

Appendix A

1. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection activity. This notice was published on June 27, 2023, Volume 88, Number 122, page 41644, and provided a 60-day period for public comment.

The comments received from four states and their associated responses are detailed below. Several comments brought to our attention that the revised Work Verification Plan (WVP) guidance that was submitted as part of the Federal Register notice did not reflect changes that had been made between the interim final rule of 2006 and the final rule of 2008. We have made edits to the WVP guidance in response to these comments and to reflect current regulations.

Work Verification Plan Guidance

1. Comment re: Unsubsidized employment, self-declaration/self-employment

- a. Pg 3: Discussion on self-declaration of hours for participants completing a self-employment activity. How would we guide our participants currently completing this activity in reporting their hours completed within this activity? Current guidance in New Mexico is based on income earned, minus expenses, divided by federal minimum wage; however, it is not guaranteed that a participant was engaged in a meaningful work activity that will lead to self-sufficiency based on income submittal alone. Basing hours completed simply on income does not benefit the participant or their ability to succeed in the program as many will self-report just the bare minimum of income to meet the hour guidelines, not their full income earned.

ACF Response: There was no change in our guidance on this topic. We do not accept self-reported hours for self-employment. The net income divided by the federal minimum wage was deemed to be an acceptable proxy. We also note, "The state may also describe an alternative methodology to count and verify hours a client is engaged in self-employment."

- b. Utah would encourage more flexibility than the updated guidance indicates for self-employment. Often, when a TANF participant begins self-employment they need to be self-employed for a period of time in order to provide the detail necessary to determine hours based on gross income less expenses divided by minimum wage. A customer pursuing an opportunity with self-employment who is actively engaged in the initial month should be considered participating. Without this flexibility, it would cause an additional burden on self-employed individuals to meet participation hours.

ACF Response: There was no change in our guidance on this topic. This would require a change in regulation and is beyond the scope of this guidance. Please refer to 45 CFR 261.60(d).

2. Comment re: Unsupervised Homework Time

- a. The proposed draft Work Verification Plan Guidance (TAB D) asserts that a client's engagement in unsupervised homework time may not be counted towards meeting the Work Participation Rate. This is in contrast to [45 CFR §261.60\(e\)](#), which states that *1 hour of unsupervised homework time for each hour of class time may count as work participation hours*. Yet, the draft guidance presents the opposing view, stating throughout the document that unsupervised homework time may not count and that only supervised activities are countable towards the Rate. Washington respectfully requests that these references be made consistent with current, prevailing federal regulation. This ensures clear guidance to states and that effort made by TANF clients successfully engaged in education activities is fully considered for purposes of the Work Participation Rate.

ACF Response: We have corrected this as part of updating the WVP guidance to reflect the current regulation. We added "States may also count up to one hour of unsupervised homework time for each hour of class time."

- b. Pg 11: There are concerns in what is countable towards Vocational Training activities. Guidance states that we cannot count unsupervised study or homework time. Many learning institutions outline that there is an expected minimum of outside classroom hours that a student should complete to be successful within their program. By not allowing these hours, this would create an undue hardship on the participant by either not allowing them to be successful in reaching their educational goals while in our program or possibly discourage the participant from working with their local TANF program by placing them in an activity that they are not able to successfully complete due to their commitment to their education.

ACF Response: We have corrected the document to reflect the current regulation. We added "States may also count up to one hour of unsupervised homework time for each hour of class time" to conform with the final rule of 2008.

- c. Pg 35: Would like to include homework/study time for this activity as well. While it is a non-core activity, it is still an educational activity that focuses on gaining the knowledge needed to reach self-sufficiency. If homework/study time were allowed by the institution for success, would this be countable?

ACF Response: This is just an example, but we added "States may also count up to one hour of unsupervised homework time for each hour of class time" to the guidance conform with the current regulation.

- d. (Utah) I. Countable Work Activities General Plan Documentation Guidance #4.
While this guidance remains the same and has not been changed from previous guidance. We would ask that the guidance provided under the [Q&A: Counting and Verifying Hours of Work Participation](#) question and answer number four, allowing one hour of unsupervised homework time for each hour of class time, provided that total homework time counted does not exceed the hours required or advised by the particular educational program remain valid. Utah has utilized educational institutions standards for determining reasonable and acceptable amounts of unsupervised study time within this guidance and encourages the ability to continue to do so. The ability to count this limited unsupervised time allows participants success in their schooling without adding the additional burden of trying to gain more hours to meet participation through other means. For participants that are attending school, the additional burden of not having this

flexibility would disincentivize participants from attending school due to the additional obstacles obtaining supervised study time would create.

ACF Response: We have corrected this as part of updating the WVP guidance to reflect the current regulation. We added “States may also count up to one hour of unsupervised homework time for each hour of class time.”

3. Comment re: Excused Absence Calculation

- a. How excused absences should be calculated in regards to work participation hours within the proposed draft Work Verification Plan Guidance (TAB D) appears to be inconsistent with [45 CFR §261.60\(b\)](#), which allows for “up to 80 hours of additional excused absences...”. The proposed guidance asserts that the “...absence policy cannot be converted to an hourly standard (e.g., 10 days cannot be converted to 80 hours).” Washington respectfully requests that this reference be made consistent with current, prevailing federal regulation. This ensures clear guidance to states and that effort made by TANF clients successfully engaged in activities is fully considered for purposes of the Work Participation Rate.

ACF Response: We have corrected this as part of updating the WVP guidance to reflect the current regulation. We have deleted the language “...absence policy cannot be converted to an hourly standard (e.g., 10 days cannot be converted to 80 hours)” and added “The Deficit Reduction Act Final Rule enhanced state flexibility by allowing a state to account for ‘excused hours’ rather than an ‘excused day’” to the guidance.

- b. The interim final rule contradicts the directions in the ACF-199 Data Reporting Instructions. On page 22 of the Data Reporting Instructions, it states: “For participation in unpaid work activities, it may include excused absences for hours missed due to a maximum of 10 holidays in the preceding 12-month period and **up to 80 hours of additional excused absences** in the preceding 12-month period, no more than 16 of which may occur in a month, for each work-eligible individual.” However, the guidance in the Work Verification Plan explicitly states that the state cannot convert to 80 hours.

NM strongly believes that the requirement should continue to be 80 hours and not 10 days. By utilizing 80 hours, participants utilize hours as they would in a paid employment situation that offers paid sick leave. An employee would not need to take a day off when only a few hours are required.

Additionally, instituting a change from 80 hours to 10 days will involve enormous expense for the state to reprogram the current case management system which tracks the use of the hours. States would require additional federal administrative funding to implement this update. Without additional funding, many states will have a delay in implementation.

ACF Response: The original WVP guidance came out before the final rule and we inadvertently did not reconcile the differences here. The instructions are correct in this case: states can count up to 80 hours in the preceding 12 months, with no more than 16 hours per month, but the number of days is not restricted. See answer above.

- c. *Excused Absences*-New criteria “the 10-day excused absence policy cannot be converted to an hourly standard (e.g., 10 days cannot be converted to 80 hours). Any absence for any part of the day counts as one of the days available for excused absences.” NM suggests this

remain at 80 hours.

ACF Response: Please see answer above.

- c. Pg 14: The interim rule defines that a participant may not utilize more than 10 days of excused time, while ACF 199 & 209 outlines that a participant may not exceed 80 hours of excused time. This is confusing and may need to be reviewed, as 10 days vs 80 hours are different expectations. I request to keep this at 80 hours; many employers utilize sick hours instead of sick days. There are times where a participant may be able to complete a partial day of activities instead of the full required hours for that day and need to excuse the remainder of the time for a qualifying excused reason; hour requirements are also based on weekly hours, not days.

ACF Response: Please see answer above.

- d. (Utah) II. Hours Engaged in Work, Excused Absences.
Utah is concerned with the updated guidance to not allow an hourly conversion of the 10 days of excused absences. Most unpaid activities are part-time, less than 8 hours, and this limitation would cause a burden on participants. Often the ability to excuse absences, by hours, allows more participation by TANF recipients. With this stricter guidance, it would disincentivize participants from completing other hours in the day than they would be able to reasonably participate otherwise. By allowing the flexibility to excuse the 10 days by hours, it would encourage a family friendly approach to participation and full participation as a TANF recipient wouldn't lose a full day's hours of participation if they opted to utilize an excused absence. Not allowing for excused hours to match the number of hours a customer is expected to participate is not an accurate reflection of what is being excused.

ACF Response: Please see answer above.

4. Comment re: Vocational Education Training Programs

- a. Washington requests clearer guidance within the proposed draft Work Verification Plan Guidance (TAB D) on how vocational educational training programs should be outlined in work verification plans. Vocational training and certificates vary significantly throughout the state by region, locale, and over time with employment market fluctuations. It appears that in order for engagement in vocational education to be counted towards the work participation rate, states must list all vocational training and certificate programs which they engage participants in. This is both impracticable and would result in much more frequent updates to the work verification plan, which impacts both state and federal partners. Washington asks that the guidance be clarified to indicate that the training example is not meant to be prescriptive and that states have flexibility in this area.

ACF Response: This example is meant to be illustrative, not prescriptive. However, to avoid confusion, we have removed the detailed list of certificate programs.

- b. Pg 33 & 34: The outlined allowable education for countable vocational training activities is lacking. The limits placed on what educational paths a participant is able to utilize for their core activity does not encompass the full range of educational offerings that will lead to a greater sense of self-sufficiency. Certain allowable courses have been shown to not be successful in the current labor market, while there are other educational paths that would lead to better success and end not only generational poverty but help to prevent the 'benefit cliff' that many of our participants worry about experiencing when looking for employment.

ACF Response: This example is meant to be illustrative, not limiting. We permit a wide range of educational activities as vocational educational training.

5. Comment re: Federal Holidays

[45 CFR §261.60\(b\)](#) and the proposed draft Work Verification Plan Guidance (TAB A) both reference 10 federal holidays. There are now 11 federally recognized holidays, including Juneteenth which was made a federal holiday by the Juneteenth National Independence Day Act in 2021.

ACF Response: The number of holidays for TANF are defined in regulation, so any change to the number of holidays is beyond the scope of this revision to the WVP guidance.

6. Comment re: Work Experience

Guidance-FLSA determination is with DOL; Does this mean states can no longer assume that all unpaid activities will be subject to FLSA?

ACF Response: *The only unpaid activities potentially subject to FLSA are work experience and community service.* DOL has always been the agency to interpret the applicability of FLSA to specific work placements. To make this clearer, we revised the WVP guidance to say “It is the purview of the Department of Labor to determine whether or not the FLSA applies to a particular work experience activity. Any questions regarding the FLSA should be directed to the Wage and Hour Division of the U.S. Department of Labor at 1- 866-4-USWAGE or the following web site: <https://www.dol.gov/agencies/whd/flsa>.”

7. Comment re: attendance records

- a. Pg 31: Attendance records are required for participants in a job readiness activity. It states that other activities require attendance records if only servicing TANF participants, but does not specify that for this case.

ACF Response: This is just an example. To avoid confusion, we added “For job readiness activities of TANF participants”

- b. Attendance Records—is there a concern with requiring attendance records for classes offered for TANF participants only in regards to the management of their case files and HIPAA? The case of record must include all documents required to show verification that hours were met, but by providing the attendance record for the class, would this fall into a violation by uploading documents that have several participants’ names that are not associated to the case?

ACF Response: We don’t see how this would be a HIPAA concern, but the example does not suggest submitting names of other classmates. Again, this is just an example.

8. Comment re: biweekly verification

Another point regarding verification of activities—many activities are requiring verification of non-paid activities by submitted on a biweekly basis, not a monthly basis. Is there a worry that this could cause an undue hardship on low-income families by requiring them to submit verification of completed hours more frequently than monthly? All activities currently require signatures on timesheets, but what of those activities that may take place online, such as online classes for Vocational Training? Are there any additional verifications that can be accepted, such as collateral

contact with worksites/schools, etc? Can we verify signatures for site supervisors/participants via phone for timesheets, for those that may live too far from a field office to submit or complete in person?

ACF Response: The standards for reporting have not changed. We don't require biweekly submissions; monthly is acceptable as is a system involving telephonic verification. This is just an example.

9. **Comment re: job search and job readiness**

I. Countable Work Activities, Job Search and Job Readiness Assistance Guidance, last bullet. Utah would like clarification on what is meant by the term proxy in relation to job application or interviews for standard set hours of participation. It is unclear as to the intent with this guidance.

ACF response: A state cannot convert number of job applications or interviews to hours; it must report actual hours. We added "number of" to avoid confusion.

ACF-199/209 Data Report Layout

Comment re: "no longer in use"

Regarding TANF&SSP Data Report Layout (TAB J) in the TANF SECT2 PERSON tab, there are two items that are no longer in use, which are not indicated as such. We understand that item #23's description (row 29, col B) should note that the item is "NO LONGER IN USE" and its example of contents should be 0 (row 29, col G). Similarly, for item #27, the description (row 33, col b) should indicate that the item is "NO LONGER IN USE" and its example of contents should be 00 (row 33, cols G and H).

ACF Response: This is now fixed.

ACF-199 TANF and ACF-209 SSP-MOE Data Reporting Instructions

1. **Comments re: cost-burden**

Our primary concern is with the burden of these proposed changes due to what appears to be coding changes of the answers to many questions. See the attached spreadsheet documenting the questions where the coding may be changed. At a high level, a maximum estimate of implementing these changes is 3,500-4,000 IT hours, which implies a cost of up to \$368,000 for the State of Wisconsin to implement. Note:

- 1) This estimate includes only IT staff time for changes to the data extraction process and does not include other staff time that may be needed.
- 2) Our estimates are rather uncertain because we are not clear if coding changes would be required for some items. In the attached spreadsheet, those marked at level 3 appear to require coding changes while some of those marked at level 2 may or may not require coding changes.

Regarding necessity, the streamlining of the instructions in each section (such as moving some narratives to the appendix) and modernizing terms and language do appear important in improving clarity. However, it is not clear to us that the coding changes are necessary from our point of view. There does not appear to be large gains in data quality nor obvious benefits

in our ability to monitor the program and participant outcomes based on the proposed coding changes.

ACF Response: We appreciate you sharing these concerns. In revising the instructions, we took extra care to substantively change as little as possible. For example, we did not delete any data elements from the report layout, but instead changed them to “Item no longer in use; enter code ‘0’”. The intent of this was to give states the option of skipping these items that are not used for work participation calculations, reporting, or any other purpose, without requiring changes to data systems. If a state enters a code other than “0” for any of these items no longer in use, they will not receive an error; that entry will simply be ignored.

The only instances in which substantive changes were made were when the code options no longer made sense and/or created data integrity issues. As part of the rollout of these new instructions, OFA will provide technical assistance and guidance as to which data elements involve substantive coding changes.

2. Comments re: Gender data item

- a. The proposed draft ACF-199&209 TANFSSP Data Report Instructions (TAB G) for gender coding include the options “M”, “F”, “Non-Binary”, “Uses a different term”, and “Refused”. This does not align with how Washington’s legacy eligibility system is currently configured to capture this data. It would be helpful to also include an “Unknown” category for gender. The “Refused” category does not adequately crosswalk to Washington’s current system infrastructure.

ACF Response: We have changed Option #5 to read “Unknown or refused, prefer not to say.”

- b. Regarding accuracy, we do not anticipate having the new values for Gender soon (“Non-Binary or gender non-conforming”, “Uses a different term”), which applies to items TANF Section 1 [#35, #71], TANF Section 2 [#18, #31], SSP-MOE Section 1 [#31, #64], and SSP-MOE Section 2 [#17].

ACF Response: We have added options to accommodate a more expansive list of responses. If your state does not have additional values, you may keep reporting as you have been.

3. Comment re: Item 9: Disposition (Page 5)

Enter 1 to indicate that the data reported is complete and accurate. States that submit sample data should not report cases that are “listed-in-error”.

- a. NM pulls a sample of active TANF cases monthly; how will states handle cases that were selected in error? There are instances when a case pulled in the sample will have the TANF grant benefit recovered due to an agency or client error or the TANF grant is solely support services for a specific month. Typically, NM codes those cases as listed in error and the case is disregarded from the work participation rate calculation. How will these types of situations be handled in the future?

ACF Response: This case should be removed from the sample when the data file is resubmitted and does not need to be listed in error.

We need a random sample of those who would not be listed in error. States should ideally exclude those cases before they sample and should sample more than minimum required cases each month in order to maintain a sufficient sample when such cases are removed.

- b. Pg 9: For submittal of sample data, it is noted that we are removing the 'listed in error' option. This was the option utilized for cases that are pulled in error for not receiving a TANF benefit for the month of review or were found to be ineligible for TANF during the month of review and are in the process of returning the TANF grant payment back to the issuing department. Will states still be allowed to submit cases that were pulled incorrectly? Or will these simply not be included on our overall sample data (i.e., the cases that were randomly selected for sample)?

ACF response: States should not submit cases that were pulled incorrectly. Cases pulled incorrectly should be removed from the sample when the data is resubmitted and do not need to be listed in error.

4. Comments re: Item 49: Work Participation Status (Page 21)

- a. *Work Participation Status: 07 = Excluded from two-parent work participation rate, disabled (using the state's definition of "disabled")*.

NM Comment:

Currently a client with a work participation status of 07 was simply "exempt, disabled." The proposed new definition of a code 07 is "excluded from the two-parent work participation rate." Will that continue to be an acceptable code for a single parent household with a state approved disability waiver?

ACF Response: Please be advised that we edited the options to reflect only the information that is necessary for the calculation of the WPR.

The former language for code 07 was misleading. There has never been an exemption for single-parent families who are disabled beyond what in the definition of work-eligible individual (WEI). In the case you describe above with single-parent household with a state approved disability waiver, the single parent would either be:

1. Not a WEI (#48 == 09 No, not a WEI because a parent caring for a disabled family member in the home (code consistently with response to item #39 =1 or 2), in which case #49 == 99, OR
2. A WEI if they don't meet the above definition, in which case they would not be disregarded from the work rate and therefore #49 should be 18.

To further clarify based on your question, we will revise option 18 only:

~~18 = Not disregarded;~~ required to participate but not meeting minimum participation requirements. ~~and none of the above options apply.~~

~~19 = Not disregarded; required to participate and meeting minimum participation requirements.~~

- b. Comment re: Code 08, used by NM to designate a mandatory client who has an approved federal caretaker waiver, has been removed and does not appear as a valid work participation status. Was the intention to remove the federal caretaker waiver as an approved status? And how will these waivers be reflected on the ACF-199?

ACF Response: Same as our answer above, caretakers who take care a disabled family member can be considered:

1. NOT a WEI (#48 == 09 No, not a WEI because a parent caring for a disabled family member in the home (code consistently with response to item #39 =1 or 2)), in which case #49 == 99, OR
2. A WEI if they don't meet the above definition, in which case they would not be disregarded from the work rate and therefore #49 should be 18.

5. Comments re: Items 63: Number of Deemed Core Hours for Overall Rate (Page 26)

States no longer need to report this, the number of deemed core hours for overall rate will be automatically calculated and added if a work-eligible individual participates in these activities the maximum number of hours permitted under the minimum wage provision of the Fair Labor Standards Act (FLSA) and the maximum hours do not fulfill the "core" hour participation requirement, we will "deem" the core hour requirement to be met.

- a. To be clear, states will code the work participation status as meeting if the state believes the case would be "deemed" to the core hours; however, the hours reported would be less than the required hours to meet the work participation rate.
- b. Pg 57 & 58: For cases that are deemed hours due to FLSA, it is requested that we no longer reporting the hours that were deemed. How these cases will be submitted is a little confusing, as the hours reported will appear to be short of the required weekly hours due to the missing 'deemed' hours.

ACF Response: Whether the state believes that the case would meet the required hours by adding the deemed hours or not, Work Participation Status (item #49) should be 18 (required to participate). OFA checks whether the hours (including deemed hours) meet the rate and informs the state if there is a discrepancy.

6. Comment re: Item 64: Number of Deemed Core Hours for the Two-Parent Rate (Page 27)

States no longer need to report this; the number of deemed core hours for the two-parent rate will be automatically calculated and added if these two-parent work-eligible individuals participate in these activities the maximum number of hours permitted under the minimum wage provision of the Fair Labor Standards Act (FLSA) and the maximum hours do not fulfill the "core" hour participation requirement, we will "deem" the core hour requirement met. Enter 00.

NM Comment:

Again, to be clear, states will code the work participation status as meeting if the state believes the case would be "deemed" to the core hours; however, the hours reported would be less than the required hours to meet the work participation rate. If both adults were in an unpaid work activity, ACF will add the "deemed" hours to one adult to ensure that the case would meet both the All- Family rate and the Two-Parent Rate or will ACF divide the deemed hours between both adults which may cause the case to not meet the All-Family rate?

ACF Response: For the overall rate, all WEIs who are eligible for deemed hours will have the

deemed hours. We will use the adult who had the most hours (after applying deemed hours for the all-families WPR) to represent that family's all-families work participation status.

For a two-parent family, if the family met all the two-parent family deemed criteria, the deemed hours for the two-parent family rate will be applied as follows:

$$\text{Two-parent deemed hours} = (\text{two-parent family required core hours}) - (\text{both parents' Community Service} + \text{Work Experience hours}).$$

There is no need to add to one parent or split between them because two-parent deemed core hours will be added to the family.

Updates to ACF-199 and 209 TANF & SSP Data Report Instructions (TAB_F):

Changes are in blue. Explanations are in red.

TANF Data Report | Section One

Item #8: Funding Stream

We changed the two options into three to make each option mutually exclusive:

1 = Funded, in whole ~~(or in part)~~, with federal TANF funds

2 = Funded entirely from segregated state maintenance-of-effort (MOE) funds

3 = Funded with both federal TANF and state MOE funds

Item #12: Type of Family for Work Participation:

We added one sentence to make the definition/explanation clearer.

A state may choose whether a two-parent family with a noncustodial parent as one of the two parents is a two-parent family for the purposes of calculating the two-parent work participation rate.

Change also applied to SSP-MOE Section 1 #9.

Item #15: Receives Assistance from the Supplemental Nutrition Assistance Program (SNAP):

We will use the dollar amount reported in item #16 to determine whether a family received SNAP or not, thereby eliminating potential discrepancies between item #15 and #16.

Item no longer in use; enter 0.

Change also applied to SSP-MOE Section 1 #13.

Item #16: Amount of Supplemental Nutrition Assistance Program (SNAP) Benefits

We spelled out "SNAP" due to deletion of item #15.

Change also applied to SSP-MOE Section 1 #14.

Item #17: Received Subsidized Child Care:

We will use the dollar amount reported in item #18 to determine whether a family received subsidized child care or not, thereby eliminating potential discrepancies between items #17 and #18.

Item no longer in use; enter 0.

Change also applied to SSP-MOE Section 1 #15.

Item #18: Amount of Subsidized Child Care:

We added the explanation of Subsidized Child Care due to the deletion of item #17

Subsidized child care means a grant funded in part or whole, by the federal, state or local government to or on behalf of a parent (or caretaker relative) to support the cost of child care services provided by an eligible provider to an eligible child. The grant may be paid directly to the parent (or caretaker relative) or to a child care provider on behalf of the parent (or caretaker relative).

Change also applied to SSP-MOE Section 1 #16.

Item #35: Gender: Enter the one-digit code:

We added "unknown" to option #5 based on the comment from Washington state.

1 = Male

2 = Female

3 = Non-Binary or gender non-conforming

4 = Uses a different term

5 = Unknown or refused, prefer not to say

Changes also applied to TANF Section 1 #71, TANF Section 2 #18, SSP-MOE Section 1 #31 and #64, SSP-MOE Section 2 #17

Item #39: Parent with Minor Child in the Family:

We added back the explanation below to clarify who should be coded as 1 or 2.

A parent with a minor child in the family may be a natural parent, adoptive parent, or step-parent of a minor child in the family. Reporting of this item is required for individuals whose family affiliation (item #30) code is 1 or 2. Optional for individuals whose family affiliation code is 3 or 5; if so, enter 0. Enter the one-digit code that indicates the adult's parental status.

This item is used in determining the two-parent work participation rate. If item #12, Type of Family for Work Participation, is coded "2", there should be two parents coded "1" for this item (regardless of whether the family is disregarded from the two-parent families participation rate via item #49, Work Participation Status). If a state chooses to exclude a two-parent family with

a noncustodial parent as one of the parents from the two-parent work participation rate, the State must code the data element "Type of Family for Work Participation" with a "1

We added back the distinction between options 1 and 2 because the distinction is necessary for the calculation of the work participation rate.

Instruction: Enter the one-digit code that indicates the adult's (or minor child head-of-household's) parental status.

- 1 = Yes, a parent with a minor child in the family and used in two-parent participation rate
- 2 = Yes, a parent with a minor child in the family, but not used in two-parent participation rate
- 3 = No, not a parent with a minor child

Changes also applied to SSP-MOE Section 1 #35.

Item #48: Work-Eligible Individual Indicator:

We added one more option

09 = No, not a WEI because a parent caring for a disabled family member in the home (code consistently with response to item #39 =1 or 2)

11 = No, not a WEI because a minor parent who is not head-of-household (code consistently with age <19 and item #38 not equal to 1)

Changes also applied to SSP-MOE Section 1 #41.

Item #49: Work Participation Status:

Revised to make options more clearly mutually exclusive.

18 = ~~Not disregarded; Required to participate but not meeting minimum participation requirements; and none of the above options apply.~~

~~19 = Not disregarded; required to participate and meeting minimum participation requirements.~~

Changes also applied to SSP-MOE Section 1 #42.

ADULT WORK PARTICIPATION ACTIVITIES

For the purposes of calculating the work participation rates for a month, actual hours may include the hours for which an individual was paid, including paid holidays and sick leave. For participation in unpaid work activities, it may include excused absences for hours missed due to a maximum of 10 holidays in the preceding 12-month period and up to 80 hours of additional excused absences in the preceding 12-month period, no more than 16 hours of which may occur in a month, for each work-eligible individual.

Each state must designate the days that it wishes to count as holidays for those in unpaid activities. It may designate no more than 10 such days. In order to count a holiday or an additional excused absence

Change also applied to SSP-MOE Section 1.