



**Department of Workforce Services
Work Verification Plan
March 17, 2014**

Overview

The Department of Workforce Services' (DWS) verification plan was prepared in accordance with the regulatory requirements of the final rule that the U.S. Department of Health and Human Service (HHS) published on February 5, 2008. Under the rule, a State must submit its Work Verification Plan to HHS for approval. The plan is organized into five sections: countable work activities, hours engaged in work, work-eligible individuals, internal controls, and verification of other data used in calculating the work participation rates. This is to certify that Utah's Work Verification Plan submitted on March 17, 2014 includes all the information required by the regulations at 45 CFR 261.62 and accurately reflects the provisions under which the State will be operating as of April 1, 2014.

The Family Employment Program (FEP) provides financial assistance and employment services to all eligible parents with dependent children residing in their home. The purpose is to empower families to increase their income and become financially independent through employment, child support, and/or disability benefits. Every parent works with a case manager to develop an employment plan that outlines appropriate activities to help the parent meet the goal of financial independence. In order to remain eligible to receive financial assistance, a parent must participate in the activities outlined in the employment plan.

I. Countable Work Activities

In order to simplify verification procedures for DWS employees and customers, DWS has developed a method of reporting participation hours called a Reporting Cycle. A reporting cycle accounts for weeks that have days in one or more months. It is similar to the Job Opportunities and Basic Skills (JOBS) approach (an acceptable alternative) that places the week in whichever month the Friday falls. The method is based on twelve reporting cycles with each cycle ending on the last Saturday of a month. If there are any remaining days in the month, they are included in the next reporting cycle. Eight reporting cycles have four weeks; four reporting cycles have five weeks. A week is defined as beginning on Sunday and ending on the following Saturday. Holiday and Excused hours are included in the weekly average hours for the appropriate work activity and included in the calculation.

For each Federal work activity, the number of countable hours of participation is determined by adding the number of verified hours of participation in the reporting cycle. After the weekly hours are totaled, holiday and excused hours are applied according to the methodology outlined in Part II, Hours Engaged in Work. The weekly average number of hours for each activity is calculated. If there are no holidays or excused hours for the reporting cycle, the weekly average is determined by dividing the total number of verified hours by the number of weeks in the reporting cycle.

DWS' Employment Counselors are responsible for opening the appropriate service in Utah Workforce Systems (UWORKS) based on a negotiated employment plan. Services that comply with Federal work requirements require a planned start date and an actual start date. The planned start date is the date customers are scheduled to begin an activity on their employment plan. The actual start date is the date customers actually begin the activity. Once an actual start date is entered, the service populates on the verification pop up screen.

The verification pop up is the screen where verified hours are entered by DWS employees. The verification screen is based on reporting cycles as explained previously. The screen displays services, service start dates, expected hours, a documentation narration box, and holiday, excused and verified hour fields. Verification hour fields are designated by the week end date and are based on a weekly number of hours. The documentation field corresponds to each verification week field allowing documentation narrations to be entered explaining how hours were verified for the week. Excused absence and holiday hours are based on a daily number of hours. A popup accessed by double clicking in the week field on the verification screen will allow DWS employees to enter excused and holiday hours for each day in the week. This allows us to track the number of hours used for excused absences or holidays.

There is an easy access button attached to the documentation box, which links the user to our imaging system, Content Manager, where documents are imaged and stored electronically. DWS Employees are able to attach the documents located in Content Manager to the hours entered for each week end date for future reference. The verification pop up serves as a historical record of verified hours and corresponding documentation. Verified hours are stored in a data warehouse.

Verified hours may also be entered using a mass entry screen in UWORKS. The mass entry screen allows hours to be entered for several customers in one location. The mass entry screen contains the same information as the verification pop up.

DWS will allow community partners and customers to enter hours through an electronic verification process. Hours entered electronically populate into the UWORKS system through Electronic Documentation. Customers log into their own secure account to enter any Job Search/Job Readiness Activities. These hours are then reviewed and approved by a DWS worker before populating to the verification pop up. Community partners are also able to log into the UWORKS system using their secure login to enter, verify and approve hours electronically for any customer they are supervising. Customers can enter their hours electronically for all activities. When these hours are entered, the supervising DWS employee or community partner must login to UWORKS using their secure login and review, verify and approve the hours before they are populated into the UWORKS system for verification. Each approved supervisor attached to an employer or training provider must have their own security key activated in UWORKS before they will be able to login to the UWORKS system to enter, review and verify customer hours. These supervisors set up an individual user name and password to enter the UWORKS system by entering the company Federal Employer Identification Number (FEIN) or Unemployment Insurance Identification (UI ID) number the first time they log in to the system.

All participation hours in Federal work activities, except approved unsupervised study hours, require supervision and documentation. Supervision is defined as the process of overseeing the performance of a person or group. The person providing the supervision assumes responsibility for the monitoring of activities. Documentation is defined as the items maintained in the case file to confirm compliance with program requirements.

The following UWORKS services and definitions comply with the Federal work activity definitions contained in the final rule. Some definitions may appear similar but vary slightly to accommodate customers who are enrolled in other Federal programs, such as the Workforce Investment Act (WIA).

Unsubsidized Employment

Describe the services under this work activity.

Apprenticeship Employment – The paid employment component of an apprenticeship that leads to skilled labor for customers who want to learn a trade. The activity must meet criteria established by the Office of Apprenticeship (OA).

Apprenticeship employment is a program that DWS partners with the Office of Apprenticeship to provide training to the employee, from the employer with related technical training in a highly skilled occupation. The primary difference between an Apprenticeship and an On the Job Training (OJT) through DWS is who funds the service. In the event of an apprenticeship the employer pays 100% of the apprentice's salary and DWS may provide training funds for the required classroom instruction. With an OJT DWS pays for the cost of training the OJT employee based on fifty percent of the employee wage rate.

The Office of Apprenticeship has established the eligibility criteria for the Apprenticeship Program. The eligible age is no less than 16 and 18 for hazardous occupations. Customers ages 16-18 must also be working towards a GED or HS Diploma if they do not already have one. The rest of the eligibility requirements are determined within the individual company and sponsors i.e. education level, school grades, interviews, previous work experience, etc.

Employment – Full or part-time employment in the public or private sector that pays wages or a salary and is not subsidized by any public program, including TANF.

Self Employment – Activities in which individuals earn income directly from his/her own business, trade or profession, rather than wages or salary from an employer. Participation hours equal total gross income minus business expenses divided by the Federal minimum wage.

Youth Employment – Full or part-time employment in the public or private sector that pays wages or a salary and is not subsidized by any public program, including TANF. Customers must be enrolled in WIA. These customers are work-eligible parents, or caretaker relatives of a minor child, receiving TANF assistance. They are also eligible for WIA because they were between the ages of 14 and 21 at the time of WIA eligibility.

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

The number of countable hours of participation is determined by adding the number of verified hours worked in paid employment activities in a reporting cycle.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.

DWS employees enter verified participation hours on the verification screen in UWORKS. Supporting documentation is maintained in the electronic case file. Acceptable documentation includes: check-stubs, timesheets, payroll records, letters or email from community partners, electronic documentation, collateral contacts to employers, TALX(The Work Number), and attendance forms provided by DWS. If a collateral contact is used to document participation hours, a collateral contact form must be filled out on paper or electronically by a DWS employee or contractor and maintained in the electronic case file.

For self-employment, describe how the State counts and verifies the hours of participation. A State may not count more hours toward the participation rate for a self-employed individual than the individual's self-employment income (gross income less business expenses) divided by the Federal minimum wage. The State may also describe an alternative methodology to count and verify hours a client is engaged in self-employment.

Participation hours equal total gross income minus business expenses divided by the Federal minimum wage. Documentation of gross income and business expenses includes tax statements, invoices, receipts, or other information recorded in our eligibility system. Employment Counselors will use the net income amount calculated by eligibility staff to determine participation hours.

If the State intends to project forward hours of participation based on current, documented, actual hours, explain how it will make this projection.

Included clarification on how self-employment hours are determined.

DWS employees will collect documentation for two weeks of paid employment hours and enter those hours on the UWORKS baseline popup on the verification screen. The baseline popup has two different fields, week 1 and week 2. The Employment Counselor enters weekly hours in each of the fields. If documentation received includes hours for more than two weeks, the Employment Counselor will average the hours to determine a weekly amount to enter on the baseline popup. This is done by dividing the hours by the time period represented in the documentation. If the check stubs do not match the UWORKS reporting weeks, but represents two full weeks in the same reporting cycle, the Employment Counselor will divide the hours represented on the check stub to represent week 1 and week 2.

Once this information is entered, UWORKS will average the hours and project the average number of weekly hours forward for a period of six months. When DWS becomes aware of a change that is representative of continuing circumstances, new documentation will be collected and hours re-projected based on the most current information.

If employment hours are not consistent, DWS employees may elect not to use the projection process. In that case, DWS employees will enter weekly hours in the weekly hours field on the verification screen.

The UWORKS verification screen will also project Self-Employment hours. Net income is determined in our eligibility system by taking thereported monthly gross income minus monthly expenses... UWORKS calculates themonthly hours by dividing the net income by the federal minimum wage. UWORKS will project six months of hours based on the formula. When DWS becomes aware of a change to net income, the counselor will enter the new net income and UWORKS will re-project the hours based on the most current information using the above formula.

Subsidized Employment Private Sector

Describe the services under this work activity.

Subsidized Employment – Private – Employment 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 customer. Some of those costs include benefits, employment-related taxes, insurance etc. Customers are paid wages and receive the same benefits as other employees who perform similar work. Subsidized employment is different from OJT in two ways. First, Subsidized Employment is for customers who may not be job ready and need necessary training, guidance and direction to adequately perform in a workplace, rather than those who need significant on-site training and guidance in a specific career or occupation. Second, the subsidy the employer receives is to offset the costs of employing the customer, rather than the cost of training.

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

The number of countable hours of participation is determined by adding the number of verified hours worked in subsidized private employment activities in a reporting cycle.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.

DWS employees enter verified participation hours on the verification screen in UWORKS. Supporting documentation is maintained in the electronic case file. Acceptable documentation includes: check-stubs, timesheets, payroll records, letters or email from community partners, electronic documentation, collateral contacts to employers, TALX, and attendance forms provided by DWS. If a collateral contact is used to document participation hours, a collateral contact form must be filled out on paper or electronically by a DWS employee or contractor and maintained in the electronic case file.

If the State intends to project forward hours of participation based on current, documented, actual hours, explain how it will make this projection.

DWS employees will collect documentation for two weeks of paid employment hours and enter those hours on the UWORKS baseline popup on the verification screen. The baseline popup has two different fields, week 1 and week 2. The Employment Counselor enters weekly hours in each of the fields. If documentation received includes hours for more than two weeks, the Employment Counselor will average the hours to determine a weekly amount to enter on the baseline popup. This is done by dividing the hours by the time period represented in the documentation. If the check stubs do not match the UWORKS reporting weeks, but represents two full weeks in the same, reporting cycle the Employment Counselor will divide the hours represented on the check stub to represent week 1 and week 2. Once this information is entered, UWORKS will average the hours and project that average number forward for a period of six months. When DWS becomes aware of a change that is representative of continuing circumstances, new documentation will be collected and hours re-projected based on the most current information.

If hours are not consistent, DWS employees may elect not to use the projection process. In that case, DWS employees will enter weekly hours in the weekly hours field on the verification screen.

Subsidized Employment – Public

Describe the services under this work activity.

Subsidized Employment – Public Sector – Employment 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 customers. Some of those costs include benefits, employment-related taxes, insurance etc. Customers are paid wages and receive the same benefits as other employees who perform similar work.

Subsidized employment is different from OJT in two ways. First, Subsidized Employment is for customers who may not be job ready and need necessary training, guidance and direction to adequately perform in the workplace, rather than those who need significant on-site training and guidance in a career or occupation. Second, the subsidy the employer receives is to offset the costs of employing the customer, rather than the cost of training.

Work Study – Paid employment for undergraduates and graduate students with financial need. Work Study placements are sites developed, coordinated, or contracted out by educational institutions where students who qualify are placed to work to help finance the costs of postsecondary education. Hourly wages must not be less than the federal minimum wage.

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

The number of countable hours of participation is determined by adding the number of verified hours worked in subsidized public employment activities in a reporting cycle.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.

DWS employees enter verified participation hours on the verification screen in UWORKS. Supporting documentation is maintained in the electronic case file. Acceptable documentation includes: check-stubs, timesheets, payroll records, letters or email from employers, electronic documentation, collateral contacts to employers, TALX, and attendance forms provided by DWS. If a collateral contact is used to document participation hours, a collateral contact form must be filled out on paper or electronically by a DWS employee or contractor and maintained in the electronic case file.

If the State intends to project forward hours of participation based on current, documented, actual hours, explain how it will make this projection.

DWS employees will collect documentation for two weeks of paid employment hours and enter those hours on the UWORKS baseline popup on the verification screen. The baseline popup has two different fields, week 1 and week 2. The Employment Counselor enters weekly hours in each of the fields. If documentation received includes hours for more than two weeks, the Employment Counselor will average the hours to determine a weekly amount to enter on the baseline popup. This is done by dividing the hours by the time period represented in the documentation. If the check stub does not match the UWORKS reporting weeks, but represents two full weeks in the same reporting cycle the Employment Counselor will divide the hours represented on the check stub to represent week 1 and week 2. Once this information is entered, UWORKS will average the hours and project that average number forward for a period of six months. When DWS becomes aware of a change that is representative of continuing circumstances, new documentation will be collected and hours re-projected based on the most current information.

If hours are not consistent, DWS employees may elect not to use the projection process. In that case, DWS employees will enter documented weekly hours in the weekly hours field on the verification screen.

Work Experience

Describe the services or programs the State includes under the activity.

Externships – Externships are experiential learning opportunities offered by educational institutions to give students practical experience in their field of study. Externships are a required component of curriculum. Externships are exempt from FLSA minimum wage regulations because they meet the following conditions: Training is similar to that given in a vocational school and includes occupational skills, the main benefit of the externship is for customers rather than the employer, there is no monetary compensation paid to customers by the participating employer, customers cannot displace regular employees, and the employer is not required to retain customers who successfully complete the externship. Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

The number of countable hours of participation is determined by adding the number of hours in work experience activities in a reporting cycle. Excused absences and holidays may also be added.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.

DWS employees collect and review paper or electronic documentation and then enter or approve verified participation hours on the verification screens in UWORKS. Supporting documentation is maintained in the electronic case file. Acceptable documentation includes: forms provided by DWS for attendance and evaluation or electronic documentation entered into the UWORKS system.

Describe the methods of daily supervision for each unpaid work activity.

DWS staff, contract providers, partner agency staff, and worksite supervisors provide supervision. Documentation will include a signature from the person who is providing the information and is in a position to have knowledge of the actual hours of participation. DWS will consider electronic signatures to be acceptable documentation.

Work Experience Skills Enhancement – The Purpose of Work Experience Skills Enhancement is to improve employability of customers who are not otherwise able to obtain employment. The emphasis is on improving employability by providing an opportunity for customers to acquire the general skills, knowledge and work habits necessary to obtain employment. In addition to job skills, customers participating in Work Experience Skills Enhancement will gain soft skills such as regular attendance, consistent punctuality, positive attitude and behavior, appropriate appearance, good interpersonal relations and effective task completion.

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

The number of countable hours of participation is determined by adding the number of verified hours in the Work Experience activity in a reporting cycle. Excused absences and holidays may also be added.

Customers placed on Work Experience Skills Enhancement are subject to FLSA minimum wage regulations. Customers cannot participate for more hours than the monthly TANF grant amount plus the monthly food stamp amount divided by the Federal minimum wage. UWORKS will calculate the maximum number of hours allowable for each customer assigned to this service.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.

DWS employees collect and review paper or electronic documentation and then enter or approve verified participation hours on the verification screens in UWORKS. Supporting documentation is maintained in the electronic case file. Attendance will be documented using an attendance form provided by DWS, letter or email from organization or electronic documentation.

Describe the methods of daily supervision for each unpaid work activity.

DWS staff, contract providers, partner agency staff, and worksite supervisors provide supervision. Documentation will include a signature from the supervisor or assigned responsible person representing the organization who has knowledge of the actual hours of participation. DWS will consider electronic signatures to be acceptable documentation.

Describe how the types of Work Experience positions that create an employer/employee relationship and are subject to FLSA minimum wage requirements will be determined.

All Work Experience Skills Enhancement activities are subject to FLSA.

Community Service

Describe the services or programs the State includes under the activity.

Utah no longer offers Community Service.

On-the-Job Training

Describe the services or programs the State includes under the activity.

On the Job Training (OJT) – This service is for customers who are job ready and need the same career training that is given to a paid employee while he or she is engaged in productive work. A subsidy is paid to the employer to offset the cost of training provided to customers. OJT placements may be in the public or private sector. Customers enrolled in JT have identified an occupational area for which immediate employment is a realistic goal; have an interest in that occupation, and the aptitude to complete the training as determined by an assessment process.

The length of the OJT is determined by the time needed to learn the necessary skills, but is limited to six months. An OJT is not allowed for jobs that are intermittent, temporary, seasonal, or that pay only commission, or piece rate. The employer is reimbursed no more than 50% of the wage paid to customers.

OJT is different from subsidized employment in two ways. First, OJT is used for job ready customers who need significant on-site training in the knowledge and skills essential to the full and adequate performance of the job in a specific career or occupation. Second, the subsidy the employer receives is used to offset the costs of training the customer, rather than the cost of employing the customer.

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

The number of countable hours of participation is determined by adding the verified number of hours worked in the OJT activity in a reporting cycle.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.

DWS employees enter and/or approve verified participation hours on the verification screen in UWORKS. Supporting documentation is maintained in the electronic case file. Acceptable documentation includes: check-stubs, timesheets, payroll records, letters or email from employers, electronic documentation, collateral contacts to employers, TALX, attendance forms provided by DWS and electronic documentation. If a collateral contact is used to document participation hours, a collateral contact form must be filled out on paper or electronically by a DWS employee or contractor and maintained in the electronic case file.

If the State intends to project forward hours of participation based on current, documented, actual hours, explain how it will make this projection.

Projections for OJT will be based on two weeks of verified participation hours. DWS employees will collect documentation for two weeks of OJT hours and enter those hours on the UWORKS baseline popup on the verification screen. The baseline popup has two different fields, week 1 and week 2. The DWS employee enters weekly hours in each of the fields. Once this information is entered, UWORKS will average the hours and project that average number forward for a period of six months. If the verification does not match the UWORKS reporting weeks, but represents two full weeks in the same, reporting cycle the Employment Counselor will divide the hours represented on the check stub to represent week 1 and week 2. When DWS becomes aware of a change that is representative of continuing circumstances, new documentation will be collected and hours re-projected based on the most current information.

If OJT hours are not consistent, DWS employees may elect not to use the projection process. In that case, DWS employees will enter weekly hours in the weekly hours field on the verification screen.

Job Search and Job Readiness

Describe the services or programs the State includes under the activity.

Intensive Employment Services – Participation with an agency and/or a job coach that provides employment barrier resolution followed by intensively supported employment. While enrolled in this service, customers participate in job readiness activities leading to employment.

Choose to Work Expanded Services –Intensive job development services for individuals with disabilities.

Job Search and Job Readiness Assistance – Participation in intensive job search and job readiness activities. These activities include:

Added budget and life skills training as acceptable activities.

- **Individual Job Search** – Participation in intensive, individual job search. Job search activities include interviewing, researching employers, updating resumes, preparing applications, scheduling and attending informational interviews, as well as completing online applications, WorkKeys, etc.
- **Job Readiness/ Connection Activities** – The use of services available in DWS' Job Connection Area such as: self-directed job search, Electronic Job Board, and Labor Market Information. This can also include the use of career exploration tools such as WinWay Resume, Choices, and career counseling.
- **Mental Health Treatment-Job Readiness** – Resolving job readiness issues by attending counseling sessions, participating in day treatment, taking medications, etc. The need for this service must be based on documentation from a medical or mental health professional.

- **Physical Treatment-Job Readiness** – Resolving job readiness issues by participating in activities related to treatment of a medical condition. This includes physical therapy, attending appointments, etc. The need for this service must be based on documentation from a medical professional.
- **Substance Abuse Treatment-Job Readiness** – Resolving job readiness issues by participating in activities related to resolving drug, alcohol or substance abuse barriers. The need for this service must be based on documentation from a medical or mental health professional.
- **Pre/Post-Employment Training Workshops** – Participation in structured workshops dealing with resume writing, interviewing and interpersonal relationships in the workplace, budgeting, life skills training, as well as employer expectations regarding dress, grooming, ethics, responsibility, etc.
- **Attending DWS Job Club** - Training and completing applications, resumes, cover letters, interview skills, budgeting, career planning, job retention and job search and keeping workshops etc.

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

The number of countable hours of participation is determined by adding the number of hours in each job search/job readiness activity in a reporting cycle. Transportation time between job contacts will be included in the total hours reported for individual job search activities. Transportation time will be documented using electronic documentation or a job search log provided by DWS. Excused absences and holidays may also be included.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.

DWS employees collect and review paper or electronic documentation and then enter or approve verified participation hours on the verification screens in UWORKS. Supporting documentation is maintained in the electronic case file.

Acceptable documentation for the services of: Intensive Employment Services, Choose to Work Expanded Services and Job Search/Job Readiness, include: electronic documentation, job logs, and attendance forms provided by DWS or contractor, or the workshop attendance list in UWORKS.

For Mental Health Treatment-Job Readiness, Physical Treatment-Job Readiness and Substance Abuse-Job Readiness to be included as a Job Search/Job Readiness activity acceptable documentation includes: attendance records from the service provider, electronic documentation or attendance forms provided by DWS.

For customers in Job Search/Job Readiness activities, DWS employees will review two job contacts per customer per week, including transportation time, to verify hours of participation. If job logs or electronic documentations are incomplete or hours cannot be verified, the hours will not be entered on the verification screens in UWORKS and will not be included in the Federal report. DWS employees will mark the electronic documentation or job log indicating which contact was verified each week.

Describe the methods of daily supervision for each unpaid work activity.

Supervision includes daily responsibility for oversight of a customer's participation, although this does not necessarily mean that there will be daily contact with the customer. Daily supervision of customers may include access to any of the supervisors listed in the following paragraph. These supervisors are available to customers so they can report on progress or seek additional guidance as needed before the next regularly scheduled contact. Contact between supervisors and customers must be no less frequently than weekly.

DWS staff, contract providers, partner agency staff, workshop instructors, and treatment service providers may provide supervision. Documentation will include a signature from the supervisor or assigned responsible person representing the organization that is providing the information and has knowledge of the hours of participation. DWS will consider electronic signatures to be acceptable documentation. Hours recorded by electronic documentation are considered signed and approved by one of the above supervisors when submitted.

If the State intends to count substance abuse treatment, mental health treatment and rehabilitation activities, describe the criteria to establish the necessity of treatment or therapy.

For Job Readiness Treatment Activities DWS conducts an assessment to determine the appropriate level of participation for every customer. In conjunction with this assessment, DWS uses medical evidence provided by a qualified medical, substance abuse, or mental health professional. Customers may document hours toward Job Search/Job Readiness during treatment if medical evidence is provided and maintained into the electronic case file.

Define qualified medical, substance abuse, or mental health professionals.

A qualified medical or mental health professional is defined as a State licensed provider of medical or mental health services. DWS will accept documentation from our in-house mental health professionals as well as other qualified health professionals. This documentation must be completed and signed by the medical, substance abuse or mental health provider indicating the type, duration, and frequency of the treatment required. A qualified medical or mental health professional includes one of the following: Medical Doctor (MD), Doctor of Osteopathy (DO), Advance Practice Registered Nurse (APRN), Physician's Assistant (PA) and Licensed Mental Health Therapist, including a psychologist, Licensed Clinical Social Worker (LCSW), Certified Social Worker (CSW), Marriage & Family Therapist (MFT), and Professional Counselor (PC).

Describe how the State ensures that no more than 120 or 180 hours (four consecutive weeks) of job search and job readiness assistance are reported in a 12-month period (or a total of 12 weeks in States that meet the definition of a “needy State” for the Contingency Fund).

The maximum number of hours a customer can use towards job search in the preceding 12-month period is determined by the status of the parent. A table in the data warehouse is updated with the parent’s status regarding participation requirements for each reporting cycle.

- If the customer is a single parent or caretaker relative with a child under the age of 6 in the household, then only 20 hours are required to meet participation. In this situation, the customer has a maximum of 120 hours (240 hours during months meeting “needy State”) in the preceding 12 month period. If the customer does not qualify for the child under 6 reduction in hours (is not a single parent or caretaker relative with a child under the age of 6 in the household), the maximum increases to 180 (360 hours during months meeting “needy State”) hours in the preceding 12 month period.
- After determining the appropriate maximum number of hours for the year, programming will subtract all reported hours in the prior eleven months from that number. The difference will be the maximum number of hours that can be reported for the current reporting cycle. Actual verified hours recorded by the employment counselor will be reported unless that number exceeds the difference.
- The number of job search hours reported in a reporting cycle will be recorded in the data warehouse and used to calculate the number of hours used in the prior eleven months.
- DWS monitors the Unemployment Rate and monthly average of Food Stamp participants to determine “needy State” requirements. This is also verified using the “States Qualifying for Counting Up To Six Additional Weeks of Job Search and Job Readiness” table provided by ACF.
- Programming will not take into account months prior to October 2008.

To identify consecutive job search weeks, a column has been added to a table in the data warehouse. Every week verified job search hours are recorded will count as a job search week. The programming will look at the prior week. If there are no job search hours in the previous week, it will count as week 1. If there is a 1 in the previous week, it will be week 2, etc. If we reach week 5, the verified hours in that week will not be counted towards participation and will not apply towards the yearly maximum. In effect, this will zero out week 5, and if verified hours are recorded in week 6, it will reset the week counter to 1.

Vocational Educational Training

Describe the services or programs the State includes under the activity.

Occupational Skills Training – Employment related education that provides customers specific occupational skills that support employment in entry-level, semi-skilled, or skilled jobs. This service includes short-term, certificate programs such as Certified Nursing Assistance (CNA), Cardiopulmonary Resuscitation (CPR), Commercial Driver’s License, Medical Assisting, etc.

Apprenticeship Training – Classroom training leading to skilled labor and eventual employment for customers who want to learn a trade. Programs must meet the apprenticeship criteria established by the Bureau of Apprenticeship and Training.

Associate’s Degree – An educational activity related to the pursuit of a two-year post high school degree. Training should be limited to activities that give individuals the knowledge and skills to perform a specific occupation.

Bachelor’s Degree – Enrolled in educational program activities related to the pursuit of a four-year post high school degree.

Youth Occupational Skills Training – Bachelor’s – Training in educational program activities related to the pursuit of a four-year post high school degree. Customer must be enrolled in WIA. These customers are work-eligible parents, or caretaker relatives of a minor child, receiving TANF assistance. They are also eligible for WIA because they were between the ages of 14 and 21 at the time of WIA eligibility.

Youth Occupational Skills Training – Employment related education provided with the expectation of customers obtaining specific occupational skills sufficient to become employed in entry level, semi-skilled, or skilled jobs. This service includes short term and certificate programs such as CNA, CPR, lifesaving, etc. Customers must be enrolled in WIA. These customers are work-eligible parents, or caretaker relatives of a minor child, receiving TANF assistance. They are also eligible for WIA because they were between the ages of 14 and 21 at the time of WIA eligibility.

Courses completed in an on-line learning environment only count as a work activity under this definition if the course can meet supervision and verification requirements.

Vocational Education training occurs at private or public educational institutions or training facilities including career and technical education schools, vocational centers, community colleges, and universities.

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

The number of countable hours of participation is determined by adding the number of hours spent in each Vocational Education activity, including study time, in a reporting cycle. Excused absences and holidays may also be added.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.

DWS employees collect and review paper or electronic documentation and then enter or approve verified participation hours, including study time, on the verification screens in UWORKS. Supporting documentation is maintained in the electronic case file. Acceptable documentation includes: Paper or electronic documentation provided by the organization or attendance forms provided by DWS.

Up to one hour of unsupervised study time may be added to the verification screen for each hour of classroom time, if study time is required or advised by the educational institution. Additional study time may be approved, but must be supervised. Total study time may not exceed what is required or advised by the educational institution. DWS employees will maintain documentation of required/advised study time in the case file. Acceptable documentation includes a written or verbal statement from education institution personnel, information listed in a syllabus, a course catalogue, or other information sufficient to establish need.

Describe the methods of daily supervision for each unpaid work activity.

Staff at the education institution will provide supervision including: faculty, instructors, instructional aids, lab supervisors, and study hall supervisors. Documentation will include a signature from the supervisor or assigned responsible person representing the organization who has knowledge of the hours of participation. DWS will consider electronic signatures to be acceptable documentation.

Describe how the State ensures participation in vocational educational training does not count beyond the statutory limitations limiting participation to 12 months lifetime per individual.

To ensure that no more than 12 months of vocational education training count beyond the statutory limitations of 12 months per lifetime of the customer, a column in a table in the data warehouse keeps track of the reporting cycles in which hours of participation have been reported for each FEP customer.

Each FEP customer's record is reviewed to determine if there are any verified hours of participation for vocational education training during a reporting cycle. If a FEP customer has any verified hours of participation for vocational education training during that period, a count of one month is added to the table for that customer. This continues for each reporting cycle in the fiscal year. If a FEP customer meets participation during a reporting cycle without adding the vocational education training hours, they will be reported as "Other Work Activities".

Any additional hours of verified participation in vocational education training beyond the first 12 reporting cycles are included in the total number of hours reported for Jobs Skills Training or Education Directly Related to Employment.

Explain how the State will ensure that basic and remedial education and English as a Second Language (ESL), if such activities are counted, are necessary or a regular part of the vocational education training.

English as a Second Language (ESL) and basic and remedial education are only allowed if the educational institution includes it in the course curriculum. ESL and basic and remedial education are separate services in UWORKS. DWS employees are instructed to use this service for customers who are not pursuing a vocational educational training program. DWS requests copies of course curriculum from customers to ensure that ESL and basic and remedial education are a necessary part of the vocational education training.

Job Skills Training Directly Related to Employment

Describe the services or programs the State includes under the activity.

Second year of vocational education activities including: Occupational Skills Training, Apprenticeship Training, Associate's Degree and Youth Occupational Skills Training. DWS policy requires educational activities to be related to employment. The overall purpose of providing customers training is to help customers increase occupational skills in order to obtain, maintain, and enhance employment that will lead to the customers' ability to support themselves and their families.

English as a Second Language – Enrolled in English as a Second Language educational service. This activity must be directly related to employment for customers.

Basic Skills Remediation – Training that may include adult education, literacy activities, remedial reading, writing, mathematics, or a combination thereof; for customers who have proficiencies below the ninth grade level. This service may also be used to improve basic skills to a level greater than customers held at assessment. This activity must be directly related to employment for customers.

Youth Unpaid Internship/Work Site Learning – The purpose of Youth Unpaid Internships is to provide exposure to different career options and attainment of work readiness skills. Work readiness/work habit skills include, regular attendance, consistent punctuality, positive attitude and behavior, appropriate appearance, good interpersonal relations, and effective task completion. Youth Unpaid Internships are from one to three months.

The following six criteria must be applied when negotiating a youth unpaid internship:

- a. The internship, even though it occurs at a worksite of an employer, must be similar to training which would be given in an educational environment;
 - i. A youth unpaid internship must be structured like a classroom or academic experience as opposed to the employer's actual operations, which means the internship will be viewed as an extension of the intern's educational experience.
 - ii. The internship must provide the intern with work readiness skills that can be used in multiple employment settings, as opposed to skills particular to one employer's operation.
 - iii. The intern does not perform the routine work of the business on a regular and recurring basis, and the business is not dependent upon the work of the intern.
 - iv. The intern may not engage in the operations of the employer by performing productive work (for example, filing, performing other clerical work, or assisting customers).
- b. The internship experience is for the benefit of the intern;
- c. The intern does not displace regular employees, but learns under close supervision of existing staff;

- i. The intern may not displace or partially displace any currently employed employee. The intern may not participate in an internship if the employer has terminated the employment of any regular unsubsidized employee or otherwise caused an involuntary reduction in its workforce with the intention of filling the vacancy with the intern. The intern cannot be in a promotional line that infringes in any way on the promotional opportunities of current employees.
- ii. An unpaid internship is a long-term form of job shadowing allowing an intern to learn certain functions under the close and constant supervision of regular employees. The intern must receive more supervision than regular employees.
- d. The employer that provides the training derives no immediate advantage from the activities of the intern; and on occasion its operations may actually be impeded;
- e. The intern is not necessarily entitled to a job at the conclusion of the internship; and
- f. The employer and the intern understand that the intern is not entitled to wages for the time spent in the internship.

All criteria listed above must occur to be considered a Youth Unpaid Internship/Worksite Learning. This service is not subject to FLSA. Customers must be enrolled in WIA. These customers are work-eligible parents, or caretaker relatives of a minor child, receiving TANF assistance. They are also eligible for WIA because they were between the ages of 14 and 21 at the time of WIA eligibility.

Courses completed in an on-line learning environment only count as a work activity under this definition if the course can meet supervision and verification requirements.

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

The number of countable hours of participation is determined by adding the verified number of hours spent in each Job Skills activity, including study time in a reporting cycle. Excused absences and holidays may also be added.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.

DWS employees collect and review paper or electronic documentation and then enter or approve verified participation hours, including study time, on the verification screens in UWORKS. Supporting documentation is maintained in the electronic case file. Acceptable documentation includes: Paper or electronic documentation provided by the organization or attendance forms provided by DWS.

Up to one hour of unsupervised study time may be added to the verification screen for each hour of classroom time, if study time is required or advised by the educational institution. Additional study time may be approved, but must be supervised. Total study time may not exceed what is required or advised by the educational institution. DWS employees will maintain documentation of required/advised study time in the case file. Acceptable documentation includes a written or verbal statement from education institution personnel, information listed in a syllabus, a course catalogue, or other information sufficient to establish need.

Describe the methods of daily supervision for each unpaid work activity.

Staff at the education institution will provide supervision including: faculty, instructors, instructional aids, lab supervisors, and study hall supervisors. Documentation will include a signature from the supervisor or assigned responsible person representing the organization who has knowledge of the hours of participation. DWS will consider electronic signatures to be acceptable documentation.

Education Directly Related to Employment in the Case of a Recipient who has not received a High School Diploma or a Certificate of High School Equivalency Diploma

Describe the services or programs the State includes under the activity.

Basic Skills Remediation – Training that may include adult education, literacy activities, remedial reading, writing, mathematics, or a combination thereof; for customers who have proficiencies below the ninth grade level or to improve basic skills to a level greater than they held at assessment. This activity must be directly related to employment for customers.

English as a Second Language – English as Second Language educational services. This activity must be directly related to employment for customers.

Second year of occupational skills training – Employment related education that provides customers specific occupational skills that support employment in entry-level, semi-skilled, or skilled jobs. This service includes programs such as, short-term, certificate programs such as Certified Nursing Assistant, CPR, Commercial Driver’s License, Medical Assisting, etc. This activity must be directly related to employment for customers.

Youth Unpaid Internship/Work Site Learning – The purpose of Youth Unpaid Internships is to provide exposure to different career options and attainment of work readiness skills. Work readiness/work habit skills include, regular attendance, consistent punctuality, positive attitude and behavior, appropriate appearance, good interpersonal relations, and effective task completion. Youth Unpaid Internships are from one to three months.

The following six criteria must be applied when negotiating a youth unpaid internship:

- g. The internship, even though it occurs at a worksite of an employer, must be similar to training which would be given in an educational environment;

- i. A youth unpaid internship must be structured like a classroom or academic experience as opposed to the employer's actual operations, which means the internship will be viewed as an extension of the intern's educational experience.
- ii. The internship must provide the intern with work readiness skills that can be used in multiple employment settings, as opposed to skills particular to one employer's operation.
- iii. The intern does not perform the routine work of the business on a regular and recurring basis, and the business is not dependent upon the work of the intern.
- iv. The intern may not engage in the operations of the employer by performing productive work (for example, filing, performing other clerical work, or assisting customers).
- h. The internship experience is for the benefit of the intern;
- i. The intern does not displace regular employees, but learns under close supervision of existing staff;
 - i. The intern may not displace or partially displace any currently employed employee. The intern may not participate in an internship if the employer has terminated the employment of any regular unsubsidized employee or otherwise caused an involuntary reduction in its workforce with the intention of filling the vacancy with the intern. The intern cannot be in a promotional line that infringes in any way on the promotional opportunities of current employees.
 - ii. An unpaid internship is a long-term form of job shadowing allowing an intern to learn certain functions under the close and constant supervision of regular employees. The intern must receive more supervision than regular employees.
- j. The employer that provides the training derives no immediate advantage from the activities of the intern; and on occasion its operations may actually be impeded;
- k. The intern is not necessarily entitled to a job at the conclusion of the internship; and
- l. The employer and the intern understand that the intern is not entitled to wages for the time spent in the internship.

All criteria listed above must occur to be considered a Youth Unpaid Internship/Worksite Learning. This service is not subject to FLSA. Customers must be enrolled in WIA. These customers are work-eligible parents, or caretaker relatives of a minor child, receiving TANF assistance. They are also eligible for WIA because they were between the ages of 14 and 21 at the time of WIA eligibility.

Courses completed in an on-line learning environment only count as a work activity under this definition if the course can meet supervision and verification requirements.

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

The number of countable hours of participation is determined by adding the verified number of hours spent in each education directly related to employment activity, including study time in a reporting cycle. Excused absences and holidays may also be added.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.

DWS employees collect and review paper or electronic documentation and then enter or approve verified participation hours, including study time, on the verification screens in UWORKS. Supporting documentation is maintained in the electronic case file. Examples of acceptable documentation include: Paper or electronic documentation provided by the organization or attendance forms provided by DWS.

Up to one hour of unsupervised study time may be added to the verification screen for each hour of classroom time, if study time is required or advised by the educational institution. Additional study time may be approved, but must be supervised. Total study time may not exceed what is required or advised by the educational institution. DWS employees will maintain documentation of required/advised study time in the case file. Acceptable documentation includes a written or verbal statement from education institution personnel, information listed in a syllabus, a course catalogue, or other information sufficient to establish need.

Describe the methods of daily supervision for each unpaid work activity.

Supervision will be provided by the education institution, including: faculty, instructors, instructional aids, lab supervisors, and study hall supervisors. Documentation will include a signature from the supervisor or assigned responsible person representing the organization who has knowledge of the hours of participation. DWS will consider electronic signatures to be acceptable documentation.

Satisfactory School Attendance for Recipients who have not received a High School Diploma or a Certificate of High School Equivalency Diploma

Describe the services or programs the State includes under the activity.

GED/HS Diploma – Enrolled in GED and HS Diploma. This service can also include other related education activities such as basic skills remediation or ESL if it's part of the GED/HS program.

Youth Tutoring/Dropout Prevention – Coaching, teaching and guiding customers to increase academic success potential. This includes study skills, dropout prevention strategies and instruction leading to secondary school completion. This service also applies to assisting youth with basic skills improvement (remediation), and obtaining a HS diploma or GED. Customer must be enrolled in WIA. These customers are work-eligible parents, or caretaker relatives of a minor child, receiving TANF assistance. They are also eligible for WIA because they were between the ages of 14 and 21 at the time of WIA eligibility.

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

The number of countable hours of participation is determined by adding the number of verified hours in each Satisfactory School Attendance activity, including supervised study time in a reporting cycle. Excused hours and holiday hours may also be added.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.

DWS employees collect and review paper or electronic documentation and then enter or approve verified participation hours, including study time, on the verification screens in UWORKS. Supporting documentation is maintained in the electronic case file. Acceptable documentation includes: Paper or electronic documentation provided by the organization or attendance forms provided by DWS.

Up to one hour of unsupervised study time may be added to the verification screen if study time is required or advised by the educational institution. Total study time may not exceed what is required or advised by the educational institution. DWS employees will maintain documentation of required/advised study time in the case file. Acceptable documentation includes a written or verbal statement from education institution personnel, information listed in a syllabus, a course catalogue, or other information sufficient to establish need.

Describe the methods of daily supervision for each unpaid work activity.

Supervision will be provided by staff at the education institution, including: faculty, instructors, instructional aids, lab supervisors, and study hall supervisors. Documentation will include a signature from the supervisor or assigned responsible person representing the organization who has knowledge of the hours of participation. DWS will consider electronic signatures to be acceptable documentation.

Providing Child Care Services to an Individual Participating in a Community Service Program

Describe the services or programs the State includes under the activity.

DWS does not currently offer this service to FEP customers.

II. Hours Engaged in Work

Excused Absences and Holidays

Describe the State's excused absence policies for unpaid work activities. This includes its policies for holidays as well as the excused absences that the State may count in a 12-month period. If the policies vary by work activity, the State should describe how they vary and for which activities. Plans must specify the holidays being excused – and also explain how State's track excused absences in their system.

DWS counts the following holidays towards participation: New Year's Day, Martin Luther King Jr. Day, President's Day, Memorial Day, Independence Day, Pioneer Day, Labor Day, Veteran's Day, Thanksgiving, and Christmas Day. Customers must be scheduled to participate on the holiday for the hours to count towards participation.

Holiday hours are entered into the UWORKS verification popup for each holiday by DWS employees. The hours will be attached to the work activity the customer is excused from participating in due to the holiday. Each of the ten holidays will be identified on the verification popup. DWS employees will only be allowed to enter holiday hours on the day the holiday is observed as designated on the verification screen. A maximum of 10 hours can be applied on any one holiday.

Excused hours are entered into the UWORKS verification popup for each excused absence by DWS employees. The hours will be attached to the work activity the customer is excused from participating in. No more than 16 hours per reporting cycle of excused absences are allowed to count as participation and no more than 80 hours of excused absences are allowed to count towards participation in a year (current reporting cycle and prior 11 reporting cycles). Customers must be scheduled to participate during the excused time for the hours to count towards participation. Excused hours are only reported if they are needed to meet participation requirements.

Unpaid work activities eligible for the addition of holiday and excused hours include all activities that fall into the following federal categories (see above for definitions):

- Work Experience
- Job Search/Job Readness
- Vocational Educational Training
- Job Skills Training Directly Related to Employment
- Education Related to Employment, No HS Diploma
- Satisfactory School Attendance for Recipients who Have Not Received a High School Diploma or Certificate of High School Equivalency Diploma

FLSA Deeming

If the State wishes to use the "deeming" provision permitted at §§ 261.31 and 263.32 for work experience or community service programs, describe how the State determines the work hours requirement, including how the monthly TANF grant and food stamp allotment combined and divided by the appropriate minimum wage to meet the "core" participation requirement. Include a statement certifying that the State has adopted a mini Simplified Food Stamp Program in order to count the value of food stamp benefits.

To determine the maximum number of hours a customer may participate in Work Experience, UWORKS will look at the previous month's TANF and Food Stamp benefit amounts. The monthly grant amounts will be added together then divided by the higher of the Federal or State minimum wage and divided again by the number of weeks in the reporting cycle to determine a weekly amount. When the Work Experience service is added to the employment plan, the "hours" field will automatically populate with the maximum number of hours as determined by the previous month's benefits. Employment Counselors may assign fewer hours but may not assign more than the maximum number as determined in the calculation. Employment Counselors will assign fewer hours when a customer is participating in other countable activities or there are barriers that prevent the customer from participating at that level. The Employment Counselor verifies the actual number of hours the customer participated in our UWORKS system and all verified hours are reported.

Each month, the system will determine whether there have been changes to TANF and Food Stamp benefit amounts. If benefit amounts have changed, the system will calculate the maximum monthly number of hours a customer may participate in Work Experience the following month using the procedure described above. A UWORKS task will be sent to Employment Counselors on the 11th of each month notifying them of the change in hours. Employment Counselors have until the first of the following reporting cycle to negotiate the change with the work experience site supervisor and customer. The hours will then be changed on the employment plan as negotiated with the customer. A table will be maintained behind the scenes to store the monthly calculation of hours on deemed cases and will be used to determine the hours that may be deemed. Deeming will only occur once a customer participates for the maximum monthly hours allowed under FLSA.

Utah implemented a Mini-Simplified Food Stamp Program on May 1, 2007, which allows the state to match its Food Stamp exemptions to those of its TANF program.

III. Work Eligible Individual

Describe the State's procedures for identifying all work eligible individuals, as defined at §261.2. This should include the procedures needed to identify a non-recipient parent excluded from the definition of work-eligible individual.

Utah's eligibility system captures demographic information on all members of a household and identifies which members of the household are included on a FEP case. This information includes the relationship of each of the household members to the head of household or primary person on the case. The work eligibility status of all adults in the household, whether included on the case or not is defined as follows:

Work Eligible:

- Any adult (or minor child head-of-household) receiving assistance
- Any parent included in the household unit, but excluded from the assistance payment, because of disqualification for fraud or another reason
- Any parent receiving SSI or SSDI who met participation requirements

Not Work Eligible

- A caretaker relative not receiving assistance. This is determined by the relationship of the children on the case to the caretaker relative.

- Any non-recipient parent receiving SSI or SSDI who did not meet participation requirements
- Any non-recipient parent who is unable to work due to his/her immigration status (undocumented alien)
- A parent caring for a disabled family member during each week of the reporting cycle

Describe the procedures for identifying a parent caring for a disabled family member, who may also be excluded from the definition of a work-eligible individual.

DWS is opting to exclude parents caring for a disabled family member, from the definition of a work-eligible individual. DWS will use the following definitions to determine whether a parent meets these criteria:

A Disabled Family Member is defined as a family member who is incapable of providing for themselves and who requires a parent in the home to meet their daily needs. This family member must live in the household but is not necessarily included in the financial case. Disabled family members can include: Natural, step, or adoptive children, current spouse, other parent of the dependent child(ren) in the household.

The need for a parent to remain in the home to care for a disabled family member will be documented via a written statement from a Medical Doctor (MD), Doctor of Osteopathy (DO), a Licensed Mental Health Therapist as defined in Utah Code 58-60-102, a Licensed Clinical Social Worker(LCSW), Certified Social Worker (CSW), Marriage & Family Therapist (MFT), Professional Counselor (PC), Advanced Practice Registered Nurse (APRN), or a Physicians Assistant (PA) (unless the dependent is on the Travis C Medicaid waiver program). The written statement must be based on a current physical examination of the person, not just a review of the person’s medical records and must include: the diagnosis of the family member’s condition, the recommended treatment needed or being received for the condition, the length of time the parent will be required in the home to care for the family member, and whether the parent is required to be in the home. The need for the parent to remain in the home must be at least 30 days or longer.

For permanent or temporary disability, medical evidence must be provided to Employment Counselors no less than every six months, or at the time the medical evidence documents that the family member is no longer disabled.

If it is determined that a parent meets the definition above, an Employment Counselor will open the “Parent Caring for a Disabled Family Member” service in UWORKS and enter an actual start date so the date the parent meets this requirement can be identified.

If the service opens or closes during a reporting cycle, the individual will be considered work eligible for all full weeks the service is not open.

Describe verification procedures for ensuring the accuracy in reporting of work-eligible individuals on the TANF Data Report and the SSP-MOE Data Report, including:

- *The correct reporting of the Work Participation Status of all adult (or minor child head-of-household) family members, and*
- *The proper identification of TANF Families for inclusion in only the overall work participation rate or the overall and two-parent work participation rates, or exclusion from both the overall and two-parent work participation rates.*

There are two groups of customers on our SSP-MOE program. These two groups include:

1. Eligible alien parents receiving financial assistance who have been in the country for less than five years from the month of the TANF Federal report, and are not receiving Food Stamps or have been disqualified from receiving Food Stamps for the reporting month.
2. Parents who are employed and enrolled in the Transitional Cash Assistance (TCA) Program. This program provides up to three months of financial assistance after the FEP case closes for income.

Remaining TANF recipients are in the FEP program.

When DWS codes the Work Participation Status of all adults on FEP or SSP-MOE, the following programming routines are performed in the order listed:

1. If the sum of verified participation hours in:
 - a. Unsubsidized Employment, Subsidized Private-Sector Employment, Subsidized Public-Sector Employment, Work Experience, On-the-Job Training, Job Search/Job Readiness, and Vocational Education Training is equal to or greater than 30, THEN
 - b. The Work Participation Status field is coded 19 (meeting participation requirements).
2. If the sum of verified participation hours in:
 - a. Unsubsidized Employment, Subsidized Private-Sector Employment, Subsidized Public-Sector Employment, Work Experience, On-the-Job Training, Job Search/Job Readiness, and Vocational Education Training is equal to or greater than 20 and less than 30, AND
 - b. The sum of verified participation hours in Job Skills Training, Education Related to Employment for Individuals without a High School Diploma or GED, or Satisfactory School bring the total verified participation hours to 30 or more, THEN
 - c. The Work Participation Status field is coded 19 (meeting participation requirements).
3. If the type of family is coded as a “3” and the adult has a work eligible indicator of 06, 07, 08, 09, 10, 11, or 12, the work participation status is coded as a “99.”

4. If the service of Parent Caring for a Disabled Family Member is opened on the employment plan in UWORKS and an actual start date has been entered for the entire reporting cycle, the work participation status is coded as a "99." The adult will have a family affiliation of a 1 or 2 and a work eligible indicator of 09. If the service is open for a portion of the reporting cycle, the adult will be considered a work eligible individual and participation will be prorated for all full weeks the service is not open.

5. If there is:
 - a. Only one adult in the FEP family, AND
 - b. The age of the youngest child is calculated based on his/her verified birth date to be less than 6 years old on the first day of the calendar month, AND
 - c. The sum of verified participation hours in Unsubsidized Employment, Subsidized Private-Sector Employment, Subsidized Public-Sector Employment, Work Experience, On-the-Job Training, Job Search/Job Readiness, and Vocational Education Training is equal to or greater than 20 and less than 30, THEN
 - d. The Work Participation Status field is coded 17 (Deemed engaged in work – parent or caretaker relative, with a child under age 6 in the household, who is engaged in work activities for at least 20 hours per week).

6. If the adult on the FEP case:
 - a. Is calculated to be less than age 20 based on their verified birth date on the first day of the calendar month, AND
 - b. The adult does not have a High School Diploma or GED, AND
 - c. The verified participation hours in Satisfactory School (GED/HS Diploma or Youth Tutoring/Dropout Prevention) are greater than 0 identifying the adult as maintaining satisfactory school attendance, THEN
 - d. The Work Participation Status field is coded 15 (Deemed engaged in work – single teen head-of-household or married teen who maintains satisfactory school attendance).

7. If the adult on the FEP case:
 - a. Is calculated to be less than age 20 based on their verified birth date on the first day of the calendar month, AND
 - b. The adult does not have a High School Diploma or GED, AND
 - c. The verified participation hours in Education Related to Employment for Individuals without a High School Diploma or GED are equal to or greater than 20, THEN
 - d. The Work Participation Status field is coded 16 (Deemed engaged in work – single teen head-of-household or married teen who maintains satisfactory school attendance).

8. If there is:
 - a. Only one custodial parent in the FEP family, AND
 - b. The age of the youngest child is calculated based on his/her verified birth date and the first day of the calendar month to be less than 1, AND
 - c. The custodial parent has not been disregarded from the participation rate for more than 12 months, THEN
 - d. The Work Participation Status field is coded 01 (Disregarded from participation rate, single custodial parent with child under 12 months).

9. If:
 - a. The family affiliation for the adult is coded a 1 (he/she is a member of the eligible family receiving assistance), AND
 - b. The adult is receiving federal disability that is NOT SSI or SSDI THEN
 - c. The Work Participation Status field is coded 7 (Exempt, disabled).

10. If:
 - a. The family affiliation for the adult is coded a 2 (he/she is not in the eligible family receiving assistance, but in the household), AND
 - b. The adult is receiving SSI or SSDI THEN
 - c. The Work Participation Status field is coded 99 (not required to participate).

11. If the sum of verified participation hours in:
 - a. Unsubsidized Employment, Subsidized Private-Sector Employment, Subsidized Public-Sector Employment, Work Experience, On-the-Job Training, Job Search/Job Readiness, and Vocational Education Training is greater than 0 and less than 30, AND
 - b. The sum of verified participation hours in Job Skills Training, Education Related to Employment for Individuals without a High School Diploma or GED, or Satisfactory School is equal to 0, THEN
 - c. The Work Participation Status field is coded 18 (participating but not meeting required participation levels).

12. If the sum of verified participation hours in:
 - a. Unsubsidized Employment, Subsidized Private-Sector Employment, Subsidized Public-Sector Employment, Work Experience, On-the-Job Training, Job Search/Job Readiness, and Vocational Education Training is greater than 0 and less than 20, AND
 - b. The sum of verified participation hours in Job Skills Training, Education Related to Employment for Individuals without a High School Diploma or GED is greater than 0, AND
 - c. Satisfactory School is equal to 0, THEN
 - d. The Work Participation Status field is coded 18 (participating but not meeting required participation levels).

13. If the sum of verified participation hours in:

- a. Unsubsidized Employment, Subsidized Private-Sector Employment, Subsidized Public-Sector Employment, Work Experience, On-the-Job Training, Job Search/Job Readiness, and Vocational Education Training is equal to or greater than 20 and less than 30, AND
 - b. The sum of verified participation hours in Job Skills Training, Education Related to Employment for Individuals without a High School Diploma or GED doesn't bring the total to 30, AND
 - c. Satisfactory School is equal to 0, THEN
 - d. The Work Participation Status field is coded 18 (participating but not meeting required participation levels).
14. If the sum of verified participation hours in:
- a. Unsubsidized Employment, Subsidized Private-Sector Employment, Subsidized Public-Sector Employment, Work Experience, On-the-Job Training, Job Search/Job Readiness, Vocational Education Training, Job Skills Training, Education Related to Employment for Individuals without a High School Diploma or GED, or Satisfactory School is equal to 0, THEN
 - b. The Work Participation Status field is coded 14 (not participating-0 participation hours).

The proper identification of TANF Families for inclusion in only the overall work participation rate or the overall and two-parent work participation rates, or exclusion from both the overall and two-parent work participation rates.

Two-Parent cases are paid out of State monies not used for MOE and are therefore excluded from both the overall and two-parent work participation rates.

Describe how the State ensures that, for all work-eligible individuals, it accurately inputs data into the automated data processing system; properly tracks the hours; and accurately reports countable hours to HHS that do not include participation activities that do not meet a federal definition.

All reporting programming goes through a code review process where one programmer reviews the programming statements for accuracy. All programming output data is reviewed and tested exhaustively prior to being used for reporting purposes.

IV. Internal Controls

Describe the internal controls designed to ensure established work verification procedures are properly being employed.

DWS has several internal controls it will use to ensure established work verification procedures are properly being employed.

UWORKS System Controls

UWORKS is programmed to coincide with the reporting cycles previously defined. Verification screens will freeze the last business day of the following reporting cycle. Once the screens freeze, DWS employees will not be allowed to add new verified hour entries.

To ensure that DWS employees are reporting the start date of activities appropriately, an actual start date has been added to the employment plan. The actual start date may be backdated however, the date may not predate a day for which data has already been frozen and may not precede the employment plan start date. The actual start date cannot be postdated. Services that do not have an actual start date will not appear on the verification popup and cannot be verified.

A service may be added to the employment plan without an actual start date entered; however, Employment Counselors will receive system-generated tasks if an actual start date has not been entered. Tasks are generated two weeks after the service is added to the plan and every week thereafter until the actual start date is added to the plan.

To ensure that DWS employees are entering verified hours in the UWORKS system, tasks will be sent to the Supervisor on the last business day prior to the verification due date notifying them that verified hours have not been entered.

For any hours entered with a decimal amount, UWORKS will round the number to make sure that the calculations are consistent.

Policy Development and Training

DWS has written policies and procedures relating to supervision, documentation and verification. All policies are located in DWS Workforce Development Division (WDD) Policy Manual. The WDD Policy Manual is available on the Web and is regularly updated and maintained. DWS staff are informed when policy and procedure changes have been made to the manual.

DWS training is provided to new and incumbent staff. New employees receive training designed to teach them the information they need to start working with customers. Most courses are designed to teach policy, procedures, philosophy and practical application, while incorporating use of the computer system in the learning process. More advanced courses on specific programs are available to ensure more comprehensive understanding. These courses also focus on relevant policy, procedure, philosophy and practical application.

“Just-in-Time” training is designed and developed to train/support a new program or concept. Generally, these training sessions are delivered in a “Train the Trainer” setting, where experts/specialists from the various areas of the state are trained. They, in turn, train employees in their local offices, often with the assistance of state program specialists. Just-in-Time concepts are then incorporated into regular training curriculum, where appropriate, to ensure employees receive training on these changes as part of their new employee training. DWS provided TANF Reauthorization Just-in-Time training in September 2006, September 2007, and September 2008. DWS has provided additional staff training on updates and clarifications in October 2010, December 2010 and will be providing additional training May 2011. .

Describe the internal controls for data errors, including transcription and coding errors, data omissions, computational errors, and compilation errors.

There are several processes in place to help detect and correct data errors, including transcription and coding errors, data omissions, computational errors, and compilation errors.

1. UWORKS contains employment plans for every customer including the services and hours the customer has agreed to participate in. UWORKS also contains all verified hours for electronic and hard copy documentation. In addition, our imaging system, Content Manager, maintains hard copy documentation provided for verification.
2. The verification screen in UWORKS shows the total hours verified for each week for each service. The verification screen shows expected and verified hours of participation. Employment Counselors and Supervisors may use these fields to ensure hours and activities are appropriate.
3. The holiday popup on the verification screen in UWORKS will only allow hours to be entered on a day that has been designated as one of the ten holidays specified above.
4. DWS also generates participation reports from its data warehouse. One lists each customer's services that were open the previous reporting cycle, the number of hours the customer has agreed to participate in each service, and the actual verified hours. Both Employment Counselors and Supervisors can review the report for discrepancies.
5. Prior to transmitting data for the quarterly reports, the total hours of participation to be reported for each FEP customer are added together. For any case where the total hours of participation are 60 or more hours, each case is reviewed individually for:
 - a. The actual date the customer started participating in each service.
 - b. The hours entered on the verification screen compared to the documentation used to verify those hours.
 - c. The tasks listed under each service to see what the customer agreed to do.
 - d. The narrations in UWORKS written by DWS employees.
 - e. Earnings entered in the eligibility system (if the service is employment-related).
 - f. Changes may be made to the data prior to transmitting depending on the information contained in a, b, c, d, and e above.
 - g. DWS also calculates the following:
 1. The average weekly hours of participation for each work activity for the reporting cycle to make certain the programming is calculating the participation hours correctly.
 2. The number of weeks the customer has had Job Search and Job Readiness services open during the fiscal year to make certain the programming is calculating the participation hours correctly and are appropriately reported.
 3. The number of months the customer has had Vocational Education services open to make certain the programming is calculating the participation hours correctly and the hours are appropriately reported.

4. Any excused hours to make certain the customer has not used more than 16 hours in the reporting cycle or 80 hours during the previous year, that the programming is calculating the participation hours correctly, and they are appropriately reported. Excused hours are reported if they are needed to meet participation requirements.
5. Any holidays to make certain the programming is calculating the participation hours correctly, and they are appropriately reported.

Describe the checks to isolate electronic systems and programming errors and the steps to ensure that all work participation report items are internally consistent.

UWORKS programming goes through a code review process where one programmer reviews the programming statements for accuracy. All UWORKS output data is reviewed and tested prior to being released in the production system.

Describe any sampling and estimation techniques employed in data validation. Document the soundness of all statistical procedures utilized.

An independent audit group from DWS, Performance Review Team will conduct an annual review of TANF cases. The scope of the review includes ensuring Federal definitions are applied appropriately, that documentation used for verification of participation hours is complete and accurate, and that discrepancies are resolved according to DWS' policies and procedures.

A random sample of 150 cases will be pulled without intentional bias to include or exclude items in the population. A cross-section review indicates compliance and outlines the steps that must be taken to improve performance. Although not statistically valid, the sample size will be representative of the TANF universe.

The review criteria are based on interim final rules and DWS' policies and procedures related to documenting and verifying TANF participation hours. DWS is aware that criteria may need to be adjusted prior to each annual review to reflect any additional criteria or elements that have been identified as vulnerable to mistakes.

A standard tool has been created to provide consistency in the review process, and to document the findings of each case reviewed. The results of the review will be maintained in a database to provide statistical analysis capabilities.

A written report of results, trends, and data analysis will be compiled upon completion of the review and submitted to the TANF program team to ensure any issues identified will be reviewed and appropriate actions taken. All findings will be maintained for future analysis and tracking purposes.

V. Verification of Other Data Used in Calculating the Work Participation Rate

Describe the State's data validation procedures to ensure complete and accurate data reporting. Describe any procedures employed to eliminate data inconsistencies between two or more data elements for each element.

For each of the following data elements, DWS programming gathers information from our eligibility computer system. DWS' procedures to ensure complete and accurate data reporting include:

- a. Reporting Month – Every FEP customer that received a benefit for the reporting cycle is included. If the customer is a new applicant, we will include them in the reporting cycle in which they are issued a benefit.
- b. Stratum – DWS reports on the entire population and does not use stratum.
- c. Case Number – Every FEP customer has a unique case number auto assigned by the eligibility computer system. The case number can be from three to eight digits.
- d. Disposition – Because we make certain that every FEP customer received a benefit for the reporting cycle, we do not have any that should be listed in error.
- e. Type of Family for Work Participation – Since this is such a crucial data element that impacts several other data elements; we use the following comprehensive process to make certain this is coded correctly.
 1. If all of the adults on the FEP case are coded as “MS1,” which means they are included on the case and required to participate, the case is coded a 1 (family included in overall work participation rate).
 2. If all of the adults on the FEP case have a code other than “MS1” (e.g., Ineligible Alien, or receiving Social Security Disability), the case is coded a 3 (family excluded from both the overall and two-parent work participation rates).
 3. If one of the adults on the FEP case is coded as “MS1,” but a second adult on the FEP case is not, the case is coded a 1 (family included in overall work participation rate).
 4. Two-Parent cases are paid out of State monies not used for MOE and are therefore excluded from both the overall and two-parent work participation rates.
- f. Amount of Food Stamps Assistance - When calculating the amount of food stamps received by the FEP family, the eligibility system will be reviewed to see if there are any Food Stamp household members who are excluded from the TANF household.
 1. If there are additional family members included in the Food Stamp household who are excluded from the TANF household, the amount of food stamps will be prorated equally among each food stamp recipient then the amounts added together for each of the TANF recipients.
 2. If there are no additional family members included in the food stamp household, the amount of food stamps received by the TANF family will be reported.
- g. Receives Subsidized Child Care - Eligibility workers issue subsidized child care through the DWS eligibility system.
 1. If child care is issued for a reporting cycle, this data element is coded a 1 (yes, receives child care funded entirely or in part with Federal funds).
 2. If child care is not issued for a reporting cycle, this data element is coded a 3 (no subsidized child care received).
- h. Amounts of TANF (and SSP-MOE) Assistance

1. For FEP assistance, this data element includes the amount of the FEP benefit received for the reporting cycle AND the amount (if any) paid for emergencies such as car repairs, clothing, general incidental expenses, bus tokens, etc.) If the TANF adult is participating in training or worksite learning, it will also include the amount provided for childcare.
- i. Family Affiliation Code - This data element is determined for each person on the TANF case.
 1. If an adult in the household is included on the FEP case, which means he or she is required to participate, the adult is coded a 1 (member of the eligible family receiving assistance).
 2. If an adult in the household is the parent of a child on the FEP case, but is not included in the benefit amount;i.e. is coded Disqualified for Fraud, Ineligible Alien, SSI, or SSDI recipient, the adult is coded a 2 (parent of minor child in the eligible family receiving assistance).
 3. If an adult in the household is not a parent of a child on the FEP case and is not included in the benefit amount, the adult is coded a 3 (caretaker relative of minor child in the eligible family receiving assistance).
 4. A check is made to determine if any children under the age of 19 on the FEP case have a code other than “MS1”,. If true, the child will be coded a 4 (minor sibling of child in the eligible family receiving assistance).
- j. Non-Custodial Parent Indicator - Utah does not: provide assistance to non-custodial parents, track participation in work activities of non-custodial parents or designate them as a member of the family. As such Utah is not required to report on non-custodial parents and will report this element with a 2 (No).
- k. Date of Birth (Adult)
 1. This is verified through a Social Security interface.
 2. If the FEP applicant is an alien, the date of birth is taken from the Alien Certification card. The Alien number is verified through the System for Alien Verification (SAVE).
- l. Relationship to Head-of-Household
 1. If the adult on the FEP case is the head of household, that individual is coded a 01 (head-of-household).
 2. If the adult on the FEP case is the spouse of the head of household, that individual is coded a 02 (spouse).
 3. If the parent of the head of household is on the FEP case, that individual is coded a 03 (parent).
 4. The children of the head of household are coded a 04 (daughter or son).
 5. The stepchildren of the head of household are coded a 05 (stepdaughter or stepson).
 6. The grandchild or great grandchild of the head of household is coded a 06.
 7. The brother, sister, nephew, niece, or cousin of the head of household is coded a 07.
 8. The foster child of the head of household is coded a 08.
 9. A child not related to the head of household is coded a 09.
 10. An adult not related to the head of household is coded a 10.

Consistency between type of family, family affiliation, marital status, and relationship to head of household is reviewed. If a conflict arises between marital status and relationship to head of household, relationship to head of household takes precedence, as this information is updated in the eligibility system more frequently.

- m. Parent with Minor Child in Family
 - 1. To be eligible for FEP, the household must have at least one child under the age of 19 living in the home. A natural parent, adoptive parent, or step-parent on a FEP case will be coded a 2 (yes, a parent with a minor child in the family, but not used in two-parent participation rate).
- n. Work-Eligible Individual Indicator - The eligibility system identifies whether an adult on the FEP case is part of the family receiving assistance. An edit is in place to verify that the type of family is consistent with the work eligible status of the adults in the household. If a conflict between these two elements is found, the case is reviewed manually, a determination is made on the work eligible indicator for each adult in the household, and the type of family is derived from that determination.
- o. Date of Birth (Child)
 - 1. This is verified through a Social Security interface.
 - 2. If the FEP applicant is an alien, the date of birth is taken from the Alien Certification card. The Alien number is verified through the System for Alien Verification (SAVE).

Prior to submitting the TANF Quarterly Report, edits are run to identify data inconsistencies according to federal edit reports. Cases identified during this process are reviewed manually and updated to comply with reporting guidelines.

Work Participation Status

Describe the State's procedures to ensure that a family is not disregarded from the work participation rate for more than 12 months per lifetime based on being a single custodial parent with a child less than one year of age.

DWS ensures that an adult is not disregarded from the work participation rate for more than 12 months per lifetime based on being a single-custodial parent with a child less than one year of age by keeping track of each month the adult is disregarded in a table in a data warehouse. We will also check to make certain that the adult is a single-custodial parent and that the child is less than one year of age based on the child's birth date as of the first day of the calendar month.

Describe procedures to ensure that a family is not disregarded from the work participation rate for more than three months in any period of 12 consecutive months based on a work-eligible individual's refusal to participate in work.

DWS no longer uses this disregard.

Describe the procedures for ensuring a family deemed engaged in work based on 20 hours of participation in countable work activities meets the requirements of a single custodial parent or caretaker relative with a child under age six.

DWS ensures a parent or relative who is the only parent or caretaker relative in the household and is deemed engaged in work based on 20 hours of participation in countable work activities meets the requirements of a single custodial parent or caretaker relative with a child under age six in the home.

DWS determines that the child is less than six years of age based on the child's age as of the first day of the calendar month. DWS also determines if there is another adult in the TANF household.