Vermont Work Verification Plan

Submitted by the Economic Services Division
Vermont Department for Children and Families
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I.   Countable Work Activities

    A. Unsubsidized Employment

        1. Describe the services or programs the State includes under the activity.

        Unsubsidized employment is a job with wages or self-employment income not subsidized with Reach Up or any other public funds.

        2. Describe how the State determines the number of countable hours of participation for the activity.

          a. Wage-paying unsubsidized employment

          Vermont bases countable hours of participation on hours for which the participant is paid, including paid leave and holidays.

          Vermont projects up to six months of hours based on documented actual hours. Eligibility workers are required to re-determine financial eligibility for Reach Up families at least every six months. At the time of initial application and eligibility review, eligibility workers enter detailed data into the Access system[1] about each pay period in the past 30 days, including the frequency of pay (weekly, every other week, twice a month, or monthly), the date on which the earner was paid, gross wages, and total hours.

          For a single paycheck that is not reflective of ongoing income and hours (e.g. unpaid sick leave), the eligibility worker will verify with the employer that the paycheck is unusual,and will not include it in the income/hours calculation. For TANF reporting purposes, Access calculates the average hours of work per week as follows:

- For wage earners paid weekly, by averaging the hours entered for each pay period.
- For wage earners paid every other week, by averaging the hours entered for each pay period and dividing by two.
- For wage earners paid twice a month, by averaging the hours entered for each pay period and dividing by 2.15.
- For wage earners paid monthly, by dividing the hours entered by 4.3.

          Fluctuating or irregular income and hours will be averaged over a 90day period. An example of this type of income is per diem work. The eligibility

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[1] Access is Vermont's automated eligibility determination and benefits processing system for the administration of Reach Up (TANF), 3SquaresVT (SNAP), Medicaid, General and Emergency Assistance, and State Essential Persons. See Sections III, IV, and V, as well as Appendix A for more about Access.

worker will request paystubs for the previous 90 day period, and then average the income and hours using the following formula:

- Total Gross Pay From 90 day verification period paystubs

- Divided by number of paystubs

- Multiplied by pay frequency

- Equals gross monthly average income/hours

Eligibility workers will then enter the gross monthly average income and hours in Access.

The result of the Access calculation of average hours per week is carried forward until the eligibility worker enters different pay period data, including the wage earner's hours. Eligibility workers are required to collect and document such detailed data about wage earners' pay and hours of work when a change is reported or every six months, whichever occurs first.

If, as verified by the employer, these hours are not representative of future hours, however, the projection is based on the employer's documented statement of hours.

b. Self-employment

Vermont reports countable hours of self-employment as the result of dividing net self-employment income by the Vermont minimum wage. Net self-employment income is defined as gross self-employment income minus allowable business expenses, determined in the same way it is determined for the purposes of eligibility.

Vermont projects up to six months of self-employment earnings and business expense based on a tax return or, in the absence of a representative tax return, other detailed documentation of net self-employment income provided by the participant. Projected self-employment income is the same as that used to determine the family's TANF cash assistance grant.

The projection of net self-employment income is established under the same conditions as projections of wages: at the time of application and eligibility review and when a change is reported.

3. *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.*

a. Wage-paying unsubsidized employment

Vermont bases its projections of hours on pay stubs, a statement from the employer, or other documentation from the employer. Such documents or copies of them are filed in the participant's electronic case file. The worker's written entry in the case file or data entry in Access attesting to the details of a verifying document, including the nature of the document (e.g., pay stub, time card), dates and number of hours, the participant's name, and the employer's name, is also acceptable as documentation. The worker's written entry in the case file of the details of a telephone call to the employer, including who verified the hours and what the hours were for what periods, also constitutes documentation.

b. Self-employment

For self-employment, the participant's last income tax return, if it reflects current and ongoing circumstances, constitutes verification of net self-employment income. If no tax return is available, then the participant is required to provide detailed accurate records of income and expenses. A worker's written entry in the case file attesting to the details of a verifying document or collateral contact also qualifies as verification. Documentation of self-employment income is the same as that used to determine the family's TANF cash assistance grant.

B. Subsidized Employment

1. *Describe the services or programs the State includes under the activity.*

Subsidized private employment is a job in the private sector, other than on-the-job training, that pays wages subsidized with Reach Up or other public funds or for which the employer receives a subsidy from TANF or other public funds to offset some or all of the wages and costs of employing a participant. Subsidized employment includes supported employment for individuals who have disabilities when it is supported with TANF or public funds. Subsidized public employment is the same as subsidized private employment in all respects except that the job is in a public sector employment setting.

Employment is considered subsidized if the employer, rather than the employee, receives a subsidy from TANF or any other public program. Employer tax credits for hiring economically disadvantaged workers are not considered subsidies. Wage-paying work study subsidized by an educational institution is considered subsidized employment.

2. *Describe how the State determines the number of countable hours of participation for the activity.*

Vermont bases countable hours of participation on hours for which the participant is paid, including paid leave and holidays. Paid hours spent in support activities may be counted as subsidized employment but not on-the-job training. Such support activities include substance use disorder treatment, mental health treatment, rehabilitation, and various other barrier-removal and educational activities.

See section 2 above under Unsubsidized employment for further details.

3. *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.*

   Vermont bases its projections of hours on pay stubs, a statement from the employer, or other documentation from the employer. Such documents or copies of them are filed in the participant's electronic case file. The worker's written entry in the case file or data entry in Access attesting to the details of a verifying document, including the nature of the document (e.g., pay stub, time card), dates and number of hours, the participant's name, and the employer's name, is also acceptable as documentation. If no documentation can be obtained, the worker's written entry in the case file of the details of a telephone call to the employer, including who verified the hours and what the hours were for what periods, constitutes documentation.

C. On-the-Job Training

1. *Describe the services or programs the State includes under the activity.*

    On-the-job training (OJT) is an activity with ongoing supervision in which the participant receives training essential to the full and adequate performance of a job while engaged in productive work. The participant must be a paid employee during the time the participant spends in OJT. A paid apprenticeship is a type of on-the-job training.

    The following characteristics distinguish OJT from subsidized employment:

    *   The contractual agreement establishing an OJT placement includes a formal training plan.
    *   Only the costs of training are subsidized in an OJT placement.

2. *Describe how the State determines the number of countable hours of participation for the activity.*

    Vermont bases countable hours of participation on hours for which the participant is paid, including paid leave and holidays.

    See section 2 above under Unsubsidized employment for further details.

3. *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.*

    Vermont bases its projections of hours on pay stubs, a statement from the employer, or other documentation from the employer. Such documents or copies of them are filed in the participant's electronic case file. The worker's written entry in the case file or data entry in Access attesting to the details of a verifying document, including the nature of the document (e.g., pay stub, time card), dates and number of hours, the participant's name, and the employer's name, is also acceptable as documentation. The worker's written entry in the case file of the details of a telephone call to the employer, including who verified the hours and what the hours were for what periods, also constitutes documentation.

II.   Work-Eligible Individual

Vermont defines a work-eligible individual as an adult (or a 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 unless the parent is a minor parent and not the head of-household or a non-citizen who is ineligible to receive assistance due to his or her immigration status. On a case-by-case basis, Vermont includes recipients of Supplemental Security Income (SSI) benefits and excludes parents receiving Social Security Disability Insurance (SSDI) benefits. A parent providing care for a disabled family member living in the home is excluded from the definition of a work-eligible individual, provided that there is medical documentation to support the need for the parent to remain in the home to care for the disabled family member.

1. *Describe the state's procedures for identifying all work-eligible individuals, as defined at §261.2.*

   a.   Data collection, verification, and processing overview

   Vermont determines eligibility for Reach Up families based on data collected from the applicant head of household and collateral sources, as needed. The principal tool for collecting data about the family's circumstances is the ESD-202 Statement of Need form, which is used for individuals and households applying for Reach Up, SNAP and State Essential Person assistance. See Appendix B. In completing the Statement of Need, the applicant head of household indicates what kinds of assistance members of the household are requesting and provides detailed data identifying each household member and their income, resources, and expenses.

   Verification and documentation of information provided by the head of household is required at the time of initial eligibility determination and periodic eligibility reviews and when changes occur.

   The data are entered into Vermont's data processing system, Access, and edited extensively, both at the time of data entry, in background, and during eligibility processing. See Appendix A for an overview of Access data entry, editing, and eligibility processing.

   Once a month, data about the circumstances of families receiving TANF and SSP-MOE during the previous month are extracted from the Access system and stored in SPSS data files. These data are used for ESD planning, evaluation, and analysis. They are also used to meet reporting requirements, including federal TANF and SSP-MOE reporting requirements.

Some data required for TANF and SSP-MOE purposes are transmitted to HHS in the same form it is extracted from Access. Other data are used to derive the data elements required by HHS.

Before transmitting the TANF and SSP-MOE data files, SPSS programming staff run the files through a series of edits that mimic the edits they will later undergo at the federal level. These staff are also responsible for resolving any data problems at HHS's request following receipt of transmitted files. See Section V for more detail on Vermont's SPSS processing.

b. Adults or minor heads of household receiving assistance under TANF or a separate state program.

   In Access the applicant head of household (role code = '01') must always be a parent or other caretaker relative of an eligible child (or an unborn child) before the family will be determined eligible for assistance by the eligibility subsystem. The spouse of the head of household (role code = '02') is identified by his or her relationship to the applicant head of household. A parent of the applicant's child, not a spouse, is also identified as such (role code = '03'). Any other family members must qualify as eligible minor children to receive assistance.

   Eligible minor parents who are not heads of household are coded as children related to the applicant head of household (role code = '05,' '06,' '07,' '08,' or '09').

   During Access eligibility processing, all family members who are parents or siblings of an eligible child are included in the assistance group for the purposes of determining financial eligibility, except those receiving SSI assistance. Such family members are assigned a Reach Up member code of '1' in Access, denoting someone whose income and resources must be considered in determining the family's eligibility.

   Eligibility for each member is also determined on an individual basis. Access sets a person needs flag to 'failed' when a member does not pass Access person-level eligibility tests. If this does not make the family ineligible under Vermont rules, the needs of such a member would not be included in the calculation of the family assistance benefit, and s/he would not be identified as an individual receiving assistance.

   An adult or minor head of household receiving assistance, then, is a member of an eligible family with a role code = '01,' '02,' or '03,' a Reach Up member code of '1,' and a person needs flag = 'passed.'

   Vermont opts to exclude a parent receiving Social Security Disability Insurance (SSDI) on a case-by-case basis. Retroactive receipt is also a basis for exclusion, within the limits of TANF reporting deadlines.

c. Nonrecipient parents living with a child receiving assistance under TANF or a separate state program included as work-eligible individuals.

   A nonrecipient parent living with a child receiving assistance is a member of an eligible family with a role code = '01,' '02,' or '03,' a Reach Up member code of '1,' and a person needs flag = 'failed.'

- Under Vermont rules, a minor parent not considered emancipated under Vermont law and living with an eligible son, daughter, or sibling receiving Reach Up assistance must also be included as a member of the assistance group in the eligibility determination. A minor parent eligible for assistance in her own right is coded as the applicant head of household.

- In Vermont, the family's assistance grant is reduced by a dollar amount when sanctions are imposed because of a parent's noncompliance with work requirements. The sanctioned parent remains an eligible member of the assistance group.

- Vermont has opted to include parents receiving SSI as work-eligible individuals on a case-by-case basis.

d. Adults not included as work-eligible individuals

- In Access, a caretaker relative other than a parent not receiving assistance has a role code = '01' (applicant head of household), but there is no eligible child in the assistance group who is the son or daughter of the applicant head of household (role code = '05').

- In Access, a nonrecipient parent receiving SSI has a Reach Up member code equal to '9.' Work-eligible individuals granted SSI retroactively are manually excluded for the period of their retroactive eligibility, as permitted within TANF reporting deadlines.

- Under Vermont rules, a minor parent who is not head of household and not considered emancipated must be considered an eligible child if the assistance group includes the minor parent's child or sibling as an eligible child. An emancipated minor parent is considered a head of household in her own right.

- In Access, a parent caring for a disabled family member in the home has a Reach Up participation code of '11.' The family member's medical condition must be certified by a medical professional as documented by the presence of a completed ESD-210NMR, *Medical Report (Needed in the Home)*, in the case file.

- Under Vermont rules, the family member must be a parent, spouse, civil union partner, or child of the parent in question. The family member must be disabled or seriously ill, requiring continuing in-home care under the direction of a physician as a result of an accident, disease, or physical or mental condition, and also meet one of the following criteria:

✓ The person is expected to require care for at least two weeks and no more than 12 weeks.
✓ The person is expected to require care for more than 12 weeks, and no alternative care that enables the participant to fulfill the unmodified work requirement can be arranged.
✓ The person has a terminal illness and has a life expectancy of fewer than 12 months.

When a participant is determined needed in the home to care for a disabled family member, the eligibility worker enters the date by which the disability must be reviewed into the Access system. The system notifies the worker with an edit message as the date approaches.

2. *Describe the procedures that show how the state ensures that, for each work-eligible individual, it accurately inputs data into the automated data processing system, properly tracks the hours, and accurately reports countable hours to HHS that do not include participation in an activity that does not meet a federal definition.*

To record an individual's participation in a work activity, the eligibility worker enters income and hours as described in Section I.

Vermont also uses the internal controls described in Section III of this plan to ensure that data used in the calculation of TANF work participation rates are accurate and complete. In addition, programming changes to Access are routinely tested by both programmers and testers familiar with field operations before implementation to make sure they work as intended. Full-time computer problem-solving staff help case managers resolve problems they encounter in the field, if possible, and identify necessary programming changes on an ongoing basis.

Access is a comprehensive system designed to perform integrated data collection, data checking, eligibility determination, benefits processing, and reporting for TANF, SNAP and State Essential Person assistance. Much of the data used to determine variables used in the calculation of TANF participation rates is also used to determine eligibility for all these programs. Data used for SNAP is also subject to highly structured federal quality assurance review.

III.   Internal Controls

1. *Describe the internal controls designed to ensure established work verification procedures are being properly employed.*

   Vermont's rules around the definitions of work activities are read and reviewed during new eligibility workers' training and reviewed periodically during supervisory case reviews. Eligibility supervisors and management teams also discuss work verification procedures during monthly meetings.

   All eligibility workers and supervisors have received training in the collection, documentation, and entry of hours for paid activities.

   Management, operations, and policy staff continue to work closely with staff responsible for Access and SPSS[2] programming to assure compliance with Vermont's Work Verification Plan.

   Vermont selects a stratified random sample of 100 cases each month during the following calendar month. The automated sampling is based on a computer-generated random start and a sampling interval calculated to select 25 ongoing two-parent families, and 75 other ongoing families. If there are fewer than 25 families in the stratum of two-parent families, all families in the stratum are selected for review. No newly approved families are included in the sample because they are not likely to have reported hours of work activity.

   Relevant documentation for each selected case is emailed to central office, or scanned into a central document storage system. Then it is reviewed for accuracy. Districts are contacted if further documentation or clarification on a case is needed. Hours recorded on the documentation are compared with the hours entered into Access

   Vermont will make the findings of the monthly sample review and the case management review available to ACF and other auditors in their review of Vermont's work verification system.

2. *Describe the processes used to identify and report all hours of employment.*

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[2] Vermont extracts data files from Access each month and converts them into SPSS files. These files are used for planning, evaluation, analysis, and reporting. See Section V for more on this process.

ESD conducts an automated quarterly match against the wage data collected by Vermont Department of Labor (VDOL) to administer unemployment compensation. Each quarter a file of Reach Up participants is matched against the wage data, and discrepancies are reported to ESD's Quality Control and Fraud Unit for follow up with employers and caseworkers.

ESD conducts a daily match of Reach Up participants against VDOL's in-state data on new hires. Notification is sent to eligibility workers by the Access system for follow up when a participant is identified as a new hire but there is no record of earnings in Access.

ESD conducts a monthly match of Reach Up participants against the National Directory of New Hires (NDNH). Discrepancies are reported to an individual assigned responsibility for follow up with employers and eligibility workers.

3. *Describe the internal controls to control for data errors, including transcription and coding errors, data omissions, computational errors, and compilation errors.*

See item 1, above, review of stratified random sample of cases. See also Section II, item 2, accurate reporting, and Section IV, item 2, consistency edits.

4. *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.*

In addition to the internal controls described elsewhere in this section and document, Vermont's Access system incorporates a module staging process and two testing environments to ensure the correct functioning of each new programming module and subsequent changes to it. A module is 'checked out' of the Access production environment by a programmer with changes to make in it. It can be checked out by only one programmer at a time, eliminating the possibility of two programmers making simultaneous changes to the same module. The programmer checks the module into the Access development environment, where programming changes are made and tested. This module is the same as the production environment except for modules being changed. Once the programmer is satisfied with the results of testing the changes, s/he checks the module into the Access certification environment. This environment is the same as the production environment except for modules with changes to test. A tester familiar with field operations and Access processing from a user's standpoint designs and carries out a more comprehensive testing plan to make sure the changes will work in the field. Only when the tester certifies the changes is the module checked back into the Access production environment.

5. *Describe any sampling and estimation techniques employed in data validation.*

Vermont reviews a stratified random sample of cases based on a computer-generated random start and a sampling interval calculated to select 100 ongoing cases each month. See item 1, above.

IV.   Verification of Other Data Used in Calculating the Work Participation Rates

Once a month, data about the circumstances of families receiving TANF and SSP-MOE during the previous month are extracted from the Access system and stored in SPSS data files. These data are used for ESD planning, evaluation, and analysis. They are also used to meet reporting requirements, including federal TANF and SSP-MOE reporting requirements.

Some data required for TANF and SSP-MOE purposes is transmitted to HHS in the same form it is extracted from Access. Other data are used to derive the data elements required by HHS.

Before transmitting the TANF and SSP-MOE data files, SPSS programming staff run the files through a series of edits that mimic the edits they will later undergo at the federal level.

1. *For each of the data elements used in calculating the work participation rates, describe the state's data validation procedures to ensure "complete and accurate" data reporting.*

    a. Reporting Month

        When the data are extracted, Access derives the first day of the previous month from the current date in the format YYYYMM01 and stores it in each record in the data extract. The data in the extract represent the detailed circumstances of the families in the Reach Up program during that previous month.

        SPSS then derives the *Reporting Month* from this data by dropping the two digits at the end.

    b. Stratum

        Vermont reports on its entire caseload. The *Stratum* for all cases is set in SPSS equal to '01.'

    c. Case Number

        The *Case Number* is the unique identifier assigned in Access by ADABAS, the Access data base management software, to the case. Once assigned, it can never be changed.

d. Disposition

Vermont reports on its entire caseload. The *Disposition* for all cases is set in SPSS equal to '1,' completed.

e. Type of Family for Work Participation

The *Type of Family for Work Participation* is derived in SPSS based on the number of work-eligible individuals in the family. Families with one work-eligible individual are coded '1,' those with two are coded '2,' and those with no work-eligible individuals are coded '3.'

Amount of 3SquaresVT (SNAP) benefits The amount of 3SquaresVT is extracted from Access, which stores the amount of food stamps assistance when it issues the benefit to the family.

f. Receives Subsidized Child Care

Payment and regulation subsidized child care in Vermont is administered by the Child Development Division (CDD) of the Department for Children and Families. A monthly file of child care payments is matched in SPSS against the file of Reach Up families for federal reporting. Values for *Receives Subsidized Child Care* are derived in SPSS based on these data.

g. Amounts of TANF and SSP-MOE Assistance

The *Amounts of TANF and SSP-MOE Assistance* are extracted from Access, which stores the amount of assistance when it issues benefits to the family.

h. Family Affiliation

A *Family Affiliation* value of '1,' member of the eligible family receiving assistance, is derived in SPSS on the basis of two Reach Up data elements extracted from Access: an individual's member code equal to '1' and person-needs-flag equal to 'P.' The member code is set to '1' in Access if the individual's income and resources must be considered in determination of the family's eligibility for assistance. The person-needs-flag is set to 'P' in Access if the individual's needs are considered in determining the amount of the family's assistance grant. Any parent or sibling of any eligible child who is also living with the family and who does not receive SSI must have a member code of '1' in Access before the family's eligibility for benefits is processed. Eligible caretaker relatives other than parents also have a member code of '1.'

Similarly, a *Family Affiliation* value of '2,' ineligible parent of eligible child, is derived in SPSS based on two separate sets of criteria. In the first instance, a value of '2' is assigned when an individual's member code = '1' and person-needs-flag is equal to 'F,' indicating that the individual's needs are excluded in determining the amount of the family's assistance grant. In the second instance, a value of '2' is assigned when an individual's member code equals '9,' which signifies an ineligible parent receiving SSI instead of Reach Up benefits. A parent must be coded in Access as the applicant head of household, the spouse of the head of household, or a parent of the applicant's child.

A *Family Affiliation* value of '3,' ineligible caretaker relative of an eligible child, is derived in SPSS based on the individual's person-needs-flag equal to 'F' and the relationship of the eligible children in the family to the head of household. If there is no parent living with the family, the caretaker relative must be entered as the applicant head-of-household in Access. The relationship of each family member to the head of household is also coded. When there is no eligible child coded as a son or daughter of the head of household, but there is at least one minor child related to the head of household, the head of household is identified as a caretaker relative. Needy caretaker relatives may choose to have their needs included in the family's assistance grant.

A *Family Affiliation* value of '4,' ineligible minor sibling of an eligible child, is derived in SPSS when the child's member code equals '8,' signifying a child receiving SSI instead of Reach Up benefits. Other minor siblings must be included in the eligible family before Access will determine the family's eligibility.

Under Reach Up rules, there is no instance in which a person would be assigned a *Family Affiliation* value of '5,' person whose income and resources are considered in determining eligibility. That person would have been assigned a value of '1,' '2,' or '4.'

i. Noncustodial Parent Indicator

    Since Vermont has not opted to include the noncustodial parent as part of the eligible family, the *Noncustodial Parent Indicator* is set to '2' in SPSS.

j. Date of Birth (Adult)

    Every individual's *Date of Birth* is extracted directly from the Person Master Index file in Access. Access invokes the following first-level edits, which

prevent the worker from leaving the Access screen on which date of birth is entered until the edit is cleared:

- Birth date in future not accepted.
- Birth date more than 120 years in past not accepted.
- Birth date not a valid date not accepted.

k. Relationship to Head of Household

Every individual's relationship to the applicant head of household is extracted directly from the Access data base. The Access codes are mapped to the TANF *Relationship to Head of Household* in the following way:

- Head of household '01', spouse '02', and grandchild '06' coded the same way in both systems.
- Access daughter or son '05' mapped to TANF '04.'
- Nephew or nieces '07', sibling '08', and first cousin '09' mapped to TANF '07.'
- Other eligible parent of applicant's child '03' mapped to TANF '10.'

Access editing and eligibility processing prevents an individual with any other relationship code from being included in the Reach Up assistance group unless the individual is an unrelated child of the parent of the applicant's child, determined by data entered and edited elsewhere in Access. In this case, the child would be coded friend '12' in Access and '09' in TANF. Access eligibility processing enforces Vermont Reach Up rules specifying that all parents and siblings of any eligible child in the assistance group must be included in the assistance group.

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l. Parent with minor child

The *Parent with Minor Child* code is derived in SPSS for all adults and minor heads of household based on the *Type of Family for Work Participation* for the case. If *Type of Family for Work Participation* equals '3,' *Parent with Minor Child* is set to '3.' If *Type of Family for Work Participation* is '2,' then *Parent with Minor Child* is set to '1.' If *Type of Family for Work Participation* is '1,' then *Parent with Minor Child* is set to '2.'

m. Work-eligible individual indicator

The *Work-Eligible Individual Indicator* is derived in SPSS for all case members with Access role codes of '01,' (applicant head of household), '02' (spouse of applicant head of household, and '03' (other parent of applicant's eligible child). The role code in Access denotes the individual's relationship to

the head of household. All adults and minor heads of household will have a role code of '01,' '02,' or '03.'

The values of *Work-Eligible Individual Indicator* are derived in SPSS as follows:

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

Derived in SPSS based on Reach Up member code equal to '1' (income and resources included in eligibility determination) and person-needs-flag = 'P' (recipient)

2   *Yes, a nonrecipient parent due to a sanction.*

Not applicable. Under Vermont rules, a sanctioned parent remains eligible for assistance.

3   *Yes, a nonrecipient parent due to a time limit.*

Not applicable. Under Vermont rules, a parent who has reached the 60-month time limit is eligible for assistance in a separate state program, along with the rest of the family.

4   *Yes, a nonrecipient parent receiving SSI (and state opts to include).*

Not applicable. Vermont has not opted to include parents ineligible for assistance because they receive SSI.

5   *Yes, a nonrecipient parent due to other reasons.*

Derived in SPSS based on Reach Up member code equal to '1' (income and resources included in eligibility determination) and person-needs-flag equal to 'F' (nonrecipient).

6   *No, a nonrecipient but not a parent.*

Derived in SPSS based on a role code equal to '01' (applicant head of household), person-needs-flag equal to 'F' (nonrecipient), and the absence of any eligible child with a role code equal to '05' (son or daughter).

7   *No, an ineligible alien due to immigration status.*

Reach Up member code equal to '1', '2' or '3' (income and resources included in eligibility determination) and an "immigrant status code of '01', '02' or '08'.

8   *Yes, a nonrecipient parent receiving SSI (and state opts to exclude).*

Derived in SPSS based on Reach Up member code of '9' (parent receiving SSI).

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

Derived in SPSS based on Reach Up member code equal '1' (income and resources included in eligibility determination and a Reach Up participation code of '11' (needed in the home to care for a disabled family member). A parent caring for a disabled family member attending school full-time does not qualify for this participation code.

n.   Date of birth (child)

Every individual's *Date of Birth* is extracted directly from the Person Master Index file in Access. Access invokes the following first-level edits, which prevent the worker from leaving the Access screen on which date of birth is entered until the edit is cleared:

- Birth date in future not accepted.
- Birth date more than 120 years in past not accepted.
- Birth date not a valid date not accepted.

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

Before transmission, the data are run through a series of edits in SPSS to identify the following inconsistencies:

a. *Type of Family for Work Participation* = '1' but no adult member.
b. *Work Participation Status* = '01' but no child younger than one.
c. *Work Participation Status* = '15' but single parent not younger than 20 or not attending secondary school.
d. *Work Participation Status = '16' but single parent not younger than 20 or not participating 20 hours per week in education directly related to employment.*
e. *Work Participation Status* = '06' or '17' but no child younger than six.
f. *Work Participation Status = '17' but single parent not participating at least 20 hours per week in work activities.*
g. *Type of Family for Work Participation = '3' but one or more adult members.*

h. *Type of Family for Work Participation = '2' but no adult member.*
i. *Type of Family for Work Participation = '2' but only one adult member.*
j. *Type of Family for Work Participation = '2' but more than two adult members.*
k. *Type of Family for Work Participation = '2' but Work Participation Status = '01' for one of the adult members.*

3. *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.*

   Access increments a counter to record the fact that a family with a single parent caring for a child younger than one has been disregarded from the work participation rate in a given month. Each month Access checks this counter to make this determination.

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

   Access sets a flag to record the fact that a family has been disregarded from the work participation rate because a parent has been sanctioned for fewer than four months. Each month Access makes this determination based on this monthly flag.

5. *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.*

   Access makes this determination each month by calculating the age of the youngest child in the family and determining the number of adults.

   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.

   See item 2, above.

6. *Describe any sampling and estimation techniques employed in data validation.*

   Not applicable.