

# TANF Work Verification Plan

October 4, 2021 Amendment

Employment First is the name of Nebraska’s welfare reform program. The primary purpose of Employment First is to provide temporary, transitional support for Nebraska families so that economic self-sufficiency is attained in as expeditious a manner as possible through the provision of training, education, and employment preparation. Nebraska is dedicated to improving the standard of living and quality of life for each family living in the State that has had to turn to public assistance to help support their family in times of need. The Department of Health and Human Services, Division of Children and Family Services (CFS) will accomplish this by promoting personal responsibility and empowering parents to support their families.

## I. Countable Work Activities

<b>Work Activity: Unsubsidized Employment – 1 of 2</b>			
Description	Countable Hours	Verification of Hours	Daily Supervision
<p>Unsubsidized employment may be full- or part-time employment in the public or private sector and is not subsidized by TANF or any other public program.</p> <p>Employment must consist of work for pay at either the Federal or State minimum wage, whichever is higher.</p> <p>This activity includes those individuals involved in paid Apprenticeships as well as individuals who are considered self-employed (Microbusiness Enterprise (MBE)).</p>	<p>Hours counted are determined by the same processes utilized to verify hours.</p>	<p>Hours are determined based on verified employment hours from pay stubs, information from the Work Number (and other online verification sources), a written employer statement, or a telephone call to the employer. An average of those hours is used to project participation for up to six (6) months. Any changes known to the agency within those six (6) months are acted upon at the time of change.</p> <p>Case management staff project hours of employment by the following calculation:</p> <ol style="list-style-type: none"> <li>1) Number of hours working per week ÷ five (5) working days per week = hours working per day</li> <li>2) Hours working per day x total number of working days in the month = participation for the month</li> </ol> <p>Unless employment verification indicates otherwise, case management staff assumes the participant works five (5) days a week.</p>	<p>Daily supervision to be provided by the participant’s employer.</p>

**Work Activity: Unsubsidized Employment – 2 of 2**

Description	Countable Hours	Verification of Hours	Daily Supervision
(Previous Page)	(Previous Page)	<p>If an individual is self-employed, CFS determines income for cash assistance eligibility from:</p> <ol style="list-style-type: none"> <li>1) IRS Form 1040 and accompanying schedules, or</li> <li>2) A rolling average of monthly income and expenses is shown on the participant’s self-employment ledgers if no tax forms are filed.</li> </ol> <p>Eligibility for assistance is based on the income calculated by the above method and thus used to determine the amount of cash assistance. To determine hours of participation, case management staff will take the net income, as shown in the assistance budget, and divide it by the State or Federal minimum wage (whichever is higher) to arrive at the number of hours to be credited for monthly participation.</p> <p>Documents used to verify hours, i.e. employer reports or pay stubs, are retained in the participant’s case file.</p>	(Previous Page)

**Work Activity: Work Experience**

Description	Countable Hours	Verification of Hours	Daily Supervision
<p>Work Experience is unpaid work in any public, private, for-profit or nonprofit business, or organization. The purpose of Work Experience is to assist an individual in acquiring the general skills, training, knowledge, and work habits needed to obtain and maintain employment.</p> <p>When developing the placement, the case management staff must consider the participant's:</p> <ul style="list-style-type: none"> <li>• Education and training;</li> <li>• Experience;</li> <li>• Work history;</li> <li>• Job skills;</li> <li>• Vocational interests and goals; and,</li> <li>• Limitations.</li> </ul> <p>Placement requires a written agreement between the Department and the worksite. Such agreement will include:</p> <ul style="list-style-type: none"> <li>• Start and end dates of placement;</li> <li>• Weekly scheduled activities; and,</li> <li>• Skill(s) the participant will acquire.</li> </ul> <p>Placement must be reviewed regularly but must not exceed six (6) months.</p>	<p>Hours counted are based on the actual hours of work experience performed by the participant.</p> <p>Per Section 520.201 of the Fair Labor Standards Act (FLSA), Nebraska considers participants in our Work Experience Program to be “learners” who are being trained for an occupation, and therefore, they are not subject to the requirements of the FLSA.</p> <p>When calculating hours of participation, case management staff total actual hours of participation on daily or weekly verification documents. At the end of each month the hours from all applicable verifications, by component, are totaled and rounding of hours is allowed at that time.</p>	<p>Actual hours of participation are determined by submission of weekly time sheets (Attachment A), signed by the Work Experience site supervisor and the participant.</p> <p>Time sheets are retained in the participant's case file.</p>	<p>Daily supervision will be performed by the Work Experience site supervisor, Employment First Case Manager, or contract provider.</p>

**Work Activity: On-the-Job Training**

Description	Countable Hours	Verification of Hours	Daily Supervision
<p>On-the-Job Training (OJT) is training in the public or private sector that is given to a paid employee. A participant must be assessed as job-ready prior to placement.</p> <p>The intent of OJT is to provide the participant with the knowledge and skills needed for full performance of that job.</p> <p>It does require a written agreement between the Department and employer. The agreement assures that the participant:</p> <ul style="list-style-type: none"> <li>• Is hired by the employer for full-time work;</li> <li>• Is provided training needed for full job performance;</li> <li>• Receives wages and benefits comparable to other employees; and,</li> <li>• Is retained as a regular employee after successful completion of the OJT.</li> </ul> <p>The agreement <u>must</u> include an outline of the training to be provided to the participant.</p> <p>The employer will be reimbursed up to 50% of the hourly wage for actual hours worked in a set period of time, not to exceed six (6) months.</p> <p>OJT may include classroom training when the participant is paid for the hours.</p>	<p>Hours counted are determined by the same processes utilized to verify hours.</p>	<p>Hours are determined based on verified employment hours from pay stubs, information from the Work Number (and other online verification sources), a written employer statement, or a telephone call to the employer. An average of those hours is used to project participation for up to six (6) months. Any changes known to the agency within those six (6) months are acted upon at the time of change.</p> <p>Case management staff project hours of employment by the following calculation:</p> <ol style="list-style-type: none"> <li>1) Number of hours working per week ÷ five (5) working days per week = hours working per day</li> <li>2) Hours working per day × total number of working days in the month = participation for the month</li> </ol> <p>Unless employment verification indicates otherwise, case management staff assumes the participant works five (5) days a week.</p>	<p>Daily supervision to be provided by the participant's employer.</p>

**Work Activity: Job Search and Job Readiness – 1 of 3**

Description	Countable Hours	Verification of Hours	Daily Supervision
<p>Job Search is actively seeking or obtaining employment. It includes workshop activities that provide skills in job search, interviewing, workplace expectations, resume writing, as well as actual job searching.</p> <p>Job Readiness activities prepare an individual to seek and obtain employment. Activities may include training in life skills or short-term substance and mental health treatment or rehabilitation activities for those individuals who are considered to be otherwise employable.</p> <p>Participants will be assessed to determine if they are “otherwise employable” prior to allowing outpatient substance abuse or mental health treatment. The need for such treatment will be based on documentation from a licensed medical or mental health professional.</p>	<p>Job Search hours are based on actual verified hours attended in a structured job search setting as well as verified contact with potential employers. Case management staff will allow the actual hours of contact with employers for job applications and interviews, as well as time spent traveling between job contacts. Job Readiness hours are based on actual verified hours attending life skills workshops, substance or mental health treatment programs.</p> <p>An individual may not participate in Job Search/Job Readiness (JS/JR) activities for more than four (4) consecutive weeks or a total of 240/360 hours in the preceding 12-month period. The 12-month period begins with the first month in which the participant uses hours of JS/JR.</p> <p>Instructions to staff follow.</p>	<p>Participants are required to make daily contact with their Case Manager or contract provider. They will maintain a job contact sheet (Attachment A) which will be provided to their Case Manager each week. This job contact sheet includes an area to indicate the amount of time spent on each contact. All job contact sheets are reviewed for completeness and no credit is given for contacts where information is not complete. Case management staff review 25% of the job contacts for participants involved in independent job search.</p>	<p>Daily supervision will be provided by the Employment First Case Manager or contract provider.</p> <hr/> <p align="center">Qualifying for 12 Weeks</p> <p>Due to Supplemental Nutrition Assistance Program (SNAP) participation, Nebraska has met the qualification for 12 weeks of Job Search during all of Federal Fiscal Year (FFY) 2009, as well as October through January of FFY 2010. CFS reviews the chart on the Office of Family Assistance (OFA) website each month. If there is a month where CFS does not qualify for the additional six (6) weeks of JS/JR, per TANF-ACF-PI-2006-04, an amended report will be submitted to adjust the work participation data.</p>

**Work Activity: Job Search and Job Readiness – 2 of 3**

<b>Four Consecutive Weeks</b>	<b>Hourly Equivalent for 12 Weeks</b>
<p>A participant’s hours of JS/JR are countable for only four (4) consecutive weeks. Following a break of at least one (1) week, the participant may be allowed JS/JR hours for another four (4) consecutive weeks until their total hourly limit for the year is met. Even one (1) hour of JS/JR in a week uses up one (1) of the four (4) consecutive weeks. The counting of JS/JR weeks will begin when the first month’s hours are counted on a tracking sheet (see Attachment A) and will continue for a 12-month period.</p> <p>If the participant will not meet their monthly participation requirement, these hours are reported as “Other Work Activities” and not tracked on the tracking sheet (see Attachment A).</p> <p>If the individual requires more than four (4) consecutive weeks of JS/JR activities, the result may be that they will not meet participation for a particular month because of non-countable hours during the fifth week. One of the following four (4) methods of accounting for the shortage is allowable:</p> <ul style="list-style-type: none"> <li>• Allow excused absence based on participation in other countable activities, if applicable. The hours of excused absence would count toward the countable work activity.</li> <li>• If the excused absence option is not feasible, the hours of the other countable activities could be increased throughout each week to account for the shortfall.</li> <li>• During the fifth week, the participant could be involved in an additional countable activity for all required hours.</li> <li>• For those approved for Hardship, Good Cause could be granted.</li> </ul>	<p>Rule changes define a week of JS/JR as an accrual, during the preceding 12-month period, of 20 hours for individuals with a child under age six (6) or 30 hours for other participants.</p> <p>The counting of hours/weeks will now begin when the first month’s hours are counted and will continue for a 12-month period.</p> <p>Individuals who are mandatory for 20 hours per week will be allowed 240 total hours in a year before reaching their maximum.</p> <p>Individuals who are mandatory for 30 hours per week will be allowed 360 total hours in a year before reaching their maximum.</p>



**Work Activity: Job Search and Job Readiness – 3 of 3**

Description	Countable Hours	Verification of Hours	Daily Supervision
<p>Specific allowable activities are:</p> <ul style="list-style-type: none"> <li>• Contact with employers to complete job applications, interviews, and follow-up to applications.</li> <li>• Workshop settings that will provide the participant with skills on how to search for a job, prepare a resume, apply for a job, as well as workplace expectations.</li> <li>• Attendance at counseling or treatment appointments for mental health and substance abuse issues.</li> </ul>	<p>When calculating hours of participation, case management staff will total actual hours of participation on daily or weekly verification time sheets. At the end of each month the hours from all applicable verifications, by component, are totaled and rounding of hours is allowed at that time.</p>	<p>Any online and telephone contact with employers must occur at a supervised site with the participant registering at the beginning of their session and checking out of the site when they have completed their contacts. A log of those hours is maintained in the participant’s case file.</p> <p>For hours spent in a structured job search setting or job readiness workshops, participants are required to register at the beginning of each session and check out at the end of the session. A log of those hours is maintained in the participant’s case file.</p>	<p align="center">Assuring 12 Weeks</p> <p>During the process of compiling Work Participation data each month, if an individual is identified as being involved in JS/JR activities, case management staff reviews activities in the previous month to determine if the individual has used four (4) consecutive weeks. Case management staff reviews the preceding 12-month period to determine if the individual has used the maximum number of weeks. If either of these two (2) parameters are met, case management staff reports the hours as “Other Work Activities”.</p> <p>Case management staff will maintain a tracking sheet (Attachment A) for each participant, in their case file, which shows the weeks and hours of Job Search in each 12-month period.</p>

**Work Activity: Community Service Program**

Description	Countable Hours	Verification of Hours	Daily Supervision
<p>Community Service (CS) is unpaid work that directly benefits the community. It must be performed in a structured program with a public or nonprofit organization and must improve the employability of recipients.</p> <p>Worksites may include federal, state, county, local and tribal governments, and colleges, universities, and school districts. CS includes participation in volunteer organizations such as:</p> <ul style="list-style-type: none"> <li>• AmeriCorps;</li> <li>• Volunteers in Service to America (VISTA);</li> <li>• Private volunteer organizations; or</li> <li>• Court-ordered community service.</li> </ul> <p>Examples of service fields may include but are not limited to: health; social service; environmental protection; education; urban and rural redevelopment; welfare; recreation; public facilities; public safety; and child care.</p> <p>Prior to placement, we must consider the participant's:</p> <ul style="list-style-type: none"> <li>• Education and training;</li> <li>• Experience;</li> <li>• Work history;</li> <li>• Job skills;</li> <li>• Vocational interests and goals; and</li> <li>• Limitations.</li> </ul> <p>CS may include short-term training that is of limited duration and is a necessary or regular part of the placement.</p> <p>Nebraska does not allow self-initiated CS. All placements must be coordinated through the Employment First Case Manager and require a written agreement between the Department and worksite.</p>	<p>Hours are determined by adding the Temporary Assistance for Needy Families (TANF) grant amount to the SNAP allotment for the TANF household and dividing that result by the Federal or State Minimum Wage, whichever is higher. Benefits are reviewed monthly and hours of participation adjusted as needed.</p> <p>If the above calculation results in less than 20 hours per week and the participant is participating in their required number of hours, participation will be allowed at the full 20 hours per week.</p> <p>When calculating hours of participation, case management staff total actual hours of participation on daily or weekly verification documents. At the end of each month the hours from all applicable verifications, by component, are totaled and rounding of hours is allowed at that time.</p>	<p>Actual hours of participation are determined by the submission of weekly time sheets (Attachment A), signed by the CS site supervisor and the participant.</p> <p>Verification of AmeriCorps or court-ordered community service hours are provided by the person supervising such activity.</p> <p>Time sheets are retained in the participant's case file.</p>	<p>Daily supervision is provided by staff at the CS site, the Employment First Case Manager, or the contract provider.</p>



**Work Activity: Vocational Training – 1 of 3**

Description	Countable Hours	Verification of Hours	Daily Supervision
<p>Vocational Training is an organized program that is directly related to preparing a participant for work in current or emerging occupations. Programs include:</p> <ul style="list-style-type: none"> <li>• Associate Degree Programs;</li> <li>• Certificate programs based on credits accumulated at an institution;</li> <li>• Certificate programs developed by industries to teach specific skills;</li> <li>• Specific skill related programs of a non-degree nature; or</li> <li>• Bachelor Degree Programs.</li> </ul>	<p>Hours are determined based on class times indicated on the class schedule from the educational program.</p> <p>One (1) hour of unsupervised study time per hour of class time will be countable with verification from the educational program.</p> <p>Supervised study time is allowed as participation when it is supervised by:</p> <ul style="list-style-type: none"> <li>• An Employment First Case Manager or contract provider;</li> <li>• The training program; or</li> <li>• A monitored community site.</li> </ul>	<p>Verification of hours will begin with a class schedule. Hours are verified by an attendance record signed by a representative of the educational entity and the participant on a weekly basis.</p> <p>A statement from the educational institution will verify the amount of unsupervised study time required for a particular class.</p> <p>Attendance sheets, signed by a monitor at the supervised study site and the participant are used to verify supervised study time.</p>	<p>Daily supervision is provided by a representative of the entity providing the instruction or the monitor at the supervised study site.</p> <hr/> <p align="center">Assuring 12 Months</p> <p>During the process of compiling data for the ACF-199, case management staff will “look back” at each month of eligibility to determine if the participant has used the maximum number of Vocational Training months. If the individual has participated in this activity for more than 12 months, hours of participation are reported as “Job Skills Training”.</p> <p>Case management staff will maintain a tracking sheet (Attachment A) for each individual, which shows the months of Vocational Training used by each participant.</p> <p>Case management staff will also be checking the number of cases within educational activities to be certain we do not exceed the 30% maximum.</p>
<p align="center">ABE, ESL</p> <p>Vocational Training includes ABE and ESL <b>only</b> when the training is required as part of the above-mentioned acceptable Vocational Training programs when the educational institution determines, through testing, the training is necessary as an essential part of the Vocational Training program.</p>	<p>This activity has a Federal lifetime limit of 12 months per participant.</p> <p>Nebraska adopted a 36-month limit for Vocational Training activities. CFS acknowledges any months beyond the 12-month Federal lifetime limit will not count toward Nebraska’s Federal Work Participation Rate.</p>		

**Work Activity: Vocational Training – 2 of 3**

Description	Countable Hours	Verification of Hours	Daily Supervision (Previous Page)
<p>Distance and online course work will be allowed when the training program includes mechanisms for providing reports that document the actual time the participant is accessing the online training program or the online training is conducted in a supervised setting.</p>	<p>When calculating hours of participation, case management staff total actual hours of participation on daily or weekly verification documents. At the end of each month the hours from all applicable verifications, by component, are totaled and rounding of hours is allowed at that time.</p>	<p>Involvement in online class time is verified by:</p> <ul style="list-style-type: none"> <li>• Log-in and log-out records available online from the educational institution or in electronic format. Reports of progress, such as course completion, grades, etc. must also be provided.</li> <li>• If log-in and log-out records are not available, the class time must occur in a supervised setting with the monitor at the site verifying class time. Reports of progress, such as course completion, grades, etc. must also be provided.</li> </ul> <p>All verifications are retained in the participant's case record.</p>	

**Work Activity: Vocational Training – 3 of 3**

Description	Countable Hours (Previous Page)	Verification of Hours	Daily Supervision (Previous Page)
<p>When an Electronic Tracking System is not available and Attendance Sheets are not attainable for online classes, the Employment First Case Manager can verify weekly hours through documented contact.</p> <p>If satisfactory progress is not attained in a participant's online coursework, this documentation method is no longer allowed. The participant would then be required to verify allowable education hours through either an electronic tracking system or signed attendance sheets by a third-party.</p>		<p>Involvement in online class time will be verified by:</p> <ul style="list-style-type: none"> <li>• Employment First Case Manager must have, at minimum, weekly contact with the participant.</li> <li>• Contact must include their attendance and process in their class(es).</li> <li>• The mid-term and final grades must be submitted to the Employment First Case Manager for each school term to support progress.</li> </ul> <p>All verifications are retained in the participant's case record.</p>	

**Work Activity: Job Skills Training Directly Related to Employment – 1 of 3**

Description	Countable Hours	Verification of Hours	Daily Supervision
<p>Job Skills Training is intended to provide an individual with the job skills required for employment, advancement, or adaptation to changes in the workplace. This training would include:</p> <ul style="list-style-type: none"> <li>• Associate Degree Programs;</li> <li>• Certificate programs based on credits accumulated at an institution;</li> <li>• Certificate programs developed by industries to teach specific skills;</li> <li>• Specific skill related programs of a non-degree nature; or</li> <li>• ABE or ESL classwork.</li> </ul>	<p>Hours are determined based on class times indicated on the class schedule from the educational program.</p> <p>One (1) hour of unsupervised study time per hour of class time will be countable with verification from the educational program.</p> <p>Supervised study time is allowed as participation when it is supervised by:</p> <ul style="list-style-type: none"> <li>• An Employment First Case Manager or contract provider;</li> <li>• The training program; or</li> <li>• A community site that is monitored.</li> </ul> <p>Because of the lifetime limit, when an individual is participating in Vocational Training, and they do not meet full participation hours for a month, the hours involved should be reported as Job Skills Training Directly Related to Employment.</p>	<p>Verification of hours will begin with a class schedule. Hours are verified by an attendance record signed by a representative of the educational entity and the participant on a weekly basis.</p> <p>A statement from the educational institution will verify the amount of unsupervised study time required for a particular class.</p> <p>Attendance sheets, signed by a monitor at the supervised site and the participant are used to verify supervised study time.</p> <p>Verifications are retained in the participant’s case record.</p>	<p>Daily supervision will be provided by a representative of the entity providing the instruction or the monitor at the supervised study site.</p>

**Work Activity: Job Skills Training Directly Related to Employment – 2 of 3**

Description	Countable Hours	Verification of Hours	Daily Supervision (Previous Page)
<p>Distance and online course work will be allowed when the training program includes mechanisms for providing reports that document the actual time the participant is accessing the online training program or the online training is conducted in a supervised setting.</p>	<p>When calculating hours of participation, case management staff total actual hours of participation on daily or weekly verification documents. At the end of each month the hours from all applicable verifications, by component, are totaled and rounding of hours is allowed at that time.</p>	<p>Involvement in online class time is verified by:</p> <ul style="list-style-type: none"> <li>• Log-in and log-out records available online from the educational institution or in electronic format. Reports of progress, such as course completion, grades, etc. must also be provided.</li> <li>• If log-in and log-out records are not available, the class time must occur in a supervised setting with the monitor at the site verifying class time. Reports of progress, such as course completion, grades, etc. must also be provided.</li> </ul> <p>All verifications are retained in the participant’s case record.</p>	

**Work Activity: Job Skills Training Directly Related to Employment – 3 of 3**

Description	Countable Hours (Previous Page)	Verification of Hours	Daily Supervision (Previous Page)
<p>When an Electronic Tracking System is not available and Attendance Sheets are not attainable for online classes, the Employment First Case Manager can verify weekly hours through documented contact.</p> <p>If satisfactory progress is not attained in a participant's online coursework, this documentation method is no longer allowed. The participant would then be required to verify allowable education hours through either an electronic tracking system or signed attendance sheets by a third-party.</p>		<p>Involvement in online class time will be verified by:</p> <ul style="list-style-type: none"> <li>• Employment First Case Manager must have, at minimum, weekly contact with the participant.</li> <li>• Contact must include their attendance and process in their class(es).</li> <li>• The mid-term and final grades must be submitted to the Employment First Case Manager for each school term to support progress.</li> </ul> <p>All verifications are retained in the participant's case record.</p>	



**Work Activity: Education Directly Related to Employment – 1 of 2**

Description	Countable Hours	Verification of Hours	Daily Supervision
<p>Education Directly Related to Employment is to provide education related to a specific occupation or job for those individuals who do not have a high school diploma or certificate of equivalency but need education for a specific occupation, job, or job offer. This would include:</p> <ul style="list-style-type: none"> <li>• Certificate programs based on credits accumulated at an institution;</li> <li>• Certificate programs developed by industries to teach specific skills;</li> <li>• Specific skill related programs of a non-degree nature; or</li> <li>• ABE or ESL classwork.</li> </ul> <p>This activity may include GED preparation and testing if needed for employment, ABE, or ESL activities.</p> <p>The participant must be making satisfactory progress, as defined by the educational program, to continue this activity.</p>	<p>Hours are determined based on class times indicated on the class schedule from the educational program.</p> <p>One (1) hour of unsupervised study time per hour of class time will be countable without additional verification.</p> <p>Supervised study time is allowed as participation when it is supervised by:</p> <ul style="list-style-type: none"> <li>• An Employment First Case Manager or contract provider;</li> <li>• The training program; or</li> <li>• A community site that is monitored.</li> </ul> <p>When calculating hours of participation, case management staff total actual hours of participation on daily or weekly verification documents. At the end of each month the hours from all applicable verifications, by component, are totaled and rounding of hours is allowed at that time.</p>	<p>Verification of hours will begin with a class schedule. Hours will be verified by an attendance record signed by a representative of the educational entity and the participant on a weekly basis.</p> <p>Attendance sheets, signed by a monitor at the supervised site and the participant are used to verify supervised study time.</p> <p>Good and satisfactory progress is verified by grade reports at the completion of each session.</p> <p>All verifications are retained in the participant’s case record.</p>	<p>Daily supervision will be provided by a representative of the entity providing the instruction or the monitor at the supervised study site.</p>

**Work Activity: Education Directly Related to Employment – 2 of 2**

Description	Countable Hours (Previous Page)	Verification of Hours	Daily Supervision (Previous Page)
<p>When an Electronic Tracking System is not available and Attendance Sheets are not attainable for online classes, the Employment First Case Manager can verify weekly hours through documented contact.</p> <p>If satisfactory progress is not attained in a participant's online coursework, this documentation method is no longer allowed. The participant would then be required to verify allowable education hours through either an electronic tracking system or signed attendance sheets by a third-party.</p>		<p>Involvement in online class time will be verified by:</p> <ul style="list-style-type: none"> <li>• Employment First Case Manager must have, at minimum, weekly contact with the participant.</li> <li>• Contact must include their attendance and process in their class(es).</li> <li>• The mid-term and final grades must be submitted to the Employment First Case Manager for each school term to support progress.</li> </ul> <p>All verifications are retained in the participant's case record.</p>	

**Work Activity: Satisfactory Attendance at a Secondary School or a Course of Study Leading to a Certificate of General Equivalence**

Description	Countable Hours	Verification of Hours	Daily Supervision
<p>Satisfactory Attendance in a Secondary School or GED program requires progress toward attainment of a diploma or certificate of equivalency.</p> <p>This activity may include GED preparation and testing. It may also include ABE and ESL activities if they are part of the Secondary School or GED program.</p> <p>The participant must be making satisfactory progress, as defined by the educational program, to continue this activity.</p>	<p>Hours are determined based on class times indicated on the class schedule from the educational program.</p> <p>One (1) hour of unsupervised study time per hour of class time will be countable without additional verification.</p> <p>Additional study time is allowed as participation when it is supervised by:</p> <ul style="list-style-type: none"> <li>• An Employment First Case Manager or contract provider,</li> <li>• The training program, or</li> <li>• A community site that is monitored.</li> </ul> <p>When calculating hours of participation, case management staff total actual hours of participation on daily or weekly verification documents. At the end of each month the hours from all applicable verifications, by component, are totaled and rounding of hours is allowed at that time.</p>	<p>Verification of hours will begin with a class schedule. Hours are verified by an attendance record signed by a representative of the educational entity and the participant on a biweekly basis.</p> <p>Attendance sheets, signed by a monitor at the supervised site and the participant are used to verify supervised study time.</p> <p>Good and satisfactory progress is verified by grade reports at the completion of each session.</p> <p>All verifications are retained in the participant's case record.</p>	<p>Daily supervision will be provided by a representative of the school providing the instruction.</p>

**Work Activity: Providing Child Care Services to an Individual Who is Participating in a Community Service Program**

Providing child care services is intended to facilitate the participation of another individual in a Community Service Program. It may be paid or unpaid work.

Nebraska does not currently include Providing Child Care Services to an Individual who is Participating in a Community Service Program as an allowable Work Activity. If a decision is made in the future to include this activity, an amendment to the Work Verification Plan will be submitted.

**Work Activity: Subsidized Employment**

Subsidized Employment is employment for which the employer receives a subsidy from TANF or other public funds to offset some or all of the wages and costs of employing a recipient.

Nebraska does not currently include Subsidized Employment as an allowable Work Activity. If a decision is made in the future to include this activity, an amendment to the Work Verification Plan will be submitted.

## II. Hours Engaged in Work

### Excused Absences

Nebraska will allow the following state holidays:

<b>Holiday</b>	<b>Date</b>	<b>Holiday</b>	<b>Date</b>
New Year's Day	January 1st	Labor Day	First Monday in September
Martin Luther King, Jr. Day	Third Monday in January	Veterans' Day	November 11 <sup>th</sup>
President's Day	Third Monday in February	Thanksgiving Day	Fourth Thursday in November
Memorial Day	Last Monday in May	Day after Thanksgiving	Friday after Thanksgiving
Independence Day	July 4th	Christmas Day	December 25th

In addition, participants will be allowed 80 hours of excused absences during the preceding 12-month period. In order to count as actual hours of participation, the participant must have been scheduled for the specific work activity during that time. No more than 16 hours of excused absences can be used in a one-month period. Reasons for an excused absence will include medical appointments, illness of the participant or immediate family member, death of an immediate family member, required appointments with other service providers, or court dates. Excused Absences will be granted based on a documented medical or personal need for the participant to be absent. If deemed necessary by staff, participants may be required to provide verification of the absence. Excused absences will be tracked by the Employment First Case Manager with a paper tracking system (Attachment A) placed in the participant's case record.

### FLSA Deeming

#### Community Service Program

On September 21, 2006, Nebraska received approval from the Food and Nutrition Service to implement a Mini-Simplified SNAP Program. This approval allows us to use the following formula to determine required hours of participation per month for the Community Service Program:

$$\text{Cash Grant} + \text{SNAP Allotment} \div \text{Federal Minimum Wage} = \text{Hours Allowed Per Month}$$

The benefit amounts will be reviewed each month and the hours allowed adjusted as necessary when benefits change.

#### Work Experience Program

Per Section 520.201 of the FLSA, Nebraska considers participants in our Work Experience Program to be "learners" who are being trained for an occupation, and therefore, they are not subject to the requirements of the FLSA.

### **III. Work-Eligible Individual**

Nebraska excludes the following applicants/recipients from the definition of work-eligible Individuals:

- a) A minor parent who is not a head-of-household.
- b) A non-recipient parent of children receiving TANF/Maintenance of Effort (MOE) who is ineligible to receive assistance due to immigration status.
- c) An individual receiving assistance under an approved Tribal TANF program.
- d) A non-recipient parent of children receiving TANF/MOE who is not receiving TANF benefits due to receipt of Supplemental Security Income (SSI) or Social Security Disability Income (SSDI). Nebraska does not consider disabled parents receiving SSI or SSDI to be 'work-eligible individuals' because they are not included in the TANF payment unit.
- e) A parent needed in the home to care for a disabled family member who is not attending school full-time.\*

\*Nebraska Regulation states: "There must be medical documentation and a signed statement from a licensed medical professional to support the need for the parent to remain in the home to care for the disabled family member. The disability of the family member being cared for must be evaluated at least every six months, depending on the diagnosis and prognosis for recovery, in order to determine if the parent is still needed in the home to provide care for the disabled family member."

Documentation:

- 1) Identifying work-eligible individuals – In the process of gathering data for the ACF-199, CFS will first determine the adult's status in the TANF case. Work-eligible individuals are:
  - a) An adult recipient of cash assistance from TANF or Separate State Program (SSP)-MOE funds.
  - b) A minor parent recipient who is head-of-household
  - c) Non-recipient parents with a reason of:
    - Convicted Drug Felon;
    - Third-Party Medical Sanction;
    - Intentional Program Violation Sanction;
    - Fleeing Felon;
    - Social Security Number Sanction; or,
    - Misrepresenting Residency Sanction.



- 2) Verification of work-eligible status – Through data entry requirements, CFS’ automated eligibility system, N-FOCUS, accurately identifies work-eligible individuals. The categories of work-eligible individuals are identified in N-FOCUS as “Financially Responsible” within the TANF case. Compiling the data for the ACF-199 submission includes reading each case for the relationship between the adult(s) and child(ren) in the TANF case. When there are two (2) adults, each with a parental relationship to the child(ren), it is identified as a two-parent family with corresponding work participation requirements. If there is only one (1) identified adult, or minor parent head-of-household, with a parental relationship to the child(ren) in the case, it will be included in the overall work participation data.
- 3) Accurate Data Assurance – Nebraska has developed tools for use by Case Managers and workers to track and verify the actual hours of participation by work-eligible individuals. These tools are required to be utilized on a statewide basis and are included as an attachment to this plan (Attachment A). N-FOCUS only allows designated staff to enter participation hours for federally defined activities, thereby assuring CFS does not report non-countable activities.

#### **IV. Internal Controls**

Work Verification Procedures – CFS has established a team of Economic Assistance Program Accuracy Specialists as part of the Research, Planning, and Evaluation team that has responsibility for reading a select number of cash assistance cases each month to ensure benefits are accurately determined. In addition, the TANF Program Unit has four (4) designated Program Accuracy Specialists who conduct reviews of Employment First related TANF cases each month. These reviews monitor the actual case accuracy for Assessments, Service Plans, Supportive Services, participation verification, and documentation for each individual.

- 1) The designated TANF Program Accuracy Specialists review an average of 360 cases each month to ensure compliance with TANF Work Verification Procedures and Requirements. Online management reports, based on these reviews, are available to identify program areas where staff need to be provided with additional information. Conducting a random sample of approximately 4,334 TANF cases provides results in which CFS can be 99% confident that the results are within 2% of what would be found if all the state’s 6,632 cases were reviewed. TANF Program Staff review additional cases each month, to ensure they are meeting Nebraska’s expectations and requirements.

A TANF Program Specialist completes a second-level review on 20% of selected TANF Program Accuracy Specialist’s portion of the 360 monthly case reviews.

CFS continues to monitor case activity from the ACF-199 report. When areas of inaccuracy are identified, contact is made with CFS staff. The expectation is the identified cases will be corrected and CFS staff will develop a greater understanding of program and system processes.

Each month a report is generated from N-FOCUS listing Employment First cases where the individual is exempt from participation and the exemption exceeds the maximum number of months allowed by regulation. This report shows cases by Service Area, Office, Supervisor, and Worker and is to be reviewed by case management staff. Staff ensures accuracy of the work activity information by reviewing the monthly Case Activity report and submitting report findings to CFS.

CFS maintains all pertinent findings produced through these internal control processes and they are available for use by ACF and other auditors in their review of Nebraska’s work participation verification system.

2/3) Control for Data & Electronic System Errors – Each case management staff calculate the verified hours of participation and enter that amount in N-FOCUS. These hours are then read during the ACF-199 process and transmitted as Work Participation. The previously described case review processes compare the data in the Employment First case file with the data input into N-FOCUS to verify accuracy of the data. In addition, each month, following the run of data for the ACF-199 report, a listing of cases submitted is generated. This list shows the Work Activity, the number of hours submitted, and the participation status for each adult or minor parent head of household. This report is reviewed on a monthly basis by TANF Program Staff and any inaccurate entry of data is noted at that time.

The monthly Work Participation report from the ACF-199 data is based on the complete caseload.

**V. Verification of Data**

N-FOCUS includes system edits to verify the data input by eligibility staff. Prior to the run of cases for the ACF-199 report, all elements of eligibility are verified. Inconsistencies between two (2) or more data elements result in error listings when the quarterly reports are run, as well as generating a monthly Case Activity Report which lists the inconsistency by the worker and case number. Processes for verification and reporting of data are the same for TANF and SSP cases.

Data Element	Data Validation
Reporting Month	Data for a specific month is compiled based on all TANF or SSP payments made by N-FOCUS for the reporting month.
Stratum	Nebraska has stratified cases based on an approved sampling plan. In addition, N-FOCUS assigns a stratum code to cases based on two-parent, one-parent, and child-only cases.
Case Number	The Case Number is based on the unique identifying number established by N-FOCUS at the time the individual applied for assistance.
Disposition	Because CFS only reports on cases that actually received a TANF or SSP payment in the month, internal controls assure no cases are “listed in error”.

Type of Family for Work Participation	For each TANF/SSP payment case, N-FOCUS determines if there are adults (age 19 & over) in the unit. If there are no adults in the unit, N-FOCUS checks for minors who meet the definition of head of household. If neither of these conditions is met, the case is reported as a Child Only Case. If there is one adult or minor head of household, the case is reported as a single parent. If there are two adults, the case is reported as two-parent.
Amount of SNAP	Based on actual issuance of SNAP benefits for the month as shown in N-FOCUS. If the SNAP case includes individuals who are not part of the TANF/SSP case, N-FOCUS prorates benefits by: $\text{Total SNAP Allotment} \div \text{Number of participants in SNAP Case} \times \text{Number of participants in TANF/SSP payment case.}$
Receives Subsidized Child Care	After identifying those cases that received a TANF/SSP cash assistance payment for the month, N-FOCUS checks to determine if any TANF/SSP unit members received Subsidized Child Care Services.
Amount of TANF/SSP Assistance	After identifying those cases that received a TANF/SSP cash assistance payment for the month, N-FOCUS identifies the actual amount of such payment.
Family Affiliation Code	After identifying those cases that received a TANF/SSP cash assistance payment for the month, N-FOCUS identifies the participants and financially responsible individuals in each payment case. N-FOCUS then checks the age of the participant and their relationship to other members of the case to set the appropriate family affiliation code.
Non-Custodial Parent Indicator	Nebraska does not engage non-custodial parents.
Date of Birth – Adult	After identifying those cases that received a TANF/SSP cash assistance payment for the month, N-FOCUS identifies the actual birth date for each individual, validated through a State Verification Exchange System (SVES) Interface.
Relationship to Head of Household	After identifying those cases that received a TANF/SSP cash assistance payment for the month, N-FOCUS identifies the relationship of each individual in the assistance case to the person who is identified as Head of Household.
Parent with Minor Child	During the determination of eligibility for TANF/SSP cash assistance, N-FOCUS checks the ages of all family members as well as family relationships to verify that a minor child is present in the unit.
Work-Eligible Individual Indicator	After identifying those cases that received a TANF/SSP cash assistance payment for the month, N-FOCUS identifies each adult and/or minor parent head of household. All parents, with a participant role in the cash assistance case, are reported as work-eligible individuals. If parents are ‘financially responsible’ in the assistance unit, the reason for the status is reviewed and all parents with this role are reported as work-eligible with the exception of adults who are ineligible due to immigration status.
Date of Birth – Child	After identifying those cases that received a TANF/SSP cash assistance payment for the month, N-FOCUS identifies the actual birth date for each individual, validated through a SVES Interface.

Specific programming requirements are included as an attachment to this Plan.

Work Participation Status	Procedures
12-month lifetime limit on a single parent with a child less than one year of age	ACF-199 documentation is being updated to 'look back' on parents who are excluded for this reason. Once the 12-month limit is reached, the individual will again be included in the WPR.
Exclusion based on work-eligible individual's refusal to work	Nebraska rules include a full-family sanction for an adult's refusal to participate in work activities. Because the entire case is closed, there is no cash assistance payment to the family, and these households are excluded at the initial level of reporting.
20 hours of participation for a parent or relative with a child under age six	When the Work Participation Status is set for ACF-199 reporting, the age of all children related to the work-eligible individual is determined and the status of adults with children under the age of six is set accordingly.

**This is to certify that the Amended Nebraska TANF Work Verification Plan updated October 2021 includes all the information required by the Regulations at 45 CFR 261.62(b) and accurately reflects the provisions under which Nebraska will be operating effective October 4, 2021.**

(Original Signed)

---

William Varicak, TANF Program Manager

**Nebraska Department of Health and Human Services**  
**Employment First – Weekly Time Sheet**  
*The participant and site supervisor must verify information, sign and date.*

<b>Participant</b> Name: <input style="width:90%;" type="text"/> MC#: <input style="width:90%;" type="text"/>	<b>Site Supervisor</b> Name: <input style="width:90%;" type="text"/> Phone #: <input style="width:90%;" type="text"/> Work Site: <input style="width:90%;" type="text"/>
---	---

Week of:

<input type="radio"/> Community Service <input type="radio"/> Work Experience
--

	Date	Time In	Time Out	*Total Hours
Monday				
Tuesday				
Wednesday				
Thursday				
Friday				
Saturday				
Sunday				
		<b>*Total Hours:</b>		

\*Please round to the nearest quarter hour.

<i>To be completed by Site Supervisor:</i>	
<b>Progress</b>	
Attendance	<input style="width:50px; height:20px;" type="text"/>
Cooperation	<input style="width:50px; height:20px;" type="text"/>
Follows Direction	<input style="width:50px; height:20px;" type="text"/>
Job Knowledge	<input style="width:50px; height:20px;" type="text"/>
<small>Please use the following scale:          S = Satisfactory          N = Needs Improvement          P = Progressing</small>	

<i>Participant Signature</i>	<i>Date</i>
<i>Supervisor Signature</i>	<i>Date</i>

Supervisor Signature indicates the Supervisor has verified the accuracy of the hours worked. The employee will be credited for hours worked, as listed on this time sheet.

**Nebraska Department of Health and Human Services  
Employment First – Daily Job Search Time Sheet**

Workshop Time:

Participant:  MC#:  Date:

Company Name		Company Address		Official Use Only Total Hours
Company Phone		Company Contact		
Position		Action <input type="checkbox"/> A <input type="checkbox"/> R <input type="checkbox"/> I		
Time Spent	<input type="checkbox"/> ½ hour <input type="checkbox"/> 1½ hour	<input type="checkbox"/> 1 hour <input type="checkbox"/> 2 hours	<input type="checkbox"/> Online Contact	App #: <input type="text"/> Monitor Initials: <input type="text"/>

Company Name		Company Address		Official Use Only Total Hours
Company Phone		Company Contact		
Position		Action <input type="checkbox"/> A <input type="checkbox"/> R <input type="checkbox"/> I		
Time Spent	<input type="checkbox"/> ½ hour <input type="checkbox"/> 1½ hour	<input type="checkbox"/> 1 hour <input type="checkbox"/> 2 hours	<input type="checkbox"/> Online Contact	App #: <input type="text"/> Monitor Initials: <input type="text"/>

Company Name		Company Address		Official Use Only Total Hours
Company Phone		Company Contact		
Position		Action <input type="checkbox"/> A <input type="checkbox"/> R <input type="checkbox"/> I		
Time Spent	<input type="checkbox"/> ½ hour <input type="checkbox"/> 1½ hour	<input type="checkbox"/> 1 hour <input type="checkbox"/> 2 hours	<input type="checkbox"/> Online Contact	App #: <input type="text"/> Monitor Initials: <input type="text"/>

Company Name		Company Address		Official Use Only Total Hours
Company Phone		Company Contact		
Position		Action <input type="checkbox"/> A <input type="checkbox"/> R <input type="checkbox"/> I		
Time Spent	<input type="checkbox"/> ½ hour <input type="checkbox"/> 1½ hour	<input type="checkbox"/> 1 hour <input type="checkbox"/> 2 hours	<input type="checkbox"/> Online Contact	App #: <input type="text"/> Monitor Initials: <input type="text"/>

**Total Daily Hours:**

Participant Signature \_\_\_\_\_ Date \_\_\_\_\_

Monitor Signature \_\_\_\_\_ Date \_\_\_\_\_

**Action Taken Key: A = Application Submitted, R = Resume Submitted, I = Interview**



*Nebraska Department of Health and Human Services*  
**Employment First – Education Time Sheet**  
*All data is required to be completed on this time sheet.*

Participant:  MC#:  Week of:

**Class Time**

<i>Date</i>	<i>Start Time</i>	<i>End Time</i>	<i>Hours</i>	<i>Instructor/Monitor Signature</i>
<b>Total Class Hours</b>				
<b>Total Unsupervised Study Time</b>				

**Supervised Study Time**

<i>Date</i>	<i>Start Time</i>	<i>End Time</i>	<i>Hours</i>	<i>Monitor Signature</i>
<b>Total Supervised Study Time</b>				

<b>Total Hours</b>	<input type="text"/>
--------------------	----------------------

\_\_\_\_\_  
Participant Signature

\_\_\_\_\_  
Date

TANF Program

07/2021





Participant: \_\_\_\_\_ SSN: \_\_\_\_\_

ADC Eligibility \_\_\_\_\_ To: \_\_\_\_\_

**Job Search Weeks/Hours**

(Maximum of 4 consecutive weeks/ \_\_\_\_\_ total hours per year.)

\_\_\_\_\_, 2\_\_\_\_ through \_\_\_\_\_, 2\_\_\_\_

Week #/Date	Hours	Week #/Date	Hours	Week #/Date	Hours

**Vocational Training Months**

(Maximum of 12 months in lifetime.)

Month Number	Month & Year	Month Number	Month & Year
1		7	
2		8	
3		9	
4		10	
5		11	
6		12	