



Department of Human Resources
311 West Saratoga Street
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FIA ACTION TRANSMITTAL

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**TO: DIRECTORS, LOCAL DEPARTMENTS OF SOCIAL SERVICES
DEPUTY/ASSISTANT DIRECTORS FOR FAMILY INVESTMENT
FAMILY INVESTMENT SUPERVISORS AND ELIGIBILITY STAFF**

FROM: CHARLES E. HENRY, EXECUTIVE DIRECTOR

RE: VERIFICATION OF WORK ACTIVITIES AND ATTENDANCE

PROGRAM AFFECTED: TEMPORARY CASH ASSISTANCE

ORIGINATING OFFICE: OFFICE OF POLICY, RESEARCH AND SYSTEMS

BACKGROUND:

In response to State legislative audit findings, DHR must verify the hours of TCA customers' attendance in work activities that are recorded in the Work Opportunities Management Information System (WO MIS) and reported to the U.S. Department of Health and Human Services (HHS). HHS uses the hours reported, along with information on the type of activities provided, to calculate the TANF Work Participation Rate and to determine if the State has required work-mandatory customers to engage in work activities after their 24th month. HHS can levy significant financial penalties against states whose actual rates do not meet or exceed required rates or who fail to engage customers that have received more than 24 months of federally funded TCA in work activities. Local departments, or their vendors, are expected to collect attendance documentation on customers engaged in work activities and maintain them in case files.

SUMMARY:

The actions described below require local departments to make a "reasonable effort" to verify all work activity attendance hours reported in WO MIS. Our intent is to provide local departments with maximum flexibility in deciding how to verify hours of attendance. Although we have identified preferred verification documents, other forms of proof will be acceptable. We suggest that local departments develop standard forms and implement uniform procedures to be used by customers in work activities to verify their participation and hours of attendance.

ACTION REQUIRED:

Local departments must make “reasonable efforts” to submit written evidence to DHR verifying all hours of attendance reported for TCA customers on the federal TANF report. This requirement involves customers who are randomly selected each month as part of the TANF Federal Reporting Sample and counted toward the federal Work Participation Rate. It also includes all families selected in the sample that have received more than 24 months of federally funded TCA and are coded in WO MIS as participating in Other State/Locally Defined Work Activities.

More specifically, DHR sends out the names of customers who are members of TCA cases selected at random for the federal report. All documentation verifying attendance in federal or State/Local work activities (i.e., the 12 categories identified in Section 407 of PRWORA or in OT* activities) must be submitted to DHR. The documentation must clearly indicate that the customer engaged in the specified work activity in the month they are included in the sample.

For customers engaged in federally recognized work activities:

The term “reasonable effort” means that local program staff or their vendors attempted to obtain written evidence from a “reliable source” that the TCA customer actually participated for the monthly numbers of hours of attendance recorded in WO MIS. “Reliable source” means someone other than the TCA customer or his/her immediate family whom the local department believes to be truthful. If documentation of the customer’s attendance in the work activity is not available and attempts to verify the attendance in other ways cannot clearly demonstrate that the customer participated in the activity that month, do not enter any attendance in WO MIS.

Example 1: Ms. Rogers has been assigned to the local community college for vocational education and a job readiness seminar. She is required to participate in 25 hours of classroom instruction each week and 5 hours of job readiness assistance. As part of their contract with DSS, the community college keeps records of attendance for the classroom instruction and has sign-in sheets for the job readiness activity. Each month the community college provides those documents to the local department. A copy of the records for Ms. Rogers are maintained in her file by the community college, local department, or both.

For customers engaged in State/Locally defined work activities:

The term “reasonable effort” means that local program staff or their vendors attempted to obtain written evidence from the customer or other knowledgeable person that the customer participated in the designated work activity, consistent with their Independence Plan, in the month. The documentation must clearly indicate that the customer was engaged in an activity: otherwise,

the case should be closed, following the appropriate conciliation procedures, for failure to comply with work requirements.

Example 2: Ms. Jones has a torn Achilles tendon and has provided a 402 medical statement showing the length of her disability. The local department determines that Ms. Jones is in compliance with her Independence Plan for the specified time period by receiving necessary medical treatment. Ms. Jones submits a signed and dated monthly statement indicating that she is attending her scheduled doctor appointments, going to physical therapy and taking her medications.

Example 3: Ms. Baxter is needed in the home to care for her disabled husband. The local department has a current 402 medical for the husband and a statement from the husband's doctor that Ms. Baxter is needed in the home to care for him. Ms. Baxter provides a signed and dated monthly statement that indicates the hours spent providing care to Mr. Baxter during the month.

Work participation documentation should be submitted in accordance with the instructions in the TANF Federal Reporting memorandum sent to each local department with the list of TANF sampled cases. The TANF Federal Reporting memorandum will include the date by which the documentation must be submitted to DHR and the location where the documentation should be sent. Original copies of the documentation should also be retained in the customer's case file, either in the local department or at the vendor location, so that it is available to federal or state auditors, if necessary.

The attached chart was developed to help clarify what approaches/sources of verification are preferred, acceptable, and not acceptable. This chart establishes minimum requirements for the types of acceptable documentation. Local departments are expected to establish their own internal procedures for collecting and submitting their verification documentation.

INQUIRIES

Please direct questions to Mark Millsbaugh at 410-767-8558.

cc: FIA Management Staff
Constituent Services
Help Desk
CTF

GUIDELINES ON ACCEPTABLE VERIFICATION

| Level of Acceptability | Source of Documentation | Examples of Documentation |
|-------------------------------|---|--|
| Preferred | Reliable person who supervises or oversees the activities of the customer. | Signed statement of attendance from employer/supervisor; pay stubs; daily/weekly attendance sheets that are signed by both the customer and a supervisor. A copy of the signed and dated Conciliation letter for customers in an OTC WO MIS activity code. |
| Acceptable | <p>Reliable person who has indirect knowledge of the customer's attendance, excluding family members.</p> <p>Customer's word or statement for activities in which supervision of the customer's attendance is not possible.</p> | Signed and dated written summaries of a conversation between a staff member and the supervisor of the customer's activities, or other reliable person; signed and dated statement from customer for individual Job Search or other activities in which the customer is not being directly supervised. This may include, but is not limited to, participation in medical treatment and provision of care for a disabled household member. |
| Not Acceptable | Customer's word or statements from members of the customer's family (except for individual Job Search or other activities in which supervision of the customer's attendance is not possible). | Copies of the WO MIS Attendance Screen, unsigned documents, documents that are undated or dated for periods other than the report period. |