Minnesota Work Participation Rate Documentation Review Report

Temporary Assistance for Needy Families (TANF)

April-June 2013 quarter, FFY 2013

June 2014

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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 for Needy Families (TANF) regulations require states to develop a work verification plan, and monitor participants’ engagement in work activities in order to verify hours of participation. In fulfillment of this requirement, 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 third report for FFY 2013, covering the April to June 2013 quarter.

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

- Twenty-three of Minnesota’s 87 counties (26 percent) were represented in this quarter’s sample of 68 cases. Fifty 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) and 50 percent did not meet required hours.

- The documentation review found that, of the 68 cases sampled, 43 (63 percent) were correct for documentation of hours and had no error findings. Twenty-five cases (37 percent) had documentation errors. Among the 25 cases that had at least one documentation error:
  o Thirteen cases (19 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 WPR reporting.
  o Nine cases (13 percent) should not have been reported as meeting required hours of participation (did not have enough documented hours).
  o Three cases (4 percent) reported as not meeting WPR should have been reported as meeting the required hours of participation (had enough documented hours).

- Of the 18 zero hour cases, 16 had no documentation errors; one was reported as a zero hour case but the review found 104 hours of earned income that should have been reported; in the other case, the financial worker failed to code MAXIS for Family Stabilization Services (FSS) eligibility. For the 16 zero hour cases with no documentation errors:
  o Cases remained zero hours, ranging from two to 18 months. Two cases had zero hours for more than a year.
  o Thirty-one percent (five) had no engagement (no counted or non-counted hours coded) for the months covered in the review.

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.

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 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” (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 April-June 2013 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.
Twenty-three 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

<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>9</td>
<td>13.2%</td>
<td>Lincoln</td>
<td>1</td>
<td>1.5%</td>
</tr>
<tr>
<td>Blue Earth</td>
<td>1</td>
<td>1.5%</td>
<td>McLeod</td>
<td>1</td>
<td>1.5%</td>
</tr>
<tr>
<td>Cass</td>
<td>1</td>
<td>1.5%</td>
<td>Mahnomen</td>
<td>1</td>
<td>1.5%</td>
</tr>
<tr>
<td>Clay</td>
<td>1</td>
<td>1.5%</td>
<td>Olmsted</td>
<td>2</td>
<td>2.9%</td>
</tr>
<tr>
<td>Dakota</td>
<td>7</td>
<td>10.3%</td>
<td>Otter Tail</td>
<td>2</td>
<td>2.9%</td>
</tr>
<tr>
<td>Dodge</td>
<td>1</td>
<td>1.5%</td>
<td>Ramsey</td>
<td>14</td>
<td>20.6%</td>
</tr>
<tr>
<td>Douglas</td>
<td>1</td>
<td>1.5%</td>
<td>Renville</td>
<td>1</td>
<td>1.5%</td>
</tr>
<tr>
<td>Hennepin</td>
<td>16</td>
<td>23.5%</td>
<td>St. Louis</td>
<td>1</td>
<td>1.5%</td>
</tr>
<tr>
<td>Hubbard</td>
<td>1</td>
<td>1.5%</td>
<td>Stearns</td>
<td>2</td>
<td>2.9%</td>
</tr>
<tr>
<td>Itasca</td>
<td>1</td>
<td>1.5%</td>
<td>Wadena</td>
<td>1</td>
<td>1.5%</td>
</tr>
<tr>
<td>Kandiyohi</td>
<td>1</td>
<td>1.5%</td>
<td>Washington</td>
<td>1</td>
<td>1.5%</td>
</tr>
<tr>
<td>Koochiching</td>
<td>1</td>
<td>1.5%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total</td>
<td>23 counties</td>
<td>68</td>
<td>100%</td>
<td></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 employment services case files to DHS.

During the review 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\textsuperscript{3} and Workforce One\textsuperscript{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 employment services 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 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)

\textsuperscript{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, which began Oct. 1, 2009.

\textsuperscript{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 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.
- Case list with the individual review results
- Detailed individual findings report for each case reviewed (MAXIS information and Employment Services information) that should be placed 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 incorrect cases. 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, 43 (63 percent) were correct, meeting documentation requirements; 25 (37 percent) were incorrect with at least one error.

Among the 25 incorrect cases, 12 had errors that would have changed their status of meeting or not meeting required hours of participation. Details are noted below and summarized in Table 2:

- Thirteen cases (19.1 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 (13.2 percent) should not have been reported as meeting required hours of participation (did not have enough documented hours)
- Three cases (4.4 percent) reported as not meeting WPR should have been reported as meeting the required hours of participation (had enough documented hours).

Table 2: Impact of Findings on WPR Reporting

<table>
<thead>
<tr>
<th>Impact on WPR Reporting</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Correct Findings</strong></td>
<td></td>
</tr>
<tr>
<td>Hours correctly reported (43 cases)</td>
<td>63%</td>
</tr>
<tr>
<td><strong>Incorrect Findings</strong></td>
<td></td>
</tr>
<tr>
<td>Hours reported were incorrect but did not impact the WPR (13 cases or 19.1 percent)</td>
<td></td>
</tr>
<tr>
<td>Hours reported as meeting required hours of participation, but did not (nine cases or 13.2 percent)</td>
<td>37%</td>
</tr>
<tr>
<td>Hours reported as not meeting required hours of participation, but did (three cases or 4.4 percent)</td>
<td></td>
</tr>
<tr>
<td>Total (68 cases)</td>
<td>100%</td>
</tr>
</tbody>
</table>

Among the case types reviewed in the sample:
- Sixteen of 18, or 89 percent, of zero hour cases were correct
- Fourteen of 24, or 58 percent, of MAXIS-only cases were correct
- One of six, or 17 percent, of MAXIS/ES cases was correct
- Six of eight, or 75 percent, of WB cases were incorrect
- Six of 12, or 50 percent, of ES-only 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)

<table>
<thead>
<tr>
<th>Case Types Reviewed</th>
<th>Correct Cases</th>
<th>Incorrect Cases</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number</td>
<td>Percent</td>
<td>Number</td>
</tr>
<tr>
<td>Zero Hours</td>
<td>16</td>
<td>89%</td>
<td>2</td>
</tr>
<tr>
<td>WB (MAXIS only)</td>
<td>6</td>
<td>75%</td>
<td>2</td>
</tr>
<tr>
<td>ES-only</td>
<td>6</td>
<td>50%</td>
<td>6</td>
</tr>
<tr>
<td>MAXIS-only</td>
<td>14</td>
<td>58%</td>
<td>10</td>
</tr>
<tr>
<td>MAXIS/ES</td>
<td>1</td>
<td>17%</td>
<td>5</td>
</tr>
<tr>
<td>Total</td>
<td>43</td>
<td>63%</td>
<td>25</td>
</tr>
</tbody>
</table>

Incorrect cases could have either MAXIS or ES errors, or both. The 25 incorrect cases as shown in Figure 1 had 39 errors; 23 errors were ES and 16 MAXIS. The number of errors by case type is shown in Table 3.

Table 3: Errors in Incorrect Cases

<table>
<thead>
<tr>
<th>Case Types</th>
<th>Incorrect Cases</th>
<th>MAXIS Errors</th>
<th>ES Errors</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zero Hours</td>
<td>2</td>
<td>2</td>
<td>0</td>
</tr>
<tr>
<td>WB</td>
<td>2</td>
<td>2</td>
<td>0</td>
</tr>
<tr>
<td>ES-only1</td>
<td>6</td>
<td>1</td>
<td>12</td>
</tr>
<tr>
<td>MAXIS-only2</td>
<td>10</td>
<td>10</td>
<td>2</td>
</tr>
<tr>
<td>MAXIS/ES3</td>
<td>5</td>
<td>1</td>
<td>9</td>
</tr>
<tr>
<td>Total</td>
<td><strong>25</strong></td>
<td><strong>16</strong></td>
<td><strong>23</strong></td>
</tr>
</tbody>
</table>

1. Of the six ES-only cases with errors, one case had a MAXIS and ES error; the remaining five cases had 11 ES errors.
2. One of the 10 MAXIS-only cases had two ES errors; the remaining nine cases had 10 errors.
3. One of the five incorrect MAXIS/ES cases had a MAXIS and ES error; the remaining four cases had eight 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 and have zero countable WPR hours reported for the review month, but can have non-countable hours, as well as job search hours 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 included financial worker failure to do an ES referral or doing it much later, lack of timely assessment for Family Stabilization Services (FSS), failure to sanction timely, as well as other case management and engagement issues.

As shown in Table 4, 16 of the 18 zero hour cases had no documentation errors. One case was reported as zero hour but the review found 104 hours of earned income that should have been reported. In the other case, the financial worker failed to code MAXIS for FSS eligibility.

Table 4: Zero Hour Case Findings and Error Details

<table>
<thead>
<tr>
<th>Case Findings</th>
<th>16 (89 percent) cases had correct findings</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2 (11 percent) cases had incorrect findings with two errors.</td>
</tr>
</tbody>
</table>

Error Details
Case one (one MAXIS error)—Zero hours reported, but 104 verified for the June 2013 review month. The participant reported starting a new job in May. The financial worker sent an Employment Verification Form to the participant requesting that it be returned later in May. MFIP was subsequently closed in July as participant did not submit the requested information. However, the participant submitted pay stubs for May, June and July in late July. In July, the county agency received a work number response listing all pay dates from May through July. It also received the completed Employment Verification Form in August. The worker entered earned income information on the prospective side of the June JOBS panel and the correct hours, but these hours were not reported as the ‘Ver’ field on the JOBS panel indicated ‘No Ver Prvd.’ Since the panel was updated in July, the same date the work number verification was received, it was assumed during the review that the worker overlooked correcting this information. Had this been done, the hours reported would have been sufficient to meet the WPR hourly requirement.

Case two (one MAXIS error)—Zero hours were reported during the review month of April 2013, but the review cited an error for failure to code for FSS. The participant applied for and was approved for MFIP in March. The financial worker received a medical opinion form (MOF) in March stating the participant is unable to work and the condition will last more than 30 days. The financial worker case noted on 03/22/13, when the MOF was received, but no action was taken. The financial worker should have coded this case FSS and followed up with a status update to employment services. The case was coded FSS on 07/16/13; it was being counted in the denominator for several months when it should not have been.
Case Management for Correct Zero Hour Cases

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

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

<table>
<thead>
<tr>
<th>Handled Correctly</th>
<th>Review Month Description of Case Management</th>
</tr>
</thead>
</table>
| 11 (69 percent) ES (11) | • Case in process of being, or is currently sanctioned, for the review month (9)  
  • Job search hours reported as “other” for WPR (1)  
  • First month on assistance and no work activity assigned—review month (1)  
  • Child under age 1 exemption in effect for review month (1) |
| **Handled Incorrectly** | |
| 5 (31 percent) ES (5) | • Failure to sanction timely (2)  
  • Activity open, but no counted hours tracked (1)  
  • Failure to assess for FSS eligibility (1)  
  • Failure to act on a referral from the county agency (1) |

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=16), the cases remained zero hours ranging from two to 18 months. Two cases have been zero hours for more than a year. 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, 31 percent of the 16 cases 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

<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>2-5 months</td>
<td>11 (68.8%)</td>
<td>No engagement</td>
<td>4</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Some engagement</td>
<td>7</td>
<td>1.4</td>
</tr>
<tr>
<td>6-12 months</td>
<td>3 (18.8%)</td>
<td>No engagement</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Some engagement</td>
<td>3</td>
<td>2.3</td>
</tr>
<tr>
<td>13-18 months</td>
<td>2 (12.5%)</td>
<td>No engagement</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Some engagement</td>
<td>1</td>
<td>17</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>16</td>
<td><strong>No engagement</strong></td>
<td>5 (31%) *</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>Some engagement</strong></td>
<td>11 (69%)</td>
<td>3.1</td>
</tr>
</tbody>
</table>

* The five cases with no engagement were zero hour cases ranging from two months to 18 months, averaging six months; it would have averaged three months if the one case with 18 months was excluded.
**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 (WB) Cases. WB cases are all MAXIS cases in the numerator of WPR reporting.

Of the eight WB cases in the sample, six were correct. The two incorrect cases had errors that resulted in a discrepancy of hours submitted in federal reporting, but the errors did not have a direct impact on the WPR. The review result and error details for WB cases are summarized in Table 7:

<table>
<thead>
<tr>
<th>Case Findings</th>
</tr>
</thead>
<tbody>
<tr>
<td>6 (75 percent) had correct findings</td>
</tr>
<tr>
<td>2 (25 percent) had incorrect findings with two MAXIS errors.</td>
</tr>
</tbody>
</table>

**Error Details**
Case one (one MAXIS error)—132 hours were reported, but 143 were verified. The review cited an error as the financial worker combined income from two months. The WB policy is to use the most current actual income and hours, with income and hours from the same month. This case was a WPR numerator case; the change would not have affected its numerator status.

Case two (one MAXIS error)—150 hours were reported, but 132 were verified. The initial month of WB was February 2013 and was approved in April 2013. The financial worker noted on May 30, 2013 that the agency received check stubs on May 2, 2013 and May 30, 2013 and used the YTD to determine the May 16, 2013 check, however, did not update the JOBS panel with the current information. 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 the participant submits new information on their earned income. This case was a WPR numerator case; the change would not have affected its numerator status.

**MAXIS-only Cases (n=24)**
MAXIS-only cases are those with paid employment with at least one countable hour for the WPR. Of the 68 cases, 24 were MAXIS-only cases (35 percent); 14 of the 24 cases were correct. Among the 10 cases with documentation errors:

- Seven had errors that resulted in a discrepancy of hours submitted in federal reporting; the errors did not have a direct impact on the work participation rate
- Two should have been reported as meeting required hours of participation (had enough hours to meet required number of participation hours)
- One should not have been reported as meeting 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 8.

Table 8: MAXIS-only Case Findings and Error Details

<table>
<thead>
<tr>
<th>Case Findings</th>
</tr>
</thead>
<tbody>
<tr>
<td>14 (58 percent) had correct findings</td>
</tr>
<tr>
<td>10 (42 percent) had incorrect findings, with 10 MAXIS and two ES errors.</td>
</tr>
</tbody>
</table>

**Error Details**

Case one (two MAXIS errors)—220 hours were reported, but 128 were verified. The participant had two separate jobs in the review month and there was an error for each of these jobs. Job one: 160 hours reported, but 87 verified. The reason for the error was the financial worker’s misunderstanding of the work hours as stated on the pay stubs. The hours in question were those referred to as “D1 vacation” which had a pay rate of $2.20. The financial worker included the hours under this category when arriving at the total hours for this job. During the review, it was determined that the number of hours listed for “D1 vacation” were already included in the number of hours under the category referred to as simply “D1” which had a pay rate of $21.58; both categories of pay listed the same number of hours. Because they were the same hours, they should not have been counted separately. Job two: 60 hours reported, but 41 verified. The reason for the error was the financial worker’s miscalculation of the year-to-date totals in determining the gross wages and hours for one of the review month paychecks. Had the hours been correctly calculated, this case should not have been reported as meeting the required hours of participation in the WPR.

Case two (one MAXIS error)—40 hours were reported, but 95 were verified for the review month of April 2013. The participant applied for MFIP on March 19, 2013. On March 25th, they called and reported starting a job on April 15th working 40 hours per week at $12.25. She stated she expected to receive her first paycheck on April 30th for one full week. The financial worker prospected $490 and 40 hours with a start date of April 30th and approved MFIP on March 27th for April 2013 and closed MFIP prospectively for May 2013. The financial worker should have requested employment verification before calculating prospective income and hours and approving the MFIP grant. The financial worker did not request employment verification until June 11, 2013 and verification was received on June 17, 2013 showing 95 hours worked for April 2013. Had the additional hours been correctly reported, this case would have met the required hours of participation in the WPR.

Case three (one MAXIS error)—61 hours were reported, but 111 verified for the review month of April 2013. The participant had two jobs in the review month. Total hours for both jobs in the review month were 90 + 21 = 111. The hours reported for the WPR for the review month were 61 (40 from employer one and 21 from employer two). These were prospectively budgeted hours as the retrospective budget of April through June 2013 was not entered until July 30th which was beyond the "freeze date" for capturing April 2013 hours. It is not clear why the financial worker waited until July 30th to enter the April 2013 earned income hours. Although the April 2013 HRF was not submitted until June 13, 2013, it appeared that the pay stubs for both jobs had been received in time to enter hours on the JOBS panel before the "freeze date" of June 30, 2013. Had these hours been correctly reported, this case would have met the required hours of participation in the WPR.

Case four (one MAXIS error)—148 paid employment hours were reported for the review month of May 2013; the review verified 148. These reported hours were from Employer #2.
Table 8: MAXIS-only Case Findings and Error Details

where the participant started working on April 25th. Prior to Employer #2, the participant had worked for Employer #1 for just 2-3 days from April 22-April 24. (According to start work information received from Employer #1, the expended first check was to be received May 10th.) The stop work verification from Employer #1 was found in the financial case file; however, there was no indication of the wages and hours for the time spent with this employer and the review did not find any pay stub for this employer. And error was cited due to the failure to document whether the participant received compensation for the days she worked for Employer #1 and, if so, to report the hours along with the other paid employment hours from Employer #2. This was a WPR numerator case; the change would not have affected its numerator status.

Case five (one MAXIS error)—116 retrospective hours were reported, but 98 were verified for the review month of April 2013. There were no hours listed on pay stubs and no employer verification form on file for this job to determine how much the participant was paid per hour. The review did find the employment plan on file dated January 11, 2013 which listed the participant's job and rate of pay ($7.50 hour) for her cleaning job. This was a WPR numerator case; the change would not have affected its numerator status.

Case six (one MAXIS error)—135 hours were reported, but 138 were verified for the review month of May 2013. The error was simple math; the participant received two paychecks in May: one with 66.08 hours and the other with 71.75 hours. The May hours totaled 137.86, or 138 when rounded. This was a WPR numerator case; the change would not have affected its numerator status.

Case seven (one MAXIS error)—39 hours of paid employment were reported, but 38 verified for the review month of April 2013. Prospective hours were reported as the case was closed for May 2013, and no retrospective hours were entered on MAXIS. The financial worker used the February 2013 paychecks to prospect the April 2013 income and hours. The participant is paid weekly and there were four pay dates in February and April 2013. Using the February 2013 paychecks, the participant worked 38.14 hours, rounded to 38. The case was closed for May 2013 and therefore, the hours reported for the WPR were prospective hours instead of retrospective hours. This case was not in the numerator value of the WPR; the change would not have affected the WPR.

Case eight (one MAXIS error)—30 retrospective hours of paid employment reported, but 20 were verified for the review month of June 2013. The hours recorded were inconsistent with documentation in the case file. There were two pay dates in the review month with 10.5 and 9.0 hours, totaling 19.50, rounding up to 20 hours. This case was not in the numerator value of the WPR; the change would not have affected the WPR.

Case nine (two ES errors)—15 hours were reported (seven hours of paid employment on MAXIS and eight holiday hours on WF1), but seven verified for the review month of May 2013. The paid employment hours were documented correctly in MAXIS. For the eight hours of holiday time reported on WF1 under unpaid work experience, the participant was not doing unpaid work experience, but was doing a subsidized job through Anoka County during the review month. The eight holiday hours were reported for WPR under the wrong activity, and the review cited an error for these hours. The ES worker could have coded holiday hours under the job search activity, but only two hours would be allowed as the participant's EP stated that
Table 8: MAXIS-only Case Findings and Error Details

<table>
<thead>
<tr>
<th>Case Findings</th>
<th>Error Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Six (50 percent) had correct findings</td>
<td>Five should not have been reported as meeting required hours of participation (did not have the required number of verifiable participation hours)</td>
</tr>
<tr>
<td>Six (50 percent) had incorrect findings, with 12 ES and one MAXIS errors.</td>
<td>One had errors, but the errors had no direct impact on the WPR, resulting in a discrepancy of hours submitted in federal reporting.</td>
</tr>
</tbody>
</table>

ES-only Cases (n=12)

There were 12 ES-only cases in the sample. Six of the 12 cases had correct findings and six had documentation errors. Among the six cases with documentation errors:

- Five should not have been reported as meeting required hours of participation (did not have the required number of verifiable participation hours)
- One had errors, but the errors had no direct impact on the WPR, resulting 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

<table>
<thead>
<tr>
<th>Case Findings</th>
<th>Error Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Six (50 percent) had correct findings</td>
<td>Five should not have been reported as meeting required hours of participation (did not have the required number of verifiable participation hours)</td>
</tr>
<tr>
<td>Six (50 percent) had incorrect findings, with 12 ES and one MAXIS errors.</td>
<td>One had errors, but the errors had no direct impact on the WPR, resulting in a discrepancy of hours submitted in federal reporting.</td>
</tr>
</tbody>
</table>

Case one (3 ES errors)—130 hours were reported, but 42 hours verified. The three errors were: missing employment services provider (ESP) method of bi-weekly verification of at least one job contact; no documentation that weekly check-in meetings occurred; and missing one or more time sheet(s) or activity log(s) for hours reported. During the review, it was noted that the form used by the ES worker for documentation of job search hours is not DHS-5784 (MFIP/DWP Employment Services Weekly Job Search Activity Log). This form was created by DHS and required for use with those participants engaged in job search activities. In addition to the area on the agency's form for entering information about job search contacts, DHS-5784 has an area on the back of the form for including on-site job search/job club activities, and another area (for agency use only) where the ES worker adds up the types of hours, checks off the date/type of weekly check-ins, and notes the bi-weekly job contact/method of verification. Had DHS-5784 been used, it was more likely that the ES worker would have gathered the required documentation and avoided errors. Had the hours been correctly recorded, this case would not have been reported as meeting required hours of participation in the WPR.

Case two (one ES error)—105 hours were reported, but zero hours verified. No time sheet (or activity log) or group attendance sheets were in the case file to verify the 105 hours reported. This case should not have been reported as meeting required hours of participation in the WPR.
Table 9: ES-only Case Findings and Error Details

<table>
<thead>
<tr>
<th>Case Findings</th>
<th>Error Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Case three</td>
<td>130 job search hours were reported, but 39 hours verified. Hours recorded in WF1 were inconsistent with documentation in the case file. This case should not have been reported as meeting required hours of participation in the WPR.</td>
</tr>
<tr>
<td>Case four</td>
<td>87 hours of job search were reported, but 41 hours were verified. The 87 hours included 71 job search and 16 excused absence hours. Three errors were cited during the review: missing client's signature on activity log/group attendance sheet stating log/hours are accurate; missing ESP method of bi-weekly verification of at least one job contact; and missing information on the job search activity log. In addition, there was no WF1 case note regarding the reason for allowing the excused absence hours. This case should not have been reported as meeting required hours of participation in the WPR.</td>
</tr>
<tr>
<td>Case five</td>
<td>87 hours were reported, but zero hours verified. The three errors cited during the review were: missing ESP method of bi-weekly verification of at least one job contact, missing signature of job counselor or other individual who oversees job search/job readiness activity and no documentation weekly check-in meetings occurred. This case should not have been reported as meeting required hours of participation in the WPR.</td>
</tr>
<tr>
<td>Case six</td>
<td>Nine hours of job skills training activity were reported, but zero hours verified. The ES hours were not accepted during the review as they should have been reported under job search/job readiness activity (the participant was involved in a program in which activities were better described as life skills than job skills). There was also a MAXIS error cited due to incomplete documentation of possible work hours. Although no work hours were reported for the review month, the county agency had failed to obtain stop work verification for a job the participant reported had ended March 8, 2013. This case was not in the numerator value of the WPR; the change would only have impacted hours reported, not the WPR.</td>
</tr>
</tbody>
</table>

MAXIS/ES Cases (n=6)
There were six MAXIS/ES cases in the sample; five with documentation errors. Among the documentation errors:

- Three should not have been reported as meeting required hours of participation (did not have required number of verified participation hours)
- Two cases were in the numerator value of the WPR but the change would only have impacted hours reported, not the 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

<table>
<thead>
<tr>
<th>Case Findings</th>
<th>Error Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>One (17 percent) had correct findings</td>
<td></td>
</tr>
<tr>
<td>Five (83 percent) had incorrect findings, with nine ES and one MAXIS errors.</td>
<td></td>
</tr>
<tr>
<td>Error Details</td>
<td></td>
</tr>
<tr>
<td>--------------</td>
<td></td>
</tr>
<tr>
<td>Case one (three ES errors) — 130 hours were reported, but 118 verified. The 118 hours verified as correct were MAXIS hours. The remaining 12 hours were job search hours and found to be incorrect due to missing ESP method of bi-weekly verification of at least one job contact, missing signature of job counselor or other individual who oversees job search/job readiness, and other employment services activity documentation/verification errors. The other employment services activity documentation/verification errors were: missing information on the front of the log to be completed by the participant, For Agency Use Only area not completed by ES worker, and missing logs for weeks three and four. The 12 job search hours should not have been reported as they lacked the necessary documentation; without these hours, the hourly requirement for the WPR (130) would not have been met.</td>
<td></td>
</tr>
<tr>
<td>Case two (two ES errors) — 87 hours were reported, but 46 hours verified. The two errors cited during the review were: no documentation that weekly check-in meetings occurred, and missing ESP method of bi-weekly verification of at least one job contact. The participant completed and turned in job search logs for weeks one, two, three, four and five; all were incomplete as the ES worker did not complete the back of the job search logs. Case note stated job search logs were turned in, but the ES worker needs to complete the back of the job search log about weekly check-in and bi-weekly verification of job search contacts. Had hours been correctly recorded, this case would not have been reported as meeting required hours of participation in the WPR.</td>
<td></td>
</tr>
<tr>
<td>Case three (two ES errors) — 87 hours were reported, but 53 hours verified. The two errors cited during the review were: missing ESP method of bi-weekly verification of at least one job contact, and no documentation that weekly check-in meetings occurred. Had the hours been correctly recorded, this case would not have been reported as meeting required hours of participation in the WPR.</td>
<td></td>
</tr>
<tr>
<td>Case four (one ES error) — 174 hours were reported, but 160 verified. There were 14 hours of unpaid work activity reported for the review month of May 20, 2013; these hours were not accepted in the review. A data discrepancy error was cited as unpaid work activity hours on the log conflicted with the participant's work hours in the review month. The participant started working in May 2013. Prior to being hired as a full-time employee, the participant was doing unpaid work activity with this same business. The participant submitted an employment verification form completed by the employer on May 6th that stated the participant had started the job on May 6th. However, the participant later submitted pay stubs for May that show pay dates of May 10th and May 24th, each listed 80 work hours. The pay period for the first pay date was April 27th – May 10th. Since the pay stubs were issued by the employer after the completion of the Employment Verification form, the pay stubs were determined to be the more accurate documentation of the start work date. The unpaid work documentation in the ES case file listed 14 hours of activity for the days May 1st (five hours), May 2nd (five hours), and May 3rd (four hours). It did not seem likely that the participant would work eight hours a day and do an additional four-five hours of unpaid work activity. This case was in the numerator value of the WPR, but the change would only have impacted hours reported, not the WPR.</td>
<td></td>
</tr>
<tr>
<td>Case five (one MAXIS, one ES error) — 159 hours were reported (84 paid employment and 75 WF1 hours), but 131 hours verified. Both errors were cited because the hours recorded in both MAXIS and ES were inconsistent with documentation in case files. There were 84 hours of</td>
<td></td>
</tr>
</tbody>
</table>
The financial worker only entered two pay dates on the JOBS panel; the third was not entered. In addition, 75 hours were tracked on WF1 and reported for WPR. Six hours were verified from documentation in the file. The participant reported taking seven credits. There were no documents such as a class schedule or anything from the school in the case file showing how many credits the participant was taking. There was a study statement on file and the review allowed one hour per class hour that was coded on the log. Because there was only one class coded on the log for three hours, the review allowed three hours of class plus three hours of study time, a total of six hours for the month. There were other entries for study and homework, but no other class time was documented. This case was in the numerator value of the WPR, but the change would only have impacted hours reported, not the WPR.

C. Impact of Errors on the Work Participation Rate

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

<table>
<thead>
<tr>
<th>Cases Reported as Meeting the Required Hours of Participation (n=34)</th>
<th>Cases</th>
</tr>
</thead>
<tbody>
<tr>
<td>No documentation errors</td>
<td>18</td>
</tr>
<tr>
<td>Documentation errors (but still met required hours of participation)</td>
<td>7</td>
</tr>
<tr>
<td>Documentation errors (did not have required number of verifiable participation hours)</td>
<td>9</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Cases Reported as Not Meeting Required Hours of Participation (n=34)</th>
<th>Cases</th>
</tr>
</thead>
<tbody>
<tr>
<td>No documentation errors</td>
<td>25</td>
</tr>
<tr>
<td>Documentation errors (but still did not meet required hours of participation)</td>
<td>6</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>
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, shows the importance of accurate and detailed case management.

In this quarter’s sample of 68 cases, 63 percent (n=43) were correct for verification of hours reported in the WPR for the review month. These cases had no documentation errors. Nineteen percent (n=13) had errors, but did not impact the federal Work Participation Rate, but had discrepancies in the number of hours submitted in federal reporting. Thirteen percent (n=9) had errors and should not have been reported as meeting required hours of participation (did not have enough documented hours). Just over four percent (n=3) were reported as not meeting WPR, but should have been reported as meeting required hours of participation (had enough documented hours).

MAXIS/ES cases (n=6) had the highest error rate (83 percent), followed by ES-only cases (n=12) at 50 percent.

A common error was discrepancy between what is recorded in MAXIS or WF1 systems and what was in the case file. There were also a few errors related to the application of policy. Addressing these errors can significantly reduce documentation errors.

Of the 16 MAXIS errors in the sample (Table 3), the two most common were ‘hours recorded were inconsistent with documentation in case file’ and ‘incomplete documentation of work hours (missing a pay stub or other employer produced document.’

Of the 23 ES errors in the sample, the two most common were ‘missing employment services provider method of bi-weekly verification of at least one job contact’ and ‘no documentation that weekly check-in meetings occurred.’

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 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 calculations. If new information becomes available, reassess WB eligibility.

MAXIS/Employment Services:
- **Review the manual for policy information.** Review the appropriate manual to clarify correct policy and apply it to a case.

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/lfserver/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/main/id_016956
http://www.dhs.state.mn.us/dhs16_166327.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 additional information that could be provided in future reports. Send comments and/or ideas 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

- 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/lfserver/Legacy/DHS-2883-ENG
  - DHS-3336-ENG 8-08, Self Employment Report Form: https://edocs.dhs.state.mn.us/lfserver/Legacy/DHS-3336-ENG
  - DHS-5006F-ENG 1-13, Earned Income/Pay Period/Date Tracking Form–2013: https://edocs.dhs.state.mn.us/lfserver/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/lfserver/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 ESP 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

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

- 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](http://www.dhs.state.mn.us/dhs16_156020.pdf)

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

*Family Stabilization Services* – See Appendix E of [Employment Services Manual](http://www.dhs.state.mn.us/dhs16_156020.pdf) 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 FSLA. 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>
</thead>
</table>
| Providing child care to a CSP participant’s child(ren) | • 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.** |
| 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 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 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, 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 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.