

Department of Public Health and Human Services	SECTION: PARTICIPATION REQUIREMENTS
WoRC GUIDELINES MANUAL	SUBJECT: Participation Reconciliation

References: 45 CFR 261.20-.25; TANF 701-4

GENERAL RULE -- States must report the actual number of participation hours for each work activity in which an adult (or minor child head of household) participated. The state must report actual participation hours for each benefit month rather than the hours negotiated to ensure "accurate and complete" information is reported in the TANF file. Refer to TEAMS Screen Guide, 700-S.10-12 and TEAMS Process Guide 700-P.2, for TEAMS procedures. NOTE: Website address link listed in the Index.

NOTE: A state's participation rate is calculated on the participation status of each individual required to participate and is NOT averaged out over the entire caseload.

CASE MANAGEMENT VS. RECONCILIATION:

Reconciliation is focused on specific activities/hours and is necessary in order to meet federal reporting and participation requirements. It is the process followed to complete federal reporting by documenting that the participant has completed the required number of participation hours.

Collecting time sheets weekly will facilitate reconciliation of participation and **does not** replace or change the current process used by local offices to verify progress in negotiated Employability Plan activities.

- ▶ Example: Weekly time sheets represent how a participant spent each day of the week i.e., Monday 4 hrs WEX placement and 2 hrs JST and so on throughout the week. The signed time sheet from the WEX site, which is signed by the sponsoring supervisor, and the attendance sheet from the JST class signed by the instructor is the supporting verification and what will be used to reconcile hours. Third party verification of specific activities must be used to reconcile the actual hours completed.

Case Management includes negotiation of activities and hours and is primarily focused on planning for and tracking the progress of the participant. It is the delivery of individualized services for each WoRC participant and is the program portion designed to assist in progress toward employment.

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► **RECONCILIATION RULES:**

- Only actual hours of participation in primary and secondary activities may be reconciled. Scheduled hours are used for negotiating activities but not for the reconciliation process. Third party verification needs to support the information/timesheet submitted by the participant. Third party verification is needed in order to reconcile actual hours.
- Case managers need to reconcile all hours possible. A total of 160 hours can be reconciled. All activity hours completed should be reconciled regardless of whether it meets “full” or “partial” participation. If the total hours include a fraction of time, i.e. 10.5 hours, the activity would be reconciled as 11 hours. If the time is less than ½ hour, the activity would be rounded down.
- Holidays **as defined** can be counted towards the reconciled activity hours. Holidays are countable when the participant is involved in unpaid allowable work activities and the participant was **scheduled** to participate in an activity on the holiday. Holidays are countable when the participant is involved in employment activities only if they are paid for the holiday.
- Excused absence hours can be counted in the reconciled hours providing the participant had good cause and was involved in unpaid allowable work activities (WEX, JBS, CSP, JST, ABE, HSE). Only 16 hours of excused absences are allowed per month and a total of 80 hours in a preceding 12 month period.
- Employment hours reconciled includes the actual hours worked, or based on the employer verification form, if the case is closing or the participant is transitioning to Post Employment. Holidays and excused absences are not included in the employment reconciliation unless the participant is paid for the time. A copy of the employment verification form or verification from OPA of collateral contact (TEAMS case note or employer verification form completed by OPA) with the employer must be in the WoRC case file. **The collateral contact information should only be use in rare circumstances. The employment verification form is the preferred method.**

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- Substance abuse, mental health or rehabilitation activities that are supported by medical or legal documentation can be coded and reconciled as an assessment activity or under the JBS component.
- Self-employment is an allowable work activity. Only the first month of a business start-up may be coded as JBS. In order to determine the allowable Employment hours, the formula “gross earnings minus expenses divided by federal minimum wage equals the allowable hours” must be used. The current federal minimum wage is \$7.25 per hour.
- Participants are responsible for submitting timesheets and third party verifications on a weekly basis. If the participant loses a timesheet, it is the participant’s responsibility to recreate their timesheet and verify the activity hours.
- Assessment activities for WEX, CSP, STT, HSE, and ABE must be verified by third party verification and assessment forms must be present in files. **An Assessment Activities Log must be in the file to support all assessment activities. Actual, verified hours completed under “assessment” need to be reconciled.**
- Job search/job readiness activities are reconciled using the actual time spent job searching, class time, etc. Equating hours to the number of contacts is unallowable for the reconciliation process. The HCS 774 Weekly Job Search Timesheet and Employer Contact Sheet must be used by the participant to record their individual job search activities. The HCS 774 must be accompanied by either verification of the job search activities or a random review must be completed and case noted by the case manager.
- Reconcile days and hours for the current month only. If the month ends mid week hours for that week need to be separated for the two months and cannot be double counted. Activities must be reconciled in the correct time period.

GOOD CAUSE:

Participants may have good cause for not participating, which will prevent the case manager from recommending a sanction. The good cause reason may be noted as full participation by using excused absence hours (no more than 16 hours per month). If a participant has used their leave

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hours and has temporary good cause, the month should be reconciled with only the hours that were actually completed and no sanction recommendation made. This leave time must be hand tracked by the case manager in the case file.

GOOD CAUSE REASONS RELATED TO PROGRAM COMPLIANCE:

Good cause occurs when circumstances beyond the participant's control prevent compliance with a requirement. Good cause for failure to keep appointments, report changes, provide required information, or comply with FIA/EP activities includes, but is not limited to, the following circumstances: (*Temporary refers to 2-3 days*)

- (1) *Temporary* severe illness or incapacity of the participant for the duration of the illness or incapacity;
- (2) *Temporary* severe illness or incapacity of another household member sufficiently serious to require the presence of the participant for the duration of illness or incapacity;
- (3) Death or funeral attendance of an immediate family member, or at an agency's discretion, another person;
- (4) *Temporary* inability to obtain necessary child care;
- (5) Adverse weather conditions which make travel impossible or unreasonably dangerous;
- (6) *Temporary* lack of transportation in a case where the participant cannot reasonably be expected to walk or bicycle because of the distance or the participant's health or physical limitations—transportation is considered to be available if the participant has the use of a private vehicle, has access to public transportation, or can ride with someone else, provided that a participant will not be required to accept a ride under circumstance which a reasonable person would consider dangerous or unsuitable;
- (7) The individual is unable to comply due to a current domestic violence situation;
- (8) Any other circumstances which are beyond the individual's control.

****Transportation and child care back-up plans should be in place as part of initial planning. Incarceration is not good cause.**

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GOOD CAUSE REASONS RELATED TO EMPLOYMENT:

If the participant terminates, reduces earnings or refuses suitable employment, one of the following circumstances must be present and verified by the participant to avoid the adverse action: (*Temporary refers to 2-3 days*)

- (1) *Temporary* illness or incapacity that is verified by a medical professional;
- (2) *Temporary* severe illness or incapacity of another household member sufficiently serious to require the presence of the participant as stated by a medical professional;
- (3) Physical or mental impairment which prevents the participant from accepting or maintaining this employment as stated by a medical professional;
- (4) The participant is 60 years of age or older;
- (5) *Temporary* lack of transportation in a case where the participant cannot reasonably be expected to walk or bike;
- (6) *Temporary* inability to obtain necessary child care during employment hours verified by a R&R agency;
- (7) Working conditions are unsuitable because of an unreasonable degree of risk to health or safety, or lack of worker's compensation coverage;
- (8) Unable to comply due to a current domestic violence situation, must be verified by police or agency;
- (9) Participant lacks the necessary work-related skills for employment and cannot acquire skills in time to retain employment;
- (10) Wage that is offered is less than state minimum wage.

****Transportation and child care back-up plans should be in place as part of initial planning. Incarceration is not good cause.**

PARTICIPATION RECONCILIATION TEAMS SCREEN: PARE

The Participation Reconciliation (PARE) screen enables the WoRC Case Manager to identify whether the employability plan will be auto-reconciled (Y) or manually reconciled (N). The PARE screen is used for data entry only. The PARE screen will allow for multiple entries in order that the participation registration process may be accomplished for one or more individuals.

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The data for each participant entered on PARE will be stored in his/her person record and can be viewed on the Participant History (PAHI) screen the following day. The WoRC Case Manager will enter the BENEFIT MONTH, CASE NUMBER, PERSON NUMBER and respond with a 'Y' or 'N' under the ACTIVITIES COMPLETED column for each entry.

AUTO-RECONCILIATION: 'Y'

Auto-reconciliation is processed by entering a 'Y' in the ACTIVITIES COMPLETED field if the participant has completed his/her employability plan requirements exactly as negotiated. When the indicator is set to 'Y', TEAMS will automatically reconcile all negotiated activities during the nightly batch process and display the reconciled hours on the Employability Plan/FIA Reconciliation (EMPR) screen.

NOTE: A 'Y' indicator may be changed to 'N' on the same day it is entered but may not be changed after the auto-reconciliation process has occurred.

MANUAL RECONCILIATION: 'N'

Manual reconciliation is processed by entering an 'N' in the ACTIVITIES COMPLETED field when the participant's actual hours completed for a component are not exact to the negotiated hours for the benefit month. When the indicator is set to 'N', the WoRC case manager must manually reconcile the employability plan using the Employability Plan Reconciliation (EMPR) screen. NOTE: For further detail on EMPR reconciliation see the TEAMS Screen Guide, EMPR 700-S.11)

NOTE: An 'N' indicator may be changed to a 'Y' on the same day it is entered but only if manual entries have not been made on EMPR for the benefit month.

TEAMS will store all valid data once the edit checks are passed and ENTER is pressed. To exit the screen without saving any data, press F2 or F3.

SYSTEM RECONCILIATION:

Hours associated with mandatory activities, Tribal NEW and HNC are automatically reconciled by the system at the month end process.

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EMPLOYABILITY PLAN/FIA RECONCILIATION TEAMS SCREEN: EMPR

The employability plan/FIA reconciliation (EMPR) screen is used by case managers to view reconciled activities for any individual required to participate in FIA/EP activities. In addition, the screen **is used to facilitate manual reconciliation of employability plan activities/hours negotiated between the participant and a WoRC Case Manager.**

NOTE: Only WoRC Case Managers/Supervisors will be allowed to enter data on EMPR and only when the participant has been flagged for manual reconciliation on PARE.

- ▶ **NOTE:** Only the WoRC Supervisor can change the reconciled hours if the reconciliation process was completed manually. Example: when the case manager has reconciled based on the information received to date and then later in the reconciliation month receives additional documentation, the additional hours can be added to the EMPR screen by the WoRC Supervisor. If the case has been reconciled through the “auto” reconcile process, the WoRC supervisor cannot change the EMPR screen and the WoRC case manager must enter a case note explaining what the reconciled hours should be and the verification received to support the additional hours.

RECONCILIATION FOR CASE TRANSFER:

When the individual requests a case be transferred to a new county, the Social Service Specialist must notify the WoRC Case Manager to change the activities on WRCS to reflect JBS or other appropriate activity (move to new county) for the remainder of the transfer month. The changes must be made on EMPL screen before the case is CARCed. The WoRC case is then CARCed to the new county’s JXX999 number and the Social Service Specialist CARC’s the case to TXX999.

TRANSFERRING COUNTY ACTION:

EXAMPLE: Single parent household in Missoula County is a WoRC referral for June. Participant moves to Hill County on June 15. The Social Service Specialist in Missoula notifies the Missoula WoRC Case Manager of the transfer request. The Missoula WoRC Case Manager

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would reduce the hours on existing components on EMPL to a total of 60 and enter JBS with 60 hours “move to Hill County”. The Missoula WoRC Case Manager would then CARC the case to J21999 and let the Missoula Social Service Specialist know when this has been done. The Missoula Social Service Specialist would then CARC the case to T21999.

RECEIVING COUNTY ACTION:

EXAMPLE (continuation of above): The Social Services Specialist in Hill County needs to schedule a FIA appointment as soon as possible and a WoRC referral will need to be made to the Hill County WoRC program. The WoRC program needs to attempt to contact the participant once they receive the case transfer referral on RELI and the referral from OPA. It is imperative the sending and receiving WoRC programs communicate and work together to reconcile the participation hours.

PARTICIPATION HISTORY (PAHI):

The Participation History screen (PAHI) provides a historical record of all individuals on a case that have negotiated an EP/FIA. When reconciliation is completed on the Participation Registration (PARE) screen, PAHI is auto populated in the overnight batch process. The screen will display a list of all individuals in the case that have negotiated an EP/FIA for the benefit month selected, the date his/her participation was reconciled and the method of reconciliation.

‘A’ denotes the participation was auto reconciled with a ‘Y’ on PARE.
‘M’ denotes the participation was manually reconciled with an ‘N’ on PARE and then activities manually reconciled on the Employability Plan Reconciliation screen (EMPR).

RECONCILIATION OF HNC (EMPR):

The HNC component code will be available for use during manual reconciliation by a WoRC Case Manager on the Employability Reconciliation screen (EMPR). The HNC component can be added on EMPR provided it is being entered for the first two months of benefits.

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Hours attributed to the HNC code on EMPL will display on EMPR and can be updated on EMPR as long as the hour edits are met.

RECONCILIATION OF HNC (PARE):

If a WoRC Case Manager indicates that the EP should be auto-reconciled ('Y' placed on PARE), TEAMS will auto-reconcile the negotiated hours attributed to the HNC component.

SYSTEM RECONCILIATION:

The HNC component code will be system reconciled if it has been on EMPL by an OPA Case Manager (referral to Tribal NEW).

RECONCILIATION OF EMPLOYMENT HOURS:

When a TANF case is closing, but the participant is employed, either part-time or full-time, it is often difficult to obtain timesheets, pay stubs or other documentation of employment hours from the participant.

In order to assist with the reconciliation of employment hours, we are implementing the following policy/process effective immediately:

► **POLICY:**

If a TANF case is closing (verified by notice of closure from OPA) and the participant has failed to provide pay stubs or other documentation verifying employment hours for participation purposes, the WoRC program may reconcile hours of employment as follows:

- The OPA **must** have a signed statement, employment verification form, or collateral contact with the employer (TEAMS case note) indicating the following:
 - Start date of employment
 - Anticipated hours of employment
 - Hourly wage
- The WoRC Office must obtain a copy of the signed statement, employment verification form or the TEAMS case note for the WoRC case file.
- The “prospected” hours of employment may be reconciled using the following guidelines:
 - The hours may only be reconciled from the start date of employment;

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- The reconciled hours may **not** exceed the “anticipated” hours as stated on the statement or form;

When a client verbally reports the change and requests case closure, verification should be requested but if not obtained, hours cannot be reconciled as EMP. Also the OPA should use ROR (client request) as the closure reason and not IEN (income exceeds need).

Example 1:

Joe reports to the OPA on 10/10/09 that he has gained employment at Rock Hand Hardware. He is given an employment verification form, which he returns to the OPA on 10/15/09. The employment verification form indicates that Joe will begin work on 10/22/09. He will be scheduled to work 35 hours per week (Mon-Fri 7 hours per day) at \$8.00 per hour. His TANF case closes effective 10/31/09 due to income.

Joe contacts his WoRC Case Manager and reports the job. He renegotiates his EP to be EMP for 35 hours per week effective 10/22/09. The WoRC Case Manager reminds Joe that he will need to provide pay stubs and/or time sheets to verify the employment hours, but Joe does not provide the information.

If the WoRC Case Manager had obtained a copy of the signed employment verification form, they would reconcile EMPR for October as follows:

CMP	START	END	NEG	REC	METHOD
EMP	10/22/09	10/28/09	035	035	M
EMP	10/29/09	10/31/09	021	021	M

All other activities for October would be reconciled based on the **actual** verified hours of participation.

Reminder:

- If the employer statement was not provided until 10/22 and case was not closed until 11/30/08, employer statement could be used to reconcile November EMPR.

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Example 2:

Susie reports to OPA on 10/25/09 that she was hired at Big Sky Care Center on 10/22/09. She provides a signed statement from the employer which indicates that Susie will begin work on 10/29/09 and is scheduled to work 40 hours per week, Friday – Tuesday 8 hours per day. Susie's TANF case will close effective 11/30/09 due to income.

Susie meets with her WoRC Case Manager and renegotiates her EP for the last week of October and November. The renegotiated EP is as follows:

EMP	10/29/09	10/30/09	016
EMP	11/01/09	11/30/09	160

The WoRC Case Manager reminds Susie that she will need to provide pay stubs and/or time sheets to verify the employment hours, but Susie does not provide the information. If the WoRC Case Manager has obtained a copy of the signed employment statement or collateral information from OPA, they would reconcile EMPR for October as follows:

CMP	START	END	NEG	REC	METHOD
EMP	10/29/09	10/30/09	016	016	M

All other activities for October would be reconciled based on the actual verified hours of participation.

The WoRC Case Manager would reconcile EMPR for November as follows:

CMP	START	END	NEG	REC	METHOD
EMP	11/01/09	11/30/09	160	160	M