

Idaho Work Verification Plan September 2008

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OVERVIEW

In Idaho, the TANF cash assistance program is known as Temporary Assistance for Families in Idaho (TAFI). The goals of TAFI are to employ participants and provide support both personal and family responsibility. This focus requires more than government alone can or should provide. This program requires relationships where participants, families, local communities and employers work together to help participants obtain employment and achieve self-reliance.

TAFI:

- Has a 24-month lifetime limit (with some extensions for hardship),
- Pays \$309 per month regardless of household size,
- Imposes full family sanction,
- Requires all participants to participate in something (including federally countable or other activities),
- Includes alcohol and substance abuse screening,
- Is available only to needy families with children (A family is considered needy if the household's countable income is below 32% of current federal poverty level),
- In addition to the \$309 per month, supportive service funds are available to assist participants to find or retain work,
- Provides enhanced work services to families receiving cash assistance, and
- Two-parent families receive all TAFI services through a separate state-funded program that is not counted as MOE.

1. DEFINITIONS

PARTICIPANT – Individuals who apply or receive benefits in Idaho from the Department of Health and Welfare.

EWS (Enhanced Work Services) – Contracted employment and training services designed to help TAFI mandatory work participants gain skills, education, and experience to locate and maintain employment.

PRC (Personal Responsibility Contract) – Negotiated agreements between applicants and case workers. It serves as clear guidance to participants by outlining participation responsibilities and expectations. The PRC is modified jointly by participants and contractors.

TANF Data Reporting System – Tracks work-eligible adults' activities and participation, and calculates activity hours. This system provides the data for the TANF 199 Report.

TANF 199 REPORT – Fills the function of the federally required TANF data report for the State of Idaho. This data is transmitted to ACF quarterly.

TAFI Participation Report – A report from the TANF Data Reporting system showing the number of TAFI recipients, the type of family (one or two parent), the hours they have participated in a specified set of work activities, and whether they passed or failed the required minimum number of work hours for a month. An automated work participation and tracking system generates this report.

IBES (Idaho Benefit Eligibility System) – Automated system that processes Idaho's benefit eligibility, captures federally mandated work participation hours, and all related reporting data.

TAFI (Temporary **A**ssistance for **F**amilies in **I**daho) – A time-limited (24 months lifetime) temporary cash assistance program for eligible families who demonstrate efforts towards self-reliance. TAFI also includes cash assistance for children who live with a caretaker relative that is not a parent that is not time-limited. All adult household members receiving TAFI, including children ages 16 -18 who are not attending school, are required to participate in work activities.

Two-Parent TAFI Program – Idaho has a separate State-funded program serving two parent families that is not counted towards Maintenance of Effort funds.

CERM (**C**ontracts and **E**xternal **R**esource **M**anagement) – A Department contract monitoring team for all work and training contracts for compliance and performance standards.

QST (Quality Support Team) – A group of individuals who conduct quality assurance case reviews and provide policy clarification for staff.

SRS (**S**ELF **R**ELIANCE **S**PECIALIST) – A State case manager who conducts eligibility determination for benefit programs such as Food Stamps, TAFI, Medicaid, and AABD.

I. COUNTABLE WORK ACTIVITIES

A. Unsubsidized Employment:

In Idaho, unsubsidized employment means full- or part-time employment in the public or private sector that is not subsidized by TANF or any other public program.

The State counts each hour worked for an employer and each hour of paid leave allowed by the employer (vacation or holidays) as an hour of participation. For self-employment, the State counts the individual's self-employment income (gross income less business expenses) divided by the Federal minimum wage to determine the number of hours.

Hours of employment are verified by the following types of documentation: paystubs, signed letters from the employer, work verification forms, employer verifications, signed timesheets, and online verification services, such as The Work Number, etc. Self-employed individuals complete self-employment verification forms when reporting self employment income.

Eligibility is determined using the net income (deducting business expenses from gross profits). The number of countable hours is determined by using the net income divided by the federal minimum wage. We also require that self-employed individuals provide additional documentation to substantiate their self-employment activities. A spot check is conducted monthly by the contractor to confirm goods or service were delivered. This spot check consists of randomly selected customers which give us a 90% degree of statistical confidence. Hours of employment are not projected forward, and documentation of work hours is retained in each individual case record for at least 3 years.

Employers provide daily supervision.

B. Subsidized Private Sector Employment:

In Idaho, subsidized private sector employment means employment in the private sector where employers receive subsidies from public funds to offset some or all of the wages and costs of employing a recipient. This program provides short term placements and pays prevailing wages.

Employment hours are reported as subsidized employment. Unpaid classroom training are reported under the appropriate educational activity.

Verification procedures are the same as unsubsidized employment. Hours of employment are not projected forward and documentation of work hours is retained in each individual case record for at least 3 years.

Employers provide daily supervision.

C. Subsidized Public Sector Employment:

In Idaho, subsidized public sector employment means employment in the public sector where employers receive subsidies from public funds to offset some or all of the wages and costs of employing a recipient. This employment allows individuals to develop work maturity skills which enhance their ability to find unsubsidized employment.

Hours are counted the same as unsubsidized employment.

Verification procedures are the same as unsubsidized employment. Hours of employment are not projected forward and documentation of work hours is retained in each individual case record for at least 3 years.

Employers provide daily supervision.

D. Work Experience:

In Idaho, work experience is unpaid, short-term, pre-employment work where individuals gain work experience based on a skills assessment. It also includes work experience through another agency's program, such as vocational rehabilitation or probation and parole which is not community service. Work experience provides opportunities to improve the employability of those who cannot find unsubsidized employment through general skills, training, knowledge, and work habits necessary to obtain employment.

Individuals participating in Work Experience are considered to be an "employee" under the Fair Labor Standards Act (FLSA) and must be compensated at the applicable minimum wage. An individual's work experience hours are calculated by dividing the TAFI benefit and the value of received Food Stamps by the higher of the Federal or State minimum wage. Core hours deemed when necessary. Idaho operates a Simplified Food Stamp Program for TANF recipients, allowing us to combine the value of TANF and food stamp benefits to determine the maximum number of hours the individual is able to participate in work experience.

Time sheets signed by the work experience site supervisor verifying participation are submitted weekly and maintained in the case record for least 3 years. The State counts each hour worked as an hour of participation.

This activity is supervised by an employer, work site sponsor, or other responsible party on an ongoing basis at least daily. A signed Memorandum of Agreement between the Department and the work site provides guidance and defines the responsibilities of the work site while allowing the individual time to attend class, job interviews, and seek employment. These activities are not counted as work experience, but may be counted under other activities.

E. On-the-Job-Training (OJT):

In Idaho, OJT means public or private sector training given to paid employees while engaging in productive work and providing knowledge and skills essential to the full and adequate performance on the job. Theoretically, Work Force Investment Act funding supports OJT activities in Idaho. To date, we have no OJT sites, but if and when we do, training plans will be part of the activity.

Hours would be counted the same as unsubsidized employment.

Verification procedures would be the same as unsubsidized employment. Hours of employment will not be projected forward and documentation of hours of activity will be retained in each individual case record for at least 3 years.

This activity will be supervised by an employer, work site sponsor, or other responsible party on an ongoing basis at least daily.

F. Job Search and Job Readiness Assistance:

In Idaho, job search means the act of seeking for a job, researching the job market, researching potential employers, making contact with potential employers, applying for vacancies, and interviewing for jobs. Job search also includes internet search hours which may occur at Enhanced Work Services (EWS) offices or in a private home.

Job readiness means preparation to seek or obtain employment including life-skills training, short-term substance abuse treatment, and mental health treatment or rehabilitation activities for those who are otherwise employable. A qualified State-licensed medical or mental health professional certifies substance abuse treatment, mental health treatment, or rehabilitation activity is necessary for the individual to obtain employment. Job readiness also includes work preparation activities such as assessments, classes, workshops, resume and/or job application preparation, interviewing skills, how to keep a job, budgeting, life skills training, or setting up a business.

Countable hours of participation are described in the Personal Responsibility Contract (PRC) and are based on the activity hours completed. The State standard is 6 weeks (120 or 180 hours) of job search and job readiness reported in a fiscal year. EWS contractors ask permission to allow a person to be in job search and work readiness for more than 6 weeks (120 or 180 hours). They are given permission as long as Idaho is considered a needy state. Idaho is classified as a needy state, and under this classification can count job search and job readiness for 12 weeks (240 or 360 hours) with no more that 4 consecutive weeks. The State uses the 12 week (240 or 360 Hrs) option when necessary.

The State also assures that no more than 4 consecutive weeks of job search and job readiness occurs. Any hours of job search and job readiness in a week automatically counts as a full week of job search. For each week where work-eligible individuals exceed the 4 consecutive weeks, a "0" is used as the number of hours in calculating the average number of hours per week of job search and job readiness, even if he or she is engaged in those activities. Additional participation in job search or job readiness above the allowed number of weeks will be coded in "other." Idaho measures participation in this activity for the preceding 12 month period and tracks participation by hours and weeks.

The TANF Data Reporting System, Idaho's automated participation reporting and tracking system, currently tracks the annual rolling time limit per participant. The 4 consecutive week job search limitation is tracked by EWS contractors and recorded in participant files. Hours of participation are verified by daily attendance and daily attendance records. Hours in job readiness classes or mental health services are documented with attendance records. For job search, each participant keeps a daily record of time spent on all employment contacts, whether by internet, in person, or by phone. This log is turned in to the case manager weekly. The case manager conducts random reviews that provide statistically valid random samples that give us 90% validity, and follows up with potential employers to ensure accuracy of the logs. Hours that are found to lack validity are not counted toward the participant's hours of participation. Documentation of hours of activity are retained in each individual case record for at least 3 years.

Daily supervision is conducted through collection of weekly time sheets, attendance records, or participant daily log of activities. The documentation consists of copies of job contact information, applications submitted, addresses, phone numbers, and names of job contacts. In-person contact between participants and case managers or other service providers at least weekly. Supervisors or case managers are always available for advice between regularly scheduled contacts.

G. Community Service Programs:

Community service programs are structured programs with embedded activities in which TANF recipients perform work for the direct benefit of the community under the auspices of public or non-profit organizations. Our community services programs are limited to projects that serve useful community purposes in fields such as health, social services, environmental protection, education, urban and rural redevelopment, welfare, recreation, public facilities, public safety and child care. They are designed to improve the employability of recipients not otherwise able to obtain employment. Assessments of participants' prior training, experience, and skills are used to make community service assignments. Unstructured and unsupervised activities, such as helping a neighbor or friend and foster parenting, are excluded activities.

If individuals participating in Community Service are considered employees under the Fair Labor Standards Act (FLSA), individuals are compensated at the applicable minimum wage. An individual's work experience hours are calculated by dividing the TAFI benefit and the value of received Food Stamps by the higher of the Federal or State minimum wage. Core hours deemed when necessary.

Time sheets signed by work experience site supervisors verifying participation are submitted weekly and maintained in the case record for at least 3 years.

This activity is supervised by an employer, work site sponsor, or other responsible party on an ongoing basis at least daily. A signed Memorandum of Agreement between the Department and the work site provides guidance and defines the responsibilities of the work site.

H. Vocational Education Training (not to exceed 12 months for any individual in a lifetime):

In Idaho, Vocational Education Training means organized educational programs directly related to the preparation of individuals for re-employment in current or emerging occupations requiring training other than a baccalaureate or advanced degree. These educational opportunities are provided by Community Colleges, Vocational Technical Institutes, and other programs.

Necessary basic and remedial education and limited-duration English as a Second Language (ESL) training are a regular part of Idaho's vocational education training when the lack of basic education or limited English proficiency are barriers to the participant. The State ensures the necessity through an assessment of the individual's skills, experiences, and work goals. A statement from the vocational education provider indicates participant enrollment in approved activities (i.e., necessary vocational training or ESL instruction) for no more than five hours per week, and is kept with the case files. For work-eligible individuals exceeding the 12 month lifetime limit, a "0" is entered as the average number of hours per week of participation in vocational education training even if he or she is engaged in these activities. Additional participation in vocational educational training may be coded in "other."

Countable hours are based on actual class time, time spent in supervised study halls, and includes up to one hour of unsupervised homework for each hour of class time.

Actual hours are verified through class and study hall attendance records signed by the instructor or study hall monitor. Total homework does not exceed what is allowed or prescribed by the educational program. Documentation is collected weekly and retained in each individual case record for at least 3 years.

Community colleges, university vocational institutions, and other education and training organizations provide vocational education training. Individuals participating in actual classes and online classes receive daily supervision from instructors and study hall monitors.

Idaho's TANF data reporting system is programmed to track the 12-month restriction on this activity. A full month is counted regardless of how many vocational education hours are used in that month. The system does not count hours keyed in vocational education if the individual has exceeded the 12 month limit. The system does not count vocational education hours keyed if they meet participation rate in another countable activity to preserve valuable vocational training hours.

I. Job Skills Training Directly Related to Employment:

In Idaho, job skills training directly related to employment is training or education for job skills required by an employer to provide an individual with the ability to obtain employment or to advance or adapt to the changing demands of the workplace.

The countable hours under this activity are based on actual class time and time spent in supervised study halls. The job skill training has been identified by the employer and the individual to meet the need of the employer or the demand of the workplace.

Actual hours are verified through class and study hall attendance records signed by instructors or study hall monitors.

Training specific to the identified skill is provided by community colleges and university vocational institutions, private providers.

J. Education Directly Related to Employment:

In Idaho, education directly related to employment in the case of recipients who have not received a high school diploma or a certificate of high school equivalency would be education related to a specific job, occupation or job offer.

The countable hours under this activity are based on actual class time; time spent in supervised study halls.

Actual hours are verified through the class and study hall attendance records signed by the instructor or study hall monitor.

High schools, alternate high schools, community colleges and university vocational institutions within Idaho or its surrounding borders provide courses of study that lead to a certificate of general equivalence or high school diploma.

K. Satisfactory attendance at secondary school, or in a course of study leading to a certificate of general equivalence, when recipients have not completed secondary school or received such a certificate:

This activity includes regular attendance, in accordance with the requirements of the secondary school or course of study, at a secondary school, or in a course of study leading to at certificate of general equivalence, when recipients have not completed secondary school or received such a certificate.

The countable hours under this activity are based on actual class time and time spent in supervised study halls.

Actual hours are verified through the class and study hall attendance records signed by the instructor or study hall monitor.

Alternate high schools, community colleges, and university vocational institutions within Idaho or its surrounding borders provide courses of study that lead to a certificate of general equivalence.

L. Providing child care services to an individual who is participating in a community service program:

This activity is not used in Idaho as a work component.

II. HOURS ENGAGED IN WORK

Excused Absences

Idaho's excused absence policy provides for excused absences in the following instances:

- The following holidays will be observed: Christmas, New Years Day, Martin Luther King Day, Presidents Day, Veterans Day, Columbus Day, Labor Day, Memorial Day, Independence Day, and Thanksgiving Day.
- Up to 80 hours for individuals in unpaid work activities in the preceding 12 month period with no more than 2 days per month (16 hrs). Individuals in paid work activities are allowed sick and vacation leave provided by employers.
- Excused absences must occur during regularly-scheduled unpaid activities, and may be used for illness, doctor's appointments, family emergencies, and other emergencies (such as transportation problems), and only for the hours an individual was scheduled to participate on a given day.
- Tracking use of the excused absences is conducted by the Enhanced Work Services contractor's
 case managers and documented in the case file with time sheets. Contract monitoring will review
 these files for correct use of excused absences.

FLSA Deeming

Idaho operates a mini Simplified Food Stamp Program and provides education and training services to Food Stamps recipients.

The State of Idaho uses the deeming provision permitted at 261.31 and 261.32 for work experience and community service programs. Enhanced Work Services Contractors determine the maximum hours of participation for Work Experience and Community Services sites by using cash assistance benefit amounts and Food Stamps value divided by the higher of the federal or state minimum wage. Idaho deems core hours when necessary. The contractor reviews pay history the first of each month for changes in benefit allotment which may affect the number of hours the individual may participate in Community Service sites. If the number of available hours falls short of the required core participation hours, the contractor deems the additional core hours necessary to meet the required work participation and documents the hours deemed by narrating the number of core hours deemed in IBES.

III. WORK-ELIGIBLE INDIVIDUALS

In Idaho, work-eligible individuals are adults (or minor child heads-of-household) receiving TAFI assistance or non-recipient parents living with children receiving such assistance (usually a child-only case), unless:

- The parent is an alien who is ineligible to receive assistance due to his or her immigration status,
- The parent is a minor parent and is not head-of-household, or
- The parent receives SSI.

The term also excludes:

 Parents who provide care for disabled family members living in the home who do not attend school on a full time basis, provided that the need for such care is supported by medical documentation.

"Disabled" means need for care is supported by medical documentation from certified medical or mental health professionals such as licensed physicians, physician assistants, nurse practitioners, or licensed clinicians. The professional providing documentation must practice in a specialty related to the disabling condition (for example, an ObGyn may not provide documentation regarding a disabling condition related to knee problems; that would have to be provided by an Orthopedist).

"Family member" includes any TAFI household member who is a relative.

"Attending school on a full-time basis" means being enrolled in secondary or postsecondary education for 9 or more credit hours, or as defined by the school.

 Recipients of Supplemental Security Income (SSI) benefits, determined at State option on a caseby-case basis.

Individuals in a family receiving MOE-funded assistance under approved Tribal TANF program in its participation rate.

1. Determining Work Eligibility

Work-eligible individuals are identified during the eligibility determination process and the negotiation of the PRC. All adult HH members are initially identified in IBES as work-eligible, unless they meet an exemption category described above. Documentation is requested to verify exemptions from work-eligible status.

Additionally, the EWS contractor assesses the family to determine appropriate work activities. During this assessment, the contractor learns of disabled family members and constraints that would prohibit the adult's ability to participate in work activities. Verification of the disability status is requested and, once received; the disability status is keyed in IBES by the contractor.

2. Verification Procedures for Ensuring Reporting Accuracy for Work-Eligible Individuals on TANF Data Reports

Case workers and contractors have access to IBES and input information to identify ineligible aliens, disabled family members, excluded adults, and work-mandatory individuals. In Idaho, all adults receiving TAFI are mandatory for participation in work activities. When families apply for TAFI, we determine which adults are work-eligible. An electronic EWS referral is created for each work-eligible individual. IBES captures case information, disability status, availability of child care, work activity, number of hours, and number of weeks in an activity, and total hours.

Preliminary participation rate reports are released at the middle of the month to identify individuals who were incorrectly coded as work-eligible individuals, or individuals with "0" hours keyed. EWS contractors make any necessary corrections. The report also shows which participants have not met the required work hours and identifies the number of hours keyed for each activity. By reviewing this report in the middle of the month, there is time to improve work participation performance by identifying missing activity.

Final reports are released at the end of the month. Final reports contain work participation data that is transmitted via the TANF Data Report. The EWS contractor team reviews reports again to identify performance improvement strategies and to identify coding errors. Report results are used to measure contractor performance. Programming removes the two-parent families participating in a Two-Parent TAFI Program from the TANF Data Report; however, these families are accounted for so the State can accurately track the activities and efforts to move these families off cash assistance.

If adult work-eligible individuals or parents are not eligible under TAFI eligibility rules, the whole family is not eligible for cash assistance. We evaluate each child-only case to determine if there are non-recipient work-eligible parents in the household. If there are, parents are required to participate, or the family will not be eligible for TAFI. The following are not eligible for cash assistance:

- Adults receiving SSI,
- Fleeing felons, and
- Drug convicted felons who are not in compliance with their probation.

Two processes exist to ensure the proper identification of TAFI families for inclusion or exclusion in work participation rates.

- Each quarter, the CERM team reviews a random sample of TAFI cases to assure that appropriate families are included in work participation and appropriate documentation is on file that verifies family status and work participation hours. The sample includes each month of the quarter.
- Each quarter, Department staff review TANF Data Report error flags and discrepancies received from ACF. The purpose of this review is two-fold. First, to correct individual cases and retransmit them. Secondly, to identify transmission errors or errors in the TANF 199 Report that requires corrective programming to prevent future errors or corrective action with staff because of keying errors.

3. Procedures Ensuring Data Accuracy

Quarterly monitoring and case reviews assure each individual receiving TAFI is accurately entered into the IBES system, hours are properly tracked, and hours are accurately reported to ACF to include only hours of participation that meet Federal definitions of work-eligible activities.

- Idaho's TANF Data Report is programmed to accurately count federally defined work participation, duration limits for certain work-eligible activities, and required number of hours for each family type.
- The CERM team reviews a random sample of TAFI cases each quarter to ensure appropriate families are included in work participation, and that appropriate documentation is on file that verifies work participation keyed in IBES.
- Department staff reviews TANF Data Report error flags and discrepancies received from ACF each quarter. The purpose of this review is two-fold: first, to correct individual cases and retransmit them; second, to identify transmission errors or errors in the TANF 199 Report that require corrective programming to prevent future errors. The Department identifies actions to correct future keying errors or misapplication of policy.

IV. INTERNAL CONTROLS

The TAFI Process

In Idaho, State Self-Reliance Specialists (SRS) conduct eligibility determination for TAFI applicants, approve one-time payments, and take action to issue benefits, apply sanctions, and close cases. These activities are considered core eligibility activities. Case management for TAFI is conducted by the State's Enhanced Work Services (EWS) Contractor. Case management consists of initial screening, substance abuse screening, family assessment, PRC negotiation, diversion, work search, work readiness, issuance of supportive services and transitional services, daily supervision, assignment and documentation of activities, and keying activity hours. The EWS contractor notifies the SRS via an electronic alert when participants need to be sanctioned or closed.

Idaho implemented a same-day service system providing TAFI applicants the opportunity to have an eligibility interview the day they apply for assistance. Applicants meet with a decision maker (SRS) who provides them with program eligibility information which allows them to make an informed decision regarding which programs to apply for. This process also minimizes the number of times customers have to contact the Department before eligibility decisions are made.

Individuals apply for TAFI (and usually Food Stamps).

TAFI applicants are registered in IBES and complete an interview with an SRS. During the interview with customers, the SRS obtains available verifications via electronic interfaces, telephone, fax, internet sites, etc., rather than placing the burden solely on applicants. If all elements of eligibility cannot be verified by the SRS using one of the methods listed, applicants are given a list of any remaining verifications needed.

At the time of the initial interview, applicants are required to sign a EWS TAFI Referral Notice. This notice includes Enhanced Work Services contact information, consequences for failure to comply with the Personal Responsibility Contract (PRC), a statement that TAFI benefits can be denied or sanctioned without further notice if they fail to contact the contractor, and the requirement to attend orientation and participate in required activities.

An Enhanced Work Service Referral is keyed in IBES for each work-mandatory adult in the TAFI household. The referral is sent to the EWS contractor to notify them of the new TAFI applicant.

If TAFI applicants fail to contact the EWS contactor and attend their scheduled orientation, the EWS contractor notifies the Department via the IBES system and the TAFI application is denied.

If the TAFI applicant attends the orientation, signs the PRC and meets all other application requirements the EWS worker notifies the Department via IBES that the TAFI benefits can be approved.

If all other financial and non-financial verifications have been provided to the Department, the TAFI benefit is approved and initial payment is released to the participant.

The EWS contractor provides ongoing case management, meeting with the participant at least weekly, providing daily supervision, when necessary. The EWS contractor collects documentation of hourly participation in activities, keys participation hours, journals participant progress in IBES, and revises the PRC, when necessary.

The EWS contractor reviews monthly TAFI Participation Rate reports to ensure accurate recording of activity hours and accurate documentation of hours. This report also identifies individuals that have not had an Enhanced Work Services Referral keyed, indicating they are mandatory for participation in work

programs. The contractor then takes the appropriate action to get the case corrected and engage the participant in appropriate activities.

Assurance of Proper Implementation of Division Policy and Procedures

In order to assure proper implementation of Division policy and procedures, the Division of Welfare provides training, curriculum development, policy development, and quality assurance for state staff. Program managers, program specialists, welfare training specialists, process engineers, and business analysts develop policy and procedures. These teams work together to develop orientation materials, curriculum, and updates to the online handbooks and process manuals. Policy and process changes are implemented through a highly flexible system that is supported by a statewide training unit and video technology. For complex policy changes, face-to-face training is scheduled. Supervisors are expected to provide staff with guidance on the implementation of the policy and process changes. Each training is followed by QA case reviews or field observations which provide assurance that the changes are implemented appropriately in the field.

Assurance of Contract Compliance

The CERM Team manages contracts for the Division and requires contractor adherence to strict performance standards. Contract management includes: providing input in contract development, quarterly contract monitoring, case reviews, contractor training on new policy, and technical assistance. Technical assistance is provided daily, when necessary. Members of this team participate in policy and procedural change training in order for them to capture changes that need to be included in contractor training or a new scope of work.

CERM ensures participation hours are appropriately documented in contractor files, documented work participation is properly coded to the correct activity, documented activities coded as work-eligible are correct, and documentation supports the information in IBES and the billing system. This includes determining work-eligible individuals in families. Monthly Participation Reports containing hours keyed per work-mandatory participant are received by the contractor, and reviewed by CERM, program specialists, and the program manager. Monitoring keyed hours helps us monitor the participation rate. When systemic data validates problems uncovered during quarterly monitoring, monthly monitoring is initiated. If improvement is not met during monthly monitoring, targeted case reviews are conducted and corrected participation reports are submitted.

Internal Controls to Manage Data Errors

Quarterly contract monitoring conducted by CERM includes reviews of a random sample of participant files for each month of the quarter. The CERM team reviews these cases to ensure contractor compliance and performance. Because CERM checks case records against IBES, they capture coding, transcription, data omissions, and compilation errors that may have been the result of keying by State employees or contractors. Contact is made with employers and work site sponsors to corroborate the recorded activity hours. The State has a Quality Assurance Team consisting of 6 individuals who conduct case reviews and provide regular policy interpretation for staff. This team conducts regular random sampled case reviews. They provide a variety of reviews, pre-release reviews, post-release reviews, and second level reviews of supervisor's reviews. The results of these reviews are entered into a case review tracking and reporting system called Q5i. We developed review profiles and design reports for the TAFI (TANF) case reviews completed by CERM. These reviews are entered into the quality assurance database, Q5i.

Checks to Isolate Electronic System and Programming Errors

The quarterly random TAFI case reviews conducted by CERM ensure information in case files match what has been entered in IBES.

The Information and Technology Services Division employs extensive requirements gathering and testing processes when modifying or adding to the Department's information systems. This process ensures system requirements are identified and documented. The testing process ensures modifications or additions accurately adhere to the requirements and do not adversely affect other aspects of the system. This process helps avoid programming errors.

Idaho relies on information that ACF reports regarding discrepancies and error flags. Reviewing this report provides information that assists in refining previously defined requirements so discrepancies do not happen again.

Sampling and Estimation Techniques

Idaho uses TAFI aggregate data for the TANF Data report.

When CERM conducts case reviews during its monitoring activities, they pull random samples. The sample is calculated by taking a statistically valid random sample of the total case load for the quarter. The sample meets a 90% level of confidence with a confidence interval of plus or minus 10%. The Quality Assurance Team follows the same random sampling techniques for a 90% confidence level.

V. VERIFYING OTHER DATA USED IN CALCULATING WORK PARTICIPATION RATES

Idaho validates data submitted in TANF Data Reports to meet a "complete and highly accurate" standard for data reporting. The data collection process related to TANF Data Reporting and Work Participation Rate is fully automated. This includes all elements identified on page 10 of the Work Verification Plan Guide # V (except Stratum). Idaho does not use Stratum.

Documentation:

Idaho's data validation procedures to ensure complete and highly accurate data reporting include:

Automated systems, including the TANF Data Report and IBES are subjected to requirement gathering standardized testing and verification processes carried out by Information and Technology Services Division.

Idaho's Work Verification Plan includes a process to compare ACF discrepancy reports on TANF data submissions to identify inconsistencies and errors. This provides us with a process to correct our data, ensuring it continues to be complete and highly accurate.

All of the elements listed (WVP, V.) are collected continuously, except Stratum. Stratum is not applicable because we report on the entire universe.

Idaho has developed a process to identify case inconsistencies in data elements. If errors are worker-caused, corrective actions are taken to provide training or clarify processes. If errors are system-caused, steps are taken to correct automated systems so errors do not occur in subsequent quarterly reports.

Work Participation Status

Idaho requires all adults who receive TAFI to participate in activities. The only disregards that might be applied would be for single custodial parents with a child younger than one. Individuals in this situation are still required to participate in life skill activities for the first twelve weeks of the child's life, and then must comply with work participation requirements. We encourage them to consider going to work earlier due to the 24 month lifetime benefit for TAFI.

Because Idaho requires all household adults to participate in TAFI, there are no disregards applied for work-eligible individuals who refuse to participate in work. Their eligibility is terminated. Case Management staff review and enter data regarding a work-eligible individual's participation status on a weekly basis. On a quarterly basis, CERM reviews TAFI cases to ensure appropriate families are included in work participation rates, and that appropriate documentation is on file that verifies work participation has been correctly keyed in IBES and in the appropriate work activity.

Through quarterly contract monitoring, Idaho ensures that families deemed to be engaged in work based on 20 hours of participation in countable work activities meet the requirements of a single custodial parent with a child under age six. CERM reviews TAFI cases to ensure appropriate families are included in work participation, and appropriate documentation is on file verifying work participation has been correctly keyed in IBES and in the appropriate work activity. CERM reviews a statistically valid random sample of cases, as described above.