



State of Oregon
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Office of Self-Sufficiency

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

Effective Date: January 1, 2021

Safety, health and independence for all Oregonians.

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State of Oregon
Temporary Assistance for Needy Families
Work Verification Plan
January 1, 2021

I. Countable Work Activities

In 2004, the State of Oregon developed a "JOBS Activity Guidelines" document to be used by TANF JOBS Program staff. These guidelines are used by field staff to:

- a. describe the purpose of each JOBS Program activity;
- b. provide consistent definitions of activities, including appropriate and inappropriate assignments for each activity; and
- c. outline acceptable documentation of attendance for participation.
- d. find the definition of allowable activities and mandatory participants;
- e. Reference acceptable attendance documentation; and
- f. definitions and clarification of important terms.

The JOBS Activity Guidelines were initially provided in 2006 to State field managers, Family Coaches, contractors, and other providers of JOBS services in Oregon. The guidelines serve as the State's expectations for field operation and staff. The work of staff will continue to be reviewed according to the instructions provided in the guidelines. The JOBS Activity Guidelines are amended as changes are made to the program and in alignment with the Work Verification Plan.

General documentation policy

Oregon uses the Client Maintenance (CM) system and the Transition Referral and Client Self-Sufficiency (TRACS) system as a means for capturing, monitoring, and reporting of JOBS activities and attendance.

The guidelines for attendance documentation are:

- a. All attendance documentation must be maintained in the participant's case file or narrated in the TRACS case file.
- b. Attendance will be documented with third party reporting, such as from contractors, employers, service providers, or others who can attest to the participant's attendance.
- c. Attendance documents should include:
 - I. the participant's name;
 - II. actual hours participated;
 - III. name of the employer and/or training provider; and
 - IV. name and phone number of the person verifying hours.

- d. Attendance recorded in TRACS must be actual hours or projected actual hours of participation, not scheduled hours or based on exceptional reporting (assuming participation is occurring unless notified otherwise).
- e. Attendance recorded in TRACS must be documented based on the items listed above.
- f. Participation in activities must be supervised and documented.

A case plan, also known as a personal development plan (PDP) is completed on all JOBS program participants. This plan is a written outline, developed by the participant and the ODHS Family Coach, with input from partners as appropriate. The case plan lists activities and goals for the participant, including start and end dates, scheduled activity hours and participant and ODHS responsibilities. A copy is provided to the participant and a copy is maintained by ODHS.

Unsubsidized Employment Including Self-Employment

Describe the Services or programs Oregon includes under Unsubsidized Employment

WO – Unsubsidized Employment: This activity is for TANF participants working in unsubsidized employment. The unsubsidized employment program includes self-employment which is defined as an individual who is drawing an income for a trade or business and works for himself/herself instead of an employee or another person or organization.

Oregon does not include unpaid apprenticeships, internships, or other similar unpaid work activities as unsubsidized employment.

MI - Micro-Enterprise: Was an opportunity for the participant with assistance and support to focus on a reasonable small business opportunity through self-employment. This activity is obsolete as of 01/01/2021, as it will be removed from Oregon administrative rule, and can be better supported under other activities.

JPI – Job Participation Incentive: JPI provides a monthly food benefit to participants working in unsubsidized employment who are not receiving TANF cash benefits. Participants must meet modified TANF eligibility requirements. These include a minor child in the household, Oregon residency, a family income that is below 185 percent of the Federal Poverty Level and meet federal participation requirements.

EP – Employment Payments: EP provides a monthly benefit to participants who work in unsubsidized employment and have gone over-income for the TANF cash grant. Participants must meet TANF modified eligibility requirements, these include a minor child in the household, Oregon residency and a family income that is below 300 percent of the Federal Poverty Level.

Describe how the State determines the number of countable hours of participation for each State activity reported under Unsubsidized Employment.

Countable hours of participation for unsubsidized employment activities are paid work time.

Describe how the State verifies the actual hours of participation for Unsubsidized Employment. Include the procedures for obtaining and maintaining documentation used to verify hours of participation.

Unsubsidized employment attendance may be documented by projecting actual hours for up to six months or reporting current actual hours. Current or projected hours will be documented with one of the following items:

- a. pay stubs,
- b. timecards,
- c. sign-in/sign-out sheets, rosters, attendance records, or other employer produced documents with recorded hours of work, or
- d. properly verified phone conversations with an employer.

For self-employment, describe how the State counts and verifies the hours of participation. A State may not count more hours toward participation for a self-employed individual than the individual's self-employment income (gross income less business expenses) divided by the Federal minimum wage. The State may also describe an alternative methodology to count and verify hours a client is engaged in self-employment

Self-employment hours are determined by calculating: Gross income less allowed business expenses divided by the Federal or Oregon minimum wage for WO and JPI participants. Income and expenses as defined in Oregon Administrative Rule (OAR) [461-145-0920](#), must be documented and retained in the participant's file. Self-employed participants not in the microenterprise activity will not have business deductions excluded per OAR [461-145-0930](#).

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

When the participant's work hours are stable, attendance is recorded for paid employment using projected actual hours. Projected actual hours are determined by the participant's average number of hours worked per week based on at least two consecutive weeks. This is the JOBS paid work attendance entered for the next six months.

Projected actual hours cannot be used if the participant expects to work less hours than the verified hours worked during at least two consecutive weeks.

When changes to a work situation occur, new projection of attendance for the remainder of the six months will be completed and documented when applicable.

At the end of each six-month period, ODHS will re-verify the work hours.

Subsidized Private Sector and Subsidized Public Sector Employment

As both activities operate the same, subsidized private and public sector employment are combined. Oregon maintains a tracking system that enables us to separate the two types of employment participation hours.

Describe the services or programs the State includes under Subsidized Private and Public-Sector Employment.

Oregon operates a subsidized private and public-sector employment program called JOBS Plus, pursuant to Oregon Revised Statutes (ORS) 411.877 to 411.896. Through JOBS Plus, participants are placed in subsidized employment. TANF and Supplemental Nutrition Assistance Program (SNAP) benefits are diverted. Net income for the participant must not be less than the combined income from TANF and SNAP. The intent of JOBS Plus is to enhance the employability of participants with limited skills. JOBS Plus provides an incentive to participants by increasing their skill level to help meet their short-term job goals. Participants are required to complete one day of job search each week after their fourth month of placement; the employer treats this as paid time.

JOBS Plus participants are:

- a. on the employer's payroll
- b. considered temporary employees
- c. entitled to the same employer benefits as other temporary employees.

The JOBS Plus program activity code for subsidized employment is: PL.

Describe how the State determines the number of countable hours of participation for each State activity reported under Subsidized Private and Public Sector Employment.

Countable work hours of participation for subsidized employment include all paid hours and paid job search hours.

Describe how the State verifies the actual hours of participation for Subsidized Private and Public Sector Employment. Include the procedures for obtaining and maintaining documentation used to verify hours of participation.

Subsidized employment attendance must be documented by projecting actual hours for six months or reporting current actual hours. Current actual hours or projected actual hours will be documented with one of the following items:

- a. pay stubs,
- b. timecards, or
- c. sign-in and sign-out sheets, rosters, attendance records, or other employer produced documents with recorded hours of work.

JOBS Plus employers submit a monthly Wage Reimbursement Billing form (WRB) to the Department's Direct Pay Unit (DPU). The employer certifies the number of hours paid for the reimbursement period. DPU staff can enter paid work hours in the JOBS tracking and data system (TRACS).

Documentation for Subsidized Private and Public Sector Employment. If the State intends to project forward hours of participation based on current, documented, actual hours, explain how it will make this projection.

The policy for projecting actual hours for subsidized paid employment is the same as the policy for unsubsidized employment described in Section I – [Projecting hours for Unsubsidized Employment](#).

Work Experience

Describe the services or programs the State includes under Work Experience.

WE - work experience: unpaid work to develop work habits, skills, training, and knowledge to obtain permanent employment. Work is conducted at a work site and is available through private for-profit, non-profit or public sector.

SW - supported work: activity for participants who need more intensive support, skills training, and job-related intervention and counseling at an unpaid work site or work simulation activity.

The working conditions for participants must adhere to all applicable state and federal health and safety standards and not require activities not considered usual and customary in the occupation for which the participant is being trained.

Describe how the State determines the number of countable hours or participation for each State activity reported under Work Experience.

Countable hours of participation for work experience are hours at work, holidays and excused absences. Excused absences and holidays are defined in [Section II - Hours Engaged in Work](#).

The Fair Labor Standards Act (FLSA) applies to employers with individuals working in unpaid JOBS work activities WE and SW.

Describe how the State verifies the actual hours of participation for Work Experience. Include the procedures for obtaining and maintaining documentation used to verify hours of participation.

Work experience attendance hours must be documented no less than monthly using one of the following:

- a. timecards, sign-in/sign-out sheets,
- b. rosters, other employer documents with recorded hours of work,
- c. contractor reporting, or
- d. attendance reports from the worksite.

Describe the methods of daily supervision for each unpaid work activity.

Daily supervision is required of all unpaid work activities which includes daily assignment of tasks or duties, oversight of the individuals participation and access to a Family Coach or a partner staff member.

Partners include contractors, paid and unpaid service providers, paid and unpaid for-profit businesses and non-profit agencies, charity organizations, volunteer organizations, governmental and quasi-governmental agencies.

On-the-Job Training

Describe the services or programs the State includes under On-the-Job Training.

JT - On-the-Job Training: Activity for paid employees who are in non-JOBS Plus subsidized employment, for students who are in an unpaid internship, or in a federal or state-funded work study position.

The employer trains the participant and is reimbursed by another entity or program, as part of training. Workforce partners, such as WIOA providers enter direct JT contracts with employers.

Describe how the State determines the number of countable hours of participation for each State activity reported under On-the-Job Training.

Countable hours of participation for JT are paid work and training time.

Describe how the State verifies the accuracy of the hours of participation for each State activity reported under On-the-Job Training. Include in this description the procedures for obtaining and maintaining the documentation used to verify hours of participation.

On-the-Job Training attendance must be documented by projecting actual hours for up to six months or reporting current actual hours, with one of the following:

- a. pay stubs, timecards, or
- b. sign-in/sign-out sheets, rosters, attendance records, or
- c. other employer produced documents with recorded hours of work and/or training.
- d. Employer verbal verification that includes name and phone number of the person verifying the information and the work week dates and hours verified.

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

Contracted providers offering On-The-Job Training through the Youth Employment Program, develop a training plan with the youth participating in the program. The provider will assess skills, barriers, previous experience and career path interests with the youth to build their training plan. The provider offers initial job readiness services prior to the subsidized employment placement and during the placement the provider continues to offer support to the employer and youth.

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

The policy for projecting actual hours for JT is detailed in [Section I - Documentation for Unsubsidized Employment](#) (5).

Job Search and Job Readiness Assistance

Describe the services or programs the State includes under Job Search and Job Readiness Assistance.

DA - drug and alcohol treatment: activities to help participants identify and overcome addictions and substance use disorders that prevent or limit employability and self-sufficiency. Must be determined to be necessary and certified by a qualified professional. Activities include:

- a. substance abuse screening and/or evaluation
- b. outpatient or residential drug and/or alcohol treatment
- c. attending support or community groups such as (AA, NA, Al-Anon)
- d. medication management related to treatment

JO - job search: Activities to help participants prepare, locate and retain future employment:

- a. develop resumes
- b. develop interviewing skills
- c. informational interviews
- d. contact and interview with employers
- e. complete and submit employment applications
- f. gather information about the labor market
- g. job search preparation classes

- h. travel time between employer contacts
- i. time spent with placement agencies such as the Employment Department, staffing companies, or employment specialists.
- j. working with a contractor to prepare for a JOBS Plus or Work Experience placement
- k. complete the process to be certified as a home care worker through the ODHS Aging and People with Disabilities
- l. work with a contractor to prepare for enrollment in a Vocational Training or Self-Initiated Training component.

LS - life skills: activities and classes that offer development of skills that prepare participants to be successful in the workplace and daily living:

- a. development of workplace skills, habits, and behavior
- b. daily living skills and decision making
- c. employment retention skills
- d. budgeting
- e. parenting and relationship skills
- f. self-esteem building

MH - mental health treatment: activities to reduce barriers to employment caused by mental health issues. Must be determined to be necessary and certified by a qualified professional:

- a. individual and group counseling sessions and treatment
- b. medication management related to mental health services
- c. support groups
- d. mental health and psychological evaluation
- e. mental health screenings and assessments by qualified mental health and medical providers

RA - rehabilitation activities: activities to reduce barriers caused by physical, medical and/or other disabilities. Must be determined to be necessary and certified by a qualified medical professional.

- a. pain management related to medical services
- b. medication management related to medical services
- c. support groups
- d. therapeutic activities including physical, speech, occupational and exercises assigned by a provider

Describe how the State determines the number of countable hours of participation for each State activity reported under Job Search and Job Readiness Assistance.

Countable hours of participation for Oregon's job search and job readiness assistance activities are based on actual hours.

Describe how the State verifies the actual hours of participation for Job Search and Job Readiness Assistance. Include the procedures for obtaining and maintaining documentation used to verify hours of participation.

Job search and job readiness assistance attendance must be documented no less than monthly with one of the following:

- a. contractor reporting;
- b. state approved job search logs;
- c. drug and alcohol services, mental health services and rehabilitation activities attendance forms;
- d. treatment provider reporting;
- e. support group reporting;
- f. clinical or medical staff reporting.
- g. All attendance documentation in TRACS case file.
- h. Other than job search, attendance will be documented with third party reporting, such as from contractors, employers, service providers or others who can attest to the participant's attendance.
- i. Job search contacts are documented by the participant using a state approved job search log (includes the ODHS Form 475) which will contain the following: Employer's name, address and phone number; contact person; date of contact, type of contact; contact results, and time spent on the job search task. The log will be signed by the participant and submitted to ODHS or appropriate Contractor for verification and approval.

Describe the methods of daily supervision for each unpaid work activity.

Oregon will require daily supervision of all job search and job readiness activities. This policy will be explained to all participants, contractor staff and ODHS Family Coaches. Service providers and contractor staff must agree to provide daily supervision to all TANF participants.

Although supervision may not involve daily contact, daily supervision does include the daily assignment of tasks or duties, oversight of the participant's participation, and access to a Family Coach or a partner staff member. Assignment of daily tasks or duties will be provided by the work site supervisor, partner staff or in writing by the Family Coach via a Personal Development Plan.

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

The need for treatment is determined based on a number of factors, including:

1. Participants can self-disclosure barriers and other employment-related information on the Family Assessment tool.
2. Results of alcohol and drug (A&D) or mental health screenings followed by subsequent referral, as needed, to a treatment provider for A&D or mental health assessment. Based on the assessment, the treatment provider then makes a determination of the participant's need for treatment, including diagnosis and prognosis.
3. Results of learning needs screening followed by subsequent referral to the service provider for learning needs assessment as indicated.
4. Information provided by a physician regarding a participant's abilities and limitations and the effect of a participant's limitations on their ability to work or do work-related activities.
5. Observations by Self-Sufficiency staff and non-clinical contracted staff through the course of the case.
6. Observations by contracted staff who are A&D or mental health specialists or nurses through the life of the case.
7. Joint staffing's (self-sufficiency staff, and if appropriate, A&D and mental health specialists, nurses and other community partners) held to discuss information gathered through the means listed above as well as any other available information related to a participant and their employability.

Certification requirements for A&D or mental health specialists are set by the agency that employs the specialist. However, A&D and mental health specialists who provide and interpret A&D and mental health screenings for participants must have the same credentials as A&D and mental health professionals who work at a county treatment provider, providing treatment and therapy for the community.

Likewise, nurses providing services to Self-Sufficiency participants must meet the same certification requirements as nurses who provide services at a clinic or a hospital. Learning Disability assessments are provided through certified professionals in the local communities as available.

Describe how the State ensures that no more than six total weeks (four consecutive weeks) of job search and job readiness assistance are reported in a fiscal year (or a total of 12-weeks in States that meet the definition of a “needy State” for the Contingency Fund).

Limit of hours within the preceding 12-month period:

For all participants on the case, lookup the corresponding record (or create a new record) on the Hours of Attendance table and review the previous 51 weeks to obtain a total count of the number of hours reported for the specific Job Search and Job Readiness codes.

Based on Oregon’s Needy State status the parameter on the extract file will be updated to reflect either an hourly conversion from a 6-week limit or a 12-week (needy state) limit within the preceding 12-month period. Department staff continue to monitor the states needy state status, and report accordingly.

The output file created in this process is used in the TANF Reporting process, The participants Jobs Activity date range is checked to assure it falls within the specified week being accumulated. It should be noted that all cases and participants, regardless of TANF activity, are processed. This assures that as cases move in and out of TANF eligibility, we have captured accurate hours of attendance.

No More than Four Consecutive Weeks:

Oregon's process goes through the Accumulated Consecutive Weeks of Attendance file for each TANF participant. Only weeks with more than 20 hours of attendance are used, those with less are bypassed. Beginning with the first week of October for a processing year, the next sequential week of attendance is retrieved. Next the day range of the week is checked to determine if there are more than seven days between weeks. When only seven days are calculated between the first week start day and the subsequent week start day and the weeks counter has not reached five weeks, the weeks counter is incremented by one. During this process, if the weeks counter reaches five, an over week limit flag is set. This continues until all weeks up to the end of the processing time period has been checked. If reported hours in job search and job readiness

activities do not support the recipient meeting participation, Oregon will not seek credit for this participation.

Community Service Programs

Describe the services or programs the State includes under Community Service Programs.

CP - community service program: unpaid work performed for the direct benefit of the community in such fields as health, social service, environmental protection, education, recreation, public facilities, public safety and child care. Activities include but are not limited to: volunteering their child's school, beach or highway cleanup, youth programs, senior or elderly programs, religious organizations, etc.

- a. volunteering at their child's school, beach or highway cleanup, youth programs, senior or elderly programs, religious organizations, etc.
- b. volunteering for a public agency or nonprofit organization
- c. orientation and ongoing volunteer hours

Describe how the State determines the number of countable hours of participation for each State activity reported under Community Service Programs.

Countable hours of participation for Community Service Programs are work time, embedded activities, training courses related to the community service program job, holidays, and excused absences. Excused absences and holidays are defined in Section II - Hours Engaged in Work.

Describe how the State verifies the actual hours of participation for Community Service Programs. Include the procedures for obtaining and maintaining documentation used to verify hours of participation.

Community Service Program attendance must be documented no less than monthly. Hours will be documented with one of the following items:

- a. timecards, sign-in/sign-out sheets,
- b. rosters, other employer documents with recorded hours of work,
- c. contractor reporting,
- d. Attendance reports from the worksite.

Describe how the types of Community Service positions that create an employer/employee relationship and are subject to the FLSA minimum wage requirements will be determined.

The Fair Labor Standards Act (FLSA) applies to employers and individuals working in unpaid JOBS work activities (work experience, sheltered work, and community service). FLSA requires that individuals engaged in these activities, in effect, cannot "work off" their TANF and SNAP benefits at an hourly rate of less than the higher of the Federal or State minimum wage.

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

Any recipient who self-initiates a community service program position will be required to submit the position to the State of Oregon for approval. The Department of Human Services or its service contractor will verify that the position is unpaid work that involves structured activities that improves the employability of the participant, work is performed for the direct benefit of the community in such fields as health, social service, environmental protection, education, urban and rural redevelopment, welfare, recreation, public facilities, public safety and child care. As with other work programs, community service programs provide a work record, job reference, and the development of good work habits that improves the recipient's employability.

Describe the methods of daily supervision for each Community Service Program activity.

Oregon will require daily supervision of all Community Service Program activities. Although supervision may not involve daily contact, daily supervision does include the daily assignment of tasks or duties, oversight of the individual's participation, and access to a Family Coach or a partner staff member. Assignment of daily tasks or duties will be provided by the work site supervisor, partner staff, or in writing by the Family Coach via a Personal Development Plan.

Vocational Education Training

Describe the services or programs the State includes under Vocational Educational Training.

VT – vocational training: activity that provides participants with up to 18 months access to specific vocational educational training that will lead to a certificate, job offer, and/or career.

SI – self-initiated training: activity in which participants are enrolled in a two or four-year program, earning credit toward a college degree.

Vocational education must be provided by education or training organizations, such vocational technical schools, community colleges, colleges or universities, and proprietary schools.

Describe how the State determines the number of countable hours of participation for each State activity reported under Vocational Educational Training.

Countable attendance hours for vocational educational training are class time, lab work, field study, clinical time, internship, activities required by the educational provider to fulfill credit requirements, limited unsupervised study time, holidays, and excused absences. Attendance includes work focused general education and language instruction as part of vocational education training program. Countable homework time is limited to the amount required by the vocational educational program. Excused absences and holidays are determined using the method described in [Section II - Hours Engaged in Work](#).

In situations where the participant is engaged in distance educational or training activities, countable hours will be determined based on a fixed number of hours per credit as determined by the educational or training program. If a program determines that every credit hour equals two actual hours, the plan will reflect two countable hours.

Describe how the State verifies the actual hours of participation for Vocational Training. Include the procedures for obtaining and maintaining documentation used to verify hours of participation.

Vocational educational training attendance must be documented no less than monthly. Hours will be documented with one of the following items:

- a. school attendance records
- b. educational provider reporting
- c. state approved education attendance form

In situations where the participant is unable to obtain verification of hours from their educational or training program, the Family Coach may serve as the individual verifying hours and daily supervision only if the following are true:

- a. discussion of attendance between the family coach and participant is occurring on a minimum of once a month, and
- b. adequate evidence has been provided that the individual is making satisfactory progress

If the participant does not provide adequate evidence of making satisfactory progress, the department would require verification of hours from the educational or training program, and the Family Coach would no longer serve as the verification source.

Maintenance of documentation

Describe the methods of daily supervision for each Vocational Education Training activity.

Oregon will require daily supervision of all Vocational Education Training activities. Although supervision may not involve daily contact, daily supervision does include the daily assignment of tasks or duties, oversight of the individuals participation, and access to a Family Coach or a partner staff member. Assignment of daily tasks or duties will be provided by the educational institution staff, partner staff, or in writing by the Family Coach via a Personal Development Plan.

Describe how the State ensures participation in Vocational Education Training does not count beyond the statutory limitations limiting participation to 12 months lifetime per individual.

A counter in TRACS is used to accumulate all weeks of Vocational Education Training activities for each TANF participant. Once the statutory lifetime limit is reached for an individual, logic in the program bypasses the individual's Vocational Education Training participation and it is excluded from the report.

Explain how the State will ensure that basic and remedial education and English as a Second Language (ESL), if such activities are counted, are of limited duration and a necessary or regular part of the Vocational Educational Training.

The Family Coach or contractor staff will be responsible for determining that the participant's vocational educational training plan only includes adult basic

educational, acquisition of a high school diploma or GED, and ESL that is of a limited duration and is a necessary or regular part of the training as required by the educational provider. The educational provider must verify that any basic and remedial education and/or ESL are required pre-requisites for this participant to complete their vocational educational training.

Job Skills Training Directly Related to Employment

Describe the services or programs the State includes under Job Skills Training.

JS – job skills training: unpaid training required by an employer that is needed to gain the skills necessary to be hired, retained or advance in employment. Examples include technical trainings offered by local Workforce Innovation and Opportunity Act partners, and pre apprenticeship programs.

Describe how the State determines the number of countable hours of participation for each State activity reported under Job Skills Training.

Countable attendance hours for job skills training are class time, lab work, field study, clinical time, internship, activities required by the educational provider to fulfill credit requirements, limited unsupervised study time, holidays, and excused absences. Excused absences and holidays are determined using the method described in [Section II – Hours Engaged in Work](#).

Describe how the State verifies the actual hours of participation for Job Skills Training. Include the procedures for obtaining and maintaining documentation used to verify hours of participation.

Job skills training attendance must be documented no less than monthly. Hours will be documented with one of the following items:

- a. school attendance records
- b. educational provider reporting
- c. state approved education attendance form

Maintaining documentation

Describe the methods of daily supervision for unpaid work activities.

Oregon will require daily supervision of all Job Skills Training activities.

Although supervision may not involve daily contact, daily supervision does include the daily assignment of tasks or duties, oversight of the participant's participation, and access to a Family Coach or a partner staff member. Assignment of daily tasks or duties will be provided by the work site supervisor, partner staff, or in writing by the Family Coach via a Personal Development Plan.

Education Related to Employment

Describe the services or programs the State includes under Education Directly Related to Employment.

AB - adult basic education: activity that addresses basic literacy or math skills for adults 20 years of age and older without a high school diploma or GED. Activity needs to be related to an employment opportunity requiring a specific literacy or numeracy grade level. Activity not related to pursuing a high school diploma or GED (equivalent).

ES - English as a second language: activity for participants with whom English is not their first language to improve English proficiency.

Describe how the State determines the number of countable hours of participation for each State activity reported under Education Directly Related to Employment.

Countable attendance hours for education directly related to employment are class time and activities required by the educational provider to fulfill credit requirements, limited unsupervised study time, holidays, and excused absences. Countable homework time is limited to the amount required by the educational program. Attendance includes work focused general education and language instruction as part education directly related to employment program. Excused absences and holidays are determined using the method described in [Section II - Hours Engaged in Work.](#)

In situations where the participant is engaged in distance educational activities, countable hours will be determined based on a fixed number of hours per credit as determined by the educational program. If a program determines that every credit hour equals two actual hours, the plan will reflect two countable hours.

Describe how the State verifies the actual hours of participation for Education Directly related to Employment. Include the procedures for obtaining and maintaining documentation used to verify hours of participation.

Education directly related to employment attendance must be documented no less than monthly. Hours will be documented with one of the following items:

- a. school attendance records
- b. educational provider reporting
- c. state approved education attendance form

In situations where the participant is unable to obtain verification of hours from their educational program, the Family Coach may serve as the individual verifying hours and daily supervision only if the following are true;

- a. discussion of attendance between the family coach and participant is occurring on a minimum of once a month, and
- b. adequate evidence has been provided that the individual is making satisfactory progress

If the participant does not provide adequate evidence of making satisfactory progress, the department would require verification of hours from the educational program, and the Family Coach would no longer serve as the verification source.

Describe the methods of daily supervision for each activity under Education Directly Related to Employment.

Oregon will require daily supervision of all activities under Education Directly Related to Employment. Although supervision may not involve daily contact, daily supervision does include the daily assignment of tasks or duties, oversight of the individuals participation, and access to a Family Coach or a partner staff member. Assignment of daily tasks or duties will be provided by the educational institution staff, partner staff, or in writing by the Family Coach via a Personal Development Plan.

Secondary School or GED Attendance

Describe the services or programs the State includes under Satisfactory School Attendance.

HS – High School Diploma or GED: activity for any participant who is working toward a high school diploma or GED (equivalent).

Describe how the State determines the number of countable hours of participation for each State activity reported under Satisfactory School Attendance.

Countable attendance hours for satisfactory school attendance are class time, and activities required by the educational provider to fulfill credit requirements, limited unsupervised study time, holidays, and excused absences. Countable homework time is limited to the amount required by the school program. Attendance includes work focused general education and language instruction as part of satisfactory school attendance program. Excused absences and holidays are determined using the method described in [Section II - Hours Engaged in Work](#).

In situations where the participant is engaged in distance educational activities, countable hours will be determined based on a fixed number of hours per credit as determined by the educational program. If a program determines that every credit hour equals two actual hours, the plan will reflect two countable hours.

Describe how the State verifies the actual hours of participation for under Satisfactory School Attendance. Include the procedures for obtaining and maintaining documentation used to verify hours of participation.

Satisfactory school attendance must be documented no less than monthly. Hours will be documented with one of the following items:

- a. school attendance records
- b. educational provider reporting
- c. State approved education attendance form.

In situations where the participant is unable to obtain verification of hours from their educational program, the Family Coach may serve as the individual verifying hours and daily supervision only if the following are true;

- a. discussion of attendance between the family coach and participant is occurring on a minimum of once a month, and
- b. adequate evidence has been provided that the individual is making satisfactory progress

If the participant does not provide adequate evidence of making satisfactory progress, the department would require verification of hours from the educational program, and the Family Coach would no longer serve as the verification source.

Describe the methods of daily supervision for each activity under Satisfactory School Attendance.

Oregon will require daily supervision of all activities under Satisfactory School Attendance. Although supervision may not involve daily contact, daily supervision does include the daily assignment of tasks or duties, oversight of the individuals participation, and access to a Family Coach or a partner staff member. Assignment of daily tasks or duties will be provided by the educational institution staff, partner staff, or in writing by the Family Coach via a Personal Development Plan.

Describe the State's criteria for "good or satisfactory progress" and when and how it is documented.

Oregon defines "good or satisfactory progress" for students attending secondary school or a course of study leading to a certificate of general equivalency as a student receiving a passing grade and/or progressing toward completion at no less than the normal rate of a half-time student. Actual attendance in educational activities is documented in TRACS no less than monthly by the Family Coach. Countable homework time is limited to one hour for every class hour unless verification is provided that the school requires additional hours All time reporting must include a certification of daily supervision.

For the Federal Report only actual attendance hours are collected. Scheduled hours are not collected for this item.

Describe the services or programs the State includes under "Providing Child Care Services to an Individuals Who is Participating in a Community Service Program".

The activity of providing child care services to an individual who is participating in a Community Service Program is an activity that has been rarely used in recent years. Due to budget constraints, this activity was suspended effective January 1, 2012.

II. Hours Engaged in Work

EXCUSED ABSENCES POLICY

The State's excused absence policy is as follows:

Excused absences for scheduled participation should be recorded as attendance time not to exceed 16 hours per month of missed participation, with a limitation of 80 hours in the preceding 12-month period. Excused absences do not apply to paid work activities. Excused absences include:
sick days
medical appointments for self or family members
required appointments with other service providers
court dates
job interviews
attendance in non-countable activities
good cause granted in accordance with ODHS rule [461-130-0327](#).

Holidays

Holidays are recorded as attendance time if the holiday is observed on a day of scheduled participation. Record the normal number of hours the participant would have attended. The maximum number of holidays allowed in a calendar year is 10.

For all activities, use the normal holiday schedule of the worksite or service contractor. Recognized holidays are:

- New Year's Day
- Martin Luther King's Birthday
- President's Day
- Memorial Day
- Independence Day
- Labor Day
- Veterans' Day
- Thanksgiving Day
- Christmas Eve
- Christmas Day

Tracking of excused absences and holidays will be recorded in Oregon's JOBS tracking and data (TRACS) system by activity, and participants expected hours, actual attendance hours, excused hours, and holiday hours.

FLSA Deeming

The JOBS Activity Guidelines provides instructions to the field on how to determine the maximum number of unpaid work hours allowed for unpaid work or work experience and/or community service participation. The Family Coach or contractor staff will be responsible for individually determining the maximum number of unpaid work hours allowed. The guidelines state that the Fair Labor Standards Act (FLSA) applies to individuals working in unpaid JOBS work

activities for employers. FLSA requires that individuals engaged in these activities, in effect, cannot "work off" their TANF and SNAP benefits at an hourly rate of less than the higher of the Federal or State minimum wage.

To calculate the maximum number an individual can be required to participate in an unpaid JOBS work activity Oregon will use the following formula:

$$(\text{Monthly TANF grant amount} + \text{monthly SNAP benefits}) \div \text{the higher of Oregon minimum wage or the Federal minimum wage} = \text{Maximum number of unpaid work hours allowed.}$$

The State of Oregon will deem 80 or 100 monthly hours for single parents (120 to 250 hours for a two-parent household when the State operates a two-parent program) of participation in an unpaid work activity if the individual worked the total hours allowed in the equation above. The State system identifies individuals to deem, determines the maximum number of FLSA hours, and deems up those participants who participate the required number of FLSA hours.

The State of Oregon hereby certifies that it has adopted a "mini" Simplified SNAP Program in order to count the value of SNAP benefits.

III. Work-Eligible Individuals

Describe the procedures for identifying all work eligible individuals.

Work eligible individuals are identified by several factors. They must be an adult (or minor child head-of-household) receiving assistance under TANF or a separate state program or a non-recipient parent living in the household of a child receiving assistance. The case contains an indicator of the person's status. The indicator must show them to be a work eligible individual as either an eligible TANF recipient, a recipient of SSP-MOE or a non-recipient parent living in the household of a child receiving assistance, unless excluded.

Date of Birth is recorded in the eligibility systems. Edits require a 'JOBS status' indicator for all TANF recipients between the ages of 16 and 60.

All persons on a TANF case under the age of 19 must have the custodial and non-custodial parents listed on the case and attached to each child. Edits require entries in Mom and Dad fields and edits require a child under 19 to have a parent before a TANF case can be created.

Describe how the State ensures that, for each work-eligible individuals, 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 Federal definition.

Data input into the automated system is controlled by edits and audits that prevent many data entry errors. Updates to cases made by workers are not saved until all edits have been cleared and errors corrected. Automated reports are produced monthly for worker review. Supervisors review data entries periodically as part of quality assurance. Supportive payments such as childcare and transportation will not be issued by the system unless certain data elements are entered accurately and timely.

Attendance hours are normally tracked by contractor or work site staff that are responsible for the work activities. Hours are reviewed by ODHS staff prior to entry into the system. Attendance forms may be authorized by partner staff signing off on the form prior to data entry. Procedures similar to those in the paragraph above are in place to ensure the data entry is accurate. Contractor and ODHS staff receive the JOBS Activity Guidelines and are trained on proper coding, appropriate attendance activities, and documentation.

All activity hours are identified as either federally qualifying or not federally qualifying. Programmed logic includes only those work activity hours appropriate for reporting. Non-qualifying activities are identified by activity code and moved to a 'bucket' or separate section the system program so they are not included with reportable work activities and hours.

Documentation for Work-Eligible Individuals

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.

Minor parents who are not head-of-household (HOH) (or spouse of head-of-household) are identified and excluded based on their status entered in the eligibility system. The head of-household is easily identified by a value that also assigns them as the primary person, or case name. Edits require one person must have this designator; other edits disallow more than one person with this designation.

Programmed logic checks each person after excluding the HOH. Each person segment is checked for values that indicate the person has parents listed on the case. If the parent(s) of a child are not HOH and the age of the parent is less than 18, programmed logic excludes the minor parent from the report. Using the same logic, the spouse of a minor parent who is not HOH is determined and excluded.

A non-qualified non-citizen who is ineligible for TANF or work activities due to immigration status is identified and excluded based on the value in the TANF citizenship field. Secondary validation is done based on their status on the case. Each person on the eligibility system case has an indicator of recipient status. Once identified as a non-recipient, the citizenship value confirms the reason they should be excluded from work eligible status.

SSI recipients are identified by their status on the case. Programmed logic checks for a value on the person segment identifying an SSI recipient. As a final confirmation a database of all SSA beneficiaries, their eligibility status and benefit amount is checked using the persons SSN. This combination of validations identifies SSI recipients and, unless meeting participation requirements, excludes them from work participation reporting.

SSDI recipients are identified by their status on the case. Programmed logic checks a database of all SSA beneficiaries, their eligibility status and benefit amount is checked using the persons SSN. This identifies SSDI recipients and, unless meeting participation requirements, excludes them from work participation reporting

A parent providing care for a family member with a disability is identified by an exclusion value in the eligibility system. Verified with medical documentation from a qualified medical professional, care level needed for a disabled family member. When determined an individual is needed at home to provide care, a value is entered to indicate an exclusion. This data item is passed to the system that tracks work activities and identifies these excluded persons.

The State of Oregon uses the Americans with Disability Act of 1990's definition of a disability. Disability means, with respect to an individual, a physical or mental impairment that substantially limits one or more of the major life activities of such individual.

A family member is anyone, residing in the same dwelling, having the appearance of being related by blood, marriage, or adoption.

Medical documentation must be from a qualified medical professional making the determination of the need for care in the home and contain their name, signature, address and whether the need for care is temporary or permanent. The exclusion value identifier for a parent providing care for a disabled family member will require a second identifier to indicate whether the needed care is temporary or permanent. If temporary an end date, substantiated by medical documentation, for the exclusion will be entered.

The State of Oregon does not provide direct TANF services or assistance to Tribal TANF families. These programs are delivered by the approved Tribes. These families are not identified on our systems.

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 adults (or minor head-of-household) family members, and**
- **The proper identification of TANF families for inclusions 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.**

Oregon is using COBOL programs independently of the whole batch process when generating the FTANF and STANF reports to target and identify errors and makes fixes prior to full and complete submission of the federal report data. By using this method, the data elements are reviewed for errors and inconsistencies. Any changes to the selection criteria or program logic are identified and corrected.

The eligibility system requires that all person records have name, SSN, DOB, gender, race, ethnicity and an in-Grant value which indicates their status on the case. All persons aged 16-59 have an entry in the JOBS Status (JS) field. This field is where the work eligible status is recorded. It is a one-byte field. The case cannot be updated without an entry in this field. Edits cannot be bypassed. If an Exemption value is entered, then an Exemption Reason must be added to the Exemption field. Edits require this entry. Edits cannot be bypassed.

The JOBS participation tracking system records activities and hours of attendance with begin and end dates to control activity and attendance hours. For JPI participation tracking the eligibility system records weekly hours of attendance. The 'JPI' need resource code is used to input weekly unsubsidized employment attendance hours that have been verified by at least 2 consecutive weeks attendance and projected forward to anticipate weekly attendance for a maximum

of six months as described in section I.1.5. An end date is entered in the eligibility system to remove attendance hours at the sixth month maximum or before.

Both the eligibility system and the JOBS participation tracking system are used to determine the federal work participation status (item 49) for the TANF Data report and (item 42) for the SSP-MOE Data report.

All families with a work-eligible individual are included in the overall work participation rate unless explicitly disregarded. When the State operates a two-parent program, the two-parent work participation rate includes any family with two or more natural, step, or adoptive parents (of the same minor child) who are work-eligible individuals. The eligibility system coding requirements and edits mentioned above are used to identify families to be included in the calculation for the all families work participation rate or will not be used in accordance with Federal Field 12.

Regular review of the report criteria occurs by Business, Policy, and Research Analysts jointly with system programming staff that run either parts of, or the complete, TANF and SSP-MOE reports data. Items in error are reported out on the case and person level. Each data item for each case and person related to the error is reviewed to determine what caused the error and how it can be corrected. If the error appears to be a training issue, program and training staff are notified. Errors related to data entry into the eligibility system are corrected with edits and tested and implemented. Program logic errors are identified and technical staff makes corrections. These corrections are tested and implemented.

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.

Data input into the automated system is controlled by edits and audits that prevent many data entry errors. Automated reports are produced monthly for worker review. Supervisors review data entry periodically as part of quality assurance. Supportive payments such as childcare and transportation will not be issued by the system unless certain data elements are entered accurately and timely. This variety of controls helps ensure the accuracy of data entry.

Attendance hours are usually tracked by contractor or work site staff that are responsible for the work activities. These hours are reviewed by ODHS staff prior to entry into the system. Attendance forms may be authorized by partner staff

signing off on the form prior to data entry. Procedures similar to those in the paragraph above are in place to ensure the data entry is accurate. Contractor and ODHS staff receive the JOBS Activity Guidelines and are trained on proper coding, appropriate attendance activities, and documentation.

The automated system stores these hours and the programmed logic determines the final calculation to be used in the Federal Report.

All activity hours are identified as either federally qualifying or not federally qualifying. Programmed logic includes only those work activity hours appropriate for reporting. Non-qualifying activities are identified by activity code and moved to a 'bucket' or separate section of the program. This ensures they are not included with reportable work activities and hours.

Data input by ODHS and Contractor staff will be reviewed by a sample of actual cases. The purpose of the review sample is to ensure:

- a. Staff input attendance hours, document attendance and record activities in accordance with the JOBS Activity Guidelines.
- b. Staff follow appropriate procedures for excused absences, holidays, maximum number of unpaid work hours allowed, and projecting actual hours of paid employment.
- c. Staff follow appropriate procedures for the minimum frequency of attendance reporting and certifying supervision requirements.
- d. Verification procedures are working properly, and
- e. Staff correctly input case characteristics for the TANF Data Report such as receipt of childcare, age of child, age of adult or teen parent, satisfactory school attendance, and families of a disabled family member.

IV. Internal Controls

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

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

Oregon will maintain all pertinent findings produced through its internal control processes and these finding will be available for use by ACF and other auditors in their review of the State's work participation verification system.

Oregon will submit an amended Work Participation Verification Plan as changes are completed.

Describe the internal controls implemented to ensure established work verification procedures are properly being employed.

Policy Directives

Staff training - preliminary site training and review

- a. Training is delivered on expectations around attendance collection, documentation, appropriate duties for JOBS activities, and non-attendance follow-up.
- b. Review JAG.
- c. Review attendance forms, TRACS attendance entry process, non-attendance follow-up and management review procedures.
- d. Training provided ongoing through TANF and Case Management scheduled trainings and refresher courses as needed.

Quality Assurance

Data input by ODHS and Contractor staff is reviewed by a sample of actual cases (see section 4 below). The purpose of the sample review is to ensure:

- a. staff input attendance hours, documented attendance, and recorded activities in accordance with the JAG,
- b. staff followed appropriate procedures for excused absences, holidays, maximum number of unpaid work hours allowed, and projecting actual hours for paid employment,
- c. staff followed appropriate procedures for the minimum frequency of attendance reported and certified supervision requirements,
- d. verification procedures work properly, and
- e. staff correctly input case characteristics for the TANF and SSP-MOE Data Report such as receipt of childcare, age of child, age of adult or teen parent, satisfactory school attendance, and families with a disabled family member.

Field Case Reviews will be conducted to:

- a. ensure field compliance with Federal participation requirements include case characteristics for the TANF and SSP-MOE Data Report such as receipt of childcare, age of child, age of adult or teen parent, satisfactory school attendance, and families with a disabled family member;

- b. validate the accuracy of data reported including the examination of documentation for reported hours, review verification procedures to ensure compliance, and
- c. ensure that ODHS and contractor staff adhered to Federal regulations to document, count and report hours of participation.

Individual cases identified as that have incorrect information will be corrected and re-reported for an accurate participation report.

Workforce Partners

Statewide meetings are held with workforce partners and program managers to provide information regarding policy updates, program changes and current TANF program performance on a quarterly or as needed basis.

Contract monitoring will be used to determine whether providers meet contractual supervision and documentation requirements and providing accurate and timely reporting of actual hours of participation each month in the Transition Referral and Participant Self-Sufficiency (TRACS) system.

Describe the internal controls to control for data errors, including transcription and coding errors, data omissions, computation errors, and compilation errors.

The online Client Maintenance System (CMS) and TRACS systems have edits and warning messages that prevent the user from entering dates and data types outside of tolerable ranges. Edits are also in place to ensure required fields are not omitted.

Family Coaches, management and contractor staff utilize three main tools to review, manage, and track individuals' participation and progress. These are:

- a. Score Card report: Monthly reports to management staff that show current participation rates and historical rates. The reports are reviewed with Division administrators and provide a quick view of progress towards participation outcomes.
- b. Monthly Participation Detail: Branch offices and partner staff are provided with detail monthly reports regarding which participants are counted towards the participation Score Card report.
- c. Snapshot Report: Branch offices and partner staff are provided a weekly or biweekly snapshot of what activities an individual is participating in, what participants are not meeting their participation plan requirements and

participant contact information to determine appropriate next steps, including scheduling re-engagement reviews as needed.

These tools are reviewed as noted and provide a secondary validation of the data by the field staff inputting the required characteristics and participation information that populates the data elements.

Describe the checks used to isolate electronic systems and programming errors and the steps to ensure that all work participation reports items are internally consistent.

TANF and SSP-MOE Data Report programming requirements are set for each of the federal elements which correlate to specific fields on Oregon's eligibility and case management systems.

A system for generating requests or “tickets” called Alexsys, is used to begin work on identified needs requiring technical support. The mainframe documentation used to support the data for the TANF or SSP-MOE Data Reports is monitored to ensure data integrity. Business requirements are amended each time a programmer accesses or updates the states TANF or SSP-MOE Data Report systems. This document and process provides control over access and changes that affect the system integrity.

Describe any sampling and estimation techniques employed in data validations.

Field Quality Assurance Reviews will be performed using a monthly sample review of work-eligible individuals reported as meeting Federal participation requirements for the most recent report period:

The estimated sample size of the Quality Assurance Review will be a random 10 percent sample of all work eligible individuals meeting Federal participation requirements.

Reviews will be on-going and conducted on a monthly basis.

Reviews will consist of verifying:

- a. JOBS activity attendance documentation is appropriate and in accordance with the JOBS Activity Guidelines (JAG).

- b. JOBS activity hours are documented with acceptable document sources per the JAG. Excused absences and holidays are granted in accordance with the JAG and do not exceed limits.
- c. Self-employment participation hours are equal to gross income less business expenses divided by the Federal minimum wage.
- d. Unsubsidized employment projected actual hours are calculated correctly.
- e. JOBS activities are performed in accordance with the definition established in the JAG and Federal regulations.
- f. Follow-up action was taken on non-attendance.

Findings

- a. Findings will be issued to the TANF Manager or designee, District Manager or designee, and District Self-Sufficiency Managers within 60 days of the review completion.
- b. The District will be required to report back, within 60 days, action taken to correct audit citations.
- c. The state will maintain pertinent findings and make them available for use by ACF or other auditors in their review of the work verification system.

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

For each of the data elements, describe the State's data validation procedures to ensure "complete and accurate" data reporting.

Reporting Month: The reporting month is directly input based on the month/quarter being reported. Information for elements downstream is determined based on this element.

Stratum: Oregon does not utilize a sample reporting method, thus there is no stratum.

Case Number: This information is taken directly from the eligibility system.

Disposition: Oregon does not utilize a sample reporting method.

Type of Family: The programming code loops through a series of tests to determine type of family.

- a. The programming tests the parent status of any adults using parent indicators on the case record.

- b. Edits in the eligibility system require parent indicators for all persons under age 19.
- c. Two parents are required for each child; the parent may be coded as Mom, Dad, or absent.
- d. There are also exception values for exceptional situations (e.g. single parent adoption).
- e. The case record cannot be updated unless all children have both parent indicators and the values are correct.
- f. Edits will prevent update and there is no bypass process, even for super users.

The eligibility system has a payee indicator, the equivalent of HOH (Head of Household). One person on the case must have this designation or the record cannot be updated. This edit cannot be bypassed.

The type of family is determined based on the work eligible indicators as follows: IF WEI = '1', '2', or '5', then work eligible. If both adults are parents and work eligible, then '2', if not '2' and at least one person is work eligible than '1', Else '3' - child only family, not work eligible.

Amount of SNAP Assistance: The system programming retrieves information from the SNAP payment system for the family and determines if they received benefits in the report month. If yes, amount of SNAP provided are captured and reported.

Receives Subsidized Child Care: The system programming reviews the provider pay system and checks for childcare pay reason codes in the benefit month and amount, if amount is greater than zero, then '1', else '3'.

Amounts of TANF (and SSP-MOE) Assistance: If the funding stream is State only funds then '0'. Else the automated system accumulates check amounts from the tables for the Participant Maintenance Case Issuance History Screen. If payments are cancelled, they are excluded.

Family Affiliation Code: The system programming searches the case record on the eligibility system and captures family affiliation as follows:
 If the person is coded as an adult eligible to receive assistance, then '1'.
 If the person is coded as not eligible to receive assistance and the parent indicator shows they are Mom or Dad for a child on the case (person under 19) then '2'.
 If the person is coded as not eligible to receive assistance and the parent indicator shows they are not a parent of any child on the case, then '3'.

If the person is coded as not eligible to receive assistance, they are less than 19 and the parent indicator shows the person to have the same parent as another child on the case then '4'.
Else '5'.

Non-Custodial Parent Indicator: Oregon does not currently have a program to provide non-custodial parents assistance.

Date of Birth (DOB) Adult: The programmed code uses DOB entered on the eligibility system. Otherwise, if FF30 = '1' then DOB '00000000'. If FF 30 > '1' then '9999999'.

Relationship to Head-of-Household: The programming reviews coding on the eligibility system to determine parentage. The parent indicator shows they are the Mom or Dad for a child on the case (person under 19). A separate index screen captures the relationship between adult members on the case to the head-of-household. The system then double checks the type of family to apply the correct coding to this element.

Relationship with Minor Child: The programming reviews coding on the eligibility system to determine parentage. The parent indicator shows they are Mom or Dad for a child on the case (person under 19). The system then double checks the type of family to apply the correct coding to this element.

Work Eligible Individual Indicator: The programming code validates the data on several levels. First checking citizenship status coding, then checking if they are a parent: the parent indicator shows they are Mom or Dad for a child on the case (person under 19), then checks for: needed in the home to care for a family member with a disability coding, receipt of SSI or SSDI coding, sanction status coding and receipt or non-receipt of assistance. These factors allow the coding of this element to be complete and accurate.

Date of Birth -Child: The programmed code uses DOB entered on the eligibility system. Otherwise, if FF30 = '1' then DOB '00000000'. If FF 30 > '1' then '9999999'.

As a measure of continuous improvement, a TANF Requirement Workgroup scheduled regular meetings to review any reports back from data transmissions, continued coding improvements, and system changes that may affect coding for the TANF or SSP-MOE Data reports.

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

TANF Requirements Workgroup meets to review the programming logic related to the TANF and SSP-MOE data report requirements and the Error, Inconsistencies and Frequency files received back from transmission.

Error reports received after submitting the federal report are reviewed for inconsistencies in program logic. Cases and individuals that have the indicated errors are manually reviewed to determine root causes such as program logic, selection criteria, or systems edits.

Programming staff identify records with data element relational errors. They are reported out and reviewed on a case by case basis. Inconsistencies are identified and corrected if needed.

Work Participation Status

Describe the State's procedures to ensure that a family is not disregarded from the work participation rate for more than 12-months per lifetime based on being a single custodial parent with a child less than one year of age.

For a single custodial parent, a separate table records the number of months a child in the household is under 12 months old and the number of months the head of household (HOH) has received exclusion for a child less than 12-month. Once the limits are reached, the exclusion stops and their work participation status is reset. The record is flagged and no further disregard is allowed.

Describe the State's procedures to ensure that a family is not disregarded from the work participation rate for more than three months in any period of 12 consecutive months based on a work eligible individual's refusal to participate in work.

A separate table records the number of months work participation is disregarded due to refusal to participate. If more than three months are recorded as disregarded in a 12-month period, the disregard stops and the work participation status is then determined based on codes '06' through '19'

Describe the State's procedures for ensuring a family deemed engaged in work based on 20 hours of participation in countable work activities meets the requirements of a single custodial parent or caretaker relative with a child under age six.

Single custodial parents are identified using values from the eligibility system. The age of the child is validated by the system each month to ensure the age requirement is met. The automated system checks for the Type of Family for Work Participation (FF12), if this is '01' and there is no other parent on the case, then it cross checks the hours of participation in the countable work activities. If hours in the countable work activities total more than or equal to 20, then the family is deemed engaged in work based on 20 hours of participation.

VI. Certification

This is to certify that Oregon's TANF Work Verification Plan dated January 1st, 2021 includes all the information required by the Regulations at 45 CFR 261.62(b) and accurately reflects the provisions under which Oregon will be operating effective January 1st, 2021.

Ray Miller, TANF Program Manager
Oregon Department of Human Services Self-Sufficiency