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# Indiana's TANF Work Verification Plan

## Introduction

All procedures listed in this plan will be effective January 1, 2022. Amendments will be submitted when changes are contemplated.

## I. Countable Work Activities

### Unsubsidized Employment

*Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity.)*

Unsubsidized employment includes all paid employment that is not subsidized by TANF or any other public program, including self-employment.

*Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.*

The number of countable participation hours is determined by written evidence from the employer through pay stubs or other employer-produced documents substantiating the number of hours worked. All verifications are documented in the Indiana Eligibility Determination Services System (IEDSS) in the electronic case file. When verification of actual hours worked is obtained by phone, the information is documented in case notes and retained in the case file.

*Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.*

Verification of countable hours of participation is obtained through the receipt of pay stubs or other employer produced documents containing the participant's name, actual hours of participation, the name of the employer, and the name and phone number of the person verifying the hours. This includes recognized employment verification services such as the Work Number (TALX). These documents serve as verification of the actual hours worked and are retained in the participant's case file. When verification of actual hours worked is obtained by phone, the information is documented in case notes and retained in the case file.

*For self-employment, describe how the State counts and verifies the hours of participation. A State may not count more hours toward the participation rate for a self-employed individual than the individual's self-employment income (gross income less business expenses) divided by the Federal minimum wage. The State may also describe an alternative methodology to count and verify hours a client is engaged in self-employment.*

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Self-Employed individuals must verify gross earned income and expenses. Countable “hours” for self-employment are based on the gross income less 40 % of the gross income, or actual business expenses needed for producing a product or service, divided by the federal minimum wage. This is the same calculation used in determining the amount of countable self-employment income for TANF cash assistance eligibility. All documentation of expenses and income are retained in the case file.

*If a State intends to project hours of participation based on current, documented, actual hours, explain how it will make this projection.*

The State projects hours of employment for six months based on one full payment cycle/pay period that is representative of continuing circumstances. The hours are based on evidence received and verified by the employer. When there is a change in the participant’s actual verified hours, the hours are recalculated and a new six-month projection is applied. If the payment cycle/pay period does not represent continuing circumstances, actual hours are used rather than projecting hours. When the full pay cycle/ pay period represents weekly hours, the actual weekly hours are projected. When bi-weekly hours are represented, the hours are divided by 2 to arrive at the average weekly hours used for projecting. When semi-monthly hours are represented, the hours are divided by 2.15 and the result is projected. Because some weeks have more days in one month, the state multiplies the weekly average value by 4.3 to derive a monthly figure. Indiana uses this same logic for projecting income in determining TANF eligibility.

### **Subsidized Private Sector Employment and Subsidized Public Sector Employment**

*Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity.)*

Subsidized public sector or private sector employment includes paid employment for which an employer receives a subsidy from TANF or other public funds to offset the cost of some or all of the wages and costs of employing a participant.

*Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.*

The number of actual participation hours is determined by written evidence from the employer through pay stubs or other employer-produced documents substantiating the number of hours worked. When verification of actual hours worked is obtained by phone, the information is documented and retained in the case file.

*Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.*

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Verification of the actual number of countable hours of participation is obtained through the receipt of pay stubs or other employer produced documents containing the participant's name, actual hours of participation, the name of the employer, and the name and phone number of the person verifying the hours. This includes recognized employment verification services such as the Work Number. These documents serve as the verification of the actual hours worked and are retained in the participant's electronic case file in IEDSS. When verification of actual hours worked is obtained by phone, the information is documented and retained in the case file.

*If a State intends to project hours of participation based on current, documented, actual hours, explain how it will make this projection.*

The State projects hours of employment for six months based on one full payment cycle/pay period that is representative of continuing circumstances. The hours are based on evidence received from and verified by the employer. When there is a change in the participant's actual verified hours, the hours are recalculated and a new six-month projection is applied. If the payment cycle/pay period does not represent continuing circumstances, actual hours are used rather than projecting hours. When the full pay cycle/ pay period represents weekly hours, the actual weekly hours are projected. When bi-weekly hours are represented, the hours are divided by 2 to arrive at the average weekly hours used for projecting. When semi-monthly hours are represented, the hours are divided by 2.15 and the result is projected. Because some weeks have more days in one month, the state multiplies the weekly average value by 4.3 to derive a monthly figure. Indiana uses this same logic for projecting income in determining TANF eligibility.

## **Work Experience**

*Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity.)*

Indiana's Community Work Experience Program (CWEP) is designed to help an individual develop good work habits, transition into the work force, and enhance a recipient's resume. CWEP is intended for a recipient who is unable to find unsubsidized employment and would benefit from work experience that might lead to employment. Prior to placement, potential work experience providers are evaluated to match the participant with a position that is related to the participant's employment goals and the needs of the work-site sponsor. All work experience providers must sign an agreement with the State IMPACT Program. This agreement requires the worksite supervisor to maintain written verification of attendance, activity records, and weekly reports regarding the progress of each participant, and to submit a written evaluation of the participant's job performance at least monthly as prescribed by the State. This must include information regarding the start and end dates of the activity and the actual hours of participation. The work-site supervisor agrees to call the case manager when concerns arise. Work experience placements occur at any bona fide business, including private for-profit and non-profit organizations, as well as public agencies.

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Documentation of activities and hours of attendance are retained by the provider in the participant's case file and provided to the case manager for the participant's case file.

*Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.*

The number of countable participation hours is determined by the hours confirmed via written verification such as time sheets, sign in – sign out logs, and written and signed statements from the work experience site supervisor or designee substantiating the actual daily hours of participation. Documentation is submitted to the case manager at least monthly.

*Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.*

State or contracted staff verify the actual hours of participation by conducting monthly random reviews of daily attendance logs, activity records, and a review of the work experience provider's signed statements and monitoring processes to ensure all information is timely, accurate, and complete.

*Describe the methods of daily supervision for each unpaid work activity.*

To be consistent with the universally understood definition of supervision used in the workplace, Indiana requires the work experience site supervisor or designee to provide the supervision consisting of work related guidance and constructive criticism, mentoring, assignment of daily work, oversight of the work assignments, and the evaluation of work skills. This is documented as part of the formal agreement between the State IMPACT Program and the provider.

## **On-the-Job Training (OJT)**

*Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity.)*

On-the Job Training (OJT) means training in the public or private sector provided to a paid employee while he or she is engaged in productive work to gain the knowledge and skills essential to the full and adequate performance of the job. The training is supervised occupational-specific training provided for a specified period of employment under a contractual agreement and for which the participant is paid like any other employee.

While Indiana retains OJT as an IMPACT activity which could be utilized at a future date, there are currently no TANF recipients participating in OJT.

A referral to OJT takes place external to the existing IMPACT contractor structure.

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*Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.*

The number of countable participation hours is determined by written verification from the employer through pay stubs or other employer-produced documents substantiating the number of hours worked. When verification of actual hours worked is obtained by phone, the information is documented and retained in the case file.

*Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.*

State or contracted staff obtain the verification of the actual number of countable hours of participation through pay stubs or other employer produced documents containing the participant's name, actual hours of participation, the name of the employer, and the name and phone number of the person verifying the hours. When verification of actual hours worked is obtained by phone, the information is documented and retained in the case file.

*Describe the nature of training provided by employers that distinguishes this from subsidized employment.*

OJT incorporates training that is occupation-specific and distinguished from subsidized employment by the inclusion of a training plan as part of a contractual agreement. The training plan is a formal written program of the structured job training that provides a participant with instruction in work skills, general employment competencies, and occupation specific skills that will enable the participant to work toward self-sufficiency.

*If a State intends to project hours of participation based on current, documented, actual hours, explain how it will make this projection.*

The State projects hours of employment for six months based on one full payment cycle/pay period that is representative of continuing circumstances. The hours are based on evidence received and verified by the employer. When there is a change in the participant's actual verified hours, the hours are recalculated and a new six-month projection is applied. If the payment cycle/pay period does not represent continuing circumstances, actual hours are used rather than projected hours. When the full pay cycle/ pay period represents weekly hours, the actual weekly hours are projected. When bi-weekly hours are represented, the hours are divided by 2 to arrive at the average weekly hours used for projecting. When semi-monthly hours are represented, the hours are divided by 2.15 and the result is projected. Because some weeks have more days in one month, the state multiplies the weekly average value by 4.3 to derive a monthly figure. Indiana uses this same logic for projecting income in determining TANF eligibility.

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## Job Search and Job Readiness

*Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.*

Job Search and Job Readiness means the act of seeking or obtaining employment, preparation for seeking or obtaining employment including life skills training, substance abuse treatment, mental health treatment, or rehabilitation activities. Job Search and Job Readiness assistance activities must be supervised daily by the TANF IMPACT staff.

Job Search activities are designed to assist a recipient to immediately apply for and find work. Job Search activities include searching for job openings, completing job applications for potential employers, and interviewing for positions. Job Readiness activities are designed to prepare an individual for work by providing either:

1. Training specific to obtaining and maintaining employment such as Job Readiness workshops, resume writing or job application skills, interviewing skills, life skills training, and job coping skills that include problem solving exercises based upon employer expectations, or
2. Substance abuse treatment, mental health treatment, or rehabilitation activities for work-eligible individuals.

*Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.*

IMPACT staff and supervisors are responsible for the supervision and verification of daily attendance for recipients referred to them for Job Search/Job Readiness activities. Attendance records of classroom activities serve as documentation of participation for determining activity hours. Documentation is submitted to the State at least weekly.

The number of weekly Job Search hours is specified on the participant's Self Sufficiency Plan. The participant records the number of hours spent in Job Search activities each day on the Job Search Worksheet and submits it weekly to the case manager.

Case managers are responsible for verifying and documenting hours and activities in the IMPACT system. Case managers will randomly contact employers to verify contact information. All verification of Job Search activities is retained in the participant's IMPACT system electronic case file.

When hours of participation in Job Search cannot be verified, the case manager will document the hours in the case file, but not take any additional action. As always, unverified hours will not be reported.

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*Describe the methods of daily supervision for each unpaid work activity.*

For Job Search activities, the case manager provides daily supervision which includes responsibility for daily oversight of an individual's participation, although this does not necessarily mean that there will be daily contact with the participant. Daily supervision of a Job Search participant may include access to a case manager to whom the participant can report job search activities and progress, or seek additional guidance as needed before the next regularly scheduled contact. In-person contact between the case manager and the participant must be at least bi-weekly.

For Job Readiness activities, the instructor or staff offering the class, workshop, job club, or other program activity provides instruction and guidance to participants and provides daily supervision. An attendance log is maintained by the instructor/supervisor and signed by the participants.

For individuals undergoing substance abuse, mental health or rehabilitation services, the service (treatment) provider performs daily supervision for individuals participating in substance abuse or mental health treatment programs. Case managers maintain contact, as appropriate, with the medical or mental health professional while the participant is in treatment.

*If the State intends to count substance abuse treatment, mental health treatment and rehabilitation activities, describe the criteria to determine whether recipients are "otherwise employable" and establish the necessity of treatment or therapy. Describe the certification requirements for qualified medical or mental health professionals used in this process.*

Hours during which individuals undergo substance abuse treatment, mental health treatment, or rehabilitation activities will be considered as Job Search and Job Readiness activities provided such treatment is deemed necessary by a qualified medical or mental health professional. A licensed physician or psychologist determines whether an individual is in need of treatment or therapy. Completion of State Form 54717, "STATEMENT OF MEDICAL CONDITION FOR DETERMINATION OF PARTICIPATION IN THE IMPACT PROGRAM" serves as documentation of these medical conditions.

*Describe how the State ensures that no more than six total weeks (four consecutive weeks) of job search and job readiness assistance are reported in a fiscal year (or a total of 12 weeks in States that meet the definition of a "needy State" for the Contingency Fund).*

Indiana's TANF Data Warehouse is responsible for collecting the State's TANF data required for Federal reporting and has controls in place to ensure that no more than a total of six weeks (twelve weeks if certain circumstances apply) of Job Search and Job Readiness activities are reported in preceding twelve months. For the purposes of this calculation, a 'week' is defined as the average number of hours

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required for an individual's family to count in the overall work participation rate. For this purpose, one week equals 20 hours for a work-eligible individual who is a single custodial parent with a child under six years of age and 30 hours for all other work-eligible individuals. Thus, six weeks of Job Search and Job Readiness assistance equates to 120 hours for the first group and 180 hours for all others. For those months in which a State can count 12 weeks of this activity, these limits are 240 hours and 360 hours, respectively. The time limitations on this work activity are observed by use of computer coding and logic in the programs that accumulate records of Job Search and Job Readiness assistance activities. The code discards any records of participation in these categories for the 5th consecutive week (if there is one). It also discards any records of participation in the 7th or greater week in a fiscal year (or in the 13th or greater week during periods of time in which the State qualifies for counting extended periods of Job Search and Job Readiness assistance due to high unemployment or because it qualifies as a "needy State").

### **Community Service Programs**

*Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity.)*

Community Service Programs means structured programs and embedded activities in which TANF recipients perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Indiana recognizes only VISTA and AmeriCorps\* State programs as acceptable Community Service Programs.

*Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.*

Community Service site employees and program participants record actual hours of participation on attendance sheets and, if applicable, activity logs for each day of participation. All activities are supervised daily. The maximum number of monthly scheduled work-site participation hours may be no greater than the number of hours obtained by dividing the amount of the assistance group's monthly TANF grant and SNAP (Supplemental Nutrition Assistance Program) allotment by the federal minimum wage. Community Service participants are not considered to be employed by the community service site. The TANF and/or SNAP benefits received by the participants are not considered to be wages. The case manager is responsible for calculating the number of weekly hours a client may participate in a Community Service activity. This is same calculation used to determine CWEP participation hours.

*Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.*



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State or contracted staff verify the actual hours of participation by conducting monthly random reviews of daily logs, attendance records, and written statements from the Community Service Agency to ensure all information is timely, accurate, and complete.

The case manager is responsible for documenting participation in the IMPACT system. Written documentation is retained in IEDSS in the participant's electronic case file.

*Describe the methods of daily supervision for each unpaid work activity.*

A Community Service site employee provides on-site supervision and verifies the hours of daily participation in the activity. To be consistent with the universally understood definition of supervision used in the workplace, Indiana requires the Community Service site supervisor or designee to provide the supervision consisting of work related guidance and constructive criticism, mentoring, assignment of daily work activities, oversight of the work assignments, and the evaluation of work skills. This is documented as part of the formal agreement between the State IMPACT Program and the provider. Documentation is submitted to the State at least monthly.

*Describe how the types of community service positions that create an employer/employee relationship and are subject to the FLSA minimum wage requirements will be determined.*

Community Service Program participants are not considered employees under the FLSA.

*If the State permits self-initiated Community Service positions, describe how it determines that the position provides a direct community service and improves the recipient's employability.*

Participants may request to participate in a certain Community Service activity. The IMPACT Program case manager will determine if the request meets the requirements outlined in this section and ensure that the site complies with all agreements and conditions outlined above.

## **Vocational Educational Training**

*Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity.)*

Vocational Educational Training (12 month lifetime limit per individual) means organized and usually short term educational programs that are directly related to the preparation of individuals for employment in current or emerging occupations requiring training. There must be reasonable expectation of new or upgraded employment resulting from the training documented in the Self-Sufficiency Plan. Providers of Vocational Educational Training must be accredited or licensed by the appropriate State agency.

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Vocational Educational Training programs are provided by employment and training agencies throughout the State and may include vocational-technical schools, and degree or certificate programs at secondary and post-secondary educational institutions.

Countable Vocational Educational Training placements consist of: Associate in Science Degrees in the following categories: Business Administration; Culinary Management; Dental Hygiene; Drafting and Design; Early Childhood Management; Electronics Technology; Interior Design; Legal Assisting; Medical Laboratory Technician; Registered Nurse; Radiography, and Respiratory Care. Bachelor Degrees in occupational studies that have been identified by the Indiana Department of Workforce Development (DWD) as in demand jobs per DWD's 'Hoosier Hot 50 Jobs' (<http://www.state.in.us/dwd/2420.htm>) are also countable as vocational educational training.

Vocational Certificates in the following categories: Automotive Service Technician; Barbering; Brick Masonry; Carpentry; Child Care Center Operator; Corrections Officer; Cosmetology; Credit Union Service Marketing; Dental Assisting; Electricity; Facials Specialty; Heating and Air Conditioning; Massage Therapy; Medical Secretary; Nails Specialty; Network Support Services; Office Systems Specialist; Paramedic; Plumbing; Practical Nursing; Teller Training; Travel Agency Operations; and Webmaster and Web Development.

Other organized educational programs that are directly related to the preparation of individuals for employment in current or emerging occupations requiring training may be added when the Work Verification Plan is updated.

*Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.*

The school verifies the actual number of credit hours and financial aid received and documents class attendance. The school also verifies the required or advised number of homework hours. Attendance information is reported weekly by the participant to a case manager and verified at specific reporting intervals by the school or educational facility.

Vocational Educational Training providers maintain daily attendance records and, if applicable, hours of participation on the appropriate State forms. Actual class hours and time spent performing other ancillary activities such as clinical requirements and lab work required for approved Vocational Educational Training programs are considered part of the primary activity for which they are required and are countable. All activities are supervised daily. Time spent in supervised study halls and up to one hour of unsupervised homework time for each course credit is countable. Total homework time cannot exceed the hours required or advised by the educational program. Both the instructor and the participant verify attendance by signing the daily

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attendance form. Attendance forms and, when applicable, activity logs are provided to the case manager and retained in the IMPACT system participant's case file.

*Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.*

State or contracted staff verify the actual hours of participation by conducting monthly random reviews of daily logs, attendance records, and reviews of instructors' attendance and monitoring processes to ensure all information is timely, accurate, and complete.

The attendance records are provided to the case manager responsible for documenting participation in the IMPACT system.

When the information is incomplete or written verification does not validate the activity, the actual hours of participation will not be included in the WPR.

*Describe the methods of daily supervision for each unpaid work activity.*

Faculty, instructors, instructional aides, lab supervisors, study hall supervisors, and supervisors of work-based learning activities provide daily supervision and record attendance.

*Describe how the State ensures participation in Vocational Educational Training does not count beyond the statutory limitations limiting participation to 12 months lifetime per individual.*

Indiana's TANF Data Warehouse is responsible for collecting the State's TANF data required for Federal reporting and has controls in place to enforce the 12 month lifetime limit for Vocational Educational Training activities. The time limitations on this work activity are tracked by use of computer coding and logic in the programs that accumulate records of Vocational Educational Training activities.

*Describe how the State will ensure that basic and remedial education and English as a Second Language (ESL), if such activities are counted, are necessary or regular parts of the Vocational Educational Training.*

Vocational Educational Training programs that include instruction for those who need basic and remedial education and/or English as a Second Language (ESL) are required to certify in writing that the instruction is less than 50 percent of the course, and that the instruction is embedded in the Vocational Educational Training course. In addition, Indiana retains a copy of the curriculum.

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## **Job Skills Training**

*Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity.)*

Job Skills Training is 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, and may include Vocational Education and courses explicitly required for program entry.

This activity includes four-year Bachelor Degree programs at any State certified college or university. It also includes all services and programs described in the Vocational Educational Training activity described above.

*Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.*

Job Skills Training providers and program participants report actual hours of participation on time sheets and activity logs for every day of every week in each month. Actual hours spent in class as well as time spent performing clinical requirements, lab work or other ancillary activities required for approved Vocational Educational Training programs are considered to be a part of the primary activity for which it is required and is countable. Time spent in supervised study halls is countable, and up to one hour of unsupervised homework time for each course credit (if course credits are assigned) is countable. Total homework time cannot exceed the hours required or advised by the educational program.

*Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.*

State or contracted staff verify the actual hours of participation by conducting monthly random reviews of daily logs, attendance records, and reviews of the instructor's attendance and monitoring processes to ensure all information is timely, accurate, and complete.

Documentation of satisfactory participation in each of the activities is maintained in the provider's case file and submitted at least monthly to the participant's case manager. All verifications are retained in the participant's electronic case file in IEDSS.

When the information is incomplete or written verification does not validate the activity, the actual hours of participation will not be included in the WPR

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*Describe the methods of daily supervision for each unpaid work activity.*

The work-site supervisor or training instructor provides supervision and appropriate documentation on a daily basis.

### **Education Directly Related to Employment**

*Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity.)*

Adult clients, who have not received a High School Diploma, GED Certification, or the High School Equivalency (HSE) Diploma and need further education to obtain a specific job, or job offer, are placed in Educational (Academic) Activities which consist of the following:

Adult Basic Education (ABE); English-as-a-Second-Language (ESL); literacy skills; classes to prepare for the High School Equivalency (HSE) Diploma and testing to acquire the HSE Diploma. Supervised homework and study time, and up to one hour of unsupervised homework time for each hour of class time is countable. Total homework time cannot exceed the hours required or advised by the educational program.

*Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.*

Education providers and program participants record actual hours of participation for every day of the week in each month on the appropriate State Form. Actual hours spent in class as well as time spent in supervised study halls, and up to one hour of unsupervised homework time for each course credit (when course credits are assigned) are countable. Total homework time cannot exceed the hours required or advised by the educational program.

*Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.*

The schedule of classes and hours of participation are known to the case manager prior to approval of the activity and documented in the Self-Sufficiency Plan. Participants report their attendance at least weekly to the case manager. The case manager verifies the participant's reports through grades and attendance records provided at designated intervals by the educational institution. All documentation is retained in IEDSS in the participant's electronic case file.

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*Describe the methods of daily supervision for each unpaid work activity.*

Faculty, instructors, instructional aides, lab supervisors, study hall supervisors, and supervisors of work-based learning activities provide daily supervision for the hours of education.

*Describe the State's criteria for "good and satisfactory progress" and when and how it is documented.*

"Good and satisfactory progress" is defined as a passing grade, or its equivalent, according to the standards set by the educational institution. It is documented in the participant's case file at the end of every grading period by means of a report from the educational institution. The reports are documented and retained in the participant's electronic case file.

**Satisfactory attendance at secondary school or in a course of study leading to a High School Diploma or High School Equivalency (HSE) Diploma.**

*Describe the services or programs the State includes under the activity. (Services and programs must conform to the Federal definition of the activity.)*

The services and programs included under this activity are a course of study at a secondary school leading to a High School Diploma or a High School Equivalency (HSE) Diploma. Satisfactory attendance at a secondary school means "regular attendance" in accordance with the requirements of the educational institution in a course of study leading to a High School or HSE Diploma for a recipient who has not completed secondary school, or received such a diploma.

*Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.*

The number of countable hours is derived from verified school attendance records. Recipients participating in Educational (Academic) Activities) are supervised on a daily basis by school faculty. The school district or educational facility provides documentation of school attendance to the case manager monthly. The participant reports daily attendance at least weekly to the case manager who verifies the information upon receipt of the documentation from the educational facility.

*Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.*

The schedule of classes and hours of participation are known to the case manager prior to approval of the activity and documented in the Self-Sufficiency Plan. The participant reports his attendance at least weekly to his case manager. The case manager verifies the participant's reports through grades and attendance records

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provided at designated intervals by the educational institution. All documentation is retained in the participant's electronic case file.

*Describe the methods of daily supervision for each unpaid work activity.*

Faculty, instructors, instructional aides, lab supervisors, study hall supervisors, and supervisors of work-based learning activities provide daily supervision of the hours spent in each of these activities.

*Describe the State's criteria for "good and satisfactory progress" and when and how it is documented.*

"Good and satisfactory progress" means that the participant maintains regular attendance and at least the minimum passing grade requirement for receiving a High School Diploma or HSE Diploma. The participant's performance on the HSE pre-test and final examination is recorded in the person notes in the IMPACT system and in IEDSS. Copies of the tests (if provided) are retained in the participant's case file.

### **Providing child care services to an individual who is participating in a community service program.**

At present Indiana has no plans to utilize this work activity. The State will review and determine if this is an option the state wishes to pursue at a later date.

## **II. Hours Engaged in Work**

### Holidays

Individuals who are regularly scheduled hours for all unpaid work activities fall upon one of the holidays listed below, and for whom activity hours would have been scheduled for that date except that it was a holiday, shall be deemed to have participated on that holiday for those hours that would have been scheduled.

The following holidays are included under this policy:

New Year's Day  
Martin Luther King, Jr. Day  
Good Friday  
Memorial Day  
Independence Day  
Labor Day  
Thanksgiving  
Friday after Thanksgiving  
Christmas Eve Day  
Christmas Day

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## Excused Absences

Individuals scheduled hours in the unpaid work activities listed below will be deemed to have participated for those scheduled hours if the individuals failed to participate in the activity and were granted an excused absence. An individual may be allowed an excused absence for a maximum of sixteen (16) hours in a month, but no more than 80 hours in the preceding twelve month period.

- Work Experience
- Job Search and Job Readiness Assistance
- Community Service
- Vocational Educational Training
- Job Skills Training directly related to employment
- Education directly related to employment as in the case of a recipient who has not received a High School diploma or a certificate of High School equivalency (GED or HSE)
- Satisfactory attendance at a secondary school or in a course of study leading to a High School Equivalency (HSE) diploma, as in the case of a recipient who has not completed secondary school or received such a diploma
- Providing child care services to an individual who is participating in a Community Service Program

## FLSA Deeming

Indiana has adopted an approved Simplified SNAP program and will pursue the “deeming” provision permitted at §§ 261.31 and 261.32 for Community Work Experience or Community Service Programs.

Indiana determines the TANF recipient’s work hour requirement by combining the TANF household’s monthly TANF and SNAP benefits, subtracting the average amount of child support collected in the three most recent months, and dividing the sum by the Federal minimum wage. Indiana uses the Federal minimum wage rate as the state’s minimum wage. This number is used only for deeming the family’s core work activity hours.

- A work-site employee verifies the hours of daily participation in the activity through attendance records and on-site supervision of the recipient.
- State contracted staff document weekly progress in the case file and report the recipient’s progress and/or problems to the case manager at least monthly.
- State contracted staff receives documentation of attendance at least monthly and enter the information in the IMPACT system with activity code “CWEP”.
- Deeming will not occur unless the participant works the maximum monthly hours permitted based upon the TANF/SNAP grant divided by the Federal minimum wage.



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### III. Work-Eligible Individual

The term “work-eligible individual” means an adult (or minor child head-of-household) receiving assistance under TANF or a separate State program or a **non-recipient parent** living with a child receiving such assistance (usually a child-only case) unless the parent is:

- A minor parent and not the head-of-household or spouse of the head-of-household;
- An alien who is ineligible to receive assistance due to his or her immigration status, or
- At State option, on a case-by-case basis, a recipient of Supplemental Security Income (SSI) benefits.

The term also excludes:

- A parent providing care for a disabled family member living in the home provided there is medical documentation to support the need for the parent to remain home to provide full-time care;
- An individual in a family receiving MOE-funded assistance under an approved Tribal TANF program, unless the State includes the Tribal family in calculating work participation rates, or
- At State option, on a case-by-case basis, a parent who is a recipient of Social Security Disability Insurance (SSDI) benefits.

In determining an individual’s work-eligible individual status, the following definitions apply:

“Disabled” means having a physical or mental condition, illness, or impairment, supported by competent medical testimony .

“Family member” means an individual who resides at the same address as the TANF family and is a member of the TANF family, or is related to a member of the TANF family. Family relationship is limited to the following:

- Parent;
- Any blood relative within the fifth degree of relationship including, but not limited to, those of half-blood including first cousins, first cousins once removed, nephews, nieces, and individuals of preceding generations as denoted by prefixes of grand, great, great-great, or great great-great (this group includes the sister, brother, aunt, and uncle of the TANF family member).
- Stepfather, stepmother, stepbrother, and stepsister; (The parent of the step-parent does not meet this degree of relationship. There is no blood relationship, nor can this relationship be established through marriage);

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- An individual who legally adopts a child or the child's parent, as well as the natural and other legally adopted children, and other relatives of the adoptive parents, and
  - Legal spouses of any individuals named in the four groups above, even though the marriage was terminated by death or divorce.

This is same list of relatives used to determine if a child is living with a specified relative and thus eligible for TANF assistance.

All of these case types are based upon data and coding entered into IEDSS by eligibility caseworkers. The caseworker works with the client to obtain all necessary information for IEDSS to determine the appropriate eligibility status for each individual. Based on specific actions of the individual or non-compliance, IEDSS generates appropriate reason codes for each case. The caseworker reviews all eligibility status and reason codes; then a second party review takes place by a State Eligibility Consultant or State Eligibility Manager who is responsible for approval and authorization of the case. At the point of authorization, the case has been reviewed by two workers. The result of the authorization, as of the end of the month, is provided to the TANF Data Warehouse at which time the rules listed below are applied to each individual to determine the appropriate work-eligible adult code.

To determine if a person is a 'work-eligible individual,' the Data Warehouse applies the following rules to ensure that the work-eligible adult code was calculated correctly. The rules are based upon the household relationships coded in IEDSS and the child and adult's eligibility and participation statuses. For the purposes of this determination, a 'parent' is defined as a person having a son or daughter who is an eligible child receiving assistance, or child receiving 1619A, 1619B or SSI.

1 = Yes, an adult (or minor child head-of-household) receiving assistance.

- Rule: Participation status code is EA and Eligibility status is Pass.

2 = Yes, a non-recipient parent due to a sanction.

- Rule: Parent who fails eligibility due to work requirements sanction, non-cooperation with child support, failure to comply with an individual responsibility plan, or other sanction.

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

- Rule: Parent and case reason code is 830 – 24 month , 831 – continues 24 month, 833 – 60 months, 834 – continues 60 month.

4 = Yes, a non-recipient parent receiving SSI (and State opts to include).

- Rule: Parent and 1619A, 1619B or SSI recipient status in IEDSS.

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

- Rule: Any parent and who does not fit into the categories above, and is not an ineligible alien.

If IEDSS fails to send an IMPACT referral code for individuals coded as Family Affiliation 2, that individual will default to 'required to work as a member of the eligible family receiving assistance.'

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When determining how many times an exception code has been used, exceptions are only counted for individuals who are family affiliation 1 at the time of the exception. This is true for determining the use of HHS work participation codes 01, 02, 12 and 13.

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

Indiana will implement various internal controls to ensure that Indiana complies with its Work Verification Plan. In addition to computer system checks and balances, the State will initiate a quality assurance case review through the FSSA, Division of Family Resources IMPACT Policy Section

Indiana will maintain all pertinent findings produced through its internal control processes which will be available for use by HHS and other auditors in their review of the State's work participation verification system.

- 1. Describe the internal controls designed to ensure that established work verification procedures are being employed properly. Such controls may include supervisory guidance, policy directives, and staff training plans, as well as quality assurance processes, such as monitoring procedures to ensure adherence to procedures by staff, providers and contractors. For example, to ensure the State is identifying all work-eligible individuals, a State may periodically check the disability status of a family member who is temporarily disabled, as the parent caring for the disabled family member would become a work-eligible individual once the family member is no longer disabled.*

The IMPACT Policy Unit of the Bureau of Economic Independence, with assistance from the Bureau of Program Integrity (BPI), will monitor the State of Indiana's compliance with the Work Verification Plan as delineated in the regulatory requirements of the Interim Final Rule published by the U.S. Department of Health and Human Services. The IMPACT Policy Unit will complete an audit of a minimum of 150 active Temporary Assistance for Needy Families (TANF) households which include a 'work-eligible individual' over the federal fiscal year (October through September). The purpose of this review is to ensure accuracy in the reporting of work participation activities.

The sample will be selected statewide with 10 cases from the two largest Indiana counties of Marion and Lake, and 10 cases each from the remaining eight regional areas. An independent verification will be completed for the countable work activities identified from the IMPACT system and IEDSS case record, IEDSS reports, electronic data matches, and the Welfare Reform Data Warehouse. IMPACT will create a worksheet and coding schedule to capture the review findings. We use the same sample process currently used to pull cases for SNAP quality control reviews.

The review itself will focus on activity hours reported to HHS. Each month, the Data Warehouse will provide a complete list of all individuals reported to HHS with

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countable activity hours to the FSSA Budget and Reports Sections. Budget and Reports will produce a sample from that report. The IMPACT Policy Unit will review the case file to determine whether the case file contains sufficient documentation and verification to justify the reported hours. If the IMPACT Policy Unit determines that the case file does not contain sufficient documentation and verification, the IMPACT Policy Unit will contact the employer, vendor, or client to secure the documentation. If the IMPACT Unit cannot obtain sufficient documentation or determines that we have under-reported the activity hours based upon the review, the IMPACT Policy Unit who will then notify data warehouse of these findings so that the data can be corrected.

The local staff will be given feedback on every review and allowed time for rebuttal. A final summation of the case review findings will be submitted to the State identifying problem areas and proposing actions to prevent or reduce the incidence of error.

- 2. Describe the internal controls to control for data errors including transcription and coding errors, data omissions, computational errors, and compilation errors. For example, a State might automatically review the case record of each work-eligible individual whose reported average weekly hours of participation are unusually high (e.g., 70 or more hours per week) by examining the documentation used to support those hours.*

The TANF Data Warehouse reviews and controls all of the TANF data for errors throughout the processes developed to create the Federal Reports. Data is received from the eligibility systems and, prior to being loaded to the TANF Data Warehouse; validations for content and consistency with prior months' data are applied. Validations are based on the Final Rules for TANF and have been updated to reflect the Error Reports issued by HHS.

The data is tracked over time to control for work activities which have limitations. Limits counting in the work participation rate are in place both statewide and on an individual basis for specific work participation activities. Vocational Educational Training hours are an example of both statewide limits and individual limits with individuals limited to a 12 month lifetime limit inside the statewide limit of no more than 30% of the State's TANF population.

The employment hours and activities are also monitored to identify exceptions that may present potential problems. An example of this would be a work-eligible individual who has employment and employment-related activities which total over 174 hours for the month.

The results of these validations, along with the detailed data behind any issue, are available via a web-based application for review by the source system administrators. Additional web-based reports allow Central Office staff and county

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workers to review county level data and view exceptions to the validation schematics HHS has in place for the data Indiana submits.

- 3. Describe the checks used to isolate electronic systems and programming errors and the steps to ensure that all work participation report items are internally consistent. For example, a State might obtain the raw data (prior to input into an automated data processing system) for a sample of work-eligible individuals and determine manually the average weekly hours of participation for each work activity for a month and compare that result to what the State actually reported to HHS.*

There are several points at which data is reviewed and controlled for errors. Once eligibility, hours of participation and employment data are sent from the source systems to the TANF Data Warehouse, the data is immediately validated for coding errors and data consistency. Critical errors effecting TANF data reports are reviewed and corrective actions are taken.

The data is then loaded to the TANF Data Warehouse and the TANF Federal reports are created. Then another set of validation processes are run and the data is reviewed for consistency. Automated processes allow the data to be reviewed in detail for consistency across all report fields; the data is trended to highlight any inconsistencies or anomalies. Critical errors effecting TANF data reports are again reviewed and corrected, and ongoing corrective actions are taken to prevent the same issue from recurring.

There are external reviews of the data once the TANF data reports are created each month. A web-based application allows counties to review the results at the individual and case level detail. Indiana's internal Office of Data Management also reviews the data for consistency, focusing specifically on employment and work related activities, at both the summary and detail levels.

- 4. Describe any sampling and estimation techniques employed in data validation. The Work Verification Plan should document the soundness of all statistical procedures utilized in the verification process. All estimation techniques must be reasonable and fully described in the plan. For estimates based on sampling or other statistical techniques, the plan must contain, as appropriate, the step-by-step computations of precision affirming that the produced estimates are within statistically acceptable levels of reliability and validity.*

Indiana will not utilize sampling or estimation to validate its data submitted for Federal TANF reporting, but will use sampling as part of its program integrity process discussed under section IV.1 of this plan.

## **V. Verification of Other Data Used in Calculating the Work Participation Rate**

The Welfare Reporting Automation (WRA) Project of FSSA has been reporting all sections of the HHS Final Regulations since October 1999. A key element of HHS reporting is the

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Work Participation Rate (WPR). The WPR is the percentage of adult or minor head-of-household TANF recipients who are meeting the minimum work requirement hours through employment and/or work related activities administered by the Indiana Manpower and Comprehensive Training (IMPACT) Program. The IMPACT Program helps TANF and SNAP recipients stabilize their environment and become economically self-sufficient. The case manager works with the clients to tailor job-related services to help them achieve this goal. The IMPACT activities and hours are tracked in IEDSS and transmitted to the TANF Data Warehouse. IEDSS tracks the employment as well as individual requirements for participation in the IMPACT Program. Once received by the TANF Data Warehouse, the activities (combined with employment data and the individual's eligibility status) are used to determine if the individual is meeting the WPR requirements. This individual level data is then used to calculate an overall statewide WPR.

### **Documentation**

1. *For each of the above data elements, describe the State's data validation procedures to ensure "complete and accurate" data reporting.*

**Reporting Month** – On the last business day of each month, a process runs in IEDSS and extracts all cases and their details as of that date and writes that data to files. The files are then transferred to the Indiana FSSA Data Warehouse where the data is validated and loaded to a relational database with each reporting month stored sequentially as individual months of data based on month end- date. The data is then extracted from the month equal to the month reported on the Federal TANF reports.

**Stratum** – Indiana provides data for its entire caseload; therefore, the Indiana FSSA Data Warehouse report program sets this value to '99' for all records.

**Case Number** – The case number is created in IEDSS and then validated prior to adding to the Indiana FSSA Data Warehouse.

**Disposition** – Indiana reports for its entire caseload and does not report families that did not receive any assistance for the reporting month; therefore, the Indiana FSSA Data Warehouse report program sets this value to '1 – Data collection completed', for all records.

**Type of Family for Work Participation** – The relationship information is entered by the caseworker into IEDSS. The caseworker asks the client the nature of each relationship within the household. Each individual becomes the target in the case and their relationship to every other household member is entered. The data is then extracted at the end of each month and stored in the Indiana FSSA Data Warehouse. The Data Warehouse implements logic to determine the following for each case by reading the codes set in the source system for each individual in the case.

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An eligible child is one who passes eligibility requirement or a non-participating child who fails due to disability status. Both of these groups of individuals are considered eligible children.

An adult is considered an eligible adult who passes eligibility requirements, or an eligible adult who passes eligibility requirements but is not participating.

If there are 2 parents (natural or adoptive as determined by the relationship codes) equal to mother and father for those individuals to an eligible child(ren) in the TANF case, then the case is considered a 2 parent case and the code is set to '2'. The exception would be if both are minor parents and neither is the head-of-household. A minor parent is determined based on the report month and the age of the individual based on the date of birth, which is supplied by IEDSS. The head-of-household is determined in the source system and passed to the Data Warehouse to be used in this determination.

1. If there is only 1 parent or caretaker (who is receiving assistance) as determined by relationship codes of mother, father, aunt, uncle, grandmother or grandfather for that individual to an eligible child(ren) in the TANF case, then the case is considered a 1 parent case and the code is set to '1'.
2. If there is no parent present in the case or a non-recipient caretaker as determined by no relationship code equal to mother or father, or relationship code equal to aunt, uncle, grandmother or grandfather to an eligible child(ren) and the individual is not receiving assistance, then the case is considered a no-parent family and the code is set to '3'.

**Amount of SNAP Assistance** – Calculated by the Indiana FSSA Data Warehouse based on the number of individuals in the SNAP case divided by the number of eligible recipients to create an amount per person (the prorated method). The prorated value is then multiplied by the number of TANF recipients in the case who are also receiving SNAP benefits to calculate an amount of SNAP Assistance for the TANF case. This calculation accounts for individuals who may be in the SNAP assistance group, but are not included in the TANF case.

**Receives Subsidized Child Care** – The Indiana FSSA Data Warehouse receives monthly child care CCDF claims paid data from the Indiana Bureau of Child Care. The Data Warehouse uses a highly efficient probabilistic data matching process which matches the individuals from the Indiana Bureau of Child Care to the IEDSS TANF population for the reporting month. The claims paid data which matches to the TANF individuals is then loaded to the Indiana FSSA Data Warehouse and stored at the individual level for the month in which it was paid. The data for each of the individuals receiving child care assistance in the TANF case for the reporting month is summed and reported for the report month.

**Amounts of TANF (and SSP-MOE) Assistance** – Calculated by IEDSS. Initially the Gross Need Standard is reviewed to determine if the family passes the test and is below the Gross Need Standard. The TANF countable income is reviewed for each individual in the case, including earned income and net self-employment (gross minus business

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expenses) income. Work disregards are then deducted from the total earned income (examples of this would be the \$30 disregard allowed for one year after employment begins and the 1/3 of the income disregard allowed for 5 months after employment begins) to derive the 100% countable income for the individual.

Once the TANF countable income is calculated for each individual in the case, the total amount is then calculated for the case. The total unearned, allocated, and deemed income is then added to the family income. Then a total allocated income is calculated for non-eligible members of the family and deducted for benefit calculation purposes. The result is the family's countable net income which is then compared to the 100% Federal poverty limit for the family size. Once the family passes the 100% FPL net test, a monthly benefit is calculated.

Using the Indiana need payment standards, the net income is subtracted from the needs standard to calculate a grant amount. For example, a family of 3 (parent and 2 children) has a need standard of \$288. If the net income of the family has been calculated at \$100, the grant amount would be \$188.

Recoupments and sanctions are deducted from this calculated recurring monthly benefit amount to calculate a net benefit amount.

**Family Affiliation Code** – The Indiana FSSA Data Warehouse determines the family affiliation code based on the participation status and relationship of the individuals to the other members of the case as listed in IEDSS. The following rules are used to set each code:

1. Member of the eligible family receiving assistance - Everyone receiving assistance with a participation status of EC (eligible child) or EA (eligible adult) and eligibility status of Pass. ALL EC or EA individuals with eligibility status of Fail due to a work program sanction.
2. Parent of minor child in the eligible family receiving assistance - All other adults with a parental relationship of mother or father.
3. Caretaker relative of minor child in the eligible family receiving assistance - All non-participating, non-parent caretakers.
4. Minor sibling of child in the eligible family receiving assistance - All children with a participation status of NC (non-participating child) with an eligibility status of Fail.
5. Person whose income and resources are considered in determining eligibility for or amount of assistance for the eligible family receiving assistance - Adults with income and resources used to determine the grant for the case, but who do not receive assistance .
6. Person who is in the eligible family, but not reported - Any other child or adult who does not fit the above criteria.

**Non-custodial Parent Indicator** – Indiana does not provide assistance to non-custodial parents, does not designate non-custodial parents as members of the TANF assistance



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group, and does not allow non-custodial parents to participate in work activities. As such, the non-custodial parent indicator will always be coded as 'No.'

**Date of Birth (Adult)** – Verified in IEDSS by the caseworker via a hard copy of the birth certificate. Each individual's DOB is validated and verified as part of the Social Security Number data match with the Social Security Administration prior to adding to the Indiana FSSA Data Warehouse.

**Relationship to Head-of-Household** – The head-of-household and relationships are determined by the caseworker in IEDSS, based on the responsible adult in the family who is also the payee of the case. The data is passed to the Indiana FSSA Data Warehouse and is validated to confirm that a child is not listed as the head-of-household with the exception of minor parents.

**Parent with Minor Child** – The relationship information is entered by the caseworker into the IEDSS system. The caseworker asks the client the nature of each relationship within the household. Each individual becomes the target in the case and their relationship to every other household member is entered. The data is then extracted at the end of each month and stored in the Indiana FSSA Data Warehouse. A parent with a minor child is calculated by the Indiana FSSA Data Warehouse based on a mother or father relationship to an eligible child in the case.

**Work-Eligible Individual Indicator** – The Indiana FSSA Data Warehouse determines the work-eligible adult code based on the participation status and relationship of the individuals to the other members of the case as assigned to the individual by the IEDSS system. A parent is an adult with a mother or father relationship to an eligible child in the case. The following rules are used to set each code:

1. Yes, an adult (or minor child head-of-household) receiving assistance - Everyone receiving assistance with a participation status of EC (eligible child) or EA (eligible adult) and eligibility status of Pass.
2. Yes, a non-recipient parent due to a sanction – A parent and eligibility status is Fail and the individual has a work requirements sanction, a non-cooperation with child support sanction, a failure to comply with an individual responsibility plan, or other sanction.
3. Yes, a non-recipient parent due to a time limit – A parent and the parent is no longer eligible in the case due to the following reason codes assigned by IEDSS and passed to the Indiana FSSA Data Warehouse, where it is stored at the case level.
  - END OF 24 MONTH ELIGIBILITY PERIOD
  - TANF FAILURE CONTINUES DUE TO MORE THAN 24 MOS. BENEFITS
  - TANF FAILURE DUE TO MORE THAN 60 MOS. BENEFITS
  - TANF FAILURE CONTINUES DUE TO MORE THAN 60 MOS. BENEFITS

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4. Yes, a non-recipient parent receiving SSI (and State opts to include)- A parent who is disabled, receiving SSI with a status of 'B', 'R' or 'A' and is engaged in work activities 30 hours per week.
  5. Yes, a non-recipient parent due to other reasons - Any parent who does not fit into the categories above and is a citizen as indicated by citizenship status determined by the caseworker in the IEDSS system.
  6. No, a non-recipient, but not a parent - Any non-parent (adult who is not a mother or father to an eligible child) who does not have family affiliation of 'E - Eligible'.
  7. No, an ineligible alien due to immigration status - Any adult who does not fit into the categories above and is not a citizen as indicated by citizenship status determined by the caseworker in the IEDSS system.
  8. No, a non-recipient parent receiving SSI (and State opts to exclude) - A parent who is disabled, receiving SSI with a status of 'B', 'R' or 'A' and is not engaged in work activities 30 hours per week.
  9. No, parent caring for a disabled family member in the home - Parent and the work programs referral code set by the caseworker in IEDSS indicates Exempt due to caring for an ill or incapacitated household member, or Exempt due to a 2 parent household in which one parent cares for a severely disabled child; in either scenario the child being cared for does not attend school and is considered SSI disabled with a status of 'B', 'R', or 'A'.

**Date of Birth (Child)** – Verified in IEDSS by the caseworker via a hard copy of the birth certificate. Each individual's DOB is validated and verified as part of the Social Security Number data match with the Social Security Administration prior to adding to the Indiana FSSA Data Warehouse.

2. *Describe any procedures employed to eliminate data inconsistencies between two or more data elements.*

In preparing the TANF Data reports, the Indiana FSSA Data Warehouse employs several processes to ensure the data is valid and consistent:

- The data from the eligibility system is verified upon arrival for the content of the fields and the cross relationship and consistency between elements. All issues are reported back to the system administrative staff for reconciliation and data correction.
- For reporting, all demographic data is taken from the eligibility system where it was verified by established procedures – hard copy birth certificates, rental agreements, bank statements, etc.
- All data derived for the reports is based upon the data from the eligibility system; for example, 'Type of Family for Work Participation' as outlined above.
- Upon creation of the monthly file of data for reporting, the data is again validated to ensure the field contents are valid and that there is cross relationship and consistency between elements. For example, if family affiliation is not 5, then a Race/Ethnicity is required

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- Upon submission of the data to HHS, Indiana receives a Transmission Report and any issues raised on this are addressed. Fatal errors are reviewed and, after establishing where the fix is required, remedial corrections are made and the data is resubmitted. Warning errors are reviewed and, where possible, changes are made to the source system data collection and/or the report derivation processes in order to address these issues.

## **Work Participation Status**

*1. Describe the State's procedures to ensure that a family is not disregarded from the work participation rate for more than 12 months per lifetime based on being a single custodial parent with a child less than one year of age.*

The Data Warehouse tracks the use of each of the work participation codes which have limits. For the lifetime limit, once an individual reaches the 13th month for the HHS work participation disregard, the program sets an exception flag for that individual and treats the individual as if they are required to participate. The program searches for work activity hours for that individual and sets their work participation status according to their countable hours. The process used to track this disregard is a cumulative tracking table which adds the new data each month. The tracking is only incremented when the client meets the requirements of a single custodial parent with a child less than 12 months. The same process applies to other activities with annual and lifetime limitations. The annual activities reset each year in October when the new Federal fiscal year begins.

*2. Describe the State's procedures to ensure that a family is not disregarded from the work participation rate for more than three (3) months in any period of 12 consecutive months based on a work-eligible individual's refusal to participate in work.*

An individual work requirement status is assigned to each adult TANF recipient by the caseworker in IEDSS and a specialized case manager works with the client to achieve the goal of self-sufficiency. When a client fails to complete the assigned activities, they are sanctioned until they comply with the goals of the Self-Sufficiency Plan. Sanctioned individuals are indicated by a referral code passed to the Indiana FSSA Data Warehouse where it is used in calculating the individual's work participation status. The Data Warehouse tracks the use of each of the work participation codes which have limits. For the lifetime limit, once all the individuals in the family/case reach the 4<sup>th</sup> month of the HHS work participation status 02, the program sets an exception flag and treats the individual as if they are required to participate. The program searches for work activity hours for the individuals and sets their work participation status according to their countable hours. The Data Warehouse will no longer exempt any individual in the case beyond the overall 3 month limit. The process used to track is a cumulative tracking table which adds the new data each month. The same process applies to other activities with annual and lifetime limitations. The annual activities reset each year in October when the new Federal fiscal year begins.

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The number of sanctioned months imposed on all the eligible adults is tracked at the individual level in order to ensure that when HHS code 02 can no longer be used, due to time limits, the still sanctioned individual is correctly assigned to HHS code 12 or 13.

*3. Describe the State's procedures for ensuring a family deemed engaged in work based on 20 hours of participation in countable work activities meets the requirements of a single custodial parent or caretaker relative with a child under age six. (Does not have 30 hours of activities, has a child under age six based on birth date, and is engaged in 20 hours of countable activities per week.)*

The Data Warehouse calculates the countable hours the parent or caretaker relative is engaged in work. If the individual has less than 30 countable hours, the process calculates the age of each of the eligible children in the family based on the date of birth, which is a verified field in IEDSS. If there is a child under the age of 6 and there are 20 hours of countable work activity, the program sets the work participation code to HHS work participation status 17.

## **Certification**

This is to certify that Indiana's TANF Work Verification Plan dated March 11, 2022 includes all the information required by the Regulations at 45 CFR 261.62(b) and accurately reflects the provisions under which Indiana will be operating effective January 1, 2022.