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**THE COMMUNITY WORK EXPERIENCE PROGRAM  
IN MINNESOTA:  
THIRD REPORT TO THE LEGISLATURE**

**Minnesota Department of Human Services  
Work and Training Unit  
February 15, 1987**

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Minnesota Department of Human Services  
Work and Training Unit  
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## EXECUTIVE SUMMARY

This report, the third in a series, analyses the Minnesota Community Work Experience Program (CWEP) in compliance with Minnesota Statutes section 256.737.

The Federal Omnibus Budget Reconciliation Act of 1981 (OBRA) permitted States to run CWEPs. The purpose of CWEP under Federal law is "to provide experience and training for (AFDC recipients) not otherwise able to obtain employment, in order to assist them to move into regular employment." /1 In CWEP, a State may require any group of AFDC recipients not meeting Federal exemption criteria to perform work serving a useful public purpose as a condition of AFDC eligibility. The monthly amount of work required may not exceed the AFDC grant divided by the minimum wage. The State may also allow voluntary participation by other AFDC recipients. The work performed must be in the public or private nonprofit sector and must not displace employees or fill established vacancies. Participants must be reimbursed for all participation expenses. Fifty-percent Federal reimbursement is available for all CWEP costs except (1) certain categories of participant reimbursement above specified limits, (2) direct supervision of participants in their work, and (3) materials and equipment for work done by participants.

Since spring, 1983, eight Minnesota Counties have operated CWEPs; seven of these counties still operate their programs. These counties are Blue Earth, Dodge, Itasca, Morrison, Otter Tail, Todd, and Winona. AFDC unemployed parents (UPs) not meeting certain exemption criteria are required to participate; voluntary participation is allowed for exempt UPs and, in some counties, AFDC recipients other than UPs. Counties pay the non-Federal share of county-level program costs. Under a 1985 amendment, the State CWEP statute allows eight additional counties to operate the program provided that no person be required to participate without first being given the opportunity to participate in (1) job placement services or (2) basic education or vocational training. To date, no additional counties have implemented CWEP.

Minnesota CWEP rules require that all participants be assisted in job search for at least three days before beginning a work assignment. The "assisted job search" component has included, in varying degrees in different counties, job-search skills training and actual job search. This component operated under CWEP until summer, 1986, and was transferred to the newly established AFDC Employment Search Program (ESP) at that time.

ESP, like CWEP, is authorized at the Federal level as a State option. In ESP, a State may require any group of AFDC recipients not meeting Federal exemption criteria to participate in job-search activities for up to eight weeks per year as a condition of AFDC eligibility, and may allow voluntary participation by other AFDC recipients. Participants must be reimbursed for all participation expenses. Fifty-percent Federal reimbursement is available for all ESP costs. In Minnesota, the mandatory and voluntary ESP participant groups are currently the same as in CWEP.

Over the period October, 1984 - September, 1986, 1,113 first-time participants began program orientation (where the overall program is explained), 750 began assisted job search, and 430 began work assignments. Itasca County accounted for 49% of those who began assisted job search and 64% of those who began work assignments. Participants were predominantly male, nonexempt UPs. Over the same period, the number of first-time UP participants who began orientation represented 69% of the number of UP case openings in the counties concerned; for assisted job search and work assignment, the corresponding percentages were 46% and 27%, respectively.

The most common types of agencies where CWEP participants worked were highway and street departments, schools, social service agencies, parks and recreation departments, and other natural resource agencies. The most common work participants performed was maintenance of streets, highways, buildings, and grounds. However, participants did several other types of work -- for example, as clerical workers, carpenters, and teachers' and nurses' aides.

Over the period October, 1984 - September, 1986, 115 sanctions occurred for nonexempt individuals because of noncompliance with program requirements. For UPs such as those concerned here, the sanction is a termination of the family's AFDC benefits for 3 months for the first occurrence and for 6 months for each additional occurrence. It is not known how often a sanction actually causes a reduction in AFDC receipt. For example, a sanction may occur where the individual obtains a job and merely stops communicating with the welfare agency (thus failing to "comply") knowing that the job will cause a termination of the family's AFDC benefits.

CWEP and ESP cost a total of \$387,457 over the period October, 1984 - September, 1986. (ESP operated for too short a time during the period to yield meaningful, separate cost data.) Of this amount, \$328,930 was in categories qualifying for 50% Federal reimbursement; as a result, \$164,465, or 42.4% of the total cost, was fully reimbursable while the remaining \$222,992 was nonreimbursable. Of the nonreimbursable amount, \$207,919 was at the county level while \$15,073 was at the State level.

During summer and fall, 1986, the Minnesota Department of Human Services conducted a written survey of CWEP participants who had been on work assignments at least two months and were still on work assignments; the results included the following (with 69% of all respondents from Itasca County): 76% of the respondents said they liked their CWEP work, while 17% said they disliked it; 52% said their CWEP work had helped prepare them to find regular employment, either through new skills or in other ways, while 38% said it had not; 14% said they had not been reimbursed for all expenses while 86% said they had; 57% said their CWEP work had increased their self-respect while 14% said it had decreased it; 69% said their CWEP work had been good for them on the whole, while 12% said it had been bad for them; finally, when asked whether they thought able-bodied welfare recipients should be required to work in return for their benefits, 68% said "yes" and 14% said "no."

In response to several questions on how assisted job search and work assignment had affected participants, program staff in all CWEP counties expressed a belief that assisted job search had helped many participants find employment or had helped prepare them to find employment. The program staff thought this was true not only because of improved job-search skills and assistance in actual job search, but also, for several participants, because of increased motivation and self-confidence and reduced fears of job search. These staff persons also expressed a uniform belief that the work assignment had helped prepare several participants to find employment, through such factors as an improved work history with references, greater self-confidence and motivation, improved work habits, increased resources and leads for finding employment, and, in some cases, new job skills. A majority of the program staff also indicated that some individuals had not been helped significantly by assisted job search or work assignment because of factors such as chemical abuse, physical or mental limitations, lack of motivation, or lack of suitable jobs in the locality.

One benefit of CWEP to the public is a wide variety of useful work performed by its participants. The value of this work for the period October, 1984 - September, 1986 was crudely estimated at approximately \$539,000, by multiplying the number of hours of work performed by an assumed value per hour of \$3.35 (the minimum wage). This estimate could be more or less than the actual value of the work (this value being what the public would be willing to pay for the work); however, the estimated value substantially exceeds the total program cost of \$387,457 for the same period.

Another possible benefit of the combined program of assisted job search and work assignment is a reduction of AFDC caseload and payments. DHS staff performed a statistical analysis to estimate whether such an effect had occurred, but the results were inconclusive. The reason was an inherent difficulty in controlling for factors other than the program that could affect the caseload. This problem suggests that reliable estimates of the effect of the program on caseload may never be obtained without an experimental design involving random assignment of individuals to treatment and control groups.

In summary, available information (from the participant questionnaire and program staff) suggests that both assisted job search (now under ESP) and work assignment (in CWEP) have helped prepare many, but not all, participants to find employment, thus reducing the AFDC caseload. Also, the data on sanctions for noncompliance suggest that these sanctions have reduced the caseload. However, there is no conclusive evidence to date from Minnesota that the combined program of assisted job search and work assignment with mandatory participation has in fact reduced the caseload.

The information in this report is broadly consistent with that presented in the previous report in this series. 12



## Chapter 1

### INTRODUCTION

#### I. NATURE AND PURPOSE OF REPORT

This report, the third in a series, analyzes the Community Work Experience Program (CWEP) in Minnesota, in compliance with Minnesota Statutes section 256.737 (Community Work Experience Program). This law, which appears in Appendix C, states, in part, that "a report shall be made to the legislature by February 15, 1987 on the feasibility of permanent implementation (of CWEP) and on the cost effectiveness of each of the (county CWEP) demonstration projects."

#### II. BACKGROUND

The Federal Omnibus Budget Reconciliation Act of 1981, Public Law 97-35 (OBRA), permitted States to operate Community Work Experience Programs. The stated purpose of these programs in Federal law is "to provide experience and training for (AFDC recipients) not otherwise able to obtain employment, in order to assist them to move into regular employment." <sup>/3</sup> In CWEP, a State may require AFDC recipients in a specified group to perform work that serves a useful public purpose as a condition of AFDC eligibility. The State specifies the group required to participate, but this group is limited by Federal exemption criteria essentially the same as in the Work Incentive Program (WIN). <sup>/4</sup> The work performed must be in public agencies or private nonprofit organizations, must not displace employees or fill established vacancies, and must comply with applicable health and safety standards. The State determines the monthly number of hours of work required of the mandatory group, not to exceed what results from dividing the monthly AFDC grant by the greater of the Federal or State minimum wage. The State may allow for voluntary participation by any group of AFDC recipients outside of the mandatory group. CWEP must be coordinated with other programs, including WIN and ESP (see below), to ensure that placement of participants into regular jobs has priority. The program may operate in whatever areas the State chooses. Most, but not all, CWEP expenses are eligible for 50% Federal reimbursement. These and other Federal CWEP provisions are in Code of Federal Regulations, Title 45, Part 238 (see Appendix A).

State authorization for CWEP is in Minn. Stat. section 256.737 (Appendix C). State CWEP rules are in Minnesota Rules, parts 9505.1050 to 9505.1065 (Emergency) (Appendix D).

Since spring, 1983, eight Minnesota counties have operated CWEPs; seven of these counties still operate their programs. These counties are Blue Earth, Dodge, Itasca, Morrison, Otter Tail, Todd, and Winona. Under Minnesota CWEP rules, the programs require participation by AFDC unemployed parents (UPs) not meeting certain exemption criteria, and allow for voluntary participation by exempt UPs. /5 The 1985 legislature amended the CWEP statute to allow up to eight additional counties to operate the program provided that no person be required to participate without first being given the opportunity to participate in (1) job placement services or (2) basic education or vocational training (Minn. Stat. sec. 256.737, subd. 2). To date, no additional counties have implemented CWEP.

From the inception of CWEP in Minnesota, an assisted-job-search component has preceded work assignment. Until summer, 1986, assisted job search was provided under CWEP; since that time, it has been provided under the AFDC Employment Search Program (ESP). ESP, like CWEP, is authorized at the Federal level as a State option. The stated purpose of ESP in Federal regulations is "to reduce welfare dependency by assisting individuals in obtaining regular unsubsidized employment." In ESP, a State may require nonexempt AFDC recipients to participate in job search and related activities for up to 8 weeks per year as a condition of AFDC eligibility. The State specifies the mandatory and voluntary participant groups, with the mandatory group limited to persons not meeting the WIN exemption criteria. ESP must be coordinated with other programs, including WIN and CWEP, to ensure that job placement has priority. Fifty-percent Federal matching is available for all ESP costs. These and other Federal ESP provisions are in Code of Federal Regulations, Title 45, Part 240 (see Appendix B).

Readers interested in additional historical information on CWEP in Minnesota should consult the two previous reports in this series. /6

### III. OVERVIEW

The remainder of this report describes CWEP in Minnesota in more detail and analyses its operation and effects. Chapter 2 describes program provisions and service delivery arrangements. Chapter 3 concerns program operation. It presents data on participants, CWEP work sponsors, positions in which CWEP participants have worked, AFDC case closures due to employment of participants, sanctions for noncompliance, and cost. Chapter 4 deals with how assisted job search and work assignment have affected participants. It presents results from a CWEP participant survey and views from program staff. Chapter 5 deals with benefits of ESP and CWEP to the public. It first describes some of the work performed by CWEP participants and presents a crude estimate of its value, and second, discusses how ESP and CWEP may affect the AFDC caseload (and thereby AFDC payments) and describes an effort that was made to estimate whether such an effect has actually occurred.

## Chapter 2

### PROGRAM PROVISIONS AND SERVICE DELIVERY

This chapter describes (1) the provisions of the AFDC Employment Search Program (ESP) and the Community Work Experience Program (CWEP) in Minnesota and (2) service delivery arrangements for the two programs. Section I describes participant groups. Sections II and III deal, respectively, with provisions of ESP and CWEP. Section IV describes other provisions relating to both programs. Section V describes service delivery arrangements. Readers desiring greater detail should consult Appendices A (Federal CWEP regulations), B (Federal ESP regulations), C (Minnesota CWEP statute), and D (Minnesota CWEP rules).

#### I. PARTICIPANT GROUPS

As indicated in the previous chapter, Federal regulations allow States to determine the mandatory and voluntary participant groups for ESP and CWEP, with the mandatory group for each program limited by Federal exemption criteria. The mandatory and voluntary groups may be different for ESP and CWEP, but in Minnesota they are the same for the two programs.

Under the Minnesota CWEP rules, the mandatory group consists of AFDC UPs who do not meet one or more exemption criteria. These criteria consist of the Federally mandated CWEP exemption criteria with additional exemption criteria set forth by DHS. 17

DHS requires the counties to allow for voluntary participation by exempt UPs. Counties have the option to allow AFDC recipients other than UPs to participate. The counties exercising this option are Blue Earth, Dodge, Morrison, Todd, and Winona, although Winona County does not systematically inform non-UPs about the program.

#### II. EMPLOYMENT SEARCH PROGRAM

The Minnesota CWEP rules require that all CWEP participants be assisted in job search for at least three days before beginning a work assignment.

Until summer, 1986, job-search assistance and related activities for CWEP participants were provided under CWEP. In summer, 1986, after approval from the Federal Office of Family Assistance, Minnesota instituted an AFDC Employment Search Program (ESP) to provide job-search assistance and

related activities for CWEP participants, and transferred these activities to ESP.

Under Federal regulations, ESP activities may include actual job search, job-search skills training, job clubs, job development, exposure to labor market information, work orientation, and referral, to the extent that these are necessary to assist participants in finding employment. Recipients may not be required to participate in ESP for more than eight weeks or the equivalent per year.

In order to maximize use of WIN resources, DHS requires that individuals in WIN counties complete a WIN employability development plan (EDP) and search for employment for two weeks in WIN before beginning ESP. In order to avoid duplication, ESP activities in WIN counties must take account of the WIN EDP and WIN activities. (All CWEP counties except Otter Tail are WIN counties.)

The county must ensure that no individual incurs any cost from participating in ESP. To meet this requirement, the county may either ensure that those support services and other items necessary for participation (including transportation and child care) are furnished to the participant, or compensate the participant, through advance or reimbursement, for any expenses he or she reasonably incurs for these items.

Fifty-percent Federal reimbursement is available for all reasonable costs of operating ESP, including provision of support services and participant reimbursement. The counties pay the non-Federal portion of county-level ESP costs.

In the county programs, job-search skills training covers such topics as discovering job openings, filling out applications, putting together a resume, writing letters, making contact by telephone, and interviewing. Some of the programs use mock telephone calls and interviews. Some programs include testing for skills and interests to help the individual establish employment goals.

In most of the programs, job-search skills training is carried out in groups, which allows sharing of experiences and peer support in addition to being more efficient than individual instruction. Otter Tail County, however, uses a one-on-one approach; according to program staff in that county, this approach has the advantage of being less threatening to the participant in addition to allowing greater individual attention.

During the job-search period, which follows job-search skills training, participants contact employers, keep records of the contacts, and discuss the contacts with program staff. Nonexempt participants are generally assigned a minimum number of contacts to make per week, typically in the range of three to six.

**All of these job-search activities, previously under CWEP and now under ESP, are referred to throughout this report as the "assisted job search" component.**

Over the last two years, the period of assisted job search has been one to six weeks, depending on the county concerned. However, the placement of participants on work assignments (see next section) has generally occurred from two weeks to two months after the start of assisted job search, depending on both the county and the individual case.

### III. COMMUNITY WORK EXPERIENCE PROGRAM

In CWEP, participants are placed on work assignments. The purpose of the CWEP work assignment, as stated in State statute, is to assist AFDC recipients "in achieving self-sufficiency by enhancing their employability through meaningful work experience and training." /8

CWEP work sponsors -- agencies and organizations where CWEP participants are assigned to work -- must be in the public or private nonprofit sector, and the work participants perform must serve a useful public purpose. CWEP placements must not displace regular employees or fill established vacancies, and must not have been developed in response to, or be associated with, a labor dispute. Where regular employees of the work sponsor are covered by a collective bargaining agreement, the union must be notified in advance of a placement and must concur before the placement is made. The work must conform to applicable Federal, State, and local health and safety standards, and the participant must be covered by Workers' Compensation while doing his or her assigned work.

The number of hours of work per month required of mandatory participants must not exceed the monthly AFDC grant divided by the greater of the Federal or State minimum wage (currently \$3.35). Under DHS rules, participants must be allowed one business day off per week to be able to search for regular employment. In addition, they may not be required to work for more than 6 months in any period of 12 consecutive months, although they may volunteer to do so.

Within these constraints, counties choose the method of determining the monthly amount of work required of mandatory participants. This method generally consists of dividing the monthly AFDC grant by some "wage." Otter Tail and Winona Counties use the minimum wage; Dodge, Morrison, and Todd Counties use the prevailing wage for the type of work performed; Itasca County uses a flat rate of \$8.60 per hour, rounding the resulting number of hours to the nearest 8-hour day; Blue Earth County uses the minimum wage at the start of the placement, but after 3 months raises the "wage" to \$4.00 per hour if the individual has performed satisfactorily.

As in ESP, the county must ensure that no individual incurs any costs to participate in CWEP. The county may meet this requirement by ensuring that necessary support services and other items (including transportation, child care, and special work clothing and gear) are furnished to the participant or by compensating the participant for expenses reasonably incurred for these services and items.

Fifty-percent Federal reimbursement is available for all reasonable costs of operating CWEP, with the following exceptions: First, Federal matching is not available for CWEP participant reimbursement for (1) child care costs over \$160 per month per child or (2) costs of items other than transportation and child care over \$10 per month per participant. (Federal matching is available without limit for reimbursement of participant transportation expenses.) Second, Federal reimbursement is not available for costs of supervising participants on work assignments or for costs of materials and equipment used in work done by participants. Counties pay the non-Federal portion of county-level CWEP costs.

#### **IV. OTHER PROVISIONS**

##### **A. Sanctions**

If a nonexempt individual fails to comply with ESP or CWEP requirements without good cause, a sanction is applied. Since all nonexempt individuals in ESP and CWEP are UPs, a sanction in either program is the cutting off of AFDC benefits for the entire assistance unit for three months for the first occurrence and for six months for each additional occurrence. Good cause exists, for example, when (a) the individual meets one of the exemption criteria, (b) the individual is not fully compensated for all necessary participation expenses, (c) the individual does not have the necessary skills or abilities for the activity, or (d) in CWEP, the assigned work adversely affects the individual's health.

##### **B. Oversight Committee**

Each ESP-CWEP county is required to have an Oversight Committee. Attempt must be made to include, as Committee members, representatives of several interest groups, including AFDC-UP recipients, public employee union members, legal services workers, and business persons, and Committee members must be approved by the Commissioner of Human Services. The Oversight Committee has the responsibility to (1) hold nonbinding hearings to try to resolve participant grievances before resort is made to welfare hearing procedures, (2) provide a forum for participants and other interested parties to voice concerns, (3) visit CWEP work sites to inquire about any complaints about CWEP work assignments, and (4) review evaluations of the program by DHS and make recommendations to the Commissioner. Participants must be informed of the Oversight Committee and its functions, and must be given a list of the names, addresses, and telephone numbers of all Committee members.

## V. SERVICE DELIVERY

The counties use a variety of arrangements for ESP and CWEP service delivery.

In Blue Earth and Otter Tail Counties, county human service staff run the programs directly.

In the other counties, the programs are run by outside service providers under contract. Dodge County contracts with the Southeast Minnesota Private Industry Council, a Job Training Partnership Act (JTPA) service provider. Itasca County contracts with the Arrowhead Economic Opportunity Agency, also a JTPA provider. Morrison, Todd, and Winona Counties contract with Job Service.



## Chapter 3

### PROGRAM OPERATION

This chapter deals with the operation of CWEP and ESP over the period October, 1984 - September, 1986. Section I presents participation data. Section II describes the process of placing participants on work assignments. Sections III and IV present data on types of CWEP work sponsors and types of positions in which CWEP participants worked. Sections V-VII give data on AFDC case closings due to employment of participants, sanctions for noncompliance with CWEP and ESP, and program cost.

The data relate to three program components: orientation, assisted job search, and work assignment. Orientation, which occurs first, is where individuals are told about the program and its requirements. As described in the previous chapter, assisted job search precedes work assignment.

#### I. PARTICIPATION

Table 1 shows the numbers of first-time participants who began orientation, assisted job search, and work assignment, in all CWEP counties combined, by quarter over the period October, 1984 - September, 1986. The totals (right column) show that 1,113 first-time participants began orientation, 750 began assisted job search, and 430 began work assignments over the period. In comparison, during the period April, 1983 - September, 1984, 827 first-time participants began orientation, 492 began job search, and 406 began work assignments. 19

There are several reasons why the number of participants declines between orientation and assisted job search and between assisted job search and work assignment. First, some individuals leave AFDC between one program component and the next (see sections V and VI). Second, an originally nonexempt person may become exempt after orientation or assisted job search (for example, because of starting a vocational education program). Third, an exempt person voluntarily completing orientation or assisted job search may decide not to participate further. Finally, in Otter Tail County (as explained below), some individuals have not been placed on work assignments because of limited numbers of available positions during summer months.

Table 2 shows participation by county from October, 1984 through September, 1986. By far, Itasca County had the largest number of participants, accounting for 364 (49%) of the 750 individuals who began assisted job search and 274 (64%) of the 430 individuals who began their first work assignment over the period. The relatively small numbers for

Table 1

Total Number of First-Time Participants Who Began  
Orientation, Assisted Job Search, and Work Assignment  
in All CWEP Counties by Quarter,  
October, 1984 - September, 1986

	10/84- 12/84	1/85- 3/85	4/85- 6/85	7/85- 9/85	10/85- 12/85	1/86- 3/86	4/86- 6/86	7/86- 9/86	TOTAL
Orientation	124	149	120	134	129	160	173	124	1,113
Assisted Job Search	94	104	88	106	112	95	111	40	750
Work Assignment	41	81	49	50	82	41	64	22	430

Table 2

Number of First-Time Participants Who Began Orientation,  
Assisted Job Search, and Work Assignment by County,  
October, 1984 - September, 1986

County	Orientation	Assisted Job Search	Work Assignment
Blue Earth	9	9	10
Dodge	42	22	6
Itasca	533	364	274
Morrison	162	118	38
Otter Tail	150	105	21
Todd	127	104	38
Winona	90	28	43
TOTAL	1,113	750	430

Blue Earth and Dodge Counties reflect that the programs in these counties either were not operating or were operating at reduced levels over much of the period, because of staff turnover and, in Blue Earth County, administrative reorganization. The numbers for Dodge County also reflect relatively small numbers of AFDC recipients in that county (see Tables 4 and 5 below). In Otter Tail County, the relatively small number of persons placed on work assignments, as compared with the number participating in assisted job search, reflects in part a loss of available positions for CWEP participants during summer months because of summer youth programs, and in part insufficient staff time for developing alternative positions during those months. In Winona County, the number participating in assisted job search was less than the number placed on work assignments because, in connection with the transfer of assisted job search from CWEP to ESP, this component was voluntary for all participants from May through August, 1986, and several otherwise-nonexempt individuals in Winona County during that period opted to forgo assisted job search and go directly to work assignments after orientation. /10

Table 3 gives a breakdown, by UP-vs.-non-UP status, exemption status, and sex, of first-time participants from October, 1984 through September, 1986. As expected, nonexempt UPs accounted for the bulk of all participants. About 94% of first-time participants in assisted job search and 96% of those who began their first work assignments over the period were nonexempt UPs; the remainder were exempt UPs and non-UPs. Correspondingly, most participants were male; only 13.3% of those beginning assisted job search, and 6.0% of those starting their first work assignments, were female.

Since participation is mandatory for nonexempt UPs, one question of interest is what proportion of UPs participate in each program component. Table 4 shows the number of UPs (exempt and nonexempt) participating for the first time in each component in comparison with the number of UP case openings for each county over the period October, 1984 - September, 1986. Note, first, that Itasca County leads the seven counties by far in UP case openings, with 572 over the period. This is a large part of the reason that Itasca County leads the others in CWEP and ESP participation.

As shown in Table 4, the total number of UPs participating for the first time in orientation was 68.6% of the number of UP case openings over the period. For assisted job search and work assignment, the corresponding percentages were 46.2% and 26.8%.

Excluding Blue Earth and Dodge Counties, where the program did not operate or operated on a reduced scale over much of the period (as described above), the number of first-time UP participants in orientation as a proportion of UP case openings ranged from 59.2% for Winona County to 93.2% for Itasca County. Among the same counties (other than Blue Earth and Dodge), the percentage participating in assisted job search fell within the fairly narrow range of 56.5% to 63.6%, with the exception of 18.4% for Winona County. (At least a partial reason for the lower figure for Winona County is indicated above.)

Table 3

First-Time Participants Who Began Orientation, Assisted Job Search,  
and Work Assignment: Number and Percentage By UP-vs.-non-UP Status,  
Exemption Status, and Sex,  
October, 1984 - September, 1986

	Orientation		Assisted Job Search		Work Assignment	
Nonexempt UPs	1,030	92.5%	707	94.3%	412	95.8%
Male	945	84.9	633	84.4	397	92.3
Female	85	7.6	74	9.9	15	3.5
Exempt UPs	46	4.1	18	2.4	8	1.9
Male	37	3.3	14	1.9	5	1.2
Female	9	0.8	4	0.5	3	0.7
Non-UPs (Exempt)	37	3.3	25	3.3	10	2.3
Male	5	0.4	3	0.4	2	0.5
Female	32	2.9	22	2.9	8	1.9
Total Male	987	88.7	650	86.7	404	94.0
Total Female	126	11.3	100	13.3	26	6.0
TOTAL	1,113	100.0%	750	100.0%	430	100.0%

Table 4

Number of UPs Participating for First Time in Orientation,  
Assisted Job Search, and Work Assignment Compared With  
Number of UP Case Openings by County,  
October, 1984 - September, 1986

County	Number of UP Case Openings	UPs Participating for First Time in --					
		Orientation		Assisted Job Search		Work Assignment	
		Number	Percen- tage of UP Case Openings	Number	Percen- tage of UP Case Openings	Number	Percen- tage of UP Case Openings
Blue Earth	240	7	2.9%	7	2.9%	8	3.3%
Dodge	71	26	36.6	14	19.7	5	7.0
Itasca	572	533	93.2	364	63.6	274	47.9
Morrison	180	156	86.7	111	61.7	36	20.0
Otter Tail	184	150	81.5	105	57.1	21	11.4
Todd	170	114	67.1	96	56.5	34	20.0
Winona	152	90	59.2	28	18.4	42	27.6
TOTAL	1,569	1,076	68.6%	725	46.2%	420	26.8%

Where work assignment is concerned, however, the situation is different. The number of first-time UP participants who began work assignments, as a percentage of UP case openings over the period, was highest for Itasca County at 47.9%. Winona County was a distant second at 27.6%, followed by Morrison and Todd Counties at 20% each. Thus, where work assignment is concerned, the relatively high number of participants in Itasca County is attributable not only to a relatively high number of UPs, but also to a relatively high proportion of UPs participating.

Table 5 shows the average monthly number of participants on work assignments, the average monthly number of UPs on work assignments, and, for comparison, the average monthly UP caseload, by county for the period October, 1984 - September, 1986. For the seven CWEP counties combined, an average of 152.3 individuals were on work assignments per month over the period, of which 150.5 were UPs. This latter number made up 23.0% of the average monthly UP caseload of 653. Again, Itasca County emerges as the leader in the rate of work-assignment participation, with an average of 46.3% of its UPs on work assignments during a month. For Morrison, Otter Tail, Todd, and Winona Counties (those other than Itasca without substantial periods of reduced program activity), the average monthly number of UPs on work assignments ranged from 8.4% to 10.9% of the average monthly UP caseload.

## II. PROCESS OF PLACING CWEP PARTICIPANTS ON WORK ASSIGNMENTS

As stated in State statute, the purpose of the CWEP work assignment is to assist AFDC recipients "in achieving self-sufficiency by enhancing their employability through meaningful work experience and training." /11

CWEP staff in the counties were asked to indicate the factors considered in selecting work sponsors and positions for CWEP participants. (A CWEP work sponsor is an agency or organization where a CWEP participant carries out his or her work assignment.) The factors indicated included the following: the participant's interests and preferences, proximity of the work site to the individual's home, participant's ability to do the work involved, training and experience provided by the position and the value of these to the individual, opportunity to use current skills in the position, needs of the sponsor, value of individual's current skills to the sponsor, and the degree of supervision. The relative weight placed on each factor seems to vary across counties.

In most cases, the sponsor first interviews the participant and decides whether to accept the person for a work placement.

Table 5

Average Monthly Number of Participants on Work Assignments,  
 Average Monthly Number of UPs on Work Assignments,  
 and Average Monthly UP Caseload by County,  
 October, 1984 - September, 1986

County	Average Monthly Number of Persons on Work Assignments		Average Monthly UP Caseload (3)	Average Monthly Number of UPs on Work Assignments as Percentage of Average Monthly UP Caseload ((2)/(3)) (4)
	All Participants (1)	UPs (2)		
Blue Earth	6.8	5.9	121	4.9%
Dodge	0.3	0.2	18	1.1
Itasca	118.9	118.9	257	46.3
Morrison <u>/a</u>	8.0	7.8	72	10.8
Otter Tail	4.6	4.6	55	8.4
Todd <u>/a</u>	7.4	6.9	73	9.5
Winona	6.3	6.2	57	10.9
TOTAL	152.3	150.5	653	23.0%

a. The averages for Morrison and Todd counties exclude October and November, 1984 because these counties' current programs began in fall, 1984, and in both counties participants were first placed on work assignments in December, 1984.

### III. TYPES OF CWEP WORK SPONSORS

Table 6 shows types of CWEP work sponsors by sector (public vs. private nonprofit) and their frequency of use, on an annual-average basis, during the period October, 1984 - September, 1986. The most commonly used types of sponsors were highway and street departments, elementary and secondary schools, social service agencies, parks and recreation departments, and other natural resource agencies. However, a variety of other types of sponsors were used, such as an agricultural experiment station, home for mentally retarded adults, county historical society, water treatment plant, and food bank. Of the annual average of 136 sponsors of all types used, 78 were within local government (county, city, town (or township), or village), 26 were in independent school districts, 16 were private-nonprofit organizations, and 16 were State or Federal agencies.

### IV. TYPES OF CWEP POSITIONS

Table 7 shows the types of positions in which CWEP participants worked, and their annual-average frequency of use, for October, 1984 - September, 1986. Often, especially in Itasca County, a work assignment involves more than one type of work. In such a case, the position is classified according to the type of work most often performed.

The largest numbers of positions, and the positions to which participants were most often assigned, were in the categories of highway or street maintenance worker, building custodian, building maintenance worker other than custodian, grounds maintenance worker, roving maintenance crew worker, and roadside maintenance worker. However, as with work sponsors, a variety of positions were used. CWEP participants also worked, for example, in the positions of clerical worker, aide with mentally handicapped, accounting assistant, horticultural assistant, environmental technician trainee, food bank assistant, library aide, health aide, and silk screen printer.

### V. AFDC CASE CLOSINGS DUE TO EMPLOYMENT OF CURRENT AND FORMER PARTICIPANTS

As shown in Table 8, 784 AFDC case closings occurred from October, 1984 through September, 1986 for individuals who had participated in assisted job search or work assignment at any time since their last AFDC case openings. This number, as one would expect, is of the same order as the 750 individuals who began assisted job search over the same period (Table 1). Of the 784 case closings, 384, or 49.0%, were reported as being due

Table 6

Types of CWEP Work Sponsors Used, Average Number of Sponsors of Each Type Used Per Year, and Average Number of Participants Working With Sponsors of Each Type Per Year, All CWEP Counties, October, 1984 - September, 1986 /a

Type of Sponsor	Average Number of Sponsors of Given Type Used Per Year /a							Average Number of Participants Working With Sponsors of Given Type Per Year /a
	Public Sector							
	Total	City, Town, or Village	County	State	Federal	Independent School District	Private Non-profit Sector	
Highway or street department excluding maintenance shops	21	15	5	1				107
Maintenance shop within highway or street department	35	22	13					59
Elementary or secondary school	27					26	1	48
Social service agency	8		5		1		2	67
Natural resource agency other than department of parks and/or recreation	8			3	5			26
Department of parks and/or recreation	8	3	1	3			1	19
Nursing home	6		3				3	9
Hospital	4	1	2				1	18
Other /b	19	3	5	2	1		8	41
TOTAL	136	44	34	9	7	26	16	/c

a. The averages are over two years, October, 1984 - September, 1985 and October, 1985 - September, 1986, and are rounded as necessary.

Table 6 (continued)

- b. Agriculture experiment station, golf course, fair grounds, low-income housing complex, recycling center, military camp, developmental achievement center, home for mentally retarded adults, National Guard armory, women's resource center, art center, county historical society, accounting office, YMCA, YWCA, water treatment plant, veterans' service agency, food bank, college, community action agency, city government (no particular agency), health department, senior citizens' home, data processing office.
- c. Does not apply because individuals may have worked with more than one type of sponsor.

Table 7

Types of CWEP Positions Used, Average Number of Positions of Each Type Used Per Year, and Average Number of Participants Working In Positions of Each Type Per Year, All CWEP Counties, October, 1984 - September, 1986 /a

Type of Position	Average Number of Positions of Given Type Used Per Year /a	Average Number of Participants Working in Positions of Given Type Per Year /a
Highway or street maintenance worker	69	149
Building custodian	32	59
Building maintenance worker other than custodian	24	34
Grounds maintenance worker	23	39
Roving maintenance crew worker	15	30
Roadside maintenance worker	15	30
Clerical worker	11	14
Natural resource worker	7	7
Carpenter	3	7
Aide with mentally handicapped	3	4
Mechanic	3	3
Other /b	18	23
TOTAL	223	/c

a. The averages are over two years, October, 1984 - September, 1985 and October, 1985 - September, 1986, and are rounded as necessary.

b. Artist, accounting assistant, CWEP coordination assistant, teacher's aide, horticultural assistant, retail sales worker (historical society bookstore), environmental technician trainee, sewer, child care worker, chemist, welfare case aide, recreation aide, food bank assistant, electrician, cook, graphic artist and printer, library aide, tree trimmer, administrative assistant, health aide, kitchen helper, house keeper, data entry worker, silk screen printer, equipment operator, nurse's aide, recycling machine operator.

Table 7 (continued)

- c. Does not apply because an individual may have worked in more than one type of position.

Table 8

Total AFDC Case Closings for Current and Former Program Participants, and Those Closings Reported as Being Due to Employment of Participant, All CWEP Counties, October, 1984 - September, 1986

	Number	Percentage
AFDC Case Closings for Current and Former Program Participants <u>/a</u>	784	
Closings Reported as Due to Employment of Current or Former Participant <u>/b</u>	384	49.0% <u>/c</u>
Amount of Time From First Program Activity (Beyond Orientation) to Case Closing, for Closings Reported as Due to Employment of Current or Former Participant:		
0 - 3.0 months	178	46.4 <u>/d</u>
3.1 - 6.0 months	97	25.3
6.1 - 12.0 months	64	16.7
12.1 - 24.0 months	26	6.8
24.1 - 36.0 months	16	4.2
36.1+ months	3	0.8

- a. Consists of AFDC case closings for persons who had participated in assisted job search or work assignment at any time since their last AFDC case openings.
- b. Excludes cases where the individual obtained the job before participating in the program, including cases where the person was recalled, after a lay-off, to a job he or she first obtained before starting the program.
- c. Relative to the 784 case closings.
- d. Relative to the 384 closings due to employment of current or former participant.

to employment of the current or former participant. (This is probably an understatement of the true percentage, however, because some closings due to employment are probably not reported as such by the individual.)

Table 8 also indicates that of those closings reported as being due to employment of the current or former participant, 46.4% occurred within 3 months of the first program activity beyond orientation, 71.7% occurred within 6 months, and 88.4% within one year. A cautionary note is in order, however. Depending on the county, the programs had operated for only 2 to 3-1/2 years before the end of the report period. Consequently, those staying on AFDC for relatively long periods after starting in the program are represented among the case closings in proportionately smaller numbers, relative to their actual numbers, than is true for shorter-term recipients, because the longer-term recipients were more likely to have still been on AFDC at the end of the report period. /1?

It should also be emphasized that this information, in and of itself, says nothing about the effect of the program in helping participants find employment or in bringing about AFDC case closings. The data are merely intended to describe what happens to people who have participated in the program. Any statements about program effects based on data such as these must be derived from comparative analysis (e.g. participants vs. nonparticipants or CWEP counties vs. non-CWEP counties). Such an analysis was performed by DHS staff and is described in Chapter 5.

## VI. SANCTIONS

As shown in Table 9, 115 sanctions for noncompliance with CWEP and ESP occurred from October, 1984 through September, 1986 in all seven counties, with 74 of these occurring in Itasca County.

This information suggests that the sanction provisions (Chapter 2, sec. IV) have reduced the length of stay on AFDC for some individuals. However, a sanction may occur in a situation where, for example, an individual finds a job independently of the program or moves from the county, and consequently ceases participating (or never starts) and stops communicating with the welfare office (and/or service provider), knowing that the family's AFDC benefits will be terminated anyway because of the job or the move. In this case, the sanction is merely a reflection of other conditions, and does not itself reduce the length of stay on AFDC. This is in contrast to the situation where the sanction is actually the cause for the family to leave AFDC. How often each type of situation occurs relative to the other is unknown.

Table 9

Number of Sanctions for Noncompliance  
with CWEP and ESP by County,  
October, 1984 - September, 1986

---

Blue Earth	2
Dodge	4
Itasca	74
Morrison	13
Otter Tail	2
Todd	12
Winona	8
TOTAL	115

---

## VII. COST

CWEP and ESP costs are reported here in combination rather than separately, because with Federal approval of ESP in summer, 1986, that program did not operate long enough during the report period to yield meaningful, separate cost data.

Table 10 shows combined CWEP and ESP cost by category, at the county and State levels, over the period October, 1984 - September, 1986. It also shows (1) the percentage of cost in each category that was reimbursable by the Federal government (see Chapter 2, secs. II,III) and (2) the amounts reimbursable and nonreimbursable in each category based on the percentage reimbursable.

The data in Table 10 indicate that the total cost of operating CWEP and ESP over the two-year period was \$387,457. Of this amount, \$357,311, or 92.2%, was at the county level and the remaining \$30,146, or 7.8%, was at the State level. The largest category of expenditure at the county level was for contracts with outside service providers (43% of county total), followed by employee compensation (28% of county total) and participant reimbursement (21% of county total). The payments to outside service providers were primarily for employee compensation and overhead costs incurred by the providers.

As shown by the figures in the second column, all but two categories of cost were 50% reimbursable by the Federal government. The two exceptions are employee compensation for CWEP participant supervision (direct supervision of participants on work assignments) and materials and equipment for CWEP work projects; no Federal reimbursement is available for these costs. Fifty-percent Federal reimbursement for costs of assisted job search was made under CWEP until the end of March, 1986, and has been made under ESP since that time. /13

It should be noted that the costs shown do not cover all services provided under CWEP and ESP. In Itasca County, for a majority of the period, the Arrowhead Economic Opportunity Agency (the service provider for JTPA, MEED, and Work Readiness in northeastern Minnesota) provided job-search skills workshops for participants at no charge to the county. In Winona County, participant reimbursement was often paid by WIN.

Of the total county-level cost of \$357,311, \$298,784 was in categories eligible for 50% Federal reimbursement. Thus, \$149,392 of the total county-level cost (41.8%) was fully reimbursable; the remainder, \$207,919, was nonreimbursable, representing the cost to the counties. At the State level, the total cost of \$30,146 was 50% reimbursable, leaving a nonreimbursable portion of \$15,073. Of the overall cost of \$387,457, \$164,465 (42.4%) was fully reimbursable; the remainder, \$222,992, was nonreimbursable.

In comparison, for the period April, 1983 - September, 1984, the total county-level cost of CWEP was \$253,848, of which \$111,140 (44%) was fully reimbursable and the remaining \$142,708 was nonreimbursable. /14

Table 10

Combined CWEP and ESP Cost, Percentage Reimbursable,  
and Amounts Reimbursable and Nonreimbursable /a by  
Category of Cost at County and State Levels,  
October, 1984 - September, 1986

Category	Total Amount	Percentage Reimbursable /a	Amount Reimbursable /a	Amount Nonreimbursable /a
COUNTY LEVEL	\$357,311	41.8% /i	\$149,392	\$207,919
Employee Compensation: /b	98,410	29.5 /i	29,035	69,375
Other Than For CWEP Participant Supervision /c	58,069	50.0	29,035	29,034
For CWEP Participant Supervision /c	40,341	0.0	0	40,341
Contracts With Outside Service Providers	152,654	50.0	76,327	76,327
Employee Travel	2,179	50.0	1,089	1,090
Participant Reimbursement /d	73,439	50.0	36,720	36,719
Materials and Equipment For CWEP Work Projects /e	18,186	0.0	0	18,186
Overhead /f	10,825	50.0	5,412	5,413
Other /g	1,618	50.0	809	809
STATE LEVEL	30,146	50.0 /i	15,073	15,073
Employee Compensation /b	24,710	50.0	12,355	12,355
Overhead /h	5,436	50.0	2,718	2,718
TOTAL	\$387,457	42.4% /i	\$164,465	\$222,992

a. The percentages and amounts reimbursable are reimbursable by the Federal government under the AFDC administrative-match formula.

Table 10 (continued)

- b. Computed by multiplying total compensation for each employee concerned by the proportion of the employee's time devoted to CWEP and ESP and adding the results for all employees.
- c. CWEP participant supervision means direct supervision of CWEP participants on work assignments.
- d. Primarily for transportation expenses.
- e. The portion of the figure in this category that is related to equipment represents depreciation rather than purchase costs.
- f. On the basis of DHS data, imputed as 11% of county employee compensation.
- g. The only item in this category is workbooks for job-search skills training.
- h. On the basis of DHS data, imputed as 22% of State employee compensation.
- i. Determined as the ratio of the amount reimbursable to the respective total.

Table 11 shows combined CWEP and ESP county-level costs, and the reimbursable and nonreimbursable portions of these costs, by county for the period October, 1984 - September, 1986. As expected, Itasca County, with the highest level of participation, also had the highest cost at \$155,575 -- 43.5% of the seven-county total of \$357,311. Itasca was also the only county whose total cost was less than 50% reimbursable. This is because that county incurred all of the costs in those categories not eligible for 50% reimbursement -- employee compensation for direct supervision of CWEP participants on work assignments and costs of materials and equipment used in CWEP work projects (see Table 10). In the category of direct supervision of CWEP participants, Itasca County employs an individual to supervise a roving CWEP work crew.

Table 11

Combined CWEP and ESP Cost at County Level, Amount and Percentage Reimbursable, /a and Amount Nonreimbursable by County, October, 1984 - September, 1986

County	Total Cost	Reimbursable Portion <u>/a</u>		Amount Nonreimbursable
		Amount	Percentage	
Blue Earth	\$ 17,263	\$ 8,632	50.0%	\$ 8,631
Dodge	3,932	1,966	50.0	1,966
Itasca	155,575	48,524	31.2	107,051
Morrison	56,665	28,332	50.0	28,333
Otter Tail	34,182	17,091	50.0	17,091
Todd	43,164	21,582	50.0	21,582
Winona	46,530	23,265	50.0	23,265
TOTAL	\$357,311	\$149,392	41.8%	\$207,919

a. The amounts reimbursable are reimbursable by the Federal government under the AFDC administrative-match formula.



## Chapter 4

### HOW ASSISTED JOB SEARCH AND WORK ASSIGNMENT HAVE AFFECTED PARTICIPANTS

This chapter presents information on how assisted job search and work assignment have affected participants -- to what extent these activities have helped participants find employment and how they have affected participants in other ways. Section I presents views from participants as expressed in a survey; section II presents views from program staff in the counties.

#### I. VIEWS FROM PARTICIPANTS

CWEP participants were surveyed to determine how they viewed their CWEP work experience. The survey pertained only to the work assignment -- and not to assisted job search -- for two reasons: First, there seems to be more uncertainty, and disagreement, about the benefits of the work assignment to participants than is true with assisted job search. Second, limiting the questionnaire to the work assignment allowed it to be kept to a manageable length.

The questionnaire was administered from August through December, 1986 to CWEP participants who had been on work assignments at least two months. Participants meeting this criterion were invited by their work supervisors to fill out questionnaires while on their work assignments, and were given postage-paid envelopes addressed to DHS for returning the questionnaires.

Individuals who were asked to take part in the survey were told that their responses would be anonymous, which was assured by having them return their questionnaires directly to DHS.

The questionnaire appears in Appendix E.

A total of 171 CWEP participants were asked to fill out questionnaires, and 58 did so, for a response rate of 34%. Because of this response rate, the results should be viewed with caution since those who completed questionnaires may tend to have different views on CWEP than those who did not. In addition, the responses, when viewed as estimates of how a large population of similar individuals would answer the questions, are subject to random error because of the smallness of the sample. /15

The questionnaire results are shown in Table 12. Note that for all items except 1 and 2, the percentages are relative to those respondents answering the question concerned.

Table 12

## Results from CWEP Participant Questionnaire /a

	Number	Percentage /b
1. Respondents	58	
2. County:		
Blue Earth	2	3.4%
Dodge	2	3.4
Itasca	40	69.0
Morrison	3	5.2
Otter Tail	0	0.0
Todd	5	8.6
Winona	6	10.3
3. Age:		
0-29	24	41.4
30-39	25	43.1
40-49	6	10.3
50+	3	5.2
N.R.	0	NAP
4. Sex:		
Male	52	89.7
Female	6	10.3
N.R. /a	0	NAP
5. Education:		
No high school diploma or GED	20	34.5
High school diploma or GED, no college	26	44.8
Some college	10	17.2
College degree	2	3.4
N.R.	0	NAP
6. Completed a trade or vocational program or an apprenticeship before CWEP?		
Yes	25	43.1
No	33	56.9
N.R.	0	NAP

Table 12 (continued)

	Number	Percentage /b
7. Hourly wage of longest job:		
\$0-3.99	11	22.0%
4.00-5.99	15	30.0
6.00-7.99	5	10.0
8.00-9.99	5	10.0
10.00-11.99	5	10.0
12.00+	9	18.0
N.R.	8	NAP
8. Hours per week at longest job:		
0-29	0	0.0
30-39	3	5.9
40	31	60.8
41-49	12	23.5
50+	5	9.8
N.R.	7	NAP
9. Years longest job held:		
0-1.9	10	18.2
2.0-3.9	15	27.3
4.0-5.9	6	10.9
6.0-7.9	6	10.9
8.0-9.9	9	16.4
10.0+	9	16.4
N.R.	3	NAP
10. CWEP participation required?		
Yes	52	91.2
No	5	8.8
N.R.	1	NAP
11. Like or dislike CWEP work?		
Like it very much	30	51.7
Like it somewhat	14	24.1
Do not really like or dislike it	4	6.9
Dislike it somewhat	4	6.9
Dislike it very much	6	10.3
N.R.	0	NAP

Table 12 (continued)

	Number	Percentage /b
12. Gain satisfaction from CWEP work?		
Yes, very much	31	53.4%
Yes, some	18	31.0
No, none	9	15.5
N.R.	0	NAP
13. Treated with respect or disrespect by CWEP work supervisor(s)?		
Always with respect	43	75.4
With respect most of the time	9	15.8
With respect about as often as disrespect	3	5.3
With disrespect most of the time	1	1.8
Always with disrespect	1	1.8
N.R.	1	NAP
14. Treated fairly or unfairly by CWEP work supervisor(s)?		
Always fairly	44	78.6
Fairly most of the time	7	12.5
Fairly about as often as unfairly	2	3.6
Unfairly most of the time	2	3.6
Always unfairly	1	1.8
N.R.	2	NAP
15. a. Regular employees, besides supervisor, present at worksite(s)?		
Yes	47	81.0
No	11	19.0
N.R.	0	NAP
b. "If so, have they ever treated you with disrespect because you are on welfare?"		
No, never	36	76.6
Yes, but only once or a few times	7	14.9
Yes, often	1	2.1
Yes, most of the time	0	0.0
Yes, always	3	6.4
N.R.	0	NAP
16. a. Learned any new skills from CWEP work?		
Yes	29	50.0
No	29	50.0
N.R.	0	NAP

Table 12 (continued)

	Number	Percentage <u>/b</u>
b. "If so, do you think any of these skills are useful for getting a regular job?"		
Yes	20	69.0%
No	3	10.3
Not sure	6	20.7
N.R.	0	NAP
17. a. "Has your CWEP work done anything else that might help you get a regular job?"		
Yes	26	44.8
No	22	37.9
Not sure	10	17.2
N.R.	0	NAP
b. "If so, what?"		
More of a work history with references	17	65.4 <u>/c</u>
Job leads or job contacts	6	23.1
More self-confidence	12	46.2
More motivation to find regular job	10	38.5
Improved or maintained work habits	19	73.1
Other	1	3.8
N.R.	0	NAP
18. Better prepared to get a regular job, through new job skills or in other ways, because of CWEP work? (based on answers to 16 and 17) <u>/d</u>		
Yes	30	51.7
No	22	37.9
Not sure	6	10.3
N.R.	0	NAP
19. "Has your CWEP work prevented you from looking for a regular job as much as you would like?"		
Yes	19	32.8
No	39	67.2
N.R.	0	NAP

Table 12 (continued)

	Number	Percentage /b
20. Did participant pay any participation expenses without full reimbursement?		
Yes	8	13.8%
No	50	86.2
N.R.	0	NAP
21. "Has your CWEP work made being on welfare a better or worse situation for you?"		
Much better	18	31.6
Somewhat better	16	28.1
No better or worse	14	24.6
Somewhat worse	3	5.3
Much worse	6	10.5
N.R.	1	NAP
22. "Has your CWEP work made you respect yourself any more or less?"		
Much more	16	27.6
Somewhat more	17	29.3
No more or less	17	29.3
Somewhat less	3	5.2
Much less	5	8.6
N.R.	0	NAP
23. "Has your CWEP work made your family and friends respect you any more or less?"		
Much more	9	15.5
Somewhat more	10	17.2
No more or less	24	41.4
Somewhat less	4	6.9
Much less	3	5.2
Not sure	8	13.8
N.R.	0	NAP
24. "Has your CWEP work made your home life any better or worse?"		
Much better	11	19.0
Somewhat better	16	27.6
No better or worse	23	39.7
Somewhat worse	3	5.2
Much worse	5	8.6
N.R.	0	NAP

Table 12 (continued)

	Number	Percentage <u>/b</u>
25. "Overall, do you think that working in CWEP has been good or bad for you?"		
Very good	24	41.4%
Fairly good	16	27.6
Neutral; as much good as bad	11	19.0
Fairly bad	3	5.2
Very bad	4	6.9
N.R.	0	NAP
26. "Do you think welfare recipients should be required to work in return for their welfare benefits if they are able to work?"		
Yes	39	68.4
No	8	14.0
Not sure	10	17.5
N.R.	1	NAP

- a. "N.R." denotes "no response."
- b. For all items but 1 and 2, the percentages are relative to those answering the question.
- c. These percentages add up to more than 100% because respondents could check more than one item.
- d. The individuals coded as "yes" in item 18 consist of those who answered "yes" to items 16a and 16b, or "yes" to item 17a, or both. Those coded as "no" in item 18 consist of the individuals who answered "no" to 16a or 16b, and "no" to 17a. Those coded as "not sure" in item 18 consist of the respondents who were not coded as "yes" or "no" and who answered "yes" to 16a and "not sure" to 16b, or "not sure" to 17a, or both. Those whose answers did not allow them to be placed in one of these categories were tabulated as "N.R." (no response).

Items 2-10 give background information on the respondents, which should be taken into account in considering their views on their CWEP work experience. The overall response was heavily weighted toward Itasca County, with 69.0% of the completed questionnaires coming from that county (item 2). This proportion is close to the proportion of all work-assignment participants during the report period who were in Itasca County, 64% (Table 2). The respondents were predominantly younger than 40 (84.5%) and male (89.7%) (items 3 and 4). About two-thirds had earned a high-school diploma or GED, about a fifth had taken college courses, and 43.1% had previously completed a trade or vocational program or an apprenticeship (items 5 and 6). Approximately half of the respondents had earned \$6.00 per hour or more at their longest jobs, and 94.1% had worked at least 40 hours per week at these jobs (items 7 and 8). About 46% had held their longest jobs less than four years, while about 33% had held these jobs eight years or longer (item 9). For 91.2% of the respondents, CWEP participation was mandatory (item 10).

Items 11 through 25 provide a picture of CWEP work experience through the participants' perspective. As shown in item 11, 51.7% of the respondents said they liked their CWEP work very much and another 24.1% indicated that they liked it somewhat, while 17.2% said they disliked their CWEP work. When asked whether they found satisfaction in their CWEP work, 84.5% indicated "yes, very much" or "yes, some," while 15.5% answered "no, none" (item 12).

Regarding treatment of participants by CWEP work supervisors, 91.2% of the respondents said their supervisors treated them with respect all or most of the time, and almost the same percentage said their supervisors treated them fairly all or most of the time (items 13 and 14). Of those at worksites where regular employees besides the supervisor were present, about a quarter said regular employees had treated them disrespectfully because they were on welfare, although for a majority of these participants this had occurred only once or a few times (item 15).

CWEP is intended to help participants obtain employment, either by teaching new skills or by other means. Items 16 and 17 provide some indication of the extent to which this occurs. Asked whether they had learned any new skills from their CWEP work experience, 50% of the respondents said "yes," and 69% of these said they thought the skills they had learned were useful for finding a regular job, meaning that 34.5% (69% of 50%) thought they had learned skills useful for finding a regular job (item 16). When asked whether their CWEP work had done anything else that might help them get a regular job, 44.8% said it had (item 17a). Those answering "yes" were asked to indicate how this had occurred by checking appropriate items on the questionnaire (item 17b). The items most frequently indicated were "it has improved or kept up my work habits" and "it has given me more of a work history with references" (73.1% and 65.4%, respectively, of those answering "yes" to 17a).

Item 18 is a summary of items 16 and 17. It indicates, according to the answers to 16 and 17, (1) the number of respondents who believed that their CWEP work had helped prepare them in any way to find employment (either by teaching them new skills or otherwise), (2) the number who

believed that this was not true, and (3) the number who were unsure (see note d in table). As shown in item 18, 51.7% of the respondents thought their CWEP work had helped prepare them in one way or another to find employment, 37.9% thought it had not, and 10.3% were unsure.

Items 19 and 20 relate to possible costs of CWEP work experience for participants. Participants are supposed to be allowed one business day off per week from their work assignments to be able to search for employment. However, 32.8% of the respondents said their CWEP work had prevented them from looking for regular employment as much as they would have liked (item 19). This result should be viewed with caution, though, because of those responding "yes" to this item, only 32% were working more than 80 hours per month on their work assignments, and only 16% were working more than 100 hours per month (according to questionnaire results not shown).

Individuals are not supposed to incur any financial costs from participating in CWEP; counties are required to reimburse CWEP participants for all necessary expenses as a result of their work assignment. However, 13.8% of the respondents indicated that they had incurred expenses because of their work assignments without full reimbursement (item 20). The most common nonreimbursed expenses indicated were for work clothes such as boots and gloves. DHS is pursuing both this matter and the issue of participants' ability to conduct independent job search (previous paragraph) with the CWEP counties.

Items 21-24 concern other aspects of how CWEP affects participants. When asked whether their CWEP work had made being on welfare a better or worse situation for them, 59.7% of those answering said "somewhat better" or "much better," while 15.8% said "somewhat worse" or "much worse" (item 21). Regarding effects of the CWEP work experience on self-respect, 56.9% said their CWEP work had increased their self-respect while 13.8% said it had done the opposite (item 22). Asked whether their CWEP work had made their family and friends respect them any more or less, 55.2% said "no more or less" or "not sure," 32.7% indicated "more," and 12.1% indicated "less" (item 23). Concerning home life, 46.6% said their CWEP work had improved their home life while 13.8% believed it had worsened it (item 24).

To gauge the respondents' views on whether CWEP had been beneficial to them on the whole, they were asked, "Overall, do you think that working in CWEP has been good or bad for you?" In response, 69.0% said CWEP had been good for them (with 41.4% indicating "very good"), 19.0% answered "neutral," and 12.1% said CWEP had been bad for them (with 6.9% indicating "very bad") (item 25).

Finally, concerning the desirability in principle of a work requirement for welfare recipients, the respondents were asked, "Do you think welfare recipients should be required to work in return for their welfare benefits if they are able to work?" A strong majority of these CWEP participants, 68.4%, responded "yes," 14.0% said "no," and 17.5% were unsure (item 26).

Overall, the favorable responses toward the CWEP work experience far outnumbered the unfavorable responses; however, the proportion of unfavorable responses is not trivial.

The previous CWEP report to the legislature presented results from an earlier participant survey; the results presented here are broadly consistent with the earlier results. /16

## II. VIEWS FROM PROGRAM STAFF

County and service-provider staff were asked several questions on how assisted job search and work assignment had affected participants; the themes in their responses follow.

### A. Effects of Assisted Job Search

The program staff all expressed a belief that assisted job search had helped many participants find employment, or had helped prepare them to find employment, by improving their job-search skills and providing assistance with actual job search through activities such as those described in Chapter 2, section II. Some program staff indicated that activities in job-search skills training had also helped prepare participants for job search by increasing their motivation and self-confidence and by reducing their fears of job search. One staff person highlighted the value to the participant of seeing other people in the same situation and realizing that he or she is not alone, of sharing experiences and discussing problems, and of receiving peer support.

Another staff person wrote the following:

Group interaction and individual attention has helped individuals overcome barriers such as lack of motivation, lack of confidence, fear of failure, and a negative attitude. A positive attitude is fostered and help is provided in dealing with problem areas. Also, participants have the opportunity to meet others from their community who are also looking for work, and this broadens the number of job leads. Individuals who participated in job-seeking skills classes learned to take pride in their skills and personal assets, and gained in self-confidence as they learned basic skills of job hunting. For some, attention to personal appearance increased. Job goals became more realistic for some, more focused for others. Overall, a more work-oriented attitude developed among participants and these participants were better prepared to look for work during the job search period.

(quote continued on next page)

Individual attention to each participant's efforts during job search helps bolster motivation and helps maintain a positive attitude. Possible job leads are more readily available to individuals during an assisted job search. Help is provided in dealing with problem areas, such as a poor work record, felony convictions, and health problems. In some cases, participants in a job-seeking skills class share job leads with other participants.

## **B. Effects of Work Assignment**

As with assisted job search, the program staff all expressed a belief that work assignment had helped prepare many of its participants to find employment. They indicated that this had occurred, in varying degrees, through an improved and more recent work history with references (e.g. the CWEP work supervisor), greater self-confidence and motivation, improved work habits (complying with rules and expectations of a regular job), increased resources and leads for finding employment, and, in some cases, new job skills.

Some staff emphasized that a successful work assignment is likely to improve self-esteem for participants who have had low self-esteem, and that this is crucial in bringing these people to the point where they can apply themselves to searching for regular employment. One staff person said that in some cases, the work experience has helped to change a participant's belief that he or she cannot do anything but be on welfare.

Another staff person wrote that for some individuals, the CWEP work experience is valuable primarily as one step in a longer process of attaining job-readiness:

Clients who are not motivated to work and have been unemployed for a long period of time are, nevertheless, through the CWEP work experience placement, helped to feel better about themselves. Their self-esteem has been improved, and they are better prepared to enter the next phase of their rehabilitation program.

Many of these clients have had repeated failures in the community. They have failed in their family life, in school, and in other community activities. They are frequently law violators. A long rehabilitation process may be necessary before some of these individuals are job-ready and employed. Work experience placement does seem to help these clients to develop better work habits and to develop an interest in being employed.

Program staff are asked to report cases where individuals have obtained regular employment clearly with the help of their CWEP work experience (excluding instances where it is not evident that the work experience has played a major role). For the period October, 1984 - September, 1986, 11 instances were reported where participants were hired by their work sponsors as regular employees. Where participants find jobs with

employers other than their CWEP work sponsors, program staff often have little or no information regarding the role of the CWEP work experience in securing the employment. However, the staff persons reported occasional instances, over the same period, where participants found jobs with employers other than the CWEP work sponsor doing the same type of work as in CWEP, sometimes in specialized fields and sometimes with no experience prior to CWEP in the type of work concerned.

Apart from helping prepare participants to find employment, or helping them actually find jobs, the CWEP work experience, according to some program staff, had been beneficial to some participants in such ways as increasing their self-esteem (also mentioned in regard to finding employment), helping them to "come out of a shell," improving interaction with others, providing a purpose and routine for the day, and fostering a sense of being part of the community through being part of the work force. According to one staff person, another value of the work assignment (though not a direct benefit to the participant) is providing a better role model for the participant's children.

### **C. Some Participants Not Helped**

A majority of the program staff indicated that some individuals have not been helped significantly by assisted job search or work assignment, because of factors such as personal problems (e.g. chemical abuse, physical or mental limitations, psychological problems), lack of motivation, long-standing patterns of welfare dependence, or lack of suitable jobs in the locality.

## Chapter 5

### BENEFITS TO THE PUBLIC

This chapter concerns benefits of ESP and CWEP to the public. One of these benefits is the work performed by CWEP participants; another is a possible reduction in AFDC payments.

#### I. NATURE AND VALUE OF WORK PERFORMED BY CWEP PARTICIPANTS

While the work done by CWEP participants is of value to the community, this value is difficult to assess. In concept, it is what everyone benefitting from the work would be willing to pay for it. It is not feasible, however, to determine this quantity.

One alternative is merely to consider the nature of the work performed and where it is performed. To a large degree, such information is conveyed by the data in Tables 6 and 7 (Chapter 3, secs. III,IV). However, to obtain additional information, CWEP staff with the counties and service providers were asked to describe some of the work done by participants since October, 1984, including both the typical and the atypical; the following is some of the work indicated, with the more common types listed first:

- maintenance and repair of streets and of county, township, and State roads;

- maintenance, repair, and custodial work in schools and county buildings including hospitals and nursing homes;

- grounds maintenance at public buildings and along roadsides;

- maintenance of parks, recreational facilities, and public accesses to lakes;

- clerical work including typing, filing, bookkeeping, and, in one instance, organizing and setting up a career library in a school;

- snow removal on roads and at buildings and fire hydrants;

- complete maintenance of a golf course, including making new greens and sand traps;

- assistance at food banks, including distribution of food baskets at Christmas;

- construction of ramps for the handicapped at public buildings;

making signs at the U.S. Department of the Interior for nationwide use by the National Park Service;

forestry work for the Minnesota Department of Natural Resources, including pruning on a pine plantation and drawing maps from aerial photos;

assisting in a facility for mentally retarded adults, including helping with a recycling project and a used-clothing facility and with gardening and processing of produce;

sewing of craft products for a nursing home.

In an unusual case, a participant with a college degree in biology worked as an environmental technical trainee with the county health department, doing research and on-site inspection. In a different county, where the county social service agency had purchased new quarters, CWEP participants played a major role in gutting and remodeling the building. CWEP participants in another county carried out a remodeling project for a youth center.

Another alternative for assessing the value of work done by CWEP participants is to assume that an average hour of this work has a particular value, and then multiply the number of hours of work by this assumed value. Such a calculation was performed, using the minimum wage of \$3.35 as the assumed value per hour. This figure is, of course, arbitrary. Many would probably regard it as conservative for present purposes. On the other hand, \$3.35 could be too high, since it is uncertain that the public would be willing to pay this much per hour of the work performed.

The seven CWEP counties reported that CWEP participants performed a total of 160,863 hours of work from October, 1984 through September, 1986. Multiplying this number by \$3.35 gives a figure of \$538,891 as the estimated value of work performed. For reasons previously indicated, this amount can only be taken as suggestive. However, it substantially exceeds the total CWEP and ESP cost of \$387,457 for the seven counties for October, 1984 - September, 1986. Moreover, if the value of output is to be estimated as the value of input, which is being done here, it would be appropriate to include the costs of materials, equipment, and participant supervision in the estimated value of output, although these are excluded. Again, however, any estimate from this technique can only be regarded as suggestive.

## II. EFFECTS ON AFDC PAYMENTS

Another possible benefit of ESP and CWEP to the public is a reduction in AFDC payments occurring through a reduction in caseload. This section first discusses how ESP and CWEP may affect the AFDC caseload and then

describes an effort that was made to statistically estimate whether such an effect has occurred.

#### **A. How ESP and CWEP May Affect the AFDC Caseload**

Theoretically, either ESP or CWEP may reduce or increase the AFDC caseload.

ESP or CWEP may reduce caseload by increasing the ability of participants to find employment in ways described in Chapter 4. In addition, ESP or CWEP, because of the participation requirements for nonexempt individuals, may reduce caseload by making AFDC a less attractive option (than without ESP or CWEP) for those nonexempt individuals who would rather engage in other activities than participate in ESP or CWEP if on AFDC.

However, ESP or CWEP may increase caseload by making AFDC a more attractive option (than without ESP or CWEP) for those individuals, both exempt and nonexempt, who would rather participate in the program than pursue other activities if on AFDC. Such individuals, for example, may value the opportunity to provide something in return for their AFDC benefits through working in CWEP; may enjoy the activities in ESP, the work in CWEP, or the contacts with people in either program; or may merely value the chance to do something outside of the house. Another possibility is that mandatory participation in CWEP may increase caseload by impeding job search for some individuals, thus reducing their chances of finding regular employment. (Although this is not supposed to occur, results from the participant questionnaire suggest that it has occurred in some cases. /17)

Thus, theoretically, either ESP or CWEP may reduce or increase the AFDC caseload.

#### **B. An Attempt to Estimate the Effect of the Combined Program on AFDC-UP Case Duration**

DHS Staff performed a statistical analysis to estimate whether the combined program of assisted job search and work assignment has affected AFDC-UP case duration (i.e. the amount of time a case stays on AFDC). However, the results were inconclusive.

The study was limited to UP cases because the program is mandatory only for UPs. UP case duration was used as the outcome variable because of an assumption that if the program affects caseload, it probably does so primarily by affecting case duration. (The program may also affect caseload by affecting the number of case openings per month.)

The study involved Morrison and Todd Counties, with Douglas and Wadena Counties (which are adjacent to Todd and near Morrison) included for comparative (or "control") purposes. These counties were chosen because of the availability of necessary data. /18

The analysis used individual UP case data for each county. Since the programs in Morrison and Todd Counties began in November, 1984, the sample consisted of those UP cases, in all four counties, that opened from November, 1982 through October, 1983 ("period one," before CWEP started) and from November, 1984 through October, 1985 ("period two," after CWEP started). (Assisted job search was under CWEP during this time.) The outcome variable was defined, precisely, as the number of months the case received AFDC during the 12-month period that began with the month in which the case opened. /19 This variable, referred to here as DURATION (even though it was limited to 12 months), was recorded for each case along with other information used for control purposes (see below).

The analysis used a statistical technique called multiple regression analysis. Basically, the procedure was as follows: First, the change in DURATION from period one to period two was determined for each county. Then, the changes that occurred in the CWEP counties were compared to the changes that occurred in the non-CWEP counties, with the difference being attributed to the effect of CWEP.

In this comparison, control was provided for several factors other than CWEP, including economic conditions, that could also affect DURATION (see below). This produced an estimate of the change in DURATION in each county, from period one to period two, that would have occurred if the controlled factors had been "held constant" -- that is, if they had been the same for all cases in the sample. This estimated change in DURATION for each county was the quantity used in the comparison indicated above.

The controlled factors were the following: the quarter in which the case opened (to capture seasonal factors), number of children, presence of children under age 6, age of husband, whether the principal earner was the husband or wife, total earnings used to compute the initial monthly AFDC grant, and, finally, economic conditions in the particular county during the 11 months beginning with the month in which the case opened. In different versions of the analysis, the variable used to represent, and thus control for, economic conditions was, alternately, total "covered" employment (covered under Unemployment Insurance (UI)) or the number of UI claimants, each for the particular county at the relevant time for the particular case. (The analysis was conducted in such a way that differences across counties in total covered employment and in total UI claimants did not matter. The only variation in these variables that was allowed to have an effect was variation over time within each county.)

The central assumption was that without CWEP, the change in DURATION from period one to period two that would have occurred with the controlled variables "held constant" would have been the same in the CWEP counties as in the non-CWEP counties. On this assumption, the effect of the program (including assisted job search and work assignment) was estimated as the difference between the CWEP and non-CWEP counties in the estimated change in DURATION with the control provided.

Under the same assumption, if the program caused a reduction in DURATION, then, from period one to period two, after controlling for the factors indicated, DURATION would either (1) decrease by a greater amount in the CWEP counties than in the non-CWEP counties, (2) decrease in the CWEP counties while increasing in the non-CWEP counties, or (3) increase by a smaller amount in the CWEP counties than in the non-CWEP counties. If, instead, the program caused an increase in DURATION, then the opposite comparative results would be expected to occur.

Unfortunately, certain patterns in the results indicated that the results were unreliable. First, even with control provided for all of the factors indicated above, the change in DURATION from period one to period two, in addition to being different between the CWEP and non-CWEP counties, was substantially different between the two CWEP counties and between the two non-CWEP counties. It was thus clear that there were major factors, other than CWEP and not controlled in the analysis, that were causing the change in DURATION from period one to period two to be different in different counties. Second, the estimated change in DURATION for each county, with the control provided, was markedly different depending on whether the variable used to control for economic conditions was total covered employment or the number of UI claimants; this indicated that at least one of these variables, or perhaps both, fell far short of fully representing, and thus controlling for, the economic opportunities available to AFDC-UP recipients. Unfortunately, better variables for this purpose do not seem to be available. /20

Thus, no inferences could be drawn, from this statistical analysis, about whether the combined program of assisted job search and work assignment affects AFDC caseload and payments.

### C. Concluding Remarks

These results were obtained after a systematic effort, in an inherently uncontrolled environment, to control to the fullest extent possible for factors other than CWEP that could affect DURATION. In view of this, the prospect appears slim for obtaining dependable results regarding the effects of the program on caseload without using an experimental design involving random assignment of individuals to treatment and control groups.

One problem with random assignment, where a voluntary program is concerned, is that those assigned to the control group must be denied the opportunity to participate. However, with ESP-CWEP, since participation is mandatory for nonexempt UPs, the treatment could be specified to be the presence of a participation requirement, as opposed to the absence of such a requirement but still with the opportunity to participate voluntarily. With this specification of the treatment, otherwise-nonexempt individuals would be randomly assigned to a treatment group subject to a participation requirement or to a control group not under such a requirement but still allowed to participate. Thus, no one would be denied the opportunity to

participate. The analysis would estimate the effect of having a program with a participation requirement as opposed to having a totally voluntary program.

Another alternative would be to estimate the effect of having a program with mandatory participation as opposed to not having a program at all. However, with random assignment, this would require that those in the control group be denied the opportunity to participate.

In any event, a study with random assignment would be a major undertaking requiring significant commitment and expense.

## Appendix A

### FEDERAL CWEP REGULATIONS

Code of Federal Regulations, Title 45, Part 238, revised as of October 1, 1985:

#### Subpart A—Introduction

##### § 238.01 Scope of this part.

*General.* States may operate community work experience programs (CWEP) which serve a useful public purpose, and require AFDC recipients to participate in them as a condition of AFDC eligibility. The purpose of these CWEP programs is to provide work experience for AFDC recipients. CWEP projects must meet appropriate standards for health and safety and may not displace persons currently employed or fill established unfilled vacancies. Subject to the conditions specified at § 238.16, States must provide necessary transportation, day care, and other related services or reimburse CWEP participants for costs directly related to participation in the program. Allowable costs to operate CWEP (see Subpart D) are matched by the Federal government at the AFDC administrative match level (50%).

(Sec. 1102, Social Security Act, as amended, 49 Stat. 647, as amended; 42 U.S.C. 1302)  
[49 FR 35603, Sept. 10, 1984]

#### PART 238—COMMUNITY WORK EXPERIENCE PROGRAM

##### Subpart A—Introduction

Sec.  
238.01 Scope of this part.

##### Subpart B—Administration and Program Requirements

238.10 Agency administering the program.  
238.12 Statewideness.  
238.14 Establishment of a mandatory participant group.  
238.16 Participant reimbursement.  
238.18 Participant protection.  
238.20 Participation requirements.  
238.22 Sanctions.  
238.24 Hearings and notices.  
238.26 Chief Executive Officer.

##### Subpart C—Sponsor and Project Requirements

238.50 Sponsor requirements.  
238.52 Project requirements.  
238.54 Project assignment criteria.

##### Subpart D—Federal Financial Participation

238.60 Allowable administrative costs.  
238.62 Expenses not matchable.  
238.64 Fiscal recordkeeping requirements.

**AUTHORITY:** Sec. 2307, Pub. L. 97-35; 95 Stat. 846; (42 U.S.C. 609), unless otherwise noted.

**SOURCE:** 47 FR 5683, Feb. 5, 1982, unless otherwise noted.

##### Subpart B—Administration and Program Requirements

§ 238.10 Agency administering the program.

Each State with a plan approved under Title IV-A of the Social Security Act may establish and operate a CWEP program in accordance with the requirements in this part. If the State chooses to establish and operate CWEP, it must administer the program through the single State agency designated in its title IV-A State plan to administer or supervise the AFDC program.

§ 238.12 Statewideness.

The State plan shall specify the geographic areas for which the State will implement CWEP. These may include all areas of the State or only certain subareas at the Agency's discretion.

**§ 238.14 Establishment of a mandatory participant group.**

(a) The State plan must identify the groups or categories of AFDC recipients who will be required to participate in CWEP. Under this requirement, States may require that any AFDC recipient, as a condition of eligibility for AFDC, participate in CWEP unless the individual:

(1) Meets the WIN exemption criteria under 45 CFR 224.20, except as provided in paragraph (b) of this section;

(2) Is both currently employed for at least 80 hours per month and earning not less than the legally established or defined minimum wage for such employment (for jobs which do not have an established minimum wage, recipients currently employed 80 hours must be exempted from CWEP regardless of wage level.);

(3) Was denied AFDC solely because the amount of his or her entitlement would have been less than \$10 per month;

(b) A recipient who is exempt from WIN may nevertheless be required to participate in CWEP if:

(1) He or she was exempt due to remoteness from a work incentive project under § 224.20(b)(6); or

(2) He or she was exempt as a caretaker of a child at least three years old, under § 224.20(b)(8), and appropriate child care can be secured to enable participation in the CWEP project.

(c) Applicants for aid to families with dependent children may not be required to participate in CWEP.

(d) A State plan may provide for voluntary participation in CWEP projects by all, or any subgroups, of AFDC recipients who desire to do so. If the plan provides for voluntary participation, it will identify the categories of voluntary participants to whom CWEP is available and any conditions which attach to their participation.

**§ 238.16 Participant reimbursement.**

The State plan shall specify the amount and types of participation costs the State will reimburse to recipients. Under this requirement:

(a) Participants may not be required to use their assistance or their income or resources to pay participation costs

which are within the limits specified as allowable in paragraph (b).

(b) In cases where the State is unable to provide necessary services directly to participants or through a third party, States must provide reimbursement for necessary transportation and day care costs that are incurred by the recipient and directly related to participation in CWEP.

(1) Participants shall be reimbursed for transportation costs directly related to their participation in amounts equal to the cost of transportation by the most appropriate means (as determined by the State agency); and

(2) Participants shall be reimbursed for day care costs in such amounts as are determined by the State agency to be reasonable, necessary, and cost-effective. However, in no event shall the reimbursement exceed the amounts allowed to a recipient working the same number of hours under § 233.20(a)(11)(i)(C) as a disregard from earned income.

(c) States must provide reimbursement for costs other than transportation and day care that the State determines are necessary and directly related to participation in CWEP incurred by the participant. For FFP purposes, this amount shall not exceed \$10 per month, per participant. (See Subpart D for FFP requirements.)

(Sec. 1102, Social Security Act, as amended, 49 Stat. 647, as amended; 42 U.S.C. 1302)

[49 FR 35603, Sept. 10, 1984]

**§ 238.18 Participant protection.**

States may provide worker's compensation or other comparable protection for their CWEP participants. The State agency shall provide such protection to those participants performing work for Federal offices or agencies, to the same extent as is provided to other CWEP participants in the State. The cost of this protection shall be considered an administrative expense and matched accordingly.

(Sec. 1102, Social Security Act, as amended, 49 Stat. 647, as amended; 42 U.S.C. 1302)

[49 FR 35603, Sept. 10, 1984]

**§ 238.20 Participation requirements.**

(a) States determine CWEP participation within broad Federal requirements:

(1) Where more than one member of an assistance unit meets the criteria, under the State's plan for participation in CWEP, the State may require that each eligible individual participate in accordance with paragraph (b) of this section.

(2) Part-time participation in WIN and CWEP may be required where it is deemed appropriate by the State. The State plan shall specify whether part-time participation will be required and the circumstances under which it will be deemed "appropriate."

(b) The State plan must specify the maximum number of hours and the formula used to determine the mandatory hours of participation where the State specifies a lesser maximum. No assistance unit may be required monthly to participate in CWEP more than the number of hours which would result from dividing the family's grant amount by the greater of the Federal or the applicable State minimum wage.

(c) The State must have procedures under which there is coordination among CWEP, the employment search program, and WIN to ensure that job placement will have priority.

(d) Nothing in section 409 of the Act, nor in this part shall be construed as authorizing the payment of AFDC as compensation for work performed.

(e) CWEP participants who perform work in the public interest for a Federal office or agency shall not be considered for any purpose as Federal employees.

(Sec. 1102, Social Security Act, as amended, 42 U.S.C. 1302 and Pub. L. 97-248, 96 Stat. 324)

[47 FR 5683, Feb. 5, 1982, as amended at 48 FR 28410, June 21, 1983; 49 FR 35604, Sept. 10, 1984]

**§ 238.22 Sanctions.**

The State plan shall provide that where a mandatory CWEP participant has been determined to have failed or refused without good cause to participate in CWEP, the sanctions specified in § 224.51 (and further described in § 234.60) shall apply. Under this re-

quirement the State plan shall specify the criteria to be used in determining whether or not there was "good cause" in refusing or failing to participate in CWEP.

**§ 238.24 Hearings and notices.**

The State plan shall specify that the provisions of § 205.10, which relate to hearing and notice procedures, apply to CWEP participants.

**§ 238.26 Chief Executive Officer.**

The Chief Executive Officer of the State:

(a) Shall provide for coordination among CWEP, the program of employment search and WIN to ensure that:

(1) Job placement will have priority; and

(2) An individual who is required to participate in more than one of the programs identified in this section may not be denied aid under the State plan on the grounds of "failure to participate" in one such program if there is a conflict in the implementation or scheduling of activities between programs, and he is satisfactorily participating in the other program.

(b) May require that a participant who satisfactorily meets the requirements of CWEP may be required to participate in a program of employment search or WIN during such time as he is not participating in CWEP.

(Sec. 1102, Social Security Act, as amended, 42 U.S.C. 1302 and Pub. L. 97-248, 96 Stat. 324)

[48 FR 28410, June 21, 1983]

**Subpart C—Sponsor and Project Requirements**

**§ 238.50 Sponsor requirements.**

The State agency will designate a sponsor to operate each project or, at the agency's option, more than one project. Only public agencies, which includes Federal offices or agencies, and nonprofit organizations may be sponsors. For purposes of this provision Federal offices or agencies include agencies of the Executive branch of the Federal government, Congressional offices, and Federal courts.

(Sec. 1102, Social Security Act, as amended, 49 Stat. 647, as amended; 42 U.S.C. 1302)  
[49 FR 35604, Sept. 10, 1984]

§ 238.52 Project requirements.

The State plan must provide that CWEP projects:

- (a) Serve a useful public purpose;
- (b) Do not result in the displacement of persons currently employed or the filling of established, unfilled position vacancies. This means that CWEP participants may not perform tasks which would have been undertaken by employees or which have the effect of reducing the work of employees. However, CWEP participants may perform the same type of tasks as performed by employees;
- (c) Are not in any way related to political, electoral, or partisan activities;
- (d) Are not in violation of applicable Federal, State or local health and safety standards, and provide reasonable work conditions; and
- (e) Have not been developed in response to, or in any way associated with, the existence of a strike, lockout or other bona fide labor dispute, or violate any existing labor agreement between employees and employers.

§ 238.54 Project assignment criteria.

The State plan must provide that:

- (a) Assignments to CWEP projects will take into consideration to the extent possible, the prior training, proficiency, experience and skills of a participant;
- (b) Participants will not be assigned to projects which require that they travel unreasonable distances from their homes or remain away from their homes overnight without their consent.

**Subpart D—Federal Financial Participation**

§ 238.60 Allowable administrative costs.

Federal financial participation is available for administrative costs of the AFDC program for Community Work Experience program expenditures, when CWEP has been approved as part of the State plan under Title IV-A of the Act. Such costs include

amounts paid to participants which are:

- (a) identified in the State plan; and
- (b) within the limits specified under § 238.16.

(Sec. 1102, Social Security Act, as amended, 49 Stat. 647, as amended; 42 U.S.C. 1302)  
[49 FR 35604, Sept. 10, 1984]

§ 238.62 Expenses not matchable.

FFP is not available for:

- (a) Capital expenditures, or depreciation or use allowances in connection with a CWEP;
- (b) The cost of making or acquiring materials or equipment in connection with participation in a CWEP project;
- (c) The cost of supervision of CWEP participants; and
- (d) Costs associated with the use of any facilities of the State public employment offices used to find employment opportunities for participants.

§ 238.64 Fiscal recordkeeping requirements.

To support claims for FFP, States shall identify in their accounting records all CWEP costs which represent direct payments to participants in the program. States must also identify in their monthly assistance rolls those individuals to whom participant expenditures were made during any month. The identification in the accounting records and monthly assistance rolls shall be in such form as to permit verification of the monthly direct payments to each individual participant subject to FFP.

## Appendix B

### FEDERAL ESP REGULATIONS

Code of Federal Regulations, Title 45, Part 240, revised as of October 1, 1985:

#### **PART 240—EMPLOYMENT SEARCH PROGRAM**

##### **Subpart A—Introduction**

Sec.

240.01 Scope of this part.

##### **Subpart B—Administration and Program Requirements**

- 240.10 Agency administering the program.
- 240.12 Statewideness.
- 240.14 Establishment of mandatory participant groups.
- 240.20 Program requirements.
- 240.22 Conditions of eligibility and sanctions.
- 240.24 Hearings and notices.

##### **Subpart C—Federal Financial Participation**

- 240.60 Allowable administrative expenses.
- 240.62 Expenses not matchable.
- 240.64 Fiscal recordkeeping requirements.

**AUTHORITY:** Sec. 1102, Social Security Act, as amended, 42 U.S.C. 1302; Pub. L. 97-248, 96 Stat. 324.

**SOURCE:** 48 FR 28410, June 21, 1983, unless otherwise noted.

**Subpart A—Introduction****§ 240.01 Scope of this part.**

Each State may operate a program of employment search and require certain AFDC applicants and recipients to participate in it as a condition of AFDC eligibility. The purpose of this employment search program is to reduce welfare dependency by assisting individuals in obtaining regular unsubsidized employment. Allowable costs to operate a program of employment search are matched by the Federal government at the AFDC administrative match level.

**Subpart B—Administration and Program Requirements****§ 240.10 Agency administering the program.**

Each State with a plan approved under title IV-A of the Social Security Act may establish a program of employment search in accordance with the requirements in this part. The single State agency designated in the State plan to administer or supervise the AFDC program must administer the employment search program.

**§ 240.12 Statewideness.**

The employment search program must be statewide. It may provide different employment search activities or impose different participation requirements based on an individual's characteristics.

**§ 240.14 Establishment of mandatory participant groups.**

(a) The State plan shall specify the groups, types, and classes of applicants and recipients who will be mandatory participants in the employment search program. These categories may only include individuals who would be required to register for WIN under § 224.20, and those excluded from registration requirements because of remoteness from a WIN site under § 224.20(b)(6).

(b) A State plan may also provide for voluntary participation in an employment search program in those not required to participate under paragraph (a) of this section. If the plan provides

for voluntary participation, it shall identify any conditions which attach to voluntary participation. States must inform voluntary participants of these conditions, if any.

(c) The State agency may exempt from employment search any applicant who does not appear to meet eligibility criteria for AFDC based upon a preliminary assessment it makes at the time the individual files his application. This process must not constitute informal denial of eligibility for assistance nor delay the processing of the application.

**§ 240.20 Program requirements.**

(a) The State plan must specify the requirements for participation (such as a minimal number of employer contacts a week or that a bona fide job offer cannot be refused without good cause). However, these requirements may vary for different categories of individuals depending on an individual's work history, etc. States must not impose requirements which would delay processing of an application. States may require that an individual participate in the employment search program from the time he files an application for aid for an initial period, prescribed in the State plan, of up to 8 consecutive weeks. Following this initial period (which may extend beyond the date when eligibility is determined), the States may require additional participation in employment search, not in excess of 8 weeks (or its equivalent) in any period of 12 consecutive months. The first such period of 12 consecutive months shall begin at any time following the close of the initial period.

(b) The State may assign individuals to any combination of CWEP, WIN, and employment search activities. The State plan must specify procedures for coordination among CWEP, WIN, and the employment search program to ensure that:

(1) Job placement will have priority; and

(2) An individual who is required to participate in more than one of the programs identified in this section may not be denied aid under the State plan on the grounds of "failure to par-

ticipate" in one such program if there is a conflict in the implementation or scheduling of activities between programs, and he is satisfactorily participating in the other program.

The State may require an individual to participate in a program of employment search during such time as he is not participating in CWEP or WIN.

(c) The State plan must also provide for methods to ensure that requirements for participation in employment search are met. The State must establish procedures enabling it to verify participation in the program.

(d) The State plan shall also provide that participants in the program:

(1) Are furnished those support services (such as transportation and child care) necessary for participation or

(2) Are paid in advance or reimbursed for expenses or such services which they reasonably incur (as defined by the State) in order to meet the requirements of the program.

The plan must specify how this requirement will be met and which services will be covered.

#### § 240.22 Conditions of eligibility and sanctions.

(a) The State plan shall provide for sanctions when a recipient, who is required to participate in the program of employment search, fails to meet the requirements for participation in that program, and shall also indicate the duration of the sanction periods which apply in cases of first or subsequent failures to participate. If a recipient fails to meet State requirements for participation in employment search, the sanctions specified below shall remain in effect for a period (effective no later than the first day of the corresponding payment month) up to 3 payment months for the first such failure and up to 6 payment months for any subsequent such failure.

(1) If the individual is a caretaker relative receiving benefits (other than a principal earner), the State shall not take into account his needs in determining the assistance unit's need for assistance. The State shall provide assistance in the form of protective or vendor payments in accordance with § 234.60 of this chapter;

(2) If the individual is one of several dependent children in the assistance unit, the State shall not take into account the child's needs in determining the assistance unit's need for assistance; if the individual is the only dependent child in the assistance unit, the State shall deny assistance to the entire unit; and

(3) If the individual is a principal earner, the State shall deny assistance to the entire assistance unit.

(b) The State plan shall provide that an applicant will remain ineligible for assistance for so long as he fails to meet the State requirements for participation in the employment search program:

(1) If the individual is a caretaker relative, the State shall not take into account his needs in determining the assistance unit's need for assistance. The State shall provide assistance in the form of protective or vendor payments in accordance with § 234.60 of this chapter;

(2) If the individual is one of several dependent children in the assistance unit, the State shall not take into account the child's needs in determining the assistance unit's need for assistance; if the individual is the only dependent child in the assistance unit the State shall deny assistance to the entire unit; and

(3) If the individual is a principal earner, the State shall deny assistance to the entire assistance unit.

(c) The State plan shall specify the criteria to be used in determining whether applicants and recipients have "good cause" for failing to meet State requirements for participation in employment search.

[49 FR 35604, Sept. 10, 1984]

#### § 240.24 Hearings and notices.

The State plan shall specify that the hearings and notice procedures at § 205.10 apply to applicants and recipients who are required to participate in employment search under this part.

**Subpart C—Federal Financial Participation**

**§ 240.60 Allowable administrative expenses.**

(a) Federal financial participation (FFP) is available at a 50 percent rate for reasonable expenditures which a State makes in implementing an employment search program. The State plan must specify the services and activities for which FFP will be claimed. Under this requirement, the plan must include those services and activities:

- (1) For which direct payment will be made to participants, whether in advance or by way of reimbursement;
- (2) For which payment will be made to third-party providers; and
- (3) Which the agency will provide directly to participants.

(b) FFP is available for direct payments to employment search participants for expenditures for transportation, child care, and other costs reasonably incurred by participants in meeting the requirements of the program.

(c) FFP is available for reasonable expenses incurred by the single State agency in providing services or in contracting with third-parties to provide services for its employment search program if the expenses are consistent with the approved employment search program. FFP is available for expenditures in employment search activities for applicants and recipients such as group jobseeking, job development, exposure to labor market information, work orientation, and referral which are necessary to assist individuals in locating unsubsidized employment.

**§ 240.62 Expenses not matchable.**

FFP is not available for expenditures for services or activities which are not essential to immediate job seeking, such as longer range remedial care and services, training or psychological counseling.

**§ 240.64 Fiscal recordkeeping requirements.**

To support claims for FFP, States shall identify all participants in their employment search program, the activities in which each individual par-

ticipates, and any services or direct payments for expenses provided to individual participants. The reporting or recordkeeping provisions for Employment Search have been assigned OMB No. 0960-0319.

## Appendix C

### MINNESOTA CWEP STATUTE

Minnesota Statutes, section 256.737, as amended, effective August 1, 1985:

#### **256.737 COMMUNITY WORK EXPERIENCE PROGRAM.**

**Subdivision 1. Pilot programs.** In order that persons receiving aid under this chapter may be assisted in achieving self-sufficiency by enhancing their employability through meaningful work experience and training and the development of job search skills, the commissioner of human services may continue the pilot community work experience demonstration programs that were approved by January 1, 1984. No new pilot community work experience demonstration programs may be established under this subdivision. The commissioner shall: (a) assist counties in the design, implementation, and evaluation of these demonstration programs; (b) promulgate, in accordance with chapter 14, emergency rules necessary for the implementation of this section, except that the time restrictions of section 14.35 shall not apply and the rules may be in effect until the termination of the demonstration programs; and (c) seek any federal waivers necessary for proper implementation of this section in accordance with federal law. The commissioner shall prohibit use of participants in the programs to do work that was part or all of the duties or responsibilities of an authorized public employee position established as of January 1, 1985. The exclusive bargaining representative shall be notified no less than 14 days in advance of any placement by the community work experience program. Concurrence with respect to job duties of persons placed under the community work experience program shall be obtained from the appropriate exclusive bargaining representative. The appropriate oversight committee shall be given monthly lists of all job placements under a community work experience program.

Projects end no later than June 30, 1987, and a report shall be made to the legislature by February 15, 1987, on the feasibility of permanent implementation and on the cost effectiveness of each of the demonstration programs.

**Subd. 2. Additional programs.** In addition to the pilot programs established in subdivision 1, the commissioner may approve the application of up to eight additional counties to enter into a community work experience program. The programs under this subdivision are governed by subdivision 1 except as in paragraphs (a) and (b).

(a) As a condition to placing a person receiving aid to families with dependent children in a program under this subdivision, the county shall first provide the recipient the opportunity to participate in the following services:

- (1) placement in suitable subsidized or unsubsidized employment; or
- (2) basic educational or vocational or occupational training for an identifiable job opportunity.

(b) If the recipient refuses suitable employment and a training program, the county may require the recipient to participate in a community work experience program as a condition of eligibility.

**History:** 1983 c 249 s 1; 1984 c 640 s 32; 1984 c 654 art 5 s 22,58; 1Sp1985 c 9 art 2 s 30; 1Sp1985 c 14 art 9 s 23



**Appendix D**  
**MINNESOTA CWEP RULES**

Minnesota Rules, parts 9505.1050 - 9505.1065 (Emergency), effective October 29, 1984:

1 9505.1050 [Emergency] DEFINITIONS.

2 Subpart 1. Scope. The terms used in parts 9505.1050 to  
3 9505.1065 [Emergency] have the meanings given them in this part.

4 Subp. 2. Aid to Families with Dependent  
5 Children-Unemployed Parent or AFDC-UP. "Aid to Families with  
6 Dependent Children-Unemployed Parent" or "AFDC-UP" means aid to  
7 families with dependent children where the principal wage earner  
8 is unemployed.

9 Subp. 3. Applicant. "Applicant" means a person who has  
10 filed an application for AFDC-UP with the local agency.

11 Subp. 4. Commissioner. "Commissioner" means the  
12 commissioner of human services or a designee.

13 Subp. 5. Community work experience program or  
14 CWEP. "Community work experience program" or "CWEP" means the  
15 pilot demonstration program authorized under Minnesota Statutes,  
16 section 256.737.

17 Subp. 6. Department. "Department" means the Department of  
18 Human Services.

19 Subp. 7. Displacement. "Displacement" means CWEP  
20 participants doing work that was part or all of the duties or  
21 responsibilities of an authorized public employee position  
22 established as of January 1, 1983, as defined in Minnesota  
23 Statutes, section 256.737 and Code of Federal Regulations, title  
24 45, section 238.01.

25 Subp. 8. Job placement. "Job placement" means placement  
26 of a participant in a job which is not subsidized by private or  
27 public funds.

28 Subp. 9. Local agency. "Local agency" means the agency  
29 authorized by the county board or human service board to provide  
30 social and financial services.

31 Subp. 10. Mandatory participant. "Mandatory participant"  
32 means an individual receiving AFDC-UP who is required to  
33 participate in CWEP as a condition of AFDC-UP eligibility.

34 Subp. 11. Participant. "Participant" means recipient for  
35 whom participation in CWEP is mandatory or a recipient who has  
36 volunteered to participate in CWEP.

1 Subp. 12. Recipient. "Recipient" means a person who is  
2 currently receiving assistance under the AFDC-UP program.

3 Subp. 13. Registrant. "Registrant" means an AFDC-UP  
4 applicant or recipient who has registered with the WIN program  
5 at the job service agency.

6 Subp. 14. Sponsor. "Sponsor" means an organization,  
7 group, or agency designated by the commissioner to operate a  
8 CWEP project. Only public agencies or nonprofit groups and  
9 organizations may be sponsors.

10 Subp. 15. Volunteer. "Volunteer" means an AFDC-UP  
11 recipient whose participation in CWEP is not mandatory, but who  
12 chooses to participate and is accepted into the program.

13 Subp. 16. Work Incentive Program or WIN. "Work Incentive  
14 Program" or "WIN" means the work incentive program established  
15 in Code of Federal Regulations, title 45, section 224 which  
16 requires participation in WIN by qualified recipients of AFDC-UP.

17 Subp. 17. Worksite. "Worksite" means the place the CWEP  
18 participant is assigned to gain work experience.

19 MS s 256.737

20 9 SR 1203

21 9505.1051 [Emergency] APPLICABILITY.

22 Parts 9505.1050 to 9505.1065 [Emergency] establish the  
23 rights and responsibilities of the Department of Human Services,  
24 local agencies, oversight committees, and recipients of AFDC-UP  
25 concerning registration, eligibility, worksites, and sanctions  
26 for CWEP.

27 MS s 256.737

28 9 SR 1203

29 9505.1052 [Emergency] PURPOSE OF CWEP.

30 The purpose of CWEP is to provide work experience and  
31 training for AFDC-UP recipients.

32 MS s 256.737

33 9 SR 1203

34 9505.1053 [Emergency] COUNTIES ELIGIBLE FOR CWEP.

35 Subpart 1. Eligible counties. Only those counties that

1 were approved by January 1, 1984, may operate a CWEP program.  
2 Subp. 2. Plan proposal. Each county that has an approved  
3 CWEP program as of January 1, 1984, must submit a written plan  
4 complying with this part to the commissioner before operation of  
5 the program can begin. Counties in which a CWEP program is in  
6 operation as of the effective date of parts 9505.1050 to  
7 9505.1065 [Emergency] shall submit a written plan in compliance  
8 with this part by December 1, 1984.

9 Subp. 3. Plan content. The plan shall include:  
10 A. the number of recipients expected to participate;  
11 B. the sponsor;  
12 C. a description of the potential worksites to be  
13 used and the types of positions to be used;  
14 D. a description of the evaluation standards the  
15 county will use; and  
16 E. a statement that the county will use an oversight  
17 committee.

18 Subp. 4. Plan approval. The commissioner shall approve  
19 the plan if it fulfills the purpose and requirements of law and  
20 parts 9505.1050 to 9505.1065 [Emergency.]

21 Subp. 5. Plan amendment. An amendment to a county plan  
22 must be approved by the commissioner following the same criteria  
23 as submittal of the plan.

24 Subp. 6. County evaluation. Twice a year by June 30 and  
25 December 31, each county must submit a report to the  
26 commissioner which includes:

27 A. the number of recipients that participated;  
28 B. program and administrative costs; and  
29 C. the results achieved.

30 Subp. 7. Termination of CWEP program. Either the county  
31 or the department may terminate the CWEP program upon 30 days'  
32 written notice to the other.

33 MS s 256.737

34 9 SR 1203

35 9505.1054 [Emergency] RECIPIENTS REQUIRED TO PARTICIPATE IN CWEP.

36 Subpart 1. General criteria. Only recipients and not

1 applicants may be required to participate in CWEP. Participants  
2 in CWEP continue to receive regular AFDC-UP grants.  
3 Participants are neither paid by, nor considered employees of,  
4 the worksites to which they are assigned.

5 Subp. 2. Determining mandatory participation. Mandatory  
6 participation is required of those AFDC-UP recipients who are  
7 required to register for WIN and are not exempt under this part.

8 Subp. 3. Exemptions from mandatory participation. Each  
9 AFDC-UP recipient must participate in CWEP unless the recipient:

10 A. meets the exemption criteria under Code of Federal  
11 Regulations, title 45, section 238.14(a), as amended through  
12 December 31, 1983; or

13 B. is 60 years of age or older; or

14 C. lives more than two hours round trip travel time  
15 from the worksite, or transportation is unavailable; or

16 D. is a caretaker of a child under seven; or

17 E. receives social services and the local agency  
18 social worker recommends that the recipient be exempt from CWEP  
19 participation; or

20 F. is in a rehabilitation program approved by the  
21 local agency; or

22 G. is in need of day care which is unavailable; or

23 H. is in a program or technical school which is full  
24 time; or

25 I. is participating in another work program.

26 Subp. 4. Disagreement with exemption determination. Any  
27 disagreement by a recipient with a local agency's determination  
28 of exemption is governed by the notice and hearing procedures in  
29 Minnesota Statutes, section 256.045, and Code of Federal  
30 Regulations, title 45, section 205.10.

31 Subp. 5. Voluntary participation in CWEP. A county shall  
32 provide for voluntary participation in CWEP by any AFDC-UP  
33 recipient who is not in the mandatory participant group.

34 Sanctions for noncooperation with CWEP do not apply to  
35 volunteers.

36 Subp. 6. Assistance unit. Where more than one member of

1 an assistance unit meets the criteria for mandatory  
2 participation in CWEP, only the qualifying adult member of the  
3 unit will be required to participate.

4 MS s 256.737

5 9 SR 1203

6 9505.1055 [Emergency] PARTICIPATION REQUIREMENTS.

7 Subpart 1. Type of work. Work may be temporary,  
8 permanent, full time, part time, or seasonal as long as it does  
9 not exceed the monthly and yearly limits of this part.

10 Subp. 2. Limit on hours worked per month. The local  
11 agency shall determine the number of hours per month each  
12 participant is required to participate in CWEP. No participant  
13 shall be required to work for more hours in any given month than  
14 the number of hours which would result from dividing the  
15 family's AFDC-UP grant amount by the greater of either: the  
16 Minnesota minimum wage or the federal minimum wage; or the  
17 prevailing wage area rate established for starting workers in  
18 like occupation or industry, whichever the local agency  
19 chooses. If there is a subsequent adjustment to an AFDC-UP  
20 grant to correct an overpayment or an underpayment, the local  
21 agency shall adjust the number of hours required to be worked in  
22 a month in the next full month following the adjustment.

23 Subp. 3. Limit on months worked. No participant shall be  
24 required to work on a worksite for more than six months in any  
25 12-month period. Any participation on a worksite for more than  
26 six months in any 12-month period is voluntary.

27 Subp. 4. Job placement. Job placement will have priority  
28 over other CWEP activities.

29 Subp. 5. Participation in more than one program. A  
30 participant who is required to participate in more than one of  
31 the programs identified in parts 9505.1050 to 9505.1065  
32 [Emergency] will not be denied AFDC-UP assistance for failure to  
33 participate in one of the programs if that individual is an  
34 active and satisfactory participant in another program.

35 Subp. 6. WIN requirements must be met. In WIN counties  
36 applicants shall first be required to register with WIN and must

1 have unsuccessfully searched for a job for two weeks before  
2 referral to CWEP.

3 MS s 256.737

4 9 SR 1203

5 9505.1056 (Emergency) PARTICIPANT PROTECTION.

6 Local agencies must provide workers' compensation coverage  
7 to participants. The cost of workers' compensation is an  
8 administrative cost which is reimbursable on the same basis as  
9 other administrative costs.

10 MS s 256.737

11 9 SR 1203

12 9505.1057 (Emergency) PARTICIPANT REIMBURSEMENT.

13 Subpart 1. Local agency reimbursement of transportation  
14 and day care. Participants may not be required to use their  
15 assistance or their income or resources to pay participation  
16 costs.

17 Participants shall be reimbursed by the local agency for  
18 reasonable, necessary, and cost-effective transportation and day  
19 care services. Reimbursement for day care services may not  
20 exceed \$160 per month per child. The costs of transportation  
21 and day care are administrative costs which are reimbursable on  
22 the same basis as other administrative costs.

23 Subp. 2. Local agency reimbursement of other participant  
24 costs. Participants shall also be reimbursed by the local  
25 agency for necessary costs directly related to participation in  
26 CWEP within the limits of subparts 3 and 4. These costs include  
27 but are not limited to:

- 28 A. social services;
- 29 B. employment related remedial medical care;
- 30 C. employment related medical exams;
- 31 D. vocational rehabilitation services;
- 32 E. homemaker services;
- 33 F. financial management aid;
- 34 G. incentive allowances;
- 35 H. training related expenses;

1 I. nonrecurring auto repair and auto insurance  
 2 expenses;

3 J. payments for special work clothing, shoes, or  
 4 boots which are required for the recipient to participate in a  
 5 CWEP assignment;

6 K. protective devices such as safety glasses, gloves,  
 7 and helmets; and

8 L. employment fees.

9 Subp. 3. Amount of participant cost reimbursement. The  
 10 local agency shall reimburse each CWEP participant for costs  
 11 within the scope of subpart 2 not to exceed \$25 per month per  
 12 participant. If it is determined that the cost of the items  
 13 listed in subpart 2, items A to L exceed \$25 per month per  
 14 participant, the local agency shall either choose to reimburse  
 15 for such costs in excess of \$25 per month per participant or  
 16 find that the recipient has good cause not to participate in the  
 17 CWEP program.

18 Subp. 4. Federal reimbursement of local agency. Federal  
 19 reimbursement will be made in the following ways:

20 A. In non-WIN counties the local agency will receive  
 21 federal reimbursement for costs within the scope of subpart 2 in  
 22 an amount equal to the reimbursement level under United States  
 23 Code, title 42, section 601 et seq., which shall not exceed \$25  
 24 per month per participant.

25 B. In WIN counties the local agency will receive  
 26 federal reimbursement for costs within the scope of subpart 2 in  
 27 an amount equal to the reimbursement level under United States  
 28 Code, title 42, section 601 et seq., and, in addition, 90  
 29 percent of those costs in excess of \$25 per month per  
 30 participant.

31 C. The local agency will receive federal  
 32 reimbursement for administrative costs of the program in an  
 33 amount equal to the reimbursement level under United States  
 34 Code, title 42, section 601 et seq.

35 MS s 256.737

36 § SR 1203

1 9505.1058 [Emergency] GOOD CAUSE.

2 The local agency shall determine whether there is good  
3 cause for a participant to refuse to accept an available  
4 assignment or to refuse to cooperate with the conditions of an  
5 assignment. A determination or recommendation by the Department  
6 of Economic Security is not binding on the local agency. In  
7 addition to part 9505.1057 [Emergency], subpart 3, situations in  
8 which good cause exists include:

9 A. The recipient meets the exemption conditions in  
10 part 9505.1054 [Emergency], subpart 3.

11 B. The worksite participation adversely affects the  
12 recipient's physical or mental health as verified by a  
13 physician, licensed or certified psychologist, physical  
14 therapist, vocational expert, or by other sound medical evidence.

15 C. The recipient does not possess the skill or  
16 knowledge required for the work.

17 D. The CWEP assignment does not comply with the terms  
18 of the participant's employability plan as defined in Code of  
19 Federal Regulations, title 45, section 224.22(a).

20 MS s 256.737

21 9 SR 1203

22 9505.1059 [Emergency] RESTRICTIONS ON TYPE OF WORK DONE BY  
23 PARTICIPANTS.

24 Work performed by participants in CWEP must comply with  
25 Code of Federal Regulations, title 45, section 238.52 and  
26 Minnesota Statutes, section 256.737.

27 MS s 256.737

28 9 SR 1203

29 9505.1060 [Emergency] PROHIBITIONS AGAINST DISPLACEMENT.

30 Subpart 1. Displacement prohibited. Local agencies shall  
31 not assign participants where such assignments displace  
32 authorized public employee positions established as of January  
33 1, 1983. This prohibition extends to positions which were  
34 established, but vacant as of January 1, 1983. CWEP  
35 participants may perform the same tasks as performed by regular

1 employees so long as the January 1, 1983, prohibition is not  
2 violated.

3 Subp. 2. Action to be taken. The local agency shall send  
4 written notification to the exclusive bargaining representative  
5 of the union covering the work the CWEP participant will do on  
6 the worksite at least 15 days before a CWEP participant is  
7 assigned to a worksite. The exclusive bargaining representative  
8 must concur with the job duties of the CWEP participant's  
9 worksite assignment within 15 days of notification of the  
10 proposed assignment. If concurrence is not received within 15  
11 days, it shall be presumed that the exclusive bargaining  
12 representative has concurred in the worksite assignment.

13 Subp. 3. Notification to oversight committee. The local  
14 agency shall submit a monthly list to each oversight committee  
15 containing all worksite assignments and job placements for that  
16 county.

17 MS s 256.737

18 9 SR 1203

19 3505.1061 [Emergency] SANCTIONS AND APPEALS.

20 Subpart 1. Sanctions. When the local agency determines  
21 that a mandatory CWEP participant has failed or refused without  
22 good cause to participate in CWEP, the following sanctions shall  
23 apply:

24 A. For the first occurrence the entire assistance  
25 unit shall not receive assistance for three payment months.

26 B. For the second and subsequent occurrences, the  
27 entire assistance unit shall not receive assistance for six  
28 payment months.

29 Subp. 2. Appeals. Each participant shall have the right  
30 to appeal any determination, action, or inaction on the part of  
31 the local agency relating to their participation in CWEP  
32 according to the welfare hearing procedures in Minnesota  
33 Statutes, section 256.045.

34 MS s 256.737

35 9 SR 1203

1 9505.1062 [Emergency] SPONSORS.

2 Subpart 1. Sponsor. The commissioner may approve the  
3 operation of more than one project by a single sponsor. The  
4 sponsor may use only public agencies and nonprofit organizations  
5 for worksites, but no state hospital shall be used for worksites.

6 Subp. 2. Duties of sponsor. The duties of a sponsor are  
7 to:

8 A. Assist CWEP participants in a job search before  
9 they are assigned to a worksite. The job search must be  
10 conducted for at least three days. The job search assistance  
11 period is in addition to any other job search the participant  
12 might have done before CWEP.

13 B. Allow the CWEP participant at least one business  
14 day per week to search for work. This day may, at local agency  
15 option, count as eight hours of authorized CWEP work.

16 C. Select a convenor, cooperate with the oversight  
17 committee, use the forms the department designs for CWEP, and  
18 provide other data requested by the department.

19 MS s 256.737

20 9 SR 1203

21 9505.1063 [Emergency] CONVENOR.

22 Subpart 1. Definition. For the purposes of parts  
23 9505.1050 to 9505.1065 [Emergency], "convenor" means a person  
24 selected by the sponsor from a CWEP project area.

25 Subp. 2. Convenor duties. The convenor's duties shall  
26 include contacting representatives of the interest groups listed  
27 in items A to F in order to solicit approval of submission of  
28 their names to the commissioner as potential members of the  
29 oversight committee. The convenor shall chair the first  
30 oversight committee meeting, and shall ensure that a permanent  
31 chairperson is elected at the first meeting of the oversight  
32 committee. The list of names submitted to the commissioner must  
33 include at least one representative of each of the following  
34 interest groups:

35 A. AFDC-UP recipients;

36 B. women's groups;

- 1 C. public employee unions;
- 2 D. legal services representatives;
- 3 E. members of the business community; and
- 4 F. the general public with specific effort to include
- 5 minority group representatives.

6 The people listed must live in the county served by their  
7 CWEP project. The only exception to this requirement is  
8 representatives of legal services.

9 MS s 256.737

10 9 SR 1203

11 9505.1064 [Emergency] OVERSIGHT COMMITTEE.

12 Subpart 1. Appointment. The commissioner shall appoint an  
13 oversight committee for each project which will consist of six  
14 or more members. Every effort will be made to include at least  
15 one member from each of the interest groups listed in part  
16 9505.1063 [Emergency], subpart 2. The list of potential members  
17 submitted by the convenor shall serve as a guide to the  
18 commissioner. The commissioner may ask the convenor or the  
19 local agency for additional names. The commissioner may appoint  
20 persons not included on the lists.

21 Subp. 2. Duties. The duties of the oversight committee  
22 are to:

- 23 A. meet quarterly;
- 24 B. provide informal, nonbinding conciliation hearings  
25 for aggrieved CWEP participants to resolve conflicts before  
26 resorting to welfare hearing procedures;
- 27 C. provide a forum for CWEP participants and the  
28 public to voice concerns;
- 29 D. review evaluations of the program made by the  
30 department and make recommendations to the commissioner;
- 31 E. make the names of committee members available to  
32 CWEP participants; and
- 33 F. visit worksites to inquire about complaints.

34 Subp. 3. Hearing procedures. This part shall not take  
35 precedence over the welfare fair hearing procedures of Minnesota  
36 Statutes, section 256.045.

1 MS s 256.737

2 9 SR 1203

3 9505.1065 [Emergency] CLASSIFICATION OF DATA ON PARTICIPANTS.

4 The oversight committee is a member of the human service  
5 system and shall comply with Minnesota Statutes, section 13.46.

6 MS s 256.737

7 9 SR 1203



## Appendix E

### CWEP PARTICIPANT QUESTIONNAIRE

### CWEP PARTICIPANT QUESTIONNAIRE

The Minnesota Department of Human Services is writing a report on the Community Work Experience Program (CWEP). The State Legislature will use this report to decide whether to continue the program. For this report, we would like to know what you and others think about CWEP.

We will appreciate it if you fill out this questionnaire at this time and then mail it back to us in the stamped, addressed envelope you have been given. You will be given enough time to finish the questions, and this time will count as CWEP work time.

NO ONE WILL KNOW HOW YOU ANSWER THE QUESTIONS, BECAUSE THERE IS NOTHING ON THIS QUESTIONNAIRE TO SHOW WHO IS FILLING IT OUT.

Please try to answer all of the questions.

Thank you for your help.

CWEP PARTICIPANT QUESTIONNAIRE

County: \_\_\_\_\_ Month and Year: \_\_\_\_\_

1. What is your age? \_\_\_\_\_
2. Sex? \_\_\_\_\_ Male \_\_\_\_\_ Female
3. a. What was your level of education when you started in CWEP? (Do not count trade school, vocational-technical school, or an apprenticeship program.)

\_\_\_\_\_ No high-school diploma and no GED  
\_\_\_\_\_ High-school diploma or GED, no college  
\_\_\_\_\_ Some college  
\_\_\_\_\_ College degree

- b. Did you ever complete a program at a trade school or vocational-technical school, or an apprenticeship program, before you were in CWEP?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If so, what type of work was the program for? \_\_\_\_\_  
\_\_\_\_\_

4. Please fill in the following information about the longest job you ever had before you were in CWEP:

Type of work: \_\_\_\_\_

Highest wage: \$ \_\_\_\_\_ per \_\_\_\_\_

Average number of hours per week: \_\_\_\_\_

How long did you have this job? \_\_\_\_\_ years, \_\_\_\_\_ months

5. a. At the present time, is your work in CWEP required or voluntary?

\_\_\_\_\_ Required \_\_\_\_\_ Voluntary

- b. How many hours per month are you now working in CWEP?

\_\_\_\_\_ hours per month

- c. What type of work are you doing in CWEP? \_\_\_\_\_  
\_\_\_\_\_

d. What type of worksite are you working at? \_\_\_\_\_  
\_\_\_\_\_

6. a. Do you like or dislike your work at your CWEP worksite(s) (the work itself)?

- \_\_\_\_\_ I like it very much.
- \_\_\_\_\_ I like it somewhat.
- \_\_\_\_\_ I do not really like or dislike it.
- \_\_\_\_\_ I dislike it somewhat.
- \_\_\_\_\_ I dislike it very much.

Why? \_\_\_\_\_  
\_\_\_\_\_

b. Do you get satisfaction from your work at your CWEP worksite(s) (from the work itself)?

- \_\_\_\_\_ Yes, very much
- \_\_\_\_\_ Yes, some
- \_\_\_\_\_ No, none

Why? \_\_\_\_\_  
\_\_\_\_\_

7. a. Has your worksite supervisor(s) treated you with respect or disrespect?

- \_\_\_\_\_ Always with respect
- \_\_\_\_\_ With respect most of the time
- \_\_\_\_\_ With respect about as often as disrespect
- \_\_\_\_\_ With disrespect most of the time
- \_\_\_\_\_ Always with disrespect

What makes you say so? \_\_\_\_\_  
\_\_\_\_\_

b. Has your worksite supervisor(s) treated you fairly or unfairly?

- \_\_\_\_\_ Always fairly
- \_\_\_\_\_ Fairly most of the time
- \_\_\_\_\_ Fairly about as often as unfairly
- \_\_\_\_\_ Unfairly most of the time
- \_\_\_\_\_ Always unfairly

What makes you say so? \_\_\_\_\_  
\_\_\_\_\_

c. What else has your worksite supervisor(s) done that you have either liked or disliked?

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8. a. Are there any regular employees, besides your supervisor, at your CWEP worksite(s)?

Yes  No

b. If so, have they ever treated you with disrespect because you are on welfare?

- No, never
- Yes, but only once or a few times
- Yes, often
- Yes, most of the time
- Yes, always

What makes you say so? \_\_\_\_\_  
\_\_\_\_\_

9. a. Have you learned any new skills from your work at your CWEP worksite(s)?

Yes  No

b. If so, do you think any of these skills is useful for getting a regular job?

Yes  No  Not sure

c. Please write down each new skill you have learned from your work at your CWEP worksite(s) and indicate if you think each one is useful for getting a regular job:

New skills:

Useful for getting  
a regular job?

a. \_\_\_\_\_

\_\_\_\_\_  Yes  No  Not sure

b. \_\_\_\_\_

\_\_\_\_\_  Yes  No  Not sure

c. \_\_\_\_\_

\_\_\_\_\_  Yes  No  Not sure

10. a. Has your work at your CWEP worksite(s) done anything else that might help you get a regular job?

Yes     No     Not sure

b. If so, what?

- It has given me more of a work history with references.
- It has given me job leads or job contacts.
- It has given me more self-confidence.
- It has given me more motivation to find a regular job.
- It has improved or kept up my work habits.
- Other (please indicate):

\_\_\_\_\_

\_\_\_\_\_

c. If not, why not? \_\_\_\_\_

\_\_\_\_\_

11. Has your work at your CWEP worksite(s) kept you from looking for a regular job as much as you would like?

Yes     No

12. a. Have you paid any costs for CWEP, other than for meals?

Yes     No

b. If so, have you been paid back for all of these costs?

Yes     No

c. Please fill in the following information for any CWEP costs for which you have not been fully paid back:

<u>Type of cost</u>	<u>Monthly amount of cost for CWEP</u>	<u>Monthly amount paid to you for this cost</u>
a. _____		
_____	\$ _____	\$ _____
b. _____		
_____	\$ _____	\$ _____
c. _____		
_____	\$ _____	\$ _____

13. Has your work at your CWEP worksite(s) made being on welfare a better or worse situation for you?

- Much better
- Somewhat better
- No better or worse
- Somewhat worse
- Much worse

Why? \_\_\_\_\_  
\_\_\_\_\_

14. Has your work at your CWEP worksite(s) made you respect yourself any more or less?

- Much more
- Somewhat more
- No more or less
- Somewhat less
- Much less

Why? \_\_\_\_\_  
\_\_\_\_\_

15. Has your work at your CWEP worksite(s) made your family and friends respect you any more or less?

- Much more
- Somewhat more
- No more or less
- Somewhat less
- Much less
- Not sure

Why do you think so? \_\_\_\_\_  
\_\_\_\_\_

16. Has working at your CWEP worksite(s) made your home life any better or worse?

- Much better
- Somewhat better
- No better or worse
- Somewhat worse
- Much worse

How? \_\_\_\_\_  
\_\_\_\_\_

17. What else about your CWEP work experience have you either liked or disliked?

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18. Overall, do you think that working at your CWEP worksite(s) has been good or bad for you?

- Very good
- Fairly good
- Neutral; as much good as bad
- Fairly bad
- Very bad

19. Do you think you will stay on welfare a longer time or a shorter time because of working at your CWEP worksite(s)?

- A longer time
- No longer or shorter a time
- A shorter time
- Not sure

Why? 

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20. What changes do you think should be made in CWEP to make it a better program?

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21. Do you think welfare recipients should be required to work in return for their welfare benefits if they are able to work?

- Yes       No       Not sure

Why? 

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## NOTES

1. Social Security Act as amended, Title IV-A, section 409.
2. Minnesota Department of Human Services, Work and Training Unit, "The Community Work Experience Program in Minnesota: Second Report to the Legislature," February 15, 1985.
3. Social Security Act as amended, Title IV-A, section 409.
4. See Code of Federal Regulations, Title 45, section 224.20.
5. An AFDC unemployed parent is the principal earner in a two-parent family receiving AFDC on the basis of unemployment of the principal earner.
6. Minnesota Department of Public Welfare, "Community Work Experience Program: Preliminary Report to the Legislature," March 1, 1984, and second CWEP report to the legislature (see note 2).
7. See Code of Federal Regulations, Title 45, section 238.14 (Appendix A) and Minnesota Rules, part 9505.1054 (Emergency), subpart 3 (Appendix D).
8. See Minn. Stat. section 256.737 (Appendix C).
9. Second CWEP report to the legislature (see note 2), Chapter 3, section I. The "job search" category used in the earlier report was less inclusive than the "assisted job search" category in this report, in that in some counties it excluded career planning activities such as skill and interest assessment. Individuals who participated only in such activities were not counted in the "job search" category in the previous report, but are counted in the "assisted job search" category in this report.
10. In Blue Earth County, the number who began work assignments exceeded the number participating in assisted job search because some who began work assignments during the report period had participated in assisted job search during the previous period.
11. Minn. Stat. section 256.737 (Appendix C).
12. This situation will become less severe in future reports as the length of time of program operation increases relative to average AFDC case length for participants.
13. Although Federal approval of Minnesota's ESP plan occurred in summer, 1986, the allowability of ESP costs for Federal reimbursement was retroactive to April 1, 1986.
14. Second CWEP report to the legislature (see note 2), Chapter 3, section IV.

15. The margin of random error ("sampling error") is at most 12.9 percentage points with 95% probability.
16. Second CWEP report to the legislature (see note 2), Chapter 4, section I. The current results are somewhat more favorable toward CWEP than the earlier results, but no significance should be attached to this because of low response rates and sampling error.
17. See Table 12, item 19, but note the qualifying discussion in the accompanying text (Chap. 4, sec. I).
18. Blue Earth, Dodge, and Otter Tail Counties were not considered because of substantial periods during which their programs did not operate. (In Otter Tail County, the period when the program was not operating was before the period for which data are presented in this report.) The necessary case data were not available from the DHS Case Information file because only certain summary data in this file are retained beyond two years after a case closing. Therefore, counties were approached for these data. A major problem was that the counties also dispose of information after a certain period of time (with a minimum of four years by law). Since the programs in Itasca and Winona Counties began in spring, 1983, and since data were needed going back to two years before the start of the program, it was not possible, with either of these counties, to obtain the necessary data from both the CWEP county and at least one adjacent or nearby county for control purposes. This was possible, however, with Morrison and Todd Counties because their programs began in November, 1984. It would have been desirable to include Crow Wing and Mille Lacs Counties (non-Indian cases only) as control counties (along with Douglas and Wadena), but they could not provide the necessary data.
19. Unfortunately, the time span for which data were available did not permit a longer observation period for this variable. However, since nonexempt individuals in Morrison and Todd Counties are referred to the program within a month of their case opening, it seems likely that in most cases where the program affects the amount of time on AFDC, the effect should occur within 12 months of the case opening. This is supported by the fact that for Morrison and Todd Counties, the value of the DURATION variable was less than 12 in 84% of all cases.
20. An obvious candidate for an alternative is the unemployment rate. However, the only available unemployment-rate figure for counties is constructed (by the Minnesota Department of Jobs and Training) from estimates of the labor force and of the unemployed population, and these estimates are widely acknowledged to be subject to substantial error because of data limitations.