

SUMMARY AND ANALYSIS OF ENGAGEMENT IN ADDITIONAL ACTIVITIES

Time Period: March 2011

Data Source: ACF-812

Program: Temporary Assistance for Needy Families (TANF)

Background:

Delaware's TANF program is administered by the Delaware Division of Social Services (DSS). DSS is publishing this report as required by statute.

Section 812 of the Claims Resolution Act of 2010 modifies section 411 of the Social Security Act by requiring that each State agency, the District of Columbia, and the Territories submit a Report on Engagement in Additional Work Activities. The report must be submitted for two reporting periods. The first reporting period is from March 1 through March 31, 2011 and the reports are due no later than May 31, 2011. The second reporting period is from April 1 through June 30, 2011 and the reports are due no later than August 31, 2011. For the Report on Engagement, with respect to each work-eligible individual in a family receiving TANF or SSP-MOE assistance during the reporting period, the States must collect and report the following information: (1) whether the individual engages in any activities that are directed toward attaining self-sufficiency and (2) if yes, the specific activities that (a) do not qualify as a countable work activity, but are otherwise reasonably calculated to help the family move to self-sufficiency or (b) that could be a countable work activity, but for the fact that either the work-eligible has not engaged in such activities for a sufficient number of hours; the work-eligible individual has reached a maximum time limit allowed for having participation in the activity, or the number of work-eligible individuals engaged in such activity exceeds a statutory limitation.

In addition to the reporting noted above, the Claims Resolution Act requires an eligible State shall publish on an internet website maintained by the State agency responsible for administering the State TANF program:

(A) a summary of the information submitted in the report:

(B) an analysis statement regarding the extent to which the information changes measures of total engagement in work activities from what was (or will be) reported by the State in the quarterly report for the comparable period; and

(C) a narrative describing the most common activities contained in the report that are not countable toward the State participation rates under section 407.

Summary:

When Congress created TANF in 1996, one of its goals was to ensure that families getting cash assistance received help in attaining self-sufficiency. Congress established the 'work participation rate' as the tool to measure whether or not a state meets this goal. Each State must meet an overall participation rate of 50% and a 90% participation rate for two-parent families or be subject to a financial penalty. The work participation rate focuses on 'work eligible individuals' (WEI) and whether or not the WEI is engaged in specific work activities.

A 'work eligible individual' is an adult (or minor parent head-of-household) recipient of TANF cash assistance or a non-recipient parent living with a child receiving cash assistance unless the parent is:

- a minor parent, but not the head-of-household;
- a non-citizen who is ineligible to receive assistance due to his or her immigration status;
- a Supplemental Security Income (SSI) recipient;
- a parent providing care for a disabled family member living in the home; or
- a parent receiving Social Security Disability Insurance (SSDI) benefits

For a WEI to count towards the work participation rate, the individual must have verified participation in countable activities for a specified number of hours each month. Parents with children 6 years of age and older, must participate in a countable activity for an average of 30 hours each month. Single caretaker parents with children under 6 years old must average for 20 hours a week. Families with two parents must engage in an average of 35 hours a week.

Countable core work activities are limited to:

- Unsubsidized employment;
- Subsidized employment;
- Community work experience;
- Community service;
- On-the-job training;
- Vocational education/training; and
- Job search/job readiness

WEIs with a 30 hour requirement must participate in the above activities for at least 20 hours and then also participate for 10 more hours in the above and/or:

Job skills training;

Education directly related to employment; and

Satisfactory attendance of Secondary School/GED

States are restricted in their ability to count some activities toward the work participation rate due to statutory limits.

States may not count toward their participation rate:

- Hours of vocational education after an individual has been engaged in vocational education for twelve-months.
- Job search/job readiness hours after six weeks in a twelve-month period.
(Because Delaware meets the definition of 'needy state' under 45 CFR § 260.30, the job search/job readiness limit is twelve weeks in a twelve-month period.)
- Job search/job readiness hours that occur in a week that follows four consecutive weeks of job search/job readiness activities.

All other activities are considered 'non-countable'.

The Division of Social Services reported activity data for a sample of TANF clients. The sample size was 177 Work Eligible Individuals.

The initial data collection considered only WEI cases active during March 2011 and only captured verified countable activities which had been entered in the Delaware Client Information System (DCIS) prior to the end of March 2011. The results of the initial data pull revealed:

- 46 (25.99%) clients were determined to be meeting the federal participation requirement.
- 36 (20.34%) were not meeting participation, but had verified hours
- 68 (38.41%) were exempt from participating
- 27 (15.25%) had no verified hours and were not exempt.
- The estimated Work Participation Rate for this sample was 42.20%

To gather the additional information required for the ACF-812, the TANF employment and training vendors were asked to provide additional information for clients who had not met participation. Specifically the vendors were asked to report any hours that were entered in DCIS after the initial data pull for March, hours of countable activities clients claimed to perform but for which verification was not provided, and hours that were not countable but would assist in achieving self sufficiency. Additionally hours that are not reported on the TANF data report but are verified countable activities were identified. This additional data collection revealed that:

- 9 clients (5.08%) reported unverified hours
- No hours were collected by the vendors for non-countable activities.
- 82 clients (46.33% of the entire sample and 75% of non-exempt clients) completed some hours.
- 19 clients (10.73%) engaged in hours in the federally defined work activities that are not reported by Delaware in the TANF data report
- If the unreported hours and unverified hours were used in determining the Work Participation Rate, 4 additional clients would have met their monthly participation requirement. Including these 4 clients would raise the sample Work Participation Rate to 45.87%

95 clients were determined to have no hours during the month. The reasons for non- participation are as follows:

- Agency failed to engage client: 2 (2.1%)
- Single custodial parent with child under 12 months, exempt from participation: 46 (48.42%)
- Individual in process of being sanctioned: 20 (21.05%)
- State exempt due to illness or disability: 21 (22.11%)
- Exempt under domestic violence waiver 1 (1.05%)
- Other: 5 (5.26%)

Analysis Statement:

With the caveats that the data is sample data for a 1 month period and that Employment and Training vendors typically do not collect information about non-verified and non-countable activities the following trend is suggested. As noted in the summary above and with the caveats mentioned, including unreported and unverified hours in the calculation of the Work Participation Rate would result in an estimated 3.67% increase in the Work Participation Rate.

Narrative describing the most common activities contained in the report that are not countable toward the State participation rates.

Delaware did not report any non-countable activities.

To preserve activities that are time limited, Delaware does not report hours of vocational education and job search/job readiness hours if those hours are not needed for the client to meet participation or the hours are not sufficient to meet participation. In this sample 18 clients had 646 hours of job search/job readiness that would not have been reported or counted against a client's limit for those activities.