

General Work Verification Rules

Hours Worked:

For all activities other than self-employment, use the actual hours worked. Hours are verified by employer statement or collateral contact with the supervising organization or their representative.

Hourly wage:

If the client earns commission determine hourly wage by dividing the earnings by the number of hours worked. Earnings are the total amount earned and may be the base salary plus commission.

Note: When hourly wage is under the federal minimum wage:

In cases of in-kind and commission wages where the hourly wage is under the federal minimum wage, the Work Services staff must evaluate with the client whether the employment is the client's best option to achieve self-sufficiency. The discussion and decision to continue the employment or change the Family Self-sufficiency Plan must documented in the case file.

In Kind:

If the client is paid in-kind, determine hourly wage by dividing the value of the goods, shelter or service earned by the number of hours worked.

Rounding:

When counting partial hours for work activities, the rule is to round up to the next full hour. Therefore 1 minute equals one hour.

Special Types of Employment:

In home child-care providers: When a client is providing child care to children in the children's home, the Work Services staff must confirm whether the client is self-employed or an employee.

Please refer to ATAP Manual Section 796-7A for definitions of self-employment.

Americorps/National Guard: To determine hourly wage for Americorps volunteers or National Guard members divide the stipend by the number of hours worked.

Rounding:

Holiday and Excused Absences

Work Services providers are required to comply with the Alaska Work Verification requirements.

Clients in work activities often have appointments, meetings, or family emergencies that may conflict with scheduled activities. Holidays may impact client's ability to engage in activities when the local Job Center, potential employers, a Community Work Experience site or other business is closed for the day. Hours of activity that a client misses due to Excused Absence or a Holiday may be countable if it meets certain criteria.

Work Services providers report countable Excused Absence and Holiday hours in the Work Activity screen of CMS – countable excused absence and holiday hours are added to the total hours of work activity participation for that client in the month reported. Excused absence and Holiday hours are counted towards the total number of hours for the activity missed.

This means that if a client was scheduled to work 90 hours of CWE, and missed 4 hours due to illness, the Work Services staff could report 86 actual hours of CWE (code CW) and 4 hours of Excused Absence from CWE (code CA) for a total of 90 countable hours of CWE that month.

There are eight (8) Excused Absence codes and eight (8) Holiday codes. Please see the “**Work Services Activity Codes**” list for the appropriate Excused Absence and Holiday code for each activity.

Rules for verification and counting of Excused Absence and Holiday hours depend on the work activities the client is assigned to, and when they were scheduled to engage in those activities.

Determining Countable Hours:

Excused Absence and Holiday hours must meet the following criteria in order to be countable and entered into the Work Activity screen of CMS:

The activity missed due to Excused Absence or Holiday is one that is

- Countable
- Assigned to the client
- NOT Paid Employment, Self-Employment, Seasonal Work, or Job Start

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For Excused Absence

The client was scheduled to participate in the activity and would have engaged in the assigned activity had they not been excused from participation.

Work Services staff

Work Services staff Work Services staff use both ATAP policy and their prudent person judgment (PPJ) to determine if an absence from a scheduled activity will be excused.

Reasons a Work Services staff may excuse an absence include but are not limited to:

- A client meets the criteria as exempted from work activity
- A client has good cause
- A client has an appointment or meeting which supports the self-sufficiency, safety, education, health or preservation of their family
- A client has an emergency or challenge to participation such as illness, a sick child, transportation issues, inclement weather, or something else prevents them from participating

NOTE: Excused Absence hours are limited to 16 per month, with a total of 80 hours allowed for the 12-month look back. The 16 hours can be spread over more than two days as long as total hours do not exceed 16 per month and 80 per 12-month look back.

For Holiday

The scheduled activity was not available, or the client was not able to participate in the activity, because it was an allowable holiday.

Holidays allowed under the Alaska Work Verification requirements are:

- New Year's Day
- Martin Luther King's Birthday
- Presidents' Day
- Memorial Day
- Independence Day
- Labor Day
- Columbus Day
- Veterans' Day
- Thanksgiving Day
- Christmas Day

Note: The total number of Holiday hours must not exceed 8 per holiday. If a client is scheduled for less than 8 hours of activity, the total number of holiday hours entered should be the number originally scheduled.

Note: Holiday hours may be counted on the day the holiday is observed if the activity is not available on that day.

EXAMPLE: December 25, 2011 is a Sunday. The Christmas holiday is observed on Monday, December 26th and so holiday hours may be used if an assigned activity is not available that day.

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Work Activity Screen data entry:

For both Excused Absence and Holiday hours, Work Services staff enter the following into the Work Activity Screen in CMS:

- the correct code
- start date
- end date
- actual number of hours the client missed

If a client misses multiple activities, the Work Services staff enters the number of hours missed for each activity using the appropriate Excused Absence or Holiday code. Please see the “**Work Services Activity Codes**” list for the appropriate Excused Absence and Holiday code for each activity.

If missed activities have the same Excused Absence or Holiday code, the Work Services staff may enter the total number of hours missed for both (or multiple activities) using a single code.

Documentation & Verification:

Work Activity hours for Excused Absence and Holiday must be noted in a Client Note (CLNO) in the CMS system. The Client Note must have a TITLE that identifies the month and indicates the note contains information on work activity.

For Excused Absence

- Note what the client’s scheduled hours for each missed activity were on the day(s) the client had an excused absence
- Note the number of hours excused for each activity and the date(s)
- Note why the client was unable to participate and the excuse

For Holiday

- Note what the client’s scheduled hours for each missed activity would have been if there had not been an allowed holiday
- Note the number of hours missed for each activity and which allowed holiday for which the hours were scheduled

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Example:

A client is scheduled to work at a local library Community Work Experience site 4 hours per day Monday – Friday for the month of December. The client is also working on their GED 10 hours per week and drops in the Adult Learning Center as it fits their schedule. The client’s 7 year old was not able to attend school on 12/22 because he had pink-eye, so the client was unable to attend CWE or drop in for GED tutoring that day. The CWE site is closed on Christmas.

CMS Work Activity Data Entry

Act:	Start Date:	End Date:	Auto Thru:	Schd Hrs:	Act
Hours:					
CW	12/1/08	12/31/08			72
E6	12/1/08	12/31/08		36	
CA	12/22/08	12/22/08			4
EA	12/22/08	12/22/08			4
CH	12/25/08	12/25/08			4

Client Note

Client Note Title: Nov Work Act
Scheduled at Library CWE 8-12 Mon – Fri for December
Christmas 4 hrs CWE Holiday
GED tutor scheduled 10 hrs a week, attended 36
Son had pink-eye and couldn’t go to school 12/22; CM excused 4 hrs

CWE &

excused 4 hrs GED since client not able to drop in on 12/22 and limited hours at Adult Learning Center this week

In Hard Copy file

CWE Attendance Form signed by CWE supervisor
Client activity Calendar with signature of Adult Learning Center staff

Please remember: The Work Activity Data Download pulls nine (9) work activity codes for each client per month. If there are more than nine work activity codes entered in a single month, only nine (in no particular order) will be seen and counted by DPA Research toward the monthly participation rate.

Please refer to the Alaska Work Verification requirements for detailed definition of countable work activities, and the rules on counting, verifying, supervising and monitoring hours of client participation in activities.

Job Readiness Health and Safety Activities

Job readiness activities can include short-term substance abuse and, behavioral health treatment, domestic violence counseling or rehabilitation activities (codes B1, B4, B5, B6). When the documentation from the provider is obtained showing that treatment is necessary and/or scheduled, treatment hours are countable. Hours or participation will include hours in:

- family assessment and evaluation;
- occupational or physical therapy;
- individual, and family therapy; and
- behavioral health and substance abuse diagnosis, treatment and peer support meeting

Short – term is defined as 12 or fewer weeks.

Work Readiness must be supervised by a state approved provider. Medical and physical wellness appointments and activities assigned by a health professional or court do not count unless they meet these standards and are verified through documentation from the provider. The end goal for the client must be employment.

Please note: Attendance must be verified in order to be countable and entered into the CMS Work Screen.

Self Employment

Work Services providers are required to comply with the Alaska Work Verification requirements. Rules for verification and counting of self-employment depends DPA eligibility rules as well.

In the case of self-employment, the Work Services staff enters the countable hours for self employment, not the actual hours the client spent in self-employment activities.

The number of countable hours the Work Services staff may enter into the Work Activity screen for self-employment is the adjusted gross income* divided by the federal minimum wage. The adjusted gross income is determined by the DPA Eligibility Technician and is viewable by the Work Services staff on the Case Note screen in CMS. If the ET had determined the adjusted gross income the Work Services staff must use that income in determining countable hours.

If the ET has not determined adjusted gross income, Work Services staff must use eligibility rules to determine adjusted gross income.

- If the client has any approved self-employment expenses, then the Work Services staff will use the self-employment standard deduction of 50% to calculate the adjusted gross income.
- If the client has actual expenses in excess of 50% then the Work Services staff may use actual expenses to determine adjusted gross income.
- If the client states they have no self-employment expenses, or if all self-employment expenses have been subsidized through Work Services supportive services or by another agency, then the full gross income is used to calculate countable hours.

On-going self-employment with regular income:

When the DPA Eligibility worker is able to estimate how much income the client is going to receive on a monthly basis:

* *"Adjusted gross self-employment income" means the total amount of money the trade or business produces less allowable costs of doing business.*

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1. The Work Services staff views the Case Note to see the adjusted gross income.
2. The Work Services staff divides the monthly adjusted gross income by the federal minimum wage to find the monthly countable hours.
3. The Work Services staff Client Notes how they determined the number of countable hours for self-employment for the month.
4. The Work Services staff enters the number of countable hours in the Work Activity screen; hourly wage is the federal minimum wage.
5. The Work Services staff may roll these work activity hours forward for up to six months as appropriate.

EXAMPLE: Sally is an approved childcare provider who has three children in her care. She makes \$1398 per month. Because she had self-employment expenses, her Eligibility worker has established and documented her adjusted gross income as \$699 per month (50% self-employment standard deduction). The Work Services staff will refer to the CANO and use the \$699 and divide by Federal minimum wage to establish hours of reportable work. Document in the CMS work activity screen SE 97 hours at \$7.25. Roll these hours forward for up to six months or until the next eligibility determination. CLNO your calculations steps.

Seasonal self-employment with income that can be estimated before the end of the season:

When the DPA Eligibility worker is able to estimate how much income the client is going to receive for the employment season:

1. The Work Services staff views the Case Note to see the adjusted gross income.
2. The Work Services staff divides the total anticipated adjusted gross income for the season by the federal minimum wage to find the number of countable hours.
3. The Work Services staff Client Notes how they determined the number of countable hours for self-employment for the season, and what months the season includes.
4. The Work Services staff enters the number of countable hours in the Work Activity screen for the months the season included; hourly wage is the federal minimum wage.
5. Work Services staffs may enter the number of countable hours necessary to meet their participation rate for the client in the months the season includes.

EXAMPLE: Jane runs a baked-goods booth at the farmers market on Wednesdays and Saturdays. Last year, based on tax documents, Jane earned

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\$4300 during the season (Memorial Day weekend through Labor Day weekend). Because Jane provided the ET with actual expenses of \$2500 (in excess of 50% standard self-employment expense deduction), her anticipated adjusted gross income is \$1800 based on last year's information because she anticipates doing about the same amount of business. Divide the AGI by the three month season (\$600) then divide the monthly income by federal minimum wage \$7.25. Enter 83 hours of SE for June, July and August. CLNO your calculation steps.

On-going self employment with irregular income:

When the DPA Eligibility worker is not able to estimate how much income the client is going to receive on a monthly basis:

1. WHEN THE CLIENT GETS PAID for their self employment the Work Services staff views the Case Note to see the adjusted gross income.
2. The Work Services staff divides the total adjusted gross income for the period worked by the federal minimum wage to find the number of countable hours.
3. The Work Services staff Client Notes how they determined the number of countable hours for self-employment for the period, and in which month(s) the hours will be entered.
4. The Work Services staff enters hours for the most recent month the client engaged in self-employment to meet the participation rate for that client.
5. If there are additional countable hours available for entry into the Work Activity screen, then the Work Services staff enters hours in the previous month(s) to meet the participation rate for that client; hourly wage is the federal minimum wage.
6. Work Services staffs may enter the number of countable hours necessary to meet their participation rate for the client in the most recent and previous months.
7. If work activity hours are entered in months other than the current month, then the Work Services staff follows their agency's procedures for documenting the change in past month's activity and the agency program manager follows the grievance procedure to both alert DPA and to receive compensation as per their contract.

EXAMPLE: Kevin is an artist. He has several projects, but only has income when his art sells. He reports to his eligibility worker that he sold five pieces of his art when he came into town. He provided sales slips totaling \$1725 and business related receipts. His AGI documented in CANO is \$1725 as he had no self-employment expenses that he paid. Divide \$1725 by federal minimum wage \$7.25. CM can count up to 238 hours of countable SE countable hours. Kevin is a single parent with a child under six and is required 20 hours of weekly participation. Count 80 hours of activities for the most recent month of SE

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activities (June), 80 for the month before (May) and 78 hours for April. All hours with \$7.25 as the hourly wage CLNO your calculation steps. Send information to your program manager to grieve the months that now have been coded with earnings.

Seasonal self-employment with income that can't be estimated in advance:

When the DPA Eligibility working is not able to estimate how much income the client is going to receive for the season:

1. At the END OF THE SEASON (once the client gets paid for their self employment) the Work Services staff views the Case Note to see the adjusted gross income.
2. The Work Services staff divides the total adjusted gross income for the season by the federal minimum wage to find the number of countable hours.
3. The Work Services staff Client Notes how they determined the number of countable hours for self-employment for the season, and in which months the hours will be entered.
4. The Work Services staff enters hours for the most recent month the client engaged in self-employment to meet the participation rate for that client.
5. If there are additional countable hours available for entry into the Work Activity screen, then the Work Services staff enters hours in the previous month(s) to meet the participation rate for that client; if the number of countable hours in the Work Activity screen for the months the season included; hourly wage is the federal minimum wage.
6. Work Services staffs may enter the number of countable hours necessary to meet their participation rate for the client in the months the season includes.
7. If work activity hours are entered in months other than the current month, then the Work Services staff follows their agency's procedures for documenting the change in past month's activity and the agency program manager follows the grievance procedure to both alert DPA and to receive compensation as per their contract.

EXAMPLE: Joe is a self-employed fisherperson. He has not been a commercial fisherman before and does not have tax records to estimate income. He started working with the crew the first week of April and thinks he will be paid in August after the boat is cleaned up at the end of the season. He provides his ET with a copy of his check on August 5th. ET calculates his AGI as \$5689 and documents in CANO. Refer to CANO for the AGI and divide the amount by federal minimum wage to establish 785 hours of SE for the season. Enter 196 hours for July, June, May and April at \$7.25 hourly wage to meet the two parent participation rate. The other hours cannot be used because he was not working on the fishing boat prior to fishing season. CLNO your calculation steps. Send information to your program manager to grieve the months now coded with earnings.

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NOTE: The calculation is correct, however this may be flagged in the inconsistent data report.

Refer to the Alaska Work Verification requirements for detailed definition of self-employment and other activities, and rules on counting, verifying, supervising and monitoring hours of client participation in activities.

Please refer to ATAP Manual Section 759-7 for defining and determining self-employment.

Vocational Education, Education, and Training

Work Services providers are required to comply with the Alaska Work Verification requirements.

Clients may engage in a variety of education and training programs as appropriate to support them in moving towards self-sufficiency. Work Services staff work with each client individually to identify if education and training is an appropriate activity and how to combine it with other work and family support activities.

For ALL Education and Training:

- **Electronic copies of attendance records** may be used to verify educational activities when received directly from the school or training organization's office.
- **Paper copies of attendance records** must be received directly from the school or training organization, or be initialed or signed by school or training organization teacher or designee.

The following determination of countable hour verification, supervision & monitoring procedures are the same for Vocational Education & Training, Job Skills Training, Education Directly Related to Employment, and Attendance at Secondary School.

Determining Countable Hours:

Countable hours include those spent in:

- class
- testing
- supervised study sessions with tutors
- supervised or monitored lab or activity time
- monitored study time

Other countable hours may include the following if they meet specific criteria (listed below):

- distance education
- unsupervised homework

Distance Education: Distance delivered education is only countable when the training program includes mechanisms for providing reports that document progress and the time the student is access the online training

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program.

Reports documenting client attendance in distance education are kept in the case file.

Unsupervised Homework: If the class or program requires students to do homework then one hour of unsupervised homework for each hour of class time is countable. The Work Services staff documents program expectation of homework with a class syllabus or by collateral contact with school or instructor in the case file or a Client Note.

Unsupervised study sessions are reported by the client and documented on a homework log kept in the case file.

If homework is not identified as an expectation then it cannot be counted.

Documentation for all work activity entry must include:

- A Client Note that has a TITLE that identifies the month and indicates the note contains information on work activity;
- the hours and work activity entered for that month
Verification documentation of activity hours.

For all education and training, documentation in the case file must include:

file must include:

- Verification documentation of activity hours.
- Monthly homework log kept by the client (if applicable)
- documentation of expectation of homework in the case file or a Client Note (if applicable)

Special Note – how to count ESL, ABE & College Level education:

English as a Second Language (ESL), Adult Basic Education (ABE) and College Level education may be counted as part of a number of education and training activities.

College Level education refers to post-secondary education which may or may not be part of a program leading to an Associates of Applied Science (AAS), baccalaureate or advance degree.

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Please see the table below for basic guidance on how each of these educational components may fit into Work Activities defined in the Work Verification requirements. For a list of approved programs please see the Alaska Work Verification Plan.

Work Activity	ABE	ESL	College Level Ed
Voc Ed – VE	When required as part of a vocational training plan	When required as part of a vocational training plan	When the class or program directly supports employment in a current or emerging occupation
Job Skills Training – P3	When it is part of short-term training or part of a job skills program	When it is part of short-term training or part of a job skills program	When it is part of short-term training or part of a job skills program
Eng as a 2 nd language – F3		When not otherwise coded	
Ed directly related to employment – I1	When needed to support success in employment	When needed to support success in employment	
GED Prep & ABE – E6	If needed as a prerequisite	If needed as a prerequisite	
GED Prep Teen – E5			
High School Completion – HS			
<i>Post Secondary Ed – P1</i> <i><u>*not countable*</u></i>			<i>When it is not countable as Voc Ed or Job Skills Training</i>