Minnesota Work Participation Rate Documentation Review Report

Temporary Assistance for Needy Families (TANF)

Quarter 1, Federal Fiscal Year 2014
(October—December 2013)

November 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 included in the 2005 Deficit Reduction Act (DRA) legislation requires states to develop a work verification plan, and monitor participants’ engagement in work activities to verify hours of participation.

In fulfillment of the latter requirement, the Minnesota Department of Human Services reviews a quarterly random sample of 68 TANF cases. Detailed findings of documentation reviews are shared with sampled counties, and quarterly reports with aggregate results are published on CountyLink.

This is the first quarterly report of FFY 2014, covering October to December 2013. Key findings from this quarter’s documentation review of hours reported for the Work Participation Rate (WPR) report are highlighted below:

- Based on the documentation review of the 68 cases:
  - Nine cases, 13 percent, had critical documentation errors that had a direct impact on the state’s Work Participation Rate—prompting a change in the case’s WPR denominator and/or numerator status. Two of the nine cases should have been excluded from WPR reporting, and seven did not have adequate documentation on file to verify meeting the WPR required hours, as reported.
  - Twenty-eight cases, 41 percent, had technical documentation errors. Technical errors may have resulted in a change in the number of hours reported, but cases would remain in the denominator or numerator values of the Work Participation Rate, as reported.
  - Thirty-one cases, 46 percent, had no documentation errors.

- Of the 68 cases reviewed for documentation of hours, 34 were reported as meeting (numerator cases) and 34 not meeting (non-numerator cases) required WPR hours.
  - Among the numerator cases, 38 percent had no documentation errors, 41 percent had technical errors, and 21 percent had critical errors.
  - Among the non-numerator cases, 53 percent had no documentation errors, 41 percent had technical errors, and 6 percent had critical errors.

- Of the various case types reviewed, cases with Employment Services (ES) activities had the highest rate of critical documentation errors (50 percent), followed by cases with both MAXIS and ES activities at 25 percent.

- While there were a range of error causes, the most common were missing appropriate documentation in the case file to verify hours reported, or a discrepancy between what was in the case file compared to what was recorded in the information systems.

The Minnesota Department of Human Services continues to disseminate information to assist county financial workers and Employment Services workers to correctly document and report participant activities. Each quarter, the department provides county-specific reports on case findings with tip sheets and other resources to better coach workers on respective 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). TANF regulations require states to develop a work verification plan, and monitor participants’ engagement in work activities to verify hours of participation.¹

Minnesota’s Verification Process

The Minnesota Department of Human Services (department), Economic Assistance and Employment Supports Division (EAESD), is responsible for monitoring participants’ engagement 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.²

“The MFIP Employment Services Manual”³ (MFIP ES Manual) includes the MFIP Activity Daily Supervision, Documentation and Verification Guide in Appendix E. The guide lists documentation requirements for both MAXIS and Employment Services (ES) activities. The review process uses this primary resource as guidance in determining if case file documentation and verification meet federal requirements. Reviews examine financial and employment services files, and supporting documentation of hours for cases in the selected review month.

Sample Selection

In this first quarter of FFY 2014, department staff reviewed a statewide random and stratified sample of 68 TANF and Work Benefit (WB) cases that were reported in the federal WPR denominator for a month in the review quarter.⁴ The sample was stratified to include 50 cases with at least one hour of core and/or non-core activity (eight of which were WB cases), and 18 cases with zero countable hours in one or more months in the review quarter. Each sample of the 68 cases was selected from the preceding quarter after all data was frozen for federal reporting purposes.

Case Types

Findings are presented in both aggregate and case type summaries. Case types are defined below:

Zero Hours

Zero hour cases are in the denominator of the federal WPR and have zero countable WPR hours reported for the review month, but can have non-countable hours such as job search hours reported as “other” work activities (total hours are less than TANF required hours), 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. However, zero hour cases are reviewed for case management issues and engagement in non-countable activities.

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/groups/publications/documents/pub/dhs16_168871.pdf
³ Available at: http://www.dhs.state.mn.us/main/id_016957.
⁴ The sample of 68 has a 90 percent confidence interval with 10 percent precision, assuming an error rate of 50 percent for a universe of 7,000 or greater. The universe included work eligible individuals, excluding ineligibles.
Work Benefit

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

MAXIS-only

Paid employment (regular and self-employment) hours are recorded and tracked on the MAXIS system. When cases are exclusively paid employment (no hours reported for Employment Services activities), they are referred to as MAXIS-only cases.

ES-only

Cases with countable Employment Services activities, but no paid employment hours, are referred to as ES-only cases.

MAXIS/ES

Cases with both paid employment hours and countable Employment Services activities are referred to as MAXIS-ES cases.

Review Process

During the review process, department staff audit case files to ensure there is appropriate documentation to verify participant’s hours submitted in federal TANF reports (based on data from MAXIS\(^5\) and Workforce One\(^6\)). Beginning this quarter, reviewed cases will receive one of three findings: (1) No documentation error(s); (2) Technical documentation error(s); or (3) Critical documentation error(s) as follows:

- **No documentation error(s)** means that the hours reported in WPR were confirmed to be correct after documentation review.

- **Technical documentation error(s)** means that a documentation review found error(s) that could have prompted a revision in the hours reported, but not a change in the numerator or denominator disposition of the WPR.

- **Critical documentation error(s)** means that a documentation review found error(s) that prompts a change in the numerator and/or denominator disposition of the WPR. Critical errors have a direct impact on the state’s WPR. Examples of critical errors include:
  - Cases reported as having sufficient hours to meet the WPR required hours, but a review did not find documentation of sufficient hours on file.

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\(^5\) 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.

\(^6\) 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 activities, including recording hours of participation in non-paid employment services activities, in-kind work and school attendance for teen parents.
- Reported as having insufficient hours to meet the WPR required hours, but a review found sufficient hours documented on file
- Included in the denominator and/or numerator values of the WPR, but a review found documentation to substantiate that the case should have been excluded from WPR reporting.

While the same error cause could result in a critical error in one case and a technical error in another, the difference in classification is the result of its impact or no impact on the state’s work participation rate.

After case reviews are completed, a detailed report is generated for each case and sent to the respective county for analysis. 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. Addressing both critical and technical errors will lead to better case management. All feedback is reviewed; the final determination of each case is validated before the data is aggregated, analyzed and published in quarterly reports.

**Review Findings Reports**
Separate reports are issued with each quarter’s sample, findings and results and can be accessed on CountyLink under the sub-menu CountyReports/Results, and the section titled, Minnesota TANF Work Participation Rate Documentation Reviews.
Section II: Review Findings

A. Findings Summary

Chart 1: Findings Summary of Sampled Cases (n=68)

<table>
<thead>
<tr>
<th>WPR Status</th>
<th>No Errors</th>
<th>Technical Errors</th>
<th>Critical Errors</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>All Sampled Cases</td>
<td>31</td>
<td>28</td>
<td>9</td>
<td>68</td>
</tr>
</tbody>
</table>

B. Findings by Case Type

Chart 2: Findings by Case Type (n=68)

<table>
<thead>
<tr>
<th>Case Type</th>
<th>No Errors</th>
<th>Technical Errors</th>
<th>Critical Errors</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zero Hour</td>
<td>14</td>
<td>3</td>
<td>1</td>
<td>18</td>
</tr>
<tr>
<td>Work Benefit</td>
<td>3</td>
<td>5</td>
<td>-</td>
<td>8</td>
</tr>
<tr>
<td>MAXIS-only</td>
<td>13</td>
<td>9</td>
<td>-</td>
<td>22</td>
</tr>
<tr>
<td>ES-only</td>
<td>-</td>
<td>6</td>
<td>6</td>
<td>12</td>
</tr>
<tr>
<td>MAXIS/ES</td>
<td>1</td>
<td>5</td>
<td>2</td>
<td>8</td>
</tr>
</tbody>
</table>
C. Findings by Numerator and Non-numerator Cases

Chart 3: Findings for Cases in the Numerator and Non-numerator Values of the WPR (n=68)

<table>
<thead>
<tr>
<th>WPR Status</th>
<th>No Errors</th>
<th>Technical Errors</th>
<th>Critical Errors</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>I. Numerator cases (reported as meeting required WPR hours)</td>
<td>13</td>
<td>14</td>
<td>7</td>
<td>34</td>
</tr>
<tr>
<td></td>
<td>No Errors</td>
<td>Technical Errors</td>
<td>Critical Errors</td>
<td>Total</td>
</tr>
<tr>
<td>II. Non-numerator Cases (reported as not meeting required WPR hours)</td>
<td>18</td>
<td>14</td>
<td>2</td>
<td>34</td>
</tr>
</tbody>
</table>
### D. Findings by County

Table 2: County Findings by Numerator and Non-numerator Cases (n=68)

<table>
<thead>
<tr>
<th>County</th>
<th>Numerator Cases (reported as meeting required WPR hours) (n=34)</th>
<th>Non-numerator Cases (reported as not meeting required WPR hours) (n=34)</th>
<th>Total Cases</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>No Errors</td>
<td>Technical Errors</td>
<td>Critical Errors</td>
</tr>
<tr>
<td>Anoka</td>
<td>1</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>Becker</td>
<td>1</td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>Beltrami</td>
<td>1</td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>Benton</td>
<td>1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Clay</td>
<td></td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>Dakota</td>
<td>1</td>
<td></td>
<td>2</td>
</tr>
<tr>
<td>Dodge</td>
<td>1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fillmore</td>
<td></td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>Hennepin</td>
<td>2</td>
<td>5</td>
<td>4</td>
</tr>
<tr>
<td>Kanabec</td>
<td>1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Kandiyohi</td>
<td></td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>Mower</td>
<td></td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>Nicollet</td>
<td>1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Otter Tail</td>
<td>1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pine</td>
<td></td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>Ramsey</td>
<td>4</td>
<td>3</td>
<td>7</td>
</tr>
<tr>
<td>Rice</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>St. Louis</td>
<td>2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sherburne</td>
<td>1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Waseca</td>
<td>1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Washington</td>
<td></td>
<td></td>
<td>1</td>
</tr>
<tr>
<td></td>
<td>13</td>
<td>14</td>
<td>7¹</td>
</tr>
</tbody>
</table>

¹ These seven cases did not have sufficient documented hours to successfully meet the WPR, as reported.

² These two cases should have been excluded from WPR reporting.
### E. Error Details by Case Type

#### Table 3: Zero Hour Case Findings and Error Summary

<table>
<thead>
<tr>
<th>Case Type</th>
<th>Cases with No Errors</th>
<th>Cases with Critical Errors</th>
<th>Cases with Technical Errors</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zero Hour Cases</td>
<td>14 (78%)</td>
<td>1 (5%)</td>
<td>3 (17%)</td>
<td>18 (100%)</td>
</tr>
</tbody>
</table>

**Critical Error Details** (one case, one critical error)
- Case was eligible for Family Stabilization Services (FSS) under the category of ‘applying for Supplemental Security Income (SSI)/Retirement, Survivors and Disability Insurance (RSDI)’ but no assessment was conducted. Had this case been correctly assessed for FSS, it would have been excluded from federal TANF reporting.

**Technical Error Details** (three cases, three critical errors)
- Zero counted hours were reported by the ES worker, but 32 were found in the ES case file for school attendance (1)
- Zero counted hours were reported, but the county worker did not act on reported earned income information found in the MAXIS case file and failed to request verification (1)
- Zero counted hours were reported by the county worker, but the review found hours from two jobs in the MAXIS case file (1).

#### Table 4: Work Benefit Case Findings and Error Summary

<table>
<thead>
<tr>
<th>Case Type</th>
<th>Cases with No Errors</th>
<th>Cases with Critical Errors</th>
<th>Cases with Technical Errors</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Work Benefit Cases</td>
<td>3 (38%)</td>
<td>-</td>
<td>5 (63%)</td>
<td>8 (100%)</td>
</tr>
</tbody>
</table>

**Technical Error Details** (five cases, six errors)
- The most current actual income/hours were not used by the county worker to calculate WB eligibility (3)
- WB income/hours were incorrectly calculated by the county worker, using an average—policy states that WB hours should not be averaged (2)
- Both income and hours from a third or fifth paycheck were used by the county worker to calculate eligibility—policy states income can be used, but not the hours from a third or fifth paycheck (1).

#### Table 5: Maxis-only Case Findings and Error Summary

<table>
<thead>
<tr>
<th>Case Type</th>
<th>Cases with No Errors</th>
<th>Cases with Critical Errors</th>
<th>Cases with Technical Errors</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>MAXIS-only Cases</td>
<td>13 (59%)</td>
<td>-</td>
<td>9 (41%)</td>
<td>22 (100%)</td>
</tr>
</tbody>
</table>

**Technical Error Details** (nine cases, nine errors)
- Hours recorded in MAXIS were inconsistent with documentation in the MAXIS case file (6)
- Incomplete documentation of work hours (missing a pay stub(s) or other employer-produced document) to verify hours reported in MAXIS (1)
- Inadequate documentation to determine how prospective budget in MAXIS was calculated (1)
- Earned income documentation found in the case file, but hours not recorded in MAXIS (1).
Table 6: ES-only Case Findings and Error Summary

<table>
<thead>
<tr>
<th>Case Type</th>
<th>Cases with No Errors</th>
<th>Cases with Critical Errors</th>
<th>Cases with Technical Errors</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>ES-only Cases</td>
<td>-</td>
<td>6 (50%)</td>
<td>6 (50%)</td>
<td>12 (100%)</td>
</tr>
</tbody>
</table>

**Critical Error Details** (six cases, eight critical errors)
- Missing name, signature and/or phone number of person providing daily supervision/verifying hours of participation (1)
- Missing statement from school specifying recommended amount of study time (1)
- More study time was allowed without proper documentation, or was not consistent with study time policy (1)
- Math error—simple addition errors (1)
- Fair Labor Standards Act—participant engaged in more than the maximum hours allowed—ES Manual 9.3 (1)
- Hours recorded in Workforce One were inconsistent with documentation in the ES case file (1)
- ES failure to notify county agency of FSS eligibility (1)
- ES worker reported hours based on ES plan rather than what was documented in case file (1).

**Technical Error Details** (Six cases, six technical errors)
- Missing name, signature and/or phone number of person providing daily supervision/verifying hours of participation (2)
- Missing statement from school specifying recommended amount of study time (1)
- Rounding error—Employment Services Manual 9.47 (1)
- Hours recorded were inconsistent with documentation in the case file (1)
- Holiday hours incorrectly used/calculated—ES Manual 9.48 (1).

Table 7: MAXIS/ES Case Findings and Error Summary

<table>
<thead>
<tr>
<th>Case Type</th>
<th>Cases with No Errors</th>
<th>Cases with Critical Errors</th>
<th>Cases with Technical Errors</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>MAXIS/ES</td>
<td>1 (13%)</td>
<td>2 (25%)</td>
<td>5 (63%)</td>
<td>8 (100%)</td>
</tr>
</tbody>
</table>

**Critical Error Details** (two cases, two critical errors—both ES)
- No time sheet (or activity log) or group attendance sheets in case file to verify ES activity hours reported (1)
- No statement from school in file to verify study time reported for ES activity (1).

**Technical Error Details** (five cases, seven technical errors—four MAXIS and three ES)
- Missing time sheet(s) or activity logs(s), for ES activity hours reported in review month (1)
- Missing name, signature and/or phone number of person providing daily supervision/verifying hours of participation for ES activities (1)
- Holiday hours incorrectly used/calculated by ES worker—ES Manual 9.48 (1)
- No pay stubs or employer-produced document submitted with the Household Report Form (1)
- Hours recorded in MAXIS were inconsistent with documentation in the case file (2)
- Earned income documentation found in the case file but hours not recorded in MAXIS (1).
F. Zero Hour Case Management and Engagement

For 14 of the 18 sampled zero hour cases that were considered correct for purposes of the documentation review, six (43 percent) were handled correctly by MAXIS and ES workers, but eight (57 percent) were handled incorrectly by ES workers in the review month (although this did not constitute a documentation error). The common reasons ES cases were handled incorrectly were failure of ES workers to act on cases or failure to sanction timely. Details on the cases handled correctly and incorrectly in the review month are in Table 8.

Table 8: 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>6 (43%)</td>
<td>MAXIS 2</td>
</tr>
<tr>
<td></td>
<td>• Child under age 1 exemption in effect for review month (1)</td>
</tr>
<tr>
<td></td>
<td>• County/ES transfer in progress (1)</td>
</tr>
<tr>
<td></td>
<td>ES 4</td>
</tr>
<tr>
<td></td>
<td>• Case in process of being or currently sanctioned for the review month (2)</td>
</tr>
<tr>
<td></td>
<td>• Job search hours reported as “other” for WPR (1)</td>
</tr>
<tr>
<td></td>
<td>• Participant engaged in “other” activities in review month (1)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Handled Incorrectly</th>
<th>ES 8</th>
</tr>
</thead>
<tbody>
<tr>
<td>8 (57%)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Failure of ES workers to act on case (4)</td>
</tr>
<tr>
<td></td>
<td>• Failure to sanction timely (3)</td>
</tr>
<tr>
<td></td>
<td>• Activity open, but no activity hours tracked (1)</td>
</tr>
</tbody>
</table>

The main scope of documentation reviews was to focus on the review month and report findings about that month. However, the review also examined the number of consecutive months a case had zero countable hours to provide a case management overview of these cases. Although some cases were handled correctly in the review month as discussed earlier, that may or may not be true for other months in zero hour status for a given case. For the zero hour cases with no documentation errors (n=14), the cases remained zero hour ranging from one to 14 months. A distribution is presented in Table 9. 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 9, 57 percent of cases with no documentation errors had no engagement hours coded for the review period. No engagement hours means no countable or non-countable hours coded.

Table 9: Consecutive Months as a Zero Hour Case and Case Management Engagement

<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>9 (64%)</td>
<td>No engagement</td>
<td>7</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Some engagement</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td>6-12 months</td>
<td>4 (29%)</td>
<td>No engagement</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Some engagement</td>
<td>3</td>
<td>3.3</td>
</tr>
<tr>
<td>13-14 months</td>
<td>1 (7%)</td>
<td>No engagement</td>
<td>0</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Some engagement</td>
<td>1</td>
<td>2.0</td>
</tr>
<tr>
<td>Total</td>
<td>14 (100%)</td>
<td>No engagement</td>
<td>8 (57%)</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Some engagement</td>
<td>6 (43%)</td>
<td>2.3</td>
</tr>
</tbody>
</table>
Section III: Conclusion

Documentation reviews showed that 13 percent of cases sampled had critical errors that would result in a change in a case’s denominator and/or numerator status in the WPR. Forty-one percent of cases had technical errors that may have prompted a change in the hours reported, but would not have changed their denominator and/or numerator status in the WPR. While there were a range of error causes, the most common were no documentation for reported hours or a discrepancy between what was in the case file compared to what was recorded in the information systems.

County financial and ES workers can reduce errors by reviewing the specific causes of errors noted in this report and implementing recommendations in Attachments A-D. A review of case file documentation before data entry into MAXIS and Workforce One can minimize inconsistencies between case file and systems data. In addition, collaborative efforts and stronger communication between MAXIS and ES supervisors 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.

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, provides a platform to continuously improve documentation of WPR work, job search and other workforce preparation activities.
Section IV: Attachments
Attachment A: Review Recommendations

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

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

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

http://www.dhs.state.mn.us/main/id_016956
http://www.dhs.state.mn.us/dhs16_166327.pdf

Employment Services:
- **Require participants to provide school statement about recommended amount of study time.** Job counselors must only record documented study time hours when appropriate documentation is provided by a school.
- **Use the department’s 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 all cases.

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 6 years), or 130 hours (youngest child age 6 or older), per month.
  - Self-employment—review the Self-employment Handbook (link below) and policy manuals.
    http://www.dhs.state.mn.us/dhs16_144585.pdf
ES example:
  o Record hours in Workforce One 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.


### Other Recommendations

**Corrective Action**
Department staff recommends that all county agency caseworkers and ES providers review the TANF Work Participation Rate Documentation Reviews – Statewide Corrective Action Process, Attachment B.

**Training Opportunities**
- Attend state presentations and training sessions on the WPR, documentation and verification requirements, and Deficit Reduction Act updates.

- County agencies and ES providers with incorrect review findings are encouraged to work with the department’s Economic Assistance and Employment Supports Division (EAESD) consultants to obtain supplemental instructions and technical assistance. Use the central email address to send in non-policy inquiries about DWP, MFIP and WB to EAESD: dhs.dwp-mfip@state.mn.us.

Examples of inquiries to send to the 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**
Department staff invites county agency staff and ES providers to comment on this report, and provide ideas of additional information for future reports. Send comments and/or ideas to [paul.ramcharit@state.mn.us](mailto:paul.ramcharit@state.mn.us).

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Attachment B: Statewide Corrective Action Process

Minnesota Department of Human Services 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 Table in Appendix E of the MFIP ES Manual. This document is used for 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 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 department’s recommended eDocs forms as follows:
  - 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 Employment Services providers as a tool to assist county agencies in reviewing Employment Services cases for documentation purposes. It is available on CountyLink, DHS Program Resources, 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, available on its website at:

  http://www.positivelyminnesota.com/All_Programs_Services/Work_Participation-MFIP_TANF/index.aspx

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

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**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)*

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<th>Activity</th>
<th>Documentation Needed</th>
<th>Notes</th>
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| (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 Form, [DHS-5784](http://www.dhs.state.mn.us/dhs16_156020.pdf) is mandatory to document job search activity | **Part 1 (Front 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 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, chemical dependency/mental health 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. | |

**Fair Labor Standards Act—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.
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<th>Activity</th>
<th>Documentation Needed</th>
<th>Notes</th>
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| Providing child care to a CSP participant’s child(ren) | • Participant’s name  
• Dates covered  
• Number of hours *each day*  
• Signature of participant who is engaged in the community service program  
• Name and phone number of 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).

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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, and 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 2014. Gross income was $253.75 and total hours were 35. The participant is paid bi-weekly.
  
  Code the JOBS panel with $253.75 for both checks to project income and code 70 hours as the prospective hours.
- Document clearly which income and hours were used to code the JOBS panel.

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

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

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

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

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

**Do Not Code Hours to Meet Work Participation Rate:** Some cases have 90 or 160 hours coded, which does not reflect documented hours in the case file.

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