



STATE OF CONNECTICUT
DEPARTMENT OF SOCIAL SERVICES
55 FARMINGTON AVENUE • HARTFORD, CONNECTICUT 06105

September 29, 2017

Clarence Carter, Director
Administration for Children and Families
Office of Family Assistance, 5th Floor East
370 L'Enfant Promenade, S.W.
Washington, D.C. 20447-0001

Re: TANF Work Verification Plan Submission

Dear Mr. Carter:

Enclosed please find Connecticut's Work Verification Plan for the Temporary Assistance for Needy Families Program dated September 29, 2017 with an effective date of October 1, 2017.

This version incorporates the following changes:

- **Page 36 – Changed Workforce Investment Act to WIOA –WIOA is the federal law and successor to WIA**
- **Page 36 – Added ImpaCT to EMS so it now reads EMS/ImpaCT – ImpaCT is the new DSS eligibility computer system replacing EMS.**
- **Changed all dates to Oct 1, 2017 – we did this to coincide with our new 3-year plan that will also take effect on October 1, 2017**

This letter further certifies that the Connecticut's TANF Work Verification Plan includes all the information required by the Regulations at 45 CFR 261.62(b) and accurately reflects the provisions under which Connecticut will operate effective October 1, 2017.

An electronic version was sent to the ACF Boston Regional 1 office. Please contact me at 860-424-5006, if you have any questions regarding this submission.

Sincerely,

Peter Palermينو, Program Manager
Division of Eligibility Policy & Program Support

Enclosures

cc: Sharon Renscko, Program Specialist, ACF, Region 1
Michael Bartley, Program Manager, CT Department of Labor
Janel Simpson, Deputy Commissioner

State of Connecticut
Department of Social Services

**Temporary Assistance for Needy Families
(TANF) Work Verification Plan**

Submitted to the
U.S. Department of Health and Human Services

Effective: October 1, 2017
Submitted: September 29, 2017

State of Connecticut
Department of Social Services
Temporary Assistance for Needy Families (TANF)

Work Verification Plan

Table of Contents

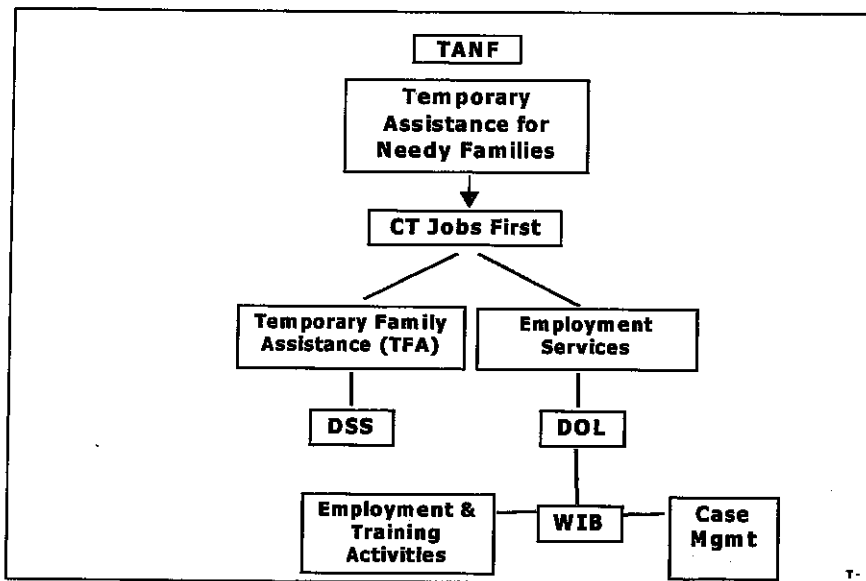
<u>Section</u>	<u>Page Number</u>
I. Introduction	3
II. Countable Work Activities, Definitions, and Hours Engaged in Work	4
1. Unsubsidized Employment	5
2. Subsidized Private Sector Employment	8
3. Subsidized Public Sector Employment	8
4. On-the-Job Training	10
5. Job Search and Job Readiness Assistance	12
6. Work Experience	16
7. Community Service Programs	17
8. Vocational Educational Training Not to Exceed 12 Months	19
9. Child Care for an Individual Participating in a Community Service Program	22
10. Job Skills Training Directly Related to Employment	23
11. Education Directly Related to Employment	25
12. Satisfactory Attendance at Secondary School or in a GED Program	27
III. Work-Eligible Individual	29
IV. Internal Controls	34
V. Verification of Other Data Used in Calculating the Work Participation Rates	42
VI. Certification	45
Attachment A - Connecticut's Eligible Training Providers List	

Page Intentionally Blank

I. Introduction

Connecticut's Jobs First Program

Background



Jobs First is the name of Connecticut's TANF cash assistance and employment services program. The cash assistance portion is called Temporary Family Assistance (TFA) and is administered by the Department of Social Services (DSS). The Jobs First Employment Services Program (JFES) is administered by Connecticut's Department of Labor (DOL). The DOL contracts with the five regional Workforce Development Boards (WDBs) to provide employment and training activities including case management services, job readiness, job search and placement services for JFES participants. The WDBs arrange for these services and activities through contracts and agreements with local service and training providers and through the issuance of Individual Training Accounts (ITAs).

Eligibility Services Specialists (ESS) at DSS determine eligibility for TFA in the DSS business system, identify individuals in the family required to participate in JFES, conduct an initial assessment and administer the sanctioning policy which reduces or discontinues TFA benefits for families not cooperating with JFES. Individuals required to participate in JFES are scheduled for a JFES orientation at the local *American Job Centers*.

An employment plan is developed by the JFES staff at the orientation. The JFES staff is responsible for assignment to activities and ongoing case management for JFES participants in the DOL business system. The work verification and data validation processes are described in greater detail further in this document.

II. Countable Work Activities, Definitions, and Hours Engaged in Work

Activity Categories

1. Unsubsidized Employment
2. Subsidized Private Sector Employment
3. Subsidized Public Sector Employment
4. On-the-Job Training
5. Job Search and Job Readiness Assistance
6. Work Experience
7. Community Service Programs
8. Vocational Educational Training Not to Exceed 12 Months
9. Child Care for an Individual Participating in a Community Service Program
10. Job Skills Training Directly Related to Employment
11. Education Directly Related to Employment
12. Satisfactory Attendance at Secondary School or in a GED program

1. Unsubsidized Employment

- **Services and Programs:** Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal Definition of the activity.)

State/Federal Definition: Full- or part-time employment in the public or private sector that is not subsidized by TANF or any other public program.

- **Determination of Countable Hours:** 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.

New Employment: We use a wage statement, pay stub or other employer-issued written documentation substantiating the number of hours worked for the first full representative week of employment and project these weekly hours to the next six months by applying this weekly number of hours to every week for the next six months. We use verbal confirmation from employer earnings and hours worked only if a pay stub or other written documentation cannot be obtained. If documentation is not representative of continuing circumstances, we use actual hours until a representative period is determined. Any time we receive information that the weekly projected hours of work have changed, we use the procedures for determining hours of participation under “on-going employment” below.

On-going Employment: We use pay stubs or other employer-issued written documentation for the last four-week period to determine average weekly hours and project these weekly hours for the next six months. This average weekly hours figure is applied to every week for the next six months. If documentation is not representative of continuing circumstances, we use actual hours until a representative period is determined. Any time we receive information that the weekly projected hours of work have changed, we recalculate the average weekly projected hours of employment.

Self-employment: Connecticut rarely allows self-employment to continue as an activity and instead requires that the client participate in other countable activities. In the rare event that self-employment is assigned as an activity, the JFES staff determines the number of hours based on an interview with the client and a review of their business records. We verify gross income from business records and/or tax records, subtract allowable business expenses and divide by Federal minimum wage to determine the number of countable hours. This method of determining gross income and expenses for self-employment is the same method that the state uses to determine eligibility for TANF benefits. The DSS eligibility staff initially determines and verifies income and hours based on business and/or tax records.

Unsubsidized Employment (Continued)

- *Verification of Actual Hours: 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.*

New Employment: For those employed prior to referral to Jobs First Employment Services (JFES), the Department of Social Services (DSS) worker obtains verification of hours from pay stubs or other written documentation from the employer, and enters the hours/wage information on the DSS business system. The paper documentation is retained in the DSS client case file. Upon enrolling the client into JFES, the JFES staff also obtains verification of hours from pay stubs or other written documentation from the employer and enters the hours in the DOL business system. Plans are to allow JFES staff to retrieve the employment information including, verified weekly hours, from DSS and DOL business system interface, which will eliminate having to verify employment hours again.

When new employment occurs after referral to JFES, the DSS worker or JFES staff (whomever learns of the employment first) obtains a pay stub or other written documentation from the employer, records the information into their respective business systems and notifies the other agency's worker of the entered information through email. The paper documentation is retained in the respective agency's client case file. Per ACF General Comments on Work Verification Plan, the written documentation of unsubsidized employment hours will be obtained from the employers and will include the participant's name, actual hours of work and the name of the employer.

On-going employment: For participants who are also SNAP recipients, the DSS worker verifies actual hours at each 6-month or 12-month review. Pay stubs or other employer-issued written documentation for the last four-week period are used to verify average weekly hours and projected hours for the next six months. Actual hours and wages are entered in the DSS business system. JFES staff verify the actual hours of employment through pay stubs or other employer-issued written documentation for the last four weeks to determine average weekly hours and record the weekly hours in the DOL business system. The schedule includes actual start and end dates, which are entered in the DOL business system by JFES staff only after the participant actually begins or ends the activity. The paper documentation is retained in the JFES participant case file.

Employment information that is entered into the DSS business system by the DSS worker is communicated to the JFES staff based on local office procedures (email, mail or facsimiles). The paper documentation received by the DSS worker is retained in the DSS client case file.

Unsubsidized Employment (Continued)

The written documentation of unsubsidized employment hours is obtained from the employers and includes the participant's name, actual hours of work and the name of the employer.

Self-Employment: We verify gross income from business records and/or tax records and subtract allowable business expenses and divide by the Federal minimum wage to determine countable hours of work. These hours are projected for the next six months. The paper documentation is retained in the JFES client case file. This method of determining gross income and expenses for self-employment is the same method that the state uses to determine eligibility for TANF benefits.

- ***Methods of Daily Supervision: Describe the methods of daily supervision for each unpaid work activity.***

Not Applicable

- ***"Holiday and excused absence" policy.***

Employer paid holidays and paid leave, as documented by wage statement, pay stub or other employer issued written documentation, are countable hours.

2. and 3. Subsidized Private and Public Sector Employment

- **Services and Programs:** Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal Definition of the activity.)

State/Federal Definition: Employment in the private and public sectors 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. This includes work-study and stipend programs.

Description of Program/Services: Subsidized Private and Public Sector Employment is paid work activity in the private or public sectors, which is intended to improve the employability of individuals not otherwise able to obtain unsubsidized employment. This activity is intended to provide participants with valuable job-readiness skills and work experience that can be applied toward the obtainment of unsubsidized employment. Because participants are paid hourly wages, the number of hours assigned is limited to ensure that this activity does not negatively affect eligibility for TANF cash benefits. Generally, subsidized employment is limited to 20 hours per week or less and is provided in conjunction with other activities such as adult basic education, GED preparedness, ESL, occupational skills training and/or life skills training. Work activities are combined with other activities in such a way as to meet the individuals' needs while meeting the work participation requirements. Generally, subsidized employment does not exceed nine months in duration.

There are two separate subsidized employment models utilized in Connecticut:

A. Private non-profit or for-profit employers place JFES participants on their payroll and are subsidized 100% of the participants' wages by program operators. Wages are no less than the state's minimum wage for approximately 20 hours per week. Some positions may require that JFES participants be paid at higher level than minimum wage, if JFES participants are similarly situated in similar occupations by the same employer and have similar training, experience and skills as co-workers. If based on the employers' policies the JFES participant is eligible for employee benefits (such as health insurance), they will receive them.

B. Contracted service providers act like a temporary staffing agency, serve as the employer of record, are paid a fee to place JFES participants in subsidized employment, and cover the participants' salaries. Wages are no less than the state's minimum wage for approximately 20 hours per week. Some positions may require that JFES participants be paid at higher level than minimum wage, if JFES participants are situated in similar occupations by the same employer and have similar training, experience and skills as co-workers. If, based on the employer's (contracted service provider) policies the JFES participant is eligible for employee benefits (such as health insurance), they will receive them.

Subsidized Private and Public Sector Employment (Continued)

All employment activities are provided in accordance with the provisions of the Fair Labor Standards Act and Connecticut General Statutes Sec. 31-222. All employment activities are provided in accordance with the non-displacement provisions referenced in Section 407 within Title IV of the Social Security Act, as amended.

- ***Determination of Countable Hours:*** 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.

Upon completion of one full week of subsidized employment, weekly hours of participation are determined and projected for the next 6 months. Any time the JFES staff changes the weekly assigned hours or receives information that the weekly hours have changed, the projected weekly hours of employment will be adjusted to reflect the change.

- ***Verification of Actual Hours:*** 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.

JFES staff verifies the actual weekly hours of employment through pay stubs or other written employer-issued documentations and records the weekly hours in the DOL business system. The schedule includes actual start and end dates, which are entered in DOL business system by JFES staff only after the participant actually begins or ends the activity.

Under model B described above, whenever the employment site is not the employer of record, paper documentation of the number of hours of participation in the work activity include attendance records by the employer site supervisor. JFES staff verify the actual weekly hours of employment through attendance records from the employment site, pay stubs or other written employer-issued documentation and records the weekly hours in DOL business system. The schedule includes actual start and end dates, which are entered in DOL business system by JFES staff only after the participant actually begins or ends the activity.

The written documentation of subsidized employment hours is obtained from the employers and includes the JFES participant's name, actual hours of work and the name of the employer. Paper documentation will be retained in the JFES participant case file.

- ***Methods of Daily Supervision:*** Describe the methods of daily supervision for each unpaid work activity. Not applicable
- ***"Holiday and excused absence" policy.***
Employer paid holidays and paid leave, as documented by wage statement, pay stub or other employer issued written documentation, are countable hours.

4. On-the-Job Training

- ***Services and Programs:*** Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal Definition of the activity.)

State/Federal Definition: 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 of the job.

Description of Program/Services: On-the-Job Training (OJT) is paid employment provided by a public or private employer through a contractual arrangement in which the employer provides training and skills essential to perform the job. OJT is distinguished from subsidized employment by the inclusion of a training plan. The OJT training is either a formal program or structured job training that provides specific occupational skills required of the job, but not currently possessed by the JFES participant. At the onset of the OJT, a training outline/plan is created which specifies the duration of training and an explanation of how this time period was determined. Generally, employers are reimbursed approximately 50% of the participants' wages during the time period of job training.

All employment activities are provided in accordance with the provisions of the Fair Labor Standards Act and Connecticut General Statutes Sec. 31-222. All employment activities are provided in accordance with the non-displacement provisions referenced in Section 407 within Title IV of the Social Security Act, as amended.

- ***Determination of Countable Hours:*** 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.

Upon completion of one full week of OJT, weekly hours of participation are determined and projected for the next 6 months. Any time the JFES staff changes the weekly assigned hours or receives information that the weekly hours have changed; the projected weekly hours of employment are adjusted to reflect the change.

- ***Verification of Actual Hours:*** 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.

JFES staff verifies the actual weekly hours of employment through pay stubs or other written employer-issued documentations and records the weekly hours in DOL business system.

The schedule includes actual start and end dates, which are entered in DOL business system by JFES staff only after the participant actually begins or ends the activity.

On-the-Job Training (Continued)

Per ACF General Comments on Work Verification Plan, the written documentation of unsubsidized employment hours will be obtained from the employer and will include the JFES participant's name, actual hours of work and the name of the employer. Paper documentation will be retained in the JFES participant case file.

Special Documentation required in Work Verification Plan: The OJT training is either a formal program or structured job training that provides specific occupational skills required of the job, but not currently possessed by the JFES participant. At the onset of the OJT, a training outline/plan is created which specifies the duration of training and an explanation of how this time period was determined.

- ***Methods of Daily Supervision: Describe the methods of daily supervision for each unpaid work activity.***

Not applicable

- ***"Holiday and excused absence" policy.***

Employer paid holidays and paid leave, as documented by wage statement, pay stub or other employer issued written documentation, are countable hours.

5. Job Search and Job Readiness Assistance

- **Services and Programs:** Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal Definition of the activity.)

State/Federal Definition: The act of seeking or obtaining employment, preparation to seek or obtain employment, including life skills training, and short term substance abuse treatment, mental health treatment, housing assistance and/or rehabilitation activities. Such treatment or therapy must be determined to be necessary and documented by a qualified medical, substance abuse or mental health professional. Job search and job readiness assistance activities must be supervised by the TANF agency or other responsible party on an ongoing basis no less frequently than once each day in which the individual is scheduled to participate.

This activity is limited by statute to count toward the work participation rate for no more than six weeks per year (no more than four weeks may be consecutive to count toward the work participation rates).

Description of Program/Services: Connecticut Department of Labor provides the majority of job search and job readiness assistance to JFES participants through contracts with the local Workforce Development Boards. These services are provided in many of the local American Jobs Centers, which is also the location for many of the JFES staff.

Employment services are generally provided for 30 hours per week except when combined with other activities such as part-time employment.

There are a variety of job search and job readiness services available. Services are provided to meet the individual needs of the participants and may include the following:

1. **Job Search Skill Training** - Series of modules presented in a group workshop setting over a one week period that provide instruction on the following topics:
 - Motivational/esteem building exercises
 - World of work orientation
 - Employer expectations
 - Researching jobs and industries
 - Identifying job leads
 - Applying for jobs, interviews
 - Follow-up on job applications and interviews
 - Financial literacy
 - Use of the Internet in conducting job searches

Job Search and Job Readiness Assistance (Continued)

2. Individual Structured Job Search - Individualized assistance with job search efforts including, at minimum, bi-weekly in-office appointments to provide the following:

- Employment-related assessment
- Exploration of individual's local employment options
- Providing employer contact information
- Assistance with completing job applications
- Assistance with preparing for job interviews & resume development
- Follow-up with and feedback on results of employment search/job interviews
- Assistance with resource library
- Career counseling

3. Job Development and Placement

4. Supervised Participant Support Groups

5. Other Services and Employment Workshops include:

- Vocational Exploration
- Life Skills as Related to Employment
- Financial Literacy
- Securing Stable Housing

6. Vocational Rehabilitation Services provided by local Department of Rehabilitation Services (DORS) staff

- ***Determination of Countable Hours:*** 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.

Weekly hours are assigned by JFES staff and entered in DOL business system. The schedule includes actual start and end dates, which are entered by JFES staff only after the JFES participant actually begins or ends the activity. Only actual verified hours of participation in job search activities are entered onto the attendance record in DOL business system, which allows for the number of hours and weeks per JFES participant per rolling 12-month period to be recorded and tracked by all users of the system.

Hours in this activity are limited by statute to count toward the work participation rate for no more than six weeks at 30 hours per week (or 20 hours for family with a single parent and a child under six years) or a total of 120/180 hours per preceding 12 months (20 hours is considered one week, and reporting any hour in a week toward countable hours uses a week of participation. No more than four weeks may be consecutive to count toward the work participation rates.).

Job Search and Job Readiness Assistance (Continued)

JFES staff record verified hours of actual daily participation on a calendar function on DOL business system. The limits on the hours of Job Search/Job Readiness are applied to each monthly sample. The hours of participation in the fifth week or beyond six weeks are not reported.

- *Verification of Actual Hours: 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.*

All daily job search and job readiness activities conducted in and out of the local American Job Centers are documented on the a weekly job log. Actual hours of participation in this activity have been verified and reported for the work participation sample cases.

When documenting job search activities on the job log, the JFES participant must enter a detailed description of the specific daily activities including reviewing of the job wanted advertisements in the newspapers, using of the Internet to lookup and apply for jobs, phoning employers, interviewing with employers, utilizing American Job Centers resource materials, composing resumes and cover letters, completing job applications, reviewing daily job listings, faxing and/or mailing information to employers, viewing job search videos, attending appointments with employment services JFES staff, attending job readiness workshops and documenting efforts to secure stable housing. Detailed information regarding employer contacts must be entered onto the log. This information includes: company name, address, contact person and phone number, type of work sought, how the employer was contacted (job application, cover letter, resume, phone contact or in person interview) and the employer's email address or fax number. Time spent doing each of these activities must be listed on the log. When the logs are incomplete or verification does not validate the activity, we will not report the hours for the work participation rate.

The weekly job logs are signed by the participant and reviewed and signed by JFES staff or a supervisor and kept in the client's case file. The JFES staff ensure the accuracy of the reported information by conducting random reviews to confirm that the information on the forms is accurate. When doing the random reviews, if there is an established relationship between the agency staff doing the reviews and the employer, the employer is contacted to verify that the information on the job log is accurate. If there is no relationship between the employment staff and the employer, the employer is not contacted in order to avoid jeopardizing the participant's chances of being hired.

Time spent looking for employment via the Internet in the American Job Centers is supervised by JFES staff. Time spent looking for employment via the Internet outside of the American Job Centers is verified by screen prints of the websites, job postings, job applications and/or email confirmation of receipt of job applications.

Attendance at workshops is recorded in DOL business system on an attendance roster. JFES staff record into DOL business system only verified hours of actual daily participation as documented on the job logs.

Job Search and Job Readiness Assistance (Continued)

Special Documentation required in the Work Verification Plan: Effective 10/1/08, when determined necessary, short-term substance abuse treatment, mental health treatment, or rehabilitation activities will be included as allowable activities. Such treatment or therapy must be determined to be necessary by a qualified medical or mental health professional. As needed, documentation of the diagnosis, treatment plan and attendance is captured either on the providers' forms or on the JFES behavioral health release and turn around document.

- **Methods of Daily Supervision:** Describe the methods of daily supervision for each unpaid work activity.

JFES staff meets with the JFES participant at least once bi-weekly to supervise daily individual job search activities and to verify daily hours of participation. Supervision includes discussing the participant's activities as recorded on the job log and providing suggestions, recommendations and encouragement to improve job search efforts. Job Search activities such as attendance at workshops and use of American Job Centers resources are supervised by JFES staff.

Time spent looking for employment via the Internet in the American Job Centers is supervised by employment services JFES staff in the American Job Centers. Time spent looking for employment via the internet outside of the American Job Centers is verified by screen prints of the websites, job postings, job applications and/or email confirmation of receipt of job applications and reviewed and discussed with the JFES staff during the bi-weekly meetings.

- **"Holiday and excused absence" policy.**

Holidays (based on federal limit of 10 per year)

- | | |
|---------------------------|----------------------------------|
| 1. New Years Day | 6. Labor Day |
| 2. Martin Luther King Day | 7. Columbus Day |
| 3. Presidents Day | 8. Thanksgiving Day |
| 4. Memorial Day | 9. Friday after Thanksgiving Day |
| 5. Independence Day | 10. Christmas |

Excused Absences for Job Search Activities (no more than 80 hours in the preceding 12- month period, 16 hours per month) include:

- | | |
|---|--|
| - Illness-own/ family member | - Family emergency |
| - Medical appointment | - Unavailability of child care |
| - Hazardous weather | - Unavailability of transportation. |
| - Office closings | - Domestic violence |
| - Unavoidable conflict such as
auto accident, court appearance, etc. | - Funeral |
| - Immediate treatment for injury | - Holiday observed by provider or JFES
participant but not one of the 10
approved holidays |
| - Early dismissal | |
| - Attending a child's school activity | |

6. Work Experience

- **Services and Programs:** Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal Definition of the activity.)

State/Federal Definition: A work activity performed in return for welfare, that provides an individual with an opportunity to acquire the general skills, training, knowledge and work habits necessary to obtain employment. The purpose of work experience is to improve the employability of those who cannot find unsubsidized employment. This activity must be supervised by an employer, work site sponsor or other responsible party on an ongoing basis no less frequently than once each day in which the individual is scheduled to participate.

Description of Program/Services: Currently, we do not use this activity in our program. If we decide to create Work Experience activities, we will submit a revised plan.

- **Determination of Countable Hours:** 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.

Not applicable

- **Verification of Actual Hours:** 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.

Not applicable

- **Methods of Daily Supervision:** Describe the methods of daily supervision for each unpaid work activity.

Not applicable

- **“Holiday and excused absence” policy.**

Not applicable

7. Community Service Programs

- **Services and Programs:** Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal Definition of the activity.)

State/Federal Definition: Structured programs in which TANF recipients perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. 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 and rural redevelopment, welfare, recreation, public facilities, public safety and childcare. Community service programs are designed to improve the employability of recipients not otherwise able to obtain employment, and must be supervised on an ongoing basis no less frequently than once each day in which the individual is scheduled to participate. A state agency shall take into account, to the extent possible, the prior training, experience and skills of a recipient in making appropriate community service assignments.

Description of Program/Services: In order for community service hours to count, the customer must be in a position that serves a useful community purpose. The community services sites are in one of the following fields: health, social service, environmental protection, education, urban and rural redevelopment, welfare, recreation, public facilities, public safety or childcare and the activity must improve the employability of recipients not otherwise able to obtain employment.

The community services site positions directly benefit the community by supporting health care workers in hospitals or other community health settings; being classroom aides in public schools, Head Start centers, non-profit preschools; monitoring recess at public schools; cooking, cleaning or serving food in public school cafeterias and/or soup kitchens; sorting and distributing clothing donations at clothing banks, sorting and distributing food donations at food banks; providing clerical assistance in various social services, public services and faith-based offices; assisting in supervising children in public or faith-based recreational activities; cleaning and monitoring public or faith-based facilities, and assisting adult class room instructors in non-profit training facilities.

These activities increase the employability of the JFES participants by providing work experience that they otherwise would not have. This activity provides JFES participants who have little or no work experience with the soft skills necessary to keep a job. This work experience is used on resumes and job applications to help the JFES participant obtain an unsubsidized job.

- **Determination of Countable Hours:** 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.

Only verified actual hours of participation in community service are recorded in the DOL business system attendance record and reported as countable hours.

Community Service Programs (Continued)

- **Verification of Actual Hours:** 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.

Actual hours of participation in community service is documented on an attendance form by the site supervisor and submitted to JFES staff. The form is kept in the JFES participant's file.

Special Documentation required in Work Verification Plan: Community Services is always voluntary. Participation in such activities is never required. Clients who fail to participate for the number of hours of community service in which they originally agreed are not sanctioned. Instead, their employment plan assignment is changed to an activity that is mandatory. Connecticut does not use the deeming provision under FLSA.

To be included as a countable activity, a community service position is reviewed and documented to provide direct community service and improve the recipient's employability.

- **Methods of Daily Supervision:** Describe the methods of daily supervision for each unpaid work activity.

Participants of community service are supervised daily by a designated person at the community service site. The hours of community service performed are documented on a form by the designated person. These forms are kept in the participants' files.

- **"Holiday and excused absence" policy.**

Holidays (based on federal limit of 10 per year)

- | | |
|---------------------------|----------------------------------|
| 1. New Years Day | 6. Labor Day |
| 2. Martin Luther King Day | 7. Columbus Day |
| 3. Presidents Day | 8. Thanksgiving Day |
| 4. Memorial Day | 9. Friday after Thanksgiving Day |
| 5. Independence Day | 10. Christmas |

Excused Absences (no more than 80 hours in the preceding 12- month period, 16 hours per month) include:

- | | |
|---------------------------------------|--|
| - Illness-own/ family member | - Unavoidable conflict such as auto accident, court appearance, etc. |
| - Job interviews | - Unavailability of child care |
| - Medical appointment | - Unavailability of transportation |
| - Hazardous weather | - Domestic violence |
| - Office closings | - Funeral |
| - Specific job-related exam | - Holiday observed by provider or JFES participant but not one of the 10 approved holidays |
| - Immediate treatment for injury | |
| - Early dismissal | |
| - Attending a child's school activity | |
| - Family emergency | |

8. Vocational Educational Training Not to Exceed 12 Months

- **Services and Programs:** Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal Definition of the activity.)

State/Federal Definition: Organized educational programs that are directly related to the preparation of individuals for employment in current or emerging occupations requiring training. Vocational educational training must be supervised on an ongoing basis no less frequently than once each day in which the individual is scheduled to participate and may include work-focused general education and language instruction.

Description of Program/Services: Vocational Educational training is formal occupational skills training conducted in a classroom or workplace setting or combination of the two and designed to meet the specific needs of the local JFES population. Program operators conduct periodic needs analysis of the labor market and JFES participants in order to identify the vocational skills that are in demand in their region and the training and/or educational needs of the participants in order to acquire these vocational skills. Vocational education training is provided by educational and training organizations, vocational-technical schools, community colleges, post secondary institutions, proprietary schools, and community based organizations.

Vocational education activities are generally limited to less than 10 months. As of July 1, 2010, vocational education may include participation in two and four year degree programs, in accordance with Connecticut General Statutes. However, they most commonly range from three to nine months in duration.

Training is also provided through Individual Training Accounts (ITA). Utilization of ITAs provides for more individual choice and is more economical since training is paid for as needed on an individual basis. Once the need for training is established and the type of training is determined, participants who are eligible for ITAs or training vouchers may choose the specific training program and provider from Connecticut's Program Education and Training Provider List (ETPL). The webpage <http://www1.ctdol.state.ct.us/etpl/Index.asp> has the updated list. A sample of the ETPL is included in this plan as Attachment A.

As needed, adult basic education is embedded within the vocational education training activity. It is delivered in an employability context concurrently with vocational skills instruction. When needed, remedial education or ESL is provided as a component of vocational education in order to better prepare participants for the labor market by giving them the opportunity to apply their learning in the context of their future job.

Vocational Educational Training Not to Exceed 12 Months (Continued)

- ***Determination of Countable Hours:*** 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.

The vocational education training weekly schedule is entered in DOL business system by the JFES staff. Actual start and end dates are entered only after the participant actually begins or ends the activity.

JFES staff obtain attendance records of participants of vocational education training from training providers. JFES staff do not record the attended hours in the DOL business system attendance record until they receive verification from the training provider. Countable hours include hours spent in class, performing clinical requirements and lab work; hours spent participating in supervised homework time and up to one hour of unsupervised homework time for each hour of class is counted for a total homework time not to exceed the hours required or advised by the particular educational program, as substantiated by the training provider.

The JFES program requirements prohibit participants from receiving more than 12 months of vocational education while in the program. This prohibition also applies to participants enrolled in post-secondary degree programs. Most vocational education is limited to 10 months or less and generally participants who previously completed training while in the JFES program are not allowed to participate in additional training. All JFES activities including the type and dates of participation are recorded in DOL business system. JFES staff are required to review activity history in DOL business system before assigning new activities. Therefore, no JFES participant receives more than 12 months of vocational education. In the rare occasion that a JFES participant participates in a 2 or 4 year degree program for more than 12 months, the activity is recorded in DOL business system as "Jobs Skills Training Directly Related to Employment" after the 12 month, and if possible, combined with 20 hours of a core work-related activity in order to count toward the participation rate.

Hours participating in distance learning in an approved vocational training course with an approved training provider will be included as countable hours when documented by the distance learning software.

- ***Verification of Actual Hours:*** 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.

Vocational Educational Training Not to Exceed 12 Months (Continued)

Only actual hours of participation in vocational education training as verified by training providers is recorded in the DOL business system attendance record by the JFES staff. Paper documentation is retained in the JFES participant case file.

Special Documentation required by Work Verification Plan: Vocational education activities are generally limited to less than 10 months. Generally, they are three to nine months in duration. Remedial education or ESL is added as a component to the vocational education when the client would otherwise not be able to participate due to low math or reading scores or limited English proficiency. When remedial education and/or ESL is combined with the vocational education, it is conceptualized to be occupational specific and individualized to meet the specific needs of the participant. By combining remedial education and ESL with vocational education in this way, participants who otherwise would be capable of participating in vocational education can learn an occupational skill and become employed quicker.

- **Methods of Daily Supervision:** Describe methods of daily supervision for each unpaid work activity

Supervised by Instructor/Training provider.

- **"Holiday and excused absence" policy.**

Holidays (federal limited of 10 per year)

1. New Years Day
2. Martin Luther King Day
3. Presidents Day
4. Memorial Day
5. Independence Day
6. Labor Day
7. Columbus Day
8. Thanksgiving Day
9. Friday after Thanksgiving Day
10. Christmas

Excused Absences (no more than 80 hours in the preceding 12- month period, 16 hours per month) include:

- | | |
|---------------------------------------|---|
| - Illness-own/ family member | - Unavoidable conflict such as auto accident, court appearance, etc. |
| - Job interviews | - Unavailability of child care |
| - Medical appointment | - Unavailability of transportation |
| - Hazardous weather | - Domestic violence |
| - Office closings | - Funeral |
| - Specific job-related exam | - Holiday observed by provider or participant but not one of the 10 approved holidays |
| - Immediate treatment for injury | |
| - Early dismissal | |
| - Attending a child's school activity | |
| - Family emergency | |

9. Child Care for an Individual Participating in a Community Service Program

- **Services and Programs:** Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal Definition of the activity.)

State/Federal Definition: Providing child care to enable a JFES participant to participate in a community service program. This activity must be supervised on an ongoing basis no less frequently than once each day in which the JFES participant is scheduled to participate.

Description of Program/Services: Currently, we do not use this activity in our program. If we decide to create child care for a JFES participant in a Community Service Program activity, we will submit a revised plan.

- **Determination of Countable Hours:** 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.

Not applicable.

- **Verification of Actual Hours:** 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.

Not applicable.

- **Methods of Daily Supervision:** Describe the methods of daily supervision for each unpaid work activity.

Not applicable.

- **“Holiday and excused absence” policy.**

Not applicable

10. Job Skills Training Directly Related to Employment

- **Services and Programs:** *Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal Definition of the activity.)*

State/Federal Definition: Training or 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. Job skills training directly related to employment must be supervised on an ongoing basis no less frequently than once each day in which the JFES participant is scheduled to participate.

Description of Program/Services: Whenever a JFES participant needs a specific skill to obtain a specific job or occupation, she/he is referred to a local program provider for job skill training.

- **Determination of Countable Hours:** *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.*

The weekly schedule is entered on DOL business system. The schedule includes actual start and end dates, which are entered by JFES staff only after the JFES participant actually begins or ends the activity.

JFES staff obtain attendance records of JFES participants of job skills training directly related to employment from training provider. JFES staff do not record the attended hours in the DOL business system attendance record until they receive verification from the training provider. Countable hours include hours spent in class, performing clinical requirements and lab work; hours spent participating in supervised homework time and up to one hour of unsupervised homework time for each hour of class is counted for a total homework time not to exceed the hours required or advised by the particular educational program.

Only actual hours of participation as documented by education providers will be reported as countable hours. Hours participating in distance learning in an approved training course with an approved training provider will be included as countable hours when documented by the distance learning software.

- **Verification of Actual Hours:** *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.*

Only actual hours of participation in job skills training directly related to employment as verified by training providers is recorded in the DOL business system attendance record and reported as verified hours of actual daily participation. Paper documentation is retained in the JFES participant case file.

Job Skills Training Directly Related to Employment (Continued)

- **Methods of Daily Supervision:** Describe the methods of daily supervision for each unpaid work activity.

Supervised by Instructor/Training provider

- **"Holiday and excused absence" policy.**

1. Holidays (based on federal limit of 10 per year)
2. New Years Day
3. Martin Luther King Day
4. Presidents Day
5. Memorial Day
6. Independence Day
7. Labor Day
8. Columbus Day
9. Thanksgiving Day
10. Friday after Thanksgiving Day
11. Christmas

Excused Absences (no more than 80 hours in the preceding 12- month period, 16 hours per month) include:

- Illness-own/ family member
- Job interviews
- Medical appointment
- Hazardous weather
- Office closings
- Specific job-related exam
- Immediate treatment for injury
- Early dismissal
- Attending a child's school activity
- Family emergency
- Unavoidable conflict such as auto accident, court appearance, etc.
- Unavailability of childcare
- Unavailability of transportation
- Domestic violence
- Funeral
- Holiday observed by provider or JFES participant but not one of the 10 approved holidays

11. Education Directly Related to Employment

- **Services and Programs:** *Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal Definition of the activity.)*

State/Federal Definition: Education related to a specific occupation, job, or job offer. Education directly related to employment must be supervised on an ongoing basis no less frequently than once each day in which the JFES participant is scheduled to participate.

Description of Program/Services: Every JFES participant who is capable of taking the Connecticut Competency System (CCS) test, which is the CASAS basic appraisal of math and reading ability, is tested. The results of this test are used as an indicator as to the JFES participants' level of math and reading competency. If in order to achieve their specific employment objective, JFES participants who need to increase their math and/or reading ability, are assigned to participate in remedial education. Generally, this activity is assigned in conjunction with other "core" activities. Only JFES participants for whom adult basic education or English-as-a-Second Language (ESL) training has been identified as necessary to achieve their specific employment objective are assigned to participate in this activity.

- **Determination of Countable Hours:** *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.*

The weekly schedule is entered in DOL business system. The schedule includes actual start and end dates, which are entered by JFES staff only after the JFES participant actually begins or ends the activity.

Only actual hours of participation as documented by education providers will be reported as countable hours. Time spent participating in supervised homework time and up to one hour of unsupervised homework time for each hour of class is counted for a total homework time not to exceed the hours required or advised by the particular educational program, as substantiated by the training provider. Hours participating in distance learning with an approved on-line educational curriculum are included as countable hours when documented by the distance learning software.

- **Verification of Actual Hours:** *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.*

JFES staff obtain attendance records from training providers. Only actual hours of participation as documented by education providers will be recorded in the DOL business system attendance record and reported as verified hours of actual daily participation. Paper documentation is retained in the JFES participant case file.

Education Directly Related to Employment (Continued)

- **Methods of Daily Supervision:** Describe the methods of daily supervision for each unpaid work activity.

Supervised by Instructor/Training provider

- **"Holiday and excused absence" policy.**

Holidays (based on federal limit of 10 per year)

1. New Years Day
2. Martin Luther King Day
3. Presidents Day
4. Memorial Day
5. Independence Day
6. Labor Day
7. Columbus Day
8. Thanksgiving Day
9. Friday after Thanksgiving Day
10. Christmas

Excused Absences (no more than 80 hours in the preceding 12- month period, 16 hours per month) include:

- Illness-own/family member
- Job interviews
- Medical appointment
- Hazardous weather
- Office closings
- Specific job-related exam
- Immediate treatment for injury
- Early dismissal
- Attending a child's school activity
- Family emergency
- Unavoidable conflict such as auto accident, court appearance, etc.
- Unavailability of child care
- Unavailability of transportation
- Domestic violence
- Funeral
- Holiday observed by provider or JFES participant but not one of the 10 approved holidays

12. Satisfactory Attendance at Secondary School or in a GED Program

- **Services and Programs:** *Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal Definition of the activity.)*

State/Federal Definition: 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 work eligible individual who has not completed secondary school or received such a certificate. This activity must be supervised on an ongoing basis no less frequently than once each day in which the individual is scheduled to participate.

Description of Program/Services: Every JFES participant participates in an employment-related assessment that leads to the identification a specific employment objective and the necessary steps to achieve this objective. Whenever a high school diploma or GED is a prerequisite to the employment objective, the JFES participant is assigned to this activity. All teen parents who have not completed their secondary education are assigned to attend high school or a high school equivalency program. A “teen parent” is defined as: married or single head-of-households under 20 years old.

- **Determination of Countable Hours:** *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.*

The weekly schedule is entered in DOL business system. The schedule includes actual start and end dates, which are entered by JFES staff only after the JFES participant actually begins or ends the activity.

JFES staff obtain progress reports or report cards from the school or program on a quarterly basis or in accordance with the marking periods of the school system. Daily supervision of teen parents (students) is provided by the school or program.

- **Verification of Actual Hours:** *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.*

Attendance records will be acquired from education providers in accordance with the educational institution marking periods. Documentation shall include the name of the student, name of the educational provider or other service provider and contact information. Only actual hours of participation as documented by education providers are reported as countable hours. Supervised homework time and up to one hour of unsupervised homework time for each hour of class is counted for a total homework time not to exceed the hours required or advised by the particular educational program, as substantiated by the training provider. Retroactive adjustments to prior months submissions will be made if verification of attendance does not support the student’s claim.

Satisfactory Attendance at Secondary School or in a GED Program (continued)

- **Methods of Daily Supervision:** Describe the methods of daily supervision for each unpaid work activity.

Supervised by Instructor/Training provider.

- **“Holiday and excused absence” policy**

Holidays (based on federal limit of 10 per year)

- | | |
|---------------------------|----------------------------------|
| 1. New Years Day | 6. Labor Day |
| 2. Martin Luther King Day | 7. Columbus Day |
| 3. Presidents Day | 8. Thanksgiving Day |
| 4. Memorial Day | 9. Friday after Thanksgiving Day |
| 5. Independence Day | 10. Christmas |

Excused Absences (no more than 80 hours in the preceding 12- month period, 16 hours per month) include:

- Illness-own/ family member
- Job interviews
- Medical appointment
- Hazardous weather
- Office closings
- Specific job-related exam
- Immediate treatment for injury
- Early dismissal
- Attending a child’s school activity
- Family emergency
- Unavoidable conflict such as auto accident, court appearance, etc.
- Unavailability of child care
- Unavailability of transportation
- Domestic violence
- Holiday observed by provider or JFES participant but not one of the list of 10 approved holidays

III. Work-Eligible Individual

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. The state should also describe its procedures for identifying a parent caring for a disabled family member. The procedures should define the terms "disabled," "family member" and "attending school full-time". 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. It should also include a description of the procedures for determining when the family member is no longer disabled and is then work-eligible.

State/Federal Definition: Work-eligible individual means an adult (or minor child head-of-household) receiving assistance under TANF or a Separate State Program or a non-recipient parent living with a child receiving such assistance unless the parent is:

- A minor parent and not the head-of-household.
- A non-citizen who is ineligible to receive assistance due to his or her immigration status; or
- At state option on a case-by-case basis, a recipient of Supplemental Security Income (SSI) benefits

The term also excludes:

- A parent providing care for a disabled family member living in the home provided that there is medical documentation to support the need for the parent to remain in the home to care for the disabled family member;
- At state option on a case-by-case basis, a parent who is a recipient of Social Security Disability Insurance (SSDI) benefits; and

At time of application for TANF cash assistance clients are assessed to determine whether or not they are work-eligible individuals. All work-eligible individuals are required to participate in the JFES program except for those exempted under state rules. Upon completion of the assessment, the DSS eligibility worker enters codes into the DSS business system to indicate if the applicant is mandatory or exempt from participation in JFES and, if exempt, the reason for the exemption.

Coding also exists in DSS business system that identifies parents who are excluded from the definition of work-eligible individual. They are:

- minor parents who are not the head-of-household;
- a non-recipient parent who is ineligible to receive assistance due to his or her immigration status;
- recipients of Supplemental Security Income (SSI) benefits; and
- and recipients of Social Security Disability Insurance (SSDI) Benefits

Work-Eligible Individual (Continued)

Coding exists to include as work-eligible individuals, non-recipient parents receiving SSI, with a recipient child, if their total monthly hours of employment are greater than or equal to hours that meet the work participation requirement. Coding also exists to include as work-eligible individuals, parents receiving SSDI, if their total monthly hours of employment are greater than or equal to hours that meet the work participation requirement.

The Numident process with the Social Security Administration verifies that DSS has the correct date of birth to identify minors as such. The SAVE system is used to verify a client's immigration status and the SDX system issued to verify the client's receipt of SSI, and the BENDEX or SCLQ system to verify the client's receipt of SSDI.

Parents caring for a disabled family member are exempt from participating in JFES based on state regulation and are also exempt in the definition of work-eligible individual. These parents are currently identified by their exemption status on the DSS business system.

The state uses the term "incapacitated" rather than "**disabled**." The disabled family member for whom the parent is caring must meet one of the three criteria in state regulation listed below. Incapacitated is defined in the state regulation as:

1. Receipt of Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI) benefits based on disability or blindness or
2. An adult with a physical or mental illness of such debilitating nature that it eliminates the person's ability to engage in employment on a predictable basis with reasonable regularity. Such illness or impairment must be expected to last for a least thirty days or
3. A child with a physical or mental illness or impairment of such debilitating nature that such child requires parental care at unpredictable times with reasonable regularity or on a substantially continuous basis.

The state regulation definition for incapacity includes a recipient of Social Security benefits based on disability or blindness.

Means of ensuring that the need for care in the home is supported by medical documentation and describe the nature of the medical documentation:

Such an individual must meet the state's "incapacitated" definition above and the department must also determine that the nature of the incapacity is such that care is required and provided at either unpredictable times or on a substantially continuous basis. Medical documentation must be submitted to support the need for such care. If an individual does not meet the criteria in #1, the department reviews the medical records of the individual to determine if the individual meets the definition for items #2 and #3.

Work-Eligible Individual (Continued)

Forms must be completed by the individual's medical provider to document incapacity. If the incapacitated individual requires the care of a family member, the medical provider must document the needs of the incapacitated individual that prevent the caregiver from working.

Once the family member is determined to be incapacitated and in need of care, to receive the exemption, the parent must document that no other household member can provide the care.

"Family member" is currently defined as a member of the household. The household member does not have to be a recipient of the TANF cash assistance award.

Procedures for determining when the family member is no longer disabled and is then work-eligible:

Individuals qualifying due to receipt of Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI) are considered incapacitated as long as they receive those benefits. Status of the SSI/SSDI benefit and status of the "incapacitated family member" is reviewed at every redetermination and application for extension to the state 21-month time limit (every 6 or 12 months after the first 21 months). Matches with the SDX and Bendex systems also alert eligibility staff to any changes in status.

The state regulation definition for incapacity also includes a recipient of Social Security benefits based on disability or blindness.

Incapacity determined by the department is reviewed at periods determined by the findings of the department. The department sets the review date based on the client's medical condition and his or her expected date of return to work or ability to participate in work activities.

Work-Eligible Individual (Continued)

1. *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.*

The work participation status of each individual is entered on the DSS business system as described in #1 above. A crosswalk exists between DSS business system and the automated data processing system to translate the state coding into the federal data reporting system. The crosswalk was developed as the state regulations permit more exemptions to participation than allowed by the federal rules. The crosswalk interprets the state codes and appropriately categorizes the client using the federal rules.

DSS business system coding allows DSS to identify and select appropriate adult and minor parent heads of household for inclusion in the TANF Data Report and the SSP-MOE Data Report.

Additional coding on the DSS business system and the crosswalk mentioned above ensures the proper identification of TANF families for inclusion or exclusion in the appropriate participation rate categories of All Families or Two-Parent. Effective October 1, 2007, cash assistance is provided to Two-Parent households in a solely state funded program. Two-Parent families are eligible for non-assistance programs such as employment services. DSS business system coding is maintained for All Families and Two-Parent cases.

In addition DSS has implemented a case review process to ensure that existing procedures for entering accurate data in the DSS business system are being followed.

DSS Quality Control Reviewers verify approximately 900 cases per quarter or 3,600 per year to check DSS business system coding against documentation maintained in the client case files, including data such as birth certificates. Inconsistencies or questions raised by the Quality Control Reviewers are directed to the DSS regional eligibility supervisors for each case in question, for additional verification, documentation and / or correction to the DSS business system file and client files. Changes based on DSS staff follow-up activities, with all edits sent to appropriate central office staff which makes any necessary changes to the federal reports.

Work-Eligible Individual (Continued)

- 2. 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.*

The DOL business system uses 4 digit codes entered by JFES staff to identify employment services activities in which the client is engaged. A crosswalk then buckets those codes into the federal categories. DSS continues to update the coding crosswalk, as needed, to align with the federal definitions of the work activities.

Connecticut currently offers vocational education that is generally ten months or less in duration and is allowed once for each JFES participant. JFES participants therefore, do not exceed the 12- month lifetime limit. JFES staff check the history of employment activities in the DOL business system before assigning new activities to ensure that JFES participants do not exceed the limit. Data for vocational education activities that exceed the 12 month limit would be rejected and not count as an approved activity.

As of September 30, 2007, a new Attendance Record function was implemented in the DOL business system. This new feature provides JFES staff with data fields to enter verified hours of participation in countable activities and excused absences as well as holidays. These verified hours entered into the Attendance Record are the data transmitted to DSS for actual hours of participation of the sample cases.

When transmitting the data into the automated data processing system via the crosswalk, edits may be encountered by DSS. When edits do occur they are researched to verify the accuracy of the information and make corrections as necessary in the state data. The crosswalk transmits the data in an automated fashion that eliminates human error.

IV. Internal Controls

Following are a description of internal controls that ensure consistent measurement of the work participation rates.

The State of Connecticut confirms that it will maintain all pertinent findings produced through its internal control processes and that these findings will be available for use by federal and state auditors in their review of the state's work participation verification system.

Procedures and/or internal controls for the Temporary Assistance for Needy Families Program, in accordance with the *Department of Health and Human Services, Administration for Children and Families, 45 CFR Parts 261, et al. Reauthorization of the Temporary Assistance for Needy Families Program* as follows:

Connecticut maintains procedures and internal controls for data verification procedures and DSS business system and client case file reviews. Data validation and case reviews are performed on each of the monthly sample cases.

Documentation:

1. Descriptions of the internal controls designed to ensure established work verification procedures are properly employed are as follows:

Controls include but are not limited to:

- **Supervisory guidance:** DSS and DOL Central Office Managers provide guidance on regulations, policies and procedures for work verification and implementation of the TANF program.

DOL and DSS schedule bi-monthly or quarterly meetings with the JFES program providers and JFES staff to provide guidance on regulations, policy and procedures. Agenda items for these meetings include guidance on the laws and regulations as well as instruction on new work verification policy and procedures. Bi-monthly or quarterly meetings provide additional guidance on verification policy and procedures. Policy directives concerning TANF/JFES policies or procedures are communicated to appropriate DSS, DOL, JFES staff and JFES contractors.

Internal Controls (Continued)

- ❑ **Staff training plans:** Meetings are scheduled, as needed, with DSS field and central office staff to provide training and support on the TANF and SNAP programs, any changes to policies, documentation requirements, or verification procedures and to learn from issues or concerns presented from the field. Additional communication and information is shared through the agency and state e-mail networks.

Communication has been provided to DSS central office and regional staff on critical data elements necessary for work participation rates and implementation of data validation through the case review system to ensure data is accurately captured in DSS business system. Training has been provided as needed.

DOL schedules training sessions on the implementation of procedures, for JFES staff.

- ❑ **Quality assurance processes:** Quality assurance processes are in place in the data management and reporting units through review of documentation, DSS business system, tracking records and federal reporting and system edits. Additional quality assurance is provided through program to program matching and review of JFES participant information and correcting and communicating errors, if found.
- ❑ Exchange of JFES participant and program data between DSS & DOL is automated and reduces the opportunity for human error. Transferring records and information into federal reporting system is automated and maintains editing features to assure appropriateness of data, relationships and codes being transmitted. Sample listings are sent from DSS to DOL central office and JFES staff to review for accuracy.

If earning screens and other coding elements are corrected by DSS or JFES staff, corrections are made and revised reports on samples are sent to the FTDRS.

- ❑ The case reviews included in the monthly TANF sample for quarterly federal reporting is retrieved by the regional DSS staff and made available to the DSS Quality Control Reviewers (QCR).
- ❑ DSS Central Office staff provides the QCR staff with the all of the data elements required for review and verification, from the monthly TANF caseload sample. This information is presented on forms with data regarding the individuals and household information for each Assistance Unit.

Internal Controls (Continued)

The DSS QCR staff review this information against the information and documentation found in the case files and on DSS business system.

- If errors are found, they are marked on the form and sent to central office for input of data revisions into the FTDRS federal reporting system. These errors are also corrected in the DSS business system in the field by DSS QCR staff and/or DSS field staff. A separate Case Review System (CRS) is used to track errors that require attention by eligibility staff. Once errors have been corrected and updated information noted, a report is sent to DSS central office for input of data revisions into the FTDRS federal reporting system.
- 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.
- **Monitoring procedures to ensure adherence to procedures by staff, providers and contractors.**

DOL conducts annual contract compliance monitoring and quality performance appraisals of JFES program providers. Monitoring and performance appraisal findings and recommendations are issued in formal reports to contractors who in turn implement corrective actions. Additionally, each JFES program provider conducts annual contract compliance monitoring of each of its subcontractors as required by the WIOA.

Training for regional staff on critical data elements necessary for work participation rates and implementation of case review system to ensure data is accurately captured in EMS/Impact. Feedback will be provided to staff who will take corrective actions on identified data errors. The review process will include a more intensive case review and validation of sample sets of TANF client case files to assure accuracy and completeness of information reported through the DSS business system and TANF reports.

Exception reports have been developed for wage data and hours which identify outliers if wages divided by hours are less than \$5.00 per hour or greater than \$15.00 per hour. These cases are then assigned to, reviewed and, if necessary corrected by DSS staff.

Reports have been developed to identify JFES participants with no hours in work activities documented in the DOL business system and/or where referrals have not been made by DSS staff to the JFES staff. These reports are distributed to DSS field staff for corrective action.

DSS field staff receives error reports through on-line alerts on Social Security numbers and birth dates of children that do not match those in the federal Social Security system (Numident). This allows staff to ensure that if a child's date of birth is incorrect that a correct date is determined and verified to validate that parents work hours are consistent with requirements for a child under the age of one year or under 6 years (20 hour work requirement).

2. Description of internal controls for:

- **Data errors:** In Connecticut, the process for reporting into the Federal TANF Data Reporting System (FTDRS) is automated and the data fields are populated directly from the DSS business system. This reduces the opportunity for human error. The FTDRS editing features provide consistency to the data that is accepted or rejected. If data is rejected it is then manually reviewed, updated and revised for the federal report(s). Data, relationships and codes being transmitted are input and corrected as necessary from DSS field staff. Inconsistencies, if found, are to be noted and reviewed by DSS field and central office staff. Utilization by DSS and DOL of the same definitions for related activities ensures a reduction in errors when matching against the same processes and definitions in the federal system. Sample listings are sent from DSS to DOL. JFES staff reviews these reports for accuracy.

In an effort to maintain overall quality data in the DOL business system, DOL periodically produces reports of JFES program data entered into DOL business system by JFES staff. These reports, which are sorted by JFES staff, contain lists of cases with apparent errors in entered data. These lists are distributed to program provider staff to distribute, research and correct, if necessary. Additionally, separate bi-monthly reports on the status of job search activities provided by JFES staff are issued to the JFES staff.

As mentioned above, the DSS field staff receives error reports on social security numbers and birth dates of children that do not match those in the federal Social Security system (Numident). This allows DSS staff to ensure that if a child's date of birth is incorrect that a correct date is determined and verified to validate that parents work hours are consistent with requirements for a child under the age of one year or under 6 years.

Case review and validation of samples sets of JFES recipient files will be performed as detailed earlier, to assure accuracy and completeness of information. Data inconsistencies will be documented and reported to DSS field managers and to DSS central office staff. Program guidance may be modified, if findings from assessment of work participation data determine that changes to operation polices and procedures are necessary.

- **Transcription and coding errors:** Internal edits for transcription and coding errors are performed electronically and reports and omissions are manually reviewed and corrected on a case by case basis and if rejected by federal reporting system editor. Data verifications are performed between DOL and DSS data. Coding and activity types are electronically cross-walked in an automated system, between the interrelated state and federal systems. This eliminates the opportunity for human error in reporting and documentation. The data fields in the DSS and DOL business systems are matched and coded to the FTDRS field names. Any revisions or changes to data are submitted in revised reports.

Electronic reporting allows for greater accuracy for comparisons made between other reporting periods, as the data in like reports is based on the same elements in the system.

- **Data omissions:** Internal edits are performed electronically and are manually reviewed and corrected on a case by case basis for data omissions, the federal reporting system editor rejects if parameters are not met. Exclusions are identified through DSS and DOL business system updates. Tables are created to identify program specific information and analysis. (Example: Vocational Education limits)

In an effort to maintain overall quality data in DOL business system, DOL periodically produces reports of JFES program data that was entered into DOL business system by JFES staff. These reports, which are sorted by JFES staff, contain lists of cases where it appears that data has been omitted. These lists are distributed to program provider staff to distribute, research and correct, if necessary.

- ❑ **Computational errors:** Computational errors may be identified through system matching of DSS and DOL sample data. System edits flag files or blocks a field, if information is identified to be outside of the parameters set for the particular data field. For example, time limits are flagged and do not allow for more than “12” for a parent with a child under one year in age.

In an effort to maintain overall quality data in DOL business system, DOL periodically produces reports of JFES program data that was entered into DOL business system by JFES staff. These reports, which are sorted by JFES staff, contain lists of cases with apparent errors in the number of hours of participation. These lists are distributed to program provider staff to distribute, research and correct, if necessary.

- ❑ **Compilation errors.** The electronic reporting allows for greater accuracy for data compilation and tabulation. It reduces potential for errors with duplication of counting client and program data elements. Comparisons of data against other reporting provide the opportunity for identifying trends and outlying data elements. Sample listings are sent from DSS to DOL. JFES staff review for accuracy. DSS staff review and correct data elements rejected by the federal reporting system to provide additional validation and accuracy.

3. A. Description of the checks used to isolate electronic systems and programming errors.

All sample cases are reviewed by JFES staff for validity and accuracy. This review identifies errors and would therefore identify any system generated calculation errors or validate the calculation of total hours, etc. as correct. Any data edits that are not included in the system generated transfer are adjusted by transmittal or communication of the data edits from JFES/DOL to DSS central office staff and are included in the submission to ACF.

DSS business system data validity edits are programmed into the system and require valid date inputs, relationship codes, social security numbers, etc. Appropriate data inputs are required in screen edits and final system edits.

DSS provides DOL with an electronic file of the monthly sample cases. DOL creates a report which sorts the sample cases by JFES staff. This report is distributed to program providers to forward to JFES staff. JFES staff are given a two-week time frame to research the sample cases and ensure that the data entered is accurate. DSS case review will also occur on these client files and corrections or modifications made.

In an effort to maintain overall quality data in DOL business system, DOL periodically produces reports of JFES program data that was entered into DSS business system. These reports, which are sorted by JFES staff, contain lists of cases with apparent errors in entered data. These lists are distributed to program provider staff to research and correct, if necessary.

B. Description of the steps to ensure that all work participation report items are internally consistent.

The Connecticut work participation reporting system electronically connects and matches data from the DSS and DOL business systems. Data elements are defined and reviewed by both agencies to ensure consistency with departmental processes and ensure compliance and consistency with federal definitions and guidelines. The state systems are used by the respective agency field/contract staff to document and process information based on communication with clients.

Electronic reporting pulls information based on data elements such as: active, unduplicated assistance units, benefit months, benefit payment history, fund code, service begin date, issuance date, validity coding for issuance type, and one or two parent stratum. Each data element must meet the coded parameters such as: values equal to, less than, greater than, enrolled in, exempt, disregarded, etc. according to data type. Because the data is pulled from the DSS business system, it sorts through data fields to meet required parameters, and then translates to the appropriate federal code for the FTDRS. These reporting elements are reviewed each year and a sampling plan is revised and submitted to the regional ACF office, annually.

The TANF eligibility process includes verification procedures for factors, such as date of birth, relationship, and exclusion of persons caring for disabled family members. DSS staff review and receive documentation such as birth certificates or legal guardian documents to verify client relationships, dates of birth, etc. for identification and eligibility. Exemptions codes are set through the DSS business system based on parameters and compliance with federal and state regulations and guidelines.

All Two-Parent cases have been reviewed to verify their correct classification. This will also be reviewed on an ongoing basis as part of the case review process.

Connecticut does not provide assistance to non-custodial parents or consider them to be members of the assistance unit.

4. Description of sampling and estimation techniques for data validation.

DSS provides DOL with an electronic file of the monthly sample cases. DOL creates a report which sorts the whole sample by JFES staff. This report is distributed to program providers to forward to JFES staff. JFES staff are given a two-week time frame to research all of the sample cases and ensure that the data entered is accurate. The paper documentation of actual hours of participation in the sample activities is reviewed to ensure that the data entered is accurate. If paper documentation does not substantiate the data entered on DSS business system, the data on the system is changed to reflect the data on the paper documentation. Quality controls and data validation is conducted on the whole sample universe by JFES staff. JFES contractors oversee the case management review of the sample cases and, at minimum, randomly check a sample of cases every month for quality assurance. All of the sample data files that are submitted into the federal reporting system are reviewed and validated through this process. Earnings data is included in the DSS business system screens.

Connecticut does not use estimation techniques or further sampling of the data included and drawn from the data sampling process. It is based on the statistical and sampling procedures mandated by ACF. Each year the data reporting elements are reviewed and a sampling plan is revised and submitted to the regional ACF office to ensure compliance with federal program requirements and to affirm statistically acceptable levels of reliability and validity.

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. Data validation procedures identified below, ensure “complete and accurate” data reporting and eliminate inconsistencies between data elements.

- ❑ **Reporting Month:** Validation of payment to client in report month occurs during building of sample universe by DSS business system. Computer generated.
- ❑ **Stratum:** Validation procedures confirm accurate placement of data in correct stratum.
- ❑ **Case Number:** Computer assigned.
- ❑ **Disposition:** Sample files are reported if active with payment or if errors - no assistance for reporting period, are dropped from sample report.
- ❑ **Type of Family Work Participation:** Computer generated based on worker verified fields in DSS business system. Initial validation of all Two-Parent families to assure that these cases are coded correctly has been completed. Periodic and ongoing case review process has been implemented.
- ❑ **Amount of SNAP Assistance:** Computer generated based on worker verified fields in DSS business system. Amounts received automatically from the DSS business system.
- ❑ **Receives Subsidized Child Care:** Computer match of sample household with child care business system. Database and manual case by case review of sample. Edits are entered for revision to FTDRS report.
- ❑ **Amounts of TANF (& SSP-MOE) Assistance:** Computer generated based on worker verified fields in DSS business system. Amounts received automatically from the DSS business system.
- ❑ **Family Affiliation Code:** Computer generated based on worker verified fields in DSS business system. Subject to the case review process.
- ❑ **Non-custodial Parent Indicator:** Always no. Connecticut does not include non-custodial parents in TANF Assistance.
- ❑ **Date of Birth (Adult):** Computer generated based on worker verified fields in DSS business system. Numident match of Social Security Number and Date of Birth w/SSA. Subject to the case review process.

Verification of Other Data Used in Calculating the Work Participation Rates (Continued)

- ❑ **Relationship to Head of Household:** Computer generated based on worker verified fields in DSS business system. Universe report sent quarterly with total recipients per household. Subject to the case review process.
- ❑ **Parent with minor Child:** Computer generated based on worker verified fields in DSS business system. Subject to the case review process.
- ❑ **Work Eligible Individual Indicator:** Computer generated based on worker verified fields in DSS business system. Subject to the case review process.
- ❑ **Date of Birth (Child):** Computer generated based on worker verified fields in DSS business system. Numident match of Social Security Number and Date of Birth w/SSA. Subject to the case review process.

A description of the procedures to establish 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 are shown below and identify the data elements used in calculating the work participation rates; data validation procedures to ensure “complete and accurate” data reporting; and procedures to eliminate data inconsistencies between two or more data elements.

Case characteristics that relate to special rules and conditions of participation of TANF families with a work eligible individual are in the client/case files in the DSS business system.

- ❑ **Receipt of child care:** computer match of sample household with the child care business system.
- ❑ **Age of child:** the age of child is calculated from the child’s date of birth, which the computer generates based on worker verified field in DSS business system. Subject to the case review process.
- ❑ **Age of adult or teen parent:** the age of adult or teen parent is calculated from the date of birth, which the computer generates based on worker verified field in DSS business system. Subject to the case review process.
- ❑ **Number of months under a sanction:** based on computer generated sanction code in DSS business system. Subject to the case review process.
- ❑ **Adult or teen parent with satisfactory school attendance:** computer generated based on worker verified fields in DSS business system. Subject to the case review process.
- ❑ **Families with a disabled family member:** computer generated based on worker verified fields in EMS. Subject to the case review process.

Verification of Other Data Used in Calculating the Work Participation Rates (Continued)

Work Participation Status

1. Description of 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 custodial parent with a **child less than one year of age**:

When a sample case is disregarded for a child less than 1 year of age, the case is written to a table in a database. This table is checked prior to using this code during the process of updating the federal file with data from the DOL.

2. Description of 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**:


DSS business system assigns different codes for 1st sanction (3 months), and 2nd sanction (3 months, with penalty increase to 35%). Cases with a 1st sanction code are used for this category. Also, cases in a subsequent sanction that occurs more than twelve months after the first sanction are also identified by the case review process and coded in this category.

3. Description of 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**.
 - a. The system checks age of youngest child in household to assure that the child is under 6 years of age.
 - b. System looks for second parent and confirms none exist.
 - c. System totals hours of countable work activities and checks to see if equal to or exceeds 20.

VI. Certification

CERTIFICATION

This is to certify that the State of Connecticut's TANF Work Verification Plan dated September 29, 2017 includes all the information required by the Regulations at 45 CFR 261.62(b) and accurately reflects the provisions under which Connecticut will operate effective October 1, 2017.



Peter J. Palermno, Program Manager
Connecticut Department of Social Services
Eligibility Policy & Program Supports
Division

ATTACHMENT A

Connecticut's Eligible Training Providers List

**State of Connecticut
Department of Social Services
Temporary Assistance for Needy Families (TANF)
Work Verification Plan**

October 1, 2017

Please refer to this website for the updated version of Connecticut's Program Education and Training Provider List (ETPL) at <http://www1.ctdol.state.ct.us/etpl/index.asp>

