

Approved by ACF 9/29/08

STATE OF ALASKA

WORK VERIFICATION PLAN

Division of Public Assistance,
Department of Health and Social Services
August 29, 2008

This is to certify that the Alaska TANF Work Verification Plan dated August 29, 2008 includes all the information required by the Regulations at 45 CFR 261.62(b) and accurately reflects the provisions under which Alaska will be operating effective October 1, 2008.

Ellie Fitzjarrald, Director

Revised September 26, 2008

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Unsubsidized Employment

Definition - Unsubsidized employment is full- or part-time employment in the public or private sector that is not subsidized by TANF or any other public program. Unsubsidized employment includes self-employment and seasonal employment. It also includes apprenticeships and internships when the participant receives a wage in these placements.

Determination of Countable Hours - Documentation provided by the employer is used to determine the hours of unsubsidized employment. This documentation is pay stubs or other employer provided statements which substantiate the number of hours worked. Phone calls may be accepted if pay stubs or other employer provided statements are unavailable. Documentation gathered for determining eligibility is also used. This information is available in online Case Notes used by eligibility staff for documentation purposes.

Once documented and verified, the actual hours worked as reported by the employer may be projected for up to 6 months if they represent continuing circumstances. This is done by averaging the reported hours for each week and counting this number of hours weekly for up to 6 months. If the actual hours worked in the initial month do not represent continuing circumstances, actual hours worked each month as verified by the employer are used. New documentation is required for the seventh month and following any reported change in hours of employment.

For hours of self-employment, information gathered for determining eligibility is used. This information is available in online Case Notes used by eligibility staff for documentation purposes. The self-employed individual must provide documentation necessary to verify their gross income and the allowable costs of doing business for calculation of adjusted gross income. The adjusted gross income is divided by the federal minimum wage to estimate actual hours. Once the hours of self-employment have been calculated and verified, the estimated hours may be projected for up to 6 months if they represent continuing circumstances. This is done by averaging the reported hours for each week and counting this number of hours weekly for up to 6 months. If the estimated hours of self-employment do not represent continuing circumstances, a new estimate of actual hours must be calculated and verified. New documentation is required for the seventh month and following any reported change in self-employment income.

In some situations the income from self-employment is irregular, subject to fluctuation, or, due to the nature of the self-employment enterprise (e.g., commercial fishing), may not be received in full in the month the work was done. In these cases, the adjusted gross income will be divided by the federal minimum wage and applied to the period of self-employment.

For example: A participant is a self-employed commercial fisher. The season lasts 5 months. The eligibility technician, following allowable eligibility rules to determine

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income from self-employment, uses prior year income tax records and other information about the expected level of fishing activities to calculate an adjusted gross countable income of \$5,000 for the season or \$1,000 per month. The projected monthly income is divided by the federal minimum wage to arrive at the projected hours of activity for each month of the fishing season.

Verification of Countable Hours - Documentation provided by the employer to determine the hours of unsubsidized employment is also used for verification purposes. New verification is required every 6 months and following any reported change in hours of employment. Employer provided statements, including documented telephone contacts, will include the participant's name, actual hours of work, name of the employer, and the name and phone number of the person verifying hours. The caseworker will document the information obtained from the employer in the case file.

Self-employment – When self-employment income is received on a regular basis, the verification of the hours of self-employment is determined by dividing the participant's adjusted gross earned income by the federal minimum wage. The information for determining adjusted gross earned income is verified through the eligibility determination process which follows strict program requirements for the determination and verification of self-employment income. The case manager will follow the policy and process the ET would use to make this determination in order to count hours of work participation. This process provides a degree of accuracy sufficient to determine eligibility for program benefits and it is considered adequate to calculate the hours of participation in self-employment activities. The information used to calculate the hours of participation is documented in the case file.

Monitoring/Supervision Procedures - Daily supervision is the responsibility of the employer. Hours of participation in self-employment are based on information gathered to calculate earnings for purposes of eligibility determination.

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Subsidized Employment

Definition - Subsidized employment is employment in the private or public sector for which the employer receives a subsidy from TANF or other public funds to offset some or all of the wages and costs of employing a recipient. The two types of subsidized employment countable in Alaska are:

- Work study programs where students are employed by and receive wages from a public or private educational institution.
- Job Start, the subsidized employment program operated by the State of Alaska, Division of Public Assistance. This program uses the amount of a TANF recipient's benefit to offset a portion of their wages. The Job Start program requires that participants in subsidized jobs are provided a minimum of 35 hours of work per week. Job Start positions typically last from three to six months. The position cannot last more than 12 months. Employers participating in the Job Start program are required to complete an initial work site agreement that stipulates the hours the client will be employed. Supervisors are requested to immediately report attendance failures.

Determination of Countable Hours - Documentation provided by the employer is used to determine the hours of subsidized employment. This documentation is pay stubs or other employer provided statements which substantiate the number of hours worked. Phone calls may be accepted if pay stubs or other employer provided statements are unavailable. Documentation gathered for determining eligibility is also used. This information is available in online Case Notes used by eligibility staff for documentation purposes.

Once documented and verified, the actual hours worked as reported by the employer may be projected for up to 6 months if they represent continuing circumstances. This is done by averaging the reported hours for each week and counting this number of hours weekly for up to 6 months. If the actual hours worked in the initial month do not represent continuing circumstances, actual hours worked each month as verified by the employer are used. New documentation is required for the seventh month and following any reported change in hours of employment.

Verification of Countable - Documentation provided by the employer to determine the hours of subsidized employment is also used for verification purposes. New verification is required every 6 months and following any reported change in hours of employment. Employer provided statements, including documented telephone contacts, will include the participant's name, actual hours of work, name of the employer, and the name and phone number of the person verifying hours. The caseworker will document the information obtained from the employer in the case file.

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On the Job Training (OJT)

Definition - OJT is training in public or private sector employment that is given to a paid employee while the person is engaged in productive work and where the individual gains knowledge, skills and abilities essential to the full and adequate performance of the job. The Alaska Division of Public Assistance OJT program reimburses participating employers in an amount equal to 50% of the participating employee's wages for the costs of training the OJT participant. The wages the participant receives in the OJT position are used to calculate Temporary Assistance eligibility and benefits.

Employers participating in this OJT program are required to work with the client and case manager to develop an individualized training plan for the client. The plan is designed to provide the participant with the knowledge, skills and abilities essential for a specific job and prepare the client to become a permanent employee following the training. OJT agreements completed by the employer require that participants in a full-time OJT position be provided a minimum of 35 hours of work per week and that part-time OJT positions provide a minimum of 20 hours of work per week. Participants may be assigned to an OJT placement for 3 to 6 months. The length of the placement may be adjusted to meet the needs of the employer and client. The OJT placement may not last longer than 12 months.

Determination of Countable Hours - Documentation provided by the employer is used to determine the hours of OJT. This documentation is pay stubs or other employer provided statements which substantiate the number of hours worked. Phone calls may be accepted if pay stubs or other employer provided statements are unavailable. Documentation gathered for determining eligibility is also used. This information is available in online Case Notes used by eligibility staff for documentation purposes.

Once documented and verified, the actual hours worked as reported by the employer may be projected for up to 6 months if they represent continuing circumstances. This is done by averaging the reported hours for each week and counting this number of hours weekly for up to 6 months. If the actual hours worked in the initial month do not represent continuing circumstances, actual hours worked each month as verified by the employer are used. New documentation is required for the seventh month and following any reported change in hours of employment.

Verification of Countable Hours - Documentation provided by the employer to determine the hours of OJT is also used for verification purposes. New verification is required every 6 months and following any reported change in hours of employment. Employer provided statements, including documented telephone contacts, will include the participant's name, actual hours of work, name of the employer, and the name and phone number of the person verifying hours. The caseworker will document the information obtained from the employer in the case file.

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Work Search and Job Readiness

Definition - *Work search* includes participation in Job Clubs or similar activities designed to orient participants to work search expectations and to provide support and guidance for job seekers. Individuals engaged in work search are required to register for work with the state's Department of Labor and to participate in employability assessments. These are vocational assessments and/or screening for learning needs/disabilities, mental health, substance abuse, or domestic violence. Work search entails researching employment opportunities, preparation and submittal of applications, attending interviews and interview follow-up with prospective employers. Case managers may assign a specific number of direct contacts with employers based on the local job market and the work experience, skills, and abilities of the participant.

Job readiness activities include workshops and training in life skills, basic workplace expectations, skills, and ethics, resume writing, job retention and advancement skills, and vocational counseling.

Job readiness activities can include short-term substance abuse and/or mental health treatment, domestic violence counseling or rehabilitation activities. Clients selected for screening because of demonstrated challenges to self-sufficiency, and those who disclose issues, may be referred to a state approved service provider for assessment. The assessment may result in referral to a state approved treatment provider when warranted by the severity of the client's condition and the condition's impact on the person's employability.

Specific activities that are essential for an individual to prepare for self-employment are also considered job readiness activities. These activities are necessary for the participant to obtain employment. Activities for self-employment job readiness include development of a business plan, acquisition of necessary business licenses, certifications (e.g., health certificates for food preparation), and permits (e.g., commercial fishery or mining permits), consultation with the Small Business Administration (SBA), pursuit of loans through financial institutions or funding through grants or micro-enterprise options, and obtaining supplies, equipment and business property.

Determination of Countable Hours - Expectations for participation in work search and job readiness are initially documented as part of the participant's Family Self-Sufficiency Plan.

Work Search - Actual countable hours are determined by sign-in sheets at regularly scheduled Job Club sessions and workshops. Work search participants are required to research employment opportunities and prepare applications, resumes, etc., at job center resource rooms or at resource rooms operated by Work Services providers. When clients have multiple interviews and are applying with multiple employers on the same day, the travel time in between interviews and applications can be counted. Travel to the first

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interview or potential employer, lunch breaks, and travel home from the final interview or potential employer, are not counted.

Clients are required to pursue a specific number of appropriate job leads each day as part of the work search activities. The actual number of leads is driven by the local job market and the client's employability assessment. Clients are required to maintain job search logs that provide case managers with information regarding each employer contact (e.g., employer name and contact information, and the start and end times for each interview).

Job Readiness - Clients participating in job readiness workshops sign attendance sheets that document their participation. Hours of participation in job readiness workshops and training are based on the scheduled hours for these activities as set by the service provider delivering the training.

Clients who the case manager determines have a specific barrier to employment, or who persistently demonstrate an inability to meet self-sufficiency objectives and milestones necessary to prepare for employment, may be referred for screening and/or assessment to an approved provider (e.g., licensed by the state to provide the service). When documentation from the provider is obtained showing that treatment is necessary, treatment hours are countable. Hours of participation will include hours in family assessment and evaluation; individual, group, and family therapy; and mental health/substance abuse case management.

Job Readiness for Self-employment - Individuals are required to maintain a log of activities related to preparation for self-employment. The log will note actual time on tasks and provide contact information for individuals or organizations (e.g., financial institutions, licensing, SBA, etc.) the participant is working with to initiate the self-employment activities.

Verification of Countable Hours - Work Search: Attendance records maintained by Job Club session facilitators serve to verify participation in the activity. Job Search activities are verified through review of the job search log and interactive de-briefing sessions with the participant's case manager. The case manager will make random checks of reported employer contacts if the information appears questionable. Case managers document this information in the case file along with the actual time necessary to de-brief clients on job search experience and provide coaching and additional job leads.

Job Readiness: These activities are verified through review of the participant's activity log and interactive de-briefing sessions with the participant's case manager. The case manager will make random checks of reported contacts if the information appears questionable. Case managers document this information in the case file as well as the actual time spent with the client reviewing progress on job readiness activities. Case managers who assign job readiness workshops to clients verify the hours of participant

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attendance in the workshop with the instructor or presenter. Hours of participation in treatment programs, rehabilitation services, and employability assessments are verified through documentation from the provider licensed by the state to conduct assessments and provide treatment or therapy. This information is retained in the case file.

Job readiness for Self-Employment - These activities are verified through contacts with individuals and organizations identified on the participant's activity log. Hours may also be verified by written statements from contacts verifying the participants time spent on tasks. The information obtained is documented in the case file.

Monitoring/Supervision Procedures - Participants in activities at Job Centers or other facilities operated by Work Services contractors are monitored daily by resource room staff, Job Club facilitators, and/or the case manager assigned to the participant. Clients in job readiness activities are monitored by the provider delivering the specific services.

The actual job search activities of program participants are monitored after the fact through interactive interviews/de-briefings with the case manager and monthly review of the client's weekly job search log.

Note: Case managers use a specific work activity code for work search/job readiness. Case managers enter the start and end date for the activity and the actual, verified hours of participation for the month. This information is downloaded into the database used by the division to report participation. The State's 12-week limit on reporting job search and job readiness is monitored by matching the previous 11 months federal TANF data to the current month's TANF data to check the number of weeks each adult reported any amount of job search and job readiness. For the purposes of reporting federal TANF data, a week of job search and work readiness activities is defined as 20 hours for a single custodial parent with a child under age 6, and 30 hours for all other work-eligible individuals. Once an adult has had a total of 240 hours for a single parent with a child under age 6, or 360 hours for other adults, job search and job readiness hours reported, we report zero hours of job search and job readiness in all subsequent TANF Data Reports. We do not report an adult's hours of job search and job readiness for the week directly following the 4th consecutive week where they had any amount of job search and job readiness hours reported.

The ACF website <http://www.acf.hhs.gov/programs/ofa/pi-ofa/12weekqualifier.htm> is used to check Alaska's eligibility to allow 12 weeks of job search. Information about a change in the needy state designation will not be available until 3 months after the month in which recipients were assigned to job search for more than 6 weeks. When such information is received, the month's data will be reprocessed to make the necessary adjustments and the report resubmitted.

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Business Work Experience (BWE)

Definition - Business Work Experience (BWE) is unpaid work with a private sector for profit employer that provides an individual with an opportunity to acquire the general skills, training, knowledge, and work habits necessary to obtain paid employment. The purpose of work experience is to improve the employability of those who cannot find unsubsidized employment.

BWE placements are short-term, not to exceed 3 months, and are intended to allow a client to test jobs that are related to their occupational goals. The placement also provides clients with an opportunity to develop and improve workplace ethics, to establish relevant and transferable work skills, and to develop contacts and references in the business community. Placements can be made with any business that is free from wage and hour disputes or violations. Each participating business must sign a Work Experience Site agreement.

Work Experience placements must not:

- Displace any currently employed worker, including partial displacement through a reduction in hours of overtime, wages, or benefits
- Fill any positions vacated by a layoff or a reduction in force, or a position being left vacant due to lack of funding and must not infringe on the promotional opportunities of any individual currently employed by the work site
- Prevent a laid off worker from filling a similar vacant position
- Cause the imposition of fines or penalties against a participant by a labor union

Determination of Countable Hours - The number of allowable hours for all work experience activities is calculated by dividing the TANF recipient's cash benefit by the state's minimum wage. State and/or contract case management staff solicits BWE work sites. Each site is required to complete a Work Experience Site Agreement which documents the client's scheduled hours of activity.

Verification Procedures - BWE participants have the site supervisor approve and sign an hour and attendance form. The form is submitted to the case manager every two weeks. Case managers also periodically contact the BWE site supervisor to identify and address performance issues. This information is retained in the case file.

Monitoring/Supervision Procedures - Work experience participants are monitored or supervised at the work site as if they were an employee. Site supervisors are instructed to immediately report attendance failures. Case managers, or other staff responsible for developing BWE sites, periodically contact the site for the purposes of evaluating progress.

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Community Work Experience (CWE)

Definition - Community Work Experience (CWE) participants acquire job skills, recent work experience, network with potential employers, and contribute valuable services to their communities. Participants acquire knowledge, skills, and work ethics that employers find beneficial when seeking new employees. Whenever possible the work assignment includes work duties that match the participant's vocational interests and enhance their skills and ability to find paid employment.

Only public sector organizations or registered non-profit corporations can be considered as CWE sites. Participating non-profits must sign a CWE site agreement. For consideration as an appropriate work site, the non-profit organization must have an IRS 501c.3 status. In addition, the purpose of the 501c.3 non-profit organization, as recognized by the IRS, is limited to the following six specific non-profit types:

- Religious
- Charitable
- Civic
- Cemetery
- Recreational
- Educational

Placements can also be made with federal, state, or local government agencies, including public school districts. The work site representative must certify that the site is governmental or an allowable IRS 501c.3 non-profit organization.

Note: Not all IRS 501c.3 non-profit organizations are acceptable work sites. Community Work Experience placements are limited as described above. When the non-profit status is undetermined, a corporation officer must provide a copy of the IRS 501c.3 verification.

CWE includes subsistence activities which are defined as the non-commercial, customary, and traditional harvest of wild, renewable resources for use as food, shelter, fuel, clothing, tools, crafts, or transportation, and that contribute directly to the common good of the community and achieve a useful public purpose. This is accomplished through the distribution of harvested resources throughout the community using traditional and customary social networks. Subsistence activities are considered work activities when paid employment or other community work experience placements are unavailable.

Determination of Countable Hours - The number of allowable hours for all work experience activities is calculated by dividing the TANF recipient's cash benefit by the state's minimum wage. State and/or contract case management staff solicits CWE sites. Each site is required to complete a Community Work Experience Site Agreement which documents the client's scheduled hours of activity. Hours in

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subsistence activities are determined from documentation provided by an overseeing agency or organization that includes the number of hours of participation and an explanation of how the activity directly contributed to the common good of the community and achieved a useful public purpose.

Note: Self-initiated community work experience, that is not a subsistence activity, is only allowed if and when it meets the standards the state has set for CWE sites. Specifically, it must be operated by public or private non-profit organizations or by federal, state, or local government agencies, or public school districts.

Verification of Countable Hours - CWE participants have the site supervisor approve and sign an hour and attendance form. The form is submitted to the case manager every two weeks. Case managers also periodically contact the CWE site supervisor to identify and address performance issues. For subsistence activities, the participant must provide documentation from an overseeing agency or organization that verifies their attendance and performance of subsistence tasks. The information obtained is retained in the case file.

Monitoring and Supervision Procedures - CWE participants are monitored or supervised at the work site as if they were an employee. Site supervisors are instructed to immediately report attendance failures. Case managers, or other staff responsible for developing CWE sites, periodically contact the site for the purpose of evaluating progress. Monitoring of participation in subsistence activities is done by the overseeing agency or organization providing documentation of the activity.

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Vocational Education and Training

Definition - Vocational education and training includes organized educational programs which are directly related to the preparation of individuals for employment in current or emerging occupations that require education and training necessary to ensure the success of participants. This activity may lead directly to certification or endorsement of specific skills, to an Associates of Applied Science (AAS) degree, or baccalaureate or advanced degree. Typically, this service is provided by vocational education and technical schools as well as educational institutions offering endorsements, certificates, or degrees for vocational education and training related to demand occupations. Vocational education and training may also be provided by grantees or contractors delivering curricula reviewed and approved by the state.

Occupational endorsement programs provide the specialized knowledge and skills needed in specific employment sectors. Fields of study include:

Administrative Office Support; Automotive Brakes Suspension, and Alignment; Automotive Engine Performance; Electrical Automotive Power Trains; Bookkeeping; CISCO-Certified Network Associate (CCNA); Clinical Assistant; Community Mental Health Services; Conflict Resolution; Culinary Arts Technology, Desktop Publishing and Graphics; Fitness Leadership; Legal Office Support; Medical Office Support; Office Technology; Phlebotomy; Clinical Assistant; Dietary Manager; 100 Ton Marine Transportation; Commercial Drivers License; Hazardous Materials Endorsement; Able Seaman; Real Estate.

Certificate programs offer focused instruction in a concentrated area. They are particularly useful in scientific or technical areas such as health care, computer systems, transportation or industrial technology. Certification ensures students have the knowledge and skills needed for entry-level positions in specific employment sectors. Fields of study for certificate programs include:

Applied Ethics; Architectural Drafting; Automotive Technology; Aviation Maintenance; Certified Nurse Assistant; Civil Drafting Technology; Computer and Networking Technology; Computer Information and Office Systems; Dental Assisting; Early Childhood Development; Geographic Information Systems; Heavy Duty Transportation and Equipment; Industrial Electricity; Industrial Welding Technology; Licensed Practical Nurse; Logistics; Massage Therapy; Mechanical and Electrical Drafting; Nondestructive Testing Technology; Paralegal Studies; Pharmacy Technology; Pipe Welding; Power Plant Operator; Structural Drafting; Telecommunications and Electronics Systems; National Retail Federation Foundation; Technology and Skills Training; Marine Transportation; Accounting Technician; Health Information Management Coding; Construction; Trade Technology; Personal Care Attendant; Instrumentation Technology; Allied Health; Applied Business Management; Community Health;

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Culinary Arts; Para-professional Educator; Maintenance Technology; Native Language Education; Office Management and Technology; Paralegal; Tribal Management.

Associates of Applied Science (AAS) programs offer a focused curriculum that prepares students for a position in a particular field of employment or endeavor. These types of programs provide knowledge and skills needed to carry out specific tasks and develop abilities in communications, computation and human relations that are valued by employers. Courses of study in AAS programs include:

Accounting; Air Traffic Control; Apprenticeship Technologies; Architectural and Engineering Technology; Automotive Technology; Aviation Administration; Aviation Maintenance Technology; Business Computer Information Systems; Computer Information and Office Systems; Construction Management; Culinary Arts; Dental Assisting; Dental Hygiene; Early Childhood Development; Fire & Emergency Services Technology; Geomatics; Heavy Duty Transportation and Equipment; Human Services; Logistics Operations; Medical Assistant; Medical Laboratory Technology; Nursing; Paramedical Technology; Professional Piloting; Radiologic Technology; Small Business Administration; Telecommunications; Electronics and Computer Technology; Welding and Nondestructive Testing Technology; Business Administration; Process Technology; Allied Health; Community Health; Culinary Arts; Para-professional Educator; Maintenance Technology; Native Language Education; Office Management and Technology; Paralegal; Tribal Management; Renewable Resources.

Many technical centers in Alaska recommend pursuit of a diploma through the state's general educational development (GED) examination for their students because it is often the minimal education requirement accepted by employers. When pursuit of Adult Basic Education, Adult GED classes and remedial education and instruction in Vocational English as a Second Language (VESL) is required by the technical center as part of the client's education plan, those activities provided by the educational institution are considered vocational education.

Distance delivered Vocational Education and Training is only allowed when the training program includes mechanisms for providing reports that document progress and the time the student is accessing the online training program.

Determination of Countable Hours - Vocational education programs typically have scheduled hours for class work, labs, workshops and practicum. Case managers assigning this activity confirm the course work and class schedules required by the specific program. Family Self-Sufficiency Plans are developed to reflect the hours of participation required for the specific program. Supervised hours in labs, practicum, job shadowing, and unpaid internships or externships, which are part of the regular

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curriculum are considered hours of vocational education. 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 total homework time counted for participation cannot exceed the hours of attendance required or advised by the education program. Supervised study sessions or tutoring are also considered countable hours.

Activities counted as Vocational Education may also count as Job Skills Training directly related to employment as long as the class or program is directly related to a specific job or occupation.

Verification Procedures - Participants submit to their case manager an attendance form that is completed by the instructor, tutor, study hall monitor or activity supervisor. The form is completed and submitted monthly, and is retained in the case file. Unsupervised study sessions are reported by the client and documented on a homework log kept in the case file. The case manager documents program expectation of homework with a class syllabus or by collateral contact with school or instructor. For distance delivered programs, reports that document progress and the time the student is accessing the online training program will be retained in the case file.

Notes: Case managers assign and enter a specific work activity code for Vocational Education into the Division's Case Management System (CMS). Case managers enter the start and end date for the activity and the actual, verified hours of participation for the month. This information is downloaded into the database used by the Division to report participation. The 12-month lifetime limit on reporting vocational education is monitored by matching the historical TANF Data Reports to the current TANF Data Report to check the number of months each adult reported any amount of vocational education. Once an adult has had any amount of vocational education hours reported for 12 months, we report zero hours of vocational education in all subsequent TANF Data Reports.

Supervision and Monitoring - Instructors, tutors, study hall monitors and activity supervisors provide supervision for students. Online vocational education and training programs must have features that generate reports documenting the progress of students and the time students spend accessing the program.

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Job Skills Training

Definition - Job skills training includes short-term training or education that improves the knowledge, skills, and abilities an individual needs to obtain, retain, or advance in employment or to adapt to the changing demands of the workplace. Job skills training may address skill sets required by a specific employer or those that are recognized as general skills needed to be successful in a broad range of jobs or occupations. Basic Education and ESL may count as Job Skills training. Activities which can be counted as Vocational Education also may be counted as Job Skills Training when the case manager determines that the training is directly linked to emerging or demand occupations

Determination of Countable Hours - Job Skills training programs, workshops and seminars have scheduled hours of operation. Case managers assigning this activity confirm the class schedules required by the specific job skills training program. Family Self-Sufficiency Plans are developed to reflect the hours of participation required for the specific program. Distance delivered Job Skills Training is only allowed when the training program includes mechanisms for providing reports that document progress and the time the student is accessing the online training program. Actual hours of classroom instruction as well as lab work, unpaid intern or externships, supervised study sessions and other supervised secondary activities assigned as part of the job skills training program are considered countable. 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 total homework time counted for participation cannot exceed the hours of attendance required or advised by the education program.

Verification Procedures – Unsupervised study sessions are reported by the client and documented on a homework log kept in the case file. The case manager documents program expectation of homework with a class syllabus or by collateral contact with school or instructor. Participants submit to their case manager an attendance form that is completed by the instructor, study hall monitor or activity supervisor.

Supervision and Monitoring - Training instructors, study hall monitors and activity supervisors are responsible for the daily supervision of client's participating in the training program.

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Education Directly Related to Employment

Definition - This activity encompasses education and instruction necessary to ensure participants can successfully pursue and gain employment and successfully retain jobs and advance in the workforce. It includes Adult Basic Education instruction in the basic skills of reading, writing, and mathematics necessary for a participant to be a productive employee, English as a Second Language, and Workplace Literacy.

Determination of Countable Hours - Countable hours of participation are determined based on the curriculum and course schedules of the assigned activity. Countable hours include those spent in the class room, in testing, and in supervised study sessions or with tutors. 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 total homework time counted for participation cannot exceed the hours of attendance required or advised by the education program. This activity is often assigned concurrent with other activities and the Family Self-Sufficiency plan is used to set expected hours of participation. However, only those hours of participation that are verified are counted. Distance delivered Education is only allowed when the training program includes mechanisms for providing reports that document progress and the time the student is accessing the online training program. Basic Education and ESL can count as education directly related to employment.

Verification Procedures - Participants submit to their case manager an attendance form that is completed by the instructor, tutor, study hall monitor or activity supervisor. The form is completed and submitted monthly, and is retained in the case file. Unsupervised study sessions are reported by the client and documented on a homework log kept in the case file. The case manager documents program expectation of homework with a class syllabus or by collateral contact with school or instructor. For distance delivered programs, reports that document progress and the time the student is accessing the online training program will be retained in the case file.

Supervision and Monitoring - Instructors, tutors, study hall monitors and activity supervisors provide supervision for participation in this activity.

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Attendance at Secondary School

Definition - This activity is primarily assigned to minor parents who have not completed high school or a course of study leading to a diploma through the state's general educational development (GED) examination. The Division defines a minor parent as an individual under the age of 18 years old who is neither married nor emancipated.

Minor parents must maintain an adequate level of school attendance in a secondary school or other appropriate training program unless the minor parent:

- Has a high school diploma or a GED;
- Has a dependent child under 13 weeks of age; or
- Can show good cause for not attending school.

A minor parent is considered to be maintaining an adequate level of school attendance when:

- The individual is enrolled in and regularly attending a secondary school or appropriate training program; and
- Attendance, as verified by an official of that school or program, is adequate to meet graduation or program certification requirements.

Adult welfare recipients who have not received a high school diploma or its equivalent, may also be assigned this activity if it includes regular attendance in a course of study provided by an approved education program that leads to a general educational development (GED) examination diploma. Distance delivered Education is only allowed when the training program includes mechanisms for providing reports that document progress and the time the student is accessing the online training program.

Determination of Countable Hours - Proctored testing and examinations, monitored study time, including documented time with tutors, are included as part of this activity. 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 total homework time counted for participation cannot exceed the hours of attendance required or advised by the education program. Adult Basic Education and English as a Second Language (ESL) instruction is included as part of this activity if required as a prerequisite.

Verification Procedures - Participants submit to their case manager an attendance form that is completed by the instructor, tutor, study hall monitor, or activity supervisor. The form is completed and submitted monthly, and is retained in the case file. Unsupervised study sessions are reported by the client and documented on a

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Section I – Countable Work Activities

homework log kept in the case file. The case manager documents program expectation of homework with a class syllabus or by collateral contact with school or instructor. For distance delivered programs, reports that document progress and the time the student is accessing the online training program will be retained in the case file.

Supervision and Monitoring - Instructors, tutors, study hall monitors or activity supervisors provide supervision for participation in this activity.

Note: Case managers will verify successful completion of the course with a report from the education or training provider at the end of the scheduled performance period.

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Section II – Hours Engaged in Work

Excused Absences - Participants in the Alaska Temporary Assistance Program are expected to participate in assigned activities for 40 hours per week. However, participants in unpaid work activities often have appointments, meetings, or family emergencies that may conflict with scheduled activities.

To address this issue, federal regulations allow up to 80 hours of excused absence per 12 months (limited to 16 hours per month) in addition to observed state and federal holidays. The number of excused absence hours are monitored by matching the previous 11 months federal TANF data to the current month's TANF data to check the number hours reported. Both days of excused absences and holidays only apply to hours the individual was scheduled to participate in unpaid activities. Clients participating in Business or Community Work Experience activities must have absences approved by the work experience site supervisor. For clients in other unpaid work activities, an absence is only "excused" if approved by the case manager. Hours of excused absence and holiday hours will be tracked electronically.

State and federal holidays allowed under this plan are:

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

Note: If the holiday falls on a **Sunday**, the holiday is observed the following **Monday**. If the holiday falls on a **Saturday**, the holiday is observed the preceding **Friday**.

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Section III – Work-Eligible Individual

Identification of Work-Eligible Individuals - With the exceptions noted below, all adult recipients of assistance and any non-recipient parents living with a dependent child receiving assistance are considered work-eligible individuals. The following are not considered work-eligible individuals:

- Minor parents who are neither the head of household nor the spouse of the head of household;
- Aliens ineligible to receive assistance due to their immigration status;
- Parents caring for a disabled family member who lives in the home
- Step-parents who do not receive assistance and are not the parent of any child who is receiving assistance;
- Parents who receive Supplemental Security Income (SSI), Social Security Disability Insurance (SSDI), or Alaska's SSI state supplement program (Adult Public Assistance), and;
- Non-needy caretaker relatives who do not receive assistance and are not the parent of any child who is receiving assistance.

The work eligibility status of individuals is determined and appropriate verification is obtained during the eligibility determination process. The individual's status is documented in the Case Notes used by eligibility staff.

Identification of parents caring for disabled family members – A specific work exemption code is used in EIS to identify adult household members who are exempt from participation in work activities because they are the caretaker of a disabled adult or child family member. This code is captured in the data download and transferred to the data report submitted to meet federal reporting requirements in order to identify these parents who are excluded from the definition of work-eligible individuals.

Definitions

Disability - The family member must have either a physical or mental condition that impairs their functions and is verified by a written statement from a physician or psychiatrist, or by other relevant documentation such as receipt of Social Security disability benefits, Supplemental Security Income, or a Home and Community Based Care Waiver. The disability must, in the written opinion of a physician or other licensed health care professional, require a level of care that impedes the adult caretaker's ability to participate in work activities or to accept or retain employment at a level that allows the family to be self-sufficient.

Family Member - A family member is defined as any individual residing in the home that is related to the caretaker parent by blood, marriage, or adoption.

Full-time student - A full-time student is enrolled in and regularly attending:

- A vocational training that is designed to prepare a student for gainful employment, including participation in the Job Corps program, for at least 30 hours a week if the

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Section III – Work-Eligible Individual

program involves shop practices or at least 25 hours a week if the program does not involve shop practices;

- A college or university for at least 12 semester or quarter credit hours a semester or quarter;
- A high school for at least 25 hours a week, or if in a high school cooperative or apprenticeship training program, full-time as defined by that program; or
- An accredited correspondence course for at least 25 hours a week.

Data Entry - Based on Alaska Temporary Assistance Program policy, eligibility technicians determine eligibility for each household member and input codes into the Eligibility Information System (EIS) that identifies their participation and work requirement status. Case managers enter work activity codes, start and end dates, and actual hours of participation for each work-eligible adult into the automated Case Management System (CMS) which interfaces with EIS. The data elements entered by eligibility and case management staff are downloaded into the Division's data processing program and cross tabulated to identify work-eligible individuals. The application is programmed to translate codes used in EIS to the applicable codes used by TANF Data Report.

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Section IV – Internal Controls

Data used to calculate work participation rates is entered into the Division of Public Assistance's automated systems by Eligibility Technicians, who are state employees, and by Work Services case managers and employment specialists who may be state employees or contract staff. All staff responsible for data entry participate in a spectrum of formal quality assessment and assurance procedures and processes designed to ensure accurate data entry.

The Division of Public Assistance Program Integrity and Analysis Section is responsible for conducting quality assessments necessary to evaluate payment accuracy for all of the Division's programs and to ensure the effective administration and management of work activity requirements for the Alaska Temporary Assistance Program (ATAP). The nature of the information gathered depends on the specific program's performance requirements. Reviewers conduct full case reviews (both hard copy document and electronic records), participate in client home visits or telephone interviews, research partner agency databases, and carry out independent collateral contacts and other pertinent aspects of the work. Quality Assurance Reviewers review a sample of cases from programs for all offices in a quantity that assures the integrity of accuracy rate figures and office performance measures. For the Alaska Temporary Assistance Program, approximately 270 cases are reviewed a year.

The quality assurance process includes a feedback mechanism that enables line staff to review and address cases found in error. A Quality Assessment Review Committee comprised of staff from the Division's Policy and Program Development Team, Program Integrity and Analysis, and Field Operations, review the product of the QA review process to identify and address performance trends.

In addition to the statewide quality assessment review process, each office conducts regular supervisory reviews of cases to ensure the accuracy of eligibility determinations and adherence to administrative procedures and policies. The number and types of cases reviewed is determined by the specific error trends that have been identified in the office. The annual single state audit process is a further check to ensure the accuracy of data that is relevant to the calculation of work participation rates.

State and contract case managers are responsible for entering work activity data into the Division's automated Case Management System (CMS). A formal and rigorous process is in place to ensure the integrity and accuracy of data entered by Work Services case managers.

Each entity responsible for the delivery of work services to ATAP participants is required to document and maintain all client information, case/client notes, Family Self-Sufficiency Plans, and work participation data in the DPA Case Management System (CMS) with hard copy verification and signed Family Self-Sufficiency Plans maintained in a case file. The service provider is required to ensure that client/case documentation in the DPA Case Management System (CMS) adequately describes and supports the:

- Family circumstances that impact work services;
- Work activity data entered into CMS;

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- Goals and activities in the Family Self-Sufficiency Plan;
- Supportive service requests and expenditures;
- Effective transfer of the client to a different case manager to ensure a continuum of services to the family.

Service providers are required to have in place an Administrative Procedures Manual that includes the policies and procedures for a quality assurance process, including supervisory case reviews, used to monitor and assess the accuracy and timeliness of data entered by case managers. System-related issues and problems affecting the accurate and timely entry of data into CMS are reported to the Division within 24 hours. At a minimum the report identifies the date and time of the problem, case or client specific information necessary to isolate the problem and a brief description of the problem including the action being taken at the time the problem occurred.

Service providers cooperate with the Division in site visits and continuous improvement reviews used to monitor operations and evaluate performance. Staff from DPA Program Integrity and Analysis, and when appropriate representatives from Field Services and Policy and Program Development, conduct annual reviews and provide technical assistance that serves to ensure the accuracy of data entered in CMS. Reviews include the following elements:

1. Case reviews (hard copy and electronic files) of a representative sample of the cases managed by the service provider. The case review process serves to confirm that documentation supports work activity data entered in CMS by case managers.
2. Interviews with case managers to assess individual awareness and expertise in documentation and data entry procedures and processes. Case managers are also queried on internal quality assurance procedures including supervisory case reviews.
3. Interviews with clients, targeting those clients whose cases were reviewed, to validate case documentation and work activity data entry.
4. On-site observation of provider operations including job clubs, workshops, resource rooms, etc.
5. Interviews with supervisory and management staff covering a range of topics including the agency's procedures for ensuring the accuracy of case documentation and data entry.

The service provider is required to respond to the Division's report of findings from the review. The response to the site review report must address any deficiencies and describe corrective action strategies.

In addition to the review process, the Division provides numerous reports and statistical data to the service providers to support a self-monitoring process.

- Weekly and monthly Work Services caseload reports provide detailed information about each Work Services participant for each case manager (e.g., current work activity, actual hours of participation, duration of activity, penalty status, family type).
- Universal Participation Statistics reports provide data at the region, office, unit, and caseload level.

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- Performance by Case Manager Report provides supervisors with performance data for each case manager.
- Participation Reports identify each program participant's status as a mandatory or disregarded participant, the hours in a countable work activity, and the total countable hours for the month for each case manager
- Monthly Inconsistency and Discrepancy reports identify any case data irregularities that appear error prone. Service Providers have 15 working days from the date the report is received to provide a written response identifying corrective actions. This report is used to control a range of data entry errors.

The Division also has a process by which service providers can request a review of the data compiled for the calculation of participation rates and performance outcomes. This check and balance allows contractors to contest how data entered by staff is reflected in performance metrics. It requires the provider to carefully research and document what they believe to be computational and compilation errors that affect how their performance is represented. DPA Program Integrity staff reviews and validates the service providers' research and makes adjustments as necessary.

The annual single state audit process is a further check to ensure the accuracy of data entered by case managers. The audit verifies that case documentation and data entry is consistent with data transmitted for use in calculating federally-mandated participation rates.

Note: Service providers include contractors who deliver direct welfare to work services to Alaska Temporary Assistance families and Alaska Department of Labor and Workforce Development employees who provide a range of welfare to work services through a reimbursable services agreement between the Department of Labor and Workforce Development, and the Department of Health and Social Services.

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Section V – Verification of Other Data Used to Calculate Participation Rates

The Division relies on a range of reports and monitoring methods, mentioned in the previous section, that serve to ensure the accuracy of all data used in the calculation of work participation rates. The Division's Eligibility Information System (EIS), which both determines eligibility and distributes benefits for several means tested programs, and the Jobs Automated Payments System (JAS), which authorizes and pays for child care, have been in use by the Division for over 20 years and were subject to rigorous testing and validation criteria during initial development and implementation and with every subsequent system enhancement.

To compile the data necessary to submit the TANF Data Report, an EIS data processing program gathers and downloads a text file for the report month approximately 15 days from the end of the report month. Initial programming of this system (January 1998) included rigorous testing to ensure accuracy. State auditors have validated the information from this data processing program every year since. Further tests of accuracy come from daily use of this data set to perform analyses and answer programmatic queries. Research Analysts crosswalk and format Alaska's data processing codes to the TANF Data Report codes using SPSS statistical software. The program was also rigorously tested to validate that neither the data processing program nor the processing of the TANF Data Report alters the data entered by line staff. State auditors have also validated the information from this data processing program every year since FFY98.

Eligibility line staff are responsible for entering data necessary to determine eligibility and benefit amounts into EIS for each household applying for assistance. Case managers input a specific code for each work activity and enter the actual hours of participation in the activities into the Division's Case Management System (CMS). CMS is an automated data processing system which is a graphical user interface to the Eligibility Information System.

The following data elements are not applicable to Alaska so the crosswalk program automatically inserts the appropriate code for every case:

Stratum - Alaska reports its entire TANF universe.

Disposition - Alaska reports its entire TANF universe.

Non-custodial Parent Indicator - Alaska does not designate non-custodial parents as members of families receiving TANF assistance.

The following are the validation procedures for the remaining data elements:

- Reporting Month - The EIS data processing program inserts the benefit authorization month in the monthly text file for each TANF case.
- Case number - Case numbers come directly from EIS and are the basis for the family's data in the monthly text file.
- Type of Family for Work Participation - During the TANF Data Report processing, we count the number of work-eligible adults designated as members of families receiving assistance and assign the proper code.

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- Amount of Food Stamps Assistance - Since EIS also processes Food Stamp benefits, the EIS data processing program has access to the Food Stamp benefit amount. It calculates a TANF family's amount of food stamps by prorating the amount of food stamps received by TA family members. The household's amount of food stamps is divided by the number of food stamp household members then multiplied by the number of TA assistance unit members.
- Receives Subsidized Child Care - The JAS Payments system within EIS authorizes and pays for TANF recipient child care. The EIS data processing program reports the amount of child care paid for each child for the reporting month.
- Amount of TANF Assistance - EIS calculates the amount of monthly TANF assistance for each eligible family. The TANF benefits provided to each family are included in the monthly text file.
- Family affiliation codes - EIS contains codes that identify members of the family receiving TANF and codes that exclude individuals from the family receiving TANF. These codes are included in the monthly text file and are used in the crosswalk program to compile the TANF Data Report.
Dates of birth (Adult) - EIS contains a field for date of birth and includes it for every household member in the monthly text file.
- Relationship to Head of Household - EIS includes this as a condition of eligibility and the relationship codes are included in the monthly text file produced by EIS.
- Parent with Minor Child - EIS includes this as a condition of eligibility and the codes are included in the monthly text file produced by EIS. During the TANF Data Report processing, the program checks the relationship and records the appropriate code.
- Work-Eligible Individual Indicator - EIS contains codes that indicate whether or not the adult family member is receiving TANF and/or SSI or SSDI, caring for a disabled family member, or is ineligible due to their immigration status. These codes are included in the monthly text file. The rest of the codes are not applicable to Alaska.

Work Participation Status

A work exemption code for a single custodial parent with a child under the age of one year is entered and the months that this exemption is in place are automatically tracked in EIS. This counter is used to ensure that single custodial parents do not receive the exemption codes in EIS for more than 12 months per lifetime and are therefore not disregarded from participation rate calculations for more than 12 months per lifetime.

Work-eligible participants are individuals who are sanctioned for non-compliance with work requirements and are identified by the entry of penalty codes in EIS. A subroutine in the data processing program tracks the number of months the penalty has been in place to ensure these participants are only excluded from the participation rate calculations for 3 months in any period of 12 consecutive months.

Single custodial parents or caretaker relatives with a child under six are identified by the birth dates entered for dependent children in EIS. This information is used in a data processing

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subroutine to identify single custodial parents or caretaker relatives with a child under age six. This process only allows those single custodial parents or caretaker relatives with a child under age six to be deemed engaged in work based on 20 hours of participation in countable work activities.