

# Publication of Summary and Analysis of Data from Wisconsin's ACF 812 Report for April, May and June 2011

## Executive Summary

Below is a table with Wisconsin's April, May and June 2011 work participation rate and the work participation rates for the sample drawn for the ACF 812 report for the same period.

**Table 1: Comparison of Full Caseload Work Participation Rate to Sample Work Participation Rate**

Month	Full Caseload Work Participation Rate	Sample Work Participation Rate
April 2011	36.1%	37.7%
May 2011	36.4%	34.2%
June 2011	33.7%	37.6%

The data from the ACF 812 report provides insight into the high level of engagement of Wisconsin Works (W-2) participants.

This analysis shows that of the cases that are not already meeting the work participation rate or disregarded from the rate:

- Wisconsin is engaging the majority of the work eligible individuals in some activities. 86% in April and June had assigned activities and 90% in May had assigned activities.
  - The reasons for having no assigned activities varied, but the most common was that the work eligible individual was a second parent in two-parent cases in which the second parent was not required to participate in activities because the family was not receiving child care (43% of those with no assigned activities in April, and 50% in May, and 64% in June);
- Engaged work eligible individuals participated in:
  - activities the state chose not to report (61% in April, 66% in May and 65% in June);
  - activities that have insufficient hours to meet the requirements (40% in April, 41% in May and 34% in June); and
  - activities that are currently non-countable for federal work participation rates (37% in April, 43% in May and 36% in June);
- Wisconsin is collecting all of the needed verification to document participation in assigned activities.

## Background

The Claims Resolution Act of 2010 reauthorized funding of the Temporary Assistance for Needy Families (TANF) program through September 30, 2011. The Act also established new state reporting requirements, under Section 812.

Section 812 requires each State to submit a "Report on Engagement in Additional Work Activities". The report must be submitted for two reporting periods. The first reporting period was for March 1, 2011 through March 31, 2011 due no later than May 31, 2011. The second reporting period, which this report covers, is from April 1, 2011 through June 30, 2011 due no later than August 31, 2011.

In addition, each State must publish to its website the following information:

- A. a summary of the information submitted in the ACF 812 report
- B. an analysis statement comparing the data submitted in the ACF 812 report to the data submitted in the State's quarterly work participation rate report; and

- C. a narrative describing the most common activities contained in the report that are not countable toward the State work participation rates under section 407 of the Social Security Act.

This publication includes all three items. In addition, we have added a section at the end which provides background on the federal work participation rate requirements.

### Part A – Summary of Information Submitted in the Report to ACF

States had the option of reporting on their full TANF caseload or selecting a random sample. Wisconsin selected a random sample of 350 cases for each report month. Cases selected for each of the report months included the following number of individuals: April – 433, May 428, and June – 417.

The following are the number of work-eligible individuals in the report sample for each month that participated in countable work activities for a sufficient number of hours for the family to count toward the work participation rate (WPR):

- April – 101 out of 433 individuals. The remaining 332 individuals did not have sufficient number of hours to count toward the work participation rate;
- May – 91 out of 428 individuals. The remaining 337 individuals did not have sufficient number of hours to count toward the work participation rate; and
- June – 101 out of 417 individuals. The remaining 316 individuals did not have sufficient number of hours to count toward the work participation rate.

See Table 1 below for detail on the types of activities that individuals who did not count toward the participation rate were engaged in. Note that individuals may be reported in more than one category listed on the table.

**Table 1: ACF 812 Data for Individuals Not Meeting WPR**

	Number	%
<b>Total Number of Individuals</b>	April – 332 May – 337 June – 316	<b>100%</b>
Description: Total individuals who did not have sufficient number of hours for the family to count toward the work participation rate.		
<b>9.* State Chose Not to Report [Voc Ed and Job Search]</b>	April – 212 May – 224 June – 200	63.8% 66.4% 63.2%
Description: Total individuals who participated in a work activity that could count towards the work participation rate, but the State chose not to report such hours of participation in the quarterly TANF/SSP MOE Data Report because the family did not need the individual’s hours of participation to meet the work requirements to count toward the work participation rate (or the hours were not sufficient to help the individual meet the work participation rate).		
Note: There are two Countable Work Activities that Wisconsin elects not to report when the hours are either not needed or not sufficient to help the individual meet the work participation rate. These are <i>Vocational Educational Training and Job Search and Job Readiness</i> .		

	Number	%
	April – 134 May – 153 June – 112	40.3% 45.4% 35.4%
<b>10. Insufficient Hours [All except Voc Ed and Job Search]</b>		
Description: Total individuals who participated in a Countable Work Activity that did not count toward the work participation rate, because the work-eligible individual was engaged for insufficient hours to meet the work requirements for counting towards the work participation rates.		
Note: There are five Countable Work Activities that Wisconsin reports regardless of whether or not an individual will meet the work participation rate in a given month. These are: <ul style="list-style-type: none"> <li>• <i>Unsubsidized Employment</i></li> <li>• <i>Community Work Experience</i></li> <li>• <i>Job Skills Training Directly related to Employment</i></li> <li>• <i>Education Directly Related to Employment</i></li> <li>• <i>Satisfactory School Attendance</i></li> </ul>		
<b>11. Beyond Statutory Limits</b>	<b>0</b>	<b>0.0%</b>
Description: Total individuals who participated in a countable work activity that did not count toward the work participation rates because the hours of participation in the activity are beyond statutory limit for reporting the hours of participation as countable work activities.		
Note: Two Work Activities, <i>Job Search and Job Readiness</i> and <i>Vocational Educational Training</i> have limits pertaining to the amount of time the activity may be counted towards an individual's work participation. However, there were no individuals in the sample that had reached their statutory limit for either activity.		
<b>12. Did Not Meet Federal Verification Standards</b>	<b>0</b>	<b>0.0%</b>
Description: Total individuals who participated in a Countable Work Activity, but the state did not report such hours of participation in the TANF/SSP MOE Data Report because the State could not meet the Federal verification standards for including the hours of participation in the report.		
	April – 98 May – 114 June – 96	29.5% 33.8% 30.4%
<b>13. Non-Countable Activities</b>		
Description: Total individuals who participated in activities that do not qualify as a countable work activity under Section 407 (d) of the Social Security Act. The activities are considered to be moving the family toward self-sufficiency.		
Note: Wisconsin reported having individuals in the following federal categories of non-countable activities ( <i>See Part C for more detail</i> ): <ul style="list-style-type: none"> <li>• <i>Treatment Activities</i></li> <li>• <i>Family Life Skills</i></li> <li>• <i>Accessing Work Support Activities</i></li> </ul> <i>Other Activities</i>		

	Number	%
<b>14. No Activities</b>	April – 50 May – 41 June – 53	15.0% 12.1% 16.7%
Description: Total individuals who participated in no countable or non-countable work activities. Subtotals are below:		
<i>Total individuals in first month of assistance and no work activity assigned</i>	April – 1 May – 3 June – 2	0.3% 0.9% 0.3%
<i>Total individuals who were assigned to a work activity that had not yet begun.</i>	April – 3 May – 0 June – 2	0.9% 0.0% 0.6%
<i>Total individuals who had not been engaged by the local agency (or its contractor).</i>	April – 7 May – 1 June – 1	2.1% 0.2% 0.3%
<i>Total individuals who were in the process of relocating from one local agency with the state to another.</i>	April – 0 May – 0 June – 0	0.0% 0.0% 0.0%
<i>Total individuals where work activity report received too late for inclusion in report to HHS</i>	April – 0 May – 0 June – 1	0.0% 0.0% 0.3%
<i>Total individuals who were disregarded from the work participation rate for reasons which may include:</i> <ul style="list-style-type: none"> <li>▪ <i>single custodial parent with child under age one;</i></li> <li>▪ <i>subject to a sanction for refusing to participate in work activities, but not subject to a sanction for more than 3 months in the preceding 12-month period.; or</i></li> <li>▪ <i>participating in a Tribal work program.</i></li> </ul>	April – 16 May – 15 June – 17	4.8% 4.4% 5.3%
<i>Total individuals who were exempt due to being a single custodial parent with child under age 1, but not disregarded due to 12-month limitation.</i>	April – 0 May – 0 June – 2	0.0% 0.0% 0.6%
<i>Total individuals who were subject to a sanction for refusing to work, not disregarded due to statutory or subject to a non-work sanction limitation.</i>	April – 0 May – 0 June – 1	0.0% 0.0% 0.3%
<i>Total individuals who were exempt due to illness or incapacity of the work eligible individual.</i>	April – 2 May – 5 June – 1	0.6% 1.4% 0.3%
<i>Total individuals who were exempt due to domestic violence waiver.</i>	April – 0 May – 1 June – 0	0.0% 0.2% 0.0%

	Number	%
<i>Total individuals with Good Cause Exemption</i>	April – 4	1.2%
	May – 1	0.3%
	June – 0	0.0%
<i>Total individuals who were the second parent in a case that was not receiving federally funded child care. In these cases, the second parent is not required to participate.</i>	April – 17	5.1%
	May – 15	4.5%
	June – 26	8.2%

\*Numbers in table refer to response items in ACF 812 report.

## Part B – Report Analysis

This section provides an analysis of the extent to which the data submitted in the ACF 812 report differs from the data submitted in the State’s quarterly report submitted for the comparable period.

As shown in Table 3, the 3-month sample pulled for the ACF 812 report had a higher overall work participation rate than the cases reported in the State’s quarterly report for April, May and June 2011. The sample pulled for the ACF 812 also had a disproportionate number of two-parent cases. Whereas the percentage of two-parent cases in the full caseload for April, May and June 2011 was between 4% and 5%, the percentage of two-parent cases in the 3-month sample was between 19% and 24%. The reason for this over sampling of two-parent case is that Wisconsin’s separate state program (SSP) is used primarily for nonqualified aliens who are not eligible for TANF. These individuals are more likely than our general TANF population to be in two-parent cases.

**Table 3: ACF 812 Data Compared to Quarterly Report Data for March 2011**

	Sample used for ACF 812 Report		Full Caseload for April, May & June 2011	
	# of Cases	WPR	# of Cases	WPR
1-Parent	April -268 May – 272 June – 284	April – 36.14% May – 33.01% June – 35.65%	April – 9,403 May – 10,208 June – 10,351	April – 36.61% May – 37.17% June – 34.45%
2-Parent	April – 82 May – 78 June – 66	April – 42.86% May – 38.60% June – 45.28%	April – 461 May – 513 June - 524	April – 25.16% May – 20.27% June – 17.75%
All Family	April – 350 May – 350 June – 350	April – 37.74% May – 34.22% June – 37.55%	April – 9,864 May – 10,721 June – 10,875	April – 36.07% May – 36.36% June – 33.65%

When comparing the ACF 812 data to the quarterly report data, it is important to note that the work participation rate is calculated based on whether a case met the required hours of participation. The data reported in ACF 812 is based on individual level data.

At first glance, the sample data appears to show a high rate of non-participation (for example, only 101 of the 433 individuals in the April sample met the WPR). However, in further analyzing the data in the context of what is submitted for these individuals in the quarterly report, a more complete picture is formed.

A review of the 350 sample cases that were pulled in the months of April, May and June, shows that:

- In April, 85 out of 350 cases were disregarded;
- In May, 87 out of 350 cases were disregarded; and
- In June, 81 out of 350 cases were disregarded.

These cases were disregarded from the work participation rate for reasons that may include:

- a. single custodial parent with child under age one;
- b. subject to a sanction for refusing to participate in work activities, but not subject to a sanction for more than 3 months in the preceding 12-month period.; or
- c. participating in a Tribal work program.

Of the remaining sample cases that were not disregarded:

In April, 100 out of remaining 265 cases (or 37.74%) met the work participation rate; May 90 out of remaining 263 cases (or 34.22%) met the work participation rate; and June 101 out of remaining 269 cases (or 37.55%) met the work participation rate.

To better understand the data, the remainder of the report will focus on the cases in the sample that did not meet the work participation rate and were not disregarded:

- In April, there were 165 cases that did not meet work participation rate and were not disregarded. Of these;
  - 129 were single-parent cases.
  - 36 were two-parent cases;
- In May, there were 173 cases that did not meet work participation rate and were not disregarded. Of these:
  - 138 were single-parent cases.
  - 35 were two-parent cases;
- In June, there were 168 cases that did not meet work participation rate and were not disregarded. Of these:
  - 139 were single-parent cases.
  - 29 were two-parent cases

This analysis shows that of the cases that are not already meeting the work participation rate or disregarded from the rate:

- Wisconsin is engaging the majority of the work eligible individuals in some activities. 86% in April and June had assigned activities and 90% in May had assigned activities.
  - The reasons for having no assigned activities varied, but the most common was that the work eligible individual was a second parent in two-parent cases in which the second parent was not required to participate in activities because the family was not receiving child care(43% of those with no assigned activities in April, and 50% in May, and 64% in June);
- Engaged work eligible individuals participated in:
  - activities the state chose not to report (61% in April, 66% in May and 65% in June);
  - activities that have insufficient hours to meet the requirements (40% in April, 41% in May and 34% in June); and
  - activities that are currently non-countable for federal work participation rates (37% in April, 43% in May and 36% in June);
- Wisconsin is collecting all of the needed verification to document participation in assigned activities.

**Table 4: ACF 812 Data for Individuals Not Disregarded and Not Meeting WPR Broken Out by Case Type**

	<b>Number</b>	<b>%</b>
Single Parent Family	April - 129 May - 138 June - 139	100.0% 100.0% 100.0%
Two-Parent Family	April - 72 May - 70 June - 58	100.0% 100.0% 100.0%
<b>All Family</b>	<b>April - 201</b> <b>May - 208</b> <b>June - 197</b>	<b>100.0%</b> <b>100.0%</b> <b>100.0%</b>
<b>9.* State Chose Not to Report [Voc Ed and Job Search]</b>		
Single Parent Family	April - 87 May - 101 June - 100	67.4% 73.2% 71.9%
Two-Parent Family	April - 36 May - 37 June - 27	50.0% 52.9% 46.6%
<b>All Family</b>	<b>April - 123</b> <b>May - 138</b> <b>June - 127</b>	<b>61.2%</b> <b>66.3%</b> <b>64.5%</b>
<b>10. Insufficient Hours [All except Voc Ed and Job Search]</b>		
Single Parent Family	April - 42 May - 51 June - 45	32.6% 37.0% 32.4%
Two-Parent Family	April - 38 May - 35 June - 22	52.8% 50.0% 37.9%
<b>All Family</b>	<b>April - 80</b> <b>May - 86</b> <b>June - 67</b>	<b>39.8%</b> <b>41.3%</b> <b>34.0%</b>
<b>11. Beyond Statutory Limits</b>		
Single Parent Family	0	0.0%
Two-Parent Family	0	0.0%
<b>All Family</b>	<b>0</b>	<b>0.0%</b>
<b>12. Did Not Meet Federal Verification Standards</b>		
Single Parent Family	0	0.0%
Two-Parent Family	0	0.0%
<b>All Family</b>	<b>0</b>	<b>0.0%</b>

	Number	%
<b>13. Non-Countable Activities</b>		
Single Parent Family	April – 60 May – 74 June – 64	46.5% 53.6% 46.0%
Two-Parent Family	April – 14 May – 16 June – 7	19.4% 22.9% 12.0%
<b>All Family</b>	<b>April – 74 May – 90 June – 71</b>	<b>36.8% 43.3% 36.0%</b>
<b>14. No Activities</b>		
Single Parent Family	April – 12 May – 6 June – 9	9.3% 4.3% 6.4 %
<i>Family's first month on assistance and no work activity assigned</i>	<i>April – 1 May – 1 June – 2</i>	<i>0.8% 0.7 % 1.4%</i>
<i>Total individuals who were assigned to a work activity that had not yet begun.</i>	<i>April – 2 May – 0 June – 2</i>	<i>1.5 % 0.0% 1.4%</i>
<i>Total individuals who had not been engaged by the local agency (or its contractor).</i>	<i>April – 5 May – 1 June – 0</i>	<i>3.9% .7% 0.0%</i>
<i>Total individuals whose work activities reports were received too late for inclusion in report to HHS</i>	<i>April – 0 May – 0 June – 1</i>	<i>0.0% 0.0% 0.7%</i>
<i>Total individuals who were exempt due to being a single custodial parent with child under age 1, but not disregarded due to 12-month limitation.</i>	<i>April – 0 May – 0 June – 2</i>	<i>0.0% 0.0% 1.4%</i>
<i>Total individuals who are subject to a sanction for refusing to work, not disregarded due to statutory or subject to a non-work sanction limitation.</i>	<i>April – 0 May – 0 June – 1</i>	<i>0.0% 0.0% 0.7%</i>
<i>Total individuals who were exempt due to illness or incapacity of the work eligible individual.</i>	<i>April – 1 May – 2 June – 1</i>	<i>0.8% 1.4% 0.7%</i>
<i>Total individuals who were exempt due to domestic violence waiver.</i>	<i>April – 0 May – 1 June – 0</i>	<i>0.0% 0.7% 0.0%</i>

	<b>Number</b>	<b>%</b>
<i>Total individuals with Good Cause Exemption</i>	<i>April – 3</i> <i>May – 1</i> <i>June – 0</i>	<i>2.3%</i> <i>0.7%</i> <i>0.0%</i>
<b>Two-Parent Family</b>	April – 16 May – 14 June – 19	22.2% 20.0% 32.8%
<i>Family's first month on assistance and no work activity assigned</i>	<i>April – 0</i> <i>May – 2</i> <i>June – 0</i>	<i>0.0%</i> <i>2.9%</i> <i>0.0%</i>
<i>Total individuals who were assigned to a work activity that had not yet begun.</i>	<i>April – 1</i> <i>May – 0</i> <i>June – 0</i>	<i>1.4%</i> <i>0.0%</i> <i>0.0%</i>
<i>Total individuals who had not been engaged by the local agency (or its contractor).</i>	<i>April – 1</i> <i>May – 0</i> <i>June – 1</i>	<i>1.4%</i> <i>0.0%</i> <i>1.7%</i>
<i>Total individuals who were exempt due to illness or incapacity of the work eligible individual.</i>	<i>April – 1</i> <i>May – 2</i> <i>June – 0</i>	<i>1.4%</i> <i>2.9%</i> <i>0.0%</i>
<i>Total individuals with Good Cause Exemption</i>	<i>April – 1</i> <i>May – 0</i> <i>June – 0</i>	<i>1.4%</i> <i>0.0%</i> <i>0%</i>
<i>Total individuals who were the second parent in a case that was not receiving federally funded child care. In these cases, the second parent is not required to participate.</i>	<i>April – 12</i> <i>May – 10</i> <i>June – 18</i>	<i>16.7%</i> <i>14.3%</i> <i>31.0%</i>
<b>All Family</b>	<b>April – 28</b> <b>May – 20</b> <b>June – 28</b>	<b>13.9%</b> <b>9.6%</b> <b>14.2%</b>

\*Numbers in table refer to response items in ACF 812 report.

## **Part C – Activities Reported to ACF that are Not Countable toward the State Work Participation Rate**

The following is a description of each non-countable activity that Wisconsin reported in item number 13 in Parts A and B.

### **Treatment Activities**

**Domestic Violence Assessment and Supportive Services:** for a participant who is receiving services for domestic violence. This includes assessment and supportive services, such as counseling, temporary shelter, legal assistance, etc.

**Ongoing Medical/Personal Care:** Report this activity when a participant is involved in ongoing medical appointments or during timeframes when a participant cannot be assigned to other work activities due to medical restrictions that are expected to last more than six months. The medical restrictions and the expectation that the activity will last more than six months must be certified by a qualified medical or mental health professional.

### **Family Life Skills**

**Parenting Skills:** Report this activity for participants who are engaged in activities that teach effective parenting skills. Activities may include:

- Parenting techniques
- Nutrition
- Family planning
- Behavior modification

**Personal Development:** Report this activity for participants who are engaged in activities that promote a healthier lifestyle but the activity has not been determined to be medically necessary. The activity must be assigned with the goal of moving the participant towards employment. These activities may include, but are not limited to:

- Personal journaling
- Motivational reading
- Exercise at home
- Smoking cessation
- Weight loss promotion
- Ongoing support groups for domestic violence, Alcoholics Anonymous, Narcotics Anonymous, etc.

### **Accessing Work Support Activities**

**Drivers Education:** When a participant is enrolled in a course of study that includes both classroom and behind-the-wheel instruction designed to prepare the student to pass the Wisconsin Driver's License Examination. This activity may also be used to reflect those hours a participant attends classes in order to have a Driver's License reinstated.

**Housing-Related Activities:** For those participants experiencing a housing crisis and in need of stabilizing their living situation. This may include guided or self-directed housing search, relocating to get out of a domestic abuse situation and housing education sessions at community agencies.

### **Other**

**Family Member Treatment/Counseling:** When a participant is attending appointments on a weekly basis for another W-2 group member's medical, AODA mental health needs, or other treatment/counseling

**Court-Related/Legal Appointments:** Activities where participant is scheduled for court-ordered appointments for self and/or children. This may include:

- child welfare home visits and Wrap-Around staffing sessions,
- child support hearings and legal meetings with attorneys,
- probation and parole appointments, and
- Huber-related activities.

## **Background on the Federal Work Participation Rate**

When Congress created TANF in 1996, one of its goals was to ensure that families getting cash assistance received help in attaining self-sufficiency. Congress established the work participation rate as the tool to measure whether or not a state meets this goal. Each State must meet an overall work participation rate of 50% and a 90% work participation rate for two-parent families or be subject to a financial penalty. The work participation rate focuses on work eligible individuals and whether or not the WEI is engaged in specific work activities.

A work eligible individual is an adult recipient of TANF cash assistance unless the parent is:

- a non-citizen who is ineligible to receive assistance due to his or her immigration status;
- a Supplemental Security Income (SSI) recipient;
- a parent providing care for a disabled family member living in the home; or
- a parent receiving Social Security Disability Insurance (SSDI) benefits.

For a WEI to count towards the work participation rate, the individual must have verified participation in countable activities for a specific number of hours each month. Parents with children 6 years of age and older must participate in a countable activity for 30 hours per week for each week they are receiving a TANF benefit. Parents with children under 6 years old must participate for 20 hours. Families with two parents must participate an average of 35 hours per week.

Countable work activities are limited to:

- Unsubsidized Employment
- Subsidized Employment
- Community Work Experience
- Community Service
- On-the-Job Training
- Vocational Education/Training
- Job Search/Job Readiness

Note: Of the above Federal activities, Wisconsin only reports activities under Unsubsidized Employment, Community Work Experience, Vocational Educational/Training and Job Search/ Job Readiness.

WEIs with a 30 hour requirement must participate in the above activities for at least 20 hours and then also participate for 10 more hours in the above and/or:

- Job Skills Training Directly Related to Employment;
- Education Directly Related to Employment; and
- Satisfactory School Attendance

There are limits to how long an individual may be engaged in vocational education (twelve-month lifetime limit) and job search/job readiness training (limited to six weeks in a twelve-month period). Because Wisconsin meets the definition of needy state under 45 CFR § 260.30, the job search/job readiness limit increases to twelve weeks in a twelve-month period. There is an additional limit for job search: an

individual's participation in job search/job readiness does not count for a week that follows four consecutive weeks of job search/job readiness activities.

All other activities are considered non-countable.