



# **Minnesota Work Participation Rate Documentation Review Annual Report**

## **Temporary Assistance for Needy Families (TANF)**

**Federal Fiscal Year 2013**  
(October 2012-September 2013)

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### ***Terminology Disclaimer***

*The terminology used to describe people we serve has changed over time. The Minnesota Department of Human Services (DHS) supports the use of "People First" language. Although outmoded and offensive terms might be found within this document, DHS does not endorse these terms.*

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## EXECUTIVE SUMMARY

Temporary Assistance to Needy Families (TANF) regulations included in the 2005 Deficit Reduction Act (DRA) legislation requires states to develop a work verification plan and monitor participants' engagement in work activities in order to verify hours of participation.

In fulfillment of the latter requirement, in each quarter of federal fiscal year 2013 (October 2012 to September 2013), Minnesota reviewed a sample of 68 cases submitted in federal Work Participation Rate (WPR) data reports and published quarterly reports of review findings. This FFY 2013 Annual Report provides an aggregate analysis of the year's four quarterly sample data and documentation review results. Key findings from the total sample are highlighted below:

- State staff reviewed 272 cases from 49 of Minnesota's 87 counties. Fifty-seven percent of cases were correct for documentation of hours and had no error findings.
- Forty-three percent of cases had at least one documentation error resulting from county financial and/or employment services activities.
- For MAXIS activities, the most common errors included discrepancies between documentation in the case file and what was recorded on MAXIS; failure to use the most current actual income/hours to calculate WB eligibility; and incomplete documentation of work hours. Addressing these common causes of errors alone can dramatically reduce the number of MAXIS errors by more than 50 percent.
- For employment services, common errors included hours recorded are inconsistent with documentation in the case file, missing employment services provider method of bi-weekly verification of job contact, no documentation that weekly check-in meetings occurred, and holiday hours incorrectly used or calculated. If these are addressed, errors can be reduced by more than 40 percent.
- The documentation reviews found that 33 of the 129 cases (26 percent) reported as meeting the WPR required hours did not have enough documented hours and should not have been reported in the numerator value of the WPR. In addition, seven cases were reported as not having enough hours to meet the WPR, but enough documented hours were on file but not entered on the system.
- Five percent of sampled cases (n=14) had reported hours but no documentation on file to support these hours. Of these 14 cases, 50 percent were reported as meeting the WPR required hours of participation.
- The sample included 72 non-countable (zero) WPR hour cases reported under TANF federal reports and are considered non-MAXIS/non-ES cases (no activity). The zero hour cases are in the denominator of the federal WPR, even though there are no countable hours for the review month. Among the 72 zero hour cases sampled, 60, or 83 percent, were confirmed to be zero hours for the month of review. For these cases, consecutive months as a zero hour case ranged from one month to 25 months.

- Forty-two percent (n=25) of zero hour cases with no documentation errors had no engagement hours coded for the review period. No engagement hours mean no countable or non-countable hours coded.
- Examining trend data from FFY 2008 to FFY 2013, cases incorrectly counted in the WPR numerator after documentation reviews declined from a high of 37 percent in FFY 2008 to a low of 21 percent in FFY 2012, but increased to 26 percent in FFY 2013.

It should be noted that some of the increases in correct cases were impacted by changes in the FFY 2012 sample compared to previous fiscal years, with the inclusion of zero-hour cases where the majority have no documentation errors but were reviewed for case management issues, as discussed later in this report. While there have been continuous efforts to reduce incorrect cases and activity errors, there is also room for improvement.

The Minnesota Department of Human Services (department) continues to disseminate information to assist county financial workers and employment services workers to correctly document and report participant activities. Each quarter, the department provides county-specific reports on case findings with tip sheets and other resources to better coach workers on the respective error findings, and information to improve overall documentation and reporting.

## Section I: Background

### Temporary Assistance for Needy Families Work Verification Requirements

The Temporary Assistance for Needy Families (TANF) Work Participation Rate (WPR) is the federally mandated work performance requirement for states that have a TANF program. Minnesota's TANF program is the Minnesota Family Investment Program (MFIP).

The WPR was established under the federal Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996, along with penalties and incentives for states. The federal Deficit Reduction Act of 2005 (DRA), also known as TANF Reauthorization, included changes to TANF Work Participation Rate rules.

TANF regulations require states to develop a work verification plan, and monitor participants' engagement in work activities to verify hours of participation.<sup>1</sup>

### Minnesota's Verification Process

The Minnesota Department of Human Services, Economic Assistance and Employment Supports Division (EAESD) is responsible for monitoring and reviewing statewide random samples of TANF cases submitted in federal WPR reporting each quarter.

Refer to [bulletin #12-03-01](#), "DHS Changes Statewide Reviews of Temporary Assistance for Needy Families (TANF) Cases," April 27, 2012, for more information on the review process.

"[The MFIP Employment Services Manual](#)"<sup>2</sup> (MFIP ES Manual) includes the MFIP Activity Daily Supervision, Documentation and Verification Guide in Appendix E. The guide shows documentation requirements for both MAXIS and Employment Services (ES) activities. The review process uses this primary resource as guidance in determining if case file documentation and verification meet federal requirements. The review examines financial and employment services files, and supporting documentation of hours for cases in the selected review month.

### Sample Selection

In FFY 2013, DHS staff reviewed a quarterly statewide random and stratified sample of 68 TANF and Work Benefit (WB) cases that were reported in the federal WPR denominator for a month in the review quarter.<sup>3</sup> The sample was stratified to include 50 cases with at least one hour of core and/or non-core activity (eight of which are WB cases), and 18 cases with zero countable hours in one or more months in the review quarter. Each sample of 68 cases was selected from the preceding quarter after all data have been frozen for federal reporting purposes. In FFY 2013, 272 cases were reviewed.

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<sup>1</sup> The specific regulation pertaining to the documentation auditing process is 45 CFR 261.62 (b)(5).

<sup>2</sup> Available at: [http://www.dhs.state.mn.us/main/id\\_016957](http://www.dhs.state.mn.us/main/id_016957).

<sup>3</sup> The sample of 68 has a 90 percent confidence interval with 10 percent precision, assuming an error rate of 50 percent for a universe of 7,000 or greater. The universe included work eligible individuals excluding ineligibles.

## Case Types

Findings are presented in both aggregate and case type summaries. Case types are defined below:

### *Zero Hours*

Zero hour cases are in the denominator of the federal WPR and have zero countable WPR hours reported for the review month, but can have non-countable hours such as job search hours that are reported as “other” work activities (total hours are less than TANF required hours), and cases that only have assessment and other activities reported under the “other activity” category. Because the review focus is to verify documentation of federally reported WPR hours, most of the zero hour cases are considered correct for the review month for the purpose of this review. However, reviewers found case management problems for some cases. These problems could include financial worker failure to do an ES referral or doing it much later, lack of timely assessment for Family Stabilization Services (FSS), failure to sanction timely, as well as other case management and engagement issues.

### *Work Benefit*

The Work Benefit program (WB) is a monthly cash benefit for families who have exited the Diversionary Work Program or MFIP and are working a required number of hours with income below 200 percent of the federal poverty guidelines (FPG). To maintain WB eligibility, single caregivers with a child under age 6 must be employed at least 87 hours per month, or 130 hours per month with a child(ren) age 6 or older. In two-parent families, at least one of the parents must be employed 130 hours per month. As a WB reference resource, see Attachment D: “Tips for Work Benefit Cases.” WB cases are all MAXIS cases in the WPR numerator.

### *MAXIS-only*

Paid employment (regular and self-employment) are recorded and tracked on the MAXIS system. When cases are exclusively paid employment (no hours reported for employment services activities), they are referred to as MAXIS-only cases.

### *ES-only*

Cases with no paid employment are referred to as employment services-only.

### *MAXIS/ES*

Cases with both paid employment and employment services activities are referred to as MAXIS-ES cases.

## Review Process

Staff reviewed and copied file data onsite in Hennepin and Ramsey counties, while the other counties in the sample sent their TANF financial and employment services case files to the department.

During the review process, staff compared documentation in the case file for participant’s hours against what was submitted in federal TANF reports (based on data from MAXIS<sup>4</sup> and WorkForce One<sup>5</sup>). A

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<sup>4</sup> The MAXIS system is used by county financial assistance staff to enter MFIP eligibility information, including earned income and the number of hours of paid employment. The MAXIS system is also used by county financial assistance staff to enter eligibility information, including income and the projected number of paid employment hours for the (Minnesota) Work Benefit Program, which began Oct. 1, 2009.

case has no documentation error if all countable activities for the review month are correctly documented. If a case has both MAXIS and Employment Services countable activities for the review month, both must have the correct documentation to substantiate reported hours.

After case reviews are completed, a detailed report is generated for each case and sent to the respective county for analysis, which consists of a:

- Cover letter and review findings information sheet providing definitions and information on the summary and individual reports in the packet
- County summary (MAXIS summary, Employment Services summary, and Employment Services summary by provider)
- Case list with individual review results
- Detailed individual findings report for each case reviewed (MAXIS information and Employment Services information) that should be placed in each case file.

County agency staff are encouraged to examine the assessment and review determination of cases, and share the results with financial workers and the respective employment services provider. County agencies are encouraged to respond with challenges or questions regarding review findings. All feedback is reviewed; the final determination of each case is validated before the data is aggregated, analyzed and published in quarterly reports.

### **Review Findings Reports**

As in previous years, in FFY 2013, separate reports were issued with each quarter's sample, findings and results. This annual report aggregates data from the four quarterly reports in FFY 2013 and for comparison purposes within some sections, provides annual performance trends for the past several federal fiscal years.

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<sup>5</sup> Minnesota Workforce One (WF1) is a case management system used to track client activity in state-funded employment and training programs and many locally funded programs. The system is administered by the Minnesota Department of Employment and Economic Development (DEED) and used by state, county and private nonprofit service providers. The WF1 system is used by MFIP employment services providers to record participant employment services activity, including recording the hours of participation in non-paid employment services activities, in-kind work and school attendance for teen parents.



## Section II: FFY 2013 Review Findings

### A. County Representation of Sample

In FFY 2013, 272 cases were reviewed in the four quarterly samples (68 in each quarter). These cases were across 49 (56 percent) of Minnesota's 87 counties. Forty-five percent of cases were from Hennepin and Ramsey counties, Minnesota's two most populated metropolitan counties that account for about a third of the state's population.<sup>6</sup>

Table 1: Number and Percent of Sampled Cases

County	Cases	Percent	County	Cases	Percent
Anoka	23	8.5%	Nicollet	6	2.2%
Becker	3	1.1%	Nobles	3	1.1%
Beltrami	5	1.8%	Olmsted	6	2.2%
Benton	2	0.7%	Otter Tail	2	0.7%
Blue Earth	4	1.5%	Pine	1	0.4%
Cass	4	1.5%	Polk	1	0.4%
Chisago	1	0.4%	Pope	1	0.4%
Clay	3	1.1%	Ramsey	50	18.4%
Cottonwood	1	0.4%	Redwood	1	0.4%
Dakota	17	6.3%	Renville	1	0.4%
Dodge	1	0.4%	Rice	1	0.4%
Douglas	2	0.7%	Scott	5	1.8%
Fillmore	1	0.4%	Sherburne	1	0.4%
Goodhue	3	1.1%	Sibley	2	0.7%
Hennepin	73	26.8%	St. Louis	9	3.3%
Hubbard	1	0.4%	Stearns	8	2.9%
Isanti	1	0.4%	Todd	1	0.4%
Itasca	3	1.1%	Wadena	1	0.4%
Kandiyohi	2	0.7%	Waseca	2	0.7%
Koochiching	3	1.1%	Washington	4	1.5%
Le Sueur	1	0.4%	Watonwan	1	0.4%
Lincoln	1	0.4%	Winona	1	0.4%
Mahnomen	1	0.4%	Wright	3	1.1%
McLeod	2	0.7%	Yellow Medicine	2	0.7%
Mower	1	0.4%	<b>Total</b>	<b>272</b>	<b>100%</b>

<sup>6</sup> Source: Minnesota State Demographic Center, 2012 Population Estimates

## B. Correct and Incorrect Cases by County

Of the 272 cases reviewed in FFY 2013, 156 (57 percent) had a correct case finding for documentation, and 116 (43 percent) had incorrect case findings. The number of cases with correct and incorrect documentation case findings by county is shown in Table 2.

Table 2: Correct and Incorrect Cases by County

County	Cases Sampled	Correct Cases	Incorrect Cases	County	Cases Sampled	Correct Cases	Incorrect Cases
Anoka	23	15	8	Nicollet	6	3	3
Becker	3	3		Nobles	3	2	1
Beltrami	5	5		Olmsted	6	4	2
Benton	2	1	1	Otter Tail	2	1	1
Blue Earth	4		4	Pine	1		1
Cass	4	1	3	Polk	1	1	
Chisago	1	1		Pope	1		1
Clay	3	1	2	Ramsey	50	28	22
Cottonwood	1	1		Redwood	1		1
Dakota	17	9	8	Renville	1		1
Dodge	1	1		Rice	1		1
Douglas	2	2		Scott	5	4	1
Fillmore	1		1	Sherburne	1	1	
Goodhue	3	3		Sibley	2	2	
Hennepin	73	42	31	St. Louis	9	5	4
Hubbard	1	1		Stearns	8	5	3
Isanti	1		1	Todd	1	1	
Itasca	3	1	2	Wadena	1		1
Kandiyohi	2	1	1	Waseca	2	1	1
Koochiching	3	2	1	Washington	4		4
Le Sueur	1		1	Watsonwan	1		1
Lincoln	1	1		Winona	1		1
Mahnomen	1		1	Wright	3	3	
McLeod	2	2		Yellow Medicine	2	1	1
Mower	1	1		<b>Total</b>	<b>272</b>	<b>156</b>	<b>116</b>
					<b>100%</b>	<b>57.4%</b>	<b>42.6%</b>

### C. Impact of Errors on the TANF Work Participation Rate

All 272 cases sampled in FFY 2013 were included in the federal Work Participation Rate denominator because each case contained a work-eligible individual (WEI). Of these, 129 (47 percent) were reported as meeting federal work requirements and reported in the numerator value of the WPR.

Of the 129 cases reported as meeting the federal work requirements, the documentation review found that 57 (44 percent) were correctly reported, 39 (30 percent) had errors but still met the federal work requirements (remained in the numerator value of the WPR), but 33 (26 percent) did not have enough documented hours and should not have been reported as meeting the required hours.

Among the 143 cases reported as not meeting required hours of participation (non-numerator cases), the review found seven with enough documented hours to meet the required hours and should have been reported in the numerator value of the WPR. A documentation review summary of numerator and non-numerator cases is shown in Table 3:

Table 3: Documentation Review Finding of Sampled Cases in WPR Report

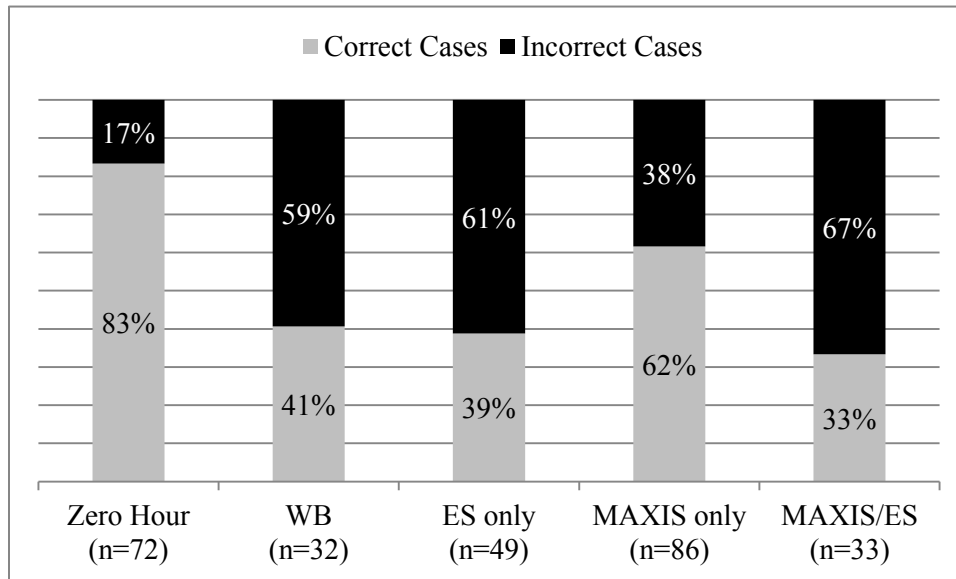
<b>Cases reported as meeting the required hours of participation (n=129)</b>	<b>Cases</b>
Numerator case is correct	57
Numerator case with errors (remains in numerator)	39
Numerator case with errors (should not be in numerator)	33
Subtotal	<b>129</b>
<b>Cases reported as not meeting the required hours of participation (n=143)</b>	
Non-numerator case is correct	99
Non-numerator case with errors (remains non-numerator)	37
Non-numerator case with errors (should be in numerator)	7
Subtotal	<b>143</b>
Grand Total	<b>272</b>

### D. Correct and Incorrect Cases by Case Type

For FFY 2013, 57 percent of the 272 sampled cases were correct and 43 percent were in error. Among the case types, MAXIS/ES and ES-only cases had the highest rates of incorrect cases at 67 and 61 percent respectively. A summary of case finding determination by case type is summarized and illustrated in Figure 1.

Figure 1: Correct and Incorrect Cases by Case Type

Case Type	Correct Cases		Incorrect Cases		Total	
	Number	Percent	Number	Percent	Number	Percent
Zero Hours	60	83.3%	12	16.7%	72	100%
Work Benefit	13	40.6%	19	59.4%	32	100%
ES-only	19	38.8%	30	61.2%	49	100%
MAXIS-only	53	61.6%	33	38.4%	86	100%
MAXIS/ES	11	33.3%	22	66.7%	33	100%
<b>Total</b>	<b>156</b>	<b>57.4%</b>	<b>116</b>	<b>42.6%</b>	<b>272</b>	<b>100%</b>



### E. Number and Common Errors in Incorrect Cases

Incorrect cases could have either MAXIS or ES errors, or both. The 116 incorrect cases shown in Figure 1 had a total of 176 errors; both MAXIS and ES had 88 errors each. The number of errors by case type is shown in Table 4.

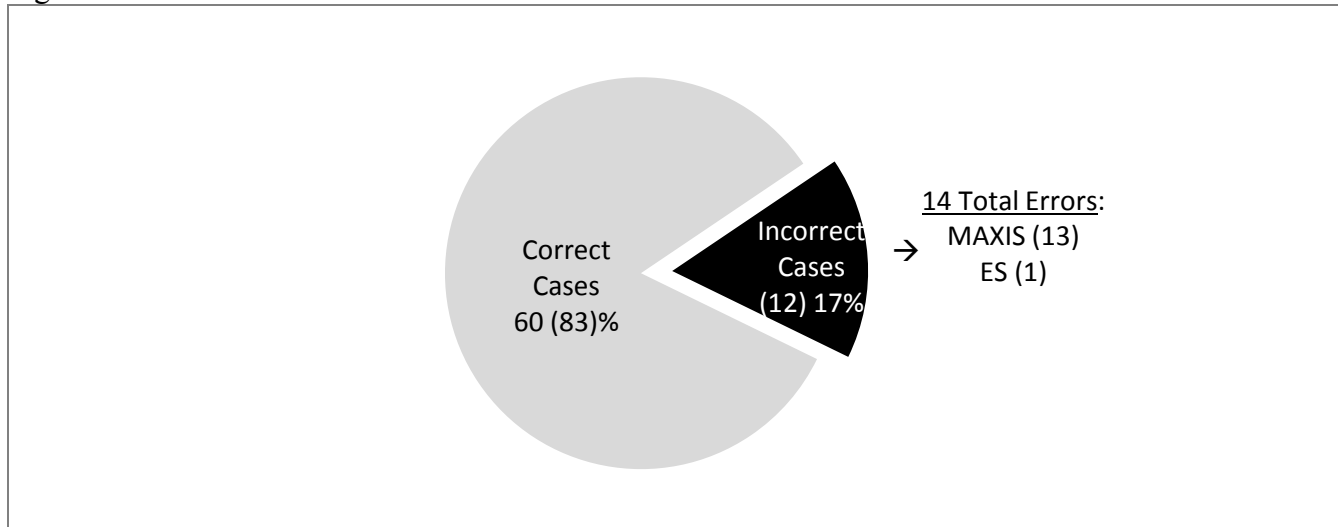
Table 4: Number of Errors in Incorrect Cases

Case Types	Incorrect Cases	MAXIS Errors	ES Errors	Total Errors
Zero Hours	12	13	1	14
WB	19	23	-	23
ES-only <sup>1</sup>	30	1	52	53
MAXIS-only <sup>2</sup>	33	39	3	42
MAXIS/ES <sup>3</sup>	22	12	32	44
Total	<b>116</b>	<b>88</b>	<b>88</b>	<b>176</b>

#### Zero Hour Cases (n=72)

Seventy-two zero hour cases (non-countable hours for WPR) reported under TANF federal reporting were reviewed in FFY 2013. As shown in Figure 2, 83 percent of the 72 zero hour cases were correct and 17 percent, or 12 cases, were incorrect. Among the 12 incorrect cases, there were 14 errors (13 were MAXIS and one was ES). Common errors were failure to code MAXIS panels for FSS eligibility and earned income documentation found in the case file, but hours were not recorded on MAXIS. See Attachments E and F for error details.

Figure 2: Correct and Incorrect Zero Hour Cases and Number of Errors



#### Case Management for Correct Zero Hour Cases

For the 60 zero hour cases that were considered correct for purposes of the documentation review, two-thirds (67 percent) were handled correctly by MAXIS and ES workers, but a third (33 percent) were handled incorrectly in the review month (although this did not constitute a documentation error). For the latter third, the most common reasons cases were handled incorrectly were ES activity open but no activity hours tracked, and failure to assess for FSS eligibility. Details on the cases handled correctly and incorrectly in the review month are provided in Table 5.

Table 5: How Correct Zero Hour Cases were Handled During the Review Month

Handled Correctly		Review Month Description of Case Management
40 (67%)	MAXIS 4	<ul style="list-style-type: none"> <li>• Child under age 1 exemption in effect for review month (2)</li> <li>• County/ES transfer in progress (1)</li> <li>• MFIP application pending in the review month (1)</li> </ul>
	ES 36	<ul style="list-style-type: none"> <li>• Case in process of being or currently sanctioned for the review month (22)</li> <li>• First month on assistance and no work activity assigned (8)</li> <li>• Job search hours reported as “other” for WPR (2)</li> <li>• Child under age 1 exemption in effect for review month (2)</li> <li>• County/ES transfer in progress—review month only (1)</li> <li>• Participant engaged in “other” activities in review month (1)</li> </ul>
Handled Incorrectly		
20 (33%)	MAXIS 2	<ul style="list-style-type: none"> <li>• Failure to refer participant to an ES provider or failure to do timely (2)</li> </ul>
	ES 18	<ul style="list-style-type: none"> <li>• Activity open, but no activity hours tracked (6)</li> <li>• Failure to assess for FSS eligibility (4)</li> <li>• Failure to sanction timely (3)</li> <li>• Failure of ES worker to act on case (3)</li> <li>• Failure to act on a referral from the county agency (2)</li> </ul>

**Length of Time as a Zero Hour Case and Case Management Engagement**

The main scope of documentation reviews was to focus on the review month and report findings about that month. However, the review identified the number of consecutive months a case had zero countable hours to provide a case management overview of these cases. Although some cases were handled correctly in the review month as discussed earlier, that may or may not be true for the other months in zero hour status for a given case. For the zero hour cases with no documentation errors (n=60), the cases remained zero hour ranging from one to 25 months. A distribution is presented in Table 6. A zero hour case can have non-countable hours which reflects some engagement in activities such as assessment, social services, etc. As shown in Table 6, 42 percent of cases with no documentation errors had no engagement hours coded for the review period. No engagement hours means no countable or non-countable hours coded.

Table 6: Consecutive Months as a Zero Hour Case and Case Management Engagement

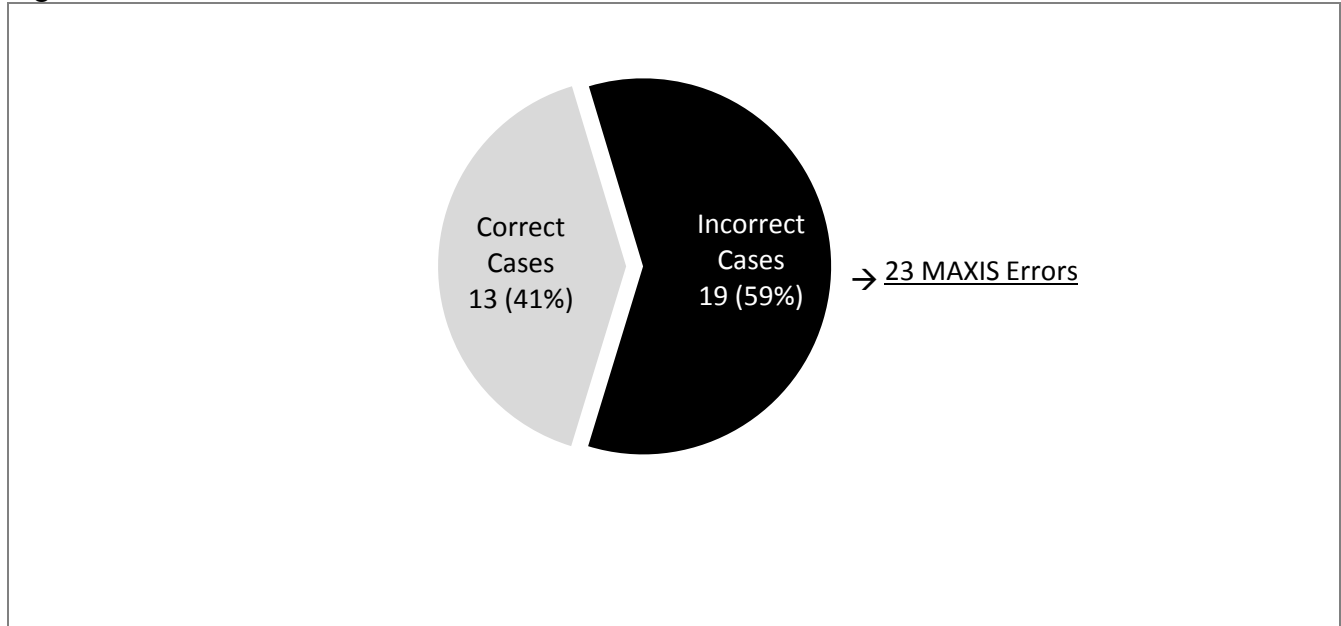
Months with Zero Hours	Cases	Type of Engagement	Cases	Avg. Months with Non-countable Hours
1-5 months	39 (65%)	No engagement	21	-
		Some engagement	18	1.8
6-12 months	16 (27%)	No engagement	2	-
		Some engagement	14	3.2
13-25 months	5 (8%)	No engagement	2	-
		* Some engagement	3	8.7
Total	60 (100%)	No engagement	25 (42%)	-
		Some engagement	35 (58%)	2.9

\* One case had two months of engagement, one seven months and the other 17 months; average 8.7.

**Work Benefit Cases (n=32)**

Of the 32 WB cases in the sample, 13 (41 percent) were found to be correct; 19 (59 percent) were incorrect with 23 MAXIS errors. The most common error was failure to use the most current actual income/hours to calculate work benefit eligibility. WB case findings and errors are illustrated in Figure 3. Refer to Attachment E for error details.

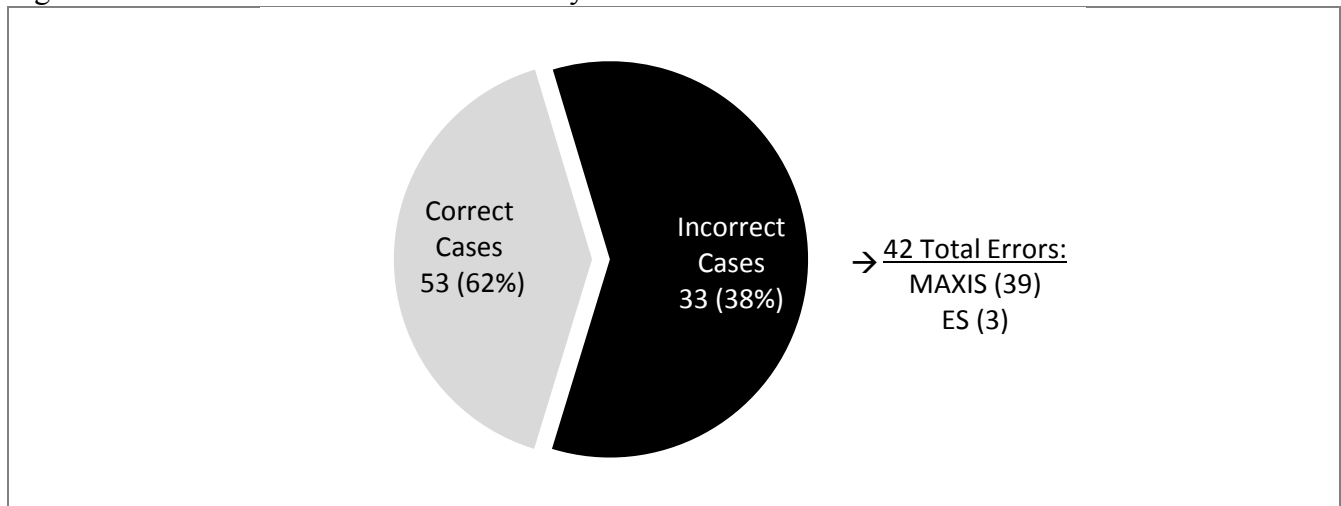
Figure 3: Correct and Incorrect Work Benefit Cases and Number of Errors



**MAXIS-only Cases (n=86)**

Of the 86 MAXIS-only cases, 53 (62 percent) had correct findings, with 42 having errors (39 were MAXIS and three ES). The most common error was hours recorded in MAXIS were inconsistent with documentation in the case file. Correct and incorrect MAXIS-only cases and number of errors are illustrated in Figure 4. See Attachments E and F for error details.

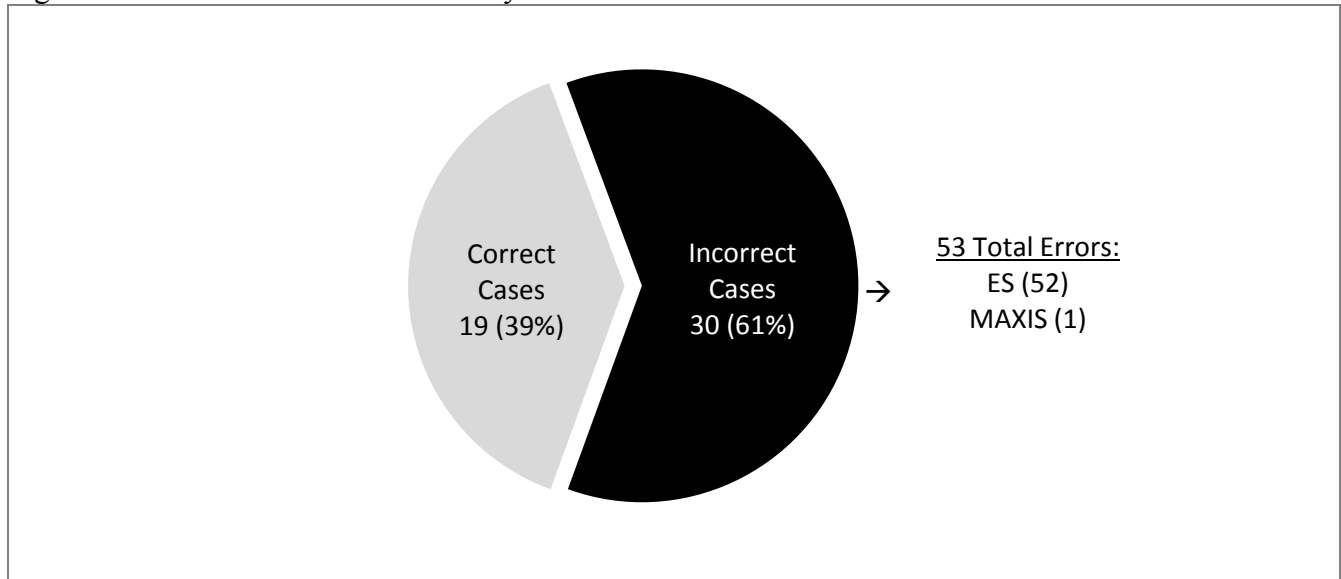
Figure 4: Correct and Incorrect MAXIS-only Cases and Number of Errors



**ES-only Cases (n=49)**

As illustrated in Figure 5, more than half of ES-only cases (61 percent) were incorrect with 53 errors; 52 errors were ES and one error was MAXIS. The most common errors were hours recorded were inconsistent with documentation in the case file and hours were recorded under the wrong activity.

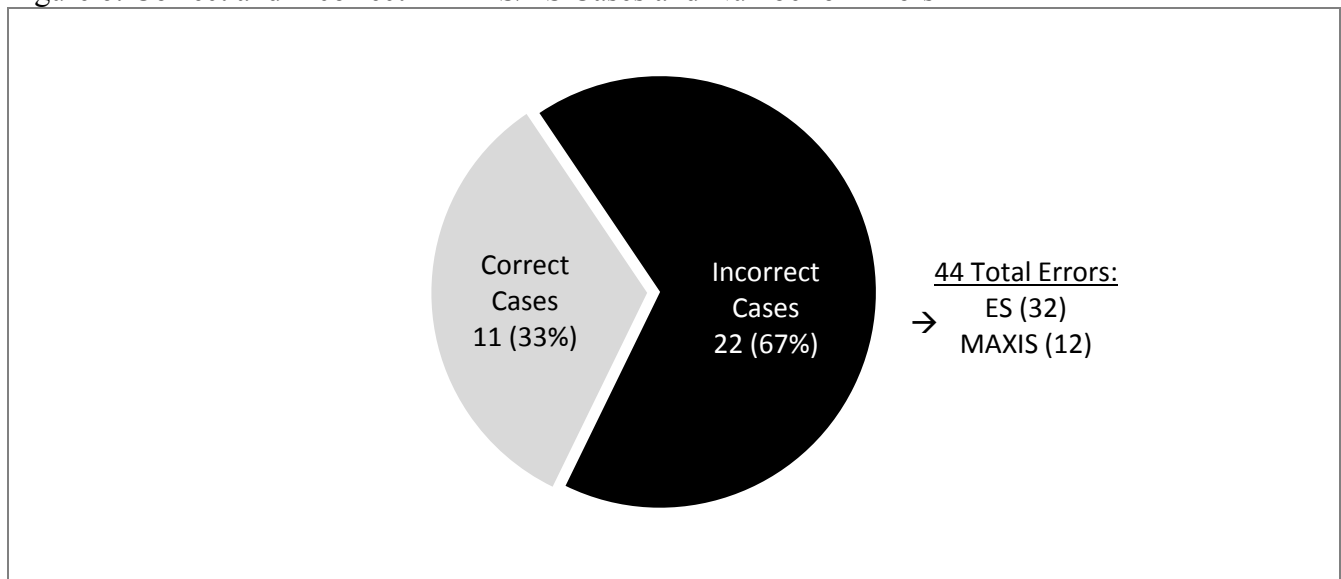
Figure 5: Correct and Incorrect ES-only Cases and Number of Errors



**MAXIS/ES Cases (n=33)**

As illustrated in Figure 6, 22 of the 33 MAXIS/ES cases (67 percent) were incorrect with 44 errors; 32 were ES and 12 MAXIS. The most common errors were missing employment services provider method of bi-weekly verification of at least one job contact, and no documentation that weekly check-in meetings occurred.

Figure 6: Correct and Incorrect MAXIS/ES Cases and Number of Errors





### F. Paid Work (MAXIS) and ES Activity Errors by Error Category

Across all paid work (MAXIS) activities, the two most common categories for errors were policy applied incorrectly, and data discrepancy. As noted earlier, the two most common error types in these two categories were failure to use the most current actual income/hours to calculate eligibility, and hours recorded were inconsistent with documentation in the case file.

For ES activities, the two most common categories for ES errors were documentation or verification, and data discrepancies. Common errors include: Missing bi-weekly verification, no documentation that weekly check-in meetings occurred, and hours recorded were inconsistent with documentation in the case file. MAXIS and ES activities by error category are summarized in Table 7 below; details are in Attachments E and F.

Table 7: Paid Work and ES Activity Errors (n=176) by Error Category

Error Category	MAXIS Errors		ES Errors		Total	
	Number	Percent	Number	Percent	Number	Percent
Documentation/verification	10	11%	47	54%	57	32%
Data discrepancy	26	30%	28	32%	54	31%
Policy applied incorrectly	34	39%	8	9%	42	24%
Computation	16	18%	3	3%	19	11%
Miscellaneous	2	2%	2	2%	4	2%
Totals	88	100%	88	100%	176	100%

### G. Cases with WPR Hours Reported but No Hours Verified

Five percent (14) of sampled cases had reported hours, but no documentation on file to support the hours. Of the 14 cases, seven (50 percent) were reported as meeting the required hours of participation for the WPR, six of which were ES cases.

# Section III: Trend Data

## A. Correct Cases

The percent of correct cases was increased from 37 percent in FFY 2008 to 63 percent in FFY 2012, but dropped to 57 percent in FFY 2013. Part of the higher increases in FFY 2012-13 could be attributed to the inclusion of zero-hour cases in the sample (federal WPR denominator cases), most of which were considered correct for WPR purposes, but are reviewed for case management and quality assurance purposes as discussed earlier in this report. Correct cases by FFYs are illustrated in Figures 7 and 8.

Figure 7: Percent of Correct Cases by FFYs 2008-13

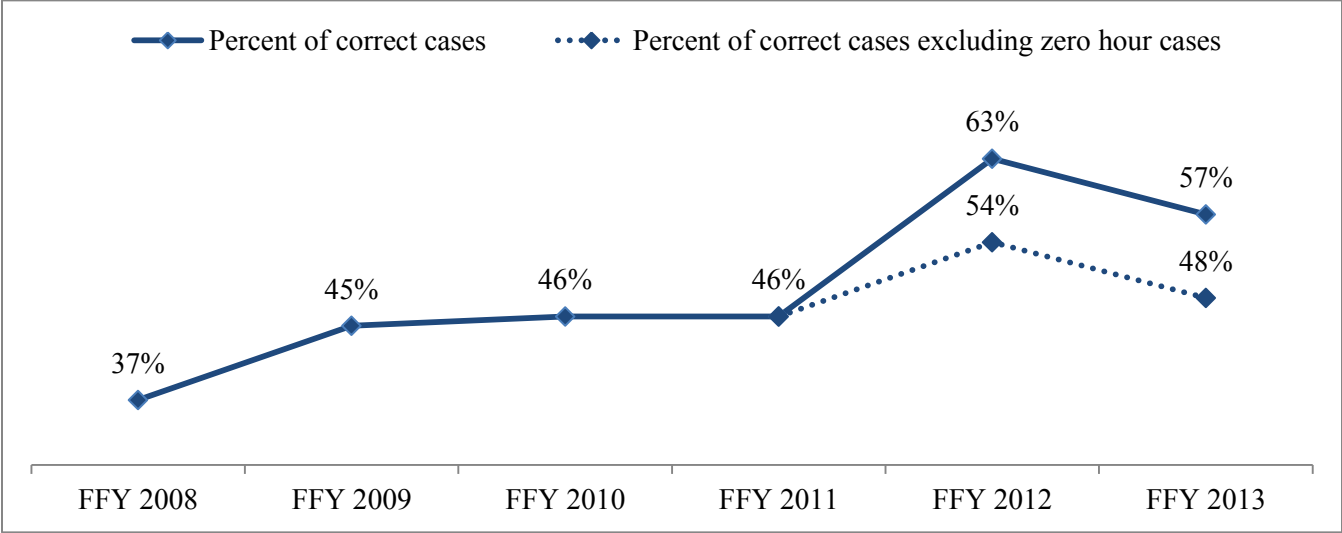
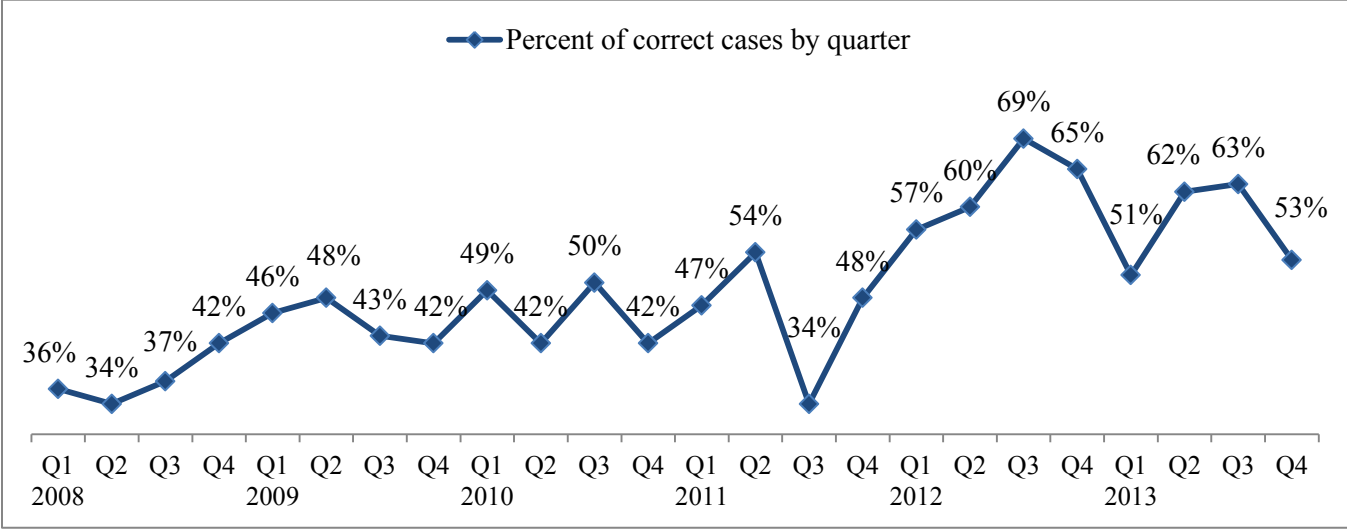


Figure 8: Percent of Correct Cases by Quarter in FFYs 2008-13



## B. Minnesota Performance on Federal WPR

Since 2005, Minnesota has met the federal WPR every year except 2007. In April 2014, the federal Administration of Children and Families (ACF) informed Minnesota that the state met its overall Work Participation Rate for FFY 2011. The status of Minnesota’s performance from ACF for FFYs 2012-14 is not yet known. Those results will be shared and published as they become available. A summary of Minnesota’s performance on meeting the federal WPR is shown in Table 8.

Table 8: Minnesota’s Performance on Federal WPR (FFY 2005-2014)

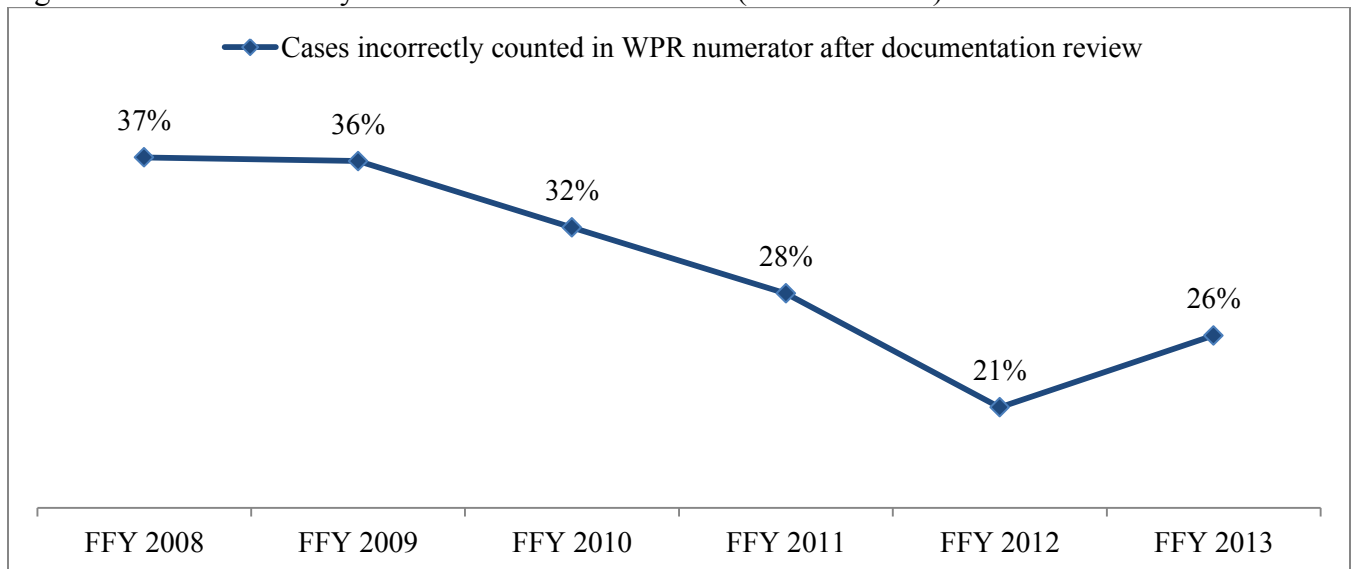
Federal Fiscal Year	Target	Adjusted Target (after Caseload Reduction Credit)	Work Participation Rate per ACF	Met the Federal WPR?
2005	50%	18.8%	28.9%	Yes
2006	50%	14.9%	30.3%	Yes
2007	50%	44.6%	28.1%	No
2008	50%	0.0%	29.9%	Yes
2009	50%	0.0%	29.8%	Yes
2010	50%	0.0%	40.2%	Yes
2011	50%	0.0%	43.9%	Yes
* 2012	50%	41.2%	Pending	Pending
* 2013	50%	36.8%	Pending	Pending
* 2014	50%	39.9%	Pending	Pending

\* Estimated adjusted targets until they are officially determined by ACF

## C. Impact of Documentation Review Findings on WPR Numerator

As illustrated in Figure 9, the percent of cases incorrectly counted in the numerator of the federal WPR based on documentation reviews declined from FFY 2008 to FFY 2012, but increased in FFY 2013; review of documentation found insufficient evidence to support inclusion of these cases in the numerator.

Figure 9: Cases Incorrectly Counted in WPR Numerator (FFYs 2008-13)



## **Section IV: Conclusion**

The TANF Work Participation Rate documentation review process continues to help clarify and refine policies and procedures for reporting and documenting work activities. This information, along with the statewide corrective action process, provides a platform to continuously improve documentation of WPR work, job search and workforce preparation activities.

Documentation reviews showed that cases incorrectly counted in the WPR numerator declined from a high of 37 percent in FFY 2008 to a low of 21 percent in FFY 2012, but increased to 26 percent in FFY 2013. Overall, county and Employment Services workers are improving documentation and correctly reporting participants' activities. However, case reviews also show that more can be done to minimize errors in MAXIS and ES activities.

For counties, the 2013 most common errors were similar to FFY 2012. These errors include the discrepancies between documentation in the case file and what was recorded on MAXIS, failure to use the most current actual income/hours to calculate WB eligibility, and incomplete documentation of work hours. Addressing these common errors alone can dramatically reduce the number of MAXIS errors by more than 50 percent.

For Employment Services, common errors include: Hours recorded are inconsistent with documentation in the case file, missing employment services provider method of bi-weekly verification of job contact, no documentation that weekly check-in meetings occurred, and holiday hours incorrectly used or calculated. If these are addressed, errors can be reduced by more than 40 percent.

The combination of errors led to the incorrect reporting of 33 cases (26 percent of numerator cases) in the federal FFY 2013 WPR data sample. There were also seven cases that were reported as not having enough hours to meet WPR required hours, but enough documented hours were found on file for these cases to meet WPR work requirements.

County financial and ES workers can reduce these errors by reviewing the specific causes of errors noted in this report and implementing recommendations in Attachments A-D. A review of case file documentation before data entry into MAXIS and Workforce One can minimize inconsistencies between case file and systems data. In addition, collaborative efforts and stronger communication between MAXIS and ES supervisors and workers, and between county financial and ES workers can go a long way to address common errors and improve overall documentation review results and Work Participation Rate reporting.

## Section V: Attachments

### Attachment A: Review Recommendations

Based on the MAXIS and ES errors found during documentation reviews, Minnesota Department of Human Services staff provides the following suggestions for county financial and Employment Services workers:

#### MAXIS:

- **Pay stubs.** Pay close attention to information on pay stubs and only record income and hours supported with actual documentation (pay stubs, employer statement, etc.) in the month payment was received.
- **Document Work Benefit projected income determination.** Single parent WB cases are included in the TANF Work Participation Rate, therefore, also on TANF Work Participation Rate documentation reviews. Use the most current income/hours on file at the time of WB approval, and clearly document what was used for calculations. If new information becomes available, reassess WB eligibility.

Use the “Combined Manual” and the “Tips for Work Benefit Cases” document (Attachment D) developed from TANF Work Participation Rate documentation review results, available at:

[http://www.dhs.state.mn.us/main/id\\_016956](http://www.dhs.state.mn.us/main/id_016956)  
[http://www.dhs.state.mn.us/dhs16\\_166327.pdf](http://www.dhs.state.mn.us/dhs16_166327.pdf)

#### Employment Services:

- **Require participants to provide school statement about recommended amount of study time.** Job counselors must only record documented study time hours when appropriate documentation is provided by a school.
- **Use the DHS school verification form.** DHS-2883 MDHS Request for Verification of School Attendance/Progress - English - 2-09  
<https://edocs.dhs.state.mn.us/lfsrver/Legacy/DHS-2883-ENG>
- **Do weekly check-in meetings and bi-weekly verification of one job contact.** Document in case notes that a weekly check-in meeting occurred. Do a bi-weekly verification of at least one job contact listed on the job search activity log and update the form accordingly.
- **Motivate participants to provide documentation as scheduled.** It is important that participants provide timely activity documentation. Documenting activities and timely submission are transferrable skills an employer may ask an employment counselor when acting as a reference for participants. Train participants, and use the Notice of Intent to Sanction (NOITS) tool when appropriate.

#### MAXIS/Employment Services:

- **Review the manual for policy information.** Review the appropriate manual to clarify correct policy and apply it to all cases.

MAXIS examples:

- WB—use recent income, do not average income and/or hours; WB requires participants’ paid hours are a minimum of 87 (youngest child less than 6 years), or 130 hours (youngest child age 6 or older), per month.
- Self-employment—review the Self-employment Handbook (link below) and the policy manuals.

[http://www.dhs.state.mn.us/dhs16\\_144585.pdf](http://www.dhs.state.mn.us/dhs16_144585.pdf)

ES example:

- Record hours in Workforce One under the correct activity.
- **Update county/provider forms and get appropriate signatures.** County and provider forms should contain all the needed data fields to ensure compliance with TANF documentation requirements. The form may need the clients', responsible individuals' and/or job counselors' signatures.
- Review DWP/MFIP Tip Sheets available on CountyLink:  
[http://www.dhs.state.mn.us/main/idcplg?IdcService=GET\\_DYNAMIC\\_CONVERSION&RevisionSelectionMethod=LatestReleased&dDocName=dhs16\\_161174#](http://www.dhs.state.mn.us/main/idcplg?IdcService=GET_DYNAMIC_CONVERSION&RevisionSelectionMethod=LatestReleased&dDocName=dhs16_161174#)

### **Other Recommendations**

#### **Corrective Action**

DHS staff recommend that all county agencies and ES providers review the TANF Work Participation Rate Documentation Reviews – Statewide Corrective Action Process, available as Attachment B.

#### **Training Opportunities**

- Attend state presentations and training sessions on the WPR, documentation and verification requirements, and DRA updates.
- County agencies and ES providers with incorrect review findings are encouraged to work with the DHS Transition to Economic Stability (TES) consultants to obtain supplemental instructions and technical assistance. Use the central email address to send in non-policy inquiries about DWP, MFIP and WB to TES: [dhs.dwp-mfip@state.mn.us](mailto:dhs.dwp-mfip@state.mn.us).

Examples of inquiries appropriate to send to the new email address include:

- Questions about allocations and allowable expenditures
- Questions about training or requests to provide training
- Questions about performance measures or documentation/verification requirements
- Process questions (i.e., paperwork for an Injury Protection Program claim)
- Unsure whether a question needs to be submitted through Policy Quest.

Questions about contracts should continue to be directed to the appropriate contract manager. Client-specific policy questions should continue to be submitted through Policy Quest. MAXIS and WF1 questions should be sent to the respective Help Desk. If unclear about where a question should be directed, use the above new email address and staff will redirect, as appropriate.

#### **Invitation to Comment on this Report**

DHS invites county agency staff and ES providers to comment on this report, and provide ideas of additional information that could be provided in future reports. Send comments and/or ideas to [paul.ramcharit@state.mn.us](mailto:paul.ramcharit@state.mn.us).

## Attachment B: Statewide Corrective Action Process

Minnesota Department of Human Services staff recommend that all county agency staff and ES providers take the following actions to improve documentation performance for TANF Work Participation Rate (WPR) documentation reviews.

Recommended actions:

- Use the MFIP Activity Guide in Appendix E of the MFIP ES Manual. This document is used for the TANF Work Participation Rate documentation reviews and will help workers understand documentation requirements, and determine if documentation is complete.
- Review individual case finding results with financial and ES staff who have the case, and ensure that each result gets filed in the appropriate county financial and Employment Services provider case file.
- Review this entire report, TANF Work Participation Rate documentation review reports for each sample, and the federal fiscal year report, with appropriate staff and management to gain a better understanding of the common causes that contributed to errors. Available at: [http://www.dhs.state.mn.us/County\\_Reports](http://www.dhs.state.mn.us/County_Reports)
- Review time sheets, activity logs, and other documents used to document/verify hours of participation to ensure forms meet all documentation requirements (refer to MFIP Activity Guide in Appendix E of the MFIP ES Manual, or the ES MFIP Activity Guide Tip Sheet in Appendix B of this report). Revise forms as necessary, or use the DHS recommended eDocs forms available at:
  - DHS-2883-ENG 2-09, MDHS Request for Verification of School Attendance/Progress: <https://edocs.dhs.state.mn.us/lfserver/Legacy/DHS-2883-ENG>
  - DHS-3336-ENG 8-08, Self Employment Report Form: <https://edocs.dhs.state.mn.us/lfserver/Legacy/DHS-3336-ENG>
  - DHS-5006F-ENG 1-13, Earned Income/Pay Period/Date Tracking Form–2013: <https://edocs.dhs.state.mn.us/lfserver/Public/DHS-5006F-ENG>
  - DHS-5784-ENG 10-11, MFIP/DWP Employment Services Weekly Job Search Activity Documentation Log: <https://edocs.dhs.state.mn.us/lfserver/Public/DHS-5784-ENG>
- Conduct periodic management/supervisor reviews of participant case files, case notes, and the corresponding data entered in the MAXIS and WF1 systems to ensure proper documentation and data entry.

Employment services providers – Use the Supervisory Case File Review – TANF Work Participation Verification Documentation Checklist for Unpaid Core and Non-core Activities form developed for Employment Services Providers as a tool to assist county agencies in reviewing Employment Services cases for documentation purposes. It is available on CountyLink, DHS Program Resources, and Employment Services page under the Tip Sheets section at:

[http://www.dhs.state.mn.us/dhs16\\_157830.pdf](http://www.dhs.state.mn.us/dhs16_157830.pdf)

Financial supervisor/worker – Use the Financial Case Review – TANF Work Participation Documentation, Verification and Coding Checklist form. This tool assists financial workers and supervisors to do TANF Work Participation Rate documentation reviews on their cases. A Checklist Guide was also provided to help direct users to additional information on using the form. To access the form and guide, use the link below to access CountyLink, DHS Program Resources – DWP and MFIP page under DWP/MFIP Online Resources section:

[http://www.dhs.state.mn.us/dhs16\\_146446.pdf](http://www.dhs.state.mn.us/dhs16_146446.pdf)

- Conduct county information sessions based on the MAXIS and Employment Services Activity Errors by Category and Cause, noted earlier in this report.
- Encourage workers to share strategies for working with participants to improve compliance with documentation requirements.
- Continue to use the summary and detailed data reports provided by the Department of Employment and Economic Development (DEED), available on its website at:

[http://www.positivelyminnesota.com/All\\_Programs\\_Services/Work\\_Participation-MFIP\\_TANF/index.aspx](http://www.positivelyminnesota.com/All_Programs_Services/Work_Participation-MFIP_TANF/index.aspx)

<https://mfipapps.positivelyminnesota.com/Login.aspx>



## Attachment C: MFIP Activity Guide Tip Sheet

This Tip Sheet is on CountyLink, Program and Resources, Employment Services, Tip Sheets  
page at: [http://www.dhs.state.mn.us/dhs16\\_156020.pdf](http://www.dhs.state.mn.us/dhs16_156020.pdf)\*

Activity	Documentation Needed	Notes
(Unpaid) work experience	<ul style="list-style-type: none"> <li>• Participant’s name</li> <li>• Dates covered (no less frequently than monthly)</li> <li>• Number of hours worked <i>each</i> day</li> <li>• Work site supervisor’s signature or other responsible individual, not Employment Services provider (ESP)</li> <li>• Name and phone number of work site supervisor (or other responsible individuals) must be on file or on activity log.</li> </ul>	Monthly hours must comply with Fair Labor Standards Act (FLSA)**
Community Service Programs (CSP)	<ul style="list-style-type: none"> <li>• Participant’s name</li> <li>• Dates covered (no less frequently than monthly)</li> <li>• Number of hours worked <i>each</i> day</li> <li>• Work site supervisor’s signature or other responsible individual, not ESP</li> <li>• Name and phone number of work site supervisor (or other responsible individuals) must be on file or on activity log</li> <li>• Statement of useful public purpose the placement provides</li> <li>• Statement of how job will enhance employability.</li> </ul>	Monthly hours must comply with FLSA**
Job Search Form <a href="#">DHS-5784</a> is mandatory to document job search activity	<p><i>Part 1 (Front of form)</i></p> <ul style="list-style-type: none"> <li>• Participant’s name</li> <li>• Dates covered (weekly)</li> <li>• Job contact information (date of contact, time spent on job contact, the position of interest, employer contact info, purpose and result of job contact)—all columns must be completed.</li> </ul> <p><i>Part 2 (Back of form)—On-site activity</i></p> <ul style="list-style-type: none"> <li>• Date</li> <li>• Time spent</li> <li>• Type of on-site activity (such as job club, structured job search, etc.)</li> </ul> <p>For agency use only section</p> <ul style="list-style-type: none"> <li>• Total hours (regular hours, on-site hours, holiday hours, other excused absence hours, chemical dependency/mental health and rehab services hours)</li> <li>• Weekly check-in (date and method used)</li> <li>• Bi-weekly verification of job contact (note which job contact verified and method used to verify).</li> </ul> <p>Signatures/dates</p> <ul style="list-style-type: none"> <li>• Both participant and ESP.</li> </ul>	

\***Family Stabilization Services** – See **Appendix E of [Employment Services Manual](#)** for complete Supervision, Documentation and Verification Requirements, including Family Stabilization Services (FSS) provisions. \*\* **Fair Labor Standards Act (FLSA)** – All work experience participants are considered employees under the FLSA. Participant would not be required to participate in unpaid work experience more hours than the monthly MFIP cash assistance amount plus the monthly food support amount divided by the federal minimum wage.

Activity	Documentation Needed	Notes
Providing child care to a CSP participant's child(ren)	<ul style="list-style-type: none"> <li>• Participant's name</li> <li>• Dates covered</li> <li>• Number of hours <i>each</i> day</li> <li>• Signature of the participant who is engaged in the community service program</li> <li>• Name and phone number of the participant engaged in the CSP must also be on the Activity Log or on file.</li> </ul>	Monthly hours must comply with FLSA.**
Vocational education	<ul style="list-style-type: none"> <li>• Participant's name</li> <li>• Dates covered (no less frequently than monthly)</li> <li>• Number of hours attended <i>each</i> day</li> <li>• Responsible individual's signature (not ESP)</li> <li>• Name and phone number of responsible individual must be on file or on Activity Log.</li> </ul> <p>***See note below about study time allowed for all school-related activities.</p>	Responsible individual's signature is not needed if faxed or emailed by the school.
Job skills training (includes ABE, GED, ESL, FWL)	<ul style="list-style-type: none"> <li>• Participant's name</li> <li>• Dates covered (no less frequently than monthly)</li> <li>• Number of hours attended <i>each</i> day</li> <li>• Responsible individual's signature (not ESP)</li> <li>• Name and phone number of responsible individual must be on file or on Activity Log.</li> </ul> <p>***See note below about study time allowed for all school-related activities.</p>	Responsible individual's signature is not needed if faxed or emailed by the school.
High school	<ul style="list-style-type: none"> <li>• Participant's name</li> <li>• Dates covered (no less frequently than monthly)</li> <li>• Number of hours attended <i>each</i> day</li> <li>• Responsible individual's signature (not ESP)</li> <li>• Name and phone number of responsible individual must be on file or on Activity Log.</li> </ul> <p>***See note below about study time allowed for all school-related activities.</p>	Responsible individual's signature is not needed if faxed or emailed by the school.
Online and distance learning documentation	<ul style="list-style-type: none"> <li>• The course/program log-in/log-out electronic record or</li> <li>• Conducted in a supervised setting (name, phone number and signature of responsible individual is required).</li> </ul>	

**\*\*\*Study Time Documentation** Voc. Ed, high school (HS), job skills, Adult Basic Education (ABE), General Equivalency Diploma (GED), English as a Second Language (ESL) and Functional Work Literacy (FWL)—With a statement from the school about recommended study time. One hour of unsupervised study time per class hour can be allowed; more than one hour per class hour needs to be supervised and requires a signature from responsible individual acknowledging study was supervised (cannot exceed the amount of study time advised by the school).

## Attachment D: Tips for Work Benefit (WB) Cases

The TANF Work Participation Rate Documentation Review team developed the following tips to help ensure that WB cases have the correct hours and income reported and documented.

### **Project Using Actual Income and Hours:**

For calculating initial and ongoing WB eligibility, use the most current income/hours on file. (*Do not average.*)

- WB policy states that the most current actual income/hours should be used to calculate eligibility. The actual income and hours should be coded on the prospective side of JOBS panel.
- Do not average or use multipliers to calculate income or hours for WB.
- Only use pay stubs from the most current month – do not combine pay stubs from two months. Example: Participant only sent one pay stub for the most current income to date, November 2013. Gross income was \$253.75 and total hours were 35. The participant is paid bi-weekly. Code the JOBS panel with \$253.75 for both checks to *project income and code 70 hours as the prospective hours.*
- Document clearly which income and hours were used to code the JOBS panel.

### **Updating JOBS Panel and Income Windows with New Income/Hours Information:**

**Supplemental Nutrition Assistance Program (SNAP)** – Use the JOBS SNAP Prosp Inc field to access the SNAP Prospective Income Calculation pop-up window. This window is an online calculator used to correctly calculate average hours and income per pay date, as well as prospective monthly income. DO NOT copy this income/hours data to the JOBS panel.

**Health Care (HC)** – Use the JOBS HC Inc Est field to access the HC Income Estimate window. Update this window with the average income per pay period anticipated from the income source listed on JOBS; the estimated monthly income is used in HC budgets for months at a time. DO NOT update the “Hrs” field on the JOBS panel and DO NOT copy the window income data to the JOBS panel.

**Work Benefit** – Use the JOBS panel when new income/hours information is received for WB. MAKE SURE to update the *prospective* data on the JOBS panel to reflect the most current income and hours data. (*Do not average.*)

- Some cases receive new information for HC and/or SNAP after the WB approval is done. If new information becomes available, WB eligibility should be re-assessed, and the most current hours should be updated on the JOBS panel using the WB method of calculating income and hours (do not average.) For HC/SNAP, each income window should be updated using the respective program policy calculation method for income and/or hours.
- Workers – Document clearly which income and hours were used to calculate ongoing WB eligibility.

### **Document, Document, Document!**

- For many cases, there is no information in case notes documenting how the WB income/hours were calculated.

### **Do Not Code Hours to Meet Work Participation Rate:**

- Some cases have 90 or 160 hours coded, which does not reflect the documented hours in the case file.

## Attachment E: MAXIS Error Details

MAXIS Error Category and Cause	ZERO HOURS	WB	Case Type MAXIS	ES	MAXIS/ES	Total Errors
<b>Documentation or Verification</b>						
Incomplete documentation of work hours--missing pay stub(s) or employer produced document	1		4	1	1	7
No pay stubs or other employer produced document submitted with the HRF		1	1			2
Other MAXIS documentation/verification error			1			1
Sub-total	1	1	6	1	1	10 (11%)
<b>Computation</b>						
Hours for different pay categories computed incorrectly--overtime, sick, vacation			1		2	3
Math error—simple addition errors			4		1	5
Math error—use of YTD totals incorrect			2			2
Other MAXIS computation error			2			2
Rounding error in the calculation of paid employment hours--TE02.08.170			4			4
Sub-total	0	0	13	0	3	16 (18%)
<b>Data Discrepancy</b>						
Earned Income documentation found in the case file but hours not recorded on MAXIS	4	1	2		1	8
Hours recorded inconsistent with documentation in case file		1	12		5	18
Sub-total	4	2	14	0	6	26 (30%)
<b>Policy Incorrectly Applied</b>						
Failure to code MAXIS panels for FSS eligibility	4		1			5
Failure to use the most current actual income/hours to calculate WB eligibility		11				11
Other MAXIS policy incorrectly applied error	1	1	2		1	5
Self-employment income incorrectly identified and budgeted as if person is an employee		1				1
Self-employment income incorrectly applied—no rolling average, no expenses allowed, etc.	1	1	3		1	6
WB income/hours incorrectly calculated using an average or multipliers		1				1
WB policy incorrectly applied error		3				3
WB policy instructs FW to enter income from 3rd or 5th paycheck but not the hours		2				2
Sub-total	6	20	6	0	2	34 (39%)
<b>Miscellaneous</b>						
Other MAXIS miscellaneous error	2					2
Sub-total	2	0	0	0	0	2 (2%)
<b>Total</b>	<b>13</b>	<b>23</b>	<b>39</b>	<b>1</b>	<b>12</b>	<b>88 (100%)</b>

## Attachment F: ES Error Details

ES Error Category and Cause	Case Type				Total Errors
	ZERO HOURS	MAXIS	ES	MAXIS/ES	
<b>Documentation or Verification</b>					
Missing client's signature on activity log/group attendance sheet stating log/hours are accurate			1	1	2
Missing ESP method of bi-weekly verification of at least one job contact			4	6	10
Missing information on the Job Search Activity Log			2	1	3
Missing one or more (but not all) time sheet(s) or activity logs(s) for hours reported in the review month.			2		2
Missing responsible individual's signature for supervised study time exceeding the 1 hour per class time hour			1		1
Missing signature of job counselor or other individual who oversees job search/job readiness activity			2	1	3
Missing statement from school specifying recommended amount of study time			4	1	5
Missing the actual hours of participation each day			1		1
Missing the name, signature, and/or phone number of person providing daily supervision/verifying hours			3	1	4
No documentation that weekly check-in meetings occurred			3	5	8
No time sheet (or activity log) or group attendance sheets found in case file			1	3	4
Other Employment Services activity documentation/verification error			2	2	4
Sub-total	0	0	26	21	47 (53%)
<b>Computation</b>					
Math error—simple addition errors			1		1
Rounding error (Employment Services Manual 9.47)			1	1	2
Sub-total	0	0	2	1	3 (3%)
<b>Data Discrepancy</b>					
Documented ES activity found in case file not recorded in WF1			2	2	4
Excused absence hours incorrectly used/calculated			1	1	2
Holiday hours incorrectly used/calculated		2	4	2	8
Hours recorded are inconsistent with documentation in case file			8	3	11
Other Employment Services data discrepancy error			2	1	3
Sub-total	0	2	17	9	28 (32%)
<b>Policy Incorrectly Applied</b>					
ES failure to notify county agency of FSS eligibility			1		1
Hours recorded under the wrong activity		1	5		6
Other Employment Services policy incorrectly applied error			1		1
Sub-total	0	1	7	0	8 (9%)
<b>Miscellaneous</b>					
Failure to notify FW that the participant's paid employment is subsidized and the type of subsidy				1	1
Other Employment Services miscellaneous error	1				1
Sub-total	1	0	0	1	2 (2%)
<b>Total</b>	<b>1</b>	<b>3</b>	<b>52</b>	<b>32</b>	<b>88 (100%)</b>

