



A Tradition of Stewardship  
A Commitment to Service

NAPA COUNTY HEALTH AND HUMAN SERVICES AGENCY  
Self Sufficiency Services Division

**POLICY AND PROCEDURE:**

**Work Verification**

**REVIEW FREQUENCY:**

Every two years

POLICY # 2000601-2017-17

**DISTRIBUTION:**

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> Employment Services | <input type="checkbox"/> Eligibility Services    |
| <input type="checkbox"/> CSOA                           | <input checked="" type="checkbox"/> Quality Mgmt |

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<b>APPROVAL:</b>	<i>Teresa Brown</i>	<i>8/23/17</i>
	Employment Services Manager	Date
<b>APPROVAL:</b>	<i>Lynn Berg</i>	<i>8/26/17</i>
	SSSD Deputy Director	Date
<b>APPROVAL:</b>	<i>Jimmy [Signature]</i>	<i>8-29-17</i>
	HHSA Director	Date

**POLICY STATEMENT:**

It is the policy of the Napa County Health and Human Services Agency (NCHHSA) to abide by the Work Verification Requirements set forth by Section 261.62 of the Temporary Assistance for Needy Families (TANF) interim final regulations.

**ADMINISTRATION:**

Employment Services Worker (ESW)

**DEFINITIONS:**

**Adult** – An adult is a person who is either:

- Nineteen years of age or older.
- Eighteen years of age and head of household
- A minor head-of-household, including a teen parent married to the head-of-household.

**Preceding 12-month period** – The current month for which the county is reporting and the 11 previous months.

**Example:** The county is to report for September. September is over, so it looks back over the past 12 months (September through the previous October)

**END OF POLICY**

## PROCEDURE

### **I. Work Eligible Individuals**

- A. A work eligible individual is an adult (or minor child head-of-household) receiving assistance under TANF or a Separate State Program, or a non-recipient parent living with a child receiving such assistance unless the parent is:
1. A minor parent and not the head-of-household
  2. A non-citizen who is ineligible to receive assistance due to his/her immigration status
  3. A recipient of SSI or SSDI benefits
    - a. Adult applicants of SSI or SSDI may be retroactively determined to be not work eligible once they are approved for SSI or SSDI benefits.
      - 1) Once an SSI or SSDI approval is received, the ESW shall review the case to determine if WPR data has been submitted for this case back to the beginning of the federal fiscal year.
        - i. If WPR has been submitted, the ESW will request the E2lite case back from the CalWORKs (CW) Staff Analyst.
  4. A parent providing care for a disabled family member living in the home
    - a. A CW 61 or other medical documentation must be obtained showing the need for the parent to remain in the home to care for the disabled family member.
      - 1) The family member must be actively seeking treatment, if appropriate.
      - 2) Family member means the individual is a relative living in the household. A relative may be any relation by blood, marriage, or adoption who is within the fifth degree of kinship to the dependent child.
    - b. Disabled means the individual is receiving benefits from State Disability Insurance, Worker's Compensation Temporary Disability Insurance, In-Home Supportive Services, or the State Supplementary Program, or the individual has provided verification from a doctor of his/her disability.
    - c. Adults – Disabled also means the individual is temporarily disabled and the disability is expected to last at least thirty (30) days and significantly impair the individual's ability to be regularly employed or participate in activities.
    - d. Children – The disability significantly impairs his/her ability to participate in school activities.
  5. An Individual in a family receiving Maintenance Of Effort (MOE)-funded assistance under an approved Tribal TANF program.
- B. If a participant's status changes during the report month from work eligible to non work eligible or vice versa, the individual is considered work-eligible for the report month.
- C. Individuals not considered to be work eligible include:
1. Non-recipient non-custodial parents who are not living with the aided child
  2. Non-needy caretaker relatives
  3. Long Term Sanctioned participants receiving aid code K1 or 3F
  4. CalWORKs timed out individuals

### **II. Countable Work Activities**

- A. Unsubsidized Employment – Full or part time employment in the public or private sector that is not subsidized by TANF or any other public program. Unsubsidized employment includes self-

employment and recipients whose employers claim a tax credit for hiring economically disadvantaged workers.

1. Apprenticeship programs that allow participants to earn money while they practice the trade under the supervision of a journey person and attend classes are also considered unsubsidized employment.
  2. Only the hours that are paid by the employer are counted as unsubsidized employment.
  3. Hours of participation in various barrier removal activities, such as mental health, substance abuse, and/or rehabilitative services, can count under this activity if these activities are integrated parts of unsubsidized employment. In order to count, the participants must be paid for all of the hours they participate in such activities. If the individuals are not paid while participating in these activities, the participation will be reported as a blend of unsubsidized employment and another appropriate activity. (Such as job search and job readiness assistance).
- B. Subsidized Private Sector Employment and Subsidized Public Sector Employment - Employment in the private and public sectors for which the employer receives a subsidy from TANF or other public funds to offset some or all of the wages and costs of employing a work eligible individual. Subsidized work may include:
1. Work supplementation where TANF funds that would otherwise be paid as assistance are paid to the employer or to a third-party contractor, like a temporary staffing agency, which serves as the employer of record and is paid a fee to cover salary, expenses and success in placing employees
  2. Supported Work for individuals with disabilities in an integrated setting
  3. Work Study Activities
  4. Paid barrier removal and educational activities
    - a. Hours of participation in various barrier removal activities, such as mental health, substance abuse, and/or rehabilitative services, can count under this activity if these activities are integrated parts of subsidized employment. In order to count, the participants must be paid for all of the hours they participate in such activities. If the individuals are not paid while participating in these activities, the participation will be reported as a blend of subsidized employment and another appropriate activity. (Such as Job search and job readiness assistance).
- C. Work Experience (WEX) – Unpaid training activity performed in the public or private sector, as well as a nonprofit, community-based, or faith-based setting that helps provide basic job skills, enhances existing job skills in a position related to the participant’s experience, or provides a needed community service that shall lead to unsubsidized employment.
1. Hours of participation in various barrier removal activities, such as mental health, substance abuse, and/or rehabilitative services, can count under this activity if they are integrated parts of work experience.
- D. In-Kind Income – These activities can be counted under whichever federal work activity best meets the definition of the “work.” If the ESW has determined, after reviewing the duties associated with the in-kind activity, that participation in this type of activity will assist the individual in attaining self-sufficiency and has included the in-kind income activity in the individuals WTW 2, the hours or participation may be counted under the appropriate work activity.
1. These hours should be readily identifiable, on an ongoing basis, through the review of the duties, as well as discussions with the participant and monitoring of the participant’s participation.

- E. On-the-job-training (OJT) – Training in the public or private sector that is given to a paid employee while he or she is engaged in productive work. OJT provides knowledge and skills that are essential to the full and adequate performance of the job. The employer is subsidized to offset the training costs.
1. Supported work may be counted as OJT if it includes significant training in the skills and knowledge essential to job performance. OJT may also include orientation and classroom instruction required by the recipient’s employer and/or case manager. In some instances, training (e.g. tax preparation) or continuing education (e.g. nursing) is a necessary and regular element of employment. OJT may include participation in these types of activities when the individual is reimbursed for the training costs. When the individual is not reimbursed for training costs, the participation counts as job skills training directly related to employment, education directly related to employment, vocational education training, or job search/job readiness assistance, as appropriate.
- F. Job search and job readiness assistance – Job search is an activity in which the participant’s principal activity is to prepare for or to seek employment. Job Search includes looking for suitable job openings, making contact with potential employers, applying for vacancies, and interviewing for jobs. Job readiness assistance is an activity that provides a recipient with training to learn basic job seeking and interviewing skills, to understand employer expectations, and to learn skills designed to enhance an individual’s capacity to move toward self-sufficiency.
1. Job Search is allowed for a maximum of four (4) consecutive weeks and up to 120/180 hours total in the preceding twelve (12) months. Single custodial parents with a child under six can have up to 120 hours and all others can have up to 180 hours. Any participation during a week (even 1 hour) triggers the start of one of the four weeks. Whether the actual participation is one hour or 30 hours during the week, one full week would be counted toward the four consecutive week time limit.
    - a. For months that California has an unemployment rate of 50% or greater or is deemed a “needy” state, the limit on job search and job readiness is increased to a maximum of twelve (12) weeks in the preceding 12-month period.
  2. The four-consecutive week and six week time limits operate differently. The four-consecutive week operates where reporting any hours in a week uses a week of participation. The six week limit is converted to hours based on a participant’s federal hours per week work requirement – 120 for single custodial parents with a child under six or 180 for all others and operates like an accrual system. Each time a participant reaches 20 hours (single custodial parents’ w/child under six) or 30 hours (all others), a week towards the participants six week limit is used up regardless of how many calendar weeks that participation occurred in. There must be a break of at least seven consecutive days between every four consecutive weeks. (See Attachment #1 for example).
  3. For two-parent families, the four-consecutive week and six-week limits apply to each individual separately.
  4. Job readiness assistance also comprises the following activities:
    - a. Preparing an individual to obtain or retain employment, such as preparing a resume or job application, improve interviewing skills, obtain instruction in work place expectations, and life skills training.
    - b. Substance abuse treatment, mental health treatment, or rehabilitation activities for those who are otherwise employable. Treatment or rehabilitation services can include

residential treatment, group or individual therapy, support group, or participation in Alcoholics Anonymous and/or Narcotics Anonymous.

- c. On a case-by-case basis, domestic abuse services that address barriers to employment.
    - 1) Treatment and services for domestic abuse victims include the following activities when needed to seek or prepare for employment: individual counseling of the participant and children; group counseling; substance abuse services; medical and public health services; mental health services; independent living skills; financial planning and life skills training.
    - 2) These services must be necessary to prepare the individual to obtain or maintain employment or participate in WTW activities. If any portion of the treatment meets the definition of another work activity, then those hours would be reported under that activity.
  - d. Drug testing for a specific job classification and taking tests to qualify for specialized certificates. These activities will be assigned to the extent they are determined necessary for the participant to obtain or prepare for employment or participate in other Welfare-to-Work (WTW) activities.
  - e. Participation in orientation, appraisal, or assessment.
  - f. Online distance learning activities could include, but are not limited to, searching for job vacancies, submitting resumes and completing applications.
  - g. Reasonable transportation time between job interviews. This does not include transportation to the first interview of the day or from the last one of the day.
5. If participation in other federally allowable activities meets or exceeds the core hourly participation requirement, the participant is not meeting the core activity requirement, or the 4 to 6 week limit in a 12 month period has been exceeded, then the hours of participation in job search and job readiness would be reported as "Other Work Activities"
- G. Community Service – Training that is temporary and transitional, is performed in the public or private nonprofit sector, and provides basic job skills that may lead to employment while meeting a community need. Other activities may be included within the community service programs. In these situations, short-term training or equivalent activities will be included if they are of limited duration (usually no longer than six months) and are necessary for participation in the community service activity.
- H. Vocational Education – Organized educational programs that are directly related to the preparation of individuals for employment in current or emerging occupations. Vocational Education must be provided by vocational-technical schools, postsecondary institutions and proprietary schools.
1. In some instances, the vocational educational training will be completed as part of distance learning. Participation will count toward vocational educational training hours only when the time spent can be monitored by the service provider and reported to the county.
  2. Participation in vocational education training beyond the 12-month limit may count as job skills training directly related to employment or education directly related to employment, whichever definition is applicable, only after the core hourly requirement has been met from participation in other core activities.
  3. If participation in other federally allowable activities meets or exceeds the core hourly participation or hours in vocational education do not, alone, or when combined with another activity meet core hourly participation, the time spent in this activity should be reported as "Other Work Activities."

- I. Job skills training directly related to employment – Training or education for job skills required by an employer to provide an individual with the ability to obtain employment or to advance or adapt to the changing demands of the workplace. The activity may include either customized or general training to prepare an individual for employment including literacy and language instruction and other remedial education. Job skills training directly related to employment may include four-year bachelor degree programs at any State-certified college or university.
  - 1. Job skills training may be completed as part of distance learning. Participation will count toward job skills training directly related to employment only when the time spent in the distance learning component can be monitored by the service provider and reported to the county and documented in the case file.
  - 2. Activities may include vocational educational training that has been extended beyond 12 months.
- J. Education directly related to employment – Education related to a specific occupation, job, or job offer. The activity is primarily for adults and includes adult basic education and ESL and, where required as a prerequisite for employment, education leading to a General Educational Development (GED) or high school equivalency diploma.
  - 1. In some instances, the education directly related to employment will be completed as part of distance learning. Participation will count toward education directly related to employment only when the time spent in distance learning can be monitored by the service provider and is reported to the county.
  - 2. Activities may include vocational educational training that has been extended beyond 12 months.
- K. Satisfactory school attendance at secondary school – Regular attendance, in accordance with the requirements of the secondary school or course of study, at a secondary school or in a course of study leading to a certificate of general equivalence, in the case of a work eligible individual who has not completed secondary school or received such a certificate. Satisfactory school attendance is primarily an activity for minor parents and will only include other related educational activities, such as adult basic education or language instruction, when they are required for completion of a GED credential. Hours of participation attending high school in a vocational education track may be counted under this activity.
  - 1. Case management services are provided to minor parents in this activity which involves directing and coordinating a recipient’s educational, health, and social services and may include ESL, career training, alternative school, tutoring, dropout prevention, and teen pregnancy or parenting programs.
  - 2. A participant who is married OR a single head-of-household under 20 years old counts as engaged in work (hours are deemed) if he/she:
    - a. Maintains satisfactory attendance at a secondary school or the equivalent during the month, or
    - b. Participates in Education Directly Related to Employment for an average of 20 hours or the actual hours of participation.
  - 3. In some instances, the education directly related to employment will be completed as part of distance learning. Participation will count toward education directly related to employment only when the time spent in distance learning can be monitored by the service provider and is reported to the county.
- L. Providing child care services to an individual who is participating in a community service program - Providing child care to enable another TANF recipient to participate in a community

service program. The activity does not allow for one parent in a two-parent case to care for his/her own child(ren) in the home.

### **III. Verifying Hours**

- A. Actual hours, including those verified through the Work Number and other third party verifications (such as Income and Eligibility Verification System (IEVS)), continue to be the source of the most accurate and acceptable means of reporting hours of participation in any activity.
- B. When actual hours for any activity are not available in the case file (and the ESW is unable to project hours for a work activity), or if clarification is needed, the ESW will seek the hours of participation from the recipient. If the information is not available from the recipient, the ESW shall work with the individual to obtain the information by placing a phone call to the employer/service provider or sending a letter to verify the participant's hours of participation.
  - 1. Any such communication must include the participant's name, the name of the employer, work site supervisor or other service provider, the number of hours, and the name and phone number of the person verifying the hours.
  - 2. Documentation and verification must be documented in the case file.
- C. Third-party sources of employment information, such as the Income Eligibility and Verification System (IEVS) matches may be accessed when additional employment information is necessary. Prior to counting these hours, the information from third-party sources will be verified through collateral contact.
- D. The Work Number is a resource that can be used by the ESW to verify employment. ESWs are permitted to use the information obtained from this source in the same manner as they would use information provided by the employer. Therefore, no further verification is necessary when using The Work Number.
- E. Partial Month of TANF assistance – If a family receives assistance for only part of the month, the average weekly hours or participation are computed by dividing the total number of participation hours for the period of aid by the number of weeks for which the family received assistance in the month. Round the result to the nearest whole number.
- F. Partial Month of TANF Participation – If a participant is aided for an entire month, but the individual only participates for part of the month, the average weekly hours are computed by dividing the total number of actual participation hours for the month by 4.33. Round to the nearest whole number.

### **IV. Approved Verification**

- A. Unsubsidized Employment, Self-Employment; and Subsidized Private and Public Sector Employment
  - 1. Actual hours of work may be documented and verified during the eligibility process, if reported, during the initial application, annual renewal, the SAR 7 process, voluntary reports and/or other records in the case file. Evidence must be submitted with the eligibility forms, which is signed by the head-of-household under penalty of perjury, to document and verify the reported information.
  - 2. Projection of employment hours for a maximum of six months based on the most current, documented, and verified actual hours. In order to project hours, the actual hours must be available, or the total income and the hourly wage must be available.
    - a. When projecting hours, the most recent report on hours of participation must be used for any of the future six months.

- b. If the actual hours of participation for a month are known, actual hours should be used and not the projection.
  - c. Hours or participation from a current month may not be used to project hours for a past month.
  - d. If actual hours from a single calendar month are the most current, verified and documented, these hours may be used for projection purposes. The ESW must accurately determine the actual hours worked in the single calendar month if pay stubs, etc cross into multiple months. If any updated hours for the sample month are reported, projections must be recalculated.
    - 1) There are two exceptions in which actual months from more than a single month may be used to project hours:
      - i. If the actual hours of participation from income reported on the SAR 7, which was used to determine the family's grant for the next six months, had hours and income received from two months, those same hours can be used to project hours of participation for up to six months. If any changes to the actual hours are reported, the projected hours must be recalculated based on the most recent report of hours. (See Attachment #2, Example #1)
      - ii. If an individual starts a job after the last SAR 7 information has been reported for the family, only two consecutive weeks of hours of participation may be used, even if the hours of participation cross months. These hours are converted to monthly hours by multiplying the total hours for the two-week period by 2.17 and dividing that amount by 4.33. (See Attachment # 2, Example #2)
  - 3. If after pursuing the steps above, the actual hours cannot be determined, or are not available for hours of employment, and the monthly salary and hourly wage are available, the ESW may divide the salary by the hourly wage to determine the number of hours per month worked. This monthly number of hours is then divided by 4.33 and then rounded to the nearest whole number to determine the average number of hours per week of participation.
  - 4. Net self-employment income is determined by offsetting monthly business expenses, evidenced by receipts submitted by the participant, against monthly gross income from self-employment. (Participant may choose actual or 40% deduction for expenses).
    - a. The number of countable hours is determined by dividing the net self-employment income by the federal minimum wage; divide by 4.33, then round to the nearest whole number.
  - 5. Participants who are paid via in-kind; commission only; per-unit; or paid via cash, without a paystub, are still required to report actual hours of employment. If actual hours of employment are not attainable from the employer, the participant shall document the actual hours, and the ESW will verify the actual hours.
    - a. If the amount of pay as well as the hourly wage is known, the hours reported by the participant can be verified by the ESW by comparing the information to determine if the hours appear to be reasonable.
    - b. The ESW may need to interview the participant to determine that hours are accurate and that participant is unable to obtain proof
- B. Community Service & Work Experience
- 1. Hours of participation are verified on the SSSD 3000 – Monthly Participant Timecard, signed by the site supervisor

2. If the calculated number of community service and/or unpaid work experience hours falls short of the family's core hourly requirement but is equal to or greater than the calculated hours, the family will be deemed to have met the core hourly requirement.
    - a. Deeming of hours does not apply to work-eligible individuals who are not a member of the AU (sanctioned, etc)
  3. When a participant is not going through NCHHSA for work experience, community service and work experience participation hours are reported on the SSSD 3000 – Monthly Participant Timecard signed by the site supervisor.
- C. Job Search & Job Readiness
1. Individual Job Search will be verified by the participant turning in the SSSD 3007 – Job Search Log weekly.
    - a. The participant completes individual job search and completes the SSSD 3007 with appropriate information.
    - b. The participant turns in his/her weekly log to their ESW on the Monday following the week of completion. (For example, a log for the week of Monday the 1st through Friday the 5th will be turned in on Monday the 8th).
  2. Workshops will be verified using workshop sign in sheets.
- D. Substance Abuse, Mental Health, and Domestic Violence
1. If the participant is attending a program through Alcohol and Drug Services (ADS), hours of participation are verified by using hours reported on the attendance sheet received weekly.
  2. Participants attending Narcotics Anonymous (NA)/Alcoholics Anonymous (AA) shall verify his/her participation hours by submitting a SSSD 3000 – Monthly Participant Timecard signed by the meeting leader.
    - a. This can also be accomplished by receiving a statement with signature and date from the meeting leader stating the participant was in attendance and the amount of time of the meeting.
  3. Hours spent in Mental Health or Substance Abuse Counseling sessions or Domestic Violence group sessions shall be verified by the participant completing an SSSD 3000 - Time and Attendance worksheet and having it signed by the counselor.
    - a. This can also be accomplished by receiving a statement with signature and date from his/her counselor stating the participant was in attendance and the amount of time of the meeting.
- E. Learning Disabilities Evaluation
1. Hours or participation in the Learning Disabilities (LD) evaluation are verified by the weekly report sent by the LD evaluation provider showing who attended and who did not attend.
    - a. Hours are counted as:
      - 1) Achievement Testing = 2 hours
      - 2) Cognitive Testing = 2 hours
      - 3) Results Appointment = 1 hour
- F. Vocational Education and Job Skills Training Directly Related to Employment
1. Participant will submit an SSSD 3000 – Monthly Participant Timecard to track all reported class time for the month.
  2. ESW will verify the SSSD 3000 with proof that the participant was enrolled in all the classes for which hours were reported and that the hours of reported class time for the month correspond to the individual's class schedule. ESW will then sign the SSSD 3000 verifying that the information matches.

#### G. Satisfactory School Attendance

1. Hours of participation are verified by using report cards, attendance records, and/or similar documentation made available by the service provider
2. Participants must make good or satisfactory progress as determined by the ESW. Attendance, academic performance and completion timeframes may be included in the criteria for good or satisfactory progress.
  - a. If a participant is not making good or satisfactory progress but is regularly attending, up to two (2) months of participation may be counted for such individual while the ESW works with the participant to improve his/her participation and progress.
    - 1) A statement documenting this decision must be included in the C-IV Journal.
  - b. Although satisfactory progress is determined by the ESW, general guidance is provided for data reporting during summer vacation. Satisfactory progress and participation may count, regardless of the number of hours of participation, if the participant:
    - 1) Did not complete the basic education program requirements, **and**
    - 2) Is enrolled or intends to enroll as a full-time student after the school vacation.
3. Satisfactory progress is monitored monthly by the ESW and the documentation is verified and maintained in the participant's case file.

#### H. Education Directly Related to Employment

1. Participants must make good or satisfactory progress as determined by the ESW. Attendance, academic performance and completion timeframes may be included in the criteria for good or satisfactory progress.
  - a. If a participant is not making good or satisfactory progress but is regularly attending, up to two (2) months of participation may be counted for such individual while the ESW works with the participant to improve his/her participation and progress.
    - 1) A statement documenting this decision must be included in the C-IV Journal.
2. Satisfactory progress is monitored monthly by the ESW and the documentation is verified and maintained in the participant's case file.

#### V. Excused Absences

- A. Each recipient engaged in **unpaid** work activities is allowed ten (10) state holidays as an excused absence.
  1. The excused holidays include:
    - a. New Year's Day
    - b. Martin Luther King Jr. Day
    - c. President's Day (Washington's Birthday)
    - d. Memorial Day
    - e. Independence Day
    - f. Labor Day
    - g. Veteran's Day
    - h. Thanksgiving Day
    - i. Day after Thanksgiving
    - j. Christmas Day
  2. The maximum number of hours of combined excused absences and holidays in any given month, for each work-eligible individual, is sixteen (16) hours per month. A maximum of

eighty (80) hours are allowed in the preceding 12-month period. Additional excused absences are only allowed for:

- a. Semester breaks
  - b. Planned work shutdowns
  - c. School appointments
  - d. Medical appointments for self or dependants
  - e. Caseworker appointments
  - f. Child care breakdown
  - g. Illness of self or child
  - h. Family problems including domestic violence issues
  - i. Housing issues
  - j. Transportation breakdown
  - k. Any other similar problems
- B. In order to count an excused absence as actual countable hours of participation, the individual must have been scheduled to participate in a countable work activity for the period of the absence that is reported as participation.
- C. All excused absences must be documented and verified in C-IV.
- D. Excused absences are tracked in C-IV on the Excused Absence List Page.
1. Global Bar = Empl. Services / Local Bar = Activities / Task Bar = Excused Absences.

## **VI. Obtaining Hours**

- A. The ESW completes the back of all WTW2 – Activity Agreements requesting documentation of hours by the 5th day of every month.
- B. If participants have not provided their documentation by the 10th of the month, the ESW attempts to contact the participant via phone call, work-site visit, in office visit, or home visit between the 10th and the 20th of the month to obtain verification.
1. One (1) personal contact or a minimum of two (2) attempted contacts must be completed.
- C. If participants do not provide documentation of their hours by the 20th of the month the ESW will review for satisfactory progress in the activity.
1. Satisfactory progress determination must be documented in the C-IV Journal.
- D. On discontinued cases, the ESW shall make contact with the participant to obtain hours through the month in which the participant was active. A minimum of one (1) personal contact or two (2) attempted contacts must be made.
- E. A WTW sanction may not be entered solely because the participant failed to submit documentation of his/her hours.
- F. A WTW non-compliance action will be initiated if the ESW determines the participant is not making satisfactory progress.
- G. Supportive services may only be discontinued once a determination of no satisfactory progress is made or non-compliance has started.

## **REFERENCES:**

[ACL 07-03](#) – Federal Reauthorization of TANF

[ACL 07-05](#) – TANF WPR Data Reporting  
[ACL 08-07](#) – Transmittal of California’s Work Verification Plan for TANF  
[ACL 08-08](#) – TANF WPR Data Reporting  
[ACL 09-07](#) – TANF WPR Data Reporting  
[ACL 11-20E](#) – TANF WPR Data Reporting for FFY 2011  
[ACL 12-16](#) – TANF WPR Data Reporting for FFY 2012  
 ACL 13-14 – TANF WPR Data Reporting for FFY 2013  
[ACL 14-27](#) – TANF WPR Data Reporting for FFY 2014  
[ACL 14-51](#) – TANF WPR Data Reporting for FFY 2015  
[ACL 14-51E](#) – Correction to ACL 14-51  
[ACL 14-80](#) – Changes to CW Hourly Work Participation Requirement Determinations  
[ACL 15-64](#) – Update to the TANF Work Verification Plan  
[ACL 16-06](#) – TANF WPR Data Reporting for FFY 2016  
[ACL 17-08](#) – TANF WPR Data Reporting for FFY 2017  
 C-IV Job Aid – Work Eligible Individuals - Clarification  
 Federal Regulations 45 Parts 260-263 and 265  
 Satisfactory Progress in WTW Procedure

**FORMS**

SSSD 3000 – Monthly Participant Timecard  
 SSSD 3007 – Job Search Log

**CONTACT PERSON(S):**

Shanna Gardner, Staff Services Analyst

**END OF PROCEDURE**

**REVISION HISTORY:**

Revision	Date	Description of Change	Requested By
0.0	02-08-08	Initial Release	S. Gardner, SSA
0.1	08-10-09	Includes changes from revised WVP effective October 1, 2008. ACL 09-07	S. Gardner, SSA
1.0	06-18-12	Biennial Review. Updated to reflect input in C-IV and to include ACL 11-20E and ACL 12-16 (Projection of Hours, InKind Income, etc.). Included Attachment #2. Included use of form SSSD 3006.	S. Gardner, SSA
2.0	08-23-17	Biennial Review. Included ACL 17-08	S. Gardner, SSA

### Projection of Hours and Cross Over Hours

In accordance with ACF guidance hours of participation in unsubsidized employment will be projected based on current, documented and verified actual hours. This information will be obtained using pay stubs and/or information reported through the initial application, annual renewal, voluntary reports and/or other data sources, such as employer reports and time and attendance records. Recipient eligibility and benefits for the reporting period are based on information provided on the eligibility forms. Evidence must be submitted with the eligibility forms to verify the reported information. If an individual reports hours of employment during the eligibility process, those hours will be projected as participation for six months respectively. Weekly hours of participation are determined by dividing the total monthly hours by 4.33 (the average number of weeks per month).

For new hires when an employer specifies a set number of hours per week which are not subject to variation as a condition of employment, the CWD will use employer documentation as the basis of the initial projection and will subsequently obtain documentation of actual hours worked at the next SAR 7 report or annual renewal. In all other situations, the initial projection is based on at least **one full pay cycle** of documented actual hours of work. This estimate will also take into account the actual hours that can be reasonably expected based on verification of the participant's current, past and expected circumstances. The CWD determines if this estimate is reasonable by looking at paystubs, data in the case file, other documents, statements and other verification.

At the end of the six-month period, during the SAR 7 process or annual renewal, the CWD will obtain new valid documentation of any changes or re-verify the participant's current, actual average hours before it projects these hours for another six-month period.

For both the TANF and SSP-MOE programs, if an individual reports a change in work hours anytime during the projection period, the average weekly projected hours will be recalculated for purposes of participation.

Below are the methods CWDs use to estimate projected actual hours of employment:

**Anticipated Monthly Hours:** The CWD estimates the actual number of employment hours the participant is expected to work in the month and divides that amount by 4.33 weeks to determine the average weekly hours of employment. This method is used for the first month of TANF or SSP-MOE. After the initial TANF or SSP-MOE month, the CWD may average hours of employment for the remaining months of the six-month period.

**Averaging Hours:** If the recipient is paid weekly or every other week, the CWD uses **at least one full pay cycle** of documented and verified hours to convert this to a monthly amount and divides that amount by 4.33 weeks to determine the average weekly hours of employment.

If the parent is paid:

- Weekly, the CWD multiplies the hours by 4.33.
- Every other week, the CWD multiplies the hours by 2.17.
- Other than weekly or every other week, or for hours on a pay stub that crosses between

months, the CWD estimates weekly employment hours based on adding the total expected hours of employment for a period of time, dividing by the number of months in the time period and dividing by 4.33 weeks.

For newly established self-employed individuals, estimates of actual hours are made in a similar fashion to the “Averaging Hours” description above, but use the actual reported income and expenses reported by the individual at the time of eligibility determination.

For the SSP-MOE program, hours of participation in unsubsidized employment will be projected based on information provided on the SAR 7 or other eligibility forms similar to the TANF program projection. A projection may also be made for up to six months using documented actual hours from the recipient’s full pay cycle, i.e. weekly, bi-weekly, monthly based on Washington’s WVP.

### **Projecting and Cross-Over Hours**

If an individual reports hours of employment during the eligibility process, those hours will be projected as participation for six months respectively. Weekly hours of participation are determined by dividing the total monthly hours by 4.33 (the average number of weeks per month).

At the end of the six-month period, during the SAR 7 process or annual renewal, the CWD will obtain new valid documentation of any changes or re-verify the participant’s current, actual average hours before it projects these hours for another six-month period.

For both the TANF and SSP-MOE programs, if an individual reports a change in work hours anytime during the projection period, the average weekly projected hours will be recalculated for purposes of participation.

Below are the methods CWDs use to estimate projected actual hours of employment:

Calculate anticipated monthly hours by estimating the actual number of employment hours in the month and divide by 4.33 to determine the average weekly hours of employment. This method is used for the first month of TANF or SSP-MOE. After the initial TANF or SSP-MOE month, the CWD will average hours of employment for the remaining months of the six-month period. To average hours, use at least one full pay cycle of documented, verified hours, convert to monthly hours and divide by 4.33 to determine weekly hours.

Determine the participant’s pay cycle. If a participant is paid:

- Weekly their pay cycle is weekly and hours should be calculated using at least a week of hours.
  - # of hours in pay cycle \* 4.33/4.33 = weekly hours
- Every-other-week, every two weeks, they have a two-week pay cycle and hours should be calculated using at least two consecutive weeks of hours
  - # of hours in pay cycle \* 2.17/4.33 = weekly hours
- They have a semi-monthly pay cycle and hours should be calculated using at least two pay cycles

- # of hours in pay cycle \* 2.17/4.33 = weekly hours
- Monthly, every 30 days, their pay cycle is monthly and hours should be calculated using at least a month of hours
  - # of hours in pay cycle /4.33 = weekly hours

If pay cycle hours cross into multiple months, the CWD must accurately determine the actual hours worked in the single calendar month. Hours that cross over into previous or following months can be used, but if the CWD knows the participant didn't work those hours in the report month, do not use them. It is up to the CWD to determine when cross over hours can or cannot be used.

**NOTE: When documentation that supports reported hours includes hours for more than one month or if it is not clear how the hours were calculated, include in the narrative, case comments and/or survey what days, hours and/or earnings statements were used for the calculation.**

Below are examples for projecting Unsubsidized Employment hours when you do not have actual hours for a review month.

**Weekly Pay Cycle**

**Example #1**

Sample month is June 2014. Case file contains one earnings statement. Caseworker knows that the participant is paid weekly and has continued working since this earnings statement.

Period Beginning 04/29/2014  
 Period Ending 05/05/2014  
 Regular Hours: 32

$32 * 4.33 = 138.56 / 4.33 = 32$  weekly hours

**Example #2**

Sample month is March 2014. Case file contains three earnings statements. Caseworker knows that the participant is paid weekly and has continued working since the last earnings statement.

Period Beginning 01/14/2014	Period Beginning 01/21/2014	Period Beginning 01/28/2014
Period Ending 01/20/2014	Period Ending 01/27/2014	Period Ending 02/03/2014
Regular Hours: 32	Regular Hours: 30	Regular Hours: 32

Hours can be calculated one of two ways:

Most recent earnings statement -  $32 * 4.33 = 138.56 / 4.33 = 32$  weekly hours

Two most recent earnings statements –  $62 * 2.17 = 134.54 / 4.33 = 31.07$  or 31 weekly hours

## Semimonthly Payroll Cycle

### **Example #1**

Sample month is June 2014. Case file contains two earnings statements. Caseworker knows that the participant is paid on the 7<sup>th</sup> and 22<sup>nd</sup> and has continued working the entire month

Period Beginning 05/23/2014

Period Ending 06/7/2014

Regular Hours: 72

2<sup>nd</sup> Period Beginning 06/8/2014

2<sup>nd</sup> Period Ending 06/22/2014

Regular Hours each period: 68

$72 + 68 = 140 / 4.33 = 32.33$  or 32 weekly hours

## Two-Week Pay Cycle

### Example #1

Sample month is June 2014. Case file contains one earnings statement. Caseworker knows that the participant is paid every other week and has continued working since this earnings statement.

Period Beginning 04/19/2014

Period Ending 05/02/2014

Regular Hours: 64

$64 * 2.17 = 138.88 / 4.33 = 32.07$  or 32 weekly hours

### Example #2

Sample Month is June 2014. Case file contains two earnings statements. Caseworker knows that the participant is paid every two weeks and has continued working since these earnings statements.

Period Beginning 04/05/2014    Period Beginning 04/19/2014

Period Ending 04/18/2014    Period Ending 05/02/2014

Regular Hours: 60                      Regular Hours: 64

Hours can be calculated one of two ways:

Most recent earnings statement -  $64 * 2.17 = 138.88 / 4.33 = 32.07$  or 32 weekly hours

Two most recent earnings statements -  $124/4.33 = 28.63$  or 29 weekly hours

### **Example #3**

Sample month is March 2014. Case file contains three earnings statements. Caseworker knows that the participant works Monday thru Friday, is paid every other Saturday and has continued working since the last earnings statement.

Period Beginning 01/12/2014	Period Beginning 01/26/2014	Period Beginning 02/09/2014
Period Ending 01/23/2014	Period Ending 02/06/2014	Period Ending 02/20/2014
Regular Hours: 32	Regular Hours: 30	Regular Hours: 32

Do not use all three earnings statements because total hours are more than one month. Hours can be calculated one of two ways:

Most recent earnings statement -  $32 * 2.17 = 69.44/4.33 = 16.03$  or 16 weekly hours

Two most recent earnings statement -  $62/4.33 = 14.32$  or 14 weekly hours

### **Example #4 - Multiple Employers with Different Pay Frequency**

Sample month is March 2015. Case file contains three earning statements from two different jobs that the participant submitted during the annual recertification interview in mid-January 2015. Caseworker knows that the participant continued working since the last earning statement.

<u>Job #1: Weekly</u>	<u>Job #2: Bi-weekly</u>
Period Beginning 01/01/2015	Period Beginning 12/29/2014
Period Ending 01/07/2015	Period Ending 01/11/2015
Regular Hours: 14.50	Regular Hours: 51.75

#### Method A, rounding once

Job #1:  $14.50 * 4.33 = 62.78$  per month and Job #2:  $51.75 * 2.17 = 112.30$  per month then adding the total worked hours in the month and divided by 4.33. So,  $175.08 / 4.33 = 40.43$ , rounded to 40.

### **Monthly Pay Cycle**

#### **Example**

Sample month is July 2014. Case file contains one earnings statement. Caseworker knows that the participant is paid monthly and has continued working since the last earnings statement.

Period Beginning 04/01/2014

Period Ending 04/30/2014

Regular Hours: 120

$120/4.33 = 27.71$  or 28 weekly hours

If you have more than one month of hours, add the hours for all months, divide the total number of hours by the number of months to determine monthly hours then divide by 4.33 to calculate weekly hours.

**EXAMPLE**

Period Beginning 04/01/2014

Period Ending 04/30/2014

Regular Hours: 120

2<sup>nd</sup> Period Beginning 05/01/2014

2<sup>nd</sup> Period Ending 05/30/2014

Regular Hours: 140

$260/2 = 130/4.33 = 30.02$  or 30 weekly hours

Suggestion:

Since this new WVP has built-in flexibilities, maybe when the pay stubs crossed-over between two months and the worked hours varied as indicated below, this method would be most advantageous to the counties.

Sample month is February 2015. Caseworker knows that the participant has continued working since the last earnings statement.

Period Beginning 12/12/2014

Period Ending 12/25/2014

Regular Hours: 69.50

Period Beginning 12/26/2014

Period Ending 01/08/2015

Regular Hours: 64.75

Period Beginning 01/09/2015

Period Ending 01/22/2015

Regular Hours: 58.75

Applying the other previous methods would result in lesser weekly hours, i.e. when used the most recent two stubs,  $64.75 + 58.75 = 123.50/4.33 = 28.53$ , rounded to 28 or when using the most recent stub,  $58.75 * 2.17 = 127.49/4.33 = 29.44$ , rounded to 29; then we would use this last approach.

Add all the hours from the two crossed-over months:  $69.50 + 64.75 + 58.75 = 193.00$  divided by one and half months, equals 128.67 hours per month divided by 4.33 equals 29.71, rounded to 30 weekly hours.

**Example #1** – SAR 7 report month for February is submitted to the county in March and contains 100 actual hours of participation for the income received in February. The case has been pulled in the May sample and no additional hours of participation have been reported for any individual in the family. The SAR 7 hours (100 hours) can be used to project hours for May.  $100 \text{ hours} \div 4.33 = 23$  (rounded) hours per week of participation.

In March, if the hours of participation increase to 120 hours, the projected hours that were reported for May must be recalculated.  $120 \div 4.33 = 28$  (rounded) hours of participation for May. These hours must be documented and verified, and all documentation and verifications must be maintained in the case file.

**Example #2** – Hours of participation are submitted to the county in March. The most recent pay stub reflects hours of participation for two consecutive weeks of pay (50 hours); one week in February (24 hours), and one week in March (26 hours). These hours may be used to project hours for the month of March (the sample month) as well as April and May if no additional hourly information is available. The actual hours for the two consecutive weeks (50 hours) are multiplied by 2.17 and the product is divided by 4.22 to determine the average weekly hours of employment for the month; round the final results to the nearest whole number.  $50 \text{ hours} \times 2.17 = 108.5$ ,  $108.5 \div 4.22 = 25.7$ , rounded to 26 hours per week.  $26 \text{ hours} \div 4.33 = 6$  (rounded) hours per week of participation.