the correct activity.
- **Update county/provider forms and get appropriate signatures.** County and provider forms should contain all the needed data fields to ensure compliance with TANF documentation requirements. The form may need the clients', responsible individuals' and/or job counselors' signatures.
- Review DWP/MFIP Tip Sheets available on CountyLink:  
[http://www.dhs.state.mn.us/main/idcplg?IdcService=GET\\_DYNAMIC\\_CONVERSION&RevisionSelectionMethod=LatestReleased&dDocName=dhs16\\_161174#](http://www.dhs.state.mn.us/main/idcplg?IdcService=GET_DYNAMIC_CONVERSION&RevisionSelectionMethod=LatestReleased&dDocName=dhs16_161174#)

### **Other Recommendations**

#### **Corrective Action**

DHS staff recommend that all county agency staff and ES providers review the TANF Work Participation Rate Documentation Reviews – Statewide Corrective Action Process, available as Attachment B.

#### **Training Opportunities**

- Attend state presentations and training sessions on the WPR, documentation and verification requirements, and Deficit Reduction Act updates.
- County agencies and ES providers with incorrect review findings are encouraged to work with the DHS Economic Assistance and Employment Supports Division (EAESD) consultants to obtain supplemental instructions and technical assistance. Use the central email address to send in non-policy inquiries about DWP, MFIP and WB to: [dhs.dwp-mfip@state.mn.us](mailto:dhs.dwp-mfip@state.mn.us).

Examples of inquiries appropriate to send to the email address include:

- Questions about allocations and allowable expenditures
- Questions about training or requests to provide training
- Questions about performance measures or documentation/verification requirements
- Process questions (i.e., paperwork for an Injury Protection Program claim)
- Unsure whether a question needs to be submitted through Policy Quest.

Questions about contracts should continue to be directed to the appropriate contract manager. Client-specific policy questions should continue to be submitted through Policy Quest. MAXIS and WF1 questions should be sent to the respective Help Desk. If unclear about where a question should be directed, use the above email address and staff will redirect as appropriate.

#### **Invitation to Comment on this Report**

DHS invites county agency staff and ES providers to comment on this report, and provide ideas of additional information that could be provided in future reports. Send comments and/or ideas to [paul.ramcharit@state.mn.us](mailto:paul.ramcharit@state.mn.us).

## Attachment B: Statewide Corrective Action Process

DHS staff recommends that all county agency staff and ES providers take the following actions to improve documentation performance for TANF Work Participation Rate (WPR) documentation reviews.

Recommended actions:

- Use the MFIP Activity Guide in Appendix E of the MFIP ES Manual. This document is used for the TANF Work Participation Rate documentation reviews and will help workers understand documentation requirements, and determine if documentation is complete.
- Review individual case finding results with financial and ES staff who have the case, and ensure that each result gets filed in the appropriate county financial and Employment Services provider case file.
- Review this entire report, TANF Work Participation Rate documentation review reports for each sample, and the federal fiscal year report, with appropriate staff and management to gain a better understanding of the common causes that contributed to errors. Available at: [http://www.dhs.state.mn.us/County\\_Reports](http://www.dhs.state.mn.us/County_Reports)
- Review time sheets, activity logs, and other documents used to document/verify hours of participation to ensure the forms meet all documentation requirements (refer to MFIP Activity Guide in Appendix E of the MFIP ES Manual, or the ES MFIP Activity Guide Tip Sheet in Appendix B of this report). Revise forms as necessary, or use the DHS recommended eDocs forms available at:
  - DHS-2883-ENG 2-09, MDHS Request for Verification of School Attendance/Progress: <https://edocs.dhs.state.mn.us/lfsrver/Legacy/DHS-2883-ENG>
  - DHS-3336-ENG 8-08, Self Employment Report Form: <https://edocs.dhs.state.mn.us/lfsrver/Legacy/DHS-3336-ENG>
  - DHS-5006F-ENG 1-13, Earned Income/Pay Period/Date Tracking Form–2013: <https://edocs.dhs.state.mn.us/lfsrver/Public/DHS-5006F-ENG>
  - DHS-5784-ENG 10-11, MFIP/DWP Employment Services Weekly Job Search Activity Documentation Log: <https://edocs.dhs.state.mn.us/lfsrver/Public/DHS-5784-ENG>
- Conduct periodic management/supervisor reviews of participant case files, case notes, and the corresponding data entered in the MAXIS and WF1 systems to ensure proper documentation and data entry.

Employment Services providers – Use the “Supervisory Case File Review – TANF Work Participation Verification Documentation Checklist for Unpaid Core and Non-core Activities” form developed for ES providers as a tool to assist county agencies in reviewing Employment Services cases for documentation purposes. It is available on CountyLink, DHS Program Resources, and Employment Services page under the Tip Sheets section at:

[http://www.dhs.state.mn.us/dhs16\\_157830.pdf](http://www.dhs.state.mn.us/dhs16_157830.pdf)

Financial supervisor/worker – use the “Financial Case Review – TANF Work Participation Documentation, Verification and Coding Checklist” form. This tool assists financial workers and supervisors to do TANF Work Participation Rate documentation reviews on their cases. A Checklist Guide was also provided to help direct users to additional information on using the form. To access the form and guide, use the link below to access CountyLink, DHS Program Resources – DWP and MFIP page under DWP/MFIP Online Resources section:

[http://www.dhs.state.mn.us/dhs16\\_146446.pdf](http://www.dhs.state.mn.us/dhs16_146446.pdf)

- Conduct county information sessions based on the MAXIS and Employment Services Activity Errors by Category and Cause, noted earlier in this report.
- Encourage workers to share strategies for working with participants to improve compliance with documentation requirements.
- Continue to use the summary and detailed data reports provided by the Minnesota Department of Employment and Economic Development (DEED), available on its website at:

[http://www.positivelyminnesota.com/All\\_Programs\\_Services/Work\\_Participation-MFIP\\_TANF/index.aspx](http://www.positivelyminnesota.com/All_Programs_Services/Work_Participation-MFIP_TANF/index.aspx)

<https://mfipapps.positivelyminnesota.com/Login.aspx>

## Attachment C: MFIP Activity Guide Tip Sheet

This Tip Sheet is on CountyLink, DHS Program Resources, DWP and MFIP, ES Training/Provider Resources, Tip Sheets page at:  
[http://www.dhs.state.mn.us/dhs16\\_156020.pdf](http://www.dhs.state.mn.us/dhs16_156020.pdf)\*

Activity	Documentation Needed	Notes
(Unpaid) work experience	<ul style="list-style-type: none"> <li>• Participant’s name</li> <li>• Dates covered (no less frequently than monthly)</li> <li>• Number of hours worked <i>each</i> day</li> <li>• Work site supervisor’s signature or other responsible individual, not employment services provider (ESP)</li> <li>• Name and phone number of work site supervisor (or other responsible individuals) must be on file or on activity log.</li> </ul>	Monthly hours must comply with Fair Labor Standards Act (FLSA)**
Community Service Programs (CSP)	<ul style="list-style-type: none"> <li>• Participant’s name</li> <li>• Dates covered (no less frequently than monthly)</li> <li>• Number of hours worked <i>each</i> day</li> <li>• Work site supervisor’s signature or other responsible individual, not ESP</li> <li>• Name and phone number of work site supervisor (or other responsible individuals) must be on file or on activity log</li> <li>• Statement of useful public purpose the placement provides</li> <li>• Statement of how job will enhance employability.</li> </ul>	Monthly hours must comply with FLSA**
Job search Form <a href="#">DHS-5784</a> is mandatory to document job search activity	<p><i>Part 1 (front of form)</i></p> <ul style="list-style-type: none"> <li>• Participant’s name</li> <li>• Dates covered (weekly)</li> <li>• Job contact information (date of contact, time spent on job contact, the position of interest, employer contact info, purpose and result of job contact)—all columns must be completed.</li> </ul> <p><i>Part 2 (back of form)—On-site activity</i></p> <ul style="list-style-type: none"> <li>• Date</li> <li>• Time spent</li> <li>• Type of on-site activity (such as job club, structured job search, etc.)</li> </ul> <p>For agency use only section</p> <ul style="list-style-type: none"> <li>• Total hours (regular hours, on-site hours, holiday hours, other excused absence hours, chemical dependency/mental health and rehab services hours)</li> <li>• Weekly check-in (date and method used)</li> <li>• Bi-weekly verification of job contacts (note which job contacts verified and method used to verify).</li> </ul> <p>Signatures/dates</p> <ul style="list-style-type: none"> <li>• Both participant and ESP.</li> </ul>	

\***Family Stabilization Services** – See **Appendix E of [Employment Services Manual](#)** for the complete Supervision, Documentation, and Verification Requirements, including Family Stabilization Services provisions. \*\* **Fair Labor Standards Act (FLSA)** – All work experience participants are considered employees under the FLSA. Participant would not be required to participate in unpaid work experience more hours than the monthly MFIP cash assistance amount, plus the monthly food support amount divided by the federal minimum wage.

Activity	Documentation Needed	Notes
Providing child care to a CSP participant's child(ren)	<ul style="list-style-type: none"> <li>• Participant's name</li> <li>• Dates covered</li> <li>• Number of hours <i>each</i> day</li> <li>• Signature of the participant who is engaged in the community service program</li> <li>• Name and phone number of the participant engaged in the CSP must also be on the activity log or on file.</li> </ul>	Monthly hours must comply with FLSA.**
Vocational education	<ul style="list-style-type: none"> <li>• Participant's name</li> <li>• Dates covered (no less frequently than monthly)</li> <li>• Number of hours attended <i>each</i> day</li> <li>• Responsible individual's signature (not ESP)</li> <li>• Name and phone number of responsible individual must be on file or on activity log.</li> </ul> <p>***See note below about study time allowed for all school-related activities.</p>	Responsible individual's signature is not needed if faxed or emailed by the school.
Job skills training (includes ABE, GED, ESL, FWL)	<ul style="list-style-type: none"> <li>• Participant's name</li> <li>• Dates covered (no less frequently than monthly)</li> <li>• Number of hours attended <i>each</i> day</li> <li>• Responsible individual's signature (not ESP)</li> <li>• Name and phone number of responsible individual must be on file or on activity log.</li> </ul> <p>***See note below about study time allowed for all school-related activities.</p>	Responsible individual's signature is not needed if faxed or emailed by the school.
High school	<ul style="list-style-type: none"> <li>• Participant's name</li> <li>• Dates covered (no less frequently than monthly)</li> <li>• Number of hours attended <i>each</i> day</li> <li>• Responsible individual's signature (not ESP)</li> <li>• Name and phone number of responsible individual must be on file or on activity log.</li> </ul> <p>***See note below about study time allowed for all school-related activities.</p>	Responsible individual's signature is not needed if faxed or emailed by the school.
Online and distance learning documentation	<ul style="list-style-type: none"> <li>• The course/program log-in/log-out electronic record; or</li> <li>• Conducted in a supervised setting (name, phone number and signature of responsible individual is required).</li> </ul>	

**\*\*\*Study Time Documentation** Voc. Ed., high school (HS), job skills, Adult Basic Education (ABE), General Equivalency Diploma (GED), English as a Second Language (ESL) and Functional Work Literacy (FWL)—with a statement from the school about recommended study time. One hour of unsupervised study time per class hour can be allowed; more than one hour per class hour needs to be supervised and requires a signature from responsible individual acknowledging study was supervised (cannot exceed the amount of study time advised by the school).

## Attachment D: Tips for Work Benefit (WB) Cases

The TANF Work Participation Rate Documentation Review Team developed the following tips to help ensure that WB cases have the correct hours and income reported and documented.

### **Project Using Actual Income and Hours:**

For calculating initial and ongoing WB eligibility, use the most current income/hours on file. (*Do not average.*)

- WB policy states that the most current actual income/hours should be used to calculate eligibility. The actual income and hours should be coded on the prospective side of JOBS panel.
- Do not average or use multipliers to calculate income or hours for WB.
- Only use pay stubs from the most current month – do not combine pay stubs from two months. Example: Participant only sent one pay stub for the most current income to date, June 2014. Gross income was \$253.75 and total hours were 35. The participant is paid bi-weekly. Code the JOBS panel with \$253.75 for both checks to *project income and code 70 hours as the prospective hours.*
- Document clearly which income and hours were used to code the JOBS panel.

### **Updating JOBS Panel and Income Windows with New Income/Hours Information:**

**Supplemental Nutrition Assistance Program (SNAP)** – Use the JOBS SNAP Prosp Inc field to access the SNAP Prospective Income Calculation pop-up window. This window is an online calculator used to correctly calculate average hours and income per pay date, as well as prospective monthly income. DO NOT copy this income/hours data to the JOBS panel.

**Health Care (HC)** – Use the JOBS HC Inc Est field to access the HC Income Estimate window. Update this window with the average income per pay period anticipated from the income source listed on JOBS; the estimated monthly income is used in HC budgets for months at a time. DO NOT update the “Hrs” field on the JOBS panel and DO NOT copy the window income data to the JOBS panel.

**Work Benefit** – Use the JOBS panel when new income/hours information is received for WB. MAKE SURE to update the *prospective* data on the JOBS panel to reflect the most current income and hours data. (*Do not average.*)

- Some cases receive new information for HC and/or SNAP after the WB approval is done. If new information becomes available, WB eligibility should be re-assessed, and the most current hours should be updated on the JOBS panel using the WB method of calculating income and hours (do not average.) For HC/SNAP, each income window should be updated using the respective program policy calculation method for income and/or hours.
- Workers – Document clearly which income and hours were used to calculate ongoing WB eligibility.

### **Document, Document, Document!**

- For many cases, there is no information in case notes documenting how the WB income/hours were calculated.

### **Do Not Code Hours to Meet Work Participation Rate:**

- Some cases have 90 or 160 hours coded, which does not reflect the documented hours in the case file.