

Nebraska Department of Health & Human Services
 TANF Work Verification Plan
 Amendment *June 6, 2017*

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. We will accomplish this by promoting personal responsibility and empowering parents to support their families.

I. Countable Work Activities

Work Activity: Unsubsidized Employment			
<i>Description</i>	<i>Countable Hours</i>	<i>Verification of Hours</i>	<i>Daily Supervision</i>
<p>Unsubsidized employment is full- or part-time employment in the public or private sector. It 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.</p>	<p>Hours counted will be determined by the same processes utilized to verify hours.</p>	<p>Hours will be determined based on verified employment hours from pay stubs, information from the Work Number, a written employer statement, or a telephone call to the employer and use an average of those hours to project participation for up to 6 months. Any changes known to the agency within those 6 months will be acted upon at the time of change.</p> <p>We are projecting hours of employment by:</p> <p>Unless Employment Verification indicates otherwise, we assume the participant works 5 days a week.</p> <p>1. Number of hours working per week ÷ 5 working days per week = hours per day working</p> <p>2. Hours per day working x total number of working days in the month = participation for the month</p>	<p>Daily supervision to be provided by the participant’s employer.</p>

Work Activity: Unsubsidized Employment			
<i>Description</i>	<i>Countable Hours</i>	<i>Verification of Hours</i>	<i>Daily Supervision</i>
		<p>If an individual is self-employed, we determine income for cash assistance eligibility from:</p> <ol style="list-style-type: none"> 1) IRS Form 1040 and accompanying schedules, or 2) A rolling average of monthly income and expenses shown on client ledgers if no tax forms are filed. <p>Hours of participation are then based on the income calculated by the above method and thus used to determine the amount of cash assistance. The net income as shown in the assistance budget is divided by the State or Federal minimum wage to arrive at the number of hours to be credited for monthly participation.</p> <p>Articles used to verify hours, i.e. employer reports or pay stubs will be retained in the participant's case file.</p>	

Work Activity: Subsidized Employment			
<i>Description</i>	<i>Countable Hours</i>	<i>Verification of Hours</i>	<i>Daily Supervision</i>
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.	Hours counted will be determined by the same processes utilized to verify hours.	<p>Hours will be determined based on verified employment hours from pay stubs, information from the Work Number, a written employer statement, or a telephone call to the employer and use an average of those hours to project participation for up to 6 months. Any changes known to the agency within those 6 months will be acted upon at the time of change.</p> <p>We are projecting hours of employment by:</p> <p>Unless Employment Verification indicates otherwise, we assume the participant works 5 days a week.</p> <p>1. Number of hours working per week ÷ 5 working days per week = hours per day working</p> <p>2. Hours per day working x total number of working days in the month = participation for the month</p>	Daily supervision to be provided by the participant's employer.

Work Activity: Work Experience			
<i>Description</i>	<i>Countable Hours</i>	<i>Verification of Hours</i>	<i>Daily Supervision</i>
<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 manager must consider the participant's:</p> <ul style="list-style-type: none"> ★ education and training ★ experience ★ work history ★ job skills ★ vocational interests and goals ★ limitations <p>Placement requires a written agreement between the Department and work site. Such agreement will include:</p> <ul style="list-style-type: none"> ★ start & end dates of placement ★ weekly scheduled activities ★ skill the participant will acquire <p>Placement must be reviewed regularly but must not exceed 6 months.</p>	<p>Hours counted will be based on the actual hours of work experience performed by the participant.</p> <p>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.</p> <p>When calculating hours of participation we will total actual hours of participation on daily or weekly verification documents. At the end of each month the hours from all applicable verification, by component, will be totaled and rounding of hours is allowed at that time.</p>	<p>Verification of hours will be determined by submission of weekly time sheets, (Attachment A) signed by the supervisor of the Work Experience site and the participant. Such 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			
<i>Description</i>	<i>Countable Hours</i>	<i>Verification of Hours</i>	<i>Daily Supervision</i>
<p>On-the-Job Training is training in the public or private sector that is given to a paid employee. Such participant must be assessed as job ready prior to placement. The intent of On-the-Job Training is to provide the participant with 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"> ★ is hired by the employer for full time work ★ is provided training needed for full job performance ★ receives wages and benefits comparable to other employees ★ is retained as regular employee after successful completion of the OJT <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 months.</p> <p>OJT may include classroom training when the participant is paid for the hours.</p>	<p>Hours counted will be determined by the same processes utilized to verify hours.</p>	<p>Hours will be determined based on verified employment hours from pay stubs, information from the Work Number, a written employer statement, or a telephone call to the employer and use an average of those hours to project participation for up to 6 months. Any changes known to the agency within those 6 months will be acted upon at the time of change.</p> <p>We are projecting hours of employment by:</p> <p>Unless Employment Verification indicates otherwise, we assume the participant works 5 days a week.</p> <ol style="list-style-type: none"> 1. Number of hours working per week ÷ 5 working days per week = hours per day working 2. Hours per day working x total number of working days in the month = participation for the month 	<p>Daily supervision to be provided by the participant's employer.</p>

Work Activity: Job Search and Job Readiness			
<i>Description</i>	<i>Countable Hours</i>	<i>Verification of Hours</i>	<i>Daily Supervision</i>
<p>Job Search is activity seeking or obtaining employment. It includes workshop activities that provide skills in job search, interviewing, work place expectations, resume writing, as well as actual job searching.</p> <p>Job Readiness are activities which prepare an individual to seek and obtain employment. Activities may include training in life skills or short-term substance and mental 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 will be based on actual verified hours attending a structured Job Search setting as well as verified contact with potential employers. We 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 will be based on actual verified hours attending a life skills workshop, substance or mental health treatment programs.</p> <p>An individual may not participate in Job Search/Job Readiness activities for more than four consecutive weeks, or a total of <u>240/360 hours</u> in the preceding 12 month period. The 12 month period begins with the first month in which the participant uses hours of Job Search/Job Readiness.</p> <p>Instructions to staff follow.</p>	<p>Participants will be 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. Contractor case management staff will 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> <p><u>Qualifying for 12 Weeks</u></p> <p>Due to SNAP participation, Nebraska has met the qualification for 12 weeks of Job Search during all of <u>FFY 2009, as well as the months of October thru January of FFY 2010.</u> We review the chart on the OFA website each month. If there is a month where we do not qualify for the additional 6 weeks of Job Search/job Readiness, 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	
Four Consecutive Weeks	Hourly Equivalent for 12 Weeks
<p>A participant's hours of JS/JR can be counted for only 4 consecutive weeks. Following a break of at least one week, the participant can again be allowed JS/JR hours for another 4 consecutive weeks until such time as they meet their total hourly limit for the year. Even one hour of JS/JR in a week uses up one of the 4 consecutive weeks. If the participant won't meet participation, continue to report these hours as "Other Work Activities". The counting of weeks will now begin with the first month hours are counted, and continue for a 12 month period.</p> <p>If the individual requires more than 4 consecutive weeks of JS/JR activities, the net result might be that they won't meet participation for a particular month because of non-countable hours during the 5th week. There are two methods of accounting for the shortage:</p> <ul style="list-style-type: none"> a) Allow excused absence based on participation in other countable activities. The hours of excused absence would count toward the countable work activity. OR b) If the excused absence option is not feasible, the hours of the other countable activities could be increased enough each week to account for the short fall, OR c) During the 5th week the participant could be involved in the additional countable activity for all required hours. 	<p>Rule changes define a week of JS/JR as an accrual, <u>during the preceding 12-month period</u>, of 20 hours for individuals with a child under age six or 30 hours for other participants.</p> <p>The counting of hours/weeks will now begin with the first month hours are counted, and 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			
<i>Description</i>	<i>Countable Hours</i>	<i>Verification of Hours</i>	<i>Daily Supervision</i>
<p>Specific allowable activities are:</p> <ul style="list-style-type: none"> -Contact with employers to complete job applications, interviews, and follow-up to applications. -Workshop settings that will provide the participant with skills in how to search for a job, prepare a resume, apply for a job, as well as workplace expectations. -Attendance at counseling or treatment appointments for mental health and substance abuse issues. 	<p>When calculating hours of participation we will total actual hours of participation on daily or weekly verification documents. At the end of each month the hours from all applicable verification, by component, will be 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 will be maintained in the participant's case file.</p> <p>For those hours spent in a structured job search setting or job readiness workshops, participants will be required to register at the beginning of each session and check out at the end of the session. A log of those hours will be maintained in the participant's case file.</p>	<p><u>Assuring 12 Weeks</u></p> <p>During the process of compiling Work Participation data each month, if an individual is identified as being involved in Job Search or Job Readiness activities we review activities in the previous month to determine if the individual has used 4 consecutive weeks. We review the preceding 12 month period to determine if the individual has used the maximum # of weeks. If either of these two parameters is met, we report participation at 0 hours.</p> <p>In addition, staff will maintain a tracking sheet (Attachment A) for each individual which shows the weeks and hours of Job Search in each 12 month period.</p>

Work Activity: Community Service Program			
<i>Description</i>	<i>Countable Hours</i>	<i>Verification of Hours</i>	<i>Daily Supervision</i>
<p>Community Service 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>Work sites may include federal, state, county, local and tribal governments and colleges, universities and school districts. Community service includes participation in volunteer organizations such as Americorps, Volunteers in Service to America (VISTA), private volunteer organizations, or court ordered community service.</p> <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"> ★ Education and training ★ Experience ★ Work history ★ Job skills ★ Vocational interests and goals ★ Limitations <p>Community Service may include short term training that is of limited duration and a necessary or regular part of the placement.</p> <p>Nebraska does not allow self-initiated Community Service. All placements must be coordinated through the Case Manager. Requires written agreement between the Department and work site.</p>	<p>Hours will be determined by adding the TANF grant allotment for the TANF household and dividing that result by the Federal Minimum Wage. Benefits will be 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 individual is participating their required number of hours, participation will be allowed at the full 20 hours per week.</p> <p>When calculating hours of participation we will total actual hours of participation on daily or weekly verification documents. At the end of each month the hours from all applicable verification, by component, will be totaled and rounding of hours is allowed at that time.</p>	<p>Hours of participation will be those hours the participant is actually on site. They will be verified by time sheets (Attachment A) submitted to the case manager or contract provider on a weekly basis. Time sheets will be signed by the site supervisor and the participant. They will be retained in the participant's case record.</p> <p>Verification of Americorps or court ordered community service hours will be provided by the person actually supervising such activity.</p>	<p>Daily supervision will be provided by staff at the Community Service site, the Employment First case manager or contract provider.</p>

Work Activity: Vocational Training			
<i>Description</i>	<i>Countable Hours</i>	<i>Verification of Hours</i>	<i>Daily Supervision</i>
<p>Vocational Training is an organized program that is directly related to preparing an individual for work in current or emerging occupations. Such programs include:</p> <ul style="list-style-type: none"> -Associate Degree Programs -Certificate programs based on credits accumulated at an institution -Certificate programs developed by industries to teach specific skills -Specific skill related programs of a nondegree nature -Bachelor Degree Programs 	<p>Hours will be determined based on class times indicated on class schedule from the educational program.</p> <p>One hour of unsupervised study time per hour of class time will be countable.</p> <p>Additional study time will be allowed as participation when it is supervised by:</p> <ul style="list-style-type: none"> -Employment First case manager or contract provider. -The training program. -A community site that is monitored. 	<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 biweekly basis.</p> <p>A statement from the educational institution will verify the amount of study time required for a particular class.</p> <p>Attendance sheets, signed by a monitor at the supervised study site and the participant will be used to verify supervised study time.</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> <hr/> <p style="text-align: center;"><i>Assuring 12 Months</i></p> <hr/> <p>During the process of compiling data for the ACF-199, we 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 0.</p> <p>Staff will maintain a tracking sheet (Attachment A) for each individual which shows the months of Vocational training use by each participant.</p> <p>During 2007 Nebraska's monthly caseload report will be updated to include a report to staff that shows months of Vocational Training used by each participant.</p> <p>We will also be checking the number of cases with in educational activities to be certain we don't exceed the 30% maximum.</p>
<i>ABE, ESL</i>	<p>This activity has a Federal lifetime limit of 12 months per participant.</p> <p>Nebraska has adopted a 36 month limit for Vocational Training activities. We acknowledge that any months beyond the 12 month Federal lifetime limit will not count toward our Federal Work Participation Rate.</p>		
<p>A review of the class schedule will be used to assure any basic and remedial education or ESL classes are part of the training program.</p>			

Work Activity: Vocational Training, Cont.			
<i>Description</i>	<i>Countable Hours</i>	<i>Verification of Hours</i>	<i>Daily Supervision</i>
<p>Distance and on-line course work will be allowed when the participant is involved in an accredited degree program that includes attendance in on campus classes. The class must only be available on-line or it must be a requirement of the school that the student take the class on-line.</p> <p>Such coursework will only be allowed when the training program includes mechanisms for providing reports that document the actual time the participant is accessing the on-line training program or the on-line training is conducted in a supervised setting.</p>	<p>When calculating hours of participation we will total actual hours of participation on daily or weekly verification documents. At the end of each month the hours from all applicable verification, by component, will be totaled and rounding of hours is allowed at that time.</p>	<p>Involvement in on-line class time will be verified by:</p> <p>Log-in and log-out records available on-line from the educational institution or in electronic format. Reports of progress, such as course completion, grades, etc. must also be provided.</p> <p>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.</p> <p>All verifications will be retained in the participant's case record.</p>	<p><i>(Previous Page)</i></p>

Work Activity: Job Skills Training Directly Related to Employment			
<i>Description</i>	<i>Countable Hours</i>	<i>Verification of Hours</i>	<i>Daily Supervision</i>
<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"> -Associate Degree Programs -Certificate programs based on credits accumulated at an institution -Certificate programs developed by industries to teach specific skills -Specific skill related programs of a nondegree nature -ABE or ESL class work <p>Distance and on-line vocational educational training programs will only be allowed when the training program includes mechanisms for providing reports that document the actual time the participant is accessing the on-line training program or the on-line training is conducted in a supervised setting</p>	<p>Hours will be determined based on class times indicated on class schedule from the educational program.</p> <p>One hour of unsupervised study time per hour of class time will be countable.</p> <p>Additional study time will be allowed as participation when it is supervised by:</p> <ul style="list-style-type: none"> -Employment First case manager or contract provider. -The training program. -A community site that is monitored. <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 will be verified by an attendance record signed by a representative of the educational entity and the participant on a biweekly basis.</p> <p>A statement from the educational institution will verify the amount of study time required for a particular class.</p> <p>Attendance sheets, signed by a monitor at the supervised site and the participant will be used to verify supervised study time.</p> <p>Such verification will be 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, Cont.			
<i>Description</i>	<i>Countable Hours</i>	<i>Verification of Hours</i>	<i>Daily Supervision</i>
<p>Distance and on-line course work will be allowed when the participant is involved in an accredited degree program that includes attendance in on campus classes. The class must only be available on-line or it must be a requirement of the school that the student take the class on-line.</p> <p>Such coursework will only be allowed when the training program includes mechanisms for providing reports that document the actual time the participant is accessing the on-line training program or the on-line training is conducted in a supervised setting.</p>	<p>When calculating hours of participation we will total actual hours of participation on daily or weekly verification documents. At the end of each month the hours from all applicable verification, by component, will be totaled and rounding of hours is allowed at that time.</p>	<p>Involvement in on-line class time will be verified by:</p> <p>Log-in and log-out records available on-line from the educational institution or in electronic format. Reports of progress, such as course completion, grades, etc. must also be provided.</p> <p>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.</p> <p>All verifications will be retained in the participant's case record.</p>	<p><i>(Previous Page)</i></p>

Work Activity: Education Directly Related to Employment			
<i>Description</i>	<i>Countable Hours</i>	<i>Verification of Hours</i>	<i>Daily Supervision</i>
<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"> -Certificate programs based on credits accumulated at an institution -Certificate programs developed by industries to teach specific skills -Specific skill related programs of a nondegree nature -ABE or ESL class work <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, in order to continue this activity.</p>	<p>Hours will be determined based on class times indicated on class schedule from the educational program.</p> <p>One hour of unsupervised study time per hour of class time will be countable.</p> <p>Additional study time will be allowed as participation when it is supervised by:</p> <ul style="list-style-type: none"> -Employment First case manager or contract provider. -The training program. -A community site that is monitored. <p>When calculating hours of participation we will total actual hours of participation on daily or weekly verification documents. At the end of each month the hours from all applicable verification, by component, will be 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 biweekly basis.</p> <p>A statement from the educational institution will verify the amount of study time required for a particular class.</p> <p>Attendance sheets, signed by a monitor at the supervised site and the participant will be used to verify supervised study time.</p> <p>Good and satisfactory progress will be verified by grade reports at the completion of each session.</p> <p>All verification will be 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: Satisfactory Attendance at a Secondary School or a Course of Study Leading to a Certificate of General Equivalence			
<i>Description</i>	<i>Countable Hours</i>	<i>Verification of Hours</i>	<i>Daily Supervision</i>
<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, in order to continue this activity.</p>	<p>Hours will be determined based on class times indicated on class schedule from the educational program.</p> <p>One hour of unsupervised study time per hour of class time will be countable.</p> <p>Additional study time will be allowed as participation when it is supervised by:</p> <ul style="list-style-type: none"> -Employment First case manager or contract provider. -The training program. -A community site that is monitored. <p>When calculating hours of participation we will total actual hours of participation on daily or weekly verification documents. At the end of each month the hours from all applicable verification, by component, will be 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 biweekly basis.</p> <p>A statement from the educational institution will verify the amount of study time required for a particular class.</p> <p>Attendance sheets, signed by a monitor at the supervised site and the participant will be used to verify supervised study time.</p> <p>Good and satisfactory progress will be verified by grade reports at the completion of each session.</p> <p>All verification will be 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.

II. Hours Engaged in Work

Excused Absences

Nebraska will allow the following state holidays:

Holiday	Date	Holiday	Date
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 th
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 Food Stamp Program. This approval allows us to use the following formula to determine required hours of participation per month for the Community Service Program:

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

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 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/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 SSI or SSDI. Nebraska does not consider disabled parents receiving Social Security Disability Income or Supplemental Security Income 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 Policy states: "The need for such care must be supported by a signed statement from a licensed medical professional. The disability of the family member being cared for should be evaluated periodically, depending on the diagnosis and prognosis for recovery in order to determine if the parent is still needed in the home to provide care." And

"The case manager must review the exempt status:

1. At the time of redetermination of eligibility for ADC;
2. When the case manager becomes aware of a change which may affect exempt status; or
3. Within 30 calendar days of a request by the client or another case manager to reconsider "mandatory" status."

Documentation:

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

2. Verification of Work-Eligible status – We are assured of the accuracy of identifying work-eligible individuals because of the data entry requirements in our automated eligibility system. (N-Focus) The “new” 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 children in the TANF case. When there are 2 adults, each with a parental relationship to the children, it is identified as a two-parent family with corresponding work participation requirements. If there is only one identified adult, or minor parent head-of-household, with a parent role to the children in the case, it will be included in the overall work participation data.
3. Accurate Data Assurance – Nebraska has developed tools (Attachment A) for use by case managers and workers to track and verify the actual hours of participation by work-eligible individuals. These tools will be required for use on a statewide basis and are included as an attachment to this plan. Our automated eligibility system only allows staff to enter participation hours for federally defined activities, thereby assuring we do not report non-countable activities.

IV. Internal Controls

Work Verification Procedures - The Department 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 assure benefits are accurately determined. In addition, the TANF Policy Unit has *five (5)* designated staff who conduct reviews of the Employment First related TANF cases each month. These reviews monitor the actual case accuracy, as well as service plans, supportive services, and participation verification and documentation for each individual.

1. Our average number of reviews per month is **475** TANF related cases. TANF Policy Staff review an average of *330* cases each month to assure compliance with TANF Work Verification Procedures and Requirements. An additional *145* cases are reviewed by TANF Policy Staff each month to assure contracted case management meets Nebraska’s expectations and requirements. We now have the capability for online management reports showing the results of these reviews and are able to identify policy areas where staff need to be provided with additional information. Conducting a random sample of approximately 4,300 TANF cases will provide results in which we can be 99% confident that the results are within 2% of what would be found if all the state’s 5,732 cases were reviewed.

We continue to monitor case activity from the ACF-199 report. When areas of inaccuracy are identified, contact is made with eligibility staff and their supervisors. Our expectation is that identified cases will be corrected, and the worker and supervisor will develop a greater understanding of policy and system issues.

Second level reviews of TANF case reviews will be completed by a TANF Policy Staff person each month. Of the *475* cases reviewed *monthly*, a *second-level review will be conducted on 15% of selected staff’s work participation case reviews* each month.

Each month a management report is generated from our automated eligibility system that lists Employment First Cases where the individual is exempt from participation and the exemption exceeds the maximum number of months allowed by policy. These reports shows cases by Service Area, Office, Supervisor, and Worker.

These report is to be reviewed by Employment First Case Management Supervisors with the expectation that staff will follow through with processes necessary to insure accuracy of the work activity information. As supervisors review the monthly Case Activity reports, any miscalculation that resulted in incorrect entry will be reflected in the reports.

The State of Nebraska will maintain all pertinent findings produced through these internal control processes and can and will be made 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 month the Employment First Case Manager calculates the verified hours of participation and enters that amount in the automated eligibility system. 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 policy 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

The N-Focus system includes system edits to verify the data input by eligibility staff. Prior to our run of cases for the ACF-199 report, all elements of eligibility are verified. Inconsistencies between two 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 worker and case number. Our processes for verification and reporting of data are the same for TANF and SPP 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, we assign a stratum code to cases based on 2-parent, 1-parent and child only cases.
-Case #	The Case # is based on the unique identifying number established by our eligibility system at the time the individual applied for assistance.
-Disposition	Because we only report on cases that actually received a TANF or SSP payment in the month, our controls assure no cases are “listed in error.”

Type of Family for Work Participation	For each TANF/SSP payment case we determine if there are adults (age 19 & over) in the unit. If no adults in the unit we check for minors who meet the definition of head of household. If neither of these conditions are 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 single parent. If there are two adults the case is reported as two-parent.
Amount of SNAP	Based on actual issuance of SNAP (Supplemental Nutrition Assistance Program) benefits for the month as shown in our automated eligibility system. If the food stamp case includes individuals who are not part of the TANF/SSP case, we prorate benefits by: $\frac{\text{Total FS Allotment}}{\# \text{ of participants in FS Case X} + \# \text{ of participants in TANF or SSP payment case.}}$
Receives Subsidized Child Care	After identifying those cases that received a TANF/ SSP cash assistance payment for the month, the automated eligibility system is checked to determine if any TANF/SSP unit members are also participants in a Subsidized Child Care Program case.
Amount of TANF/SSP Assistance	After identifying those cases that received a TANF/SSP cash assistance payment for the month, we identify the actual amount of such payment from the automated eligibility system.
Family Affiliation Code	After identifying those cases that received a TANF/SSP cash assistance payment for the month, we identify the participants and financially responsible individuals in each payment case. We then check 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, we identify the actual birth date for each individual as shown in our automated eligibility system. Birth dates are validated through a SVES Interface.
Relationship to Head of Household	After identifying those cases that received a TANF/SSP cash assistance payment for the month, we identify the relationship of each individual in the assistance case to the person who is previously identified as Head of Household by extracting data from our automated eligibility system.
Parent with Minor Child	During the determination of eligibility for Cash Assistance, the N-Focus system checks ages of all family members as well as family relationship 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, we identify 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 are 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, we identify the actual birth date for each individual as shown in our automated eligibility system. Birth dates are 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 single parent with 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 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 parent or relative with 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 6 is set accordingly.

This is to certify that the Amended Nebraska TANF Work Verification Plan updated *June 2017* 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 *June 6, 2017*.

(Original Signed)

Samuel Malson, TANF Program Manager

Nebraska Department of Health & Human Services

Weekly Time Sheet (Effective 08/01/2009)

The participant and site supervisor must verify information, sign and date.
 Please forward the completed form to the Employment First Case Manager no later
 than _____ every _____

Participant

Site Supervisor

Name: _____

Name: _____

MC#: _____

Phone#: _____ Ext: _____

Worksite: _____

Week of: _____

	Date:	Time In:	Time out:	*Total Hrs:
Monday				
Tuesday				
Wednesday				
Thursday				
Friday				
Saturday				
Sunday				

<input type="checkbox"/> Community Service
<input type="checkbox"/> Work Experience

Progress	
Attendance	
Cooperation	
Follows Direction	
Job Knowledge	

Please use the following scale:
 S = Satisfactory
 N = Needs Improvement
 P = Progressing

*Please round to the nearest quarter hour.

*Total Hours: _____

Participant Signature: _____ Date: _____

Supervisor Signature: _____ Date: _____

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 timesheet.

Nebraska Department of Health & Human Services
Employment First – Daily Job Search Timesheet (Effective 08/01/2009)

Date: _____

Contractor On-Site Time _____

Participant Name: _____ **Last 4 Digits of SSN** _____

Company Name		Company Address	
Company Phone		Company Contact	Office Use Only
Position	Action A R I	Time spent – ½ Hour 1 Hour Circle One 1 ½ Hours 2 Hours	Hours:
<input type="checkbox"/> Online Application Application # _____ or Monitor Initial _____			

Company Name		Company Address	
Company Phone		Company Contact	Office Use Only
Position	Action A R I	Time spent – ½ Hour 1 Hour Circle One 1 ½ Hours 2 Hours	Hours:
<input type="checkbox"/> Online Application Application # _____ or Monitor Initial _____			

Company Name		Company Address	
Company Phone		Company Contact	Office Use Only
Position	Action A R I	Time spent – ½ Hour 1 Hour Circle One 1 ½ Hours 2 Hours	Hours:
<input type="checkbox"/> Online Application Application # _____ or Monitor Initial _____			

Company Name		Company Address	
Company Phone		Company Contact	Office Use Only
Position	Action A R I	Time spent – ½ Hour 1 Hour Circle One 1 ½ Hours 2 Hours	Hours:
<input type="checkbox"/> Online Application Application # _____ or Monitor Initial _____			

Total Daily Hours _____

Participant Signature: _____ **Date:** _____

Daily Monitor Signature: _____ **Date:** _____

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



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	