

SUMMARY AND ANALYSIS OF ENGAGEMENT IN ADDITIONAL ACTIVITIES REPORT

In December 2010, Public Law 111-291, The Claims Resolution Act of 2010 required states to submit a report entitled ACF 812. States and Territories were required to submit a report on engagement in additional work activities for families receiving assistance under the Temporary Assistance for Needy Families (TANF). The TANF recipients must meet the work eligible definition and should be engaged in any activity that moved them towards self-sufficiency. The report was to entail activities that either qualified or did not qualify as a work activity, but yet the participant was engaged in such activity.

The Act required states and territories to submit two reports. The first reporting period began March 1, 2011 through March 31, 2011 that contains the information required of the report and due no later than May 31, 2011. The second reporting period was for April 1, 2011 through June 30, 2011 and due no later than August 31, 2011.

It is required by federal law that each state has a minimum of 50% of their work-eligible individual adults in countable work activities to avoid federal financial penalties. Adults engaged in countable work activities and are meeting their hourly weekly work requirements are used to determine whether or not states and territories have met the Work Participation Rate (WPR). If not, then federal financial penalty is applied.

Guam's Work Programs Section within the Division of Public Welfare of Department of Public Health and Social Services is the designated territorial agency responsible for the Employment and Training Programs for TANF and SNAP recipients.

Unfortunately, Guam had failed to submit the first report due no later than May 31, 2011. As a result, a penalty of \$138,619 will be reduced from Guam's Fiscal Year 2012 TANF Grant. The second report was submitted on September 30, 2011. The official report from ACF will determine Guam's WPR.

Based on ACF's Summary of Work Participation rate, Guam achieved FY 2009's participation rate of 1.2% for both the overall and two-parent rates.

In addition to reporting such data; each state and territory were required to submit a report and publish it on an Internet website maintained by the state agency responsible for administrating the TANF Program.

SUMMARY OF THE INFORMATION SUBMITTED IN THE REPORT AND ANALYSIS

Guam lacks an automated system to capture work participation hours, work activities, and a system that calculates work participation rates. Currently, the data are captured through the use of excel spreadsheets (templates) maintained by each social worker. It currently captures basic information (i.e. case name, social security number, case number,

etc); work hour requirement, work activity or component client is engaged in, total number of hours engaged for each month, and support services paid out to the client. But one must keep in mind that this template only captures or contains information on the clients that have been added to the social workers caseload or referred to the Work Programs Section. Therefore, not all TANF adults receiving assistance and determined work eligible were included in the templates.

In this new report, we are being asked to discuss work activities that are countable but the territory chose not to report the hours towards the work participation rate. Additionally, ACF is also asking for us to report “non-countable” work activities which was not a requirement before. However, Guam reports all activities that are countable.

The monthly TANF Check Registry which lists all the cases receiving TANF is our source to identify all adults receiving assistance. The social workers must verify if the adult meets the work eligible definition (WEI). Once the adult is determined work eligible, they are required to participate in our Leveraging Assistance Towards TANF Engagement (L.A.T.T.E.) Orientation in which the purpose, work requirements, participant responsibilities and support services are presented. Upon completion of the orientation, the participants are scheduled for initial assessment with an assigned social worker. The social worker develops an individual responsibility plan aligned with the participants’ career and/or educational goals. Each case is then assigned a weekly work requirement as specified in 45 CFR, Part 261.31 and 261.32, dated February 5, 2008 Final Rule. The work eligible adult must then be engaged in one or multiple core work components and meet the weekly requirement. The countable core work components include:

- 1) Unsubsidized Employment
- 2) Subsidized Private Sector Employment
- 3) Public Sector Employment
- 4) Work Experience
- 5) On-the-Job Training
- 6) Job Search and Job Readiness Assistance
- 7) Community Service Programs
- 8) Vocational Educational Training
- 9) Providing Childcare services to an individual Who is Participating in a Community Service Program

After the individual meets the basic level of participation, the following non-core activities may count towards the total work requirements hours of work:

- 10) Job Skills Training Directly Related to Employment
- 11) Education Directly Related to Employment
- 12) Satisfactory Attendance at a Secondary School or in a Course of Study Leading to a Certificate of Equivalency.

Any other work activity not listed above was considered ‘non-countable’ towards the participation rate. Additionally, Guam did not capture hours for those engaged in ‘non-

countable' work activities. As a result of the manual process for capturing data, the participants are engaged only in work activities that were countable.

The ACF 812 requires that states collect and report the following information:

- 1) Whether the individual engages in any activities that are directed toward attaining self-sufficiency and
- 2) If yes, the specific activities that
 - a. do not qualify as a countable work activity, but are calculated to help the family move to self-sufficiency; or
 - b. could be countable work activity, but either the work eligible individual has not engaged in such activities for a sufficient number of hours; the work eligible individual has reached the maximum allowable time limit for having to participate in the activity that counts; or the number of work eligible individuals engaged in such activity that exceeds statutory limitations.
 - c. If not engaged in countable or non-countable activity, principle reason for non-participation.

In order to address the requirement above, Guam is only able to provide a breakdown of the families captured on the excel templates because of the lack of an automated computer system. The data reported on the excel spreadsheets will vary from the actual data submitted to ACF. The reason for such disparity is the data is extracted from two different sources. The first being the department's Automated Guam Public Assistance (AGUPA) system which contains all the adults, household members, and eligibility fields for those are receiving public assistance. The contractor whom handles/maintains and extracts data is an off-island vendor. The second being, the excel spreadsheets maintained by Work Programs Section (WPS) which was mentioned earlier, captures all the adult recipients referred to the section for work activity engagement. The WPS data is submitted to the department's contractor who then merges the AGUPA data and WPS data; then transmits to ACF as a final report. In addition, it is the vendor who maps and applies the codes from the ACF Instruction Guide to those adults not listed in the WPS excel files but are in the AGUPA System. Guam does not use a sampling method, but choose to report all TANF cases.

In March of 2011, we had 1,307 TANF cases that were included in the work participation rate calculation. Within these cases, we had captured and identified the following:

Work Eligible Codes	Adults within TANF Cases:
(01) An Adult receiving assistance	403
(02) Non recipient parent due to a sanction	6
(03) Non-recipient parent due to a time limit	5
(05) Non-recipient parent due to other reasons	38
(06) Non-recipient, but not a parent	1
(07) Ineligible non-citizen due to immigration status	52
(09) Parent caring for a disabled family member	6
	511

Out of the 1,307 cases; 76 adults were disregarded from the work participation rate because the adult was either a single parent with a child under one year of age, or the case was sanctioned for a period of not more than 3 months due to non-compliance with work requirements, or identified as not work eligible. These disregarded or excluded cases adjusted the total cases to 1,231. Guam is required to collect and report data by utilizing the Instructions and Definition Guide provided by ACF to ensure each case and adults were properly coded. Within the 1,231 cases, 142 participants were coded (15,16,17,18,19) as engaged in a countable work activity; however Guam had 69 (Coded 18) cases that were participating but not meeting the minimum participation requirements while 73 (coded 15,16,19) were meeting the requirements. All the participants were in “countable” work activities.

The Work Participation Status of each adult captured in the WPS templates is illustrated below for March 2011:

Work Participation Status	Adults within TANF Cases:
Disregarded, Child Under 1	10
Disregarded, Sanction = or <3 months	7
Exempt, Disabled	14
Exempt, Caring for a disabled Child	2
Exempt, Domestic Violence Waiver	1
Exempt, Other	84
Required, Not Participating, sanction >3 months	4
Required, Not Participating, Sanction < 3 months	4
Required, not participating, no sanctioned for month	146
Deemed Engaged in work – Single/married Teen	1
Required, Participating, Not meeting minimum participation requirements	69
Required, Participating, meeting minimum requirements	72
Not Applicable (i.e. Not Work Eligible)	97
	511

Of the 1,231 cases, 73 met their participation requirements which should have determined Guam’s work participation rate to be at 5.9% (73 divided by 1,231). The primary reasons for non-participation for the remaining numbers of work eligible individuals not engaged in a work activity are due to State/Local Agency failed to engage individual, work activities reports received late to include in report to HHS, and individuals in process of being sanctioned.

The following illustrates the number of individuals engaged in the allowable work activities:

Work Activities	Adults Engaged in Work Activity
(50) Unsubsidized Employment	6
(51) Subsidized Private Sector Employment	4
(53) Work Experience	68
(55) Job Search & Job Readiness	60
(56) Community Service Programs	1
(57) Vocational Education Program	2
(60) Satisfactory Attendance w/no HS Diploma or Certificate of HS Equivalency	2
	143 ((1) adult engaged in multiple activity)

The second period reports data beginning April 1, 2011 and ends June 30, 2011. Within these cases, the following were identified:

	April 2011 Cases	May 2011 Cases	June 2011 Cases
	1,290	1,272	1,286
Work Eligible Codes	Adults within TANF Case: April 2011	Adults within TANF Case: May 2011	Adults within TANF Case: June 2011
(01) An Adult receiving assistance	394	357	337
(02) Non recipient parent due to a sanction	13	9	9
(03) Non-recipient parent due to a time limit	0	0	0
(05) Non-recipient parent due to other reasons	0	2	2
(06) Non-recipient, but not a parent	3	2	2
(07) Ineligible non-citizen due to immigration status	36	32	34
(09) Parent caring for a disabled family member	12	13	11
	458	415	395

Out of the cases for April through June 2011, there were 76 adults for April, 66 for May, and 64 adults for June 2011 that were disregarded from the work participation rate

because the adult was either a single parent with a child under one year of age, or the case was sanctioned for a period of not more than 3 months due to non-compliance with work requirements, or identified as not work eligible. These disregarded cases adjusted the total cases for each the months. All the participants were in “countable” work activities.

The Work Participation Status of each adult captured in the WPS templates is illustrated on the table below for the same reporting period. There are a high number of those participants that were exempted from participation due to other reasons. Some reasons include which are not specified, pregnancy, medical issues and caring for an ill family member outside of the home. In addition, those individuals identified as ‘required, but not meeting minimum work requirement’ are individuals who reported insufficient hours or have just started being engaged in a work activity perhaps at the end of the reporting month but could not count in the numerator of the work participation rate.

Work Participation Status	Adults within TANF Cases:		
	April	May	June
Disregarded, Child Under 1	14	12	10
Disregarded, Sanction = or <3 months	11	7	7
Exempt, Disabled	22	22	24
Exempt, Caring for a disabled Child	2	2	2
Exempt, Domestic Violence Waiver	1	0	0
Exempt, Other	92	86	74
Required, Not Participating, sanction >3 months	2	2	2
Required, Not Participating, Sanction < 3 months	0	0	0
Required, not participating, no sanctioned for month	152	150	161
Deemed Engaged in work – Single/married Teen	0	1	0
Required, Participating, Not meeting minimum participation requirements	58	23	9
Required, Participating, meeting minimum requirements	65	74	68
Not Applicable (i.e. Not Work Eligible)	39	36	38
	458	415	395

The following illustrates the number of individuals engaged in the allowable work activities:

Work Activities	Adults Engaged in Work Activity					
	April		May		June 2011	
	Core	Non-Core	Core	Non-Core	Core	Non-Core
(50) Unsubsidized Employment	9	0	6	0	11	0
(51) Subsidized Private Sector Employment	1	0	1	0	1	0
(52) Subsidized Public Sector Employment	1	0	2	0	1	0
(53) Work Experience	72	0	78	0	67	0
(55) Job Search & Job Readiness	37	0	12	0	1	0
(56) Community Service Programs	1	0	1	0	1	0
(57) Vocational Education Program	2	0	1	0	2	0
(60) Satisfactory Attendance w/no HS Diploma or Certificate of HS Equivalency	0	0	0	2	0	0
	123	0	103	2	84	0

The primary work component for all participants is the Work Experience Program, also known as the Community Work Experience Program (CWEP). Participants are placed in a government agency, non-profit or community based organization in order for the participant to gain the necessary job skills but also to explore a variety of career pathways if they are undecided about the career they want to pursue. In previous reports, those participants whom reported employment were exempted and the Work Programs Section was not capturing the hours the participant worked as they continue to receive TANF benefits. The primary reason for not capturing such hours is that participants refuse to return to DPHSS monthly to report their employment hours and it becomes an administrative burden for them. Since then, Guam changed its strategy to remove employment as an exemption and verify hours worked with the participant's employer through the use of a standard consent for disclosure form signed by the participant. This will assist WPS in obtaining information and resolve any confidentiality issues or concerns from the employers.

For April 2011, Guam had 65 participants, 75 participants for May, and 68 participants for June that were recorded as meeting their work participation requirement. Hence, based on Guam's calculation of the Work Participation Rate for:

- ♣ April 2011 – 65 out of 1,214 is 5%
- ♣ May 2011 – 75 out of 1,206 is 5.8%
- ♣ June 2011 – 68 out of 1,222 is 5.3%

If States and Territories were permitted to disregard individuals whom are certified as disabled and not employable, caring for a severely disabled child, those with medical issues (although employable) but not able to work, and domestic violence waivers; would assist us in meeting the required work participation rates.

With this additional report, Guam will have to make other changes to accommodate reasons for non-participation or reasons for insufficient hours. In 2012, Guam's Department of Public Health and Social Services will be implementing a new systems development, PhPro, which will eliminate the manual process of capturing the necessary data for the reports.

In addition, because Guam lacks such automation, WPS tracks and engages the participants in activities that are countable. The social workers have changed their assessment strategy to inquire about other activities the participant may be engaged in that could be countable or noted as "engaged" but not countable towards the participation rate and that are meaningful in the participant's perspective.

Narrative describing the most common activities contained in the report that are not countable toward the State Participation rates under section (407).

As mentioned previously, the new fields requirement or reasons for non-participation was not a field added to the WPS excel files in prior reports, but they will be included because of the significance in reporting such data not just for ACF but for Guam. Currently, the reasons for non-participation are contained either on the contact sheet in the participant's case file or in the comment box of the social workers' excel files.

The collection of this data will assist WPS to assess current practices and policies, as well as, to implement innovative ideas or strategies in increasing Guam's engagement of TANF participants. Hence, it is important that we include other activities the participant may be engaged in beginning FY 2012 that perhaps can be a 'countable activity' or 'disregarded case' when it comes time for the reauthorization of TANF.

It is noted that work eligible individuals in the TANF cases that were not counted toward the territories participation rate nor had no hours reported for the reporting month is because of the following reasons based on documentation by the social workers:

1. Adults were in their first month of assistance with no work yet assigned, or the work assignment had not begun;
2. Adults claiming employment but WPS is waiting for documentation or verification from employer.
3. Determined possible exemption at the time of the LATTE Orientation, but pending documentation from client to validate exemption.
4. Adults awaiting to be scheduled for LATTE Orientation;
5. Client, Placement, or Employer delay in reporting hours of participation before the end of the reporting period.
6. Adults engaged in Job Search Activity but unwilling to complete or unable to provide required documentation because they are fulfilling their work requirement hours in another core activity.

Again, also mentioned earlier, we can only document the reasons but are unable to provide the accurate numbers reflecting the primary reasons stated above.