



Minnesota Department of **Human Services**

Minnesota Work Participation Rate Documentation Review Report

Temporary Assistance for Needy Families (TANF)

Jan.-Mar. 2013 quarter, FFY 2013

May 2014

For questions or feedback on this report, contact:

Paul H. Ramcharit

Minnesota Department of Human Services

Transition Support Quality Services (TSQS)

444 Lafayette Road North

St. Paul, MN 55155

651-431-3877, or email: paul.ramcharit@state.mn.us

This information is available in alternative formats to individuals with disabilities by calling 651-431-3877 (voice), or toll free at 800-366-7895. TTY users can call through Minnesota Relay at 800-627-3529. For Speech-to-Speech, call 877-627-3848.

Terminology Disclaimer

The terminology used to describe people we serve has changed over time. The Minnesota Department of Human Services (DHS) supports the use of "People First" language. Although outmoded and offensive terms might be found within this document, DHS does not endorse these terms.

Table of Contents

EXECUTIVE SUMMARY	3
Section I: Background	4
TANF Work Verification Requirements	4
Minnesota's Verification Process	4
Sample Selection	4
Table 1: Number and Percent of Sampled Cases by County	5
Review Process	5
Section II: Review Findings	7
A. Findings Summary	7
Table 2: Impact of Findings on WPR Reporting	7
Figure 1: Review Results of Sampled Cases (n=68)	8
Table 3: Errors in Incorrect Cases	8
B. Case Error Details	9
Zero Hour Cases (n=18)	9
Table 4: Zero Hour Case Findings and Error Details	9
Scope of Review of Zero Hour Cases	10
Case Management for Correct Zero Hour Cases	10
Table 5: How Correct Zero Hour Cases were handled during the Review Month	10
Length of Time as a Zero Hour Case	10
Table 6: Months as a Zero Hour Case	11
Work Benefit Cases (n=8)	12
Table 7: Work Benefit Case Findings and Error Details	12
MAXIS-Only Cases (n=20)	13
Table 8: MAXIS-Only Case Findings and Error Details	13
ES-Only Cases (n=15)	15
Table 9: ES-Only Case Findings and Error Details	15
MAXIS/ES Cases (n=7)	18
Table 10: MAXIS/ES Case Findings and Error Details	18
C. Impact of Errors on the Work Participation Rate	19
Table 11: Review Determination of Sampled Cases in WPR Report (n=68)	19
Section III: Conclusion	20
Section IV: Attachments	
Attachment A: Review Recommendations	21
Attachment B: Statewide Corrective Action Process	23
Attachment C: MFIP Activity Guide Tip Sheet	25
Attachment D: Tips for Work Benefit (WB) Cases	27

Executive Summary

Temporary Assistance for Needy Families (TANF) regulations included in the 2005 Deficit Reduction Act (DRA) legislation requires states to develop a work verification plan, and monitor participants' engagement in work activities in order to verify hours of participation.

To meet the verification requirement, the Minnesota Department of Human Services (DHS) conducts quarterly documentation reviews of a stratified random sample of 68 cases submitted in federal Work Participation Rate (WPR) data reporting, and publishes quarterly and annual reports of review findings. All 68 cases were included in the WPR denominator because each case included a work eligible individual (WEI). The sample includes 50 cases with at least one hour of core and/or non-core activity (Work Benefit (WB), Maxis-only, Employment Services-only (ES) and MAXIS/ES cases), and 18 cases with zero countable hours in one or more months in the sampled quarter. This is the second report for FFY 2013, covering the Jan. to Mar. 2013 quarter.

Key findings from this quarter's review of the 68 sampled cases are highlighted below:

- Twenty-two of Minnesota's 87 counties (25 percent) were represented in this quarter's sample of 68 cases. Forty-one percent of sampled cases were reported as meeting the required hours of participation in federal WPR reporting (included in the numerator value of the WPR). The remaining 59 percent were reported as not meeting the required hours of participation.
- The documentation review found that, of the 68 cases sampled, 42 cases (62 percent) were correct for documentation of hours and had no error findings.
- Among the remaining 26 cases (38 percent) that had at least one documentation error:
 - Twenty cases (29 percent) had errors that did not have an impact on the federal work participation rate, but had discrepancies in the number of hours submitted in federal reporting.
 - Five cases (7 percent) should not have been reported as meeting the required hours of participation (did not have enough documented hours).
 - One case (2 percent) reported as not meeting WPR should have been reported as meeting the required hours of participation (had enough documented hours).
- Of the 18 zero hour cases, 16 had no documentation errors, but remained zero hours ranging from one to 16 months; one case has been zero hours for more than a year. For the two cases with errors, one case was reported as zero hours but the review found 33 hours that should have been reported, and in the other case, the county agency could not locate the case file for review.

DHS continues to disseminate information (manuals, trainings, reports and presentations) to assist county financial workers and employment services workers to correctly document and report participant activities. Each quarter, county-specific reports are provided on case findings along with tip sheets and other resources to coach workers on error findings to improve overall documentation and reporting.

Section I: Background

Temporary Assistance for Needy Families Work Verification Requirements

The Temporary Assistance for Needy Families (TANF) Work Participation Rate (WPR) is the federally mandated work performance requirement for states that have a TANF program. Minnesota's TANF program is the Minnesota Family Investment Program (MFIP). The WPR was established under the federal Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996, along with penalties and incentives for states. The federal Deficit Reduction Act of 2005 (DRA), also known as TANF Reauthorization, included changes to TANF Work Participation Rate rules.

TANF regulations require states to develop a work verification plan, and monitor participants' engagement in work activities to verify hours of participation.¹

Minnesota's Verification Process

The Minnesota Department of Human Services, Transition Support Quality Services (TSQS) Division, is responsible for monitoring and reviewing statewide random samples of TANF cases submitted in federal WPR reporting each quarter.

Refer to [Bulletin #12-03-01](#), "DHS Changes Statewide Reviews of Temporary Assistance for Needy Families (TANF) Cases," April 27, 2012, for more information on the review process.

"[The MFIP Employment Services Manual](#)"² (MFIP ES Manual) includes the MFIP Activity Daily Supervision, Documentation and Verification Guide in Appendix E. The guide shows documentation requirements for both the MAXIS and Employment Services (ES) activities. The review process uses this primary resource as guidance in determining if case file documentation and verification meets federal requirements. The review examines financial and employment services files, and supporting documentation of hours for cases in the selected review month.

Sample Selection

In the Jan.-Mar. 2013 quarter, DHS staff reviewed a statewide stratified random sample of 68 TANF and Work Benefit (WB) cases that were reported in the federal WPR denominator in the review quarter. The sample was stratified to include 50 cases with at least one hour of core and/or non-core activity (eight of which are WB cases), and 18 cases with zero countable hours in one or more months in the review quarter.

Twenty-two counties were represented in the sample. The number of sampled cases by county is shown in Table 1.

¹ The specific regulation pertaining to the documentation auditing process is 45 CFR 261.62 (b)(5).

² Available at: http://www.dhs.state.mn.us/main/id_016957.

Table 1: Number and Percent of Sampled Cases by County

County	Cases	Percent	County	Cases	Percent
Anoka	4	6%	Polk	1	1%
Beltrami	3	4%	Pope	1	1%
Chisago	1	1%	Ramsey	17	25%
Clay	1	1%	Rice	1	1%
Dakota	4	6%	St. Louis	2	3%
Goodhue	1	1%	Scott	1	1%
Hennepin	18	26%	Sibley	1	1%
Koochiching	1	1%	Todd	1	1%
Nicollet	3	4%	Watonwan	1	1%
Nobles	1	1%	Wright	2	3%
Olmsted	2	3%	Yellow Medicine	1	1%
Total					
			22 counties	68	100%

Review Process

Reviewers copied file data onsite in Hennepin and Ramsey counties, while the other counties in the sample sent their TANF financial and employment services (ES) case files to DHS.

During the review process, reviewers compared documentation in the case file for participant's hours against what was submitted in federal TANF reports (based on data from MAXIS³ and Workforce One⁴). A case has no documentation error if all countable activities for the review month are correctly documented and reported. If a case has both MAXIS and ES countable activities for the review month, both MAXIS and ES must have the correct documentation to substantiate the reported hours.

After case reviews are completed, a detailed report is generated for each case and sent to the respective county. The report consists of a:

- Cover letter and review findings information sheet providing definitions and information on the summary and individual reports in the packet
- County summary (MAXIS summary, Employment Services summary, and Employment Services summary by provider)
- Case list with the individual review results

³ The MAXIS system is used by county financial assistance staff to enter MFIP eligibility information, including earned income and the number of hours of paid employment. The MAXIS system is also used by county financial assistance staff to enter eligibility information, including income and the projected number of paid employment hours for the (Minnesota) Work Benefit Program (WB), which began Oct. 1, 2009.

⁴ Minnesota Workforce One (WF1) is a case management system used to track client activity in state-funded employment and training programs and many locally funded programs. The system is administered by the Minnesota Department of Employment and Economic Development (DEED) and used by state, county and private nonprofit service providers. The WF1 system is used by MFIP employment services providers to record participant employment services activity, including recording the hours of participation in non-paid employment services activities, in-kind work and school attendance for teen parents.

- Detailed individual findings report for each case reviewed (MAXIS information and Employment Services information) that should be placed in each case file.

County agency staff are encouraged to examine the assessment and final determination of cases, and share the results with financial workers and the respective employment services provider. County agencies are encouraged to respond with challenges or questions regarding review findings. All feedback is reviewed; the final determination of each case is validated before the data is aggregated and analyzed.

Section II: Review Findings

A. Findings Summary

This section discusses the cohort of cases sampled, and errors associated with an incorrect case. At the findings level, a case is counted as incorrect only once, even if there are more than one MAXIS and/or ES errors. As such, the type of error(s) that led to a determination that a case is incorrect could be MAXIS, ES or both.

Of the 68 cases in the sample, 42 (62 percent) were correct; meeting documentation requirements; 26 (38 percent) were incorrect with at least one error finding.

Among the 26 cases that had at least one documentation error, six cases had errors that would have changed their status of meeting or not meeting required hours of participation. Details are noted below and summarized in Table 2:

- Twenty cases (29 percent) had errors that did not have an impact on the federal work participation rate, but had discrepancies in the number of hours submitted in federal reporting.
- Five cases (7 percent) should not have been reported as meeting required hours of participation (did not have enough documented hours).
- One case (2 percent) reported as not meeting WPR should have been reported as meeting required hours of participation (had enough documented hours).

Table 2: Impact of Findings on WPR Reporting

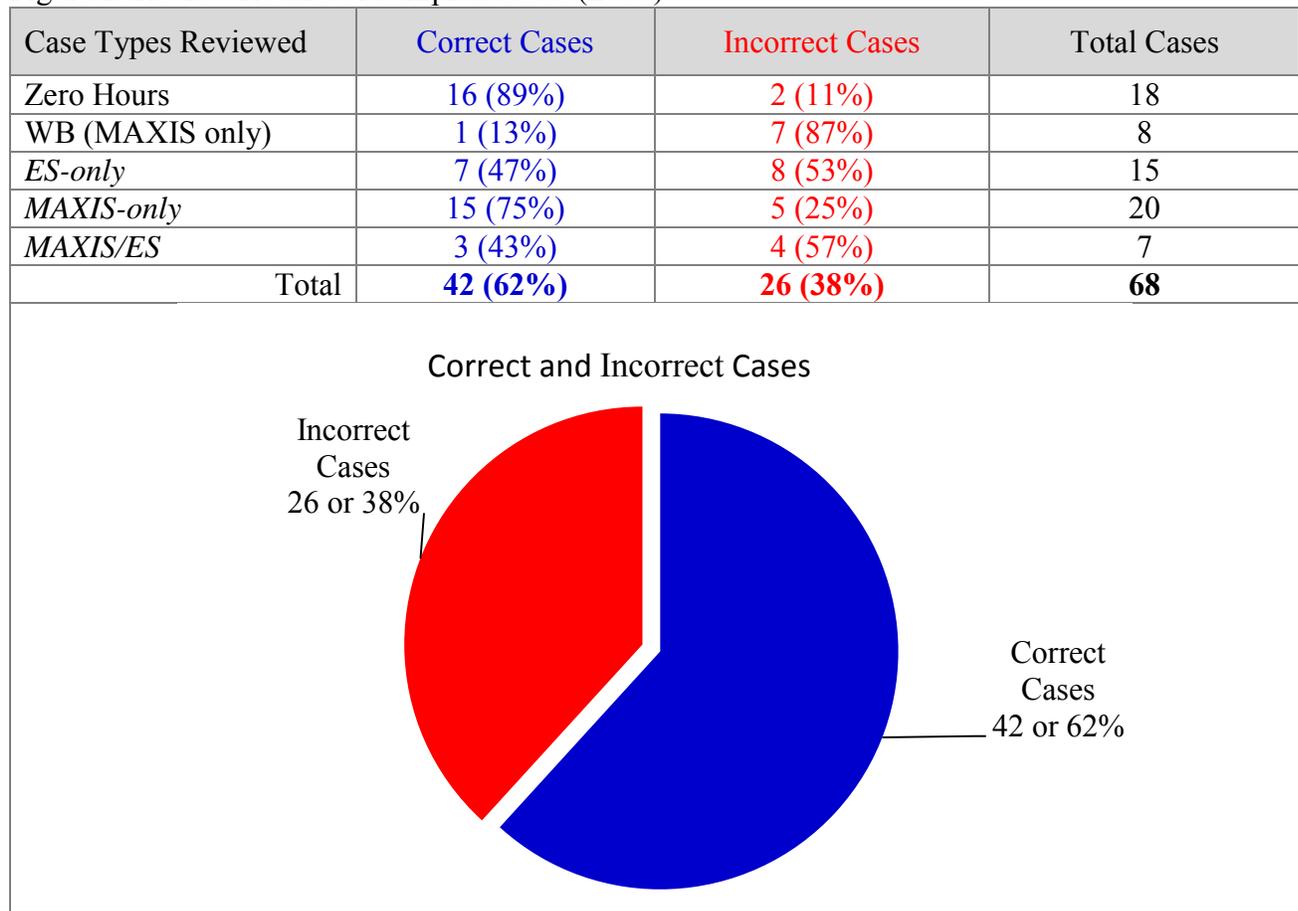
Impact on WPR Reporting	Percent
Correct Findings Hours correctly reported (42 cases or 62%)	62%
Incorrect Findings Hours reported were incorrect but not impact the WPR (20 cases or 29%)	38%
Hours reported as meeting required hours of participation, but did not (5 cases or 7%)	
Hours reported as not meeting required hours of participation, but did (1 case or 2%)	
Total (68 cases)	100%

Among the case types reviewed for documentation in the sample:

- Sixteen of 18 (89 percent) of the zero hour cases were correct
- Seven of eight (88 percent) of the WB cases were incorrect
- Eight of 15 (53 percent) of the ES-only cases were incorrect
- Fifteen of 20 (75 percent) of the MAXIS-only cases were correct, and
- Four of seven (57 percent) of the MAXIS/ES cases were correct.

The review results by case type are summarized and illustrated in Figure 1:

Figure 1: Review Results of Sampled Cases (n=68)



Incorrect cases could have either MAXIS or ES errors, or both. The 26 incorrect cases as shown in Figure 1 had a total of 39 errors; 21 errors were ES and 18 were MAXIS. Errors by case types are shown in Table 3:

Table 3: Errors in Incorrect Cases

Case Types	Incorrect Cases	MAXIS Errors	ES Errors
Zero Hours	2	3	0
WB	7	8	0
ES-only	8	0	14
MAXIS-only	5	5	0
MAXIS/ES ^a	4	2	7
Total	26	18	21

^a Of the four incorrect MAXIS/ES cases, the first had one MAXIS and two ES errors, the second had two ES errors, the third had three ES errors and the fourth had one MAXIS error.

B. Case Error Details

Zero Hour Cases (n=18)

The sample included 18 non-countable (zero) WPR hour cases reported under TANF federal reporting, considered non-MAXIS/non-ES activity cases for this review. The zero hour cases are in the denominator of the federal WPR, even though they have no countable WPR hours for the review month. Cases considered zero countable WPR hours have no countable hours reported for the review month, but can have non-countable hours such as job search hours that are reported as “other” work activities (the total hours are less than TANF required hours), and cases that only have assessment and other activities reported under the “other activity” category.

Because the review focus is to verify documentation of federally reported WPR hours, most of the zero hour cases are considered correct for the review month for the purpose of this review. However, reviewers found MAXIS and ES case management problems for some cases. These problems included failure of financial worker to do an ES referral or doing it much later, lack of timely assessment for Family Stabilization Services (FSS), failure to sanction timely, as well as other case management issues.

As shown in Table 4, 16 of the 18 zero hour cases had no documentation errors. Of the two zero hour cases with documentation errors, one case had 33 documented activity hours in the case file but not entered in MAXIS, and for the second, the county agency could not locate the file for review.

Table 4: Zero Hour Case Findings and Error Details

Case Findings

16 (89 percent) cases had correct findings

Two (11 percent) cases had incorrect findings with two errors.

Error Details

Case one—Zero hours reported, but 33 hours were verified. There were no counted hours reported for WPR, but the review found 33 countable hours on file that were not reported on MAXIS for the review month of 2/13. The participant had been self-employed since 5/12, and an average had been computed to calculate his income starting with that month. However, the participant claimed \$0 income in the months 1/13-4/13 (3/13 there was no MFIP eligibility). Instead of entering \$0 into the rolling average, the worker entered \$0 on the BUSI panel. The participant was still self-employed (per MAXIS case notes), and the zero hour months should have been calculated into the rolling average. The MAXIS budget was prospective for 4/13, however, for federal reporting, if there is verified data in the retro panel, these are the hours that are reported. The worker should have continued the rolling average and put that information on the 4/13 footer month panel. Using the rolling average worksheet, the hours were calculated to be 33 for the review month of 2/13.

Case two—Zero hours were reported during the review month of 1/13, but no ES case was created for the participant. This case originally opened in 3/12, and the participant was on ‘child <1 exemption’ from 3/12 through 7/12. The participant was never referred to ES before or after the exemption ended, and there was still no active ES case for this participant as of the review month even though the case is active on MFIP. A case note on 9-7-12 states that a referral will be sent, but there is no record that this was done.

Scope of Review of Zero Hour Cases

The main scope of documentation reviews is to focus on the review month and report findings about that month. However, to get a count of consecutive zero hour months as shown in Table 6, the review examined the months with zero hours for the entire MFIP sequence (from application to case closing), providing an overall summary of what was observed with case management for these cases. Although some cases were handled correctly in the review month, that may or may not be true for the other months in zero hour status for a given case.

Case Management for Correct Zero Hour Cases

Even though 16 zero hour cases had no documentation errors, the review found 63 percent were handled correctly and 37 percent incorrectly by MAXIS and ES workers (although this did not constitute a documentation error as shown in Table 5):

Table 5: How Correct Zero Hour Cases were Handled During the Review Month

Handled Correctly		Review Month Description of Case Management
10 (63 percent)	MAXIS (2)	<ul style="list-style-type: none"> • County/ES transfer in progress (review month only) • Child under age one exemption in effect for review month
	ES (8)	<ul style="list-style-type: none"> • Case in process of being, or is currently, sanctioned for the review month (5) • First month on assistance and no work activity assigned—review month (2) • Child under age one exemption in effect for review month (1)
Handled Incorrectly		
6 (37 percent)	MAXIS (1)	<ul style="list-style-type: none"> • Failure to refer participant to an ES provider (1)
	ES (5)	<ul style="list-style-type: none"> • Activity open, but no counted hours tracked (2) • Failure to assess for FSS eligibility (3)

Length of Time as a Zero Hour Case

The documentation review identified zero hour cases that remained a zero hour status for several months. For the zero hour cases with no documentation errors (n=16), the cases remained zero hour ranging from one to 16 months. One case has been zero hours for more than a year. A distribution is presented in Table 6. A zero hour case can have non-countable hours which reflects some engagement in activities such as assessment, social services, etc. As shown in Table 6, 25 percent of the 16 zero hour cases with no documentation errors had no engagement. No engagement means no countable or non-countable hours coded.

Table 6: Months as a Zero Hour Case

Months with Zero Hours	Cases	Type of Engagement	Cases	Avg. Months with Non-countable Hours
1-5 months	10 (63%)	No engagement	5	-
		Some engagement	5	2.8
6-12 months	5 (31%)	No engagement	-	-
		Some engagement	5	1.6
13-16 months	1 (6%)	No engagement	-	-
		Some engagement	1	7
Total	16	No engagement	5 (31%) *	-
		Some engagement	11 (69%)	2.6

* The five cases with no engagement were zero hour cases ranging from one month to three, averaging two months.

Work Benefit Cases (n=8)

The Work Benefit program (WB) is a monthly cash benefit for families who have exited the Diversionary Work Program (DWP) or MFIP and are working a required number of hours with income below 200 percent of the federal poverty guidelines (FPG). To maintain WB eligibility, single caregivers with a child under age 6 must be employed at least 87 hours per month, or 130 hours per month with a child(ren) age 6 or older. In two-parent families, at least one of the parents must be employed 130 hours per month. As a WB reference resource, see Attachment D: Tips for Work Benefit (WB) Cases. WB cases are all MAXIS cases, in the numerator of WPR reporting.

Of the eight WB cases in the sample, seven had errors that resulted in a discrepancy of hours submitted in federal reporting, but the errors did not have a direct impact on the work participation rate. One WB case was found to be correct. The review result and error details for WB cases are summarized in Table 7:

Table 7: Work Benefit Case Findings and Error Details

Case Findings

- 1 (13 percent) had correct findings
- 7 (87 percent) had incorrect findings with 8 MAXIS errors.

Error Details

Case one—134 hours were reported, but 148 hours were verified. Two paystubs found in case file showed total hours of 148, not 134 as recorded in MAXIS. This was a WPR numerator case; the change would not have affected its numerator status.

Case two—182 hours were reported, but 132 hours were verified. The financial worker entered both the income and hours from a third paycheck during the review month. WB policy states that only income should be entered from a third paycheck, not the hours. This was a WPR numerator case; the change would not have affected its numerator status.

Case three—160 hours were reported, but 165 hours were verified. The financial worker correctly budgeted the earned income from the paychecks, but did not enter the correct hours on the JOBS panel. This was a WPR numerator case; the change would not have affected its numerator status.

Case four—180 hours were reported, but 171 were verified. WB policy states that the most current actual income/hours should be used to calculate eligibility. The review found more recent paystubs that should have been used to calculate the WB budget. This was a WPR numerator case; the change would not have affected its numerator status.

Case five—216 hours were reported, but 119 were verified. Using the most recent income and hours on file, the review calculated 119 hours. It is not clear why 216 hours were entered by the worker. This was a WPR numerator case; the change would not have affected its numerator status.

Case 6—146 hours were reported, but 140 were verified. The financial worker did not use the most current actual income/hours to calculate WB eligibility. This was a WPR numerator case; the change would not have affected its numerator status.

Table 7: Work Benefit Case Findings and Error Details

Case 7—311 hours were reported for the review month of 3/13, but 150 were verified. The participant had two jobs and two errors were found. In the first, the county agency received a stop-work verification on 4/13. The participant's last day of employment was 01/13 and received the last check 1/13. The worker created a STWK (stop work) panel and the JOBS panel for this job in the footer month of 05/13. However, the worker should have created the STWK panel in the footer month of 1/13 and updated the JOBS panel. Because the STWK and JOBS panels were not updated in the footer month 1/13, there were 151 hours from this job incorrectly reported for WPR for 3/13. For the second job, the financial worker did not calculate the projected income and hours using the most current paystub on file at the time the JOBS panel was updated. This was a WPR numerator case; the change would not have affected its numerator status.

MAXIS-only Cases (n=20)

MAXIS-only cases are those with paid employment with at least one countable hour for the WPR. Of the 68 cases, 20 were MAXIS-only cases (29 percent). Fifteen of the 20 were correct. Among the five cases with documentation errors:

- Four had errors that resulted in a discrepancy of hours submitted in federal reporting, but the errors did not have a direct impact on the work participation rate.
- One should have been reported as meeting the required hours of participation (had enough hours to meet required number of participation hours).

The review results and error details for MAXIS-only cases are summarized in Table 8.

Table 8: MAXIS-only Case Findings and Error Details

Case Findings

15 (75 percent) had correct findings

5 (25 percent) had incorrect findings, with 5 MAXIS errors.

Error Details

Case one—48 hours were reported, but 160 were verified. For the review month 2/13, there were 48 prospective hours reported for WPR. Prospective hours were reported because the participant's case was closed early on 4/13 per participant's request. Participant reapplied mid 4/13. A 2/13 Household Report Form (HRF) was not done. As a result, the 2/13 prospective hours were reported for WPR. The worker noted receiving an employment verification form (EVF) that stated the participant would be working 40 hours per week. It is not clear why this information was not used to complete the prospective side of the JOBS panel. The worker instead used the income from 12/12 which was the first month of work and had less hours than the EVF stated she would be working. The prospective panel should have been updated with the information from the EVF. Had these hours been recorded, this case would have met the required hours of participation in WPR.

Case two—160 hours were reported, but 149 were verified. The difference in hours was the result of a discrepancy between the hours listed on the paystubs and those entered into MAXIS. There were two pay dates for the review month: 03/06/13 showed 69.53 hours and 03/19/13 showed 79.10 hours. Hours for the review month totaled 148.63, or 149 after rounding up. This was a WPR numerator case; the change would not have affected its

Table 8: MAXIS-only Case Findings and Error Details

numerator status.

Case three—94 hours were reported, but 93 were verified. The difference is the result of an error in rounding on the part of the financial worker. Per the MAXIS Temp Manual, TE02.08.170, for EACH job, the financial worker should total the number of hours of paid employment in a month and round to the nearest whole number. In this case, the worker did not have to determine whether to round up or down as the total number of work hours in the review month equaled a whole number ($34.50 + 58.50 = 93$ hours). It is possible that the worker decided to perform rounding for each pay date; however, the instructions are to add all hours for the month first and then round up or down. This was a WPR numerator case; the change would not have affected its numerator status.

Case four—22 hours were reported, but 25 were verified. The difference is the result of an error in calculating the hours worked. It is not clear how the hours were calculated. The total hours for the review month for the two paystubs were $18.05 + 7.36 = 25.41$, or 25 hours after rounding down. This case was not in the numerator value and the change would not have affected the WPR.

Case five—eight hours were reported, but seven hours were verified. The participant had begun working and had received a check on 1/31/2013. The information had the amount of the check as \$57.26, but did not list the hours. The review used the amount earned per hour from the information on the employment verification form. $\$57.26/7.75 = 7.39$ hours, which rounds down to 7 hours per the rounding policy. This case was not in the numerator value and the change would not have affected the WPR.

ES-only Cases (n=15)

There were 15 ES-only cases in the sample. Eight of the 15 cases had documentation errors. Among the eight cases with documentation errors:

- Two should not have been reported as meeting the required hours of participation (did not have the required number of verifiable participation hours)
- Six had errors, but the errors had no direct impact on the work participation rate, but resulted in a discrepancy of hours submitted in federal reporting.

The review results and error details for ES-only cases are summarized in Table 9.

Table 9: ES-only Case Findings and Error Details

Case Findings

7 (47 percent) had correct findings

8 (53 percent) had incorrect findings, with 14 ES errors.

Error Details

Case one (one ES error)—137 hours were reported, but 66 verified. There were 137 training hours reported for WPR. The participant was attending a technical college and taking 13 credits. Per the class statement, the review calculated class time each week to be 14 hours. A school statement on file recommended study time for this program as eight hours per week. Per federal requirements, up to one hour of unsupervised study time per class hour is allowed; since the school recommends eight hours, only eight hours can be allowed each week for unsupervised study time. The logs were completed and signed. However, the actual class times were not listed. The participant listed 8-2 p.m. each day. Per federal requirements, each day needs to be listed with the actual time attended. Per the class schedule, it is not 8-2 p.m. each day. Also, in weeks one and three, there were five and 33 hours coded on WF1, respectively, but there were no scheduled classes for these days. The revised calculation would allow for a total of 66 hours of school and study time for the review month. This is 14 hours of class and eight hours of study time for each of the three school weeks during the review month. Had the hours been correctly recorded, this case would not have been reported as meeting the required hours of participation in the WPR.

Case two (two ES errors)—87 hours reported, but 76 hours verified. There were 87 hours of job search (including eight holiday and three excused hours) reported. The review did not accept the holiday or excused hour credits. The participant was not eligible for holiday hours as she had recorded eight hours of Job search activity and these hours were already being reported under the job search activity. Also, when allowing the holiday credit, the ES worker should only code the number of hours that the participant is required to do according to the employment plan (EP) in effect that month; the participant's EP indicated five hours/day for a total of 25 hours/week of job search activity. In addition, the three excused hours were not accepted, as there was no documentation in WF1 case notes or in the paper file to explain the reason for allowing these hours. Information on the correct use of holiday/excused hours is covered in the ES Manual, 9.48. Had the hours been correctly recorded, this case would not have been reported as meeting the required hours of participation in WPR.

Case three (one ES error)—94 hours were reported, but 88 verified. The ES worker reported a total of 24 hours of study time during a week (which included both supervised and unsupervised) in the review month; however, class did not meet on the Martin Luther King holiday so only 18

Table 9: ES-only Case Findings and Error Details

hours of study time could be allowed for that week, not 24. Even with the reduction of six hours, this case would still meet the required hours of participation for WPR.

Case four (two ES errors)—160 hours reported, but 16 hours verified. The 160 hours were for training (13-24 months) activity. The participant was attending school to obtain a medical assisting degree. Spring semester consisted of classes and an unpaid internship. The review allowed the 16 classroom hours coded under the training activity. However, the 28 hours of internship should have been coded under 'Unpaid Work Experience' activity, not training activity. In addition, there was no documentation to substantiate the 128 study hours reported. To count hours of study time, there must be a statement from the school or instructor that specifies the amount of study time that is required or recommended in order to make satisfactory progress. With such a statement, the worker can allow up to one hour of unsupervised study time per class hour, provided it does not exceed the specified number of hours. Additional study time must be supervised. The total unsupervised and supervised study time cannot exceed the amount of study time required or recommended by the school or instructor. This case was not in the numerator value of WPR (non-core activity hours); the change would only have impacted the hours reported, not WPR.

Case five (one ES error)—98 hours reported, but 90 hours verified. There were 90 hours of training activity and eight holiday hours reported for the review month. The eight holiday hours were cited as an error as they were used incorrectly. On the day that the holiday occurred, the participant did not have classes. The participant did have an online course, but there were no designated days for this; no documentation of activity hours for this class. To be eligible for holiday hours, participant should have been scheduled to participate in training activities. This case was not in the numerator of the WPR; the change would only have impacted the hours reported, not WPR.

Case six (three ES errors)—45 hours reported, but 42 hours verified. There were 45 hours of training (13-24 months) activity reported for the review month. In week one, two hours were coded in WF1; the review did not accept these hours. The only class for this day was psychology, the documentation was inadequate as it did not specify the classroom hours of attendance. In week two, 24 hours were coded for nursing assistant clinical; these hours were verified. In week three, four hours were coded; the review did not accept these hours for the same reason as week one. In week four, four hours were coded in WF1 for a communications class; the review verified eight hours (four for classroom and four for unsupervised study). It appears that the ES worker allowed for classroom attendance hours only. In week five, nine hours were coded for a communications and algebra class; the review verified 10 hours (five for classroom and five for unsupervised study). Documentation from the instructor for both the classroom and recommended study time was found in the case file. This appears to have been a simple math error. In week five, there were two additional hours coded for 3/31, but this was a Sunday. This case was not in the numerator of the WPR; the change would only have impacted the hours reported, not WPR.

Case seven (three ES errors)—64 hours reported, but 36 verified. The 64 hours were for a training activity. The participant had classes scheduled for Tuesday, Wednesday and Saturday. The reviewer did not allow for hours on Saturdays, as the documentation submitted by the participant, although it had the signature of the instructor, did not list the classroom/online hours

Table 9: ES-only Case Findings and Error Details

of participation. The review also did not allow for hours recorded on Mondays and Thursdays as there was no explanation for what these hours represented. What remained that was accepted by the reviewer were the classroom hours for the classes on Tuesday and Wednesday. *Clinical documentation*: Hours reported for clinicals should be identified on the activity log and need a signature of a responsible individual (could be a person from the school or the work site supervisor). These hours are reported as “unpaid work experience” activity, not training activity. *Study time documentation*: To count study time hours, there must be a statement from the school or instructor which specifies the amount of study time that is required in order to complete the education program. Up to one hour of unsupervised study time per class hour is allowed, provided it does not exceed the specified number of hours. Any additional study time must be supervised. The reviewer did not find any study time documentation in the ES case file. This case was not in the numerator of the WPR; the change would only have impacted the hours reported, not WPR.

Case eight (one ES error)—four hours were reported, but zero hours verified. The ES worker received a job search activity log and incorrectly coded four hours as “job skills training directly related to employment.” The four hours of activity on the job search log were interviews and should have been coded under “job search” hours. The participant's employment plan listed job search as an activity (not job skills), and the case notes stated the hours on the job log are job search. It is unclear during the review why job search hours were being coded as job skills. This case was not in the numerator of the WPR; the change would only have impacted the hours reported, not WPR.

MAXIS/ES Cases (n=7)

There were seven MAXIS/ES cases in the sample. Three had no errors. Of the four cases with documentation errors:

- Three should not have been reported as meeting the required hours of participation (did not have the required number of verified participation hours)
- One case did not have a direct impact on the WPR, but resulted in a discrepancy of hours submitted in federal reporting.

The review results and error details for MAXIS/ES cases are summarized in Table 10.

Table 10: MAXIS/ES Case Findings and Error Details

Case Findings

3 (43 percent) had correct findings

4 (57 percent) had incorrect findings, with seven ES and two MAXIS errors

Error Details

Case one (three ES errors)—87 hours were reported (31 MAXIS; 56 ES), but 31 verified. All 31 MAXIS hours were verified. Of the 56 ES hours reported, zero hours were verified. The ES reported hours were unaccepted because the job search logs did not contain any documentation of a weekly check-in. In the second error, the location of the job contacts is also not listed on the job search log; the ES worker allowed three hours for job contacts when the location was not documented. In addition, eight holiday hours were reported, but according to the employment plan, the participant is only required to do five hours of job search per week, therefore, only five holiday hours can be used per day. This case was reported as meeting the WPR, but should not have been according to documentation in the case file.

Case two (two ES errors)—87 hours were reported (18 MAXIS, six ES), but 81 hours verified. The 81 MAXIS hours were verified. Of the six ES job search hours reported, zero hours were verified as they were not properly documented. The “For Agency Use Only” section of the Job Search activity log for week one was left unanswered for the weekly check-in questions, and checked "No" regarding the bi-weekly job contact. For week two, both the weekly check-in and bi-weekly job contact areas were left unanswered. There was also no evidence of a bi-weekly job contact (on-line application receipt, business card, etc.) in the case file. The WF1 case notes had an entry indicating the receipt of two job logs, but there was no indication that a weekly check-in had occurred. This case was reported as meeting the WPR, but should not have been according to documentation in the case file.

Case three (two ES and one MAXIS errors)—87 hours were reported (75 MAXIS, 12 ES), but 77 hours verified. In addition to the 75 MAXIS hours reported, two additional hours were found in case file. The hours were not computed correctly. Of the 12 ES hours reported, zero hours were verified. None of the 12 hours reported for WPR can be allowed as the job search logs were not complete. To call a job search log complete, there needs to be at least one job contact verified every two weeks, and none of the logs indicated that verification was provided, and there was nothing in the case notes. Also, two of the three logs had a check-in indicated on the log or in case notes, but the third log did not have a check-in method noted. The section on the back side of the job search log should be used to indicate the date of the check-in, the method and how the bi-weekly job contact was verified. This case was reported as meeting the WPR, but should not have been according to documentation in the case file.

Table 10: MAXIS/ES Case Findings and Error Details

Case four (one MAXIS error)—36 hours were reported (all 36 hours were MAXIS), but 62 hours verified. There were 36 hours of paid employment reported. A fifth paycheck for an additional 16.5 hours worked was on file but not entered in MAXIS. It was not clear how the 36 hours were calculated from the four checks entered in MAXIS totaling 42.25 hours and with the additional check of 16.5 hours, should total 61.75 or 62 total hours. Even with the additional hours, there would not have been enough to meet the required hours of participation.

C. Impact of Errors on the Work Participation Rate

This review findings section provides a final determination summary of the case WPR status based on review findings. All 68 cases were included in the federal work participation rate denominator because each case included a work eligible individual (WEI). Cases successfully meeting the required hours of participation were included in the numerator value of the WPR. A summary is provided in Table 11:

Table 11: Review Determination of Sampled Cases in the Work Participation Rate (n=68)

Cases Reported as Meeting the Required Hours of Participation (n=28)	Cases
No documentation errors	13
Documentation errors (but still met required hours of participation)	10
Documentation errors (did not have the required number of verifiable participation hours)	5
Cases Reported as Not Meeting the Required Hours of Participation (n=40)	
No documentation errors	29
Documentation errors (but still did not meet the required hours of participation)	10
Documentation errors (met the required number of participation hours)	1
Total	68

Section III: Conclusion

The TANF Work Participation Rate documentation review process continues to help clarify and refine policies and procedures for reporting and documenting work activities. This information, along with the statewide corrective action process, shows the importance of accurate, detailed case management.

In this quarter's sample of 68 cases reviewed, 62 percent (n=42) were correct for verification of hours reported in the WPR for the review month. These cases had no documentation errors. Twenty-nine percent (n=20) had errors, but the errors did not have an impact on the federal work participation rate, but had discrepancies in the number of hours submitted in federal reporting. Seven percent (n=5) had errors and should not have been reported as meeting the required hours of participation (did not have enough documented hours). One percent (n=1) was reported as not meeting WPR, but should have been reported as meeting required hours of participation (had enough documented hours).

WB cases had the highest rate of errors (88 percent), followed by MAXIS/ES (57 percent) and ES cases (53 percent). A common error was the discrepancy between what is recorded in MAXIS or WF1 systems and most current income and hours on file. There were also a few errors related to the application of policy. Addressing these errors can significantly reduce documentation errors.

County financial and ES workers are encouraged to review the specific causes of errors noted in this report and implement the recommendations in Attachments A-D. In addition, collaborative efforts and stronger communication among MAXIS and ES supervisors and workers, and between county financial and ES workers can go a long way to address common errors, and improve overall documentation review results and work participation rate reporting.

Section IV: Attachments

Attachment A: Review Recommendations

Based on the MAXIS and ES errors found during documentation reviews, DHS staff provides the following suggestions for county financial and employment services workers:

MAXIS:

- **Pay Stubs.** Pay close attention to information on pay stubs and only record income and hours supported with actual documentation (pay stubs, employer statement, etc.) in the month payment was received.

- **Document Work Benefit (WB) projected income determination.** Single parent WB cases are included in the TANF Work Participation Rate, therefore, also on TANF Work Participation Rate documentation reviews. Use the most current income/hours on file at the time of WB approval, and clearly document what was used for the calculation. If new information becomes available, reassess WB eligibility.

Use the “Combined Manual” and the “Tips for Work Benefit Cases” document (Attachment D) developed from TANF Work Participation Rate documentation review results, available at:

http://www.dhs.state.mn.us/main/id_016956
http://www.dhs.state.mn.us/dhs16_166327.pdf

Employment Services:

- **Require participants to provide school statement about recommended amount of study time.** Job counselors must only record documented study time hours when the appropriate documentation is provided by the school.

- **Use the DHS school verification form.** DHS-2883 MDHS Request for Verification of School Attendance/Progress - English - 2-09
<https://edocs.dhs.state.mn.us/lfserver/Legacy/DHS-2883-ENG>

- **Do weekly check-in meetings and bi-weekly verification of one job contact.** Document in case notes that a weekly check-in meeting occurred. Do a bi-weekly verification of at least one job contact listed on the Job Search Activity Log and update the form accordingly.

- **Motivate participants to provide documentation as scheduled.** It is important that participants provide timely activity documentation. Documenting activities and timely submission are transferrable skills an employer may ask an employment counselor when acting as a reference for participants. Train participants, and use the Notice of Intent to Sanction (NOITS) tool when appropriate.

MAXIS/Employment Services:

- **Review the manual for policy information.** Review the appropriate manual to clarify the correct policy and apply it to a case.

MAXIS examples:

- WB – use recent income; do not average income and/or hours; WB requires participants’ paid hours are a minimum of 87 (youngest child less than six years), or 130 hours (youngest child age 6 or older), per month.

- Self employment – review the Self-employment Handbook (link below) and the policy manuals.

http://www.dhs.state.mn.us/dhs16_144585.pdf

ES examples:

- Record hours in Workforce One and under the correct activity.

- **Update county/provider forms and get appropriate signatures.** County and provider forms should contain all the needed data fields to ensure compliance with TANF documentation requirements. The form may need the clients’, responsible individuals’ and/or job counselors’ signatures.

- Review DWP/MFIP Tip Sheets available on CountyLink:

http://www.dhs.state.mn.us/main/idcplg?IdcService=GET_DYNAMIC_CONVERSION&RevisionSelectionMethod=LatestReleased&dDocName=dhs16_161174#

Other Recommendations

Corrective Action

DHS staff recommend that all county agencies and ES providers review the TANF Work Participation Rate Documentation Reviews – Statewide Corrective Action Process, available as Attachment B.

Training Opportunities

- Attend state presentations and training sessions on the WPR, documentation and verification requirements, and DRA updates.

- County agencies and ES providers with incorrect review findings are encouraged to work with the DHS Transition to Economic Stability (TES) consultants to obtain supplemental instructions, and technical assistance. Use the central email address to send in non-policy inquiries about DWP, MFIP and WB to TES: dhs.dwp-mfip@state.mn.us.

Examples of inquiries appropriate to send to the new email address include:

- Questions about allocations and allowable expenditures
- Questions about training or requests to provide training
- Questions about performance measures or documentation/verification requirements
- Process questions (i.e., paperwork for an Injury Protection Program claim)
- Unsure whether a question needs to be submitted through Policy Quest.

Questions about contracts should continue to be directed to the appropriate contract manager. Client-specific policy questions should continue to be submitted through Policy Quest. MAXIS and WF1 questions should be sent to the respective Help Desk. If unclear about where a question should be directed, use the above new email address and staff will redirect as appropriate.

Invitation to Comment on this Report

DHS invites county agency staff and ES providers to comment on this report, and provide ideas of what additional information they would like to see in future reports. Send comments and/or ideas by email to paul.ramcharit@state.mn.us.

Attachment B: Statewide Corrective Action Process

DHS staff recommends that all county agency staff and ES providers take the following actions to improve documentation performance for TANF Work Participation Rate (WPR) Documentation Reviews.

Recommended actions:

- Use the MFIP Activity Guide in Appendix E of the MFIP ES Manual. This document is used for the TANF Work Participation Rate documentation reviews and will help workers understand documentation requirements, and determine if documentation is complete.
- Review individual case finding results with financial and ES staff who have the case, and ensure that each result gets filed in the appropriate county financial and employment services provider case file.
- Review this entire report, TANF Work Participation Rate documentation review reports for each sample, and the federal fiscal year report, with appropriate staff and management to gain a better understanding of the common causes that contributed to errors. Available at: http://www.dhs.state.mn.us/County_Reports
- Review time sheets, activity logs, and other documents used to document/verify hours of participation to ensure the forms meet all documentation requirements (refer to MFIP Activity Guide in Appendix E of the MFIP ES Manual, or the ES MFIP Activity Guide Tip Sheet in Appendix B of this report). Revise forms as necessary, or use the DHS recommended eDocs forms available at:
 - DHS-2883-ENG 2-09, MDHS Request for Verification of School Attendance/Progress <https://edocs.dhs.state.mn.us/lfsrver/Legacy/DHS-2883-ENG>
 - DHS-3336-ENG 8-08, Self Employment Report Form <https://edocs.dhs.state.mn.us/lfsrver/Legacy/DHS-3336-ENG>
 - DHS-5006F-ENG 1-13, Earned Income/Pay Period/Date Tracking Form – 2013 <https://edocs.dhs.state.mn.us/lfsrver/Public/DHS-5006F-ENG>
 - DHS-5784-ENG 10-11, MFIP/DWP Employment Services Weekly Job Search Activity Documentation Log <https://edocs.dhs.state.mn.us/lfsrver/Public/DHS-5784-ENG>
- Conduct periodic management/supervisor reviews of participant case files, case notes, and the corresponding data entered in the MAXIS and WF1 systems to ensure proper documentation and data entry.

Employment services providers – Use the Supervisory Case File Review – TANF Work Participation Verification Documentation Checklist for Unpaid Core and Non-core Activities form developed a tool to assist county agencies in reviewing Employment Services cases for documentation purposes. It is available on CountyLink, DHS Program Resources, and Employment Services page under the Tip Sheets section at:

http://www.dhs.state.mn.us/dhs16_157830.pdf

Financial supervisor/worker – Use the Financial Case Review – TANF Work Participation Documentation, Verification and Coding Checklist form. This tool assists financial workers and supervisors to do TANF Work Participation Rate documentation reviews on their cases. A Checklist Guide was also provided to help direct users to additional information on using the form. For a copy of the form and guide, use the link below to access CountyLink, DHS Program Resources – DWP and MFIP page under DWP/MFIP Online Resources section:

http://www.dhs.state.mn.us/dhs16_146446.pdf

- Conduct county information sessions based on the MAXIS and Employment Services Activity Errors by Category and Cause, noted earlier in this report.
- Encourage workers to share strategies for working with participants to improve compliance with documentation requirements.
- Continue to use the summary and detailed data reports provided by the Department of Employment and Economic Development (DEED), available on its website at:

http://www.positivelyminnesota.com/All_Programs_Services/Work_Participation_-_MFIP_TANF/index.aspx

<https://mfipapps.positivelyminnesota.com/Login.aspx>

Attachment C: MFIP Activity Guide Tip Sheet

This Tip Sheet is on CountyLink, Program and Resources, Employment Services, Tip Sheets page at: http://www.dhs.state.mn.us/dhs16_156020.pdf*

Activity	Documentation Needed	Notes
(Unpaid) work experience	<ul style="list-style-type: none"> • Participant’s name • Dates covered (no less frequently than monthly) • Number of hours worked <i>each</i> day • Work site supervisor’s signature or other responsible individual, not employment services provider (ESP) • Name and phone number of work site supervisor (or other responsible individuals) must be on file or on activity log. 	Monthly hours must comply with Fair Labor Standards Act (FLSA)**
Community Service Programs (CSP)	<ul style="list-style-type: none"> • Participant’s name • Dates covered (no less frequently than monthly) • Number of hours worked <i>each</i> day • Work site supervisor’s signature or other responsible individual, not ESP • Name and phone number of work site supervisor (or other responsible individuals) must be on file or on activity log • Statement of useful public purpose the placement provides • Statement of how job will enhance employability. 	Monthly hours must comply with FLSA**
Job search Form DHS-5784 is mandatory to document job search activity	<p><i>Part 1 (Front side of form)</i></p> <ul style="list-style-type: none"> • Participant’s name • Dates covered (weekly) • Job contact information (date of contact, time spent on job contact, the position of interest, employer contact info, purpose and result of job contact)—all columns must be completed. <p><i>Part 2 (Back side of form)</i>—On-site activity</p> <ul style="list-style-type: none"> • Date • Time spent • Type of on-site activity (such as job club, structured job search, etc.) <p>For agency use only section</p> <ul style="list-style-type: none"> • Total hours (regular hours, on-site hours, holiday hours, other excused absence hours, CD/MH and rehab services hours) • Weekly check-in (date and method used) • Bi-weekly verification of job contact (note which job contact verified and method used to verify). <p>Signatures/dates</p> <ul style="list-style-type: none"> • Both participant and ESP. 	

***Family Stabilization Services** – See **Appendix E of [Employment Services Manual](#)** for the complete Supervision, Documentation, and Verification Requirements, including Family Stabilization Services (FSS) provisions.

** **Fair Labor Standards Act (FLSA)** – All work experience participants are considered employees under the FLSA. Participant would not be required to participate in unpaid work experience more hours than the monthly MFIP cash assistance amount plus the monthly food support amount divided by the federal minimum wage.

Activity	Documentation Needed	Notes
Providing child care to a CSP participant's child(ren)	<ul style="list-style-type: none"> • Participant's name • Dates covered • Number of hours <i>each</i> day • Signature of the participant who is engaged in the community service program • Name and phone number of the participant engaged in the CSP must also be on the Activity Log or on file. 	Monthly hours must comply with FLSA.**
Vocational education	<ul style="list-style-type: none"> • Participant's name • Dates covered (no less frequently than monthly) • Number of hours attended <i>each</i> day • Responsible individual's signature (not ESP) • Name and phone number of responsible individual must be on file or on Activity Log. <p>***See note below about study time allowed for all school-related activities.</p>	Responsible individual's signature is not needed if faxed or emailed by the school.
Job skills training (includes ABE, GED, ESL, FWL)	<ul style="list-style-type: none"> • Participant's name • Dates covered (no less frequently than monthly) • Number of hours attended <i>each</i> day • Responsible individual's signature (not ESP) • Name and phone number of responsible individual must be on file or on Activity Log. <p>***See note below about study time allowed for all school-related activities.</p>	Responsible individual's signature is not needed if faxed or emailed by the school.
High school	<ul style="list-style-type: none"> • Participant's name • Dates covered (no less frequently than monthly) • Number of hours attended <i>each</i> day • Responsible individual's signature (not ESP) • Name and phone number of responsible individual must be on file or on Activity Log. <p>***See note below about study time allowed for all school-related activities.</p>	Responsible individual's signature is not needed if faxed or emailed by the school.
Online and distance learning documentation	<ul style="list-style-type: none"> • The course/program log-in/log-out electronic record; or • Conducted in a supervised setting (name, phone number and signature of a responsible individual is required). 	

*****Study Time Documentation** Voc. Ed, High School (HS), job skills, Adult Basic Education (ABE), General Equivalency Diploma (GED), English as a Second Language (ESL) and Functional Work Literacy (FWL)—With a statement from the school about recommended study time. One hour of unsupervised study time per class hour can be allowed; more than one hour per class hour needs to be supervised and requires a signature from a responsible individual acknowledging study was supervised (cannot exceed the amount of study time advised by the school).

Attachment D: Tips for Work Benefit (WB) Cases

The TANF Work Participation Rate Documentation Review team developed the following tips to help ensure that WB cases have the correct hours and income reported and documented.

Project Using Actual Income and Hours:

For calculating initial and ongoing WB eligibility, use the most current income/hours on file. (*Do not average.*)

- WB policy states that the most current actual income/hours should be used to calculate eligibility. The actual income and hours should be coded on the prospective side of JOBS panel.
- Do not average or use multipliers to calculate income or hours for WB.
- Only use paystubs from the most current month – do not combine paystubs from two months. Example: Participant only sent one paystub for the most current income to date, November 2013. Gross income was \$253.75 and total hours were 35. The participant is paid bi-weekly. Code the JOBS panel with \$253.75 for both checks to *project income and code 70 hours as the prospective hours.*
- Document clearly which income and hours were used to code the JOBS panel.

Updating JOBS Panel and Income Windows with New Income/Hours Information:

Supplemental Nutrition Assistance Program (SNAP) – Use the JOBS SNAP Prosp Inc field to access the SNAP Prospective Income Calculation pop-up window. This window is an online calculator used to correctly calculate average hours and income per pay date, as well as prospective monthly income. DO NOT copy this income/hours data to the JOBS panel.

Health Care (HC) – Use the JOBS HC Inc Est field to access the HC Income Estimate window. Update this window with the average income per pay period anticipated from the income source listed on JOBS; the estimated monthly income is used in HC budgets for months. DO NOT update the “Hrs” field on the JOBS panel and DO NOT copy the window income data to the JOBS panel.

Work Benefit – Use the JOBS panel when new income/hours information is received for WB. MAKE SURE to update the *prospective* data on the JOBS panel to reflect the most current income and hours data. (*Do not average.*)

- Some cases receive new information for HC and/or SNAP after the WB approval is done. If new information becomes available, WB eligibility should be re-assessed, and the most current hours should be updated on the JOBS panel using the WB method of calculating income and hours (do not average.) For HC/SNAP, each income window should be updated using the respective program policy calculation method for income and/or hours.
- Workers – Document clearly which income and hours were used to calculate ongoing WB eligibility.

Document, Document, Document!

- For many cases, there is no information in case notes documenting how the WB income/hours were calculated.

Do Not Code Hours to Meet Work Participation Rate:

- Some cases have 90 or 160 hours coded, which does not reflect the documented hours in the case file.