

 Missouri Department of
SOCIAL SERVICES
Your Potential. Our Support.

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April 10, 2017

Gary Allen, Regional TANF Program Manager
Administration for Children and Families
601 E 12th Street, Ste 349
Kansas City, MO 64106

Dear Mr. Allen,

Enclosed you will find Missouri's Work Verification Plan Outline of Changes and the updated Work Verification Plan. As requested, the chart reflects the page number from the current plan, the page number from the previous plan and the reason for the change.

If you have questions please contact Jeriane Jaegers (Jeriane.Jaegers@dss.mo.gov) or JaCinda Rainey (Jacinda.L.Rainey@dss.mo.gov).

Sincerely,



Patrick Luebbering
Family Support Division Acting Director

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Missouri's TANF Work Verification Plan

Effective August 28, 2015

Definitions

Alternative Work Experience/Community Work Experience (AWEP/CWEP):

- Missouri's work experience program.

Departmental Client Number (DCN):

- Number used to identify TA recipients and the TANF case he or she is associated with.

Department of Social Services (DSS):

- Serves as the TANF agency.

Family Support Division (FSD):

- Housed under the Department of Social Services; responsible for the Temporary Assistance program.

Family Assistance Maintenance Information System (FAMIS):

- Missouri's interactive TANF eligibility determination system.

Missouri Work Assistance Program (MWA):

- Missouri's employment and training portion of the Temporary Assistance program administered by the Family Support Division.
- The MWA is contracted.

MWA Case Management System:

- A consolidated computer web-based system administered by the Family Support Division (FSD) and used by MWA contractors to record and track customer employment and training services.
- Provides record-keeping for the work requirements and activities of the TANF population. TANF cases are referred electronically from FAMIS to the MWA case management system. When the referral reaches MWA, the MWA case management system becomes a comprehensive case management data system for TA recipients, recording and tracking the TA recipient's progress, activity participation, actual

participation hours, case history, Individual Employment Plan (IEP), assessments, work histories, supportive service payments, and all other aspects of case management.

Temporary Assistance (TA):

- Missouri's Temporary Assistance for Needy Families (TANF) program.

Temporary Assistance (TA) participants:

- Individuals who has applied for, or is receiving, or has been denied TA benefits or services administered by the Family Support Division.

Temporary Assistance (TA) recipients:

- Individuals who are receiving TANF benefits in Missouri. For the purpose of this plan, any reference to TA recipients in work activities includes only individuals who are work eligible.

Vocational Rehabilitation:

- Housed under the Department of Elementary and Secondary Education, a partner agency to MWA and:
 - Provides specialized services to individuals with disabilities to help them achieve employment and independence by providing individualized counseling, training, and other services to help individuals achieve gainful employment or independent living.
 - Is supported primarily with federal funds. (The Division of Vocational Rehabilitation is housed in the Department of Elementary and Secondary Education but is not considered elementary or secondary school.)

I. Countable Work Activities

Unsubsidized Employment

Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity.)

Missouri includes in this definition:

- Assessments performed as part of a paid activity to determine if the TA recipient is able to obtain a specific employment opportunity, including employer-required tests such as typing, physical, psychological, aptitude, personality, and drug tests;
- Employment in which the wages are paid solely by the employer (no subsidies);
- Employment by temporary employment agencies that function as the employer and therefore, pay the Temporary Assistance (TA) recipient directly while he/she works at various sites;
- Paid clinicals, paid internships, and paid apprenticeships;
- Substance abuse and mental health treatment when the employer pays for these hours;
- Employer compensation in lieu of wages; and
- Self-employment.

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

For assessments performed as part of a paid activity to determine if the TA recipient is able to obtain a specific employment opportunity, an hour of attendance is equal to an hour being assessed. Attendance hours for the assessment process will not include activities that require self-attestation.

For regular unsubsidized employment, employment by a temporary agency, compensation in lieu of wages, paid clinicals, paid internships, paid apprenticeship; substance abuse and mental health treatment that has a set number of hours, a countable hour is equal to an hour of attendance at the worksite performing work or treatment when the employer pays the full wage or when in paid leave or paid holiday status.

For self-employment and compensation in lieu of wages where there are no set hours, Missouri uses the Federal minimum wage calculation to determine countable hours. For compensation in lieu of wages, the individual providing the compensation is required to provide written or verbal verification to the MWA case manager indicating the agreement. For verbal documentation, the case manager will complete a form with the TA recipient's name, Departmental Client Number (DCN), name of individual providing compensation, amount of compensation, agreed terms of repayment, address, and telephone number.

Examples:

Compensation in Lieu of Wages with Set Hours

Dave paid the first month rent and deposit for Tom, totaling \$725.00. In return, Tom will work for Dave for the equivalent of \$7.25 an hour for 20 hours a week for the next 5 weeks. The weekly participation hours = 20.

Self-Employment

Mary is self-employed and receives \$145 a week for babysitting.

$\$145 \text{ divided by } \$7.25 = 20 \text{ hours of weekly participation}$

Compensation in Lieu of Wages with No Set Hours (To be treated as self-employment)

Jo provides handyman services at his apartment complex in exchange for his rent. He has no set hours and takes calls and makes repairs as needed. His apartment normally rents for \$650 per month.

The calculation is: $\$650 \text{ divided by } \$7.25 \text{ divided by the number of weeks in the month}$ (*used for Federal Work Participation Rate reporting)

4 week month: $\$650 \text{ divided by } \$7.25 \text{ divided by } 4 = 22 \text{ hours of weekly participation}$

5 week month: $\$650 \text{ divided by } \$7.25 \text{ divided by } 5 = 18 \text{ hours of weekly participation}$

John received a truck valued at \$1,700 (Per NADA blue book) from Bill. In return, John will work for Bill for the next 9 weeks.

$\$1700 \text{ divided by } 9 \text{ weeks divided by } \$7.25 = 26 \text{ hours of participation weekly}$

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.

For assessments performed as part of a paid activity, regular unsubsidized employment, employment by a temporary agency, paid clinicals, paid internships, and paid apprenticeships; the actual hours are verified through documentation of attendance from the employer, either by examining wage stubs, attendance logs, written documentation from the employer, or by verbal verification from the employer. In the event verbal verification is obtained, the case manager will complete a form with the TA recipient's name and Departmental Client Number (DCN) and employer's name, address, hours of work and wages based on the information received in the verbal contact with the employer. The documentation is recorded; placed in the TA recipient's file; and tracked in the MWA case management system by the case manager, supervisor, office personnel, or fiscal staff.

For substance abuse and mental health treatment paid by the employer, the employer is responsible for the verification of hours. These hours will be included in the regular employment pay which is documented in the same manner as the previous paragraph.

For compensation in lieu of wages with set hours, the individual providing the compensation is required to provide written or verbal verification to the MWA case manager indicating the agreement. For verbal documentation, the case manager will complete a form with the TA recipient's name, Departmental Client Number (DCN), name of individual providing compensation, amount of compensation, agreed terms of repayment, address and telephone number. The hours can only be projected based on the actual agreement, never to exceed six months. The documentation is recorded; placed in the TA recipient's file; and tracked in the MWA case management system by the case manager, supervisor, office personnel, or fiscal staff.

For self-employment, describe how the State counts and verifies the hours of participation. A State may not count more hours toward the participation rate for a self-employed individual than the individual's self-employment income (gross income less business expenses) divided by the Federal minimum wage. The State may also describe an alternative methodology to count and verify hours a client is engaged in self-employment.

For self-employment, Missouri uses the Federal minimum wage calculation. Written documentation of gross income less business expenses is required no less than every six months, or whenever the income or circumstances undergo a major change. Examples of documentation include: bank deposit slips, tax forms, and receipts from customers. The total hours are reduced to weekly hours by dividing the total monthly wages by applicable Federal minimum wage divided by the number of Federal weeks in the month. This calculation provides a weekly amount of actual hours for the TA recipient. The documentation is recorded; placed in the TA recipient's file; and tracked in the MWA System by the case manager, supervisor, office personnel, or fiscal staff.

For compensation in lieu of wages with no set hours, Missouri uses the Federal minimum wage calculation. The total hours are converted to weekly hours by dividing the total monthly wages by the applicable Federal minimum wage divided by the number of Federal weeks in the month. This calculation provides a weekly amount of actual hours for the TA recipient. The individual providing the compensation is required to provide written or verbal verification of the agreement. For verbal documentation, the case manager will complete a form with the TA recipient's name and Departmental Client Number (DCN) and individual providing compensation, amount of compensation, agreed terms of repayment, address and telephone number. The documentation is recorded; placed in the TA recipient's file; and tracked in the MWA System by the case manager, supervisor, office personnel, or fiscal staff.

If the State intends to project forward hours of participation based on current, documented, actual hours, explain how it will make this projection.

Projection of hours is not allowed for assessment.

The documentation used to verify the actual hours for regular unsubsidized employment will allow projection of hours up to six months. Projection of hours are only allowed after the receipt of at least one (1) pay stub, attendance logs, signed written verification or verbal verification from the employer. All documentation used for projection of hours must be indicative of anticipated on-going hours. If the case manager becomes aware of a change in circumstances, the projected weekly hours are modified as necessary.

The documentation used to verify the actual hours for temporary agency employees will allow projection until the end of the assignment at the particular worksite, never to exceed six months. Projection of hours are only allowed after the receipt of at least one (1) pay stub, attendance logs, signed written verification or verbal verification from the employer. All documentation of projected hours must be indicative of anticipated ongoing hours. If the case manager becomes aware of a change in circumstances, the projected weekly hours are modified as necessary.

The documentation used to verify the actual hours for paid clinicals, paid internships, and paid apprenticeships will allow projection until the end of the assignment, never to exceed six months. Projection of hours are only allowed after the receipt of at least one (1) pay stub, attendance logs, signed written verification or verbal verification from the employer. All documentation of projected hours must be indicative of anticipated on-going hours. If the case manager becomes aware of a change in circumstances, the projected weekly hours are modified as necessary.

Projection of hours is not allowed for compensation in lieu of wages.

Projection of hours is not allowed for self-employment.

Subsidized private sector employment; subsidized public sector employment

Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definitions of the activity)

Missouri includes in this definition:

- Assessments performed as part of a paid activity to determine if the Temporary Assistance (TA) recipient is able to obtain a specific employment opportunity including employer-required tests such as typing, physical, psychological, aptitude, personality, and drug tests;
- Paid employment in the public or private sector wherein the salary is paid directly to the TA recipient by the contractor providing the employment and training services, and is fully-funded by TANF;
- Supportive services including mental health, substance abuse treatment, job search, and training if the TA recipient is paid for these hours;
- Paid Federal work study; and
- Paid supported work for individuals with disabilities in an integrated setting.

(Missouri does not employ wage supplementation or fees to a temporary agency for employment of TA recipients as subsidized employment models.)

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

For assessments as part of a paid activity to determine if the TA recipient is able to obtain a specific employment opportunity, an hour of attendance is equal to an hour of being assessed. Attendance hours for the assessment process will not include activities that require self-attestation.

For subsidized private or public sector employment which is fully-funded by TANF; Federal work study; and paid supported work for individuals with disabilities in an integrated setting, a countable hour is equal to an hour of paid attendance at the worksite, performing work, or when in paid leave or paid holiday status.

For substance abuse and mental health treatment paid by the employer, the employer is responsible for the verification of hours. These hours will be included in the regular employment pay which is documented in the same manner as the previous paragraph.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.

For assessments as part of a paid activity and paid employment in the public or private sector wherein the salary is fully-funded by TANF and is paid directly to the TA recipient, the contractor providing the employment, and training services is the employer. Therefore, the hours are determined and set by the case manager or other staff persons. The hours are verified through attendance logs, other daily attendance documents, or verbal verification. The attendance documents are signed by the employer, payroll representative, or other supervisory personnel at the worksite. For verbal documentation, the case manager will complete a form with the TA recipient's name and Departmental Client Number (DCN) and employer's name, address, hours of work, and wages based on the information received in the telephone contact with the employer. The documentation is recorded; placed in the TA recipient's file; and tracked in the MWA System by the case manager, supervisor, office personnel, or fiscal staff.

For substance abuse and mental health treatment paid by the employer, the employer is responsible for the verification of hours. These hours will be included in the regular employment pay which is documented in the same manner as the previous paragraph.

For paid Federal work study, the educational institution and TA recipient "contract" for hours of work for each school term. The countable hours are determined through documentation of attendance by the instructor/supervisor, wage stubs, or verbal verification. For verbal documentation, the case manager will complete a form with the TA recipient's name and Departmental Client Number (DCN) and employer's name, address, hours of work, and wages based on the information received in the telephone contact with the employer. The attendance logs are signed by the employer, instructor, payroll representative, or other supervisory personnel at the worksite. The documentation is recorded; placed in the TA recipient's file; and tracked in the MWA System by the case manager, supervisor, office personnel, or fiscal staff.

For paid supported work for individuals with disabilities in an integrated setting; case management in many instances will be provided by the Division of Vocational Rehabilitation. The countable hours are documented through attendance logs, other hard-copy evidence, or verbal verification obtained by the Vocational Rehabilitation counselor from the supervisor at the work site. The attendance logs are signed by the employer, payroll representative, or other supervisory personnel at the worksite. For verbal documentation, the case manager will complete a form with the TA recipient's name and Departmental Client Number (DCN) and employer's name, address, hours of work, and wages based on the information received in the telephone contact with Vocational Rehabilitation. The case manager will work in collaboration with the Vocational Rehabilitation counselor to account for and verify countable hours of participation. The documentation is recorded; placed in the TA recipient's file; and tracked in the MWA System by the case manager, supervisor, office personnel, or fiscal staff.

If the State intends to project forward hours of participation based on current, documented, actual hours, explain how it will make this projection.

Projection of hours is not allowed for assessment.

The documentation used to verify the actual hours for subsidized private and subsidized public sector employment will allow projection of hours up to six months. Projection of hours are only allowed after the receipt of at least one (1) pay stub, attendance logs, signed written verification or verbal verification from the employer. All documentation used for projection of hours must be indicative of anticipated ongoing hours. If the case manager becomes aware of a change in circumstances, the projected weekly hours are modified as necessary.

Work experience (including work associated with the refurbishing of publicly assisted housing) if sufficient private sector employment is not available.

Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity).

Missouri includes in this definition:

- Assessments to determine if the Temporary Assistance (TA) recipient is able to pursue or obtain a specific employment opportunity including:
 - Assessments performed by case managers to determine past employment, medical, drug history, etc. that would affect the ability to obtain the position;
 - Vocational Rehabilitation assessment to determine the ability to obtain the position; and
 - Employer required tests such as typing, physical, psychological, aptitude, personality, and drug tests;
- Volunteer employment in a private sector setting, called Alternative Work Experience (AWEP); and
- Volunteer employment in a public sector setting, called Community Work Experience (CWEP).

Alternative Work Experience (AWEP) and Community Work Experience (CWEP) is unpaid, volunteer work designed to improve the employability of the TA recipient not otherwise able to obtain sufficient or suitable employment. It provides work experience and training to assist the TA recipient to move promptly into regular public or private employment.

AWEP includes work at employers (other than those that provide social services) such as accounting firms, garages, beauty and barbershops, and department stores. CWEP is limited to employers or projects that serve a useful public purpose in fields such as health (including clinicals), social service, environmental protection, education, urban and rural development, recreation, public facilities, public safety, and child care.

AWEP/CWEP work sites:

- Must meet appropriate health and safety standards;
- Must employ at least one other employee;
- Must provide daily supervision as any with any other employee; and
- Must sign the "Worksite Agreement" that provides information on the employer responsibilities including monitoring of attendance and performance.

AWEP/CWEP participants:

- Cannot fill existing unfilled position vacancies;
- Cannot receive a salary or any work or training expense provided under any provision of law;
- Should be placed in AWEP/CWEP only if they cannot be placed in paid jobs;
- Are not considered federal employees if they perform work in the public interest for a federal office or agency;
- Can never displace current employees;
- Must be assessed by the case manager for basic skills needed;
- Will be replaced by other TA recipients when the stated skills are gained; and
- Must sign the "Participant Agreement" which outlines the skills to be mastered and proposed time frame.

No AWEP/CWEP participant shall be assigned to a position when:

- Any other TA recipient is on layoff from the same or any substantially equivalent job;
- The employer has terminated the employment of any regular employee, reduced the hours of an employee, or otherwise caused an involuntary reduction of its workforce in order to fill the vacancy with a AWEP/CWEP participant; or
- A strike, lockout, or other bona fide labor dispute creates the employment opportunity.

Any TA recipient or employee who believes that he/she has been adversely affected by the placement of an AWE/CWE participant shall be given the opportunity to grieve it through the following process:

- The TA recipient or employee, or an organization that is authorized to represent the TA recipient or employee, shall first attempt to remedy the alleged violation through a meeting with the employer within 30 days of the request of the meeting.
- If the complaint is not resolved, the TA recipient or employee may appeal to the Labor and Industrial Relations Commission. The Commission shall conduct a hearing and shall render a decision within 45 days of the hearing.
- If the TA recipient or employee is aggrieved by the decision of the commission, he/she may file a petition for review in the circuit court in which he/she resides within 30 days of the date of the decision.

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

For assessment to determine if the TA recipient is able to obtain a specific worksite opportunity, an hour of attendance is equal to an hour of being assessed. Prior to being assessed, the case manager must indicate the worksite opportunity the TA recipient is going to pursue. Attendance hours for the assessment process will not include activities that would require self-attestation.

For AWE/CWE, a countable hour is equal to an hour of attendance at the worksite. To determine countable hours allowed under this activity, the value of the monthly TANF cash grant is added to the household's monthly food stamp allotment* less child support retained by the state and divided by the state minimum wage or Federal minimum wage, whichever is higher.

AWE/CWE positions are subject to FLSA. Because there are hundreds of exceptions to FLSA that are not easily identifiable for a certain employer, the employer is required to verify if they are subject to FLSA by indicating this (in a check box) on the "Worksite Agreement". If the employer states they are not subject to FLSA, the TA recipient will not be placed at that worksite.

*Note: Missouri has received approval to operate a simplified Food Stamp program, and is therefore permitted to combine the TANF grant and the Food Stamp allotment to arrive at the maximum monthly hours for each TA recipient.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation

For assessment to determine if the TA recipient is able to pursue or obtain a specific employment opportunity, the individual providing the assessment is required to provide signed written verification or verbal verification indicating type of assessment(s), date(s), time(s), and hour(s) spent. For verbal documentation, the case manager will complete a form with the TA recipient's name, Departmental Client Number (DCN), type of assessment, date(s), time(s) and hour(s), and name/title of individual providing assessment. The documentation is recorded; placed in the TA recipient's file; and tracked in the MWA System by the case manager, supervisor, office personnel, or fiscal staff.

For AWEF/CWEP, actual hours are verified through attendance logs that are signed by the employer, payroll representative, or other supervisory representative at the worksite. The documentation is recorded; placed in the TA recipient's file; and tracked in the MWA System by the case manager, supervisor, office personnel, or fiscal staff.

This activity allows for Holidays and Excused Absences in accordance with the "Hours Engaged in a Work Activity" section of this plan.

Describe the methods of daily supervision for each unpaid work activity.

Daily supervision is performed by the worksite supervisor, as with regular paid employment. TA recipients are required to provide attendance sheets, signed by the worksite supervisor, payroll representative, or other supervisory personnel to their case manager no less than every two weeks. These signed attendance sheets verify actual hours of attendance at the worksite. The signed documentation is recorded; placed in the TA recipient's file; and tracked in the MWA System by the case manager, supervisor, office personnel, or fiscal staff.

On-the-Job Training (OJT)

Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity.)

Missouri includes in this definition:

- Assessments as part of a paid activity to determine if the Temporary Assistance (TA) recipient is able to obtain a specific employment opportunity including employer-required tests such typing, physical, psychological, aptitude, personality, and drug tests;

- OJT employment in which a TA recipient is hired by a public or private employer through a contractual agreement wherein the employer provides hands-on training for a specific job at the employer's place of business. The employer is compensated up to 50% of the wages paid to the TA recipient due to the extraordinary costs of training and lower productivity of the individual; and
- Supportive services including mental health, substance abuse treatment, job search, and training as part of the OJT if the TA recipient is paid for these hours.

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

For assessments as part of a paid activity to determine if the TA recipient is able to obtain a specific employment opportunity, an hour of attendance is equal to an hour of being assessed. Attendance hours for the assessment process will not include activities that require self-attestation.

For OJT and paid supportive services including mental health, substance abuse treatment, job search, and training, a countable hour is equal to an hour of attendance at the worksite, performing work, training, treatment, and job search.

This activity allows for Holidays and Excused Absences in accordance with the "Hours Engaged in a Work Activity" section of this plan.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.

For assessments as part of a paid activity and OJT, actual hours are verified through documentation of attendance from the employer, either by examining wage stubs, attendance logs, written documentation from the employer, or by verbal verification from the employer. In the event verbal verification is obtained, the case manager will complete a form with the TA recipient's name and Departmental Client Number (DCN) and employer's name, address, hours of work and wages based on the information received in the telephone contact with the employer. The documentation is recorded; placed in the TA recipient's file; and tracked in the MVA System by the case manager, supervisor, office personnel, or fiscal staff.

For paid supportive services including mental health, substance abuse treatment, job search, and paid training, the employer is responsible for the verification of hours. These hours will be included in the regular employment pay which is documented in the same manner as the previous paragraph.

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

OJT is distinguished from other subsidized employment by the inclusion of a training plan. The training plan is a formal and written program of the structured job training that will provide a TA recipient with an orderly combination of instruction in work maturity skills, general employment competencies, and occupationally specific skills that will enable the TA recipient to work toward self-sufficiency.

If the State intends to project forward hours of participation based on current, documented, actual hours, explain how it will make this projection.

Projection of hours is not allowed for assessment.

The documentation used to verify the actual hours for OJT will allow projection of hours up to six months. Projection of hours are only allowed after the receipt of at least one (1) pay stub, attendance logs, signed written verification or verbal verification from the employer. All documentation of projected hours must be indicative of anticipated ongoing hours. If the case manager becomes aware of a change in circumstances, the projected weekly hours are modified as necessary.

Job Search and Job Readiness Assistance

Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity.)

Missouri defines job search as that activity in which a TA recipient looks for suitable jobs by making contact with potential employers. The TA recipient must present himself/herself to a prospective employer as available for work. The prospective employer must ordinarily employ persons in areas of work that meet suitable work requirements for which the TA recipient is reasonably qualified by means of experience, training, or ability.

These activities include:

- Completing in-person applications;
- Responding to classified advertisements;
- Completing on-line applications either at home or at the employer's worksite;
- Attending, completing employment applications, and speaking with potential employers at job fairs;

- Online research through jobs.mo.gov and other state and national data bases; jobs.mo.gov hours are sent electronically to FSD and recorded in the MWA system
- Travel time between multiple interviews or job search activities; and
- A minimum of bi-weekly, post-job search assessment with the TA recipient, and guidance by the case manager which includes:
 - Using the information obtained from the TA recipient and the job log to assess for deficiencies or strengths apparent in the most recent search;
 - Review job search log for accuracy;
 - Reviewing each job search log for completeness. If the job search log is not complete, the case manager will work with the TA recipient to complete. If it is not possible for the job seeker and case manager to complete the log due to lack of information, the hours do not count toward the participation;
 - Making modifications to the Individual Employment Plan (IEP) based on results of the most recent search;
 - Suggesting strategies and encouraging the TA recipient when he/she is only marginally successful, or unsuccessful in the job search; and
 - Stopping the job searching when it becomes evident that the TA recipient is not prepared to obtain or maintain employment.

Missouri defines job readiness as preparing a TA recipient to seek, obtain, and maintain employment through various activities including:

- Conducting assessments to identify:
 - Training or type of employment that would best fit his/her personality;
 - Barriers and strengths to employment;
 - Job survival skills;
 - Job attitude;
 - Career path;
 - Career interests; and
 - Employment history.
- Allowing TA recipient to attend workshops and classes in subjects such as resume writing, networking, career exploration, and soft/life skills.
- Allowing TA recipients to attend one or more treatment programs designed to remove an identified employment barrier including:
 - Day Treatment,
 - Counseling,
 - Group Education,
 - Group Counseling,

- Physical Rehabilitation,
- Alcoholics Anonymous (AA),
- Narcotics Anonymous (NA),
- Substance Abuse Traffic Offenders Program (SATOP),
- Mental Health Case Management, and
- Residential Treatment.

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

Job Search:

For assessment, an hour of attendance is equal to an hour of being assessed. Attendance hours for the assessment process will not include activities that require self-attestation.

For job search, countable hours are determined by actual hours spent in that search. The TA recipient must provide documentation of actual hours of structured job search to the case manager (on the daily job log) no less than once every two weeks. Online job search conducted on jobs.mo.gov are determined by log in and log out time. Electronic documentation of actual online job search hours is sent electronically to FSD and recorded in the MWA system.

Job Readiness:

For assessment, an hour of attendance is equal to an hour of being assessed. Attendance hours for the assessment process will not include activities that require self-attestation.

For classes and workshops, a countable hour is equal to an hour of attendance.

This activity allows for Holidays and Excused Absences in accordance with the "Hours Engaged in a Work Activity" section of this plan.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation

For assessment under the job search and job readiness activities, the individual providing the assessment is required to provide signed written verification or verbal verification indicating type of assessment, date(s), time(s), and hour(s) spent. For verbal documentation, the case manager will complete a form with the TA recipient's name, Departmental Client Number (DCN), type of assessment, date(s), time(s) and hour(s), and name/title of individual providing assessment. The documentation is

recorded; placed in the TA recipient's file; and tracked in the MWA System by the case manager, supervisor, office personnel, or fiscal staff.

For job search, actual hours of participation are tracked on a daily job log. This log contains the name, address, and contact person for each employer contacted by the TA recipient. The form also includes the job vacancy title, when the contact was made, what type of contact it was (in-person or otherwise), number of hours spent in the activity, and the outcome of the search. The case manager will verify at least one contact on the log and if the verification shows an error in the job search, the case manager must do further research and not count this toward participation. The documentation is recorded; placed in the TA recipient's file; and tracked in the MWA System by the case manager, supervisor, office personnel, or fiscal staff.

Online job search hours from jobs.mo.gov are sent electronically to FSD and recorded in the MWA system.

For attending workshops and classes under the job readiness activity, a countable hour is equal to an hour of attendance. The hours are verified through signed documentation from the instructor or case manager leading the workshop or class. The documentation is recorded; placed in the TA recipient's file; and tracked in the MWA System by the case manager, supervisor, office personnel, or fiscal staff.

For treatment programs, a countable hour is an hour of attendance. The hours are verified through actual weekly attendance hours with the treatment and support facility or qualified provider. This information can be obtained either from the TA recipient and signed by the facility or by the case manager and signed by the facility. If this documentation is not available, due to confidentiality or the sensitive nature of the information, other means such as a verbal statement of actual hours of attendance from the medical or mental health professional provided to the case manager and documented in the data tracking system or paper file by the case manager will suffice with supervisory review. Other means of documentation will be considered on a case-by-case basis. All written documentation will be kept in the TA recipient's file. The medical provider or office staff may sign the attendance forms.

Describe the methods of daily supervision for each unpaid work activity.

For assessment under the job search and job readiness activities, supervision is accomplished by the person providing the assessment.

For job search, the case manager will attempt to have frequent contact with each job seeker. However, due to the potential hardship for TA recipients to obtain childcare and travel to the subcontractor's place of business, and our limited staff resources, below are options for supervision beyond the bi-weekly, post-job search assessment.

These options include:

- Job club combined with job search: Staff will provide daily job clubs, scheduled one week at a time. These may be one-half day in length, with job search to be performed by the TA recipient the remaining half-day. Job club will allow the case manager to sit down face-to-face with a TA recipient, either before or after the day's job search and discover what occurred. A peer-to-peer component may be included also. At the end of one week, if the job search (job club) did not result in employment, another assessment is performed and the TA recipient is moved into another appropriate activity (which may be another week of job search/job club).

This approach is likely to be most successful in urban areas where it is expected that many TA recipients will attend in the same week. In rural areas, this may not be practical due to the wide-ranging populations. Not enough TA recipients may attend any given week to make the job club cost-effective or time-efficient.

- Electronic, telephone, email or other non-in-person contacts.

For attending workshops and classes under the job readiness activity, supervision is accomplished by the instructor or staff person leading the class, workshop or job club, etc. maintaining a log of attendance for TA recipients.

For treatment programs, supervision is performed by the service (treatment) provider and is documented. Case managers maintain contact with the service provider while the TA recipient is in treatment, as appropriate.

If the state intends to count substance abuse treatment, mental health treatment and rehabilitation activities, describe the criteria to determine whether TA recipients are "otherwise employable" and establish the necessity of treatment or therapy.

Missouri will allow treatment activities for substance abuse, mental health and rehabilitation, etc. within the job readiness activity using the following criteria:

- Documentation in the form of a written statement from a licensed medical, mental health, or other social work professional regarding the TA recipient's ability to engage in work or work-related activities.
- Statement should include duration of treatment as appropriate.
- Statement should include hours of participation as appropriate. For example, the statement may indicate that the treatment is full-day, 5 days per week for 2 weeks.

Other means of documentation will be considered on a case-by-case basis. All written documentation will be kept in the TA recipient's file. The medical provider or office staff may sign the attendance forms.

Describe how the State ensures that no more than 120 hours or 180 hours (no more than four consecutive weeks at a time) of job search and job readiness assistance are reported in a fiscal year (or a total of 240 hours or 360 hours in States that meet the definition of a "needy State" for the Contingency Fund).

Missouri's federal reporting is programmed to include edits for job search and job readiness activities that exceed the maximum of 120 hours or 180 hours (depending on the weekly core hour requirement) or 240 or 360 hours if a "needy" state, not to exceed 4 consecutive weeks at a time. If a TA recipient's hours or weeks exceed allowable amounts, these are not reported. Missouri is a "needy" state.

Missouri reports job search and job readiness as one activity. If a person is active in both job search and job readiness at the same time during the reporting month, the information is combined into one activity for the TA recipient.

Community Service Program

Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity.)

In Missouri, the Community Service Program is a structured volunteer activity for TA recipients who lack clear work skills and may not be able to obtain and maintain stable employment.

A TA recipient is placed into the Community Service Program when an assessment determines that he/she is not yet ready for other core activities and may benefit from the skills that can be attained during this structured, volunteer program. Types of assessments within this activity include:

- Assessments performed by case managers to determine past employment, medical, drug history, etc. that would affect the ability to participate in the assignment;
- Reassessment at a minimum of every 90 days to determine the TA recipient's suitability for higher level activities through case contact with the TA recipient and a review of the mandated assessment that is on file.
- Vocational Rehabilitation assessment to determine the ability to participate in the assignment; and
- Employer required tests such as typing, physical, psychological, aptitude, personality, and drug tests.

The Community Service Program creates an employer/employee relationship to improve the employability and basic skills of TA recipients not otherwise able to obtain employment.

Considering that TA recipients may not be able to obtain and maintain stable employment due to the lack of soft work skills, the program includes positions with the intent to improve skills, such as:

- Reporting to work on time
- Calling-in when unable to work
- Following instructions
- Staying on task
- Exhibiting proper hygiene
- Maintaining proper appearance
- Using appropriate language
- Being polite
- Asking for clarification when needed
- Communicating disagreements
- Getting along with peers and supervisors
- Other skills identified as barriers to ongoing employment

The volunteer work is performed on-site and under the supervision of public or non-profit organizations, and may take into account the prior training, experience and skills of the TA recipient.

To be considered as a work site, organizations must apply to the local service providers in the region/area, and complete the "Community Service Worksite Agreement" form. The employer must provide a list of skills to be performed for each "job" opening they have. Employers must indicate the number of hours available for each position and confirm that the position:

- Will not be replacing a paid employee;
- Will not result in a layoff of regular employees; and
- Could not be filled by a full-time paid employee.

Successful Community Service employer applicants are placed on a listing of potential worksites, and each Community Service participant is matched to the worksite that best meets his/her needs, whenever possible. If the employer needs to add additional positions at a later date, they may complete the "Worksite Agreement Addendum".

The MWA case manager needs to reassess the TA recipient at a minimum of every 90 days to determine the TA recipient's suitability for higher level activities. This reassessment must include:

- Case manager contact with the Community Service worksite supervisor to determine if the Community Service participant has been able to complete the soft skills required (such as those described above). For the employer to make this determination, he/she should use the same criteria that would be required for any other employee; and,

- Case manager contact with the TA recipient; and a review of the mandated assessment that is on file.

If, after speaking with all parties the case manager determines the TA recipient should be placed in other activities, then this should be pursued. If the case manager determines the TA recipient needs to engage in further Community Service, thorough case notes should be included in the file with an explanation of the soft skills the TA recipient needs to obtain and how this will be accomplished.

A TA recipient may be placed in a Community Service Program worksite where the employer is a relative; however, the following must be met:

- The case manager must obtain supervisory approval;
- The worksite must meet all conditions of the Community Service Program as with any other employer; and
- There must be case notes entered documenting an explanation of the circumstances leading to using a relative-employer as the worksite.

The TA recipient must complete the "Community Service Participant Agreement" which explains the requirements of the assignment. The TA recipient is taken out of the Community Service Program when he/she is ready to begin other, more appropriate activities.

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

For assessment, an hour of attendance is equal to an hour of being assessed. Attendance hours for the assessment process will not include activities that require self-attestation.

For TA recipients in a Community Service position, a countable hour is equal to an hour of attendance at the worksite. Missouri has received approval to operate a simplified Food Stamp program, and is therefore permitted to combine the TANF grant and the Food Stamp allotment to arrive at the maximum monthly hours for each Community Service participant. To determine countable hours allowed under this activity, the value of the monthly TANF cash grant is added to the household's monthly food stamp allotment less child support retained by the state and divided by the state minimum wage, or Federal minimum wage, whichever is higher. The MWA System calculates the allowable hours and will not allow an entry of participation hours that exceeds the maximum allowed.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation

For assessment to determine if the TA recipient is able to obtain a specific assignment, the individual providing the assessment is required to provide signed written verification or verbal verification indicating type of assessment, date(s), time(s), and hour(s) spent. For verbal documentation, the case manager will complete a form with the TA recipient's name, Departmental Client Number (DCN), type of assessment, date(s), time(s) and hour(s), and name/title of individual providing assessment. The documentation is recorded; placed in the TA recipient's file; and tracked in the MWA System by the case manager, supervisor, office personnel, or fiscal staff.

For Community Service, the worksite supervisor verifies actual attendance at the worksite, using timesheets or other daily logs as documentation. This documentation is provided no less than every two weeks to the case manager who reviews it and records participation hours in the data tracking system. The attendance logs are signed by the employer or payroll representative or other supervisory personnel at the worksite. The documentation is recorded; placed in the TA recipient's file; and tracked in the MWA System by the case manager, supervisor, office personnel, or fiscal staff.

This activity allows for Holidays and Excused Absences in accordance with the "Hours Engaged in a Work Activity" section of this plan.

Describe the methods of daily supervision for each unpaid work activity.

The employer performs the daily supervision of the TA recipient as agreed to in the application process by offering guidance and developing commentary or daily logs, etc. Guidance and/or daily logs may include comments on the Community Service participant's barriers overcome or modified; skills sets gained or upgraded; tasks mastered; and satisfactory attendance, appearance, attitude and comportment, etc. Using available information from the worksite commentary or logs, necessary activity modifications may be arranged by the case manager.

Describe how the types of community service positions that create an employer/employee relationship and are subject to the FLSA minimum wage requirements will be determined.

All Community Service positions are arranged through valid employers (social service organizations, not-for-profit agencies, state government agencies and other public entities, etc.) and include only activities that reflect the same types of work of other "real" employees at that worksite.

Community Service positions are subject to FLSA and since there are hundreds of exceptions to FLSA that are not easily identifiable for a certain employer, the employer will be required to verify if they are subject to FLSA by indicating this (in a check box) on the Community Service agreement. If the employer states they are not subject to FLSA, the TA recipient will not be placed at that worksite.

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

TA recipients may self-initiate community service positions. However, any entity wishing to be considered as an employer for the purposes of a Community Service Program must complete the "Community Service Worksite Agreement" form. The employer must provide a list of skills to be performed for each "job" opening they have.

Vocational Education and Training (not to exceed 12 months with respect to any TA recipient)

Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity.)

Missouri defines vocational education and training as any formalized training program that prepares individuals for current or emerging occupations. This training must lead to a certificate, license, or degree.

This activity includes:

- Assessment to determine if the TA recipient is able to participate in the educational or training activity,
- Vocational schools,
- Trade schools,
- Community college programs required for specific occupations,
- Proprietary schools,
- Remedial or basic education provided as a component of a vocational certificate, license or degree,
- Limited English Proficiency (LEP) provided as a component of or requirement for a vocational certificate, license or degree,
- Distance learning,
- Baccalaureate degrees,
- Advanced degrees,
- Industry skills certifications,
- One hour of unsupervised study time for each hour of class time for all programs except remedial or basic education and LEP, and
- Supervised study time for all programs.

This activity is not countable beyond 12 calendar months for any TA recipient.

The training provider must be approved by the Department of Elementary and Secondary Education (DESE) as an eligible provider.* In rare cases, these criteria may be waived on a case-by-case basis. This generally occurs when a training provider is in the process of becoming an approved entity, or when there is no approved provider in

the area and another acceptable, but not approved program is available. Providers are encouraged to obtain the necessary approval by DESE.

***Note:** The Department of Secondary and Elementary Education houses the Office of College and Career Readiness which includes Vocational-Technical Education in Missouri.

Justification of the need for training must be documented on the Individual Employment Plan (IEP). Training is only approved in growth and/or stable occupations that are directly linked to employment opportunities. In addition, if training is requested in an occupation that is in a declining field, the training is approved only if the TA recipient has a letter from a company that states the intent to hire the TA recipient upon completion of the training.

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

For assessment to determine if the TA recipient is able to participate in the educational or training activity, an hour of attendance is equal to an hour of being assessed. Attendance hours for the assessment process will not include activities that require self-attestation.

For vocational schools, trade schools, community college programs required for a specific occupation, proprietary schools, remedial or basic education provided as a component of a vocational certification, license or degree, Limited English Proficiency (LEP) provided as a component of or requirement for a vocational certificate, license or degree, baccalaureate degrees, industry skills certifications, and advanced degrees, and supervised study time, a countable hour for the vocational education and training activity is equal to one hour of "seat time" (including excused absences and allowed holidays) attending a class, lab, or organized tutoring session etc. Total homework/study time counted for participation cannot exceed one hour of class time if the educational institution advises or requires such time.

For distance learning, a countable hour is determined by the hours allowed for individuals in a classroom setting. This can be determined by the school providing a written statement or verbal statement to the case manager stating the hours of "normal" class time required or a schedule of the hours of class time per day normally required for the class. One hour of unsupervised study time for each hour of class time will be allowed for all activities under Vocational Education and training except assessment, LEP, and remedial and basic education. Total homework/study time counted for participation cannot exceed the hours required or advised by a particular educational institution.

This activity allows for Holidays and Excused Absences in accordance with the "Hours Engaged in a Work Activity" section of this plan.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.

For assessment to determine if the TA recipient is able to participate in the educational or training activity, the individual providing the assessment is required to provide signed written verification or verbal verification indicating type of assessment, date(s), time(s), and hour(s) spent. For verbal documentation, the case manager will complete a form with the TA recipient's name, Departmental Client Number (DCN), type of assessment, date(s), time(s) and hour(s), and name/title of individual providing assessment. The documentation is recorded; placed in the TA recipient's file; and tracked in the MWA System by the case manager, supervisor, office personnel, or fiscal staff.

For vocational schools, trade schools, community college programs required for a specific occupation, proprietary schools, remedial or basic education provided as a component of a vocational certification, license or degree; Limited English Proficiency (LEP) provided as a component of or requirement for a vocational certificate, license or degree; baccalaureate degrees, industry skills certifications, and advanced degrees; and supervised study time, verification of actual attendance by the TA recipient can be verified or documented by signed time sheets, or attendance records provided by the instructor or an individual in a school's official administrative setting, or by the case manager. When the case manager is verifying attendance, he/she must be in regular communication with the participant by phone, in person, or electronically in order to discuss attendance, as well as satisfactory progress, supportive services and career planning. Some programs will include "clinicals" or hands-on lab work which is part of the educational institution's scheduling practices. Actual attendance by the TA recipient can be verified or documented by signed time sheets, or attendance records provided by the instructor or an individual in a school's official administrative setting, or by the case manager. Attendance documentation will be provided every two weeks to the case manager, verifying actual attendance at each class. The attendance logs are recorded; placed in the TA recipient's file and tracked in the MWA System by the case manager, supervisor, office personnel, or fiscal staff. When the case manager is verifying attendance, he/she must be in regular communication with the participant by phone, in person, or electronically in order to discuss attendance, as well as satisfactory progress, supportive services and career planning. Satisfactory progress is determined at the institutions regular reporting intervals with documentation of the participant's grades or progress. Satisfactory progress is defined as 2.0 or above on a 4.0 scale. *(If a case manager verifies actual hours of attendance based on regular communication, and the recipient fails to demonstrate satisfactory progress at the end of an instructional period such as a quarter or semester, the standard of verification will revert to signed documentation from the educational institution.)*

For distance learning, actual attendance is verified through attendance records or log-in and log-out records available on-line or in electronic format, or by the case manager. When the case manager is verifying attendance he/she must be in regular communication with the participant by phone, in person, or electronically in order to

discuss attendance as well as satisfactory progress, supportive services and career planning. The attendance documentation is recorded; placed in the TA recipient's file and tracked in the MWA System by the case manager, supervisor, office personnel, or fiscal staff. Satisfactory progress is determined at the institutions regular reporting intervals with documentation of the participant's grades or progress. Satisfactory progress is defined as 2.0 or above on a 4.0 scale. *(If a case manager verifies actual hours of attendance based on regular communication, and the recipient fails to demonstrate satisfactory progress at the end of an instructional period such as a quarter or semester, the standard of verification will revert to signed documentation from the educational institution.)*

Total homework/study time counted for participation cannot exceed one hour of class time if the educational institution advises or requires such time. One hour of unsupervised study time for each hour of class time will be allowed for all activities under Vocational Education and training except assessment, LEP, and remedial and basic education.

Describe the methods of daily supervision for each unpaid work activity.

For assessment to determine if the TA recipient is able to participate in the educational or training activity, an hour of the attendance is equal to an hour of being assessed. Attendance hours for the assessment process will not include activities that would require self-attestation.

Daily supervision for other activities in the form of signed attendance sheets or other written or electronic methods of "check-in" is performed by the vocational education instructor or other supervisory staff. Every two weeks, the student/trainee provides these attendance documents to the case manager for entry in to the MWA System. Grades, student evaluations, and daily journals from the instructor may also be used as documentation of daily supervision and guidance.

Unsupervised study time does not require daily supervision.

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.

Missouri policy instructs staff to review the MWA System to allow TA recipients to engage in vocational education and training for only 12 months lifetime for each individual. This is monitored by state and local staff a minimum of one time annually. Missouri's Federal reporting is programmed to include edits for vocational education activities that exceed the maximum 12 month lifetime limit for each TA recipient. If a TA recipient's months exceed allowable amounts, these are not reported.

Describe how the State will ensure that basic and remedial education and Limited English Proficiency (LEP), if such activities are counted, are of limited duration and a necessary or regular part of the vocational educational training.

Limited English Proficiency (LEP), and remedial and basic education is counted as vocational education and training only if clearly required by a student evaluation stating it is needed in order to complete the required vocational coursework, or to become employable in that course of study. The LEP and/or remedial or basic education should either accompany the regularly required coursework, or be available during a summer or other "interim" session between regular terms. The LEP requirement must be embedded in the student's required coursework.

Job Skills Training Directly Related to Employment

Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity.)

Missouri includes in this definition any training or education for specific job skills required by an employer to provide a TA recipient with the ability to obtain employment or to advance or adapt to the changing demands of the workplace.

These activities may include:

- Assessment to determine if the TA recipient is able to participate in the educational or training activity;
- Customized or general training directly related to a specific job, or to prepare a TA recipient for employment in a particular occupational field;
- LEP or literacy instruction related to a specific job or occupational field;
- Post-secondary college programs leading to a baccalaureate or advanced degree and related to a specific job or occupational field;
- Distance learning,
- Any other educational setting wherein the TA recipient is gaining knowledge or skills related to a specific job or occupation, regardless of whether or not the TA recipient has gained a high school diploma or equivalency;
- One hour of unsupervised study time for each hour of class time for all programs; and
- Supervised study time for all programs.

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

For assessment to determine if the TA recipient is able to participate in the educational or training activity, an hour of the attendance is equal to an hour of being assessed.

Attendance hours for the assessment process will not include activities that would require self-attestation.

For customized or general training directly related to a specific job, or to prepare an individual for employment in a particular occupational field; LEP or literacy instruction related to a specific job or occupational field; post-secondary college programs leading to a baccalaureate or advanced degree and related to a specific job or occupational field; and any other educational setting wherein the TA recipient is gaining knowledge or skills related to a specific job or occupation, regardless of whether or not the TA recipient has gained a high school diploma or equivalency; and supervised study time, a countable hour is equal to one hour of "seat time" (including excused absences and allowed holidays).

For distance learning, a countable hour is determined by the hours allowed for individuals in a classroom setting. This can be determined by the school providing a written statement or verbal statement to the case manager stating the hours of "normal" class time required or a schedule of the hours of class time per day normally required for the class.

One hour of unsupervised study time for each hour of class time will be allowed for all activities under Job skills training directly related to employment except assessment, LEP, and literacy instruction. Total homework/study time counted for participation cannot exceed the hours required or advised by a particular educational institution. This activity allows for Holidays and Excused Absences in accordance with the "Hours Engaged in a Work Activity" section of this plan.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation

For assessment to determine if the TA recipient is able to participate in the educational or training activity, the individual providing the assessment is required to provide signed written verification or verbal verification indicating type of assessment, date(s), time(s), and hour(s) spent. For verbal documentation, the case manager will complete a form with the TA recipient's name, Departmental Client Number (DCN), type of assessment, date(s), time(s) and hour(s), and name/title of individual providing assessment. The documentation is recorded; placed in the TA recipient's file; and tracked in the MWA System by the case manager, supervisor, office personnel, or fiscal staff.

For customized or general training directly related to a specific job, or to prepare an individual for employment in a particular occupational field; LEP or literacy instruction related to a specific job or occupational field; post-secondary college programs leading to a baccalaureate or advanced degree and related to a specific job or occupational field; or any other educational setting wherein the TA recipient is gaining knowledge or skills related to a specific job or occupation, regardless of whether or not the TA recipient has gained a high school diploma or equivalency; and supervised study time, verification of actual hours is accomplished by attendance sheets or statements signed

by an instructor or other supervisory personnel. TA recipients will provide a training or class schedule to their case manager at the start of each term of the course of study or a statement from the instructor or other supervisory personnel. Some programs will include classroom training, "clinicals", and/or some type of practicum or hands-on lab work which also must be verified through the training provider or educational institution. Verification of actual attendance by the TA recipient can be verified or documented by signed time sheets, or attendance records provided by the instructor or an individual in a school's official administrative setting, or by the case manager. When the case manager is verifying attendance, he/she must be in regular communication with the participant by phone, in person, or electronically in order to discuss attendance, as well as satisfactory progress, supportive services and career planning. Some programs will include "clinicals" or hands-on lab work which is part of the educational institution's scheduling practices. Actual attendance by the TA recipient can be verified or documented by signed time sheets, or attendance records provided by the instructor or an individual in a school's official administrative setting, or by the case manager. When the case manager is verifying attendance, he/she must be in regular communication by phone, in person, or electronically in order to discuss attendance, as well as satisfactory progress, supportive services and career planning. Attendance documentation will be provided every two weeks to the case manager, verifying actual attendance at each class. The attendance logs are recorded; placed in the TA recipient's file and tracked in the MWA System by the case manager, supervisor, office personnel, or fiscal staff. *(If a case manager verifies actual hours of attendance based on regular communication, and the recipient fails to demonstrate satisfactory progress at the end of an instructional period such as a quarter or semester, the standard of verification will revert to signed documentation from the educational institution.)*

For distance learning, actual attendance is verified through attendance records or log-in and log-out records available on-line or in electronic format, or by the case manager. When the case manager is verifying attendance he/she must be in regular communication by phone, in person, or electronically in order to discuss attendance as well as satisfactory progress, supportive services and career planning. The attendance documentation is recorded; placed in the TA recipient's file and tracked in the MWA System by the case manager, supervisor, office personnel, or fiscal staff. *(If a case manager verifies actual hours of attendance based on regular communication, and the recipient fails to demonstrate satisfactory progress at the end of an instructional period such as a quarter or semester, the standard of verification will revert to signed documentation from the educational institution.)*

One hour of unsupervised study time for each hour of class time will be allowed for all activities under Vocational Education and training except assessment, LEP, and remedial and basic education.

Describe the methods of daily supervision for each unpaid work activity.

Daily supervision in the form of signed attendance sheets or other written or electronic methods of "check-in" is performed by the instructor or other supervisory staff who are

present daily at the training or classes. Every two weeks, the student/participant provides these attendance documents to the case manager for entry into the MWA System.

Unsupervised study time does not require daily supervision.

Education Directly Related to Employment, in the case of a TA recipient who has not received a high school diploma or a certificate of high school equivalency

Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity.)

Missouri includes in this activity:

- Assessment to determine if the TA recipient is able to participate in the educational or training activity,
- Adult Education and Literacy (AEL),
- Limited English Proficiency (LEP),
- High School Equivalency classes and testing,
- Literacy skills classes, and
- Supervised homework and study activities related to AEL.

These activities are considered countable only when the TA recipient is seeking or has already obtained employment where a general equivalency or high school diploma is required, or continued employment is conditional on receiving this diploma, and when necessary, LEP is a component of the course of study. TA recipients with overseas diplomas will have to be evaluated on a case-by-case basis to determine if he/she qualifies for this activity.

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

For assessment to determine if the TA recipient is able to participate in the educational or training activity, an hour of the attendance is equal to an hour of being assessed. Attendance hours for the assessment process will not include activities that would require self-attestation.

For AEL, LEP, High School Equivalency classes and testing, and literacy skills classes, a countable hour for the AEL, LEP, and etc. activity is equal to one hour of "seat time" (including excused absences and allowed holidays) attending a class or organized tutoring session. Unsupervised, informal study time is not a countable component of this activity.

This activity allows for Holidays and Excused Absences in accordance with the "Hours Engaged in a Work Activity" section of this plan.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.

For assessment to determine if the TA recipient is able to participate in the educational or training activity, the individual providing the assessment is required to provide signed written verification or verbal verification indicating type of assessment, date(s), time(s), and hour(s) spent. For verbal documentation, the case manager will complete a form with the TA recipient's name, Departmental Client Number (DCN), type of assessment, date(s), time(s) and hour(s), and name/title of individual providing assessment. The documentation is recorded; placed in the TA recipient's file; and tracked in the MWA System by the case manager, supervisor, office personnel, or fiscal staff.

For AEL, LEP, High School Equivalency classes and testing, and literacy skills classes, verification of actual hours is accomplished by attendance sheets or statements signed by an instructor or other supervisory personnel. TA recipients will provide a training or class schedule to their case manager at the start of each term of the course of study or a statement from the instructor or other supervisory personnel. Actual attendance by the TA recipient is verified or documented by the instructor or other supervisory staff. Attendance sheets, signed by the instructor or other supervisory personnel will be provided every two weeks to the case manager, documenting actual attendance at each class. The attendance logs are recorded; placed in the TA recipient's file and tracked in the MWA System by the case manager, supervisor, office personnel, or fiscal staff.

Describe the methods of daily supervision for each unpaid work activity.

Daily supervision in the form of signed attendance sheets or other written or electronic methods of "check-in" is performed by the instructor or other supervisory staff who are present daily at the classes. Every two weeks, the student/participant provides these attendance documents to the case manager for entry into the MWA System.

Describe the State's criteria for "good and satisfactory progress" and when and how it is documented.

This is no longer required per the final regulations.

Satisfactory attendance at secondary school or in a course of study leading to a certificate of general equivalence, in the case of a TA recipient who has not completed secondary school or received such a certificate

Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity.)

Missouri includes the following in this activity:

- School for teen parents up to the month he or she turns 19,
- High School Equivalency classes and testing,
- LEP classes, and
- Home schooling.

This activity is primarily used for the TA recipients up to the month he or she turns 19. This activity is the "core" activity for a TA recipient less than 19 years of age, who is the custodial parent of a minor child or children.

For home schooling, Missouri will follow the Department of Elementary and Secondary Education policies. Missouri Department of Education Home Schooling Information:

1. Any parent may educate a child at home. The parent does not have to have a teaching certificate or meet any education requirements.
2. According to Section 167.031 of the Revised Statutes of Missouri a parent or guardian of a child, between seven and sixteen years of age, shall cause the child to attend regularly some public, private, parochial, parish, home school or a combination of such schools.
3. If a parent decides to home school, he or she shall offer 1,000 hours of instruction during the school year, with at least 600 hours in the basics, which will be in reading, language arts, mathematics, social studies, and science. At least 400 of the 600 hours shall occur in the home location.
4. The school year is defined as beginning July 1 and ending the next June 30.
5. A parent who is home schooling a child must maintain the following records:
 - a. A plan book, diary, daily log, or other written record indicating the subjects taught and the activities engaged in with the student.
 - b. A portfolio containing samples of the student's academic work.
 - c. A record of evaluation of the student's academic progress.
 - d. Other written or credible evidence equivalent to a, b, and c
6. Handicapped children attending a home school program may receive special education services provided by the local school district, in accordance with Section 162.996 of the Revised Statutes of Missouri and State Plan for Special Education.
7. The law is permissive in the area of registering. The statute says the parent may notify the superintendent of schools or the recorder of county deeds in the county where the parents reside. This is to be done before September 1 annually. However, the law says may, and it is not mandatory.

For the purposes of employment and training services home schooling is defined as schooling that meets the academic definition of home schooling from Missouri law, but

may be performed in the home of someone other than the child's parent or guardian, such as the parent of another home schooled child.

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

A countable hour is equal to one hour of "seat time"; (including excused absences and allowed holidays) attending a class or organized tutoring session. A student who attends a full course of instruction of the secondary school can be "deemed" to be engaged in work. Actual hours of attendance are tracked and reported.

Unsupervised, informal study time is not considered a countable component of this activity.

This activity allows for Holidays and Excused Absences in accordance with the "Hours Engaged in a Work Activity" section of this plan.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation

Verification of actual hours is accomplished by attendance sheets or statements signed by an instructor or other supervisory personnel. TA recipients will provide a training or class schedule to their case manager at the start of each term of the course of study or a statement from the instructor or other supervisory personnel. Actual attendance by the TA recipient is verified or documented by the instructor or other supervisory staff. Attendance sheets, signed by the instructor or other supervisory personnel will be provided every two weeks to the case manager, documenting actual attendance at each class. The attendance logs are recorded; placed in the TA recipient's file and tracked in the MWA System by the case manager, supervisor, office personnel, or fiscal staff.

Describe the methods of daily supervision for each unpaid work activity.

Daily supervision in the form of signed attendance sheets or other written or electronic methods of "check-in" is performed by the instructor or other supervisory staff who are present daily at the classes. Every two weeks, the student/participant provides these attendance documents to the case manager for entry into the MWA System.

Describe the State's criteria for "good and satisfactory progress" and when and how it is documented.

This is no longer required per the final regulations.

Provision of child care services to an individual who is participating in a community service program.

*In a 2 parent family, one parent cannot count as participating by providing child care for his or her own child while the other parent participates in community service.

Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity.)

This is a structured program in which individuals provide child care for recipients in approved TANF community service program activities. It is used on a very limited basis for individuals who cannot be placed in other employment activities.

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

Program participants report actual hours of participation on time sheets and activity logs that report hours of participation for every day of every week in each month.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.

The program administrator and the participant (child care provider) sign the time sheet or activity log attesting to the truthfulness of the information provided. This documentation is submitted to the TANF agency no less frequently than once every two weeks. The written verification serves as supporting documentation that the hours of participation were actually performed for the hours claimed in the community service activity. The TANF case manager monitors the written verification and records the actual participation hours for participation rate purposes. This information is retained in the case file and documented in case notes.

Describe the methods of daily supervision for each unpaid work activity.

Service providers providing child care to community service participants using TANF child care providers must provide a structured work setting with daily supervision, evidenced by documentation such as daily timesheets or activity logs.

II. Hours Engaged in Work

Excused Absences

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

Excused absences and holidays are allowed for any unpaid work activity where a schedule has been developed and is documented using verification standards as described in this plan.

Excused absences totaling 80 hours per 12-month period, with no more than 16 hours in any given month is allowed. For counting in participation, we will consider the first 16 hours per month, for any reason, as excused absences. Absences for any reason above the 16 hours per month or 80 hours per year will be considered unexcused. For example the same TA recipient is regularly scheduled for 6 hours per day:

- Stays home on January 2nd for 6 hours with the flu, it is an excused absence.
- Stays home on January 10th for 6 hours to go to the mall, it is excused.
- Stays home on January 23th and 24th with a sick child. Four (4) hours on January 23rd is excused. The remaining 2 hours is NOT excused as the individual has exceeded the 16 hour monthly maximum. January 24th is NOT excused.

This simple rule will eliminate time consuming deliberation and inequitable "judgment calls" by case managers. TA recipients will be advised on appropriate reasons for not attending work or other activities in standard soft skills or workplace training sessions. This policy will not be disseminated to the TA recipients; it is for tracking purposes only. The TA recipient should not be aware that any absences are excused and will be encouraged to attend all scheduled hours.

Missouri also considers holidays as participation as long as the hours are regularly scheduled participation hours for the TA recipient. This can be determined by past or future schedules.

The Holiday absence policy is based on the school/employer or other service provider's observation of the holiday. Holidays up to 10 count.

Documentation for excused absences and holidays is included in the documentation of participation hours. Timesheets will include a field to indicate a holiday or absence and the documentation is recorded; placed in the TA recipient's file and tracked in the MWA System by the case manager, supervisor, office personnel, or fiscal staff.

Missouri's Federal reporting is programmed to include edits for holidays that exceed 10 per year and excused absences that exceed 80 hours per year and 16 hours per month. If a TA recipient's hours or days exceed allowable amounts, these are not reported.

FLSA Deeming

If the State wishes to use the "deeming" provision permitted at 261.31 and 261.32 for work experience or community service programs, describe how the State determines the work hours requirements, including how the monthly TANF grant and food stamp allotment are combined and divided by the appropriate minimum wage to meet the "core" participation requirement. Include a statement certifying that the State has adopted a Simplified Food Stamp Program in order to count the value of food stamp benefits.

If State policies or procedures differ for work experience and community service programs on FLSA deeming, the State should make those differences clear.

Missouri has received approval to operate a simplified Food Stamp program, and is therefore permitted to combine the TANF grant and the Food Stamp allotment less child support retained by the state to arrive at the maximum weekly hours for each work experience and Community Service Program participant. TA recipients who "work" the monthly calculated hours are "deemed" to meet their core participation requirement, even if the calculated hours do not equal the requirement.

For TA recipients in work experience or a community service program, a countable hour is equal to an hour of attendance at the worksite. To determine countable hours allowed under this activity, the value of the monthly TANF cash grant is added to the household's monthly food stamp allotment less child support retained by the state and divided by the state minimum wage. The MWA System calculates the allowable hours and will not allow an entry of participation hours that exceeds the maximum allowed. The hours are verified and tracked by attendance sheets, daily logs, or other documentation outlined elsewhere in this document under the work experience activities.

Work experience and community service program positions are subject to FLSA and since there are hundreds of exceptions to FLSA that are not easily identifiable for a certain employer, the employer will be required to verify if they are subject to FLSA by indicating this (in a check box) on the AWE/CWE agreement. If the employer states they are not subject to FLSA, the TA recipient will not be placed at that worksite.

III. Work-Eligible Individual

The State must describe:

❖ *Procedures for identifying all work-eligible individuals;*

Missouri defines a work-eligible individual as:

- Adult receiving assistance,
- Minor child head of the household receiving assistance, or
- Non-recipient parent living with a child receiving such assistance; unless the parent is one of the following:
 - A minor parent who is not a head-of-household,
 - Alien who is ineligible due to immigration status,
 - A recipient of Supplemental Security Income (SSI) and/or Social Security Disability Insurance (SSDI) benefits on a case-by-case basis.

These individuals are identified and maintained in Missouri's interactive eligibility determination system, known as FAMIS. Individuals who apply for or receive assistance under TANF or a separate state program are identified in the system by a code. This code is used in conjunction with relationship identifiers, age information, and citizenship status codes to identify the work-eligible individuals listed above.

Individuals are considered work-eligible unless they are:

- Needed in the home to care for a disabled family member, who is living in the home as verified by medical documentation to support the need for the parent to remain in the home to care for the disabled family member,
- A minor parent who is not a head-of-household,
- Alien who is ineligible due to immigration status, or
- A recipient of Supplemental Security Income (SSI) and/or Social Security Disability Insurance (SSDI) benefits on a case-by-case basis.

Missouri will utilize the option to revise work participation data retroactively for those TA recipients who were approved for SSI or SSDI in the preceding fiscal year.

If an individual is determined by the Family Support Division eligibility specialist to be non-work-eligible, a code is entered into FAMIS to identify them as such.

❖ *How the State ensures that, for each work-eligible individual, it*

1. *Accurately inputs data into the automated data processing system,*
2. *Properly tracks the hours, and*
3. *Accurately reports countable hours to HHS that do not include participation in an activity that does not meet a Federal definition.*

Family Support Division eligibility specialists are required by policy to enter the correct work requirement code into the automated data processing system. The code is updated when the individual's situation changes.

The FSD's automated data processing system has edits in place to check for the appropriate coding entry. Administrative reports are generated to help track entries and monitor the accuracy of coding to reflect policy. The universe of TANF cases is created by extracting information from the FSD and MWA systems. Case data for these cases is then compiled from both systems to identify and match all individuals who are required to participate in work activities.

The MWA provider is required to enter and update the individual's hours of participation into the MWA System, based on acceptable verification as described in this plan.

In Missouri, the MWA provider is responsible for ensuring that the people who have been referred for individual employment planning participate in work. The MWA provider will work with an individual to help them determine how they can meet their requirements. Once it has been determined how an individual will meet their requirements, the MWA provider will record the individual's participation in work activities. Missouri tracks 20 different component activities shown on the chart below. These component activities closely correspond to the federal Adult Work Participation Activities but are not identical. The chart below depicts ACF Adult Work Participation Activities on the left and Missouri's component activities on the right.

ACF Work Activities	Component Activity	Component Activity Description
Unsubsidized Employment (item 50)	EMP	Unsubsidized Paid Employment Comp in Lieu of Wages Self-Employment Work Study
Subsidized Private Sector Employment (item 51)	EPR	Subsidized Employment - Private Sector
Subsidized Public Sector Employment (item 52)	EPU	Subsidized Employment - Public Sector
Work Experience (item 53)	CWP	AWEP/CWEP
On-The-Job Training (item 54)	OJT	On-The-Job Training
Job Search and Job Readiness Assistance (item 55)	JBR JBS TSA	Job Readiness Activities Job Search Other-Does Not Meet Core/Non-Core Hours
Community Service Programs (item 56)	CSR	Community Service

Vocational and Educational Training (item 57)	VOC	Vocational Education And Training
Job Skills Training Directly Related to Employment (item 58)	JST	Job Skills Training
	AEL	Adult Education And Literacy
	ESL	Limited English Proficiency
Education Directly Related to Employment for individuals with no High School Diploma or High School Equivalency (item 59)	HSE	High School Equivalency
	REM	Remedial Education
School Attendance for Individuals with no High School Diploma or Certificate (item 60)	HIS	High School
	JHI	Junior High
Providing Child Care Services (item 61)	CCS	Providing care services to someone participating in Community Service activities
Not Counted Other (item 63)	AST	Assessment – Not related to a specific activity
	CON	Conciliation
	REF	Refugee/Resettlement Activity
	TWV	Temporary Waiver

Limited Work Participation Activities

Job Search/Job Readiness - Each month the FSD stores the TANF family, adult, child and SSP MOE family, adult, and child information which is being sent to the federal government plus some additional information (e.g., number of Job Search/Job Readiness weeks completed this FFY). When the TANF Data Analyzer is run for a selected month, the previous month's information is read. The TANF Data Analyzer confirms that for a given TA recipient, job search component activities may only be counted for four consecutive weeks and 120 hours or 180 hours (depending on the weekly core hour requirement) or 240 or 360 hours if a "needy" state within a single FFY. Each time an individual reaches 20 (or 30) hours, one of the four consecutive weeks is used. If the hourly limit has been exceeded, the hours a TA recipient is participating in job search/job readiness will be accounted for under the Other Work Activities (item 63).

Vocational Education and Training - To determine whether a Vocational and Educational Training component activity can be counted as work participation, the TANF Data Report Analyzer reads the historical TANF adult data to determine how many months a TA recipient has been part of a TA household receiving benefits, is receiving Vocational and Educational training, and meets

the work participation requirements. If this lifetime limit has not exceeded 12 months, the vocational and educational training will be included when evaluating work participation. If the twelve month limit has been exceeded, the hours a TA recipient is participating in vocational and educational training will be accounted for under the Other Work Activities (item 63).

Not Counted - There are four component activities Missouri tracks that cannot be accounted for in the ACF Adult Work Participation Activities. They are Assessment (AST) not related to a specific activity; Conciliation (Con); Refugee/Resettlement Activity (REF); and Temporary Waiver (TWV). These component activities are not counted at all.

Documenting Hours of Participation- To determine which component activities a TA recipient has participated in for the selected month, the FSD reads the component activity table where DA_END after the beginning of the selected month and the DA_BEGIN before the End of the selected month. In this way if a component activity is started sometime after the beginning of the month or ends before the end of the month the system still picks up the portion of the component activity performed within the selected month. Missouri has elected to count activity by week using the Friday enrollment method. If someone is enrolled on the Friday the hours associated with the component activity are counted for that week.

The MWA provider is required by policy to inform the TA recipient of the required hours of participation as a part of the enrollment process. Participation hours are updated or changed as necessary, based on the TA recipient's circumstances. When the TA recipient becomes engaged in an allowable work activity, the MWA provider enters the hours of participation for that activity in the MWA System.

IV. Internal Controls

The State is required to describe internal controls that ensure a consistent measurement of the work participation rates. The Work Verification Plan should contain a clause confirming that the State will maintain all pertinent findings produced through its internal control processes and that these findings will be available for use by ACF and other auditors in their review of the States' work participation verification system.

- 1. Describe the internal controls designed to ensure established work verification procedures are properly being employed. Such controls may include supervisory guidance, policy directives, and staff training plans, as well as quality assurance processes, such as monitoring procedures to ensure adherence to procedures by staff, providers, and contractors. For example, to ensure the State is identifying all work-eligible individuals, a State may periodically check the disability status of a family member who is temporarily disabled, as the parent caring for the disabled family member would become a work-eligible individual once the family member is no longer disabled.*

In Missouri, the Department of Social Services serves as the TANF agency and its Family Support Division is responsible for the Temporary Assistance program, including the employment and training portion, known as Missouri Work Assistance.

Three levels of supervision are identified in the MWA Program: the state level (FSD); the Contractors and the sub-contractor level (contracted to the Contractors). The State of Missouri contracts with the Contractors to provide a variety of services. The Contractors are the pipeline to the sub-contractors who also provide the services to the TA recipients at the local level. Therefore, the sub-contractors answer to the Contractors and the Contractors are held accountable to the State of Missouri. In both instances a signed contract with a scope of work outlines the responsibilities of each party to secure the success of the Missouri Work Assistance program.

State policy, developed by the FSD/MWA staff with input and feedback from Contractor staff, is regularly updated or modified to reflect any federal, state, or other changes.

In the nineteen MWA Regions in Missouri, the FSD MWA Unit staff is the point of contact and assists in maintaining daily operations at the local level. MWA contracted providers are responsible to ensure accurate data is obtained and entered into the MWA System in a timely manner. If information is entered in error that affects the TA participant's services or benefits, MWA Unit staff has a process to correct the data. A state developed form is signed off by a designated and authorized staff person at the provider level and sent to MWA Unit staff for review and either approval or denial. If the form is approved, the approved change is entered in the system. If it is denied, the form is returned to the individual who submitted it with an explanation of the denial. This provides two opportunities for the record information to be analyzed, at the local level and at the state level. It further allows an opportunity to identify and provide technical assistance to contracted providers who work with the MWA Program.

In the MWA System and in local offices, specific contracted provider staff is assigned to each TA recipient that enters the program. However, a TA recipient may be served anytime, at any location that provides MWA services. When a contracted provider works with a TA recipient and provides a service or places them in an allowable or countable activity, the service is electronically documented into the MWA System. If a TA recipient is placed in a paid activity, Missouri has work verification procedures in place in the MWA System to automatically pass pertinent information to the FSD for a determination of continuing eligibility and to document and verify attendance at a countable activity for purposes of transportation reimbursement, and other work-related supports.

The FSD/ MWA Unit provides notification of webinars, policy, FAQ's, and "cheat sheets" to contracted providers so they can provide training to their staff to ensure policies and procedures are followed. Monthly case reviews are conducted by MWA Unit staff employing a review document that evaluates policy and procedure compliance, case management, and verification and documentation of activities and participation, allowing them to address any misinterpretation of policy and/or procedures with the provider. At the conclusion of the monthly reviews, outcomes are presented to the contract provider with findings, recommendations and required corrections.

In addition, MWA Unit staff performs on-site monitoring, to include policy, procedure and fiscal review. This review includes record review, interviews with recipients, provider staff, sub-contractors and community partners. At the conclusion of the on-site monitoring, the FSD MWA Unit staff participates in an interactive exit conference with the contracted provider, discussing findings of fact and subsequent necessary corrective action. A final report is submitted to the contracted provider with an opportunity to respond.

2. *Describe the internal control for data errors, including transcription and coding errors, data omissions, computational errors, and compilation errors. For example, a State might automatically review the case record of each work-eligible individual whose reported average weekly hours of participation are unusually high (e.g., 70 or more hours per week) by examining the documentation used to support those hours.*

The MWA System is a consolidated computer web-based system administered by the Department of Social Services and used by contracted providers to record and track recipient employment and training services.

The MWA System is a comprehensive case management data system for TA recipients, recording and tracking progress, participation in activities, actual participation hours, case history, IEP, assessments, work histories, supportive service payments, and all other aspects of case management. The system integrates records from state and contracted providers to assist in delivery of seamless services. Absences, holidays, and actual hours of participation are tracked by attendance documents that must be signed off by the appropriate personnel to verify participation. The attendance documentation

is entered into the MWA System's Participation Hours Verification and also kept in the hard copy file.

To reduce the instances of inaccurate work histories and invalid income reporting to the FSD, the MWA System allows partial employment information to be recorded prior to verification. This triggers an alert to the FSD of the pending or unverified employment only. The contracted provider or the eligibility specialist then completes the process by obtaining verified and documented employment information suitable for eligibility and hours of participation purposes. Transportation reimbursement cannot be authorized until the employment is verified and recorded in the MWA System.

The MWA System contains the following functionality to ensure optimal case management and accuracy of records:

- Automatically closes open services when the TA recipient case closes
- Eliminates the redundant paper process by encompassing all forms in the system, automatically populating, and allowing printing
- Creates task for the case manager regarding changes in the TA recipients file including: work status, address changes, appointment changes, etc.
- Allows the case manager to set additional tasks
- Automatically projects hours for allowable activities based on the verified information entered into the system
- Provides the TANF and Food Stamp issuance amounts, updated monthly, for calculation of AWEPC/WEPC and Community Service participation hours
- Provides a case management list for case managers and supervisors to review indicating all TA recipients "assigned" to a specific case manager
- Displays TA recipient information loaded from FAMIS updating all TA recipient records including: names, addresses, phone numbers, Vocational Education and Training months remaining, children under 6 and TA recipients receiving federally funded child care.

The MWA Case Management System includes administrative reports to assist supervisors and case managers to oversee caseloads. Reports are available by MWA region, subcontractor location and individual case manager. Administrative reports available in the MWA System are:

- Case Manager Caseload Report - identifies active records assigned to an individual case manager;
- Supervisor Staff Listing Report - identifies all staff assigned to a supervisor and the total number of participants per staff member,
- Staff Details Report - provides a listing of staff assigned to the region, including their user id and role,
- Temporary Waiver Report - provides details for a region and/or office location on all participants in waiver status,

- Sanction Alert Report- provides detailed information regarding participants for whom sanctions have been requested, date sanction imposed, and current sanction status,
- TRE Report- provides detailed transportation reimbursement payment data based on the federal work week,
- WRE Report- provides detailed work related expense payment data
- Employment Alert Report – provides information if the MWA provider validated the income or if it is pending verification
- Address Change Alert Report – provides information the client has moved
- Activity Report – provides the client's participation, required hours and actual participation hours

The FSD prepares a file monthly of historical work activities that have been performed, in addition to all current activities. This information is loaded into the data warehouse for reporting uses.

The FSD has developed processes to read the work activity table and relate this information to the current set of TA recipients. The FSD verifies that any work activities with limits such as Job Readiness/Job Search are edited so the system does not report work activities that do not meet the federal requirements. This information is analyzed to determine for which weeks the work activity applies and a determination is made as to whether the TA recipient has met work participation requirements.

The TANF Data Report information is gathered from multiple systems and assembled and the files transmitted to ACF.

3. *Describe the checks used to isolate electronic systems and programming errors and the steps to ensure that all work participation report items are internally consistent. For example, a State might obtain the raw data (prior to input into an automated data processing system) for a sample of work-eligible individuals and determine manually the average weekly hours of participation for each work activity for a month and compare that result to what the State actually reported to HHS.*

Monthly data is obtained to ensure that all work participation report items are internally consistent. Administrative reports are used to monitor and ensure the data is correct before sending the information to HHS, quarterly.

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

Inconsistencies

In addition to the edits within the eligibility determination process, the FSD is currently conducting an effort to go back and verify the quality of the work participation data. Procedures have been developed to gather information from the FSD's eligibility determination automated system, known as FAMIS, including child care payments, food stamp payments, TANF payments, Medicaid enrollment, income sources, Eligibility Unit (the TANF family), and Eligibility Unit Member (the TANF family member) information. Information is also gathered from external systems such as the Missouri Automated Child Support System (MACSS). This information is sent electronically to the TANF Data Analyzer. For each Eligibility Unit, the program reads the MWA work activity information. During the process of analyzing a case, the program is able to look at the entire case. While analyzing each Eligibility Unit, inconsistencies may be found such as a case which has been exempted from work participation where there is no exemption reason code, or MWA component activities reflect someone has a new job but the FAMIS eligibility system does not reflect a new income source. When these issues are discovered, FSD staff review both the TANF and MWA data and take action to resolve the inconsistencies.

Reporting Month

The FAMIS eligibility and payment files for the reporting month are used to determine TA recipients who are included in the federal report—active or closed. These files are used to create data sets which are combined into the federal report. Cases/individuals who have received a payment during the reporting month are included in the active cases; cases that were closed during the month are included as closed.

Stratum and Case Number

The same files are used to determine the stratum. Individuals are matched to the appropriate case by the Departmental Client Number (DCN), a unique number assigned to every FSD applicant or TA recipient. Strata are created this way, as are unique case identification numbers.

Disposition

Explained above in Reporting Month.

Type of Family for Work Participation

The data entry system in FAMIS captures types of assistance, dates of birth, relationship codes, and marital status. The FSD determines adults by case DCN first—if a TA recipient is the case head-of-household, he or she is considered an adult. If there are two work eligible parents on the case, then the case is considered a two-parent family.

Family Affiliation Code

The FAMIS data entry system provides information regarding relationships among individuals on a case. Non-custodial parent information used for reporting purposes is obtained by a data match with Child Support.

Non-custodial Parent Indicator

As previously stated, non-custodial parent information used for reporting purposes is obtained by a data match with Child Support.

Date of Birth (Adult and Child)

Data entry workers are responsible for entering this information when an individual applies for public assistance. The data is captured on the files the FSD uses.

Parent with Minor Child

The FAMIS data entry system provides information regarding relationships among individuals on a case. Parents of minor children are included.

Work-Eligible Individual Indicator

If a TA recipient is not coded as exempt or excluded (as allowed under federal law), he or she is considered to be work-eligible.

Describe the States procedures 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.

Describe the States' procedures 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.

Describe the State's procedures for ensuring a family deemed engaged in work based on 20 hours of participation in countable work activities meets the requirements of a single custodial parent or caretaker relative with a child under age six.

Historical data sets have been created, and are added to, for each month. These data sets are used to determine who is to be included in determining the participation rate. The FSD captures:

- The TA recipient's DCN and attaches a counter to it to determine the number of allowable months for the following:
 - Single custodial parent with a child less than one year of age (12 months per lifetime), and
 - Work-eligible individual who refuses to participate in work activities (3 months per 12 consecutive months).

- All hours of participation in component activities are counted regardless of whether the participation requirement is 20 or 30 hours per week.

CERTIFICATION

This is to certify that Missouri's TANF Work Verification Plan dated August 21, 2015, includes all the information required by the regulations at 45 CFR 261.62(b) and accurately reflects the provisions under which Missouri will be operating effective August 28, 2015.

A handwritten signature in black ink, appearing to read "Patrick Luebbering", is written over a horizontal line.

Patrick Luebbering, Acting Director
Family Support Division