



# Interim Final Rule on TANF Work Outcomes Measures

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*Implementing Section 304 of the Fiscal  
Responsibility Act*

July 24, 2024

# Introductions

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## POLL

Where are you joining from?

1. State/territory government
2. Local/county government
3. Non-governmental
4. Federal government

How would you describe your role (primarily)?

1. TANF policy
2. TANF data
3. TANF operations
4. Workforce or education
5. Advocacy/research
6. Other

# Fiscal Responsibility Act of 2023

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## Focus on Work Outcomes

Effective FY 2025

- Pilot Program (Section 302)
- Reporting of Work Outcomes (Section 304)

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## Work Participation Rate Changes

Effective FY 2026

- Caseload Reduction Credit Recalibration (Section 301)
- Elimination of “Small Checks Scheme” (Section 303)

# Work Participation Rate Changes

Effective FY 2026

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- Section 301 resets the base year for the caseload reduction credit (CRC) from FY 2005 to FY 2015.
- Section 303 requires that states provide at least \$35/month of Separate State Program (SSP)-funded assistance to count TANF beneficiaries in WPR calculations.

The recently-published Spring 2024 Unified Agenda estimates the publication of a notice of proposed rule making in **November 2024**.

<https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202404&RIN=0970-AD07>

# Pilot Program (Section 302)

Effective FY 2025

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July 2024 [Request for Proposals: TANF Pilot Updated Guidance and Application Submission Information](#) Proposals due September 3, 2024

July 2024 Letter from Principal Deputy Assistant Secretary for the Administration for Children and Families - [ACF Dear Colleague Letter](#)

May 2024 updates on the TANF FRA pilot opportunity - [OFA Dear Colleague Letter](#)

**Stay tuned for coming updates, including a pre-recorded webinar and Questions and Answers!**

# FRA Page on OFA's Website

## FISCAL RESPONSIBILITY ACT OF 2023

<https://www.acf.hhs.gov/ofa/law-regulation/tanf-provisions-fra-2023>

- Webinar summarizing the TANF provisions of the FRA: [OFA External Partner Call - June 8, 2023](#) (PDF)
- Text of the Legislation: [Fiscal Responsibility Act Of 2023](#) (PDF)
- Request for Information (RFI): [TANF Implementation of Sections 302 and 304 of the Fiscal Responsibility Act of 2023](#)
- November 2023 updates on future key milestones in FRA implementation - [OFA Dear Colleague Letter](#)

## TANF FRA Pilots

- July 2024 [Request for Proposals: TANF Pilot Updated Guidance and Application Submission Information](#) (PDF)
- July 2024 Letter from Principal Deputy Assistant Secretary for the Administration for Children and Families - [ACF Dear Colleague Letter](#)
- May 2024 updates on the TANF FRA pilot opportunity - [OFA Dear Colleague Letter](#)

## TANF Work Outcomes Measures

The TANF Work Outcomes Measures [interim final rule](#) includes three new reporting requirements:

- Work Outcomes of TANF Exiters Report
- Secondary School Diploma or its Recognized Equivalent Attainment Rate
- Supplemental Work Outcomes Report

OFA published a [Program Instruction](#) and [technical resource guide](#) (PDF) designed to support state and territory agencies in successfully understanding, preparing, and submitting the new reporting requirements.

On July 24, 2024 at 3pm ET, OFA will host a [webinar](#) to review the new measures and provide technical guidance for preparing and submitting the new reports for the measures.

OFA is hosting the report forms and instructions as DRAFTS on this page. In compliance with the requirements of Section 3506(c)(2)(A) of the Paperwork Reduction Act (PRA), ACF is soliciting public comments on these new collections, including but not limited to the quality, utility, and clarity of the information to be collected and the estimated time to complete. Please submit comments to [infocollection@acf.hhs.gov](mailto:infocollection@acf.hhs.gov) by August 27, 2024. Consideration will be given to comments and suggestions submitted within the timeframe specified.

[TANF Work Outcomes PRA Package](#) [zip file]

# Agenda

- Interim Final Rule
- Measures
- Definitions
- Reports
- Timelines

## TANF Work Outcomes Measures Technical Resource

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# TANF Work Outcomes Measures IFR

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- Interim Final Rule (IFR) was published on June 28, 2024
- The first two comment periods (60- and 30-day, sequential) meet the Paperwork Reduction Act (PRA) requirement and lead to OMB approval of the new report forms.
- The third (180-day, concurrent) applies to the whole of the IFR. We will modify the IFR and publish a Final Rule if warranted by public comments.

<https://www.federalregister.gov/documents/2024/06/28/2024-13865/temporary-assistance-for-needy-families-work-outcomes-measures>



# TANF Work Outcomes Measures

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- Employment Rate – 2<sup>nd</sup> Quarter After Exit
- Employment Retention Rate – 4<sup>th</sup> Quarter After Exit
- Median Earnings – 2<sup>nd</sup> Quarter After Exit
- Secondary School Diploma or its Recognized Equivalent (Secondary School Attainment)

# TANF Work Outcomes Definitions

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- **Exit** is the date that a family with a work-eligible individual ceases to receive assistance from the TANF program. The last day of assistance cannot be determined until 90 days have elapsed since the participant last received assistance.
- **Unsubsidized employment** is full- or part-time employment in the private or public sector after exiting the TANF program.
- A **Secondary school diploma** is a “regular high school diploma” as that term is defined in 21 U.S.C. 7801(43), the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA).
  - And a **recognized equivalent** is a certification recognized by a state that signifies that a student has completed the state’s requirements for a high school education.

# Work Outcomes Reports & Measures

	(FRA Section 304) Indicators of performance			
(Interim Final Rule) Reports	(A) Employment Rate - 2nd Quarter After Exit	(B) Employment Retention Rate - 4th Quarter After Exit	(C) Median Earnings - 2nd Quarter After Exit	(D) High school attainment or its equivalent
Work Outcomes of TANF Exiters (Quarterly)	Mandatory	Mandatory	Mandatory	
Secondary School Diploma or its Recognized Equivalent Attainment (Annual)				Mandatory
Supplemental Work Outcomes (Annual)	Optional	Optional	Optional	

# Fiscal Year 2025 Report Periods Due Dates

Work Outcomes of TANF Exiters (Quarterly)		
FY 2025 Quarter	Exiters during Quarterly Reporting Period	Due Date
FY Q1	October 1, 2024 - December 31, 2024	May 15
FY Q2	January 1, 2025 – March 31, 2025	August 14
FY Q3	April 1, 2025 – June 30, 2025	November 14
FY Q4	July 1, 2025 – September 30, 2025	February 14

Secondary School Attainment & Supplemental Work Outcomes (Annual)		
Fiscal Year	Annual Reporting Period	Due Date
FY 2025	October 1, 2024 – September 30, 2025	November 14, 2027
FY 2026	October 1, 2025 – September 30, 2026	November 14, 2028

# Work Outcomes of TANF Exiters Report

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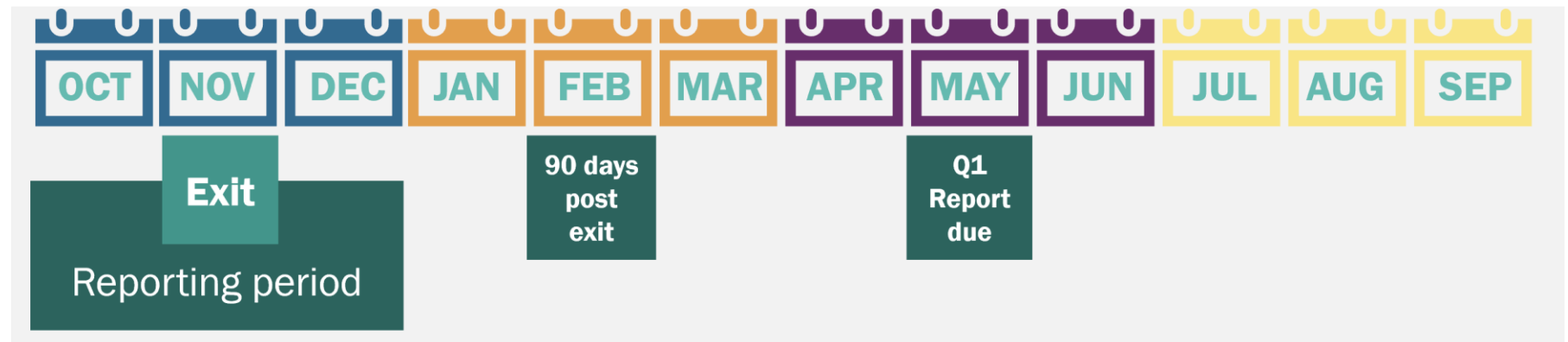
- Applies to the first three measures
- Quarterly report
- Mandatory
- Consists of the Social Security numbers (SSNs) of all work-eligible individuals who exit TANF in a given quarter
- We will match the SSNs with quarterly wage records in the National Directory of New Hires (NDNH) to obtain records from two quarters after the individual's exit through four quarters after the individual's exit and calculate the measures on behalf of states.

# Work Outcomes of TANF Exiters Report

## Quarterly Report Due Dates

Fiscal Year/Quarter	Quarterly Reporting Period	Due Date
FY Q1	October-December	May 15
FY Q2	January-March	August 14
FY Q3	April-June	November 14
FY Q4	July-September	February 14

### EXAMPLE:



# Supplemental Work Outcomes Report

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- States calculate the first three measures using ACF methodology but their data
- Annual report; will be on a lag
- Optional\*
- Universal-level data

\*Required for any states or territories who do not have an Unemployment Insurance Program and thus do not submit data to the NDNH. At this time, only Guam falls into this category.

# Supplemental Work Outcomes Report

## Annual Report Due Dates

Exit Quarter/Reporting Period	FY 2025, Q4 (time of exit) <i>July-September 2025</i>
2 <sup>nd</sup> Quarter After Exit	FY 2026, Q2
4 <sup>th</sup> Quarter After Exit	FY 2026, Q4
Employment & Earnings data available	FY 2027, Q3
Report Due following November	November 14, 2027

### EXAMPLE:

Annual Reporting Period	Due Date
FY 2025, October 1, 2024 – September 30, 2025	November 14, 2027
FY 2026, October 1, 2025 – September 30, 2026	November 14, 2028



# Secondary School Diploma or its Recognized Equivalent Attainment Rate

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- Annual report; will be on a significant lag due to when data is available
- Mandatory
- States calculate the rate using ACF methodology and their own data
- The rate measures whether TANF work-eligible individuals under age 24 who are enrolled in a secondary school program attain a degree or its equivalent while receiving TANF or within 1 year of exit.

## Secondary School Attainment Measure

# Eligibility

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An individual is **eligible** for the measure in a given federal fiscal year if, in at least one reporting month, they simultaneously meet all of the following criteria:

- ☑ Less than 24 years of age,
- ☑ Enrolled in a secondary school or recognized equivalent program,
- ☑ Work-eligible individual, as defined in 45 CFR Part 261.2(n)

## Secondary School Attainment Measure

# Calculation

Number of eligible individuals  
who are current recipients  
who did not exit, who  
attained diploma in reporting  
period



Number of eligible individuals  
who exited during reporting  
period, who attained diploma  
within 1 year of exit



Number of eligible  
individuals who are  
current recipients who did  
not exit



Number of eligible  
individuals who exited  
during reporting period

# Secondary School Diploma Attainment Rate Annual Report Due Dates

EXAMPLES:

Eligibility Period/Reporting Period	Attainment	Secondary School Attainment data available (estimate)	Report due following November
FY 2025	FY 2026	FY 2027	November 14, 2027
FY 2025	FY 2025	FY 2026	November 14, 2027

Annual Reporting Period	Due Date
FY 2025, October 1, 2024 – September 30, 2025	November 14, 2027
FY 2026, October 1, 2025 – September 30, 2026	November 14, 2028

## Secondary School Attainment Measure

# Scenarios

### Appendix A

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Five scenarios – each gives the eligibility characteristics on an individual and specifies if/when the individual attained their secondary school diploma.

#### Example:

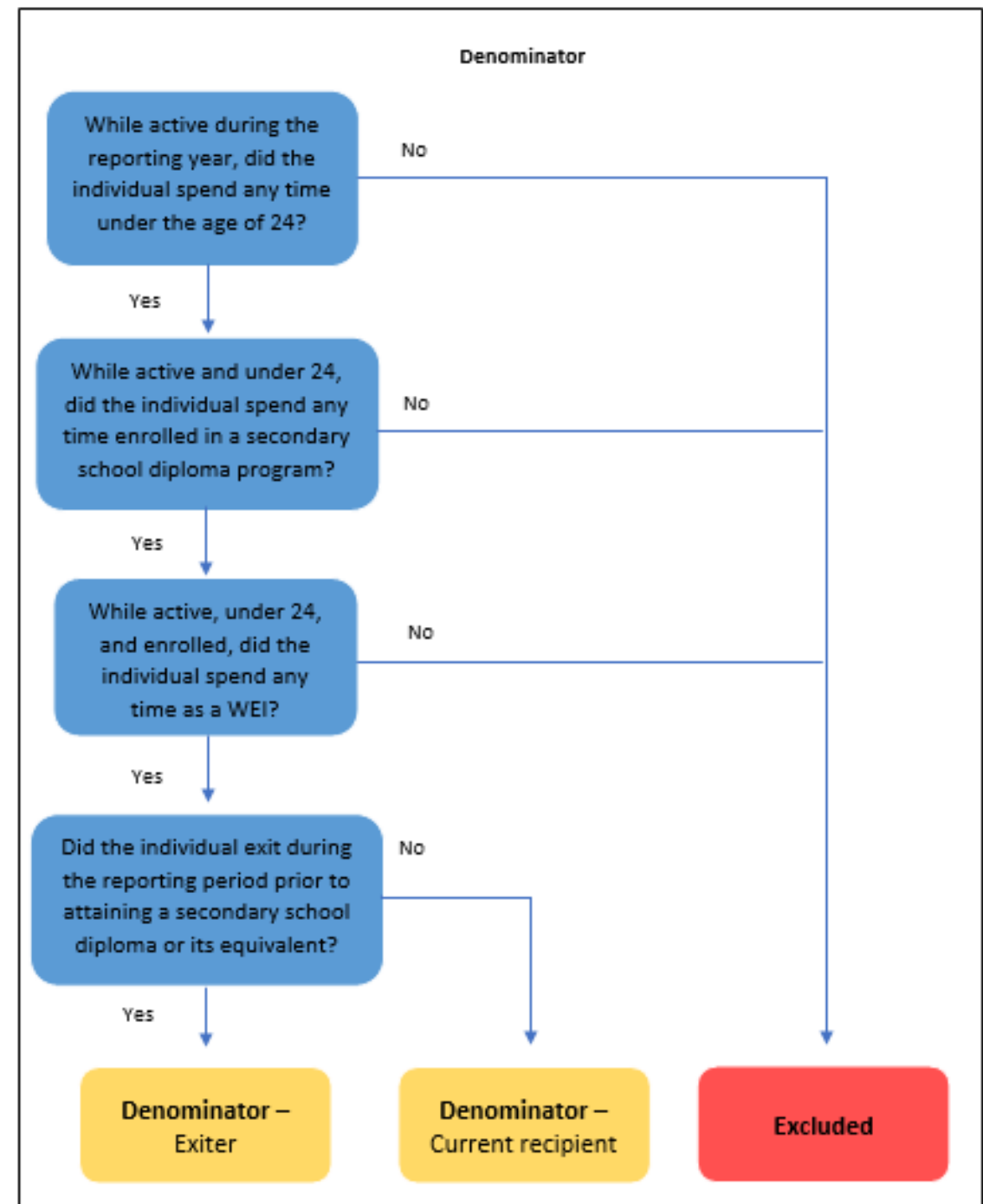
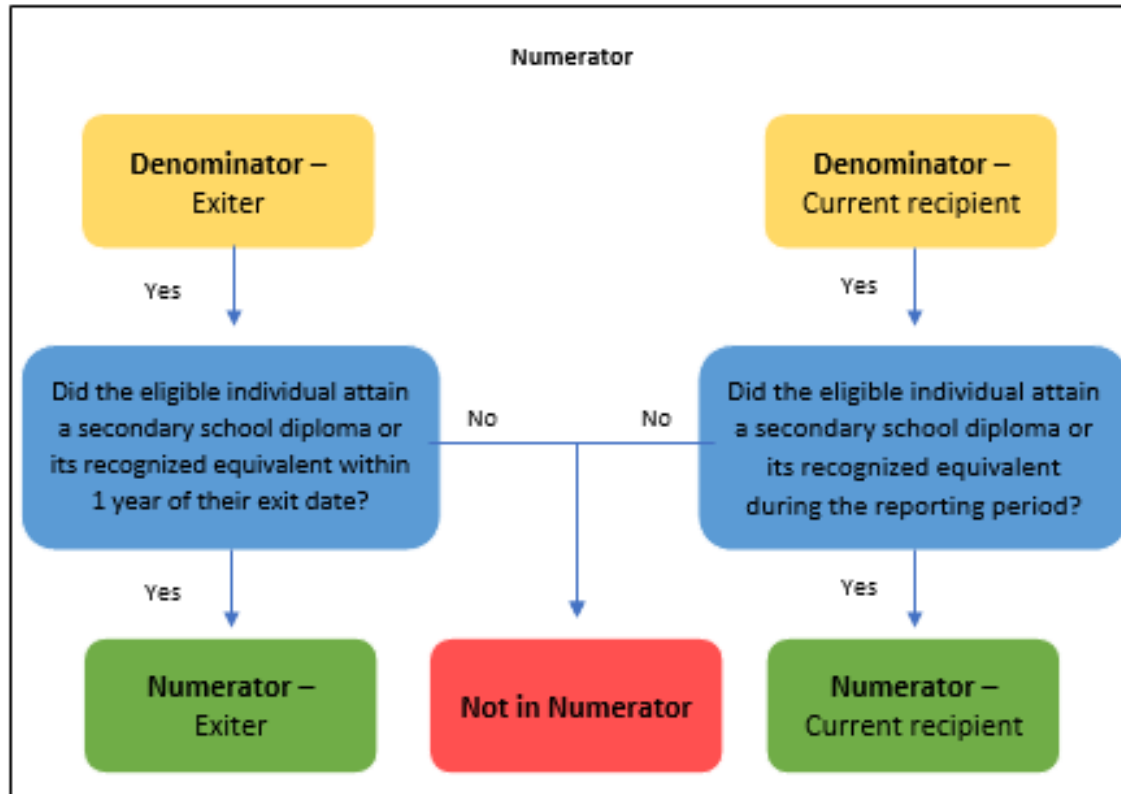
In FY 2025 individual turns 23, is enrolled in a secondary school program, and is simultaneously a work-eligible individual (WEI). Individual exits from TANF in June 2025. Individual attains a secondary school diploma in January 2026 (FY 2026).

Individual is in both the denominator and numerator for FY 2025 and is not represented in the FY 2026 measure. Individual attained a diploma in FY 2026 within 1 year of exiting TANF, and their last year of eligibility was FY 2025, so their attainment is counted towards FY 2025.

# Secondary School Attainment Measure

## Flowchart

Appendix B



# Report Forms

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The TANF Work Outcomes Measures [interim final rule](#) includes three new reporting requirements:

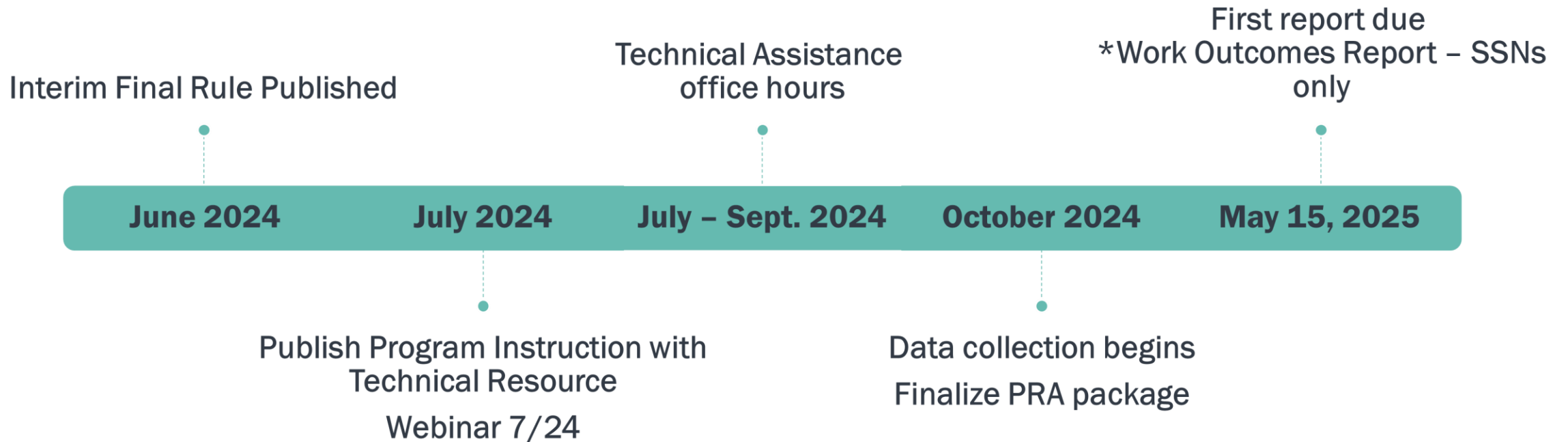
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Please submit comments to [infocollection@acf.hhs.gov](mailto:infocollection@acf.hhs.gov) by **August 27, 2024**. Consideration will be given to comments and suggestions submitted within the timeframe specified.

<https://www.acf.hhs.gov/ofa/law-regulation/tanf-provisions-fra-2023>

# Operational Timeline





# Thank you!

## Questions?

Comments on Interim Final Rule	<a href="mailto:TANFdata@acf.hhs.gov">TANFdata@acf.hhs.gov</a> by December 26, 2024
Comments on information collections	<a href="mailto:infocollection@acf.hhs.gov">infocollection@acf.hhs.gov</a> by August 27, 2024
Questions about work outcomes measures	OFA regional contact and/or <a href="mailto:TANFdata@acf.hhs.gov">TANFdata@acf.hhs.gov</a>