Minnesota Work Participation Rate Documentation Review Report

Temporary Assistance for Needy Families (TANF)


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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.
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Executive Summary

Temporary Assistance to Needy Families (TANF) regulations included in the 2005 Deficit Reduction Act (DRA) legislation requires states to develop a work verification plan, and monitor participants’ engagement in work activities in order to verify hours of participation.

To meet the verification requirement, Minnesota conducts a quarterly documentation review 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 work participation rate 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 (Work Benefit (WB), Maxis-only, Employment Services-only (ES) and MAXIS/ES cases), and 18 cases with zero countable hours in one or more months in the sampled quarter. This is the first report for FFY 2013, covering the Oct. to Dec. 2012 quarter.

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

- Twenty-six of Minnesota’s 87 counties (30 percent) were represented in this quarter’s sample of 68 cases. Thirty cases sampled were reported as meeting the required hours of participation in federal WPR reporting (included in the numerator value of the WPR). The remaining 38 cases were reported as not meeting the required hours of participation.

- The documentation review found that of the 68 cases sampled, 35 cases (51 percent) were correct for documentation of hours and had no error findings.

- Among the remaining 33 cases (49 percent) that had at least one documentation error, 14 cases had errors that led to a direct impact on the work participation rate. Details are noted below:

  - Nineteen cases (28 percent) had errors that did not have an impact on the federal work participation rate, but had discrepancies in the number of hours submitted in federal reporting.

  - Nine cases (13 percent) should not have been reported as meeting the required hours of participation (did not have enough documented hours).

  - Three cases (5 percent) reported as not meeting WPR, should have been reported as meeting the required hours of participation (had enough documented hours).

  - Two cases (3 percent) should have been excluded from WPR reporting because of FSS eligibility, and for a child <1 exemption.

- Of the 18 zero hour cases, there were 15 that had no documentation errors but remained zero hour cases after review, ranging from one month to 25 months. Two cases have been zero hour cases for more than a year. Three cases were reported as zero hour cases in error.
The Minnesota Department of Human Services (DHS) 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 information to 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 Minnesota Department of Human Services also administers the Diversionary Work Program (DWP), a short-term, work-focused program for families applying for cash benefits. It provides a maximum of four consecutive months in a 12-month period, of necessary services and supports to families which will lead to unsubsidized employment, increased economic stability, and reduced risk of needing longer-term assistance under MFIP.

The WPR was established under the federal Personal Responsibility and Work Opportunity 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 in order to verify hours of participation.\(^1\)

Minnesota’s Verification Process

The Minnesota Department of Human Services (DHS), Transition Support Quality Services (TSQS) Division is responsible for monitoring and reviewing statewide random samples of TANF cases 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”\(^2\) (MFIP ES Manual) includes the MFIP Activity Daily Supervision, Documentation and Verification Guide in Appendix E. The guide shows documentation requirements for both the MAXIS and Employment Services (ES) activities. The review process uses this primary resource as guidance in determining if case file documentation and verification meets 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 Oct.-Dec. quarter, DHS staff reviewed a statewide stratified random sample of 68 TANF and Work Benefit (WB) cases that were 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 of which are WB cases), and 18 cases with zero countable hours in one or more months in the review quarter.

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\(^1\) The specific regulation pertaining to the documentation auditing process is 45 CFR 261.62 (b)(5).

\(^2\) Available at: [http://www.dhs.state.mn.us/main/id_016957](http://www.dhs.state.mn.us/main/id_016957).
For this reporting period, DHS selected a random statewide sample of 68 cases for the review period of October, November and December 2012. Twenty-six counties were represented in the sample. Number of sampled cases by county is shown in Table 1.

Table 1: Number and Percent of Sampled Cases by County

<table>
<thead>
<tr>
<th>County</th>
<th>Cases</th>
<th>Percent</th>
<th>County</th>
<th>Cases</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Anoka</td>
<td>5</td>
<td>7.4%</td>
<td>Kandiyohi</td>
<td>1</td>
<td>1.5%</td>
</tr>
<tr>
<td>Becker</td>
<td>1</td>
<td>1.5%</td>
<td>Koochiching</td>
<td>1</td>
<td>1.5%</td>
</tr>
<tr>
<td>Beltrami</td>
<td>2</td>
<td>2.9%</td>
<td>Mower</td>
<td>1</td>
<td>1.5%</td>
</tr>
<tr>
<td>Blue Earth</td>
<td>2</td>
<td>2.9%</td>
<td>Nicollet</td>
<td>2</td>
<td>2.9%</td>
</tr>
<tr>
<td>Cass</td>
<td>2</td>
<td>2.9%</td>
<td>Olmsted</td>
<td>1</td>
<td>1.5%</td>
</tr>
<tr>
<td>Clay</td>
<td>1</td>
<td>1.5%</td>
<td>Ramsey</td>
<td>11</td>
<td>16.2%</td>
</tr>
<tr>
<td>Cottonwood</td>
<td>1</td>
<td>1.5%</td>
<td>Redwood</td>
<td>1</td>
<td>1.5%</td>
</tr>
<tr>
<td>Dakota</td>
<td>1</td>
<td>1.5%</td>
<td>St. Louis</td>
<td>5</td>
<td>7.4%</td>
</tr>
<tr>
<td>Douglas</td>
<td>1</td>
<td>1.5%</td>
<td>Scott</td>
<td>2</td>
<td>2.9%</td>
</tr>
<tr>
<td>Fillmore</td>
<td>1</td>
<td>1.5%</td>
<td>Stearns</td>
<td>4</td>
<td>5.9%</td>
</tr>
<tr>
<td>Goodhue</td>
<td>1</td>
<td>1.5%</td>
<td>Waseca</td>
<td>1</td>
<td>1.5%</td>
</tr>
<tr>
<td>Hennepin</td>
<td>17</td>
<td>25.0%</td>
<td>Washington</td>
<td>1</td>
<td>1.5%</td>
</tr>
<tr>
<td>Isanti</td>
<td>1</td>
<td>1.5%</td>
<td>Winona</td>
<td>1</td>
<td>1.5%</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td></td>
<td>26 counties</td>
<td>68</td>
</tr>
</tbody>
</table>
**Review Process**

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

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

After case reviews are completed, a detailed report is generated for each reviewed case and sent to the respective county for review. The review packet sent to the county consists of a:

- Cover letter and findings information sheet that provides 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 the individual review results
- Detailed individual case findings report for each case reviewed (MAXIS information and Employment Services information) that should be placed in each case file, respectively.

Counties are encouraged to examine the department’s assessment and final determination of cases and share the results with financial workers and the respective employment services provider. County agencies are encouraged to provide feedback within a specified time frame. All feedback is reviewed and the final determination of each case is validated before the data is aggregated and analyzed.

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\(^3\) 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. The MAXIS system 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 (WB), which began Oct. 1, 2009.

\(^4\) 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 non-profit 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.
Section II: Review Findings

Findings Summary
This section discusses the cohort of cases sampled, and errors associated with an incorrect case. At the findings level, a case is counted as incorrect only once, even if there are more than one MAXIS and/or ES errors. As such, 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, 35 (51 percent) had a correct finding and met the documentation requirements; 33 (49 percent) were incorrect with at least one error finding.

Among the 33 cases (49 percent) that had at least one documentation error, 14 cases had errors that would have changed their status of meeting or not meeting the required hours of participation, or should have been excluded from WPR. Details are noted below and summarized in Table 2:

- Nineteen cases (28 percent) had errors that did not have an impact on the federal work participation rate, but had discrepancies in the number of hours submitted in federal reporting.
- Nine cases (13 percent) should not have been reported as meeting the required hours of participation (did not have enough documented hours).
- Three cases (5 percent) reported as not meeting WPR should have been reported as meeting the required hours of participation (had enough documented hours).
- Two cases (3 percent) should have been excluded from WPR reporting because of eligibility for FSS and for a child <1 exemption.

Table 2: Findings Summary

<table>
<thead>
<tr>
<th>Findings</th>
<th>Cases</th>
<th>Impact on WPR Reporting</th>
<th>Cases</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Correct Findings</td>
<td>35 (51%)</td>
<td>No change</td>
<td></td>
<td>-</td>
</tr>
<tr>
<td>Incorrect Findings</td>
<td>33 (49%)</td>
<td>Impacted data in federal reporting but did not impact WPR</td>
<td>19</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Reported as meeting required hours of participation, but did not</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Reported as not meeting required hours of participation, but did</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Should have been excluded from WPR reporting</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>68</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Among the cases in the stratified sample, 15 of the 18 zero hour cases were correct; four of the eight WB cases were correct, and 16 of the other 42 cases were correct. The review results are summarized and illustrated in Figure 1, with additional details in the footnotes.

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

<table>
<thead>
<tr>
<th>Types of Cases Sampled</th>
<th>Cases Sampled</th>
<th>Review Findings</th>
<th>Errors in Incorrect Cases</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Correct Cases</td>
<td>Incorrect Cases</td>
</tr>
<tr>
<td>a. Zero Hours</td>
<td>18</td>
<td>15</td>
<td>3</td>
</tr>
<tr>
<td>b. WB (MAXIS only)</td>
<td>8</td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td>c. All other cases</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>ES only</td>
<td>9</td>
<td>2</td>
<td>7</td>
</tr>
<tr>
<td>MAXIS only b</td>
<td>19</td>
<td>9</td>
<td>10</td>
</tr>
<tr>
<td>MAXIS/ES c</td>
<td>14</td>
<td>5</td>
<td>9</td>
</tr>
<tr>
<td>Total</td>
<td>68</td>
<td>35</td>
<td>33</td>
</tr>
</tbody>
</table>

As noted above, an incorrect case can have either MAXIS errors or ES errors, or both MAXIS and ES errors. The 33 incorrect cases had a total of 34 errors; 21 errors were MAXIS and 13 were ES. These errors are discussed later in this report.

b One of the 10 incorrect MAXIS-only cases had both ES and MAXIS errors.

c One of the nine incorrect MAXIS/ES cases had two MAXIS errors.
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, even though they have no countable WPR hours for the review month. Cases considered zero countable WPR hours have no countable hours reported for the review month, but can have non-countable hours such as job search hours that are reported as “other” work activities (for cases where the total hours are less than the 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 of these cases. These problems included financial worker failure to do an ES referral, resulting in no open employment services case or opened much later than MFIP, cases with several zero hour months because of lack of timely assessment for Family Stabilization Services (FSS), failure to sanction timely, as well as other case management issues.

As shown in Table 3, 15 of the 18 zero hour cases had no documentation errors; two had errors that would have excluded them from the work participation rate, and one had hours found in the case file but not reported in MAXIS.

Table 3: Zero Hour Case Findings and Error Details

<table>
<thead>
<tr>
<th>Case Findings</th>
</tr>
</thead>
<tbody>
<tr>
<td>15 (83 percent) cases had correct findings</td>
</tr>
<tr>
<td>Three (17 percent) cases had incorrect findings, with three MAXIS errors.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Error Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Case one—case should have been coded in MAXIS for child &lt;1 exemption. Had it been correctly coded, it would have been excluded from WPR reporting.</td>
</tr>
</tbody>
</table>

<p>| |</p>
<table>
<thead>
<tr>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Case two—case should have been coded for FSS eligibility. Had it been correctly coded, it would have been excluded from WPR reporting.</td>
</tr>
</tbody>
</table>

<p>| |</p>
<table>
<thead>
<tr>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Case three—there were no counted hours reported for WPR, but the review found 37 countable hours on file that were not reported on MAXIS.</td>
</tr>
</tbody>
</table>

Scope of Review of Zero Hour Cases
The main scope of documentation reviews was 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 4, 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.
Case Management for Correct Zero Hour Cases
Even though 15 zero hour cases had no documentation errors, the review found that most cases were handled correctly and a third incorrectly by MAXIS and ES workers (although this did not constitute a documentation error). As shown in Table 4, two-thirds of the 15 zero hour cases with no documentation errors were handled correctly, but a third was handled incorrectly during the review month.

Table 4: How Correct Zero Hour Cases were handled during the Review Month

<table>
<thead>
<tr>
<th>Handled Correctly</th>
<th>Review Month Description of Case Management</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 (67 percent)</td>
<td>• Case in process of being, or is currently sanctioned, for the review month (5)</td>
</tr>
<tr>
<td></td>
<td>• First month on assistance and no work activity assigned—review month (3)</td>
</tr>
<tr>
<td></td>
<td>• Job search hours reported as “other” for WPR (1)</td>
</tr>
<tr>
<td></td>
<td>• Child Under Age 1 Exemption in effect for review month (1)</td>
</tr>
<tr>
<td>Handled Incorrectly</td>
<td></td>
</tr>
<tr>
<td>5 (33 percent)</td>
<td>• Failure to refer participant to an ES provider (1)</td>
</tr>
<tr>
<td></td>
<td>• Activity open, but no counted hours tracked (3)</td>
</tr>
<tr>
<td></td>
<td>• Failure to act on a referral from the county agency (1)</td>
</tr>
</tbody>
</table>

Length of Time as a Zero Hour Case
The documentation review identified zero hour cases that remained in a zero hour status for several months. For the zero hour cases with no documentation errors (n=15), the cases remained zero hour cases ranging from one to 25 months. Two have been zero hour cases for more than a year. A distribution is presented in Table 5. 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 5, 53 percent of the 15 cases with no documentation errors had no engagement. No engagement means no countable or non-countable hours coded.

Table 5: Months as a Zero Hour Case

<table>
<thead>
<tr>
<th>Months with Zero Hours</th>
<th>Cases</th>
<th>Type of Engagement</th>
<th>Cases</th>
<th>Avg. Months with Non-countable Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>1-5 months</td>
<td>6 (40%)</td>
<td>No engagement</td>
<td>5</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Some engagement</td>
<td>1</td>
<td>2.0</td>
</tr>
<tr>
<td>6-12 months</td>
<td>7 (47%)</td>
<td>No engagement</td>
<td>2</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Some engagement</td>
<td>5</td>
<td>5.2</td>
</tr>
<tr>
<td>13-35 months</td>
<td>2 (13%)</td>
<td>No engagement</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Some engagement</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Total</td>
<td>15</td>
<td>No engagement</td>
<td>8 (53%)</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Some engagement</td>
<td>7 (47%)</td>
<td>4.3</td>
</tr>
</tbody>
</table>

*The eight cases with no engagement were zero hour cases ranging from 1 month to 25 months, averaging 6.1 months, or 3.4 months if the one case for 25 months was excluded.
**Work Benefit Cases (n=8)**

The Work Benefit program (WB) is a monthly cash benefit for families who have exited DWP 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, please see Attachment D: Tips for Work Benefit (WB) Cases. WB cases are all MAXIS cases, in the numerator of the WPR reporting. Of the eight WB cases in the sample, four had no documentation errors and four had MAXIS documentation errors. One of the four errors impacted the WPR while the other three involved training issues. The review result and error details for WB cases are summarized in Table 6:

<table>
<thead>
<tr>
<th>Case Findings</th>
</tr>
</thead>
<tbody>
<tr>
<td>4 (50 percent) had correct findings</td>
</tr>
<tr>
<td>4 (50 percent) had incorrect findings with four MAXIS errors.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Error Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Case one—150 hours were reported, but 58 hours were verified. MAXIS showed prospective income/hours even though participant’s temporary earned income employment ended. Participant found new employment, but the hours did not meet the WPR requirement of 87 hours to continue WB. Had the hours been correctly entered, this case would not have been reported as meeting the required hours of participation for WPR and would not have been eligible for the Work Benefit program.</td>
</tr>
</tbody>
</table>

| Case two—152 hours were reported, but 144 were verified. Two pay stubs were received on the same date, but the most current one was not used to calculate WB eligibility. WB policy states that the most current actual income/hours should be used to calculate eligibility. |

| Case three—242 hours were reported, but 174 were verified. The participant is self-employed and takes a monthly draw. The financial worker coded a MAXIS/JOBS panel using this draw each month. The other business income and expenses were coded on BUSI. Per Supplemental Nutrient Assistance Program (SNAP) policy this is correct. However, for WB, the draw income should not be entered on JOBS. Only a BUSI panel should be completed. The recommended way to process this case to meet policy requirements for both SNAP and WB would be to use the pop-up window on the JOBS panel to calculate income for SNAP. On the JOBS panel, zero out the income and the hours. This would give the needed results for both SNAP and WB. Enter the amounts needed on the BUSI panel for WB and SNAP. Case notes did not specify how the WB income/hours were calculated. |

| Case four—120 hours were reported, but 108 were verified. The county agency received submitted earned income documents but the financial worker did not update the budget with the new income/hours. Although it is not necessary for participants to submit earned income information on a monthly basis for WB, the budget should be updated whenever participant submits new information on their earned income. The participant also submitted a paystub from a second employer. This should have been used to project future income. |

Table 6: Work Benefit Case Findings and Error Details
All other Cases (n=42)

MAXIS-only Cases (n=19)
MAXIS-only cases are those with paid employment and had at least one countable hour for the WPR. In the sample of 68 cases, there were 19 MAXIS-only cases (28 percent). Nine of the 19 cases were correct and 10 cases were incorrect. Among the 10 cases with documentation errors:

- Seven had 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.
- Two should have been reported as meeting the required hours of participation (had the required number of participation hours)
- One should not have been reported as meeting the required hours of participation (did not have the required number of verifiable participation hours).

The review results and error details for MAXIS-only cases are summarized in Table 7.

Table 7: MAXIS-Only Case Findings and Error Details

<table>
<thead>
<tr>
<th>Case Findings</th>
<th>Error Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>9 (47 percent) had correct findings</td>
<td>Case one— Hours recorded were inconsistent with documentation in case file. Hours recorded on MAXIS showed 140, but documentation in the case file showed a total of 113 hours. This case should not have been reported as meeting the required hours of participation in the WPR.</td>
</tr>
<tr>
<td>10 (53 percent) had incorrect findings, with 10 MAXIS and one ES errors.</td>
<td>Case two—68 hours were reported, but 99 hours were verified. The review found earned income documentation in the case file but the hours were not recorded in MAXIS. Had these hours been recorded, this case would have met the required hours of participation in the WPR.</td>
</tr>
<tr>
<td></td>
<td>Case three—84 hours were reported, but 90 hours were verified. The hours recorded were inconsistent with documentation in the case file. According to the wage documentation found in the case file, there were four pay dates in the review month with hours totaling 89.54, or 90 after rounding. Had the hours been correctly recorded, this case would have met the required hours of participation for WPR.</td>
</tr>
<tr>
<td></td>
<td>Case four—148 hours reported, but 222 were verified. Hours recorded were inconsistent with documentation in the case file. Financial worker did not include hours from a third paycheck in the review month.</td>
</tr>
<tr>
<td></td>
<td>Case five—131 hours were reported, but 130 were verified. Participant reported self-employment income and no expenses. This calculates to a total of 130 hours once the rolling average is applied. The financial worker calculated the participant's income to be a different</td>
</tr>
</tbody>
</table>
amount and thus ended up with total hours of 131 for the month.

Case six (one MAXIS and one ES error)—a total of 102 MAXIS/ES hours were reported, but 93 were verified. There were two errors in this case; one MAXIS and one ES. For the review month, there were 94 hours reported in MAXIS. Documentation on file showed that the total number of hours worked was 93 (MAXIS error). In addition, eight holiday hours were coded for unpaid work by employment services. There were no unpaid work hours entered, therefore, holiday hours cannot be counted (ES error).

Case seven—34 hours were reported, but 42 were verified. The hours recorded in MAXIS were inconsistent with hours in the case file. There were 34 work hours reported for WPR for paid employment. The review verified 42 hours based on documentation in the case file.

Case eight—39 hours were reported, but 38 were verified. The review found that there were 36 documented hours from employment. There was additional self employment income reported on a self employment form. The self employment hours were calculated to be two hours resulting in 38 hours.

Case nine—Eight hours were reported, but no hours were verified. The review found an error as the self-employment income was incorrectly budgeted. The participant was self employed. At application, the county agency averaged the self-employment income declared by the participant on the income ledger for four months. The averaged amount was used for gross income on the BUSI screen. This amount remained the same until it was changed to a higher amount seven months later during the review month in the BUSI panel. It was not clear during the review how this was calculated. When dealing with a self-employed participant on MFIP, the financial worker should be using a rolling average (MFIP Self-employment Income Worksheet, DHS-3337-ENG). For ongoing verification of monthly income and expenses, DHS recommends the use of the Self-employment Report Form, (DHS-3336-ENG).

Case ten—32 hours were reported, but no hours were verified. The review found wage documentation in the case file that did not indicate the number of work hours. The Earnings History Report from the employer listed the check date and gross wage but no pay rate or hours worked. It is not clear during the review how the financial worker arrived at the 32 hours entered on the JOBS panel, there was no explanation in the case notes.
ES-only Cases (n=9)
There were nine ES-only cases in the sample. Seven of the nine cases had documentation errors; two cases had correct findings. Among the seven cases with documentation errors:
- Four should not have been reported as meeting the required hours of participation (did not have the required number of verifiable participation hours)
- Three had errors, but the errors did not have a 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 8.

Table 8: ES-only Case Findings and Error Details

<table>
<thead>
<tr>
<th>Case Findings</th>
</tr>
</thead>
<tbody>
<tr>
<td>2 (22 percent) had correct findings</td>
</tr>
<tr>
<td>7 (78 percent) had incorrect findings, with seven ES errors.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Error Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Case one— 130 hours were reported, but 128 were verified. There were 85 hours reported for unpaid work experience and 45 hours for job search. Hours recorded were inconsistent with documentation in the case file. Of the 45 hours of job search activity reported for the review month, the review verified 43 hours. The difference in the hours was the result of coding activity hours that were not consistent with job search documentation submitted by the participant. Hours on the activity log totaled 43. Had the hours been correctly recorded, this case would not have been reported as meeting the required hours of participation in the WPR.</td>
</tr>
<tr>
<td>Case two—140 hours were reported, but no hours were verified. For the review month, there were 140 hours of training coded on WF1 and reported for WPR. The review found a class schedule on file listing the class times and credits. However, the review was not able to allow the class time as there was no attendance log with a signature from a responsible individual from the school. There was also no study statement from the school about the recommended amount of study time for the participant's classes/program. To allow for study time, per federal law, a statement from a school must be on file. The participant was using a job search log to turn in her training hours. The job search log should not be used for anything other than job search. The job search log does not meet federal TANF requirements, as there is no place for a school or individual to sign the log, nor is there a spot for that person's phone number or name. Given the documentation errors of this case, it should not have been reported as meeting the required hours of participation in the WPR.</td>
</tr>
</tbody>
</table>
| Case three—160 hours were reported, but 128 were verified. The participant turned in completed attendance logs for each of her five classes. There was also a statement on file from the school stating the recommended study time for each class hour. Class time per week was 16 hours so the review could allow 64 hours of class time per month. Per federal TANF policy, one hour of unsupervised study time for each class hour can be allowed. Thus, 64 hours of unsupervised study time for the month were allowed. The class time (64 hours) plus study time (64 hours) totaled 128 hours. Note: Per federal TANF policy for study time documentation: With a statement on file from the school about recommended study time,
one hour of unsupervised study time per class hour can be allowed. More than one hour of study time per class hour needs to be supervised and requires a signature from a responsible individual acknowledging study was supervised (and cannot exceed the amount of study time advised by the school). For this participant, there was no statement from the instructors indicating that study time was supervised, so only one hour (unsupervised) of study time can be allowed per class hour. It is permissible to have one person at the school sign off for all attendance hours, if they are willing to do this. Had the hours been correctly recorded, this case should not have been reported as meeting the required hours of participation in the WPR.

Case four—139 hours were reported, but 58 were verified. The hours recorded were inconsistent with documentation in the case file. The documentation was missing responsible individual's signature for supervised study time exceeding the one hour per class time hour. The participant was registered for four classes. The first error was the result of allowing more study time than supported by the documentation submitted by the participant. Because there was no documentation that any of the study time was supervised, the only study time allowed was up to one hour of unsupervised study time per class hour. The second error was allowing seven class-time hours in week three when the participant did not have classes for two days that week. Given the documented number of hours, this case should not have been reported as meeting the required hours of participation in the WPR.

Case five—184 hours were reported, but 120 were verified. The hours recorded were inconsistent with documentation in the case file. The review was able to verify 120 hours from the documentation found on file. There was no documentation on file to verify the extra hours coded in WF1.

Case six—40 hours were reported, but 48 were verified. There were 40 hours of unpaid work experience activity reported. There were no hours for English as a second language (ESL) activity reported, but the review verified eight hours. There was an MFIP Monthly School Verification form for the review month found in the ES case file; it listed 7.75 hours of attendance. Although the ESL activity was closed out the month before, these hours should have been coded in WF1 or explained in case notes. Even with these hours, there would not have been enough hours to meet the required hours of participation.

Case seven—27 hours were reported, but no hours were verified. The participant turned in a log for 27 hours for job skills directly related to employment but there was no signature of a responsible individual at the training site.
MAXIS/ES Cases (n=14)
There were 14 MAXIS/ES cases in the sample. Nine cases had documentation errors; five had no errors. Among the nine cases with documentation errors:

- Five of the error cases did not have a direct impact on the work participation rate, but resulted in a discrepancy of hours submitted in federal reporting.
- Three of the nine cases with documentation errors should not have been reported as meeting the required hours of participation (did not have the required number of verified participation hours).
- One case should have been reported as meeting the required hours (had the required number of verified participation hours).

The review results and error details for MAXIS/ES cases are summarized in Table 9.

Table 9: MAXIS/ES Case Findings and Error Details

<table>
<thead>
<tr>
<th>Case Findings</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>5 (36 percent) had correct findings</td>
<td></td>
</tr>
<tr>
<td>9 (64 percent) had incorrect findings, with four MAXIS and five ES errors.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Error Details</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Case one (MAXIS error)—87 hours were reported (84 MAXIS; 3 ES), but 86 were verified.</td>
<td></td>
</tr>
<tr>
<td>There were 84 paid hours and three ES hours of job search reported. The review found three checks for the review month totaling 82.75 (rounded to 83), not 84 as reported in MAXIS.</td>
<td></td>
</tr>
<tr>
<td>Had the computation been accurate, this case would not have been reported as meeting the required hours of participation in the WPR.</td>
<td></td>
</tr>
</tbody>
</table>

| Case two (ES error)—87 hours were reported (69 MAXIS; 18 ES), but 81 hours were verified. |          |
| The 69 MAXIS hours were verified, but the review could not substantiate the 18 ES job search hours because of lack of documentation. Although the participant and job counselor signed the form, the "For Agency Use Only" section was left blank so there was no information regarding verification of a bi-weekly job contact. The review also found documentation for 12 hours of English as a second language activity that occurred in the review month. These hours were not entered in WF1 and there was no explanation why the job counselor did not count these hours. The 69 paid employment hours plus the 12 ESL activity hours, totaled 81. Had the hours been documented correctly, this case would not have been reported as meeting the required hours of participation in the WPR. |          |

| Case three (ES error)—131 hours were reported (104 MAXIS; 27 ES), but 104 were verified. |          |
| The 104 paid employment hours were verified but the 27 ES hours for unpaid work experience were inconsistent with documentation in the case file. The 27 hours of unpaid work experience were coded in WF1 but there was no documentation on file or in case notes that indicated that there were unpaid hours. Had the hours been recorded according to the documentation in the case file, this case would not have been reported as meeting required hours of participation in the WPR. |          |

| Case four (ES errors)—55 hours were reported (37 MAXIS; 18 ES), but 118 were verified. |          |
| The 37 paid employment hours were verified. The 18 ES hours were for GED activity but the |          |
review verified 16. There were several errors identified in the review: ES failure to notify the financial worker that the participant's paid employment was subsidized and the type of subsidy; the GED hours recorded were inconsistent with documentation in the case file as well as having a rounding error; and, there were 65 job search hours documented in the case file but not fully reported in recorded in WF1. Had these hours been coded correctly, this case would have been reported as meeting the required hours of participation in the WPR.

Case five (ES error)—152 hours were reported (149 MAXIS; 3 ES), but 149 were verified. The 149 MAXIS hours for paid employment were verified but there were no documentation or explanation to verify or support the three hours of job skills activity reported.

Case six (MAXIS error)—six hours were reported (all MAXIS), but two hours were verified. Self employment was incorrectly applied. There were six hours of self-employment activity reported for the review month, but the review verified two hours. The financial worker should have used a rolling average in budgeting of child care income, as well as allowing for expenses. The difference in the hours reported for the WPR and those verified by the review was no expenses were allowed by the financial worker when the income was budgeted. The participant should have been given the choice of either actual verified expenses or the 60 percent flat rate, whichever seemed most advantageous. In addition, although the review accepted the hours reported as self employment, there as a question of accuracy. The financial worker did not provide information in the case file that identified the income as self employment, as opposed to regular income. (Refer to the Combined Manual 0017.15.33.21 for more information on self-employment income from in-home daycare.)

Case seven (ES error)—101 hours were reported (91 MAXIS; 10 ES), but 98 were verified. The 91 MAXIS hours for paid employment were verified. For the review month, the participant was both working in paid employment and participating in ESL classes. The participant verified two hours of ESL but the job counselor allowed eight hours of holiday. According to ES policy (MFIP Employment Services Manual 9.48), the holiday hours must reflect the hours the participant is supposed to attend per the employment plan. This participant was to attend ESL five hours per day, thus, only five hours of holiday can be given.

Case eight (MAXIS error)—72 hours were reported (all MAXIS), but 68 were verified. The difference in hours is the result of two separate errors. In the first error, the worker failed to include the hours (3.68) in one of the pay dates during the review month. In the second error, the worker counted “premium pay” hours on two pay dates (4.25 and 4.12 hours) as additional hours worked when they were already included in the regular total hours. The net impact of these errors resulted in a decrease of four hours.

Case nine (MAXIS error)—78 hours were reported (all MAXIS), but no hours were verified. The review cited an error for 78 prospective hours as the participant called to report that she was no longer working. The worker should have removed the prospective income and hours from the JOBS panel, or entered an N for the verification code on the JOBS panel and requested a stop work verification from the participant. Because the case closed, and the participant did not provide further verification, the hours were incorrectly reported for WPR.
C. Impact of Errors on the Work Participation Rate

This part of the review findings section examined the sampled cases to identify if errors had an impact on a case reported as meeting the required hours of participation and cases that did not meet the required hours of participation. It provides a final determination of the case WPR status based upon the review findings. All 68 cases were included in the federal work participation rate denominator because each case included a work eligible individual (WEI). Cases successfully meeting the required hours of participation were included in the numerator value of the WPR.

Of the 68 cases sampled, 30 were reported as meeting the required hours of participation. Of the 30 cases, 13 had no documentation errors, eight had documentation errors but still met the required hours of participation (remained in the numerator), and nine (30 percent, or nearly one in three) had documentation errors and did not meet the required hours of participation (should not have been in the numerator).

Among the 38 cases reported as not meeting the required hours of participation, 22 had no documentation errors, 13 had documentation errors but still did not meet the required hours of participation, and three had documentation errors and had enough verifiable hours to meet the required hours of participation (should have been reported in the numerator value). A summary of sampled cases on the work participation rate is shown in Table 10.

Table 10: Review Determination of Sampled Cases in the Work Participation Rate (n=68)

<table>
<thead>
<tr>
<th>Cases reported as meeting the required hours of participation (n=30)</th>
<th>Cases</th>
</tr>
</thead>
<tbody>
<tr>
<td>No documentation errors</td>
<td>13</td>
</tr>
<tr>
<td>Documentation errors (but still met required hours of participation)</td>
<td>8</td>
</tr>
<tr>
<td>Documentation errors (did not have the required number of verifiable participation hours)</td>
<td>9</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Cases reported as not meeting the required hours of participation (n=38)</th>
<th>Cases</th>
</tr>
</thead>
<tbody>
<tr>
<td>No documentation errors</td>
<td>22</td>
</tr>
<tr>
<td>Documentation errors (but still did not meet the required hours of participation)</td>
<td>13</td>
</tr>
<tr>
<td>Documentation errors (met the required number of participation hours)</td>
<td>3</td>
</tr>
<tr>
<td>Total</td>
<td>68</td>
</tr>
</tbody>
</table>

In addition, there were two zero hour cases where the workers did not code for FSS eligibility or child <1 exemption. Had these two cases been correctly coded, they would have been excluded from WPR reporting. The documentation review found 14 cases with errors that led to a direct impact on the work participation rate.
Section III: Conclusion

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

Nearly 51 percent of the 68 cases reviewed had no documentation errors. Twenty-eight percent had documentation errors, but the errors did not have a direct impact on the state’s work participation rate, i.e., a change in the numerator or denominator values. Twenty-one percent had errors that would have changed their status of meeting or not meeting the required hours of participation, or should have been excluded from WPR reporting.

Of the 30 numerator cases in the sample, nine (30 percent) should not have been reported as meeting the required hours of participation in the WPR. Among the 38 cases reported as not meeting the required hours of participation, the review found three (7 percent) that had enough hours to meet the required hours of participation.

ES-only cases had the highest rate of errors (78 percent) followed by MAXIS/ES (64 percent). A common error was the discrepancy between what is recorded in MAXIS or WF1 systems and what was in the case file. Addressing this discrepancy alone can significantly reduce documentation errors.

DHS 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 (WB) projected income determination.** Single parent WB cases are included in the TANF Work Participation Rate, therefore, also on 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 the calculation. 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 the 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/lfservlet/Legacy/DHS-2883-ENG](https://edocs.dhs.state.mn.us/lfservlet/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 the correct policy and apply it to a case.
MAXIS examples:
  o  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.
  o  Self employment – review the Self-employment Handbook (link below) and the policy manuals.
    http://www.dhs.state.mn.us/dhs16_144585.pdf

ES examples:
  o  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#

**Other Recommendations**

**Corrective Action**
DHS staff recommend that all county agencies 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 DRA updates.

• County agencies and ES providers with incorrect review findings are encouraged to work with the DHS Transition to Economic Stability (TES) 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 TES: dhs.dwp-mfip@state.mn.us.

Examples of inquiries appropriate to send to the new email address include:
  o  Questions about allocations and allowable expenditures
  o  Questions about training or requests to provide training
  o  Questions about performance measures or documentation/verification requirements
  o  Process questions (i.e., paperwork for an Injury Protection Program claim)
  o  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 new 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 what additional information they would like to see in future reports. Send comments and/or ideas by email to 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/lfsolver/Legacy/DHS-2883-ENG](https://edocs.dhs.state.mn.us/lfsolver/Legacy/DHS-2883-ENG)
  - DHS-3336-ENG 8-08, Self Employment Report Form [https://edocs.dhs.state.mn.us/lfsolver/Legacy/DHS-3336-ENG](https://edocs.dhs.state.mn.us/lfsolver/Legacy/DHS-3336-ENG)
  - DHS-5006F-ENG 1-13, Earned Income/Pay Period/Date Tracking Form – 2013 [https://edocs.dhs.state.mn.us/lfsolver/Public/DHS-5006F-ENG](https://edocs.dhs.state.mn.us/lfsolver/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/lfsolver/Public/DHS-5784-ENG](https://edocs.dhs.state.mn.us/lfsolver/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 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

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. For a copy of 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

- 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 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

https://mfipapps.positivelyminnesota.com/Login.aspx
Attachment C: MFIP Activity Guide Tip Sheet
This Tip Sheet is on CountyLink, Program and Resources, Employment Services, Tip Sheets page at:

http://www.dhs.state.mn.us/dhs16_156020.pdf

<table>
<thead>
<tr>
<th>Activity</th>
<th>Documentation Needed</th>
<th>Notes</th>
</tr>
</thead>
</table>
| (Unpaid) work experience | - Participant’s name  
- Dates covered (no less frequently than monthly)  
- Number of hours worked each day  
- Work site supervisor’s signature or other responsible individual, not employment services provider (ESP)  
- Name and phone number of work site supervisor (or other responsible individuals) must be on file or on activity log. | Monthly hours must comply with Fair Labor Standards Act (FLSA)** |
| Community Service Programs (CSP) | - Participant’s name  
- Dates covered (no less frequently than monthly)  
- Number of hours worked each day  
- Work site supervisor’s signature or other responsible individual, not ESP  
- Name and phone number of work site supervisor (or other responsible individuals) must be on file or on activity log  
- Statement of useful public purpose the placement provides  
- Statement of how job will enhance employability. | Monthly hours must comply with FLSA** |
| Job search | Part 1 (Front side of form)  
- Participant’s name  
- Dates covered (weekly)  
- 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. | |
| | Part 2 (Back side of form)—On-site activity  
- Date  
- Time spent  
- Type of on-site activity (such as job club, structured job search, etc.) | For agency use only section  
- Total hours (regular hours, on-site hours, holiday hours, other excused absence hours, CD/MH and rehab services hours)  
- Weekly check-in (date and method used)  
- Bi-weekly verification of job contact (note which job contact verified and method used to verify). | |
| | Signatures/dates  
- Both participant and ESP. | |

*Family Stabilization Services – See Appendix E of Employment Services Manual for the complete Supervision, Documentation, and Verification Requirements, including Family Stabilization Services (FSS) 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.
<table>
<thead>
<tr>
<th>Activity</th>
<th>Documentation Needed</th>
<th>Notes</th>
</tr>
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</table>
| Providing child care to CSP participant’s    | • Participant’s name  
• Dates covered  
• Number of hours each day  
• Signature of the participant who is engaged in the community service program  
• Name and phone number of the participant engaged in the CSP must also be on the Activity Log or on file. | Monthly hours must comply with FLSA.**                                                                 |
| child(ren)                                   |                                                                                                                                                                                                                       |                                                                      |
| Vocational education                         | • Participant’s name  
• Dates covered (no less frequently than monthly)  
• Number of hours attended each day  
• Responsible individual’s signature (not ESP)  
• Name and phone number of responsible individual must be on file or on Activity Log. | Responsible individual’s signature is not needed if faxed or emailed by the school. |
|                                             | ***See note below about study time allowed for all school-related activities.                                                                                                                                          |                                                                      |
| Job skills training (includes ABE, GED, ESL, FWL) | • Participant’s name  
• Dates covered (no less frequently than monthly)  
• Number of hours attended each day  
• Responsible individual’s signature (not ESP)  
• Name and phone number of responsible individual must be on file or on Activity Log. | Responsible individual’s signature is not needed if faxed or emailed by the school. |
|                                             | ***See note below about study time allowed for all school-related activities.                                                                                                                                          |                                                                      |
| High school                                  | • Participant’s name  
• Dates covered (no less frequently than monthly)  
• Number of hours attended each day  
• Responsible individual’s signature (not ESP)  
• Name and phone number of responsible individual must be on file or on Activity Log. | Responsible individual’s signature is not needed if faxed or emailed by the school. |
|                                             | ***See note below about study time allowed for all school-related activities.                                                                                                                                          |                                                                      |
| Online and distance learning documentation   | • The course/program log-in/log-out electronic record; or  
• Conducted in a supervised setting (name, phone number and signature of a responsible individual is required).                                                    |                                                                      |

**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 a 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 paystubs from the most current month – do not combine paystubs from two months. Example: Participant only sent one paystub for the most current income to date, November 2013. 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. 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.