

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

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**Prepared by
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Division of Adult & Family Policy & Office of Quality Assurance
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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 these individuals.

Overview of the Number of March Cases and WEIs Reviewed	
Cases Reviewed	
Types Reviewed	
Closed	68
Ongoing Cases	203
Newly-opened cases	52
Total Cases Reviewed	323
Included in Work Participation Rate	
Ongoing Cases	203
Newly-opened cases	52
Subtotal	255
Minus cases that did not include a WEI	-50
Total Cases Included in Work Participation Rate	205
WEIs Reviewed	211
Minus WEIs reported in error on ACF-812 report	-5
Total WEIs Reviewed	*206
Minus WEIs where federal disregards and deeming rules applied	-53
Total WEIs Included in Work Participation Rate	153

*One case included 2 adults (1 disregarded due to caring for an infant and 1 required to participate in work activities)

Work Participation Rate Calculation

The Office of Quality Assurance (OQA) reviewed 323 of the 65,898 cases with children that received financial assistance during March 2011 through the Family Independence Program (FIP) funded by the TANF block grant. Michigan stratifies its monthly sample to include 68 closed cases, 203 ongoing cases, and 52 newly-opened cases.

Of the 255 combined ongoing and newly opened cases, 205 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 March 2011 is 30.1%. 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 have met 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 parent household that includes a child under the age of six, and 30 hours per week for a single parent household whose youngest child is six years old or older:

- 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 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 205 cases reviewed for work activities included 206 WEIs. One case contained two adults: one disregarded due to caring for an infant, the other was required to participate in work

activities. After applying the federal disregard and deeming rules, 153 cases were included in the work participation rate calculation for March. Of these cases, 46 met their participation requirements.

Individuals Who Did Not Meet Participation Requirements

Of the 206 individuals reviewed, 160 WEIs did not meet the participation requirements. Of the 160 WEIs, 53 participated in activities that were not reported as countable toward their work participation requirements. The number of WEIs and the reasons for not reporting activities as countable are:

- 14 WEIS - the State chose not to count the activities
- 53 WEIS - insufficient hours of participation in the activities
- 13 WEIS - no verification of the activity and/or the hours of participation

Activity	Reason Activity Did Not Count		
	Chose Not To Count	Insufficient Hours	No Verification
Unsubsidized Employment	0	23	0
Subsidized Public Sector Employment	0	1	0
Work Experience	0	3	1
On-the-job training	0	0	1
Job Search/Job Readiness Assistance	14	18	1
Community Service Program	0	3	2
Vocational Educational Training	0	5	4
Satisfactory School Attendance	0	0	4
Total	14	53	13

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

Some of the activities in which JET participants are engaged may not be reported to ACF because they are done beyond the TANF work requirements, but still include assignments made to promote participants' self-sufficiency under the states up to 40 hours per week rule. Job Search/Job Readiness Assistance (JS/JR) and Vocational Educational Training (VET) have statutory limits to the amount of countable time a WEI can participate. Seven WEIs participated in JS/JR 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.

A new activity code added that MWAs primarily use to capture activities not reported is called Other Non-Countable Hours (ONCH). The ONCH Activity is most often used for participation

in Job Search/Job Readiness (JS/JR) and Vocational Educational (VET) activities that are in addition to or beyond the statutory limits. In order to preserve availability of countable hours of such work activities, the ONCH Activity is also often used to indicate participation in activities that the MWAs do not want to apply towards the individual’s federal work participation requirement because of durational limits or because the hours additional participation are beyond the minimum required hours.

One WEI participated in High School or GED completion which does not qualify as a countable 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 160 WEIs that did not meet the participation requirements, 106 did not participate in any countable or non-countable activity that moved them toward self-sufficiency. The principle reasons were:

Reason	Number of Individuals
Individual was assigned to a work activity that had not yet begun	1
State agency failed to engage the individuals	31
Individuals were temporarily disregarded from participation due to being a custodial parent with a child under age 1	45
Individuals were in the process of being sanctioned for failing to cooperate with participating in activities	10
Individual was State exempt due to illness or disability	1
Individual was State exempt due to illness or disability of a child or other family member	1
Individuals who had a good cause exemption	3
Individuals who had an “other” type of State exemption	3
Individuals who had an “other” reason	11
Total	106

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. 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

Michigan’s unofficial Work Participation Rate (WPR) for March 2011 is 30.1%. The following changes in Michigan’s practices would increase the number of WEIs meeting the work participation requirements to 62 and increase Michigan’s WPR to approximately 40.5%.

Changes to Policies and Procedures	Additional WEIs Meeting WP Requirements
Ensure verification of participation is included in MWA and/or DHS records	6
Ensure the percentage of WEIs the State agency failed to engage is less than 5%	10

DHS and the Workforce Development Agency, State of Michigan (WDASOM), which is the employment and training administrative agency for the MWAs, are collaborating to prevent missing verifications and failing to engage participants from occurring in the future.

In response to the additional TANF reporting requirements implemented through the Claims Resolution Act of 2010, Michigan updated the OSMIS to allow entry of actual hours of participation for non-countable JS/JR and VET activities in March 2011. Most barrier resolution and additional work-skill enhancement activities performed through the JET Program can now be captured through the use of Other Non-Countable Hours of Job Search/Job Readiness activity. Therefore, the incidence of participation activities that are not reported should decrease substantially in future work participation reports.