In the Loop

Veteran Stand Down in The Dalles

On November 7, 2015 DHS Aging and People with Disabilities in The Dalles participated in the Mid-Columbia Veteran Stand Down event. Thirteen Service Providers were available to provide resource information to Veterans in our local service area. We had at least three attendees who came from the Salem area to attend. Over 40 Veterans attended the event and this was the first event of this kind in our local area.



This was a great turnout for a first event. There is a second event for Hood River County in the planning stages as well. The event was coordinated by Jen Borne with the Oregon State Employment Department, Disabled Veterans Outreach Specialist who did a tremendous job putting this all together. It was great to see all the Veterans who attended as well as talk with



each of them who came by our booth. We were able to offer some of our local veterans resources and information they had not been aware of.

Some of the providers in attendance included Social Security, Veterans Services, Red Cross, Community Action, Counseling Resources, Housing, Employment, Self Sufficiency a mobile medical and dental clinic, free haircuts, and a hot meal. Quite a few of the providers came from the Portland area to participate in this event which was wonderful to see.

Continued on the next page

In this edition:			
Veteran Stand Down in The Dalles	1	Payment schedule changed	6
Halloween in Roseburg!	2	December 2015 training schedule	7
ABAWD training	2	EDMS expansion	8
December 2015 calendar of events	2	December 2015 CBC payment schedule	9
Don't forget - OHP contact number	2	Familial housing rights	9
Self-employment income for SNAP	3	Don't forget - SNAP denials	10
Open enrollment for medical	3	HCBS regulations	10
October 2015 SNAP honor roll	4	More NVRA Q&A	11
Client-employer responsibilities	4	Long term services and supports	12
HCBS changes	5	innovator agents at work	
SNAP Civil Rights training	5	Privacy and security training reminder	12
Medical deduction for an attendant	6	Able-bodied adults without dependents	13

Supporting APD/AAA field structure by providing efficient, timely, and accurate information through superior customer service.

Continued from the previous page

There was also Military surplus and a free supply of clothing to those in need. Our local Representative John Huffman, Congressman Greg Walden and Wasco County Commissioner Rod Runyon were a few of the dignitaries that came to the local event.



Pearl - Nadja McConville, Clackamas

Carol Mauser, District 9 Manager

ABAWD training

A new online training is available for SNAP policy changes for Able Bodied Adults Without Dependents—ABAWDS (SS-AR-15-014). To view the training you will need to log onto the DHS Learning Center and search for the course titled *ABAWD* (CO5311).

Additional training will be available prior to the implementation January 1, 2016.

December 2015

AIDS awareness month
National tie month
Universal human rights month

Dec. 1 - 7: Cookie cutter week Dec.6 - 12: Older driver safety week Dec. 13 - 19: Gluten-free baking week

Dec. 25 - 31: It's about time.... week

Dec. 1: Giving Tuesday

Dec. 3: Day of persons with disabilities

Dec. 7: Pearl Harbor remembrance day

Dec. 15: Cat herder's day

Dec. 18: Ugly Christmas sweater day

Dec. 21: Winter solstice Dec 25: Christmas CLOSED

Dec. 31: New Year's Eve

Halloween in Roseburg!

Many thanks to Beth Elye for sending in these photos!

Happy Halloween! APD District 6 in Roseburg hosted our annual trick-ortreat with the Cobb Street Children's Learning Center as the characters from the Wizard of Oz. A great time was had by all!





Photo: Melody Lollar as Glinda the Good Witch; Beth Elye as a Munchkin (with a munchkin); Debi Boas as the Cowardly Lion; Jackie Paxton as the Wicked Witch of the East; Angie Schartner and Jamie Perry as the Scarecrow Twins; Kathy Bradfield as the Wicked Witch of the West; Dena Cardillo as Jessie from the Toy Storyl; Racheal Schartner as The Great and Powerful Oz (from Emerald City); and Kelly Schlayer as Dorothy.



Don't forget! When OHP applicants or customers call or stop by a AAA or APD office with questions about their OHP

medical coverage and you are not able to help them, please direct them to 1-800-699-9075.

Self-employment income for SNAP

Income verification for self-employed customers should always start with tax records. If the person has been in business for more than one year, and the last year's tax records are representative that is what should be used to determine income for the household.

If the customer does not have tax records, determine if they have enough information to annualize their income (ledgers or something similar for a year).

For individuals who have not been employed long enough use a period of time that is reasonable; this could be the last couple of months or whatever is determined to be reasonable.

For households that do not have their records, the policy unit developed a form: DHS 858, *Notice of Proof Needed for Self-Employment Income*. The DHS 858 gives the customer some guidelines about records which need to be kept to verify their income at the next certification. *Note:* It is important to narrate the customer was given the DHS 858 and to explain to the customer why they have received it.

At the next recertification, the customer is then required to provide records to verify their selfemployment income. The case can be denied if they do not have any records.

At Interim Change Report, if income was annualized at certification it should not be changed. If it wasn't annualized, determine the best income for anticipating their income; it will most likely be more than one month.

For self-employed cases, it is important to have good discussion with the customer about their business. Here are some questions to keep in mind when interviewing a self-employed customer:

- What type of business do you have?
- How long have you been in business?
- What type of records (such as taxes or ledgers) do you have?

SNAP Policy

Open enrollment for medical benefits

November 1, 2015 through January 31, 2016 is the open enrollment period for private health insurance. Open enrollment is <u>only</u> for private health insurance and does not affect Oregon Health Plan (OHP) or Medicare Savings Program recipients. This is not part of PEBB enrollment.

Any individuals who need to sign up, renew or change their *private health plan*, should visit <u>HealthCare.gov</u> or call 1-800-318-2596. Oregonians can apply for OHP at any time of the year; enrollment is always open.

Maxine and Max - Gene Sundet, Clackamas

To apply, Oregonians can go online to OregonHealthCare.gov to learn more.

October 2015 SNAP honor roll								
100% accuracy!								
0911 Bend APD	100%	1612 Madras APD	100%					
0913 La Pine APD	100%	2518 West Portland APD	100%					
0914 Redmond APD	100%	3111 La Grande APD	100%					
1017 Roseburg APD	100%	3112 Enterprise APD	100%					
1211 John Day APD	100%	3211 Florence AAA	100%					
1311 Burns APD	100%	3518 Gresham AAA	100%					
1611 Prineville APD	100%	3617 McMinnville AAA	100%					
90% or better accuracy!								
1717 Grants Pass DSO	96.00	3011 Pendleton APD	93.33					
1513 Medford SSO	95.83	0310 Canby APD	92.86					
2411 Salem AAA	94.83	2019 Cottage Grove APD	92.86					
2011 Eugene AAA	93.75	1517 Medford DSO	92.31					
0311 Oregon City APD	93.33	1418 South East Portland	91.67					
0411 Warrenton AAA	93.33	1811 Klamath Falls APD	91.30					
2311 Ontario APD	93.33	2211 Albany AAA	90.00					
2818 North/North East Portland AAA	93.33	3411 Hillsboro APD	90.00					
55% of all AAA and APD branches are on the honor roll!								

Client-employer responsibilities

Each month the Medicaid APD Long Term Care Systems Policy Unit will share links to helpful tools which can be found in the APD case management tools website. This month the tool is the *Client-Employer Responsibilities: Tasks, Warning Signs, and Interventions* document. Although the tool is not an exhaustive list, as every situation is unique, case managers may find this useful when working with consumers. The tool includes:

- Locating, screening, and hiring homecare workers (HCWs);
- Supervising and training HCWs;
- Scheduling work, leave, and coverage;
- Tracking hours worked and verifying authorized hours completed by HCWs;
- Recognizing, discussing, and attempting to correct HCW deficiencies;
- Discharging unsatisfactory workers.



Gustav -Karen Kaino, Central Office

Each topic offers warning signs and case manager interventions to assist workers in recognizing potential issues and tips on how to work through each topic. Please click on the links included above to view the tool directly.

Medicaid APD Long Term Care Systems Policy

HCBS changes

The Centers for Medicare and Medicaid Services (CMS) issued regulations outlining settings in which states are allowed to pay for Medicaid Home and Community-Based Services (HCBS). These regulations ensure individuals can live in community integrated settings and help provide customers with a home where they feel more in control of their surroundings.

There are eight main points covered by these new regulations:

- 1. Access to food;
- 2. Choice of setting;
- 3. Decorating and furnishing;
- 4. Locks on bedroom/living unit doors;
- 5. Shared rooms/roommates;
- 6. Visitors;
- 7. Control over individual schedule/activities;
- 8. Written residency agreement.



Bubba, Amos, and Bentley -Kate Hall, Albany

APD's job is to make sure service providers are in compliance with new regulations no later than March, 2019; we are already taking steps to help consumers and providers prepare for these new changes.

In late summer and early fall, APD staff partnered with DD and OHA to host educational forums across the state. Hundreds of providers, consumers, family members and advocates attended to find out about upcoming changes. APD staff engaged in open discussion on the impact, expectation, and preparation for the new regulations; feedback received was thoughtful and is helping drive the next steps toward implementation.

The Home and Community-Based Services website has information on the forums and provider and consumer surveys, links to resources including FAQs, and provider training materials.

Oregon continues to be a leader in providing In-Home and Community-Based Care and is committed to furthering these efforts toward providing services to protect, empower, respect choice, and preserve dignity.

Mike McCormick, APD Director, APD monthly Q&A

SNAP civil rights training

The annual mandatory online SNAP Civil Rights training on the DHS Learning Center for APD and AAA staff working with SNAP benefits: Course number: C049484 and Keywords: *Civil Rights*.

The training has changed from prior years; you must take the entire course including the quiz to receive a *Complete* status on your training records.

Medical deduction for maintaining an attendant

SNAP has received questions regarding how to apply a medical deduction when an elderly or disabled individual has costs to maintain an attendant, a home health aide, a housekeeper, or dependent care services. To count this as a deduction, the person must have a need due to age or illness; there is no requirement to have a medical professional document a need for an attendant. The worker would simply have a conversation with the individual to clarify there is a need

We would allow any cost paid to an attendant or agency, and would require verification of the cost. Examples of possible verification could be copies of checks paid, a written agreement between the individual and the attendant, or even a written or verbal statement from the attendant. If the individual is providing the majority of the attendant's meals we would also allow deduction equal to a one-person SNAP payment standard.

Gunner - Dawn ^a Cain, Pendleton

For example: A customer who is 75 years of age needs assistance with housekeeping and decides to hire an attendant to help her 2 days a week at 3 hours each day. The rate of pay is \$13.00 per hour; the customer does not provide any of the attendant's meals. The customer turns in a written statement signed by herself and the attendant.

The worker will count a medical deduction of: 2 days x 3 hours = 6 hours x \$13.00 = \$78.00 per week x \$4.3 = \$335.40. SNAP Policy Analysts

Payment schedule changes

As you have seen on APD-IM-15-087, a significant change is occurring in how payroll will be processed for homecare workers (HCW)s. They will have three (3) business days after the end of each pay period to submit a correctly completed voucher (1st-15th and 16th-30th for everyone), then the local office will have eight (8) business days to process the voucher after the three day deadline. This change is significant as all HCWs who have submitted vouchers will be paid on the same day, regardless of when it was received or processed.

There are a couple of things which need to be clarified on the HCW payroll calendar. Any pay periods prior to January 1, 2016 will be paid once the voucher is processed in the CEP system; the voucher won't be held until the next payday. Also, the check write date means the day that the payment will be issued for all processed vouchers. The payment will be issued that night, then will be either mailed out or sent as an EBT. HCWs will also receive clarifications on how payroll processing will work.

Speaking of the HCW payroll calendar, an updated version of it has been posted on our Case Management tools website, under Homecare Worker. It is a printable version that is not in color, however it will be more accessible as most offices do not have color printers.

Please send any questions to mathew.g.rapoza@state.or.us.

December 2015 training calendar								
Monday	Tuesday	Wednesday	Thursday	Friday				
	1	2	3	4				
	Service financial eligibility (8:30 - 4:30) Independent Choices program (8:30 - 4:30)	Service financial eligibility (8:30 - 4:30)	Oregon ACCESS Inquiry (8:30 - 4:30)	DV 101 (8:30 - 4:30)				
7	8	9	10	11				
	CBC: 512 (8:30 - 4:30)	CBC: 512 (8:30 - 4:30) CAPS basics (8:30 - 4:30)	CAPS basics (8:30 - 4:30)	Cultural competency and cultural humility (8:30 - 4:00)				
14	15	16	17	19				
Cultural competency and cultural humility (8:30 - 4:00) Ask diversity, Portland (9:00 - 4:00)	Cultural competency and cultural humility (8:30 - 4:00)	Advanced service planning (8:30 - 4:30)	Advanced service planning (8:30 - 4:30)					
	v - Crystal agne, EAU	23	24	25 CLOSED				
cha	es and availability and nge. Please review a DHS Learning Cente	availability on	31	Bring on the NEW YEAR!				

EDMS Expansion:

Scanning Support Tools Training Now Available!

The **EDMS Expansion Project** will be rolling out the

Scanning Support Tools

to your office!

This rollout will provide software, tools and training to assist in:

Additional **scanning** capabilities with your branch's Ricoh Multi-function machines – scanned documents will go to the branch's network folder

Viewing, Combining, Annotating and quality checking documents with the new Advanced Tiff Editor (ATE) image viewer

Uploading documents to EDMS from any desktop with the new version of the Remote Scan Upload tool

*Scanning Support Tools will prepare your office for the upcoming EDMS System Modification.



To help prepare you for this rollout of tools, the following trainings are now available:

Web Based Training (WBT)

Available within the Learning Center:

- 1. Preparing and Scanning Customer Documents (Course C05144)
- 2. Data Capturing Using the WEBM Screen and Combining Documents (Course C05145)
- 3. Sending Documents to EDMS (Course C05147)
- 4. Case Information Document Searching in EDMS (Course C05150)
- 5. New EDMS Standardized Data Capture Process Demonstration Video (Course C05232)

Quick Reference Guides (QRGs)

These printable guides can be accessed on the **EDMS Expansion Webpage**:

- 1. Kodak Scanner Maintenance for i1420 (SSP)
- 2. Kodak Scanner Maintenance for i3250 (AAA/APD)
- 3. Kodak Scanner Maintenance for i2420 (AAA/APD)
- 4. Scanning Support Tools (SST) Process Steps
- 5. Preparing and Scanning Customer Documents
- 6. Data Capturing Using the WEBM Screen and Combining Documents
- 7. Documents Types for AAA/APD
- 8. Document Types for SSP
- 9. When to Add Additional WEBM Coversheets
- 10. Sending Documents to EDMS
- 11. Resolving Problem Files
- 12. Case Information Document Searching
- 13. Searching with the Wild Card in EDMS
- 14. Sending Documents to EDMS

All staff who will be involved in scanning, and viewing of EDMS documents are encouraged to take the Web Based Trainings (WBTs) and print the Quick Reference Guides (QRGs) for reference as needed.

For more information, contact the EDMS Expansion project at: EDMS.Expansion@state.or.us

December 2015 Community Based Care payment schedule

December provider service payments for the APD and DD 512 Programs, and the CEP Program will issue the night of Tuesday, December 1st, and mail to providers the next business day which is Wednesday, December 2nd.

Direct Deposit (EFT) payments will also issue per the schedule above. However, rather than being mailed, they will be sent to the Department of Treasury and out to individual banks for processing. <u>Banks are allowed to use up to three (3) banking days to process direct deposit payments which does not include weekends or holidays!</u> Please note DHS does not have any control of how and when individual banks process their direct deposit payments.

Per the agreement signed by the provider to begin direct deposit of their payments, the provider is required to confirm funds are available before making purchases out of their account. DHS will not reimburse providers for overdraft charges due to insufficient funds.

• EFT payments will be available on or before 11:59 pm of Friday, December 4th.

Direct Deposit information, sign-ups, changes to account information, and other questions should be directed to the E-Commerce Unit at 503-945-6872.

Kristen Hutton, SPD Provider Relations Unit

Familial housing rights

Did you know families with children have been protected from discrimination in housing since 1988? At that time, the vast majority of housing in the U.S. was advertised as "no pets, no kids." The fact that it was so hard for families to find housing was the driving force behind legislation to protect them from discrimination.

"No kids", "no teenagers", and "no toddlers" policies are no longer legal in housing. If you find a housing provider who discriminates against families with children, please let us know!

"Familial status" for housing means having a child under age 18 in the household, whether living with a parent, a legal custodian, or their designee. It also covers a woman who is pregnant, and people in the process of adopting or gaining custody of a child/children.

Jax - Jodi West, LaGrande

The only type of housing that is excluded from familial status protections is qualified housing for seniors. Those who intend to operate senior housing should get adequate information about meeting the qualifications.

To learn more about familial status protection in housing, or more information about fair housing and the protected classes, visit www.FHCO.org.

The Fair Housing Council is a nonprofit civil rights organization serving Oregon. Call the free Fair Housing hotline at 800-424-3247, ext. 2 or visit www.fhco.org.

Jo Becker, Education and Outreach Coordinator

Don't forget! When taking a denial action on a SNAP application, it must be done *on the 30th day* or as soon as possible following the 30th day. <u>Do not</u> deny an application *before* the 30th day unless it is being denied for a reason other than failure to complete the application process. 461-115-0210; SNAP: B. 9. Application processing time frames

Home and Community-Based Services (HCBS) regulations

What's going on

- New federal regulations define the characteristics of home and community based services;
- States must come into compliance by March 2019 with key benchmarks starting in 2015.

New freedoms, protections, rights

All individuals receiving services have the following rights and protections:

Individuals have:

- Access to the broader community;
- Choice of non-disability specific setting;
- Choice of a private room;
- A person-centered planning process and plan;
- Choice of who is on their person-centered care team.

Individuals have opportunities to:

- Engage in community life;
- Receive services in the community;
- Control personal resources;

Seek employment and work.

Term to note: "Provider owned, operated or controlled" means the provider owns, operates or has a financial interest in the setting.

Additional protections and rights

For individuals in *residential settings* (provider owned operated or controlled) including AFHs, ALFs, RCFs, and specialized living settings have the following additional protections or rights:

- Privacy/locks on bedroom or unit doors;
- Can decorate and furnish their room;
- May have visitors any time;
- Have a choice in roommate if they are sharing a room;
- Freedom to control schedules and activities;
- Access to food at any time.

Individually based limitations

There can be some limits on rights if:

- The case manager determines the individual's health and safety are at risk;
- The individual does not understand the danger or risk;
- The provider has tried and documented other ways to address the issue;
- The individual consents to the limits.

More information: http://www.oregon.gov/dhs/seniors-disabilities/HCBS/pages/index.aspx



Poopie and Gus
- Hans Anderson,
Portland

More NVRA Q&A

Here are more questions and answers about the National Voter Registration Act (NVRA) procedures. If you have a question, contact Karen Kaino by phone, 503-569-7034, email: karen.l.kaino@state.or.us, or IM.

Q: My co-worker says we should only be using the 500 forms – is she right?

A: No, she is not. We NEVER, EVER, EVER, EVER for ANY reason whatsoever give out the 500 – this is in the manual: *The MSC 500 lobby form, sometimes called the "lick-and-stick" form, has an adhesive strip on one side to form a self-sealing envelope. Staff may not mail or hand out the MSC 500.* The 503 is the ONLY form we hand out. We are required by federal and state law to use the form with the declination, which is the MSC/SEL503, *Oregon Voter Registration Card with Declination*. FSAM, IV: Voter Registration, section E. Registration forms.



Roxy - Barb Houser, Canby

Q: I received an 853 change report form reporting a change of address which does not have an NVRA question on it. What do I do now?

A: We didn't add the NVRA question to this form because it is not actually a request for benefits. If you are changing benefits, you can include a DHS 503 with the change notice, tear off the declination, mark it "no" (they didn't say yes, so it's a no), and give the declination section to your site coordinator. Please narrate the DHS 503 was mailed.

Q: If we talk to an authorized rep for a phone interview do we need to narrate NVRA?

A: No you do not need to narrate anything about NVRA if you speak to a person who is not the benefit recipient. Because the rep is not allowed to answer the question, we have no obligation to narrate anything; the same thing is true for a family member not on the case or any other person authorized to speak on the customer's behalf and <u>not</u> receiving benefits. **FSAM**: IX Voter Registration, section **A**: Overview.

Q: Why does APD have to narrate and SSP does not? How do I know if they offered voter registration if they don't narrate?

A: You can look on EDMS for the SSP records to verify what the customer received. Also, we can trust our fellow agency to follow the same rules we do so if the case was processed at an SSP office, you may consider voter registration taken care of when the case arrives in your office. If the case was transferred without processing, you will be required to ask about voter registration. Eventually, APD and AAA offices will have all (most) of our files in electronic storage and narration of voter registration will become less essential. Karen will work with the EDMS coordinator to determine our progress and let everyone know when we get there. In the meantime – keep narrating!

Q: We can't tell if the Elections office received our report -how do weverify they did?

A: APD doesn't get a continuous record of received report from the elections office. If you have any concerns, you may contact the Elections office directly and tell them the time period in question to verify they received your reports.

Long term services and supports innovator agents at work

Here's a recent great Diversion/Transition (D/T) success story! The individual had a severe car accident in 2013 on an icy road out of state, resulting in quadriplegia with severe neurological injuries impacting his to use his arms and hands and had some cognitive impairment. He shared his accident changed his life and "threatened his independence". He spent over 2 years in a nursing facility. While the nursing home took care of his needs, he had a tremendous desire to transition out into the community and his own place.

It took a great collaborative effort from his doctor's office supports, his D/T case manager, D/T nurses, the Medicaid eligibility specialist, the CCO insurance staff, the nursing facility

social worker, low income housing community development services, myself, and the consumer's determination and persistence to make this happen. We brought together: D/T funds for the move and amenities needed, service plan exception hours for the in home providers, insurance to provide the needed equipment, housing to make apartment modifications, and his doctors to order Home Health and other supports, to make this plan work!



Ruger - Aaron Malvaney, Redmond

Prior to the accident, he had a successful career and family life in his own apartment. Today he has a single level apartment with widened doorways,

a special electric key pad lock he can use to get in and out of his apartment, an emergency response unit for emergencies, a special electronic wheel chair, hospital bed, shower chair and a service plan with enough hours to meet his needs. He has transportation to and from his doctor appointments as well as some shopping and the Supplemental Nutrition Assistance program to assist with nutritional needs.

His advice to others who have similar disabilities is, "Be patient and don't give up".

Lavinia Goto, Project Manager, Long Term Care Innovation, Northwest Senior and Disability Services

Privacy and security training reminder

All DHS employees are required to complete two online refresher courses on privacy and information security **by November 27, 2015** - *so NOW! Do it NOW!* The information security refresher course takes about 45 minutes and the privacy refresher course takes about 30 minutes. Staff will take the courses via the DHS/OHA Learning Center:

- Current employees;
- New employees;
- Temporary staff, interns, and volunteers;
- Partners and contractors.

For more information see the Information Security and Privacy Office (ISPO)'s Awareness and Education intranet page. If you don't know which course to register for, email ISPO. AwarenessEducation@state.or.us. State offices are closed the 27th - so NOW! Do it NOW!

Able-bodied adult without dependents – "ABAWD"

Since 2002, Oregon has waived the ABAWD time limits due to high unemployment. The State's averaged unemployment rate is no longer at least 20 percent of the national average over a 24-month period and thus the statewide ABAWD wavier is ending 12/31/2015. We believe due to the high unemployment rate for most of the state, all counties, except Multnomah and Washington County, will be waived from the time limit. The ABAWD time limits will start January 1, 2016 for Multnomah and Washington County.

What is an ABAWD?

An ABAWD is an able-bodied person receiving SNAP benefits who is at least age 18 and not yet 50 years old. They have no child under age 18 in the filing group. Doesn't need to be in the benefit group.

Time limits:

An ABAWD's eligibility for SNAP for a non-waived county (Multnomah & Washington) is limited to receiving SNAP for three months in a 36-month period without meeting the special work requirements.



Sasha -John Flores, Roseburg

Who is Exempt?

The ABAWD can be exempt from the time limit if they qualify for one of the Employment and Training Work Registration Exemption codes for activities such as disabled or caring for a disabled person, self-employed, receiving unemployment, and several others.

What is ABAWD Participation?

Working and/or participating in and complying with special work requirements at 20 hours per week, aver- aged to 80 monthly, or participating in Workfare averaging 20 hours monthly.

What are the Work Requirements?

- Work for pay or as a volunteer. Voluntary work must be performed for a private forprofit or non- profit employer or a governmental agency;
- For self-employed individuals, countable income after deducting the costs of producing income, must average at least the federal minimum wage times 20 hours per week;
- Participate in a program under the Workforce Investment Act of 1998;
- Participate in a program under section 236 of the Trade Act of 1974;
- Comply with OFSET; however, work search activities cannot exceed nine hours per week and work search activities must be combined with other work-related activities to equal 20 hours per week;
- Workfare.