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

FROM: KEVIN M. McGUIRE, EXECUTIVE DIRECTOR

RE: TRACKING ATTENDANCE IN TANF WORK ACTIVITIES

PROGRAM AFFECTED: TEMPORARY CASH ASSISTANCE

ORIGINATING OFFICE: OFFICE OF POLICY, RESEARCH AND SYSTEMS

SUMMARY:

Maryland’s achievement on the federal Work Participation Rate has been among the lowest in the United States for the last three years. Although many adult TCA recipients are engaged in activities consistent with their Independence Plans, too few are participating in countable federal activities for enough hours to count toward the participation rate. Action Transmittals #97-66 Revised and #97-67 explain the work requirements and define the work activities that adult TCA recipients are expected to engage in. Action Transmittals #00-39, #01-25, #02-61 and #02-84 further explain the requirements to collect activity and attendance documentation for adult TCA recipients engaged in work activities.

This transmittal describes the requirements to track customer attendance in work activities and enter the activity and attendance information into the Work Opportunities Management Information System (WO MIS) for all customers engaged in TANF work activities.

ACTION REQUIRED:

Case managers are required to collect hourly attendance information for any customer engaged in a work activity. Attendance information must be entered into WO MIS for the following TANF work activities (Core and Non Core) and may be entered for other work activities:

(Note: These are revised definitions of TANF work activities effective with this Action Transmittal. Revisions are underlined. All previous definitions are obsolete.)
Core TANF Work Activities

1. Unsubsidized Employment (WEJ)

This category includes full-time or part-time employment where the person's wages are not being subsidized with any government funds. Employment as a member of the Armed Forces on active duty, self-employment, and entry into a registered apprenticeship program are considered to be work activities falling into this category.

2. Subsidized Private Sector Employment (WSU)

This category includes full-time or part-time employment in any private-for-profit or private-non-profit sector job where the person's wages are being subsidized with government funds, including work-study. An example of this type of activity is Grant Diversion, where part or all of the person's grant is diverted to reimburse the employer for some or all of the wages paid to the person. The term "subsidized" does not include tax credits to which the employer may be entitled for employing the person.

3. Subsidized Public Sector Employment (WSP)

This category includes full-time or part-time employment in any public sector job where the person's wages are being subsidized with government funds, including work-study. An example of this type of activity is Grant Diversion, in which part or all of the person's grant is diverted to reimburse the employer for some or all of the wages paid to the person. The term "subsidized" does not include tax credits to which the employer may be entitled for employing the person.

4. Work Experience (WEX)

This category includes public or private sector work situations where the person has the opportunity to acquire the skills and knowledge necessary to perform a broad array of jobs, including learning about appropriate work habits and behaviors. Typically, the person is not paid for participating in a work experience activity, although he or she may receive a needs-based payment to cover the incidental costs of participating.

5. On-the-Job Training (OJT)

This category involves training that is given to a person by an employer in the public or private sector. The training is provided while the person is engaged in productive work with the employer, and provides knowledge or skills essential to the full and adequate performance of the position into which
he/she was hired. The person receives a wage from the employer which is considered to be a training wage.

6. Job Search and Job Readiness Assistance (JBS)

This category includes a variety of activities aimed at assisting the person to locate unsubsidized employment as quickly as possible.

**Job Search activities** include instruction on the effective strategies that can be used by persons in seeking/obtaining their own jobs. Services include, but are not limited to, resume writing, interviewing skills, labor market information, telephone techniques, information on job openings, and job acquisition strategies, as well as the provision of office space and supplies for the job search.

**Job Readiness Assistance** includes instruction in career exploration, instruction on basic workplace expectations and behaviors. Also, substance abuse treatment (JBT) or other barrier removal activities can be considered to be a form of Job Readiness Assistance.

7. Community Service (WEM)

This category includes any work that provides a benefit to the public and is not otherwise described in this list of activity categories. Generally, the person is not paid for his or her work; the person may be asked to locate his or her own community service position, or be placed in an existing position by the program operator. Customers providing care for disabled family members are considered to be participating in this activity.

8. Vocational Education (BEV)

This category includes instruction in an institutional or work-site setting, designed to upgrade a person’s technical skills and information required to perform a broad array of related jobs.

**Non Core TANF Work Activities**

9. Child Care Services (WEC)

This category involves child care provided by a person, for the child (or children) of another person who is participating in a Community Service activity, as defined above.

10. Secondary Education/GED (BED)

This category includes educational instruction provided by a secondary school or an alternative educational program leading to achievement of a
high school diploma or high school equivalency (e.g., GED).

Notes:
- Persons placed in this type of activity must not have received a high school diploma or a certificate of high school equivalency.

- Hours spent by a person in this type of activity are only countable toward the State’s participation rate after the person has participated for 20 hours per week in one of the Core work activities (activity categories numbered 1 through 9 above).

- Teen heads of household or teen spouses who participate in this activity are considered to be meeting the work requirement regardless of how many hours per week they participated and without first participating in a Core work activity, as long as the State considered their level of participation to be “satisfactory.” 80% attendance is considered satisfactory attendance.

11. Education (BER)

This category includes education that is directly related to employment.

Notes:
- Persons placed in this type of activity must not have received a high school diploma or a certificate of high school equivalency.

- Education must be directly related to employment.

- Hours spent by a person in this type of activity are only countable toward the State's participation rate after the person has participated for 20 hours per week in one of the Core work activities (activity categories numbered 1 through 9 above).

- Teen heads of household or teen spouses who participate in this activity are considered to be Countable Participants, without first having participated in a Core work activity.

12. Job Skills Training (IST)

This category includes training which is provided in an institutional or worksite setting and is designed to upgrade a person’s technical skills and information required to perform a specific job.

Note:
- Job Skills Training must be directly related to employment (federal requirement).
- Hours spent by a person in this type of activity are only countable toward the State’s participation rate after the person has participated in one of the Core work activities (those numbered 1 - 9 above).

Participants in work activities or Employment and Training service providers must submit periodic (weekly, bi-weekly or monthly) verification of hourly attendance for each work activity. Local departments may accept attendance verification on locally designed attendance tracking forms, employer letterhead or pay stubs, service provider letterhead or forms or on the attached DHR 1391-A which is a new Time and Attendance form local departments may use at their option. Action transmittal #02-61 describes the attendance verification requirements in more detail.

Local departments must enter, at least monthly, the work activity and attendance information into WO MIS for every customer engaged in one of the federal work activities listed above. Attendance documentation must reflect actual daily attendance for each week in the month, except for unsubsidized employment where weekly or bi-weekly paystubs showing total hours worked are acceptable. The weeks in the month begin with the first Monday in the month and include all Mondays in that month. For example, June 2003 includes five weeks with the first week beginning on June 2nd and the last week beginning on June 30th and ending on July 6th.

Participants in work programs are to be credited with hours of attendance equal to the normal daily maximum hours for the program for days in which the service provider or employer is closed due to a holiday or inclement weather or for days the participant is engaged in jury duty. However, participants engaged in programs through a community college or other educational institution cannot be given credit for attendance during any breaks (e.g. Spring Break) or any period lasting more than 3 days in a week.

In addition to credit for holidays, inclement weather and jury duty as described above, local department Work Opportunities programs may develop policies regarding excused absences and creditable hours of participation similar to those implemented in common personnel practices. Participants may earn limited amounts of creditable hours of participation (no more than 1.5 hours for every 26 hours of participation) to cover absences related to illness, incarceration, court-required appearance, transportation difficulties, child care difficulties or other Good Cause reasons. Local departments that choose to implement procedures related to creditable hours of participation must maintain documentation of creditable hours earned for each participant and attendance hours credited for each participant to ensure that customers are not given excessive credit for attendance.

Participants engaged in Vocational Education, Secondary Education/GED or Education Directly Related to Employment may be given credit for hours of participation in classroom activities as well as homework time. These customers should be credited with 3 hours of attendance for each classroom hour. For example, if a participant in an educational activity attends 2 classes each lasting 1.5 hours, the participant should be given credit for 9 hours of actual attendance that day. Attendance documentation from the educational institution should show how many hours the participant engaged in
classroom activities. Local departments may then multiply this figure by a factor of three and enter the resulting hours into WO MIS.

**ACTION DUE:**

Case managers are currently required to collect work activity and attendance information for all TCA work participants. Local departments are currently required to enter all work activity information into WO MIS. Effective July 1, 2003, local departments must also enter attendance information at least monthly for all TCA recipients engaged in one of the TANF work activities. **Attendance data must be recorded in WO MIS no later than the last day of the following month.**

**WO MIS Procedures**

Attendance information is captured on the WO MIS Attendance Screen.

- From the WO MIS Main Menu select Option 1 – Data Entry Screens.
- From the Data Entry Screens Menu select Option 8 – Attendance Form.
- Enter the participant’s Social Security Number. The Sequence Number, Assistance Unit Number, Client ID and Name (Last, First, MI) will automatically display. Check to ensure you are entering attendance data for the correct participant.
- Section II of the Attendance Screen displays the year and month for which you are viewing or entering attendance data. Make sure you enter the month that corresponds to the documentation from which you are entering the attendance.
- Columns ‘A’ through ‘D’ appear showing all open activities the participant is engaged in for the month selected. The activity codes and subcodes will display automatically. Enter the actual attendance hours for each activity for each week based on the documentation. Totals will automatically be calculated and displayed for each activity at the bottom of each column and for each week in the far right column of the screen.
- After entering all appropriate attendance information proceed to move the cursor to the bottom right of the screen and choose Option 1, 2, 3 or 4 to save the data and continue working in WO MIS.

Local departments can run the WO MIS Missing Attendance Report to identify customers who are recorded in WO MIS as being engaged in a work activity but for whom there has been no attendance entered for the report period. This is a helpful management tool that will assist local departments in meeting this new data entry requirement.

**INQUIRIES**

Please direct questions to Mark Millspaugh at 410.767.8558.

cc:   FIA Management Staff
      Help Desk
      CTF