

Summary Report on Engagement in Additional Work
Activities
(ACF-812)

Florida Temporary Assistance for Needy Families Program (TANF)

Report Period: March 1—March 31, 2011

Florida Department of Children and Families

Introduction:

This report represents the first of two new reports on TANF work activities mandated under Section 812 of the Claims Resolution Act of 2010. The report covers the period of March 1 through March 31 and is a comprehensive examination of new, extensive data not currently reported on existing quarterly reports. The report represents additional data gathered in response to the following two broad queries:

- Whether the work-eligible individual engages in any activities that are directed toward attaining self-sufficiency, and
- 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 individual 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 count; or the number of work-eligible individuals engaged in such activity exceeds a statutory limitation.

For this report, the two state agency partners that administer Florida's TANF Program, the Department of Children and Families (DCF) and the Agency for Workforce Innovation (AWI) and the network of the state's 24 Regional Workforce Boards (RWB), have collaborated to mine the in-depth breakdown of all participant activity—countable and non-countable, as well as non-participation and most prevalent reasons for non-participation from their respective data bases and case records. The roles of the partners and the information available from each automated system are as follows:

- Eligibility Determination, Cash Assistance Payments and Federal Reporting: The **DCF** is the recipient of the TANF block grant and is responsible for determining eligibility for TANF cash assistance, issuing cash assistance payments to TANF-eligible families and submitting all fiscal and programmatic reports. Eligibility specialists record applicant and participant data directly into DCF's automated eligibility system, Florida Online Recipient Integrated Data Access (FLORIDA). These data are maintained on FLORIDA and used in concert with AWI workforce data to generate federal participation reports.
- Work Activities Administration and Accountability: The **AWI** contracts for all workforce activities and services through RWBs and is the State agency responsible for ensuring that workforce funds and programs are appropriately administered and monitored for accountability. Regional Workforce Board program staff enter work activity data directly into its statewide workforce data

entry system. This system maintains the data, and DCF extracts required elements from it for monthly and quarterly participation reports.

Context of Work Participation:

Federal law requires that each state receiving a TANF Block Grant must meet specific work participation rates—50% for all families receiving assistance and 90% for two parent families receiving assistance—as measures of success and to avoid monetary penalties. The participation rate is calculated using the number of hours work-eligible individuals participate in allowable or “countable” activities as mandated by 45 CFR, part 261 for the requisite number of hours for each family type:

Type of Family	Work participation Hours Required
Single work eligible parent with a child under age 6	20 hours weekly in core work activities.
Other single work-eligible parent families or two work-eligible parent families where one parent is disabled	30 hours weekly with at least 20 hours in core activities.
Married teen or teen head of household under age 20.	Maintains satisfactory attendance at secondary school or the equivalent or participates in education related to employment for at least 20 hours weekly.
Two work-eligible parent families who do not receive federally subsidized child care	35 hours per week (total among both parents) with at least 30 hours in core activities.
Two work-eligible parent families who receive federally subsidized child care	55 hours per week with at least 50 hours in core activities

Work Activities:

Twelve allowable work activities are described in law and regulations. Nine of the activities are “core” activities and may be used to satisfy any of the average weekly participation requirements. The other three activities are “supplemental” in that they may only be used to satisfy the work activity requirement after the “core” requirement is met.

Core Activities

- Unsubsidized employment
- Subsidized private sector employment
- Subsidized public sector employment
- Job search and job readiness (limited to not more than 6 weeks in a federal fiscal year with not more than 4 weeks consecutive).
- Community service
- Work experience
- On-the-job training
- Vocational educational training (limited to 12 months for an individual), and
- Caring for a child of a recipient in community service

Supplemental Activities

- Job skills training directly related to employment
- Education directly related to employment (for those without a high school or equivalent degree)
- Completion of a secondary school program

Definition of Work-eligible Individual:

A work-eligible individual is an adult (or minor child head-of-household) who receives TANF cash assistance or a non-recipient parent living with a child receiving cash assistance. Therefore, even when the work-eligible adult has been sanctioned due to non-compliance with work requirements, but the assistance has been continued to the children under a protective payee as allowed for a second and third sanction in Florida, the adult remains work-eligible and is counted in the participation rate. The only individuals that federal law exempts from the work-eligible status are: a minor parent, not head of household; a non-citizen who is ineligible to receive assistance; at state option, a recipient (not an applicant) of Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI); and a work-eligible parent providing care for a disabled family member in the home with medical documentation.

Florida's Participation Rate History:

Through a combination of participation in countable work activities and substantial caseload reduction credit applied by the Administration of Children and Families (ACF), Florida has met the mandated participation rate each program year. During the recent recession with Florida's unemployment rate well above 12%, the state was able to meet the requirements through a provision in the American Recovery and Reinvestment Act of 2009. The provision had the effect of a "hold harmless" by allowing states to use the higher caseload

reduction credit earned in either 2007 or 2008 to be applied to participation rates in 2009, 2010 and 2011. This provision will expire September 30, 2011.

ACF notified Florida April 22, 2011 that by the application of past caseload reduction credit to the 2009 participation data, the state had a target of 0.0 % for both the all family and the two parent rate. The state exceeded both target rates at 46.1 % for all families and 54.4 % for two parent families.

Florida's prospective participation rate for March using the entire caseload is based on 6,815 families with a work-eligible individual who met their participation requirement out of 13,275 families with a work-eligible individual receiving assistance for a non-weighted participation rate of 51.3%. However, Florida submits the TANF Data Report based on a sample, and the state has used the same selected cases for the March ACF 812 report as for the quarter ending March 31. In accordance with instructions issued with TANF-ACF-PI-2011-03, Florida's prospective weighted participation rate for all families for March is 50.1%

Results of March Sample:

While the participation rate is computed on families, this report focuses on activities of work eligible individuals, and some of the families in the sample have two work eligible individuals. Florida's sample of 128 work-eligible families has a higher representation of two-parent families and includes 189 work-eligible individuals.

- Of the 189 work-eligible individuals in the sample, 75 work-eligible individuals (39.7%) participated in countable work activities for a sufficient number of hours to count toward the work participation rate, and 114 (60.3%) did not have a sufficient number of hours to count toward the work participation rate.
- Of the 114 work-eligible individuals who did not count in the work participation rate, 48 (42.1%) individuals participated in at least one countable work activity during the month of March.
- Florida had seven work-eligible individuals in work activities that the state chose not to report in order to preserve the hours in a time limited activity.
- The state had 32 of the 114 work-eligible individuals who participated in a countable work activity, but had insufficient hours to meet the work requirement, or 28.1%. (Some individuals were in multiple activities.)
 - Unsubsidized Employment 7
 - Work Experience 5
 - OJT 1

- Job Search 4
 - Community Service 10
 - Voc Ed 1
 - Job Skills Training 12
 - School Attendance 3
- There were three work-eligible individuals of the 114 who participated in a countable work activity that did not count toward work participation because the hours exceeded the statutory limit for reporting the hours.
 - Job Search 2
 - Voc Ed 1
 - Two work-eligible individuals of the 114 participated in countable work activities, but the state could not meet Federal verification standards for their inclusion in the participation count. (Some individuals were in multiple activities.)
 - Unsubsidized Employment 2
 - Job Search 1
 - Florida had 21 work-eligible individuals, 18.4% of the 114, who did not participate in countable work activities, but who did participate in activities to help move the family toward self-sufficiency. (Some individuals were in multiple activities.)
 - Adult Basic Education 3
 - Work Supports 2
 - Assessment 17
 - Florida had a total of 62 of the 114 work-eligible individuals not engaged in a countable work activity or a non-countable work activity to move the family toward self-sufficiency (54.4%)

Principal Reason for Nonparticipation:

- Family's first month on assistance and no work activity assigned 1
- Individual assigned to a work activity that has not yet begun 16
- State /local agency has failed to engage individual 4
- Individual relocating from one local jurisdiction to another 2
- Family disregarded from participation rate 8
- Individual in process of being sanctioned 11
- State exempt, due to illness or disability of WEI 5
- State exempt due to domestic violence waiver 1
- Other (One parent in two-parent family did all hours) 14

Analysis:

Because Florida's automated systems are not programmed to capture much of the information required for this report, and the state had insufficient time and resources to contemplate systems changes, Florida used a variety of investigative methods to "drill down" for activity information on each of the sample members. We scrubbed data elements in each system for any hours that might have been miscoded or overlooked, searched the systems' running record comments for any information in discussions with participants, used local program office case records and even made phone calls and sent emails to individual case managers at the local level requesting that they track down and/or re-interview persons, if possible, seeking additional information.

This exercise did not change the results of information submitted in Florida's Quarterly Report (ACF 199). Florida allows the RWB's the maximum amount of time possible for them to gather all pertinent information on participation hours and sends ad hoc queries to eligibility and work activity specialists to gather further information on any data anomaly before finalizing the quarterly report.

Two items in the report that have an impact on Florida's participation rate warrant additional comment.

Assessment: Seventeen (81%) of the 21 individuals in non-countable activities, but were in activities to move the family toward self sufficiency, were participating in some form of assessment. Since assessment and development of an individual responsibility plan serve as the gateway to all work activities, the time and effort spent are critical to a participant's success. States should be allowed to include assessment hours as countable toward the participation rate.

Individuals in the process of sanction: Eleven (17.7%) of the 62 individuals not engaged in a countable work activity or a non-countable work activity to move the family toward self-sufficiency, were in some stage of the sanction process. Florida contends that participants who are subject to a penalty in a month should include those who have been told that their benefits are going to be reduced or terminated because of their refusal to participate in work as well as those who have actually been penalized.

For example, if a person refused to participate in work on February 25th and was given notice on March 1 that her assistance would be terminated, she would receive assistance on March 1 for the month of March. Due to "Adverse Action Notice" requirements, the first opportunity the state would have to actually impose the penalty would be April 1. In March, the person would be subject to a penalty. She would have no incentive to cooperate with work requirements in March and the state would have taken all action possible to compel her

participation. The state believes this was the situation contemplated by the statute and that the family should be excluded from the calculation of the participation rate in March.

The state believes ACF should reconsider its interpretation of “subject to penalty.”

Conclusion:

This intense scrutiny of each work eligible individual is not without merit; the level of detail now known about each is enlightening to program operators and brings to light areas that will now receive additional attention. However, to do the kind of in-depth fact-finding on even this modest sample size after data collection systems have been programmed for more than fifteen years has been very labor-intensive and expensive in terms of person-hours required. To modify systems to capture the information requested on an ongoing basis would be a time-consuming and costly activity as well--at a time when state resources are strapped and there is likely to be no increase in federal funds for systems programming.