

WEST VIRGINIA TEMPORARY ASSISTANCE FOR NEEDY FAMILIES

WORK VERIFICATION PLAN FY 2024

This is to certify that this West Virginia (WV) Work Verification Plan includes all the information required by the regulations at 45 CFR Parts 261, 262, 263, and 265 and accurately reflects the provisions under which the State is operating as of November 1, 2023.

I. COUNTABLE WORK ACTIVITIES

A. CORE - ACTIVITIES

1. Unsubsidized Employment

Unsubsidized employment includes all paid employment that is not subsidized by TANF or any other public program, including self-employment. The employee may receive a subsidy in the form of support service payments to aid in maintaining employment. Recipients whose employers claim a tax credit for hiring economically disadvantaged workers are considered to be in unsubsidized employment.

WV WORKS is WV's TANF program and is a work first program. West Virginia will increase the focus on finding employment for TANF recipients by working more closely with the Workforce Development Boards (WDBs) and the WV Bureau of Employment Programs (BEP). In addition, an individual who has applied and is approved for WV WORKS benefits must have good cause for not participating in a work activity or be engaged in an activity no later than the end of the 2nd month of benefit receipt or is ineligible.

Employment Support Options are for WV WORKS participants who become employed and who are no longer income eligible for cash assistance or who chose to have their case closed due to employment, may choose from continuing to receive support service payments, or the West Virginia Employment Assistance Program (EAP). To be eligible for EAP, a single parent with a child under six must be employed at least 20 hours per week; all other parents must be employed at least 30 hours per week.

a. Support Service Payments and Services are Available to Participants in Unsubsidized Employment

These support service payments and services are available to employed participants who continue to receive cash assistance and for a six month period, to participants who started employment and are no longer eligible to receive cash assistance but remain under the 150% Federal Poverty Level (FPL) income limit.

Available support service payments and services include, but may not be limited to:

- transportation
- collateral payments
- car repair
- clothing
- car insurance
- license(driver's or professional license fees)
- tools or equipment
- relocation
- referrals to child care agencies
- referrals to any other agencies or programs
- DUI classes
- GED or High School Diploma Achievement Bonus
- Self-Sufficiency Achievement Bonuses
- Vocational Educational and Employment Achievement Bonus
- Participation Achievement Bonus (200% FPL)

b. Employment Assistance Program (EAP)

This program is for former WV WORKS participants who find employment and are no longer eligible to receive cash assistance or have requested their assistance to stop due to employment but remain under the 150% FPL income limit. These participants may now opt to continue to receive WV WORKS cash assistance based on a 100% earned income disregard for the six-month period following WV WORKS case closure. Documentation of hours for participants who choose the EAP is the same as for unsubsidized employment.

c. Documentation of Unsubsidized Employment

(1) Documentation of Hours for Unsubsidized Employment with an Employer

- WV WORKS Case Managers obtain verification of countable hours of participation based on signed employer reports, pay stubs, or other employer-issued documentation substantiating the number of hours worked. This includes hours for which the individual is paid, but does not work, including paid leave and paid holidays. These records serve as the documentation and verification of hours worked and are retained in the participant's electronic case record (OnBase) and recorded in case comments in the Electronic West Virginia People's Access to Help (WV PATH)
- The hours of participation may be projected in unsubsidized employment for up to six months. The number of hours projected will be based on 30 days of

pay stubs or wage statements and these actual hours will be used to project the participant's participation up to a six month period unless the State becomes aware of a change in circumstances that requires a recalculation. These pay stubs/wage statements must be from the preceding 30 day period. If the wage statements/pay stubs available are not representative of continuing circumstances, the actual hours must be reported each month and participation hours will not be projected. This is the same method used by the WV WORKS Case Manager to determine the work-eligible individual's cash assistance grant for the family.

- Employed participants who continue to receive cash assistance will be required to report changes in employment status, work hours, or rates of pay within a 10 day period.

To receive support service payments, employed participants who continue to receive cash assistance, will submit a monthly timesheet. The DFA-TS-12 form, See Appendix B, is the standard time sheet used to document participation and to verify the number of days and hours the participant has worked each month. This form contains the participant's name, actual hours completed, employer or work site name, work site supervisor's name, and the name and phone number of the person responsible for verifying the hours. This timesheet will be signed by the site supervisor and the individual reporting the hours. The timesheet must be submitted monthly, by the fifth working day of the month following the participation month. An employer/sponsor timesheet is acceptable verification as long as it provides the required information and is signed by the sponsor. The written verification serves as supporting documentation that the hours of participation were actually performed for the hours claimed in the work activity. The WV WORKS Case Manager monitors the written verification and records the actual participation hours in WV PATH for participation rate purposes. Pay stubs must not be used to verify number of days worked.

(2) Documentation of Hours for Self-Employed Participants

The reported gross business income minus business expenses will be the income used to determine eligibility and the amount of the TANF grant as this is comparable to the manner in which other employed applicants' eligibility is determined. For participation hours, the number of hours of

self-employment counted towards participation is determined by calculating the individual's gross earned income, less business expenses, divided by the Federal minimum wage. If the number of recordable participation hours does not meet the family's required hours, an additional placement must be made to reach the required number of hours for that household. To receive support service payments, a timesheet, DFA-TS-12, must be submitted to verify the number of days worked each month.

2. Subsidized Private Employment

Subsidized private sector employment means employment in the private sector for which the employer receives a subsidy from TANF or other public funds to offset some or all of the wages and costs of employing a recipient. In accordance with §9.9.13 of the West Virginia State Code, the subsidized positions should lead to ongoing, stable employment or prepare individuals for such employment.

The provisions covered under DRA are as follows:

- Work supplementation where TANF funds that would otherwise be used as the cash assistance payment are used to pay the employer;
- A third-party contractor, such as temporary staffing agencies, must serve as the employer of record and is paid a fee to cover salary, expenses, and success in placing employees; and
- Supported work for individuals with disabilities in an integrated setting.

West Virginia has one subsidized employment program offered by the Department of Human Services (DoHS). It is the Employment Subsidy Program (ESP); the ESP is a subsidized employment placement program. Eligible WV WORKS participants will be referred by local WV WORKS staff for placement in full-time private subsidized employment positions. Priority is to be given to those WV WORKS participants who require necessary work experience and job skills in order to enter unsubsidized employment. Subsidized employment placements will be for up to 6 months. Reimbursement will be 100% of the individual's wage. Only Work-Eligible Individuals in active WV WORKS cases may be referred for ESP placement. Referrals are made by WV WORKS staff to local employers.

- a. Appropriate Support Service Payments and Services are available to participants in Subsidized Private Employment.

Support service payments and services are available to participants in subsidized employment who continue to receive cash assistance and are also available for a six month period to participants who started employment and are no longer eligible to receive cash

assistance or have requested their assistance to stop due to employment but remain under the 150% FPL income limit. These participants may now opt to continue to receive WV WORKS cash assistance based on a 100% earned income disregard through the EAP. Documentation of hours for participants who choose the EAP is the same as for unsubsidized employment.

b. Documentation of Hours for Subsidized Private Employment

- WV WORKS Case Managers may use pay stubs, written signed verification from the employer stating hours worked and rate of pay, timecards, sign in and sign out sheets, or rosters to verify hours of participation. The approved method of determining participation hours will be verification of 30 days of pay stubs or signed employer wage statements and reporting the actual hours worked. These pay stubs/wage statements must be from the preceding 30 day period. This is the same method used by the WV WORKS Case Manager to determine the work-eligible individual's cash assistance grant for the family;
- Participation hours may not be projected based on the number of hours specified in the subsidized employment contract. Projected hours must be based on actual documented hours and will be used to project the participant's participation up to a six month period unless the State becomes aware of a change in circumstances that requires a recalculation. If the wage statements/pay stubs available are not representative of continuing circumstances, the actual hours recorded each month will be reported and participation hours will not be projected.
- Employed participants who continue to receive cash assistance are required to report changes in employment status, work hours, or rates of pay within a 10 day period.

To receive support service payments, employed participants who continue to receive cash assistance will submit a monthly timesheet. The DFA-TS-12 is the standard timesheet used to document participation hours and to verify the number of days and hours the participant has worked each month. This form contains the participant's name, actual hours completed, employer or work site name, work site supervisor's name, and the name and phone number of the person responsible for verifying the hours. This timesheet will be signed by the site supervisor and the individual reporting the hours. The timesheet must be submitted monthly, by the fifth working day of the month following the participation month. An employer/sponsor timesheet is acceptable verification as long as it provides the required information and is signed by the

sponsor. The written verification serves as supporting documentation that the hours of participation were actually performed for the hours claimed in the work activity. The WV WORKS Case Manager monitors the written verification and records the actual participation hours in WV PATH for participation rate purposes. Pay stubs must not be used to verify number of days worked.

3. Subsidized Public Employment

Subsidized public sector employment means employment in the public sector for which the employer receives a subsidy from TANF or other public funds to offset some or all of the wages and costs of employing the recipient. In accordance with §9.9.13 of the West Virginia State Code, the subsidized positions should lead to ongoing, stable employment or prepare individuals for such employment.

West Virginia has one subsidized employment program offered by the DoHS. It is the ESP; the ESP is a subsidized employment placement program. Eligible WV WORKS participants will be referred by local WV WORKS staff for placement in full-time public subsidized employment positions. Priority is to be given to those WV WORKS participants who require necessary work experience and job skills in order to enter unsubsidized employment. Subsidized employment placements will be for up to 6 months. Reimbursement will be 100% of the individual's wage. Only Work-Eligible Individuals in active WV WORKS cases may be referred for ESP placement. Referrals are made by WV WORKS staff to local employers.

- a. Appropriate Support Service Payments and Services are made available to participants in Subsidized Public Employment.

Support service payments and services are available to employees who continue to receive cash assistance and also available for a six month period to participants who started employment and are no longer eligible to receive cash assistance or have requested their assistance to stop due to employment but remain under the 150% FPL income limit. These participants may now opt to continue to receive WV WORKS cash assistance based on a 100% earned income disregard through the EAP. Documentation of hours for participants who choose the EAP is the same as for unsubsidized employment.

- b. Documentation of Hours for Subsidized Public Employment:

- WV WORKS Case Managers may use pay stubs, written signed verification from the employer stating hours worked

and rate of pay, time cards, sign in and sign out sheets, or rosters to verify hours of participation. The approved method of determining participation hours will be verification of 30 days of pay stubs and reporting the actual hours worked. These pay stubs/wage statements must be from the preceding 30 day period. These reports of pay will be the same used by the WV WORKS Case Manager to determine the work-eligible individual's cash assistance grant for the family;

- Participation hours may not be projected from the number of hours specified in the subsidized employment contract. Projected hours must be based on actual documented hours and will be used to project the participant's participation up to a six month period unless the State becomes aware of a change in circumstances that requires a recalculation. If the wage statements/pay stubs available are not representative of continuing circumstances, the actual hours reported each month will be reported and participation hours will not be projected.
- Employed participants who continue to receive cash assistance are required to report changes in employment status, work hours, or rates of pay within a 10 day period.
- To receive support service payments, employed participants who continue to receive cash assistance will submit a monthly timesheet. The DFA-TS-12 is the standard time sheet used to document participation hours and to verify the number of days and hours the participant has worked each month. This form contains the participant's name, actual hours completed, employer or work site name, work site supervisor's name, and the name and phone number of the person responsible for verifying the hours. This timesheet will be signed by the site supervisor and the individual reporting the hours. The timesheet must be submitted monthly, by the fifth working day of the month following the participation month. An employer/sponsor timesheet is acceptable verification as long as it provides the required information and is signed by the sponsor. The written verification serves as supporting documentation that the hours of participation were actually performed for the hours claimed in the work activity. The WV WORKS Case Manager monitors the written verification and records the actual participation hours in WV PATH for participation rate purposes. Pay stubs must not be used to verify number of days worked.

4. Work Experience

Work Experience, including work associated with the refurbishing of publicly assisted housing, if sufficient private sector employment is not available, is a work activity performed in return for cash assistance that provides an individual with an opportunity to acquire the general skills, training, knowledge, and work habits necessary to obtain employment. The purpose of work experience is to improve the employability of those who cannot find unsubsidized employment. This activity is supervised by an employer, work site sponsor, or other responsible party on an ongoing basis no less frequently than daily. The Fair Labor Standards Act (FLSA) applies to assignment of hours of participation in all work experience placements. The participant cannot be required to participate in this activity for more hours than the net monthly TANF cash assistance amount plus the monthly Supplemental Nutrition Assistance Program (SNAP) amount divided by the Federal or State minimum wage, whichever is higher. The net monthly TANF assistance amount is determined by adding the TANF grant, the Child Support Incentive and pass-through payments and deducting any child support that is being retained by the State. Participants who participate for the maximum hours allowed under the minimum wage requirements of FLSA are considered to have satisfied the weekly number of core activity hours. West Virginia operates a SNAP Workfare Program and a mini-Simplified SNAP Program (mini-SSNAP) for TANF recipients, which allows the State to combine the value of TANF and SNAP benefits in the determination of maximum hours. The hours of work experience participants are regulated under the FLSA.

Participants in Work Experience can be deemed to have met core hours if they participated for the maximum hours allowed by FLSA. Any additional hours necessary must be assigned and met by completing other countable work activities not covered by FLSA.

Participants are assigned a Work Experience provider and receive daily supervision. The requirement for daily supervision is part of a formal agreement between the Department and a work experience provider. The work experience provider agrees to notify the Department immediately if the individual does not perform satisfactorily and/or fails to arrive at the work site at the agreed upon time.

West Virginia has two work experience programs offered by the DoHS. They are the Community Work Experience Program (CWEP) and the Joint Opportunities for Independence Program (JOIN).

a. CWEP

CWEP is a work activity for parents or other caretaker relatives. The primary purpose is to provide work experience and training to assist a participant who has limited work experience, is under-employed or has no immediate employment opportunities. CWEP sponsors are limited to public agencies, such as federal, local, state, and not-for-profit employers. It is limited to public services projects in fields such as health, social services, environmental protection, education,

urban and rural development and redevelopment, welfare, recreation, public activities, public safety, and child care.

b. JOIN

JOIN is a work program that provides the participant the opportunity to participate in a work program that closely resembles full-time employment. The work experience must meet local labor market demands. If the program does not meet the criteria for an internship or work experience, then it may be subject to FSLA rules. The JOIN contractor must meet the same requirements as an Employer Incentive Program (EIP) contractor, but the participant continues to receive cash assistance during the period he is placed with the business. The employer provides a \$1.00 per hour training allowance to the participant which must be paid on the regularly scheduled payday. Any plan or curriculum for the participant is made individually by the employer in conjunction with the case manager. A review of the participant's progress must be conducted at the end of the first six months of participation or earlier, to determine if there is satisfactory progress toward the goal of employment. The expected result of JOIN participation is employment, either at the JOIN training site or with another employer.

c. Appropriate Support Service Payments and Services are Available to Participants in Work Experience.

All support services and payments are available to participants in this component.

d. Documentation of Hours for Work Experience

Work Experience providers report actual hours of participation on time sheets for participation for every day in each month. The work experience provider and the participant sign the time sheet. The DFA-TS-12 is the standard time sheet used to document participation hours and to verify the number of days and hours the participant has worked each month. This form contains the participant's name, actual hours completed, employer or work site name, work site supervisor's name, and the name and phone number of the person responsible for verifying the hours. This timesheet will be signed by the site supervisor and the individual reporting the hours. The timesheet must be submitted monthly, by the fifth working day of the month following the participation month. A sponsor timesheet is acceptable verification as long as it provides the required information and is signed by the sponsor. The written verification serves as supporting documentation that the hours of participation were actually performed for the hours claimed in the Work Experience activity. The WV WORKS Case Manager monitors the written verification and records the actual participation hours in WV PATH for participation rate purposes along with comments

explaining why core hours are being deemed to meet participation hours. This information is retained in the case record and recorded in case comments in the WV PATH system.

5. On-the-Job Training

On-the-Job Training (OJT) means training in the public or private sector that is given to a paid employee while he or she is engaged in productive work that provides knowledge and skills essential to the full and adequate performance of the job. OJT must be supervised by an employer, work site sponsor, or other responsible party on an ongoing basis no less frequently than daily.

States may subsidize the employer to offset training costs using the contract since the placement provides on-site training in the skills and knowledge essential to job performance. WV currently operates one type of supported OJT, the Employer Incentive Program (EIP).

Under the EIP, the State contracts with both public and private sector employers to subsidize the OJT period of the employee. Under the contract the employer provides structured skill training, the opportunity to improve skill level, and provides individuals with marginal employment skills to obtain employment with the promise of completing a training period that will increase their skills with the expectation of unsubsidized employment at the end of the contract period. This program does not meet the definition of subsidized employment because the contract covers only a period related to the length of the training period. The length of the contract is determined by the length of time of the training required for the job and the participant's starting hourly wage, which must be equal to or above the current minimum wage. The amount paid by DoHS is equal to 50% of the participant's hourly wage times the hours worked. The occupation must require a training period of at least 400 hours. The maximum number of hours covered by the contract will not exceed 600 hours. At the end of each month, the contractor is required to submit a timesheet documenting the number of hours and days the participant worked.

The contractor completes a job description which outlines what qualifications are necessary and what skills will be obtained during the training period. The WV WORKS Case Manager and participant determine if the placement will be suitable for the participant's skill level and needs. In accordance with §9.9.13 of the West Virginia State Code, the employer must make a commitment to retain the employee at the end of the contract period.

This activity would also include any OJT programs or contracts that may exist for individuals written by other local, county, or state agencies such as WORKFORCE WV, Division of Rehabilitation Services, etc. All OJT contracts established by other agencies will be reviewed by DoHS to ensure they meet the statutory definition of OJT. Any questions regarding these contracts will be submitted for review to the State TANF Policy Unit.

- a. Appropriate Support Service Payments and Services are Available to Participants in OJT.

All support services and payments are available to participants in this component.

- b. Documentation of Hours for OJT

Participation Hours may not be projected from the number of hours specified in the OJT contract. Hours are not projected for this activity.

The State will use pay stubs, written signed verification from the employer stating hours worked and rate of pay, time cards, sign in and sign out sheets, or a time sheet to verify hours of participation. The DFA-TS-12 is the standard time sheet used to document participation hours and to verify the number of days the participant has worked each month. This form contains the participant's name, actual hours completed, employer or work site name, work site supervisor's name, and the name and phone number of the person responsible for verifying the hours. This timesheet will be signed by the site supervisor and the individual reporting the hours. The timesheet must be submitted monthly, by the fifth working day of the month following the participation month. A sponsor timesheet is acceptable verification as long as it provides the required information and is signed by the sponsor. The written verification serves as supporting documentation that the hours of participation were actually performed for the hours claimed in the work activity. The WV WORKS Case Manager monitors the written verification and records the actual participation hours in WV PATH for participation rate purposes. OJT providers submit the monthly timesheet containing the actual hours worked as part of their contractual obligation.

6. Job Search and Job Readiness Assistance

This has been defined as the act of seeking or obtaining employment, preparation to seek or obtain employment including life skills training, substance abuse treatment, mental health treatment, or rehabilitation activities. Job Search and Job Readiness Assistance activities must be supervised by the WV WORKS Case Manager or other responsible party on an ongoing basis no less frequently than daily. Structured Job Search must be operated by a contractor, another agency, or by WV WORKS staff under the guidelines established and defined by the Department. Existing programs offered through WORKFORCE WV, Department of Education, and other approved agencies must be used.

- a. Activities

Job Search and Job Readiness Assistance consist of two activities:

- Preparing an individual to obtain employment by preparing a resume, applications, training in interviewing skills and work place expectations and life skills training; and
- Substance abuse treatment, mental health, or rehabilitation activities.

Currently WV has one Job Search and Job Readiness Assistance program. SPOKES is an open entry job preparation/job assistance/job search program with a life skills component that is acceptable under the federal definition. Held in four one-week modules, WV WORKS participants can be placed in this program on any given Monday. This program is administered by the WV Department of Education. The Job Coach works closely with the WDBs and with local Job Service to find employment for the participants as they finish the program. For these Job Search and Job Readiness activities, the instructor maintains a log of daily attendance by participants and provides instruction and guidance to participants and provides daily supervision.

The Emotional Health Inventory (EHI) screening is administered to all WV WORKS recipients to determine if there may be mental health or substance use issues. Based on the results, the case manager makes appropriate referrals to mental health facilities and substance abuse programs. Questions on the Initial Self-Sufficiency Appraisal and the Learning Needs Screening regarding possible substance use and mental health issues may also generate a referral.

- b. Approved Support Service Payments and Services are available to participants in Job Search and Job Readiness activities.

All support service payments and services are also available individuals in this component.

- c. Documentation of Job Search and Job Readiness Assistance

West Virginia will have no unstructured Job Search and Job Readiness Assistance activities. Participation in the Job Search and Job Readiness Assistance programs will be documented and supervised on a daily basis. The time to and from the work site may not be counted as participation. However, the time traveling in between multiple interviews may be counted as participation.

Service providers and instructors are required to submit information to WV WORKS Case Managers verifying daily attendance. The DFA-TS-12 is the standard time sheet used to document participation hours and to verify the number of days and hours the participant has worked each month. This form contains the participant's name, actual hours completed, employer or work site name, work site supervisor's name, and the name and phone

number of the person responsible for verifying the hours. This timesheet will be signed by the site supervisor and the individual reporting the hours. The timesheet must be submitted monthly, by the fifth working day of the month following the participation month. A sponsor timesheet is acceptable verification as long as it provides the required information and is signed by the sponsor. The written verification serves as supporting documentation that the hours of participation were actually performed for the hours claimed in the activity. The WV WORKS Case Manager monitors the written verification and records the actual participation hours in WV PATH for participation rate purposes. Reporting any hours of this activity in a week triggers the counting of one of the time-limit weeks for the four-week limit. The six-week limit is converted to hours (120 hours for families with a requirement of 20 hours per week or 180 hours for a family with a requirement of 30 hours per week).

The limit is six weeks for the last 12-month period, no more than four of which may be consecutive. All time in this activity returned to zero hours beginning October 1, 2008. For Job Search and Job Readiness, a week of participation may begin any time and ends 20 or 30 hours later, regardless of the number of days the individual participated during those hours. For a single parent with a child under age six, a week is equivalent to 20 hours. For all other Work-Eligible Individuals, a week is equivalent to 30 hours. Each parent in a two-parent household has his own limit. Changes in the hourly requirement due to the child's age or changes in household composition are effective the month after the change occurs.

West Virginia may qualify to count up to 6 additional weeks for participation credit in Job Search and Job Readiness when declared a needy state by ACF. When this occurs the time limit will be 240 hours for an individual with 20 hours per week work requirement or 360 hours for an individual with 30 hours per week work requirement. The limit will be 12 weeks per the last 12 month period, no more than 4 of which may be consecutive. All other activity requirements and restrictions remain the same. Changes in the hourly requirement due to changes in WV's status as a needy state are effective the month after the change occurs.

The WV PATH computer system controls and the functional edits built into the reporting programs do not allow reporting of more than 120 or 240 hours total for families with a requirement of 20 hours per week or 180 or 360 hours total for a family with a requirement of 30 hours per week of Job Search and Job Readiness Assistance in any 12 month period and also will not report more than four consecutive weeks. The system programs do not allow for manual intervention at this level, therefore there is no room for human error in the information that is included in the reports sent to ACF. The coding of these reports has been successfully tested for quality and accuracy. In addition, to ensure the case manager does not allow

the WV WORKS participant to remain in any component incorrectly, an anticipated end date for all work activity components for all WV WORKS participants is entered into WV PATH. When the participant is assigned to the Job Search and Job Readiness component, the end date will be assigned to end in conjunction with the correct time limit. The WV WORKS Case Manager receives a system generated message to the case manager that notifies the user that a situation exists on a case which requires attention, when a participant is completing a component. This task reminder is received three working days before the anticipated end date. At that time, the worker will reassign the participant to a new countable work activity. The WV WORKS Case Manager will receive WV PATH task reminder when a component is completed for an enrolled participant and 14 days has passed since the actual end date if a new component has not been assigned.

All contractors for this activity are advised of the time limits and these limits are included in their work plans and are included in their contractual obligation.

5. Community Service Programs

Community Service programs are defined as structured programs and embedded activities in which TANF recipients perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community Service programs must be limited to projects that serve a useful community purpose in fields such as health, social service, environmental protection, education, urban and rural redevelopment, welfare, recreation, public facilities, public safety, and child care. Community Service programs are designed to improve the employability of recipients not otherwise able to obtain employment and must be supervised on an ongoing basis no less frequently than daily. The WV WORKS Case Manager must take into account, to the extent possible, the prior training, experience, and skills of a recipient in referring TANF recipients to appropriate Community Service activities.

All Community Service participation must be with agencies or non-profit service organizations and include verification of work hours and duties. Participation in this activity must be short-term, provide needed work skills and experience to the participant and serve a needed service for the community. Hours assigned for this activity will follow the FLSA guidelines as advised in the DRA of 2005. The participant cannot be required to participate in this activity for more hours than the net monthly TANF cash assistance amount plus the monthly SNAP amount divided by the Federal or State minimum wage, whichever is higher. The net monthly TANF assistance amount is determined by adding the TANF grant, the Child Support Incentive and pass-through payments and deducting any child support that is being retained by the State. Participants in Community Service activities can be deemed to have met core hours if they participate for the maximum number of hours allowed by the FLSA. WV operates a

SNAP Workfare Program and a mini-SSNAPP for TANF recipients, which allows the State to combine the value of TANF and SNAP benefits in the determination of maximum hours. All community service participants are regulated under the FLSA. Any additional hours necessary must be assigned and met by completing other countable work activities not covered by FLSA.

a. Self-Initiated Community Service

West Virginia will permit self-initiated Community Service under the following conditions:

Participants must find their own volunteer positions with an appropriate local community service agency. A volunteer job description must be provided by the Community Service agency. This description must define the volunteer service, what tasks will be completed and what service the volunteer work is providing for the community, what skills and education are needed to perform the tasks, the number of hours per week the volunteer will be used, the contact person, and the length of time their services will be needed.

Based on the Self-Sufficiency Appraisal completed by the participant, the WV WORKS Case Manager will work with the participant and the Community Service Provider to determine how this activity will benefit the participant and enhance their job skills. The service provider will also identify when the activity should be reviewed and set up regular appointments to evaluate their progress. A copy of the job description will be placed in the case record and clearly documented in case comments in WV PATH. Community Service activities must end when no additional job skills are being learned. The case manager should be in close contact with the agency to identify when the skills have been learned and the activity is no longer enhancing the participant's marketability. At that time the participant should be directed toward obtaining employment and use the Community Service experience as work experience and as a work reference.

- The requirement for daily supervision is part of a formal agreement between the Department and the Community Service provider. The Community Service provider agrees to notify the Department immediately if the individual does not perform satisfactorily and/or fails to arrive at the work site at the agreed upon time.

b. Appropriate Support Service Payments and Services are Available to Participants in Community Service Activities.

All support service payments and services are available individuals in this work activity.

c. Documentation of Hours for Community Service Placements

Community Service agencies report actual hours of participation on time sheets for participation for every day in each month. The DFA-TS-12 is the standard time sheet used to document participation hours and to verify the number of days and hours the participant has worked each month. This form contains the participant's name, actual hours completed, employer or work site name, work site supervisor's name, and the name and phone number of the person responsible for verifying the hours. This timesheet will be signed by the site supervisor and the individual reporting the hours. The timesheet must be submitted monthly, by the fifth working day of the month following the participation month. An employer/sponsor timesheet is acceptable verification as long as it provides the required information and is signed by the sponsor or his representative. The written verification serves as supporting documentation that the hours of participation were actually performed for the hours claimed in Community Service. The WV WORKS Case Manager monitors the written verification and records the actual participation hours for participation rate purposes and the details on why the participant's hours are deemed to have met the core hour requirement. This information is retained in the case record and recorded in case comments in the WV PATH system.

6. Vocational Educational Training

These are organized educational programs that are directly related to the preparation of individuals for employment in current or emerging occupations requiring training including vocational rehabilitation, job skills training and associate or baccalaureate degree programs. For distance learning, countable participation hours only include classes which allow for monitoring of the participant while logged in and summarize what is achieved during the time period engaged. Vocational Educational Training must be supervised on an ongoing basis no less frequently than daily. Up to one hour of unsupervised homework time for each hour of class time may be counted for participation. No additional hours of study will be reported unless they are monitored hours in an approved educational program and as long as the sum of all homework time reported does not exceed what is recommended by the institution. Faculty, instructors, instructional aides, lab supervisors, study hall supervisors, contractors and educational providers are examples of educational staff that may be responsible for daily supervision of assigned participants.

Although Vocational Educational Training programs may be longer than a 12 month period, this placement may only be counted for 12 months lifetime towards meeting the federal participation requirements.

The WV PATH system controls and the functional edits built into the reporting programs do not allow reporting of more than 12 months of vocational education in a lifetime. The system programs do not allow for manual intervention at this level, therefore there is no possibility for human error in the information that is included in the reports sent to ACF. The coding of these reports has been successfully tested for quality and accuracy. In addition, the WV WORKS Case Manager enters an anticipated end date for all work activity components for all WV WORKS participants. When the participant is assigned to the Vocational Education component, the end date will be assigned to end in conjunction with the training completion date. When the vocational educational activity ends, the WV WORKS Case Manager receives WV PATH task reminder, a system generated message to the WV PATH user that notifies the user that a situation exists on a case which requires attention, when a participant is completing a component. This task reminder is received three working days before the anticipated end date. At that time, if appropriate, the worker will reassign the participant to a new countable work activity. The WV WORKS Case Manager will receive WV PATH task reminder when a component is completed for an enrolled participant and 14 days has passed since the actual end date if a new component has not been assigned.

West Virginia includes the following programs under this activity:

- Vocational associate degree programs consist of both academic and vocational for-credit course work that usually requires about 60 credits. Completion of these programs can provide an Associate of Arts (AA), Associate of Science (AS) or Associate of Applied Science (AAS) degree in fields defined as vocational. Common fields of study include: agricultural business and production, business, computer and information science, engineering, health-related professions, communication technologies, personal services, protective services, construction, automotive technology, and transportation. Associate degree programs can take two or more years to complete. Because they generally combine coursework with actual work, some portion could be counted as vocational educational training, while some could be counted as OJT, if paid, or work experience, if unpaid. See Appendix A;
- Instructional certificate programs are generally programs designed to upgrade job-related skills. These programs generally require about one year to complete and, compared to associate degree programs, involve far less, if any, academic courses. However, certificates can be of varied duration and can be earned for quite diverse activities. Examples range from a floral arranging program lasting only a few weeks to a two-year certificate program in airframe and power plant. Like associate degree programs, these certificates are awarded by institutions based on credits accumulated. See Appendix A;

- Industry skill certifications are industry-developed certificates for students who demonstrate specific skills, often through a test. Preparation for these tests includes self-study and courses offered at postsecondary institutions and other training providers;

Noncredit course work is designed to accommodate those who want specific job-related skills. For example, this could include: Introduction to Windows 98, 3 hours; Introduction to Fiber Optics, 20 hours; Catering and Food Preparations, 96 hours; and Real Estate License Exam Preparation, 20 hours. The amount of time to complete the coursework for a specific skill can vary significantly and can consist of stand-alone courses or sequenced courses in a non-degree granting program.

- Vocational rehabilitation activities that are organized educational programs directly related to preparing individuals for employment in current or emerging occupations.
- Associate or Baccalaureate Degree programs for up to the 12 month lifetime period.

a. Documentation of Hours for Vocational Educational Programs

Vocational Educational Training providers and program participants report actual hours of participation on time sheets for participation for every day in each month. Actual hours spent in class as well as time spent performing clinical requirements or lab time required for approved Vocational Educational Training programs are considered to be a part of the primary activity for which it is required and is countable. Time spent in supervised study halls is also countable in addition to one hour of unsupervised homework time for each hour of class time as long as the sum of all homework time reported does not exceed what is recommended by the institution. Educational providers are responsible for daily supervision of assigned participants and must submit documentation of total hours of participation in their program. The DFA-TS-12 is the standard time sheet used to document participation days and hours and to verify the number of days the participant has worked each month. This form contains the participant's name, actual hours completed, vocational school name, educational supervisor's name, and the name and phone number of the person responsible for verifying the hours. This timesheet will be signed by the educational supervisor and the individual reporting the hours. The timesheet must be submitted monthly, by the fifth working day of the month following the participation month. A time sheet provided by the educational provider is acceptable verification as long as it provides the required information and is signed by the educational provider. The written verification serves as supporting documentation that the hours of participation were actually performed for the hours claimed in the activity. The WV WORKS Case Manager monitors the written

verification and records the actual participation hours for participation rate purposes. This information is retained in the case record and recorded in case comments in the WV PATH system.

- b. Appropriate Support Service Payments and Services are available to participants in Vocational Educational Training.

All support services and payments are available to a participant in this component.

- c. Documentation of Progress in Vocational Educational Programs

For all school attendance, timesheets will be provided on a monthly basis during the school term. Enrollment and schedule information will be requested at the beginning of the term and copies of grades from each grading period will be obtained to insure that the participant continues to be in good standing at the school and making progress towards program completion in a timely manner, as appropriate for the course of study. Regular contact will be maintained with the teachers and the activity will be modified if progress is not on-going.

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

This means providing child care to enable another TANF recipient to participate in a Community Service program. This does not include providing child care to enable a TANF recipient to participate in any of the other allowable work activities. This activity must be supervised on an ongoing basis no less frequently than daily. In a two-parent family, one parent cannot receive participation credit for providing child care for his or her own child while the other parent participates in a Community Service program. Although the child care agency supervises certification activities, the participant completing the community service activity is responsible for verifying the hours and providing daily supervision of the participant providing the child care.

This activity provides child care only for other participants who are in a community service activity and should be restricted to those participants who wish to obtain child care certification.

- The participant providing care will be referred to and work with a child care agency to become a certified provider. There is a great demand for in-home child care providers throughout the State. By focusing this component on obtaining certification, other participants and low income households would benefit.
- WV WORKS Case Managers will work with the participant to insure the participant is working with a child care agency and moving towards obtaining their certification.

- Unless unexpected obstacles are identified, a participant in this activity should be able to obtain a child care certificate and become gainfully employed as a child care provider within a six month period.
- Placements in this activity should be time-limited and closely monitored by the WV WORKS Case Manager to insure the participant is making satisfactory progress toward obtaining their certification.
- Trained workers may serve as mentors for other participants pursuing certification.

a. Documentation of Hours for Providing Child Care Services to an Individual who is participating in a Community Service Program

Program participants report actual hours of participation on time sheets for participation for every day in each month. The Community Service participant and the Child Care Agency sign the time sheet attesting to the truthfulness of the information provided. The DFA-TS-12 is the standard time sheet used to document participation days and hours and to verify the number of days the participant has worked each month. This form contains the participant's name, actual hours completed, employer or work site name, work site supervisor's name, and the name and phone number of the person responsible for verifying the hours. The timesheet must be submitted monthly, by the fifth working day of the month following the participation month. A child care provider's timesheet is acceptable verification as long as it provides the required information and is signed by the Community Service participant and the child care provider. This documentation is submitted to the WV WORKS Case Manager. The written verification serves as supporting documentation that the hours of participation were actually performed for the hours claimed in the provision of child care services. The WV WORKS Case Manager monitors the written verification and records the actual participation hours for participation rate purposes. This information is retained in the case record and recorded in case comments in the WV PATH system.

b. Appropriate Support Service Payments and Services are available to participants in this component

- Support Service Payments will be made available to these participants to assist them in meeting the State certification requirements.
- This activity may require additional non-assistance payments made available to participants in this component to cover costs of equipment like child safety gates or kitchen

equipment when funding is not available through other sources.

B. NON-CORE ACTIVITIES

Hours for non-core activities will only count towards participation once the Assistance Group has met its required core hours. Under WV State Law, WV WORKS recipients may elect to participate in an educational activity regardless of these restrictions. Integrated basic education or ESL may also be included in these activities regardless of the duration. For distance learning, countable participation hours only include classes which allow for monitoring of the participant while logged in and summarize what is achieved during the time period engaged.

1. Job Skills Training Directly Related to Employment

Job Skills Training directly related to employment means 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. It includes both customized and general training to prepare an individual for employment, including literacy and language instruction, if necessary to enable the participant to perform a specific job or engage in a specific job training program. Job Skills Training directly related to employment must be supervised on an ongoing basis no less frequently than daily. Faculty, instructors, instructional aides, lab supervisors, study hall supervisors, contractors and educational providers are examples of educational staff that must be responsible for daily supervision of assigned participants.

a. Documentation of Hours for Job Skills Directly Related to Employment

Job Skills Training providers and program participants report actual hours of participation on time sheets for participation for every day in each month. Actual hours spent in class as well as time spent performing clinical requirements or lab work required for approved training programs are considered to be a part of the primary activity for which it is required and is countable. Time spent in supervised study halls is also countable in addition to one hour of unsupervised homework time for each hour of class time as long as the sum of all homework time reported does not exceed what is recommended by the institution. Educational providers are responsible for daily supervision of assigned participants and must submit documentation of total hours of participation in their program. The DFA-TS-12 is the standard time sheet used to document participation days and hours and to verify the number of days the participant has attended each month. This form contains the participant's name, actual hours completed, employer or work site name, educational supervisor's name, and the name and phone number of the person responsible for verifying the hours. This timesheet will be signed by the site

supervisor and the individual reporting the hours. The timesheet must be submitted monthly, by the fifth working day of the month following the participation month. An agency or sponsor timesheet is acceptable verification as long as it provides the required information and is signed by the educational provider. The written verification serves as supporting documentation that the hours of participation were actually performed for the hours claimed in the educational activity. The WV WORKS Case Manager monitors the written verification and records the actual participation hours for participation rate purposes. This information is retained in the case record and recorded in case comments in the WV PATH system.

- b. Appropriate Support Service Payments and Services are available to participants in Job Skills Training Directly Related to Employment.

All support services and payments are available to participants in this component.

2. Education Directly Related to Employment

Education Directly Related to Employment, in the case of a recipient who has not received a high school diploma or a certificate of high school equivalency means education related to a specific occupation, job, or job offer. It includes: Adult Basic Education (ABE); English-as-a-Second-Language (ESL); literacy skills; and where required as a prerequisite for employment, education leading to a high school equivalency (HSE) diploma; testing to acquire HSE certification; and supervised homework and study activities in any educational program approved by the State Department of Education. Education Directly Related to Employment must be supervised on an ongoing basis no less frequently than daily. Adult participants who have not received a high school diploma or HSE and need further education to obtain a specific occupation, job, or job offer are placed in this activity. Faculty, instructors, instructional aides, lab supervisors, study hall supervisors, contractors and educational providers are examples of educational staff that must be responsible for daily supervision of assigned participants.

- a. Documentation of Hours for Education Directly Related to Employment

Education Directly Related to Employment providers and program participants report actual hours of participation on time sheets for participation for every day in each month. Actual hours spent in class as well as time spent in supervised study halls may be counted in addition to one hour of unsupervised homework time for each hour of class time as long as the sum of all homework time reported does not exceed what is recommended by the institution. Educational providers are responsible for daily supervision of assigned participants and must submit documentation of total hours of participation in their program. The DFA-TS-12 is the standard time

sheet used to document participation hours and to verify the number of days and hours the participant has attended each month. This form contains the participant's name, actual hours completed, site name, education site supervisor's name, and the name and phone number of the person responsible for verifying the hours. This timesheet will be signed by the education site supervisor and the individual reporting the hours. The timesheet must be submitted monthly, by the fifth working day of the month following the participation month. An agency/sponsor timesheet is acceptable verification as long as it provides the required information and is signed by the education provider. The written verification serves as supporting documentation that the hours of participation were actually performed for the hours claimed in the educational activity. The WV WORKS Case Manager monitors the written verification and records the actual participation hours for participation rate purposes. This information is retained in the case record and recorded in case comments in the WV PATH system.

b. Documentation of Progress for Education Directly Related to Employment

For all school attendance, timesheets will be provided on a monthly basis during the school term. Enrollment and schedule information will be requested at the beginning of the term and copies of grades from each grading period will be obtained to insure that the participant continues to be in good standing at the school and making progress towards course completion in a timely manner, as appropriate for the course of study. Regular contact will be maintained with the teachers and the activity will be modified if progress is not on-going.

c. Appropriate Support Service Payments and Services are available to participants in Education Directly Related to Employed

All support services and payments are available to participants in this component.

3. Satisfactory Attendance at Secondary School or in a Course of Study Leading to a General Education Development Certificate (GED)

Satisfactory attendance at secondary school or in a course of study leading to a GED in the case of a recipient who has not completed secondary school or received such a certificate, means regular attendance, in accordance with the requirements of the secondary school or course of study, at a secondary school or in a HSE course. This activity must be supervised on an ongoing basis no less frequently than daily. Faculty, instructors, instructional aides, lab supervisors, study hall supervisors, contractors and educational providers are examples of educational staff that must be responsible for daily supervision of assigned participants.

a. Documentation of Hours for Attendance at Secondary School or GED Course

Educational Providers and program participants report actual hours of participation on time sheets for participation for every day in each month. Actual hours spent in class as well as time spent in supervised study halls may be counted in addition to one hour of unsupervised homework time for each hour of class time as long as the sum of all homework time reported does not exceed what is recommended by the institution. Educational providers are responsible for daily supervision of assigned participants and must submit documentation of total hours of participation in their program. The DFA-TS-12 is the standard time sheet used to document participation hours and to verify the number of days and hours the participant has attended each month. This contains the participant's name, actual hours completed, education site name, education site supervisor's name, and the name and phone number of the person responsible for verifying the hours. This timesheet will be signed by the education site supervisor and the individual reporting the hours. The timesheet must be submitted monthly, by the fifth working day of the month following the participation month. An agency/sponsor timesheet is acceptable verification as long as it provides the required information and is signed by the sponsor or his representative. The written verification serves as supporting documentation that the hours of participation were actually performed for the hours claimed in the educational activity. The WV WORKS Case Manager monitors the written verification and records the actual participation hours for participation rate purposes. This information is retained in the case record and recorded in case comments in the WV PATH system.

b. Documentation of Satisfactory Progress at Secondary School or GED Course

For all school attendance, timesheets will be provided on a monthly basis during the school term. Enrollment and schedule information will be requested at the beginning of the term and copies of grades from each grading period will be obtained to insure that the participant continues to be in good standing at the school and making progress towards graduation in a timely manner, as appropriate for the course of study. Regular contact will be maintained with the teachers and the activity will be modified if progress is not on-going.

c. Appropriate Support Service Payments and Services are available to participants in Secondary School or GED Courses.

All support services and payments are available to a participant in this component.

C. OTHER WORK ACTIVITIES

The Other Work Activities component is used to track time spent on tasks leading to self-sufficiency which do not meet the definition of one of the countable work activities. Individuals placed in this component may still be considered in the federal participation rate calculation. This component will document the extent in which individuals are involved in other work-related activities that do not count toward the federal participation rates, but lead to their self-sufficiency. Allowable activities include all of the following, but may include other documented Personal Responsibility Contract (PRC) activities, agreed upon by the customer and the case manager:

- Appointments with local resources that may be assisting with barrier removal activities;
- Arranging for child care;
- Arranging for housing;
- Arranging for transportation or working with Good News Mountaineer Garage;
- Child Support meetings or hearings;
- Development of the PRC;
- Emotional Health Inventory;
- Learning Needs Screening;
- Legal Aid appointments;
- Orientation;
- Self-Sufficiency Evaluations with the case manager;
- TABE testing;
- Time spent with the case manager during the home visit;
- Work Keys testing;
- Working with Bureau for Social Services (Multi-Disciplinary Team meetings);
- Working with Local Agencies; and
- WVU CED Assessment Testing

All activities must be reviewed monthly. The case manager must update the case comments with the information on the status of the participant.

1. Documentation of Hours for Attendance in Other Work Activities

Hours of participation must be documented using a Participation Time Sheet, DFA-TS-12. The maximum amount of time a participant may be placed in the Other Work Activities component is 60 days. Placement beyond the 60 day time limit will require Division of Family Assistance (DFA) approval.

2. Appropriate Support Service Payments and Services are available to participants in Other Work Activities

Collateral, Transportation, Vehicle Repair, Vehicle Insurance, and DUI payments will be the only allowable support payments associated with this component.

II. HOURS ENGAGED IN WORK

A. EXCUSED ABSENCES

The State shall follow the policy as outlined in the Final TANF Rule published February 2008. Excused absences may not exceed 16 hours in a month or 80 hours in any 12-month period. Holidays shall include only Federal holidays as prescribed by law. These are limited to New Year's Day, Martin Luther King Jr.'s Birthday, President's Day, Memorial Day, Independence Day, Labor Day, Columbus Day, Veterans Day, Thanksgiving Day, and Christmas Day.

Excused absences shall include medically verified illnesses or doctor appointments and absences due to children's or other family members' illness. Excused absences may not exceed 16 hours in a month or 80 hours in any 12-month period.

For all cases, absences will be tracked for a 12 month period that includes the reporting month plus the preceding 11 months. The absences must be documented in case comments each month. WV PATH also keeps a total of excused absence hours used for each participant to ensure that the allowable hours are not exceeded.

B. FLSA DEEMING

West Virginia opts to use the deeming provision permitted at §261.31 and §261.32 for Work Experience and Community Service Programs. West Virginia operates a SNAP Workfare Program and a mini-SSNAP for TANF recipients. This will allow the participation hours to be calculated by adding the SNAP benefits plus the cash assistance and dividing that number by the Federal or State minimum wage, whichever is higher, to meet the participation requirements for core hours.

SNAP benefits + Net Cash Assistance ÷ Federal or State Minimum Wage (whichever is higher) = number of hours assigned.

When the participant participates for the maximum number of hours allowed by the FLSA, they will be deemed to be meeting the federal participation requirements for core hours and this will be recorded in the case record and recorded in case comments in the WV PATH system. Any additional hours necessary must be assigned and met by completing other countable work activities not covered by FLSA. These deemed hours are captured by a new Data Element in WV PATH. The case manager enters the component of FL in WV PATH in addition to any work component that is governed by the FLSA. If the hours reported in the Core component match the number of hours recorded in the FL component, the participant will be deemed to be meeting the Core participation requirement and these deemed hours will be reported as participation hours.

C. DAILY SUPERVISION

The case manager or other responsible party provides oversight, knows what the participant is supposed to be doing, and is accountable for ensuring that the participant is actually performing these tasks. The contact may be in person, by phone, or electronic where available.

III. WORK-ELIGIBLE INDIVIDUALS

A. DEFINITIONS

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

- A minor parent and not the head-of-household;
- An non-citizen who is ineligible to receive assistance due to his or her immigration status; or
- At state option, when a recipient of SSI benefits is participating in the "Ticket to Work" Program.

The term also excludes:

- A parent providing care for a disabled family member living in the home, provided that the need for such care is supported by medical documentation. A family member is a relative by blood or marriage living in the household with the parent and child. A disability must be documented by a physician and indicate the prognosis and the length of time the disability is expected to last. The exemption must be reviewed, at least quarterly, to ensure that the parent has not become a Work-Eligible Individual.
- Any month in the Fiscal year in which a family with a Work-Eligible Individual whose application for Supplemental Security Income (SSI) or Social

Security Disability Insurance (SSDI) was approved retroactively when this occurs within the allowable time frames.

B. DOCUMENTATION

The State eligibility determination and WV WORKS case management systems, known as WV PATH, collects and uses individual level characteristics, detailed household information including non-financial and financial information collected by field staff for all the individuals living in the household. The non-financial information includes household relationship, reasons for excluding the individual from Assistance Payment and other demographic information.

- Minor parents are evaluated in relation to their marital status and household relationship, as well as worker identification of the head-of-household.
- Non-citizen data is collected via multiple questions related to citizenship, citizenship status, and/or refugee status.
- SSI parents are identified via worker input and cross matching for data verification with the Social Security Administration which is conducted on a daily basis.

WV PATH assigns a Participation Status Code to each person in the household for each Program of Assistance. This code consists of two letter characters. The Participation Status Code classifies individuals by identifying whether the person must be included or excluded as a benefit recipient and how their income and assets should be counted.

- An individual over age 18 who is an SSI recipient, has a system failure code and is not pulled as a Work-Eligible Individual.
- An individual who is an ineligible non-citizen, has a system failure code for not meeting citizenship eligibility requirements, and is not pulled as a Work-Eligible Individual.
- EA is a Work-Eligible Individual included in the benefit.
- WD is a person who is not eligible to receive WV WORKS but whose income and assets are considered when determining the eligibility for the potentially eligible members of the assistance group. These are non-recipient Work-Eligible Individuals.
- XA is a non-recipient, but not a parent and are not a Work-Eligible Individual.
- TW - The WV WORKS Case Manager enrolls a participant who is caring for a disabled family member in this component so they are not pulled as a Work-Eligible Individual.

Following full data input, the case manager can view the case and individual information, share it with the customer and print summary data for customer signature prior to the confirmation of the benefits.

Data accuracy is enforced by multiple system edits and documented programming which collects and reports countable work hours by individual work activity as established by DFA policy. This ensures only countable work hours are reported.

Based on data input at the worker level, WV PATH maps the information and compares it to the standards established by DFA policy. Work Participation Status is then determined automatically by WV PATH.

A TANF universe is created on the third week of the month for the previous month; this universe includes all the families (two parent, single parent, and child only) that received TANF for the previous month and the families that ended their TANF eligibility for the previous month.

During this time the stratum is identified and all the data elements are collected per the documentation provided by ACF for reporting data report sections 1 through 4. The universe is then saved in a DB2 database where it goes through a series of checks to ensure the accuracy of the data. These checks include SQL queries and summary reports to validate the data inconsistency checks.

Ten days prior to the reporting due date, a batch process is scheduled to collect the updated participation hours for the previous three months. Consistency checks are performed and once the data is deemed accurate, the TANF sample report is created per the WV sampling plan was approved by ACF. The report is then transmitted to ACF through NDM process.

All data programs related to the ACF Data Report are reviewed on a yearly basis in accordance with the Single Agency Audit.

The program functionality, coding, and mapping procedures for all of the 15 data elements outlined below have been thoroughly and successfully tested for quality and accuracy:

- Reporting month – This field is set monthly by the reporting batch process. The batch process has an input of the month and year of the report that is to be run. The month and year input is reviewed and verified by the responsible analyst.
- Stratum – This information is controlled through the reporting process. Functional edits built into the reporting programs gather demographic information that has been obtained by field workers and automatically processes this information outputting the appropriate stratum codes per ACF guidelines. There are several validations that exist within the program that ensure that the correct information is being included and processed.

- Case Number – This field is automatically assigned when a field worker enters a new case through the intake process. The reporting logic extracts this identifying number from the WV PATH database and maps the field to appropriate field in the ACF data report.
- Disposition – This field is automatically generated through a reporting process that gathers information from the WV PATH database. With this information the reporting programs go through a series of validations to ensure that correct information has been captures and will then determine the appropriate disposition code.
- Type of Family for Work Participation
 - This field is generated through reporting program logic. The reporting program gathers the required demographic information from the WV PATH database and filters the information through processing that determines the family type.
- Amount of SNAP Assistance – This field is pulled directly from the WV PATH database and is mapped directly to the appropriate field in TANF data report.
- Receives subsidized child care - This field is generated through reporting programs functionality that retrieves the required information via the Child Welfare System interface. After the reporting program retrieves this information, it is processed through a series of validations and program logic that will automatically set the field to the necessary value in the TANF data report.
- Amount of TANF Assistance – This field is pulled directly from the WV PATH database and is mapped directly to the appropriate field in TANF data report.
- Family Affiliation Code – This field is generated though a reporting process that gather information from the WV PATH database. Reporting program functionality gathers the necessary demographic information (household relationships, ages, etc) and processes this information through a series of validations that ensure that the correct information has been collected. The program logic will automatically produce the appropriate value for the field.
- Non-Custodial Parent Indicator – This field is generated through reporting process that gathers the necessary demographic information (household relationships, ages, etc) information from the WV PATH database. This information is processed through reporting program logic and the appropriate value is set based on the demographic information.

- Date of Birth (Adult) – This information for this field is captured by case managers and is pulled directly from the WV PATH database and mapped directly to the appropriate field in the TANF data report.
- Relationship to Head of Household – This information is captured by case managers and pulled directly from the WV PATH database and mapped directly to the appropriate field in TANF date report.
- Parent with Minor Child – This field is generated by reporting program functionality that gathers and processes the appropriate demographic information. The information is processed through program logic that determines the correct code for the TANF data report based on the guidelines established by ACF.
- Work-Eligible Individual Indicators – Detailed household information including non-financial and financial information for all the individuals living in the household are collected by case managers.

The non-financial information includes household relationships, reasons for excluding the individual from Assistance Payments and other demographic information.

With the information captured by case managers, the reporting sets the appropriate codes for ACF reporting of Work-Eligible Individual Indicator based on the guidelines established by ACF.

- Date of Birth (Child) – The information for this field is captured by case managers and is pulled directly from the WV PATH database and mapped directly to the appropriate field in the TANF data report.

IV. INTERNAL CONTROLS

West Virginia has established and maintains effective internal controls that monitor cases to assure that work verification procedures are properly followed. These controls are part of the curriculum offered by the Bureau for Family Assistance (BFA), Division of Professional Development. The local offices are instructed to follow the West Virginia policy with regard to assignment of clients in appropriate activities. A BFA business unit monitors the field staff's data collection activity for accuracy. Case reviews are conducted by the Division of Planning and Quality Improvement (DPQI). Supervisors review a minimum of ten WV WORKS cases on a monthly basis, at least three of those reviews must include all case management activities. The WV PATH system performs ongoing audits and reviews of data entered into the system, with a series of task reminders are generated to the worker and supervisor regarding case problems. The data reporting process uses a mapping procedure approved by the State's TANF policy unit to report the hours for appropriate data items. The mapping procedure ensures that the appropriate work participation data is transferred from the data system to the appropriate matching data element for ACF. This procedure has been successfully tested for quality and accuracy.

Each district's WV WORKS supervisors complete a minimum of ten WV WORKS case reviews on a monthly basis, at least three of those reviews must include all case management activities.

The supervisory review process includes eligibility, case management, and work activity components.

Specifically for the work activity component, the reviewer is to note the following items:

- Participant is enrolled timely in WV PATH in the appropriate countable activity;
- The activity was end-dated in WV PATH once it was completed;
- The activity assignment meets the statutory definition of the activity;
- The hours required of the participant or family meet the federal participation rate requirement;
- FLSA regulated activities are within the FLSA guidelines;
- When the participant chooses Community Service as their work activity, it meets the current guidelines of Community Service;
- Participants assigned to job search / job readiness are not enrolled in this activity for more than six weeks during the federal fiscal year and no more than four consecutive weeks or additional weeks when declared a needy state;
- Time sheets have been properly completed by the participant and his supervisor;
- Hours worked were correctly calculated for the participation rate;
- Credit was correctly given for excused absences and holidays;
- Hours entered in WV PATH by the WV WORKS Case Manager correspond to the time sheet;
- Required documentation was completed; and
- Sanctions were applied for not meeting the work requirement without good cause.

The Division of Planning and Quality Improvement, Family Assistance Monitoring Unit is a Division of BFA which also operates separately of the management and personnel responsible for determining participant eligibility and participation. This office also completes WV WORKS Program Reviews which include all of the elements covered during Supervisory and Peer Reviews. Each district has a program review completed annually. The purpose if these Program Reviews are:

- To review cases to detect payment errors and instances of noncompliance with State Policy and Laws; and
- To provide constructive comments to correct those errors and to enhance/revise systems to provide better tracking and monitoring. For TANF cases, the review process follows procedures adopted by the State. Cases selected for review are

evenly distributed throughout the State utilizing a random sample method. A TANF Payment Accuracy Review is prepared to share improvements and deficiencies which need addressed with a corrective action plan.

Additional items that will be reviewed include such items as the medical status of the person who is being cared for by someone exempt due to the illness of a family member. The status will be verified on a regular basis by medical documentation provided though a report regarding the condition and prognosis of the person receiving in-home care.

The Bureau is currently operating a TANF Dashboard. The Dashboard offers a summary of each Case Mangers' tasks, reminders, actions needed, and statistics for his caseload. The case manager can go directly to the appropriate activity from the Dashboard to take any needed action on his cases. This tool enables staff to ensure timely appropriate action is taken and provide current TANF work participation rate estimates by caseload assignment. Bureau Managers, Supervisors, and Case Managers can view current or historical reports and spreadsheets reflecting current caseload and work participation details.

DFA staff have developed and scheduled routine monthly desk audits based on samples provided by Management Information System reports. The audits range from reviewing TANF recipients receiving assistance who are not given a timely work assignment to reviewing cases with assigned components not having sufficient work hours recorded to meet the work participation rates. Findings and exceptions are reported to supervisors and case managers along with instructions on what action needs to be taken. Case managers report back to DFA staff actions taken in the cases audited.

Internal controls to control for data errors, including transcription and coding errors, data omissions, computational errors, compilation errors and the controls used to isolate electronic systems and programming errors and the steps to ensure that all work participation report items are internally consistent are completed through WV PATH. Automated programming edits are performed with each sample prior to submission to ACF. Identified errors for data inconsistencies are referred to the BFA, Office of Planning and Quality Improvement, Family Assistance Monitoring Unit where they are individually reviewed and corrected prior to submission.

V. VERIFICATION OF OTHER DATA USED IN CALCULATING THE WORK PARTICIPATION RATES

Under the "complete and accurate" standard for data reporting, West Virginia will use professional development, quality assurance, monitoring, supervisor reviews and the WV PATH data system to validate all data submitted in its TANF Data Report.

A. WORK PARTICIPATION STATUS

Of the three suggested methods of the acceptable ways to calculate the average hours per month for each month, WV has chosen to use actual monthly participation hours as reported on the DFA-TS-12 or other acceptable time sheet. For paid work components, WV PATH will add actual monthly participation hours to the monthly excused absence hours and monthly holiday hours and then divide the result by 4.33. That result will be rounded to obtain the weekly average for

TANF reporting purposes. For non-paid work activities, WV PATH will divide monthly completed hours by 4.33, excused absence hours and holiday hours by 4, and then round the number for each entry. These items will not be added together but will be reported as individual items for TANF reporting purposes. This process is completed for each component separately.

The State will verify through documentation in the case record all hours of participation that it reports. Pay stubs will be used for employment hours, since the employer has a great incentive to ensure accuracy and it minimizes the reporting burden on the participant and the employer. Although placements in OJT and community service positions will be supervised daily and verification of participation recorded on a daily basis, employers or placement agencies will be required to submit only one timesheet each month, in order to minimize the request for documentation for the employer and discourage placements due to an exorbitant amount of time necessary to document activities. Because the State is using the FLSA deeming standard to determine the number of participation hours for Work Experience and Community Service placements, the number of core participation hours will be deemed to have been met when the participant completes the assigned hours. The actual hours worked will be entered into the WV PATH system with a detailed explanation of the hours required and why the completed hours are deemed to be meeting the work requirement. These comments will also address any excused or unexcused absences and the calculations used in determining the number of hours recorded.

In the process of determining TANF eligibility the WV PATH data system collects all the required information at the individual and case levels. Once eligibility is established, the family is reported to ACF based on the characteristics required by the ACF TANF Data Report sections I thru IV.

Within WV PATH, data accuracy is enforced by multiple system edits and documented programming which collects and reports countable work hours by individual work activity as established by DFA policy. This ensures only countable work hours are reported.

B. SPECIFIC ISSUES REGARDING PARTICIPATION GUIDELINES

1. Along with professional development and quality control reviews on several levels, for reporting purposes, WV PATH edits will be enforced to prevent the disregard of the single custodial parent for greater than 12 months per lifetime.
2. Along with professional development and quality control reviews on several levels, for reporting purposes, WV PATH edits will be enforced to prevent a family from being 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.
3. Along with professional development and quality control reviews on several levels, for reporting purposes, WV PATH edits are in place for ensuring a family deemed engaged in work based on 20 hours of participation in

countable work activities meets the requirements of a single custodial parent or caretaker relative with a child under age six.

4. For changes that take place in the reporting month, but are not discovered until subsequent months, the submission data should be revised within the allowable time frames.

VI. SUBMITTAL PROCEDURES

West Virginia will submit this Revised Work Verification Plan to the Department of Health and Human Services (HHS).

West Virginia will submit the revised Work Verification Plan to the Office of Family Assistance (OFA), with a copy to the appropriate Regional Office of the Administration for Children and Families. The original will be sent to:

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

West Virginia may also submit the Work Verification Plan electronically (as an e-mail attachment) and mail the original signature separately.

CERTIFICATION

This is to certify that West Virginia's TANF Work Verification Plan dated October 2, 2023 includes all the information required by the regulations at 45 CFR 261.62(b) and accurately reflects the provisions under which West Virginia will be operating effective November 1, 2023.

Signature:  Date: 3-25-24
Janie M. Cole, Commissioner
Bureau for Family Assistance

APPENDIX A

Illustrative Offerings of Vocational Associate and Certificate Program	
Associate in Science	Vocational Certificate
Accounting	Airframe and Power Mechanics
Architectural Design	Auto Collision Repair
Automotive Service Management	Automotive Machine Shop
Aviation Operations	Automotive Service Technician
Building Construction Technology	Barbering
Business Administration	Brick Masonry
Business Marketing Management	Carpentry
Civil Engineering Technology	Child Care Center Operator
Computer Engineering	Corrections Officer
Criminal Justice Technology	Cosmetology
Culinary Management	Credit Union Service Marketing
Dental Hygiene	Dental Assisting
Drafting and Design	Electricity
Early Childhood Management	Facials Specialty
Electronics Technology	Heating and Air Conditioning
Fire Science Technology	Massage Therapy
Graphic Design Technology	Medical Secretary
Interior Design	Nails Specialty
Legal Assisting	Network Support Services
Medical Laboratory Technician	Office Systems Specialist
Nursing, Registered Nurse (RN)	Paramedic
Radiography	Plumbing
Respiratory Care	Practical Nursing
	Teller Training
	Travel Agency Operations
	Webmaster and Web Development

