

State of Alaska
Department of Health and Social Services
Division of Public Assistance

Summary and Analysis of Engagement in Additional Activities
For the Alaska Temporary Assistance Program (ATAP)

Special Report - Claims Reconciliation Act of 2010
ATAP Mandatory Participants - March 2011

Background: The State of Alaska, Department of Health and Social Services, Division of Public Assistance administers the federally funded Temporary Assistance for Needy Families (TANF) Program. Alaska's TANF program, named the Alaska Temporary Assistance Program (ATAP), is available to needy Alaskan families with dependent children. To qualify, families establish eligibility based on family composition and need. To continue to participate in the program, parents or caretaker relatives must participate in work activities.

Temporary Assistance includes cash benefits to help pay for basic living expenses while a family makes progress toward economic independence through employment. A family completes their own Family Self-sufficiency Plan and an employability assessment, and receives Work Services case management, childcare, transportation and job related training as needed to help them get a job and close their ATAP case by achieving economic self-sufficiency.

The Alaska Department of Health and Social Services evaluates the Temporary Assistance program by using data-based performance measures of success. These measures include the number of adults who obtain employment within 60 days, the number who have earnings, cases that close with a parent employed, and the number of cases that close and the family doesn't return to ATAP.

Federal Reporting of Participation: In addition to data-based performance measures that Alaska has developed, federal rules require each agency administering a federally funded TANF program to report on the participation of those parents who are required to plan for and go to work as a condition of receiving TANF benefits. Reports are provided quarterly to the US Department of Health and Human Services (DHHS), Administration for Children and Families (ACF) describing the number of *verified hours of "countable" activity* for each adult required to participate.

Countable Activities fall into two categories: Core and Support Activities. Hours spent in Core Activities count towards a parent's total hours participating each week. Hours spent in Support Activities count only when a parent has completed 20 hours of Core Activity in that week.

Countable Activities are:

- | CORE | SUPPORT |
|--|--|
| <ul style="list-style-type: none">• Unsubsidized Employment• Subsidized Employment• On-the-Job Training• Work Search & Job Readiness• Business Work Experience• Community Work Experience• Vocational Education & Training | <ul style="list-style-type: none">• Job Skills Training• Education Directly Related to Employment and English as a Second Language Classes• Adult Basic Education including GED and High School Completion |

A wide and complex range of counting and verification standards must be followed in order to correctly report hours of work and other activities. Countable activities and standards of verification are described in federal regulations. Alaska has described how the state will meet federal standards in the Alaska Work Verification Plan, which has been approved by US DHSS-ACF. A copy of Alaska’s current plan can be viewed at:
http://dpaweb.hss.state.ak.us/manuals/workservices/pdf/Work_Verification_Plan_2008.pdf

State TANF programs are required to report verified countable hours that allow families to meet the participation rate standard for their family type:

<u>Single parents with a child under age 6</u>	<u>Parents with no children under age 6</u>
20 hours verified countable activity per week	30 hours verified countable activity per week

All families’ *verified & countable activity* hours are compiled and collectively determine the TANF “participation rate” for Alaska’s TANF program.¹

States are allowed to “under-report” hours that do not contribute to a family meeting the participation standard. In some cases this is done strategically to conserve the number of reportable hours or weeks of activity for an individual case until a week during which that activity contributes to them meeting the participation standard.

¹ Please note this report references only the All Families rate. Alaska is subject to two participation rates, the “All Families” and the “Two-Parent Families Rate” which is not discussed here.

While some states only report hours for those families that met the participation standard for that week, Alaska reports all verified countable activity hours to US DHHS-ACF except in the following cases:

- Work Search & Job Readiness – Alaska does not report verified activity hours unless those hours contribute to the family meeting the participation standard that week. This allows Alaska to maximize the number of weeks the family meets the rate as only 12 weeks are countable in every 12 month period (current month and previous 11 months).
- Vocational Education – Alaska does not report verified activity hours unless those hours contribute to the family meeting the participation standard that week. This allows Alaska to maximize the number of weeks the family meets the rate as parents are allowed only 12 countable months of Vocational Education while receiving TANF benefits.

Special Report on Engagement in Additional Activities: With the passage of the Claims Reconciliation Act of 2010, Section 411 of the Social Security Act (42 USC 611) was amended to include Pre-Reauthorization State-by-State Reports on Engagement in Additional Work Activities and Expenditures.

As per DHHS-ACF guidance, Alaska has electronically submitted a report on Engagement In Additional Activities (form ACF-812) for a sample of mandatory participant TANF families in March, 2011.

“Additional Activities” that are not submitted to DHSS-ACF fall into three categories:

- Countable activities strategically underreported in order to maximize participation rates when activities are limited in the number of weeks or months that may be counted.

Example: A parent who is working 30 verified hours per week is also looking for a new job with higher wages and spends 5 hours a week in Work Search. Work Search would not be reported for that week as the parent already met the participation standards with their verified countable activity of Unsubsidized Employment.

- Countable activities meeting regulatory definitions but not verified as required.

Example: 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. Without verification, Alaska cannot report this activity to DHHS-ACF.

- Activities that do not meet the definitions of countable activities, but do contribute to the increased self-sufficiency and/or employability of a parent receiving TANF benefits.

Example: A parent receiving TANF who is unable to participate in countable activity due to a long-term or chronic health, mental health or substance abuse issue addresses and receives treatment for their condition.

The ACF-812 report includes the following:

“(B) ENGAGEMENT IN ADDITIONAL WORK ACTIVITIES.—

“(i) With respect to each work-eligible individual in a family receiving assistance during a reporting period specified in subparagraph (A), whether the individual engages in any activities directed toward attaining self-sufficiency during a month occurring in a reporting period, and if so, the specific activities—
“(I) that do not qualify as a work activity under section 407(d) but that are otherwise reasonably calculated to help the family move toward self-sufficiency; or
“(II) that are of a type that would be counted toward the State participation rates under section

“407 but for the fact that—

“(aa) the work-eligible individual did not engage in sufficient hours of the activity;
“(bb) the work-eligible individual has reached the maximum time limit allowed for having participation in the activity counted toward the State’s work participation rate; or
“(cc) the number of work-eligible individuals engaged in such activity exceeds a limitation under such section.
“(ii) Any other information that the Secretary determines appropriate with respect to the information required under clause (i), including if the individual has no hours of participation, the principal reason or reasons for such non-participation.

Concurrent with submission of the required reports, each State is required to publish a summary and analysis of the engagement in additional activities.

The required elements are:

- “(A) a summary of the information submitted in the report
- “(B) an analysis statement regarding the extent to which the information changes measures of total engagement in work activities from what was (or will be) reported by the State in the quarterly report submitted under subsection(a) for the comparable period; and
- “(C) a narrative describing the most common activities contained in the report that are not countable toward the State participation rates under section 407.

Required elements appear below.

Summary of Report on Engagement in Additional Activities: Below is a summary of the (ACF-812) data submitted to US DHHS Administration for Children and Families.

Sample and Participation Standards	Cases	% of total
Total Sample Size – mandatory participant families	213	100%
Cases that met the participation standard for their family type	76	36%
Cases that did not meet the participation standard for their family type	137	64%

Review of this data is consistent with Alaska’s All Families Participation Rate.

More than one third of sampled cases (36%) met the participation standards for March 2011.

Level of Engagement		Cases	% of total	
Total Sample Size – mandatory participant families		213	100%	
Cases with hours of activity	Cases with countable activity hours who met participation standards	76	184	36%
	Cases with activities that did not meet participation standards	108		51%
				86%
Cases with countable hours that were not reported to ACF		12	6%	
Cases that didn’t meet participation standards & countable hours not reported		1	0%	
Cases with no activity hours		29	14%	

The number of families who are participating in activities that promote self-sufficiency is an indicator of how effectively a TANF program engaging families and promoting self-sufficiency.

Eighty-six percent (86%) of the sampled cases were engaged in meaningful activities in March 2011.

In March, 86% of families sampled participated in activities that are recognized as valuable in moving them towards self-sufficiency. Over forty percent (41%) of the 184 cases with activity hours met the participation standards for their family type. The remaining 108 (59%) were engaged at some level in countable and not-countable activities.

Fourteen percent (14%) of families cases had no activity hours in March.

Characteristics of Families without Activity Hours	Cases	% of cases without activity	% of total cases sampled
Cases with no activity hours	29	100%	14%
Parent in process of being penalized (penalty pending)	16	62%	8%
Parent penalized for not developing a family plan / engaging in assigned activity	2		
Family new to program (first month on assistance & activity not assigned yet)	5	24%	3%

Family moved in March (relocated local jurisdiction)	2		
Failed to engage family	6	20%	3%

The number of families without activity hours in March is considerably different than data reported to ACF because non-countable hours of activity that support self-sufficiency were included in this report.

Analysis Statement: Using activity hours as an indicator of family engagement in self-sufficiency efforts, the number of sampled cases with activity is 86%. More than three quarters these engaged cases had verified, countable activities reported.

Using an expanded definition of activity hours to include family self-sufficiency planning efforts significantly impacts the number of families Alaska is able to identify to ACF as engaged in self-sufficiency activities.

Level of Engagement by Activity Level			Cases	% of total	
Total Sample Size – mandatory participant families			213	100%	
Cases with hours of activity	Cases with countable activity hours who met participation standards	76	184	36%	87%
	Cases with countable activities that did not meet participation standards	66		31%	
	Cases with family self-sufficiency as the only activity due to exemption status	42		20%	
Cases with no activity hours			29	13%	

Narrative: The most common uncountable activity described in the report was time parents spent planning for self-sufficiency. Each family develops a Family Self-Sufficiency Plan (FSSP) that describes the steps they will take to increase their self-sufficiency and close their ATAP case. Family Self-sufficiency planning is required of all parent’s receiving ATAP benefits, including those who are exempted from work due to medical condition, care for a new baby, or penalty status.

While this planning can be countable when it meets the definition of Work Search and Job Readiness (such as an interactive debrief around the parents success and lessons learned in applying and interviewing for employment), most often Family Self-Sufficiency Planning is not a countable activity.

Despite the fact that family self-sufficiency planning is not usually a verified countable activity, it is the foundation for parents’ engagement in activities and in their making progress towards employment. Activities are assigned, employment goals are identified, support and community

service needs are identified and the parent, in collaboration with their case manager, make their plan and leave the meeting with a clear map to their future self-sufficiency and a schedule of activities.

Almost all families evaluated for this report were actively engaged in planning for getting a job and engaged in work or other activities that support economic self-sufficiency.

Those families whose only activity was family self-sufficiency planning were those who were exempted from countable activities.

Characteristics of Families with self-sufficiency planning as their only activity	Cases	% of cases without activity	% of total cases sampled
Cases with self-sufficiency planning as the only activity	42	100%	20%
Exempted due to medical condition lasting more than a month	21	50%	10%
Exempted due to care for a child under age 1	12	29%	6%
Short-term good cause reason for lack of countable hours	9	21%	4%

Twenty (20%) percent of the cases sampled were not engaged in countable activities because they were unable to participate. Ten percent (10%) of cases included a parent receiving TANF benefits but unable to go to work due to a documented medical condition lasting more than 1 month, and another four percent (4%) had good cause for not engaging in countable activity. Another six percent (6%) of sampled cases had a single parent who was choosing to be exempted from work to care for a baby.

Of those 29 cases without activity, 62% were in the penalty process and 24% were new to TANF or the service area. Of the total 213 cases sampled, only six were not engaged.

Characteristics of Families without Activity Hours	Cases	% of cases without activity	% of total cases sampled
Cases with no activity hours	29	100%	14%
Parent in penalty process	18	62%	8%
New to TANF or moved to new service area	7	24%	3%
Failed to engage family	6	20%	3%

Conclusion:

Capturing data and performing analysis of the Engagement in Additional Activities for Alaska's TANF program as required by the Claims Reconciliation Act of 2010 was a very labor intensive exercise not currently supported by systems programming and those reporting rules already in place. Individual case look up and review of Case and Client Notes were necessary to ensure all data elements were generated and accurately noted in the ACF-812.

- Four FTE staff spent a combined total of more than 160 hours in generating required reports for a single month (March 2011).
- Significant resources will be needed to create the ACF-812 and required Summary and Analysis for the April, May and June report due in August, 2011.

Using a broader and more flexible test of "engaged" reveals that the vast majority of families are engaged in meaningful activities and working towards economic self-sufficiency.

- Record of engagement of TANF families in self-sufficiency activities is not captured completely using only verified countable activities and the participation standards.
- 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.

The overwhelming majority of families receiving TANF from the State of Alaska are engaged in efforts to increase their self-sufficiency.

- ***67% had countable activity hours***
- ***87% of sampled cases were currently engaged in Family Self-Sufficiency Planning***

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in compliance with 42 USC 611
Section 411(c) "Pre-Reauthorization
State-by-State Reports on
Engagement in Additional Work
Activities and Expenditures"
(2) "Publication of Summary and
Analysis of Engagement in Additional
Activities"*