



Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Transitional Assistance
600 Washington Street • Boston, MA 02111

DEVAL PATRICK
Governor

TIMOTHY P. MURRAY
Lieutenant Governor

JUDYANN BIGBY, M.D.
Secretary

JOHN A. WAGNER
Commissioner

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

Effective Date: October 1, 2007

Massachusetts' Work Verification Plan

TABLE OF CONTENTS

Overview.....	Page 2
I. Countable Work Activities.....	Page 3
A. Unsubsidized Employment.....	Page 3
B. Subsidized Public/Private Sector Employment.....	Page 5
C. Work Experience.....	Page 7
D. On-the-Job Training.....	Page 9
E. Job Search/Job Readiness Assistance.....	Page 11
F. Community Service.....	Page 15
G. Vocational Educational Training.....	Page 17
H. Job Skills Training Directly Related to Employment.....	Page 19
I. Education Directly Related to Employment.....	Page 20
J. Satisfactory Attendance at High School/Course of Study.....	Page 22
K. Providing Child Care to Individual Participating in Community Service.....	Page 23
II. Hours Engaged in Work.....	Page 24
A. Excused Absence Policy.....	Page 24
B. Fair Labor Standards Act Deeming.....	Page 25
III. Work-Eligible Individual.....	Page 26
A. Definition.....	Page 26
B. Procedures for Identifying Work Requirements.....	Page 26
C. Verification Procedures.....	Page 27
IV. Internal Controls.....	Page 28
A. Internal Controls designed to ensure work verification procedures are properly employed.....	Page 28
B. Internal Controls to contain data errors.....	Page 29
C. Isolation of the electronic systems.....	Page 29
D. Sampling and estimation techniques.....	Page 29
V. Verification of Other Data Used in Calculating the Work Participation Rates.....	Page 31
A. Additional Data Used.....	Page 31
B. Data Reporting Documentation.....	Page 32
C. Work Participation Status Procedures.....	Page 33

Massachusetts' Work Verification Plan

Overview

Massachusetts continues in its commitment to the principle that adults receiving assistance are expected to engage in education, training and work activities, with appropriate support services, and develop the capabilities to support themselves before their time-limited benefits expire.

The Massachusetts Work Verification Plan describes how the Commonwealth meets the requirements of the reauthorization of the Temporary Assistance for Needy Families (TANF) program in the Deficit Reduction Act of 2005.

This plan covers how Massachusetts:

- ensures that all work program activities are consistent with the Federal work activity definitions;
- identifies work-eligible individuals;
- requires reporting for hours of participation for each countable work activity;
- counts and verifies reported hours of work;
- monitors participation and ensures Massachusetts reports actual hours of participation;
- calculates work participation rates; and
- develops internal controls and procedures that are sufficient to verify and validate the work participation rate.

In compliance with the Federal Register, Vol. 71, No. 125, Subpart F (dated June 29, 2006), the State Work Verification Plan for Massachusetts is being submitted to the U.S. Department of Health and Human Services for approval. The plan is organized into five sections and represents the TANF Program in effect as of October 1, 2006. This plan has been revised based on additional guidance received in December of 2006.

Massachusetts' Work Verification Plan

I. Countable Work Activities.

From the beginning of 2006, Massachusetts worked to align the current Employment Services Program activities with the 12 main activities outlined by the Deficit Reduction Act of 2005 and where needed, modified its activities to conform to Federal Guidelines for FY 2007. To that end, Massachusetts modified its regulations and MIS Database to meet the September 30 deadline. These modifications included: 1. redefining by regulation the Job Search activity and 2. creating a counter to track weeks used during the federal fiscal year.

A. Unsubsidized Employment

1) Services and Programs:

This includes all paid employed and self-employed recipients in full- or part-time employment in the public or private sector that is unsubsidized by TANF or any other public program.

2) Determining the number of countable hours of participation:

Hours for employed recipients are determined by pay stubs or other employment records for employed recipients. This includes hours for which the recipient is paid, but has not worked, such as paid leave (vacation or sick leave) or paid holidays.

For self-employed recipients, Massachusetts calculates the hours of participation by taking the average of the three most current months' records of total gross income minus total gross business expenses and dividing that total by the minimum wage to determine the hourly figure.

3) The verification process for the actual hours of employment:

We collect employer records, pay stubs, pay envelopes, a statement from the employer on company letterhead or other employer-issued documentation from work-eligible individuals or employers. These are used as documentation and verification of hours worked weekly and retained in a recipient's case record.

Massachusetts uses a "Monthly Reporting" system. Recipients complete a monthly report form that is used to verify hours worked on a weekly basis. The hours reported are entered by the Department's case worker into Massachusetts' Automated Data Processing System. The system determines if the recipient is meeting the required number of hours of

Massachusetts' Work Verification Plan

participation. If not meeting the requirements without good cause, the system initiates a sanction process for the individual. The form remains in the case record.

For self-employment, describe how the State counts and verifies the hours of participation.

The number of hours of self-employment counted towards participation is determined by means of business records and tax returns that reflect the total amount of gross income minus the total gross business expenses associated with the gross income earned. The average of the three most current months' records is used. Gross business expenses are verified by records of bank deposits, records of wages paid to employees, and Social Security and other taxes paid on, and withheld from those wages; rent receipts, utility payments receipts, bills of lading, receipts for purchase of stock, and Workers' Compensation payment records. These are used as documentation and verification of hours worked weekly and retained in a recipient's case record. The hours reported are entered into Massachusetts' Automated Data Processing System by the Department's case worker. The system determines if the recipient is meeting the required number of hours of participation. If not meeting the requirements without good cause, the system initiates a sanction process for the recipient.

4) *The methods of daily supervision for each activity:*

N/A for paid employment.

5) *If a State intends to project forward hours of participation based on current, documented, actual hours, explain how it will make the projection:*

While Massachusetts currently does not use the calculation, we may in the future use the following formula to calculate "projecting forward hours of participation": We will average the number of hours reported divided by the number of weeks used (we will use a minimum of two consecutive weeks of wages that represent continuing hours of employment) in the representative sample to project forward the average weekly hours for the six month period. If circumstances were to change, we would no longer project forward those hours, but instead use the actual hours of participation.

Massachusetts' Work Verification Plan

B. Subsidized Public/Private Sector Employment

1) *Services and Programs:*

The definition of “subsidized public sector employment” is employment in the public sector for which the employer receives a subsidy from public benefit funds to offset some or all of the wages and costs of employing a recipient.

The definition of “subsidized private sector employment” is employment in the private sector for which the employer receives a subsidy from public benefit funds to offset some or all of the wages and costs of employing a recipient.

The subsidized employment programs in Massachusetts (both public and private) are: Supported Work (SW) Program, Vocational Rehabilitation Services (VRS) Program and the Full Employment Program (FEP). We competitively procure the VRS and SW program services which results in contracts with non-profit providers throughout Massachusetts.

The Supported Work Program provides the recipient with employment and support services needed to obtain and maintain employment. This component consists of worksite placement where a “host company” receives a wage subsidy for training the recipient and a third party contractor is the employer of record. Placement is for a minimum of 8 weeks and maximum of 39 weeks for a minimum of 30 hours per week. These activities may be a combination of training/education activities to support the recipient in the workplace and a Supported Work Worksite placement. (There is also a job readiness component to supported work, which is reported separately.) The Supported Work contractor pays a recipient participating in supported work. Employers are reimbursed \$3.40 per hour until the recipient is placed in a permanent job. The Supported Work provider agrees to hire the recipient within 30 days. If this does not happen, the provider must give the recipient up to 90 days of job search services until he or she finds a job. Department case managers work with recipients to ensure proper case management and delivery of support services.

The Vocational Rehabilitation Services Program provides the recipient with comprehensive individualized support and employment services needed to obtain and maintain employment. This component consists of

Massachusetts' Work Verification Plan

Job Placement and follow-up supports in line with the Supported Work model for individuals with disabilities as defined under the Rehabilitation Act of 1973 (29 USC 70S (35)). The Department monitors and reviews every invoice that participating employers submit for payment to determine if sufficient documentation exists to substantiate reported time and attendance data and to warrant a payment. These payments include subsidies for job coaches who act as onsite supervisors to train the recipient. This process ensures that the Department pays for and reports on actual and allowable hours of participation. Department case managers work with recipients to ensure proper case management and delivery of support services.

The Full Employment Program provides recipients with paid work experience and on-the-job training needed to obtain an unsubsidized job. Recipients receive from the employer a subsidized wage in lieu of TANF cash benefits and food stamps. The Department also monitors and reviews every invoice that participating employers submit for payment to determine if sufficient documentation exists to substantiate reported time and attendance data and to warrant a payment. This process ensures that the Department pays for and reports on actual and allowable hours of participation.

2) *Determining the number of countable hours of participation:*

Massachusetts continues its present practice to report on actual hours participated in a work-related activity or actual hours worked as opposed to scheduled hours participating in a work-related activity or scheduled hours working. Actual hours of participation are monitored daily by the provider and sent to the Department monthly.

3) *The verification process for the actual hours of participation:*

Each month, a recipient is required to sign and return a Participation and Attendance Form signed by the provider, which reports on the actual hours participated for each Supported Work or Vocational Rehabilitation Service activity for the previous month. For the Full Employment Program, the provider gives a statement of the actual hours worked/participated. The hours reported on these forms must be entered by the Department's case worker into Massachusetts' Automated Data Processing System, which determines if the recipient is meeting the required hours of participation. If the recipient is not meeting the requirements without good cause, the system initiates a sanction process for the individual. The form remains in the case record. The Department

Massachusetts' Work Verification Plan

monitors and reviews every invoice that Supported Work and Full Employment Program providers submit for payment to determine if sufficient documentation exists to substantiate reported time and attendance data and to warrant a payment. This process ensures that the Department pays for and reports on actual and allowable hours of participation.

4) *The methods of daily supervision for each activity:*

N/A for paid employment (Supported Work and Full Employment Program). All Vocational Rehabilitation Services Program activities are supervised daily by contracted providers in compliance with 45 CFR 261.62(b)(1)(iii). All contractual arrangements specify that providers must comply with this supervisory requirement. Recipients are assigned a work experience supervisor who provides daily supervision. The provider will notify DTA immediately if the recipient does not perform satisfactorily, fails to arrive at the work site timely or if there are barriers to employment. Department case managers work with recipients to ensure proper case management and delivery of support services.

5) *If a State intends to project forward hours of participation based on current, documented, actual hours, explain how it will make the projection:*

While Massachusetts currently does not use the calculation, we may in the future use the following formula to calculate “projecting forward hours of participation”: We will average the number of hours reported divided by the number of weeks used (a minimum of two consecutive weeks) in the representative sample to project forward the average weekly hours for the six month period. If circumstances were to change, we would no longer project forward those hours, but instead use the actual hours of participation.

C. Work Experience

1) *Services and Programs:*

Massachusetts expects to offer a work experience program that provides a recipient with an opportunity to acquire general skills, training, knowledge and work habits necessary to obtain employment.

Massachusetts expects this activity to be supervised by an employer, work site sponsor or other responsible person on an ongoing daily basis. Placements will be designed to prepare recipients to secure unsubsidized

Massachusetts' Work Verification Plan

employment by helping them develop a current work history, establish job references and develop and improve marketable employment skills. Prior to placement, work experience providers will be evaluated to ensure they match a recipient's employment goals with the needs of the work site placement. Work experience providers will be required to sign an agreement with DTA, which obligates employers to maintain records and prepare reports regarding the progress of the recipient. This will also include written verification of attendance, start and end dates of the activity, the weekly scheduled hours and actual hours of the activity and the skills the recipient will need and develop at the worksite.

2) *Describe how the State determines the number of countable hours of participation for the activity:*

Massachusetts will continue its present practice to report on actual hours participated in a work-related activity or actual hours worked as opposed to scheduled hours participating in a work-related activity or scheduled hours working. Actual hours of participation will be monitored daily by the provider and sent to the Department monthly. A recipient enrolled in the work experience program will be considered an employee under the Fair Labor and Standards Act (FLSA). The recipient will not be required to participate in the activity for more hours than the monthly cash assistance plus food stamp benefit amount divided by the state minimum wage. Recipients who participate under FLSA are considered to have met the weekly number of core activity hours. We will utilize the option of deeming up to 20 hours per week. Massachusetts has been approved to run a mini-Simplified Food Stamp Program, which permits it to combine the value of the cash grant and food stamp benefits in calculating the maximum hours.

3) *The verification process for the actual hours of participation:*

The FLSA is considered in determining the number of hours of participation. Each month a recipient will be required to return a Participation and Attendance Form signed by both the recipient and the provider, which verifies the actual hours of participation performed. The Department case worker will monitor the written verification for participation rate purposes. The form will remain in the case record. The hours reported on this form will be entered by the Department's case worker into Massachusetts' Automated Data Processing System which determines if the recipient is meeting the levels of participation. If not meeting the requirements without good cause, the system initiates a sanction process for the recipient.

Massachusetts' Work Verification Plan

4) *The methods of daily supervision for each activity:*

All activities will be supervised daily by contracted providers in compliance with 45 CFR 261.62(b)(1)(iii). All contractual arrangements will specify that providers must comply with this supervisory requirement. Recipients are assigned a work experience supervisor who will provide daily supervision. The provider will notify DTA immediately if the recipient does not perform satisfactorily, fails to arrive at the work site timely or if there are barriers to employment. Department case managers work with recipients to ensure proper case management and delivery of support services.

D. On-the-job Training

1) *Services and Programs:*

Massachusetts expects to provide “on-the-job” (OJT) training in the public or private sector to a paid employee engaged in productive work. The OJT model will provide knowledge and skills essential to maintain goals and expected performance on the job. In some instances Massachusetts will offer a subsidy to the employers to offset costs. The subsidy to an employer will be limited to no more than 50 % of the wages paid to the recipient.

Department case managers will be expected to assess and determine if the recipient lacks adequate work experience and/or occupational training and whether additional training is needed to meet an employer’s minimum hiring requirements or has limitations due to special needs. Massachusetts expects the activity to include: internships, practicums, professional certifications and clinical training required by an academic or training institution for licensure, when the recipient is paid by an employer to attend them and they meet the definition of OJT.

2) *Determining the number of countable hours of participation:*

Massachusetts will continue its present practice to report on actual hours participated in a work-related activity or actual hours worked as opposed to scheduled hours participating in a work-related activity when we institute OJT. This will include hours for which the recipient is paid but does not work, including paid leave and paid holidays. Actual hours of

Massachusetts' Work Verification Plan

participation will be monitored daily by the provider and sent to the Department monthly.

3) *The verification process for the actual hours of participation:*

When we institute OJT, the Department will obtain employer records, pay stubs, pay envelopes, a statement from the employer on company letterhead or other employer-issued documentation from work-eligible individuals or employers. These will be used as documentation and verification of hours worked and retained in the case record. The hours reported will then be entered by the Department's case worker into Massachusetts' Automated Data Processing System. The system will determine if the recipient is meeting the required number of hours of participation. If not meeting the requirements without good cause, the system initiates a sanction process for the recipient.

The Department intends to monitor and review every invoice that OJT providers submit for payment to determine if sufficient documentation exists to substantiate reported time and attendance data and to warrant a payment. This process ensures that the Department will pay for and report on actual and allowable hours of participation.

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

When we institute it, OJT training will be occupation-specific and differs from subsidized employment in that on-the-job training includes a training plan. The training plan will be designed as a formal written plan that incorporates: instructions in work skills, general work competencies and occupationally specific skills that will help the recipient reach self-sufficiency.

The methods of daily supervision for each activity:

When we institute OJT all activities will be supervised daily by contracted providers in compliance with 45 CFR 261.62(b)(1)(iii). All contractual arrangements will specify that providers must comply with this supervisory requirement. The provider will notify the Department immediately if the recipient does not perform satisfactorily and/or fails to arrive at the work site timely. Department case managers will work with recipients to ensure proper case management and delivery of support services.

Massachusetts' Work Verification Plan

5) *If a State intends to project forward hours of participation based on current, documented, actual hours, explain how it will make the projection:*

Massachusetts currently does not use the calculation, but we may in the future use the following formula to calculate “projecting forward hours of participation”: We will average the number of hours reported divided by the number of weeks (a minimum of two consecutive weeks) used in the representative sample to project forward the average weekly hours for the six month period. If circumstances were to change, we would no longer project forward those hours.

E. Job Search/Job Readiness Assistance

1) *Services and Programs:*

Massachusetts offers a Job Search/Job Readiness (JS/JR) program through its partnership with Career Centers and as a component of Supported Work and Vocational Rehabilitation Services. While the Job Search/Job Readiness program is based on the Federal definition of the Job Search/Job Readiness program (limited to six weeks within a Federal Fiscal Year of which only four may be consecutive), no recipient is excluded from participation if extra time is needed to complete the program. Massachusetts only reports on hours participated within six weeks in a Federal Fiscal Year four of which are consecutive. Note: Massachusetts will expand this to 12 weeks if deemed a “Needy State.” Based on our current food stamp participation numbers, Massachusetts is expected to qualify as a “Needy State” for all months of the current federal fiscal year (with the exception of October and November).

Job Search/Job Readiness Assistance consists of activities designed to help an individual find employment or improve a recipient’s employment prospects. The recipient may receive the following services from the above-referenced programs:

- Orientation sessions to acquaint the recipient with the services offered by the provider.
- Skill assessments to determine services needed to reach self-sufficiency.
- Structured Job Search including seeking job openings, applying and interviewing for employment.

Massachusetts' Work Verification Plan

- Workshops to build skills in job search competencies (interviewing skills and resume writing).
- Life skills training that help recipients succeed in the workforce (such as, budgeting, interpersonal skills, decision making skills and time management).
- Employment upgrade services once the recipient is employed.

In the future, Massachusetts expects to expand Job Search/Job Readiness Assistance to include substance abuse treatment, mental health treatment or rehabilitation activities for those who are otherwise employable. Such treatment or therapy would be determined necessary and certified by a qualified medical and/or mental health professional. These determinations would be made by an alcohol and/or substance abuse professional licensed by Massachusetts. A qualified medical or mental health professional is an individual who is licensed, certified and currently registered to practice in Massachusetts and who is not currently suspended from providing health care or diagnostic services by any government regulating agency. Physicians are board certified/board eligible.

Once expanded, these services will include the following substance abuse and mental health services:

- Detoxification services with medical care and physician supervision. A State licensed health care provider will supervise and provide written description of the treatment/therapy as well as a statement that the treatment is necessary for the recipient to go to work.
- Mental health services (treatment, therapy, counseling). A State licensed health care provider will supervise and provide written description of the treatment/therapy as well as a statement that the treatment is necessary for the recipient to go to work.

2) *Determining the number of countable hours of participation:*

Massachusetts continues its present practice to report on actual hours participated in a work-related activity as opposed to scheduled hours participating in a work-related activity.

For the job search portion of this activity, the provider maintains a daily log of all potential employers contacted through appointments, interviews or via the Internet or telephone. This log is then audited during site visits to ensure the validity and accuracy of the reported contacts by conducting

Massachusetts' Work Verification Plan

random reviews. When these logs are incomplete or the information is contradictory in nature, we require that they be completed so that we can report on these hours for the work participation rate. Massachusetts will only report on the week as meeting federal participation targets when the recipient meets the required federal hours of participation.

For the job readiness portion of this activity, the provider maintains records on a daily basis, which are submitted to the Department monthly. Once instituted, countable hours for individuals participating in substance abuse or mental health treatment activities will be based on a treatment plan signed by a qualified medical or mental health professional. Authorized treatment providers will provide a daily time sheet or other document specifying actual hours of attendance, which will be submitted to the Department monthly.

3) *The verification process for the actual hours of participation:*

Actual hours of job search and job readiness assistance is verified and documented by the provider on a daily basis. Each month a recipient is required to return a Participation and Attendance Form signed by the recipient and the provider, which reports on the actual hours, participated for each activity for the previous month's participation. The hours reported on this form must be entered by the Department's case worker into Massachusetts' Automated Data Processing System, which determines if the recipient is meeting the required number of hours of participation. If not meeting the requirements without good cause, the system initiates a sanction process for the recipient. The form remains in the case record.

When the Department begins to offer these services, countable hours for recipients participating in Detoxification Services or Mental Health Services will be based on the treatment plan signed by a qualified (licensed) medical or mental health worker.

4) *The methods of daily supervision for each activity:*

All activities are supervised daily by contracted providers in compliance with 45 CFR 261.62(b)(1)(iii). All contractual arrangements specify that providers must comply with this supervisory requirement. Individuals develop a service plan that outlines their goals and necessary activities they must engage in on a daily basis to meet participation requirements. This plan is monitored daily by provider staff. For job readiness activities, the provider maintains a log of daily attendance and provides

Massachusetts' Work Verification Plan

daily supervision. Department case managers work with recipients to ensure proper case management and delivery of support services.

Once instituted, daily supervision for recipients participating in Detoxification Services or Mental Health Services will be performed by the service (treatment) provider. Department case managers will maintain contact with these service providers, as needed.

- 5) *If the State intends to count substance abuse treatment, mental health treatment and/or rehabilitation activities, describe the criteria to determine whether recipients are "otherwise employable" and establish the necessity of treatment or therapy. Describe the certification requirements for qualified medical or mental health professionals used in this process.*

Massachusetts expects to expand Job Search/Job Readiness Assistance to include substance abuse treatment, mental health treatment or rehabilitation activities. The plan will include a statement from a qualified medical or mental health professional who will include whether the participant is otherwise employable. At the same time, the Department plans to have the case worker complete an employability assessment in conjunction with the professional statement, using his or her experience and observation of the recipient, past participation of the recipient and the recipient's employment activities.

The plan would be to use a qualified medical or mental health professional who is licensed, certified and currently registered to practice in Massachusetts and who is not currently suspended from providing health care or diagnostic services by any government regulating agency. Physicians will be board certified/board eligible required to complete and sign a report form indicating the type, duration and frequency of the treatment.

- 6) *Describe how the state insures that no more than six weeks total (four consecutive weeks) of job search/job readiness 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):*

Time limitations on this activity are programmed into the Massachusetts' Automated Data Processing System. Weeks extending beyond the specified time-limit are not counted towards participation. The Massachusetts' Automated Data Processing System resets the weeks counter to "0" at the beginning of each federal fiscal year. The system is

Massachusetts' Work Verification Plan

programmed to disregard any participation that occurs during the 5th consecutive week and during the 7th or greater within the same federal fiscal year (or in the 13th or greater week when Massachusetts qualifies as a “needy state”).

F. Community Service

1) *Services and Programs:*

Massachusetts provides a structured program (the community service site signs an agreement with Massachusetts that the placement will fulfill a community benefit) and embedded activities under which recipients perform work for the direct benefit of the community through a public or nonprofit organization sited in fields such as: health, social services, environmental protection, education, redevelopment, welfare, recreation, public facilities, public safety and child care. Massachusetts excludes work on political campaigns and/or political offices as counting towards community service. Recipients enrolled in the community service program are not otherwise able to find work. The program is designed to increase their “employability” through participation in the community service program. All community service site activities are designed to provide a direct benefit to the community.

2) *Determining the number of countable hours of participation:*

Community Service providers and recipients report on actual hours of participation. Actual hours of participation are monitored daily by the provider and sent to the Department monthly.

3) *The verification process for the actual hours of participation:*

Actual hours of participation are monitored daily by the provider. Each month a recipient is required to return a Participation and Attendance Form signed by the recipient and the provider, which reports on the actual hours participated. The hours reported on this form must be entered by the Department’s case worker into Massachusetts’ Automated Data Processing System, which determines if the recipient is meeting the required number of hours of participation. If not meeting the requirements without good cause, the system initiates a sanction process for the recipient. The form remains in the case record.

Massachusetts' Work Verification Plan

4) *The methods of daily supervision for each activity:*

Organizations providing community service placements are required by Massachusetts to provide a structured work setting with daily supervision. Self-initiated community service placements are governed by the same standards. Recipients are assigned a community service site (unless self-initiated). The requirement for daily supervision is part of the formal agreement between Massachusetts and the provider. Also as part of the agreement, the provider will notify the Department if the recipient does not meet participation standards or if the recipient has barriers to employment. Department case managers will work closely with recipients to ensure that the placement is beneficial to the community and that the recipient receives proper case management and delivery of support services.

5) *Describe how the types of community service positions that create an employer/employee relationship are subject to the FLSA minimum wage will be determined:*

A recipient enrolled in the community service program is considered an employee under the Fair Labor and Standards Act (FLSA) and is compensated through a cash benefit and food stamp benefit at the applicable minimum wage. Recipients cannot be required to participate in activities for more hours than the monthly cash assistance plus food stamp benefit amount divided by the state minimum wage. Recipients who participate under FLSA are considered to have met the weekly number of core activity hours. We will utilize the option of deeming up to 20 hours per week. Massachusetts has been approved to run a mini-Simplified Food Stamp Program, which permits it to combine the value of the cash grant and food stamp benefits in determining the maximum hours.

If the State permits self-initiated community service placements, describe how it determines that the placement provides a direct community benefit and improves the recipient's employability.

Massachusetts allows for self-initiated community service site participation by the recipient with established public or non-profit organizations that provide a direct community service. Before these sites are approved, the community service site signs an agreement setting forth that the placement will fulfill a community benefit. Additionally, the recipient must show that this placement improves a recipient's employability by providing a chance to perform work, learn new work skills and increase self-esteem by contributing to the community.

Massachusetts' Work Verification Plan

G. Vocational Educational Training

1) *Services and Programs:*

Massachusetts offers organized educational programs directly related to the preparation of recipients for employment in current or emerging occupations requiring training other than a baccalaureate or advanced degree. Activities include: basic and remedial education and English as a Second Language (ESL), which is only provided as an integrated (embedded) activity. Training must be provided by academic, educational and training institutions such as vocational-technical schools, community colleges, postsecondary institutions and non-profit organizations. Distance learning sites are included in this component and are considered acceptable to Massachusetts, assuming the provider monitors and documents computer log-in time by recipients.

Vocational education services provided through partnerships with the Workforce Investment System and community colleges may also include vocational-technical schools, degree or certificate programs at secondary schools as well as post-secondary education. Certificate programs are offered in the following areas: Certified Nurses Aid, Early Childhood Training, Customer Services Training in the medical, retail or financial services fields, Construction Employee Preparation Program, Home Health Aide, Dental Assistant, Banking Professionals (Tellers) and Trades (construction, carpentry, electrical work).

Other organized educational programs directly related to the preparation of individuals for employment in current or emerging job fields requiring training in certificate programs (which do not include advanced degrees) are also included.

2) *Determining the number of countable hours of participation:*

Massachusetts continues its practice to report on actual hours participated in a work-related activity as opposed to scheduled hours participating in a work-related activity.

Actual hours of participation (including time spent performing clinical requirements, lab work or other related activities) are monitored daily by the provider and sent to the Department monthly.

Massachusetts' Work Verification Plan

Massachusetts does not include supervised study time in reporting participation but may do so in the future. We do not count unsupervised study time.

- 3) *The verification process for the actual hours of participation:*
Each month a recipient is required to return a Participation and Attendance Form signed by the recipient and the provider, which reports on the actual hours, participated. The hours reported on this form must be entered by the Department's case worker into Massachusetts' Automated Data Processing System, which determines if the recipient is meeting the required number of hours of participation. If not meeting the participation requirements without good cause, the system initiates a sanction process for the recipient. The form remains in the case record.
- 4) *The methods of daily supervision for each activity:*
All activities are supervised daily by providers in compliance with 45 CFR 261.62(b)(1)(iii). All contractual arrangements specify that providers must comply with this supervisory requirement. Individuals develop a service plan that outlines their goals and necessary activities they must engage in on a daily basis to meet participation requirements. This plan is monitored daily by provider staff. Distance learning sites monitor computer log-in time by recipients. Department case managers work with recipients to ensure proper case management and delivery of support services.
- 5) *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:*
The 12-month limit on Vocational Educational Training is strictly monitored using a counter in the Massachusetts' Automated Data Processing System. Time limitations on this activity are programmed into the Massachusetts' Automated Data Processing System. Months extending beyond the specified 12 month time-limit are not counted towards participation. Each month the Department's case worker enters a Participation and Attendance Form. The counter accretes one month when the education or training activity is used to meet the work program requirement. The case manager receives a warning message when nine months of the 12-month limit has been reached. The recipient receives a notice at the same time informing him or her of the impending time limit. When the counter reaches 12 months, the activity no longer counts

Massachusetts' Work Verification Plan

towards either the federal participation rate or Massachusetts' work program requirement.

- 6) *Describe how the State will ensure that basic and remedial education and English as a Second Language (ESL), if such activities are counted, are of limited duration and a necessary or regular part of the vocational educational training:*

Basic and remedial education and ESL can only be included in the calculation when the vocational education provider submits a statement substantiating that the participant is engaged in an approved vocational or training activity but requires the basic or remedial education or ESL instruction to continue participating in the program. These activities are essential to the vocational education training component to eliminate any barriers to employment. Daily supervision is required.

H. Job Skills Training Directly Related to Employment

- 1) *Services and Programs:*

Massachusetts offers training or education for job skills required by the employer or general training that provide a recipient with the ability to obtain employment or to advance or adapt to the changing demands of the workplace. Massachusetts Programs include both customized and general training to prepare a recipient for employment, including education and training for job skills, literacy and language instruction.

- 2) *Determining the number of countable hours of participation:*

Job Skills Training providers report on actual hours of participation. Actual hours of participation (including time spent performing clinical requirements, lab work or other related activities) are monitored and documented daily by the provider, are considered to be countable participation hours and are sent to the Department monthly.

Massachusetts does not include supervised study time in reporting participation but may do so in the future. We do not count unsupervised study time.

Massachusetts' Work Verification Plan

3) *The verification process for the actual hours of participation:*

Contractors and training providers are responsible for daily supervision of assigned recipients and must submit documentation of total hours in their program to the Department. Each month a recipient is required to return a Participation and Attendance Form signed by the recipient and the provider, which reports on the actual hours, participated. The hours reported on this form must be entered by the Department's case worker into Massachusetts' Automated Data Processing System, which determines if the recipient is meeting the required number of hours of participation. If not meeting the requirements without good cause, the system initiates a sanction process for the recipient. The form remains in the case record.

4) *The methods of daily supervision for each activity:*

The Job Skills Training provider provides daily supervision for these recipients and must notify Massachusetts of recipient compliance, progress and attendance via telephone, meetings or written communication. Department case managers work with recipients to ensure proper case management and delivery of support services.

I. Education Directly Related to Employment (recipient has not received high school diploma or GED)

1) *Services and Programs:*

Adult recipients who have not received a high school diploma or GED and need further education to get a specific job or job offer are enrolled in courses designed to provide knowledge and skills for specific occupations or work settings. These courses may also include Adult Basic Education Services/GED, literacy classes and English as a Second Language (ESL).

2) *Determining the number of countable hours of participation:*

Education providers report on actual hours of participation. Actual hours of participation (including time spent in supervised study halls) are monitored daily by the provider and sent to the Department monthly. We do not count unsupervised study time.

Massachusetts' Work Verification Plan

3) *The verification process for the actual hours of participation:*

The method of verification of actual hours will be dependent upon the activity and the student composition of the class. For instructional activities comprised entirely of TANF students, class attendance sheets will be used to verify attendance. For activities which include non-TANF students, individual timesheets will be signed by the faculty member, supervisor, or other appropriate individual as well as the student or documented in electronic tracking systems, as appropriate. For ESP-funded college programs, attendance records will be documented every two weeks and maintained in the college's or provider's students' files, as well as with the TANF case. Each month a recipient is required to return a Participation and Attendance Form signed by the recipient and the provider, which reports on the actual hours, participated. The hours reported on this form must be entered by the Department's case worker into Massachusetts' Automated Data Processing System which determines if the recipient is meeting the required number of hours of participation. If not meeting the requirements without good cause, the system initiates a sanction process for the recipient. The form remains in the case record.

4) *The methods of daily supervision for each activity:*

Daily supervision of recipients in the education component are performed by faculty members, course instructors or supervisors of work-based education activities all of whom must notify Massachusetts of recipient compliance, progress and attendance via telephone, meetings or written communication. Department case managers work with recipients to ensure proper case management and delivery of support services.

5) *Describe the State's criteria for "good and satisfactory progress" and when and how it is documented:*

Massachusetts expects these recipients to be making "good and satisfactory progress" in achieving a high school diploma or GED. Massachusetts defines criteria for "good and satisfactory progress" as course advancement measured through progress reports, grade level testing and passing grades according to the standards created by the educational institution. "Good and satisfactory progress" is documented at the end of every grading period as established by the educational institution.

Massachusetts' Work Verification Plan

J. Satisfactory Attendance at high school or in a course of study to obtain GED where recipient has not completed high school or GED

1) *Services and Programs:*

Massachusetts allows regular attendance at secondary schools or a course of study at secondary schools or a course of study leading to a certificate of general equivalence. If in school, for whatever constitutes satisfactory school attendance (full-time) for Massachusetts, the minor parent is deemed meeting the Federal Participation Rate.

DTA procures Young Parent Program (YPP) services with non-profit agencies throughout Massachusetts. The YPP is a part of Massachusetts's Employment Services Program (ESP). The expectation is for these recipients to succeed in the world of work and work role identification are elements necessary to motivate Young Parents to seek and maintain work. The program is directed toward reducing welfare dependency among minor parents, ages 14 through 21, who have not received a high school diploma or its equivalent. The goal of the program is to receive a GED. YPP programs provide basic education, English as a Second Language (ESL), Life and Parenting Skills, Prevocational Activities, Job Development, Placement and Follow-up, Personal, Academic and Vocational Counseling, Case Management, Advocacy and Referral Services and Support Services.

DTA partners with the Massachusetts Department of Social Services (DSS) who administers the Teen Living Program (TLP). The TLP is a structured living setting/shelter in which minor parent recipients must enroll and make good and satisfactory progress in a school not beyond high school, in a GED program or in a YPP.

Massachusetts allows minor parent recipients to complete high school/GED/or participate in a TLP.

2) *Determining the number of countable hours of participation:*

Massachusetts continues its present practice to report on actual hours participated in an education activity as opposed to scheduled hours participating in an education activity. Actual hours of participation (including time spent in supervised study halls) are monitored daily by the education provider and sent to the Department monthly.

Massachusetts' Work Verification Plan

- 3) *The verification process for the actual hours of participation:*
Each month a recipient is required to return a Participation and Attendance Form signed by the recipient and the provider, which reports on the actual hours, participated. The hours reported on this form must be entered by the Department's case worker into Massachusetts' Automated Data Processing System, which determines if the recipient is meeting the required hours of participation. If not meeting the requirements without good cause, the system initiates a sanction process for the recipient. The form remains in the case record.
- 4) *The methods of daily supervision for each activity:*
Daily supervision of recipients in the education component are performed by faculty members, course instructors or supervisors of work-based education activities all of whom must notify Massachusetts of recipient compliance, progress and attendance via telephone, meetings or written communication. Department case managers work with recipients to ensure proper case management and delivery of support services.
- 5) *Describe the State's criteria for "good and satisfactory progress" and when and how it is documented:*
Massachusetts expects these recipients to be making "good and satisfactory progress" in achieving a high school diploma or GED. Massachusetts defines criteria for "good and satisfactory progress" as course advancement measured through progress reports, grade level testing and passing grades according to the standards created by the educational institution. "Good and satisfactory progress" is documented at the end of every grading period as established by the educational institution.

K. Providing Child Care Services to an individual participating in community service

- 1) *Services and Programs:*
Massachusetts counts as an allowable work activity the provision of child care by a recipient to another recipient participating in community service (providing this child care allows another recipient to participate in a community service program). This is a structured program and is used on a very limited basis for those recipients who cannot find placement in other employment or work-related activities.

Massachusetts' Work Verification Plan

- 2) *Determining the number of countable hours of participation:*
Massachusetts continues its practice to report on actual hours participated in this activity as opposed to scheduled hours participating in a work-related activity. Actual hours of participation are monitored daily and sent to the Department monthly.
- 3) *The verification process for the actual hours of participation:*
Each month a recipient is required to return a Participation and Attendance Form signed by the recipient and the provider, which reports on the actual hours, participated. The hours reported on this form must be entered by the Department's case worker into Massachusetts' Automated Data Processing System, which determines if the recipient is meeting the required hours of participation. If not meeting the requirements without good cause, the system initiates a sanction process for the recipient. The form remains in the case record.
- 4) *The methods of daily supervision for each activity:*
Those providing child care to a community service participant must offer a structured setting with daily supervision. Department case managers work with providers to ensure proper delivery of support services.

II. Hours Engaged in Work.

A. Excused Absence Policy:

1) **Good Cause Policy:** Massachusetts allows 10 days of excused absences per year (of which, not more than two are in a single month) to count towards a recipient meeting the Federal Participation Rate. Excused absences include: lack of appropriate and available child care, lack of affordable and reliable transportation, housing search, lack of available and appropriate community service sites identified by the Department, illness, disability, family crisis, emergency or other compelling circumstances, an activity that discriminates on the basis of age, sex, religion, ethnic origin or physical or mental handicap or that involves conditions that violate applicable health or safety standards or is unavailable due to strike or lockout. Massachusetts' Automated Data Processing System has been programmed to track these excused absences (of not more than two per month or 10 within a Federal Fiscal Year) to report Federal Participation Rates.

Massachusetts' Work Verification Plan

2) Holiday Policy: Massachusetts allows Federal, State, company and school holidays to be treated as countable towards a recipient meeting his or her work participation hours. The holidays countable towards participation include: New Year's Day, Martin Luther King Day, President's Day, Memorial Day, Fourth of July, Labor Day, Columbus Day, Veteran's Day, Thanksgiving and Christmas. This list of countable days towards participation also includes days when the work site is unavailable as a matter of program or company policy, or other excused holidays/personal days allowed by the work site or program.

B. Fair Labor Standards Act Deeming:

Massachusetts has adopted a "mini" Simplified Food Stamp Program (SFSP) in order to count the value of food stamp benefits when determining the number of hours a recipient can participate in community service and work experience. The amount of TANF benefits plus Food Stamp benefits divided by the minimum wage divided by 4.333 determines the weekly hours of participation.

Hours of participation for recipients enrolled in Community Service or Work Experience will be calculated as follows: If the hours calculated are less than 20 hours per week Massachusetts will deem participation up to 20 hours per week for federal participation purposes. If the hours calculated are 20 hours per week or greater but less than the recipient's work requirement, the recipient must enroll in another activity. The SFSP allows Massachusetts to deem hours up to 20 hours per week.

Massachusetts has automated the FLSA calculation to ensure that recipients do not exceed hours of participation in community service. Deeming is limited to core hours and cannot be counted towards participation in other components or as participation for other individuals (i.e., disabled adults or children).

Community Service providers and recipients continue to report on actual hours of participation. Actual hours of participation are monitored daily by the provider and sent to the Department monthly.

Each month a recipient is required to return a Participation and Attendance Form signed by the recipient and the provider, which reports on the actual hours, participated. The hours reported on this form must be entered into Massachusetts' Automated Data Processing System which determines if the

Massachusetts' Work Verification Plan

recipient is meeting the required number of hours of participation and if not meeting the requirements without good cause, initiates a sanction process for the individual. The form remains in the case record.

III. Work-Eligible Individual

A. Definition:

Currently a work eligible recipient is defined as:

- 1) An adult recipient receiving assistance under TANF or a separate state program that is counted towards maintenance of effort, or a minor parent who is a head-of-household or a spouse of head-of-household.
- 2) A sanctioned adult recipient living with a child receiving assistance.
- 3) On a case by case basis, an employed non-recipient or a non-recipient participating in the work program that meets federal participation requirements who is receiving SSI and living with a child receiving assistance.
- 4) Massachusetts' procedures for identifying a parent caring for a disabled family member requires the disability of the family member to be verified every six months on a form filled out by a competent medical authority. Massachusetts defines "family member" as a person related to the grantee. Massachusetts disregards any adult recipient caring for a disabled person who is below the age of 6 or over the age of 18 or disabled child not attending school full time. Once the disability ends, the excluded adult must meet the work requirement.

B. Procedures for identifying work requirements for all work eligible recipients:

Massachusetts has the following hierarchy built into its Automated Data Processing System that identifies all work eligible recipients for Federal Reporting purposes:

- 1) If a one parent family, where the adult grantee is not a teen, and his or her youngest child is less than 6 but greater than one, then the Federal Participation Requirement is an average of 20 hours per week of a Core Activity.
- 2) If a one parent family, where the adult grantee is not a teen, and his or her youngest child is 6 or older, then the Federal

Massachusetts' Work Verification Plan

Participation Requirement is 30 hours per week (20 Core plus 10 Core/Non-Core).

- 3) If a one parent family where the grantee is a teen parent (less than 20 years old), his or her youngest child is less than 6 but greater than one, then the Federal Participation Requirement is 20 hours per week (either core or non-core). If in school, for whatever constitutes satisfactory school attendance (full-time) for Massachusetts, the teen parent is deemed meeting the Federal Participation Rate.
- 4) If a one parent family where the grantee is a teen parent (less than 20 years old), his or her youngest child is 6 or older, then the Federal Participation Requirement is 30 hours per week (either core or non-core). If in school, whatever constitutes satisfactory school attendance (full-time) for Massachusetts, the teen parent is deemed meeting the Federal Participation Rate.
- 5) If a two parent family who does not receive subsidized child care, then the Federal Participation Requirement is 30 hours per week (20 Core plus 10 Core/Non-Core) for each work-eligible parent for the all family rate and a combined 35 hours per week (30 core plus 5 core/non-core) for the two parent rate.
- 6) If a two parent family who receives subsidized child care, then the Federal Participation Requirement is 30 hours per week (20 Core plus 10 Core/Non-Core) for each work-eligible parent for the all family rate and a combined 55 hours per week (50 core plus 5 core/non-core) for the two parent rate.

C. Verification procedures for ensuring the accuracy in reporting work eligible individuals:

In addition to the forms defined earlier in this plan to verify participation, Massachusetts is ensuring that Federal Work activities count for only the allotted time frames. To that end, Massachusetts' Automated Data Processing System has the following clocks to measure:

- 1) 12-month lifetime limit on education and training;
- 2) Four week consecutive/six week total Job Search/Job Readiness clock that will be reset every Federal Fiscal Year. Massachusetts will expand this to 12 weeks if deemed a "Needy State." Based on our current food stamp participation numbers, Massachusetts

Massachusetts' Work Verification Plan

is expected to qualify as a "Needy State" for all months of the current federal fiscal year (with the exception of October and November);

- 3) 60-Month Lifetime Limit of Federal Benefits clock; and
- 4) Child under One-year Old Clock.

These clocks have been designed to ensure compliance with these Federal rules.

Data is entered monthly by workers who receive reported actual participation hours on forms returned by the adult recipient. Failure of the adult recipient to return these forms results in a sanction, absent a good cause reason. These hours are then matched against internal rules in Massachusetts' Automated Data Processing System to determine if the adult recipient has met the work requirement or has indicated a good cause reason for failing to participate. If not, the adult recipient is subject to warnings and progressive sanctions. Additionally, these hours are stored in Massachusetts' Automated Data Processing System Data Warehouse where Program Assessment and Quality Control staff access the data for federal reporting.

IV. Internal Controls

Massachusetts has the following internal controls to ensure a consistent measurement of work participation rates. Massachusetts confirms that it will maintain all pertinent findings produced through an internal control process and these findings will be made available by Massachusetts for ACF and other auditors in reviewing its work participation verification system.

A. Internal Controls designed to ensure work verification procedures are properly employed.

Massachusetts' Quality Control Specialists will continue to review all sample cases to ensure that work verification procedures are properly followed. Specific procedures of interest include: Job Search limits, Vocational Education limits, actual hours reported, activity is countable work activity and supervision requirements for each activity.

Additionally, Employment Services Program (ESP) Specialists will conduct site visits throughout the year to all partner agencies providing employment services to DTA clients. The audit provided by ESP

Massachusetts' Work Verification Plan

Specialists will include a review of Department documentation, specifically policy and procedures regarding attendance, supervision and monitoring. During the site visit ESP Specialists will observe all facets of the services provided to DTA clients by ESP partner agencies.

Massachusetts continues to provide field staff with procedural documentation and training to ensure work verification procedures are properly employed.

B. Internal Controls to contain data errors.

Massachusetts will continue to use the following methods to contain data errors: staff training on new/revised functionality of Massachusetts' Automated Data Processing System, mandatory supervisory sign-off on most case actions and internal edits on Massachusetts' Automated Data Processing System ensuring that cases are coded properly for work program participation purposes.

C. Isolation of the electronic systems and programming errors.

Massachusetts Quality Control (QC) personnel will manually review a sample of all TANF cases to ensure that the information captured by the state's automated administrative data system matches the verification information included in the client's case record. The scope of this review will be determined with guidance from ACF.

D. Sampling and estimation techniques.

Overview

Massachusetts has refined its TANF data collection sampling procedures slightly to reflect the post-waiver composition of our federal TANF caseload. The major change associated with this shift is the creation of a solely state-funded assistance program to aid certain families.

Sample Frame

The State's Automated Data Processing System (BEACON) contains information on all active and recently closed cases, including TANF cases. The monthly Data Warehouse tables are snapshots of selected BEACON tables. These tables are created at the end of each month and saved as monthly archives. It is from this file that the TANF sample frames

Massachusetts' Work Verification Plan

(universes) are drawn. The sample frame is complete and accurate since it is derived from the program that generates TANF assistance.

Active Cases

The universe is defined as all TANF cases issued a TANF cash benefit during the calendar month. The universe is divided into three strata. These have been developed on the basis of federal requirements and the constraints of our computer system:

Stratum 1 includes both re-opened cases and new cases. New cases are defined as those cases that were issued their first TANF benefit during the review month and have not previously received TANF benefits. Re-opened cases are included only when the case has not received a TANF benefit in the previous calendar month. This information is ascertained using the BEACON Benefits table.

Stratum 2 includes two-parent families funded through TANF.

Stratum 3 is made up of all other active TANF cases.

Closed Cases

The creation of this sample stratum is based on benefit issuance. Cases receiving a TANF benefit in the previous month (but not in the current month) are considered closed with one exception: cases temporarily suspended due to a 5 week month are not considered closed. All cases meeting these criteria are compiled into the closed case sample.

Sample Selection Calculations

At the beginning of the year, Massachusetts determines the parameters to be used each month for sample selection by a stratified random sampling. Random starts are obtained from a random number generator. The sampling interval is determined by examining available universes for the previous fiscal year and forecasting an average universe for the next year. An allowance is made for cases not completed or listed in error and for any unexpected drop in sample size. Each year, ACF requires that we complete at least 600 reviews in both Stratum 1 and Stratum 2, and a total of 3000 reviews overall. Eight hundred completed reviews are required of closing actions. The above calculations are submitted to ACF's regional office for weighting purposes.

Massachusetts' Work Verification Plan

If it appears that the monthly samples drawn will not provide an appropriate yearly sample, the sampling interval will be changed. If the sample will be too small, a supplemental sample will be drawn for past months and a revised sampling interval will be calculated for future months, such that the samples will not need time-wise weighting.

Sample Selection

Sample selection procedures are the same for both active and closed cases. The Department generates a “universe list” containing internally unique case ID numbers and stratum identifiers. The universe is ordered by the unique case identifier. The random starts and intervals for our strata are applied to this list and sample cases and then ordered by region, office and SSN and assigned a sequential review number.

Case Review

Cases are assigned to reviewers on a geographical basis. Reviewers record their findings on review schedules of Massachusetts's design, which are then keyed centrally into an ACCESS database. Listed in-error cases are disposed of as such by the reviewer. A summary of the data is reported quarterly to ACF.

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

A. Additional Data Used:

Under the “complete and accurate” standard for data reporting, Massachusetts will validate all data submitted in its TANF Data Report and, if applicable, the SSP-MOE Data Report.

In addition to the work activities, the following data elements are currently used in calculating the work participation rates:

- Reporting Month
- Case Number
- Disposition
- Type of Family for Work Participation
- Amount of Food Stamps Assistance
- Receipt of Subsidized Child Care

Massachusetts' Work Verification Plan

- Amounts of TANF (and SSP-MOE) Assistance
- Family Affiliation Code
- Non-custodial Parent Indicator
- Date of Birth (Adult)
- Relationship to Head-of-Household
- Parent with Minor Child
- Work-Eligible Individual Indicator
- Date of Birth (Child)

The procedures below are used to establish that Massachusetts TANF families with a work-eligible recipient are broken out by the case characteristics that relate to the special rules and conditions of participation, such as receipt of child care, age of child, age of adult or teen parent, number of months under a sanction, adult or teen parent with satisfactory school attendance, and families with a disabled family member (adult or child).

B. Data Reporting Documentation:

- 1) Massachusetts' data validation procedures to ensure "complete and accurate" data reporting:

Lists of transmitted cases are compared to sample selection lists to verify that all cases have been reported. Transmission reports received back from ACF are checked and cases are converted and retransmitted as necessary. For each of the data elements above, Massachusetts creates and applies internally developed edits using Visual Basic programming and incorporating the "fatal" and "warning" edits as described in the TANF Data reporting guidelines. These edits have been developed and are used to monitor accuracy and consistency of the data reported. Any inconsistencies in edits between two or more data elements are then corrected prior to transmission to the Federal Government.

- 2) Procedures employed to eliminate data inconsistencies between two or more data elements.

Massachusetts creates and applies internally developed edits using Visual Basic programming. These edits have been developed and are used to monitor accuracy and consistency of the data reported. Any inconsistencies in edits between two or more data elements are then

Massachusetts' Work Verification Plan

corrected at a monthly unit meeting prior to transmission to the Federal Government.

C. Work Participation Status Procedures:

- 1) Procedures used to ensure a family deemed engaged in work based on 20 hours of participation in countable work activities meets the requirements of a single custodial parent or caretaker relative with a child under age six.

Massachusetts reports on a sample for TANF. Each sample case is reviewed for accuracy in information and documentation by a Quality Control Specialist. The information in Massachusetts' Automated Data Processing System is checked for accuracy through case review.

The Quality Control Specialist:

- a) Reviews cases having a single custodial parent or caretaker relative with a child less than six years of age as of the end of the review month.
 - b) Verifies that the age of the youngest child is correct through information found in the Massachusetts' Automated Data Processing System or from birth certificate in case record.
 - c) Determines through Massachusetts' Automated Data Processing System, Career Centers' Providers or the case record that the single custodial parent or caretaker relative was participating in a core work activity for 20 hours or more during the review.
- 2) Procedures used to ensure that a family is not disregarded from the work participation rate for more than three months in any period of 12 consecutive months based on a work-eligible individual's refusal to participate in work.

Massachusetts reports on a sample for TANF. Each sample case is reviewed for accuracy in information and documentation by a Quality Control Specialist. The information in Massachusetts' Automated Data Processing System is checked for accuracy through case review.

Massachusetts' Work Verification Plan

The Quality Control Specialist:

- a) Reviews cases with a disregarded household member.
 - b) Verifies that the sanction is a work program sanction.
 - c) Reviews Massachusetts' Automated Data Processing System history for the past 12 months to determine the number of months a recipient was sanctioned and that the sanction has not lasted more than 3 months within the last 12 months.
 - d) Compares Massachusetts' Automated Data Processing System counter and case reviews.
 - e) Uses the verified amount for reporting purposes if there are any discrepancies.
- 3) Procedures used to ensure that a family is not disregarded from the work participation rate for more than 12 months per lifetime based on being a single custodial parent with a child less than one year of age.

Massachusetts reports on a sample for TANF. Each sample case is reviewed for accuracy in information and documentation by a Quality Control Specialist. The information in Massachusetts' Automated Data Processing System is checked for accuracy through case review.

The Quality Control Specialist:

- a) Reviews cases with a single custodial parent with a child less than one year of age.
- b) Determines through Massachusetts' Automated Data Processing System and matches that no other parent is in the home and that as of the end of the review months there is a child under the age one.
- c) Verifies through Massachusetts' Automated Data Processing System history that the 12 months disregard has not been used, taking into consideration any information not considered due to cases closing and then reopening.