

STATE OF NEVADA



Temporary Assistance for Needy Families (TANF) Work Verification Plan FFY 2020

Working for the Welfare of ALL Nevadans

(Last Revised May 2020)

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OVERVIEW

The Nevada Division of Welfare and Supportive Services' TANF Employment and Training program is called "New Employees of Nevada (NEON)". The program provides a wide array of services designed to assist TANF households become self-sufficient primarily through training, employment, and wage gain, thereby reducing or eliminating their dependency on public assistance programs.

I. APPROVED WORK ACTIVITIES

This section describes the services the Division includes under each activity, how the number of approved activity hours of participation for each activity is determined, how the actual hours of participation are verified, and the methods of supervision used for each unpaid work activity.

GENERAL DOCUMENTATION POLICY

Documentation to determine eligibility or verify participation hours may be mailed, faxed, received electronically and/or dropped off at a district office. Documentation may be solicited and submitted directly from a third party, or the participant may be responsible for obtaining and submitting acceptable documentation. All documentation received will be retained by the state for at least 37 months (the state's standard retention policy). The Division retains documentation of work activity hours in five primary locations: The individual's case jacket/file (both hard copy and electronic), the Online Automated Self-sufficiency Information System (OASIS) case management system, the Application Modernization and Productivity Services (AMPS) system, the Nevada Operations of Multi-Automated Data System (NOMADS) eligibility system; and DWSS' Central Office (when obtained as part of the Division's TANF data reporting monthly audit). Verified hours are entered into OASIS for tracking and reporting purposes. OASIS tracks all hours entered with the time-limited activities hours that exceed those limits flagged as non-countable. Hours flagged as non-countable due to exceeding time limits are not reported. The OASIS electronic records are currently kept indefinitely.

1. Unsubsidized Employment

a. Description of Services

Unsubsidized employment is defined as full or part-time employment in a private, public, or non-profit organization when the individual is receiving non-subsidized compensation for such work. Unsubsidized employment includes self-employment and work in exchange for in-kind services, but excludes employment defined under the – 'subsidized employment' - section below.

b. Determining Approved Activity Hours

Projecting Hours

The Division will report actual verified and documented hours of work. The Division will project hours based on an average of actual hours for up to six months, providing the participant is scheduled to work a customary number of hours. When a change in hours is reported or becomes known to the agency, the Division will request verification and update the projection.

Unless otherwise specified, actual hours of participation will be averaged as follows:

Weekly or Bi-weekly Pay Periods:

- One full week of verified actual hours may be projected forward if the employer has signed a statement indicating the number of hours is expected to remain the same.
- Two or more weeks of actual hours may be averaged by totaling the number of hours worked and dividing by the number of weeks. If a week is not representative of what is expected in the future, it will be dropped or adjusted when determining the average.

The weekly average is entered into our tracking system for the report month.

Semi-Monthly Pay Periods:

OASIS is designed to capture hours based on weeks, with each week being a consecutive seven-day period. To accurately report and project hours, the Division converts semi-monthly pay periods to a weekly average of hours as follows.

One full pay period – the total hours worked is divided by a factor of 2.15.

Two full consecutive pay periods – the total hours worked is divided by a factor of 4.3.

Partial Pay period – the total number of hours worked is divided by the number of days worked to obtain a daily average. The daily average is multiplied by the number of actual days worked and verified in a seven consecutive day period. The pay period must cover a minimum of one consecutive seven-day period.

The weekly average is entered into our tracking system for the report month.

Self-Employment:

An individual is self-employed if engaged in an enterprise for gain, either as an independent contractor, franchise holder, or owner-operator. This includes individuals working on a commission only, per-job or per-piece basis when hours are not supervised/tracked.

Note: If an individual is paid by the hour and actual time worked is used to determine pay, the individual is not considered self-employed.

The number of hours of self-employment counted toward participation and each month is determined by calculating the individual's gross earned income, less business expenses, divided by the federal minimum wage. A self-employed participant who states they are an independent contractor, franchise holder or owner-operator must complete, sign and submit a self-employment worksheet and provide substantiating documentation of the income and claimed expenses. The Division will report the number of participation hours indicated on the self-employment worksheet by dividing the net income (gross income less verified business expenses) by federal minimum wage, not to exceed 40 hours per week. Acceptable documentation may include quarterly/yearly income tax statements, business records, signed statements from individuals purchasing services, invoices and receipts. Determining participation hours in this manner is consistent with the Division's policy of determining income for TANF eligibility and benefit calculation. Self-employment hours may be projected. (See projection of income in Section I.1.b.)

Work in exchange for In Kind Income

Hours worked in exchange for in-kind income will be reported in this category when the following conditions are met: 1) the type of goods/services rendered in exchange for work meets the TANF definition of “in-kind” income and that income is budgeted when determining TANF eligibility and monthly benefit; 2) the work is assigned and hours verified in writing by the individual providing the in-kind income; and 3) the number of hours reported will not exceed the value of the in-kind income divided by the federal minimum wage.

The Division budgets the value of work performed in exchange for basic needs as income when determining eligibility and benefit amount. Basic needs are defined as food, clothing, recreation, personal incidentals, fuel for heating, cooking and water heating, electricity for refrigeration and lights, household supplies, medical chest supplies, and shelter. The Division requires a signed statement from the individual providing the in-kind income, attesting to the work being completed, the in-kind income provided and the value of the in-kind service/goods. Work in exchange for in-kind income may be projected. (See projection of income in Section I.1.b.)

Salaried Employees

When the employer tracks the hours of work completed in exchange for gain, hours of participation will be projected, as explained in Section I.1.b., based on frequency of payment.

When the Division verifies the employer does not track actual hours of work, the Division will report the number of participation hours by dividing the gross income by the federal minimum wage, not to exceed 40 hours per week.

Actual Hours

In all employment activities, the Division will verify and report actual hours when a participant’s employment activity hours are infrequent, irregular, and/or unpredictable.

c. *Verification*

- Wage stubs.
- Earnings Verification Form 2074 documenting actual hours worked and signed by the employer or their representative.
- Written documentation from the employer of actual hours worked. Must include date, participant’s name, actual hours worked for a specified period, wages and employer’s signature, address and phone number.
- Automated employee data warehouse services, such as The Work Number®, when available to the Division. Employers provide their payroll data to the vendor and refer all inquiries for payroll verification.
- Self-Employment – the participant must complete and sign the Self-Employment Worksheet and provide documentation for the income and expenses claimed.

Documentation may consist of quarterly/yearly income tax statements, business records, statements from individuals purchasing services, invoices and receipts.

- Documented phone call – a documented phone call will be accepted as verification if it is not possible to obtain a pay stub, the pay stub does not indicate the hours of work or if the information provided by the employer is incomplete. At a minimum, staff must document the date of the call, the name of the employer, the name and title and phone number of the contact person, the actual hours worked and for what period of time.

d. *Supervision – N/A*

2. Subsidized Private and/or Public Sector Employment

a. *Description of Services*

Subsidized employment in the Private or Public Sector is defined as employment for which the employer received a subsidy from TANF or other public funds to offset some or all of the wages and costs of employing a recipient. The recipient receives the same wages and benefits as an employee with no subsidy who performs similar work. The Division excludes on-the-job training programs with subsidies from this category.

At present, the Division does not financially participate in a subsidized employment program. TANF recipients may be placed in subsidized employment situations through the Division of Employment, Training and Rehabilitation (DETR), Universities (work study), Community Colleges (work study), or community agency providers. When TANF recipients are participating in subsidized employment opportunities, actual and/or projected hours of paid participation will be reported under this category. The Division will track and report hours of participation for private and public subsidized employment in the same manner but separately.

b. *Determining Approved Activity Hours*

Projecting Hours

The Division will report actual verified and documented hours of worked. The Division will project hours based on an average of actual hours for up to six months, providing the participant is scheduled to work a customary number of hours. When a change in hours is reported or becomes known to the agency, the Division will request verification and update the projection.

Unless otherwise specified, actual hours of participation will be averaged as follows:

Weekly or Bi-weekly Pay Periods:

- One full week of verified actual hours may be projected forward if the employer has signed a statement indicating the number of hours is expected to remain the same.
- Two or more weeks of actual hours may be averaged by totaling the number of hours worked and dividing by the number of weeks. If a week is not representative of what is expected in the future, it will be dropped or adjusted when determining the average.

The weekly average is entered into our tracking system for the report month.

Semi Monthly Pay Periods:

- Our tracking system is designed to capture hours based on weeks, with each week being a consecutive seven-day period. To accurately report and project hours, the Division converts semi-monthly pay periods to a weekly average of hours as follows.

One full pay period – the total hours worked is divided by a factor of 2.15.

Two full consecutive pay periods – the total hours worked is divided by a factor of 4.3.

Partial Pay period – the total number of hours worked is divided by the number of days worked to obtain a daily average. The daily average is multiplied by the number of actual days worked and verified in a seven-consecutive day period. The pay period must cover a minimum of one consecutive seven-day period.

The weekly average is entered into our tracking system for the report month.

Actual Hours – The Division will verify and report actual hours when a participant’s activity hours are infrequent, irregular, and/or unpredictable.

c. *Verification*

- Wage stubs.
- Earnings Verification Form 2074 documenting actual hours worked and signed by the employer or their representative.
- Written documentation from the employer of actual hours worked. Must include date, participant’s name, actual hours worked for a specified period, wages and employer’s signature, address and phone number.
- Automated employee data warehouse services, such as The Work Number®, when available to the Division. Employers provide their payroll data to the vendor and refer all inquiries for payroll verification.
- Documented phone call – a documented phone call will be accepted as verification if it is not possible to obtain a pay stub, the pay stub does not indicate the hours of work or if the information provided by the employer is incomplete. At a minimum, staff must document the date of the call, the name of the employer, the name and title and phone number of the contact person, the actual hours worked and for what period of time.

d. *Supervision* – N/A

3. On the Job Training

a. *Description of Services*

On-the-Job Training is defined as training in the public or private sector given to a paid employee while he or she is engaged in productive work and provides the knowledge and skills essential to the full and adequate performance of the job. This category is limited to

positions providing significant on-site training. An employer or other responsible party will supervise this activity daily.

The Division contracts with employers on a per recipient basis. The training period is negotiated with the employer based on their standard training period for like positions, not to exceed a 6-month period. The training program is stipulated in the individualized contract and differs by employer and type of occupation. As a general rule, the training will be of the same content and duration as any new employee would receive with the same employer for a like position. The Division may subsidize up to 50% of the wages received by the recipient during the training period.

On-the-Job Training sites are also available to our participants through DETR. While the employment subsidy comes from a different funding source, the two Divisions work closely together to coordinate services for common clients. When a recipient is participating in such an arrangement and there is a significant on-site training component to the arrangement, the hours will be reported under this activity category.

b. *Determining Approved Activity Hours*

Projecting Hours

The Division will report actual verified and documented hours of work. The Division will project hours based on an average of actual hours for up to six months, providing the participant is scheduled to work a customary number of hours. When a change in hours is reported or becomes known to the agency, the Division will request verification and update the projection.

Unless otherwise specified, actual hours of participation will be averaged as follows:

Weekly or Bi-weekly Pay Periods:

- One full week of verified actual hours may be projected forward if the employer has signed a statement indicating the number of hours is expected to remain the same.
- Two or more weeks of actual hours may be averaged by totaling the number of hours worked and dividing by the number of weeks. If a week is not representative of what is expected in the future, it will be dropped or adjusted when determining the average.

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Two full consecutive pay periods – the total hours worked is divided by a factor of 4.3.

Partial Pay period – the total number of hours worked is divided by the number of days worked to obtain a daily average. The daily average is multiplied by the number of actual days worked and verified in a seven consecutive seven-day period. The pay period must cover a minimum of one consecutive seven-day period.

The weekly average is entered into our tracking system for the report month.

Actual Hours – The Division will verify and report actual hours when a participant's activity hours are infrequent, irregular, and/or unpredictable.

c. *Verification*

- Wage stubs.
- Earnings Verification Form 2074 documenting actual hours worked and signed by the employer or their representative.
- Written documentation from the employer of actual hours worked. Must include date, participant's name, actual hours worked for a specified period, wages and employer's signature, address and phone number.
- Automated employee data warehouse services, such as The Work Number®, when available to the Division. Employers provide their payroll data to the vendor and refer all inquiries for payroll verification.
- Documented phone call – a documented phone call will be accepted as verification if it is not possible to obtain a pay stub, the pay stub does not indicate the hours of work or if the information provided by the employer is incomplete. At a minimum, staff must document the date of the call, the name of the employer, the name and title and phone number of the contact person, the actual hours worked and for what period of time.

d. *Supervision* – N/A

4. Work Experience

a. *Description of Services*

Work Experience is defined as a work activity that provides an individual with an opportunity to acquire the general skills, training, knowledge, and work habits necessary to obtain employment performed in return for welfare benefits. The purpose of work experience is to improve the employability of those who cannot find unsubsidized full-time employment.

Community Work Experience Program (CWEP) – The Division contracts with public and non-profit agencies to provide CWEP opportunities. The Division also sponsors participants. The contracts stipulate TANF participant receive training, perform work duties and are supervised daily in exchange for the work they do for the sponsoring agency. The participant's work history, aptitude and future employment/career goals are matched to the needs of the sponsoring agency prior to placement. The Division provides worker compensation coverage and pays the monthly premiums for participants in this activity.

Work Activities as Assigned in a Residential Treatment Program – Hours spent performing work-type duties as part of a residential treatment program for substance/alcohol abuse or

shelter program for victims of Domestic Violence may be counted as work experience in this category if the participant fulfills assigned, supervised and documented work responsibilities for the benefit of all the residents, such as preparing meals, housekeeping or organizing group activities. Participation in a work experience program is subject to FLSA regulations. Individuals will not be required to participate in these activities in excess of the number of hours derived by combining the TANF cash benefit and SNAP allotment and dividing by the applicable minimum wage.

The Division has adopted the “mini” Simplified SNAP to expand available hours for this activity and utilize the deeming provision permitted at 45 CFR § 261.31 and 261.32.

b. Determining Approved Activity Hours

The Division will report actual hours of participation.

CWEP worksite agencies sign the CWEP Memorandum of Agreement Form 2716-WA. The agreement stipulates daily supervision and documentation of attendance and hours on a time sheet. Documentation must be available in the case file to support all actual hours of participation claimed in the monthly NEON calendar.

In-house CWEP – Divisional staff supervise, track, and document participant hours.

Residential Treatment Facilities – the residential facility will supervise, and document all assigned work type duties and hours on a time sheet and are required to submit the time sheet to the Division. Documentation must be available in the case file to support all actual hours of participation claimed in the monthly NEON calendar.

c. Verification

- E&T CWEP Time Sheet, Form 2690-WA and Participant Evaluation Report, Form 2689.
- Sign-in/sign-out sheets and/or time sheets are used to track participant hours for in-house CWEP activities.
- Time sheets are completed and signed by a representative of the residential treatment facility certifying the activities were assigned and supervised.

NOTE: The Division uses a variety of time sheet forms and will also accept forms from other agencies and organizations if they meet documentation standards. At a minimum, time sheets must provide the participant’s name, type of activity, date of participation, actual hours of participation each day, and the name and signature of the person completing the form. An electronic signature is acceptable.

d. Supervision

- The CWEP agreement stipulates the supervisory responsibilities of the sponsoring agency and the expectation to provide training, work skills, and daily supervision.
- Participants engaged in in-house CWEP are assigned to a staff member that is responsible for providing training and daily supervision.

- Residential Treatment Facilities supervise and document all treatment and work activities performed by residents.

Case managers work closely with sponsoring agencies, treatment centers and in-house supervisors to ensure participants are engaged in meaningful activities and are gaining employable skills and behaviors. Case managers are available to assist in the resolution of work-place behaviors and/or conflicts.

5. Job Search/Job Readiness

a. *Description of Services*

This activity is defined as the act of seeking or obtaining employment and preparation to seek or obtain employment. This activity includes the time participants attend job clubs, job readiness classes, life skills training, and other similar programs aiding with applications, interviews, resumes, and other job search skills.

When determined necessary and a documented need for treatment or therapy by a qualified medical, substance abuse, or mental health professional exists, substance abuse treatment, mental health treatment, and/or rehabilitation activities may be counted in this category.

The Division will limit reporting participation hours in these activities to no more than 6 weeks, or 12 weeks when qualified as a needy state, in a 12-month rolling period with no more than 4 weeks consecutive per statutory provisions. A – ‘week’ - of job search/job readiness activity is defined as 20 hours of participation for a work-eligible individual that is a single custodial parent with a child under 6 years of age and 30 hours for all other work-eligible individuals. Six weeks of job search/job readiness assistance equates to 120 hours and 180 hours. Or, if the state has been determined a needy state, 12 weeks of job search/job readiness assistance equates to 240 hours and 360 hours. Program staff will monitor our states eligibility status as a – ‘needy state’ - and will not report participation in excess of the 6-week limitation if our status changes. OASIS is coded to count any week in which 1 or more hours of activity is entered/reported in this category toward the consecutive time limitations. Staff may use discretion in reporting hours under this time-limited category part-time or episodic participation and conserve those weeks for weeks when the participant will meet their work requirement. Only actual hours of participation will be reported. Participation is monitored and supervised by DWSS staff and verification of participation hours must be received prior to reporting hours in the NEON calendar. Hours of participation in the following activities are reported in this category:

Assessments – A variety of assessment tools are used by case managers and social workers to determine the participant’s employment readiness and identify barriers to obtaining and maintaining employment. Staff may document the hours spent with the participant in these activities in the case record and report actual hours in OASIS.

Examples of assessments include a job readiness screening (work history and identifying possible employment barriers like transportation, childcare, domestic violence situation), psycho-social assessment, TABE (math/reading test), Fetal Alcohol Affect Screening, alcohol and substance abuse screenings, occupation aptitude testing, vocational rehabilitation assessment, etc.

Counseling/Treatment (Domestic Violence, Mental Health, Substance Abuse) – When determined necessary and a documented need for treatment or therapy by a qualified medical or mental health professional exists, substance abuse treatment, mental health treatment, or rehabilitation activities are counted in this category. TANF recipients are screened for domestic violence, mental health, and substance abuse issues and referred to Divisional Social Workers if they declare or are suspected to have one or more of these issues. Social workers are licensed and trained to administer a variety of non-medical assessment tools to further substantiate a need for services. When indicated, recipients receive referrals to contracted providers. Mental health and substance abuse treatment providers are required to provide a recommendation for treatment and treatment plan if they concur the applicant has need of their services.

Note: Reporting domestic violence counseling participation is limited to counseling that constitutes mental health treatment.

Other rehabilitative services – Vocational Rehabilitation Services may be counted in this category. Example: An evaluation of mental/physical ability to perform different types of job duties for an individual that must be trained for a new occupation when no longer able to perform the job duties of their previous occupation. The provider will supervise and document all hours of participation in this activity and submit it to the Division. Documentation must be available in the case file to support all actual hours of participation claimed in the monthly NEON calendar.

Job Preparedness – This activity includes resume preparation, job clubs, practicing interviewing skills, working out the logistics of a job search plan (location of employers in relation to public transportation availability and childcare centers), instruction in workplace expectations, etc.

Job Search – This activity includes searching for job openings, applying with potential employers, and interviewing for positions. The State of Nevada has an interagency/community partnership network of JobConnect Career Centers. Job seekers enter their job experience and job skills into JobConnect’s information system, and the job seeker is able to search for job openings for which they qualify. Many major employers require online applications and the JobConnect Centers provide the computers and technical support for job seekers to email their resume and application to employers. The actual time spent registering in the system, searching for openings, obtaining referrals from JobConnect staff and applying online will be countable participation hours under this category.

- Life Skills – The Division contracts with life skill training providers on behalf of our participants.

b. *Determining Approved Activity Hours*

Actual hours of participation are reported in this category.

c. *Verification*

The time an individual participates in in-house assessments is tracked and documented by Division staff.

In the case of substance abuse treatment, participants are referred to a SAPTA (Substance Abuse Prevention and Treatment Agency) qualified alcohol/substance treatment agency for evaluation and treatment recommendations. Time sheets provide written documentation of the individual's participation in treatment. Hours are tracked and submitted by the treatment agency.

A qualified mental health professional is defined as a "Medicaid Approved Provider" of mental health services. The Division of Health Care Financing and Policy (DHCFP), which administrates the Medicaid services program in Nevada, establishes the certification and licensing standards. The mental health provider will be required to complete and sign an Essential Task Questionnaire and/or a report of Illness/Incapacity Form indicating the type, duration, and frequency of treatment and the type of activities the participant may be able to perform. Time sheets provide written documentation of the individual's participation in treatment. Hours are tracked daily and submitted by the treatment agency. Documentation must be available in the case file to support all actual hours of participation claimed in the monthly NEON calendar.

Job Preparedness Activities – participants will be required to maintain time sheets which must be signed by the contractors, instructors, advisors, mentors, and other responsible third-party individuals when participating in job preparation classes/clubs and provide these to their case managers. Documentation must be available in the case file to support all actual hours of participation claimed in the monthly NEON calendar.

Job Search – Participants will be required to keep a time sheet documenting where, when, and with whom they participated in these activities on a daily basis. Reportable hours will begin when the participant reports to their district office or to the first prospective employer and will end when the activity is concluded. Time traveling between prospective employers will be reported. Time spent at lunch or other breaks will not be reported. Staff will validate at least 2 random contacts reported each week. If the contact records are found to be valid the hours of recorded participation may be reported. If staff is unable to validate the recorded hours, the participation hours documented on the time sheet will not be reported. Staff will be available during all regular business hours to provide assistance and guidance for these activities. Documentation must be available in the case file to support all actual hours of participation claimed in the monthly NEON calendar.

Life skill providers will maintain daily attendance and hourly participation records on a time sheet and provide them to the case manager. Documentation must be available in the case file to support all actual hours of participation claimed in the monthly NEON calendar.

NOTE: The Division uses a variety of time sheet forms and will also accept forms from other agencies and organizations if they meet documentation standards. At a minimum, time sheets must provide the participant's name, type of activity, date of participation, actual hours of participation each day, and the name and signature of the person completing the form.

d. *Supervision*

- Case managers supervise self-directed job search and job preparedness activities.

- Contracted life skill training providers are responsible for supervising referred participants for the duration of the course. (Usually 2-4 weeks)
- Division social workers closely monitor the treatment plan and activities of participants receiving domestic violence, mental health, and substance abuse treatment/services.

6. Community Service Program

a. *Description of Services*

Structured programs and embedded activities in which NEON participants perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service programs are limited to projects that serve a useful community purpose in fields that include, but are not limited to, health, social service, environmental protection education, urban and rural development, welfare, recreation, public facilities, public safety, and childcare. Community service programs are designed to improve the employability of participants not otherwise able to obtain employment and must be supervised on an ongoing basis. The responsible party will have daily responsibility for oversight of the individual's participation. Daily, in-person contact with the participant is not necessary. The Division shall consider, to the extent possible, the prior training, experience and skills of a participant in making appropriate community service assignments.

Community service sites are developed specifically for each individual's skills and interests. These sites have been developed at schools, thrift stores, senior centers, libraries, food pantries, and community service agencies. These placements are expected to provide an opportunity for personal growth (interpersonal skills, conflict resolution, responsibility, work-like routine) for individuals that are not ready for employment. The participant, agency, and case manager mutually agree upon structured activities.

Participation in a community service program is subject to FLSA regulations. Individuals will not be required to participate in these activities in excess of the number of hours derived by combining the TANF benefit and SNAP allotment and dividing by the applicable minimum wage.

Exception: Court ordered community service is not subject to FLSA standards as the participant is not being asked to participate in exchange for a TANF benefit.

b. *Determining Approved Activity Hours*

Actual hours of participation are reported.

c. *Verification*

Time sheets are completed by a representative of the sponsoring agency to track daily participation. Documentation must be available in the case file to support all actual hours of participation documented in the monthly NEON calendar.

NOTE: The Division uses a variety of time sheet forms and will also accept forms from other agencies and organizations if they meet documentation standards. At a minimum, time sheets must provide the participant's name, type of activity, date of participation, actual hours of participation each day, and the name and signature of the person completing

the form. Electronic records provided by the sponsoring agency with the above information is acceptable.

d. *Supervision*

The case manager makes arrangements for a representative of the sponsoring organization to provide daily supervision.

7. Vocational Educational Training

(Not to exceed 12 months with respect to any individual)

a. *Description of Services*

Vocational educational training is defined as organized educational programs directly related to the preparation of individuals for employment in current or emerging occupations requiring training or education leading to a baccalaureate or advanced degree would be included in this section. Vocational educational training is limited to training programs that provide individuals with the knowledge and skills to perform a specific occupation.

Basic skills education or ESL may count under this category as long as it is a necessary or regular part of the vocational education training program. The instruction must be directly related to a specific occupation. Training must be provided by an educational or training organization. Vocational education provided in high school or leading to a certificate of high school equivalence (HSE) is not countable in this category.

Supervised homework time is counted in this activity. In addition, up to one hour of unsupervised homework time for each hour of class time may be counted.

English as a second language (ESL) instruction and adult basic education is not reported under this category, unless it is a mandated component of the vocational training curriculum. The following are 2 examples where ESL and adult basic education is embedded in the curriculum:

- Job Corp – a no-cost education and vocational training program administered by the U.S. Department of Labor that helps young people ages 16 through 24 get a better job, make more money, and take control of their lives. Participants have a wide range of career training options. In Nevada, the program requires young adults to pursue their high school diploma or HSE in conjunction with the vocational training.
- Culinary Training Academy – provides training for the service industry such as training for bus person, waiter, wine steward, kitchen prep, fry chef, chef, guest room attendant, shampoo porter, etc. Non-English speakers are required to complete workplace English as a component of their individualized training program to ensure they can understand employer instructions and communicate safety issues. Training programs range from 4-24 weeks depending on the program. Distance Learning – distance learning (as opposed to self-study) where students are not in the same physical location as the instructor is considered formal training under this activity. Most often, the student uses a computer and course software to participate in class. Students can have direct interaction with teachers and other students through internet access.

b. *Determining Approved Activity Hours*

Actual hours of participation are reported.

The case manager may document self-reported hours of participation in an educational institution if they have ongoing contact with the participant. Ongoing contact for reporting purposes is documented monthly contact which can be either in-person, by telephone, or electronic.

Monitored study sessions where hours of participation can be documented will be reported in this activity. One hour of unsupervised homework time may count for each hour of classroom or distance learning time. Hours cannot exceed the hours required or advised by the educational program.

No more than 12-months of Vocational Educational Training will be reported for any individual. OASIS is coded to count any month with 1 or more hours of participation entered/reported in this activity as one month toward the 12-month time limit. Staff will use discretion in reporting hours under this time-limited category when the household will not meet the work requirements

Verification

- Time sheets are maintained by the participant and/or instructor and are signed by the instructor or other authorized representative of the training institution or official school/institution time and attendance records.
- The case manager may document hours of participation if they are in ongoing contact with the participant and have adequate evidence the individual is making satisfactory progress.

NOTE: If the participant fails to demonstrate satisfactory progress at the end of an instructional period such as a quarter or semester, the case manager must subsequently make use of a heightened standard of verifying hours of education, i.e. requiring signed attendance sheets with third-party verification.

- Contracted training vendors submit attendance and participation hours via fax or email. Documentation must be available in the case file to support all actual hours of participation claimed in the monthly NEON calendar.
- The Division may make space available for participants to use for completing study/homework. This time will be monitored and documented by Divisional staff.
- For unsupervised homework, a statement from the educational program indicating the amount of homework required will be located in the file.
- In cases where the individual is participating in a distance learning program, via internet or video conferencing, documentation issued by the distance learning institution verifying that the student attended the session is acceptable verification. This documentation may include the attendance records or log-in and log-out records available on-line or in an electronic format.

NOTE: The Division uses a variety of time sheet forms and will also accept forms from other agencies and organizations if they meet documentation standards. At a minimum, time sheets must provide the recipient's name, type of activity, date of

participation, actual hours of participation each day, and the name and signature of the person completing the form.

c. *Supervision*

Daily supervision will be provided by the educational/training provider, which is monitored by Division staff. Or, monthly supervision by Division staff if they are in ongoing contact with the participant and have adequate evidence the individual is making satisfactory progress.

The Division may make space available for participants to use for completing homework or studying.

8. Providing Child Care Services

a. *Description of Services*

Providing childcare to enable another TANF recipient to participate in a community service program as defined in #6 above.

NOTE: The Division has not developed a qualifying childcare program. The Division continues to consider this as an option for the future and will amend the plan if a program is developed.

9. Job Skills Training Directly Related to Employment (non-core)

a. *Description of Services*

Training or education for job skills required by an employer to provide an individual with the ability to obtain employment or to advance or adapt to the changing demands of the workplace. The case manager must document the employment requirement and purpose for training.

The Division does not develop specific programs/services in this category but is able to access training opportunities provided by employers, technical schools, universities, and community colleges via individualized training contracts with participants and/or the training institutions. Types of training reportable under this category include:

- Vocational education training extending beyond the allowable 12-month limitation.
- Basic skills and remedial training for adults when focused on the skills needed for employment.

b. *Determining Approved Activity Hours*

Actual hours of participation are reported.

Monitored study sessions where hours of participation can be documented will be reported in this activity. Up to 1 hour of unsupervised homework time for each hour of class time may be counted for participation in this activity. Time counted for participation cannot exceed the hours required or advised by the education program.

c. *Verification*

Time sheets are maintained daily by the participant and/or instructor and are certified by the signature of the instructor or other authorized representative of the training institution (school or vendor) to verify official time and attendance records. Documentation must be available in the case file to support all actual hours of participation claimed in the monthly

NEON calendar.

d. *Supervision*

Daily supervision will be provided by the educational/training provider and monitored by Division Staff.

The Division may make space available for participants to use for completing homework and/or studying. This time will be monitored and documented by staff.

10. Education Directly Related to Employment (non-core)

a. *Description of Services*

Education directly related to employment is defined as education related to a specific occupation, job, or job offer in the case of an adult participant that has not received a high school diploma or HSE. The case manager must document the occupation, job, or job offer for which the participant is receiving training. Examples of training that may be reported in this category include:

- Adult Basic Education
- English as a Second Language (ESL)
- High School Equivalency (HSE)

b. *Determining Approved Activity Hours*

Actual hours of participation are reported.

Monitored study sessions where hours of participation can be documented will be reported in this activity. Up to 1 hour of unsupervised homework time for each hour of class time may be counted for participation in this activity. Time counted for participation cannot exceed the hours required or advised by the education program.

c. *Verification*

Time sheets are maintained daily by the participant and/or instructor and are certified by the signature of the instructor or other authorized representative of the training institution (school or vendor) to verify official time and attendance records. Documentation must be available in the case file to support all actual hours of participation claimed in the monthly NEON calendar.

d. *Supervision*

Daily supervision will be provided by the educational/training provider and monitored by Division Staff.

The Division may make space available for participants to use for completing study/homework. This time will be monitored and documented by staff.

11. Satisfactory Attendance at Secondary School or in a HSE Program (non-core)

a. *Description of Services*

Regular attendance, in accordance with the requirements of the secondary school or course of study, at a secondary school or in a course of study leading to a certificate of high school equivalence, in the case of a teen work-eligible individual that has not completed secondary

school or received such a certificate. The educational/training institution defines regular progress.

b. *Determining Approved Activity Hours*

Actual hours of participation are reported.

Monitored study sessions are reported. Up to one hour of unsupervised homework time for each hour of class time may be counted in this activity. NOTE: Total unsupervised homework time counted for participation cannot exceed the hours required or advised by an educational program.

c. *Verification*

- Time sheets maintained daily by the participant and/or instructor and certified by the signature of the instructor or other authorized representative of the training institution or official school time and attendance records. Documentation must be available in the case file to support all actual hours of participation claimed in the monthly NEON calendar.
- For unsupervised homework, a statement from the educational program indicating the amount of homework required should be located in the file.
- If a participant is attending high school, a written statement from the school regarding attendance.

d. *Supervision*

Daily supervision will be provided by the educational/training provider and monitored by Division staff.

The Division may make space available for participants to use for completing homework and/or studying. If time exceeds the number of hours required or advised by an educational program it must be monitored and documented by staff.

II. HOURS ENGAGED IN WORK

1. Excused Absence

Holidays – Work-eligible individuals who are unable to participate in an unpaid activity due to one of the following holidays may be credited for the hours they would have otherwise been scheduled to participate.

1. New Year's Day
2. Martin Luther King
3. Presidents Day
4. Memorial Day
5. Independence Day
6. Labor Day
7. Nevada Day (Observed on the last Friday of October)
8. Veterans Day
9. Thanksgiving Day
10. Christmas

Excused Absence –Participants will be allowed up to 80 hours of excused absence from unpaid work activities within a rolling 12-month period. This rolling period begins October 6, 2008. No more than 16 hours of unpaid excused absences will be allowed in a work participation rate (WPR) report month. Unpaid excused absences are allowed on a case-by-case basis, providing the recipient follows the supervisor’s policy for reporting the absence and the reason for the absence would be commonly acceptable to an employer. Examples of acceptable reasons: illness, illness of a child/family member, death of a family member, doctor/dentist appointments, job search, parent-teacher conferences, jury duty, and court ordered activities. Short periods of treatment for substance abuse, mental health, or rehabilitation activities can be counted under this category. Only the hours the participant was scheduled to work will be allowed as excused and reported under this category. Whether to grant an excused absence is in the Division’s sole discretion and is not an entitlement of the participant.

2. FLSA Deeming

The Division has adopted a “mini” Simplified Food Stamp Program to expand available hours for this activity and utilize the deeming provision permitted at 45 CFR §§ 261.31 and 261.32.

Deeming:

When deeming core hours, the Division bases the hours of participation on the monthly TANF and SNAP benefit divided by the greater of the federal or state minimum wage. If the individual participates up to the maximum number of hours allowed under FLSA limitations and it is less than 20 hours, the Division will report deemed hours to bring the total hours of participation for the activity up to 20 core hours; and in the case of a two-parent household the Division will report 2P deemed hours to bring the total hours of participation for the activity up to 30 core hours. If the participant does not work up to the maximum number of hours allowed, only the actual hours of participation will be reported.

3. Domestic Violence Waivers

(45 CFR Ch. II Part 260 Subpart B)

A federally recognized good cause waiver must be established to waive work participation requirements. To be federally recognized the case manager must:

- a. Identify, and document, the specific program requirements that are being waived;
- b. Be granted appropriately based on need, as determined by an individual assessment by a person trained in domestic violence and redeterminations no less often than every six months;
- c. Be accompanied by an appropriate service plan (PRP) that:
 - i. Is developed by a person trained in domestic violence;
 - ii. Reflects the individualized assessment and any revision indicated by the redetermination, and
 - iii. Is designed to lead to work.

4. Work Engagement Timeframe

In compliance with the Social Security Laws Title 42 Section 402 [42 U.S.C. 602] (a)(1)(A)(ii) NEON participants are required to engage in work once the State determines the parent or

needy caretaker is ready to engage in work, or once the parent or needy caretaker has received assistance under the program for 24 months (whether or not consecutive) whichever is earlier, and consistent with the exemption for a single custodial parent with a child under age 6 that has proved that appropriate child care is unavailable, unsuitable, or unaffordable. TANF benefits will be terminated if a participant fails or refuses to participate in work activities as required, unless exempt.

III. WORK-ELIGIBLE INDIVIDUAL

1. Identifying Work-Eligible Individuals

The Division's TANF eligibility systems, NOMADS and AMPS, are programmed to identify all adults and minor child head-of-households. The systems treats minor parents that are not the head-of-household and not the spouse of the head-of-household as children. Policy requires staff to enter demographic data for all parents in the household regardless of their eligibility for the program. The employment and training case management system, OASIS, opens a case for each individual with a work-eligible code. Supervisors receive an automated list of the new cases each day, which are assigned to employment and training case managers.

The following individuals are excluded from the definition of work-eligible individuals:

- A. Minor parents who are not the head-of-household or the spouse of the head-of-household.
- B. Ineligible non-citizens.
- C. SSI and SSDI recipients.
- D. Parents caring for a disabled family member that is living in the home. For the purposes of this provision, the term 'disabled' is defined as any individual who is medically certified by a physician as requiring assistance for basic medical, personal, or safety needs. The physician is expected to estimate the anticipated duration of the temporary disability and staff are required to review the household circumstances and ensure parents are coded as mandatory when the disability criteria for the family member is no longer met. The term 'family member' is defined as any individual related by blood or marriage to a member of the TANF household.
- E. Members of a tribal TANF program are not in our system and will not be included in the WPR.

The following individuals are identified and coded as work eligible as indicated below:

- A. Intentional Program Violation (IPV) disqualified individuals – IPV individuals have always been included in Nevada's WPR as they are considered TANF recipients even though their household TANF benefits may be reduced by a pro-rata share.
- B. Sanctioned Individuals – the Division's policy on sanctions is to terminate assistance for the entire household, if a work-eligible individual is not cooperating with work requirements by the end of a conciliation period. During the conciliation period, individuals are eligible for assistance and included in the WPR.
- C. Disqualified Individuals – drug felons, fleeing felons, parole violators, and minor parents that are not meeting their school requirements for eligibility are disqualified

from TANF assistance. Work mandatory codes are established in NOMADS/AMPS for identifying these individuals for the purposes of eligibility.

Effective October 1, 2006, the Division has only one group of TANF households included in a Separate State Program (SSP). The group consists of non-qualified non-citizens, that are currently barred from federal assistance for 5 years from entry, but who are in a domestic violence situation and have successfully petitioned for residency under the Violence Against Women Act (VAWA). They are coded as work mandatory if they meet the definition of a work-eligible individual.

Correctly identifying “work-eligible individuals”, entering the correct participation hours into OASIS, and ensuring participation hours are verified and documented according to policy are review elements in case manager performance reviews, internal quality control (QC) reviews, and management evaluation reviews. Through the case reviews, any data discrepancies being identified will be corrected in the Federal TANF Database Reporting System (FTDRS) and transmitted to Health and Human Services. Structured Query Language (SQL) queries are executed to eliminate any data inconsistencies between two or more data elements. These queries include any data inconsistencies between ‘type of family’ and ‘work participation status’ data elements as well as other inconsistencies. Nevada also validates, corrects, and retransmits the corrected data inconsistencies that are reported on the inconsistency reports received from ACF on a quarterly basis. Any data discrepancies identified through the case reviews, audits, or SQL queries are corrected in the FTDRS and retransmitted to Health and Human Services.

2. Verification Procedures for Identifying Work-Eligible Individuals

NOMADS/AMPS is an on-line data entry system to a master database. All TANF, as well as, SSP-MOE cases reside in the master database including active, newly approved and closed cases. These cases are identified with aid codes to distinguish the child only cases, one-parent cases, and two-parent cases.

Nevada has an automated extraction process with built in logic to identify and extract TANF families from NOMADS/AMPS. These TANF families are included in the sample reporting month. Based on the Federal regulations’ description of work-eligible individuals, these cases are identified, and computer program logic is coded to include or exclude all work-eligible adult (or minor child head-of-household) family members. Work-eligible individuals are included in the sample extraction and transmitted on the FTDRS.

3. Capturing and Reporting of Work-Eligible Individual Data

Along with NOMADS/AMPS, the state also uses OASIS in capturing work-eligible and work-volunteer individual’s information. OASIS establishes a participation calendar for every work-eligible individual. Verified work activities (see Section 1, Approved Work Activities for Verification Processes) and activity hours are entered by DWSS staff. The participation calendar calculates and tracks the approved work activity hours, including excused absences, holiday and deemed hours, entered for each calendar month

IV. INTERNAL CONTROLS

This section addresses the internal controls for Nevada's TANF Data Reporting population in order to ensure a consistent measurement of the WPR.

1. Established Work Verification Procedures

Beginning in FFY07, Nevada's TANF Data Reporting unit implemented audits on case file documentation and system reviews in order to validate and ensure work verification regulations are being met. These audits consist of a sub-sampling from the TANF data report-month sample frame. The unit validates case file verifications against data input into Nevada's NOMADS/AMPS and OASIS computer systems. The OASIS system contains work participation information, including work activity records, activity hours, and supportive services payments used in calculating the WPR. DWSS staff validates employment matches using a web-based State Directory of New Hire program and quarterly income reporting called "Automated Nevada Server-based Reference System" (ANSRS) that interfaces with the Employment Security Division (ESD). Case circumstances are also validated to ensure Nevada is capturing and reporting on all work-eligible individuals. All hard electronic copies of case files and documentation used in work participation validation are stored for the duration of the mandated administrative period. (The mandated administrative period is defined as 3 years after submission of the final expenditure report for the Federal Fiscal year.) These files will be retained and made available for inspection by the Administration for Children and Families (ACF) and other auditors, as needed.

2. Data, Coding, Omissions, Computational and Compilation Errors

Nevada's automated extraction process from NOMADS and OASIS and NCCS (Nevada Child Care system) information imported into OASIS ensures we are capturing required TANF data reporting elements on a consistent basis. The data elements are extracted from these systems and built imported into the FTDRS and SSP-MOE Federal software. When necessary, field staff obtain data by researching the case files or through direct contact with the participant, employer, or other parties.

Monthly samples are monitored by performing case file and system audits to validate and ensure work verification regulations are being met. Work verification activities as defined in section I.5 are being met through these case file and system audits. If data validation problems are identified, these hours will not be reported unless a secondary verification validates the hours. Only verified and documented actual, or projected actual, hours of participation will be reported.

3. Electronic Systems and Programming Error Validation

Information System (IS) programmers staff code any required system changes in NOMADS/AMPS, OASIS, and/or NCCS. When required code changes are complete, IS system testers validate the system changes, before promoting to production, based on what is documented in the System Requirements Document (SRD). This validation includes creating a bed of test cases and manually calculating the WPR data prior to testing. When the test bed cases are entered in the system and reports are created, the automated results are compared to the manual results to validate accuracy. This ensures programming errors are being addressed and any computer system changes are being met.

4. Sampling and Estimation Techniques Employed in Data Validation

SAMPLING METHOD

The sample size requirements for active and closed cases in the twelve-month reporting period is specified in the TANF Sampling and Statistical Methods Manual, Section 1411, Sample size Requirement for the TANF Active Sample and Section 1412, Sample Size Requirements for the TANF Sample of Closed Cases as follows:

A. Active Cases

The minimum required annual sample size for the active TANF sample is 3,000 completed cases. The 3,000 cases must consist of at least 1,800 ongoing single-parent/child only cases, 600 two-parent, and 600 newly approved cases. Nevada will pull the minimum required annual sample size plus ten percent to take into account listed in error cases.

Nevada will pull 100% sample size for the SSP-MOE population due to the projected small sample size of qualified battered non-citizen cases.

B. Closed Cases

The minimum required annual sample size for the sample of closed TANF cases is 800 cases. Nevada will pull the minimum required annual sample size plus ten percent to take into account listed in error cases. The closed TANF cases will be a mixture of single parent, two-parent, and child-only cases.

Nevada will pull 100% sample size for the SSP-MOE population due to the projected small sample size of qualified battered non-citizen cases.

C. Stratification

The active TANF population will be stratified into three strata: All-Family (stratum code 88), Two-Parent (stratum code 80), and Newly Approved (stratum 81). Each month a random sample will be selected separately from (stratum 88, stratum 80, and stratum 81). These three separate samples constitute a stratified simple random sample for the active TANF population.

Nevada will pull 100% sample size for the SSP-MOE population due to the projected small sample size of qualified battered non-citizen cases.

SAMPLE SELECTION PROCEDURES

The following sample selection procedures will apply to TANF reporting unless otherwise noted.

Active Cases

1) Estimate Caseload Size for Each Stratum

The TANF monthly average number of cases for a stratum should be estimated on the basis of past caseload sizes and trends. The Division's Coordinator of Research and Statistics is responsible for these estimates. Typically, simple linear trend projection models are used for caseload estimates. However, any known circumstances, such as policy or economic changes that would considerably change caseload sizes, will be considered in making the estimate.

The average monthly caseload for each stratum will be estimated before the beginning of the annual sample period. The estimated average monthly caseload for stratum j will be denoted by N_j' .

2) Determine Sample Size for Each Stratum

The minimum required sample sizes of completed cases for the 3 active strata and closed strata are:

Stratum Type	Annual Completed	Annual Selected (assuming 10% drop rate)	Monthly Selected (n_j')
All Family Cases	1,800	2,000	167
Two-Parent Cases	600	667	56
Newly Approved Cases	600	667	56
Closed Cases	800	888	74

3) Compute Sample Interval for Each Stratum

The sample interval for stratum j (denoted by I_j) is obtained by dividing the estimated average monthly caseload for stratum j by its required monthly selected number, i.e., $N_j' \div n_j' = I_j$. The sample interval I_j is only to be used for deciding the number of sample cases to be selected from the j th stratum, not for selecting individual sample cases as in a systematic random sampling.

4) Select Monthly Sample

For each sample month, divide the actual stratum size for the j th stratum (N_j) by its sample interval obtained in (3) above, i.e., $N_j \div I_j = n_j$. This is the number of sample cases to be randomly selected from the j th stratum for the sample month.

Note 1: N_j' is the estimated average monthly caseload for the j th stratum. N_j is the actual caseload for the sample month for the j th stratum.

Note 2: Step (1) above is done only once before the sampling period (annually), unless correction for under-sampling is needed (see Section 5). Step (4) above is done monthly;

the actual monthly caseload for the j th stratum may vary from month to month, but the sample interval I_j remains the same throughout the year unless correction for under-sampling is needed.

Note 3: The monthly caseload for each stratum will be monitored closely. If the actual caseload for the j th stratum (N_j) is greatly different from the estimated average monthly caseload (N_j'), under- or over-sampling may have occurred. In such a situation, correction for under- or over-sampling may have to be taken. (see Section 5 below).

The above procedures provide for a self-weighting sample for the annual data for each of the 3 active TANF strata (88, 80, and 81).

In the month of June, the sample data will be re-evaluated to determine if the minimum sample size requirements are being met for the year. If any of the TANF strata do not meet the minimum required sample size, the sample interval will be changed/shortened to correct for under-sampling. If this occurs, a new stratum code with a new stratum code will be created and assigned to the new sample interval.

Cases may be selected into the sample for more than one month during the sampling period. When this occurs, the case information for the sample month will be reported each time the case is pulled.

Cases could also be selected into different strata within the same reporting month, i.e., a case pulled a TANF Closed and SSP-MOE Active. When this occurs, the appropriate case information will be reported for each stratum in different populations (namely, the TANF Closed and SSP-MOE Active).

Active cases are reviewed as receiving cash when the manual information is gathered and input. All cases identified with zero TANF grants are manually reviewed and if determined a case did not receive cash in the report month, it is listed in error.

Closed Cases

Procedures for sampling closed case are the same as for active cases, detailed above.

5) Correction of Over/Under Sampling

Over-Sampling

Nevada chooses not to correct over-sampling.

Under-Sampling

In the sample selection procedures subsection, a sample interval for each stratum, that depends on an estimate of the average monthly caseload and the drop rate for the coming year, is used to determine the number of sample cases to be selected for each coming month. It is recognized that erring on the side of underestimating the caseload size is helpful in avoiding under-sampling.

If the average monthly caseload and/or the drop rate for the coming year is not accurately estimated, or if the caseload considerably changes due to unforeseeable factors, the number of selected sample cases may be significantly less than what is required. In this situation, Nevada will opt to correct for under-sampling in the last quarter of the federal fiscal year. In June, the state will re-estimate the average monthly caseload for the remaining 3 months, calculate the number of sample cases that need to be selected to meet the requirement and re-compute a new

sample interval, which will be used to decide the number of sample cases to be randomly pulled from each of the remaining 3 months. This will only be done for the stratum that is likely to be under-sampled.

Each time a new sample interval is used for selecting samples, it automatically creates a new stratum, and a new stratum code will be assigned. For example, if an interval change is made due to under-sampling, for strata 88 and 81 for the last quarter, the stratum codes for the last quarter would change to 89 from code 88 and 82 from code 81 (a total of four active stratum codes for the year, namely 88, 81, 89, and 82). Nevada will provide ACF with the correct stratum codes and stratum sizes in Section 4 of the Data Report.

6) Estimation and Variance

The stratified random sampling in this plan is mainly to obtain data to estimate the Work Participation Rates (WPR), to profile/estimate recipients' characteristics, and, to meet the reporting requirements. There are different estimators that can be used to estimate the population parameters such as the mean, total, and proportion of population units that have certain characteristics. In this section, only 2 frequently used estimators and their variances will be provided.

1. Standard Estimator

$E1 = \sum_i^L W_i y_i$ where $W_i = N_i / N$; and $N = \sum_i^L N_i$, and y_i is the sample mean for the i th stratum, i.e., $y_i = \sum_j^{n_i} Y_{ij} / n_i$.

$E1$ is an unbiased estimator of the population mean (Y), and its variance is given as $V(E1) = \sum_i^L W_i^2 (1 - f_i) S_i^2 / n_i$ where $W_i = N_i / N$; $f_i = n_i / N$; and $S_i^2 = \sum_j^{N_i} (Y_{ij} - Y_i)^2 / (N_i - 1)$, the population mean square error of the i th stratum, which can be estimated from a sample.

Based on a sample, $E1$ can be used to estimate the population mean of a variable such as earned income, subsidized childcare, housing, etc. In combination with its variance, $E1$ can also be used to test a hypothesis of significant difference for this variable between two ethnical groups for example or make other statistical inferences.

Comment 1: In this estimator, if multiplying $E1$ by N on the right side of the equation, then we would estimate the population total.

Comment 2: If the sample is self-weighting, the $n_i = n * N_i / N$, where $n = \sum_i^L n_i$ and $E1$ becomes $\sum_i^L \sum_j^{n_i} Y_{ij} / n$, which is a simple sample mean (W_i disappears). Its variance $V(E1)$ becomes $((1 - f) / n) \sum_i^L W_i S_i^2$, where $f = n / N$; this is the variance if sampling is proportional. Both estimator and its variance become simpler; this is an advantage to having a self-weighting sample.

2. Combined Ratio Estimator

$E2 = \sum_i^L W_i y_i / \sum_i^L W_i x_i$ where $W_i = N_i / N$; y_i is the sample mean of Y_{ij} for the i th stratum, i.e., $y_i = \sum_j^{n_i} Y_{ij} / n_i$; and $x_i = \sum_j^{n_i} X_{ij} / n_i$.

$E2$ is not unbiased, but it is a consistent estimator of the population ratio Y/X . The bias diminishes as the sample size increases. Its variance is approximately given as: $V(E2) = (1/X^2) \sum_i^L (W_i^2 (1 - f_i) / n_i) (S_{y_i}^2 + R^2 S_{x_i}^2 - 2R * S_{xy_i})$ where $W_i = N_i / N$; $R = Y/X$ the

population ratio; $S_{y_i}^2 = \sum_j^{N_i} (Y_{ij} - Y_i)^2 / (N_i - 1)$ the population mean square of Y_{ij} for the i th stratum; $S_{x_i}^2 = \sum_j^{N_i} (X_{ij} - X_i)^2 / (N_i - 1)$; and $S_{xy_i} = \sum_j^{N_i} (X_{ij} - X_i) * (Y_{ij} - Y_i) / (N_i - 1)$ the population cross-product term for the i th stratum.

E2 can be used to estimate a population ratio and proportion (percentage). The Work Participation Rate estimate is a special case of E2 when Y_{ij} and X_{ij} are the indicator variables (i.e., assuming either 1 or 0 value).

Comment 1: If the Division multiplies E2 by the population total of the x-variable (X) on the right side of the equation, it would estimate the population total of y-variable (Y).

Comment 2: The small letters y and x indicate sample means/totals; and the capital Y and X are for the population or stratum means/totals.

V. VERIFICATION OF OTHER DATA USED IN CALCULATING THE WORK PARTICIPATION RATES

1. Nevada's Data Validation Procedures

NOMADS/AMPS contains the master files, benefit information, and eligibility information for all TANF and SSP-MOE cases. Information included in these files are case name, case number, monthly eligibility, and non-eligibility information, in compliance with the data reporting requirements.

OASIS contains work participation information, including work activity records used in calculating the WPR and NEON supportive services payments.

NCCS contains childcare assistance information that is imported into OASIS prior to the TANF data reporting extraction.

To fully extract information necessary for TANF data reporting, all three systems are utilized.

The case information for the data elements below are identified and extracted from NOMADS/AMPS or OASIS, after the NCCS data import into OASIS. The criteria used to ensure we are capturing these data elements are based upon Federal and State regulation requirements

Report month – Captured from NOMADS/AMPS. This is the date of the “sample” report month. Active TANF cases with a TANF cash benefit issued in the sample month and closed TANF that had a cash benefit issued in the prior month but not in the sample month are captured and reported in the report month.

Stratum – Nevada's stratums for TANF and SSP-MOE are predefined under the ‘Internal Control’s’ section of this document.

Case Number – The case number is the head of household's social security number. This number is validated by the case worker and the system match with social security. This information is extracted from NOMADS/AMPS.

Disposition – All of our sample cases have an auto default of ‘Data collection completed’ at the time data is extracted. After the sample case audit reviews, Division and ACF SQL queries and system validations are complete, it may be determined that the case is ‘Not subject to data

collection/listed in error'. Examples of cases listed in error are a case that was pulled into the incorrect stratum or a benefit was issued in a month when the case was closed.

Type of Family for Work Participation – Cases are identified based upon the Work Eligible Individual Indicator (WEII) codes. Adults having WEII codes of 1-5 are required to participate in work activities. Adults having WEII codes of 6 - 12 are the type of family for work participation is coded based on the WEII. This can be a 1 parent or 2 parent case for mandatory work participants or child only cases based on the WEII.

Amount of Food Stamp Assistance – This data is extracted directly from NOMADS/AMPS based on any SNAP allotment amounts received in the sample reporting month

Receives Subsidized Child Care – NCCS childcare data is imported into OASIS and is stored in an internal system table for data extraction purposes only. The total amount of subsidized childcare the recipient received in the report month

Family Affiliation Code – Data is populated based on the eligibility for TANF cash assistance of the household members, relationship codes, citizenship, and SSI income of the household members.

Non-custodial Parent Indicator – Nevada's default value for this field is 2 – No, not a non-custodial parent. Nevada does not provide assistance to non-custodial parents.

Date of Birth (Adult) – This date is validated by the case worker and is extracted from NOMADS/AMPS.

Relationship to Head-of-Household Case workers select the appropriate relationship code in NOMADS/AMPS when they have identified and validated the relationship of the household members to the head of household. These codes are mapped to the Federal codes for identifying the relationships to the head of household.

Parent with Minor Child –The identification of parental relationship is verified and entered into NOMADS/AMPS by the case worker.

Work-Eligible Individual Indicator – Below are the WEII codes Nevada applies or disregards:

Work-eligible:

1 – Yes, an adult (or minor child head of household) receiving assistance

Parent or needy caregiver receiving cash assistance for themselves.

2 – Yes, a non-recipient parent due to a sanction

Nevada closes a case for non-coop thus sanctions do not apply at this time.

3 – Yes, a non-recipient parent due to a time limit

Nevada closes a case if applicant exceeds the Federal or State time limits

4 – Yes, a non-recipient receiving SSI, SSDI, or Adult Program assistance (aid to the needy aged, blind and disabled in the Territories) or a recipient parent receiving SSDI; and State or Territory opts to include

Nevada does not opt to include these case types

5 – Yes, a non-recipient parent due to other reasons

Nevada uses this indicator for fleeing felons and drug convicted parents

Not Work-eligible:

6 – No, a non-recipient, but not a parent

These are Nevada's non-needy care taker cases or child only kinship cases

7 – No, an ineligible alien due to immigration status

These are Nevada's child only cases with an ineligible non-citizen adult(s)

8 – No, a non-recipient parent receiving SSI or Adult Program assistance (aid to the needy aged, blind and disabled) in the Territories

Nevada opts to include these adults and these cases are child only cases with the adult(s) receiving SSI)

9 – No, parent caring for a disabled family member in the home

Nevada is validating this family type and identifying them with a NEON code of 'I' in the NOMADS system.

10 – No, a parent receiving SSDI (and State or Territory opts to exclude)

Nevada is validating this family type and identifying them with a NEON code of 'S' in the NOMADS system.

11 – No, a non-recipient, non-custodial parent

Nevada does not opt to include these case types

12 – No, a deceased individual who died in a month preceding the report month and, due to State requirements to provide timely notification to the family before reducing the grant or other reasons (e.g., the family failed to report the death to the TANF agency), the family's grant for the report month included the deceased individual's needs

Nevada will validate these individuals through case audits.

Date of Birth (Child) – This date is validated by the case worker and is extracted from NOMADS/AMPS.

The above data elements are validated by performing case and system audits to ensure work verification regulations are being met.

2. Procedures Employed to Eliminate Data Inconsistencies

Structured Query Language (SQL) queries are executed on sample cases imported into the Federal TANF Data Reporting and SSP-MOE reporting databases to eliminate any data inconsistencies between two or more data elements. Nevada also validates, corrects and retransmits the corrected data inconsistencies that are reported on the inconsistency reports received from ACF on a quarterly basis.

Work Participation Status

A. Nevada's procedures to ensure that a family is not disregarded from the WPR for more than 12 months per lifetime based on being a single custodial parent with a child less than one year of age.

NOMADS/AMPS is programmed to capture and maintain the number of exemption months used by a single custodial parent with a child less than one year of age and alert the case manager when the lifetime limit has been reached.

OASIS capture work participation information, including work activity records and supportive service payments. All single parents with a child less than one year of age are required to sign the Single Parent 12-Month NEON Exemption form indicating whether they elect to take the exemption. The forms are maintained in the case file. These individuals are identified with an exemption code of 'E' in NOMADS/AMPS and OASIS. The Federal Work Participation Status code 01 is programmed to populate based on the above criteria.

- B. Nevada's procedures to ensure that a family is not disregarded from the WPR for more than three months in any period of 12 consecutive months based on a work-eligible individual's refusal to participate in work.

Nevada's TANF program is structured to not provide assistance based on a work-eligible individual's refusal to participate in work activities. The TANF case is terminated for non-cooperation.

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

- C. TANF Data Reporting computer system coding is in place to ensure that a single parent household deemed engaged in 20 hours of participation in approved work activities with a child under age six is captured and reported as a Work Participation Status code 17. SQL queries of the TANF Data Reporting and SSP-MOE Reporting databases are used to validate captured data.

This is to certify that Nevada's TANF Work Verification Plan dated May 2020 includes all the information required by 45 CFR 261.62(b) and accurately reflects the provisions under which Nevada will be operating upon Federal approval.



Robert Thompson, DWS Administrator