



Countable Work Activities in the Temporary Assistance for Needy Families (TANF) Program

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DRA Changes Increase Focus On Countable Activities

Participation rates & list of countable activities remain the same, but

- Reset caseload reduction credit from 1995 to 2005
- Include recipients in separate state programs (MOE)



New Interim Final HHS Regulations

- Define when an activity can count as one of the federally listed work activities (restrictive language in preamble & rule)
- Uniform methods for reporting participation hours (actual hours, supervised daily, 10 days/yr excused absences, no more than 2/month)
- Documentation needed to verify reported hours

12 Countable Work Activities

Counting toward any hours

- Unsubsidized employment
- Subsidized private sector employment
- Subsidized public sector employment
- Work experience
- On-the-job training
- Job search and job readiness assistance (generally, up to 6 weeks a year)
- Community service programs
- Vocational educational training (up to 12 months, for up to 30 percent of those counting toward rates)
- Providing child care services to an individual who is participating in a community service program

Counting toward hours after 20

- Job skills training directly related to employment
- Education directly related to employment
- Satisfactory attendance at secondary school or in a course of study leading to a GED.
- Married parents and single household heads under age 20 can fully meet rates by satisfactory secondary school attendance or participating in education directly related to employment for 20 hours a week.



Concerns with Definitions

- Mutually exclusive definitions may hinder meeting either participants' or employers' needs
 - Hinder access to education and job readiness
 - Assume sequential rather than more effective integrated approaches
- No flexibility in hours for ADA accommodation- "count in other 50%"
- Verification requirements (actual hours) are burdensome and may prevent mainstreaming TANF recipients

Job Search/Job Readiness

Only activity under which job search, life skills, substance abuse treatment, mental health & other barrier removal is countable

- “if otherwise employable” & need certified by health professional
- Limited by law to 6 weeks per FY
 - 12 weeks in states with unemployment 50% above US average or “needy” state for TANF contingency fund
 - No more than 4 consecutive
- 1 week= 7 consecutive days; 1 hour=1 week (preamble)
- Must be under “constructive guidance” & reported daily
- Actual hours- no deeming of hours based on employer contacts
 - Must be documented and reported daily



What Can be Done?

- Allow clients to participate in needed activities even if not countable
- Count weeks strategically-don't report hours if client isn't going to count anyway
- Consider solely state funded (non-MOE) programs
- Provide for on-going job search and barrier removal activities under "excused absence" policy-up to 2 days a month



Unsubsidized and Subsidized Employment

- Current earnings for employed individuals can be used to project forward for 6 mos.
- Self employment can't be counted for more hours than net earnings/minimum wage
- Expectation that subsidized employment will lead to employment with that employer after participation-doesn't suit Transitional Jobs model (preamble)
- Can't include job search, education or training



Work Experience

- Recipients can only be required to “work off” their benefits at the equivalent of the minimum wage
- If application of FLSA results in fewer than 20 hrs, recipients will be deemed to have worked 20 core hrs
 - Scheduling issues: different hours for different recipients & getting the hours right
- To use this provision states must include Food Stamps in calculation
 - Must have approved simplified FSET
- Can’t include job search, job readiness or education & training
- No evidence that such programs increase employment or earnings



Community Service

- Must be a structured program for the direct benefit of the community, under the auspices of public or nonprofit organizations, and must be designed to improve the employability of recipients “not otherwise able to obtain employment”
 - Rules out barrier removal activities e.g. substance abuse treatment, mental health (“otherwise employable”)
 - Rules out activities that don’t benefit “greater community” e.g. caring for disabled family member
 - Rules out foster parenting because it doesn’t help individual move toward self-sufficiency
 - Does not include job search or job readiness, vocational education, or otherwise uncountable educational activities – unless “integral” to program



On-the-Job Training

(chance for creativity)

- Training in the public or private sector
- Given to a paid employee while he or she is engaged in productive work
- Provides knowledge and skills essential to full and adequate performance on the job
- Broader definition than WIA; can provide 100% subsidy
- May offset the cost of new entry and upgrade training on and off the worksite (ESL, basic skills, occupational skills, computers, soft skills, orientation)
- HHS asked for suggestions how to broaden
 - Pre-employment training at employer direction

Vocational Educational Training

- Core activity: best bet for getting recipients as far as possible in education
- Programs must prepare participants for a specific job, occupation or vocation
 - Basic skills can't be stand-alone
 - Ok if it is "of limited duration and is a necessary or regular part" of vocational education training
 - ?? Integrated approaches, bridge programs
 - ESL not explicitly included



Vocational Educational Training

- 12 month lifetime limit (same)
- 30% cap, with teens in education (same)
 - Could increase participation 3-fold
- Ban on counting of coursework leading directly to BA or advanced degree, but AA and certificate programs OK
- Can only count supervised homework time as part of the hours of participation (applies to all educational activities)
- Can only count actual hours; daily documentation reported to TANF bi-weekly



Job Skills Training Directly Related to Employment

- Training and education for job skills required by an employer
- Can include skills needed for advancement or to “adapt to changing demands of workplace” as well as job entry
- Can include literacy or language instruction when focused on skills needed for employment or in a unified whole with job training
- Must be combined with 20 hours of a core activity (30 for most two-parent families)



Education Directly Related to Employment

- Limited to recipients w/o diploma or GED
- May include adult basic education and ESL
- May include education leading to GED “where required as prerequisite for employment by employers or occupations.”
- Participants must make “good or satisfactory progress” (disability concern)
- Must be combined with 20 hours of a core activity (30 for most two-parent families)

What Can be Done?

- Help people get as far as possible in vocational educational training before they go to work
- Implement accelerated, intensive & modular approaches that result in a credential → entry to further education and/or employment (career pathways & bridge” programs for students with very low skills)
 - Training should be intensive/long enough to make a difference (=1 year full-time postsecondary)
 - Don't think of GED as an end goal
 - Target training to better jobs in demand in labor market
- Integrate basic skills and English language instruction with jobs skills training (VESL, family literacy)



What Can be Done?

- Link education and work
 - Combine postsecondary attendance after 12 months with work study opportunities (20 hours a week)
 - Negotiate flexible scheduling of education and/or work
 - Increase availability of programs on evenings and weekends for working students
- Consider solely state funded (non-MOE) programs



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