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

Effective Date: October 1, 2018

Safety, health and independence for all Oregonians.
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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 were issued to field staff to:

- describe the purpose of each activity;
- provide consistent definitions of activities, including appropriate and inappropriate assignments for each activity; and
- outline acceptable documentation of attendance for participation.

The JOBS Activity Guidelines were revised to reflect the new requirements of the Final Rules on the Reauthorization of TANF. The guidelines were expanded to provide additional information, including:

- definition of allowable activities and mandatory clients;
- acceptable attendance documentation; and
- definitions and clarification of important terms.

The JOBS Activity Guidelines were the basis for training provided in 2006 to State field managers, case managers, 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.
A. Unsubsidized Employment Including Self-Employment

1. Describe the services or programs the State includes under Unsubsidized Employment

Individuals in the State of Oregon who are employed in an unsubsidized job and receiving TANF benefits are enrolled in the Unsubsidized Employment activity. The definition for this activity is full- or part-time unsubsidized employment for TANF clients in the public or private sector that is not subsidized by TANF or any other public program.

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. Oregon's JOBS tracking and data (TRACS) entry activity codes for unsubsidized employment are: (1) WO – unsubsidized employment for clients in TANF and (2) MI - micro-enterprise. The Job Participation Incentive (JPI) also tracks attendance on unsubsidized employment. Those participation hours are captured within the agency's Client Maintenance (CM) system using a JPI code and the appropriate weekly hours.

A case plan, also known as a personal development plan (PDP) is completed on all JOBS program clients. This plan is a written outline, developed by the client and the DHS case manager, with input from partners as appropriate. The case plan lists all the activities and goals for the client, including start and end dates, scheduled activity hours, and client and DHS responsibilities. A copy is provided to the client and a copy is maintained in the client's file.

Case management staff has been instructed to use the following activity codes:
WO - Post TANF: Due to budget constraints the Post TANF component was suspended May 1, 2012.

WO – Unsubsidized Employment: This activity is for TANF clients 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: Self-employment for clients focusing on assisting and supporting reasonable small business opportunities. Oregon Administrative rules concerning micro-enterprise are as follows:

- The intent of the microenterprise component is to support clients in self-employment.

- "Microenterprise means a small business that has fewer than five employees and capital needs no greater than $35,000. Typical microenterprises include child care, arts and crafts and business and personal services such as computer repair or hair care.

- The microenterprise component of JOBS is a subset of self-employment. This means that there may be clients participating in JOBS who are self-employed but who are not in the microenterprise component.

Expectations for individuals in an MI activity:
- Client must have a plan for their business that has been approved by a third-party expert entity. A
"third party expert entity" includes a member agency of the Oregon Microenterprise Network (OMEN), the Small Business Administration, the Service Corps of Retire Executives (SCORE) or other entity approved by the Department.

- Client must provide their case manager with documentation that a third-party expert entity has approved their business plan. The approved business plan must include provisions for review of the client's microenterprise progress by the approving third party expert entity.
- Any cost to the client of having a business plan prepared or approved is considered a business expense and is an allowable deduction from the client's gross income.
- A client in the microenterprise component must participate in the microenterprise component for the number of hours required by the JOBS program or in a combination of the microenterprise component and other appropriate JOBS activities for the number of hours required by the JOBS program.
- Client in the microenterprise component may participate in a number of business-related activities to support their microenterprise. Examples of business-related activities that would support a client's microenterprise include designing and creating products, making sales calls, taking classes to increase business skills, etc.
- A client in the microenterprise component must provide an income statement semi-annually to the Department. This income statement must be prepared by a certified public accountant, bookkeeping firm, or other entity approved by the Department, according to generally accepted accounting principles and OAR 461-145-0920. "Other entity approved by the Department" includes OMEN, SBA and SCORE.
Client in the microenterprise component does not need to report self-employment income on the self-employment income form (DHS 859B).

A client normally may participate in the microenterprise component for no more than 12 consecutive months.

Case managers must contact the Central Office JOBS Unit and get prior approval if they have a client who wishes to participate in the microenterprise component for a second or subsequent period of time.

**JPI – Job Participation Incentive:** JPI provides a monthly benefit to participants that are working in unsubsidized employment but are not receiving the TANF cash benefits. Clients must meet TANF modified eligibility requirements including maintaining a minor child in the household, Oregon Residency, have 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 that are working in unsubsidized employment and have gone over-income for the TANF cash grant. Clients must meet TANF modified eligibility requirements including maintaining a minor child in the household, Oregon residency, and have a family income that is below 300 percent of the Federal Poverty Level.

2. **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 are paid work time.
Countable hours for unsubsidized employment are based on employer issued reports indicating paid hours.

Phone verification from employers of work hours are accepted if, a pay stub cannot be obtained. The caseworker needs to document the substance of such a call, including who verified the work hours, for the case file.

3. 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 actual hours or projected actual hours will be documented with one of the following items:

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

The policy for projecting actual hours for paid employment is described later in this document.

The guidelines for attendance documentation are:

- All attendance documentation must be maintained in the client’s case file or narrated in the TRACS case file.
- Attendance will be documented with third party reporting, such as from contractors, employers, service providers, or others who can attest to the client’s attendance.
• All unsubsidized employment attendance documents and documentation received from the employer by phone should include: the participant’s name; actual hours of work; name of the employer.

• 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).

• Attendance recorded in TRACS must be documented based on the items listed above.

• Participation in unsubsidized employment activities must be documented.

4. 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.

The State of Oregon defines self-employment as an individual who is drawing an income from a trade or business and works for himself/herself instead of as an employee of another person or organization.

Self-employment hours are determined by calculating: (gross income minus allowed business expenses) ÷ the Federal or Oregon minimum wage for WO and JPI participants. Income and expenses, defined in Oregon's rule 461-145-0920, must be documented and retained in the client's file. Self-employed clients not in the Microenterprise activity have no business deductions excluded as stated in Oregon’s rule 461-145-0930.
In order to determine participation hours for Microenterprise participants Oregon uses their countable gross income (prior to deducting business expenses) ÷ the Federal or Oregon minimum wage for WO and JPI participants.

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

Attendance will be recorded for paid employment using projected actual hours. If the client's work hours are not likely to change, projected actual hours can be calculated as follows:

Determine the client's average number of hours worked per week based on at least two consecutive weeks. JOBS paid work attendance will be entered for the next six months on this basis.

Tina worked 25 hours per week for the past two consecutive weeks. Tina expects to work a similar schedule. Attendance can be recorded in TRACS for the average actual hours of the past two weeks and at 25 hours per week for the next six months.

During the past two weeks, Joan worked 10 hours the first week and 30 hours the second week. Joan expects to work a similar schedule. Average the hours \((10 + 30 = 40 ÷ 2 = 20)\) for the past two weeks. Record the actual average attendance in TRACS for the past two weeks and continue at 20 hours per week for the next six months. Weekly averages should be rounded to the nearest whole hour.

Projected Actual Hours cannot be used if the client expects to work less hours than the verified hours worked during at least two consecutive weeks.
If DHS becomes aware that the individual's work situation has changed, for example as the result of a benefit adjustment, and has resulted in an increase or decrease in work hours, DHS will document the new hours and project attendance for the remainder of the six months.

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

Documentation for determining average hours worked per week must be retained in the client's case file or TRACS case file.

B. Subsidized Employment

As program operations are the same, answers concerning subsidized private sector employment and public-sector employment have been combined. The State of Oregon does maintain a tracking system that enables us to separate subsidized private and public-sector employment participation hours.

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

The State of Oregon operates a subsidized private and public-sector employment program called JOBS Plus. Through JOBS Plus, participants are placed in subsidized employment in the public or private sector. They are placed on the employer’s payroll and TANF & SNAP benefits are diverted. JOBS Plus participants are considered temporary employees of the employer and are entitled to the same benefits as other temporary employees of that employer.

Oregon’s JOBS tracking and data (TRACS) entry activity code for subsidized employment is: PL - JOBS Plus Program.
Prior to enrollment in any activity, local program staff gather information to identify a client's strengths, interests, family circumstances, education, employment history, involvement with other social agencies, support services needed, and, if appropriate, drug and alcohol, mental health, and/or learning needs assessments. The State approved *Family Assessment tool*, is used to gather this information and is required to be completed for all mandatory TANF clients. This assessment process will help match the client and the appropriate service.

A case plan, also known as a personal development plan (PDP) is completed on all JOBS program clients. This plan is a written outline, developed by the client and the DHS case manager, with input from partners as appropriate. The case plan lists all the activities and goals for the client, including start and end dates, schedule activity hours, and client and DHS responsibilities. A copy is provided to the client and a copy is maintained in the client's file.

Staff have been instructed to use these codes as follows:

**PL - JOBS Plus Program:** Oregon has been operating the JOBS Plus Program since 1994 under Oregon law statute 411.877-96. Oregon Revised Statutes concerning JOBS Plus are as follows:

- The intent of JOBS Plus services is to enhance employability for clients unlikely to be hired at their current skill level for their short-term job goal. JOBS Plus provides an incentive to clients and employers by converting SNAP and TANF benefits into wages.
- JOBS Plus placements must not require the participant to work over 40 hours per week, must not displace regular employees or positions, must not pay below the Oregon minimum wage, must offer Workers' Compensation, and must offer the same benefits given
to other temporary employees, including paid leave time and group health insurance.

- Participants may be required to complete one day of job search each week after their fourth month of placement; the employer treats this as paid time.

- Employers must:
  o maintain comparable levels of health, safety and working conditions for JOBS Plus participants;
  o provide on-the-job training sufficient to allow the participant to perform their duties;
  o provide a mentor to orient the JOBS Plus participant to help the participant be successful in the workplace; and
  o repay reimbursements if they violate any JOBS Plus program rules.

- JOBS Plus employers are reimbursed from the JOBS Plus Program Special Fund for up to 40 hours per week for wages paid to a participant at a rate not exceeding the state minimum wage, plus the employer’s share, per the Work Site Agreement, of Social Security, federal and state Unemployment Compensation and Workers’ Compensation. The employer bills DHS on the specified form by the twentieth of the month, for the time period from the sixteenth of the prior month through the fifteenth of the current month. DHS calculates the wage using the state minimum wage times hours worked, including paid sick, holiday and vacation time. After four months in the placement, this includes up to eight hours per week job search.

2. 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 hours of participation for subsidized employment are paid work time, including paid hours not worked and paid job search hours.
Countable hours for subsidized employment are normally based on the billing form submitted to the Department's Direct Pay Unit (DPU). JOBS Plus employers submit a monthly Wage Reimbursement Billing form (WRB) to 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).

Local staff have the option of obtaining and recording paid hours directly from the JOBS Plus participant. Attendance hours for JOBS Plus participants entered by local staff will be based on employer issued reports, such as pay stubs or time cards indicating paid hours.

Attendance from employer-reported work hours is entered by DHS staff on the PL activity. Determinations of the client's progress and case plan modifications must be narrated in TRACS. Good cause determinations must be determined for lack of progress or non-cooperation and recorded in TRACS.

3. 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:

- pay stubs,
- time cards, or
- sign-in/sign-out sheets, rosters, attendance records, or other employer produced documents with recorded hours of work.
JOBS Plus paid hours worked are reported and certified by the employer to a central location - DHS' Direct Pay Unit (DPU). DPU can enter JOBS Plus attendance reported from the employer on the Wage Reimbursement Billing form (WRB) into TRACS. Employers are required to submit a WRB form once a month. Attendance can be entered by field staff if documented using the above procedures.

4. 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 - Documentation for Unsubsidized Employment (5).

The guidelines for attendance documentation are:
- All attendance documentation must be maintained in the client's case file or narrated in the TRACS case file.
- Attendance will be documented with third party reporting, such as from contractors, employers, service providers, or others who can attest to the client's attendance.
- All subsidized employment attendance documents should include: the participant's name; actual hours of work; name of the employer.
- 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).
- Attendance recorded in TRACS must be documented based on the items listed above.
• Participation in activities must be supervised and documented.

C. Work Experience

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

The definition of Oregon's work experience program is unpaid work to develop good work habits, skills, training and knowledge to obtain employment. Work experience provides skills that enhance the likelihood the client will become employed. Work experience is available through private-for-profit businesses, nonprofit organizations or public agencies. Work may be at a work site or in a work simulation activity but must be supervised daily by the work site employer, contractor, or agency staff. Sheltered or Supported Work involves more intensive staff support.

Oregon's JOBS tracking and data (TRACS) entry activity codes for work experience are: (1) WE – work experience and (2) SW – sheltered or supported work.

Prior to enrollment in any activity, local program staff gather information to identify a client's strengths, interests, family circumstances, education, employment history, involvement with other social agencies, support services needed, and, if appropriate, drug and alcohol, mental health, and/or learning needs assessments. The State approved Family Assessment tool, is used to gather this information and is required to be completed for all mandatory TANF clients. This assessment process will help match the client and the appropriate service.

Staff have been instructed to use these codes as follows:
**WE - work experience:** An activity in which the client works without pay at a job site to develop good work habits and basic vocational skills that enhance the likelihood the client will become employed.

**SW - sheltered or supported work:** like work experience, sheltered or supported work is an activity in which the client works without pay at a job site to develop good work habits and basic vocational skills that enhance the likelihood the client will become employed. However, clients in this activity are provided with more intensive staff support, skill training, intervention and counseling that will enable them to function independently at work.

A case plan, also known as a personal development plan (PDP) is completed on all JOBS program clients. This plan is a written outline, developed by the client and the DHS case manager, with input from partners as appropriate. The case plan lists all the activities and goals for the client, including start and end dates, scheduled activity hours, and client and DHS responsibilities. A copy is provided to the client and a copy is maintained in the client's file.

The working conditions for clients participating in work experience must not violate applicable state and federal health and safety standards or require activities not considered usual and customary in the occupation for which the participant is being trained.

Clients participating in work experience or supported work are covered by a State workers' compensation policy.

2. **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 work time, 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 (work experience and sheltered work).

To calculate the maximum number of hours an individual can be required to participate in an unpaid JOBS work activity (work experience, sheltered work, and community service) Oregon will use the following formula:

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

Under the FLSA calculation, if a client participates the maximum number of hours allowed, they will be "deemed up" to the full required monthly core hours.

3. **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 must be documented no less than every two weeks.

Hours will be documented with one of the following items:
- time cards, sign-in/sign-out sheets,
- rosters, other employer documents with recorded hours of work,
- contractor reporting, or
- attendance reports from the worksite.
The guidelines for attendance documentation are:

- All attendance documentation must be maintained in the client's case file or narrated in the TRACS case file.
- Attendance will be documented with third party reporting, such as from contractors, employers, service providers, or others who can attest to the client's attendance.
- All work experience attendance documents should include: the participant's name; actual hours of work; name of the employer; and name and phone number of the person verifying hours.
- Attendance recorded in TRACS must be actual hours of participation, not scheduled hours or based on exceptional reporting (assuming participation is occurring unless notified otherwise).
- Attendance recorded in TRACS must be documented based on the items listed above.
- Participation in activities must be supervised and documented.

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

Oregon will require daily supervision of all unpaid work activities. This policy will be explained to all work sites. Work sites must agree to provide daily supervision to all TANF clients.

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

D. On-the-Job Training

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

The definition of Oregon's On-the-Job Training (OJT) program is training that is given to a paid employee who is engaging in productive work that provides knowledge and skills necessary to perform the job. The employer trains the client and is reimbursed (usually 50% of wages paid) for these OJT services. Workforce partners, such as WIA and Vocational Rehabilitation Services, enter into direct OJT contracts with employers.

Oregon's JOBS tracking and data (TRACS) entry activity code for OJT is: JT - on-the-job training.

Prior to enrollment in any activity, local program staff gather information to identify a client's strengths, interests, family circumstances, education, employment history, involvement with other social agencies, support services needed, and, if appropriate, drug and alcohol, mental health, and/or learning needs assessments. The State approved Family Assessment tool, is used to gather this information and is required to be completed for all mandatory TANF clients. This assessment process will help match the client and the appropriate service.

A case plan, also known as a personal development plan (PDP) is completed on all JOBS program clients. This plan is a written outline, developed by the client and the DHS case manager, with input from partners as appropriate. The case plan lists all the activities and goals for the client, including start and end dates, scheduled activity hours, and client and DHS
responsibilities. A copy is provided to the client and a
copy is maintained in the client's file.

Staff have been instructed to use this code as follows:

**JT - On-the-Job training:** An activity in which a client
works for an employer for a contracted period. The
employer trains the client and is reimbursed by the
Department or other entity, usually at 50 percent of the
wages of the participant, for those training costs.

DHS cannot require a client to participate in an OJT in the
following circumstances:

- the client would displace a currently employed
  worker or position or would cause a reduction in
  regularly scheduled hours, wages or benefits of a
  current employee.
- the assignment would impair an existing contract for
  services or a collective bargaining agreement.
- the assignment occurs at the same time another
  person is laid off from the same or an equivalent job
  within the same organizational unit or an employer
  terminates an employee or reduces its work force
  by hiring an OJT participant.
- the assignment infringes in any way on promotional
  opportunities of a current employee.

The working conditions for clients participating in OJT
must not violate applicable state and federal health and
safety standards or require activities not considered usual
and customary in the occupation for which the participant
is being trained.

Clients participating in OJT who are covered by a
workers’ compensation system are entitled to the same
level of benefits under the same conditions as other
persons similarly employed.
2. 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 On-the-Job Training are paid work and training time.

Countable hours for OJT are based on employer issued reports indicating hours worked or workforce partner attendance reports.

3. 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. Current actual hours or projected actual hours will be documented with one of the following items:

- pay stubs,
- time cards, or
- sign-in/sign-out sheets, rosters, attendance records, or other employer produced documents with recorded hours of work and/or training.

The guidelines for attendance documentation are:

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

• 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).

• Attendance recorded in TRACS must be documented based on the items listed above.

• Participation in activities must be supervised and documented.

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

As opposed to subsidized employment, all On-the-Job Training sites require the employer to provide a written training outline for the TANF client. The training outline describes the duties that the client will be trained for, timeframes for the training, and the worksite staff person who will be coordinating the training activities.

5. 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 On-the-Job Training is the same as the policy for unsubsidized employment described in Section I - Documentation for Unsubsidized Employment (5).

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

Oregon’s job search and job readiness assistance program includes a number of activities. Staff have been instructed to use these codes as follows:

**DA - drug & alcohol treatment:** Activities to reduce barriers to employment caused by substance abuse. Must be determined to be necessary and certified by a qualified professional.

**Drug & Alcohol Treatment:**
- substance abuse screening and/or evaluation
- outpatient or residential drug and/or alcohol treatment
- attending support or community groups such as (AA, NA, Al-Anon)
- medication management

**JO - job search:** Activities in seeking or obtaining employment, preparation to seek or obtain employment, improving skills in finding or competing for employment.

**Job Search:**
- developing writing resumes
- developing interviewing skills
- contacting and interviewing with employers
- completing and submitting employment applications
- gathering information concerning the labor market
- job search preparation classes
- job search logs
- travel time between employer contacts
- Time spent with placement agencies such as the Employment Department, staffing companies, or employment specialists.
LS - life skills: Development of skills that prepare clients to be successful in the workplace.

Life Skills:
- development of work place skills, habits, and behavior
- communication skills
- employment retention skills
- budgeting

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.

Mental Health Treatment:
- mental health screenings and assessments
- counseling sessions and treatment
- medication management
- support groups.

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

Rehabilitation Activities:
- medical or therapeutic screenings and assessments
- medical or therapeutic sessions and treatment
- medication management
- support groups.
Oregon’s JOBS tracking and data (TRACS) entry activity codes for job search and job readiness activities are:

- DA- drug and alcohol treatment;
- JO - job search;
- LS - life skills;
- MH- mental health treatment; and
- RA - rehabilitation activities.

Prior to enrollment in any activity, local program staff gather information to identify a client's strengths, interests, family circumstances, education, employment history, involvement with other social agencies, support services needed, and, if appropriate, drug and alcohol, mental health, and/or learning needs assessments. The State approved *Family Assessment tool*, is used to gather this information and is required to be completed for all mandatory TANF clients. This assessment process will help match the client and the appropriate service.

Additional assessments are offered for individuals identified with substance abuse, learning disability or mental health issues.

A case plan, also known as a personal development plan (PDP) is completed on all JOBS program clients. This plan is a written outline, developed by the client and the DHS case manager, with input from partners as appropriate. The case plan lists all the activities and goals for the client, including start and end dates, scheduled activity hours, and client and DHS responsibilities. A copy is provided to the client and a copy is maintained in the client's file.

2. 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 program are based on actual hours of attendance and are based on the following:

- For drug and alcohol treatment, attendance forms are submitted by the drug and alcohol treatment service provider and must contain the participant’s name, hours of participation, name of the drug and alcohol treatment service provider, name and phone number of the person verifying the participation hours, and that the client has been supervised daily.
- For job search, direct employer contact participation, job search logs (including the DHS form 475) are completed by the client and submitted to DHS or Contractor for review and approval. The job search log contains the date of the job search, employer name, address and phone number, person talked to, type of contact, contact result, time spent with the employer, and that the client has been supervised daily.
- For job search activity components, attendance forms are submitted by the job search activity provider and must contain the participant’s name, hours of participation, name of the job search activity, name and phone number of the person verifying the participation hours, and that the client has been supervised daily.
- For life skills, attendance forms are submitted by the life skills activity provider and must contain the participant’s name, hours of participation, name of the life skills activity provider, name and phone number of the person verifying the participation hours, and that the client has been supervised daily.
- For mental health treatment, attendance forms are submitted by the mental health treatment service provider and must contain the participant’s name, hours of participation, name of the mental health treatment service provider, name and phone number of the person verifying the participation hours, and that the client has been supervised daily.
number of the person verifying the participation hours, and that the client has been supervised daily.

- For rehabilitation activities, attendance forms are submitted by the rehabilitation activity service provider and must contain the participant's name, hours of participation, name of the rehabilitation activity service provider, name and phone number of the person verifying the participation hours, and that the client has been supervised daily.

Countable hours for job search and job readiness activities are based on service provider issued reports indicating hours of service, state approved attendance job search logs, or contractor attendance reports.

Oregon's job search and job readiness assistance excused absence and holiday definitions and policies are determined using the method described in Section II - Hours Engaged in Work.

3. 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 weekly. Hours will be documented with one of the following items:

- contractor reporting;
- state approved job search logs;
- state approved drug & alcohol treatment, mental health treatment and rehabilitation activities attendance form;
- treatment provider reporting;
- support group reporting;
- clinical or medical staff reporting.
The guidelines for attendance documentation are:

- All attendance documentation must be maintained in the client's case file or narrated in the TRACS case file.
- 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 client's attendance. Job search contacts will be documented by the client using a state approved job search log (including the DHS Form 475) which will contain the following information: 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 client and submitted to DHS or appropriate Contractor for verification and approval.

State approved job search logs will be used as follows:

- participants will be required to complete for all non-classroom job search activities;
- hours must be reported on a daily basis and turned in to a designated DHS or Contractor staff;
- logs will contain actual hours of employer job contact preparation, interviews, job application, time spent with the Employment Department, staffing companies, or employment specialists, and follow-up action (such as thank you notes and phone calls);
- logs will contain employer information including company, contact person, phone number, and address;
- Incomplete logs will not be accepted;
- DHS will conduct periodic reviews for completeness, verification of employer information, legitimacy of contacts, alphabetical ordering of job search contacts, common lists of contact names, and if required, contact of employer.
All job search and job readiness attendance documents should include:

- the participant's name;
- actual hours of participation;
- name of the service provider; and
- name and phone number of the person verifying hours.

Distance learning for on-line coursework must be documented, verified, and supervised in the same manner as other job readiness activities, however, site specific computer print outs indicating elapsed time of job readiness preparation will be acceptable. Where elapsed time is not available to determine attendance hours the State will use approved curricula with fixed number of hours for each assignment based on the extent the learner engaged in, or completed, the assignment. If a fixed number of hours of credit is determined for a learner to pass a test or complete a lesson, the state may use verification of passing a test or lesson as documentation of those hours.

A random sample of the job search logs will be reviewed and verified for accuracy as described in Section IV 4. of this verification plan. If systematic data validation issues are discovered, adjustments to reported hours of participation for self-directed job search will be made. These adjustments involve backing-out of the participation report any unverifiable cases and developing a corrective action plan if the error rate exceeds 10 percent.

Attendance recorded in TRACS must be actual hours of participation, not scheduled hours or based on exceptional reporting (assuming participation is occurring unless notified otherwise).

Attendance recorded in TRACS must be documented based on the items listed above.
Participation in activities must be supervised and documented.

4. **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 service providers, contractor staff, and DHS case managers. Service providers and contractor staff must agree to provide daily supervision to all TANF clients.

   Although supervision may not involve daily contact, daily supervision does include the daily assignment of tasks or duties, oversight of the client's participation, and access to a Case Manager 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 Case Manager via a Personal Development Plan.

5. **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 by local self-sufficiency staff based on a number of factors, including:
   - Client’s self-disclosure of barriers and other employment-related information on the Family Assessment tool.
   - 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 client’s need for treatment, including diagnosis and prognosis.

- Results of learning needs screening followed by subsequent referral to the service provider for learning needs assessment as indicated.
- Information provided by a physician regarding a client’s abilities and limitations and the effect of a client’s limitations on their ability to work or do work-related activities.
- Observations by Self-Sufficiency staff and non-clinical contracted staff through the course of the case.
- Observations by contracted staff who are A&D or mental health specialists or nurses through the life of the case.
- Joint staffings (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 client 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 clients 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 clients 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.
6. 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).

Oregon is now classified as a needy state and will be reporting job search and job readiness assistance based on no more than 12 weeks (four consecutive weeks) in the preceding 12-month period. Oregon will limit the reporting of job search and job readiness activities as a core activity to no more than 240 hours in the preceding 12-month period for single custodial parents with a child under age 6 and no more than 360 hours in the preceding 12-month period for all other work eligible individuals.

Oregon’s process creates a file of all clients on all cases along with an associated count of each client’s weeks of job search and job readiness assistance. This count is used to derive Federal Field 55, Job Search and Job Readiness Assistance.

From this count two separate processes occur to ensure Oregon reports no more than a total of 240 hours (120 hours when not designated a needy state) of job search and job readiness assistance in the preceding 12 month period for single custodial parents with a child under age six and no more than 360 hours (180 hours when not designated a needy state) for all other work eligible individuals, of which no more than four consecutive weeks can be reported in accordance with the final rule.

Monitoring of the needy state criteria posted at http://www.acf.hhs.gov/programs/ofa/resource/12wks-qualifiers is done on a quarterly basis (prior to transmission of data) to ensure Oregon continues to qualify for the six-week extension. Updates to this site lag a quarter behind the reporting cycle. Oregon will monitor the site and re-submit months/quarters as necessary.
should the designation change from a needy state to a non-needy state.

Limit of hours within the preceding 12-month period:

For all clients on the case, lookup the corresponding 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 noted below (if a ‘Hours of Attendance’ table is not found for that client, a new record is inserted). 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 limit within the preceding 12-month period. Once the limit of 240 hours (120 hours when not designated a needy state) of job search and job readiness assistance in the preceding 12 month period for single custodial parents with a child under age six and no more than 360 hours (180 hours when not designated a needy state) for all other work eligible individuals is reached within the preceding 12 month period then additional hours are ignored and not reported. The output file created in this process is used in the TANF Reporting process, where matching on case and client obtains the corresponding count of hours of attendance a client participated. Specific Job Search and Job Readiness Activity Codes included in this selection process are DA, JO, LS, MH, and RA and are selected only if they have hours posted to them. The clients Jobs Activity date range is checked to assure it falls within the specified week being accumulated. It should be noted that all cases and clients, 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
client. 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 and will code the job search and job readiness hours as zero for the week.

F. Community Service Programs

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

The definition of Oregon's community service program is unpaid work involving structured activities that improves the employability of the participant and where 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. Placements can be made at federal, state, and local government agencies, libraries, hospitals, educational organizations, agencies or businesses providing services to the needy, disabled, or senior citizens, police, fire, or medical providers, museums, public transportation services, domestic violence agencies, animal control organizations, and the chamber of commerce.
If required, training activities can be embedded or integrated with the client's participation in community service programs. Training must be determined to be needed to support the client's participation in community service programs. Training may consist of soft skills training such as developing good work habits and appropriate work behavior, job shadowing, or skills training related to the duties of the job.

Oregon's JOBS tracking and data (TRACS) entry activity code for the community service program is: CP - community service program.

Prior to enrollment in any activity, local program staff gather information to identify a client's strengths, interests, family circumstances, education, employment history, involvement with other social agencies, support services needed, and, if appropriate, drug and alcohol, mental health, and/or learning needs assessments. The State approved Family Assessment tool, is used to gather this information and is required to be completed for all mandatory TANF clients. This assessment process will help match the client and the appropriate service.

A case plan, also known as a personal development plan (PDP) is completed on all JOBS program clients. This plan is a written outline, developed by the client and the DHS case manager, with input from partners as appropriate. The case plan lists all the activities and goals for the client, including start and end dates, scheduled activity hours, and client and DHS responsibilities. A copy is provided to the client and a copy is maintained in the client's file.

Staff have been instructed to use this code as follows:

**CP - community service program:** an activity that involves structured work to improve the employability of the participant and performed for the direct benefit of the community.
The working conditions for clients participating in community service program must not violate applicable state and federal health and safety standards or require activities not considered usual and customary in the occupation for which the participant is being trained.

Clients participating in the community service program are covered by a State workers' compensation policy.

2. 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.

Countable hours for the community service program are based on employer issued reports indicating hours worked or contractor attendance reports.

3. 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 every two weeks. Hours will be documented with one of the following items:
- time cards, sign-in/sign-out sheets,
- rosters, other employer documents with recorded hours of work,
• contractor reporting,
• Attendance reports from the worksite.

The guidelines for attendance documentation are:
• All attendance documentation must be maintained in the client's case file or narrated in the TRACS case file.
• All community service program attendance documents should include: the participant's name; actual hours of work and/or training; name of the employer and/or training provider; and name and phone number of the person verifying hours.
• Attendance recorded in TRACS must be actual hours of participation, not scheduled hours or based on exceptional reporting (assuming participation is occurring unless notified otherwise).
• Attendance recorded in TRACS must be documented based on the items listed above.
• Participation in activities must be supervised and documented.

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

Oregon will require daily supervision of all unpaid work activities. This policy will be explained to all work sites. Work sites must agree to provide daily supervision to all TANF clients.

Although supervision may not involve daily contact, daily supervision does include the daily assignment of tasks or duties, oversight of the client’s participation, and access to a Case Manager or a partner staff member. Assignment of tasks or duties will be provided by the work site supervisor, partner staff, or in writing by the Case Manager via a Personal Development Plan.
5. **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.

To calculate the maximum number an individual can be required to participate in an unpaid JOBS work activity (work experience, sheltered work, and community service) Oregon will use the formula described in Section I – Determining Countable hours for Work Experience (2).

6. **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 and where 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.
G. Vocational Education Training

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

Vocational Training is enrollment in an organized educational or distance learning program that is directly related to the preparation for employment in current or emerging occupations. Distance learning programs will be approved as appropriate and monitored by the Case Manager or partner staff. Due to current budget constraints this activity is used in a limited basis.

Oregon's JOBS tracking and data (TRACS) entry activity codes for vocational training are 1) VT – vocational training, 2) PS - parents as scholars, and 3) SI – Self-Initiated Training.

Prior to enrollment in any activity, local program staff gather information to identify a client's strengths, interests, family circumstances, education, employment history, involvement with other social agencies, support services needed, and, if appropriate, drug and alcohol, mental health, and/or learning needs assessments. The State approved Family Assessment tool, is used to gather this information and is required to be completed for all mandatory TANF clients. This assessment process will help match the client and the appropriate service.

A case plan, also known as a personal development plan (PDP) is completed on all JOBS program clients. This plan is a written outline, developed by the client and the DHS case manager, with input from partners as appropriate. The case plan lists all the activities and goals for the client, including start and end dates, scheduled activity hours, and client and DHS responsibilities. A copy is provided to the client and a copy is maintained in the client’s file.
Staff have been instructed to use the following code:

VT – vocational training: An activity in which participants are enrolled in a two or four-year program, earning credit toward a college degree.

PS - parents as scholars: an activity of the JOBS program intended to provide support to JOBS participants who are beginning or completing a two- or four-year degree program at an approved school.

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

Vocational training is limited to adults who have a demonstrated need and ability for training to become self-sufficient, be related to occupations with an appropriate wage level and opportunity for employment and should be geared toward providing a career path.

To determine if a client has a demonstrated need for vocational training, staff consider the employability of the client, previous educational, training, and past participation of the client, and employment needs of the local labor market.

Vocational education must be provided by education or training organizations, such vocational technical schools, community colleges, colleges or universities, and proprietary schools.
2. 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.

Countable hours for vocational training are based on school attendance records, educational provider issued reports indicating hours attended, state approved education attendance form, or contractor attendance reports.

3. 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 every two weeks. Hours will be documented with one of the following items:

- school attendance records
- educational provider reporting
- state approved education attendance form

The guidelines for attendance documentation are:

- All attendance documentation must be maintained in the client's case file or narrated in the TRACS case file.
• Attendance will be documented with third party reporting, such as from contractors, employers, service providers, or others who can attest to the client’s attendance
• State approved education attendance form will be used as follows:
  • participants will be required to have an instructor (or other school official knowledgeable of school attendance) sign that he/she attended classes;
  • Hours must be reported on at least a weekly basis and turned into a designated DHS or contractor staff.
• All vocational training attendance documents should include: the participant's name; actual hours of participation; name of the educational provider; and name and phone number of the person verifying hours.
• One hour of unsupervised homework will be allowed for one hour of documented class time. Additional supervised homework attendance will be documented as follows:
  • Study hall, study skills, or study group activities, if supervised by a DHS, contractor or school staff, volunteer, or official. Participants will be required to have the staff person verify that he/she attended the study session.
  • Completion of instructor assigned homework as verified on a state approved education attendance form by the instructor (or other school staff, volunteer, or official). Hours must be reported on at least a weekly basis and turned in to a designated DHS or contractor staff.
• Distance learning for on-line coursework must be documented, verified, and supervised in the same manner as other educational activities, however, school produced computer print outs indicating elapsed time of course and homework will be acceptable. Where elapsed time is not available to determine attendance hours the State will use
approved curricula with fixed number of hours for each assignment based on the extent the learner engaged in, or completed, the assignment. If a fixed number of hours of credit is determined for a learner to pass a test or complete a lesson, the state may use verification of passing a test or lesson as documentation of those hours.

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

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

Oregon will require daily supervision of all unpaid work activities. This policy will be explained to all educational providers. Educational providers must agree to provide daily supervision to all TANF clients.

Although supervision may not involve daily contact, daily supervision does include the daily assignment of tasks or duties, oversight of the client’s participation, and access to a Case Manager 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 Case Manager via a Personal Development Plan.

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

6. **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.**

Allowable activities for Vocational Education Training include work focused general education and language instruction as part of vocational education program. The Family Coach or contractor staff will be responsible for determining that the client's vocational educational training plan only includes remedial educational 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 English as a Second Language are required pre-requisites for this client to complete their vocational educational training.

**H. Job Skills Training Directly Related to Employment**

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

The definition of Oregon's job skills training is training, education, or distance learning directly related to employment for job skills required by an employer to provide an individual with the ability to obtain employment or to advance or adapt to changing demands of the workplace. Distance learning programs will be approved
as appropriate and monitored by the Case Manager or partner staff.

Oregon’s JOBS tracking and data entry (TRACS) activity code for Job Skills Training Directly Related to Employment is: JS – job skills training.

Prior to enrollment in any activity, local program staff gather information to identify a client’s strengths, interests, family circumstances, education, employment history, involvement with other social agencies, support services needed, and, if appropriate, drug and alcohol, mental health, and/or learning needs assessments. The State approved *Family Assessment tool*, is used to gather this information and is required to be completed for all mandatory TANF clients. This assessment process will help match the client to the appropriate services.

A case plan, also known as a personal development plan (PDP) is completed on all JOBS program clients. This plan is a written outline, developed by the client and the DHS case manager, with input from partners as appropriate. The case plan lists all the activities and goals for the client, including start and end dates, scheduled activity hours, and client and DHS responsibilities. A copy is provided to the client and a copy is maintained in the client’s file.

Staff have been instructed to use this code as follows:

**JS – job skills training:** an activity in the basic education component in which unpaid training required by an employer is needed to gain the skills necessary to be hired, retained or advance in employment.

2. 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. Attendance includes work focused general education and language instruction as part of the job skills training program. Excused absences and holidays are determined using the method described in Section II – Hours Engaged in Work.

Countable hours for job skills training are based on school attendance records, educational provider issued reports indicating hours attended, state approved education attendance form, or contractor attendance reports.

3. 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 every two weeks. Hours will be documented with one of the following items:

- school attendance records
- educational provider reporting
- state approved education attendance form

The guidelines for attendance documentation are:

- All attendance documentation must be maintained in the client's case file or narrated in the TRACS case file.
- 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 client's attendance. Job search contacts will be documented by the client using a statewide job search log (including the DHS Form 475) which will contain the following information: 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 client and submitted to DHS or appropriate Contractor for verification and approval.

- State approved education attendance form will be used as follows:
  - participants will be required to have an instructor (or other school official knowledgeable of school attendance) sign that he/she attended classes;
  - hours must be reported on at least a weekly basis and turned into a designated DHS or contractor staff.

- All job skills training attendance documents should include: the participant's name; actual hours of participation; name of the educational provider; and name and phone number of the person verifying hours.

- One hour of unsupervised homework will be allowed for one hour of documented class time. Additional supervised homework attendance will be documented as follows:
  - Study hall, study skills, or study group activities, if supervised by a DHS, contractor or school staff, volunteer, or official. Participants will be required to have the staff person verify that he/she attended the study session.
  - Completion of instructor assigned homework as verified on a state approved education attendance form by the instructor (or other school staff, volunteer, or official).
  - Hours must be reported on at least a weekly basis and turned in to a designated DHS or contractor staff.

- Attendance recorded in TRACS must be actual hours of participation, not scheduled hours or based on exceptional reporting (assuming participation is occurring unless notified otherwise).
• Distance learning on on-line coursework must be documented, verified, and supervised in the same manner as other educational activities, however, school produced computer printouts indicating course and homework will be acceptable.
• Attendance recorded in TRACS must be documented based on the items listed above.
• Participation in activities must be supervised and documented.

4. **Describe the methods of daily supervision for unpaid work activities.**

Oregon will require daily supervision of all unpaid work activities. This policy will be explained to all education providers. Educational providers must agree to provide daily supervision to all TANF clients.

Although supervision may not involve daily contact, daily supervision does include the daily assignment of tasks or duties, oversight of the client’s participation, and access to a Case Manager 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 Case Manager via a Personal Development Plan.

I. **Education Related to Employment**

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

The definition of Oregon's education directly related to employment activities is basic education, such as Adult Basic Education, or language instruction, such as English as a Second Language, for individuals without a high
school diploma or GED instruction or testing that is related to a specific occupation, job, or job offer.

Education directly related to employment activities includes distance learning. Distance learning programs will be approved as appropriate and monitored by the Case Manager or contractor staff Oregon's JOBS tracking and data (TRACS) entry activity codes for Education Directly Related to Employment are: AB - adult basic education and ES - English as a second language.

Prior to enrollment in any activity, local program staff gather information to identify a client's strengths, interests, family circumstances, education, employment history, involvement with other social agencies, support services needed, and, if appropriate, drug and alcohol, mental health, and/or learning needs assessments. The State approved, *Family Assessment tool*, is used to gather this information and is required to be completed for all mandatory TANF clients. This assessment process will help match the client and the appropriate service.

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

Staff have been instructed to use the following code:

**AB - adult basic education**: an activity intended to ensure functional literacy for all JOBS clients.

**ES - English as a second language**: language instruction designed to provide individuals with the necessary English skills needed to succeed in the workplace.
2. 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, 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. 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.

Countable hours for education directly related to employment are based on school attendance records, educational provider issued reports indicating hours attended, state approved education attendance form or contractor attendance reports. Basic education and ESL will count as a core activity if they are a necessary and regular part of a work activity.

3. 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 every two weeks. Hours will be documented with one of the following items:

- school attendance records
- educational provider reporting
• state approved education attendance form

The guidelines for attendance documentation are:
• All attendance documentation must be maintained in the client's case file or narrated in the TRACS case file.
• Attendance will be documented with third party reporting, such as from contractors, employers, service providers, or others who can attest to the client's attendance.
• State approved education attendance form will be used as follows:
  • participants will be required to have an instructor (or other school official knowledgeable of school attendance) sign that he/she attended classes;
  • Hours must be reported on at least a weekly basis and turned into a designated DHS or contractor staff.
  • All education directly related to employment attendance documents should include: the participant's name; actual hours of participation; name of the educational provider; and name and phone number of the person verifying hours.
  • One hour of unsupervised homework will be allowed for one hour of documented class time. Additional supervised homework attendance will be documented as follows:
    • Study hall, study skills, or study group activities, if supervised by a DHS, contactor or school staff, volunteer, or official. Participants will be required to have the staff person verify that he/she attended the study session.
    • Completion of instructor assigned homework as verified on a state approved education attendance form by the instructor (or other school staff, volunteer, or official). Hours must be reported on at least a weekly basis and turned in to a designated DHS or contractor staff.
Distance learning for on-line coursework must be documented, verified, and supervised in the same manner as other educational activities, however, school produced computer printouts indicating elapsed time of course and homework will be acceptable. Where elapsed time is not available to determine attendance hours the State will use approved curricula with fixed number of hours for each assignment based on the extent the learner engaged in, or completed, the assignment. If a fixed number of hours of credit is determined for a learner to pass a test or complete a lesson, the state may use verification of passing a test or lesson as documentation of those hours.

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

J. Secondary School or GED Attendance

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

The definition of Oregon's satisfactory school attendance activities is regular attendance at a secondary school or in a course of study, including distance learning, leading to a GED for individuals who have not completed high school or obtained a GED. Distance learning programs will be approved as appropriate and monitored by the Family Coach or partner staff.
Oregon’s JOBS tracking and data (TRACS) entry activity code for Satisfactory School Attendance is: HS - high school or GED enrollment.

Prior to enrollment in any activity, local program staff gather information to identify a client's strengths, interests, family circumstances, education, employment history, involvement with other social agencies, support services needed, and, if appropriate, drug and alcohol, mental health, and/or learning needs assessments. The State approved, *Family Assessment tool*, is used to gather this information and is required to be completed for all mandatory TANF clients. This assessment process will help match the client and the appropriate service.

A case plan, also known as a personal development plan (PDP) is completed on all JOBS program clients. This plan is a written outline, developed by the client and the DHS case manager, with input from partners as appropriate. The case plan lists all the activities and goals for the client, including start and end dates, scheduled activity hours, and client and DHS responsibilities. A copy is provided to the client and a copy is maintained in the client's file.

2. **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, 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. 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.

Countable hours for satisfactory school attendance are based on school attendance records, educational provider issued reports indicating hours attended, a state approved education attendance form, or contractor attendance reports.

3. 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 every two weeks. Hours will be documented with one of the following items:

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

The guidelines for attendance documentation are:

- All attendance documentation must be maintained in the client’s case file or narrated in the TRACS case file.
- Attendance will be documented with third party reporting, such as from contractors, employers, service providers, or others who can attest to the client’s attendance.
- State approved education attendance form will be used as follows:
- participants will be required to have an instructor (or other school official knowledgeable of school attendance) sign that he/she attended classes;
- Hours must be reported on at least a weekly basis and turned into a designated DHS or contractor staff.
• All satisfactory school attendance documents should include: the participant's name; actual hours of participation; name of the educational provider; and name and phone number of the person verifying hours.

• One hour of unsupervised homework will be allowed for one hour of documented class time. Additional supervised homework attendance will be documented as follows:

• Study hall, study skills, or study group activities, if supervised by a DHS, contactor or school staff, volunteer, or official. Participants will be required to have the staff person verify that he/she attended the study session.

• Completion of instructor assigned homework as verified on a state approved education attendance form by the instructor (or other school staff, volunteer, or official). Hours must be reported on at least a weekly basis and turned in to a designated DHS or contractor staff.

• Distance learning for on-line coursework must be documented, verified, and supervised in the same manner as other educational activities, however, school produced computer printouts indicating elapsed time of course and homework will be acceptable. Where elapsed time is not available to determine attendance hours the State will use approved curricula with fixed number of hours for each assignment based on the extent the learner engaged in, or completed, the assignment. If a fixed number of hours of credit is determined for a learner to pass a test or complete a lesson, the state may use verification of passing a test or lesson as documentation of those hours.

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

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

Oregon will require daily supervision of all unpaid work activities. This policy will be explained to all educational providers. Educational providers must agree to provide daily supervision to all TANF clients.

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

5. **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 weekly by the case manager. 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.

K. Providing Child Care Services to an Individual Who is Participating in a Community Service Program

1. 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

A. 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 DHS rule 461-130-0327.
DHS rule 461-130-0327(3) is as follows:

A client is excused for good cause from a failure to comply with a requirement of an employment program, including an activity in a case plan (both terms defined in OAR 461-001-0025) in the following circumstances:

- Participation in a required activity in a case plan would have an adverse effect on or risk to the client's physical or mental health or would expose the client to increased risk of domestic violence (see OAR 461-001-0000).
- Except in the SNAP program, participation is likely to cause undue hardship for the dependent child (see OAR 461-001-0000) or the client.
- Appropriate child care, or day care for an individual in the household who has a disability (see OAR 461-001-0000 and 461001-0015 as applicable) that substantially reduces or eliminates the individual's ability to care for himself or herself, cannot be obtained. "Appropriate child care" means that--
  - Both the provider and the place where care is provided meet health, safety, and provider requirements as required in OAR 461-165-0180;
  - The care accommodates the parent's work schedule; and
  - The care meets the specific needs of the dependent child, such as age and special-needs requirements.
- Child care, or day care for an individual’s in the household group who has a disability that substantially reduces or eliminates the individual’s ability to care for themselves:
  - Cannot be obtained within a reasonable distance. “Reasonable distance” means that a parent’s total travel from home to the child care provider and the workplace or JOBS activity will be no more than one hour either way unless a longer commute time is customary in the community.
• The work attachment position or employment offered is vacant due to a strike, lockout, or other labor dispute.
• The work attachment position or employment requires the client to join a union, and the client has religious objections to unions.
• The client belongs to a union and the employment violates the conditions of the client's membership in the union.
• The wage for the client's current or potential job is:
  o Less than applicable minimum wage; or
  o If minimum wage laws do not apply, the wage (rate for piece work) is less than that normally paid for similar work.
• The client's prospective employer engages in employment practices that are illegally discriminatory on the basis of age, sex, race, religious or political belief, marital status, disability, sexual orientation, or ethnic origin.
• The client's participation in a required activity in a case plan would prevent or interfere with the client's participation in an activity of the Grande Ronde Tribe's NEW program.
• The client's failure to participate is due to a circumstance beyond his or her reasonable control.
• When the failure to comply is caused by an aspect of the client's disability, including the Department's failure to provide a reasonable accommodation.
• The client quits a job to accept another job with a monthly income at least equal to the monthly income of the first job.
• The Department determines there are no appropriate activities or necessary support services (see OAR 461-001-0025) to support an activity (see OAR 461-001-0025) in order for the client to participate.

B. Holidays

Holidays should be recorded as attendance time if the holiday is observed on a day of scheduled participation. Record the normal number of hours the client 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
• July 4th
• 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). The TRACS system records, by JOBS activity and client, expected hours, actual attendance hours, excused hours, and holiday hours. Regular attendance, excused absences and holidays will be recorded separately, and the data entry field will include an edit to prevent staff from recording more combined hours of: actual attendance, excused hours and holiday hours than expected hours for the activity.
C. FLSA Deeming

The JOBS Activity Guidelines provides instructions to the field to determine the maximum number of unpaid work hours allowed for unpaid work or work experience and/or community service participation. The Case Manager 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:

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

The State of Oregon will deem up to the appropriate 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 clients worked the total hours allowed in the equation above. The State system identifies a "deemable" client, determines the maximum number of FLSA hours, and deems up those clients who participate the required number of FLSA hours. Under the FLSA calculation, if a client participates the maximum number of hours allowed, they will be "deemed up" to the full required monthly core 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

A. Procedures for Identifying all Work Eligible Individuals

1. Describe the procedures for identifying all work eligible individuals.

Work eligible individuals are identified by a number of 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, unless excluded (see below): the eligibility system has an indicator of the person's status on the case. The person must have an indicator showing 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.

Their age is checked: Date of Birth is recorded in the eligibility systems. Edits require a 'JOBS status' indicator for all TANF recipients (as described above) between the ages of 16 and 60. Internal controls prevent update of the case without this data item.

Their status as a custodial parent of a minor child is checked: 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.

Exclusions for non-recipient parents are:

- minor parent who is not the head-of-the-household,
Family Identifiers indicate that a person is or is not head of household. The age is checked to determine if they are a minor, parentage is verified using Mom and Dad identifiers. If the minor parent is not head-of-household (HOH) they are excluded.

- a non-citizen parent who is ineligible for TANF due to immigration status,

Person Identifiers indicate if the individual is a recipient, if the parent is not a recipient a variety of factors are checked. If the citizenship factor indicates nonqualified non-citizen status, the parent is excluded.

- SSI parent

Person Identifiers indicate if the individual is a recipient, if the parent is not a recipient a variety of factors are checked. If the SSI indicator is present, unless the parent is meeting participation requirements, the parent is excluded.

Exclusions for recipient parents are:

- SSDI parents

If the SSDI indicator is present, unless the parent is meeting participation requirements, the parent is excluded.

- Caring for a family member with a disability.

There is an Exclusion code entered by the worker that indicates the parent is needed at home to care for a disabled family member and provided the required documentation.
2. 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 Federal definition.

Data input into the automated system is controlled by edits and audits that prevent many data entry errors. System updates made by workers are not permitted 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 child care and transportation will not be issued by the system unless certain data elements are entered accurately and timely.

For child care payments there are several conditions that must be met before vouchers can be issued either automatically or by the worker. There must be an open, qualifying activity, the attendance must be current, and children must be a certain age. Special needs children may receive child care through a higher age range. This variety of controls helps ensure the accuracy of data entry.

Attendance hours are normally tracked by contractor or work site staff that are responsible for the work activities. These hours are reviewed by DHS 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 DHS staff receive the JOBS Activity Guidelines and are trained on proper coding, appropriate attendance activities, and documentation.
The automated system stores these hours and logic in the program determines the final calculation to be used in the Federal Report.

All activity hours are identified as either federally qualifying or not federally qualifying. Logic in the program 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 so they are not included with reportable work activities and hours.

B. Documentation for Work-Eligible Individuals

1. Describe the State’s procedures for identifying all work-eligible individuals, as defined at § 261.2. This should include the procedures needed to identify a non-recipient parent excluded from the definition of work-eligible individual. These are:
   - A minor parent who is not the head-of-household and not spouse of the head-of-household;
   - An alien who is ineligible for assistance due to his or her immigration status; and
   - At State option, on a case-by-case basis a recipient of Supplemental Security Income (SSI) benefits.

The State should also describe its procedures for identifying a parent caring for a disabled family member, who may also be excluded from the definition of a work-eligible individual. The procedures should define the terms "disabled," "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 used to make such determinations. If the
State includes in this group parents caring for a family member with a temporary disability, the State must describe the procedures for determining when the family member is no longer disabled and ensuring that the parent is then identified as a work-eligible individual.

Minor parent who is not head-of-household (or spouse of head-of-household) are identified and excluded based on their status on 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.

Logic in the program 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, logic in the program excludes the minor parent from the report. Using the same programming 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 a status indicating if they are a recipient or not. Once identified as a non-recipient, the Citizenship value confirms the reason they should be excluded from work eligible status.

SSI recipients are identified first by their status on the case as mentioned above. This first step shows they are non-recipients. To determine why they are a nonrecipient, logic in the program 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 first by their status on the case as mentioned above. This first step shows they are recipients. To determine whether they are excluded recipients, logic in the program 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 disabled family member is identified by an exclusion value in the eligibility system. Staff verifies, by medical documentation from a qualified medical professional, the need for parent to remain in the home to care for the disabled family member. After determining that the individual is needed at home to provide care, they enter a value indicating 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.

2. Describe verification procedures for ensuring the accuracy in reporting of work-eligible individuals on the TANF Data Report and the SSP-MOE Data Report, including:
   - The correct reporting of the Work Participation Status of all 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.

Work eligible status is determined by several factors in the eligibility system. Edits and audits control data entry and prevent potential coding errors.
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.

Valid in-grant values included in the benefits are:
- **AD** - Adult included in the TANF or SSP-MOE benefit group. Edits require AD to be 18 years of age or greater with an exception for minor head of household. Persons under 19 years of age cannot be AD unless they have a case payee (head of household) indicator. Edits cannot be bypassed.
- **CH** - Child in TANF or SSP-MOE benefit group. Edits require persons coded CH to be less than 19 years of age. Edits cannot be bypassed.

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.

Valid JOBS status values are:
- **W** - Work eligible mandatory
- **E** - Used for non-TANF cases
  - Exempt but volunteers
  - Exempt from JOBS, but required to participate in MH/DA S - State Funded TANF

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.

Valid Exempt reason values are:
- **N** - Needed to care for a disabled household member
- **V** - VISTA volunteer
- **P** - Pregnant in 9th month or newborn up to the state of Oregon’s exemption period for single parent (16 weeks for parents under 20)
• M - Medical complications due to pregnancy
• U - Undue hardship prevents participation

The JOBS participation tracking system records activities and hours of attendance using 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 verification and projected forward to anticipate weekly attendance for a maximum of six months as described in section I.1.5. An end date is placed on 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.

Once an individual is defined as work eligible, the hours in federal fields (FF) 50-61 are reviewed. The hierarchy of determination for work participation is:

• WEI who meets the federal participation rate requirements.
• WEI that are disregarded from the participation rate. These are cases that are excluded from the participation rate numerator and denominator.
• WEI that are exempt, meaning that the state is not requiring them to participate but they are still included in the participation rate calculation.
• WEI Cases that are not disregarded or exempt and are not meeting the participation rate requirements.

The following selection criteria are used to determine, validate and assign the appropriate work participation status:
Work Participation Status equals:

- "19" Participating:

  If FF 12='1', Search FFs 50-57, If 20 or more hours are recorded in those fields, then search fields 58-61. If combined hours are equal to or greater than 30 hours, then '19'. To meet the requirements of segment '19' of this part, the first 20 hours of participation MUST come from FF50-57. Additional combined hours must equal at least 30 or more hours and can come from fields 50-61.

  If FF12='2' and FF22= '0', combined hours of both WEI individuals must equal 35 hours from fields 50-61. The first 30 hours of the 35 hours must be from fields 50-57. Additional combined hours up to or greater than 35 may be derived from FF50-61. If that condition is met, then '19'.

  If FF12=2 and if FF22(A) >0 and no child is coded as receiving SSI, then the total combined hours must be equal to or greater than 55. Of those, 50 hours must come from hours listed in fields 50-57. Other hours up to or exceeding 55 may come from fields 50-61. If those conditions met, then '19'.

- "15" (Full participation of teens in education):

  If not '19', if FF 12= '1' or '2' and parent under age 20 (married or unmarried and head-of-HH) and =>1 hour of attendance in FF60 and no disqualification code in current month, then '15'.

- "16" (Full engagement of teens in education directly related to employment):

  If not '19' or'15', and if FF12='1' or '2' and parent under age 20 and FF59 is equal to or greater than 20, then '16'.

- "01" (Disregarded due to child under age 1)
If not ‘19’, ‘15’, ‘16’ or ‘17’, and if FF12 = ‘1’ and no other parent and any child under age 12 months on the case, then ‘01’.

- “02” (Disregarded due to disqualification)

If not ‘19’, ‘15’, 16’, ‘17’, or ‘01’, and has a disqualification in current month and has disqualifications in 3 or less months of the last 12 months, then ‘02’.

- “17” (Single custodial parents with child under age 6):

If not '19', '15' or '16', and if FF12='1' and no other parent and any child under age 6 on the case, and hours in FF 50-57 & 61 >= 20, then ‘17’.

- “09” (Exempt due to domestic violence):

If not '19', '15', '16', '17', '01' or '02', and any of the following are true, then ‘09’.

Coded with an identifier on the eligibility system that indicates eligibility for benefits in the Domestic Violence (DV) Survivors program for the report month or two prior months;

Open DV JOBS activity in report month;

Open participation period in report month in which certain eligibility factors were waived due to DV;

A payment identified on the accounting system as being paid to support survivors fleeing DV in report month.

- “07” (Exempt due to disability):

If not '19', '15', '16', '17', '01', '02', or '09' and the person has an identifier indicating incapacity on the eligibility
system or an open JOBS activity indicating participation in an activity involving the SSI application process in the report month or has a verified disability on the disability tracking system, then '07'.

- “08” (Exempt due to care for a disabled child):

  If not '19', '15', '16', '17', '01', '02', '09' or '07', and at least one child is receiving SSI or has a verified disability on the disability tracking system, then 08.

- “12” (Exempt due to disqualification):

  If not '19', '15', '16', '17', '01', '02', '09', '07', or '08' and has a disqualification in current month and current month is fourth or greater month in previous 12 months with disqualification then '12'.

- “14” (No hours of attendance):

  If not '19', '15', '16', '17', '01', '02', '09', '07', '08' or '12' and 0 hours of attendance are recorded in FF 50-61, then '14'.

- “18” (Not enough hours of participation):

  If not '19', '15', '16', '17', '01', '02', '09', '07', '08', '12', or '14', and hours >0 entered in FF 50-61, then '18'.

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 whether the family will be used to calculate the all families work participation rates or will not be used to calculate work participation rate in accordance with Federal Field 12.
Regular review of the report criteria occurs by Business, Policy, and Research Analysts jointly with programming staff running 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.

3. Describe the procedures that show how the State ensures that, for each work-eligible individual, it accurately inputs data into the automated data processing system, properly tracks the hours, and accurately reports countable hours to HHS that do not include participation in an activity that does not meet a Federal Definition.

As mentioned, 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 child care 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 normally tracked by contractor or work site staff that are responsible for the work activities. These hours are reviewed by DHS 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 DHS staff receive the JOBS Activity Guidelines and are trained on proper coding, appropriate attendance activities, and documentation.

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

All activity hours are identified as either federally qualifying or not federally qualifying. Logic in the program 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 so they are not included with reportable work activities and hours.

Data inputted by DHS and Contractor staff will be reviewed by a sampling of actual cases. The purpose of the sampling review will be to ensure:

- Staff is inputting attendance hours, documenting attendance and recording activities in accordance with the JOBS Activity Guidelines.
- Staff is following appropriate procedures for excused absences, holidays, maximum number of unpaid work hours allowed, and projecting actual hours of paid employment.
- Staff is following appropriate procedures for the minimum frequency of attendance reporting and certifying supervision requirements.
- Verification procedures are working properly, and
- Staff is correctly inputting case characteristics for the TANF Data Report such as receipt of child care, 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.

The following procedures will be in place by September 30, 2007, however they may change as we make improvements in the future. Oregon will submit an amended Work Participation Verification Plan as changes are completed.

A. Process for Internal Controls

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

Policy Directives

Oregon developed a "JOBS Activity Guidelines" (JAG) to be used by TANF JOBS Program and contractor staff. These guidelines were issued to field staff to:

- describe the purpose of each activity,
- provide consistent definitions of activities, including appropriate and inappropriate assignments for each activity, and
- outline acceptable documentation of attendance for participation.

The JAG has been revised to reflect the new requirements of the Final Rules on the Reauthorization of
TANF. The guidelines have been expanded to provide additional information, including:

- definition of allowable activities and mandatory clients,
- acceptable attendance documentation, and
- definitions and clarification of important terms.

The JAG is the basis for training provided to State field managers, case managers, contractors, and other providers of JOBS services in Oregon. The guidelines will serve as the State's expectations for field operation and staff is referred to the instructions provided in the guidelines.

Staff Training - Preliminary Site Training and Review

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

Quality Assurance

Data inputted by DHS and Contractor staff will be reviewed by a sampling of actual cases (see section 4 below). The purpose of the sampling review will be to ensure:

- staff is inputting attendance hours, documenting attendance, and recording activities in accordance with the JAG,
- staff is following appropriate procedures for excused absences, holidays, maximum number of unpaid
work hours allowed, and projecting actual hours for paid employment,

- staff is following appropriate procedures for the minimum frequency of attendance reporting and certifying supervision requirements,
- verification procedures are working properly, and
- staff is correctly inputting case characteristics for the TANF and SSP-MOE Data Report such as receipt of child care, 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:

- ensure field compliance with Federal participation requirements including case characteristics for the TANF and SSP-MOE Data Report such as receipt of child care, age of child, age of adult or teen parent, satisfactory school attendance, and families with a disabled family member;
- validate the accuracy of data reported including the examination of documentation for reported hours, review verification procedures to ensure compliance, and
- ensure that DHS and contractor staff are adhering to Federal regulations to document, count and report hours of participation.

Individual cases identified as having 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 also be used to determine whether providers are meeting contractual supervision and documentation requirements and providing accurate and timely reporting of actual hours of participation each month in the Transition Referral and Client Self-Sufficiency (TRACS) system.

2. **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.

Case Managers, management and contractor staff utilize three main tools to review, manage, and track clients’ participation and progress. These are:

- **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.
- **Monthly Participation Detail**: Branch offices and partner staff are provided with detail monthly reports regarding which clients are counted towards the participation Score Card report.
- **Snapshot Report**: Branch offices and partner staff are provided a weekly or biweekly picture (snapshot) of what activities a client is participating in, what clients are not meeting their participation plan requirements and client 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.

3. **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.**

Score Card and monthly participation reports, which are manually calculated monthly participation rates for work-eligible individuals, are compared to the result that the state actually reports to HHS to help identify programming errors for corrective action.

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 used for the TANF or SSP-MOE Data Reports is monitored monthly to ensure integrity of data. 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 integrity of the system.

4. **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:

- JOBS activity attendance documentation is appropriate and in accordance with the JOBS Activity Guidelines (JAG).
- 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.
- Self-employment participation hours are equal to gross income less business expenses divided by the Federal minimum wage.
- Unsubsidized employment projected actual hours are calculated correctly.
- JOBS activities are performed in accordance with the definition established in the JAG and Federal regulations.
- Follow-up action was taken on non-attendance.

Findings

- 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.
- The District will be required to report back, within 60 days, action taken to correct audit citations.
- 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

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

- Reporting Month
- Stratum
- Case Number
- Disposition
- Type of Family for Work Participation
- Amount of Food Stamps Assistance
- Receives Subsidized Child Care
- Amounts of TANF (and SSP-MOE) Assistance
- Family Affiliation Code
- Noncustodial Parent Indicator
- Date of Birth (Adult)
- Relationship to Head-of-Household
- Parent with Minor Child
- Work-Eligible Individual Indicator
- Date of Birth (Child)

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

A. Documentation for Verification of Other Data
1. For each of the above 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. First, the programming tests the parent status of any adults using parent indicators on the case record. Edits in the eligibility system require parent indicators for all persons under age 19. Two parents are required for each child; the parent may be coded as Mom, Dad, or absent. There are also exception values for exceptional situations (e.g. single parent adoption). The case record cannot be updated unless all children have both parent indicators and the values are correct. 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 child care 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 Client 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 (Adult): The programmed code uses DOB entered on the eligibility system. Otherwise, if FF30 = ‘1’ then DOB ‘00000000’. If FF 30 > ‘1’ then ‘99999999’.

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) then they are a parent. 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) then they are a parent. 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 ‘99999999’.
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.

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

TANF Requirements Workgroup meets to review the programming logic as it 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 person 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.

B. Work Participation Status

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

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.

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

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'

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

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: Unsubsidized Employment;
- Subsidized Private-Sector Employment;
- Subsidized Public-Sector Employment;
- Work Experience;
- On-the-Job Training;
- Job Search and Job Readiness Assistance (which also checks the hour counter table);
- Job Skills Training Directly Related to Employment:
- Education Directly Related to Employment for Individuals with no High School Diploma or
- Certificate of High School Equivalency; or
- Satisfactory School Attendance for Individual with No High School Diploma or Certificate of High School Equivalency.

If hours in the above activities total more than or equal to 20, then the family is deemed engaged in work based on 20 hours of participation in countable work activities for a single custodial parent or caretaker relative with a child under the age of six.
VI. Certification

This is to certify that Oregon's TANF Work Verification Plan dated October 1st, 2018 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 October 1st, 2018.

Belit Burke
Program Administrator
Self Sufficiency Program
Oregon Department of Human Services
Office of Self-Sufficiency Programs