

## **Taco Tuesday with TANF**

07/21/2020

### **Topic: JOBS Attendance Documentation Requirements & Projection of Hours**

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<input checked="" type="checkbox"/> District 2	<input checked="" type="checkbox"/> District 8	<input checked="" type="checkbox"/> District 14
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**Q: Do we need to have verification for countable activities such as DA (drug and alcohol services) and MH (mental health). Can we waive the verification requirement as long as we are able to have a conversation with the participant, due to COVID-19?**

A: The DA and MH steps are both Countable Activities. Countable Activities require verification from a third party, including calling the provider yourself. Participant self-reporting does not meet the requirements for countable activities.

States have not been given any waivers for the JOBS program in response to COVID-19.

If the family coach is not able to verify, narrate the conversation with the participant and their progress. Enter actual hours as zero and code unexcused hours. If the activity is one which we cannot verify hours, consider a more appropriate plan.

**Q: Are we verifying individual job search by calling the business listed?**

A: No, calls to each employment contact listed on the job search log is not necessary. When signing as the third-party verifier, ensure the form is completed in its entirety and have a conversation with the participant regarding their activities for week.

**Q: Who signs as supervising the 475 job search form if we don't have a contractor to verify?**

A: For the JOBS classes facilitated by family coaches, the family coach would serve as that third-party verification source. When signing as the third-party verifier, ensure the form is completed in its entirety and have a conversation with the participant regarding their activities for week.

**Q: Do we still need to narrate the self-reported hours?**

A: Yes, for activities that allow for self-reporting the family coach must narrate the activities, goal progress and hours to support what is entered in the TRACS attendance page. Example: Participant attended their half hour doctor appointment today; they are feeling optimistic as the doctor stated they will be released for light duty activities within two weeks if current progress continues. Updated ME step with .5 hours this week based on phone call with participant.

**Q: OED is currently doing virtual workshops. How do we capture this?**

A: OED is capturing and tracking individuals that attend virtual workshops, similar to how they were tracking in person workshops. Their iMatchSkills account is updated with the workshops they attend. OED would be able to verify attendance, or the participant can provide a print out of the iMatchSkills verifying they attended.

**Q: When would the supervised homework be used?**

A: 1 homework hour is allowed for each in-class hour, if the homework hours exceed the in-class hours, we need verification of supervised hours. Example: 15 hours of in-class hours equals 15 hours of allowable homework time.

**Q: Any suggestions for capturing hours for online educational activities to comply with requirements?**

A: Currently, we still must verify and obtain contact info for the school official who is able to verify the hours. If the family coach is unable to obtain verification, progress can be narrated but the actual hours would be zero and then code unexcused hours in the TRACS attendance page. It may not be the right activity for the TRACS PDP if the family coach is unable to verify as outlined in the JAG.

**Q: If we are not getting verified attendance, can we still provide support service payments?**

A: Yes, but it depends on the type of ongoing support services. The childcare billing form (JCCB) will not be sent once the attendance is at 5 weeks of zero. If childcare is provided, attendance must be verified and updated in TRACS.

The family coach needs to do their due diligence in attempting to verify attendance, such as offering the participant a release of information so the family coach can reach out directly to the service provider. There must be a narrative that identifies why we are issuing support services with no ongoing attendance documentation.

When no attendance is submitted, or reported, this is an indication for the family coach to check in with the participant regarding their PDP. Perhaps the PDP is no longer relevant or appropriately reflecting the goals of the participant. Or it may be that the participant needs some support in getting their attendance hours verified, and the family coach can explore getting a signed ROI in order to reach out to the provider directly to verify attendance.

**Q: When a customer attends virtual NA meetings, what verification can that customer provide?**

A: Documentation requirements are the same regardless of whether the meeting is in person or virtual. We could accept email verification from the leader of the meeting. This would replace the in-person documentation that you received prior to COVID-19.

If the participant is unable to obtain verification or does not wish to ask the NA leader for verification, offer to revise the PDP and focus on another goal. AA and NA meetings are often secondary lifelong activities and do not need to be included in the PDP if the participant wishes to focus on another short-term goal.

**Q: If someone is doing MH every other week, do we excuse every other week?**

A: Every other week would be unexcused, the week off does not meet the excused hours guidelines. See page 49 of the JAG.

**Q: If hours are not excused, do we have to narrate in TRACS?**

A: For audit purposes, it is not required to narrate when family coaches code unexcused hours. If the department is unable to code actual hours based on lack of documentation, for engagement purposes there needs to be a narration of the conversation with the participant and their progress.

**Q: Are we still using the excused hours mainly when looking at meeting federal participation? Are there still only 16 days excused? Would even 1 hour still equal 1 day?**

A: No, all hours that meet the excused criteria and have a corresponding narrative can be coded as excused. Federally, excused hours cannot exceed 80 hours per year. However, in alignment with the engagement model, we would code what reflects the family's situation. The system will stop reporting excused hours once it has reached 80 hours, but hours can still be coded in the TRACS.

*\*\* if the actual hours are consistently lower than the original agreed upon plan hours, revisit the plan with the family to ensure it is reflective of current goals and activities.*

**Q: If they are out for break from a school activity, do we create a new step during the break and then back to school when it resumes? Would we consider the break time unexcused, but narrate no attendance due to break in class?**

A: Rather than coding unexcused hours for multiple weeks, have a conversation with the participant to collaboratively create a new plan reflective of the participants goals and activities during school breaks. Once school has resumed the plan can be adjusted again to include the educational activity.

**Q: Is there a possibility of the contractors getting access to scan documents into EDMS?**

A: No, EDMS is an internal system that holds personal identifiable information on the families we serve, contractors may not access EDMS. If local areas are wanting to scan documents received by JOBS Contractors into EDMS, a local process will need to be developed to gather the documentation from the Contractors and have the documents scanned into EDMS by DHS staff.

**Q: Who is responsible for entering the 2 weeks for PL?**

A: This varies by district and what is outlined in contract agreements. In some areas, the department is responsible and some it is an expectation of the contractor. Check with local leadership to determine the process for your area.

**Q: Can we take a customer's statement if the actual business expenses is over 50% when calculating WO hours?**

A: When calculating WO hours based on self-employment, the automatic 50% deduction is not used. The family coach takes the gross wages minus business expenses and then divide by

federal minimum wage. WO is a countable activity, meaning the participant must provide documentation of income. Statement of expenses can be accepted if reasonable. If no expenses are reported, the family coach would divide the gross wages by federal minimum wage to determine hours. Narrate how the hours were determined to support hours entered in the TRACS attendance page.

**Q: Currently, we create an ME step when requesting medical documentation. Once we have received the letter from the doctor, we create an RA step and close the ME step. Doctor indicated to exempt the customer from the JOBS program for one year due to medical condition. Is this correct?**

A: A ME step could be appropriate when collecting medical documentation. ME steps are used when participants are working with a medical provider to determine ongoing medical issues. ME step is a non-countable activity and allows for self-reporting by the participant. While a participant is in a ME step the family coach would maintain ongoing contact with the participant and get updates as to their progress and develop next steps towards meeting their long-term goals.

It is possible that after the participant receives a diagnosis and treatment plan that includes ongoing medical care that the ME step would change to an RA step but that is not always the case. In order to code a RA step, the participant's goals should include ongoing therapeutic and medically necessary activities directly provided by a licensed professional. Examples could include physical therapy, dialysis, pain management activities, ongoing acupuncture appointments, chemotherapy, etc. These appointments would be regular weekly or biweekly appointments. RA step is a Core Countable activity and requires 3<sup>rd</sup> party verification of treatment activity. We cannot add self-reported attendance into TRACS.

If the participant's ongoing medical appointments are sporadic, they are still in the diagnosis stage, or if they are just meeting with their primary care doctor an RA step would not be appropriate.

**Q: Do we have to call customer weekly or monthly to check in in order to enter RA attendance? If customer does not answer the phone, can we still enter an hour per week? or do we enter 0 hour for each week of that month?**

A: The RA step is a countable activity which requires verification and cannot be self-reported. For all activities, if we are unable to contact the customer or receive attendance verification, we cannot enter any attendance as actual in TRACS. If due to COVID the participant is unable to obtain the RA attendance, then we would narrate that they reported attending but were unable to verify. Attendance would be entered in TRACS as zero actual and then code unexcused hours.

**Q: With the CI step, if customer does not answer the phone, can we still enter an hour per week? or do we enter 0 hour for each week of that month?**

A: CI step is a non-countable activity, meaning we can accept participants statement of self-reported hours. We must have contact with them in order to do so. Contact can be a verbal conversation over the phone, text, skype, email or written. If you are unable to contact the participant and have a conversation about current activities, progress and future goals, then we would enter zero actual hours and code unexcused attendance into TRACS.