

## NASTA Roundtable at APHSA Conference June 4, 2007

1. **Holidays** – In our general comments back to states (April 30, 2007) we specified that states would be able to have 10 holidays per individual and that the state must identify what those 10 holidays are in their plans.
  - ⇒ In order to streamline and conform this provision (i.e., to make work rate calculations consistent across states), we selected the number 10 holidays as that follows the number granted by the federal government.
  - ⇒ The states still get to identify what those 10 will be.
  
2. **Documentation** – states are arguing that our documentation requirements go overboard and are too rigorous to comply with and unrealistic. Based on these concerns, we have modified our requirements set forth in the guidance to give more flexibility to the states.
  - ⇒ **Paid Work Activities** – We required written documentation like pay stubs and did not allow phone call verifications to count. At this point we are ready to accept phone calls -- if, and only if, a pay stub cannot be obtained, then a phone call to the employer verifying a participant's hours of work would suffice as documentation. The caseworker needs to document the substance of such a call (who verified hours and what the hours were) for the case file. We will also accept information from services such as TALX.
  - ⇒ **Unpaid Work Activities (excluding high school)** – a time sheet or the equivalent of a time sheet kept by the participant of their hours performed that is signed by the supervisor/provider would suffice as adequate documentation.
  - ⇒ **Education** – In a vocational education setting, the state should use a time sheet. However, in a situation where the participant is attending high school, then whatever documentation a state can obtain from a school would suffice (whatever the school accepts as proof of attendance we would also accept).
  
3. **ESL** – per our guidance, states were required to tell us how ESL or basic education was “embedded” in a Vocational Education program. The purpose of this was to let us know that it wasn't just an ESL or basic education program that they were trying to claim was some kind of Voc Ed program. States have been confused how they can prove a program is “embedded” and have fretted as to what this means. We asked 22 states to further clarify this point; if we did not ask in the specific comments on this issue, you can assume your description was adequate.

- ⇒ We recognize that states have had some concerns and confusion over this issue. All we want to see in state plans is that they will make sure and verify that if a participant is doing ESL in this Vocational Education category, that this ESL program is actually part of a Voc Ed program and not a stand alone ESL program, because that falls under a different work category.
4. **Job Search /Job Readiness**– States would like to count “looking for child care” or “looking for housing” as a countable work activity under JS/JR. This is a bad idea for the following reasons:
- ⇒ On child care, this primarily applies to women with kids under 6 and they only have 20 hours of required work in a week. That leaves many other hours in the week when they can make these arrangements.
  - ⇒ We tried to make each work activity as close to what happens in the real world of employment. Most employers expect that all of these things, finding child care or housing or getting your kids vaccinated, all be done on the employees’ own time.
  - ⇒ TANF clients are free to do these things on their own time or take some of their excused absence time to do them. We just don’t think its right to be able to count these activities toward meeting the work rate.
5. **Substance Abuse** – We asked 25 states to describe their certification requirements for medical professionals who would make the diagnosis for a person needing substance abuse or mental health treatment.
- ⇒ Upon further review of this provision, we have decided not to require this information in the Work Verification Plans. States can determine on their own who is qualified to make the decision about whether or not someone needs treatment.
6. **Caseload Reduction Credit** – States really want the 2005 and 2006 work rates calculated so that they know how to anticipate their 2007 rate.
- ⇒ We plan to work very hard to get these calculations done soon. We cannot give you a date certain but please know that this is a priority to us.
7. **Internal Controls** – We asked 25 states to further clarify “how they know their data is accurate.” We are asking for very little here. We are asking them to tell us what their validation method is and other small things like what their sample size is. This is important because we want states to think ahead and have these systems in place so that should an audit occur, they have a verification/accuracy system up and running.

Source:

-----Original Message-----

**From:** Squier, Sidonie (ACF) [mailto:sidonie.squier@acf.hhs.gov]

**Sent:** Wednesday, June 06, 2007 4:48 PM

**To:** Linda Lawson

**Subject:** per request

Attached is the request made by participants in the TANF session that I put out the points I mentioned in my opening statements. I was hoping you could get these out to the states as further guidance (as it's somewhat informal and it takes a lot of bureaucracy to get something formal like a program instruction or official WVP guidance).