

**STATE OF OHIO  
OHIO DEPARTMENT OF JOB AND FAMILY SERVICES**

**WORK VERIFICATION PLAN**

**Submitted pursuant to 45 U.S.C. §261.63**

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Ohio Department of Job and Family Services  
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## Overview

Ohio operates a state-supervised, county-administered human service delivery system. The Ohio Department of Job and Family Services (ODJFS) establishes program policy, provides technical assistance, defines performance standards, requires continuous improvement activities, collects data and monitors all County Departments of Job and Family Services (CDJFS). Applications and reapplications, and assignment of work activities, are processed by the CDJFS.

### Temporary Assistance for Needy Families (TANF) Cash Assistance Program

Ohio's TANF cash assistance program is called Ohio Works First (OWF). OWF provides time-limited cash assistance to needy families with (or expecting) children by furnishing parents or specified relatives with work, training and other supportive services they need in order to attain permanent self-sufficiency while meeting the family's ongoing basic needs.

In September 2006, in response to the Deficit Reduction Act of 2005 and the Department of Health and Human Services (HHS) interim final TANF regulations issued June 29, 2006, ODJFS issued rules for the chapter of the Ohio Administrative Code (OAC) governing OWF which set forth the state's policy on work activities. The rules contained in the OAC became effective on an emergency basis September 29, 2006, and on a permanent basis on December 29, 2006. These provisions incorporated the interim final regulations, HHS guidance and state policy. On June 27, 2008, ODJFS revised the work activity rules to incorporate the changes required by the TANF final rules. These rules became effective October 1, 2008. All CDJFS agencies are bound by the provisions in the OAC and ODJFS monitors CDJFS compliance with these provisions as described in Section IV of this plan.

As set forth by the Ohio Revised Code (Ohio's state law) and the OAC, certain procedures must be followed regarding appraisal, assignment and work participation in the OWF program. All OWF work-eligible individuals shall be evaluated by the CDJFS and assigned to one or more work activities or alternative activities as appropriate, and shall be required to sign a self-sufficiency contract with the local CDJFS. The appraisal may include an evaluation of the employment, educational, physiological, and psychological abilities or liabilities, or both. The appraisal may determine whether any members of the assistance group (AG) are in need of other assistance or services in the areas of substance abuse, domestic violence, child abuse, or if any other circumstances exist which may limit an AG member's employability.

An AG is ineligible to participate in OWF unless each work-eligible individual, minor head of household and adult AG member, not later than thirty days after applying for OWF, enters into a written self-sufficiency contract with the CDJFS. The self-sufficiency contract shall set forth the rights and responsibilities of the AG as applicants for and participants of the program, including work responsibilities and other requirements designed to assist the AG in achieving self-sufficiency and personal responsibility. If a work-eligible individual, minor head of household or adult AG member fails or refuses, without good cause, to comply in full with a provision of the self-sufficiency contract, the CDJFS shall sanction the AG.

Reapplication of eligibility for OWF is required at least every twelve months for AGs that contain a work-eligible individual and every twenty-four months for child only AGs (with no work-eligible individuals). Appraisals may be conducted at any time. Self-sufficiency contracts may be amended at any time and are to be reviewed on a periodic basis based on the circumstances of an AG's case. Reassignments may occur when the CDJFS determines reassignment will aid the AG in achieving self-

sufficiency and personal responsibility and shall make reassignments when circumstances requiring reassignment occur.

**Ohio Works Now - Separate State Program (SSP) OAC Rule 5101:1-2-50**

Beginning January 2012, benefits will be issued under Ohio's new solely state funded Ohio Works Now (OWN) supplemental food assistance program. OWN provides a supplemental food assistance benefit to employed TANF families who are in receipt of Food Assistance, but who are not applying for or participating in Ohio's ongoing OWF cash assistance program. TANF families that are eligible for the OWN benefit must contain a work-eligible individual as defined in the TANF final rules, and meet the federal TANF work participation rate through the work-eligible individual's employment. A work-eligible individual is considered "employed" if their employment meets the TANF definition of: unsubsidized employment, public or private subsidized employment (SEP), or on-the-job training (OJT).

OWN is a supplemental food benefit to the Food Assistance AG's regular allotment and will be loaded onto the Ohio Direction Card/Electronic Benefit Transfer card that is already issued to the Food Assistance AG. OWN benefits will be loaded to the EBT card during the same month the Food Assistance regular allotment is available.

OWN will be paid out of Ohio's Maintenance-of-Effort (MOE) funds. Because Ohio will be claiming MOE expenditures for this benefit, the state must collect and report information on the eligible TANF families receiving OWN on the SSP-MOE Data Report. Ohio must also include families receiving the OWN benefit in the SSP denominator for the calculation of the combined TANF work participation rate.

The CDJFS is responsible for maintaining the AG record. The AG record is an audit trail showing that the CDJFS has substantiated whether an AG meets eligibility and participation requirements which would include, but is not limited to: application forms, reapplication forms, self-sufficiency contracts, appraisal forms, verification forms and documentation of participation in work activities. In addition to the ODJFS statewide automated Client Registry Information System Enhanced (CRIS-E) record, the CDJFS is to keep accurate and complete hard copy files or document imaged files.

ODJFS requires each CDJFS to meet work activity performance standards. When standards are not met, the CDJFS is required to develop and implement continuous improvement strategies and timeframes. The CDJFS corrective compliance plans are monitored by ODJFS until work activity standards are met.

**Corrective Compliance Plans**

As a result of Ohio's Corrective Compliance Plan submitted on September 27, 2011 to bring Ohio's TANF program into compliance with the federal work participation rate counties that failed to meet the work participation rates for State Fiscal Year 2011 have been required to develop corrective compliance plans to explain how they will meet the rates for FFY 2012. Required components of the plans include: top management commitment, accountability, utilization of reporting tools and standardization of approaches/practices.

## **I. Countable Work Activities**

**For each activity:**

- 1. Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity.)**
- 2. 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.**
- 3. 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.**
- 4. Describe the methods of daily supervision for each unpaid work activity.**

### ***Unsubsidized Employment OAC rule 5101:1-3-12.1***

*Full or part time employment in the private or public sector that is not subsidized by TANF or any other public program. This includes self-employment.*

This activity includes all paid employment and self-employment in which the employer is not subsidized, and includes “in-kind” or “barter” income. In-kind/barter income is an exchange of property or services.

Typically, in-kind and barter activities are completed in exchange for rent. This type of income is primarily treated as paid employment. Hours of participation would be verified and projected the same as in all other paid employment situations. If, however, it appears the individual providing the in-kind or barter service has a business, the income would be treated the same as any other self-employment situation and shall have projected hours of employment counted toward participation. It is the responsibility of the CDJFS to determine the relationship of employment between the participant and the individual or company being provided service.

Projected hours of employment count toward participation. Verification occurs during the application and every six months thereafter and includes pay stubs, employer statement, third party statement, tax records, ODJFS or CDJFS developed employer statement forms, electronic verification, or any other method of verification that is accepted by the Food Assistance program. The CDJFS is responsible for assisting the participant in obtaining verification. Documentation of unsubsidized employment hours will be maintained in the case file which include CRIS-E or other electronic databases expressly used for the purpose of tracking work participation hours (e.g. Employer/Provider Timecard Portal). The employer is responsible for verifying attendance.

### **Documentation:**

- 1. For self-employment, describe how the State counts and verifies 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.**

The hours of self-employment are determined by dividing the individual’s self-employment income (gross income less business expenses) by the federal minimum wage. OAC rule 5101:1-3-12.1.

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

The CDJFS shall determine monthly work participation hours by multiplying the current average weekly number of hours worked or employed by 4.3. These hours shall be used as the monthly amount of hours of work participation for the next six months. When employment has stopped, the actual hours (not converted) worked within the month employment terminates are used as the actual hours of participation. OAC rule 5101:1-3-12.1.

If the employed individual works the same number of hours per pay period, that number of hours shall be used in computing the individual's average weekly hours to be projected.

If the employed individual has fluctuating hours, the hours must be averaged. When income fluctuates, it is recommended that the CDJFS average the hours worked in the preceding four weeks, whenever possible.

In a situation when the hours from the prior four week period are not representative of current or future hours, the CDJFS will follow the same methodology used for the Food Assistance program. The variables that may need to be considered include:

(i) There are more than four weeks of pay stubs available and the individual states that an average of a longer period of time is more representative, because the hours worked in the most recent four weeks was less or greater than average. It is recommended that the CDJFS use all available income related information for the immediately preceding three-month period. This is an acceptable method of determining average weekly hours for longer than the four-week period.

(ii) If there are fewer than four weeks of pay stubs available, it is recommended that the CDJFS use all available income related information to arrive at a representative figure. This includes situations when the employed assistance group member disagrees with the use of earnings from the past four-week period as indicative of future earnings.

(iii) If there are no pay stubs available because the employment is new, it is recommended that the CDJFS project an estimated amount for a pay period based on the individual's income and circumstances. The CDJFS' projection shall be based on projected wages from hours of employment as reported by the individual or employer and calculated using the same methodology as for the Food Assistance program.

***Subsidized Public and Private Employment OAC rule 5101:1-3-12.2***

*Employment in the private sector or public sector 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 recipient.*

The subsidized employment program (SEP) position may be full or part time as defined by the employer. Participants in SEP shall be considered regular, permanent employees of the employer, shall be paid the same rate, and entitled to the same benefits and opportunities for advancement and affiliations with employee organizations as other employees doing similar work. The employer shall pay premiums to the Bureau of Workers' Compensation on account of employees for whom payments are made. The CDJFS or contracted program provider and the participant shall enter into a written contract with the employer.

This activity includes the three subsidized employment models from the Preamble to 45 CFR 261, et al., and any other equivalent models (which exclude OJT programs in which employers are subsidized to offset the costs of training). Also included are transitional jobs programs which provide hard-to-

employ OWF participants with time-limited, paid work experience combined with a comprehensive set of services in order to help participants overcome barriers to employment and build work related skills. Hours of participation in barrier-removal or educational activities may be included as long as the individual is paid for these hours as part of the subsidized employment activity.

Hours of participation in supportive activities, such as substance abuse treatment, mental health treatment or rehabilitation activities, or various other barrier-removal or educational activities, count toward the participation rates under subsidized employment only if the individual is paid for these hours as part of the subsidized employment activity. These activities must be integrated parts of subsidized employment in order to count. Such hours may also be counted under other work activities as appropriate.

Projected hours of employment count toward participation. Verification occurs during the application and every six months thereafter and may include pay stubs, employer statement, third party statement, tax records, ODJFS or CDJFS developed employer statement forms, electronic verification, or any other method of verification that is accepted by the Food Assistance program. The CDJFS is responsible for assisting the participant in obtaining attendance verification. Documentation of hours of work will be maintained in the case file which include CRIS-E or other electronic databases expressly used for the purpose of tracking work participation hours (e.g. Employer/Provider Timecard Portal). The employer is responsible for verifying attendance.

**Documentation:**

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

Projected hours of employment count toward hours of participation. The CDJFS shall determine monthly work participation hours by multiplying the current average weekly number of hours worked or employed by 4.3. This is the number of monthly work participation hours projected for the next 6 months.

***Work Experience Program OAC rule 5101:1-3-12.3***

*A work activity performed in return for cash assistance that provides an individual with an opportunity to acquire the general skills, knowledge and work habits necessary to obtain employment. Work experience includes work associated with the refurbishing of publicly assisted housing and service as an OWF ombudsperson. The purpose of the work experience is to improve the employability of those who cannot find unsubsidized employment. The following activities do not meet the definition of WEP: job search and job readiness activities; vocational education; caring for a disabled family member; or attending medical appointments.*

This activity includes structured work projects. Placements occur at any bona fide business, including private for-profit and non-profit organizations, as well as public agencies, with the goal of the work experience to prepare participants for and move them into unsubsidized employment or other work activities that can help in this transition. The countable hours of participation for the work experience program (WEP) include actual daily hours of participation, holidays and excused absences.

CDJFS work with providers and have agreements with respect to services performed and verification requirements. All actual hours of participation must be verified. Verification is considered to be met when the CDJFS has received documentation of actual hours of participation. Verified hours of participation must be accounted for by the CDJFS. Verified hours of participation must be entered into the CRIS-E system in a timely manner. The CDJFS should determine which type of verification is

appropriate based on the activity. Acceptable types of verification/documentation are outlined in the Ohio Administrative Code (OAC) and include the following: the CRIS-E generated schedule; JFS 06910 "Record of Attendance Report;" electronic data communication; documented phone contact with the work site. Other CDJFS methods of documentation are acceptable as long as the following elements are included: the participant's name; an accounting of all assigned hours of participation at the participation site; the name and location of the participation site; the name of the participant's work site supervisor; and the name and phone number of the person verifying hours. Documentation of hours of work will be maintained in the case file which can include CRIS-E or other electronic databases expressly used for the purpose of tracking work participation hours (e.g. Employer/Provider Timecard Portal). The employer or work site is responsible for verifying attendance. OAC rule 5101:1-3-12.

All participation activities must be supervised no less frequently than once each day in which the individual is scheduled to participate. Daily supervision means that a responsible party has daily responsibility for oversight of the individual's participation, not necessarily daily, in-person contact with the participant. Work-eligible individuals must be supervised by the employer, the work supervisor, or other responsible third party. OAC rule 5101:1-3-12.

When the employer/employee relationship is created, the Fair Labor Standards Act (FLSA) minimum wage requirements are applicable. Participation in WEP requires daily supervision which helps the participant develop basic work skills, improve work habits, and moves the participant toward employability. An employer/employee relationship is created, unless otherwise documented by the CDJFS in the AG OWF record.

"To employ" is defined for purposes of complying with FLSA as "to suffer or permit to work." The maximum monthly hours of assignment allowable under FLSA is determined by adding the OWF grant (before recoupment) and food assistance allotment (before recoupment) less child support collections received in the month and retained to reimburse the state or federal government for the current month's OWF payment. This amount is then divided by the higher of the state or federal minimum wage to determine the maximum allowable monthly hours that can be assigned in WEP. OAC rule 5101:1-3-12.

**Documentation: none**

***On-the-Job-Training OAC rule 5101:1-3-12.4***

*Training in the public or private sector that is given to a paid employee while he or she is engaged in productive work and that provides knowledge and skills essential to the full and adequate performance on the job.*

This activity includes specialized training for an employed participant for a specific position, customized training for a specific position, or skill upgrade training for a specific position, which may include some aspects of supported work for individuals with disabilities if it includes significant on-site training, knowledge and skills essential to the job. Additional countable activities include classroom instruction of computers, literacy, and English as a second language (ESL), if the skills would assist the participant to complete their assigned duties and are paid, this includes: paid internships, paid clinical work, practicums, professional certification and clinical training required by an academic or training institution for licensure, and any equivalent activity which meets the definition, when the training and work are directly related and the client is paid by the employer to attend them.



Upon satisfactory completion of training it is expected that the employer will retain the participant as a regular employee. Projected hours of employment count toward participation. Verification occurs during the application and every six months thereafter and may include time sheets, service provider attendance records, third party statement, electronic verification, ODJFS or CDJFS developed attendance records or any other method of verification that is accepted by the Food Assistance program. The CDJFS is responsible for obtaining participation verification. This activity must be supervised by an employer, work site sponsor, or other responsible third party on an ongoing basis no less frequently than once in each day in which the individual is scheduled to participate.

Documentation of hours of work will be maintained in the case file which include CRIS-E or other electronic databases expressly used for the purpose of tracking work participation hours (e.g. Employer/Provider Timecard Portal). The employer or work site is responsible for verifying attendance.

If the employed individual works the same number of hours per pay period, that number of hours shall be used in computing the individual's average weekly hours to be projected.

If the employed individual has fluctuating hours, the hours must be averaged. When income fluctuates, it is recommended that the CDJFS average the hours worked in the preceding four weeks, whenever possible.

In a situation when the hours from the prior four week period are not representative of current or future hours, the CDJFS will follow the same methodology used for the Food Assistance program. The variables that may need to be considered include:

- (i) There are more than four weeks of pay stubs available and the individual states that an average of a longer period of time is more representative, because the hours worked in the most recent four weeks was less or greater than average. It is recommended that the CDJFS use all available income related information for the immediately preceding three-month period. This is an acceptable method of determining average weekly hours for longer than the four-week period.
- (ii) If there are fewer than four weeks of pay stubs available, it is recommended that the CDJFS use all available income related information to arrive at a representative figure. This includes situations when the employed assistance group member disagrees with the use of earnings from the past four-week period as indicative of future earnings.
- (iii) If there are no pay stubs available because the employment is new, it is recommended that the CDJFS project an estimated amount for a pay period based on the individual's income and circumstances. The CDJFS' projection shall be based on projected wages from hours of employment as reported by the individual or employer and calculated using the same methodology as for the Food Assistance program.

**Documentation:**

- 1. Describe the nature of training provided by employers that distinguishes this from subsidized employment.**

OJT is distinguished from subsidized employment by the inclusion of a training plan.

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

Projected hours of employment count toward hours of participation. The CDJFS shall determine monthly work participation hours by multiplying the current average weekly number of hours worked or employed by 4.3. This is the number of monthly work participation hours projected for the next 6 months.

***Job Search and Job Readiness OAC rule 5101:1-3-12.5***

*The act of seeking or obtaining employment, preparation to seek or obtain employment, including life skill training, substance abuse treatment, mental health treatment, or rehabilitation activities for those who are otherwise employable. The following activities do not meet the definition of job search and job readiness: child’s dental checkups, immunizations, and school attendance; parenting skills training; participating in Head Start; personal care; activities that promote a healthier lifestyle, such as smoking cessation. A CDJFS may utilize the services of private and governmental entities under contract with the CDJFS in operating the program.*

This activity includes resume preparation, completing a job application, interview skills training, workplace expectations training, training in effective job seeking, life skills training, making contact with potential employers, seeking employment opportunities, applying for job vacancies, interviewing for jobs, other equivalent structured acts of seeking or obtaining employment and other necessary activities to prepare an individual to obtain employment (e.g. activities related to a specific employment field). Additionally, activities may include substance abuse treatment, mental health treatment, or rehabilitation treatment. Services and activities may be provided through or approved by the CDJFS or by a third party provider. The employer or work site is responsible for signing off on time sheets or other documents verifying attendance. Any activity that is not supervised by a work site or employer is supervised by contact/communication on a regular basis between the CDJFS and participant.

The countable hours of participation for job search/job readiness include actual daily hours of participation, including actual hours of participation in treatment or rehabilitation, holidays and excused absences. Acceptable types of verification/documentation are outlined in the OAC and include the following: the CRIS-E generated schedule; JFS 06910 “Record of Attendance Report;” electronic data communication; documented phone contact with the work site or employer. Other CDJFS methods of documentation are acceptable as long as the following elements are included: the participant’s name; an accounting of all assigned hours of participation; the name and location of the participation site; the name of the participant’s work site supervisor if applicable; and the name and phone number of the person verifying hours. Documentation of hours of work will be maintained in the case file which include CRIS-E or other electronic databases expressly used for the purpose of tracking work participation hours (e.g. Employer/Provider Timecard Portal). Any job search activity that is self-directed will require the CDJFS to conduct random checks with employers to verify actual hours of participation. Only verified hours of participation will be reported.OAC rule 5101:1-3-12.

**Documentation:**

- 1. If the State intends to count substance abuse treatment, mental health treatment and rehabilitation activities, describe the criteria to determine whether recipients are “otherwise employable” and establish the necessity of treatment or therapy. Describe the certification requirements for qualified medical or mental health professionals used in this process.**

Pursuant to OAC rule 5101:1-3-12, the CDJFS shall conduct an appraisal of each work-eligible individual as soon as possible after an AG submits an application to participate in OWF. The appraisal

may include an evaluation of the employment, educational, physiological, and psychological abilities or liabilities of the work-eligible individual. If, during the course of the appraisal of the work-eligible individual, possible physiological or psychological barriers to employment are identified, and the work-eligible individual is determined to be otherwise employable, the CDJFS can refer the individual to a qualified medical or mental health professional for further evaluation. Based on the results of the evaluation conducted by a qualified medical or mental health professional, the CDJFS may choose to assign the work-eligible individual to acceptable job readiness activities that incorporate substance abuse treatment, mental health treatment or rehabilitation activities, as appropriate.

**2. Describe how the State ensures that no more than six total weeks (four consecutive weeks) of job search and job readiness assistance are reported in a fiscal year.**

An individual's participation in job search or job readiness assistance counts for a maximum of six weeks in the preceding twelve month period.

For the six week limitation on participation, a week is defined as (1) twenty hours for a work-eligible individual who is a single custodial parent with a child under six years of age; or (2) thirty hours for all other work-eligible individuals.

For purposes of the four consecutive week period, a week is defined as seven consecutive days. Any hours of participation in job search and job readiness assistance activities in the seven consecutive day period shall count as an entire week.

Ohio is able to track job search and job readiness participation by hours to accommodate both the weekly and the hourly limitations. The weeks and the hours are tracked in the "Individual Counter File" that is read into the program that builds the Universe File. For each individual that is participating in a job search or job readiness activity in a reporting month, the verified hours are checked against the cumulative hours stored in the Individual Counter File to determine how many participation hours are eligible for federal reporting. OAC rule 5101:1-3-12.5

***Community Service OAC rule 5101:1-3-12.6***

*Structured programs and embedded activities in which TANF work-eligible individuals perform work for the direct benefits of the community under the auspices of public or nonprofit organizations, and are also designed to improve the employability of recipients not otherwise able to obtain unsubsidized full-time employment. Community service programs must be limited to projects that serve a useful community purpose in fields such as health, social service, environmental protection, education, urban or rural development, welfare, recreation, public facilities, public safety and child care. The following activities do not meet the definition of community service: substance abuse treatment programs; mental health and family violence counseling; life skills classes; parenting classes; job readiness instruction; and caring for a disabled household member. A CDJFS shall take into account, to the extent possible, the prior training, experience and skills of a recipient in making appropriate community service assignments.*

This activity is limited to projects that serve a useful community purpose such as health, social service, environmental protection, urban and rural redevelopment, welfare, recreation, public facilities, public safety, child care or other equivalent structured activities that both provide a community service and improve the employability of participants. The countable hours of participation for Community Service include actual daily hours of participation, holidays and excused absences.

All actual hours of participation must be verified. Verification is considered to be met when the CDJFS has received documentation of actual hours of participation. Verified hours of participation must be accounted for by the CDJFS. Verified hours of participation must be entered into the CRIS-E system in a timely manner. The CDJFS should determine which type of verification is appropriate based on the activity. Acceptable types of verification/documentation are outlined in the OAC and include the following: the CRIS-E generated schedule; JFS 06910 "Record of Attendance Report;" electronic data communication; and documented phone contact. Other CDJFS methods of documentation are acceptable as long as the following elements are included: the participant's name; an accounting of all assigned hours of participation at the participation site; the name and location of the participation site; the name of the participant's work site supervisor; and the name and phone number of the person verifying hours. Documentation of hours of work will be maintained in the case file which include CRIS-E or other electronic databases expressly used for the purpose of tracking work participation hours (e.g. Employer/Provider Timecard Portal). The employer or work site is responsible for verifying attendance. OAC rule 5101:1-3-12.

All work participation activities must be supervised no less frequently than once in each day in which the individual is scheduled to participate. Daily supervision means that a responsible party has daily responsibility for oversight of the individual's participation, not necessarily daily, in-person contact with the participant. Work-eligible individuals must be supervised by the county agency, work site supervisor, or other responsible third party. OAC rule 5101:1-3-12.

**Documentation:**

- 1. Describe how the types of community service positions that create an employer/employee relationship and are subject to the FLSA minimum wage requirements will be determined.**

"To employ" is defined for purposes of complying with FLSA as "to suffer or permit to work." The maximum monthly hours of assignment allowable under FLSA are determined by adding the OWF grant (before recoupment) and food assistance allotment (before recoupment) less child support collections received in the month and retained to reimburse the state or federal government for the current month's OWF payment. This amount is then divided by the higher of the state or federal minimum wage to determine the maximum allowable monthly hours that can be assigned in Community Service. OAC rule 5101:1-3-12.

When the employer/employee relationship is created FLSA minimum wage requirements are applicable. Participation in any Community Service activity requires daily supervision. It helps the participant develop basic work skills, improve work habits and helps move the participant toward employability. An employer/employee relationship is created, unless otherwise documented by the CDJFS in the AG OWF record.

Community service positions must be structured; provide a useful community service; improve the employability of the participant who is otherwise unable to obtain employment; help the participant develop basic work skills and improve work habits; and move the participant toward employability.

- 2. If the State permits self-initiated community service positions, describe how it determines that the position provides a direct community service and improves the recipient's employability.**

The CDJFS will determine whether to accept self-initiated community service positions. Self-initiated community service positions shall be structured activities that provide a community service as well as

improve the employability of participants. Self-initiated community service positions will be determined and documented in the AG OWF record on a case-by-case basis, by the CDJFS. Requirements for verification of hours and supervision in these activities are the same as for any other community service activity.

***Vocational Education Training OAC rule 5101:1-3-12.7***

*Organized education programs that are directly related to the preparation of individuals for employment in current or emerging occupations requiring training.*

This activity includes course work in baccalaureate or advanced degrees, associate degree programs, instructional certificate programs, industry skill certifications, noncredit course work designed to obtain a specific job skill, supervised study hours, or other equivalent activity that meets the definition of Vocational Educational Training. Structured and supervised distance learning which meets the definition of Vocational Education Training is an acceptable method of participating in this activity. Basic and remedial education and ESL training will count up to the twelve months as long as the training is a necessary or regular part of the Vocational Educational Training.

The countable hours of participation for Vocational Education Training will include actual daily hours of participation, including actual hours of supervised homework time, up to one hour of unsupervised homework time for each hour of class time, holidays and excused absences. The total homework time will not exceed the hours required or advised by the educational provider.

All actual hours of participation must be verified. Verification is considered to be met when the CDJFS has received documentation of actual hours of participation. Verified hours of participation must be accounted for by the CDJFS. Verified hours of participation must be entered into the CRIS-E system in a timely manner. The CDJFS should determine which type of verification is appropriate based on the activity. Acceptable types of verification/documentation are outlined in the OAC and include the following: the CRIS-E generated schedule; JFS 06910 "Record of Attendance Report;" JFS 06909 "Record of School Attendance Report;" electronic data communication; documented phone contact with the educational site. Other CDJFS methods of documentation are acceptable as long as the following elements are included: the participant's name; an accounting of all assigned hours of participation at the participation site; the name and location of the participation site; the name of the participant's work site supervisor; and the name and phone number of the person verifying hours. Documentation of hours of work will be maintained in the case file which include CRIS-E or other electronic databases expressly used for the purpose of tracking work participation hours (e.g. Employer/Provider Timecard Portal). The educational or work site is responsible for verifying attendance. OAC rule 5101:1-3-12.

All participation activities must be supervised no less frequently than once in each day in which the individual is scheduled to participate. Daily supervision means that a responsible party has daily responsibility for oversight of the individual's participation, not necessarily daily, in-person contact with the participant. Work-eligible individuals must be supervised by the educational site or other responsible third party. OAC rule 5101:1-3-12.

**Documentation:**

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

This activity is limited to a lifetime 12-month limit. ODJFS currently tracks Vocational Educational Training months in CRIS-E. When an individual assigned to a Vocational Education Training activity reaches the 12-month limit, their hours are reduced to zero for reporting of this activity in the TANF Data Report, and the hours are reported as “other work activities.”

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

Basic and remedial education and ESL training will count for up to the twelve month period as long as it is a necessary or regular part of the Vocational Educational Training. The determination that activities are a necessary or regular part of the Vocational Education Training will be done by the CDJFS. The CDJFS will approve these activities in cases where an individual’s chances of succeeding or excelling in the vocational education program are improved by participation in the ESL/basic education component. A statement from the vocational educational provider will be maintained in the OWF AG case file that indicates that participation in basic and remedial education or ESL training is an integral part of Vocational Educational Training.

***Job Skills Training Directly Related to Employment OAC rule 5101:1-3-12.9***

*Training and education for job skills required by an employer to provide an individual with the ability to obtain employment or to advance or adapt to the changing demands of the workplace.*

This activity includes customized training to meet the needs of a specific employer; general training that prepares an individual for employment, or other equivalent activity that meets the definition. Activities include unpaid internships, unpaid clinical work, and unpaid clinical training required by an academic or training institution for licensure, and any equivalent activity which meets the definition of Job Skills Training Directly Related to Employment. Additionally, literacy instruction or language instruction, if focused on skills needed for employment or combined in a unified whole with job training, workplace training, or skill upgrading is included. This activity also includes post-secondary education directly related to employment at any state certified college or university that leads to a bachelor’s or advanced degree after the twelve months of Vocational Educational Training have been used, and all services and programs described in the Vocational Educational Training activity above.

The countable hours of participation for Job Skills Training Directly Related to Employment will include actual daily hours of participation, including actual hours of supervised homework time, up to one hour of unsupervised homework time for each hour of class time, holidays and excused absences. The total homework time will not exceed the hours required or advised by the educational provider.

All actual hours of participation must be verified. Verification is considered to be met when the CDJFS has received documentation of actual hours of participation. Verified hours of participation must be accounted for by the CDJFS. Verified hours of participation must be entered into the CRIS-E system in a timely manner. The CDJFS should determine which type of verification is appropriate based on the activity. Acceptable types of verification/documentation are outlined in the OAC and include the following: the CRIS-E generated schedule; JFS 06910 “Record of Attendance Report;” JFS 06909 “Record of School Attendance Report;” electronic data communication; documented phone contact with the work site. Other CDJFS methods of documentation are acceptable as long as the following elements are included: the participant’s name; an accounting of all assigned hours of participation at the participation site; the name and location of the participation site; the name of the participant’s work site supervisor; and the name and phone number of the person verifying hours. Documentation of hours of work will be maintained in the case file which include CRIS-E or other

electronic databases expressly used for the purpose of tracking work participation hours (e.g. Employer/Provider Timecard Portal). The employer or work site is responsible for verifying attendance. OAC rule 5101:1-3-12.

All participation activities must be supervised no less frequently than once in each day in which the individual is scheduled to participate. Daily supervision means that a responsible party has daily responsibility for oversight of the individual's participation, not necessarily daily, in-person contact with the participant. Work-eligible individuals must be supervised by the employer, the work supervisor, educational site, or other responsible third party. OAC rule 5101:1-3-12.

**Documentation: None**

***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 OAC rule 5101:1-3-12.10***

*Education related to a specific occupation, job, or job offer.*

This activity includes course work designed to provide the knowledge and skills for specific occupations or work settings, including Adult Basic Education, ESL, or certificate of high school equivalency, as a prerequisite for employment by employers or occupations, or any equivalent activity that meets the definition of 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. The countable hours of participation for Education Directly Related to Employment include actual daily hours of participation, including actual hours of supervised homework time, up to one hour of unsupervised homework time for each hour of class time, holidays, and excused absences. The total homework time will not exceed the hours required or advised by the educational provider.

All actual hours of participation must be verified. Verification is considered to be met when the CDJFS has received documentation of actual hours of participation. Verified hours of participation must be accounted for by the CDJFS. Verified hours of participation must be entered into the CRIS-E system in a timely manner. The CDJFS should determine which type of verification is appropriate based on the activity. Acceptable types of verification/documentation are outlined in the OAC and include the following: the CRIS-E generated schedule; JFS 06910 "Record of Attendance Report;" JFS 06909 "Record of School Attendance Report;" electronic data communication; documented phone contact with the work site. Other CDJFS methods of documentation are acceptable as long as the following elements are included: the participant's name; an accounting of all assigned hours of participation at the participation site; the name and location of the participation site; the name of the participant's work site supervisor; and the name and phone number of the person verifying hours. The educational or work site is responsible for verifying attendance. OAC rule 5101:1-3-12.

All participation activities must be supervised no less frequently than once in each day in which the individual is scheduled to participate. Daily supervision means that a responsible party has daily responsibility for oversight of the individual's participation, not necessarily daily, in-person contact with the participant. Work-eligible individuals must be supervised by the employer, the work supervisor, educational site, or other responsible third party. OAC rule 5101:1-3-12.

Counties may determine on a case-by-case basis whether an immigrant or refugee who holds a high school diploma from another country, but not an American high school diploma or a certificate of general equivalency development (GED), can qualify to participate in this activity. The determination will be based upon the appraisal or assessment of the work-eligible individual, documenting the fact

that verification is either unattainable or the diploma from the other country is not comparable to an American diploma or GED.

**Documentation: None.**

***Satisfactory Attendance at Secondary School or GED Program OAC rule 5101:1-3-12.11***

*Regular attendance, in accordance with the requirements of the secondary school or course of study at a secondary school, or in a course of study leading to a certificate of general equivalence, in the case of a recipient who has not completed secondary school or received such a certificate.*

This activity includes course work at a secondary school or GED program. The countable hours of participation for satisfactory attendance at secondary school or GED Program will include actual daily hours of participation, if the attendance is good or satisfactory, including actual hours of supervised homework time, up to one hour of unsupervised homework time for each hour of class time, holidays, and excused absences. The total homework time will not exceed the hours required or advised by the educational provider.

The Learning, Earning and Parenting (LEAP) Program is a component of OWF that meets the definition of satisfactory attendance at secondary school or GED program. LEAP is Ohio's program to encourage teen parents to remain in school and obtain a high school diploma or high school equivalence diploma (HSED). All teen parents (including pregnant teens) under the age of 18 or 18 and attending school are subject to LEAP program requirements, including attendance requirements. The school attendance officer in each school that has a LEAP program participant enrolled is required to provide information monthly to the CDJFS about each participant's attendance. The school reviews the actual attendance of the teen and records the specific days the teen was absent and whether the absence was excused or unexcused. A \$62 attendance bonus is provided for any month that a teen maintains good attendance (four or fewer total absences in a month with no more than two of such absences unexcused). A \$62 sanction is imposed for any month that a teen does not maintain good attendance (more than two unexcused absences in a month). LEAP participants also receive services through the CDJFS, including nutrition information, parenting classes, tutorial assistance, stress management classes, substance abuse education, housing assistance and legal services.

All actual hours of participation must be verified. Verification is considered to be met when the CDJFS has received documentation of actual hours of participation. Verified hours of participation must be accounted for by the CDJFS. Verified hours of participation must be entered into the CRIS-E system in a timely manner. The CDJFS should determine which type of verification is appropriate based on the activity. Acceptable types of verification/documentation are outlined in the (OAC) and include the following: the CRIS-E generated schedule; JFS 06910 "Record of Attendance Report;" JFS 06909 "Record of School Attendance Report;" electronic data communication; documented phone contact with the educational site. Other CDJFS methods of documentation are acceptable as long as the following elements are included: the participant's name; an accounting of all assigned hours of participation at the participation site; the name and location of the participation site; the name of the participant's work site supervisor; and the name and phone number of the person verifying hours. Documentation of hours of work will be maintained in the case file which include CRIS-E or other electronic databases expressly used for the purpose of tracking work participation hours (e.g. Employer/Provider Timecard Portal). The educational or work site is responsible for verifying attendance. OAC rule 5101:1-3-12.

All participation activities must be supervised no less frequently than once in each day in which the individual is scheduled to participate. Daily supervision means that a responsible party has daily



responsibility for oversight of the individual's participation, not necessarily daily, in-person contact with the participant. Work-eligible individuals must be supervised by the site supervisor, educational site, or other responsible third party. OAC rule 5101:1-3-12.

**Documentation: None.**

***Caring for a Child of a Community Service Participant OAC rule 5101:1-3-12.8***

*Providing child care to enable another TANF recipient to participate in a community service program.*

This activity includes providing child care to another TANF recipient who participates in the Community Service Program. The countable hours of participation for Caring for a Child of a Community Service Participant will include actual daily hours of participation, holidays and excused absences.

In a two-parent family, one parent cannot count as participating by providing child care for his or her own child while the other parent participates in a Community Service Program activity.

All actual hours of participation must be verified. Verification is considered to be met when the CDJFS has received documentation of actual hours of participation. Verified hours of participation must be accounted for by the CDJFS. Verified hours of participation must be entered into the CRIS-E system in a timely manner. The CDJFS should determine which type of verification is appropriate based on the activity. Acceptable types of verification/documentation are outlined in the OAC and include the following: the CRIS-E generated schedule; electronic data communication; documented phone contact with the site. Other CDJFS methods of documentation are acceptable as long as the following elements are included: the participant's name; an accounting of all assigned hours of participation at the participation site; the name and location of the participation site; the name and phone number of the person verifying hours. Documentation of hours of work will be maintained in the case file which include CRIS-E or other electronic databases expressly used for the purpose of tracking work participation hours (e.g. Employer/Provider Timecard Portal). The CDJFS is responsible for verifying attendance. OAC rule 5101:1-3-12.

All participation activities must be supervised no less frequently than once in each day in which the individual is scheduled to participate. Daily supervision means that a responsible party has daily responsibility for oversight of the individual's participation, not necessarily daily, in-person contact with the participant. Work-eligible individuals must be supervised by the CDJFS or other responsible third party. OAC rule 5101:1-3-12.

**Documentation: None**

**II. Hours Engaged in Work**

***Excused Absences OAC rules 5101:1-3-11 and 5101:1-3-12***

If a participant has "good cause" for failure or refusal to comply with a provision of the participant's self-sufficiency contract, that participant is not subject to sanction. The state has defined "good cause," and in some instances hours of participation missed as a result of good cause will be considered an "excused absence" for purposes of the state's work participation rate on unpaid activities.

"Good cause" for noncompliance is limited to the following reasons: illness of the work-eligible individual or another family member, if the care by the work-eligible individual was necessary; previously scheduled appointment for either the work-eligible individual or a family member necessary

for medical, dental, or vision care; previously scheduled appointment for a work-eligible individual for a job interview including any subsequent interviews and/or testing requirements; court ordered appearances; appointment with another social services agency or program; death in the family, with the length of absence to be determined by the CDJFS; a school, place of work, or worksite is closed due to weather or other emergency; lack of child care; a failure of the CDJFS to provide supportive services; a failure of the CDJFS to provide the individual with all information necessary about the assignment; circumstances involving domestic violence which make it difficult for the individual to comply in full with the self-sufficiency contract; or other circumstances determined on a case by case basis by the CDJFS that are considered a fair and reasonable justification for the work-eligible individual's failure or refusal to comply in full with a provision of the self sufficiency contract.

“Holidays” recognized for work participation rates are the 10 federal holidays. These are New Year’s Day (first day in January); Martin Luther King’s Birthday (third Monday in January); Presidents’ Day (third Monday in February); Memorial Day (last Monday in May); Independence Day (Fourth of July); Labor Day (first Monday in September); Columbus Day (second Monday in October); Veterans’ Day (eleventh of November); Thanksgiving Day (fourth Thursday in November); Christmas Day (twenty-fifth of December). In order to count a holiday as actual hours of participation, the individual must have been scheduled to participate on that day.

For purposes of the work participation rate, excused absences that count toward the rate will be based on a determination of good cause for noncompliance and the limitation of 80 hours of excused absences in the preceding 12-month period, no more than 16 hours of which may occur in a month for each work-eligible individual. CRIS-E automated processing is programmed to ensure only the allowable amount of excused absences will be transmitted in the TANF Data Report.

#### ***Fair Labor Standards Act) Deeming***

Ohio has received approval from the Food and Nutrition Service (FNS) and is recognized as a Simplified Food Stamp State.

The maximum monthly hours of assignment allowable under FLSA are determined by adding the OWF grant (before recoupment) and food assistance allotment (before recoupment) less child support collections received in the month and retained to reimburse the state or federal government for the current month’s OWF payment. This amount is then divided by the higher of the state or federal minimum wage. OAC rule 5101:1-3-12.

In situations where a food assistance AG contains individuals not in receipt of OWF, Ohio is applying the following proration methodology to determine the countable food assistance allotment. The total food assistance allotment is divided by the number of members in the food assistance AG. The result would then be multiplied by the number of individuals in receipt of OWF. This amount would then be used as the food assistance allotment for FLSA work activity assignment purposes.

Ohio will report in the quarterly TANF Data Report the number of deemed hours for the overall work participation rate in Element 62 and the number of deemed hours for the two-parent work participation rate in Element 64.

### **III. Work-Eligible Individual**

**1. 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. These are:**

- **A minor parent who is not the head-of-household;**
- **An alien who is ineligible to receive assistance due to his or her immigration status;**
- **At State option, on a case-by-case basis, a recipient of Supplemental Security Income (SSI) benefits; and**
- **At State option on a case-by-case basis, a parent who is a recipient of Social Security Disability Insurance (SSDI) benefits.**

**The State should also describe its procedures for identifying a parent caring for a disabled family member, who may also be excluded from the definition of a work-eligible individual. The procedures should define the terms “disabled,” and “family member.” This should include a means of ensuring that the need for care in the home is supported by medical documentation and describe the nature of the medical documentation used to make such determinations. If the State includes in this group parents caring for a family member with a temporary disability, the State must describe its procedures for determining when the family member is no longer disabled and ensuring that the parent is then identified as a work-eligible individual.**

OAC rule 5101:1-3-12 contains the work-eligible individual definition and requirements for the CDJFS. For the purposes of determining a work-eligible individual, the following definitions are used when determining whether an individual qualifies as a parent caring for a disabled family member who may be excluded from the definition of a work-eligible individual.

“Disability” shall be deemed to exist when there is a physical or mental illness or impairment. The disability shall be supported by competent medical documentation and must be of such a debilitating nature as to reduce substantially or eliminate the individual's ability to work. The disability must be expected to last for a period of at least thirty days. A finding of eligibility for retirement, survivor and disability insurance (RSDI) or SSI benefits based on disability or blindness is acceptable proof of disability for purposes of this rule. Medical forms currently available to the CDJFS may be used to confirm the disability.

A “family member” includes an individual who resides in the home, is related by blood, marriage, adoption, or has a guardian arrangement. It also includes an individual whose relationship to the OWF adult functions as if the individual was related by blood, marriage, adoption, or has a guardianship arrangement.

The status of eligibility for this provision shall be reviewed at every reapplication and when a change in circumstances is reported.

System support is available to identify all work-eligible individuals as defined in 45 CFR 261.2 and all non-recipient parents excluded from the definition of work-eligible individual.

All adults and minor heads-of-household are identified in the CRIS-E eligibility system. CRIS-E assigns a participation status code (PSC) to identify work-eligible individuals as defined in 45 CFR

261.2 and non-recipient parents excluded from the definition of a work-eligible individual. The appropriate PSC is pre-displayed for the CDJFS worker based upon entry into other processes. There are separate PSCs in CRIS-E to identify non-recipient work-eligible individuals. The CDJFS has the ability to assess, assign and record verified hours of participation for non-recipient work-eligible individuals in the CRIS-E system.

Aliens, recipients of SSI and minor parents are identified in the CRIS-E system as non-participants and therefore not work-eligible individuals. They are not in receipt of OWF. Recipients of SSDI who are also receiving OWF are identified through the use of a PSC that identifies the recipient of SSDI as being excluded from the definition of work-eligible individual.

**2. 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.**

All adults and minor heads-of-household are identified in the CRIS-E system and reported on the TANF Data Report or the SSP-MOE Data Report. Non-recipient work-eligible individuals are also identified and reported in the TANF Data Report or the SSP-MOE Data Report. (Please refer to section IV for ensuring accuracy in reporting procedures.)

**3. Describe the procedures that show how the State ensures that, for each work-eligible individual, 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 in an activity that does not meet a federal definition.**

Work participation data is reported by work sites to the county agency via paper or electronic documentation. County staff then enters the data into CRIS-E. The CRIS-E system requires the CDJFS to track weekly hours of participation per activity for each work-eligible individual. The verification code used to verify the hours of participation distinguishes the type of verification received. Each month work activity data is extracted from CRIS-E. It is run through a series of extract programs and the resulting data becomes both our statewide work participation reports (which are shared with the CDJFS) and the TANF Data Report file which is sent to the Administration of Children and Families (ACF).

The CDJFS have been instructed on the proper entry of data into CRIS-E through transmittals, statewide training including handouts, system bulletins and reports.

#### **IV. Internal Controls**

**The State is required to describe internal controls that ensure a consistent measurement of the work participation rates. The Work Verification Plan should contain a clause confirming that the State will maintain all pertinent findings produced through its internal control processes and that these findings will be available for use by ACF and other auditors in their review of the State's work participation verification system.**

**If the State is phasing in procedures or internal controls, describe the phase-in. All procedures must be in place by September 30, 2007.**

The results and findings produced through internal control processes will be maintained and will be available for use by ACF, the Auditor of State, and other auditors in their review of Ohio's work participation verification system.

##### **Documentation:**

- 1. Describe the internal controls designed to ensure established work verification procedures are properly being employed. Such controls may include supervisory guidance, policy directives, and staff training plans, as well as quality assurance processes, such as monitoring procedures to ensure adherence to procedures by staff, providers and contractors. For example, to ensure the State is identifying all work-eligible individuals, a State may periodically check the disability status of a family member who is temporarily disabled, as the parent caring for the disabled family member would become a work-eligible individual once the family member is no longer disabled.**

The following internal controls are currently in place and are designed to ensure that the established work verification procedures are being properly employed.

##### **Training:**

1. ODJFS conducted multiple statewide meetings with all CDJFS to convey the interim and final federal regulations including CRIS-E system changes and guidance on the state of Ohio Work Verification Plan. ODJFS conducted a video conference with the CDJFS when the final TANF rules were issued. When the transmittal letter was issued in September 2008, ODJFS provided an overview of the provisions to the CDJFS in another video conference.
2. ODJFS will continue to provide comprehensive guidance and technical assistance to all CDJFS through on-going trainings, workshops, policy letters, and on-site monitoring to ensure compliance with federal and state requirements.

##### **Case review:**

3. ODJFS has a monitoring process in place to ensure adherence to procedures by CDJFS agencies and their contracted providers. In December, 2006 ODJFS began a monthly review of randomly selected cases to monitor accuracy in reporting of work activities and hours on the TANF Data Report. Approximately 75 cases are selected monthly for review. This review has targeted work-eligible individuals as well as non-participants contained in "child only" AGs (i.e., non-recipient parents receiving SSI, an ineligible alien due to immigration status, etc.). The review validates the reported work participation status and related eligibility information contained in CRIS-E and the county case

file. In addition, ODJFS will continue reviewing a sample of sanctioned cases to determine appropriate exclusion from work participation reporting.

**Monitoring county performance:**

4. ODJFS remains in constant contact with CDJFS unable to meet work activity performance standards. ODJFS conducts routine consultation visits with the CDJFS reviewing work activity data and county procedures as well as providing assistance in developing strategies until work activity standards can be met.

**Review of work-eligible individual status:**

5. Reapplication of eligibility for OWF is required at least every twelve months for AGs that include a work-eligible individual and every twenty-four months for child only AGs (no work-eligible individuals). Included in the process is a review of each individual's work-eligible status. Appraisals and assignments can be amended at any time in between the required 12 month review. Many of the CDJFS have access to the TALX system to verify employment for individuals who are work-eligible individuals.

**Data exchange:**

6. ODJFS currently receives information through data exchange from various state and federal agencies. In September 2008, Ohio began participation in the PARIS program, which includes out of state information and Veterans' Administration and Federal employment benefits.

- 2. Describe the internal controls to control for data errors, including transcription and coding errors, data omissions, computational errors, and compilation errors. For example, a State might automatically review the case record of each work-eligible individual whose reported average weekly hours of participation are unusually high (e.g., 70 or more hours per week) by examining the documentation used to support those hours.**

ODJFS will identify patterns, trends, and frequency of errors to improve system programming, input processes and compliance with requirements.

The department has developed a TANF Federal Reporting Team with representatives from appropriate offices. The team meets to examine all data elements to ensure accurate data reporting. This is a system analysis process, where program code is reviewed and corrections are implemented.

ODJFS Quality Control (QC) staff evaluates the accuracy of OWF payments, which includes compliance with the self-sufficiency contract and work participation requirements. ODJFS technical assistance (TA) staff provide TANF training and technical assistance to all CDJFS. The QC review information is provided to the CDJFS and ODJFS TA staff. TA staff use the information to identify target areas for training and technical assistance.

Quarterly TANF reports are submitted to HHS. When an error is identified and a report is sent back, ODJFS investigates the reason for the error and, if a fatal error, acts to correct the error immediately. In addition, as reports are generated, ODJFS looks for data anomalies. The same process will be used for the SSP-MOE report.

Preliminary TANF reports are generated monthly and issued to the CDJFS. The CDJFS is responsible for reviewing the preliminary reports for completion and correctness. The CDJFS is responsible to ensure all corrections are made prior to the issuance of the final report. Any data entry error information goes to the training and technical assistance sections for dissemination to the counties.

- 3. Describe the checks used to isolate electronic systems and programming errors and the steps to ensure that all work participation report items are internally consistent. For example, a State might obtain the raw data (prior to input into an automated data processing system) for a sample of work-eligible individuals and determine manually the average weekly hours of participation for each work activity for a month and compare that result to what the State actually reported to HHS.**

The CRIS-E system has controls in place that ensure all required data elements are completed and that only pre-determined acceptable data can be entered into the data fields. In addition, CRIS-E has an automated alert process for notification to county staff of error prone situations. In the event the alert is unresolved, ODJFS has included an escalation process within CRIS-E to alert appropriate supervisors and administrators.

As part of the process to ensure that all work participation report items are internally consistent, all programming and system updates are run through a series of testing environments by staff experienced in both programming and policy regulations before being added to CRIS-E.

- 4. Describe any sampling and estimation techniques employed in data validation. The Work Verification Plan should document the soundness of all statistical procedures utilized in the verification process. All estimation techniques must be reasonable and fully described in the plan. For estimates based on sampling or other statistical techniques, the plan must contain, as appropriate, the step-by-step computations of precision, affirming that the produced estimates are within statistically acceptable levels of reliability and validity.**

The sampling technique utilized by ODJFS in data validation is a systematic sampling method. The TANF Sampling and Statistical Methods Manual from HHS dated October 1999 is the foundation of our sampling methodology. Starting with October 2011, the average universe is 295 cases monthly. Using a 90% confidence level with a less than 5% error rate yields a required annual sample size of 1,500, with a monthly sample size of 75 cases to be reviewed. A random start and interval will be utilized to pull the cases each month.

## **V. Verification of Other Data Used in Calculating the Work Participation Rates**

**Under the “complete and accurate” standard for data reporting, States should validate all data submitted in its TANF Data Report and, if applicable, the SSP-MOE Data Report. In addition to the work activities, the following data elements are used in calculating the work participation rates:**

- Reporting Month**
- Stratum**
- Case Number**
- Disposition**
- Type of Family for Work Participation**
- Amount of Food Stamps Assistance**
- Receives Subsidized Child Care**
- Amounts of TANF (and SSP-MOE) Assistance**

- **Family Affiliation Code**
- **Non-custodial Parent Indicator**
- **Date of Birth (Adult)**
- **Relationship to Head-of-Household**
- **Parent with Minor Child**
- **Work-Eligible Individual Indicator**
- **Date of Birth (Child)**

**The Work Verification Plan should contain the procedures needed to establish that the State has the capacity to breakout TANF families with a work-eligible individual by the case characteristics that relate to the special rules and conditions of participation, such as receipt of child care, age of child, age of adult or teen parent, number of months under a sanction, adult or teen parent with satisfactory school attendance, and families with a disabled family member (adult or child).**

**Documentation:**

- 1. For each of the above data elements, describe the State’s data validation procedures to ensure “complete and accurate” data reporting.**

All of the above listed elements are included in a preliminary statewide monthly work participation detail report. The preliminary report is reviewed by both county and state staff to ensure the accuracy of the above listed data elements, correct reporting of work-eligible individuals and hours of work participation and any automated system anomalies.

Time is allowed for inaccurate data to be corrected prior to the extract of the final statewide monthly work participation detail report. The data used for the TANF Data Report transmitted to ACF is a sample of the statewide data.

ODJFS validates the accuracy of the data elements contained in the TANF Data Report on a monthly basis. A sample of the TANF Data Report is reviewed to validate the information entered by the CDJFS into the automated system and compared to documentary evidence to ensure accuracy.

- 2. Describe any procedures employed to eliminate data inconsistencies between two or more data elements.**

When the Data Error Report is received from HHS, the errors are analyzed and the system checked for any relevant programming errors. The report data is reviewed to check for anomalies. ODJFS will consider adding future tests of the data generated by the program parameters of the TANF Data Report to place reliance on the report submitted to HHS.

**Work Participation Status**

- 1. 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.**

The ODJFS CRIS-E system uses a set of codes to identify each individual’s PSC. In the case of a single custodial parent with a child under age one; the individual would be coded as a D3. The state CRIS-E system includes fields that flag the duration of the 12 month lifetime exclusion for those individuals coded as a D3. An extract is taken from the system and the data is processed further to



meet the Federal Reporting requirements (3734 process). The 12 month limit counter is applied to those coded as D3. ODJFS Office of Information Systems maintains a counter file for all AGs with a child under age 1 that are coded D3. When an individual hits the 12 month limit, the programming in the 3734 process returns them to the denominator.

**2. Describe the State's 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.**


The ODJFS CRIS-E system includes fields that track a sanctioned AG. An extract is pulled from the system (3734 process) which includes programming that removes the appropriately coded AG from counting in the denominator for three months. After three months, the AG is returned to the denominator count beginning the fourth month.

**3. Describe the State's 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.**

The ODJFS CRIS-E system uses a set of codes to identify each individual's PSC. The D6 participation status code identifies a single custodial parent or caretaker relative with a child under age six. If an individual with a D6 PSC is participating or working the required 20 hours, they are reported in the TANF Data Report or the SSP-MOE Data Report as meeting the federal requirement.

## VI. Certification of Completeness

This is to certify that Ohio's TANF Work Verification Plan dated January 1, 2012 includes all of the information required by the regulations at 45 CFR 261.62(b) and accurately reflects the provisions under which Ohio will be operating effective January 1, 2012.

A handwritten signature in cursive script that reads "Trudie J. Bormann". The signature is written in black ink on a light-colored background.

Trudie J. Bormann, IV-A Administrator