

SUMMARY AND ANALYSIS OF ENGAGEMENT IN ADDITIONAL ACTIVITIES

Time Period: April, May, and June 2011

Data Source: ACF-812

Program: Temporary Assistance for Needy Families (TANF)

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 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 for 3 months. The chart below details the sample size per month.

Month	Eligible Families (with 1 WEI)	Sample Size (# of Clients)
April 2011	2286	181
May 2011	2304	177
June 2011	2246	178

The initial data collection considered only WEI cases active during April, May, and June 2011 and only captured verified countable activities which had been entered in the Delaware Client Information System (DCIS) prior to the end of the month immediately following the sampled month. The chart below summarizes participation by client group for the initial data collection

Initial Data Collection: Summary of Participation in Countable Activities by Sampled Clients								
	April 2011		May 2011		June 2011		For the 3 month period	
Description of Client Participation	Number of clients	Percent of Sample	Number of clients	Percent of Sample	Number of clients	Percent of Sample	Number of clients	Percent of Sample
Mandatory to participate and determined to be meeting the federal participation requirement	55	30.39%	59	33.33%	52	29.21%	166	30.97%
Not meeting the federal participation standard, but had verified hours	38	20.99%	29	16.38%	31	17.42%	98	18.28%
Exempt from participating	67	37.02%	72	40.68%	77	43.26%	216	40.30%
Had no verified hours and were not exempt	21	11.60%	17	9.60%	18	10.11%	56	10.45%

The estimated Work Participation Rate for the initial data collection is presented below.

Estimated Work Participation Rate Based on the Initial Data Collected for the Sampled Months				
	April 2011	May 2011	June 2011	For the 3 month period
Work Participation Rate	48.25%	56.19%	51.49%	51.88%

To gather the additional information required for the ACF-812, the TANF employment and training programs were asked to provide additional information for clients who had not met participation. Specifically the programs were asked to report any hours that were entered in DCIS after the initial data collection, 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, verified countable activity hours not reported on the TANF data report were identified. The information gathered from this second data collection is summarized in the following charts.

Clients with Unverified Hours of Countable Activities				
	April 2011	May 2011	June 2011	For the 3 month period
Number of Clients	16	10	16	42
Percent of Sample	8.84%	5.65%	8.99%	7.84%

Clients Who Had Verified Countable Hours, But The Hours Were Not Reported in the TANF Data Report By the State				
	April 2011	May 2011	June 2011	For the 3 month period
Number of Clients	18	15	8	41
Percent of Sample	9.94%	8.47%	4.49%	7.65%

Clients Identified by the Employment and Training Programs as Having Engaged in Activities Which While Not Countable for Federal Participation Rate Purposes Would Support Self-Sufficiency				
	April 2011	May 2011	June 2011	For the 3 month period
Number of Clients	1	1	0	2
Percent of Sample	0.55%	0.56%	0.00%	0.37%

Delaware chooses not to report on the TANF Data Report countable hours that are time limited by federal regulations and do not benefit the client in meeting their participation requirement. The following chart shows the hours not reported for this sample group.

Countable Hours not Reported as a Result of State Policy								
Activity:	April 2011		May 2011		June 2011		For the 3 month period	
	Number of Hours	Number of clients	Number of Hours	Number of clients	Number of Hours	Number of clients	Number of Hours	Number of clients
Vocational Education	28	2	0	0	0	0	28	2
Job Search Job readiness	372	16	374	15	253	8	999	39

The next chart summarizes the impact on the Work Participation rate if the additional hours collected were included in the calculation.

Change in the Work Participation Rate when unverified, non-countable, and state unreported hours are included in the Work Participation Rate (WPR)				
	April 2011	May 2011	June 2011	For the 3 month period
initial WPR	48.25%	56.19%	51.49%	51.88%
WPR including unverified, unreported and non-countable hours	57.02%	60.95%	59.41%	59.06%
Difference	8.77%	4.76%	7.92%	7.19%
Number of additional clients meeting participation requirement	10	5	8	23

The following chart shows the engagement in any activities by nonexempt clients. In addition to clients with verified countable hours the calculation for this chart includes clients who had non-countable hours and non-verified hours.

Percentage of Non-Exempt Clients Who Engaged in Any Activity Hours				
	April 2011	May 2011	June 2011	For the 3 month period
Percent engaged	90.35%	88.57%	90.10%	89.69%

No hours were collected for 272 clients during the sample period. The chart below summarizes the reason for non-participation for these clients.

Clients With No Reported Hours During The Sampled Months								
Reason	April 2011		May 2011		June 2011		For the 3 month period	
	Number of clients	Percent of sample	Number of clients	Percent of sample	Number of clients	Percent of sample	Number of clients	Percent of sample
Single custodial parent with child under 12 months, exempt from participation	46	25.41%	47	26.55%	57	32.02%	150	27.99%
State exempt due to illness or disability	21	11.60%	25	14.12%	20	11.24%	66	12.31%
Individual in process of being sanctioned	17	9.39%	15	8.47%	14	7.87%	46	8.58%
Agency failed to engage client	2	1.10%	0	0.00%	1	0.56%	3	0.56%
Work activities received too late for inclusion in report to HHS	1	0.55%	0	0.00%	2	1.12%	3	0.56%
Other	1	.55%	2	1.13%	1	0.56%	4	0.75%
Total	88		89		95		272	

Analysis Statement:

With the caveats that the data is sample data for a 3 month period and the employment and training Programs 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 7.19% increase in the Work Participation Rate for the sample period.

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

The Employment and Training Programs identified 2 clients who reported being engaged in non-countable activities. One client was involved special training for the care of her daughter; the other client was engaged in activities mandated by the court.

To preserve activities that are time limited by statute, Delaware does not report hours of vocational education and job search/job readiness hours if those hours are not needed by the client to meet participation or the hours are not sufficient to meet participation. For this sample 39 clients had 999 hours of job search/job readiness that were not reported in the TANF Data Report. Additionally 28 hours of vocational education hours were not reported for 2 clients.