
Temporary Assistance for Needy Families Program Instruction

U.S. Department of Health and Human Services
Administration for Children and Families
Office of Family Assistance
Washington, DC 20447

No. TANF-ACF-PI-2007-04

Date: September 10, 2007

TO: State agencies administering the Temporary Assistance for Needy Families Program.

SUBJECT: Reporting on TANF Agency NDNH Match Results.

REFERENCES: Section 453(j)(3) of the Social Security Act.

PURPOSE: The purpose of this Program Instruction is to explain how to complete and submit the TANF Agency NDNH Match Results Report and to specify submission deadlines.

BACKGROUND:

Federal law grants the Secretary of the Department of Health and Human Services (HHS) discretion to disclose information maintained in the National Directory of New Hires (NDNH) to State agencies operating Temporary Assistance for Needy Families (TANF) programs. The NDNH contains new hire, quarterly wage, and unemployment compensation information and is maintained by the Office of Child Support Enforcement (OCSE) within its "Location and Collection" system of records, No. 09-90-0074, last published at 69 Federal Register 31392, June 3, 2004.

The Office of Child Support Enforcement (OCSE) is required to report measures of performance of the Federal Parent Locator Service (FPLS), which includes the NDNH. As part of the TANF-NDNH matching agreement, the Office of Family Assistance (OFA) must provide OCSE a quarterly report of outcomes attributable to each State Agency's use of NDNH match results.

POLICY:

Matching TANF adults receiving federally-funded assistance

The purpose of the TANF-NDNH matching program is to provide State agencies with information resulting from a comparison of its files on adults receiving federally- or MOE-funded TANF assistance against data contained in the NDNH. This information can then be used by State agencies to verify the eligibility of adult TANF recipients and their continuing compliance with statutory and regulatory requirements.

Matching other individuals served by the TANF program

In addition to matching adults receiving federally- or MOE-funded TANF assistance, States may also match adults who receive assistance under a separate State program (SSP) funded with State

MOE dollars (“qualified State expenditures” as defined in section 409(a)(7)(B)(i)) and parents who reside with a child who is a recipient of assistance (the “SSP/child-only match”). However, NDNH match results provided to State TANF agencies can only be used to determine eligibility for adults receiving federally-funded TANF assistance. Therefore, States may not use these NDNH match results to take eligibility actions (such as benefit reduction or case closure) for adults not receiving federally-funded TANF assistance. Although match results for those not receiving federally-funded assistance cannot be used for eligibility purposes, the results can be used for administrative purposes such as correcting work participation data or modifying case closure information.

ACTION:

Each State TANF agency participating in the NDNH matching process is required to report quarterly on the four items listed in the TANF Agency NDNH Match Results Report for their new hires (W-4) match, quarterly wage (QW) match, and unemployment insurance (UI) match. This report should be completed for both the TANF adult recipient match and the SSP/child-only match, although items 2 through 4 will not be completed for SSP/child-only match results since eligibility actions are not allowed. As is stated in the report, outcomes should be reported in row representing the month of the match, not the month of verification or case action. Data will be reported 45 days after the end of each quarter.

The TANF Agency NDNH Match Results report should represent what happened to the adult with verified employment—specifically if the individual’s grant was reduced or if the case they were a part of was closed. As the explanation to items 2 and 3 specifies, these items should represent the “number of unduplicated individuals reported in item 1 [adults with previously unknown employment that were verified as employed] . . . whose TANF grant was closed [or reduced].” Therefore, information reported in item 2 and 3 should represent the number of individuals with previously unknown employment that had their benefits reduced or cases closed, not the number of individuals in the case that were affected by these actions.

Overlap between NDNH and the State Directory of New Hires

States should report on all NDNH verified matches that reveal previously unknown employment, not just those that are out-of-State or federal agency matches that would not be available from the State Directory of New Hires. If an NDNH match is conducted, the individual is verified as employed, and the employment was previously unknown to the agency it should be reported on item 1 of the form regardless of if the match would also be found in the State Directory of New Hires.

Submitting amended reports

We anticipate that State reports may be incomplete when submitted 45 days after the end of the quarter as the State may not have verified all matches or have taken action on all match results. Therefore, data reported in prior quarterly submissions can be amended by reporting the revised information in subsequent quarterly submissions.

Consider the following example:

<u>Date</u>	<u>Action</u>
End of July:	June adult TANF adults are matched to the NDNH (15,000 adults)
Early August:	Match results are returned to the State (4,000 total W-4 matches)

- September: Match results verified and sent to local offices for action (400 adults verified to have employment that was previously unknown to the agency)
- October: Actions are taken based on verified employment information (350 adults have actions taken, as others had income below disregard levels or benefits were not changed for other reasons)
- November: Adult receives adjusted benefit/no benefit as a result of action (350 adults)

All match results should be reported in the month of the match, not the month of case action or when costs are avoided. In the example above, the actions taken for the 350 adults in October (resulting in cost avoidance in November) would be reported on the July row of the reporting form. The State would submit their fourth quarter report (July through September) in mid-November, although it may be incomplete at that point as they may not have yet verified all matches or have taken action on all verified matches. In mid-February (45 days after the end of the next quarter) the State would send both the first quarter report and an amended fourth quarter report containing updated information on all results from the July match. If actions were still being taken on the July match results after this amended report was submitted, the State would continue to submit amended reports each quarter until all actions resulting from the July match had been reported on a final amended report for that quarter.

FURTHER EXPLANATION OF REPORTING ITEMS:

Item 1. Unduplicated Individuals Verified as Employed: The number of unduplicated individuals with previously unknown employment that had a NDNH match and were verified as being employed while they were a TANF recipient in your State.

Unduplicated individuals means counting the same person no more than once per fiscal year. If the individual was found in more than one of the three data sources, they should be reported under the data match that triggered the verification resulting in case action. Consider the following example:

A match reveals verified income that is insufficient to trigger benefit reduction or case closure, but in a later match the individual is again identified as employed but this time has income significant enough to result in benefit reduction or case closure.

The first verified match (revealing income but not enough for a benefit change) should be reported under item 1 as previously unknown employment but would not be reported on items 2, 3, or 4 on the form. The reporting on the second match resulting in case action depends on whether the employment is different than the employment discovered in the earlier match and when in the year the match occurs. If the later match identifies the same employment as the first match (although the person may be working a different number of hours or may be paid more or less than before), this would not meet the definition of “previously unknown employment” and should not be reported. If the second match is for a different employer but within the same fiscal year as the first match, it should not be reported a second time. However, if the second match is for a different employer and in a new fiscal year, it should be reported in the new year under item 1 as previously unknown employment and also under items 2, 3, and 4 if applicable.

In some cases, a State agency may verify employment resulting from an NDNH match but take no action because earnings are below the TANF earnings disregard for the State or county. If these

matches were disregarded and not investigated further, it may not be possible to determine whether the employment was already known by the agency. These verified matches should still be reported under item 1 as previously unknown employment, although there would be nothing to report under items 2, 3, and 4.

Item 4. Unduplicated First-Month Avoided TANF Costs: Total first-month TANF costs avoided from items 2 and 3.

First-month avoided costs equal the difference between 1) the monthly grant that the TANF case would have been given in the absence of verified employment information resulting from an NDNH match, and 2) the monthly grant the TANF case actually received after the verified employment information was used to modify benefits. For example, suppose an NDNH match is verified and reveals previously unknown employment. The State recalculates the TANF benefit for the case, resulting in the case receiving a monthly TANF grant that is \$100 less than what they would have received in absence of the employment information found through the NDNH. As a result of the NDNH match, the State has avoided \$100 in costs in the month when benefits were reduced. The State would report a \$100 first-month avoided cost in item 4 of the report. The full \$100 would be reported as avoided costs regardless of if it represents State or federal funds.

EFFECTIVE DATE:

States should submit their FY 2008 first quarter report by February 14, 2008.

SUBMISSION DATES:

Data is to be reported 45 days after the end of each quarter. Data reported in prior quarterly submissions can be amended in subsequent quarterly submissions. Quarterly reports should be submitted as follows:

- Quarter 1 (Oct. – Dec.): Report by February 14
- Quarter 2 (Jan. – Mar.): Report by May 15
- Quarter 3 (Apr. – Jun.): Report by August 14
- Quarter 4 (Jul. – Sep.): Report by November 14

SUBMITTAL PROCEDURE:

Reports should be submitted electronically to:

Sean Hurley, Director
Division of Data Collection and Analysis
Office of Family Assistance
Email: sean.hurley@acf.hhs.gov

ATTACHMENTS: TANF Agency NDNH Match Results reporting form

INQUIRIES:

Inquiries should be made to Sean Hurley, Director of the Division of Data Collection and Analysis, Office of Family Assistance, ACF (email: sean.hurley@acf.hhs.gov).



Sidonie Squier
Director
Office of Family Assistance

TANF Agency NDNH Match Results – FY _____ Quarter _____ Amended _____

State: _____

Match Type	Quarter	Month	1.	2.	3.	4.
			Unduplicated Individuals Verified as Employed	Unduplicated TANF Cases Closed Due to Earnings	Unduplicated TANF Cases with Benefits Reduced	Unduplicated First Month Avoided TANF Costs
W-4 Data Match	Quarter 1	Oct				
		Nov				
		Dec				
	Quarter 2	Jan				
		Feb				
		Mar				
	Quarter 3	Apr				
		May				
		Jun				
	Quarter 4	Jul				
		Aug				
		Sep				
QW Data Match	Quarter 1	Oct				
	Quarter 2	Jan				
	Quarter 3	Apr				
	Quarter 4	Jul				
UI Data Match	Quarter 1	Oct				
	Quarter 2	Jan				
	Quarter 3	Apr				
	Quarter 4	Jul				
Unduplicated Annual Total						

“Unduplicated” means counting the same person no more than once per fiscal year. Individuals should only be counted in one of the three data sources.

Please see instructions on page two for an explanation of the four performance measures.

Instructions

General Instructions

Report all outcomes in the month of the match, not the month of verification or case action. Data is to be reported 45 days after the end of each quarter. Data reported in prior quarterly submissions can be updated in subsequent quarterly submissions.

Previously Unknown Employment

Item 1. Unduplicated Individuals Verified as Employed: The number of unduplicated individuals with previously unknown employment that had a NDNH match and were verified as being employed while they were a TANF recipient in your State.

Actions Taken

Item 2. Unduplicated TANF Cases Closed Due to Earnings: The number of unduplicated individuals reported in item 1 whose TANF grant was closed as a result of employment verified from an NDNH match.

Item 3. Unduplicated TANF Cases with Benefits Reduced: The number of unduplicated individuals reported in item 1 whose TANF grant was reduced as a result of employment verified from an NDNH match.

Avoided Costs

Item 4. Unduplicated First-Month Avoided TANF Costs: Total first-month TANF costs avoided from items 2 and 3.

Unduplicated Annual Total

The unduplicated annual total equals the sum of each column. The total for item 4 represents the annual unduplicated first-month avoided TANF costs resulting from use of the NDNH.

THE PAPERWORK REDUCTION ACT OF 1995

Public reporting burden for this collection of information is estimated to average 10 minutes per response, including the time for reviewing instructions, gathering and maintaining the data needed, and reviewing the collection of information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.