

State of Florida

Interim Work Verification Plan

The statute required HHS to specify what each State must do to verify its work participation information. As outlined in 45 CFR 261.62, each State must establish and employ procedures to:

- Determine whether its work activities may count in the participation rate;
- Determine how to count and verify reported hours of work;
- Identify who is a work-eligible individual; and
- Monitor compliance with the procedures through internal controls.

The State must submit its interim Work Verification Plan to HHS by September 30, 2006 for approval. Failure to submit the plan opens the State to penalty liability of five percent of the grant. The plan will be reviewed for completeness. If any modifications are required, HHS will notify states in writing. A state must make all changes and have the final plan approved by HHS no later than September 30, 2007. The State must submit its plan to the Office of Family Assistance (OFA), with a copy to the appropriate ACF Regional Office. The original must be sent to:

Office of Family Assistance
Administration for Children and Families
5th floor East
370 L'Enfant Promenade, SW.
Washington, DC 20447

I. General provisions: the plan is designed for the State to define each of the twelve countable work activities (within federal definitions), as well as how the State determines the countable hours and the documentation used to monitor the participation to ensure that only actual hours are reported. There are four general guidelines that should be followed when drafting the definitions and requirements for the work activities under the plan (for each activity):

1. Describe the services or programs the State will use to meet the federal work category. Does the definition include and meet all federal requirements?
2. Describe how Florida determines the number of countable hours of participation for each component of the activity.
3. Describe how the state verifies the "actual" hours of participation for the activity. Include the procedures for obtaining and maintaining the documentation used.
4. Describe the methods of daily supervision that the State will use.

Florida Background:

The Temporary Assistance for Needy Families (TANF) Program in Florida is carried out through four state agencies, a state-level policy board, Workforce Florida, Inc. (WFI), and a network of Regional Workforce Boards (RWB). The agencies are: 1) Department of Children and Families (DCF), 2) Agency for Workforce Innovation (AWI), 3) Department of Health (DOH) and 4) Department of Military Affairs (DMA).

For purposes of this work verification plan, the Department of Children and Families, Workforce Florida, Inc. and the Agency for Workforce Innovation have collaborated to describe the necessary elements of the plan in the context of each agency's respective role in delivering a statewide program to assist TANF recipients make the transition from welfare to self-sufficiency.

- ❑ **Eligibility Determination, Cash Assistance Payments and Federal Reporting:** The **Department of Children and Families** is the recipient of the TANF block grant and is responsible for determining eligibility for TANF cash assistance, issuing cash assistance payments to TANF-eligible families and submitting all fiscal and programmatic reports, including data pertaining to the participation rate calculation.

- ❑ **Planning, Policy and Strategic Direction:** The Workforce Innovation Act of 2000 (Chapter 445 F.S.) consolidated most of Florida's workforce programs (TANF, Workforce Investment Act (WIA), Wagner-Peyser) under a single point of accountability--**Workforce Florida, Inc.** (WFI). As the state's chief workforce policy organization, the non-profit public/private partnership provides policy and oversight to Florida's 24 **Regional Workforce Boards** (RWBs) and the Agency for Workforce Innovation, the designated state agency for administering workforce programs, funding and personnel. The Board of Directors appointed by the Governor is the governing body for WFI.

- ❑ **Administration and Accountability:** The **Agency for Workforce Innovation** translates state policy on work activities and support services into action. It contracts for all workforce services with RWBs to deliver programming at the local level, and is the state agency responsible for ensuring that workforce funds and programs are appropriately administered and monitored for accountability.

The Department of Children and Families has supplied responses related to eligibility determination and federal data integrity and reporting; WFI and AWI have provided responses related to work activities, and the documentation or verification of work hours; responses related to monitoring and the transition of work data from AWI's system to DCF's system have been supplied by both agencies. Each agency has automated management and information systems for recording and maintaining participant data and other source material used in the federal reports: Department of Children and Families' system is the Florida Online Recipient Integrated Data Access (FLORIDA). The workforce system is the One Stop Service Tracking (OSST) System.

Plan Terminology: Responses related to activities or functions performed through DCF's program network are indicated by: "DCF," or "eligibility." Responses related to activities or functions performed through the workforce network are indicated by: "AWI," "RWB," "provider," or "workforce." Activities that are inclusive of both systems are denoted as "Florida," or "State."

Elements	Process Recommended
Unsubsidized Employment	
1. Describe the services or programs the State includes under the activity.	<p>Current language under 445.024 (F.S.): <i>Unsubsidized employment is full time or part time employment in the public or private sector that is not directly supplemented by federal or state funds. Paid apprenticeship and cooperative education activities are included in this activity.</i></p> <p>Florida proposes to revise Florida Statute 445.024 (1) (a) to align with the federal regulations during the spring 2007 legislative session. This will include employment where employers receive tax incentives.</p>
2. Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.	<p>Florida uses data on unsubsidized employment maintained in either the AWI system or the DCF system for its reports: (a) AWI information entered by RWB workforce staff and (b) applicant/participant income/hours information entered and retained in the DCF eligibility system. The plan, therefore describes two processes for determining the number of hours countable for participation in unsubsidized employment.</p> <p>(a) AWI's process requires an RWB staff member to secure documentation for each countable hour of participation prior to entering the hours in the workforce system. The system automatically generates a field to record actual participant hours completed for every week an activity is open on an individual who is receiving temporary cash assistance and</p>

Elements	Process Recommended
<p>Unsubsidized Employment (cont.)</p>	<p>required to participate in the work program. The participation field remains blank until a number from zero to greater than zero is entered in the system. A staff member does not automatically enter scheduled hours but verifies participation for each hour before manually populating the participation field.</p> <p>(b) DCF determines and verifies income/hours at initial application and again at redetermination which is required every six months. During the certification period, DCF accepts an individual's statement of an increase in income/hours and verifies information at redetermination. Staff verifies any report of a decrease in income/hours immediately. DCF enters hours of work on FLORIDA system screens designated for employment. Verification of income/hours is via employer statement or pay stubs submitted by the individual.</p>
<p>3. Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.</p>	<p>RWB workforce personnel verify hours of actual participation through documentation that includes (but is not limited to) a verification of employment signed by the employer, and/or pay stubs, time sheets, a copy of a check, money order, or other payment forms submitted by the individual. If documents do not indicate "wage per hour" or "actual hours completed," staff divide the pay by minimum wage to calculate the total hours worked for the time period. Staff may also verify employment hours by contacting the employer directly. In addition to employment information on hours, wages, etc, employer contact verifications must include the employer's name, date contacted, person talked with and the name of the staff person who has secured the verification. A staff member enters the information in the OSST system and maintains the verification in the case file.</p> <p>DCF verifies hours via employer statement or pay stubs submitted by the individual, enters the information in FLORIDA and maintains the information in the case file.</p> <p>Participation hours submitted in the reports are from either agency's automated system according to where the documentation is received and recorded.</p>
<p>Special Documentation</p> <p>1. For self-employment, describe how the State counts and verifies hours of participation. A state may not count more hours toward the participation rate for a self-employed individual than the individual's self-employment income (gross income less business expenses) divided by the federal minimum wage.</p>	<p>Self-employment is a countable form of unsubsidized employment. To earn participation credit for hours of self-employment, a participant must provide documentation that includes, but is not limited to, gross income obtained minus business expenditures as substantiated by copies of money orders, checks and other forms of proof of income or expenditures. For self-employed individuals Florida will count no more hours of participation than the number that results from dividing the gross income minus business expenses by the applicable minimum wage and verified by the documentation presented. Data is entered on the appropriate system according to which agency receives the documentation.</p>

Elements	Process Recommended
<p>Unsubsidized Employment (cont.)</p> <p>2. If the State intends to project forward hours of participation based on current, documented, actual hours, explain how it will make this projection.</p>	<p>Florida will use the “project forward hours” provision. The state will report projected actual hours of employment participation for up to six months based on current documented actual hours of work. Any time the state receives information that the individual’s actual hours of work have changed, or no later than the end of any six month period, Florida will re-verify the individual’s current actual average hours of work, and report these projected actual hours of participation for another six-month period.</p> <p>Florida will project participation hours based upon the current income/hours provided in the employer statement or by pay stubs submitted by the individual.</p>
<p>Subsidized Private Sector Employment</p>	
<p>1. Describe the services or programs the State includes under the activity.</p>	<p>Current language under 445.024 (F.S.): <i>Subsidized private sector employment is employment in a private for-profit enterprise or private not-for-profit enterprise which is directly supplemented by federal or state funds. A subsidy may be provided in one or more of the forms listed: (a) work supplementation--A work supplementation subsidy diverts a participant’s temporary cash assistance under the program to the employer. The employer must pay the participant wages that equal or exceed the applicable minimum wage. Work supplementation may not exceed 6 months. At the end of the supplementation period, the employer is expected to retain the participant as a regular employee without receiving continued subsidy. A work supplementation agreement may not be continued with any employer who exhibits a pattern of failing to provide participants with continued employment after the period of work supplementation ends. (b) On-the-job-training--On-the-job-training is full-time, paid employment in which the employer or educational institution, in cooperation with the employer, provides training needed for the participant to perform the skills required for the position. The employer or the educational institution on behalf of the employer receives a subsidy to offset the cost of the training provided to the participant. Upon satisfactory completion of the training, the employer is expected to retain the participant as a regular employee without receiving a subsidy. An on-the-job training agreement may not be continued with any employer who exhibits a pattern of failing to provide participants with continued employment after the on-the-job training subsidy ends. (c) Incentive payments--Regional workforce boards may provide additional incentive payments to encourage employers to employ program participants. Incentive payments may include payments to encourage the employment of hard-to-place participants, in which case the amount of the payment shall be weighted proportionally to the extent to which the participant has limitations associated with the long-term receipt of welfare and difficulty in sustaining employment. Incentive payments may also include payments to encourage employers to provide health care insurance benefits to current or former program participants. In establishing incentive payments, regional workforce boards shall consider the extent of prior receipt of welfare, lack of employment experience, lack of education, lack of job skills, and other appropriate factors. A participant who has complied with program requirements and who is approaching the time limit for receiving temporary cash assistance may be defined as "hard to place." Incentive payments may include payments in which an initial payment is made to the employer upon the employment of a participant, and the majority of the incentive payment is made after the employer retains the participant as a full-time employee for at least 12 months. An incentive agreement may not be continued with any employer who exhibits a pattern of failing to provide participants with continued employment after the incentive payments cease. (d) Tax credits--An employer who employs a program participant may qualify for enterprise zone property tax credits under s.220.182, the tax refund program for</i></p>

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<p>Subsidized Private Sector Employment (cont.)</p>	<p><i>qualified target industry businesses under s.288.106, or other federal or state tax benefits. The regional workforce board shall provide information and assistance, as appropriate, to use such credits to accomplish program goals. (e) Training bonus--An employer who hires a participant in the welfare transition program and pays the participant a wage that precludes the participant's eligibility for temporary cash assistance may receive \$250 for each full month of employment for a period that may not exceed three months. An employer who receives a training bonus for an employee may not receive a work supplementation subsidy for the same employee. "Employment" is defined as 35 hours per week at a wage of no less than minimum wage.</i></p> <p>Florida proposes to revise Florida Statute 445.024 (1) (b) to align with the federal regulations during the spring 2007 legislative session. This will include using a third-party contractor to serve as employer of record, paying that contractor a fee to cover salary, expenses and success in placing employees; and a supported work model so that RWBs may offer a subsidy to employers to provide employment for individuals with disabilities as defined under the Rehabilitation Act of 1973 (29 U.S.C. 705(35)) in an integrated setting for wages consistent with those paid to non-disabled workers in similar job functions. The workers with disabilities may receive individualized services such as, but not limited to, transportation, family support, or additional supervision.</p>
<p>2. Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.</p>	<p>Florida uses data on subsidized private sector employment from either the AWI system or the DCF system for its reports: (a) AWI information entered by RWB workforce staff and (b) applicant/participant income/hours information entered and retained in the DCF eligibility system. The plan, therefore describes two processes for determining the number of hours countable for participation in subsidized private sector employment.</p> <p>(a) AWI's process requires an RWB staff member to secure documentation for each countable hour of participation prior to entering the hours in the workforce system. The system automatically generates a field to record actual hours completed for every week an activity is open on an individual who is receiving temporary cash assistance and required to participate in the work program. The participation field remains blank until a number from zero to greater than zero is entered in the system. A staff member does not automatically enter scheduled hours but verifies participation for each hour before manually populating the participation field.</p> <p>(b) DCF determines and verifies income/hours at initial application and again at redetermination which is required every six months. During the certification period, DCF accepts an individual's statement of an increase in income/hours and verifies information at redetermination. Staff verifies any report of a decrease in income/hours immediately. DCF enters hours of work on FLORIDA system screens designated for employment. Verification of income/hours is via employer statement or pay stubs submitted by the individual.</p>
<p>3. Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.</p>	<p>RWB workforce personnel verify hours of actual participation through documentation that includes (but is not limited to) a verification of employment signed by the employer, and/or pay stubs, time sheets, a copy of a check, money order, or other payment forms submitted by the individual. If documents do not indicate "wage per hour" or "actual hours completed," staff divide the pay by minimum wage to calculate the total hours worked for the time period. Staff may also</p>

Elements	Process Recommended
<p>Subsidized Private Sector Employment (cont.)</p>	<p>verify employment hours by contacting the employer directly. In addition to employment information on hours, wages, etc, employer verifications must include contact information such as the employer's name, date contacted, person talked with and the name of the staff person who has secured the verification. A staff member enters the information in the OSST system and maintains the verification in the case file.</p> <p>DCF verifies hours via employer statement or pay stubs submitted by the individual, enters the information in FLORIDA and maintains the information in the case file.</p> <p>Participation hours submitted for the reports are from either agency's system according to where the documentation is received and recorded.</p>
<p>Special Documentation:</p> <p>1. If the State intends to project forward hours of participation based on current documented, actual hours, explain how it will be used.</p>	<p>Florida will use the "project forward hours" provision. The state will report projected actual hours of employment participation for up to six months based on current documented actual hours of work. Any time the state receives information that the individual's actual hours of work have changed, or no later than the end of any six month period, Florida will re-verify the individual's current actual average hours of work, and report these projected actual hours of participation for another six-month period.</p> <p>Florida will project participation hours based upon the current income/hours provided in the employer statement or by pay stubs submitted by the individual.</p>
<p>Subsidized Public Sector Employment</p>	
<p>1. Describe the services or programs the State includes under the activity.</p>	<p>Current definition under 445.024 (F.S.): <i>Subsidized public sector employment is employment by an agency of the federal, state, or local government which is directly supplemented by federal or state funds. The applicable subsidies provided under paragraph b (subsidized private sector employment) may be used to subsidize employment in the public sector. Public sector employment is distinguished from work experience in that the participant is paid wages and receives the same benefits as a non-subsidized employee who performs similar work. Work study activities administered by educational institutions are included in this activity.</i></p> <p>Florida proposes to revise Florida Statute 445.024 (1) (c) to align with the federal regulations during the spring 2007 legislative session. The same models under Subsidized Private Sector Employment (third party contractor and the supported work for individuals with disabilities) will be proposed for Subsidized Public Sector Employment. Work study will replace work supplementation in the available models, and guidance will be issued that the employer is subject to FLSA.</p>
<p>2. Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.</p>	<p>Florida uses data on subsidized public sector employment from either the AWI system or the DCF system for its reports: (a) AWI information entered by RWB workforce staff and (b) applicant/participant income/hour information gathered and retained in the DCF eligibility system. The plan, therefore describes two processes for determining the number of hours countable for participation in subsidized public sector employment.</p>

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<p>Subsidized Public Sector Employment (cont.)</p>	<p>(a) AWI's process requires an RWB staff member to secure documentation for each countable hour of participation prior to entering the hours in the workforce system. The system automatically generates a field to record actual hours completed for every week an activity is open on an individual who is receiving temporary cash assistance and required to participate in the work program. The participation field remains blank until a number from zero to greater than zero is entered in the system. A staff member does not automatically enter scheduled hours, but verifies participation for each hour before manually populating the participation field.</p> <p>(b) DCF determines and verifies income/hours at initial application and again at redetermination which is required every six months. During the certification period, DCF accepts an individual's statement of an increase in income/hours and verifies information at redetermination. Staff verifies any report of a decrease in income/hours immediately. DCF enters hours of work on FLORIDA system screens designated for employment. Verification of income/hours is via employer statement or pay stubs submitted by the individual.</p>
<p>3. Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.</p>	<p>RWB workforce personnel verify hours of actual participation through documentation that includes (but is not limited to) a verification of employment signed by the employer, and/or participant submitted pay stubs, time sheets, a copy of a check, money order, or other payment forms. If documents do not indicate "wage per hour" or "actual hours completed," staff divide the pay by minimum wage to calculate the total hours worked for the time period. Staff may also verify employment hours by contacting the employer directly. In addition to employment information on hours, wages, etc, employer contact verifications must include the employer's name, date contacted, person talked with, contact information and the name of the individual who has secured the verification. A staff member enters the information in the OSST system and maintains the verification in the case file.</p> <p>DCF verifies hours via employer statement or pay stubs submitted by the individual, enters the information in FLORIDA and maintains the information in the case file.</p> <p>Participation hours submitted in the reports are from either agency's system according to where the documentation is received and recorded.</p>
<p>Special Documentation: If the state intends to project forward hours of participation based on current, documented, actual hours, explain how it will make this projection.</p>	<p>Florida will use the "project forward hours" provision. The state will report projected actual hours of employment participation for up to six months based on current documented actual hours of work. Any time the state receives information that the individual's actual hours of work have changed, or no later than the end of any six month period, Florida will re-verify the individual's current actual average hours of work, and report these projected actual hours of participation for another six-month period.</p> <p>Florida will project participation hours based upon the current income/hours provided in the employer statement or by pay stubs submitted by the individual.</p>

Elements	Process Recommended
Work Experience	
1. Describe the services or programs the State includes under the activity.	<p>Current language under 445.024 (F.S.): <i>Work experience is an appropriate work activity for participants who lack preparation for or experience in the workforce. It must combine a job training activity in a public or private not-for-profit agency with education and training related to an employment goal. To qualify as a work activity, work experience must include education and training in addition to the time required by the work activity, and the work activity must be intensively supervised and structured. Regional workforce boards shall contract for any services provided for clients who are assigned to this activity and shall require performance benchmarks, goals, outcomes, and time limits designed to assure that the participant moves toward full-time paid employment. A participant shall receive temporary cash assistance proportional to the time worked. A participant assigned to work experience is an employee of the state for purposes of workers' compensation coverage and is subject to the requirements of the drug-free workplace program.</i></p> <p>Florida proposes to revise Florida Statute 445.024(1) (e) to align with the federal regulations during the spring 2007 legislative session. Proposed revisions will include language that an individual who is considered an "employee" under the Fair Labor Standards Act (FLSA) must be compensated at the applicable minimum wage. In addition, the FLSA's overtime pay, child labor and record keeping requirements also apply; that TANF assistance provided to work experience participants is not considered wages for Social Security, Federal income tax or Earned Income Tax Credit purposes; that a state may consider a participant to be an "employee" for purposes of workers' compensation; and that work experience must be re-defined in statute so that work experience is not required to be combined with education and training related to an employment goal.</p>
2. Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.	<p>(a) Currently, the number of hours assigned to this activity is determined by dividing the amount of temporary cash assistance by the applicable state minimum wage. The resulting figure is then divided by 4.3 to determine the weekly requirement.</p> <p>(b) By adopting a simplified food stamp program Florida will be eligible to modify its calculation method to use the hours resulting when the value of food stamps is added to the amount of the temporary cash assistance and divided by the applicable minimum wage. This figure is then divided by 4.3 to determine maximum weekly required hours.</p> <p>AWI's process requires an RWB staff member to secure documentation for each countable hour of participation prior to entering the hours in the workforce automated system. The data entry system automatically generates a field to record actual hours completed for every week an activity is open on an individual who is receiving temporary cash assistance and required to participate in the work program. The participation field remains blank until a number from zero to greater than zero is entered in the system. A staff member does not automatically enter scheduled hours, but verifies participation for each hour before manually populating the participation field.</p>
3. Describe how the State verifies the actual hours of participation for the activity. Include the procedures for Work	Currently the workforce system records worksite hours combined with education hours as required under Florida Statutes. The process will be modified to record actual hours of participation each week an individual receiving cash

Elements	Process Recommended
<p>Work Experience (cont.)</p> <p>obtaining and maintaining documentation of hours of participation.</p>	<p>assistance and required to participate in the work program is assigned to a work experience worksite. Documentation of hours of participation may include time sheets and attendance records. To ensure that the activity is being supervised daily, the documentation must include the signature of an employer, work site sponsor or other responsible party and must be forwarded to the RWB staff no less frequently than every two weeks to be entered into the tracking system. Hours are manually entered into the workforce system based on verification of actual hours completed, and the verification is maintained in the case file. Because Work Experience is a structured program, workforce staff will communicate with the worksite supervisor on a regular basis to verify attendance and progress.</p>
<p>4. Describe the methods of daily supervision that the State will use.</p>	<p>Florida's work experience program does not require daily supervision at this time but will be modified to meet federal requirements. Guidance will be issued to require daily supervision and documentation of attendance by worksite staff, along with regular communication between the RWB and worksite supervisor/coordinator. The evidence of daily supervision will be a time sheet, attendance log or other form of attendance record signed by a worksite supervisor or other designated worksite employee. The RWB retains the documentation in the case file.</p>
<p>Special Documentation:</p> <p>None</p>	
<p>On-the-Job Training</p>	
<p>1. Describe the services or programs the State includes under the activity.</p>	<p>Current language under 445.024 (F.S): <i>On-the-job-training is full-time, paid employment in which the employer or educational institution, in cooperation with the employer, provides training needed for the participant to perform the skills required for the position. The employer or the educational institution on behalf of the employer receives a subsidy to offset the cost of the training provided to the participant. Upon satisfactory completion of the training, the employer is expected to retain the participant as a regular employee without receiving a subsidy. An on-the-job training agreement may not be continued with an employer who exhibits a pattern of failing to provide participants with continued employment after the on-the-job training subsidy ends.</i></p> <p>Florida proposes to revise Florida statute 445.024 (1) (a) (2) to align with the federal regulations during the spring 2007 legislative session. Specifically Florida will propose a supported work model with significant on-site training in skills and knowledge essential to job performance so that RWBs may offer a subsidy to employers to provide OJT for individuals with disabilities as defined under the Rehabilitation Act of 1973 (29 U.S.C. 705(35)) in an integrated setting for wages consistent with those paid to non-disabled workers in similar job functions. The workers with disabilities may receive individualized services such as, but not limited to, transportation, family support, or additional supervision.</p>
<p>2. Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs</p>	<p>AWI's process requires an RWB staff member to secure documentation for each countable hour of participation prior to entering the hours in the workforce system. The system automatically generates a field to record actual hours completed for every week an activity is open on an individual who is receiving temporary cash assistance and required to participate</p>

Elements	Process Recommended
<p>On-the-job Training (cont.)</p> <p>within the activity, the State should describe each.</p>	<p>in the work program. The participation field remains blank until a number from zero to greater than zero is entered in the system. A staff member does not automatically enter scheduled hours, but verifies participation for each hour before manually populating the participation field.</p>
<p>3. Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.</p>	<p>RWB workforce personnel verify hours of actual participation through documentation that includes (but is not limited to) a signed contract by the employer, verification of employment signed by the employer, and/or participant-submitted pay stubs, time sheets, a copy of a check, money order, or other payment forms. If documents do not indicate “wage per hour” or “actual hours completed,” staff divide the pay by minimum wage to calculate the total hours worked for the time period. Staff may also verify employment hours by contacting the employer directly. In addition to employment information on hours, wages, etc, employer contact verifications must include the employer’s name, date contacted, person talked with and the name of the individual who has secured the verification. A staff member enters the information in the OSST system and maintains the verification in the case file.</p>
<p>4. Describe the methods of daily supervision that the State will use.</p>	<p>Currently Florida’s on-the-job- training program does not require daily supervision. Guidance will be issued to require supervision and documentation of attendance by worksite staff, in addition to regular communication between the RWB and worksite supervisor/coordinator to discuss the participant’s progress. The evidence of daily supervision will be a time sheet, attendance log or other form of attendance record signed by a worksite supervisor or other designated worksite employee. The RWB retains the documentation in the case file.</p>
<p>Special documentation</p> <p>1. Describe the nature of training provided by employers that distinguishes this from subsidized employment.</p> <p>2. If the state intends to project hours of participation based on current, documented, actual hours, explain how it will make this projection.</p>	<p>The employer or educational institution on behalf of the employer receives a subsidy to offset the cost of the training provided to the participant. Unlike work experience, the individual is in paid employment during the training process. Upon satisfactory completion of the training, the employer is expected to retain the employee without further subsidy. The type of training slots for participants will vary based on the labor market, employment openings in the local area, the participant’s goals, and the employer’s skill requirements for hiring, etc. Training should include employability skills, such as organization, communication, problem solving, listening, cooperation skills, as well as skills specific to the employment position.</p> <p>Florida will use the “project forward hours” provision. The state will report projected actual hours of employment participation for up to six months based on current documented actual hours of work. Any time the state receives information that the individual’s actual hours of work have changed, or no later than the end of any six month period, Florida will re-verify the individual’s current actual average hours of work, and report these projected actual hours of participation for another six-month period.</p> <p>Florida will project participation hours based upon the current income/hours provided in the employer statement or by pay stubs submitted by the individual.</p>

Elements	Process Recommended
Job Search and Job Readiness	
1. Describe the services or programs the State includes under the activity.	<p>Current language under 445.024 (F.S): <i>Job search assistance may include supervised or unsupervised job seeking activities. Job readiness assistance provides support for job seeking activities which may include:</i></p> <ol style="list-style-type: none"> 1. <i>orientation to the world of work and basic job seeking and job retention skills</i> 2. <i>instruction in completing an application for employment or writing a resume</i> 3. <i>instruction in conducting oneself during a job interview, including appropriate dress</i> 4. <i>instruction in how to retain a job, plan a career, and perform successfully in the workplace</i> <p><i>Job readiness assistance may also include providing a participant with access to an employment resource center that contains job listings, telephones, facsimile machines, typewriters, and word processors. Job search and job readiness activities may be used in conjunction with other program activities, such as work experience, but may not be the primary work activity for longer than the length of time permitted under federal law.</i></p> <p>Florida proposes to revise F.S. 445.024 (f) to align with federal regulations during the spring 2007 legislative session.</p>
2. Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.	<p>AWI's process requires an RWB staff member to secure documentation for each countable hour of participation prior to entering the hours in the workforce system. The system automatically generates a field to record actual hours completed for every week an activity is open on an individual who is receiving temporary cash assistance and required to participate in the work program. The participation field remains blank until a number from zero to greater than zero is entered in the system. A staff member does not automatically enter scheduled hours, but verifies participation for each hour before manually populating the participation field.</p> <p>Actual hours spent in an in-house job readiness structured program will be counted as actual hours of participation. Actual hours spent on in-house job search will be counted as actual hours of participation. RWB staff will track hours spent in job readiness assistance and on in-house job search and enter the hours into the workforce system as described above.</p> <p>Each on-site contact (visit to the employer, job application filed, job interview) has a participation value of two hours in urban communities and four hours in rural communities. Job searches done via telephone and via internet will be recorded on the job search report form, must include specific information for follow-up by RWB staff and must be logged on a time sheet. Earned participation hours will be based on time sheet entries.</p>
3. Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.	<p>Under current Florida Statute, job search and job readiness assistance allows for both supervised in-house and unsupervised on-site job searches. Florida's workforce data entry system allows RWBs to enter job search and job readiness. Job readiness is considered a structured in-house program; job search may be structured in-house or on-site.</p> <p>Actual hours spent in an in-house job readiness structured program will be counted as actual hours of participation.</p>

Elements	Process Recommended
<p>Job Search and Job Readiness (cont.)</p>	<p>Actual hours spent on in-house job search will be counted as actual hours of participation. RWB staff will track hours spent in job readiness assistance and on in-house job search and enter the hours into the workforce data system. Documentation will be defined by local operating procedures and may include sign in/activity logs that are verified by RWB staff, RWB automated tracking processes or other activity tracking processes that are established by the RWB</p> <p>On-site job search includes making contact with potential employers to learn of suitable job openings via telephone, via the internet and/or in person; applying for those jobs; and interviewing for jobs. Participants will be required to complete the job search report form which must include specific information on all contacts completed via telephone and via the internet. All in-person visits to an employer, all applications submitted and all interviews for job openings must include the employer contact name, address and contact number.</p> <p>Documentation of job search activities must be retained in the case file.</p>
<p>4. Describe the methods of daily supervision that the State will use.</p>	<p>Currently, job search (both in-house and on-site) and job search assistance do not require “daily supervision.”</p> <p>In-house job search and job readiness assistance will be part of a structured activity and will be supervised by the RWB staff on a daily basis.</p> <p>On-site job search will be tracked on a daily basis using signed time sheets/contact sheets, job search entry logs and other activity tracking processes that are established by the RWB. On-site job search will be supervised on a daily basis using telephonic contact, facsimile communication, in-person interviews and other communication processes defined by the RWB and used in daily operations to track and supervise other job seeker groups (for example – WIA and Unemployment Compensation job seekers).</p>
<p>Special documentation:</p> <p>SAMH services can only be counted for the hours an individual is in actual SAMH activities. If treatment is credited, a SAMH professional must certify that such treatment is necessary.</p> <ol style="list-style-type: none"> 1. If the state intends to count substance abuse treatment, mental health treatment and rehabilitation activities, describe the criteria to determine whether the recipients are “otherwise employable” and establish the necessity of treatment or therapy. Describe the certification requirements for qualified medical or mental health professionals used in this process. 2. Describe how the state ensures there are no 	<ol style="list-style-type: none"> 1. “Otherwise employable” will be assessed by RWB and Substance Abuse and Mental Health (SAMH) professionals. The SAMH professional will certify the participant’s need for mental health or substance abuse treatment and will state whether the participant can function successfully at a job if treatment stabilizes the mental health or substance abuse condition. The medical or mental health professional who certifies treatment should be licensed and/or board certified to practice in the State of Florida. However, licensed practitioners do not lead all treatment sessions. Counselors or lay staff may lead some sessions. RWB staff must verify the hours completed in the SAMH program through an attendance log or other SAMH documentation in order to input the hours in the workforce system’s participation field. 2. DCF maintains a historical file of work eligible individuals for each federal fiscal year in which hours engaged in job search and/or job readiness were used to meet the work participation requirement. The file contains each individual’s

Elements	Process Recommended
<p>Job Search and Job Readiness (cont.)</p> <p>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).</p>	<p>personal identification number and the begin date of the week for each week used. Before reporting hours engaged in job search and/or job readiness to meet work participation requirements, DCF references this file to ensure that neither more than a total of six weeks nor more than four consecutive weeks are reported as countable hours.</p>
<p>Community Service Program</p>	
<p>1. Describe the services or programs the State includes under the activity.</p>	<p>Current language under 445.024 (F.S): <i>Community service work experience is job training experience at a supervised public or private not-for-profit agency. A participant shall receive temporary cash assistance in the form of wages, which, when combined with the value of food stamps awarded to the participant, is proportional to the amount of time worked. A participant of the welfare transition program or the food stamp employment and training program assigned to community service work experience shall be deemed an employee of the state for the purposes of workers compensation coverage and is subject to the requirements of the drug free workplace program. Community service work experience may be selected as an activity for a participant who needs to increase employability by improving his or her interpersonal skills, job retention skills, stress management, and job problem solving, and by learning to attain a balance between job and personal responsibilities. Community service is intended to:</i></p> <ol style="list-style-type: none"> 1. <i>assess compliance with requirements of the welfare transition program before referral of the participant to costly services such as career education;</i> 2. <i>maintain work activity status while the participant awaits placement into the paid employment or training;</i> 3. <i>fulfill a clinical practicum or internship requirement related to employment; or</i> 4. <i>provide work based mentoring</i> <p>Florida proposes to revise F.S. 445.024 (d) to align with the federal regulations during the spring 2007 legislative session – specifically as it relates to numbers 2 & 4 listed above. Florida will propose language that identifies the types of community service projects that serve a useful community purpose.</p>
<p>2. Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.</p>	<p>a) An RWB staff member determines the maximum number of hours a participant may be scheduled in this activity by adding the amount of the temporary cash assistance and the food stamp allotment and dividing the resulting figure by the applicable minimum wage. This total is then divided by 4.3 to determine weekly required hours.</p> <p>b) AWI’s process requires an RWB staff member to secure documentation for each countable hour of participation prior to entering the hours in the workforce system. The system automatically generates a field to record actual hours completed for every week an activity is open on an individual who is receiving temporary cash assistance and required to participate in the work program. The participation field remains blank until a number from zero to greater than zero is entered in the system. A staff member does not automatically enter scheduled hours, but verifies each hour before manually populating the participation field.</p>

Elements	Process Recommended
<p>Community Service Program (cont.)</p> <p>3. Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.</p>	<p>Each hour of actual participation is verified through documentation. Documentation of hours of participation must be forwarded to the RWB staff no less frequently than every two weeks and must include time sheets, daily attendance records or some other form of attendance log signed by a designated community service work site employee. Countable hours are manually entered into the workforce tracking system based on verification of actual hours completed, and the verification is maintained in the case file. Because a Community Service Program is a structured program, workforce staff will communicate with the worksite supervisor and verify attendance and progress on a regular basis.</p>
<p>4. Describe the methods of daily supervision that the State will use.</p>	<p>Florida's Community Service Work Experience program does not require daily supervision at this time. New guidance will include daily supervision, documentation of attendance by worksite staff and regular communication between the RWB and worksite supervisor/coordinator as requirements. The evidence of daily supervision will be a time sheet, attendance log or other form of attendance record signed by a worksite supervisor or other designated worksite employee. The RWB retains the documentation in the case file.</p>
<p>Special Documentation:</p> <p>1. 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.</p> <p>2. If a state permits self-initiated community service positions, describe how it determines that the position provides a direct community services and improves the recipient's employability.</p>	<p>1. The RWB enters into worksite contracts with the non-profit or public organizations, creating an employee/employer relationship.</p> <p>The RWB assigns the maximum scheduled hours based upon adding the cash assistance amount and the value of the food stamp allotment and dividing the total by the applicable minimum wage and dividing that figure by 4.3 weeks in the month.</p> <p>2. The participant may locate a worksite for community service by personal initiative and inform the RWB. The RWB will then negotiate a worksite contract that includes all required provisions of federal regulations with the community service agency</p>
<p>Vocational Education and Training</p>	
<p>1. Describe the services or programs the State includes under the activity.</p>	<p>Current language under 445.024 (F.S): Career Education or Training is the Florida name for vocational education and training in Florida Statute. <i>Career Education or Training is education or training designed to provide participants with the skills and certification necessary for employment in an occupational area. Career education or training may be used as a primary program activity for participants when it has been determined that the individual has demonstrated compliance with other phases of program participation and successful completion of the career and education training is likely to result in employment entry at a higher wage than the participant would have been able to attain without completion of the career education or training. Career education or training may be combined with other program activities and also may be used to upgrade skills or prepare for a higher paying occupational area for a participant who is employed.</i></p>

Elements	Process Recommended
Vocational Education and Training (cont.)	<p><i>Unless otherwise provided in this section, career education shall not be used as the primary program activity for a period which exceeds 12 months. The 12-month restriction applies to instruction in a career education program and does not include the remediation of basic skills, including English language proficiency, if remediation is necessary to enable a participant to benefit from a career education program. Any necessary remediation must be completed before a participant is referred to career education as the primary work activity. In addition, use of career education or training shall be restricted to the limitation established in federal law. Career education included in a program leading to a high school diploma shall not be considered career education for purposes of this section.</i></p> <p>Florida proposes to revise Florida statute 445.024 (1) (g) to align with the federal regulations during the spring 2007 legislative session.</p>
<p>2. Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.</p>	<p>AWI's process requires an RWB staff member to secure documentation for each countable hour of participation prior to entering the hours in the workforce system. The system automatically generates a field to record actual hours completed for every week an activity is open on an individual who is receiving temporary cash assistance and required to participate in the work program. The participation field remains blank until a number from zero to greater than zero is entered in the system. A staff member does not automatically enter scheduled hours, but verifies each hour before manually populating the participation field.</p>
<p>3. Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.</p>	<p>RWB workforce personnel verify hours of actual participation through documentation that includes (but is not limited to) time sheets and daily attendance records or logs submitted to the RWB no less often than every two weeks by the training facility. RWB staff may also verify participation hours by contacting an instructor directly. Attendance information must include the participant's name, the course and instructor name, the name of the person certifying attendance and the inclusive dates of attendance. An RWB staff member enters the information in the OSST system and maintains the verification in the case file.</p>
<p>4 Describe the methods of daily supervision that the State will use.</p>	<p>Currently, this activity does not require daily supervision.</p> <p>New guidance will be issued to RWBs to require daily supervision of the activity. Supervision will be certified by the instructor, on-line distance learning system or other authorized staff for each day the individual attends the activity and earns participation hours. The evidence of daily supervision will be a time sheet, attendance log or other form of attendance record signed by the instructor or other designated vocational institution employee. The RWB retains the documentation in the case file.</p>
<p>Special Documentation:</p> <p>1. Describe how the state ensures participation in vocational educational training does not count beyond the statutory limitations limiting participation to 12 months lifetime per individual?</p>	<p>1. DCF maintains a file of work eligible individuals whose hours engaged in vocational education have been used to satisfy work participation. The file contains the individual's personal identification number and each month that vocational education was used to meet work participation. Before submitting any vocational education hours to meet work participation requirements for an individual, DCF references this file to ensure that not more than 12 months in a</p>

Elements	Process Recommended
<p>Vocational Training and Education (cont.)</p> <p>2. Explain how the State will ensure that basic and remedial education and ESL, if such activities are counted, are of limited duration and a necessary or regular part of the vocational training?</p>	<p>lifetime have been used.</p> <p>2. Florida's career education/vocational programs have been restructured to require general basic or remedial education be completed before entry into the technical program itself. Each program has a series of completion points that correlate to the ability of the trainee. A person needing specific remedial work related to the vocational technical program enters the program at a lower completion point level, and then progresses up through the curriculum. Remedial segments are integrated as part of the skills being taught in the technical segments. Thus the nature of the curriculum design limits remedial work and insures it is of short duration.</p> <p>ESL classes are limited and most frequently are not part of countable core hours.</p>
<p>Job Skills Training Directly Related to Employment</p>	
<p>1. Describe the services or programs the State includes under the activity.</p>	<p>Current language under 445.024 (F.S.): <i>Job skills training includes customized training designed to meet the needs of a specific employer or a specific industry. Job skills training shall include literacy instruction, and may include English proficiency instruction or Spanish language or other language instruction if necessary to enable a participant to perform in a specific job or job training program or if the training enhances employment opportunities in the local community. A participant may be required to complete an entrance assessment or test before entering into job skills training</i></p> <p>Florida proposes to revise FS 445.024 (h) to align with the federal regulations during the spring 2007 legislative session.</p>
<p>2. Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.</p>	<p>AWI's process requires an RWB staff member to secure documentation for each countable hour of participation prior to entering the hours in the workforce system. The system automatically generates a field to record actual hours completed for every week an activity is open on an individual who is receiving temporary cash assistance and required to participate in the work program. The participation field remains blank until a number from zero to greater than zero is entered in the system. A staff member does not automatically enter scheduled hours, but verifies each hour before manually populating the participation field.</p>
<p>3. Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.</p>	<p>RWB workforce personnel verify hours of actual participation through documentation that includes (but is not limited to) time sheets and daily attendance records or logs submitted to the RWB no less often than every two weeks by the training facility or job site. RWB staff may also verify participation hours by contacting an instructor or other supervisor directly. Attendance information must include the participant's name, the course and instructor name if the training takes place in a training facility, the name of the person certifying attendance and the inclusive dates of attendance. An RWB staff member enters the information in the OSST system and maintains the verification in the case file.</p>
<p>4. Describe the methods of daily supervision that the State will use.</p>	<p>Currently, this activity does not require daily supervision.</p> <p>New guidance will be issued to RWBs to require daily supervision of this activity. Supervision will be certified by the</p>

Elements	Process Recommended
Job Skills Training Directly Related to Employment (cont.)	instructor, on-line distance learning system or other authorized staff for each day the individual attends the activity and earns participation hours. The evidence of daily supervision will be a time sheet, attendance log or other form of attendance record signed by a worksite supervisor, an instructor or other designated worksite or institution employee. The RWB retains the documentation in the case file.
Special Documentation: None	
Education Directly Related to Employment	
1. Describe the services or programs the State includes under the activity.	Current language under 445.024 (F.S.): <i>Education services related to employment for participants 19 years of age or younger.— Education services provided under this paragraph are designed to prepare a participant for employment in an occupation. The agency shall coordinate education services with the school to work activities provided under s.1006.02. Activities provided under this paragraph are restricted to participants 19 years of age or younger who have not completed high school or obtained a high school equivalency diploma.</i> Florida proposes to revise FS 224.024 (i) to align with the federal regulations in the spring 2007 legislative session.
2. Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.	AWI's process requires an RWB staff member to secure documentation for each countable hour of participation prior to entering the hours in the workforce system. The system automatically generates a field to record actual hours completed for every week an activity is open on an individual who is receiving temporary cash assistance and required to participate in the work program. The participation field remains blank until a number from zero to greater than zero is entered in the system. A staff member does not automatically enter scheduled hours, but verifies each hour before manually populating the participation field.
3. Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.	RWB workforce personnel verify hours of actual participation through documentation that includes (but is not limited to) time sheets and daily attendance records or logs submitted to the RWB no less often than every two weeks by the training facility or job site. RWB staff may also verify participation hours by contacting an instructor or other supervisor directly. Attendance information must include the participant's name, the course and instructor name if the training takes place in a training facility, the name of the person certifying attendance and the inclusive dates of attendance. An RWB staff member enters the information in the tracking system and maintains the verification in the case file.
4. Describe the methods of daily supervision that the State will use.	Currently, this activity does not require daily supervision. New guidance will be issued to RWBs to require daily supervision of this activity. Supervision will be certified by the instructor, on-line distance learning system or other authorized staff for each day the individual attends the activity and earns participation hours. The evidence of daily supervision will be a time sheet, attendance log or other form of attendance record signed by an instructor, supervisor or other designated employee of the educational institution. The

Elements	Process Recommended
Education Directly Related to Employment (cont.)	RWB retains the documentation in the case file.
<p>Special Documentation:</p> <p>1. Describe the State’s criteria for “good or satisfactory progress” and how it is documented.</p>	<p>Currently, Florida does not require the provision of “good or satisfactory progress” for hours to be counted in the participation hours.</p> <p>The institution or training facility will determine “good or satisfactory progress” and document it by assessment or instructor observation records and report it to the workforce provider. Because participants are entered in a variety of programs with various institutions/employers and start at different education levels, the educational institution will be required to provide written verification of progress on a regular basis. Prior to entry in a basic education or GED program required for employment, the individual will have a complete assessment by one of the state approved standardized tests, such as the Test for Adult Basic Education (TABE). The individual will be retested periodically and scores compared and recorded as a part of the “good or satisfactory progress” determination.</p> <p>Staff will retain verification of progress in the case file. AWI will monitor case files to review that progress is recorded for participants in this activity.</p>
<p>Satisfactory Attendance at a Secondary School or in a Course of Study Leading to a GED (recipient who has not completed secondary school or received a GED)</p>	
<p>1. Describe the services or programs the State includes under the activity.</p>	<p>Current Statute under 445.024: This activity is called GED preparation and literacy education in Florida’s statute and is defined as <i>Satisfactory attendance at a secondary school or in a course of study leading to a GED, if a participant has not completed secondary school or received such a diploma. English language proficiency training may be included as a part of the education if it is deemed the individual requires such training to complete secondary school or attain a graduate equivalency diploma. To calculate countable hours attributable to education, a participant may earn study credits equal to the number of actual hours spent in formal training per week, but the total number of hours earned for actual hours spent in formal training and studying may not exceed a one and one-half ratio for the week. Countable hours are subject to the restrictions contained 45 C.F.R. s. 261.31.</i></p> <p>Florida proposes to revise FS 445.024 (m) to align with federal regulations in the spring 2007 legislative session.</p>
<p>2. Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.</p>	<p>AWI’s process requires an RWB staff member to secure documentation for each countable hour of participation prior to entering the hours in the workforce system. The system automatically generates a field to record actual hours completed for every week an activity is open on an individual who is receiving temporary cash assistance and required to participate in the work program. The evidence of daily supervision will be a time sheet, attendance log or other form of attendance record signed by an instructor, supervisor or other designated institutional employee. The RWB retains the documentation in the case file.</p>

Elements	Process Recommended
<p>Satisfactory Attendance at a Secondary School...(cont.)</p> <p>3. Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.</p>	<p>RWB workforce personnel verify hours of actual participation through documentation that includes (but is not limited to) time sheets and daily attendance records or logs submitted to the RWB no less often than every two weeks by the training facility or job site. RWB staff may also verify participation hours by contacting an instructor or other supervisor directly. Attendance information must include the participant's name, the course and instructor name if the training takes place in a training facility, the name of the person certifying attendance and the inclusive dates of attendance. An RWB staff member enters the information in the tracking system and maintains the verification in the case file.</p>
<p>4. Describe the methods of daily supervision that the State will use.</p>	<p>Currently, this activity does not require daily supervision.</p> <p>New guidance will be issued to RWBs to require daily supervision of this activity. Supervision will be certified by the instructor, on-line distance learning system or other authorized staff for each day the individual attends the activity and earns participation hours. The evidence of daily supervision will be a time sheet, attendance log or other form of attendance record signed by an instructor, supervisor or other designated institutional employee. The RWB retains the documentation in the case file.</p>
<p>Special Documentation:</p> <p>1. Describe the state's criteria for "good or satisfactory progress" and when and how it is documented.</p>	<p>Currently, Florida does not require the provision of "good or satisfactory progress" for hours to be counted in the participation hours.</p> <p>The institution or training facility will determine "good or satisfactory progress" and document it by assessment or instructor observation records and report it to the workforce provider. Because participants are entered in a variety of programs with various institutions/employers and start at different education levels, the educational institution will be required to provide written verification of progress on a regular basis. Prior to entry in a basic education or GED program required for employment, the individual will have a complete assessment by one of the state approved standardized tests, such as the Test for Adult Basic Education (TABE). The individual will be retested periodically and the scores compared and recorded to serve as part of the "good or satisfactory progress" determination.</p> <p>Staff will retain verification of progress in the case file. AWI will monitor case files to review that progress is recorded for participants in this activity.</p>
<p>Providing Child Care Services</p>	
<p>1. Describe the services or programs the State includes under the activity.</p>	<p>Current language under 445.024 (F.S): <i>Providing childcare services to an individual who is participating in a community service program pursuant to this section.</i></p> <p>Florida proposes to revise FS 445.024 (n) to align with the federal regulations during the spring 2007 legislative session.</p>
<p>2. Describe how the State determines the number of countable hours of participation for the activity. If the State</p>	<p>The required number of hours an individual must be participating in this activity to provide child care services is equal to the number of hours assigned to the participant in a community service program. The calculation for determining those</p>

Elements	Process Recommended
<p>Providing Child Care Services (cont.)</p> <p>uses different methods for different services or programs within the activity, the State should describe each.</p>	<p>hours has been described in the Community Service Program section of the plan.</p>
<p>3. Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.</p>	<p>Hours of actual participation are verified through documentation of hours that may include time sheets and attendance records. The documentation of countable hours for the participant providing child care services will include the signature of the individual completing the community service hours. Workforce staff will communicate with each individual frequently and verify their participation in both activities on a regular basis. The participant in the community service program must provide documentation of hours of child care to the RWB staff no less frequently than every two weeks, for the staff to record the documented hours in the tracking system. The data entry system automatically generates a field to record actual hours completed for every week an activity is open on an individual who is receiving temporary cash assistance and required to participate in the work program. The participation field remains blank until a number from zero to greater than zero is entered in the system. A staff member does not automatically enter scheduled hours, but verifies each hour before manually populating the participation field.</p>
<p>4. Describe the methods of daily supervision that the State will use.</p>	<p>Currently, this activity does not require daily supervision.</p> <p>New guidance will be issued to RWBs to require daily supervision of this activity. Evidence of daily supervision for child care services will be the timesheet or attendance record signed by the participant in the community service program and submitted to the RWB staff. Staff will record hours in the system and maintain the verification in the case file.</p>
<p>Special Documentation:</p> <p>None</p>	

II. Hours Engaged in Work

This section includes two topics: **excused absences**; and **FLSA deeming**.

Excused Absences

Describe the State's excused absence policies for unpaid work activities. This includes its policies for holidays as well as the ten additional excused absences that the State may count in a 12-month period. If the policies vary by work activity, the State should describe how they vary and for which activities.

- i. **Holiday policy for paid work activities**—Florida will credit participation hours for all scheduled hours for any holiday that an employer designates as a “paid holiday” for its employees. If an individual is not paid for the holiday, yet cannot work the holiday due to an employer's observance of the holiday, the individual will be credited hours. RWB staff must maintain documentation of the employer's observance of the holiday in the case file.

- ii. **Holiday policy for unpaid work activities**—Florida will credit participation hours for scheduled hours for holidays observed by the federal or state government as published annually by the state. Observances may include, but are not limited to, **New Year’s, Martin Luther King Jr.’s birthday, President’s Day, Memorial Day, Independence Day, Labor Day, Columbus Day, Veterans’ Day, Thanksgiving, and Christmas.** Florida will also credit participation hours for hours scheduled with a provider (community service, worksite, training, education, etc.) when a facility or business is closed in observance of a holiday.
- iii. **Excused absence for paid activities**—Florida will credit participation hours for scheduled hours a participant misses due to illness for which the individual was paid and/or used sick leave.
- iv. **Excused absence for unpaid hours/activities**—Florida will allow RWBs to excuse up to 10 absences during the federal fiscal year and credit hours towards participation. The 10 days of excused absences may be divided into 20 half days and used for activities requiring less than a full day’s absence, i.e., Dr. appointments, school conferences, etc. Excused absences will be recorded and tracked in the automated system.
- v. **Disaster Excused Absence**—Florida will also credit participation hours for hours scheduled with a provider (community service site, worksite, training or education facility) when a facility, training site or business is closed for a specified period of time necessitated by natural or man-made disasters, such as hurricanes, tornados, floods, fires, earthquakes, terrorist attacks, etc. Documentation to support the crediting of these hours beyond the state or federal holiday calendar or other excused absences will be retained in the case file.

FLSA Deeming

If the State wishes to use the “deeming” provision permitted under 261.31 and 261.32 for work experience or community service programs, describe how the State determines the hours required, including how the monthly TANF grant and food stamp allotment are combined and divided by the appropriate minimum wage to meet the “core” participation requirement. Include a statement certifying that the State has adopted a food stamp workfare program and a limited or “mini” Simplified Food Stamp Program.

The State of Florida has been approved to conduct a mini Simplified Food Stamp Program. RWBs will calculate the scheduled weekly work experience or community service hours by adding the amount of the cash assistance and the food stamp allotment, dividing the resulting figure by the applicable minimum wage and dividing that resulting figure by 4.3 to obtain the minimum required hours $[(\text{cash} + \text{food stamp amounts}) / \text{minimum wage}] / 4.3$. If the maximum allowed hours are completed and verified, RWB staff will enter the appropriate number of core hours as actual hours completed into the system. A case note will explain that the hours were deemed until the OSST system can be updated. Documentation of hours will be retained in the case file.

III. Work Eligible Individual

A “Work Eligible Individual” means an adult or minor head of household receiving assistance under TANF or a separate state program or a non-recipient parent living with a child receiving such assistance (usually a child only case) unless the parent is:

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

The term also excludes:

- a. A parent providing care for a disabled family member living in the home who does not attend school on a full-time basis, provided that the need for such care is supported by medical documentation; and
- b. An individual in a family receiving MOE-funded assistance under an approved Tribal TANF program, unless the State includes the Tribal family calculating work participation rates.

<p>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) a minor parent who is not the head-of-household and not the spouse of the head-of-household, (b) an alien who is ineligible to receive assistance due to his or her immigration status, and (c) at state option, on a case by case basis, a recipient of Supplemental Security Income (SSI) benefits.</p> <p>Describe the state’s procedure for identifying a parent caring for a disabled family member, who may also be excluded from the definition of work-eligible individual. The procedure should define the terms “disabled”, “family member”, and “attending school full time.” This should include a means of ensuring that the need of</p>	<p>Department of Children and Families eligibility staff input data into FLORIDA, the department’s eligibility determination system. The system is programmed to identify all family members associated with the TANF eligible child. The system maintains an extensive database of household/family relationships and assigns a specific eligibility status code to each family member of the TANF/SSP-MOE family. Each month, data for all families receiving ongoing TANF/SSP-MOE assistance will be extracted from the FLORIDA system into a data warehouse. The family case identifier will then be used to identify all family members and caretaker relatives associated with the TANF/SSP-MOE eligible child. Whether or not an individual is designated as work eligible can then be determined for all individuals associated with the TANF/SSP-MOE family by analysis of their age, relationship to the eligible child, marital/head-of-household status, family conditions or receipt of assistance. The following parents will be excluded as work eligible individuals and the method for identifying them is described as follows:</p> <ul style="list-style-type: none"> • Parents who are ineligible aliens—these will be identified and designated as exempt by virtue of a specific eligibility status code currently programmed in FLORIDA. • A minor parent that is not a head-of-household or is not married to a head-of-household—the minor parent payee of the benefits will be identified as the head-of-household. A teen parent who is not married to the payee will be determined as not work eligible. • SSI recipient—these individuals will be identified and designated as exempt by a specific eligibility status code currently programmed in FLORIDA. This status will be confirmed by their receipt of SSI benefits. • Parents caring for a disabled family member in their home. <p>Definitions:</p> <p>Disabled—For the purpose of determining work status of an individual who is caring for a disabled family member, the term, “disabled” is defined as a physical or mental illness, impairment or defect supported by medical evidence and expected to last longer than 30 days. The disability must be severe enough to require</p>
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<p>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 its procedures for determining when the family member is no longer disabled and ensuring that the parent is then identified as a work eligible individual.</p>	<p>the full-time presence of a caregiver. Both the disability and the need for care must be supported by a licensed physician’s statement which includes both a confirmation of a disability and a prognosis of its duration. A review of the disability and the need for full-time care will be conducted, at a minimum, annually for anyone whose disability is expected to exceed one year or more. For anyone whose disability has an expected duration of less than one year, a review will be conducted at the end of the disability period as projected and noted in the physician’s statement.</p> <p>Family member—For the purpose of “caring for a disabled family member” policy, a family member requiring care must be within the 5th degree of kinship through blood or marriage to the caregiver.</p> <p>Full time school attendance—For the purpose of “caring for a disabled family member” policy, full time school attendance shall be as determined by the school or institution.</p> <p>Currently eligibility staff must consult several FLORIDA screens to verify all factors that determine the work status of a person caring for a disabled family member. Discussions are underway regarding the feasibility of adding a field(s) that will indicate verification of all criteria on one screen.</p>
<p>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:</p> <ol style="list-style-type: none"> a. The correct reporting of the Work Participation Status of all adult (or minor child head-of-household) family members, and b. The proper identification of TANF families for inclusion in only the overall work participation rate or the overall and two-parent work participation rates, or exclusion from both the overall and two-parent work participation rates. 	<p>The FLORIDA system automatically determines work participation status by analyzing the age, relationship and marital status of family members, the hours of participation in work activities, receipt of subsidized child care, alien status, and receipt of SSI. Whether or not the family is to be included in the All- family and Two-parent work participation rates is also automatically determined by the case and family member characteristics.</p>
<p>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.</p>	<p>In the previous section describing each work activity, this plan includes detailed processes used by the RWBs to ensure that only countable and verified participation hours are entered in their automated tracking system.</p> <p>The Department of Children and Families extracts data directly from AWI’s OSST System and stores it in the department’s Data Warehouse. The data elements extracted are social security number, activity (service) codes, actual hours and week begin date.</p> <p>The stored programming procedures developed are able to:</p> <ul style="list-style-type: none"> • compile the work participation data items, • control for the rules and requirements that apply to the TANF/SSP-MOE work activities, • compute the average hours across all activities for the month, • perform edit checks and • control for internal consistency and completeness of the work participation data.

In addition the department uses an extensive system of data exchanges with various participant information databases, including the National Directory of New Hires and state wages files, to identify employment hours that can be documented by DCF staff.

IV. Internal Controls

The State is required to describe internal controls that ensure a consistent measurement of the work participation rates. The Work 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.

1. Describe the internal controls designed to ensure established work verification procedures are properly being employed. Such controls may include supervisory guidance, policy directives, and staff training plans, as well as quality assurance processes such as monitoring procedures to ensure adherence to procedures by staff, providers, and contractors.

For example: to ensure the State is identifying all work eligible individuals, a State may periodically check the disability status of a family member who is temporarily disabled, as the parent caring for the disabled family member would become a work-eligible individual once the family member is no longer disabled.

a) **Workforce programmatic monitoring:** Each year, AWI conducts a desk review and/or on-site review of a sample of cases. On-site reviews examine performance, as well as other factors. AWI performs On-site reviews on a cyclical basis to ensure every RWB is monitored every other year, at a minimum. The agency conducts desk reviews annually. In the desk audit, system entries are reviewed. Both the on-site monitoring and desk audit include the following review elements:

- o Compliance with work activity definitions,
- o Documentation of hours, and
- o Verification of supervision requirements.

In both the desk audit and the on-site monitoring visit, a random sample of cases is reviewed based on the total cases in the workforce data entry system. The sample is determined by a 12% confidence interval and (no less than) an 80% confidence level.

b) The workforce program will develop and distribute guidance or policy regarding work activity definitions, work activity supervision requirements, data entry requirements and documentation requirements.

c) Workforce will request legislative changes to align work activity definitions as described in Florida Statute 445.024 with the federal regulations.

d) AWI provides workforce training throughout the state once a year at a minimum. The agency also provides technical assistance through a variety of methods: on-site visits, monitoring visits, performance improvement plan visits, conferences, conference calls, and on-line training (web based).

DCF also conducts several levels of monitoring to insure that it submits complete and accurate data to HHS. *Tier 1, Service Center Review:* Designated reviewers sample each eligibility specialist's case work as soon as possible after a task is completed. Approximately 1,000 TANF/SSP-MOE randomly selected cases are reviewed each month. All cases are reviewed for accuracy of work program participation. Findings are maintained in the on-line Quality Management System. This system also includes an on-line instructional guide for the reviewer's use in determining accuracy in the case.

	<p><i>Tier 2, District Validation:</i> District level staff members validate the work of each designated reviewer, reviewing three randomly selected cases per reviewer each month. Validations include a review of the accuracy of work program participation issues. Findings are maintained in the on-line Quality Management System.</p> <p><i>Tier 3, State Level Review:</i> State level monitors review a randomly selected sample of TANF/SSP-MOE cases for accuracy at each annual district review. The review includes accuracy of work program participation in each case.</p> <p>The Tier 3 Review instructions state that work program policy must be correctly applied to all individuals in the case. Individuals in the case must be work registered when required. Any work sanction must be correctly applied or correctly lifted as requested by the workforce agency. At a minimum, FLORIDA electronic screens for recording work referral or exemption status will be reviewed.</p> <p>Work program participation accuracy rates for each district reviewed are maintained by the Quality Assurance Office.</p> <p><i>Quality Control:</i> The Department's Quality Control Office conducts desk reviews of 1200 (a statistically valid sample size) randomly selected TANF/SSP-MOE cases annually. This office is independent of the program policy and monitoring office. Reviews include determination of eligibility and correct assignment as a mandatory or exempt work participant.</p>
<p>2. Describe the internal controls to control for data errors, including transcription and coding errors, data omissions, computational errors, and compilation errors. For example, a State might automatically review the case record of each work eligible individual who's reported average weekly hours of participation are unusually high by examining the documentation used to support those hours.</p>	<p>Prior to submitting the TANF/SSP-MOE Data Reports, DCF MIS staff examines the data for inconsistencies including an examination of hours reported. The work eligible individuals whose reported average weekly hours of participation are unusually high (more than 70 hours per week) will be identified through data queries, compiled into a list and referred back to AWI for further documentation from field service provider staff.</p>
<p>3. Describe the checks used to isolate electronic systems and programming errors and the steps to ensure that all work participation report items are internally consistent. For example, a State might obtain the raw data (prior to input in to an automated data processing system) for a sample of work-eligible individuals and determine manually the average weekly hours of participation for each work activity for a month and compare that results that what the State actually reported to HHS.</p>	<p>DCF produces the TANF/SSP MOE Data Report using Microsoft SQL from a Data Warehouse. The Data Warehouse contains data extracted weekly, monthly and quarterly from FLORIDA and OSST. DCF also receives data files from Child Support Enforcement for child support payments, the Partnership for School Readiness for subsidized child care and from Family Safety for a listing of Foster Care and Board payments. These files are imported into tables in the Data Warehouse. The following tables house the data: Family, Adult and Child and Service Activity. These tables contain information on all TANF/SSP MOE families reported on the TANF/SSP MOE Data reports since 1996. Programming has been developed and will be refined to produce the data reports from these files. Because of the programming specifications for DCF's automated process, many data entry, computational and compilation errors are avoided.</p> <p>All programming used to build the TANF SSP/MOE Data Report will undergo vigorous and thorough testing.</p>

	<p>The testing will include manual checks to the data posted against the source data from OSST, FLORIDA and Child Support Enforcement records to ensure that all report items are internally consistent.</p> <p>In addition the state will query some 20 data elements for consistency including family counts, person counts, number of families receiving subsidized child care, number of families receiving food stamps and the average benefit amount, summary of TANF/ SSP-MOE benefits, family affiliation codes, and counts of work participation statuses. The data from these queries will be compared to the previous report month's data and any count not within a +/- 5% of the previous month's counts will be manually verified. The files will also undergo the established federal edit checks and any discrepancies will be resolved prior to submission.</p>
<p>4. Describe any sampling and estimation techniques employed in data validation. The Work Verification Plan should document the soundness of all statistical procedures utilized in the verification process. All estimation techniques must be reasonable and fully described in the plan. For estimates based on sampling or other statistical techniques, the plan must contain, as appropriate, the step-by-step computations of precision, affirming that the produced estimates are within statistically acceptable levels of reliability and validity.</p>	<p>To ensure submission of a complete and accurate TANF/SSP-MOE Data Report, a random sampling of family and person data will be obtained to verify manually that the data elements have been populated correctly. This sample is further discussed in next section.</p>

V. Verification of Other Data Used in Calculating the Work Participation Rates-under the “complete and accurate” standard for data reporting, States should validate all data submitted in its TANF Data Report and, if applicable, the SSP-MOE Data Report:

The Work Verification Plan should contain the procedures needed to establish that the State has the capacity to breakout the 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 childcare, age of child, age of adult or teen parent, number of months under a sanction, adult or teen parent with satisfactory attendance, and families with a disabled family member (adult or child).

<p>1. For each element listed below, describe the State's data validation procedures to ensure “complete and accurate” data reporting.</p> <ol style="list-style-type: none"> a. Reporting Month b. Stratum c. Case Number d. Disposition e. Type of family for work participation f. Amount of Food Stamps Assistance g. Receives subsidized childcare h. Amounts of TANF (and SSP-MOE) assistance i. Family affiliation code j. Non-custodial parent indicator 	<p>As previously stated, DCF's data section will compile the TANF/SSP-MOE Data Report electronically. A random sample of families for each report month will be pulled and their data will be manually compared to the original sources of data. Also any fields that were automatically calculated, such as average hours per week, will be manually verified. Since the department will be using a tested program to compile the reports, the sample size will be at a 95% confidence level with a 15% confidence interval. To determine sample cases, a random number will be generated for each TANF/SSP-MOE family. The families will then be sorted by their random number and the number of records required by sample size will be identified.</p> <p>Data elements to easily identify case characteristics will be a part of a family's or individual's monthly record. The files currently contain the following fields: amount of subsidized child care, age of youngest child, family type, teen parent indicator, sanction availability. The following data elements will be added and populated when applicable: personal identifier of the disabled family member, relationship and date of birth.</p>
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- k. Date of birth (adult)
- l. Relationship to head of household
- m. Parent with minor child
- n. Work-eligible individual indicator
- o. Date of birth (child)

The following chart describes the data element, the source of the data and how the data will be validated.

Data Element	Source	How Validated
Report Month	Automatically populated	Report Month Sample
Stratum	Florida does not use	NA
Case Number	Automatically populated built form our case number	Report Month Sample
Disposition	Automatically populated if family does not receive any benefits	Report Month Sample
Family Type	Automatically populated using family characteristics.	Report Month Sample
Amount of Food Stamp Assistance	FLORIDA data extracts	Report Month Sample
Subsidized Child Care	Populated by matching SSN of Child against files received from outside source.	Report Month Sample and record counts
TANF/SSP_MOE Assistance	FLORIDA extracts. Foster care board payments--populated from files received from outside source	Report Month Sample and record counts
Non-Custodial Parent Indicator	Florida does not provide assistance to Non-Custodial parents	NA
Date of Birth (Adults)	FLORIDA data extract	Monitoring of case files, Report Month Sample
Relationship To Head of Household	Automatically populated using FLORIDA data extracts.	Monitoring of case files and Report Month Sample
Parent With Minor Child	FLORIDA data extracts and analysis of relationships.	Report Month Sample
Work Eligible Indicator	FLORIDA data extracts and analysis of marital status, date of births.	Report Month Sample
Date of Birth (Child)	FLORIDA data extract	Monitoring of case files and Report Month Sample

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

DCF electronically compiles TANF/SSP-MOE Data Reports. Most data inconsistencies are avoided by using tested programmatic logic. The department conducts continuous evaluations to determine the need for additional programming edits.

Work Participation Status:

<p>1. Describe the State's procedures for ensuring that a family is not disregarded from the work participation rate for more than 12 months per lifetime based on a single custodial parent with a child less than one year.</p>	<p>DCF's FLORIDA system maintains a file of all work eligible individuals who have been disregarded from work participation due to being a single custodial parent with a child less than one year old. The file contains their unique personal identifier as well as the report month that they were disregarded. Prior to disregarding a person for this reason, DCF references the file to ensure that the person has not been disregarded for more than 12 months.</p>
<p>2. Describe the State's procedures to ensure that a family is not disregarded from the work participation rate for more than 3 months in any period of twelve consecutive months based on a work-eligible refusal to participate in work.</p>	<p>DCF's FLORIDA system maintains a file of work eligible individuals who were disregarded from work participation due to refusal to participate in work activities. The file contains the unique personal identifier and the report month that the disregard was used. Before disregarding an individual for refusal to participate in work activities, DCF references this file to ensure that an individual is not disregarded for more than three months in a 12 month period.</p>
<p>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 the age of six.</p>	<p>Before an individual is coded as engaged in work activities when they are participating at the 20 hours but less than 30 hours level, DCF analyzes the age of the youngest child to ensure that the youngest child is less than six years old.</p>

Certifications:

1. Florida's two partner agencies for administering the eligibility determination and work activities requirements of TANF confirm that each agency will maintain all pertinent findings produced through their 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.
2. Florida certifies that the plan includes all the information required by 261.62(b) and that it accurately reflects the procedures under which Florida is operating.