

The Claims Resolution Act of 2010 set forth new reporting requirements on States as it extended the funding for the Temporary Assistance for Needy Families (TANF) financial assistance program through September 30, 2011. Section 812. *Modifications to TANF Data Reporting* specifies new reporting requirements for engagement in additional work activities to be published on each State's website. Further guidance was provided by the U.S. Department of Health and Human Services, Administration of Children & Families (ACF) in a formal Program Instruction, Transmittal No. TANF-ACF-PI-2011-03. ACF is the federal regulatory agency overseeing the State's TANF program.

This is the first submission of the two new required reports per this law. This first reporting period is for the month of March 2011. The second reporting period is from April 1 through June 30, 2011. These new reports supplement existing, extensive federal reporting that states provide to the ACF on a quarterly basis. The ACF in return, provides states with quarterly reports, including the official TANF work participation rate, which is a federal program measure of success.

The federal law requires that states have a minimum of 50% of their work-eligible adults in countable work activities in order to stay in compliance with program requirements and avoid federal financial penalties. This is known as the TANF work participation rate. The official TANF work participation rate for Georgia for FFY 2009 was **57.1%**.

## Summary

Data gathered to meet this new reporting requirement provides Georgia an opportunity to assess the experiences of our TANF families while participating in the TANF work activities. Georgia strategically utilizes countable work activities to the greatest extent possible, given the strict parameters in which work activities are countable and allowable for the work participation calculation to meet the 50% mandatory participation rate as required by federal law. In June 2011, Georgia's unofficial work participation rate was **69.1%**. It is unofficial at this time since the federal agency is yet to confirm the rate.

It is important to note for this new report that we are being asked to discuss work activities that are 'countable' toward the work participate rate, but were not reported toward the work participation rate. Additionally, the ACF is asking us to report activities that are 'non-countable' toward the rate. Prior to the new reporting requirements, states have not been required to report on non-countable activities.

The ACF provides definition of which activities are countable and they can be found at 45 CFR, Part 261-Ensuring That Recipients Work. Any other activities are considered non-countable. Historically, states have not reported work activities that do not count toward the mandatory 50% work participation rate to the federal agency but are now expected to report this data under the new requirement.

In order for an individual to be counted toward the rate, they must verify participation hours in a countable activity for a specific number of hours each month. Parents with children 6 years old and older must participate in a countable activity for 30 hours a week for each week they are receiving a TANF benefit. Parents with children under 6 years old must participate for 20 hours.

Countable activities include:

- Unsubsidized employment;
- Subsidized employment;
- Work experience;
- On-the-Job Training (OJT);
- Satisfactory school attendance;
- Providing child care services to an individual who is participating in a community service program;
- Education directly related to employment, in the case of a recipient who has not received a high school diploma or a certificate of high school equivalency;
- Volunteer work or community service work;
- Vocational education/training (time-limited); and
- Job search/job readiness (time-limited and no more than 4-weeks can be consecutive).

The parents with a 30 hour requirement must participate in the above activities for 20 hours and then also participate for 10 more hours in the above or:

- Job skills training;
- Education directly related to employment; and
- Basic education.

**All other activities are considered 'non-countable'.**

Based on the federal guidance, and for the purpose of this report only, states must collect and report the following:

- 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. 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 count; or the number of work-eligible individuals engaged in such activity exceeds a statutory limitation .

To address the above issues, it is important to illustrate the breakdown of the families we will be discussing. In June 2011, there were 2,969 cases that were included in the work participation rate calculation.

Of the 2,969 cases, 1,968 cases met their participation requirements and were counted in the work participation rate. During FFY 2011, the average number of participating cases per month was 2,132, and the average number of cases with work eligible individuals per month was 3,085. The total number of cases included in the work participation rate was 30,854, and the total number of cases participating at the 50% mandatory rate was 21,396, with a work participation rate of 69.1%. The participation rate is calculated at the case level, the Department of Human Services, Division of Family and Children Services, Office of Federal Regulations & Data.

### **Analysis Statement**

The data provided demonstrates that the Georgia TANF Program has been consistently able to engage participants in meaningful work activities and has made a concerted effort to operate the TANF work program as intended by federal and state laws.

The most significant group of those not able to participate, who are considered work-eligible, and are included in the mandatory work participation rate calculation, have a documented medical condition. These individuals are not currently eligible for a state or federal financial disability program. These could be families who have already applied for a disability program awaiting a disability determination or an appeal decision, or those who have shorter-term illnesses/disabilities who are unable to participate for a specified period.

### **Most Common Activities Not Counted Towards Work Participation Rate**

The new requirement for States to record hours of non-countable activities that move the family toward self-sufficiency have been documented by Georgia, but have not been a part of its reporting requirements. What that means is that these non-countable activities although documented by the local County DFCS Field staff, the State does not have coding system or structured report that captures this data, so Georgia will not be able to report those hours to the ACF.

Georgia is expecting to better document and report the hours for non-countable activities in the near future. Local County DFCS Field staff work diligently to gather paper verifications for the hours clients participate in countable activities.