

**ENGAGEMENT IN ADDITIONAL WORK ACTIVITIES AND
EXPENDITURES FOR OTHER BENEFITS AND SERVICES,
APRIL-JUNE 2011:**

A TANF REPORT TO CONGRESS



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EXECUTIVE SUMMARY

The Claims Resolution Act of 2010 (Public Law 111-291) was signed by President Obama on December 8, 2010. The Act extended the Temporary Assistance for Needy Families (TANF) block grant through the end of fiscal year (FY) 2011. The extension included two new reporting requirements, requiring States, the District of Columbia, and Territories (henceforth referred to as “States”) to provide additional detail about: (1) work participation for families that currently do not meet the TANF program’s requirements to count toward State work participation rates; and (2) TANF spending in two broad categories known simply as “other non-assistance” and “authorized solely under prior law.” States are required to submit two reports with these data – one for the month of March 2011 and a second for the months of April, May, and June, 2011.

Section 812 of the Claims Resolution Act requires the Secretary to submit a Report to Congress on the information submitted by States. This report reflects State reports for April-June 2011. A report covering March 2011 was published in July and is available at <http://www.acf.hhs.gov/programs/ofa/data-reports/index.htm>.

Claims Resolution Act Engagement Reporting

On February 14, 2011, the Department of Health and Human Services (HHS) issued a Program Instruction (TANF-ACF-PI-2011-03) and a new reporting form (Form ACF-812, the “Report on Engagement in Additional Work Activities for Families Receiving Assistance under the TANF and SSP-MOE Programs”) to implement the work participation-related data collection requirements of the Claims Resolution Act of 2010. The Claims Resolution Act required States to report on the activities of work-eligible individuals (WEIs) on their caseloads.

All States, except the Territory of Guam, submitted the required data on the ACF-812 by September 15, 2011.

In the April-June 2011 reporting period, there were 1,236,793 average monthly WEIs throughout the United States, in approximately 1.925 million average monthly families receiving assistance through TANF or State programs counting toward TANF maintenance-of-effort (MOE) requirements. The number of individuals in each of the categories below should sum to more

than 100 percent of WEIs since a WEI could fall into more than one of the following categories. States reported the following statuses for WEIs in the April-June 2011 quarter:

- *WEIs Meeting Federal Participation Rate Standards:* Nationally, there was an average monthly total of 299,518 WEIs counting toward the participation rate (24.2 percent). Note that in most States, the percentage of WEIs counting toward the participation rate is likely to be lower than the official work participation rate. This is due to methodological differences between the calculations. For example, a family may include more than one WEI and the participation rate calculation excludes families with a WEI that can be disregarded, e.g., single parent families with a child under the age of one (for not more than 12 months over the WEI's lifetime) and families who are subject to a work-related sanction (for up to three months in a 12-month period). The WEIs in these "disregarded" families are included in the analysis here but not counted in the Federal participation rate calculation.
- *WEIs with Zero Hours of Participation:* Nationally, an average monthly total of 673,629 WEIs (54.5 percent of all WEIs) had zero hours of participation in a countable or non-countable work activity. The data from States indicate that this represents a range of situations. Among all WEIs, here were the statuses for those with zero hours of participation:
 - 8.6 percent are non-compliant and are in the sanction process (and are not disregarded);
 - 7.6 percent are in families disregarded from the participation rate because they were caring for a child under age one, were subject to a work-related sanction, or were participating in a Tribal work program;
 - 6.9 percent are individuals the State or local agency has failed to engage;
 - 6.2 percent are exempt due to illness or disability;
 - 4.4 percent are exempt due to other State policies;
 - 2.4 percent are in families in their first month of assistance with no activities yet assigned;
 - 1.9 percent have been assigned an activity that has not yet begun;
 - 1.8 percent are exempt by the State because they are single-custodial parents with a child under the age of one, but not disregarded from the work participation rate;
 - 1.0 percent are single custodial parents with a child under the age of six with no child care available;
 - 0.5 percent have relocated from one jurisdiction within the State to another;
 - 0.5 percent are exempt by the State due to a good cause;
 - 0.4 percent are exempt by the State due to illness of a child or other family member;
 - 0.4 percent are under a domestic violence waiver;
 - 0.3 percent have work activity reports that were received too late for inclusion; and
 - 9.3 percent have zero hours of participation but are in other statuses not identified as options on the ACF-812.

- *WEIs with Insufficient Hours:* Every State reported having WEIs with insufficient hours of participation. States reported an average monthly total of 193,935 (15.7 percent of all WEIs) with hours that were insufficient to satisfy the work participation requirements. The average monthly total number of hours of participation in countable work activities for this category was 10,514,565. Over 43 percent of the hours for this category were in unsubsidized employment, reflecting the extent of part-time employment among WEIs.
- *WEIs with Hours in Non-Countable Activities:* Thirty-three States reported an average monthly total of 62,460 WEIs (5.1 percent of WEIs) with hours of participation in non-countable activities that move families toward self-sufficiency, with an average monthly total of 1,898,110 hours of participation in non-countable activities reported by States. Four activities accounted for over 60 percent of the hours spent in these activities:
 - 23.9 percent for activities related to adult basic education;
 - 18.6 percent of these hours were in treatment activities; and
 - 18.0 percent for family life skills activities.
- *WEIs with Hours that Do Not Meet Verification Standards:* Twenty-five States reported an average monthly total of 32,627 WEIs (2.6 percent) with unverified hours, totaling 2,705,932 unverified hours on an average monthly basis. The data submitted in response to the Claims Resolution Act requirements may understate the number of States and WEIs with unverified hours of participation because States and/or their vendors typically do not collect information about non-verified hours of participation and there is little incentive to invest resources in doing so.
- *WEIs with Uncountable Hours Due to Statutory Time Limits on Participation:* Thirty-five States reported having an average monthly total of 24,620 WEIs (2.0 percent of all WEIs) participating in time-limited activities beyond a statutory limit. Nationally, the average monthly total number of hours beyond the statutory limit reported by States was 1,330,545 hours, with most of these hours in job search/job readiness assistance (814,329 hours, or 61.2 percent). The remaining hours beyond the limit are in vocational educational training (516,216 hours, or 38.8 percent).
- *WEIs with Unreported Countable Hours:* Eighteen States reported an average monthly total of 17,234 WEIs (1.4 percent of all WEIs) with countable hours of participation that the State chose not to report to the Federal government as part of its standard work participation rate reporting, totaling 429,734 hours of unreported participation on an average monthly basis. The total number of unreported hours of participation in countable work activities was greatest in job search/job readiness assistance and in unsubsidized employment. Note that a State may choose not to report hours of participation for purposes of the work participation rate if the individual does not meet the standard for counting toward the work participation rate calculation.

Claims Resolution Act Financial Data Reporting

The Claims Resolution Act required additional State reporting concerning two expenditure categories for which there is only limited reported information – “other non-assistance” and “authorized solely under prior law,” which may be either “assistance” or “non-assistance.”

“Other non-assistance” involves expenditures that meet a TANF purpose, but do not fall within the definition of “assistance” or any other listed category. However, past research on TANF financial data indicates that States sometimes report certain expenditures as “other” non-assistance even though they could report them in other categories on the ACF-196.

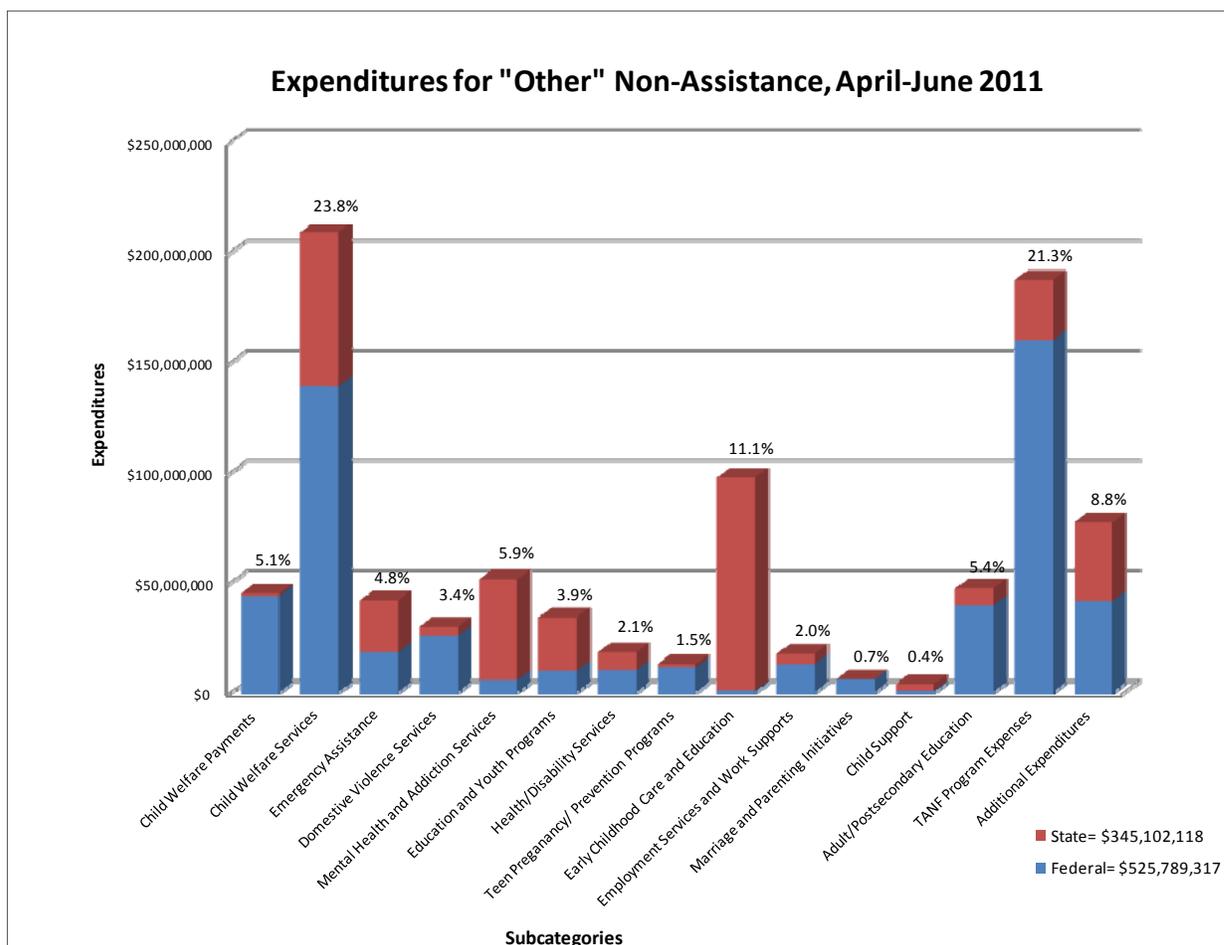
Expenditures “authorized solely under prior law” do not meet a TANF purpose, but are allowed pursuant to Section 404(a)(2) of the Social Security Act, which permits States to use TANF funds in any manner that was allowed under the prior Title IV-A (the Aid to Families with Dependent Children Program) or IV-F (Job Opportunities and Basic Skills Training Program) on September 30, 1995, or at State option, August 21, 1996.

On February 14, 2011, HHS issued a Program Instruction (TANF-ACF-PI-2011-04) and a new reporting form -- the Detailed Expenditure Form: ACF-196 Supplement (ACF-196(SUP)) -- to implement the spending-related reporting requirements of the Claims Resolution Act.

Every State submitted the ACF-196(SUP) form by September 15, 2011.

Nationally, “other” non-assistance expenditures totaled \$878,983,444 for April-June 2011, while States spent a total of \$327,701,820 for assistance and non-assistance “authorized solely under prior law.” For the entire fiscal year, spending would be \$3.5 billion and \$1.3 billion for “other” non-assistance, and assistance and non-assistance “authorized solely under prior law,” respectively, if spending across four quarters were four times the spending in April-June. Average monthly expenditures equal \$292,994,481 and \$109,233,940 for the “other” non-assistance, and assistance and non-assistance “authorized solely under prior law,” respectively. Note that while States may expend either Federal TANF or State MOE on “other” non-assistance, only Federal funding may be expended on programs “authorized solely under prior law.”

- “Other” Non-Assistance: Forty-five States reported expenditures in “other” non-assistance.

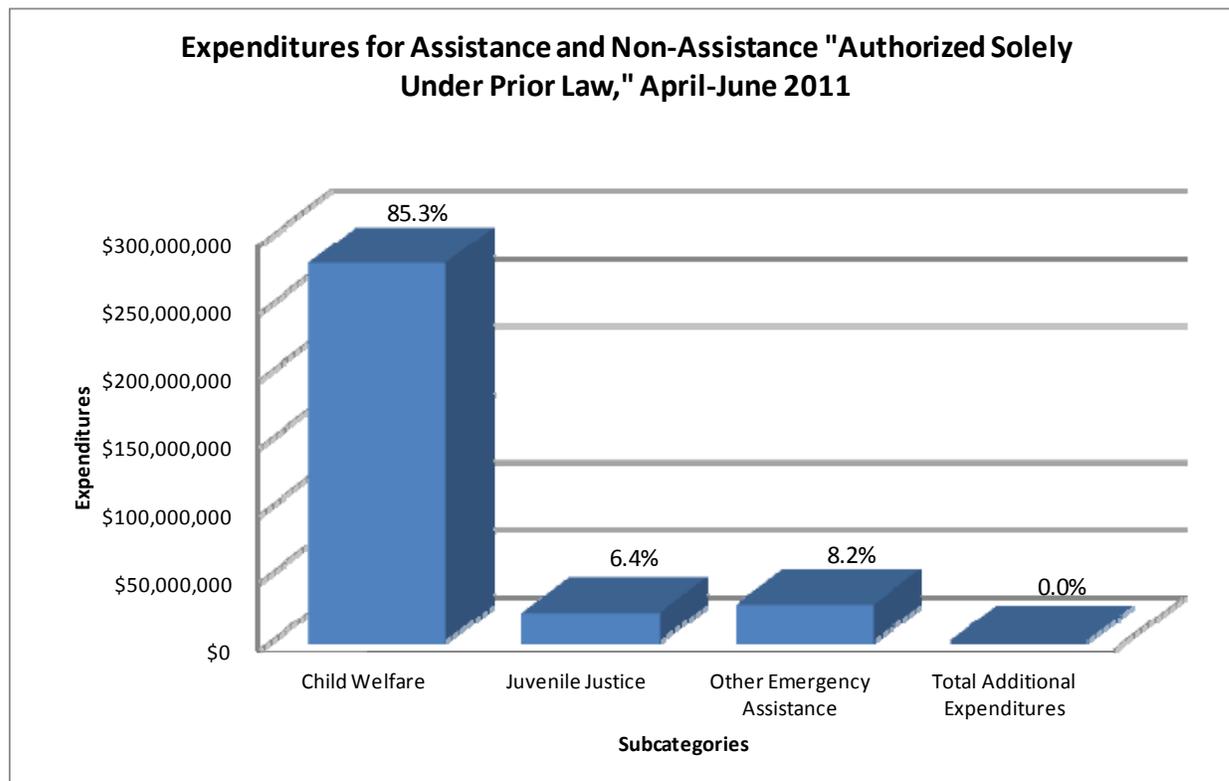


- *Child Welfare Payments*: Eight States reported expenditures in Child Welfare Payments. Total spending equaled \$44,873,004, or 5.1 percent of “other” non-assistance.
- *Child Welfare Services*: Twenty-one States reported expenditures in Child Welfare Services. Total spending equaled \$209,108,931, or 23.8 percent of “other” non-assistance.
- *Emergency Assistance*: Twenty States reported expenditures for Emergency Assistance. Total spending equaled \$41,832,814, or 4.8 percent of “other” non-assistance.
- *Domestic Violence Services*: Fifteen States reported expenditures for Domestic Violence Services. Total spending equaled \$29,796,577, or 3.4 percent of “other” non-assistance.
- *Mental Health and Addiction Services*: Fourteen States reported expenditures for Mental Health and Addiction Services. Total spending equaled \$51,410,513, or 5.9 percent of “other” non-assistance.
- *Education and Youth Programs*: Eleven States reported expenditures for Education and Youth Programs. Total spending equaled \$34,004,208, or 3.9 percent of “other” non-assistance.

- *Health/Disability Services*: Eleven States reported expenditures for Health/Disability Services. Total spending equaled \$18,232,901, or 2.1 percent of “other” non-assistance.
- *Teen Pregnancy/Prevention Programs*: Nine States reported expenditures for Teen Pregnancy/Prevention Programs. Total spending equaled \$12,962,053, or 1.5 percent of “other” non-assistance.
- *Early Childhood Care and Education*: Fourteen States reported expenditures for Early Childhood Care and Education. Total spending equaled \$97,695,198, or 11.1 percent of “other” non-assistance.
- *Employment Services and Work Supports*: Twelve States reported expenditures for Employment Services and Work Supports. Total spending equaled \$17,549,917, or 2.0 percent of “other” non-assistance.
- *Marriage and Parenting Initiatives*: Ten States reported expenditures for Marriage and Parenting Initiatives. Total spending equaled \$5,847,692, or 0.7 percent of “other” non-assistance.
- *Child Support*: Six States reported expenditures for Child Support. Total spending equaled \$3,857,299 or 0.4 percent of “other” non-assistance.
- *Adult/Postsecondary Education*: Five States reported expenditures for Adult/Postsecondary Education. Total spending equaled \$47,187,788, or 5.4 percent of “other” non-assistance.
- *TANF Program Expenses*: Twenty-two States reported expenditures for TANF Program Expenses, which we define as program management and related expenditures. This may include expenditures such as salaries and benefits for TANF workers, case management, and other operating costs. Total spending equaled \$187,340,185, or 21.3 percent of “other” non-assistance.
- *Additional Expenditures*: Twenty-four States reported expenditures for additional expenditures. This category totaled \$77,284,364, representing 8.8 percent of “other” non-assistance.

As noted, in a number of cases, expenditures reported as “other” non-assistance could appropriately be reported under other existing reporting categories on the ACF-196 TANF reporting form.

- *Assistance and Non-Assistance "Authorized Solely Under Prior Law"*: Twenty-five States reported expenditures in assistance and non-assistance "authorized solely under prior law."



- *Child Welfare*: Twenty States reported expenditures for Child Welfare activities "authorized solely under prior law." Total spending equaled \$279,628,827, or 85.3 percent of assistance or non-assistance "authorized solely under prior law."
- *Juvenile Justice*: Three States reported expenditures for Juvenile Justice activities "authorized solely under prior law." Total spending equaled \$21,078,860, or 6.4 percent of assistance or non-assistance "authorized solely under prior law."
- *Other Emergency Assistance*: Eight States reported expenditures for Other Emergency Assistance "authorized solely under prior law." Total spending equaled \$26,994,133, or 8.2 percent of assistance or non-assistance "authorized solely under prior law."
- *Additional Expenditures*: Zero States reported expenditures in this subcategory.

Recommendations for Engagement and Financial Data Reporting

The Claims Resolution Act directed HHS to include in this report such "recommendations for administrative or legislative changes as the Secretary determines would be necessary to require States to report Claims Resolution Act data on a recurring basis."

With respect to work participation data collection, HHS lacks the administrative authority to require the Claims Resolution Act data on an ongoing basis without statutory change, in light of the restrictions posed by Section 417 of the Social Security Act. Accordingly, any change to require such data on a permanent basis would need to be authorized by Congress.

When Congress considers legislation to reauthorize TANF, it may wish to consider issues related to engagement data reporting in conjunction with consideration of which activities should count toward the participation requirements and for what periods of time, whether individuals participating for some hours should partially count toward participation rates, and what information should be collected about individuals not counting toward participation rates and under what circumstances. Moreover, consideration should be given to a broader set of questions about which outcomes should be tracked for States and families, and the data collection needed to have a clearer picture of progress toward sustained employment and self-sufficiency, and of child and family well-being. If Congress does determine to add additional engagement-related reporting, HHS recommends that reporting be integrated with existing participation requirements so that States are reporting in a single system, with one set of time frames for data submission. Finally, any data reporting requirements should include a reasonable time period for States to collect and report data

With respect to financial data, HHS originally established the current categories for financial reporting in FY 1999, and they have not been modified since that time. It would be possible to make some revisions to the categories through modification of existing reporting categories, either administratively or through legislative directive. Based on the analysis of the March and April-June reporting data, HHS intends to develop new reporting categories that break out the current categories of “other” non-assistance and assistance and non-assistance “authorized solely under prior law.” HHS also plans to revise the instructions for completing the ACF-196 reporting form, as well as definitions for each expenditure.

OVERVIEW

The Claims Resolution Act of 2010 (Public Law 111-291) was signed by President Obama on December 8, 2010. The Act extended the Temporary Assistance for Needy Families (TANF) block grant through the end of fiscal year (FY) 2011. The extension included two new reporting requirements, requiring States, the District of Columbia, and Territories (henceforth referred to as “States”) to provide additional detail about: (1) work participation for families that currently do not meet the TANF program’s requirements to count toward State work participation rates; and (2) TANF spending in two broad categories known simply as “other non-assistance” and “authorized solely under prior law.”

States are required to submit two reports with these data – one for the month of March 2011 and a second for the months of April, May, and June 2011. The March report was due no later than May 31, 2011, and the April - June report is due no later than August 31, 2011. A State that fails to submit either report by the applicable deadline is subject to a penalty of up to 4 percent of its block grant, although the law provides that the penalty must be rescinded if the report is filed by an extension deadline of June 15, 2011, and September 15, 2011, respectively.

Section 812 of the Claims Resolution Act requires the Secretary to submit a report to Congress on the information submitted by States. This report reflects State reports for April-June 2011. A report covering March 2011 was published in July of 2011 and is available at <http://www.acf.hhs.gov/programs/ofa/data-reports/index.htm>.

WORK PARTICIPATION DATA

The TANF statute specifies the work participation rate requirements for States. States must meet both an overall and a two-parent work participation rate or face a financial penalty. The overall work participation rate for a State requires that at least 50 percent of TANF families with a work-eligible individual (WEI) engage in one or more of 12 specified work activities (see Table 1) for a minimum average of 30 hours per week (20 hours for a single parent with a child under six) in a month. The two-parent work participation rate requires States to have at least 90 percent of two-parent families with two WEIs in work activities for at least an average of 35 hours per week (55 hours for a family receiving federally subsidized child care) in a month. The hours of

participation must meet verification standards established by the States in their Work Verification Plans. The law also includes a caseload reduction credit, which reduces a State's required participation rate by one percentage point for each percentage point that the State's assistance caseload for the prior year (the comparison year) fell below the caseload in FY 2005 (the base year). The Deficit Reduction Act of 2005 (DRA) required the work participation rates to include families in separate State programs funded with maintenance-of-effort funds (SSP-MOE) (i.e., programs funded with State dollars counting toward the State's cost sharing requirements). This change took effect with the FY 2007 work participation rates.

The law specifies the activities that may count for work participation purposes and imposes certain restrictions on when they may count. Specifically, under the law, for a family to count in the State's overall work participation rate for a month, a WEI in the family must participate for an average of 30 hours per week, of which at least an average of 20 hours per week must be in one or more of the nine "core" activities. The three other "non-core" activities may count for any remaining hours beyond the "core hours" requirement. Please refer to Table 1 for a list of the countable work activities. Similarly for the two-parent rate, 30 of the 35 average weekly hours (or 50 of 55 hours for a family receiving federally subsidized child care) must come from the same nine work activities.

A teen parent (under age 20) who is a WEI may count toward the work participation rate without regard to the hours and activities requirements if he or she maintains satisfactory attendance in secondary school (or the equivalent) or participates in education directly related to employment for an average of at least 20 hours per week in the month.

Current law restricts a State's ability to count toward the participation rate hours of participation in certain activities. It limits counting participation in job search/job readiness assistance to no more than six weeks in a 12-month period (or 12 weeks in a 12-month period if a State meets the definition of a "needy State" for the TANF Contingency Fund) and no more than four consecutive weeks¹. Similarly, vocational educational training is limited to a lifetime of 12

¹ The final rule implementing the Deficit Reduction Act of 2005, published February 5, 2008, defined one week of job search and job readiness assistance as equal to 20 hours for a work-eligible individual who is a single custodial parent with a child under six years of age and equal to 30 hours for all other work-eligible individuals (See 45 CFR 261.34). Thus, when a jurisdiction is subject to the statutory limit of six weeks of job search and job readiness assistance, the six weeks equates to 120 hours in a 12-month period for the first group and 180 hours in a 12-month

months for any individual for participation rate purposes. In addition, not more than 30 percent of those counting toward each participation rate for a month may do so because they are participating in vocational educational training or the teen parent educational activities (i.e., satisfactory secondary school attendance and at least 20 hours per week in education directly related to employment). This limitation is not reflected in this data collection, as that calculation is performed by the Administration for Children and Families (ACF) in the preparation of final work participation rate data and is based on families with a WEI, rather than individual WEIs.

As described below, these restrictions may affect how some States report hours of work activity participation by some WEIs.

Table 1: Current Countable Work Activities	
“Core” Activities (at least 20 hours/week from these)	“Non-Core” Activities (only countable for hours in excess of 20)
Unsubsidized employment	Job skills training directly related to employment
Subsidized private sector employment	Education directly related to employment
Subsidized public sector employment	Satisfactory attendance at secondary school or in a GED program
Work experience	
On-the-job training	
Job search /job readiness assistance	
Community service programs	
Vocational educational training	
Providing child care to a participant in a community service program	

In accordance with the DRA, the Department of Health and Human Services (HHS) defined each of the countable work activities and established verification requirements that a State must meet in order to count an hour of participation in an interim rule published on June 29, 2006, and revised on February 5, 2008, with publication of the final rule. The work activities are defined at 45 CFR 261.2 and included as Appendix III of this report.

Work Participation Reporting Requirements

Since the beginning of TANF, States have been required to collect data on work participation activities on a monthly basis for both TANF (ACF-199 form) and SSP-MOE (ACF-209 form)

period hours for all others. For those months in which the jurisdiction is able to count 12 weeks of this activity, these limits are 240 hours and 360 hours in a 12-month period, respectively.

cases; these data are reported to HHS on a quarterly basis. These data include disaggregated case record information on the families receiving assistance, including hours of participation in the 12 statutory TANF work activities. For each of these countable work activities, States report the average hours of participation per week for the report month. A State may comply with these requirements by collecting and submitting case record information for its entire caseload or by collecting and submitting the case record information obtained through the use of scientifically acceptable sampling methods for a portion of the caseload.

Participation Data Trends in Past Years

States have submitted data on work participation since FY 1997. These data are used to calculate a State's work participation rate. Since FY 2002, the work participation data has been reported in a manner that allows for the presentation of the share of families required to participate that have insufficient hours to count as participants and the share with no reported hours of participation. Until the special data collection provisions of the Claims Resolution Act were established, States were not required to submit data that explained why a WEI was not engaged in activities, nor whether an individual not counting toward participation rates was involved in other self-sufficiency-related activities. HHS lacked authority to require such reporting because, pursuant to Section 417 of the Social Security Act, HHS cannot require data reporting beyond the reporting required by statute.

Federal participation rates are calculated based on families subject to and meeting participation requirements. The Claims Resolution Act, on the other hand, requires reporting on an individual rather than a family basis, i.e., it requires reporting for all WEIs. Because there may be one or more WEIs in a family, the number of WEIs is greater than the number of families with a WEI. For example, in FY 2009, there were 1,166,322 WEIs receiving assistance, versus 1,035,213 families including a WEI.² Furthermore, the TANF statute allows States to disregard from the work participation rate families with a WEI: that include a single custodial parent caring for a child under age one (for not more than 12 months over the WEI's lifetime); that are subject to a

² This figure is based on Table 3A, Status of TANF and SSP-MOE Families as Relates to All Families Work Participation Rates, (available at <http://www.acf.hhs.gov/programs/ofa/particip/indexparticip.htm>) which subtracts "number of families with no work-eligible individual" and "number of families listed in error" from the total number of TANF and SSP-MOE families.

penalty for refusing to work in that month, unless that family has been penalized for refusal to participate in work activities for more than three of the last 12 months; and that are participating in a Tribal work program. For the Claims Resolution Act, however, States were instructed to include these individuals when reporting total WEIs, and were able to cite the disregards as a reason for zero hours of participation (see Tables 7, 8, and 9 below).³ These distinctions matter because data presented by families “required to participate” will look somewhat different than data presented by WEI. For instance, in FY 2009, 45.2 percent of families with a WEI that were “required to participate” had one or more reported hours of participation (see columns two and three in Table 2 below), while 41.8 percent of WEIs had one or more reported hours of participation (see column six in Table 2).

Regardless of the unit of analysis, the trend is the same. With the exception of one year (FY 1999), the TANF participation rate has ranged between 29.5 percent and 35.3 percent in every year since TANF began. The share of families “required to participate” (i.e., with a WEI and not disregarded) with no reported hours of participation has ranged between 50.9 percent (FY 2001) and 56.7 percent (FY 2007) in every year between FY 2000 and FY 2009; the share of WEIs with no reported hours of participation has ranged between 55.3 percent (FY 2006) and 62.1 percent (FY 2007) in each year between FYs 2000 and 2009.⁴

³ Some disregarded families may also be included within other categories of WEIs, e.g., those participating in non-countable activities and those whose hours of participation could not be verified.

⁴ Prior to FY 2007, work participation rates were based on adults receiving assistance in the TANF program. The DRA extended participation requirements to certain non-recipient parents and included families receiving assistance in a separate State program funded with MOE dollars.

Fiscal Year	Families with a Work-Eligible Individual (WEI)				Work-Eligible Individuals (WEIs)		
	1: Required to Participate	2: Participating & Counting Toward Rates	3: Insufficient Hours	4: Zero Hours of reported participation	5: Total WEIs	6: Any Hours of Reported Participation	7: Zero Hours of Reported Participation
1997	2,077,815	30.7%	NA	NA	NA	NA	NA
1998	2,104,265	35.3%	NA	NA	NA	NA	NA
1999	1,612,477	38.3%	NA	NA	NA	NA	NA
2000	1,260,392	33.4%	14.6%	51.4%	1,588,651	39.7%	60.3%
2001	1,112,577	34.4%	14.7%	50.9%	1,403,089	43.2%	56.8%
2002	1,042,990	33.5%	13.1%	53.4%	1,311,607	41.7%	58.3%
2003	1,014,123	31.6%	13.2%	55.2%	1,242,473	41.2%	58.8%
2004	952,523	32.3%	13.6%	54.1%	1,164,873	42.5%	57.5%
2005	885,730	33.5%	13.6%	52.9%	1,095,346	43.4%	56.6%
2006	817,937	33.1%	14.3%	52.6%	992,734	44.7%	55.3%
2007	882,613	29.9%	13.4%	56.7%	1,124,351	37.9%	62.1%
2008	827,322	29.5%	14.4%	56.1%	1,049,558	39.5%	60.5%
2009	931,738	29.6%	15.6%	54.8%	1,166,322	41.8%	58.2%

Source: various tables available at <http://www.acf.hhs.gov/programs/ofa/particip/indexparticip.htm>

Prior Research on Engagement and Non-Participation

While the percentage of TANF cases with zero hours of participation has always exceeded 50 percent of those “required to participate” (or, more precisely, those included in the denominator of the work participation rate calculation), there also has been considerable anecdotal evidence that many families are engaged in a range of activities that do not meet TANF’s work participation requirements. To learn more about these strategies, the Office of the Assistant Secretary for Planning and Evaluation at the Department of Health and Human Services contracted with Mathematica Policy Research, Inc., (MPR) in FY 2003 to conduct the *Study of Work Participation and Full Engagement Strategies*, an examination of seven State and local programs that attempt to engage all or nearly all TANF recipients in work and work-related activities.⁵ While the sites selected were not representative of TANF sites in general, the range of activities found in these sites shows the importance that at least some States were placing on non-countable activities designed to promote self-sufficiency.

⁵ Jacqueline Kauff, Michelle K. Derr, and LaDonna Pavetti, *A Study of Work Participation and Full Engagement Strategies: Final Report* (Washington, DC: Mathematica Policy Research, Inc., September 2004), available at <http://aspe.hhs.gov/hsp/full-engagement04/report.pdf>

Table 3 shows the types of “engagement” activities that were identified in the MPR study, including those that do not count toward TANF’s work participation requirements.

Table 3: TANF Work and Engagement Activities						
Employment-Related	Education and Training	Treatment	Life Skills	Accessing Work Supports	Child-Related Activities	Miscellaneous
Unsubsidized employment (including self-employment)	High school or GED	Physical or mental health treatment	Family life skills	Finding and arranging child care	Attending after-school appointments	Commuting to, from, or between activities
Public and private sector subsidized employment	Adult basic education	Substance abuse treatment	Teen parent services	Obtaining a driver’s license	Helping with homework	Complying with various requirements (e.g., child support enforcement)
On-the-job training	English as a Second Language	Domestic violence	Parenting programs	Applying for transportation	Attending to physical or mental health conditions (e.g., immunizations)	Attending court (for personal reasons or jury duty)
Job search/ job readiness assistance	Vocational education	Physical or developmental disabilities	Mentoring	Obtaining work-related equipment or clothing	Volunteering for child-related activities (e.g., sports, classroom, etc.)	Applying for SSI, housing assistance, or other income support programs
Work experience	Vocational rehabilitation	Prenatal programs	Personal development activities (e.g., journal writing)			
Community service	College	Services for learning disabilities	Organizational skills workshops		Home schooling	Caring for a disabled family member
	Homework		Budgeting skills workshops			In conciliation
						In sanction status
						In assessment

Sources: Adapted from Jacqueline Kauff, Michelle K. Derr, and LaDonna Pavetti, *A Study of Work Participation and Full Engagement Strategies: Final Report* (Washington, DC: Mathematica Policy Research, Inc., September 2004), available at <http://aspe.hhs.gov/hsp/full-engagement04/report.pdf>; includes additional activities suggested by States and other interested parties in comments provided on the interim final rule for the Deficit Reduction Act of 2005.

Beginning with FY 2000, HHS incorporated an “Other Work Activities” data element to its data collection system to allow States to report, on a voluntary basis, hours of participation in activities that cannot count toward the TANF work participation rates. While some States have been providing data in this category since FY 2000, on June 2, 2010, HHS issued an Information Memorandum (IM), TANF-ACF-IM-2010-01, to further encourage all States to make reporting all non-countable activities in the “Other Work Activities” data field a regular practice (note: aside from reporting requirements in the Claims Resolution Act, HHS lacks the authority to *require* States to report hours of participation that do not count toward meeting participation rates).

Claims Resolution Act Engagement Reporting

On February 14, 2011, HHS issued a Program Instruction (TANF-ACF-PI-2011-03) and a new reporting form (Form ACF-812, the “Report on Engagement in Additional Work Activities for Families Receiving Assistance under the TANF and SSP-MOE Programs”) to implement the work participation-related data collection requirements of the Claims Resolution Act of 2010 (see Appendix I).

The Claims Resolution Act required States to report on the activities of WEIs. The regulatory definition of a “work-eligible individual” is found at 45 CFR 261.2(n); it refers to “an adult (or minor child head-of-household) receiving assistance under TANF or a separate State program or a non-recipient parent living with a child receiving such assistance unless the parent is: (i) a minor parent and not the head of household; (ii) a non-citizen who is ineligible to receive assistance due to his or her immigration status; or (iii) at State option on a case-by-case basis, a recipient of Supplemental Security Income (SSI) benefits or Aid to the Aged, Blind, or Disabled in the Territories. The term also excludes: (i) a parent providing care for a disabled family member in the home, provided that there is medical documentation to support the need for the parent to remain in the home to care for this disabled family member; (ii) at State option on a case-by-case basis, a parent who is the recipient of Social Security Disability Insurance (SSDI) benefits; and (iii) an individual in a family receiving MOE-funded assistance under an approved Tribal TANF plan, unless the State includes the Tribal family in calculating work participation rates under §261.25.”

For the ACF-812, with respect to each WEI in a family receiving TANF or SSP-MOE assistance during the reporting period, each State must collect and report for each WEI the specific activities that (1) do not qualify as countable work activities, but are otherwise reasonably calculated to help the family move to self-sufficiency; (2) that are countable work activities, but for the fact that the State chose not to report the hours of participation; or (3) that could be countable work activities, but for the fact that the WEI: (a) has not engaged in such activities for a sufficient number of hours to count toward participation rates; (b) has reached a maximum time limit allowed for having participated in the activity count; or (c) has hours of participation that do not meet the standards needed to comply with work verification requirements. If a WEI has

no hours of participation in any activity, the State is to select from a variety of possible reasons for non-participation.

As specified by statute, States were permitted to use samples. For a State that currently submits the TANF Data Report (and, if applicable, the SSP-MOE Data Report) based on a sample, the State must generally use the same selected cases for the report month in this report. For a State that submits the TANF Data Report (and, if applicable, the SSP-MOE Data Report) for all cases receiving assistance for a report month, the State has the option to submit this report for the entire caseload or submit this report based on a sample. The applicable sampling procedures are described in the aforementioned Program Instruction (see Appendix I for ACF-812 instructions).

All States except the Territory of Guam submitted the required data by September 15, 2011. States took various approaches to collecting the data for the ACF-812 report. Some States made extensive changes to their data collection systems to collect the requested information by either making changes to their automated data systems or collecting the data manually, e.g., by sending a survey to county welfare departments to complete data elements for WEIs in the sample, examining individual case notes, and even contacting each sampled TANF client via telephone to conduct an in-depth interview. For example, after recognizing that its automated system could not be programmed to capture the information required for this report, Florida implemented intensive data collection strategies; the State explains in its engagement report:

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.

As described below, however, other States explained that they did not have the time or resources for such elaborate efforts, so questions remain about the completeness of their data.

In addition to submitting data to HHS on the ACF-812, the Claims Resolution Act also required each State to publish a summary report of engagement in additional activities on a website maintained by the State concurrently with the submission of data to HHS. States were not

required to submit these reports to HHS. Appendix II of this report provides a list of the website addresses where these reports may be accessed.

Assessment of Data Quality

The Claims Resolution Act specified that this report to Congress should identify “any States with missing or incomplete reports.” After all data were submitted, ACF undertook an extensive review of the engagement data to assess its completeness and accuracy. This review uncovered a number of problems or issues that required additional follow-up and significantly improved the accuracy of the reported data.

Number of WEIs

One of the first data elements we checked was the number of WEIs. We compared the average monthly figure for the April-June quarter with the same data element from the March report and the same figure from the TANF Data Reporting System (TDRS) – the official source for the work participation rate data. We found significant deviations in a number of States between these sources, but worked with States to identify potential sources of error.

One source of error was related to the amount of time States had to collect the data. In particular, States were subject to stricter timeframes for submitting their data for the “engagement” report than they were for their regular TANF work participation data, particularly with respect to revisions and corrections. As one State noted:

[f]or the normal quarterly TANF Data Report to ACF, states have the opportunity to resubmit data if new information is received about the TANF case or data entry errors are found. For the Report on Engagement in Additional Work Activities, states are not allowed this option. For this reason, these data may be inconsistent with what will be reported for the comparable period in the TANF Data Report.

In some cases, these differences were significant and we permitted States to update and resubmit their data in the interests of obtaining a more accurate picture.

Another source of error was the misclassification of individuals as WEIs. For example, in one State, we noticed that approximately 30 percent of all WEIs had zero hours due to disability or illness. This percentage seemed implausible, suggesting either an error or a very broad definition of “disability” or “illness.” Upon closer review, it turned out that many of the individuals reported as WEIs were actually non-recipient parents receiving SSI. Although States have the

option to count members of this population as WEIs, most choose not to. After making this correction, the State's WEI population fell by about 25 percent.

In some cases, differences between data reports resulted from missing data (e.g., missing counties or recipient groups, such as WEIs in separate State programs) or differences in the sample weights used by ACF and the States.

Categories of Participation

The Claims Resolution Act required States to provide additional information about the engagement of TANF work-eligible individuals. Upon reviewing the data submitted by States we noticed areas of possible incompleteness in the data submissions of a number of States, especially information regarding WEIs with hours in non-countable activities, WEIs with hours that do not meet verification standards, WEIs with uncountable hours due to statutory time limits on participation, and WEIs with unreported countable hours. A number of States reported zero or a very small share of cases in these categories, results that appeared to be inconsistent with the data reported by most other States. We asked selected States to explain the efforts they undertook to collect this data and why no or very few individuals were included in any of the alternative categories. These responses suggested a range of reasons.

A number of States reported problems with their "systems."

- "...this report captures strictly the number of additional individuals in activities that would be countable and does not include adults participating in non-countable activities leading to barrier removal and self-sufficiency. Activities that do not meet the definition of a core or non-core activity are not captured on [the State's] computer system and these findings do not include any activities such as family life skills or parenting classes. Extensive programming and policy changes would be required for the state to be able to report on these uncountable self-sufficiency activities . . ."
- "Because of limited staff resources, [the State's] primary focus for the ACF 812 report was manually reviewing the cases of individuals with zero countable work activity hours to determine why they had zero hours. In regards to gathering uncountable hours, [the State's] legacy system does not allow case managers to enter hours for non-scheduled work activities. As stated above, [the State] lacked the time and resources to update our system to gather this data."
- "[The State's] automated systems have limited capabilities to identify and capture data under this category as these are not required by the regular TANF Data Report. There

was insufficient time and the costs prohibitive to allow for making system changes that would be required to completely capture this information in an automated manner.”

- “These are significant changes for systems and reporting staff, but also for line staff. We were not able to make the necessary system changes or to train line staff for these new expectations because of the short time period in which the data was requested, as well as the normal operations and changes that are taking place within our local agency. For this reason, some of the data was not available.”

Some State officials responded by claiming that there were no or very few individuals in other categories. This may be because the State does not “allow” such participation.

- “[w]e only utilize the allowable activities specified in section 407(d) of the Social Security Act and we do not allow the use or promote the use of other activities that are not directly related to our work-first philosophy. If individuals are doing other activities on their own outside of the [State’s] program we do not support, track, record or capture that information.

While States may not count individuals in other activities, there are many who participate in self-initiated activities. Thus, the failure to “track, record or capture that information” does not mean that it did not occur. It is impossible to know the extent of such participation unless data collection instruments are modified to collect it.

Even in States that made extensive efforts to comply with the new requirements, the findings may be somewhat incomplete. For example, New York cautioned that the timing precluded the use of a number of verification tools:

It should be noted that the deadline for producing the report precluded the use of a number of tools employed in the regular sample reporting that are designed to more fully enumerate the activities WEIs are engaged in, determine which individuals are WEIs for federal purposes, and verify the characteristics and circumstances of the cases and persons sampled. These tools include use of the National Directory of New Hires data to identify persons engaged in employment, and the use of SSI data to eliminate persons accepted for that program from consideration as a WEI. Both of these activities result in substantial increases in the work participation rate by identifying more countable activity and further decreasing the participation denominator. They also identify persons engaging in activities but not countable for federal rate calculation purposes. The limited time for producing the report also precluded more thorough data gathering from social service offices, work activity providers, employers and recipients to uncover activity not normally available to our data systems or employment workers.

Reasons for Zero Hours

We also noted that some States reported few reasons for individuals having zero hours of participation or grouped them into the “Other” category. Again, States reported various difficulties in collecting this information, particularly related to systems modifications.

- “Unfortunately, [the State’s] data collection and reporting system, known as the [State] Benefits Management System is currently not programmed to collect and report on reasons for work eligible individuals having ‘0’ hours. In the case of the 812, [the State] was limited to what was currently programmed that derives answers for our TANF federal report to answer the question of ‘why 0 hours.’”

General Caveats

There are several general caveats to consider in the analysis of the work and engagement data presented in this report. First, most States provided data using a sample, typically derived from the same sample used for current TANF data reporting requirements (or following similar procedures). Since the sample sizes for the April-June report are based on sample size needs for an annual data collection, many States cautioned that the results may not be a statistically valid representation of the caseload. For example, as New York observed:

Because this is a three-month sample, and the sample size is designed to produce stable estimates of work rates over the course of an entire FFY, there may be some error in the estimates produced, but to a lesser degree than in the single month sample used for the report covering March 2011. . . . For instance, some of the figures listed above are based on a single weighted observation, and activities that WEIs may be engaging in or circumstances they are experiencing may not appear here simply because no such individuals were sampled in the target quarter.

Second, the data reported here are not directly comparable to most of the data published when the official work participation rate data are released. The official TANF work participation rates are based on TANF and SSP-MOE families with a WEI and States are permitted, by statute, to “disregard” certain families from the participation rate calculation. Many of the detailed tabulations released as part of the work participation rate series also are based on this subgroup of families. In contrast, this special data collection is based on all WEIs. Thus, a family with two WEIs might count as one unit in the analysis of the official work participation data (if not disregarded), but as two units in this analysis. And, a WEI that is part of a family disregarded from the participation requirements because he or she has a child under the age of one or is

subject to a sanction for no more than three months in the preceding 12-month period, is included in this analysis.

Total Number of Work Eligible Individuals

Table 4 shows the average monthly total number of WEIs reported by States for the months of April to June 2011. Throughout the United States, the average monthly total number of WEIs⁶ was 1,236,796, ranging from 101 in Wyoming to 436,164 in California.

Table 4 also provides a State-by-State breakdown of the number of WEIs in each of the following seven categories, while Table 5 shows the percent distribution of WEIs in each respective category: (1) WEIs meeting Federal participation rate standards (24.2 percent), (2) WEIs with zero reported hours of participation (54.5 percent), (3) WEIs with insufficient hours (15.7 percent), (4) WEIs with hours in non-countable activities (5.1 percent), (5) WEIs with hours that do not meet verification standards (2.6 percent), (6) WEIs with hours beyond the statutory limit (2.0 percent), and (7) WEIs with unreported countable hours (1.4 percent). An individual can appear in more than one category, so the sum (and percent) of individuals in the seven categories may exceed the total number of WEIs (100 percent). Chart 1 illustrates the percentage of WEIs in each status, the total of which adds up to more than 100 percent since a WEI can fall into more than one category.

A summary analysis of each category is provided below.

⁶ The total average monthly TANF/SSP caseload for the April-June 2011 period was 1,925,804 families.

Table 4. Average Monthly Total Number of Work-Eligible Individuals (WEIs) by Participation Status, by State: Apr-Jun, 2011

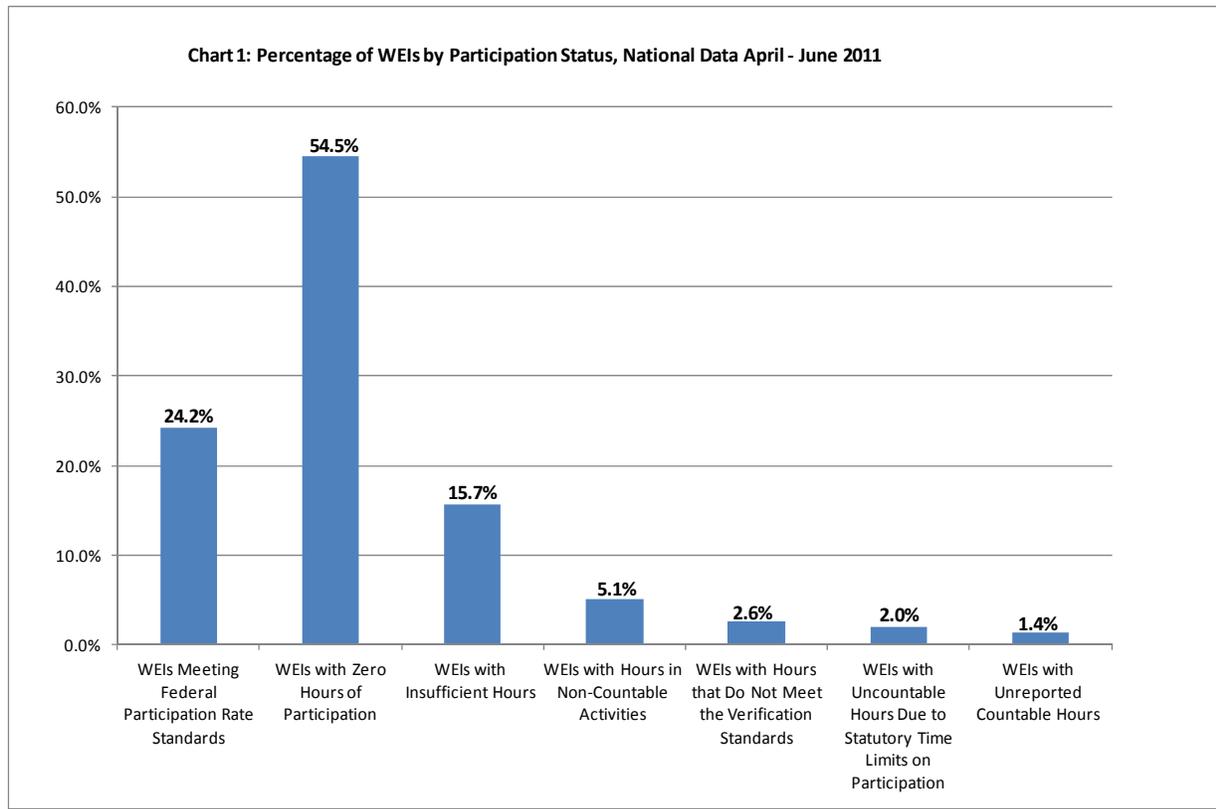
STATE	Total Number of WEIs	WEIs Meeting Federal Participation Rate Standards	WEIs with Zero Hours of Participation	WEIs with Insufficient Hours	WEIs with Hours in Non-Countable Activities	WEIs with Hours that Do Not Meet the Verification Standards	WEIs with Uncountable Hours Due to Statutory Time Limits on Participation	WEIs with Unreported Countable Hours
UNITED STATES	1,236,796	299,518	673,629	193,935	62,460	32,627	24,620	17,234
ALABAMA	14,894	4,944	8,005	1,487	244	296	0	0
ALASKA	3,154	721	231	567	1,693	16	32	52
ARIZONA	10,742	2,547	7,012	1,296	1,183	36	0	0
ARKANSAS	4,711	1,022	3,243	678	31	0	0	0
CALIFORNIA	436,164	101,381	253,872	73,807	12,899	7,856	3,928	2,619
COLORADO	8,629	2,121	4,999	1,335	424	0	109	0
CONNECTICUT	8,713	3,845	3,288	1,586	444	0	406	0
DELAWARE	2,318	717	1,176	287	9	182	18	178
DIST. OF COL.	6,194	786	4,868	133	0	146	0	312
FLORIDA	14,245	6,202	5,198	1,395	1,749	0	20	581
GEORGIA	3,343	1,459	1,082	775	26	0	0	0
GUAM	NR	NR	NR	NR	NR	NR	NR	NR
HAWAII	9,125	2,588	5,452	1,043	42	19	42	0
IDAHO	217	90	12	52	77	37	5	48
ILLINOIS	13,627	4,767	8,818	2,183	42	0	119	0
INDIANA	17,451	2,623	11,458	3,309	0	0	255	0
IOWA	13,929	4,779	5,309	3,607	210	0	188	0
KANSAS	12,031	2,908	4,565	3,174	1,766	311	90	0
KENTUCKY	12,993	5,117	5,835	1,239	133	667	3	0
LOUISIANA	3,450	1,121	1,348	495	545	0	113	0
MAINE	14,995	2,159	8,572	2,865	16	3,345	328	0
MARYLAND	15,865	5,484	7,684	1,537	351	51	74	685
MASSACHUSETTS	31,117	3,046	23,671	1,815	1,144	1,457	0	0
MICHIGAN	47,309	9,968	25,184	10,042	99	394	2,566	2,443
MINNESOTA	13,976	4,077	5,180	3,638	1,787	0	187	0
MISSISSIPPI	4,796	4,044	157	752	0	0	401	0
MISSOURI	30,126	5,076	21,906	2,358	52	734	0	0
MONTANA	2,496	486	1,150	790	240	0	0	0
NEBRASKA	4,195	1,955	1,428	397	13	25	133	254
NEVADA	6,557	2,074	2,586	998	963	242	0	313
NEW HAMPSHIRE	3,639	1,379	2,040	220	3	0	0	151
NEW JERSEY	25,289	4,277	17,474	2,775	0	0	1,638	687
NEW MEXICO	14,137	4,111	8,772	1,254	0	0	6	0
NEW YORK	103,056	26,801	44,993	17,722	11,596	4,035	2,216	0
NORTH CAROLINA	6,021	2,253	1,864	871	1,382	0	2	0
NORTH DAKOTA	936	475	285	172	2	5	2	0
OHIO	58,627	14,170	35,187	6,981	1,288	413	675	0
OKLAHOMA	3,417	1,043	1,457	656	365	0	127	0
OREGON	30,256	1,751	22,982	4,599	2,298	0	1,679	0
PENNSYLVANIA	38,568	9,258	16,059	4,757	6,119	3,542	397	399
PUERTO RICO	14,249	3,227	10,101	282	0	0	0	615
RHODE ISLAND	4,807	433	3,169	959	0	163	82	0
SOUTH CAROLINA	12,379	4,357	6,134	1,822	0	140	53	9
SOUTH DAKOTA	1,096	440	384	272	0	0	0	0
TENNESSEE	45,435	8,598	26,433	10,404	0	0	3,206	0
TEXAS	15,676	6,971	8,049	655	0	0	0	0
UTAH	3,184	822	589	744	1,010	0	103	0
VERMONT	2,163	659	865	263	395	25	8	46
VIRGIN ISLANDS	381	45	310	25	0	0	0	0
VIRGINIA	23,309	10,205	9,909	1,901	162	81	1,010	405
WASHINGTON	43,143	4,925	18,892	9,170	7,255	8,409	4,359	0
WEST VIRGINIA	5,652	1,706	3,071	637	249	0	40	0
WISCONSIN	13,913	3,441	1,303	3,147	4,142	0	0	7,437
WYOMING	101	64	18	7	12	0	0	0

NR = Not reported.

Table 5. Percentage of Work-Eligible Individuals (WEIs) by Participation Status, by State: Apr-Jun, 2011

STATE	Total Number of WEIs	WEIs Meeting Federal Participation Rate Standards	WEIs with Zero Hours of Participation	WEIs with Insufficient Hours	WEIs with Hours in Non-Countable Activities	WEIs with Hours that Do Not Meet the Verification Standards	WEIs with Uncountable Hours Due to Statutory Time Limits on Participation	WEIs with Unreported Countable Hours
UNITED STATES	1,236,796	24.2%	54.5%	15.7%	5.1%	2.6%	2.0%	1.4%
ALABAMA	14,894	33.2%	53.7%	10.0%	1.6%	2.0%	0.0%	0.0%
ALASKA	3,154	22.9%	7.3%	18.0%	53.7%	0.5%	1.0%	1.6%
ARIZONA	10,742	23.7%	65.3%	12.1%	11.0%	0.3%	0.0%	0.0%
ARKANSAS	4,711	21.7%	68.8%	14.4%	0.7%	0.0%	0.0%	0.0%
CALIFORNIA	436,164	23.2%	58.2%	16.9%	3.0%	1.8%	0.9%	0.6%
COLORADO	8,629	24.6%	57.9%	15.5%	4.9%	0.0%	1.3%	0.0%
CONNECTICUT	8,713	44.1%	37.7%	18.2%	5.1%	0.0%	4.7%	0.0%
DELAWARE	2,318	30.9%	50.7%	12.4%	0.4%	7.9%	0.8%	7.7%
DIST. OF COL.	6,194	12.7%	78.6%	2.1%	0.0%	2.4%	0.0%	5.0%
FLORIDA	14,245	43.5%	36.5%	9.8%	12.3%	0.0%	0.1%	4.1%
GEORGIA	3,343	43.6%	32.4%	23.2%	0.8%	0.0%	0.0%	0.0%
GUAM	NR	NR	NR	NR	NR	NR	NR	NR
HAWAII	9,125	28.4%	59.7%	11.4%	0.5%	0.2%	0.5%	0.0%
IDAHO	217	41.5%	5.5%	24.0%	35.5%	17.1%	2.3%	22.1%
ILLINOIS	13,627	35.0%	64.7%	16.0%	0.3%	0.0%	0.9%	0.0%
INDIANA	17,451	15.0%	65.7%	19.0%	0.0%	0.0%	1.5%	0.0%
IOWA	13,929	34.3%	38.1%	25.9%	1.5%	0.0%	1.3%	0.0%
KANSAS	12,031	24.2%	37.9%	26.4%	14.7%	2.6%	0.7%	0.0%
KENTUCKY	12,993	39.4%	44.9%	9.5%	1.0%	5.1%	0.0%	0.0%
LOUISIANA	3,450	32.5%	39.1%	14.3%	15.8%	0.0%	3.3%	0.0%
MAINE	14,995	14.4%	57.2%	19.1%	0.1%	22.3%	2.2%	0.0%
MARYLAND	15,865	34.6%	48.4%	9.7%	2.2%	0.3%	0.5%	4.3%
MASSACHUSETTS	31,117	9.8%	76.1%	5.8%	3.7%	4.7%	0.0%	0.0%
MICHIGAN	47,309	21.1%	53.2%	21.2%	0.2%	0.8%	5.4%	5.2%
MINNESOTA	13,976	29.2%	37.1%	26.0%	12.8%	0.0%	1.3%	0.0%
MISSISSIPPI	4,796	84.3%	3.3%	15.7%	0.0%	0.0%	8.4%	0.0%
MISSOURI	30,126	16.8%	72.7%	7.8%	0.2%	2.4%	0.0%	0.0%
MONTANA	2,496	19.5%	46.1%	31.7%	9.6%	0.0%	0.0%	0.0%
NEBRASKA	4,195	46.6%	34.0%	9.5%	0.3%	0.6%	3.2%	6.1%
NEVADA	6,557	31.6%	39.4%	15.2%	14.7%	3.7%	0.0%	4.8%
NEW HAMPSHIRE	3,639	37.9%	56.1%	6.0%	0.1%	0.0%	0.0%	4.1%
NEW JERSEY	25,289	16.9%	69.1%	11.0%	0.0%	0.0%	6.5%	2.7%
NEW MEXICO	14,137	29.1%	62.0%	8.9%	0.0%	0.0%	0.0%	0.0%
NEW YORK	103,056	26.0%	43.7%	17.2%	11.3%	3.9%	2.2%	0.0%
NORTH CAROLINA	6,021	37.4%	31.0%	14.5%	23.0%	0.0%	0.0%	0.0%
NORTH DAKOTA	936	50.7%	30.4%	18.4%	0.2%	0.5%	0.2%	0.0%
OHIO	58,627	24.2%	60.0%	11.9%	2.2%	0.7%	1.2%	0.0%
OKLAHOMA	3,417	30.5%	42.6%	19.2%	10.7%	0.0%	3.7%	0.0%
OREGON	30,256	5.8%	76.0%	15.2%	7.6%	0.0%	5.5%	0.0%
PENNSYLVANIA	38,568	24.0%	41.6%	12.3%	15.9%	9.2%	1.0%	1.0%
PUERTO RICO	14,249	22.6%	70.9%	2.0%	0.0%	0.0%	0.0%	4.3%
RHODE ISLAND	4,807	9.0%	65.9%	20.0%	0.0%	3.4%	1.7%	0.0%
SOUTH CAROLINA	12,379	35.2%	49.6%	14.7%	0.0%	1.1%	0.4%	0.1%
SOUTH DAKOTA	1,096	40.1%	35.0%	24.8%	0.0%	0.0%	0.0%	0.0%
TENNESSEE	45,435	18.9%	58.2%	22.9%	0.0%	0.0%	7.1%	0.0%
TEXAS	15,676	44.5%	51.3%	4.2%	0.0%	0.0%	0.0%	0.0%
UTAH	3,184	25.8%	18.5%	23.4%	31.7%	0.0%	3.2%	0.0%
VERMONT	2,163	30.5%	40.0%	12.2%	18.3%	1.2%	0.4%	2.1%
VIRGIN ISLANDS	381	11.8%	81.4%	6.6%	0.0%	0.0%	0.0%	0.0%
VIRGINIA	23,309	43.8%	42.5%	8.2%	0.7%	0.3%	4.3%	1.7%
WASHINGTON	43,143	11.4%	43.8%	21.3%	16.8%	19.5%	10.1%	0.0%
WEST VIRGINIA	5,652	30.2%	54.3%	11.3%	4.4%	0.0%	0.7%	0.0%
WISCONSIN	13,913	24.7%	9.4%	22.6%	29.8%	0.0%	0.0%	53.5%
WYOMING	101	63.4%	17.8%	6.9%	11.9%	0.0%	0.0%	0.0%

NR = Not reported.



WEIs Meeting Federal Participation Rate Standards

Nationally, the average monthly number of WEIs meeting the Federal participation rate standards was 299,518 WEIs, or 24.2 percent of WEIs (see Tables 4 and 5). These WEIs were engaged in a countable work activity for a sufficient number of hours for his or her family to count toward the work participation rate.

In fact, in most States, as described above, the percentage of WEIs counting toward the participation rate is likely to be lower than the official work participation rate. This is due to methodological differences between the calculations. For example, a family may include more than one WEI and the participation rate calculation excludes families with a WEI that can be disregarded, e.g., single parent families with a child under the age of one (for not more than 12 months over the WEI’s lifetime) and those who are subject to a work-related sanction (for up to three months in a 12-month period). The WEIs in these “disregarded” families are included in the analysis here but not counted in the Federal participation rate calculation unless they are actually participating (with no more than one WEI counted per family). As New York observed in its engagement report, its data show “that 26 percent of the WEIs are engaged in

federally-allowable activities for sufficient hours to meet the core and total requirements. Again, because this is an individual analysis, this 26 percent should not be interpreted as the official participation rate for the month, since that measure is case based, and the denominator would exclude many cases with a WEI. In fact, New York’s participation rate for the first three months of the current FFY is estimated to be 32.2 percent.”

California reported the largest average monthly number of WEIs meeting Federal participation rate standards, with 101,381 (23.2 percent of the State’s WEIs). Mississippi reported the highest percentage of its WEIs meeting Federal participation rate standards (84.3 percent), while Oregon reported the lowest percentage (5.8 percent).

WEIs with Zero Hours of Participation

Every State that submitted an ACF-812 form reported WEIs with zero hours of participation. Nationally, the average monthly number of WEIs with zero hours of participation in a countable or non-countable work activity was 673,629 (54.5 percent of WEIs). The data from States indicate that this represents a range of situations, including individuals who are non-compliant and are in the sanction process; individuals who the State or local agency has failed to engage; individuals who are not participating due to illness, disability, having a very young child, lack of needed child care; individuals not participating because they are in their first month of assistance or are awaiting the beginning of activity; and others. The reported data provides new detail on the share of those without hours of participation who fall into each of these, and other, categories.

Table 6 shows the number of WEIs with zero hours of participation broken down by principal reason; Table 7 expresses this number as a percent of WEIs with zero hours, while Table 8 shows the number as a percent of all WEIs. Below is a list of the status categories for WEIs with no reported hours in a countable or non-countable activity (listed in order based on the percentage of WEIs falling into the respective category, except “Other,” which is listed last because it consists of many different reasons for zero hours that do not fit in the other categories), and a summary of the data reported by States:

- **The WEI is: (1) in the process of being sanctioned (including fair hearing process); (2) is subject to a sanction for refusing to work (i.e., WEI’s assistance grant has been reduced) but is not disregarded due to the statutory limit on the disregard, or (3) subject to a non-work sanction:**⁷ (112,384 average monthly total number of WEIs; 16.7 percent of WEIs with zero hours; and 8.6 percent of all WEIs). For WEIs in this category, the State has imposed or is in the process of imposing a sanction for work-related non-compliance; however, this category does not include those WEIs who have been sanctioned, but are disregarded from the participation rate (because they have not been sanctioned for more than three months in the preceding 12-month period). Forty-six States listed this as the status of an individual with zero hours, with up to 39.5 percent of WEIs in Arizona falling into this category. Although States can disregard individuals subject to a work-related sanction for up to three months in a 12-month period, there is often a due process and conciliation period that occurs prior to the imposition of a sanction as the State and the WEI work to resolve issues of non-compliance. Some States have recommended that the disregard for a sanction begin as soon as participants have been told that their benefits will be reduced or terminated due to noncompliance with work requirements because of the time it takes to actually impose a sanction. Florida explained in its March report:

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.

⁷ According to the Urban Institute’s “The Welfare Rules Databook: State Policies as of July 2009” (http://www.acf.hhs.gov/programs/opre/welfare_employ/state_tanf/databook09/databook09.pdf), some States impose several types of behavioral requirements on individuals in the assistance unit, and non-compliance may result in a “non-work” sanction. These requirements may affect adults and/or children in the unit and may include requiring adult recipients to submit to drug testing, requiring dependent children to maintain adequate attendance in school, and immunization requirements. Fulfilling behavioral requirements can be a condition of initial and/or continuing eligibility.

This category also includes individuals who are not engaged and have been subject to a work-related sanction for more than three months, as well as those subject to any non-work-related sanction.

- **The family was disregarded from the participation rate because it was caring for a young child, subject to a work-related sanction, or participating in a Tribal work program:**⁸ (100,495 average monthly total number of WEIs; 14.9 percent of WEIs with zero hours; and 7.6 percent of all WEIs). Forty-six States reported disregarding WEIs that were caring for a child under age one (for not more than 12 months over the WEI's lifetime), were subject to a work-related sanction for no more than three months in the preceding 12-month period, or were participating in a Tribal work program. Montana reported the largest share of WEIs in this category with 32 percent of its WEIs being disregarded from the participation rate for one or more of these reasons. Nationally, data from monthly work participation reporting in FY 2009 indicate that approximately 82 percent of this group is comprised of single parents with children under age one; 16 percent are subject to sanction; and 2 percent are in Tribal work programs. In most States, the number reported in this category should be less than the number that would actually be disregarded in the calculation of the work participation rates, because some of those reported as engaged, but not counting towards the Federal work rate, could also be disregarded. It appears that at least one State also included WEIs in this category even though they could have been classified in one of the other engagement categories. One State explains:

⁸ As per 407(b)(1)(B)(ii)(II) of the Social Security Act, a State may disregard from the work participation rate families with a WEI that are subject to a penalty for refusing to work in that month, unless that family has been penalized for refusal to participate in work activities for more than three of the last 12 months. As per 407(b)(5) of the Act, a State may, at its option, not require an individual who is single custodial parent caring for a child who has not attained 12 months of age to engage in work, and may disregard such an individual in determining the participation rates for not more than 12 months over the WEI's lifetime. As per 407(b)(4) of the Act, a State has the option to include individuals receiving assistance under a Tribal family assistance plan or Tribal work program.

[This State] would note that even though the individuals are coded as being disregarded in the TANF File, it does not mean they did not do any activities, but rather that we have chosen to code them as disregarded initially and then, upon subsequent notification from ACF that they have sufficient hours to be counted in full, their status is updated and corrections submitted. We feel it may be misleading to note in the overall ACF report to Congress that the individuals who are disregarded did zero hours.

- **The State or local agency failed to engage the WEI:** (91,798 average monthly total number of WEIs; 13.6 percent of WEIs with zero hours; and 6.9 percent of all WEIs). Thirty-nine States reported that they failed to engage WEIs on their caseload. The highest percentages of WEIs not engaged were reported by the Virgin Islands, Hawaii, and Rhode Island (63 percent, 57.4 percent, and 43.4 percent, respectively).
- **The State exempted the WEI due to illness or disability:** (80,330 average monthly total number of WEIs; 11.9 percent of WEIs with zero hours; and 6.2 percent of all WEIs). Although individuals who are ill or disabled (and who do not receive Supplemental Security Disability Insurance [SSDI] or Social Security Income [SSI]) remain subject to Federal work participation requirements, forty-two States exempt such WEIs from work requirements at the State level. In some cases, these individuals may be referred to SSDI or SSI.
- **Other State exemptions,** meaning WEIs exempted under State policies to exempt certain individuals from work requirements: (57,600 average monthly total number of WEIs; 8.6 percent of WEIs with zero hours; and 4.4 percent of all WEIs). States are free to develop their own exemption policies, though a State's participation rate is still calculated based on the number of WEIs in the State, even if they are exempt under State law or policies, e.g., individuals over the age of 60, or living in a remote area. Twenty-five States listed this as a factor for non-participation, with up to 14.8 percent of WEIs in Massachusetts falling into this category.
- **The family is in its first month on assistance and no activity has been assigned:** (29,979 average monthly total number of WEIs; 4.5 percent of WEIs with zero hours; and 2.4 percent of all WEIs). Forty-three States listed this as a factor for non-participation, with up to 12.5 percent of WEIs in Indiana falling into this category. During the first month of assistance,

case managers often work with WEIs to develop an employment plan, including addressing issues related to child care, transportation, and other needs related to engaging in program activities or employment. States often express frustration with having to include in the work participation rates a WEI in a family that has just accessed TANF assistance since that family may have other needs that must be addressed before the WEI can begin work activities.

California explains:

The current calculation for the overall work participation rate does not take into account the processing time needed to provide necessary family stabilization services prior to engagement ... Many clients that apply for aid do so in a 'crisis' situation and need stabilization services before participation in work activities can begin, such as child care and transportation arrangements. As a result, it is often not realistic to have clients engaged in work activities before the third month of aid.

- **The WEI has been assigned to an activity that has not yet begun:** (22,688 average monthly total number of WEIs; 3.4 percent of WEIs with zero hours; and 1.9 percent of all WEIs). This can occur when WEIs are between semesters at school or between activities, e.g., waiting for a work experience/community service position to be created after participating in job search/job readiness assistance. Thirty-five States listed this as a factor for non-participation, with up to 34.6 percent of WEIs in the District of Columbia falling into this category.
- **The State chose to exempt the WEI from work requirements because he or she is a single parent with a child under one, but is not disregarded from the work participation rate:** (21,905 average monthly total number of WEIs; 3.3 percent of WEIs with zero hours; and 1.8 percent of all WEIs). The disregard for a child under one for the Federal work participation rate is limited to 12 months in a lifetime per WEI. WEIs classified in this category may include those who are no longer eligible for this disregard due to this limit, or the State may simply have chosen not to use the disregard because it does not need to disregard the family to meet the work participation rate (thereby "saving up" months for which this disregard is in effect for a WEI). Seventeen States listed this as a factor for non-participation, with up to 21.6 percent of WEIs in Oregon falling into this category.

- **The State exempted the WEI because he or she has a child under the age of six and needed child care is not available:** (15,077 average monthly total number of WEIs; 2.2 percent of WEIs with zero hours; and 1.0 percent of all WEIs). If an individual is a single custodial parent caring for a child under six, the State may not reduce or terminate assistance based on the parent’s refusal to engage in required work if he or she demonstrates an inability to obtain needed child care. Thirteen States also exempt these individuals from work participation rates at the State level, even though they remain in the calculation of the Federal work participation rate.
- **The WEI relocated from one jurisdiction within the State to another:** (6,388 average monthly total number of WEIs; 0.9 percent of WEIs with zero hours; and 0.5 percent of all WEIs). Twenty-five States listed this as a factor for non-participation, with up to 6.8 percent of WEIs in Maine falling into this category.
- **Good cause exemption**, meaning that the WEI has demonstrated “good cause” (as defined by the State) to explain why he or she did not participate in an activity, e.g., lack of access to transportation, natural disaster: (6,140 average monthly total number of WEIs; 0.9 percent of WEIs with zero hours; and 0.5 percent of all WEIs). Twenty-two States listed this as a factor for non-participation, with up to 9.7 percent of WEIs in Oklahoma falling into this category.
- **The State exempted the WEI due to illness or disability of child or other family member:** (5,693 average monthly total number of WEIs; 0.8 percent of WEIs with zero hours; and 0.4 percent of all WEIs). Twenty-two States listed this as a factor for non-participation, with up to 5.3 percent of WEIs in Maryland falling into this category.
- **The WEI is exempted under a domestic violence waiver:** (4,553 average monthly total number of WEIs; 0.7 percent of WEIs with zero hours; and 0.4 percent of all WEIs).⁹ Twenty-one States listed this as a factor for non-participation, with up to 6.7 percent of WEIs in New Jersey falling into this category.

⁹ Under section 402(a)(7) of the Social Security Act, under its TANF plan, a State may elect to implement a special program to serve victims of domestic violence and to waive program requirements for such individuals.

- **The work activity reports were received too late for inclusion:** (3,931 average monthly total number of WEIs; 0.6 percent of WEIs with zero hours; and 0.3 percent of all WEIs). Eleven States listed this as a factor for non-participation, with up to 5.1 percent of WEIs in South Carolina falling into this category.
- **Other Status Not identified on ACF-812:** (114,667 average monthly total number of WEIs; 17 percent of WEIs with zero hours; and 9.3 percent of all WEIs). States also were able to list other reasons for WEI having zero hours of participation. Some additional explanations for why WEIs had zero hours of participation include that an assessment was pending; the WEI was in his or her last month of assistance or reached time limit for assistance; the case was closed mid-month; the WEI missed his or her appointment to update employment plan; WEI did not attend a scheduled activity; and a lack of transportation or housing.

A common reason for having zero hours of participation was that the WEI is a member of a two-parent family where the other WEI adult is meeting work requirements. This is because this group has little or no incentive to participate or the State may not be extending or offering employment services to the second parent since their hours are not needed in order for the family to count toward the overall rate. One State identified other WEIs who are not considered in the participation rate calculation, and states, “After reviewing the data, we are confident that the number of non-participating WEI’s with a reason of ‘Other’ is accurate. Most of these individuals are TANF timed-out or drug felons. In [this State], these groups of adults are not aided and have little incentive to participate. Their children, if eligible, continue to receive assistance.”

In some cases, other reasons for zero hours of participation suggest a need to engage the WEI in an activity that will move his or her family towards self-sufficiency; these included that the WEI lacked vocational skills; the WEI lacked a high school diploma or GED; or the WEI reached the time limit for assistance receipt in a prior month.¹⁰

¹⁰ It is possible these individuals continue be WEIs as non-recipient parents living with a child receiving assistance (i.e., a “child-only” cases), even though they have reached the time limit on assistance.

Some of the other reasons listed for zero hours of participation demonstrate inconsistencies with data reporting. States listed explanations that were either provided as options on the ACF-812 form, or that indicate that the WEI did not have zero hours of participation in any activity. For example, some States specified that the WEI was caring for a dependent with a learning disability or that the WEI was in his or her first month of assistance to explain why the WEI had zero hours of participation, even though they had the option of selecting these explanations among the pre-populated options.

Table 6. Average Monthly Number of Work-Eligible Individuals (WEIs) With Zero Hours of Participation By Principal Reason, by State: Apr-Jun, 2011

STATE	Number of WEIs with Zero Hours of Participation	WEI in Process of Being Sanctioned, or is Sanctioned and Not Disregarded	Family Disregarded from Participation Rate	State/Local Agency Failed to Engage WEI	State Exempt Due to Illness or Disability of the WEI	Other State Exemptions	Family's First Month on Assistance and No Activity Assigned	WEI Assigned to an Activity That Has Not Yet Begun	State Exempt, Single Custodial Parent with Child Under Age One, but Not Disregarded	State Exempt, Single Custodial Parent with Child Under Age Six and No Child Care Available	WEI Relocated from One Jurisdiction Within the State to Another	Good Cause Exemption	State Exempt Due to Illness or Disability of a Child or Other Family Member	State Exempt Under a Domestic Violence Waiver	Work Activity Reports Received Too Late for Inclusion	Other
UNITED STATES	673,629	112,384	100,495	91,798	80,330	57,600	29,979	22,688	21,905	15,077	6,388	6,140	5,693	4,553	3,931	114,667
ALABAMA	8,005	865	1,460	134	1,214	975	1,652	785	0	27	82	0	0	0	189	622
ALASKA	231	31	53	0	11	0	37	0	0	0	0	0	16	0	0	84
ARIZONA	7,012	4,245	0	0	732	0	0	0	846	2	0	0	3	237	0	947
ARKANSAS	3,243	447	1,391	59	256	251	476	5	18	17	11	22	16	31	20	225
CALIFORNIA	253,872	47,129	25,139	28,861	24,361	42,085	5,840	4,950	1,418	13,057	3,278	278	1,642	0	0	55,835
COLORADO	4,999	101	935	0	813	0	15	0	0	19	111	0	0	96	0	2,907
CONNECTICUT	3,288	0	1,795	1,052	0	200	210	0	0	0	0	0	31	0	0	0
DELAWARE	1,176	200	646	13	287	0	0	0	0	0	0	0	0	0	13	17
DIST. OF COL.	4,868	0	1,714	941	0	0	72	2,141	0	0	0	0	0	0	0	0
FLORIDA	5,198	1,034	1,445	113	997	0	225	1,012	95	0	0	0	104	9	0	164
GEORGIA	1,082	51	547	6	178	0	121	44	26	19	12	0	7	13	0	57
GUAM	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
HAWAII	5,452	61	0	5,242	35	0	4	96	1	0	2	9	1	0	0	0
IDAHO	12	11	0	1	0	0	0	0	0	0	0	0	0	0	0	0
ILLINOIS	8,818	493	1,196	3,514	0	715	889	0	0	0	0	0	132	0	0	1,879
INDIANA	11,458	1,284	1,287	1,238	1,570	499	2,182	1,699	164	0	0	230	523	0	0	782
IOWA	5,309	1,777	469	864	0	0	210	0	0	0	24	0	0	0	0	1,966
KANSAS	4,565	321	817	1,453	786	0	326	293	0	0	98	0	0	143	0	327
KENTUCKY	5,835	1,151	2,257	0	678	0	691	0	0	1	0	0	7	31	3	1,015
LOUISIANA	1,348	90	146	901	73	0	53	73	0	0	4	8	0	0	0	0
MAINE	8,572	541	274	340	2,419	89	711	504	0	6	1,016	47	229	4	0	2,392
MARYLAND	7,684	1,996	2,664	345	1,282	122	0	17	0	53	126	0	834	142	0	103
MASSACHUSETTS	23,671	5,093	5,076	768	5,703	4,617	271	751	0	0	95	376	0	282	0	638
MICHIGAN	25,184	3,936	0	8,188	295	694	0	99	7,398	0	197	1,152	922	228	0	2,074
MINNESOTA	5,180	770	2,684	93	0	117	394	0	117	0	117	70	0	0	376	444
MISSISSIPPI	157	142	0	15	0	0	0	0	0	0	0	0	0	0	0	0
MISSOURI	21,906	1,569	4,988	11,736	823	5	730	156	939	0	0	0	11	104	0	845
MONTANA	1,150	277	798	0	73	0	0	0	0	1	0	0	0	0	0	0
NEBRASKA	1,428	278	589	89	0	335	55	8	8	0	8	11	0	0	47	0
NEVADA	2,586	566	80	38	496	0	514	73	230	16	0	0	92	0	0	481
NEW HAMPSHIRE	2,040	204	658	0	826	146	89	0	0	0	0	0	5	35	0	77
NEW JERSEY	17,474	930	3,149	2,817	1,304	1,097	1,880	1,319	147	0	0	0	0	1,685	461	2,683
NEW MEXICO	8,772	2,545	2,269	1,205	1,351	570	365	34	0	0	48	122	73	0	0	190
NEW YORK	44,993	16,236	5,910	1,959	16,207	0	1,626	1,768	34	0	181	0	71	819	0	183
NORTH CAROLINA	1,864	0	109	0	267	0	454	38	0	0	0	45	1	0	1	949
NORTH DAKOTA	285	101	98	14	34	1	3	4	0	5	3	0	0	2	0	20
OHIO	35,187	4,032	6,125	9,155	87	0	1,746	1,476	0	1,476	91	907	0	0	359	9,733
OKLAHOMA	1,457	329	546	0	57	0	29	154	0	0	13	330	0	0	0	0
OREGON	22,982	0	0	1,594	0	44	1,114	516	6,549	0	0	0	0	0	0	13,167
PENNSYLVANIA	16,059	4,062	4,756	1,969	1,202	1,220	486	89	0	0	234	801	249	552	0	438
PUERTO RICO	10,101	46	1,365	236	1,766	24	222	93	0	93	0	260	236	0	0	5,760
RHODE ISLAND	3,169	1	426	2,085	43	265	158	62	0	0	35	0	32	58	4	0
SOUTH CAROLINA	6,134	524	2,044	980	0	0	360	218	0	0	113	179	99	0	634	984
SOUTH DAKOTA	384	36	217	0	80	0	5	0	0	0	0	46	0	0	0	0
TENNESSEE	26,433	3,143	6,287	561	6,936	2,116	1,386	627	1,730	0	314	0	0	0	1,576	1,758
TEXAS	8,049	1,820	979	0	726	1,329	1,718	0	0	0	0	783	349	0	0	345
UTAH	589	58	250	0	280	0	0	0	0	0	0	0	0	0	0	0
VERMONT	865	32	139	27	81	3	216	14	5	0	0	0	0	3	0	346
VIRGIN ISLANDS	310	34	0	240	14	0	19	0	0	0	0	0	4	0	0	0
VIRGINIA	9,909	1,578	40	2,831	3,274	40	973	647	81	242	40	40	0	0	0	121
WASHINGTON	18,892	2,011	5,199	0	2,088	0	1,423	1,590	2,073	40	135	398	4	49	247	3,634
WEST VIRGINIA	3,071	172	862	0	549	41	0	1,235	0	3	0	0	0	5	0	204
WISCONSIN	1,303	25	605	121	76	0	28	98	26	0	0	26	0	25	1	271
WYOMING	18	6	12	0	0	0	1	0	0	0	0	0	0	0	0	0

NR = Not reported.

Table 7. Percent of Work-Eligible Individuals (WEIs) With Zero Hours of Participation By Principal Reason, by State: Apr-Jun, 2011

STATE	Number of WEIs with Zero Hours of Participation	WEI in Process of Being Sanctioned, or is Sanctioned and Not Disregarded	Family Disregarded from Participation Rate	State/Local Agency Failed to Engage WEI	State Exempt Due to Illness or Disability of the WEI	Other State Exemptions	Family's First Month on Assistance and No Activity Assigned	WEI Assigned to an Activity That Has Not Yet Begun	State Exempt, Single Custodial Parent with Child Under Age One, but Not Disregarded	State Exempt, Single Custodial Parent with Child Under Age Six and No Child Care Available	WEI Relocated from One Jurisdiction Within the State to Another	Good Cause Exemption	State Exempt Due to Illness or Disability of a Child or Other Family Member	State Exempt Under a Domestic Violence Waiver	Work Activity Reports Received Too Late for Inclusion	Other
UNITED STATES	673,629	16.7%	14.9%	13.6%	11.9%	8.6%	4.5%	3.4%	3.3%	2.2%	0.9%	0.9%	0.8%	0.7%	0.6%	17.0%
ALABAMA	8,005	10.8%	18.2%	1.7%	15.2%	12.2%	20.6%	9.8%	0.0%	0.3%	1.0%	0.0%	0.0%	0.0%	2.4%	7.8%
ALASKA	231	13.4%	22.9%	0.0%	4.8%	0.0%	16.0%	0.0%	0.0%	0.0%	0.0%	0.0%	6.9%	0.0%	0.0%	36.4%
ARIZONA	7,012	60.5%	0.0%	0.0%	10.4%	0.0%	0.0%	0.0%	12.1%	0.0%	0.0%	0.0%	0.0%	3.4%	0.0%	13.5%
ARKANSAS	3,243	13.8%	42.9%	1.8%	7.9%	7.7%	14.7%	0.2%	0.6%	0.5%	0.3%	0.7%	0.5%	1.0%	0.6%	6.9%
CALIFORNIA	253,872	18.6%	9.9%	11.4%	9.6%	16.6%	2.3%	1.9%	0.6%	5.1%	1.3%	0.1%	0.6%	0.0%	0.0%	22.0%
COLORADO	4,999	2.0%	18.7%	0.0%	16.3%	0.0%	0.3%	0.0%	0.0%	0.4%	2.2%	0.0%	0.0%	1.9%	0.0%	58.2%
CONNECTICUT	3,288	0.0%	54.6%	32.0%	0.0%	6.1%	6.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.9%	0.0%	0.0%	0.0%
DELAWARE	1,176	17.0%	54.9%	1.1%	24.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.1%	1.4%
DIST. OF COL.	4,868	0.0%	35.2%	19.3%	0.0%	0.0%	1.5%	44.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
FLORIDA	5,198	19.9%	27.8%	2.2%	19.2%	0.0%	4.3%	19.5%	1.8%	0.0%	0.0%	0.0%	2.0%	0.2%	0.0%	3.2%
GEORGIA	1,082	4.7%	50.6%	0.6%	16.5%	0.0%	11.2%	4.1%	2.4%	1.8%	1.1%	0.0%	0.6%	1.2%	0.0%	5.3%
GUAM	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
HAWAII	5,452	1.1%	0.0%	96.1%	0.6%	0.0%	0.1%	1.8%	0.0%	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%
IDAHO	12	91.7%	0.0%	8.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
ILLINOIS	8,818	5.6%	13.6%	39.9%	0.0%	8.1%	10.1%	0.0%	0.0%	0.0%	0.0%	0.0%	1.5%	0.0%	0.0%	21.3%
INDIANA	11,458	11.2%	11.2%	10.8%	13.7%	4.4%	19.0%	14.8%	1.4%	0.0%	0.0%	2.0%	4.6%	0.0%	0.0%	6.8%
IOWA	5,309	33.5%	8.8%	16.3%	0.0%	0.0%	4.0%	0.0%	0.0%	0.0%	0.5%	0.0%	0.0%	0.0%	0.0%	37.0%
KANSAS	4,565	7.0%	17.9%	31.8%	17.2%	0.0%	7.1%	6.4%	0.0%	0.0%	2.1%	0.0%	0.0%	3.1%	0.0%	7.2%
KENTUCKY	5,835	19.7%	38.7%	0.0%	11.6%	0.0%	11.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.5%	0.1%	17.4%
LOUISIANA	1,348	6.7%	10.8%	66.8%	5.4%	0.0%	3.9%	5.4%	0.0%	0.0%	0.3%	0.6%	0.0%	0.0%	0.0%	0.0%
MAINE	8,572	6.3%	3.2%	4.0%	28.2%	1.0%	8.3%	5.9%	0.0%	0.1%	11.9%	0.5%	2.7%	0.0%	0.0%	27.9%
MARYLAND	7,684	26.0%	34.7%	4.5%	16.7%	1.6%	0.0%	0.2%	0.0%	0.7%	1.6%	0.0%	10.9%	1.8%	0.0%	1.3%
MASSACHUSETTS	23,671	21.5%	21.4%	3.2%	24.1%	19.5%	1.1%	3.2%	0.0%	0.0%	0.4%	1.6%	0.0%	1.2%	0.0%	2.7%
MICHIGAN	25,184	15.6%	0.0%	32.5%	1.2%	2.8%	0.0%	0.4%	29.4%	0.0%	0.8%	4.6%	3.7%	0.9%	0.0%	8.2%
MINNESOTA	5,180	14.9%	51.8%	1.8%	0.0%	2.3%	7.6%	0.0%	2.3%	0.0%	2.3%	1.4%	0.0%	0.0%	7.3%	8.6%
MISSISSIPPI	157	90.4%	0.0%	9.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
MISSOURI	21,906	7.2%	22.8%	53.6%	3.8%	0.0%	3.3%	0.7%	4.3%	0.0%	0.0%	0.0%	0.1%	0.5%	0.0%	3.9%
MONTANA	1,150	24.1%	69.4%	0.0%	6.3%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
NEBRASKA	1,428	19.5%	41.2%	6.2%	0.0%	23.5%	3.9%	0.6%	0.6%	0.0%	0.6%	0.8%	0.0%	0.0%	3.3%	0.0%
NEVADA	2,586	21.9%	3.1%	1.5%	19.2%	0.0%	19.9%	2.8%	8.9%	0.6%	0.0%	0.0%	3.6%	0.0%	0.0%	18.6%
NEW HAMPSHIRE	2,040	10.0%	32.3%	0.0%	40.5%	7.2%	4.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	1.7%	0.0%	3.8%
NEW JERSEY	17,474	5.3%	18.0%	16.1%	7.5%	6.3%	10.8%	7.5%	0.8%	0.0%	0.0%	0.0%	0.0%	9.6%	2.6%	15.4%
NEW MEXICO	8,772	29.0%	25.9%	13.7%	15.4%	6.5%	4.2%	0.4%	0.0%	0.0%	0.5%	1.4%	0.8%	0.0%	0.0%	2.2%
NEW YORK	44,993	36.1%	13.1%	4.4%	36.0%	0.0%	3.6%	3.9%	0.1%	0.0%	0.4%	0.0%	0.2%	1.8%	0.0%	0.4%
NORTH CAROLINA	1,864	0.0%	5.8%	0.0%	14.3%	0.0%	24.4%	2.0%	0.0%	0.0%	0.0%	2.4%	0.1%	0.0%	0.1%	50.9%
NORTH DAKOTA	285	35.4%	34.4%	4.9%	11.9%	0.4%	1.1%	1.4%	0.0%	1.8%	1.1%	0.0%	0.0%	0.7%	0.0%	7.0%
OHIO	35,187	11.5%	17.4%	26.0%	0.2%	0.0%	5.0%	4.2%	0.0%	4.2%	0.3%	2.6%	0.0%	0.0%	1.0%	27.7%
OKLAHOMA	1,457	22.6%	37.5%	0.0%	3.9%	0.0%	2.0%	10.6%	0.0%	0.0%	0.9%	22.6%	0.0%	0.0%	0.0%	0.0%
OREGON	22,982	0.0%	0.0%	6.9%	0.0%	0.2%	4.8%	2.2%	28.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	57.3%
PENNSYLVANIA	16,059	25.3%	29.6%	12.3%	7.5%	7.6%	3.0%	0.6%	0.0%	0.0%	1.5%	5.0%	1.6%	3.4%	0.0%	2.7%
PUERTO RICO	10,101	0.5%	13.5%	2.3%	17.5%	0.2%	2.2%	0.9%	0.0%	0.9%	0.0%	2.6%	2.3%	0.0%	0.0%	57.0%
RHODE ISLAND	3,169	0.0%	13.4%	65.8%	1.4%	8.4%	5.0%	2.0%	0.0%	0.0%	1.1%	0.0%	1.0%	1.8%	0.1%	0.0%
SOUTH CAROLINA	6,134	8.5%	33.3%	16.0%	0.0%	0.0%	5.9%	3.6%	0.0%	0.0%	1.8%	2.9%	1.6%	0.0%	10.3%	16.0%
SOUTH DAKOTA	384	9.4%	56.5%	0.0%	20.8%	0.0%	1.3%	0.0%	0.0%	0.0%	0.0%	12.0%	0.0%	0.0%	0.0%	0.0%
TENNESSEE	26,433	11.9%	23.8%	2.1%	26.2%	8.0%	5.2%	2.4%	6.5%	0.0%	1.2%	0.0%	0.0%	0.0%	6.0%	6.7%
TEXAS	8,049	22.6%	12.2%	0.0%	9.0%	16.5%	21.3%	0.0%	0.0%	0.0%	0.0%	9.7%	4.3%	0.0%	0.0%	4.3%
UTAH	589	9.8%	42.4%	0.0%	47.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
VERMONT	865	3.7%	16.1%	3.1%	9.4%	0.3%	25.0%	1.6%	0.6%	0.0%	0.0%	0.0%	0.0%	0.3%	0.0%	40.0%
VIRGIN ISLANDS	310	11.0%	0.0%	77.4%	4.5%	0.0%	6.1%	0.0%	0.0%	0.0%	0.0%	0.0%	1.3%	0.0%	0.0%	0.0%
VIRGINIA	9,909	15.9%	0.4%	28.6%	33.0%	0.4%	9.8%	6.5%	0.8%	2.4%	0.4%	0.4%	0.0%	0.0%	0.0%	1.2%
WASHINGTON	18,892	10.6%	27.5%	0.0%	11.1%	0.0%	7.5%	8.4%	11.0%	0.2%	0.7%	2.1%	0.0%	0.3%	1.3%	19.2%
WEST VIRGINIA	3,071	5.6%	28.1%	0.0%	17.9%	1.3%	0.0%	40.2%	0.0%	0.1%	0.0%	0.0%	0.0%	0.2%	0.0%	6.6%
WISCONSIN	1,303	1.9%	46.4%	9.3%	5.8%	0.0%	2.1%	7.5%	2.0%	0.0%	0.0%	2.0%	0.0%	1.9%	0.1%	20.8%
WYOMING	18	33.3%	66.7%	0.0%	0.0%	0.0%	5.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

NR = Not reported.

Table 8. Work-Eligible Individuals (WEIs) With Zero Hours of Participation By Principal Reason as a Percent of All Work-Eligible Individuals, by State: Apr-Jun, 2011

STATE	Number of WEIs with Zero Hours of Participation	WEI in Process of Being Sanctioned, or is Sanctioned and Not Disregarded	Family Disregarded from Participation Rate	State/Local Agency Failed to Engage WEI	State Exempt Due to Illness or Disability of the WEI	Other State Exemptions	Family's First Month on Assistance and No Activity Assigned	WEI Assigned to an Activity That Has Not Yet Begun	State Exempt, Single Custodial Parent with Child Under Age One, but Not Disregarded	State Exempt, Single Custodial Parent with Child Under Age Six and No Child Care Available	WEI Relocated from One Jurisdiction Within the State to Another	Good Cause Exemption	State Exempt Due to Illness or Disability of a Child or Other Family Member	State Exempt Under a Domestic Violence Waiver	Work Activity Reports Received Too Late for Inclusion	Other
UNITED STATES	54.5%	8.6%	7.6%	6.9%	6.2%	4.4%	2.4%	1.9%	1.7%	1.0%	0.5%	0.5%	0.4%	0.4%	0.3%	9.3%
ALABAMA	53.7%	5.8%	9.8%	0.9%	8.2%	6.5%	11.1%	5.3%	0.0%	0.2%	0.6%	0.0%	0.0%	0.0%	1.3%	4.2%
ALASKA	7.3%	1.0%	1.7%	0.0%	0.3%	0.0%	1.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%	0.0%	0.0%	2.7%
ARIZONA	65.3%	39.5%	0.0%	0.0%	6.8%	0.0%	0.0%	0.0%	7.9%	0.0%	0.0%	0.0%	0.0%	2.2%	0.0%	8.8%
ARKANSAS	68.8%	9.5%	29.5%	1.3%	5.4%	5.3%	10.1%	0.1%	0.4%	0.4%	0.2%	0.5%	0.3%	0.7%	0.4%	4.8%
CALIFORNIA	58.2%	10.8%	5.8%	6.6%	5.6%	9.6%	1.3%	1.1%	0.3%	3.0%	0.8%	0.1%	0.4%	0.0%	0.0%	12.8%
COLORADO	57.9%	1.2%	10.8%	0.0%	9.4%	0.0%	0.2%	0.0%	0.0%	0.2%	1.3%	0.0%	0.0%	1.1%	0.0%	33.7%
CONNECTICUT	37.7%	0.0%	20.6%	12.1%	0.0%	2.3%	2.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%	0.0%	0.0%	0.0%
DELAWARE	50.7%	8.6%	27.9%	0.6%	12.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.6%	0.7%
DIST. OF COL.	78.6%	0.0%	27.7%	15.2%	0.0%	0.0%	1.2%	34.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
FLORIDA	36.5%	7.3%	10.1%	0.8%	7.0%	0.0%	1.6%	7.1%	0.7%	0.0%	0.0%	0.0%	0.7%	0.1%	0.0%	1.2%
GEORGIA	32.4%	1.5%	16.4%	0.2%	5.3%	0.0%	3.6%	1.3%	0.8%	0.6%	0.4%	0.0%	0.2%	0.4%	0.0%	1.7%
GUAM	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
HAWAII	59.7%	0.7%	0.0%	57.4%	0.4%	0.0%	0.0%	1.1%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%
IDAHO	5.5%	5.1%	0.0%	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
ILLINOIS	64.7%	3.6%	8.8%	25.8%	0.0%	5.2%	6.5%	0.0%	0.0%	0.0%	0.0%	0.0%	1.0%	0.0%	0.0%	13.8%
INDIANA	65.7%	7.4%	7.4%	7.1%	9.0%	2.9%	12.5%	9.7%	0.9%	0.0%	0.0%	1.3%	3.0%	0.0%	0.0%	4.5%
IOWA	38.1%	12.8%	3.4%	6.2%	0.0%	0.0%	1.5%	0.0%	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	14.1%
KANSAS	37.9%	2.7%	6.8%	12.1%	6.5%	0.0%	2.7%	2.4%	0.0%	0.0%	0.8%	0.0%	0.0%	1.2%	0.0%	2.7%
KENTUCKY	44.9%	8.9%	17.4%	0.0%	5.2%	0.0%	5.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.2%	0.0%	7.8%
LOUISIANA	39.1%	2.6%	4.2%	26.1%	2.1%	0.0%	1.5%	2.1%	0.0%	0.0%	0.1%	0.2%	0.0%	0.0%	0.0%	0.0%
MAINE	57.2%	3.6%	1.8%	2.3%	16.1%	0.6%	4.7%	3.4%	0.0%	0.0%	6.8%	0.3%	1.5%	0.0%	0.0%	16.0%
MARYLAND	48.4%	12.6%	16.8%	2.2%	8.1%	0.8%	0.0%	0.1%	0.0%	0.3%	0.8%	0.0%	5.3%	0.9%	0.0%	0.6%
MASSACHUSETTS	76.1%	16.4%	16.3%	2.5%	18.3%	14.8%	0.9%	2.4%	0.0%	0.0%	0.3%	1.2%	0.0%	0.9%	0.0%	2.1%
MICHIGAN	53.2%	8.3%	0.0%	17.3%	0.6%	1.5%	0.0%	0.2%	15.6%	0.0%	0.4%	2.4%	1.9%	0.5%	0.0%	4.4%
MINNESOTA	37.1%	5.5%	19.2%	0.7%	0.0%	0.8%	2.8%	0.0%	0.8%	0.0%	0.8%	0.5%	0.0%	0.0%	2.7%	3.2%
MISSISSIPPI	3.3%	3.0%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
MISSOURI	72.7%	5.2%	16.6%	39.0%	2.7%	0.0%	2.4%	0.5%	3.1%	0.0%	0.0%	0.0%	0.0%	0.3%	0.0%	2.8%
MONTANA	46.1%	11.1%	32.0%	0.0%	2.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
NEBRASKA	34.0%	6.6%	14.0%	2.1%	0.0%	8.0%	1.3%	0.2%	0.2%	0.0%	0.2%	0.3%	0.0%	0.0%	1.1%	0.0%
NEVADA	39.4%	8.6%	1.2%	0.6%	7.6%	0.0%	7.8%	1.1%	3.5%	0.2%	0.0%	0.0%	1.4%	0.0%	0.0%	7.3%
NEW HAMPSHIRE	56.1%	5.6%	18.1%	0.0%	22.7%	4.0%	2.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	1.0%	0.0%	2.1%
NEW JERSEY	69.1%	3.7%	12.5%	11.1%	5.2%	4.3%	7.4%	5.2%	0.6%	0.0%	0.0%	0.0%	0.0%	6.7%	1.8%	10.6%
NEW MEXICO	62.0%	18.0%	16.1%	8.5%	9.6%	4.0%	2.6%	0.2%	0.0%	0.0%	0.3%	0.9%	0.5%	0.0%	0.0%	1.3%
NEW YORK	43.7%	15.8%	5.7%	1.9%	15.7%	0.0%	1.6%	1.7%	0.0%	0.0%	0.2%	0.0%	0.1%	0.8%	0.0%	0.2%
NORTH CAROLINA	31.0%	0.0%	1.8%	0.0%	4.4%	0.0%	7.5%	0.6%	0.0%	0.0%	0.0%	0.7%	0.0%	0.0%	0.0%	15.8%
NORTH DAKOTA	30.4%	10.8%	10.5%	1.5%	3.6%	0.1%	0.3%	0.4%	0.0%	0.5%	0.3%	0.0%	0.0%	0.2%	0.0%	2.1%
OHIO	60.0%	6.9%	10.4%	15.6%	0.1%	0.0%	3.0%	2.5%	0.0%	2.5%	0.2%	1.5%	0.0%	0.0%	0.6%	16.6%
OKLAHOMA	42.6%	9.6%	16.0%	0.0%	1.7%	0.0%	0.8%	4.5%	0.0%	0.0%	0.4%	9.7%	0.0%	0.0%	0.0%	0.0%
OREGON	76.0%	0.0%	0.0%	5.3%	0.0%	0.1%	3.7%	1.7%	21.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	43.5%
PENNSYLVANIA	41.6%	10.5%	12.3%	5.1%	3.1%	3.2%	1.3%	0.2%	0.0%	0.0%	0.6%	2.1%	0.6%	1.4%	0.0%	1.1%
PUERTO RICO	70.9%	0.3%	9.6%	1.7%	12.4%	0.2%	1.6%	0.7%	0.0%	0.7%	0.0%	1.8%	1.7%	0.0%	0.0%	40.4%
RHODE ISLAND	65.9%	0.0%	8.9%	43.4%	0.9%	5.5%	3.3%	1.3%	0.0%	0.0%	0.7%	0.0%	0.7%	1.2%	0.1%	0.0%
SOUTH CAROLINA	49.6%	4.2%	16.5%	7.9%	0.0%	0.0%	2.9%	1.8%	0.0%	0.0%	0.9%	1.4%	0.8%	0.0%	5.1%	7.9%
SOUTH DAKOTA	35.0%	3.3%	19.8%	0.0%	7.3%	0.0%	0.5%	0.0%	0.0%	0.0%	0.0%	4.2%	0.0%	0.0%	0.0%	0.0%
TENNESSEE	58.2%	6.9%	13.8%	1.2%	15.3%	4.7%	3.1%	1.4%	3.8%	0.0%	0.7%	0.0%	0.0%	0.0%	3.5%	3.9%
TEXAS	51.3%	11.6%	6.2%	0.0%	4.6%	8.5%	11.0%	0.0%	0.0%	0.0%	0.0%	5.0%	2.2%	0.0%	0.0%	2.2%
UTAH	18.5%	1.8%	7.9%	0.0%	8.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
VERMONT	40.0%	1.5%	6.4%	1.2%	3.7%	0.1%	10.0%	0.6%	0.2%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	16.0%
VIRGIN ISLANDS	81.4%	8.9%	0.0%	63.0%	3.7%	0.0%	5.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.0%	0.0%	0.0%	0.0%
VIRGINIA	42.5%	6.8%	0.2%	12.1%	14.0%	0.2%	4.2%	2.8%	0.3%	1.0%	0.2%	0.2%	0.0%	0.0%	0.0%	0.5%
WASHINGTON	43.8%	4.7%	12.1%	0.0%	4.8%	0.0%	3.3%	3.7%	4.8%	0.1%	0.3%	0.9%	0.0%	0.1%	0.6%	8.4%
WEST VIRGINIA	54.3%	3.0%	15.3%	0.0%	9.7%	0.7%	0.0%	21.9%	0.0%	0.1%	0.0%	0.0%	0.0%	0.1%	0.0%	3.6%
WISCONSIN	9.4%	0.2%	4.3%	0.9%	0.5%	0.0%	0.2%	0.7%	0.2%	0.0%	0.0%	0.2%	0.0%	0.2%	0.0%	1.9%
WYOMING	17.8%	5.9%	11.9%	0.0%	0.0%	0.0%	1.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

NR = Not reported.

WEIs with Insufficient Hours

If a WEI does not meet the minimum hourly participation requirements (i.e., he or she has insufficient hours of participation), his or her family cannot be included in the numerator of a State's overall work participation rate (unless another WEI in the family can satisfy fully the minimum requirements).¹¹

Table 9 summarizes the total average monthly number of WEIs with insufficient hours that were reported on TANF and SSP data reports, broken down by the number of hours in each countable work activity that were not reported by the State (see Appendix III for definitions of work activities). It shows that States reported an average monthly total of 193,935 WEIs (15.7 percent of all WEIs) with insufficient hours to satisfy the work participation requirements. Every State reported having WEIs with insufficient hours of participation.

California reported the largest average monthly number of WEIs with insufficient hours of participation (73,807 average monthly total number of WEIs, or 16.9 percent of the State's WEIs). Montana reported the highest percentage of its State's WEIs as having insufficient hours in a countable activity (31.7 percent). (See Table 5 for percentages.)

The total average monthly number of insufficient hours of participation in countable work activities was 10,514,565. As seen in Table 10, which presents the percentage of insufficient hours in a countable work activity, 43.4 percent of these hours were in unsubsidized employment, reflecting the extent of part-time employment among WEIs. This also reflects, in part, the fact that in many States, an individual entering full-time employment will lose eligibility for TANF assistance and therefore no longer count in the participation rate calculation. Part-time employment also may be highly variable as work schedules are often unpredictable, making scheduling additional "wrap-around" activities difficult; a State may prioritize helping the parent stay employed, even if only on a part-time basis. Furthermore, California observes:

Insufficient participation is often attributable to situations such as when the employer does not offer enough hours of work to fully meet federal participation requirements. For example, California has found that a large number of our TANF clients are participating with 29 hours of work per week. This may be attributable to employers that keep part-time employees below a threshold amount of hours to avoid triggering health care

¹¹ For the two-parent work participation rate, the hours of both WEIs can be included in the numerator of the participation rate calculation.

benefits... Additionally, part-time employment is unpredictable and varies greatly from month to month.

In some cases, the shortfall in hours might reflect the failure to complete all scheduled hours of participation. If so, some State engagement reports note that these families would be subject to a financial sanction unless they have good cause or are otherwise excused from participation. In addition, other States noted that insufficient hours to satisfy the work participation requirements could stem from WEIs not completing their work activity plans and a variety of other reasons.

For example, Tennessee's engagement report states:

Insufficient work hours could result from a number of situations beyond client non-cooperation. Our Federal Reporting system does not pro-rate activity requirements in months when an individual begins or exits TANF. Consequently, an individual may begin a full-time work activity in the middle of a month while having, for Federal Reporting purposes, a full month of work requirement hours. Holidays which are not allowed for TANF may close a work site or educational facility, causing a deficit of hours for the month. In addition, Tennessee allows some individuals to operate under a modified work plan with fewer hours.

Job search/job readiness assistance and vocational educational training accounted for nearly 21.6 percent and 7.9 percent of total insufficient hours of participation in countable work activities, respectively, reflecting the often part-time nature of these activities. It also highlights that while some States are strategic about whether they report hours in these activities (i.e., they report hours in time-limited activities only when the WEI has sufficient hours to be counted toward the State's Federal work participation rate), for many States this is apparently not a factor. Indeed, all States reported at least some individuals in these categories, even though doing so did not help their participation rate and would count against the individual's limited hours (job search/job readiness assistance) or months (vocational education training) of countability.

Table 9. Average Monthly Total Number of Insufficient Countable Hours of Participation By Activity, by State: Apr-Jun, 2011

STATE	WEIs with Insufficient Hours of Participation	Unsubsidized Employment	Job Search/Job Readiness Assistance	Vocational Educational Training	Education Directly Related to Employment	Work Experience	Community Service	Job Skills Training	Satisfactory School Attendance	Subsidized Private Employment	Subsidized Public Employment	On-The-Job Training	Providing Child Care to a Participant in a Community Service Program	Total Insufficient Hours in Countable Work Activities	Average Insufficient, Countable Hours Per WEI With Insufficient Hours
UNITED STATES	193,935	4,567,981	2,271,663	825,474	672,322	661,590	553,287	500,355	217,520	142,089	101,762	504	18	10,514,565	54.2
ALABAMA	1,487	68,788	7,793	2,091	0	18,122	0	601	3,488	0	1,783	0	0	102,666	69.0
ALASKA	567	7,819	7,751	958	0	0	6,963	0	0	0	0	0	0	23,491	41.4
ARIZONA	1,296	3,999	3,253	2,701	247	2,299	1,940	1,245	756	0	0	72	0	16,512	12.7
ARKANSAS	678	1,514	1,935	3,536	0	1,410	66	164	92	0	0	7	0	8,724	12.9
CALIFORNIA	73,807	1,805,210	1,077,616	222,069	586,960	130,608	158,144	139,674	34,446	78,321	89,042	0	0	4,322,090	58.6
COLORADO	1,335	18,795	8,711	15,400	1,340	17,793	3,974	428	9,575	1,474	0	143	0	77,633	58.2
CONNECTICUT	1,586	26,364	75,779	3,932	1,928	0	22	0	0	0	0	0	0	108,025	68.1
DELAWARE	287	9,554	132	22	618	5,854	0	0	0	0	0	0	0	16,180	56.4
DIST. OF COL.	133	1,216	0	0	0	49	0	0	367	0	0	0	0	1,632	12.3
FLORIDA	1,395	24,064	1,383	413	663	21,800	27,313	20,134	6,384	254	0	0	0	102,408	73.4
GEORGIA	775	7,187	9,571	0	0	3,833	0	120	3,230	0	0	0	0	23,941	30.9
GUAM	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
HAWAII	1,043	12,516	509	325	47	875	306	114	12	274	43	0	0	15,021	14.4
IDAHO	52	532	1,654	173	0	288	0	2	77	0	0	0	0	2,726	52.4
ILLINOIS	2,183	6,291	2,074	1,279	480	15,054	2,756	88	0	0	0	0	0	28,022	12.8
INDIANA	3,309	95,541	31,257	9,220	1,000	8,874	83	1,547	5,417	1,050	0	43	0	154,032	46.5
IOWA	3,607	65,125	42,980	27,170	1,288	1,700	4,390	1,193	0	0	0	0	0	143,846	39.9
KANSAS	3,174	86,951	29,703	19,121	4,039	4,322	0	2,817	8,109	0	0	0	0	155,062	48.9
KENTUCKY	1,239	29,791	1,130	6,956	4,369	12,232	16,825	5,464	0	466	0	0	0	77,233	62.3
LOUISIANA	495	8,580	3,458	5,764	609	4,006	3,183	400	1,939	33	40	0	0	28,012	56.6
MAINE	2,865	34,830	2,450	0	5,714	411	4,947	0	643	0	0	0	0	48,995	17.1
MARYLAND	1,537	34,307	6,864	3,019	14	33,111	14,917	12,887	5,746	0	0	0	0	110,865	72.1
MASSACHUSETTS	1,815	61,307	31,021	7,810	9,379	0	0	0	2,398	0	0	0	0	111,915	61.7
MICHIGAN	10,042	294,404	149,562	31,808	0	24,710	45,278	1,963	0	0	0	0	0	547,725	54.5
MINNESOTA	3,638	124,356	42,689	3,793	0	5,757	1,182	10,914	7,258	0	0	0	0	195,949	53.9
MISSISSIPPI	752	6,959	1,954	4,546	3,025	3,744	15,500	0	0	0	0	0	0	35,728	47.5
MISSOURI	2,358	48,155	33,963	17,878	0	4,407	7,057	0	235	0	3,118	0	0	114,813	48.7
MONTANA	790	13,186	8,527	5,239	137	26,272	5,862	405	431	0	825	0	0	60,884	77.1
NEBRASKA	397	13,487	1,277	176	28	5,994	3,287	0	0	0	0	0	0	24,249	61.1
NEVADA	998	29,058	4,230	6,503	0	5,912	17,881	0	399	716	693	0	0	65,392	65.5
NEW HAMPSHIRE	220	4,785	341	0	0	465	2,363	1,123	147	0	0	0	0	9,224	41.9
NEW JERSEY	2,775	12,732	0	0	0	12,689	0	2,402	0	0	0	0	0	27,823	10.0
NEW MEXICO	1,254	29,430	13,684	6,421	1,657	16,662	6,829	14,041	776	0	0	0	0	89,500	71.4
NEW YORK	17,722	591,312	222,797	80,577	16,423	129,207	6,859	56,748	51,839	2,354	0	0	0	1,158,116	65.3
NORTH CAROLINA	871	12,178	37,973	2,418	0	9,311	521	645	0	2,069	0	0	0	65,115	74.8
NORTH DAKOTA	172	4,797	204	325	519	3,870	48	18	37	0	39	0	0	9,857	57.3
OHIO	6,981	53,517	10,431	11,111	320	16,362	3,337	0	586	0	959	0	0	96,623	13.8
OKLAHOMA	656	3,183	11,416	11,899	0	5,857	2,082	0	0	0	0	0	0	34,437	52.5
OREGON	4,599	221,043	31,147	15,276	2,925	57,076	0	2,470	3,966	0	0	0	0	333,903	72.6
PENNSYLVANIA	4,757	104,102	11,885	78,033	8,560	0	45,225	25,597	4,221	824	3,751	0	0	282,198	59.3
PUERTO RICO	282	462	235	1,160	0	424	2,121	0	0	116	0	0	0	4,518	16.0
RHODE ISLAND	959	25,069	19,748	5,166	12	1,794	0	0	0	0	0	0	0	51,789	54.0
SOUTH CAROLINA	1,822	31,227	23,942	8,654	0	15,175	1,631	0	222	0	0	0	0	80,851	44.4
SOUTH DAKOTA	272	1,528	373	519	3,146	0	6,955	0	0	0	651	0	0	13,172	48.4
TENNESSEE	10,404	337,729	119,167	155,592	13,061	14,580	103,092	69,704	0	0	33	0	0	812,958	78.1
TEXAS	655	6,400	3,982	0	0	0	1,197	0	0	0	0	0	0	11,579	17.7
UTAH	744	10,789	0	2,383	0	4,893	2,973	6,393	2,563	317	53	75	0	30,439	40.9
VERMONT	263	2,410	176	48	18	92	374	18	18	0	0	0	18	3,172	12.1
VIRGIN ISLANDS	25	0	21	2,394	0	2,141	0	80	0	1,072	0	0	0	5,708	228.3
VIRGINIA	1,901	54,261	0	8,575	0	0	21,029	12,430	25,281	0	0	0	0	121,576	64.0
WASHINGTON	9,170	113,599	164,981	24,046	1,287	5,227	3,245	108,252	28,866	52,285	169	151	0	502,108	54.8
WEST VIRGINIA	637	6,091	9,821	8,975	1,162	1,028	1,530	68	6,498	464	563	0	0	36,200	56.8
WISCONSIN	3,147	1,374	0	0	1,340	5,097	0	206	1,498	0	0	0	0	9,515	3.0
WYOMING	7	77	113	0	7	203	0	0	0	0	0	13	0	413	59.0

NR = Not reported.

Table 10. Percent of Total Insufficient Countable Hours of Participation By Activity, by State: Apr-Jun, 2011

STATE	WEIs with Insufficient Hours of Participation	Unsubsidized Employment	Job Search/Job Readiness Assistance	Vocational Educational Training	Education Directly Related to Employment	Work Experience	Community Service	Job Skills Training	Satisfactory School Attendance	Subsidized Private Employment	Subsidized Public Employment	On-The-Job Training	Providing Child Care to a Participant in a Community Service Program	Total Insufficient Hours in Countable Work Activities
UNITED STATES	193,935	43.4%	21.6%	7.9%	6.4%	6.3%	5.3%	4.8%	2.1%	1.4%	1.0%	0.0%	0.0%	10,514,565
ALABAMA	1,487	67.0%	7.6%	2.0%	0.0%	17.7%	0.0%	0.6%	3.4%	0.0%	1.7%	0.0%	0.0%	102,666
ALASKA	567	33.3%	33.0%	4.1%	0.0%	0.0%	29.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	23,491
ARIZONA	1,296	24.2%	19.7%	16.4%	1.5%	13.9%	11.7%	7.5%	4.6%	0.0%	0.0%	0.4%	0.0%	16,512
ARKANSAS	678	17.4%	22.2%	40.5%	0.0%	16.2%	0.8%	1.9%	1.1%	0.0%	0.0%	0.1%	0.0%	8,724
CALIFORNIA	73,807	41.8%	24.9%	5.1%	13.6%	3.0%	3.7%	3.2%	0.8%	1.8%	2.1%	0.0%	0.0%	4,322,090
COLORADO	1,335	24.2%	11.2%	19.8%	1.7%	22.9%	5.1%	0.6%	12.3%	1.9%	0.0%	0.2%	0.0%	77,633
CONNECTICUT	1,586	24.4%	70.1%	3.6%	1.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	108,025
DELAWARE	287	59.0%	0.8%	0.1%	3.8%	36.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	16,180
DIST. OF COL.	133	74.5%	0.0%	0.0%	0.0%	3.0%	0.0%	0.0%	22.5%	0.0%	0.0%	0.0%	0.0%	1,632
FLORIDA	1,395	23.5%	1.4%	0.4%	0.6%	21.3%	26.7%	19.7%	6.2%	0.2%	0.0%	0.0%	0.0%	102,408
GEORGIA	775	30.0%	40.0%	0.0%	0.0%	16.0%	0.0%	0.5%	13.5%	0.0%	0.0%	0.0%	0.0%	23,941
GUAM	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
HAWAII	1,043	83.3%	3.4%	2.2%	0.3%	5.8%	2.0%	0.8%	0.1%	1.8%	0.3%	0.0%	0.0%	15,021
IDAHO	52	19.5%	60.7%	6.3%	0.0%	10.6%	0.0%	0.1%	2.8%	0.0%	0.0%	0.0%	0.0%	2,726
ILLINOIS	2,183	22.5%	7.4%	4.6%	1.7%	53.7%	9.8%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	28,022
INDIANA	3,309	62.0%	20.3%	6.0%	0.6%	5.8%	0.1%	1.0%	3.5%	0.7%	0.0%	0.0%	0.0%	154,032
IOWA	3,607	45.3%	29.9%	18.9%	0.9%	1.2%	3.1%	0.8%	0.0%	0.0%	0.0%	0.0%	0.0%	143,846
KANSAS	3,174	56.1%	19.2%	12.3%	2.6%	2.8%	0.0%	1.8%	5.2%	0.0%	0.0%	0.0%	0.0%	155,062
KENTUCKY	1,239	38.6%	1.5%	9.0%	5.7%	15.8%	21.8%	7.1%	0.0%	0.6%	0.0%	0.0%	0.0%	77,233
LOUISIANA	495	30.6%	12.3%	20.6%	2.2%	14.3%	11.4%	1.4%	6.9%	0.1%	0.1%	0.0%	0.0%	28,012
MAINE	2,865	71.1%	5.0%	0.0%	11.7%	0.8%	10.1%	0.0%	1.3%	0.0%	0.0%	0.0%	0.0%	48,995
MARYLAND	1,537	30.9%	6.2%	2.7%	0.0%	29.9%	13.5%	11.6%	5.2%	0.0%	0.0%	0.0%	0.0%	110,865
MASSACHUSETTS	1,815	54.8%	27.7%	7.0%	8.4%	0.0%	0.0%	0.0%	2.1%	0.0%	0.0%	0.0%	0.0%	111,915
MICHIGAN	10,042	53.8%	27.3%	5.8%	0.0%	4.5%	8.3%	0.4%	0.0%	0.0%	0.0%	0.0%	0.0%	547,725
MINNESOTA	3,638	63.5%	21.8%	1.9%	0.0%	2.9%	0.6%	5.6%	3.7%	0.0%	0.0%	0.0%	0.0%	195,949
MISSISSIPPI	752	19.5%	5.5%	12.7%	8.5%	10.5%	43.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	35,728
MISSOURI	2,358	41.9%	29.6%	15.6%	0.0%	3.8%	6.1%	0.0%	0.2%	0.0%	2.7%	0.0%	0.0%	114,813
MONTANA	790	21.7%	14.0%	8.6%	0.2%	43.2%	9.6%	0.7%	0.7%	0.0%	1.4%	0.0%	0.0%	60,884
NEBRASKA	397	55.6%	5.3%	0.7%	0.1%	24.7%	13.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	24,249
NEVADA	998	44.4%	6.5%	9.9%	0.0%	9.0%	27.3%	0.0%	0.6%	1.1%	1.1%	0.0%	0.0%	65,392
NEW HAMPSHIRE	220	51.9%	3.7%	0.0%	0.0%	5.0%	25.6%	12.2%	1.6%	0.0%	0.0%	0.0%	0.0%	9,224
NEW JERSEY	2,775	45.8%	0.0%	0.0%	0.0%	45.6%	0.0%	8.6%	0.0%	0.0%	0.0%	0.0%	0.0%	27,823
NEW MEXICO	1,254	32.9%	15.3%	7.2%	1.9%	18.6%	7.6%	15.7%	0.9%	0.0%	0.0%	0.0%	0.0%	89,500
NEW YORK	17,722	51.1%	19.2%	7.0%	1.4%	11.2%	0.6%	4.9%	4.5%	0.2%	0.0%	0.0%	0.0%	1,158,116
NORTH CAROLINA	871	18.7%	58.3%	3.7%	0.0%	14.3%	0.8%	1.0%	0.0%	3.2%	0.0%	0.0%	0.0%	65,115
NORTH DAKOTA	172	48.7%	2.1%	3.3%	5.3%	39.3%	0.5%	0.2%	0.4%	0.0%	0.4%	0.0%	0.0%	9,857
OHIO	6,981	55.4%	10.8%	11.5%	0.3%	16.9%	3.5%	0.0%	0.6%	0.0%	1.0%	0.0%	0.0%	96,623
OKLAHOMA	656	9.2%	33.2%	34.6%	0.0%	17.0%	6.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	34,437
OREGON	4,599	66.2%	9.3%	4.6%	0.9%	17.1%	0.0%	0.7%	1.2%	0.0%	0.0%	0.0%	0.0%	333,903
PENNSYLVANIA	4,757	36.9%	4.2%	27.7%	3.0%	0.0%	16.0%	9.1%	1.5%	0.3%	1.3%	0.0%	0.0%	282,198
PUERTO RICO	282	10.2%	5.2%	25.7%	0.0%	9.4%	46.9%	0.0%	0.0%	2.6%	0.0%	0.0%	0.0%	4,518
RHODE ISLAND	959	48.4%	38.1%	10.0%	0.0%	3.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	51,789
SOUTH CAROLINA	1,822	38.6%	29.6%	10.7%	0.0%	18.8%	2.0%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	80,851
SOUTH DAKOTA	272	11.6%	2.8%	3.9%	23.9%	0.0%	52.8%	0.0%	0.0%	0.0%	4.9%	0.0%	0.0%	13,172
TENNESSEE	10,404	41.5%	14.7%	19.1%	1.6%	1.8%	12.7%	8.6%	0.0%	0.0%	0.0%	0.0%	0.0%	812,958
TEXAS	655	55.3%	34.4%	0.0%	0.0%	0.0%	10.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	11,579
UTAH	744	35.4%	0.0%	7.8%	0.0%	16.1%	9.8%	21.0%	8.4%	1.0%	0.2%	0.2%	0.0%	30,439
VERMONT	263	76.0%	5.5%	1.5%	0.6%	2.9%	11.8%	0.6%	0.6%	0.0%	0.0%	0.0%	0.6%	3,172
VIRGIN ISLANDS	25	0.0%	0.4%	41.9%	0.0%	37.5%	0.0%	1.4%	0.0%	18.8%	0.0%	0.0%	0.0%	5,708
VIRGINIA	1,901	44.6%	0.0%	7.1%	0.0%	0.0%	17.3%	10.2%	20.8%	0.0%	0.0%	0.0%	0.0%	121,576
WASHINGTON	9,170	22.6%	32.9%	4.8%	0.3%	1.0%	0.6%	21.6%	5.7%	10.4%	0.0%	0.0%	0.0%	502,108
WEST VIRGINIA	637	16.8%	27.1%	24.8%	3.2%	2.8%	4.2%	0.2%	18.0%	1.3%	1.6%	0.0%	0.0%	36,200
WISCONSIN	3,147	14.4%	0.0%	0.0%	14.1%	53.6%	0.0%	2.2%	15.7%	0.0%	0.0%	0.0%	0.0%	9,515
WYOMING	7	18.6%	27.4%	0.0%	1.7%	49.2%	0.0%	0.0%	0.0%	0.0%	0.0%	3.1%	0.0%	413

NR = Not reported.

WEIs with Hours in Non-Countable Activities

As described above, the law specifies the activities that count toward the participation rates, and imposes certain restrictions on when activities can count. Yet many States have indicated that they engage WEIs in a many other activities that they are not currently able to count toward the work participation rate, but that nevertheless move the family toward self-sufficiency. In addition, an individual may be in a self-initiated activity, e.g., an education program, that does not count toward the participation rate requirements, but that may help the individual move toward self-sufficiency.

Non-countable engagement activities that promote self-sufficiency include a variety of activities that cannot generally be counted as “core” activities: obtaining a high school diploma or GED; adult basic education/English as a Second Language¹²; post-secondary education; treatment activities (e.g., physical or mental health services, substance abuse treatment, domestic violence services, attending to physical or mental health disabilities or conditions); family life skills activities (e.g., teen parent skill-building, parenting programs, mentoring, personal development activities, organizations skills workshops, and financial literacy/budgeting workshops); accessing work support activities (e.g., finding and arranging childcare, obtaining a driver’s license); and in assessment (i.e., the process of identifying a WEI’s skills, goals, needs, and any barriers to employment).

Table 11 summarizes the average monthly total number of hours of participation in non-countable activities that move families toward self-sufficiency by the type of activity in which the WEI was engaged. Thirty-three States reported an average monthly total of 62,460 WEIs (5.1 percent of WEIs) with hours of participation in non-countable activities that move families toward self-sufficiency.

California reported the largest number of WEIs with non-countable hours (12,899 WEIs, or 3.0 percent of the State’s WEIs). Alaska reported the highest percentage of its State’s WEIs as

¹² Basic education and English as a Second Language are not stand-alone core activities under the TANF statute, but they can count under vocational educational training, if they are a necessary and regular part of the work activity; they also can count under education directly related to employment (a non-core activity). Furthermore, a State may count up to one year of post-secondary education as vocational education training.

having hours in non-countable activities that move a family toward self-sufficiency (53.7 percent). (See Table 5 for percentages.)

Again, it is likely that some of the differences among States stem from differences in the extent to which such activities are tracked effectively.

The total average monthly number of hours of participation in non-countable activities that move families toward self-sufficiency reported by States was 1,898,110. Table 12 shows percentages of the total number of hours of participation in non-countable activities. Three activities accounted for over 60 percent of the hours spent in these activities:

- 23.9 percent were in adult basic education;
- 18.6 percent were in treatment activities; and
- 18.0 percent were in family life skills activities.

States also were able to list other types of non-countable activities in which they are engaging families in order to move them toward self-sufficiency. Other activities frequently listed included “working on a family issue;” extended care of a family member; attending jury duty or a court date; conducting a housing search; completing court mandated activities, e.g., probation or child welfare; receiving intensive in-home services or case management; going to doctor appointments; providing child care; and obtaining a medical evaluation.

When specifying other non-countable activities, States also listed uncountable job search/job readiness assistance and vocational educational training as an uncountable activity that moves a family toward self-sufficiency; thus, there may be some inconsistencies in reporting between States as it is possible that many States only reported these hours as “hours of participation beyond the statutory limit,” and not also as “hours of participation in non-countable activities that move the family toward self-sufficiency.”

These data may understate the number of WEIs with participation in non-countable activities, because States and/or their vendors typically do not collect information about such activities and there is little incentive to invest resources in doing so. Officials in one State observed:

The new requirement for States to record hours of non-countable activities that move the family toward self-sufficiency have been documented by [this State], 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 ... Field staff, the State does not have coding system or structured report that captures this data, so [this State] will not be able to report those hours to the [HHS].

[This State] 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.

Table 11. Average Monthly Total Number of Hours of Participation in Non-Countable Activities that Move the Family toward Self-Sufficiency By Activity, by State: Apr-Jun, 2011

STATE	WEIs with Hours of Participation in Non-Countable Activities That Move a Family Toward Self-Sufficiency	Adult Basic Education	Treatment Activities	Family Life Skills Activities	High School or GED	Other	Post-Secondary Education	In Assessment	Accessing Work Support Activities	Total Hours in Non-Countable Activities That Move a Family Toward Self-Sufficiency	Average Hours of Participation in Activities That Move a Family Toward Self-Sufficiency
UNITED STATES	62,460	452,987	352,962	340,807	234,736	191,963	154,631	111,965	58,059	1,898,110	30.4
ALABAMA	244	0	0	0	0	13,977	0	0	0	13,977	57.3
ALASKA	1,693	0	0	83	440	1,672	0	0	0	2,195	1.3
ARIZONA	1,183	361	77	2,213	1,375	23,274	0	63	20	27,383	23.1
ARKANSAS	31	0	0	0	0	0	752	0	0	752	24.3
CALIFORNIA	12,899	386,153	113,304	0	0	984	137,242	0	0	637,683	49.4
COLORADO	424	1,197	848	21	9,417	0	0	459	86	12,028	28.4
CONNECTICUT	444	0	0	0	0	0	0	1,652	1,841	3,493	7.9
DELAWARE	9	0	0	0	0	262	0	0	0	262	29.1
DIST. OF COL.	0	0	0	0	0	0	0	0	0	0	0.0
FLORIDA	1,749	5,506	0	0	0	0	0	6,697	526	12,729	7.3
GEORGIA	26	0	787	0	0	2,331	0	0	0	3,118	119.9
GUAM	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
HAWAII	42	0	27	0	0	0	68	76	0	171	4.1
IDAHO	77	0	37	4	0	7,926	0	0	0	7,967	103.5
ILLINOIS	42	0	42	0	0	0	0	0	0	42	1.0
INDIANA	0	0	0	0	0	0	0	0	0	0	0.0
IOWA	210	0	0	1,890	0	0	0	0	0	1,890	9.0
KANSAS	1,766	553	34,287	2,055	0	0	0	1,286	0	38,181	21.6
KENTUCKY	133	430	5,326	0	0	0	0	0	0	5,756	43.3
LOUISIANA	545	0	2,580	746	229	1,081	0	447	182	5,265	9.7
MAINE	16	207	0	0	15	0	0	5	0	227	14.2
MARYLAND	351	0	5,136	0	6,388	0	0	0	164	11,688	33.3
MASSACHUSETTS	1,144	0	0	0	10,208	104,053	0	0	0	114,261	99.9
MICHIGAN	99	0	0	0	1,978	0	0	0	0	1,978	20.0
MINNESOTA	1,787	0	9,114	0	0	520	0	8,724	3,898	22,256	12.5
MISSISSIPPI	0	0	0	0	0	0	0	0	0	0	0.0
MISSOURI	52	3,751	0	0	0	0	0	0	0	3,751	72.1
MONTANA	240	0	4,080	5,947	0	0	0	0	0	10,027	41.8
NEBRASKA	13	468	0	0	0	0	223	0	0	691	53.2
NEVADA	963	3,738	2,314	88	3,856	601	293	871	92	11,853	12.3
NEW HAMPSHIRE	3	0	11	0	0	0	0	0	115	126	42.0
NEW JERSEY	0	0	0	0	0	0	0	0	0	0	0.0
NEW MEXICO	0	0	0	0	0	0	0	0	0	0	0.0
NEW YORK	11,596	0	5,825	913	160,819	33,471	0	65,638	1,331	267,997	23.1
NORTH CAROLINA	1,382	228	3,304	0	4,831	0	3,163	843	18,491	30,860	22.3
NORTH DAKOTA	2	28	0	7	14	2	0	0	0	51	25.5
OHIO	1,288	0	5,294	0	0	0	0	0	0	5,294	4.1
OKLAHOMA	365	29,703	0	0	0	0	0	0	0	29,703	81.4
OREGON	2,298	602	825	22,045	991	0	0	0	0	24,463	10.6
PENNSYLVANIA	6,119	6,998	71,244	82,462	25,015	700	12,855	607	707	200,588	32.8
PUERTO RICO	0	0	0	0	0	0	0	0	0	0	0.0
RHODE ISLAND	0	0	0	0	1	0	0	0	0	1	0.0
SOUTH CAROLINA	0	0	0	0	0	0	0	0	0	0	0.0
SOUTH DAKOTA	0	0	0	0	0	0	0	0	0	0	0.0
TENNESSEE	0	0	0	0	0	0	0	0	0	0	0.0
TEXAS	0	0	0	0	0	0	0	0	0	0	0.0
UTAH	1,010	3,887	34,143	2,023	9,159	0	0	18,473	2,533	70,218	69.5
VERMONT	395	118	781	243	0	41	35	82	374	1,674	4.2
VIRGIN ISLANDS	0	0	0	0	0	0	0	0	0	0	0.0
VIRGINIA	162	0	0	0	0	0	0	0	18,348	18,348	113.3
WASHINGTON	7,255	9,059	29,286	215,644	0	3	0	5,988	5,372	265,352	36.6
WEST VIRGINIA	249	0	0	0	0	1,044	0	54	2,654	3,752	15.1
WISCONSIN	4,142	0	22,477	4,343	0	21	0	0	1,325	28,166	6.8
WYOMING	12	0	1,813	80	0	0	0	0	0	1,893	157.8

NR = Not reported.

Table 12. Percent of Total Number of Hours of Participation in Non-Countable Activities that Move the Family toward Self-Sufficiency By Activity, by State: Apr-Jun, 2011

STATE	WEIs with Hours of Participation in Non-Countable Activities That Move a Family Toward Self-Sufficiency	Adult Basic Education	Treatment Activities	Family Life Skills Activities	High School or GED	Other	Post-Secondary Education	In Assessment	Accessing Work Support Activities	Total Hours in Non-Countable Activities That Move a Family Toward Self-Sufficiency
UNITED STATES	62,460	23.9%	18.6%	18.0%	12.4%	10.1%	8.1%	5.9%	3.1%	1,898,110
ALABAMA	244	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	0.0%	13,977
ALASKA	1,693	0.0%	0.0%	3.8%	20.0%	76.2%	0.0%	0.0%	0.0%	2,195
ARIZONA	1,183	1.3%	0.3%	8.1%	5.0%	85.0%	0.0%	0.2%	0.1%	27,383
ARKANSAS	31	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	752
CALIFORNIA	12,899	60.6%	17.8%	0.0%	0.0%	0.2%	21.5%	0.0%	0.0%	637,683
COLORADO	424	10.0%	7.1%	0.2%	78.3%	0.0%	0.0%	3.8%	0.7%	12,028
CONNECTICUT	444	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	47.3%	52.7%	3,493
DELAWARE	9	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	0.0%	262
DIST. OF COL.	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
FLORIDA	1,749	43.3%	0.0%	0.0%	0.0%	0.0%	0.0%	52.6%	4.1%	12,729
GEORGIA	26	0.0%	25.2%	0.0%	0.0%	74.8%	0.0%	0.0%	0.0%	3,118
GUAM	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
HAWAII	42	0.0%	15.8%	0.0%	0.0%	0.0%	39.8%	44.4%	0.0%	171
IDAHO	77	0.0%	0.5%	0.1%	0.0%	99.5%	0.0%	0.0%	0.0%	7,967
ILLINOIS	42	0.0%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	42
INDIANA	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
IOWA	210	0.0%	0.0%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1,890
KANSAS	1,766	1.4%	89.8%	5.4%	0.0%	0.0%	0.0%	3.4%	0.0%	38,181
KENTUCKY	133	7.5%	92.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	5,756
LOUISIANA	545	0.0%	49.0%	14.2%	4.3%	20.5%	0.0%	8.5%	3.5%	5,265
MAINE	16	91.2%	0.0%	0.0%	6.6%	0.0%	0.0%	2.2%	0.0%	227
MARYLAND	351	0.0%	43.9%	0.0%	54.7%	0.0%	0.0%	0.0%	1.4%	11,688
MASSACHUSETTS	1,144	0.0%	0.0%	0.0%	8.9%	91.1%	0.0%	0.0%	0.0%	114,261
MICHIGAN	99	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	0.0%	0.0%	1,978
MINNESOTA	1,787	0.0%	41.0%	0.0%	0.0%	2.3%	0.0%	39.2%	17.5%	22,256
MISSISSIPPI	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
MISSOURI	52	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	3,751
MONTANA	240	0.0%	40.7%	59.3%	0.0%	0.0%	0.0%	0.0%	0.0%	10,027
NEBRASKA	13	67.7%	0.0%	0.0%	0.0%	0.0%	32.3%	0.0%	0.0%	691
NEVADA	963	31.5%	19.5%	0.7%	32.5%	5.1%	2.5%	7.3%	0.8%	11,853
NEW HAMPSHIRE	3	0.0%	8.7%	0.0%	0.0%	0.0%	0.0%	0.0%	91.3%	126
NEW JERSEY	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
NEW MEXICO	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
NEW YORK	11,596	0.0%	2.2%	0.3%	60.0%	12.5%	0.0%	24.5%	0.5%	267,997
NORTH CAROLINA	1,382	0.7%	10.7%	0.0%	15.7%	0.0%	10.2%	2.7%	59.9%	30,860
NORTH DAKOTA	2	54.9%	0.0%	13.7%	27.5%	3.9%	0.0%	0.0%	0.0%	51
OHIO	1,288	0.0%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	5,294
OKLAHOMA	365	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	29,703
OREGON	2,298	2.5%	3.4%	90.1%	4.1%	0.0%	0.0%	0.0%	0.0%	24,463
PENNSYLVANIA	6,119	3.5%	35.5%	41.1%	12.5%	0.3%	6.4%	0.3%	0.4%	200,588
PUERTO RICO	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
RHODE ISLAND	0	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	0.0%	0.0%	1
SOUTH CAROLINA	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
SOUTH DAKOTA	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
TENNESSEE	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
TEXAS	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
UTAH	1,010	5.5%	48.6%	2.9%	13.0%	0.0%	0.0%	26.3%	3.6%	70,218
VERMONT	395	7.0%	46.7%	14.5%	0.0%	2.4%	2.1%	4.9%	22.3%	1,674
VIRGIN ISLANDS	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
VIRGINIA	162	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%	18,348
WASHINGTON	7,255	3.4%	11.0%	81.3%	0.0%	0.0%	0.0%	2.3%	2.0%	265,352
WEST VIRGINIA	249	0.0%	0.0%	0.0%	0.0%	27.8%	0.0%	1.4%	70.7%	3,752
WISCONSIN	4,142	0.0%	79.8%	15.4%	0.0%	0.1%	0.0%	0.0%	4.7%	28,166
WYOMING	12	0.0%	95.8%	4.2%	0.0%	0.0%	0.0%	0.0%	0.0%	1,893

NR = Not reported.

WEIs with Hours that Do Not Meet Verification Standards

In order for an hour of participation in a work activity to count towards meeting an individual's work requirements, it must be verified.

Under the original TANF law and implementing regulations, HHS chose not to define the 12 statutory work activities but instead provided program design flexibility to States. Similarly, there were few guidelines on many other aspects of the work participation rate calculation, including the counting and verification of hours of participation.

The DRA required each State to establish and maintain work participation verification procedures through a Work Verification Plan. Accordingly, with the publication of the final rule on February 5, 2008, each State was required to: (1) determine which work activities may count for participation rate purposes; (2) determine how to count and verify reported hours of work; and (3) identify who is a WEI. The State also must develop and use internal controls to ensure compliance with its procedures and submit them in a complete Work Verification Plan to the Secretary for approval. The purpose of the Work Verification Plan is to ensure that States report participation data that is consistent with the law and regulations and that States adequately verify the accuracy of that participation data.

Table 13 summarizes the average monthly total number of hours of reported participation that did not meet verification standards, broken down by countable work activity (see Appendix III for definitions of work activities). Nationally, 25 States reported WEIs with unverified hours, with 35,627 average monthly WEIs (2.6 percent of WEIs) reporting 2,709,932 unverified hours. Note that unverified hours are not counted in this report when determining whether or not a WEI met the Federal participation rate standards (though some of the WEIs reported here may end up being counted towards the work participation rates because States have more time to verify the hours reported here).

Washington State reported the largest average monthly number of WEIs with hours that do not meet verification standards (8,409 WEIs, or 19.5 percent of the State's WEIs). (See Table 5 for percentages.)

States have often asserted that aspects of the existing verification requirements are onerous and lead to uncounted hours of participation. Several examples from the State engagement reports convey these concerns. Alabama stated in its engagement report that "...a client is not countable in the work participation rate until after the first pay check is received by the client and submitted to [Department of Human Resources]. In some cases this is as long as one month after employment starts. During this time, the individual is not countable even though s/he is participating sufficient hours to meet the federal requirements." Alaska similarly illustrated the difficulty in verifying hours of participation in its engagement report by describing the following situation: "A parent receiving TANF gets a new job. Unsubsidized Employment meets the definition of a countable activity. However, if the Division of Public Assistance and/or its Work Services (case management) Provider have not yet received collateral verification from the employer or its representative documenting the number of hours the parent has worked or has been hired to work per week, then the activity is not verified as per regulation."

The data submitted in response to the Claims Resolution Act requirements may understate the number of States and WEIs with unverified hours of participation, because States and/or their vendors typically do not collect information about non-verified hours of participation and there is little incentive to invest resources in doing so. Iowa stated that it "collects only hours that can be verified according to federal standards; therefore this section... is reported as zero." Similarly, in its report, one State explained, "We also did not report hours that were not verified per federal standards... [U]nverified hours are not reconciled on our existing computer system...We were unable to expend resources to make changes to the existing computer system to capture this information in the timeframes provided for the report." Indeed, there are likely circumstances in all States that preclude verifying all hours of participation, yet 27 States did not report any individuals with unverified hours of participation.

On the other hand, the number of unverified hours may be artificially overstated in comparison to the regular TANF data reporting because of the very short timeframe imposed on them by the Claims Resolution Act; several States reported difficulties in verifying all the hours by the established timeframe for the ACF-812. One State expressed in its engagement report that "while the timeframe for completing the ACF-812 was very short and it is possible some of the

required documentation will eventually be obtained, the number of hours reported in this category speaks to the high level of difficulty states have in meeting the current federally mandated documentation requirements. States expend a high level of resources to try to obtain the very difficult level of verification required federally and often to no avail.” Similarly, another State described how the short time frame allowed for data collection compounded what they see as burdensome verification requirements; it stated, “due to the abbreviated reporting time frame for collection of the April-June 2011 data sample, it was particularly challenging to verify participation, as it limited the opportunity for counties to recall and resubmit data. Additionally, the onerous nature of the current standards prevents verification from being achieved even when additional time to report is allowed.” This State believes that the large number of unverified hours demonstrates the need to reexamine the federal verification standards.

Table 13. Average Monthly Total Number of Hours of Participation That Do Not Meet the Verification Standards by Activity, by State: Apr-Jun, 2011

STATE	WEIs with Hours of Participation That Do Not Meet the Verification Standards	Unsubsidized Employment	Vocational Educational Training	Job Search/Job Readiness Assistance	Subsidized Private Employment	Community Service	Satisfactory School Attendance	Education Directly Related to Employment	Work Experience	Job Skills Training	Subsidized Public Employment	On-The-Job Training	Providing Child Care to a Participant in a Community Service Program	Total Hours in Countable Activities That Do Not Meet the Verification Standard	Average Non-Verified Hours of Participation Per WEI with Non-Verified Hours
UNITED STATES	32,627	988,050	534,003	467,670	255,964	169,191	110,452	100,285	32,168	28,293	9,444	7,562	2,850	2,705,932	82.9
ALABAMA	296	29,608	0	0	0	0	0	0	0	0	0	0	0	29,608	100.0
ALASKA	16	840	407	764	0	0	0	0	0	0	0	0	0	2,011	125.7
ARIZONA	36	588	492	897	0	451	0	9	109	3	0	0	0	2,549	70.8
ARKANSAS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
CALIFORNIA	7,856	85,056	238,174	223,679	0	93,006	36,563	34,446	0	0	0	0	0	710,924	90.5
COLORADO	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
CONNECTICUT	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
DELAWARE	182	2,713	3,512	985	0	0	1,415	0	1,494	0	0	0	0	10,119	55.6
DIST. OF COL.	146	4,140	705	1,132	0	0	0	0	940	0	0	0	0	6,917	47.4
FLORIDA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
GEORGIA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
GUAM	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
HAWAII	19	41	16	20	13	19	0	2	31	6	0	0	0	148	7.8
IDAHO	37	80	30	511	0	0	37	0	1	0	0	0	0	659	17.8
ILLINOIS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
INDIANA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
IOWA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
KANSAS	311	0	5,567	5,773	0	0	1,944	31	0	0	0	0	0	13,315	42.8
KENTUCKY	667	8,501	13,735	2,347	491	22,989	1,315	1,606	15,566	1,151	0	0	0	67,701	101.5
LOUISIANA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
MAINE	3,345	3,579	1,985	5,034	0	305	31	602	7	0	0	0	0	11,543	3.5
MARYLAND	51	4,313	0	1,793	0	0	0	0	1,078	0	0	0	0	7,184	140.9
MASSACHUSETTS	1,457	17,067	41,365	14,080	1,502	9,310	14,666	12,015	0	0	0	0	0	110,005	75.5
MICHIGAN	394	9,990	0	8,166	0	0	0	0	1,177	0	0	0	0	19,333	49.1
MINNESOTA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
MISSISSIPPI	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
MISSOURI	734	31,288	14,818	9,691	0	0	0	0	0	0	831	0	0	56,628	77.1
MONTANA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
NEBRASKA	25	1,245	220	0	0	0	0	0	747	0	0	0	0	2,212	88.5
NEVADA	242	12,825	4,951	2,681	0	586	0	0	0	0	0	0	0	21,043	87.0
NEW HAMPSHIRE	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
NEW JERSEY	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
NEW MEXICO	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
NEW YORK	4,035	68,363	36,336	35,875	0	0	4,667	51,032	1,196	0	0	5,776	0	203,245	50.4
NORTH CAROLINA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
NORTH DAKOTA	5	0	17	61	0	0	0	0	7	0	13	23	0	121	24.2
OHIO	413	80	6,157	0	0	1,757	0	0	0	0	0	0	0	7,994	19.4
OKLAHOMA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
OREGON	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
PENNSYLVANIA	3,542	76,489	78,965	40,747	23,543	31,855	9,137	0	2,528	3,656	9,431	0	213	276,564	78.1
PUERTO RICO	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
RHODE ISLAND	163	0	0	15,541	0	0	0	0	0	0	0	0	0	15,541	95.3
SOUTH CAROLINA	140	1,483	5,338	3,007	0	0	0	0	0	0	0	0	0	9,828	70.2
SOUTH DAKOTA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
TENNESSEE	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
TEXAS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
UTAH	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
VERMONT	25	498	318	328	0	257	11	0	0	0	0	0	0	1,412	56.5
VIRGIN ISLANDS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
VIRGINIA	81	5,251	0	6,170	0	0	0	0	0	0	0	0	0	11,421	141.0
WASHINGTON	8,409	624,012	80,895	88,388	230,415	8,656	40,666	542	7,287	23,477	0	932	2,637	1,107,907	131.8
WEST VIRGINIA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
WISCONSIN	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
WYOMING	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0

NR= Not reported.

Table 14. Percent of Total Number of Hours of Participation That Do Not Meet the Verification Standards By Activity, by State: Apr-Jun, 2011

STATE	WEIs with Hours of Participation That Do Not Meet the Verification Standards	Unsubsidized Employment	Vocational Educational Training	Job Search/Job Readiness Assistance	Subsidized Private Employment	Community Service	Satisfactory School Attendance	Education Directly Related to Employment	Work Experience	Job Skills Training	Subsidized Public Employment	On-The-Job Training	Providing Child Care to a Participant in a Community Service Program	Total Hours in Countable Activities That Do Not Meet the Verification Standard
UNITED STATES	32,627	36.5%	19.7%	17.3%	9.5%	6.3%	4.1%	3.7%	1.2%	1.0%	0.3%	0.3%	0.1%	2,705,932
ALABAMA	296	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	29,608
ALASKA	16	41.8%	20.2%	38.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2,011
ARIZONA	36	23.1%	19.3%	35.2%	0.0%	17.7%	0.0%	0.4%	4.3%	0.1%	0.0%	0.0%	0.0%	2,549
ARKANSAS	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
CALIFORNIA	7,856	12.0%	33.5%	31.5%	0.0%	13.1%	5.1%	4.8%	0.0%	0.0%	0.0%	0.0%	0.0%	710,924
COLORADO	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
CONNECTICUT	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
DELAWARE	182	26.8%	34.7%	9.7%	0.0%	0.0%	14.0%	0.0%	14.8%	0.0%	0.0%	0.0%	0.0%	10,119
DIST. OF COL.	146	59.9%	10.2%	16.4%	0.0%	0.0%	0.0%	0.0%	13.6%	0.0%	0.0%	0.0%	0.0%	6,917
FLORIDA	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
GEORGIA	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
GUAM	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
HAWAII	19	27.7%	10.8%	13.5%	8.8%	12.8%	0.0%	1.4%	20.9%	4.1%	0.0%	0.0%	0.0%	148
IDAHO	37	12.1%	4.6%	77.5%	0.0%	0.0%	5.6%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	659
ILLINOIS	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
INDIANA	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
IOWA	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
KANSAS	311	0.0%	41.8%	43.4%	0.0%	0.0%	14.6%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	13,315
KENTUCKY	667	12.6%	20.3%	3.5%	0.7%	34.0%	1.9%	2.4%	23.0%	1.7%	0.0%	0.0%	0.0%	67,701
LOUISIANA	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
MAINE	3,345	31.0%	17.2%	43.6%	0.0%	2.6%	0.3%	5.2%	0.1%	0.0%	0.0%	0.0%	0.0%	11,543
MARYLAND	51	60.0%	0.0%	25.0%	0.0%	0.0%	0.0%	0.0%	15.0%	0.0%	0.0%	0.0%	0.0%	7,184
MASSACHUSETTS	1,457	15.5%	37.6%	12.8%	1.4%	8.5%	13.3%	10.9%	0.0%	0.0%	0.0%	0.0%	0.0%	110,005
MICHIGAN	394	51.7%	0.0%	42.2%	0.0%	0.0%	0.0%	0.0%	6.1%	0.0%	0.0%	0.0%	0.0%	19,333
MINNESOTA	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
MISSISSIPPI	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
MISSOURI	734	55.3%	26.2%	17.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.5%	0.0%	56,628
MONTANA	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
NEBRASKA	25	56.3%	9.9%	0.0%	0.0%	0.0%	0.0%	0.0%	33.8%	0.0%	0.0%	0.0%	0.0%	2,212
NEVADA	242	60.9%	23.5%	12.7%	0.0%	2.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	21,043
NEW HAMPSHIRE	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
NEW JERSEY	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
NEW MEXICO	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
NEW YORK	4,035	33.6%	17.9%	17.7%	0.0%	0.0%	2.3%	25.1%	0.6%	0.0%	0.0%	2.8%	0.0%	203,245
NORTH CAROLINA	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
NORTH DAKOTA	5	0.0%	14.0%	50.4%	0.0%	0.0%	0.0%	0.0%	5.8%	0.0%	10.7%	19.0%	0.0%	121
OHIO	413	1.0%	77.0%	0.0%	0.0%	22.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	7,994
OKLAHOMA	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
OREGON	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
PENNSYLVANIA	3,542	27.7%	28.6%	14.7%	8.5%	11.5%	3.3%	0.0%	0.9%	1.3%	3.4%	0.0%	0.1%	276,564
PUERTO RICO	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
RHODE ISLAND	163	0.0%	0.0%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	15,541
SOUTH CAROLINA	140	15.1%	54.3%	30.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	9,828
SOUTH DAKOTA	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
TENNESSEE	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
TEXAS	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
UTAH	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
VERMONT	25	35.3%	22.5%	23.2%	0.0%	18.2%	0.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1,412
VIRGIN ISLANDS	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
VIRGINIA	81	46.0%	0.0%	54.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	11,421
WASHINGTON	8,409	56.3%	7.3%	8.0%	20.8%	0.8%	3.7%	0.0%	0.7%	2.1%	0.0%	0.1%	0.2%	1,107,907
WEST VIRGINIA	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
WISCONSIN	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
WYOMING	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0

NR= Not reported.

WEIs with Uncountable Hours Due to Statutory Time Limits on Participation

Where activities are time-limited (such as job search/job readiness assistance and vocational educational training), a State is prohibited by law from counting toward participation rates the hours that exceed the time limit for Federal work participation purposes. Note that States are free to require or allow individuals to participate in these activities beyond the period in which the activities count toward Federal participation rates; the law only restricts the extent to which participation in these activities beyond the statutory limits can count toward Federal participation rates. Current instructions specify that if the time limit is reached, the State should report “zero hours” in the respective category and that the State may then choose to report the actual hours in “other work activities” on its monthly data reports. However, States are not required to report these hours, and because they receive no work participation credit for these hours, may choose not to do so.

As described above in the introduction of work participation data, the statute limits job search/job readiness assistance participation to no more than six weeks per year (12 weeks when the State meets a “needy State” definition),¹³ and vocational educational training to a lifetime limit of 12 months for any individual for participation rate purposes.¹⁴

Table 15 summarizes the average monthly total number of WEIs with uncountable hours due to statutory time limits on participation, broken down by the average number of hours in each countable work activity that were not reported by the State (see Appendix III for definitions of work activities).¹⁵ It shows that 35 States reported having an average monthly total of 24,620 WEIs (2.0 percent of all WEIs) participating in time-limited activities beyond a statutory limit.

¹³ The final rule implementing the DRA defined one week equal to 20 hours for a WEI who is a single custodial parent with a child under six years of age and equal to 30 hours for all other WEIs. Thus, six weeks of job search/job readiness assistance equates to 120 hours for the first group and 180 hours for all others. For those months in which a State can count 12 weeks of this activity, these limits are 240 hours and 360 hours, respectively.

¹⁴ For individuals age 20 and over, the principal way that postsecondary education can count as a “core” TANF activity is as vocational educational training, which is subject to a 12-month lifetime limit for the State to count as participation. In addition, for parents under 20, postsecondary education can count as a core activity as “education directly related to employment.”

¹⁵ As noted above, the table does not capture the 30 percent limit that applies to vocational educational and teen education activities, but only the 12-month lifetime limit on vocational educational training.

Washington State reported the largest average total monthly number of WEIs participating in time-limited activities beyond the statutory limit (4,359 WEIs, or 10.1 percent of the State's WEIs). (See Table 5 for percentages.) It is possible that some States reported zero WEIs in this category because the data has never previously been collected and they lacked the ready capacity to compile it. In its engagement report, one State explained that it "does not collect hours in activities which exceed the maximum time limit allowed for such activities as the hours are not countable and reporting of these hours has no added value to the work participation rate." Similarly, another State explained in its engagement report that its data reporting program is not designed to collect this information. It stated, "The lack of cases in the Job Search/Job Readiness category is more likely due to limitations of the state's data reporting system rather than in actuality. Although the state is able to redirect hours falling into the 5th week of participation in Job Search/Job Readiness out of that category and into the 'Other' category for the standard TANF report, the state was unable to extract those actual hours for this report without extensive reprogramming. Iowa chose to not complete this reprogramming until such time as it is known if this additional reporting is to continue after June 2011."

Nationally, the average monthly total number of hours beyond the statutory limit reported by States was 1,330,545 hours, with 61.2 percent of these hours in job search/job readiness assistance. This is not surprising given that this involves one of the more commonly used TANF activities and it has the shortest time limit. The remaining 38.8 percent of hours beyond the limit are in vocational educational training. (See Table 16 for percentages.)

The effect of these limits may be understated for several reasons. First, most job readiness assistance activities also can be classified as non-countable activities that move a family toward self-sufficiency. For example, some States could consider treatment activities to be "job readiness assistance" if offered within the activity's statutory time limits, or "beyond the statutory limit" otherwise, while others may classify them as "non-countable activity that moves a family toward self-sufficiency." In such circumstances, the activity would not count regardless of the classification. Second, a State may choose not to verify the hours, because they would not

count, so some of the hours also could be classified as “hours of participation that do not meet the verification standards” or simply as “unreported hours.”

In the submissions to HHS, some States suggested that the time limits be expanded or eliminated to better reflect a State’s efforts in moving a family toward self-sufficiency. For example, one State explained, “The current [statutory] limitations mask the efforts of WEIs to gain employment and the state’s efforts to support them in seeking and preparing for work; there is no official recognition of these efforts.”

Other States noted administrative problems in tracking these time-limited provisions. For example, one State’s engagement report states that it “did not report hours of participation in a countable work activity that did not count toward the work participation rate because the hours of participation in that activity are beyond a statutory limit for reporting them as countable... [this State] currently does not allow activities beyond the statutory limits to be negotiated ... Because of this, there is no value in capturing the activities and/or hours.”

Table 15. Average Monthly Total Number of Uncountable Hours due to Statutory Time Limits on Participation By Activity, by State: Apr-Jun, 2011

STATE	WEIs with Uncountable Hours Due to Statutory Time Limits on Participation	Job Search/Job Readiness Assistance	Vocational Educational Training	Total Hours in Countable Activities Beyond Statutory Limits	Average Hours of Participation Beyond Limit
UNITED STATES	24,620	814,329	516,216	1,330,545	54.0
ALABAMA	0	0	0	0	0.0
ALASKA	32	1,792	0	1,792	56.0
ARIZONA	0	0	0	0	0.0
ARKANSAS	0	0	0	0	0.0
CALIFORNIA	3,928	44,625	252,388	297,013	75.6
COLORADO	109	3,953	1,096	5,049	46.3
CONNECTICUT	406	4,874	0	4,874	12.0
DELAWARE	18	105	13	118	6.6
DIST. OF COL.	0	0	0	0	0.0
FLORIDA	20	1,572	0	1,572	78.6
GEORGIA	0	0	0	0	0.0
GUAM	NR	NR	NR	NR	NR
HAWAII	42	282	38	320	7.6
IDAHO	5	402	0	402	80.4
ILLINOIS	119	2,331	0	2,331	19.6
INDIANA	255	4,129	1,040	5,169	20.3
IOWA	188	0	23,044	23,044	122.6
KANSAS	90	1,918	0	1,918	21.3
KENTUCKY	3	0	31	31	10.3
LOUISIANA	113	1,380	5,081	6,461	57.2
MAINE	328	79	8,503	8,582	26.2
MARYLAND	74	5,191	4,672	9,863	133.3
MASSACHUSETTS	0	0	0	0	0.0
MICHIGAN	2,566	152,100	32,325	184,425	71.9
MINNESOTA	187	23,712	0	23,712	126.8
MISSISSIPPI	401	1,611	4,546	6,157	15.4
MISSOURI	0	0	0	0	0.0
MONTANA	0	0	0	0	0.0
NEBRASKA	133	1,269	7,891	9,160	68.9
NEVADA	0	0	0	0	0.0
NEW HAMPSHIRE	0	0	0	0	0.0
NEW JERSEY	1,638	16,242	6,177	22,419	13.7
NEW MEXICO	6	789	0	789	131.5
NEW YORK	2,216	52,781	1,524	54,305	24.5
NORTH CAROLINA	2	386	0	386	193.0
NORTH DAKOTA	2	29	53	82	41.0
OHIO	675	5,173	6,254	11,427	16.9
OKLAHOMA	127	15,291	0	15,291	120.4
OREGON	1,679	71,202	12,250	83,452	49.7
PENNSYLVANIA	397	4,567	1,642	6,209	15.6
PUERTO RICO	0	0	0	0	0.0
RHODE ISLAND	82	5,228	300	5,528	67.4
SOUTH CAROLINA	53	2,208	0	2,208	41.7
SOUTH DAKOTA	0	0	0	0	0.0
TENNESSEE	3,206	89,778	64,620	154,398	48.2
TEXAS	0	0	0	0	0.0
UTAH	103	6,412	243	6,655	64.6
VERMONT	8	37	0	37	4.6
VIRGIN ISLANDS	0	0	0	0	0.0
VIRGINIA	1,010	100,385	0	100,385	99.4
WASHINGTON	4,359	192,443	75,971	268,414	61.6
WEST VIRGINIA	40	0	6,514	6,514	162.9
WISCONSIN	0	0	0	0	0.0
WYOMING	0	53	0	53	0.0

NR= Not reported.

Table 16. Percent of Total Number of Uncountable Hours due to Statutory Time Limits on Participation By Activity, by State: Apr-Jun, 2011

STATE	WEIs with Uncountable Hours Due to Statutory Time Limits on Participation	Job Search/Job Readiness Assistance	Vocational Educational Training	Total Hours in Countable Activities Beyond Statutory Limits
UNITED STATES	24,620	61.2%	38.8%	1,330,545
ALABAMA	0	0.0%	0.0%	0
ALASKA	32	100.0%	0.0%	1,792
ARIZONA	0	0.0%	0.0%	0
ARKANSAS	0	0.0%	0.0%	0
CALIFORNIA	3,928	15.0%	85.0%	297,013
COLORADO	109	78.3%	21.7%	5,049
CONNECTICUT	406	100.0%	0.0%	4,874
DELAWARE	18	89.0%	11.0%	118
DIST. OF COL.	0	0.0%	0.0%	0
FLORIDA	20	100.0%	0.0%	1,572
GEORGIA	0	0.0%	0.0%	0
GUAM	NR	NR	NR	NR
HAWAII	42	88.1%	11.9%	320
IDAHO	5	100.0%	0.0%	402
ILLINOIS	119	100.0%	0.0%	2,331
INDIANA	255	79.9%	20.1%	5,169
IOWA	188	0.0%	100.0%	23,044
KANSAS	90	100.0%	0.0%	1,918
KENTUCKY	3	0.0%	100.0%	31
LOUISIANA	113	21.4%	78.6%	6,461
MAINE	328	0.9%	99.1%	8,582
MARYLAND	74	52.6%	47.4%	9,863
MASSACHUSETTS	0	0.0%	0.0%	0
MICHIGAN	2,566	82.5%	17.5%	184,425
MINNESOTA	187	100.0%	0.0%	23,712
MISSISSIPPI	401	26.2%	73.8%	6,157
MISSOURI	0	0.0%	0.0%	0
MONTANA	0	0.0%	0.0%	0
NEBRASKA	133	13.9%	86.1%	9,160
NEVADA	0	0.0%	0.0%	0
NEW HAMPSHIRE	0	0.0%	0.0%	0
NEW JERSEY	1,638	72.4%	27.6%	22,419
NEW MEXICO	6	100.0%	0.0%	789
NEW YORK	2,216	97.2%	2.8%	54,305
NORTH CAROLINA	2	100.0%	0.0%	386
NORTH DAKOTA	2	35.4%	64.6%	82
OHIO	675	45.3%	54.7%	11,427
OKLAHOMA	127	100.0%	0.0%	15,291
OREGON	1,679	85.3%	14.7%	83,452
PENNSYLVANIA	397	73.6%	26.4%	6,209
PUERTO RICO	0	0.0%	0.0%	0
RHODE ISLAND	82	94.6%	5.4%	5,528
SOUTH CAROLINA	53	100.0%	0.0%	2,208
SOUTH DAKOTA	0	0.0%	0.0%	0
TENNESSEE	3,206	58.1%	41.9%	154,398
TEXAS	0	0.0%	0.0%	0
UTAH	103	96.3%	3.7%	6,655
VERMONT	8	100.0%	0.0%	37
VIRGIN ISLANDS	0	0.0%	0.0%	0
VIRGINIA	1,010	100.0%	0.0%	100,385
WASHINGTON	4,359	71.7%	28.3%	268,414
WEST VIRGINIA	40	0.0%	100.0%	6,514
WISCONSIN	0	0.0%	0.0%	0
WYOMING	0	100.0%	0.0%	53

NR= Not reported.

WEIs with Unreported Countable Hours

Table 17 summarizes the average monthly total number of WEIs with hours that were not reported as countable hours, broken down by the average number of hours in each countable work activity that were not reported by the State (see Appendix III for definitions of work activities).¹⁶ It shows that 18 States reported having an average monthly total of 17,234 WEIs (1.4 percent of all WEIs) with unreported countable hours.

California reported the largest average total monthly number of WEIs participating in time-limited activities beyond the statutory limit (2,619 WEIs, or 0.6 percent of the State's WEIs). Wisconsin reported the highest percent of its State's WEIs as having unreported countable hours (53.5 percent). (See Table 5 for percentages.)

Nationally, the average monthly total number of unreported hours in countable work activities reported by States was 429,734 hours, with the majority of the hours spent on job search/job readiness assistance (36.8 percent). (See Table 18 for percentages.) Indeed, a State may choose not to report these otherwise countable hours of participation due to the statutory time limit on this activity (this also is the case for vocational educational training). For example, if an individual will not meet the work participation standards even if hours related to a time-limited activity are counted (due to insufficient hours) or if the individual already meets the work participation standard without consideration of these hours, the State may choose not to report these hours. By not reporting these hours, the State preserves weeks of countable participation in these time-limited categories. Furthermore, even if an activity is not time-limited, a State may choose not to report related hours simply because the hours are not needed for the WEI to be counted as meeting the work participation rate

¹⁶ As noted above, the table does not capture the 30 percent limit that applies to vocational educational and teen education activities, but only the 12-month lifetime limit on vocational educational training.

Table 17. Average Monthly Total Number of Unreported Countable Hours of Participation, by State: Apr-Jun, 2011

STATE	WEIs with Unreported Hours of Participation	Job Search/Job Readiness Assistance	Unsubsidized Employment	Vocational Educational Training	Satisfactory School Attendance	Education Directly Related to Employment	Community Service	Work Experience	Job Skills Training	On-The-Job Training	Subsidized Private Employment	Subsidized Public Employment	Providing Child Care to a Participant in a Community Service Program	Total Unreported Hours in Countable Work Activities	Average Unreported, Countable Hours Per WEI With Unreported Hours
UNITED STATES	17,234	158,098	142,594	48,686	34,908	34,446	5,275	4,183	1,150	394	0	0	0	429,734	24.9
ALABAMA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
ALASKA	52	1,168	0	0	0	0	0	0	0	0	0	0	0	1,168	22.5
ARIZONA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
ARKANSAS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
CALIFORNIA	2,619	0	138,207	0	34,446	34,446	0	0	0	0	0	0	0	207,099	79.1
COLORADO	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
CONNECTICUT	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
DELAWARE	178	4,343	0	122	0	0	0	0	0	0	0	0	0	4,465	25.1
DIST. OF COL.	312	2,474	0	1,330	0	0	0	0	0	0	0	0	0	3,804	12.2
FLORIDA	581	7,415	0	12,728	0	0	0	0	0	0	0	0	0	20,143	34.7
GEORGIA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
GUAM	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
HAWAII	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
IDAHO	48	1,654	0	135	0	0	0	0	0	0	0	0	0	1,789	37.3
ILLINOIS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
INDIANA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
IOWA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
KANSAS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
KENTUCKY	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
LOUISIANA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
MAINE	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
MARYLAND	685	18,732	0	17,055	0	0	0	0	0	0	0	0	0	35,787	52.2
MASSACHUSETTS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
MICHIGAN	2,443	56,578	0	1,373	0	0	2,255	1,569	0	394	0	0	0	62,169	25.4
MINNESOTA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
MISSISSIPPI	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
MISSOURI	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
MONTANA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
NEBRASKA	254	6,241	1,131	1,581	462	0	961	98	1,150	0	0	0	0	11,624	45.8
NEVADA	313	4,765	849	2,164	0	0	163	0	0	0	0	0	0	7,941	25.4
NEW HAMPSHIRE	151	4,614	0	0	0	0	0	0	0	0	0	0	0	4,614	30.6
NEW JERSEY	687	2,258	0	6,336	0	0	0	0	0	0	0	0	0	8,594	12.5
NEW MEXICO	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
NEW YORK	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
NORTH CAROLINA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
NORTH DAKOTA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
OHIO	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
OKLAHOMA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
OREGON	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
PENNSYLVANIA	399	13,964	0	33	0	0	0	149	0	0	0	0	0	14,146	35.5
PUERTO RICO	615	1,444	2,407	4,919	0	0	1,896	2,349	0	0	0	0	0	13,015	21.2
RHODE ISLAND	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
SOUTH CAROLINA	9	0	0	0	0	0	0	18	0	0	0	0	0	18	2.0
SOUTH DAKOTA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
TENNESSEE	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
TEXAS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
UTAH	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
VERMONT	46	1,592	0	0	0	0	0	0	0	0	0	0	0	1,592	34.6
VIRGIN ISLANDS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
VIRGINIA	405	10,610	0	0	0	0	0	0	0	0	0	0	0	10,610	26.2
WASHINGTON	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
WEST VIRGINIA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
WISCONSIN	7,437	20,246	0	910	0	0	0	0	0	0	0	0	0	21,156	2.8
WYOMING	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0

NR= Not reported.

Table 18. Percent of Total Number of Unreported Countable Hours of Participation, by State: Apr-Jun, 2011

STATE	WEIs with Unreported Hours of Participation	Job Search/Job Readiness Assistance	Unsubsidized Employment	Vocational Educational Training	Satisfactory School Attendance	Education Directly Related to Employment	Community Service	Work Experience	Job Skills Training	On-The-Job Training	Subsidized Private Employment	Subsidized Public Employment	Providing Child Care to a Participant in a Community Service Program	Total Unreported Hours in Countable Work Activities
UNITED STATES	17,234	36.8%	33.2%	11.3%	8.1%	8.0%	1.2%	1.0%	0.3%	0.1%	0.0%	0.0%	0.0%	429,734
ALABAMA	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
ALASKA	52	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1,168
ARIZONA	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
ARKANSAS	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
CALIFORNIA	2,619	0.0%	66.7%	0.0%	16.6%	16.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	207,099
COLORADO	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
CONNECTICUT	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
DELAWARE	178	97.3%	0.0%	2.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	4,465
DIST. OF COL.	312	65.0%	0.0%	35.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	3,804
FLORIDA	581	36.8%	0.0%	63.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	20,143
GEORGIA	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
GUAM	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
HAWAII	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
IDAHO	48	92.5%	0.0%	7.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1,789
ILLINOIS	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
INDIANA	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
IOWA	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
KANSAS	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
KENTUCKY	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
LOUISIANA	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
MAINE	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
MARYLAND	685	52.3%	0.0%	47.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	35,787
MASSACHUSETTS	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
MICHIGAN	2,443	91.0%	0.0%	2.2%	0.0%	0.0%	3.6%	2.5%	0.0%	0.6%	0.0%	0.0%	0.0%	62,169
MINNESOTA	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
MISSISSIPPI	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
MISSOURI	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
MONTANA	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
NEBRASKA	254	53.7%	9.7%	13.6%	4.0%	0.0%	8.3%	0.8%	9.9%	0.0%	0.0%	0.0%	0.0%	11,624
NEVADA	313	60.0%	10.7%	27.3%	0.0%	0.0%	2.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	7,941
NEW HAMPSHIRE	151	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	4,614
NEW JERSEY	687	26.3%	0.0%	73.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	8,594
NEW MEXICO	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
NEW YORK	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
NORTH CAROLINA	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
NORTH DAKOTA	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
OHIO	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
OKLAHOMA	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
OREGON	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
PENNSYLVANIA	399	98.7%	0.0%	0.2%	0.0%	0.0%	0.0%	1.1%	0.0%	0.0%	0.0%	0.0%	0.0%	14,146
PUERTO RICO	615	11.1%	18.5%	37.8%	0.0%	0.0%	14.6%	18.0%	0.0%	0.0%	0.0%	0.0%	0.0%	13,015
RHODE ISLAND	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
SOUTH CAROLINA	9	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	18
SOUTH DAKOTA	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
TENNESSEE	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
TEXAS	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
UTAH	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
VERMONT	46	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1,592
VIRGIN ISLANDS	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
VIRGINIA	405	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	10,610
WASHINGTON	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
WEST VIRGINIA	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
WISCONSIN	7,437	95.7%	0.0%	4.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	21,156
WYOMING	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0

NR= Not reported.

Conclusions for Engagement Reporting

The data collection provided by the ACF-812 provided a more comprehensive understanding of how States are engaging WEIs on their caseloads and applying different methods (outside of the Federal work participation structure) for moving a family towards self-sufficiency; we also gained some clarity as to why some WEIs have zero hours of participation.

As previously noted, in reviewing the data, it is important to keep in mind that the information is being presented for all WEIs, including those that are disregarded from the TANF participation rate calculation under current statutory requirements (because, e.g., they are parents of children under age one or in sanction status). And, as noted, some families will include more than one WEI, and the information being presented is for individuals, not families. With these qualifications in mind, the April-June data tell us that in an average month:

- About one-fourth (24.2 percent) of TANF and SSP WEIs are engaged in countable activities and counting toward TANF participation rates.
- Of the WEIs with hours in self-sufficiency related activities that do not count toward participation rates: 15.7 percent have hours that are insufficient to satisfy the work participation requirements; 5.1 percent have hours in activities that do not count toward the rates; 2.6 percent have hours that do not meet verification standards; 2.0 percent have hours that are not countable due the statutory limits on counting job search/job readiness or vocational educational training; and 1.4 percent have countable hours that the State has elected to not report, either because the hours are not needed or the State does not wish to use hours that will preclude the individual from counting later.
- A majority of WEIs (54.5 percent) have no reported hours of engagement in self-sufficiency related activities during the month. However, the reported reason for the status is that the State or local agency failed to engage the individual for only about 6.9 percent of WEIs. There are a range of other reasons, of which the most common are:
 - The WEI is in the process of being sanctioned, or is sanctioned but not disregarded in the participation rate calculation because the sanction has lasted for more than three months in the year or is for a non-work reason (8.6 percent);

- The WEI is in a family disregarded from the participation rate because the family is a single parent family with a child under age one, the WEI is under a work-related sanction, or the WEI is participating in a Tribal work program (7.6 percent);
- The WEI is exempt due to illness or disability (6.2 percent) or caring for an ill or exempt family member (0.4 percent);
- A wide range of other statuses, including being in the first month of assistance without an assigned activity (2.4 percent); being assigned to an activity that has not yet begun (1.9 percent); being a single parent of a child under age one and not otherwise being disregarded (1.7 percent); being a single parent of a child under the age of six without needed child care (1.0 percent); having recently relocated from another part of the state (0.5 percent) having another good cause exemption (0.5 percent); being exempt due to domestic violence-related issues (0.4 percent); having had activity reports received too late for inclusion (0.3 percent). In addition, 9.3 percent of WEIs were in “Other” statuses, including having a pending assessment, being the second parent in a two-parent family, being in the last month of assistance, having not attended a scheduled activity, reaching a time limit, and other specified reasons.

Accordingly, a review of the data makes clear that a substantial group of WEIs – more than those counting toward participation rates --- is reported to be engaged in self-sufficiency related activities, but not counting toward the rates. And, among those with no reported hours, the principal reported reason is not a failure to engage the individual, but a wide range of other statuses for those without reported hours of activity.

In their analyses of activities, a number of States highlighted concerns that the existing participation rate structure does not fully describe the range of activities and statuses for individuals. For example, Pennsylvania explains, “In addition to the clients that would meet the current WPR goals if the hours from the ACF-812 were countable toward the WPR, the data gives a broader picture of the overall activities of TANF clients. As with the March findings, the April-May-June data show that many more TANF clients are participating in activities that move

them toward self-sufficiency than the narrowly defined WPR requirements would lead one to believe, again raising long-standing and unresolved questions regarding a fair and accurate method of measuring if and how TANF families are moving themselves toward self-sufficiency.”

Some States expressed how the results of this data collection demonstrate the shortcomings of the current work participation rate structure. Ohio states that “the most notable finding was that TANF families are not homogenous; they have different degrees of self-sufficiency, and many face very different barriers to employment. However, the current structure for determining work participation rates does not take this into account. Many individuals were engaged in activities that could not be counted because they lacked sufficient hours, the activities had statutory limits, or the activities were not allowed to be counted under federal regulation.”

Certainly, many States view the ACF-812 data as highlighting the need to re-examine how States are held accountable for how they help families on their caseloads achieve self-sufficiency. Florida states that “The official participation rate reports calculated under current regulations severely under-represent the initiative and energy that both the state program operators and the TANF participants exert in an effort to improve economic conditions for welfare recipients and their families.” Alaska advocates for a “broader and more flexible test of ‘engaged,’ [which] reveals that the vast majority of families are engaged in meaningful activities and working towards economic self-sufficiency... Identifying those families who are in countable activities regardless of whether they met the participation standards and/or meaningful self-sufficiency activities that are not currently countable activities yield a much more accurate picture of the efforts of families to achieve self-sufficiency, and the success of State TANF programs in providing services to families as they work towards their economic goals.”

Other Research on Participation and Engagement

The Office of Planning, Research and Evaluation at the Administration for Children and Families began a study in October 2011 to describe the circumstances surrounding non-participation in work activities in selected States reflected in data reported to OFA. The objective of the study will be to explain the circumstances of individuals who have no hours of participation and the

principal reasons for such non-participation. The research will entail field research in selected States, with a goal of providing additional insight into these issues. HHS plans to issue a report from the study in the summer of 2012.

TANF FINANCIAL DATA

States receive about \$16.5 billion in TANF grants each year. The law establishing TANF also created two additional funding streams: (1) supplemental grants for States with high population growth or low welfare grants (\$319 million per year for the 17 States that have qualified for these grants)¹⁷; and (2) a \$2 billion Contingency Fund for States that experienced rising unemployment rates or food stamp (now SNAP) caseloads.¹⁸ In addition, the American Recovery and Reinvestment Act of 2009 (ARRA) created an additional Emergency Contingency Fund, which provided up to \$5 billion for FY 2009 and FY 2010 for jurisdictions that experienced an increase in assistance caseloads and certain types of expenditures. States also are required to meet a “maintenance-of-effort (MOE) requirement” by demonstrating spending for low-income families with children, of at least 80 percent of the amount of State funds used in FY 1994 for the Aid to Families with Dependent Children (AFDC) program and related programs (about \$11 billion, nationally). The “MOE requirement” is reduced to 75 percent for a State if it meets its work participation rate requirements for the year.

TANF and MOE funds can be spent on “assistance” and “non-assistance.” “Assistance” includes cash and other benefits designed to meet a family’s ongoing basic needs. The major TANF program requirements (e.g., work requirements, time limits on Federal assistance, and data reporting) apply only to families receiving “assistance.” “Non-assistance” benefits are those that do not fall within the definition of assistance, and include expenditures such as child care, transportation, and other work supports provided to employed families, non-recurrent short-term benefits, Individual Development Accounts, refundable Earned Income Tax Credits, work subsidies to employers, and services such as education and training, case management, job search, and counseling. In FY 2010, total Federal TANF and State MOE expenditures on “assistance” amounted to \$12.3 billion, compared with \$20.9 billion that was spent as “non-assistance.”

¹⁷ These grants were extended through June 30, 2011, resulting in a total of \$211 million being available for FY 2011. This funding source was zeroed out for FY 2012.

¹⁸ The Continuing Appropriations Act, 2011, appropriated to the fund \$506 million in FY 2011 and \$612 million in FY 2012. Subsequently, the FY 2011 appropriation was reduced to \$334 million by the Claims Resolution Act of 2010.

Financial Data Reporting Requirements

States are required to submit quarterly reports to HHS summarizing the amounts and categories in which TANF and State MOE funds were spent. The ACF-196 Federal reporting form is due 45 days after the end of the reporting quarter, although States often make adjustments or corrections to this data after the deadline. The form requires the reporting of five types of expenditures: (1) Federal TANF expenditures, (2) MOE State expenditures in TANF, (3) MOE expenditures in separate State programs, (4) Federal Contingency Fund expenditures, and (5) Federal Emergency Contingency Fund expenditures (beginning with FY 2009). These expenditures are divided into two primary sections: “assistance” and “non-assistance,” as described in Table 19 below. The table includes line references to each type of expenditure.

Table 19: TANF ACF-196 Reporting Categories for Assistance and Non-assistance Expenditures	
Assistance Expenditures (Line 5)	Non-assistance Expenditures (Line 6)
Basic assistance (line 5.a.)	Work related activities (line 6.a.)
Child care (for those not employed) (line 5.b.)	Child care (line 6.b.)
Transportation and other supportive services (for those not employed) (line 5.c.)	Transportation (line 6.c.)
Authorized solely under prior law (line 5.d.)	Individual Development Accounts (line 6.d.)
	Refundable Earned Income Tax Credit (line 6.e.)
	Other refundable tax credits (line 6.f.)
	Non-recurrent short-term benefits (line 6.g.)
	Prevention of out-of-wedlock pregnancies (line 6.h.)
	Two-parent family formation and maintenance (line 6.i.)
	Administration (line 6.j.)
	Systems (line 6.k.)
	Authorized solely under prior law (line 6.l.)
	Other (line 6.m.)

The Claims Resolution Act required additional State reporting concerning two categories for which there was previously only limited reported information – “other non-assistance” (line 6.m.) and “authorized solely under prior law” (lines 5.d. and 6.l.), which may be either “assistance” or “non-assistance.”

“Other non-assistance” involves expenditures that meet a TANF purpose, but do not fall within the definition of “assistance” or any other listed category. In FY 2010, total Federal and State MOE expenditures “other non-assistance” totaled \$4,251,323,268. As an addendum to the 4th quarter report, States must provide a narrative description of the activities and associated expenditures for such “other” expenditures, although this reporting has often been incomplete.

Nevertheless, these reports suggest that States have used funds reported in this category for a wide variety of benefits and services, including child welfare services, diversion, emergency assistance, substance abuse treatment, services for victims of domestic violence, before- and after-school initiatives, and payments to food banks and homeless shelters.

Expenditures “authorized solely under prior law” do not meet a TANF purpose, but are allowed pursuant to Section 404(a)(2) of the Social Security Act, which permits States to use TANF – but not MOE – funds in any manner that was allowed under the prior Title IV-A (AFDC) or IV-F (Job Opportunities and Basic Skills Training Program) on September 30, 1995, or at State option, August 21, 1996.¹⁹

In FY 2010, this category totaled \$1,700,129,715 in total Federal expenditures, with \$639,978,251 spent on assistance and \$1,060,151,464 going towards non-assistance. States reporting expenditures on these lines (i.e., 5.d. or 6.l.) must include a footnote explaining the nature of these benefits and reference the State plan provision under which they were authorized; however, this reporting also has been frequently incomplete. This category mainly involves juvenile justice and non-relative foster care expenditures that were permissible under Emergency Assistance Programs in effect at the time that AFDC was repealed.

Financial Data Trends in Past Years

Historical data provides information concerning trends in the amount of TANF and MOE spending for “other” non-assistance and expenditures “authorized solely under prior law.” Use of TANF funds for “other” non-assistance grew between FY 1997 and FY 2000, but total spending in this category has changed little since that time. MOE spending for “other” non-assistance has fluctuated over time and has grown from \$808 million in FY 2004 to about \$2.5 billion in FY 2010.

The first year of reported spending for activities “authorized solely under prior law” (both assistance and non-assistance) was in FY 1999, when it accounted for less than one percent of

¹⁹ For example, if a State's approved AFDC plan as of September 30, 1995, allowed it to assist children in the juvenile justice system, then it may continue to use TANF funds for such activities even though the child is not living with a parent or other adult caretaker relative.

total TANF and MOE spending. However, reporting in FY 1999 in this category appeared to reflect confusion and the amount may be inaccurate. Expenditures in this category are far higher in FY 2000; since this year total spending in this category increased until it peaked at about \$1.8 billion in FY 2002 (10.2 percent of total TANF and MOE spending, including transfers to Social Services Block Grant [SSBG] and Child Care Development Fund [CCDF]). Expenditures have fluctuated some since then, and were \$1.7 billion in FY 2010 (4.8 percent of total TANF and MOE spending, including transfers to SSBG and CCDF). Furthermore, the share of assistance and non-assistance expenditures changed over time. Assistance “authorized solely under prior law” has decreased from over \$1 billion in FY 2002, when this type of spending was at its highest, to \$639 million in FY 2010, dropping by over 37 percent. On the other hand, non-assistance “authorized solely under prior law” expenditures have been increasing since FY 2000, when they were first reported (except for a slight drop reported in FY 2006); spending in this category has more than tripled from \$324,699,801 in FY 2000 to \$1,060,151,464 in FY 2010.

Year	"Other" Non-Assistance Federal	"Other" Non-Assistance MOE	Total "Other" Non-Assistance	Assistance ASUPL	Non-Assistance ASUPL	Total ASUPL	Total
1997	\$838,088,425	\$940,631,420	\$1,778,719,845	\$0	\$0	\$0	\$1,778,719,845
1998	\$1,451,662,579	\$1,373,984,825	\$2,825,647,404	\$0	\$0	\$0	\$2,825,647,404
1999	\$1,791,154,357	\$1,668,315,530	\$3,459,469,887	\$28,844,617	\$0	\$28,844,617	\$3,488,314,504
2000	\$1,090,607,332	\$877,950,658	\$1,968,557,990	\$900,339,325	\$324,699,801	\$1,225,039,126	\$3,193,597,116
2001	\$2,068,830,649	\$1,085,291,179	\$3,154,121,828	\$960,272,045	\$665,359,544	\$1,625,631,589	\$4,779,753,417
2002	\$1,743,911,551	\$1,018,163,552	\$2,762,075,103	\$1,022,435,536	\$768,881,717	\$1,791,317,253	\$4,553,392,356
2003	\$1,947,499,286	\$941,242,525	\$2,888,741,811	\$801,605,456	\$844,918,075	\$1,646,523,531	\$4,535,265,342
2004	\$2,035,405,641	\$808,404,549	\$2,843,810,190	\$817,146,702	\$973,776,280	\$1,790,922,982	\$4,634,733,172
2005	\$1,831,754,572	\$969,867,473	\$2,801,622,045	\$592,848,551	\$945,359,998	\$1,538,208,549	\$4,339,830,594
2006	\$1,786,988,636	\$1,324,736,275	\$3,111,724,911	\$563,112,172	\$749,946,846	\$1,313,059,018	\$4,424,783,929
2007	\$1,936,346,582	\$1,478,291,375	\$3,414,637,957	\$701,019,338	\$813,695,475	\$1,514,714,813	\$4,929,352,770
2008	\$1,785,028,480	\$1,971,528,861	\$3,756,557,341	\$519,498,379	\$1,102,726,164	\$1,622,224,543	\$5,378,781,884
2009	\$1,936,568,075	\$2,633,080,996	\$4,569,649,071	\$575,016,148	\$1,091,569,269	\$1,666,585,417	\$6,236,234,488
2010	\$1,873,584,756	\$2,490,178,224	\$4,363,762,980	\$639,978,251	\$1,060,151,464	\$1,700,129,715	\$6,063,892,695

Together, all these categories comprised just under \$6.1 billion, or 17.0 percent of total TANF and MOE spending and transfers to SSBG and CCDF in FY 2010.

Prior Research on Financial Data

In FY 2008, HHS's Office of Planning Research and Evaluation contracted with MPR to examine how States were spending Federal TANF funds reported as "other" and "authorized solely under prior law" on the ACF-196, the TANF financial reporting form, in FY 2007.²⁰

MPR collected data from 47 States about key spending areas, 28 of whom provided dollar amounts as well. The report identified the following key spending areas:

- Child welfare, such as in-home services/family preservation, child protective services, foster care/kinship care, and adoption services (31 States).
- Personal supports, such as mental health and addiction services, health/disabilities services, and domestic violence services (24 States).
- Emergency assistance, such as housing, energy, food, clothing, and transportation (20 States).
- Education and prevention programs, such as education and youth programs, teen pregnancy prevention, and early childhood care and education (19 States).
- Miscellaneous activities, such as services to special populations, employment services and work supports, funds to faith-based and community organizations, marriage/parenting initiatives, child support, and adult/postsecondary education (33 States).

MPR noted that the ACF-196 provides several broad categories for State reporting (see Table 14 above), but some types of expenditures can be listed in more than one category, depending on how the State views the purpose of the expenditures. For example, some States have classified early childhood education programs as "child care," while others have classified them in the "other" category because they consider the activities to go beyond the provision of child care to include educational instruction and other activities.²¹

²⁰ ["Understanding Two Categories of TANF Spending: 'Other' and 'Authorized Under Prior Law'."](#) Washington, DC: Mathematica Policy Research, September 2009, Michelle K. Derr, Tara Anderson, LaDonna Pavetti, and Elizabeth Scott.

²¹ The flexibility in categorization became particularly obvious with the advent of the Emergency Contingency Fund, when many States shifted expenditures into the non-recurrent short-term benefits category to qualify for additional funds from the Emergency Contingency Fund. This shift was possible because the expenditure categories are not mutually exclusive. For example, some States reclassified Refundable Earned Income Tax Credits or short-term transportation assistance as non-recurrent short-term benefits in order to claim these expenditures for TANF Emergency Fund reimbursement, even though there are other categories on the ACF-196 under which these expenditures may be reported

Claims Resolution Act Financial Data Reporting

On February 14, 2011, HHS issued a Program Instruction (TANF-ACF-PI-2011-04) and a new reporting form -- the Detailed Expenditure Form: ACF-196 Supplement (ACF-196(SUP)) -- to implement the spending-related requirements of the Claims Resolution Act. States are required to collect disaggregated financial expenditure data for funds that have been reported in the “other” (line 6m) and assistance and non-assistance “authorized solely under prior law” (lines 5.d. and 6.l., respectively) categories on the ACF-196, the TANF Financial Report. All States must complete and submit the Detailed Expenditure Form.

When deriving the subcategories for reporting the disaggregated expenditures, HHS used the list of spending categories in the MPR report referenced above as a starting point, making changes to the list based on other reports of State expenditures. The reporting instructions do not define these subcategories, but provide examples of the types of expenditures that could be included or have been included in the past. Part 1 asks States to report expenditures for each subcategory by funding source, e.g. Federal TANF block grant, State MOE expenditures in TANF, etc. In Part 2 of the ACF-196(SUP) form, States are required to provide a short description of the activities included in each subcategory (see Appendix IV for ACF-196(SUP) instructions). Furthermore, for activities “authorized solely under prior law,” they are to provide a reference to the State plan provision under which the activities were authorized.

A copy of the ACF-196(SUP) forms submitted by each State for the months of April-June 2011 is provided in Appendix V of this report. Every State submitted the form by September 15, 2011.

There are some caveats to consider in analyzing the financial data presented in this report. While ongoing reporting on the ACF-196 requires States to report obligated expenditures for a quarter and may include adjustments to expenditures reported in past quarters for a particular category, the ACF-196(SUP) required States to report actual expenditures. Some States indicated that it would be difficult to obtain the requested data in the required timeframe, particularly if data had

to first be obtained from counties or contractors; as a result, the expenditure data reported as of September 15, 2011, may reflect incomplete data for the April-June quarter.

In addition, it was clear from the MPR report above that in many cases, States were reporting as “other” non-assistance certain expenditures that should more appropriately be reported in other categories on the ACF-196. For example, teen pregnancy prevention was sometimes classified as “other,” even though there is a dedicated reporting category for it. And, emergency assistance expenditures reported as “other” likely could be more appropriately reported as “non-recurrent short-term benefits.” However, States were encouraged to submit their reporting for the March and April-June reports based on the same categorization approaches that they had most recently been using (i.e., not to revise and reclassify), on the premise that it would be more informative for Congress if States described what they had been doing rather than engage in a reclassification process to better align with the reporting categories.

Claims Resolution Act Financial Data Findings and Analysis

Nationally, “other” non-assistance expenditures totaled \$878,983,444 for April-June 2011, while States spent a total of \$327,701,820 for assistance and non-assistance “authorized solely under prior law.”

For the entire fiscal year, spending would be \$3.5 billion and \$1.3 billion for “other” non-assistance, and assistance and non-assistance “authorized solely under prior law,” respectively, if spending across four quarters were four times the spending in April-June. This is about \$1.2 billion less than total spending in both these categories in FY 2010. This large decrease is primarily due to the drop of about \$1.1 billion nationally in MOE expenditures for “other” non-assistance between FY 2010 and annual projected FY 2011 expenditures based on April-June expenditures reported on the ACF-196(SUP). While we recognize that it is imperfect to simply project annual expenditures based on a quarterly report, and that the ACF-196 and ACF-196(SUP) are designed to capture two different types of expenditure data (i.e., obligated expenditures with adjustments to past reports and actual expenditures, respectively), we asked a

few²² States to provide possible explanations for the difference in MOE expenditures for “other” non-assistance.

The most common response we received was that State TANF agencies are largely dependent on other State agencies for MOE expenditures, and these State agencies typically do not report the expenditures that the State TANF agency claims as MOE until the end of the fiscal year.

Washington explained, “We have agreements with 3rd party MOE sources that they will provide their FFY [Federal fiscal year] data and expenditures at the close of the FFY rather than on an on-going basis. This was agreed to as a way for them to help with our MOE reporting requirements without undertaking the additional workload of preparing monthly or quarterly reports since many of them wouldn’t have their data available until they prepared a year-end summary. It was a critical issue in our securing their participation in our annual MOE reporting process. Therefore, a straight line projection of annual expenditures based on April - June reporting does not produce an accurate estimate. It also follows that if the ACF-196(SUP) captured financial data for the fourth quarter instead of the third quarter, it is likely that MOE expenditures for “other” non-assistance would be over-estimated if quarterly expenditures were projected annually.

Another common explanation for the variation in “other” non-assistance expenditures was that some programs that had been previously funded with MOE were either discontinued or now funded with Federal TANF funds. Finally, New York explained that some of the MOE “other” expenditures were for “ child welfare service activities from NYS’s Office of Child and Family Services...[which] are reported on a 1 or 2 quarter lag [and]... not available as of June 2011.”

Below is a summary analysis of each category on the ACF-196(SUP). Note that many of the categories included in the ACF-196(SUP) and discussed below are actually delineated on the ACF-196 form (e.g., teen pregnancy prevention). As explained above, States often report certain expenditures as “other” non-assistance even though they could report them in alternative categories on the ACF-196. This inconsistency in reporting between States limits our ability to

²² Most of the States we asked reported large MOE expenditures for “other” non-assistance in FY 2010, but did not report any MOE expenditures on the ACF-196(SUP) for the April-June quarter in FY 2011. We also asked a few States with a large variation between average quarterly “other” non-assistance expenditures for FY 2010 and the expenditures reported for April-June 2011.

aggregate total expenditures in any one spending category and to make accurate comparisons of year-to-year data, as a State may change how it categorizes its expenditures.

“Other” Non-Assistance

Forty-five States reported expenditures in “other” non-assistance, ranging from \$133,579,628 in California to \$29,794 in North Dakota. Total “other” non-assistance reported for the April-June quarter equaled \$878,983,444. Chart 2 shows total expenditures by subcategory (including the percentage distribution), broken down by funding stream, while Chart 3 conveys the number of States that reported expenditures in each subcategory. Federal funds include TANF block grant funds, contingency funds, and ARRA emergency contingency funds. State MOE funds are expended in both the TANF program and separate State programs.

Chart 2: Expenditures for "Other" Non-Assistance, April-June 2011

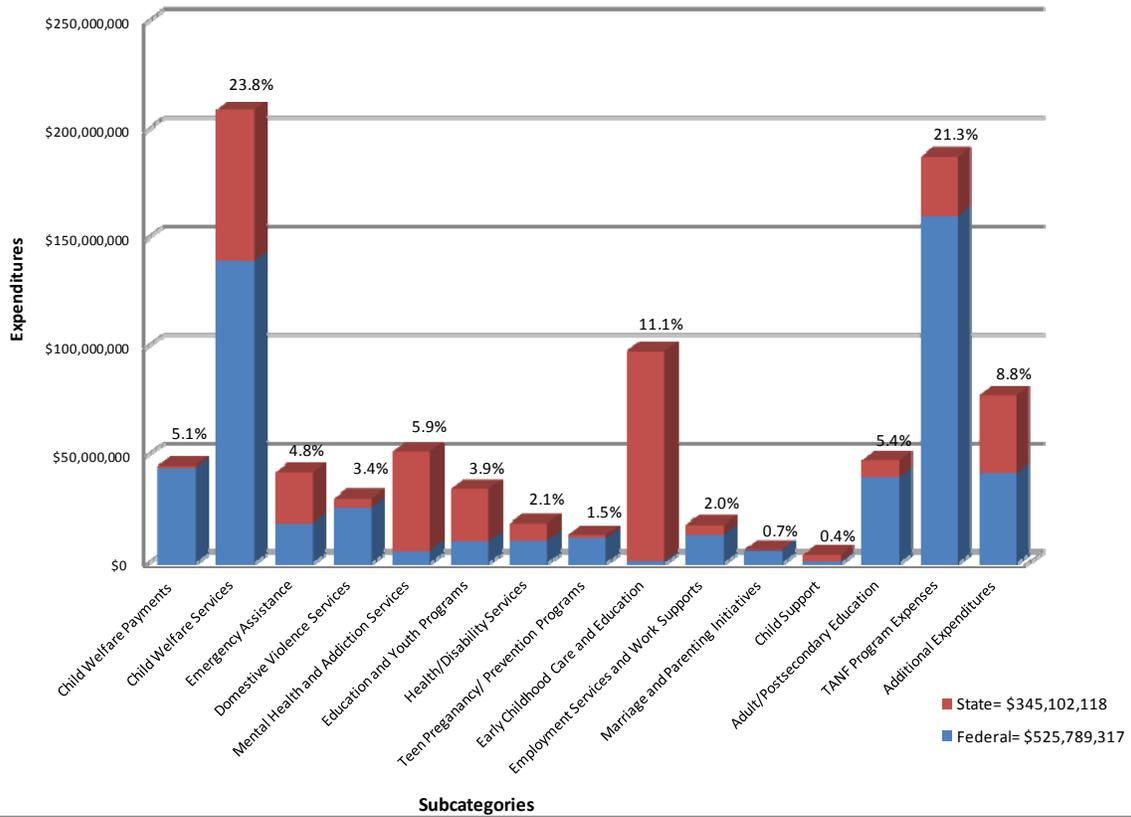


Chart 3: Number of States Reporting Expenditures for "Other" Non-Assistance, by Subcategory

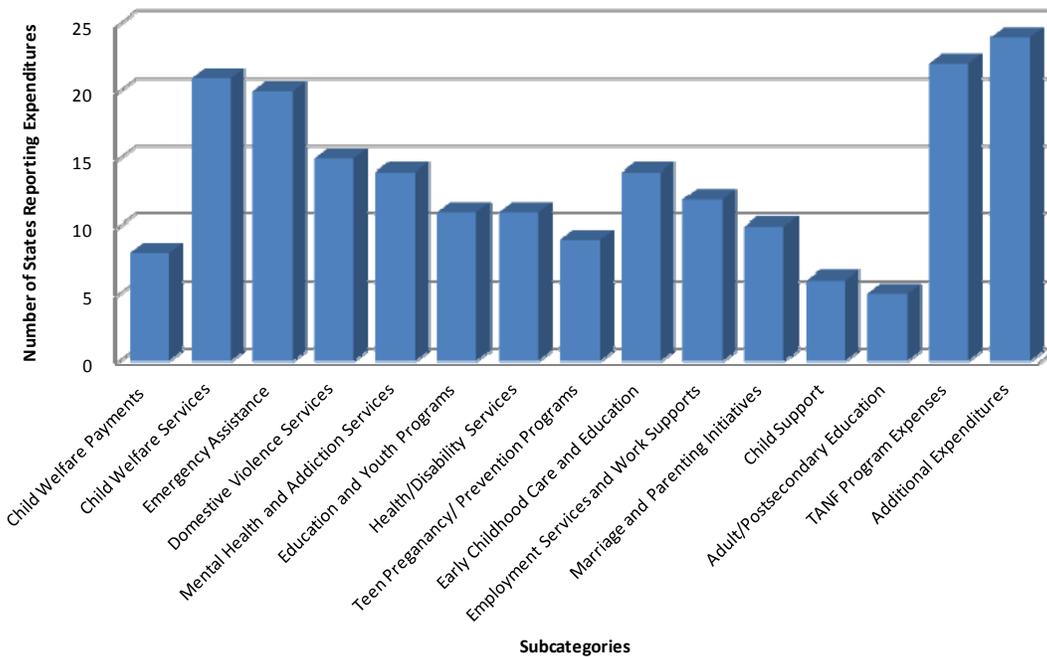


Table 21 below summarizes expenditures in each State by subcategory.

Expenditures for "Other" Non-Assistance by Subcategory and State, April-June 2011																
STATE	Total "Other" Non-Assistance	Child Welfare Payments and Services	Child Welfare Services	Emergency Assistance	Domestic Violence Services	Mental Health and Addiction Services	Education and Youth Programs	Health/Disability Services	Teen Pregnancy/Prevention Programs	Early Childhood Care and Education	Employment Services and Work Supports	Marriage and Parenting Initiatives	Child Support	Adult/Postsecondary Education	TANF Program Expenses	Total Additional Expenditures:
UNITED STATES	\$878,983,444	\$44,873,004	\$209,108,931	\$41,832,814	\$29,796,577	\$51,410,513	\$34,004,208	\$18,232,901	\$12,962,053	\$97,695,198	\$17,549,917	\$5,847,692	\$3,857,299	\$47,187,788	\$187,340,185	\$77,284,364
ALABAMA	\$9,481,776	\$0	\$2,685,758	\$3,577,226	\$0	\$0	\$0	\$0	\$0	\$2,808,075	\$361,511	\$0	\$0	\$0	\$0	\$49,206
ALASKA	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
ARIZONA	\$42,005,470	\$0	\$30,325,785	\$5,113,116	\$3,981,469	\$636,873	\$0	\$0	\$0	\$0	\$223,602	\$0	\$0	\$0	\$0	\$1,724,625
ARKANSAS	\$1,627,438	\$69,575	\$1,557,863	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
CALIFORNIA	\$133,579,628	\$0	\$0	\$0	\$7,643,508	\$41,743,468	\$0	\$0	\$8,849,306	\$0	\$677	\$0	\$148,172	\$0	\$70,389,583	\$4,804,914
COLORADO	\$30,110,019	\$0	\$0	\$0	\$123,219	\$60,621	\$0	\$14,356	\$0	\$279,117	\$0	\$20,362	\$0	\$0	\$26,059,719	\$3,552,625
CONNECTICUT	\$42,893,919	\$0	\$8,852,501	\$150,751	\$0	\$0	\$0	\$289,984	\$0	\$18,025,860	\$0	\$0	\$0	\$0	\$2,137,194	\$13,437,629
DELAWARE	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
DIST. OF COL.	\$2,417,795	\$0	\$0	\$211,082	\$1,451,237	\$0	\$392,627	\$0	\$0	\$0	\$357,849	\$5,000	\$0	\$0	\$0	\$0
FLORIDA	\$68,138,842	\$5,119,323	\$51,375,034	\$87,366	\$1,305,772	\$3,671,155	\$0	\$0	\$40,000	\$0	\$0	\$7,448	\$0	\$0	\$6,323,590	\$209,154
GEORGIA	\$73,542,385	\$18,852,187	\$30,569,106	\$1,602,631	\$5,051,400	\$87,069	\$11,557,111	\$0	\$0	\$0	\$5,257,114	\$0	\$0	\$0	\$565,767	\$0
GUAM	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
HAWAII	\$10,205,840	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$10,205,840
IDAHO	\$465,643	\$0	\$50,940	\$0	\$0	\$0	\$0	\$0	\$0	\$270,112	\$0	\$0	\$82,212	\$0	\$62,379	\$0
ILLINOIS	\$22,946,637	\$0	\$873,057	\$0	\$1,555,051	\$0	\$1,443,983	\$0	\$2,529,698	\$7,894,046	\$0	\$0	\$0	\$262,168	\$1,009,692	\$7,378,942
INDIANA	\$14,521,769	\$0	\$6,274,287	\$495,914	\$0	\$0	\$0	\$7,751,568	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
IOWA	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
KANSAS	\$6,827,493	\$0	\$4,211,450	\$0	\$447,333	\$380,600	\$0	\$0	\$77,238	\$654,060	\$0	\$0	\$0	\$0	\$0	\$1,056,812
KENTUCKY	\$10,121,507	\$2,868,068	\$0	\$55,480	\$0	\$692,905	\$0	\$0	\$0	\$0	\$315,052	\$0	\$0	\$0	\$6,045,955	\$144,047
LOUISIANA	\$25,139,751	\$12,073,100	\$0	\$158,410	\$0	\$0	\$8,063,161	\$982,010	\$0	\$0	\$0	\$0	\$0	\$742,274	\$440,006	\$2,680,790
MAINE	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
MARYLAND	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
MASSACHUSETTS	\$49,672,692	\$0	\$0	\$9,745,774	\$0	\$0	\$0	\$0	\$0	\$640,325	\$0	\$0	\$0	\$39,286,593	\$0	\$0
MICHIGAN	\$38,126,342	\$0	\$0	\$3,371,335	\$0	\$0	\$0	\$0	\$0	\$0	\$3,928,959	\$0	\$0	\$25,887,115	\$4,938,933	\$0
MINNESOTA	\$1,948,252	\$0	\$0	\$0	\$0	\$0	\$0	\$62,535	\$37,794	\$1,425,000	\$0	\$0	\$422,923	\$0	\$0	\$0
MISSISSIPPI	\$848,254	\$0	\$834,697	\$0	\$0	\$0	\$0	\$0	\$13,557	\$0	\$0	\$0	\$0	\$0	\$0	\$0
MISSOURI	\$8,097,142	\$0	\$0	\$0	\$0	\$0	\$8,097,142	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
MONTANA	\$871,798	\$0	\$0	\$0	\$0	\$0	\$138,605	\$0	\$0	\$0	\$0	\$0	\$161,292	\$0	\$0	\$571,901
NEBRASKA	\$1,204,861	\$0	\$1,137,013	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$67,848
NEVADA	\$5,842,380	\$0	\$0	\$0	\$92,081	\$52,556	\$0	\$774,982	\$41,073	\$0	\$0	\$0	\$0	\$0	\$4,714,737	\$166,951
NEW HAMPSHIRE	\$1,145,444	\$0	\$1,088,655	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$41,261	\$15,528
NEW JERSEY	\$625,087	\$0	\$0	\$0	\$625,087	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
NEW MEXICO	\$1,170,107	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1,170,107	\$0	\$0	\$0	\$0
NEW YORK	\$91,342,222	\$0	\$59,385,157	\$6,373,424	\$4,875,060	\$602,641	\$3,361,652	\$210,060	\$207	\$400	\$2,274,069	\$32,938	\$0	\$18,154	\$107,851	\$14,100,609
NORTH CAROLINA	\$4,585,982	\$0	\$4,306,345	\$4,845	\$40,097	\$6,589	\$157,450	\$104	\$0	\$0	\$67,896	\$0	\$0	\$0	\$2,656	\$0
NORTH DAKOTA	\$29,794	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$29,794
OHIO	\$38,219,103	\$0	\$1,005,758	\$354,502	\$0	\$0	\$249,292	\$0	\$0	\$46,762	\$7,923,771	\$0	\$0	\$0	\$28,639,018	\$0
OKLAHOMA	\$8,085,365	\$2,317,957	\$33,317	\$521,127	\$0	\$27,892	\$0	\$1,432,820	\$0	\$0	\$77,558	\$82,545	\$0	\$0	\$896,492	\$2,695,657
OREGON	\$17,239,564	\$0	\$0	\$0	\$1,334,504	\$1,430,720	\$0	\$0	\$0	\$2,072,842	\$0	\$0	\$0	\$0	\$11,509,817	\$891,681
PENNSYLVANIA	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
PUERTO RICO	\$3,405,449	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$3,405,449
RHODE ISLAND	\$7,105,866	\$0	\$0	\$6,405,866	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$700,000
SOUTH CAROLINA	\$34,125,749	\$3,395,220	\$647,994	\$83,359	\$603,915	\$0	\$0	\$0	\$0	\$22,059,555	\$0	\$457,107	\$0	\$6,878,599	\$0	\$0
SOUTH DAKOTA	\$134,780	\$0	\$0	\$0	\$0	\$42,031	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$92,749
TENNESSEE	\$17,135,777	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$14,383,109	\$0	\$0	\$2,632,099	\$0	\$120,569	\$0
TEXAS	\$33,679,384	\$0	\$1,562,374	\$0	\$0	\$0	\$0	\$3,589,534	\$0	\$27,135,935	\$0	\$111,541	\$0	\$0	\$0	\$1,280,000
UTAH	\$8,110,042	\$0	\$0	\$3,495,333	\$0	\$0	\$0	\$0	\$1,373,180	\$0	\$0	\$0	\$0	\$0	\$0	\$3,241,529
VERMONT	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
VIRGIN ISLANDS	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
VIRGINIA	\$4,046,527	\$177,574	\$0	\$0	\$666,844	\$0	\$0	\$3,124,948	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$77,161
WASHINGTON	\$1,614,982	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1,614,982
WEST VIRGINIA	\$559,236	\$0	\$0	\$23,444	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$535,792	\$0
WISCONSIN	\$3,233,791	\$0	\$566,427	\$1,829	\$0	\$1,975,393	\$154,847	\$0	\$0	\$0	\$124,694	\$0	\$410,601	\$0	\$0	\$0
WYOMING	\$2,751,560	\$0	\$1,765,413	\$0	\$0	\$0	\$388,338	\$0	\$0	\$0	\$566,124	\$31,685	\$0	\$0	\$0	\$0

Below is an analysis of the "other" non-assistance subcategories, presented in the order they are listed on the ACF-196(SUP); each section highlights the narrative provided by the State with the most spending in the subcategory.

Child Welfare Payments

States may allocate TANF funds towards various child welfare activities, including:

- Collaborating with the child welfare agency to identify and serve children in needy families who are at risk of abuse or neglect (e.g., family counseling, vocational and educational counseling, and counseling directed at specific problems such as needs resulting from developmental disabilities);
- Providing cash assistance to needy caretaker relatives or providing appropriate supportive services (e.g., referral services, child care, transportation, and respite care) to caregiver relatives who can provide a safe place for a needy child to live and avoid his or her placement in foster care; and
- Screening families who have been sanctioned under TANF for risk of child abuse or neglect and providing case management services designed to eliminate barriers to compliance.

While States are able to fund many child welfare activities with IV-E funds (i.e., Federal Payments for Foster Care and Adoption Assistance), some States use TANF funds to provide payments and services that are not reimbursable under IV-E, or to supplement IV-E-funded assistance. Nevertheless, the TANF Funding Guide clearly states that “although States have considerable flexibility to expend TANF funds consistent with the purposes of TANF, the statutory language indicates that Congress intended for States to continue to operate their... foster care, and adoption assistance programs under titles IV-D and IV-E of the Social Security Act. Thus, use of TANF or MOE funds to supplant State spending in these programs is not allowable.

Under Child Welfare Payments, States were instructed to report expenditures such as “foster care maintenance payments, guardianship and adoption subsidies, and associated costs.”

Eight States reported expenditures in Child Welfare Payments. Total spending equaled \$44,873,004, or 5.1 percent of “other” non-assistance for April-June 2011. Expenditures ranged from \$18,852,187 in Georgia to \$69,575 in Arkansas.

Georgia states that “The largest share of these expenditures related to payments to related caregivers to care for a child who has come into the custody of Georgia's Child Welfare system ("enhanced relative rate" in our terminology), who used to be in the custody of Georgia's Child Welfare system but have been released and are in the ongoing care of a related caregiver ("relative care subsidy" in our terminology), or who used to be in the custody of Georgia's Child Welfare system but have been released and are in a formal subsidized guardianship placement with a related caregiver ("subsidized guardianship" or "enhanced subsidized guardianship" in our terminology). Another expenditure relates to institutional care for children to deal with conditions and behaviors that keep them from living with their families (child care institutions). We also have expenditures related to a program called Community Integration that provides intensive support services to children and their families to support a placement move from the child back into the family setting. We have similar but less intensive services referred to as Permanency/reunification services that also assist children in moving back into family based placements.”

Generally, TANF expenditures for child welfare payments are permissible only under TANF in a limited number of circumstances in order to avoid the supplanting of Federal TANF IV-E payments; they are often provided as non-recurrent short term benefits to address a short-term crisis or emergency, for example, to prevent removal of a child from a home that is being investigated for neglect. Other examples of Child Welfare Payments, as described by States for this reporting, are adoption subsidies and payments for clothing for children in foster care.

States also frequently provide Child Welfare Payments on behalf of children living with a caretaker relative (more commonly known as “kinship care”), or legal guardians or other individuals standing in “loco parentis” (if provided by State law).²³ However, States generally report these payments as “assistance,” as defined at 260.31(a), provided to a child-only assistance unit (as oppose to non-assistance). In order for a State to provide payments to children in foster care who are not living with a caretaker relative,²⁴ it may do so only if it provided such benefits under an approved plan as of September 30, 1995, or at State option, August 21, 1996 (see descriptions of assistance and non-assistance “authorized solely under prior

²³ <http://www.acf.hhs.gov/programs/ofa/polquest/usefunds.htm>

²⁴ These families do not meet the family composition criterion necessary to qualify for TANF “assistance” (see section 408(a)(1) of the Social Security Act) or some MOE-funded benefits (see 45 CFR 263.2(b)).

law” below). Indeed, South Carolina’s description of its expenditures for Child Welfare Payments included “foster care maintenance payments,” causing us to question the State’s reasoning for reporting these expenditures under this subcategory. We asked the State to provide us with additional detail about these expenditures; specifically, we asked if the reported TANF funds are only used for payments to families that consist of a child living with a caretaker relative or an individual standing “in loco parentis” and why the State does not consider these payments to be “assistance,” as defined at 45 CFR 260.31. The State responded that it “continues to operate an Emergency Assistance Program as it was in effect in September 30, 1995, [which] is allowable under Section 402 (a)(2) [of the Personal Responsibility and Work Opportunity Reconciliation Act].”

We asked a few States why they reported expenditures under Child Welfare Payments when their descriptions seemed to indicate that the activities were Child Welfare Services (see Table 22). We received a response from West Virginia stating that it agrees that it should have reported the expenditures as Child Welfare Services. However, the State was not able to re-submit the ACF-196(SUP) to correct this since the deadline for submission had passed.

Table 22		"Other" Child Welfare Payments
STATE	Expenditures	Description
ARKANSAS	\$69,575	Kinship Caregivers Services begin with a family support assessment to determine which services are needed mostly by each individual family... services range from stabilization, strengthening and preservation activities, after school activities, tutoring, literacy training and assistance with guardianship petitions for the kinship caregivers.
FLORIDA	\$5,119,323	Maintenance Adoption Subsidies
GEORGIA	\$18,852,187	The largest share of these expenditures related to payments to related caregivers to care for a child who has come into the custody of Georgia's Child Welfare system ("enhanced relative rate" in our terminology), who used to be in the custody of Georgia's Child Welfare system but have been released and are in the ongoing care of a related caregiver ("relative care subsidy" in our terminology), or who used to be in the custody of Georgia's Child Welfare system but have been released and are in a formal subsidized guardianship placement with a related caregiver ("subsidized guardianship" or "enhanced subsidized guardianship" in our terminology). Another expenditure relates to institutional care for children to deal with conditions and behaviors that keep them from living with their families (child care institutions). We also have expenditures related to a program called Community Integration that provides intensive support services to children and their families to support a placement move from the child back into the family setting. We have similar but less intensive services referred to as Permanency/reunification services that also assist children in moving back into family based placements.
KENTUCKY	\$2,868,068	Kinship Care One-time Payments, Kinship Care Family Initiatives, EBT Charges/JP Morgan
LOUISIANA	\$12,073,100	CW TANF is Child Protection and Family Services costs that meet criteria of serving low income families.
OKLAHOMA	\$2,317,957	Foster Care Clothing, Therapeutic Foster Care, Non-Title IV-E Foster Care (reflects Child Welfare services provided to keep families together or reunite them, such as prevention services).
SOUTH CAROLINA	\$3,395,220	Foster Care maintenance payments and associated costs
VIRGINIA	\$177,574	Financial Assistance, Community Action Grants. Services to at risk low income children, youth, and young adults. Programs include Head Start, financial literacy training, parenting skills training, and counseling.

Child Welfare Services

In order to capture separate expenditure data for child welfare activities that did not consist of payments, the ACF-196(SUP) form instructed States to report expenditures related to “in-home services, family preservation, child protective services, and adoption services” under the subcategory of Child Welfare Services.

Twenty-one States reported expenditures in Child Welfare Services. Total spending equaled \$209,108,931 or 23.8 percent of “other” non-assistance for April-June 2011. This was the

largest subcategory for “other” non-assistance. Expenditures ranged from \$59,385,157 in New York to \$33,317 in Oklahoma.

New York describes its expenditures reported under Child Welfare Services as “supports and services to TANF Eligible children and/or caregivers in Public Assistance ‘child-only’ cases (cases with no adult active on assistance). These cases are primarily children living with non-parent caregivers (usually a grandparent), but also included children living with an SSI parent and children living with ineligible alien parents. These services are designed to preserve families and promote self-sufficiency. This category also includes services for TANF eligible individuals that are intended to preserve families and reduce recidivism among youths and adults involved in the criminal justice system.”

Table 23		"Other Child Welfare Services"
STATE	Expenditures	Description
ALABAMA	\$2,685,758	Non-assistance expenditures for payment of specific services for department child welfare cases such as counseling, case management, peer support, childcare information and referral, transitional services or other non- recurrent, short-term benefits to meet a specific crisis situation that will not extend beyond four months. These include homemaker, child protection, family preservation and case management.
ARIZONA	\$30,325,785	Includes activities such as in-home services, family, preservation, child protective services, and adoption services.
ARKANSAS	\$1,557,863	Costs related to county worker activities related to Family Preservation, Child Protective Services, and in-home services.
CONNECTICUT	\$8,852,501	Case Management Services – services provided by DCF staff under the state’s Emergency Assistance program in effect on September 30, 1995, as well as a variety of home and community based services to families to address issues that may cause a child to be abused or neglected in an effort to allow a child to remain in his or her home. Treatment/Prevention of Child Abuse program - community-based prevention and treatment of child abuse
FLORIDA	\$51,375,034	Adoption services, protective investigations, protective investigation training, case management, community based care monitoring, healthy families, prevention services and protective services
GEORGIA	\$30,569,106	Services for integrated family support; preventive svc - TANF; Youth Villages, Inc; CWS - Community Integration; CWS PUP; Com children & family Assessment Wrap Around; Cognitively - Based Compassion
IDAHO	\$50,940	Expenditures are for Family Preservation Activities
ILLINOIS	\$873,057	Family Preservation: The client is a family who has been the subject of a founded case of abuse or neglect for which a determination has been made that the children can remain in the home with appropriate monitoring and services designed to help the parent(s) address the issues that brought the case to the attention of DCFS. Services provided are parent training, home visits, child care, transportation and court testimony.
INDIANA	\$6,274,287	Healthy Families Indiana Program. Voluntary home visitation program designed to promote healthy families and healthy children. No-cost services include child development, access to health care, parent education, family incentives, staff training and community coordination/education. Services can begin for eligible families either prior to the time of birth and can continue until the child is five years of age. TANF funds provide for families with incomes below 250% poverty level.
KANSAS	\$4,211,450	These expenditures represent Family Preservation, Community Funding and Emergency Shelter. Family Preservation: Family Preservation in-home services are intensive services offered to families who are at imminent risk of having a child come into the custody of SRS and removed from their home. These services assist the family in identifying and understanding the problems within the family that place a child at risk of out-of-home placement and assist them in finding ways to change how the family unit functions. Target Population: Family Preservation: Families who are at imminent risk of having a child come into the custody of SRS and removed from their home. Emergency Shelter: Emergency Shelter services were initiated in 1991 to help children avoid state custody and return to their families more quickly. Emergency shelters provide shelter for youth who are removed from their home by police. The grant funds the emergency needs of families to prevent removal of children from their homes and case supervision services to assist the family in managing a crisis situation so the family may remain together or be reunited more rapidly. Children served by emergency care agencies through this project include children referred by law enforcement, children who are served as voluntary placements (parental placements), and children who have been identified by community agencies of being at risk of entering the child welfare system. By providing services to families when they are first identified as having difficulties, custody can be avoided in most instances. Target Population: Families needing emergency services to prevent removal of children from their homes and families needing case supervision services to assist the family in managing a crisis situation so the family may remain together or be reunited more rapidly. Community Funding: The Community Services Program funds local collaborative efforts to provide services to children and their families to prevent unnecessary placements of children into Foster Care. These efforts are primarily directed at children who are safe from abuse and/or neglect by their care givers, but who need preventive services, either because of their own behaviors, or the parent’s need for support. These could be children with behavioral problems, truant, or children with serious medical or mental health needs. These services are designed to be provided by community providers to prevent SRS from becoming involved with the family through an abuse/neglect or non-abuse/neglect assessment. Target Population: Children and their families to prevent unnecessary placements of children into Foster Care.

Table 23		"Other Child Welfare Services
STATE	Expenditures	Description
MISSISSIPPI	\$834,697	Social Worker Provider Services administrative expenditures
NEBRASKA	\$1,137,013	The Nebraska Department of Health and Human Services is committed to developing and implementing a comprehensive statewide approach to providing child welfare and Juvenile services. These services are provided within statutory mandates while promoting and supporting community and family responsibility. Program protects children by assessing for safety and risk to the child, and by providing for necessary intervention, when indicated. It also helps to preserve families and enhance family strengths and functioning. Nebraska uses TANF funds used to provide services to children in home and those temporarily absent from the home. Temporary absence from the home is defined as up to 12 months with a reunification goal in the plan. Non-assistance services may include, but are not limited to: in-home safety services, home supported safety services, residential safety services, family engagement services, intensive family preservation, family support services, visitation supervision and monitoring, electronic monitoring, tracker services, drug screening and testing, and respite care. The Child Welfare Program provides services to families in abuse and neglect situations that allow the children to remain or return to the home.
NEW HAMPSHIRE	\$1,088,655	Cost of Child Protective Service Workers allocated to TANF as well as Child Welfare Ancillary Services claimed as non-recurrent benefits
NEW YORK	\$59,014,109	Provides supports and services to TANF eligible children and/or caregivers in Public Assistance "child-only" cases (cases with no adult active on assistance). These cases are primarily children living with non-parent caregivers (usually a grandparent), but also include children living with an SSI parent and children living with ineligible alien parents. These services are designed to preserve families and promote self-sufficiency. This category also includes services for TANF eligible individuals that are intended to preserve families and reduce recidivism among youths and adults involved in the criminal justice system.
NORTH CAROLINA	\$4,306,345	Services in this sub-category, funded with State MOE funds, include Child Protective Services and In-Home Services For Children Defined As Reasonable Candidates For Foster Care, Family Support and Reunification Services, Foster Care Services and related supportive services such as the provision of In-Home Aides, intake and case management, individual and family adjustment and representative payee services, and the purchase of goods and services to alleviate non-recurring, episodic events impacting the welfare of children.
OHIO	\$1,005,758	The Kinship Permanency Incentive Program (KPIP) was designed to promote permanency for a minor child in the legal and physical custody of a kinship caregiver. The program provides an initial one-time incentive payment to the kinship caregiver to defray the costs of initial placement of the minor child in the kinship caregiver's home.
OKLAHOMA	\$33,317	CFSD-Oklahoma Children's Service (reflects services provided to the percentage of children receiving out of home services, such as group homes and children's shelters).
SOUTH CAROLINA	\$647,994	In-home services, family preservation, child protective services
TEXAS	\$1,562,374	Family Based Safety Services
WISCONSIN	\$566,427	Kinship Care assessments. Grants for assessments to determine if there is a need for a child to be placed with the kinship care relative and if the placement with the relative is in the best interest of the child.
WYOMING	\$1,765,413	These expenditures are from our emergency assistance services provided through the child welfare services system(WYCAPS)

In our previous report, we mentioned that State descriptions in Child Welfare Payments seemed to indicate that the expenditures were related to Child Welfare Services, and vice versa. While some States, like Idaho, re-categorized expenditures previously reported as Child Welfare Payments in March as Child Welfare Services in April-June, confusion between these two subcategories seemed to occur again in some States. To better understand how States interpreted the activities reported under Child Welfare Payments, we asked Arkansas, Louisiana, New York, and Virginia why they chose to report certain expenditures as Child Welfare Payments instead of Child Welfare Services. Arkansas and Louisiana responded that upon review, it would have been more appropriate to report the expenditures as Child Welfare Services instead of Child Welfare Payments. New York was able to amend its report, shifting expenditures previously

reported as Child Welfare Payments to Child Welfare Services (as reflected in the description above).

We also questioned Connecticut's Child Welfare Services expenditures, which it describes as related to "Case Management Services – services provided by DCF staff under the State's Emergency Assistance (EA) program in effect on September 30, 1995, as well as a variety of home and community based services to families to address issues that may cause a child to be abused or neglected in an effort to allow a child to remain in his or her home." This description seemed to indicate that the expenditures are for programs authorized solely under prior law rather than non-assistance. After we questioned the State, it responded that "Case Management Services are in both the EA program and regular Non-Assistance program... The amount reported is correctly bucketed to line 1b [Child Welfare Services]."

Emergency Assistance

Under Emergency Assistance, States were instructed to report "activities to remedy emergency or unusual crisis situations such as clothing distributions, remedial care, information referral, counseling, securing family shelter, legal services, and any other services that meet needs attributable to such situations."

Twenty States reported expenditures for Emergency Assistance. Total spending equaled \$41,832,814, or 4.8 percent of "other" non-assistance for April-June 2011. Expenditures ranged from \$9,745,774 in Massachusetts to \$1,829 in Wisconsin.

Massachusetts described its expenditures in this subcategory as related to homelessness prevention, sheltering, and housing services. It described two programs: "Housing Search," which is "a short-term, supportive service whose goal is to find safe housing for the homeless" and "Housing Stabilization and Flexible Funds," which "offer rental assistance for up to 1 year." Both serve the same population.

Table 24		"Other" Emergency Assistance
STATE	Expenditures	Description
ALABAMA	\$3,577,226	Emergency Assistance program provides assistance for paying for shelter and other emergency living expenses and (non-assistance) services which include information and referral, case planning and management, counseling and other support activities to normalize family functioning to or on behalf of a needy child.
ARIZONA	\$5,113,116	Includes activities to remedy emergency or unusual crisis situations; particularly, provides emergency shelter and transitional housing supportive services to homeless individuals.
CONNECTICUT	\$150,751	Supportive Housing for Families - DSS provides supportive services for families participating in CT's Next Steps Supportive Housing Initiative. It is designed to create permanent, affordable service-supported housing opportunities for individuals and families who are homeless or at risk of becoming homeless, particularly people experiencing repeated or persistent homelessness. It enables homeless families and individuals to stabilize their lives and to regain a stake in the community. DSS provides scattered site or project-based rental assistance through the State Rental Assistance Program (no longer a TANF program). It provides TANF Separate State Program funding for the delivery of supportive services to families with special needs through annual contracts with projects that serve among the target populations, families with children aged 14 or younger that are/have: homeless or at imminent risk of homelessness and; have income less than seventy-five percent (75%) of state median income; headed by adults with multiple barriers to employment and housing stability, such as cognitive limitations, history of trauma, mental illness and/or chemical dependency; presently involved in the DCF system, either in protective services or voluntary services; and/or reuniting after DCF out-of-home placement.
DIST. OF COL.	\$211,082	To provide low-income families with emotional support, family resources, and referrals to community services to assist in accomplishing their self-sufficiency; homeless shelter assistance.
FLORIDA	\$87,366	Children legal services
GEORGIA	\$1,602,631	Assistance for Atlanta Community Food Bank
INDIANA	\$495,914	Emergency Assistance - provides shelter including out of home placement, non-medical counseling, clothing, and homemaker services; based on a substantiated complaint of child abuse or neglect, or a court adjudication of Child in Need of Services. The goal is to maintain children in the home of a relative or to provide safe, temporary alternative living arrangements while the family is working toward reunification. Services are authorized within 30 days of identification of need and can be authorized for up to 120 days. Provided for families with income up to 250% poverty level.
KENTUCKY	\$55,480	Safety net services
LOUISIANA	\$158,410	This program is designed to end the cycle of homelessness in Louisiana by providing services to homeless families which include but are not limited to comprehensive case management, educational and employment opportunities for adult participants, community referrals, life skill modules, housing options. Direct services that are provided in response to an episode of need or a specific crisis and are non-recurrent such as food, clothing, and shelter assistance, are not provided beyond four months.

Table 24		"Other" Emergency Assistance
STATE	Expenditures	Description
MASSACHUSETTS	\$9,745,774	The Division of Housing Stabilization (DHS), DHCD's newest unit, is charged with the mission of preventing homelessness, sheltering those for whom homelessness is unavoidable, and rapidly re-housing the homeless in stable, permanent housing. Housing Search and Housing Stabilization/Flexible Funds are programs within this unit. Housing Search (HS) is a short-term, supportive service whose goal is to find safe housing for the homeless. Housing Stabilization and Flexible Funds (FF) serve the same population as Housing Search. Additionally, if a person qualifies for Housing Stabilization, they are automatically enrolled in Flexible Funds. Housing Stabilization and Flexible Funds offer rental assistance for up to 1 year, therefore the programs do not exclusively provide short term services (less than 120 days).
MICHIGAN	\$3,371,335	Emergency Housing, utility shut-off prevention and home repairs to keep families in their homes.
NEW YORK	\$6,373,424	Services for TANF eligible families with children to deal with crisis situations threatening the family and meet emergent needs resulting from a sudden occurrence or set of circumstances demanding immediate attention. Also includes services that promote safe permanent housing and identify and address barriers to securing and maintaining safe, adequate housing.
NORTH CAROLINA	\$4,845	Services include Housing Subsidies That Do Not Meet Federal Definition of "Assistance which is rental or mortgage subsidies that are provided for fewer than 4 months, including emergency housing assistance, to Work First Family Assistance recipients or families with income at or below 200% of the federal poverty level who meet all eligibility requirements for that group.
OHIO	\$354,502	Emergency Assistance funds are designed to provide benefits and services that are not considered assistance in accordance with 45 CFR 260.31. The expenditures represent non-recurring short-term benefits designed to accomplish one of the four purposes of TANF by addressing supports needed by working families and by addressing the needs of families with barriers to self-sufficiency.
OKLAHOMA	\$521,127	Emergency Food Assistance
RHODE ISLAND	\$6,405,866	Helps children and families in emergency situations such loss of food, housing or parental support. Family less than 225% federal poverty level.
SOUTH CAROLINA	\$83,359	Family shelter, clothing distributions, remedial care, etc
UTAH	\$3,495,333	Services and volunteer hours to families that are in crisis. The service is associated with food distribution.
WEST VIRGINIA	\$23,444	clothing allowance for non-recipients of TANF Cash Assistance
WISCONSIN	\$1,829	Case management services for families receiving emergency assistance

Domestic Violence Services

According to instructions for the ACF-196(SUP) form, Domestic Violence Services include "activities such as information and referral services, short-term emergency shelter or transitional supportive housing for those leaving an abusive relationship, case management, counseling, investigations, and other protective services."

Fifteen States reported expenditures for Domestic Violence Services. Total spending equaled \$29,796,577, or 3.4 percent of "other" non-assistance for April-June 2011. Expenditures ranged from \$7,643,508 in California to \$40,097 in North Carolina.

California describes its expenditures as “community domestic violence services: group counseling; parenting skill training; independent living skill training, case management.”

Table 25		"Other" Domestic Violence Services
STATE	Expenditures	Description
ARIZONA	\$3,981,469	Includes activities such as information and referral services, short-term emergency shelter or transitional supportive housing for those leaving an abusive relationship, case management, counseling, investigations, and other protective services.
CALIFORNIA	\$7,643,508	Community domestic Violence Services: group counseling; parenting skill training; independent living skills training, case management.
COLORADO	\$123,219	Includes 24-hour emergency crisis intervention, info and referrals, short-term emergency shelter, case mgmt, counseling, advocacy and psycho-educational support
DIST. OF COL.	\$1,451,237	Provide domestic violence assistance; case management.
FLORIDA	\$1,305,772	Domestic Violence services such as prevention, crisis counseling, case management and training.
GEORGIA	\$5,051,400	Services for Family Violence Shelters - TANF; TANF Domestic Violence Prevention; Family Violence Shelter State
ILLINOIS	\$1,555,051	Services to victims of domestic violence and their children including shelter; hotlines; individual and group counseling; advocacy; information; referral; transportation; school prevention programs; public education, and professional training.
KANSAS	\$447,333	Domestic violence prevention services are offered as a voluntary program for TANF families receiving assistance from SRS. Advocates, employed by the local domestic violence and sexual assault organization, provide assistance to clients on a statewide basis. The service goal is safety and self-sufficiency. When receiving services, the advocates help with safety planning, shelter, support groups, counseling, court, economic advocacy, and goals related to work or training. Target Population: TANF adults who are victims of domestic violence and abuse.
NEVADA	\$92,081	Provide domestic violence services to pending and eligible TANF participants, targeting victims and their families.
NEW JERSEY	\$625,087	Funding for the Family Violence Option (FVO) provides the following services and supports to clients who self-disclose domestic violence: providing written and verbal information of the FVO initiative, screening individuals, referrals for assessment, counseling, intervention and supportive services.
NEW YORK	\$4,875,060	Enhancement of core services and/or optional services for TANF eligible individuals to promote self-sufficiency and safety from abuse, improving outreach and awareness. Services may include parenting programs, peer support, family counseling, and intensive case management.
NORTH CAROLINA	\$40,097	TANF Domestic Violence Case Management includes screening, and identification of victims, development of safety and service plans, counseling, referral to appropriate agencies, batterer's programs and support groups, determining the need for waivers for Work First program requirements and other direct services to clients that related to domestic violence.
OREGON	\$1,334,504	Temporary Assistance for Domestic Violence Survivors (TA-DVS) provides payments, not to exceed \$1,200 in a 90-day period, for services necessary to help victims of domestic violence become safe
SOUTH CAROLINA	\$603,915	Information and referral services, emergency shelter or transitional housing, counseling, etc
VIRGINIA	\$666,844	These expenditures support services to victims of domestic violence including access to shelters and other core services.

Mental Health and Addiction Services

On the ACF-196(SUP) form, expenditures related to “activities such as assessment, referral services, individual and group counseling, and residential treatment services” are reported under the subcategory of Mental Health and Addiction Services.

Fourteen States reported expenditures for Mental Health and Addiction Services. Total spending equaled \$51,410,513, or 5.9 percent of “other” non-assistance for April-June 2011. Expenditures ranged from \$41,743,468 in California to \$6,589 in North Carolina.

California described expenditures in this subcategory as “treatment services to Kids (CalWorks) program, [including] medical/mental health exam [and] group counseling.”

Table 26		"Other" Mental Health and Addiction Services
STATE	Expenditures	Description
ARIZONA	\$636,873	Provides non-medical substance abuse treatment services to those whose substance abuse is a significant barrier to maintaining or obtaining employment, and to parents, guardians or custodian whose substance abuse is a significant barrier to maintaining, preserving or reunifying the family.
CALIFORNIA	\$41,743,468	Treatment services to Kids (CalWorks) program: medical/mental health exam; group counseling.
COLORADO	\$60,621	Non-medical substance abuse.
FLORIDA	\$3,671,155	Community support services, treatment and after care services for adults, adolescents and children for mental health and substance abuse.
GEORGIA	\$87,069	Family Violence & Preventive - CPE
KANSAS	\$380,600	Provide screening, assessment, multi-disciplinary care management, and individualized care coordination to TAF customers with substance abuse problems. This includes working closely with the TAF case manager to determine when the customer is ready to participate in work program activities. Target Population: TANF adults who suffer from drug and alcohol addiction.
KENTUCKY	\$692,905	Substance Abuse.
NEVADA	\$52,556	Provide substance abuse evaluations and non-medical treatment/counseling to TANF eligible participants (custodial and non-custodial parents), targeting the pregnant and parenting population and individuals with more severe conditions.
NEW YORK	\$602,641	Wrap around services designed for TANF eligible individuals mandated to treatment to help individuals achieve sobriety, stability and self-sufficiency. Services may include parenting programs, peer support, family counseling, and intensive case management.
NORTH CAROLINA	\$6,589	These services include helping Work First participants and/or family members to obtain mental health or substance abuse services necessary to enable them to participate in Work First activities as specified in the Personal/Mutual Responsibility Contract including diagnostic and treatment services, admission to institutions and/or treatment programs as necessary, and referral to appropriate resources.
OKLAHOMA	\$27,892	Human Services Center/Substance Abuse Coordinator
OREGON	\$1,430,720	Addiction services are provided to both TANF and TANF at risk clients. These non-treatment services include Drug and Alcohol and other Addiction and Prevention Services.
SOUTH DAKOTA	\$42,031	Rehabilitation services of pregnant women with dependent(s), who have completed inpatient treatment.
WISCONSIN	\$1,975,393	Funds are used to provide community based AODA treatment programs for TANF eligible individuals

Education and Youth Programs

Under Education and Youth Programs, States were instructed to report “activities such as after-school and community-based programs for youth, school-related social services, and mentoring/tutoring programs.”

Eleven States reported expenditures for Education and Youth Programs. Total spending equaled \$34,004,208, or 3.9 percent of “other” non-assistance for April-June 2011. Expenditures ranged from \$11,557,111 in Georgia to \$138,605 in Montana.

Georgia listed numerous programs for which it allocated funds in this subcategory, including “Programs for out-of-school youth initiative; GA Alliance of Boys and Girls Club; State Dept of Ed Comm. Base Org; Afterschool Care - Level 2; Afterschool Service [for] TANF [Eligibles].” It did not provide descriptive detail of the activities involved in each program.

Table 27		"Other" Education and Youth Programs
STATE	Expenditures	Description
DIST. OF COL.	\$392,627	Provide social, recreational and educational services and activities to assist TANF recipients and low income individuals.
GEORGIA	\$11,557,111	Programs for out-of-school youth initiative; GA Alliance of Boys and Girls Club; State Dept of Ed Comm. Base Org; Afterschool Care - Level 2; Afterschool Service TANF Elig
ILLINOIS	\$1,443,983	Teen Reach (Teen Responsibility, Education, Achievement, Caring and Hope): Structured activities during non-school hours to help prevent involvement in gang activity, alcohol and substance abuse, sexual activity, teen pregnancy, and other problems facing teenagers. ISBE expenditures for the state free and reduced lunch program.
LOUISIANA	\$8,063,161	The Louisiana Department of Public Safety/Office of Youth Development (DPW/OYD) calculates and documents on a monthly basis those State general funds spent in the Community Supervision Program (CSP) that are not utilized as match or maintenance of effort for any federal funds and can be used as maintenance of effort on TANF-eligible families. This information is provided electronically to DCFS each month. DCFS, through a case validation computer file interface with DPS/OYD determines the number and/or proportion of its total active non-residential CSP cases that meet TANF MOE financial eligibility criteria. CSP provides services to youth and their families who are court ordered to utilize the services. Intake and assessments are completed, followed by client specific case plans. Services may include case management, counseling, in-home services, parenting education and training, supervision and non-residential youth programs.
MISSOURI	\$8,097,142	Pre-School Program provides funding to programs that prepare children prior to age in which they are eligible to enroll in kindergarten to enter school ready to learn. It promotes high quality early childhood education programs for children who are one or two years from kindergarten entry.
MONTANA	\$138,605	After-school and community based programs for youth, school-related social services, and mentoring/tutoring programs
NEW YORK	\$3,361,652	TANF Eligible services to increase the ability of young people to constructively function in the family unit, in school and in the workplace by increasing positive behaviors and reducing negative ones. Services designed to encourage youth to remain in school and improve attendance and grades through local interventions, including incentive programs. Services to support pregnancy prevention efforts. Services designed to preserve the family and reduce institutional placements for TANF eligible individuals.
NORTH CAROLINA	\$157,450	Child And Family Enrichment Services include services and activities provided for current Work First cash assistance families, or those that have gross income at or below 200% of the federal poverty guideline and meet other eligibility requirements, that enhance parents' and children's ability to become self-sufficient, properly care for children, and enhance school performance and behavior, self-esteem, leadership skills, and family relationships.
OHIO	\$249,292	Education & Training expenditures include any educational program provided to individuals who do not have a high school diploma or GED. Job skills training is designed to increase individuals' employability potential.
WISCONSIN	\$154,847	Funds are used for support services to low income children through statewide Boys and Girls clubs
WYOMING	\$388,338	These expenditures were to provide preschool programs for economically disadvantaged at-risk students.

Health/Disability Services

Health/Disability Services include “activities such as outreach to children for immunization, disability assessment and evaluation, vocational rehabilitation services, family service planning

for physical and developmental disabilities, respite care for caregivers of those with intellectual disabilities, and non-medical services to allow disabled children to remain in the home.”

Eleven States reported expenditures for Health/Disability Services. Total spending equaled \$18,232,901, or 2.1 percent of “other” non-assistance for April-June 2011. Expenditures ranged from \$7,751,568 in Indiana to \$104 in North Carolina.

Indiana described these expenditures as “‘Early Intervention/First Steps’ for infants, toddlers and their families [and] services for children 0-3 years who are developmentally vulnerable [that are] intended to prevent or minimize disabilities with the goal of maximizing the potential of these children so they can function as contributing members of society.” The State provides these services for families with income less than 250 percent of the poverty level.

Note that while TANF funds may not be used for medical services other than pre-pregnancy family planning services, there is no similar restriction on counting expenditures for medical services toward MOE (though a State may not count its State Medicaid match toward MOE requirements). Nevertheless, about 56 percent of the expenditures reported under Health/Disability Services were Federal TANF funds. Expenditures with Federal TANF funds under this subcategory were primarily reported by Texas, Virginia, and Oklahoma, and consisted of family support services designed to improve children’s health and development and overall family well-being, particularly for families with a disabled child in the home. As Texas’s description notes, these services may include “outreach to children for immunization, disability assessment and evaluation, vocational rehabilitation services, family service planning for physical and developmental disabilities, respite care for caregivers of those with intellectual disabilities, and non-medical services to allow disabled children to remain in the home.”

Table 28		"Other" Health/Disability Services
STATE	Expenditures	Description
COLORADO	\$14,356	Medical Services that cannot be paid by Medicaid, HIBI, and Federal TANF.
CONNECTICUT	\$289,984	The Department of Developmental Services administers respite care through DDS staff and through contracts with private providers. These services provide temporary out-of-home relief to families with children who are diagnosed with mental retardation. The purpose of providing temporary (e.g., one to seven days) out-of-home respite is to enable the family to re-energize, deal with emergency situations, or engage in activities that may be neglected as a result of the ongoing demands of caring for a family member who has mental retardation. The goal of the respite program is to support persons with mental retardation to live with their families in their communities. The program is available to family's with income less than seventy-five percent (75%) of the state's median income level for the family's size. Individual and Family Grant Program - Department of Developmental Services The Department of Developmental Services administers a program called the Individual and Family Grant program. This program makes grants to families that have children who are diagnosed with mental retardation. The purpose of the grants is to enable the families to purchase respite services. Families may also use the grant to purchase special equipment, or to pay for activities or emergencies. The respite services include in-home respite care and temporary out-of-home respite care. "Respite" provides time for the family to re-energize, deal with emergency situations, or engage in activities that may be neglected as a result of the ongoing demands of caring for a family member who has mental retardation. The goal of the program is to support persons with mental retardation to live with their families in their communities. Grants ranging from \$600 per year to \$1,000 per year, depending on need, are available to "needy families" with income less than seventy-five percent (75%) of the state's median income level for the family's size. In extraordinary circumstances, the maximum Individual and Family Grant payment per year is \$5,000. These grants do not represent 'basic income support' and therefore do not meet the criteria for "assistance."
INDIANA	\$7,751,568	Early Intervention/First Steps for infants, toddlers and their families. Services for children 0-3 years who are developmentally vulnerable intended to prevent or minimize disabilities with the goal of maximizing the potential of these children so they can function as contributing members of society. Services are authorized through the development of an individualized family service plan with the support of the child's primary care physician. Provided for families with income less than 250% poverty level.
LOUISIANA	\$982,010	This program serves low-income, first-time mothers by providing nurse home visitation services beginning in early pregnancy and continuing through the first two years of the child's life. First time mothers may enroll as early as possible during their pregnancy, through week 28 of their pregnancy. The goals of the program include, but are not limited to, improving child health and development and increasing the economic self-sufficiency for eligible participants. Examples of activities used to achieve these goals include, but are not limited to, engaging in activities centered on child development, parenting skills, developing a plan to continue the mother's education, and assisting in finding employment. Medical services are not provided.
MINNESOTA	\$62,535	This program provides medical assistance to recently arrived immigrants who are barred from the federal Medicaid program during their first 5 years of residence in the U.S. The purpose is to provide medical benefits to noncitizens so that adults can pursue employment and work activities and so children may be cared for in their homes. All recipients are MFIP participants.
NEVADA	\$774,982	Provide assistance to families with children to help them remain intact (family preservation). Includes financial assistance for respite care, in-home training, counseling, behavioral consultation and cash assistance to those who qualify.
NEW YORK	\$210,060	TANF eligible services to assist disabled clients and applicants in applying for federal disability benefits and/or appealing adverse decisions. Activities may include assistance in securing needed medical or other documentation that supports the client's condition and functioning, completing applications and accompanying clients to meetings or hearings.
NORTH CAROLINA	\$104	Medical Insurance Premiums: full or partial payment or subsidy of medical insurance premiums (through use of MOE funding) for Work First eligible families and or children, including the NC Health Choice for Children Program.
OKLAHOMA	\$1,432,820	DDSD Family Support, DDSD Community Services/TANF
TEXAS	\$3,589,534	Includes activities such as outreach to children for immunization, disability assessment and evaluation, vocational rehabilitation services, family service planning for physical and developmental disabilities, respite care for caregivers of those with intellectual disabilities, and non-medical services to allow disabled children to remain in the home.
VIRGINIA	\$3,124,948	Healthy Families Initiative. Goal of the program is to improve child health and development and reduce child abuse and neglect. The program begins during pregnancy or at birth, and focuses on improving the parent's ability to parent.

Teen Pregnancy/Prevention Programs

Under Teen Pregnancy/Prevention Programs, States were asked to report expenditures related to “activities such as family-planning, home-visiting services, and parenting education.”

Nine States reported expenditures for Teen Pregnancy/Prevention Programs. Total spending equaled \$12,962,053, or 1.5 percent of “other” non-assistance for April-June 2011.

Expenditures ranged from \$8,849,306 in California to \$207 in New York.

California stated that these expenditures related to “Cal-Learn case management [that] provide assistance on education, social and health services to teen; provide education plan; referrals to community services.”

Table 29		"Other" Teen Pregnancy/Prevention Programs
STATE	Expenditures	Description
CALIFORNIA	\$8,849,306	Cal-Learn case management: provide assistance on education, social and health services to teen; provide education plan; referrals to community services.
FLORIDA	\$40,000	Pregnancy prevention, abstinence education and family formation services.
ILLINOIS	\$2,529,698	Parents Too Soon: Counseling and other services for young parents, including counseling to help prevent further teen pregnancies, Teen Parent: Services which help parents under age 19 stay in school, develop parenting skills, become more self-sufficient and increase self-esteem. Healthy Families: Intensive home visiting to families at risk of child abuse or neglect, targeting new parents, and providing services designed to promote healthy child development, strengthen parent-child relationships, prevent further teen pregnancies, as well as coping with stress, and supporting parents as the child’s first teacher. DCFS Teen Parent Services.
KANSAS	\$77,238	These expenditures provide a comprehensive Teen Pregnancy Prevention Education program to at-risk youth. At risk youth are defined as individuals that come from a low income, high crime neighborhood. Services include: educate youth about relevant topics which include preventing teen pregnancy, healthy relationships, two-parent families, dating, contraceptives, internet safety, sexting, self-esteem, career explorations, job training and community services. Target Population: At risk youth
MINNESOTA	\$37,794	Teen Pregnancy sub-recipient contract
MISSISSIPPI	\$13,557	Teen Pregnancy sub-recipient contract
NEVADA	\$41,073	To support more aggressive enforcement of statutory rape laws in Nevada and to promote prevention of statutory rape, therefore reducing teen pregnancies, domestic violence, and sexual exploitation of children.
NEW YORK	\$207	Family Planning Education is a voluntary program that provides education and preventive services to help youth and families. Private visits in the home or in an office provide participants education, information, support and referrals related to reproductive health. An Outreach Educator will also provide district staff with training in regard to the program and teach staff how to make a referral and what to expect from the Family Planning Education Service.
UTAH	\$1,373,180	Home visitation for families with newborns to council on care & family planning.

Early Childhood Care and Education

The subcategory of Early Childhood Care and Education includes “activities such as pre-K, Head Start/Early Head Start, other school readiness programs, and early childhood home visitation.”

Fourteen States reported expenditures for Early Childhood Care and Education. Total spending equaled \$97,695,198, or 11.1 percent of “other” non-assistance for April-June 2011.

Expenditures ranged from \$27,135,935 in Texas to \$400 in New York.

Texas describes its expenditures in this subcategory simply as “Pre-Kindergarten care and education.”

Table 30		"Other" Early Childhood Care and Education
STATE	Expenditures	Description
ALABAMA	\$2,808,075	Pre-K Early childhood education programs managed by Department of Children's Affairs. Designed to provide assistance to needy families throughout state for child day care to enable parents to find employment or receive training.
COLORADO	\$279,117	Random moment sampling for program administration for TANF eligible child care services.
CONNECTICUT	\$18,025,860	School Readiness - State Department of Education The initiative is designed to ensure that children from low-income families have access to high-quality early learning experiences by combining the strengths and resources of the public and private child care and school systems. Funds are made available to School Readiness Councils in communities with large numbers of low-income children. The Councils assess community needs, identify gaps, and allocate funds. Each Council is allocated funds to increase the number of 3- and 4-year old children served in early care and education programs and to improve the quality of those services. The Councils are required to ensure that full-day early childhood care and education services are available year-round. Additionally, funds are made available on a statewide basis to train new early childhood teachers. These services are offered on behalf of families with a gross income less than seventy-five percent (75%) of the State Median Income (SMI).
IDAHO	\$270,112	Expenditures are for Head Start activities.
ILLINOIS	\$7,894,046	ISBE expenditures for the Early Childhood and Extended Learning/Summer Bridges.
KANSAS	\$654,060	The Kansas Early Head Start Program provides early intervention to enhance children's development during their formative years, enables parents to be better caretakers and teachers to their children, and helps parents meet their own goals, including economic independence. Comprehensive services available to program participants include: weekly home visits, physical and mental health education, nutrition education, social services, parental involvement and education, services for children with disabilities, job seeking and retention support, and child care for parents who are working or are attending school or job training. The Head Start Collaboration Office within SRS strives to improve the coordination of policies and initiatives among early childhood programs within the state. Kansas Early Head Start grants are awarded to 13 early learning programs in 48 counties serving 1,117 children from birth to four, and their families. Target Population: Children and their parents in families generally below the poverty level.
MASSACHUSETTS	\$640,325	Administrative costs associated with expenditures on various child care programs. Child care programs are managed by the Department of Early Education and Care.
MINNESOTA	\$1,425,000	Head Start [MN Statutes 119A.50] Head Start is a federal and state funded child and family development program, helping low income families become self-reliant while also helping prepare their children for school success.
NEW YORK	\$400	A project that provided \$200 to licensed child care providers for the purchase of educational materials for low-income children in child-care.
OHIO	\$46,762	The expenditures in this category promote health, learning and child safety for children from birth to three years of age. Early learning initiatives are included in this category.
OREGON	\$2,072,842	Pre-Kindergarten education through the Oregon Department of Education provides state-funded Oregon Head Start PreKindergarten (OHS PreK) services for clients. Ten percent of enrollment is reserved for children with disabilities.
SOUTH CAROLINA	\$22,059,555	Pre-K, CPE's, SC Dept of Education
TENNESSEE	\$14,383,109	Pre-K
TEXAS	\$27,135,935	Pre-Kindergarten care and education

Employment Services and Work Supports

According to ACF-196(SUP) instructions, States were to report expenditures related to “activities such as employment preparation and work supports (e.g., transportation services and purchase of tools, uniforms, or work clothes)” under Employment Services and Work Supports.

Twelve States reported expenditures for Employment Services and Work Supports. Total spending equaled \$17,549,917, or 2.0 percent of “other” non-assistance for April-June 2011. Expenditures ranged from \$7,923,771 in Ohio to \$677 in California.

Ohio’s expenditures were related to “The State of Ohio Works First Program, [which] requires participants to engage in work activities based on a Self-Sufficiency Contract when the assistance group contains an adult or minor head-of-household. The programs encourage employment while it meets temporary needs through the provision of cash assistance. Subsidized employment is also provided to some participants in the program.”

Table 31		"Other" Employment Services and Work Supports
STATE	Expenditures	Description
ALABAMA	\$361,511	A welfare work program which included subsidized payments to employers who hired JOBS clients.
ARIZONA	\$223,602	Provides payment to vendors to perform activities such as employment preparation and job assessments.
CALIFORNIA	\$677	Welfare-to-Work Supportive Services: grants & loans assistance.
DIST. OF COL.	\$357,849	Services and support rendered to D.C. fathers including GED/ABE prep., employment readiness training & placement, emergency food and clothing distribution, legal aid, etc. provide training and other services to aid IMA clients who are participating in the TANF Employment Program develop effective communication, conflict resolution skills.
GEORGIA	\$5,257,114	Community Svcs - TANF Eligible C
KENTUCKY	\$315,052	2 Parent Family Formation
NEW YORK	\$2,274,069	A specialized approach to maximizing receipt of work supports/transitional benefits such as Food Stamps, Medicaid, EITC, and other non-assistance services for TANF eligible low income families. This may include special units that provide case management for employed individuals, outreach efforts and promotional campaigns to increase the participation in these programs aimed at increasing family stability through maximizing available assets (income/resources) to support family economic stability.
NORTH CAROLINA	\$67,896	Other Supportive Services include services provided to assist Work First participants in meeting the conditions of the Mutual Responsibility Agreement and to maintain and strengthen the family unit, including services provided by qualified paraprofessionals, providing assistance with home management tasks, providing transportation, and preparing individuals for participant groups.
OHIO	\$7,923,771	The State of Ohio Works First Program requires participants to engage in work activities based on a Self-Sufficiency Contract when the assistance group contains an adult or minor head-of-household. The program encourages employment while it meets temporary needs through the provision of cash assistance. Subsidized employment is also provided to some participants in the program.
OKLAHOMA	\$77,558	Faith Based Activities, Life Skills-Maranatha
WISCONSIN	\$124,694	Assistance to W-2 participants in completing SSI/SSDI applications and supporting documentation; Provision of supportive services to W-2 participants for communications with the federal Social Security Administration (SSA) Communications and meetings with SSA or DDB regarding SSI/SSDI applications for W-2 participants; Case management or any other services specifically and directly related to supporting SSI/SSDI applications by W-2 participants. Assistance to W-2 participants in appealing denied SSI/SSDI applications and the subsequent follow-up services for the appeal Assistance to W-2 participants in requesting reconsideration on denied SSI/SSDI applications and the subsequent follow-up.
WYOMING	\$566,124	\$347,107.00 of these expenditures were for the TANF/CPI program which is the Community Partnership Initiative with the county commissioners. \$219,017.00 of these expenditures were the administration of the Employment and Training Self-Sufficiency Program.

Marriage and Parenting Initiatives

Expenditures for Marriage and Parenting Initiatives related to “activities such as life-skills education, peer-group instruction, and parenting workshops.”

Ten States reported expenditures for Marriage and Parenting Initiatives. Total spending equaled \$5,847,692 or 0.7 percent of “other” non-assistance for April-June 2011. Expenditures ranged from \$3,928,959 in Michigan to \$5,000 in D.C.

Michigan describes these expenditures simply as “Families First services” but does not provide a more specific explanation of the activities involved.

Table 32		"Other" Marriage and Parenting Initiatives	
STATE	Expenditures	Description	
COLORADO	\$20,362	Marriage and family services.	
DIST. OF COL.	\$5,000	Helping families with male involvement, mentoring.	
FLORIDA	\$7,448	Foster parent and adoption (perspective) parents training.	
MICHIGAN	\$3,928,959	Families First services	
NEW MEXICO	\$1,170,107	The contractor for NMSU is to provide family formation services to eligible families in accordance with the TANF purpose of "encouraging the formation of two parent families." The contractor provides parenting skills, support on furthering education and job retention, increasing father involvement, and providing reform and awareness to parents on incentives in providing for their children.	
NEW YORK	\$32,938	Services aimed at the health and well-being of TANF eligible infants/children by promoting positive parenting skills and parent-child interaction, optimal prenatal care and child health and development. Home visits are often part of the larger programs that have a case management component. Home visiting identifies barriers to self-sufficiency not easily uncovered in an office setting.	
OKLAHOMA	\$82,545	Court Appointed Special Advocates (CASA), Family Start Services, Family Support-Family Start OHM	
SOUTH CAROLINA	\$457,107	Activities under this category include promoting responsible parenting through counseling, mentoring, and skills-based parenting education; and fostering economic stability through job search, job training, job retention, and subsidized employment.	
TEXAS	\$111,541	Healthy Marriage Programs	
WYOMING	\$31,685	These expenditures were for the Father Factor program which provides services to fathers for increased involvement in children’s lives.	

Child Support

According to instructions provided by HHS, Child Support expenditures related to “activities such as child support supplemental payments and other services not covered by the State’s IV-D plan or reimbursed by IV-D.”

Six States reported expenditures for Child Support. Total spending equaled \$3,857,299, or 0.4 percent of “other” non-assistance for April-June 2011, the lowest out of all subcategories for “other” non-assistance. Expenditures ranged from \$2,632,099 in Tennessee to \$82,212 in Idaho.

Tennessee stated that these expenditures are related to its child support pass-through in TANF.

Table 33		"Other" Child Support
STATE	Expenditures	Description
CALIFORNIA	\$148,172	Child/Spousal support disregard: prepare and authorize payments; prepare any required notices and response to client inquiries about the disregard payment.
IDAHO	\$82,212	Expenditures are for processing Receiving Services Only (RSO) child support payments
MINNESOTA	\$422,923	Child Support Pass Through TANF
MONTANA	\$161,292	Child Support Supplemental payments
TENNESSEE	\$2,632,099	Child Support Pass thru
WISCONSIN	\$410,601	Grants to local agencies for the purpose of providing support services to unemployed or under employed non-custodial parents who are behind in their child support payments. Participation requires a court order.

Adult/Postsecondary Education

On the ACF-196(SUP) form, expenditures related to Adult/Postsecondary Education include “activities such as scholarship programs, tuition payments, college tutoring services, and adult basic education programs.”

Five States reported expenditures for Adult/Postsecondary Education. Total spending equaled \$47,187,788, or 5.4 percent of “other” non-assistance for April-June 2011. Expenditures ranged from \$39,286,593 in Massachusetts to \$18,154 in New York.

Massachusetts reported that these expenditures are all related to “The Scholarship Reserve,” [which] provides financial assistance to Massachusetts students enrolled in and pursuing a

program of higher education in any approved public or independent college, university, school of nursing, or any other approved institution furnishing a program of higher education. The scholarship program covers a portion of the total cost of tuition and others costs associated with attending the institution. These costs include all related expenses such as room and board, health insurance, travel expenses, personal expenses. The expenditures documented in this claim have been reasonably calculated to include only the cost of attending courses and pursuing higher educational attainment.”

Table 34		"Other" Adult/Postsecondary Education
STATE	Expenditures	Description
ILLINOIS	\$262,168	DHS Scholarship Program: Provides TANF and other low income students whose annual income is below 200% of the federal poverty level and have minor children additional funding to reduce or eliminate barriers to their successfully obtaining a college degree and employment. Funding can be used for tuition, required fees, books, campus housing, university sponsored meal plans.
LOUISIANA	\$742,274	The Louisiana Office of Student Financial Assistance (LOSFA) provides a report to DCFS on a quarterly basis, the State general fund expenditures made for the Louisiana Go Grant for the purposes of allowing DCFS to determine whether those expenditures can be used for maintenance-of-effort (MOE). The Louisiana Go Grant is a need based student financial grant that supports nontraditional and low income students in their pursuit of postsecondary education. To receive the Go Grant, a student must be receiving a federal Pell grant and have remaining financial need.
MASSACHUSETTS	\$39,286,593	The Scholarship Reserve provides financial assistance to Massachusetts students enrolled in and pursuing a program of higher education in any approved public or independent college, university, school of nursing, or any other approved institution furnishing a program of higher education. The scholarship program covers a portion of the total cost of tuition and others costs associated with attending the institution. These costs include all related expenses such as room and board, health insurance, travel expenses, personal expenses. The expenditures documented in this claim have been reasonably calculated to include only the cost of attending courses and pursuing higher educational attainment. (\$14,800,000) The University of Massachusetts provides needs-based financial assistance to Massachusetts students enrolled in and pursuing a program of higher education at one of the UMass locations: Boston, Lowell, Worcester, Amherst, or Dartmouth. The scholarship program covers the cost of tuition for courses as well as the standard costs associated with attending school. (\$24,486,593)
NEW YORK	\$18,154	The goal of the program is to develop and implement a welfare-to-work project that links educational opportunities to internships and job placements. The program affords participants the opportunity to earn their two-year degree or a baccalaureate degree, thereby greatly increasing their chances of gaining permanent, full-time employment at a sustainable salary level.
SOUTH CAROLINA	\$6,878,599	CPE's, State Commission on Higher Education

TANF Program Expenses

The subcategory of TANF Program Expenses related to “program management and related expenditures.”

Twenty-two States reported expenditures for TANF Program Expenses. Total spending equaled \$187,340,185 or 21.3 percent of “other” non-assistance for April-June 2011. Expenditures ranged from \$70,389,583 in California to \$2,656 in North Carolina.

California reported that this subcategory includes, “TANF program management and related expenditures including Fraud prevention; quality control, case management, other services and related overhead (operating costs).”

When reviewing the descriptions for TANF Program Expenses, we noted that some of the expenditures were related to activities that fit into the definition of “administrative costs,”²⁵ which a State should report under Administration (line 6.j.) on the ACF-196.²⁶ We asked States with descriptions for TANF Program Expenses that indicated that administrative costs were reported as “other” non-assistance to explain why they did not report these expenditures as

²⁵ 45 CFR 263.0(b) states that the term ‘administrative costs’ “means costs necessary for the proper administration of the TANF program or separate State programs. (1) It excludes direct costs of providing program services. (i) For example, it excludes costs of providing diversion benefits and services, providing program information to clients, screening and assessments, development of employability plans, work activities, post-employment services, work supports, and case management. It also excludes costs for contracts devoted entirely to such activities. (ii) It excludes the salaries and benefits costs for staff providing program services and the direct administrative costs associated with providing the services, such as the costs for supplies, equipment, travel, postage, utilities, rental of office space and maintenance of office space. (2) It includes costs for general administration and coordination of these programs, including contract costs and all indirect (or overhead) costs. Examples of administrative costs include: (i) Salaries and benefits of staff performing administrative and coordination functions; (ii) Activities related to eligibility determinations; (iii) Preparation of program plans, budgets, and schedules; (iv) Monitoring of programs and projects; (v) Fraud and abuse units; (vi) Procurement activities; (vii) Public relations; (viii) Services related to accounting, litigation, audits, management of property, payroll, and personnel; (ix) Costs for the goods and services required for administration of the program such as the costs for supplies, equipment, travel, postage, utilities, and rental of office space and maintenance of office space, provided that such costs are not excluded as a direct administrative cost for providing program services under paragraph (b)(1) of this section; (x) Travel costs incurred for official business and not excluded as a direct administrative cost for providing program services under paragraph (b)(1) of this section; (xi) Management information systems not related to the tracking and monitoring of TANF requirements (e.g., for a personnel and payroll system for State staff); and (xii) Preparing reports and other documents.”

²⁶ A State is subject to a misuse of funds penalty if the amount reported under Administration exceeds 15 percent of its State Family Assistance Grant, as per 45 CFR 263.13(a).

“Administration” instead. For example, Ohio’s description of TANF Program Expenses states that “Program expenditures include but are not limited to eligibility determination, case management activities, and purchased service contracts.” Since the definition for “administrative costs” at 45 CFR 263.0(b) includes “Activities related to eligibility determinations,” we asked the State why it reported such expenditures under “Other” (line 6.m.) on the ACF-196 as opposed to “Administration” (line 6.j.). Ohio responded that in fact, “eligibility and other allowable administrative costs such as AS&T (administrative support and technical) activities are reported as administrative costs described in 45 CFR 263.0(b). The State of Ohio did not claim any eligibility determination costs to ‘other.’ All eligibility costs were and are claimed to ‘administration.’”

We also asked California about its description, particularly with respect to “fraud prevention and quality control.” The State responded that “The costs that are currently reported under line 6.m. [‘Other’] are direct costs associated with case management, other services and related operating payments such as costs of space, costs that were purchased rather than provided by the county, salaries and benefits for support staff performing activities in direct support of a program. In addition, line 6.m. includes eligible costs associated with the expenditures of funds from the Fraud Incentive Allocation provided the counties by [California Department of Social Services]. Since the incentive allocation is issued and tracked separately from the CalWORKs allocation and these costs are not necessarily benefits that are designed to meet ongoing basic needs or supportive services provided to families who are not employed, we have reported these costs under the ‘other’ ‘non-assistance’ category.” Since fraud and abuse prevention activities are included within the definition of “administrative costs,” it seems as if the expenditures related to California’s “Fraud Incentive Allocation” should be reported under “Administration” (line 6.j.) on the ACF-196 instead of “Other” (line 6.m.).

Colorado, which described the expenditures reported under TANF Program Expenses simply as “Program administration,” changed its description to “Random moment sampling of TANF County level program administration for caseworkers who have direct contact with clients” after we requested additional information. Finally, Nevada clarified its description of “Program management and related expenditures” included “such things as salaries and benefits for

TANF Employment Services workers and direct administrative costs associated with providing TANF services such as costs for supplies, utilities, and rental and maintenance of office space.”

Table 35		"Other" TANF Program Expenses
STATE	Expenditures	Description
ALABAMA	\$49,206	Includes costs of contract to verify alien applicant employment history and alien status (SAVE) and cost of contract to delivery of assistance through Electronic Benefit issuance (EBT).
ARIZONA	\$1,724,625	Program management and other related expenditures made by the State on behalf of the tribes.
CALIFORNIA	\$70,389,583	TANF program management and related expenditures including Fraud prevention; quality control, case management, other services and related overhead (operating costs).
COLORADO	\$26,059,719	Random moment sampling of TANF County level program administration for caseworkers who have direct contact with clients.
CONNECTICUT	\$2,137,194	Expenses related to administering the Child Care Subsidy program.
FLORIDA	\$6,323,590	Support staff of legal, Interstate Compact of Placement of Children, office staff who develop and implement policy, provide coordination and technical assistance for planning and implementation of community based care partners.
GEORGIA	\$565,767	Program expenses for Athens Technical College; Technical College System of GA CON
IDAHO	\$62,379	Expenditures are part of the tribal contracts.
ILLINOIS	\$1,009,692	Program management and related expenditures.
KENTUCKY	\$6,045,955	Total Expenses for quarter.
LOUISIANA	\$440,006	The FITAP/STEP Case Management Worker is responsible for ongoing case management for families who are striving toward becoming employed and moving toward self-sufficiency. This includes but is not limited to the following: Completing the Family Success Agreement on certified FITAP families. Contacting the client to monitor progress. Following up with providers and employers. Arranging supportive services, including child care and transportation. Authorizing payment for all supportive services. Being knowledgeable about local or community resources, including educational and employment opportunities. Updating the Family Success Agreement or its Addendum. Ongoing assessment, follow-up, and problem resolution. Providing referrals to help meet the client's needs. Identifying innovative service solutions. Sanctioning clients who do not meet the STEP requirements. Entering participation hours on JAS.
MICHIGAN	\$25,887,115	Case management work and related costs from local office workers
NEVADA	\$4,714,737	Program management and related expenditures.
NEW HAMPSHIRE	\$41,261	Cost of supporting services to former TANF clients who are employed and in need of services to retain employment
NEW YORK	\$107,851	Provides training to district staff and contract agencies. Services may include administrative oversight to improve effectiveness of TANF eligible programs.
NORTH CAROLINA	\$2,656	Work First Housing Expenditures – Other Than Housing Subsidies include costs, other than subsidies, used to provide housing assistance to Work First cash assistance families, or those that have gross income at or below 200% of the federal poverty guideline and meet other eligibility requirements, including staff time for a housing coordinator, housing/financial counseling, costs associated with operation of housing pilot programs, and contracts with non-profits to provide housing assistance.
OHIO	\$28,639,018	Program expenditures include but are not limited to eligibility determination, case management activities, and purchased service contracts.
OKLAHOMA	\$896,492	TANF-Work-Family Support Stepdowns, TANF Work-County, TANF Work-FO/FSSD County Offices
OREGON	\$11,509,817	Direct costs of providing TANF program services including the costs of staff providing the services and the direct administrative costs of providing the services.
TENNESSEE	\$120,569	One contract with an in-state university to provide longitudinal study, customer service study, and staff training. One contract with an in-state university to prepare a case characteristic profile of the caseload of the Families First Program.
VIRGINIA	\$77,161	TANF program management and related expenses. Indirect costs allocated to support program.
WEST VIRGINIA	\$535,792	Program management

Additional Expenditures

For expenditures that did not fit any of the predetermined subcategories, the ACF-196(SUP) provided additional rows so that States were able to list these additional expenditures.

Twenty-four States reported expenditures for additional expenditures. This category totaled \$77,284,364 representing 8.8 percent of “other” non-assistance for April-June 2011.

The largest activity reported by a State under Additional Expenditures was New York’s case management services, which it describes as, “Activities involved with planning, linking, counseling, and monitoring/evaluating the client and/or family's position in achieving self-sufficiency. Examples of these activities are assessing current needs and evaluating services to prescribe, referring for services, setting and discussing client goals, discussing and evaluating education and work histories, work goals and achievements, training received and needed, household situation, and family personal and health issues which could affect employability [*sic*], housing/living arrangements, and transportation, etc.” The State allocated over \$11 million for case management for April-June 2011 and included these expenditures in the Additional Expenditures category.

There also were some subcategories of additional expenditures reported frequently by States that accounted for significant expenditures. With expenditures totaling over \$20 million, as reported by Hawaii, Illinois, and Utah, the most prominent activity reported under Additional Expenditures was for medical services. Over half of these expenditures were for Hawaii’s “Medical expenditures for adult citizens of Compact of Free Association (COFA) States.” Homelessness prevention and housing services also were frequently reported under Additional Expenditures; three States—Illinois, New York, and Oregon—reported these services as Additional Expenditures, totaling \$3.8 million. Furthermore, State MOE funds provided by California, Oklahoma, and Montana to Tribes totaled over \$5 million; this large figure is predominately due to California’s allocation of over \$4.8 million to its State’s Tribal TANF programs. Finally, two States—New York and Montana—reported expenditures for nutritional assistance and food bank services under Additional Expenditures, but expenditures totaled just \$202,378. While the subcategories listed on the ACF-196(SUP) were admittedly non-exhaustive

(since TANF and MOE funds may be expended on a large array of activities), this perhaps signifies the need for additional predetermined subcategories that were not considered.

At the same time, in many cases, States listed items that could have been included under other subcategories listed on the ACF-196(SUP) form. For example, Oklahoma included contracted domestic violence and sexual assault programs, despite the availability of the subcategory specifically for these services (line 1.d.); and Oregon and Puerto Rico listed expenditures related to programs that could have been included under Child Welfare Services (line 1.b.), i.e., child abuse and neglect prevention and child protective services, respectively.

Furthermore, Connecticut's description of additional expenditures indicated that the related expenditures include activities "authorized solely under prior law" subcategories; the State's description for Additional Expenditures included "investigations provided by DCF staff under the State's Emergency Assistance program in effect on September 30, 1995. Investigations of reports of child abuse and neglect to prevent or eliminate the need for removal of children from their homes in cases where a removal has not occurred but such a removal is a reasonable possibility in the absence of preventive services."

Other States listed additional expenditures that also seem to fit in line items provided on the ACF-196 reporting form. For example, Louisiana included its State's Earned Income Credit and the refundable portion of the Child Care Credit under additional expenditures on the ACF-196(SUP), while it could include the related expenditures under the subcategories, Refundable Earned Income Tax Credits (line 6.e.) and Other Refundable Tax Credits (line 6.f.), on the ACF-196.

As noted above, the presence of an "other" or "additional expenditures" subcategory highlights the ambiguity associated with some predetermined subcategories, as well as the flexibility States have in listing one type of expenditure in more than one category, depending on how it views the activity or purpose of the expenditure. This results in an inability to accurately analyze aggregate data in any one subcategory, and compare expenditures among States and across years.

Table 36		"Other" Additional Expenditures (1)
STATE	Expenditures	Description
CALIFORNIA	\$4,804,914	TANF Funded Tribal MOE. (note: Expenditure data represents 12 of 15 Tribal TANF programs. Tribes not reported: CTT Partnership, Morongo, Torres Martinez)
COLORADO	\$38,417	Non-assistance supportive services for certain qualified aliens.
CONNECTICUT	\$13,437,629	Outreach - Department of Social Services These services include activities that provide information about TANF and related services or programs for which low income families might be eligible, including Medicaid and SCHIP. Investigations - investigations provided by DCF staff under the state's Emergency Assistance program in effect on September 30, 1995. Investigations of reports of child abuse and neglect, to prevent or eliminate the need for removal of children from their homes in cases where a removal has not occurred but such a removal is a reasonable possibility in the absence of preventive services.
FLORIDA	\$209,154	State Policy Board Costs
HAWAII	\$10,205,840	Medical expenditures for adult citizens of Compact of Free Association States. The medical services provided through State funds are identified in the QUEST Expanded Medicaid Section 1115 Demonstration.
ILLINOIS	\$108,133	Children's Place: A program that delivers specialized services to children and families in the Chicago area impacted by HIV/AIDS including residential, family supportive services, HIV respite nursery services and foster care, Illinois State Board of Education:
KANSAS	\$1,056,812	This category represents regional staff whose work is program related and not eligibility or administration. These expenditures chiefly represent the direct service staff for employment services. Target Population: TANF adults engaged in work activities.
KENTUCKY	\$144,047	Family Alternatives Administration
LOUISIANA	\$2,680,790	Services provided through contracts to provide public awareness, education, and targeted outreach strategies regarding the benefits of claiming the Earned Income Tax Credit (EITC) program and state tax credit programs, and free taxpayer assistance to EITC-eligible families and to provide financial literacy to families receiving services through the program. The Louisiana Department of Revenue (LDR) reports the Louisiana Earned Income Credit (LA EIC) and the refundable portion of the Child Care Credit. LDR reports for each filer claiming either of these tax credits the amount claimed for each credit and the total tax liability before the application of any other refundable credits. This report is used to determine the combined state dollars associated with LA EIC credits for Louisiana filers with at least one dependent and the refundable portion of the Child Care Credit before the application of any other refundable credits. The sum of the combined value of these allowable credits that exceeds State income tax liability prior to application of all other refundable credits is applied to Maintenance of Effort (MOE) funding requirements for TANF.
MICHIGAN	\$4,740,510	Family Support Subsidies: A subsidy to meet the special needs of children with severe developmental disabilities above normal needs.
MONTANA	\$267,707	State Funded Tribal MOE - Tribal Cash Assistance (Benefits)
NEBRASKA	\$67,848	Respite Service for Children - The Nebraska Department of Health and Human Services, Office of Home and Community-Based Services offers respite service to caregivers who need a temporary break from care giving so they can come back refreshed and ready to provide good care again. Respite service pays someone to come into the home, take care of a child with disabilities or special needs, and give the primary caregiver a temporary break. This would include adult children caring for siblings with disabilities or special needs and parents of children with disabilities or special needs. This program pays for respite services (someone to come into the home to care for a child with a disability or special needs to give the primary caregiver a temporary break). It is for people who are not receiving the service from another government program. Caregivers who need a temporary break from providing care to persons of any age with special needs. Examples of special needs are developmental and physical limitations, emotional or behavioral disorders, chronic illness, Alzheimer's disease and related health concerns, or persons at risk of abuse and neglect. This program provides services so that children may remain in the home.
NEVADA	\$166,951	TANF Loan program provides a monthly payment designed to meet the family's needs until an anticipated future source of income is received.
NEW HAMPSHIRE	\$15,528	Cost of the Eligibility Workers and Supervisors that allocate to TANF
NEW YORK	\$11,078,749	Case Management- Activities involved with planning, linking, counseling and monitoring/evaluating the client and/or family's position in achieving self-sufficiency. Examples of these activities are: assessing current needs and evaluating services to prescribe, referring for services; setting and discussing client goals, discussing and evaluating: education and work histories, work goals and achievements, training received and needed, household situation, and family personal and health issues which could affect employability, housing/living arrangements, and transportation, etc.
NORTH DAKOTA	\$29,794	All activities related to the assessment, contract development and information referral services, including JOBS activities as required for individuals receiving TANF assistance
OKLAHOMA	\$46,172	HSC-Faith Based Activities
OREGON	\$250,000	Housing - The Housing Stabilization Program is administered by Housing and Community Services. Homeless Assistance Services payments, not to exceed \$7,200, can be made to Community Action Agencies for case management services and assistance in housing costs.
PUERTO RICO	\$3,405,449	Child Protection Program- Investigation of suspected child abuse and neglect to day of removal.
RHODE ISLAND	\$700,000	RIW workers. Case management.
SOUTH DAKOTA	\$92,749	Bright start - education and life course development for pregnant women.
TEXAS	\$1,280,000	Programs providing alternatives to abortion
UTAH	\$3,241,529	Cost of medical care to eligible family members by a non-profit health care institution.
WASHINGTON	\$1,614,982	State law requires the transfer of a fair and equitable amount of state maintenance of effort funds to Tribal TANF programs once they are approved by the federal Department of Health and Human Services [Ref. RCW 74.08A.040(4)]

Table 37	"Other" Additional Expenditures (2)	
STATE	Expenditures	Description
COLORADO	\$58,753	Miscellaneous services for Colorado Works other supportive services, non-assistance.
ILLINOIS	\$6,672,768	Department of Healthcare & Family Services: Medical services for families, such as for immigrant children, that are not covered by Title XIX or Title XXI.
MICHIGAN	\$118,388	Information and Referral Services: Services related to families including translation and referral services to aid in accessing a variety of TANF services.
MONTANA	\$187,378	Food Bank - Purchase food commodities, distribute food commodities to TANF eligible families and administrative cost.
NEW YORK	\$11,597	Financial Literacy- Services designed to promote economic independence through enhanced knowledge of the skills needed to make informed and effective decisions through increased knowledge of personal finances.
OKLAHOMA	\$24,544	Tribal TANF-Osage Commitment
OREGON	\$571,591	Family Support and Connections - Family Support and Connections is a child abuse prevention program serving primarily TANF eligible families. Services include front-end support and interventions to TANF or at risk families to provide supports that will reduce the likelihood of later entry into foster care.

Table 38	"Other" Additional Expenditures (3)	
STATE	Expenditures	Description
COLORADO	\$2,164,842	Non-assistance supportive services for refugees.
ILLINOIS	\$598,041	Homeless Services: Funding for meals, shelter and supportive and prevention services to non-profit organizations that serve homeless families and families at risk of becoming homeless, including overnight shelters, transitional shelters and emergency shelters.
MICHIGAN	\$80,035	Services related to adoption.
MONTANA	\$116,816	Children's Basis Coverage - Supporting and strengthening the families ability to work through family stabilization and unification efforts.
NEW YORK	\$1,313,057	Supportive Housing for Families and Young Adults- The program provides supportive housing residents with services that include employment services, pregnancy prevention, parenting skills and life skills development, and educational assistance.
OKLAHOMA	\$12,945	Marriage Initiative-Retreat 10% State Share
OREGON	\$70,090	Refugee - Refugee Services are provided to TANF eligible families including refugees and asylees residing in Multnomah, Clackamas and Washington Counties and receiving social services through the Refugee Assistance program structure. The services provided include case management and employment and training services provided by local refugee agencies during the first eight months after arrival in the United States.

Table 39		"Other" Additional Expenditures (4)	
STATE	Expenditures	Description	
COLORADO	\$1,220,894	Grants to communities and other governmental entities to deliver an array of services to TANF eligible populations.	
NEW YORK	\$222,619	Homelessness Prevention Program (HPP)-to prevent the eviction of at-risk families referred to the contractor by the New York City Human Resources Administration (HRA) or the Housing Courts, by obtaining suitable permanent housing for such families. Served families must be receiving, or be eligible to receive, services under the State Plan for the TANF Block Grant and may have income that does not exceed 200 % of the federal poverty level, provided that services to such persons does no constitute "assistance" under federal regulations.	
OKLAHOMA	\$397,464	Regents	

Table 40		"Other" Additional Expenditures (5)	
STATE	Expenditures	Description	
COLORADO	\$69,719	Evaluation costs of the SSUF program.	
NEW YORK	\$15,000	Nutrition- Sevices designed to help families supplement their food budgets and enable healthy food choices and increased nutrition.	
OKLAHOMA	\$1,777,032	Pre-K Certification	

Table 41		"Other" Additional Expenditures (6)	
STATE	Expenditures	Description	
NEW YORK	\$1,459,587	Supplemental Homelessness Intervention Program- housing location and eviction prevention services to TANF eligible households that are homeless or at risk of becoming homeless. This program also increases housing stability and self-sufficiency through the provision of supportive services (employment services, parenting skills and life skills development, and educational assistance), intervention services, and relocation assistance.	
OKLAHOMA	\$437,500	Certified Attorney General-Contracted Domestic Violence and Sexual Assault Programs regarding 8190 TANF Eligible Clients Served	

Assistance and Non-Assistance “Authorized Solely Under Prior Law”

Nationally, States reported a total of \$327,701,820 for assistance and non-assistance "authorized solely under prior law," ranging from \$74,205,983 in Texas to \$105,055 in Michigan. A total of 25 States reported expenditures for assistance and non-assistance "authorized solely under prior law." Nineteen of these States reported expenditures only in one subcategory, while six States reported expenditures in two subcategories.

Chart 4 shows total expenditures by subcategory (including the percentage distribution), while Chart 5 conveys the number of States that reported expenditures in each subcategory. Note that only Federal funding, which includes TANF block grant funds, contingency funds, and ARRA emergency contingency funds, may be expended on programs “authorized solely under prior law.” MOE funds cannot be spent in this category.

Chart 4: Expenditures for Assistance and Non-Assistance "Authorized Solely Under Prior Law," April-June 2011

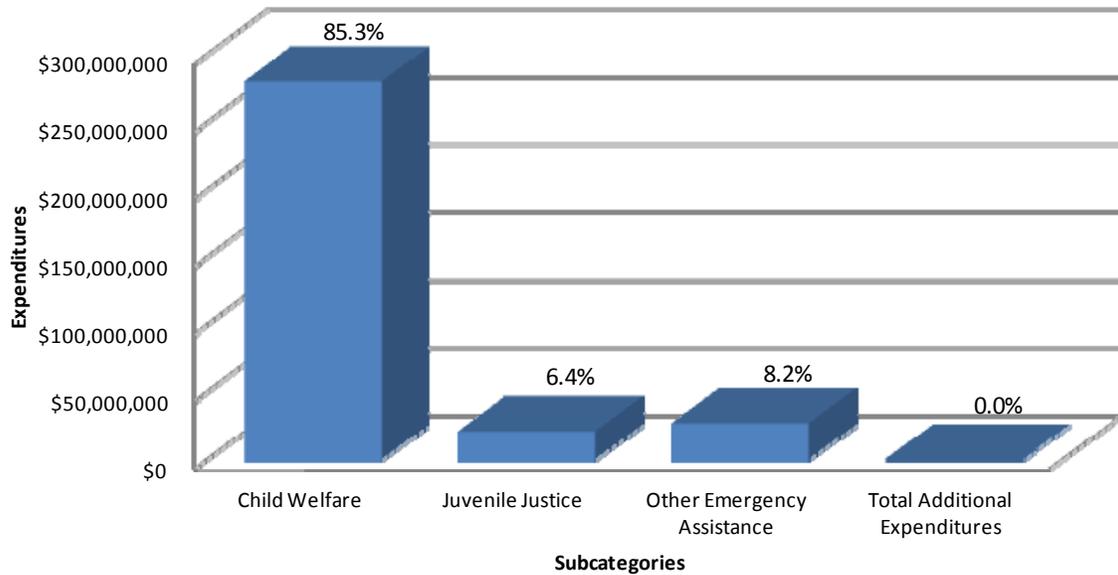


Chart 5: Number of States Reporting Expenditures for Assistance and Non-Assistance "Authorized Solely Under Prior Law," by Subcategory

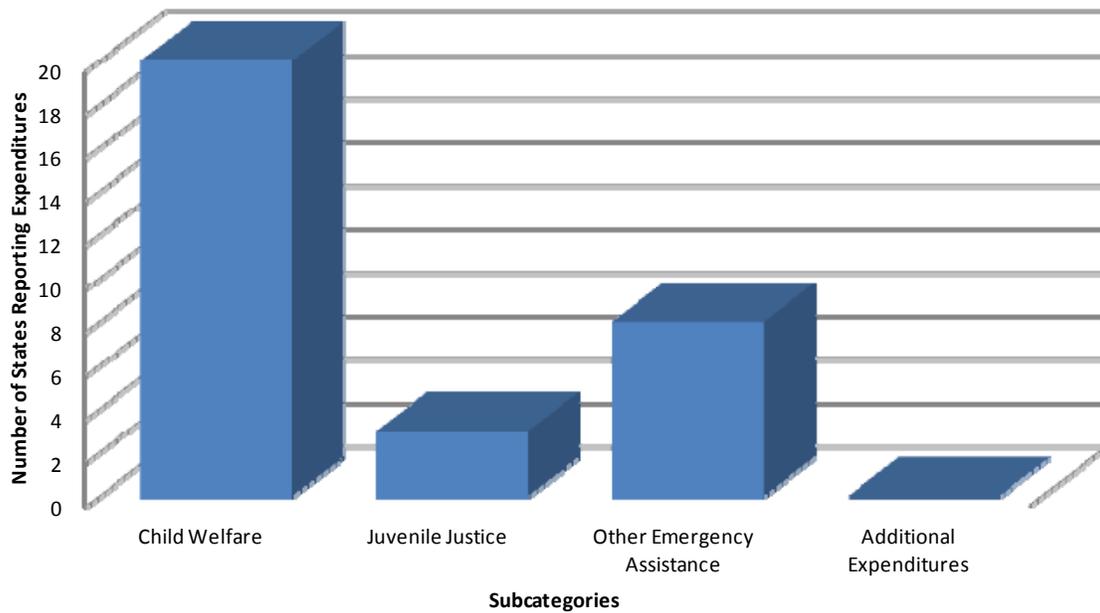


Table 42 below summarizes expenditures in each State by subcategory.

Table: 42					
Expenditures for Assistance and Non-Assistance "Authorized Solely Under Prior Law" by Subcategory and State, April-June 2011					
STATE	Total Assistance and Non-Assistance "Authorized Solely Under Prior Law"	Child Welfare	Juvenile Justice	Other Emergency Assistance	Total Additional Expenditures:
UNITED STATES	\$327,701,820	\$279,628,827	\$21,078,860	\$26,994,133	\$0
ALABAMA	\$0	\$0	\$0	\$0	\$0
ALASKA	\$0	\$0	\$0	\$0	\$0
ARIZONA	\$9,463,186	\$0	\$0	\$9,463,186	\$0
ARKANSAS	\$0	\$0	\$0	\$0	\$0
CALIFORNIA	\$74,205,983	\$62,185,520	\$0	\$12,020,463	\$0
COLORADO	\$116,301	\$116,301	\$0	\$0	\$0
CONNECTICUT	\$4,479,136	\$1,061,289	\$0	\$3,417,847	\$0
DELAWARE	\$0	\$0	\$0	\$0	\$0
DIST. OF COL.	\$0	\$0	\$0	\$0	\$0
FLORIDA	\$0	\$0	\$0	\$0	\$0
GEORGIA	\$10,820,407	\$10,820,407	\$0	\$0	\$0
GUAM	\$0	\$0	\$0	\$0	\$0
HAWAII	\$4,528,776	\$4,528,776	\$0	\$0	\$0
IDAHO	\$2,294,510	\$2,294,510	\$0	\$0	\$0
ILLINOIS	\$59,650,001	\$59,650,001	\$0	\$0	\$0
INDIANA	\$0	\$0	\$0	\$0	\$0
IOWA	\$0	\$0	\$0	\$0	\$0
KANSAS	\$3,642,385	\$3,642,385	\$0	\$0	\$0
KENTUCKY	\$0	\$0	\$0	\$0	\$0
LOUISIANA	\$0	\$0	\$0	\$0	\$0
MAINE	\$307,117	\$0	\$0	\$307,117	\$0
MARYLAND	\$0	\$0	\$0	\$0	\$0
MASSACHUSETTS	\$0	\$0	\$0	\$0	\$0
MICHIGAN	\$105,055	\$0	\$0	\$105,055	\$0
MINNESOTA	\$0	\$0	\$0	\$0	\$0
MISSISSIPPI	\$0	\$0	\$0	\$0	\$0
MISSOURI	\$12,511,732	\$10,412,940	\$2,098,792	\$0	\$0
MONTANA	\$902,340	\$0	\$0	\$902,340	\$0
NEBRASKA	\$0	\$0	\$0	\$0	\$0
NEVADA	\$1,385,502	\$1,385,502	\$0	\$0	\$0
NEW HAMPSHIRE	\$1,595,328	\$614,120	\$981,208	\$0	\$0
NEW JERSEY	\$0	\$0	\$0	\$0	\$0
NEW MEXICO	\$0	\$0	\$0	\$0	\$0
NEW YORK	\$17,998,860	\$0	\$17,998,860	\$0	\$0
NORTH CAROLINA	\$15,227,473	\$15,227,473	\$0	\$0	\$0
NORTH DAKOTA	\$1,039,364	\$1,039,364	\$0	\$0	\$0
OHIO	\$0	\$0	\$0	\$0	\$0
OKLAHOMA	\$2,141,572	\$2,141,572	\$0	\$0	\$0
OREGON	\$3,436,579	\$3,436,579	\$0	\$0	\$0
PENNSYLVANIA	\$25,780,862	\$25,649,867	\$0	\$130,995	\$0
PUERTO RICO	\$0	\$0	\$0	\$0	\$0
RHODE ISLAND	\$0	\$0	\$0	\$0	\$0
SOUTH CAROLINA	\$0	\$0	\$0	\$0	\$0
SOUTH DAKOTA	\$1,787,476	\$1,140,346	\$0	\$647,130	\$0
TENNESSEE	\$0	\$0	\$0	\$0	\$0
TEXAS	\$69,280,162	\$69,280,162	\$0	\$0	\$0
UTAH	\$0	\$0	\$0	\$0	\$0
VERMONT	\$307,534	\$307,534	\$0	\$0	\$0
VIRGIN ISLANDS	\$0	\$0	\$0	\$0	\$0
VIRGINIA	\$0	\$0	\$0	\$0	\$0
WASHINGTON	\$0	\$0	\$0	\$0	\$0
WEST VIRGINIA	\$4,694,179	\$4,694,179	\$0	\$0	\$0
WISCONSIN	\$0	\$0	\$0	\$0	\$0
WYOMING	\$0	\$0	\$0	\$0	\$0

All expenditures reported in any of the subcategories listed under assistance and non-assistance “authorized solely under prior law” are related to services as covered in the former AFDC or Emergency Assistance plans.

An analysis of the expenditures reported under the assistance and non-assistance “authorized solely under prior law” subcategories is provided below in the order listed on the ACF-196(SUP). As some of the descriptions quoted below highlight, activities “authorized solely under prior law” may overlap in more than one subcategory, and are not easily broken down and distinguishable (e.g., emergency assistance to children and families in emergency situations, such as families in foster care, were classified as Child Welfare in one State and Emergency Assistance in another).

Child Welfare

Twenty States reported expenditures for Child Welfare activities “authorized solely under prior law.” Total spending equaled \$279,628,827, or 85.3 percent of assistance or non-assistance “authorized solely under prior law” for April-June 2011. This was the largest subcategory of assistance or non-assistance “authorized solely under prior law.” Expenditures ranged from \$69,280,162 in Texas to \$116,301 in Colorado.

Texas reported its expenditures were related to “Emergency Assistance to Needy Families with children (including foster care) and services provided to meet emergency situations.”

In order to gain an understanding of the activities reported in this subcategory, we asked some States why they report certain activities as Child Welfare authorized solely under prior law and not under another the TANF program (e.g. Child Welfare Payments or Child Welfare Services). We were particularly interested in this because the descriptions of the expenditures provided in Part 2 of the ACF-196(SUP) seemed to indicate that the activity was allowable under TANF, i.e., it met one of the purposes of TANF (see Child Welfare Payments and Services section above for list of child welfare activities for which States may allocate TANF funds). Many States responded by referencing 45 CFR section 263.11(2), which allows that States may use TANF funds for activities for “which the State was authorized to use IV-A or IV-F funds under prior

law, as in effect on September 30, 1995 (or, at the option of the State, August 21, 1996)”; they stated that these expenditures have always been reported in this manner. A few States indicated that the activities actually do not meet one of the four TANF purposes and therefore cannot be claimed under the TANF program. For example, West Virginia, which described the activities in this subcategory simply as “foster care services” stated, “these services do not meet the four TANF purposes defined in 45 CFR section 260.20,” but did not provide further detail explaining why this is the case. Others explained that these expenditures were not made on behalf of TANF- eligible families. For instance, Oklahoma and Kansas stated that the services described involve children who are in out-of-home placements, i.e., not living with a parent or caretaker relative, which is a requirement for TANF assistance, as defined at 45 CFR 260.31(a), and for an expenditure that meets either purpose 1 or 2 of TANF.²⁷

²⁷ The four purposes of TANF are found at Section 401(a)(1) of the Social Security Act and 45 CFR 260.20. They are: (1) provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives; (2) end the dependence of needy parents on government benefits by promoting job preparation, work, and marriage; (3) prevent and reduce the incidence of out-of-wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies; and (4) encourage the formation and maintenance of two-parent families.

Table 43		Child Welfare "Authorized Solely Under Prior Law"
STATE	Expenditures	Description
CALIFORNIA	\$62,185,520	Cost associated with the Child Welfare Services Emergency Assistance program; complete the EA-ER application; emergency response training; emergency referrals; report or referral alleging abuse, neglect or exploitation of children; implement Differential Response; emergency hotline response activities.
COLORADO	\$116,301	Family Preservation activities.
CONNECTICUT	\$1,061,289	Emergency Assistance Foster Care Maintenance Months 5-12 – Department Of Children and Families Connecticut provides foster care maintenance to children who are in the custody of the Department of Children and Families (DCF). TANF covers the portion of the maintenance services that were authorized under the prior Emergency Assistance (EAF) program for clients who would have qualified for Emergency Assistance under that prior program. Benefits are funded by TANF for up to twelve months of care. Benefits for less than five months are non-assistance benefits.
GEORGIA	\$10,820,407	Foster/Adoptive Recruitment; OCP Legal Services. CPS; Grandparents Raising Grandchildren, Initial TANF Family Foster Care; TANF SFC per diem waiver; Homestead TANF/State; Parent Aid TANF; Cop Child and Family Assessment; OCP Initial Supervised; CCI Unbundled IFC TANF 607; Supervised Family Foster Care
HAWAII	\$4,528,776	As "authorized solely under prior law" [the former Emergency Assistance (EA) plan], Hawaii continues to use federal TANF funds to provide a variety of child welfare services and assistance to children at risk of abuse, neglect or abandonment, if threat of harm exists and EA is needed to maintain the child safely in the home, the child is at risk of harm and continuation in the home is not in the child's best interest, or the child is at risk of removal from the home due to a parent or relative's inability to provide needed care and supervision. The following services and benefits are limited to a maximum duration of one year or less as necessary to alleviate the emergency. Benefits and services for families and children to prevent out of home placement or facilitate reunification include: eligibility determination, counseling, supervision, shelter, food and other household or maintenance expenses for the child to remain in or return to the home; emergency shelter and group home (child caring facility), including basic living essentials (e.g. food, clothing, maintenance, supervision) unless receiving Title IV-E; necessary medical care unless the child is covered by Title XIX; and assistance provided to meet the emergency situation and other related items. These provisions were included in Attachment 3-A, under 45 CFR 233.120, transmitted under TR# 95-AFDC-1 on February 1, 1995, approved by Mr. Dennis Winter, Program Manager, ACF Region IX on May 4, 1995, with an effective date of January 1, 1995.
IDAHO	\$2,294,510	Expenditures are for training, school district family welfare and preservation activities
ILLINOIS	\$59,650,001	The costs from DCFs represent the TANF eligibility determination and the effort to establish abuse and neglect and determine that further services are required by DCFs for the child. DCFs costs involve the screening, assessment and investigation activity for the TANF case.
KANSAS	\$3,642,385	This section includes the TANF expenditures authorized by the Kansas; Emergency Assistance Plan under Sec 404(a)(2). The plan was approved April 4, 1996, and became effective July 1, 1995. The services authorized under this plan include: - Shelter care, foster family care, kinship care, or group residential care for children - Emergency shelter - Rental assistance - Adaptation of client residence - Emergency utilities, home repair, home furnishings, and clothing - Other goods and services to meet emergent family needs - Case management, counseling, therapy, in-home intensive family services, parenting education, household management training, family support and development services, child care and respite care, and any other social services necessary to alleviate an emergent situation and maintain a child in the home Target Population: Children not eligible for Title IV-E Foster Care funding and who are below the Kansas median income.
MISSOURI	\$10,412,940	Emergency assistance program that covers Child welfare services previously provided under Missouri's AFDC plan as of Sept 30, 1995. Services described in TN# AP-94-1 dated 9/04/04.
NEVADA	\$1,385,502	Child protective services - intake, assessment, case management, in-home services, and substitute care. Funded through TANF State Plan, Section 12, effective February 1, 2011.
NEW HAMPSHIRE	\$614,120	Cost of Child Welfare Out of Home Placements
NORTH CAROLINA	\$15,227,473	Services in this sub-category, funded with Federal TANF funds, include Adoption Services, Child Protective Services and In-Home Services For Children Defined As Reasonable Candidates For Foster Care, Family Support, Preservation, Intensive Preservation and Reunification Services, Foster Care Services, Personal and Family Counseling, In-Home Aide Services (multiple Levels) and related supportive services such as, intake and case management, individual and family adjustment, paraprofessional and representative payee services, and the purchase of goods and services to alleviate non-recurring, episodic events impacting the welfare of children.
NORTH DAKOTA	\$1,039,364	TANF resources are used for emergency assistance to needy families with children who are eligible for emergency assistance under the approved North Dakota AFDC State Plan as of September 20, 1996. Emergency assistance is limited to children who are in a situation where a court has determined that a continued presence in their home is not in their best interest and will be limited to direct assistance for maintenance payments for foster family care or group/residential care including all food, clothing, and supervision. Non assistance expenses consisting of foster care case management, court related expenses, and child abuse neglect investigations are also included.
OKLAHOMA	\$2,141,572	CFSD-Children's Shelter, CFSD Social Services Contract, TANF Emergency
OREGON	\$3,436,579	Child Welfare programs include non-IV-E Foster Care, Adoption Assistance, in-home services, family treatment and support services, family resources and support, tribal child welfare, special contracts, case management and on-going family preservation services to support maintaining the child in their own home or a home of a relative, or reunification of the family in a timely manner. Eligibility is the same as that found in the State Emergency Assistance Plan that was in effect as of September 30, 1995.
PENNSYLVANIA	\$25,649,867	Home help, home care skills and child care and supervision provided to a child and the child's family in the child's home by a trained homemaker or caretaker.
SOUTH DAKOTA	\$1,140,346	To meet emergency situations such as State Foster Care payments or Residential Group Care for children who have been placed in custody or placement and care, or guardianship.
TEXAS	\$69,280,162	Emergency Assistance to Needy Families with Children (including Foster Care) and services provided to meet emergency situations.
VERMONT	\$307,534	These are expenditures we use to cover social worker investigations and the FSD management costs associated with that.
WEST VIRGINIA	\$4,694,179	foster care services

Juvenile Justice

Three States reported expenditures for Juvenile Justice activities “authorized solely under prior law.” Total spending equaled \$21,078,860, or 6.4 percent of assistance or non-assistance “authorized solely under prior law” for April-June 2011. Expenditures ranged from \$17,998,860 in New York to \$981,208 in New Hampshire.

New York describes these expenditures as “Emergency Assistance to Needy Families (EAF) foster care services paid on behalf of Juvenile Delinquents and Person in Need of Supervision (JD/PINS). Also includes payment for the care, maintenance, supervision and tuition of EAF JD/PINS who are placed in residential programs operated by authorized agencies. Juvenile Justice activities are pursuant to New York’s TANF State Plan, sections iv and xxv: ‘TANF funds may be used for foster care maintenance, tuition and related services and juvenile justice services, including alternatives to detention and community reinvestment, for persons placed pursuant to Articles 3, 7, and 10 of the Family Court Act and for voluntary placement and child protective services and preventive services including determined eligibility thereof, to the same extent as such activities were authorized under the State’s Emergency assistance program as of September 30, 1995.’ And ‘The FA program will include a component entitled Emergency Assistance to Needy Families (EAF). EAF may be provided for aid, care, foster care tuition and services other than care and maintenance, preventive services, child protective services, and other services to meet the emergency needs of a child or the household.’” New York reported 100 percent of its assistance and non-assistance “authorized solely under prior law” in this subcategory.

Table 44		Juvenile Justice "Authorized Solely Under Prior Law"
STATE	Expenditures	Description
MISSOURI	\$2,098,792	Emergency assistance program that covers Juvenile Justice services previously provided under Missouri's AFDC plan as of Sept 30, 1995. Services described in TN# AP-94-1 dated 9/04/04.
NEW HAMPSHIRE	\$981,208	Cost of Juvenile Justice Out of Home Placements and Ancillary Services
NEW YORK	\$17,998,860	Emergency Assistance to Needy Families (EAF) foster care services paid on behalf of Juvenile Delinquents and Person in Need of Supervision (JD/PINS). Also includes payment for the care, maintenance, supervision and tuition of EAF JF/PINS who are placed in residential programs operated by authorized agencies. Juvenile Justice activities are pursuant to New York's TANF State Plan, sections iv and xxv: "TANF funds may be used for foster care maintenance, tuition and related services and juvenile justice services, including alternatives to detention and community reinvestment, for persons placed pursuant to Articles 3, 7, and 10 of the Family Court Act and for voluntary placement and child protective services and preventive services including determined eligibility thereof, to the same extent as such activities were authorized under the State's Emergency assistance program as of September 30, 1995." And "The FA program will include a component entitled Emergency Assistance to Needy Families (EAF). EAF may be provided for aid, care, foster care tuition and services other than care and maintenance, preventive services, child protective services, and other services to meet the emergency needs of a child or the household..."

Other Emergency Assistance

Eight States reported expenditures for Other Emergency Assistance "authorized solely under prior law." Total spending equaled \$26,994,133, or 8.2 percent of assistance or non-assistance "authorized solely under prior law" for April-June 2011. Expenditures ranged from \$12,020,463 in California to \$105,055 in Michigan.

California describes its expenditures for Other Emergency Assistance "Cost associated with Emergency Assistance (EA) Foster Care (FC) programs [which] provides benefits and services to children & families in emergency situations, with eligibility restricted to once in a 12-month period. Individuals may be provided services that were previously funded through IV-A on September 1995."

Table 45		Other Emergency Assistance "Authorized Solely Under Prior Law"
STATE	Expenditures	Description
ARIZONA	\$9,463,186	Previously authorized expenditures by the Emergency Assistance Program, effective 8/21/96. To date, these services have consisted of providing the basic needs of children who are in out-of-home placement due to abuse or neglect. This is referred to as foster care maintenance costs, per section V of the Arizona State Plan.
CALIFORNIA	\$12,020,463	Cost associated with Emergency Assistance (EA) Foster Care (FC) programs: provides benefits and services to children & families in emergency situations, with eligibility restricted to once in a 12-month period. Individuals may be provided services that were previously funded through IV-A on September 1995.
CONNECTICUT	\$3,417,847	Case Management Services – services provided by DCF staff under the state's Emergency Assistance program in effect on September 30, 1995, as well as a variety of home and community based services to families to address issues that may cause a child to be abused or neglected in an effort to allow a child to remain in his or her home.
MAINE	\$307,117	Annual voucher payment program to resolve a family (w/ child under 21) emergency. Each family can only be helped once in a 12-month period. This program includes 5 emergency categories which are: disaster assistance, repair/replacement of critical equipment or systems, emergency housing needs, utility disconnection relief, and special medical equipment and clothing.
MICHIGAN	\$105,055	Indigent burials
MONTANA	\$902,340	Benefit and administrative cost to deliver services as authorized solely under prior law.
PENNSYLVANIA	\$130,995	Emergency shelter service in a residential service facility.
SOUTH DAKOTA	\$647,130	Education and related service for children under care of state.

Additional Expenditures

The ACF-196(SUP) provided additional rows so that States were able to list additional expenditures that did not fit any of the predetermined subcategories. However, no States reported expenditures in this subcategory.

RECOMMENDATIONS FOR ENGAGEMENT AND FINANCIAL DATA REPORTING

The Claims Resolution Act specified that this report to Congress should include a discussion of “recommendations for such administrative or legislative changes as the Secretary determines are necessary to require eligible States to report the information on a recurring basis.” The data collection requirements relating to work participation raise somewhat distinct issues from those relating to financial reporting. Both are discussed below.

With respect to work participation data collection, HHS lacks the administrative authority to require the Claims Resolution Act data on an ongoing basis without statutory change, in light of the restrictions posed by Section 417 of the Social Security Act. Accordingly, any change to require such data on a permanent basis would need to be authorized by Congress.

When Congress considers legislation to reauthorize TANF, it may wish to consider issues related to engagement data reporting in conjunction with consideration of which activities should count toward the participation requirements and for what periods of time, whether individuals participating for some hours should partially count toward participation rates, and what information should be collected about individuals not counting toward participation rates and under what circumstances. Moreover, consideration should be given to a broader set of questions about which outcomes should be tracked for States and families, and the data collection needed to have a clearer picture of progress toward sustained employment and self-sufficiency, and of child and family well-being.

If Congress does determine to add additional engagement-related reporting, HHS recommends that reporting be integrated with existing participation requirements so that States are reporting in a single system, with one set of time frames for data submission. For example, additional ongoing reporting should synchronize with the data reporting currently required of States (e.g., reporting on a quarterly basis), and States should be allowed to use the same sample as the one used for current work participation rate calculations, as the new reporting requirements would provide more detail about who is not in the numerator of the sample caseload.

Finally, any data reporting requirements should include a reasonable time period for States to collect and report data. In particular, State engagement reports often noted challenges involved in changing data systems to collect new data elements, citing the need for a reasonable period for

reprogramming and training staff. In addition, the reports noted that one advantage of the existing TANF data collection approach was the ability to update and correct data, particularly related to the timely verification of hours of participation

With respect to financial data, HHS originally established the current categories for financial reporting in FY 1999, and they have not been modified since that time. It would be possible to make some revisions to the categories through modification of existing reporting categories, either administratively or through legislative directive. Based on the analysis of the March and April-June reporting data, HHS intends to develop new reporting categories that break out the current categories of “other” non-assistance and assistance and non-assistance “authorized solely under prior law.”

HHS also plans to revise the instructions for completing the ACF-196 reporting form. Specifically, we will require additional narratives from States in connection with reporting in order to gain a better understanding of the specific activities that are related to the expenditures. Having this set of descriptions of activities will be particularly useful when it comes to understanding what is reported under the “other” category that will surely be included in a revised financial data reporting form.

Revisions to the ACF-196 instructions also will include definitions for each expenditure category so that States clearly understand where to report expenditures related to certain activities. This will help reduce the instances where States simply report expenditures as “other” because they fail to recognize that another category may be more appropriate; for example, we know from the Claims Resolution Act data collection that expenditures for teen pregnancy prevention were sometimes classified as “other” even though there is a dedicated reporting category on the ACF-196 for these activities. HHS will write definitions so that categories are discrete; for example, a State will be able to understand where to report an expenditure that is both a non-recurrent short-term benefit and a work support. HHS will conduct trainings for States on the changes and require that States that do not properly complete the form revise and re-submit it so expenditures are reported in the appropriate categories. Clarifying the instructions in this manner will result in better consistency in reporting among States, allowing for better comparisons of the amount of spending in each category.