

**Temporary Assistance to Needy Families (TANF)  
ACF-812 Report on Engagement in Additional Work Activities  
Summary & Analysis  
April - June 2011 Reporting Period**

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**Prepared by  
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**Statutory Reporting Requirement**

States receiving Temporary Assistance for Needy Families (TANF) funding are required to transmit data to the U.S. Department of Health and Human Services Administration for Children and Families (ACF) on individuals who meet the federal definition of a “work eligible” individual (WEI) to determine whether the State is meeting the WEI Work Participation Rate.

The Claims Resolution Act of 2010 authorized an extension through September 30, 2011 to the funding of the TANF financial assistance program block grant authorized under Part A of Title IV and Section 1108(b) of the Social Security Act. Sec. 812 *Modifications to TANF Data Reporting* includes new reporting requirements that mandate states to submit additional data on WEIs that did not meet participation requirements. The additional reporting requirements were effective for the data transmitted on the WEIs that received TANF during March 2011. This report is a summary and analysis of the data submitted to ACF on individuals for the report period of April – June 2011.

<b>Overview of the Number of Cases and WEIs Reviewed</b>	
Cases Reviewed	
Types Reviewed	
Closed	204
Ongoing Cases	609
Newly-opened cases	156
<b>Total Cases Reviewed</b>	<b>969</b>
Included in Work Participation Rate	
Ongoing Cases	609
Newly-opened cases	156
Subtotal	765
Minus cases that did not include a WEI	-199
<b>Total Cases Included in Work Participation Rate</b>	<b>566</b>
WEIs Reviewed	*567
Minus WEIs where federal disregards and deeming rules applied	-130
<b>Total WEIs Included in Work Participation Rate</b>	<b>437</b>

\*One case included 2 adults (1 exempt due to illness or disability of child and 1 required to participate in work activities)

## Work Participation Rate Calculation

The Office of Quality Assurance (OQA) reviewed 969 cases with children that received financial assistance through the Family Independence Program (FIP) funded by the TANF block grant during the sample months of April - June 2011 or whose FIP funding was terminated the month prior to the sample month.

Month	Sample Population	Cases Reviewed		
		Closed	Ongoing	Newly-Opened
April	65,080	68	203	52
May	65,412	68	203	52
June	64,995	68	203	52
Total	195,487	204	609	156

Of the 765 combined ongoing and newly opened cases, 566 were used by ACF to calculate Michigan's Work Participation Rate and required the submission of additional data regarding the WEIs work participation activities. Michigan's unofficial Work Participation Rate for April - June 2011 is 26.8%. It will remain unofficial until ACF confirms the rate.

The work participation rate is based on the number of cases with individuals who meet the federal definition of a WEI and also meet work participation requirements. In order to meet work participation requirements, OQA must verify participation in one or more of the following activities for a combined minimum participation of 20 hours per week for a single pregnant women with no other children or a single parent household that includes a child under the age of six and 30 hours per week for all other single parents:

- Unsubsidized employment
- Subsidized private or public sector employment
- Work experience
- On-the-job training
- Job search and job readiness assistance
- Community service programs
- Vocational educational training
- Providing child care service for an individual participating in a community service program.

An individual in the FIP group who is the caregiver of a child less than twelve months old and/or an individual in the FIP group who is within the first three months of postpartum period are temporarily disregarded from participation.

Michigan's Jobs Education & Training (JET) Program provides occupational and training services for WEIs receiving TANF-funded public assistance to allow transition into stable employment and self-

sufficiency. Work-ready WEIs are referred to the JET Program for employment and training services and assignments, with an emphasis on federally countable work participation activities. The State of Michigan requires non-deferred, work-ready WEIs to participate at the federal minimum level with a maximum of up to 40 hours per week, subject to modification when necessary to accommodate disabilities under the Americans with Disabilities Act and Section 504, or other barriers. The Michigan Works! Agencies (MWAs) monitor and report each WEI’s participation in activities to the Michigan Department of Human Services (DHS). The OQA reviews the MWA and DHS records for each WEI to determine whether the WEI meets work participation requirements.

The 566 cases reviewed for work activities included 567 WEIs. One case contained two adults: one exempt due to illness or disability of child, the other was required to participate in work activities. Of these cases, 119 met their participation requirements. Federal disregards and deeming rules were applied to 130 cases.

### Individuals Who Did Not Meet Participation Requirements

Of the 437 individuals remaining after the disregard and deeming rules were applied, 318 WEIs did not meet the participation requirements. Of the 318 WEIs, 151 participated in activities that were not reported as countable toward their work participation requirements. The number of WEIs and the reasons for not reporting them as countable activities are:

- 33 WEIs – the State chose to not report some or all of their activities
- 141 WEIs – insufficient hours of participation in activities
- 5 WEIs – no verification of the activity and/or the hours of participation
- 28 WEIs – activities exceed statutory limit
- 1 WEI – activity did not qualify under the Social Security Act

Activity	Reason Activity Did Not Count				
	Chose Not To Count	Insufficient Hours	No Verification	Exceeds Statutory Limit	Does not Qualify Under Social Security Act
Unsubsidized Employment	0	60	3	0	0
Work Experience	1	5	1	0	0
On-the-job training	1	0	0	0	0
Job Search/Job Readiness Assistance	29	55	1	24	0
Community Service Program	1	14	0	0	0
Vocational Educational Training	1	5	0	4	0
Job Skills Training Directly Related to Employment	0	2	0	0	0
High School or GED	0	0	0	0	1
<b>Total</b>	<b>33</b>	<b>141</b>	<b>5</b>	<b>28</b>	<b>1</b>

Note: WEIs can participate in more than one activity in a week and, therefore, have more than one non-countable reason and more than one non-countable activity.

Some of the activities in which WEIs are engaged may not be reported to ACF because they are done beyond the TANF work requirements but promote participants' self-sufficiency under the state's up to 40 hours per week rule. The State chose not to report participation in Job Search/Job Readiness Assistance (JS/JR) for 29 WEIs and Vocational Educational Training (VET) for one WEI. JS/JR and VET have statutory limits to the amount of countable time a WEI can participate. Twenty-four (24) WEIs participated in JS/JR beyond the statutory limit and four participated in VET beyond the statutory limit.

The MWAs use the state's One-Stop Management Information System (OSMIS) to track and record JET participants' activity assignments including required, planned, and actual hours of participation in countable work activities. However, actual hours of activities for assigned components which are beyond the work participation activities defined by TANF regulations are often not recorded specifically, and therefore are not reported.

An activity code called Other Non-Countable Hours (ONCH) was added to OSMIS that the MWAs primarily use to capture activities not reported. The ONCH code is used for participation in JS/JR and VET activities when MWAs do not want the activities to apply towards the individual's federal work participation requirement due to durational limits or the hours of additional participation are beyond the minimum required hours.

One hundred and twenty-two (122) WEIs participated in activities, but the number of hours was insufficient to meet the 20/30 hour requirement and there was no verification of participation in activities for 5 WEIs. One WEI participated in High School or GED completion which does not qualify as a countable core activity under the Social Security Act but does move the family toward self-sufficiency.

### **Individuals Who Did Not Participate In Any Activity (core or noncore)**

Of the 448 WEIs that did not meet the participation requirements, 297 (66.29%) did not participate in any countable or non-countable activity that moved them toward self-sufficiency. The principle reasons were:

- 20.7% (93) are individuals the State/Local agency has failed to engage
- 19.6% (88) are individuals disregarded from the participation rate because they were caring for a child under age one
- 9.8% (44) are non-compliant and are in the sanction process
- 6.0% (27) have zero hours of participation but are in other statuses
- 3.3% (15) are exempt by the State due to a good cause
- 2.2% (10) are exempt by the State due to illness or disability of child or other family member
- 2.0% (9) are exempt due to other State policies
- 1.1% (5) are under a domestic violence deferral
- 0.7% (3) are exempt due to illness or disability
- 0.4% (2) have relocated from one local jurisdiction within State to another
- 0.2% (1) have been assigned an activity that has not yet begun

## **Individuals Who Are Deferred – Activities Not Reported**

Many of Michigan's WEIs often face barriers that limit their ability to immediately enter into employment-related activities. The State of Michigan requires non-deferred, work-ready WEIs to participate at the federal minimum level with a maximum of up to 40 hours per week, subject to modification when necessary to accommodate disabilities under the Americans With Disabilities Act and Section 504, or other barriers. WEIs with significant or multiple barriers may be temporarily deferred from the JET Program. Every effort is made to engage individuals who are deferred in activities that help them overcome barriers, increase their full potential, and prepare them for involvement in countable work participation components through the JET Program or other employment service provider as soon as possible.

Individuals who are temporarily deferred from JET are assigned to family strengthening activities, which include self-improvement or other activities that will assist the client to overcome barriers so s/he may participate in employment services or otherwise strengthen the family while supporting progress towards self-sufficiency. These individuals in these activities are tracked by the DHS office. The family strengthening activities are not counted toward federal participation requirements because they are outside the strict definitions of countable work activities, and therefore often go unreported.

The most frequently assigned family strengthening activities often include, but are not limited to the following:

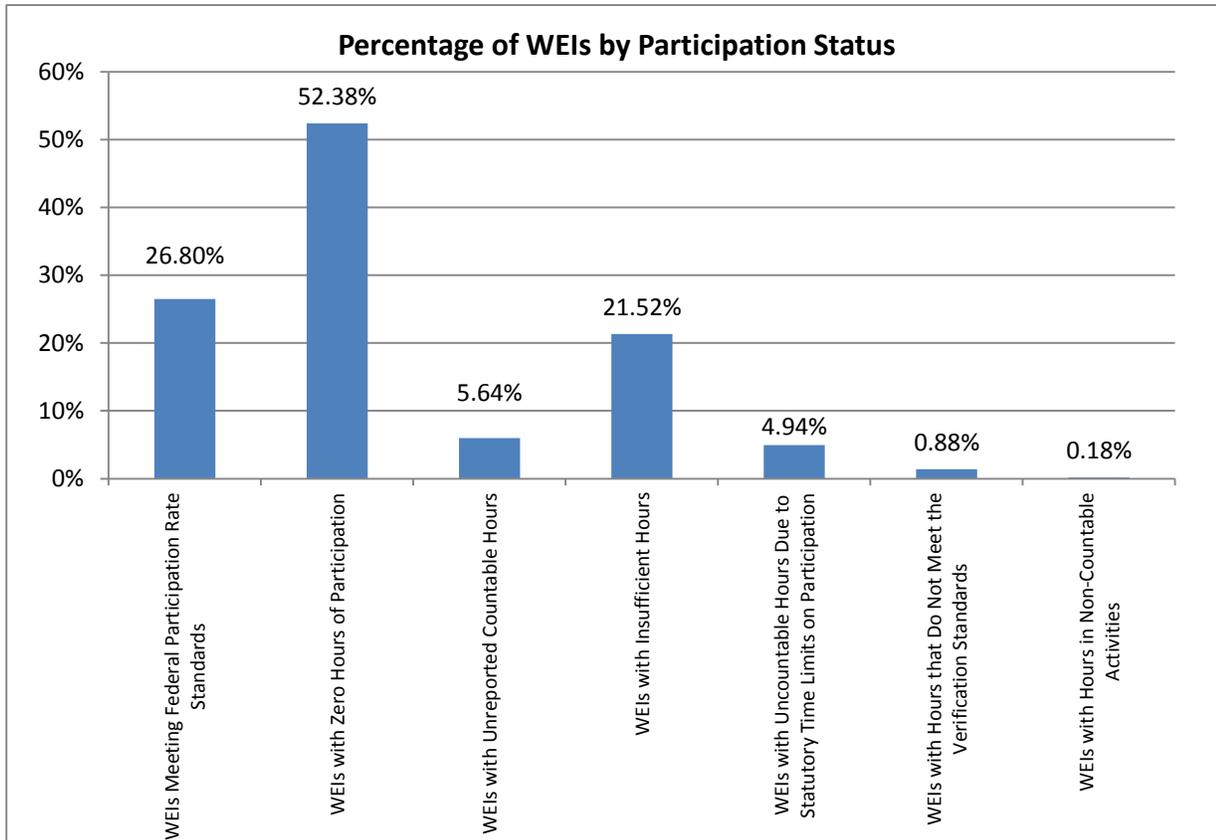
- Parenting programs or classes
- Counseling (including mental health, substance abuse, marital, family)
- Life skills programs or classes (often offered by community-based organizations)
- Conflict resolution programs or classes
- Arranging child care or home care for a family member with disabilities
- Attendance in a support group
- Other activity that would assist the client in achieving self-sufficiency

The DHS monitors family strengthening activities with a standardized form and records the client's participation in the Family Self-Sufficiency Plan (FSSP). Any of these activities that are made part of the FSSP must be appropriate to the individual's and family's needs and circumstances including disability-related needs or limitations.

## **Summary and Analysis**

The 969 cases reviewed by OQA included 567 WEIs that were used by ACF to calculate Michigan's Work Participation Rate and required the submission of additional data regarding the WEIs work participation activities. Of the 567 WEIs, 119 met their participation requirements.

The status of the remaining WEIs is provided in the following chart. WEIs can participate in more than one activity in a week, and therefore, have more than one non-countable reason and more than one non-countable activity.



Michigan updated the OSMIS to allow entry of actual hours of participation for non-countable JS/JR and VET activities in April - June 2011. Most barrier resolution and additional work-skill enhancement activities performed can now be captured through the use of Other Non-Countable Hours of Job Search/Job Readiness activity.

Michigan’s unofficial Work Participation Rate (WPR) for April - June 2011 is 26.8%. The following changes in Michigan’s practices could increase the number of WEIs meeting the work participation requirements to 189 and increase Michigan’s WPR to approximately 43.2%.

Changes to Policies and Procedures	Additional WEIs Meeting WP Requirements
Ensure verification of participation is included in MWA and/or DHS records	5
Ensure the percentage of WEIs the State agency failed to engage is less than 5%	65