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**State of Wisconsin
Governor Scott Walker**

TO: Income Maintenance Supervisors
Income Maintenance Lead Workers
Income Maintenance Staff
W-2 Agencies
Workforce Development Boards
Job Center Leads and Managers
Training Staff
Child Care Coordinators

FROM: Janice Peters, Director
Bureau of Working Families
Division of Family and Economic Security

DFES OPERATIONS MEMO					
No: 12-69					
DATE: 12/17/12					
FS	<input type="checkbox"/>	MA	<input type="checkbox"/>	BC+	<input type="checkbox"/>
SC	<input type="checkbox"/>	CTS	<input type="checkbox"/>	CC	<input type="checkbox"/>
W-2	<input checked="" type="checkbox"/>	FSET	<input type="checkbox"/>	EA	<input type="checkbox"/>
CF	<input type="checkbox"/>	JAL	<input type="checkbox"/>	JC	<input type="checkbox"/>
RAP	<input type="checkbox"/>	WIA	<input type="checkbox"/>	Other	<input type="checkbox"/> *
		EP			
PRIORITY: High					

**SUBJECT: Overview of Federal Temporary Assistance for Needy Families (TANF)
Work Participation Requirements for W-2 Participants**

CROSS REFERENCE: [W-2 Manual 8.3.2.1: Education Activities for 18 and 19-year-old CSJ Participants](#)
[W-2 Manual 8.3.2.3: Aggregating Education and Training Hours](#)

EFFECTIVE DATE: Immediately

PURPOSE

The purpose of this memo is to give Wisconsin Works (W-2) workers an overview of current Federal TANF Work Participation Requirements for Community Service Job (CSJ) and W-2 Transition (W-2 T) participants and for second parents in two parent households that are receiving federally funded child care.

BACKGROUND

Under Federal TANF Regulations, states must meet a specified Work Participation Rate in its TANF assistance program each federal fiscal year. The TANF Work Participation Rate is the proportion of adult TANF recipients who must participate in work activities for a specified number of hours each week in relation to the overall number of families receiving TANF cash assistance.

The minimum Federal All-Family Work Participation Rate is 50%. Meeting or exceeding this rate is important to the Department and to the W-2 agencies for a number of reasons:

1. It ensures that needy families are working toward becoming self-sufficient and not receiving assistance for an indefinite amount of time.
2. A state that fails to meet the TANF Work Participation Rate may receive a financial penalty resulting in significant reductions to the state's TANF block grant funding.
3. Beginning in 2013, W-2 agencies will receive performance payments for meeting the quarterly Federal All-Families Work Participation Rate of 50%.

This memo does not present any shifts in W-2 policy or program philosophy. A memo with information similar to the content of this memo was issued in 2007 which communicated the Federal Work Participation Requirements at that time. Additional memos were released in 2008 explaining further changes that resulted from the U.S. Department of Health and Human Services, Administration for Children and Families (ACF) release of the TANF Final Rule.

W-2 agencies must review the Federal Work Participation Requirements laid out in this memo and consider where quality improvement measures should be taken to ensure that participants are engaged in work and training activities to the fullest extent possible.

FEDERAL WORK PARTICIPATION REQUIREMENTS

- A. In general, in order for a CSJ or W-2 T participant to meet the TANF Work Participation Requirement, the individual must participate in a minimum of 20 hours of Core activities per week. These 20 hours do not include hours in which a participant was sanctioned for non-participation. While W-2 good cause policy does not limit the number of hours a participant may receive good cause for non-participation, there are limits on the number of good cause hours that may be counted towards the TANF Work Participation Requirement. The Department keeps track of reportable hours through its federal reporting data system. (See F. below for more detail on how good cause hours are counted for Federal Work Participation.)

Core activities, as defined in TANF regulations, that count toward the 20-hour requirement may include participation in any of the following:

1. Working Full-Time (WF) or Working Part-Time (WP);
2. Work Experience (WE);
3. Paid Work Experience in the Private Sector, Not Funded by TANF (SZ) and Paid Work Experience in the Public Sector, Not Funded by TANF (SW);
4. Job Skills Training (JS) by itself or combined with Vocational Adult Basic Education (VA), Vocational English-as-a-Second-Language (VE), or Vocational Literacy (VL). This activity may count as a Core activity for no more than 12 months during the lifetime of a participant. The 12 months need not be consecutive;
5. Technical College (TC) and Technical College Study Time (TT). These activities may count as a Core activity for no more than 12 months during the lifetime of a participant. The 12 months need not be consecutive;

6. Activities that fall under the Federal definition of Job Search and Job Readiness. These activities may count toward the 20 hour per week requirement for no more than 240 hours for a single parent of a child under age six and 360 hours for all other work-eligible individuals. Hours may be counted for no more than four (4) consecutive weeks. The timeframe for these limits is the preceding 12 months. These activities include:
 - a. Disability and Learning Assessment (AD)
 - b. AODA Counseling (CA)
 - c. Career Planning & Counseling (CE)
 - d. Occupational Testing (OC)
 - e. Mental Health Counseling (CM)
 - f. Employment Search (ES)
 - g. Job Readiness/Motivation (MO)
 - h. Mental Health Assessment (AM)
 - i. AODA Assessment (AA)
 - j. Physical Rehabilitation (PR)
 - k. Life Skills (LF)
 - l. Physicians Assessment (AL)
 - m. Career Advancement Services (CR)
 - n. Job Retention Services (JR)
 - o. Mentor/Coach (MN);
 7. Assignment to a combination of any of the activities listed in 1 through 6 above.
- B. Along with the 20 hours per week of Core activities, CSJ and W-2 T participants whose youngest child is age six (6) or older must participate in 10 or more hours of additional Core or Non-Core activities, as defined in TANF Regulations. Non-Core activities may include:
1. Adult Basic Education (BE)
 2. English-as-a-Second Language (EL)
 3. Literacy Skills (LS)
 4. General Educational Development – GED (GE)
 5. High School Equivalency Diploma – HSE (HE)
 6. Regular School – K through 12 (RS)
- C. Teen parents, ages 18 and 19, who do not have a high school diploma, may meet their Work Participation Requirement either through the combination of Core and Non-Core activities described above, or through participation in activities that fall under the federal definition of Satisfactory School Attendance. These activities include:
1. General Educational Development – GED (GE)
 2. High School Equivalency Diploma – HSE (HE)
 3. Regular School – K through 12 (RS)
- For Satisfactory School Attendance, the TANF regulations do not require a specific assignment of hours. Participants must demonstrate that they are making progress towards completion of their diplomas.
- D. The following participants are disregarded from the monthly TANF Work Participation Rate:
1. CSJ and W-2 T participants who are caring for a disabled family member are not Work Eligible Individuals and are disregarded from the TANF Work Participation Rate. In order to be excluded, the participant must be assigned to one of two CARES activities, Caring for Disabled Child (CD) or Caring for Other Family Member (CF).

2. Custodial Parent of an Infant (CMC), CSJ and W-2 T participants who are a single custodial parent with a child under 12 months of age are disregarded from the TANF Work Participation Rate. There is a 12-month lifetime limit on disregarding a family for this reason.
 3. Participants who do not meet the Work Participation Requirement in a month due to a sanction (non-participation without good cause) may be disregarded up to three months. The three (3) months need not be consecutive. The timeframe for calculating the three (3) month limit is the proceeding 12 months.
- E. For federal reporting, a two-parent household is defined as two adults with a child in common with neither parent being disabled nor caring for a disabled family member. At least one parent in a two-parent household must meet the TANF Work Participation Requirements described in A. through C above. In addition, two-parent households must meet a Two-Parent Work Participation Requirement. The TANF Two-Parent Participation Rate is 90%:
1. Two-parent households that are receiving federally funded child care must participate in at least 55 hours of activity, at least 50 of which must be Core activities.
 2. Two-parent households that are not receiving federally funded child care must participate in at least 35 hours of activity, at least 30 of which must be Core activities.
- F. When calculating TANF Work Participation, hours of non-participation with good cause may count as participation within the following parameters:
1. Up to 80 hours of good cause may be counted as participation. The timeframe for the 80-hour limit is the preceding 12 months.
 2. Hours that are missed due to the following holidays may be counted as participation:
 - a. New Year's Day
 - b. Martin Luther King, Jr. Day
 - c. Memorial Day
 - d. Independence Day
 - e. Labor Day
 - f. Thanksgiving Day
 - g. Day after Thanksgiving Day
 - h. Christmas Eve Day
 - i. Christmas Day
 - j. New Year's Eve Day
 3. Good cause hours counted as participation may not exceed 16 hours in a calendar month. Holidays are not considered in this limit.

AGENCY ACTION

W-2 agencies are to use this memo as a guide for familiarizing W-2 agency staff with Federal TANF Work Participation Requirements.

CONTACTS

For Policy Questions in the Balance of State: Bureau of Regional Operations, W-2 Regional Coordinators

For Policy Questions in Milwaukee: Milwaukee Operations Section Regional Administrators

For CARES Processing Questions: W-2 Help Desk

Program Categories – FS – FoodShare, MA – Medicaid, BC+ – BadgerCare Plus, SC – Senior Care, CTS – Caretaker Supplement, CC – Child Care, W-2 – Wisconsin Works, FSET – FoodShare Employment and Training, CF – Children First, EA – Emergency Assistance, JAL – Job Access Loan, JC - Job Center Programs, RAP – Refugee Assistance Program, WIA – Workforce Investment Act, *Other EP – Other Employment Programs.

DCF/DFES/BWF/HH