



TANF 101: *Work Participation Rate*

CLASP

Policy solutions that work for low-income people

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Introduction

Temporary Assistance for Needy Families (TANF) is a federal flexible block grant to states, with a range of goals, notably to provide income support that allows children to be raised at home, to promote work, and to encourage marriage.

However, the federal government does not collect data on states' performance in achieving the full range of goals. The only measure of performance for which states are held accountable is the work participation rate (WPR). States that fail to meet the WPR targets are at risk of losing a share of their block grant.¹

CLASP has deep concerns about the WPR, including that it does not measure the effectiveness of work activities; that it does not give states credit for engaging recipients in activities such as full-time education and training beyond a year, or for addressing issues such as mental health needs or substance abuse treatment; and that it forces caseworkers to spend undue amounts of time tracking and documenting hours of participation.

Federal policy changes such as expanding countable activities under the WPR, or allowing states to opt-in to outcome-based performance measures in lieu of the WPR, would be powerful signals to states in support of moving away from one-size-fits-all approaches to TANF participation requirements and towards

individualized services that are more likely to enable recipients to achieve economic security. However, the power of the WPR in limiting states' ability to implement effective programs is often overstated. States have far more discretion to design programs and services for TANF recipients than is often recognized.

Overview of the Work Participation Rate

Under the WPR, states must engage a target share of families receiving assistance in a specific list of countable work activities for at least 30 hours a week (20 hours a week for single parents with one or more children under 6), or face financial penalties. By statute, the target rate is 50 percent; however, as discussed below, this target is lowered for states that have experienced caseload decreases, so many states have a lower effective target.

States may use TANF funds to provide a wide range of services to low-income families, but only families receiving ongoing "assistance to meet basic needs"—typically in the form of monthly cash benefits—are included in the WPR. Since the passage of the Deficit Reduction Act (DRA) of 2005, families receiving cash assistance with state funds are also included in the WPR if those state funds are claimed toward the TANF "maintenance of effort" (MOE) requirement.² Families that receive other

services funded by TANF or MOE, or that receive only “short-term, non-recurrent benefits” to respond to a specific episode of need are not counted in the WPR.

Families are included in the rate if an adult or teen parent head of household receives assistance. Since 2006, if a parent lives in the household with a child receiving assistance, the family may be included in the rate even if the parent is not receiving assistance herself.³

The WPR is a process measure, showing whether recipients were present at countable activities for the required number of hours. It does not measure whether these activities increased the participants’ employability or earnings. In order to receive credit towards the WPR, states must monitor and document all hours of participation. As a result, caseworkers must devote significant effort to verifying participation hours rather than on assisting families. There is no “partial credit”—for instance, states receive no credit for someone who participates fully for three weeks in a month, but misses most of a fourth week due to a sick child or other crisis.

The list of countable activities emphasizes work and work experience, and limits the extent to which education and training and activities to remove barriers to employment can be counted. For this reason, TANF is often described as having a “work first” orientation.

States are permitted to assign recipients to different activities than those that are federally countable, allow them to participate for fewer hours, or exempt them from participation entirely. However, if a state exempts recipients from participation, or modifies their work requirements, that does not remove them from the WPR. As a result, many states mandate participation in countable activities for all or nearly all recipients.

According to a separate requirement, 90 percent of two-parent families must be engaged in countable work activities for 35 combined hours a week between the two parents (55 combined hours if they receive child care subsidies). There is widespread agreement that this rate is not realistic given the significant barriers to employment faced by the small number of two-parent families who receive cash assistance. In the most recent year for which data are available, nearly half of states reported serving no two-parent families with TANF or state MOE funds. Many of these states have chosen to serve two-parent families with state funds not counted toward the MOE requirement, while others do not offer such families cash assistance at all.

Countable Activities

The federal law lists 12 categories of countable activities. Nine of these are so-called “core” activities, which can be counted for all hours of participation:

Unsubsidized employment;

- Subsidized private sector employment;
- Subsidized public sector employment;
- Work experience;
- On-the-job training;
- Job search and job readiness assistance;
- Community service programs;
- Vocational educational training, for up to twelve months; and
- Providing child care services to an individual who is participating in a community service program.

Three activities can only be counted when combined with at least 20 hours per week (averaged across a month) of a core activity, and are referred to as “non-core” activities:

- Job skills training directly related to employment;
- Education directly related to employment; and
- Satisfactory attendance at secondary school or in a course of study leading to a high school equivalency certificate.

In addition, teen parents (under age 20) may be deemed as participating if they maintain satisfactory attendance at secondary school or the equivalent or participate in education directly related to employment for at least 20 hours per week during the month.

Additional limits apply to the counting of some activities. Not more than 30 percent

of families counting toward participation rates may do so through participation in vocational educational training or being teen parents deemed as participating based on education. Job search and job readiness assistance may only be counted for 6 weeks per year (12 weeks during times of high unemployment or need),⁴ of which no more than 4 weeks can be consecutive.

The national achieved rate was 48.1 percent in 2018,⁵ down from 53 percent in 2017, and 51.9 percent in 2016.⁶

Fluctuations in the national rate are largely driven by California’s measured WPR, as it accounts for a large share of the national caseload.

Caseload Reduction Credit Reduces Targets States Must Achieve

Along with the work participation rate requirements, the 1996 law also included a “caseload reduction credit” (CRC), which reduced the target states were required to achieve by a percentage point for every percent of caseload decline since 1995. Because cash assistance caseloads declined very sharply during the early years of TANF, most states had very low, or zero, effective participation rate requirements by the early 2000s.⁷ As part of the 2006 TANF reauthorization under the Deficit Reduction Act, Congress therefore reset the base year for the

caseload reduction credit to 2005, when caseloads had started to level off. This temporarily resulted in an increase in the targets that states needed to meet.

The reasoning behind the CRC is that states receive credit toward the WPR for individuals who combine work and welfare, and Congress was concerned that states should not be penalized when recipients leave welfare entirely. However, there has also been concern that the caseload reduction credit rewards states for pushing recipients off cash assistance, even if they do not have other sources of support. (While the caseload reduction credit received by the state is supposed to be adjusted to account for policy changes that have the effect of lowering caseloads, implementation practices are rarely included in this adjustment.)

Due to this concern, as part of the American Recovery and Reinvestment Act of 2009 (also known as the stimulus package), Congress added a temporary (and now expired) “hold harmless” to the caseload reduction credit for FYs 2009 through 2011.⁸ This provision was designed to ensure that states whose caseloads increased in response to the recession would not face higher required work participation rates as a result.

In addition, the CRC also allows states to receive credit for state spending above the minimum required under the maintenance of effort (MOE) requirement.

This provision, often referred to as “excess MOE,” was designed to ensure that states whose caseloads increased because of additional state spending were not penalized by a reduced caseload reduction credit.

While this provision was part of the original 1999 regulations implementing welfare reform, it did not receive much attention until after the reauthorization of TANF when the new baseline for the CRC and other changes made the work participation rate much harder to achieve. Some policymakers have expressed concern that the excess MOE provision weakens the effectiveness of the work participation rate, particularly when states claim third-party (non-governmental) expenditures as MOE. However, others have argued that the “excess MOE” provision has incentivized states to maintain spending on low-income families in the face of significant state budget deficits.⁹

As a result of the CRC, states face widely varying participation rate targets. In 2018, the most recent year for which data is available, 22 states had adjusted standards of 0 percent due to the caseload reduction credit, while 8 states had adjusted standards of 40 percent or higher. Therefore, Louisiana “passed” with a WPR of just 4.8 percent (and an adjusted target of 0 percent) while Montana failed with a WPR of 35 percent (but an adjusted

target of 37.8 percent).¹⁰

States Face Financial Penalties for Failure to Meet Target Rates

States that fail to reach the target WPR are subject to a financial penalty based on how far they fall short of the target rate. The maximum penalty in the first year a state misses the rate is 5 percent of the block grant, but it increases by 2 percent a year if states fail to achieve their target rates for multiple years in a row. States may avoid the financial penalty by submitting a “corrective compliance plan” that explains the steps they will take to bring their work participation rate up to the target level. If they succeed in bringing the rate up to their adjusted target, the penalties are waived. Penalties can also be partially waived for partial improvement.

Many states experienced large decreases in the CRC, and therefore large increases in their target rates, between FY 2012 and 2013. This was driven by the loss of the “hold harmless provision” as well as by changes to what types of spending could be claimed as MOE. As a result of these higher rates, the number of states identified by HHS as failing the WPR increased significantly. However, most of these states have since come into compliance and are no longer at risk of penalties.

One state failed to meet their target all-families rate and two-parent rate in 2018. This failure marks the first in a few years for Montana. The state faces a potential penalty as a result of the failure. It must now decide whether to request penalty relief, enter into the corrective compliance process, or accept the penalty. While states have to date only paid nominal amounts for failure to meet the WPR (primarily for failure to meet the higher two-parent rate), it can be politically embarrassing for states to be singled out as failing and to be at risk of losing millions of dollars in federal funds. Therefore, states generally pay close attention to their WPR and make great efforts to avoid falling short of their target rates.

Concerns about the WPR

Since TANF was created, there have been many concerns expressed about the work participation rate. Some of these are about the particular list of countable activities, while others are about the overall structure of the WPR.

Concerns about Countable Activities and Hours

The list of countable activities under the work participation rate does not include the full range of activities needed to respond to individual needs and circumstances. TANF recipients have a broad range of work histories and

personal experiences and are poorly served by one-size-fits-all approaches.

Education and training are only allowed as countable activities to a limited extent. Specifically, education and training are generally only countable when combined with at least 20 hours per week of another core activity, except during the one year for which vocational education can be counted as a core activity. Given the unpredictably shifting hours of many low-wage jobs, it can be particularly difficult for recipients to combine education and training with employment, and many are simply denied the opportunity to meet any of their participation requirements through education. In the face of an economy that increasingly requires a postsecondary credential for all but the lowest-paying jobs, this policy makes it harder for welfare recipients to escape poverty.

The WPR also makes it challenging for states to receive credit for providing appropriate activities to individuals with disabilities and other barriers to full participation. States do not receive partial credit for engaging recipients for less than the minimum required hours, even if they have modified the participation requirement as part of an accommodation required under the Americans with Disabilities Act. Barrier removal activities such as mental health services and substance abuse treatment are only

countable toward the work participation rate as part of “job search/job readiness,” which is only countable for a few weeks per year. Moreover, if part-time participation in such an activity is combined with other activities, it still uses up a full week of eligibility.

As more work-ready individuals are less and less likely to receive TANF cash assistance, individuals with significant challenges now constitute a substantial share of TANF recipients. Because of the mismatch between the needs and capacities of TANF recipients and the countable activities under TANF, many recipients do not participate in countable activities for the required number of hours.

Concerns about the Structure

The WPR measures whether states are tracking the participation of TANF recipients in countable activities. It does not distinguish between states that have low participation rates because they are doing a poor job of engaging recipients in any activity and states that have carefully assessed recipients and assigned some to reduced hours of participation or to activities that are not federally countable, such as full-time basic education.

As a process measure, the WPR focuses state attention on attendance, not on whether programs are effective in helping participants find and keep work. Because

the WPR is thus fundamentally different from the outcome measures used to evaluate programs under the Workforce Investment Act (WIA, now the Workforce Innovation and Opportunity Act or WIOA), the WPR can serve as a barrier to linking TANF programs to mainstream workforce programs.

In some states, caseworkers spend a significant portion of their time simply ensuring that all hours of participation were verified and documented so that they can count toward the WPR. One study of employment counselors in Minnesota found that they spent 53 percent of their TANF time on documentation activities, such as verifying, collecting, and reporting information for work participation rates, and only 47 percent on direct service activities, such as creating employment plans, identifying barriers to work, and assisting with job search.¹¹

Moreover, it is easier and cheaper for a state to improve its work participation rate by serving fewer families who need assistance, than to raise the WPR by running a more effective program. In the wake of the tightened rules under the DRA, the majority of states have adopted full-family sanctions, which have the effect of removing non-participating recipients from the caseload, and thus from the WPR. States particularly have little incentive to serve people with significant

barriers to employment who are likely to require more time and extensive services before they are able to participate at the levels needed to be counted toward the work participation rate. States with high WPRs may have achieved them by working hard to engage all recipients, or by placing hurdles to keep individuals with significant challenges out of the program.

Even the states that have maintained their commitment to both providing a cash assistance safety net and serving all TANF recipients with appropriate work activities recognize that these efforts are likely to be only minimally reflected in the work participation rate. These states, therefore, combine their work-focused efforts with backup strategies for ensuring that they do not become subject to WPR penalties, such as use of MOE, or providing extended supplemental benefits to low-wage workers who would otherwise lose TANF eligibility due to earnings.

States Have More Flexibility than Often Recognized

In general, states pay a great deal of attention to the participation rates, often using them as performance measures for employment services providers and are reluctant to assign recipients to activities that are not countable toward the federal rate. This remained true throughout the recent deep recession, even as

unemployment rates climbed and welfare recipients had to compete for jobs with many newly unemployed workers who had much greater skills and work experience.

However, states have more flexibility than is often recognized to allow participants to engage in a full range of work activities. Many state policies are more restrictive than the federal limits on countable activities; for example, some states assign nearly all non-exempt recipients to job search activities and do not permit them to engage in full-time vocational education for even the 12 months that is federally countable. Similarly, many states do not take advantage of the option to deem 18- and 19-year-olds as participating based on school attendance. In such states, simply offering recipients the full range of federally countable activities would be a step in the right direction.

States also have the option of allowing recipients to participate in activities that are not federally countable. Many states have such low effective target rates as a result of the CRC that they are in no danger of failing to meet their targets, even if they allow participants to engage in non-federally countable activities. States can also opt to provide assistance to certain individuals with state funds that are not claimed towards the MOE requirement, in order that these

individuals not be included in the work participation rate requirements.

Some states have in fact chosen to allow recipients to participate in a broader range of services, even when they are not countable toward the WPR. State policymakers believe that these activities will eventually result in more participants obtaining stable employment and no longer needing cash assistance. As the evidence base grows for the effectiveness of demand-driven job training and work-based learning, more states should take advantage of this flexibility.

TANF Waiver Proposal

In 2012, HHS issued an Information Memorandum (IM) inviting states to propose demonstration projects that could include waivers of the WPR in order to test changes that could “lead to more effective means of meeting the work goals of TANF.”¹² Congressional Republicans expressed deep opposition to this effort and suggested that, in spite of the emphasis on work in the IM, any waivers to the WPR would mean abandoning the work goals of TANF. In October 2015, Governor John Kasich of Ohio, a Republican, became the first to request a waiver.¹³ In August 2017, the Trump Administration rejected this request and issued new guidance formally withdrawing the 2012 IM.¹⁴

Some of the rhetoric around the waiver

proposal implied that the WPR is the only thing standing between current TANF policies and a return to AFDC. This is a ludicrous idea. Welfare offices have overwhelmingly adopted the message that TANF is a time-limited program, and that recipients should move towards employment as quickly as possible. Evidence of this is that the overwhelming majority of those states where the CRC has reduced the target rate to zero continue to impose work requirements

just as stringent as those states that must achieve higher targets.

So, what would change if the WPR were to be modified or eliminated? States would spend less time and effort documenting hours of participation, freeing up resources to spend on services. Some states would make few if any changes, while others would allow a greater range of activities aimed at economic security to count toward work requirements.

Table 1: Work Participation Rates by State

Combined TANF and SSP-MOE Work Participation Rates, FY 2018				Share of All individuals Counted as Participating in:			
State	Caseload Reduction Credit for All Families ¹⁵	Adjusted Standard for All Families ¹⁶	Work Participation Rate for All Families ¹⁷	Unsubsidized Employment for All Families ¹⁸	Subsidized Public Employment for All Families ¹⁹	Job Search ²⁰	Vocational Education ²¹
Alabama	50.0%	0.0%	54.9%	79.7%	8.2%	2.1%	4.0%
Alaska	23.0%	27.0%	44.8%	79.9%	0.0%	25.4%	5.1%
Arizona	50.0%	0.0%	20.5%	80.0%	0.0%	13.6%	7.5%
Arkansas	50.0%	0.0%	31.2%	85.8%	0.8%	2.8%	7.1%
California	0.0%	50.0%	56.9%	83.4%	1.9%	16.5%	7.2%
Colorado	35.4%	14.6%	33.6%	60.8%	0.0%	33.5%	20.3%
Connecticut	47.6%	2.4%	25.8%	58.3%	0.3%	62.4%	5.2%
Delaware	50.0%	0.0%	27.0%	88.2%	0.0%	10.8%	5.9%
District of Columbia	30.2%	19.8%	50.0%	76.3%	0.7%	23.2%	7.9%
Florida	26.2%	23.8%	38.7%	54.2%	0.1%	27.0%	21.7%
Georgia	50.0%	0.0%	4.8%	37.1%	1.0%	20.6%	10.3%
Hawaii	50.0%	0.0%	34.1%	89.3%	2.1%	5.5%	4.4%
Idaho	0.0%	50.0%	60.9%	39.4%	0.0%	51.5%	18.2%
Illinois	38.0%	12.0%	65.1%	98.6%	0.0%	1.7%	0.7%
Indiana	50.0%	0.0%	30.7%	95.3%	0.0%	1.8%	0.9%
Iowa	50.0%	0.0%	33.4%	91.2%	0.5%	4.0%	6.4%
Kansas	50.0%	0.0%	38.0%	89.8%	0.9%	2.8%	7.5%
Kentucky	41.1%	8.9%	52.5%	62.5%	0.0%	1.1%	7.6%
Louisiana	50.0%	0.0%	4.8%	68.8%	0.0%	10.1%	25.7%
Maine	0.0%	50.0%	90.7%	97.3%	0.0%	4.0%	1.8%
Maryland	38.0%	12.0%	28.0%	43.2%	0.3%	20.2%	12.8%
Massachusetts	19.2%	30.8%	66.8%	95.7%	0.0%	1.6%	2.8%
Michigan	50.0%	0.0%	60.2%	70.3%	5.0%	26.2%	11.9%
Minnesota	36.9%	13.1%	37.2%	86.4%	0.1%	9.3%	7.5%
Mississippi	0.0%	50.0%	51.7%	49.5%	0.0%	5.2%	18.0%
Missouri	50.0%	0.0%	24.8%	85.9%	0.9%	7.1%	5.5%
Montana	12.2%	37.8%	35.0%	68.3%	1.1%	6.7%	13.9%
Nebraska	50.0%	0.0%	44.4%	90.5%	0.1%	2.9%	7.7%
Nevada	22.4%	27.6%	38.2%	96.9%	0.0%	0.8%	1.3%
New Hampshire	0.0%	50.0%	70.3%	93.7%	0.0%	4.8%	2.5%
New Jersey	50.0%	0.0%	27.8%	52.7%	0.0%	4.6%	25.2%
New Mexico	50.0%	0.0%	51.1%	60.8%	0.0%	25.4%	10.6%
New York	41.2%	8.8%	24.6%	87.8%	0.0%	0.6%	7.2%

North Carolina	42.5%	7.5%	24.7%	46.0%	0.5%	48.1%	13.1%
North Dakota	50.0%	0.0%	68.7%	73.5%	0.0%	8.3%	12.7%
Ohio	23.4%	26.6%	44.4%	65.3%	1.3%	3.7%	12.6%
Oklahoma	42.9%	7.1%	34.5%	37.4%	0.0%	18.4%	36.5%
Oregon	0.0%	50.0%	68.6%	98.5%	0.2%	0.7%	0.4%
Pennsylvania	49.2%	0.8%	23.2%	85.0%	0.9%	7.2%	12.0%
Rhode Island	50.0%	0.0%	8.2%	90.0%	0.0%	12.1%	5.6%
South Carolina	50.0%	0.0%	43.5%	84.5%	0.4%	8.0%	8.7%
South Dakota	0.0%	50.0%	58.6%	28.9%	6.4%	14.2%	7.4%
Tennessee	50.0%	0.0%	31.2%	88.1%	0.0%	5.5%	6.5%
Texas	50.0%	0.0%	17.9%	87.4%	3.1%	0.0%	0.0%
Utah	50.0%	0.0%	10.0%	86.9%	0.7%	6.5%	11.1%
Vermont	39.6%	10.4%	47.0%	91.6%	0.0%	3.5%	1.2%
Virginia	44.2%	5.8%	36.8%	79.7%	0.0%	17.3%	6.9%
Washington	46.3%	3.7%	50.4%	88.6%	0.0%	4.8%	2.7%
West Virginia	40.2%	9.8%	36.9%	50.6%	0.7%	10.3%	31.5%
Wisconsin	34.0%	16.0%	44.1%	41.0%	0.1%	29.1%	9.6%
Wyoming	0.0%	50.0%	73.3%	28.9%	0.0%	6.1%	8.9%

NOTE: Share of work activity calculations reflect the number of work-eligible individuals divided by the number of families counted in the all families work participation rate. Share of work-related activities in each state may be equal to or exceed 100% due to countable participation in multiple activities.

Subsidized Employment & On-the-Job Training includes subsidized public employment, subsidized private employment, and on-the-job training.

Education and Training includes vocational education, jobs skills training, education related to employment, and satisfactory school attendance.

All Other Work-Related Activities include work experience, community service, providing child care, and other miscellaneous activities.

Endnotes

¹ There are 16 penalties under the TANF program; however, the others are for failure to have certain policies in place or failure to meet MOE requirements, rather than for what states achieve with families receiving services or benefits. See *Section 409* of the Social Security Act for the full list of penalties:

http://www.ssa.gov/OP_Home/ssact/title04/0409.htm.

² States are required to spend their own funds on services or benefits for needy families at a level based on their historic spending on AFDC prior to the creation of TANF. For more information, see: Elizabeth Lower-Basch, *TANF 101: Block Grant*, CLASP, 2019, <http://www.clasp.org/resources-and-publications/publication-1/TANF101-Block-Grant.pdf>.

³ The Federal definition of a work eligible individual excludes certain parents who are not on assistance from this definition: SSI or Social Security Disability recipients at state option on a case-by-case basis, ineligible immigrants, and parents providing care for a disabled family member who lives in the household and whose care requires the parent to stay home. However, parents removed from the case due to time limit or sanctions are still work eligible individuals. Non-parental relative caregivers who are not receiving assistance themselves are not included.

⁴ States may count 12 weeks of job search and job readiness during months in which they qualify as “needy states” on the basis of either high unemployment rates or food stamp (SNAP) caseloads. Most states currently qualify based on SNAP caseloads. See: Office of Family Assistance, *States Qualifying for Counting Up To Six Additional Weeks of Job Search and Job Readiness*, Administration for Children & Families, U.S. DHHS, March 23, 2016, <http://www.acf.hhs.gov/programs/ofa/resource/12wks-qualifiers>.

⁵ Office of Family Assistance, “TABLE 1A - Combined TANF and SSP-MOE Work Participation Rates Fiscal Year 2018,” U.S. Department of Health & Human Services, June 2019, https://www.acf.hhs.gov/sites/default/files/ofa/wpr2018_web_working_508_table_1a.pdf.

⁶ Office of Family Assistance, “TABLE 1A - Combined TANF and SSP-MOE Work Participation Rates Fiscal Year 2017,” U.S. Department of Health & Human Services, June 2018, <https://www.acf.hhs.gov/sites/default/files/ofa/wpr2017table01a.pdf>.; Office of Family Assistance, *TANF: Eleventh Report to Congress*, 2016, <https://www.acf.hhs.gov/ofa/resource/eleventh-report-to-congress>.

⁷ Thus, in FY 2006, the national average participation rate was 32.5 percent, with states achieving rates from 15.2 percent to 77.2 percent, but only one state failed to achieve its adjusted target rate. Office of Family Assistance, *TANF: Eighth Annual Report to Congress*, June 2009.

⁸ Under this provision, in FYs 2009, 2010, and 2011, a state had the option to use the regular caseload reduction credit, or to use the credit it qualified to receive based on the FY 2007 or FY 2008 caseload, whichever was lower.

⁹ U.S. Government Accountability Office, *TANF: State Maintenance of Effort Requirements and Trends*, May 17, 2012, <http://www.gao.gov/products/GAO-12-713T>. In 2008, the Bush Administration proposed to eliminate excess MOE through regulation, but this proposed rule was later withdrawn.

¹⁰ Office of Family Assistance, “Table 1A - Combined TANF and SSP-MOE Work Participation Rates, Fiscal Year 2018,” June 2019,

https://www.acf.hhs.gov/sites/default/files/ofa/wpr2018_web_working_508_table_1a.pdf .

¹¹ Dani Indovino, et al., *The Flexibility Myth: How Organizations Providing MFIP Services are Faring Under New Federal Regulations*, Hubert H. Humphrey Institute of Public Affairs, University of Minnesota, 2008.

¹² Office of Family Assistance, “TANF-ACF-IM-2012-03 (Guidance concerning waiver and expenditure authority under Section 1115),” 2012,

<http://www.acf.hhs.gov/programs/ofa/resource/policy/imofa/2012/im201203/im201203>.

¹³ Catherine Candisky, "Ohio wants easing of federal welfare-to-work rules," *The Columbus Dispatch*, November 2015, <http://www.dispatch.com/content/stories/local/2015/11/02/easing-ofwork-rule-requested.html>.

¹⁴ U.S. Department of Health and Human Services, "TANF Information Memo," August 2017, http://www.acf.hhs.gov/sites/default/files/ofa/tanf_acf_im_2017_01.pdf.

¹⁵ Office of Family Assistance, "Table 2 - Caseload Reduction Credits," U.S. Department of Health & Human Services, June 2019, <https://www.acf.hhs.gov/ofa/resource/work-participation-rates-fiscal-year-2018-0>.

¹⁶ Office of Family Assistance, "Table 1A - Combined TANF and SSP-MOE Work Participation Rates Fiscal Year 2018," U.S. Department of Health & Human Services, June 2019, <https://www.acf.hhs.gov/ofa/resource/work-participation-rates-fiscal-year-2018-0>.

¹⁷ Ibid.

¹⁸ Office of Family Assistance, "Table 4B - Percentage of Work-Eligible Individuals Participating in Work Activities for Sufficient Hours for the Family to Count as Meeting the All-Families Work Requirement Monthly Average, Fiscal Year 2018," U.S. Department of Health & Human Services, June 2019, <https://www.acf.hhs.gov/ofa/resource/work-participation-rates-fiscal-year-2018-0>.

¹⁹ Ibid.

²⁰ Ibid., 20.

²¹ Ibid., 20.