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MINNESOTA DEPARTMENT OF HUMAN SERVICES  
WORK AND TRAINING UNIT

THE COMMUNITY WORK EXPERIENCE PROGRAM  
IN MINNESOTA:  
SECOND REPORT TO THE LEGISLATURE

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FEBRUARY 15, 1985

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IN MINNESOTA:

SECOND REPORT TO THE LEGISLATURE

Minnesota Department of Human Services

Work and Training Unit

February 15, 1985

## EXECUTIVE SUMMARY

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

The Federal Omnibus Budget Reconciliation Act of 1981 permitted states to run CWEPs "to provide work experience and training" to AFDC recipients. In a 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 state may also allow voluntary participation by any other AFDC recipient group. 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 costs. Federal reimbursement is available at 50%, under the AFDC administrative-match formula, for administrative expenses and for participant reimbursement within limits, but not for supervision of participants or for materials or equipment for their work.

Since spring 1983, eight Minnesota counties have operated CWEPs; seven now do. The programs have consisted, at minimum, of an orientation, assisted job search, and work assignment. Under state provisions, the current programs require participation by AFDC unemployed parents (UPs) not meeting certain exemption criteria, and allow for voluntary participation by other UPs. The assisted job search, not Federally mandated, reflects an emphasis on helping participants find employment. The work assignment is intended to provide work experience, teach job skills, and maintain or improve work habits as participants perform a service to the community. Each county determines the monthly amount of work required of nonexempt participants, not to exceed what results from dividing the AFDC grant by the county's choice of the minimum wage or the prevailing area wage for similar work.

Over April 1, 1983 - September 30, 1984, 827 individuals completed CWEP orientation, 492 began assisted job search, and 406 began work assignments. Itasca County accounted for about two thirds of those beginning job search and work assignments. Participants were predominantly male UPs. The most common worksites were street and highway departments, schools, and parks and other natural resource areas; the work most often done was maintenance of streets, highways, buildings, and grounds. However, participants did several other types of work -- for example, as teachers' aides, clerical assistants, and carpenters.

CWEP cost a total of \$253,850 over April 1, 1983 - September 30, 1984. Eighty-eight percent of this amount was in categories qualifying for 50% Federal reimbursement, and thus 44% was fully reimbursable. The cost per participant over on a work assignment

averaged \$625 but varied widely across counties. Using such a figure to predict the cost of an expanded CWEP would be problematic because of difficulties in predicting the number of participants and because, for several reasons, the cost per participant could differ from what it has been in the eight CWEP counties.

Current and former CWEP participants responding to a survey (76% of whom were from Itasca County) indicated the following: 66% were treated with respect, and 87% were treated fairly, by their work supervisors; 23% learned skills they considered useful for finding a job; 32% were prevented by their CWEP work from searching for employment as much as otherwise; 27% were not reimbursed for all participation costs; 47% felt better about being on welfare, and 26% felt worse, because of their CWEP work; finally, 58% replied yes, and 25% no, when asked if welfare recipients should be required to work, if able, for their benefits.

CWEP administrators indicated that the program has helped prepare some participants to find employment through such factors as new job skills, a current work history, better work attitudes and habits, and improved job-search skills. They also said it fails to help many others because it is unequipped to deal with such problems as inability to read or write, inadequate social skills, and depression.

The effect of CWEP on the ability of participants to find employment, though important, is unknown because of inadequate data. In six CWEP counties, 11% of those completing orientation over April 1, 1983 - September 30, 1984 experienced case closures classified as due to increased employment or earnings not attributable to a recall by a former employer. This figure, however, may overstate or understate the proportion of CWEP participants experiencing increased employment or earnings because of participating in the program.

The value of work done by participants in six counties over April 1, 1983 - September 30, 1984 was crudely estimated at \$300,000 by multiplying the number of hours of work by the minimum wage of \$3.35. This could be more or less than the actual value of the work (the actual value being what the public would be willing to pay); however, it exceeds the total program cost of \$233,000 for the same counties over the same period.

While it is widely believed that mandatory work for welfare recipients reduces caseload, a statistical analysis failed to produce evidence that CWEP had affected the AFDC-UP caseload in any county where it has operated.

In keeping with the legislative mandate, this report provides information "on the feasibility of permanent implementation and on the cost effectiveness of each of the [county CWEP] demonstration programs." Itasca County has demonstrated that CWEP is feasible on a large scale and the other CWEP counties have shown that it is feasible on a smaller scale. However, to determine feasibility in

other localities, several factors must be considered, such as labor market conditions, availability of worksites, and proximity of worksites to participants.

Whether CWEP is cost effective is less clear. While the value of work performed was estimated to exceed total program cost in six counties in the manner previously indicated, it is uncertain what the public would be willing to pay for such work. Finally, whether CWEP affects caseload size remains unknown.

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## Chapter 1

### INTRODUCTION

#### I. NATURE AND PURPOSE OF REPORT

This report is an analysis of the Community Work Experience Program (CWEP) in Minnesota, prepared in compliance with Minnesota Statutes section 256.737 [Community Work Experience Program] as amended April 19, 1984. This law, which appears in Appendix A, states, in part, that "a preliminary report shall be made to the legislature by February 15, 1985 on the feasibility of permanent implementation [of CWEP] and on the cost effectiveness of each of the [county CWEP] demonstration programs."

#### II. BACKGROUND

The Federal Omnibus Budget Reconciliation Act of 1981, Public Law 97-35, permitted states to operate Community Work Experience Programs. The stated purpose of these programs is "to provide work experience and training" to AFDC recipients. In a 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 Federally mandated exemption criteria essentially the same as in the Work Incentive Program (WIN). 1 The work performed must be in public agencies or private nonprofit organizations, and must not displace employees or fill established vacancies. The state determines the monthly number of hours of work required of the mandatory group, not to exceed what results from dividing the monthly grant by the Federal or state minimum wage, whichever is greater. 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, to ensure that placement of participants into regular jobs "has priority." The program may operate in whatever areas the state chooses. These and other provisions are set forth in Code of Federal Regulations, title 45, part 238, as amended October 1, 1984 (see Appendix B).

A report by the U.S. General Accounting Office 2 indicates that

sixteen states were operating CWEPs of varying descriptions on February 1, 1983. In eight states the programs included activities in addition to work, such as job search, classroom training, and peer-support sessions. Thirteen states followed one or more procedures that reduced the time participants worked relative to the amount resulting from dividing the AFDC grant by the applicable minimum wage; thus, in only three states did participants "work off" the entire grant at the minimum wage. Most states limited their programs geographically. Seven defined the mandatory group solely by the WIN exemption criteria; others altered these criteria. Some states, for example, extended the mandatory group to include single parents with children under six for whom child care was available, while others limited the mandatory group to AFDC unemployed parents (UPs). 13

In May 1982, the Minnesota Department of Public Welfare (DPW, now the Department of Human Services) sent to all counties a request for proposals for implementing pilot CWEPs. Nine responded. Since spring 1983, eight of these counties have operated CWEPs; seven now do. The programs have consisted, at minimum, of an orientation, assisted job search, and work assignment. Under state provisions, the seven current programs require participation by AFDC-UPs not meeting certain exemption criteria, and allow for voluntary participation by other UPs. Previously, however, three programs did not require any recipients to participate beyond orientation.

### 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 administrative structure. The provisions discussed include those regarding participation in the program and those dealing with the two major program components -- assisted job search and work assignment. Chapter 3 concerns program operation. It presents data on participants, worksites, positions in which participants worked, and operating costs; it also mentions difficulties in finding worksites and problems coming to the attention of oversight committees. Chapter 4 deals with how CWEP has affected participants. It presents views of participants as expressed in a survey, views of county CWEP administrators, and data on AFDC case closures due to increased employment and earnings among participants. Chapter 5 describes some of the work performed by CWEP participants and presents a crude estimate of its value, and also reports on a statistical analysis of the effects of CWEP on AFDC-UP caseload. Chapter 6 summarizes.

## Chapter 2

### PROGRAM PROVISIONS AND ADMINISTRATIVE STRUCTURE

This chapter describes CWEP provisions and administrative structure in Minnesota. Section I describes participation provisions. Sections II and III deal, respectively, with provisions regarding CWEP job search and work assignment. Section IV concerns miscellaneous other provisions; section V describes administrative structure. Readers desiring greater detail should consult Appendices A, B, and C, which contain, respectively, Minnesota's CWEP statute, Federal CWEP regulations, and Minnesota's CWEP rules.

#### I. PARTICIPATION PROVISIONS

The CWEPs in all eight participating counties have consisted of an orientation (30 minutes to 3 hours), assisted job search (3 days to 6 weeks), work assignment (indefinite period), and in some cases additional components. AFDC-UPs not meeting certain exemption criteria ("nonexempt UPs") have always been required to participate at least in orientation. Currently, these UPs are required to participate in all program components. In some counties and over certain periods, however, no recipients were required to participate beyond orientation. Generally, AFDC-UPs meeting the exemption criteria, and in some cases AFDC single parents, have been allowed to participate voluntarily. The Department of Human Services (DHS) limited the group of mandatory CWEP participants to UPs because of the child-care costs that would arise with large-scale participation by single parents. The group of nonexempt UPs is defined essentially by the WIN exemption criteria 4 but is further circumscribed, though only to a minor degree, by additional criteria set forth by DHS. 5

Figure 1 shows CWEP timelines depicting variation across counties and over time in whether nonexempt UPs have been required to participate in CWEP job search and work assignment. The dashed and solid lines indicate the existence of "voluntary" and "mandatory" programs, respectively. The term "voluntary program," as used throughout this report, denotes a CWEP where no one was required to participate beyond orientation; "mandatory program" means one where nonexempt UPs were required to participate in all components including job search and work assignment.

The time lines show that six counties -- Dodge, Itasca, Winona,

Figure 1

CWEP Timelines



Blue Earth 6/1/84 present

Dodge 4/1/83 8/1/83 present

Itasca 4/1/83 8/1/83 present

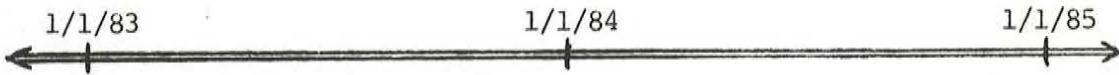
Ottertail 12/1/83 present

Winona 5/2/83 8/1/83 present

Morrison 3/16/83 6/30/84 11/1/84 present

Todd 3/1/83 8/31/84 10/15/84 present

Wadena 3/17/83 2/28/84



--- denotes existence of a voluntary CWEP.

\_\_\_\_\_ denotes existence of a mandatory CWEP.

See explanation in text.

Morrison, Todd, and Wadena -- began voluntary CWEPs in spring 1983. The programs in Dodge, Itasca, and Winona became mandatory in August 1983; those in Morrison, Todd, and Wadena remained voluntary and were eventually terminated, at least partly because of low participation rates. Morrison and Todd, however, instituted mandatory programs in fall 1984. Two other counties, Ottertail and Blue Earth, started mandatory CWEPs in December 1983 and June 1984 respectively. All seven mandatory CWEPs are currently operating. Under current provisions, counties must allow UPs exempt from CWEP to participate if they choose.

## II. ASSISTED JOB SEARCH

Assisted job search in Minnesota's CWEP is not required under Federal or state law, but is mandated by DHS in keeping with the goal of helping participants find employment. It must last at least three days; in the county programs, it has lasted from three days to six weeks. In this job search, participants receive instruction in job-seeking skills and use these skills to search for employment. The instruction covers such topics as discovering job openings, writing letters and resumes, following leads, making contact by telephone, and interviewing. In some counties, job-search assistance has included an assessment of skills and interests and the development of a plan, based on these factors, for education, training, and job search; this process has sometimes been called "career planning" or "employability planning." The assisted job search is often carried out in groups, such as "job clubs," to allow sharing of experiences and to provide peer support. Some counties periodically provide a refresher in job-search instruction.

## III. WORK ASSIGNMENT

The work assignment is intended to provide work experience, teach job skills, and maintain or improve work habits as participants provide a useful service to the community. Generally an effort is made to have the participants work on projects related to their skills and interests, but this is not always possible. Often, a participant is interviewed by a potential work supervisor and assigned to the worksite only if selected. Work assignments must be in public agencies or private nonprofit organizations, and may not displace public employees from authorized positions or fill such positions if vacant.

Each county determines the number of hours per month a nonexempt participant is required to work, not to exceed what results from dividing the AFDC grant by the county's choice of either (1) the greater of the Federal or state minimum wage or (2) the prevailing area wage for similar work.

The goal of placing participants in regular jobs is to have priority over other aspects of CWEP. Accordingly, all participants on work assignments are to be allowed at least one business day per week for job search.

Participants may not be required to work more than six months per year, but they may volunteer to do so. (Originally, no such limit existed in the mandatory programs. In July 1984, a limit on mandatory work was set at three months per year; in November 1984, this limit was raised to the current level of six months per year.)

The county must reimburse participants for all costs of participating; if it cannot do so, it must reduce these costs until it can reimburse for all of them, even if this means reducing the amount of work required.

#### IV. OTHER PROVISIONS

In WIN counties, everyone participating in CWEP must first have searched for employment for two weeks in WIN. The WIN job search is separate from the CWEP assisted job search. All counties that have had CWEPs except Ottertail participate in WIN.

Each county program has an oversight committee consisting of county residents from several interest groups. In addition to other duties, the oversight committee has the responsibility (1) to hold nonbinding hearings to try to resolve participant grievances so that welfare-hearing procedures do not need to be invoked, (2) to provide a forum for participants and other interested parties to voice concerns, and (3) to review evaluations of the program done by DHS and make recommendations to the commissioner.

Federal reimbursement at 50% is available to the counties, under the AFDC administrative-match formula, for administrative costs and for participant reimbursement for the following: (1) transportation, (2) day care up to \$160 per month per child, and (3) other items up to \$10 per month. 6 Federal reimbursement is not available, however, for the costs of participant supervision or of materials or equipment used in work by participants.

## V. ADMINISTRATIVE STRUCTURE

The CWEPs in Minnesota have employed a variety of administrative structures.

In Blue Earth and Ottertail Counties, social service agency staff run the programs directly.

In other counties, outside organizations have provided staff or have run the programs under contract with the social service agencies. The Dodge County social service agency contracts with the county corrections department, and Itasca County contracts with the Arrowhead Economic Opportunity Agency, for the services of CWEP administrators. Morrison, Todd, and Wadena contracted with the Rural Minnesota Concentrated Employment Program (CEP) to run their voluntary programs. The Winona program and the current mandatory programs in Morrison and Todd are run by local Job Service staff under contract with the Minnesota Department of Economic Security.

## Chapter 3

### PROGRAM OPERATION

This chapter deals with CWEP operation. Sections I-IV present data on participation in CWEP, types of worksites used, types of positions in which participants worked, and operating costs. The data cover the six-quarter period from April 1, 1983 through September 30, 1984. Because the mandatory programs in Morrison and Todd Counties began after September 30, 1984, the information for these counties refers only to their voluntary programs. Sections V and VI provide information from county CWEP administrators on difficulties in finding worksites and from oversight committees on problems with CWEP that came to their attention.

#### I. PARTICIPANTS

Table 1 gives the numbers of participants completing orientation and beginning other CWEP components in all counties combined, for each quarter over the period April 1, 1983 - September 30, 1984 and for the entire period. The totals (right column) show that 827 people completed orientation, 492 began assisted job search, 406 began work assignments, and 122 started career or employability planning over the entire period.

The quarterly figures indicate substantial declines after the second quarter (7/1/83 - 9/30/83) in the numbers of participants completing orientation and beginning the other components. This pattern is probably due at least in part to two factors. First, when CWEP was new, the individuals beginning in the program included many who had been on welfare for some time; later, those starting in CWEP consisted more and more exclusively of persons just coming onto welfare. Second, employment opportunities improved over the period: the state unemployment rate dropped from an average of 7.8% for the first two quarters (4/1/83 - 9/30/83) to an average of 6.0% for the last two (4/1/84 - 9/30/84). 17

Table 2 shows a breakdown by county of the numbers of participants completing orientation and beginning other CWEP components over the period under consideration. By far, Itasca had the largest number of participants. It accounted for 338 of the 492 individuals who began job search (69%) and 255 of the 406 who began work assignments (63%). No one began job search in Blue Earth because at the time,

Table 1

Number of Counties Participating in CWEP and Numbers of Participants  
 Completing Orientation and Beginning Other CWEP Components in All Counties  
 by Quarter, April 1, 1983 - September 30, 1984

=====

	4/1/83- 6/30/83	7/1/83- 9/30/83	10/1/83- 12/31/83	1/1/84- 3/31/84	4/1/84- 6/30/84	7/1/84- 9/30/84	Total /b
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Number of Counties Participating /a

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6	6	6	7	6	6
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Number of Participants, All Counties Combined

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	4/1/83- 6/30/83	7/1/83- 9/30/83	10/1/83- 12/31/83	1/1/84- 3/31/84	4/1/84- 6/30/84	7/1/84- 9/30/84	Total
Completing Orientation	179	207	146	129	100	52	827
Beginning Job Search	90	120	109	96	47	16	492
Beginning First Work Assignment	68	108	81	65	47	30	406
Beginning Career or Employability Planning	28	33	11	7	12	17	122

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- a. Each county is counted only if it was in CWEP for at least two months during the quarter.
- b. Includes data for part of Todd County that do not appear in the quarterly amounts because their breakdown by quarter is unknown.

Table 2

Number of Quarters Each County Was in CWEP and Numbers of Participants  
 Completing Orientation and Beginning Other CWEP Components by County,  
 April 1, 1983 - September 30, 1984

	Blue Earth	Dodge	Itasca	Ottertail	Winona	Morrison	Todd	Wadena	Total
Number of Quarters the County Was in CWEP, April 1, 1983 - September 30, 1984									
	1-1/3	6	6	3-1/3	5-2/3	5	5-1/3	3-2/3	
Number of Participants, April 1, 1983 - September 30, 1984									
Completing Orientation	42	61	338	52	122	98	58	56	827
Beginning Job Search	0	19	338	52	36	20	22	5	492
Beginning First Work Assignment	21	12	255	49	29	16	12	12	406
Beginning Career or Employability Planning	0	28	0	0	54	0	32	8	122

this county did not include a job-search component as a result of a misunderstanding about its responsibility to do so; this misunderstanding has been eliminated. The zeroes for some counties for career or employability planning occur because it was optional for the counties to provide this component.

Work assignment differs from other components of CWEP in that individuals often stay on work assignments for several months. It is thus of interest to know not only how many persons begin work assignments over any period, but also the number on work assignments at a particular time (regardless of when they began their work assignments). It is also of interest to know how this number compares to the AFDC-UP caseload, because (1) in the mandatory programs work assignment has been required only for UPs (and only for those UPs not meeting the exemption criteria) and (2) 95% of all participants over the period covered were UPs.

Table 3 shows the average number of participants on work assignments and the average AFDC-UP caseload by county over those quarter-end months in which the county was in CWEP from June 1983 through September 1984 (a quarter-end month is defined here as the third month of a quarter). 18 The average number of participants on work assignments over the months in question was modest for all counties except Itasca, where it was a sizeable 135.8 (column 1). The number on work assignments partly reflects the UP caseload (column 2), but at the same time varies widely across counties as a percentage of this caseload (column 3). As one would expect, this percentage was generally larger in the counties with mandatory programs (the first five listed) than in those with voluntary programs (the last three). The relatively low percentage of 4.2% for Blue Earth County as compared with other counties with mandatory programs is probably due at least in part to the newness of that county's program during the period covered. Notably, the relatively large number on work assignments in Itasca County reflects not only the largest UP caseload among all counties, but also the largest ratio of participants on work assignments to UP caseload. It is also notable that in four of the counties with mandatory programs, the ratio of participants on work assignments to UP caseload was less than 30%, and that in Itasca it was only about half. This reflects at least three factors: (1) the programs in Dodge, Itasca, and Winona Counties were voluntary before August 1983, (2) some UPs are exempt in the mandatory programs, and (3) a three-month-per-year limit on mandatory work assignment was instituted in July 1984 (it was raised to six months after the period covered).

Data in Table 4 show that the individuals completing CWEP orientation over the six-quarter period were predominantly male UPs, which is to be expected since in most programs orientation was mandatory only for UPs, most of whom are male. Some UPs completing orientation, though only 7%, were female. Some non-UPs completed

Table 3

Average Number of Participants on Work Assignments and  
 Average AFDC-UP Caseload by County Over Those  
 Quarter-End Months a in Which the County Was in CWEP,  
 June 1983 - September 1984

	Average Number of Participants on Work Assignments (1)	Average AFDC-UP Caseload (2)	(1) as a Percentage of (2)
Blue Earth	4.5	107	4.2%
Dodge	2.8	13	21.5
Itasca	135.8	270	50.3
Ottertail	12.3	42	29.3
Winona	6.8	57	11.9
Morrison	3.2	95	3.4
Todd	2.9	82	3.5
Wadena	5.7	52	11.0

a. A quarter-end month is defined here as the third month of a quarter.

Table 4

Number of AFDC Recipients Completing CWEP Orientation  
By Sex and UP vs. Non-UP Status in All Counties,  
April 1, 1983 - September 30, 1984

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	Male	Female	Total
UP	726	57	783
Non-UP	7	37	44
Total	733	94	827

---

orientation because some programs provided for voluntary participation by non-UPs.

## II. WORKSITES

Table 5 lists types of worksites and their frequency of use. The programs have employed a wide variety of worksites: a participant may have worked, for example, in a highway or street department, park, nursing home, skating rink, day care center, food shelf, developmental achievement center, or drug crisis center. The most commonly used worksites were highway and street departments; elementary and secondary schools; and parks, campgrounds, and other natural resource areas.

## III. POSITIONS

Table 6 gives data on the positions in which CWEP participants worked. These positions, like the worksites, show great variety. They include, for example, building custodian, clerical worker, mechanic, nurse's aide, teacher's aide, driver, seamstress, brushing chipper operator, and lake and river access maintenance worker. The largest numbers of positions, and the positions to which participants were most frequently assigned, were in the categories of highway or street repair worker, building custodian, grounds maintenance worker, and building maintenance worker other than custodian.

## IV. COST

This section deals with the costs of operating CWEP over the six-quarter period from April 1, 1983 through September 30, 1984. It first presents cost data and then points out some problems in interpreting them.

Table 5

Types of Worksites Used, Number of Worksites Used of Each Type, and Number of Participants Working at Worksites of Each Type in All Counties, April 1, 1983 - September 30, 1984

---

Type of Worksite	Number of Worksites Used of Given Type	Number of Participants Working at Worksites of Given Type
Highway or street department	48	201
Elementary or secondary school	28	45
Park, campground, or other natural resource area	21	77
Nursing home	12	18
Maintenance shop	11	20
Social service agency	6	10
Hospital	5	42
Courthouse	5	9
Other /a	31	63

---

a. Skating rink, golf course, ski area, vocational training institution, day care center, food shelf, carpenter crew, landfill, senior citizens' apartment complex, developmental achievement center, veterans' services agency, family planning clinic, community theater, drug crisis center, program for homemakers in transition, YMCA, art center, rehabilitation industry (sheltered workshop), community action agency, private homes of elderly under auspices of a social service agency.

Table 6

Types of Positions Used, Number of Positions Used of Each Type, and Number of Participants Working in Positions of Each Type in All Counties, April 1, 1983 - September 30, 1984

Type of Position	Number of Positions Used of Given Type	Number of Participants Working in Positions of Given Type
Highway or street repair worker	50	118
Building custodian	44	51
Laborer	41	64
Grounds maintenance worker	27	58
Building maintenance worker other than custodian	27	27
Clerical worker	14	18
Equipment operator	11	11
Park development worker	10	10
Demolition worker	6	6
Carpenter	5	6
Mechanic	4	4
Nurse's aide	3	3
Other /a	17	22

- a. Teacher's aide, housekeeper, activities aide, driver, home health aide, day care worker, seamstress, sign layout worker, brushing chipper operator, lake and river access maintenance worker, laundry worker, food collector and disperser, painter, electrician.

## A. Data

Table 7 shows CWEP operating costs by category for all counties combined over the period April 1, 1983 - September 30, 1984. It also shows (1) the percentage of cost in each category that is reimbursable to the counties by the Federal government (see Chapter 2, section IV) and (2) the amounts reimbursable and nonreimbursable in each category based on the percentage reimbursable. The reimbursement figures (percentages and amounts) reflect what is possible rather than what actually occurred because (1) some counties did not obtain all the reimbursement to which they were entitled and (2) the allowable percentages and amounts of reimbursement are more relevant to a decision whether to extend CWEP. In viewing the cost data, attention should be paid to footnotes in the table. In addition, it should be borne in mind that a majority of the eight CWEP counties were in the program for less than the entire period covered.

The data in Table 7 indicate that the cost of operating the eight programs was approximately \$254,000 over the six-quarter period. The largest item of expenditure was for contracts with noncounty agencies and organizations (36% of the total), followed by participant reimbursement (20%). Compensation of county employees, for participant supervision and other purposes combined, amounted to \$49,131 or 19% of the total.

As illustrated by the figures in the second column, the expenditures for (1) employee compensation other than for participant supervision, (2) contracts, (3) employee travel, and (4) overhead were reimbursable by the Federal government at 50% under the AFDC administrative-match formula. The same was also true of participant reimbursement, but only within certain limits (see Chapter 2, section IV). The costs of participant supervision and of materials and equipment for work by participants were not reimbursable. Although the expenditures in the "other" category were paid entirely by the Federal and state governments because of particular circumstances, they would generally be reimbursable at 50%, and so the 50% figure is used to give a better indication of what would occur under a continuation of CWEP (see notes j and l in the table). Given the costs and reimbursable percentages in the various categories, approximately 44% of the total cost was reimbursable.

Table 8 breaks down the total cost from Table 7 by county and by quarter over the period April 1, 1983 - September 30, 1984. The cost for the entire period tended to be larger in those counties with greater participation over the same period (see Table 2 in Chapter 3). At the extremes, Itasca County accounted for 63% of all participants assigned to worksites and 68% of total cost over the six-quarters, while Dodge County accounted for 3% of all participants assigned to worksites and 2% of total cost.

Table 7

CWEP Operating Cost, Percentage Reimbursable, and Amounts Reimbursable  
and Nonreimbursable /a by Category for All Counties Combined,  
April 1, 1983 - September 30, 1984

Category	Amount	Percentage Reimburs- able <u>/a</u>	Amount Reimburs- able <u>/a</u>	Amount Nonreim- bursable <u>/a</u>
County employee compensation: <u>/b</u>				
Other than for participant supervision <u>/c</u>	\$ 25,467	50%	\$ 12,734	\$ 12,733
For participant supervision	23,664	0	0	23,664
Contracts with noncounty agencies and organizations <u>/d</u>	91,627	50	45,813	45,814
County employee travel <u>/e</u>	2,245	50	1,123	1,122
Participant reimbursement <u>/f</u>	51,150	50 <u>/k</u>	25,575	25,575
Materials for work by participants <u>/g</u>	6,517	0	0	6,517
Equipment for work by participants <u>/h</u>	1,388	0	0	1,388
Overhead <u>/i</u>	9,950	50	4,975	4,975
Other <u>/j</u>	41,840	50 <u>/l</u>	20,920 <u>/l</u>	20,920 <u>/l</u>
<b>Total</b>	<b>\$253,848</b>	<b>44% <u>/m</u></b>	<b>\$111,140</b>	<b>\$142,708</b>

- a. The percentages and amounts reimbursable are reimbursable to the counties by the Federal government under the AFDC 50-50 administrative-match formula.
- b. Each figure is computed by multiplying total compensation for each employee concerned by the proportion of the employee's time devoted to CWEP and then summing the results over all employees concerned.

Table 7 (continued)

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- c. Excludes certain employees, including agency directors, that are accounted for under overhead.
- d. A contract payment may be spent by the contracting organization in any of the other categories.
- e. Reimbursements to employees plus expenses paid directly by the county.
- f. Primarily for transportation. A relatively small amount of participant reimbursement, paid by WIN, is included in the "other" category.
- g. Includes only those items that are used once and not reused, such as sod, gravel, paint, gasoline, and replacement parts.
- h. Includes only those items that are used over a period of time, such as tools, machinery, and vehicles. On the basis of information provided by Itasca County, the only county with expenditures in this category, the equipment in question was assumed to last three years, and the expenditures for this equipment were accordingly divided evenly among twelve quarters beginning with the quarter of purchase.
- i. On the basis of DHS data, imputed as 15% of county employee compensation other than for participant supervision.
- j. Includes two items: a \$39,000 Federal grant to Itasca County used for counseling and job-search workshops, and \$2,840 of participant reimbursement paid by WIN (90% Federal, 10% state) in Todd County.
- k. This figure applies only to limited amounts in certain categories (see Chapter 2, section IV), but is nonetheless used to compute the reimbursable and nonreimbursable amounts.
- l. Although the Federal and state governments paid all of the costs categorized here (see note j), the percentage of these costs that would generally be reimbursable -- 50% -- is used because it is more relevant to a decision whether to continue the program.
- m. Determined as the total amount reimbursable in proportion to the overall total.

Table 8

Total Cost of CWEP by County and Quarter,  
 April 1, 1983 - September 30, 1984

	4/1/83- 6/30/83	7/1/83- 9/30/83	10/1/83- 12/31/83	1/1/84- 3/31/84	4/1/83- 6/30/84	7/1/83- 9/30/84	Total
Blue Earth	\$ 0	\$ 0	\$ 0	\$ 0	\$ 1,553	\$ 5,134	\$ 6,687
Dodge	1,199	1,088	1,192	928	618	450	5,475
Itasca	11,510	27,671	33,234	34,103	34,313	31,460	172,291
Ottertail	0	0	1,425	5,460	5,884	700	13,469
Winona	1,741	5,224	5,358	5,351	5,761	5,593	29,028
Morrison	515	811	900	780	903	70	11,105 /a
Todd	913	913	913	913	913	913	5,478
Wadena	3,641	3,223	2,007	1,444	0	0	10,315
Total	\$19,519	\$38,930	\$45,029	\$48,979	\$49,945	\$44,320	\$253,848 /a

a. Includes \$7,126 unallocated by quarter.

Table 9 compares total CWEP cost to the number of participants beginning their first work assignments by county for April 1, 1983 - September 30, 1984. Not surprisingly, the ratio of cost to the number beginning work assignments varied a great deal, from \$275 in Ottertail to \$1,001 in Winona. The average for all counties was \$625.

In viewing these figures, it should be borne in mind that the cost of CWEP covers not only work assignment but other program components as well. In addition, the variation across counties in cost per participant does not necessarily reflect variation in the efficiency of providing a given set of services under a given set of circumstances because both vary. For example, the counties probably vary in (1) the amount invested per participant in job search and employability planning, (2) the effort made to find worksites that correspond to the interests and abilities of participants or teach new skills, (3) the ease of finding worksites, (4) the monthly amount an average participant needs to be reimbursed, and (5) the amount of time an average participant stays in the program.

#### B. Problems of Interpretation

Several problems arise in interpreting the CWEP cost data, particularly in any attempt to use them to estimate the cost of an expanded program. First of all, as with any data, those presented here are subject to human error in accounting and reporting. For example, the two figures in Table 7 for county employee compensation were each produced by multiplying total compensation for each employee concerned by the proportion of the employee's time devoted to CWEP and then summing the results over all employees concerned. Obviously, substantial room for error exists in estimating what proportion of an employee's time is devoted to a particular program.

Beyond any difficulties in estimating the costs of the existing programs, any effort to use these costs to predict the cost of an expanded CWEP would have several problems. Setting aside the task of predicting the number of participants in an expanded program, many factors could cause the cost per participant in such a program to differ from what it has been in the eight counties (see Table 9). First, provisions defining the mandatory and voluntary participant groups could be different. If single parents were required to participate, for example, provision would have to be made for child care. Second, given any set of provisions regarding mandatory and voluntary participation, the characteristics of participants, such as skills, interests, and attitudes, could be different in the areas covered by an expanded program than in the eight counties. Third, the ease or difficulty of obtaining enough worksites of appropriate

Table 9

Comparison of Total CWEP Cost to Number of Participants Beginning First Work Assignment by County, April 1, 1983 - September 30, 1984

	Number of Participants Beginning First Work Assignment <u>/a</u> (1)	Total Cost <u>/b</u> (2)	Cost per Participant Beginning First Work Assignment ((2)/(1))
Blue Earth	21	\$ 6,687	\$ 318
Dodge	12	5,475	456
Itasca	255	172,291	676
Ottertail	49	13,469	275
Winona	29	29,028	1,001
Morrison	16	11,105	694
Todd	12	5,478	457
Wadena	12	10,315	860
Total	406	\$253,848	\$ 625

a. From Table 2.

b. From Table 8.

types and the proximity of participants to worksites could be different in different areas. Fourth, the distribution of costs among categories could be different than in the current programs, which would affect the percentage of total cost for which the participating counties could obtain Federal reimbursement since only some costs are reimbursable. Finally, differences in administrative structures could produce differences in cost per participant. (The administrative structures of the current programs are described in the last section of Chapter 2.)

#### V. DIFFICULTIES IN OBTAINING WORKSITES

One possible problem with a mandatory or voluntary work program for welfare recipients is a shortage of worksites, especially if particular types of worksites are desired. The county CWEP administrators provided information on the extent of this problem in their programs.

In response to a question about delays in assigning participants to worksites, administrators in two counties reported that because of insufficient numbers of available positions, they had sometimes encountered delays of a month or more in making assignments. They also indicated, however, that this problem had occurred only in the early phases of their programs. Administrators in the other six counties indicated that no such delays had occurred.

In reply to an open-ended question about problems in running CWEP, one administrator wrote that it was difficult to find worksites where anything other than menial tasks would be performed. Two administrators indicated difficulties in finding worksites close enough to rural participants. One of these wrote the following:

Limited resources in [rural] areas make it nearly impossible to develop work sites which would provide a meaningful experience for clients and also be within a reasonable driving distance of their homes. As a result, clients who live in or near town have greatest access to appropriate work sites. Rural clients and those on the fringes of the county, those who would probably benefit most from a work experience, go without services because it is either impossible or not feasible to furnish them.

Finding worksites for rural participants, however, should be easier under Federal regulations effective October 1, 1984 that make 50% Federal reimbursement available to the counties for participant reimbursement for all transportation costs arising from CWEP participation; previously, participant reimbursement qualifying for

Federal reimbursement (at 50%) was limited to \$25 per month for all items.

## VI. PROBLEMS COMING TO ATTENTION OF OVERSIGHT COMMITTEES

The chairperson of each oversight committee was asked to provide information from the committee about any problems that had come to its attention through participant complaints or otherwise.

The Ottertail County committee and the single committee for the voluntary programs in Morrison, Todd, and Wadena Counties reported that they had not heard of any problems.

The committee in Blue Earth County had not received any complaints from participants, but made reference to a letter it had received from a former program administrator in that county, which pointed out the following problems:

1. Many individuals were referred to CWEP before enough worksites were developed, and therefore could not be assigned to worksites for several months.
2. There were not enough personnel to run the program, so that participants did not receive the contact necessary for change and motivation.
3. Work assignments on township roads provided no meaningful experience and were frustrating for participants, because of factors such as lack of equipment and a sense of providing slave labor.

The current CWEP administrator in Blue Earth County has indicated that (1) while the first point characterized the early stage of the program, it is no longer a problem, (2) the second point is a concern but not a major problem, and (3) the road crews doing the work assignments to which the third point refers have been eliminated.

In Dodge County, a participant assigned to the county highway department complained that while other workers were receiving \$5.08 per hour, he was working off his grant at the minimum wage of \$3.35 doing the same type of work. DHS policy at the time was that the maximum amount of work required was to be computed with the minimum wage, but this policy has since been changed to allow use of the minimum or prevailing wage at the county's discretion.

The chairperson of the Itasca County oversight committee had handled four complaints about CWEP since fall 1983, and had dealt with them primarily in her capacity as a legal aid attorney and only secondarily as an oversight committee member. She felt that it would be inappropriate to discuss the cases.

The Winona County committee reported the following:

1. A participant complained that at one worksite he was harassed and ridiculed by employees for being on welfare, his lunches were stolen, and he was not given safety glasses when sawing wood and received a splinter in his eye. This worksite was terminated.
2. Two participants who worked for a year in CWEP as janitors and received good evaluations from their supervisors were denied interviews when they applied for an open janitor position at the worksite. This worksite was terminated.

## Chapter 4

### HOW CWEP AFFECTS PARTICIPANTS

This chapter presents information on how CWEP has affected participants -- to what extent it has helped them find employment and how it has affected them in other ways. Section I presents views from participants as expressed in a survey; section II presents views from county CWEP administrators; section III provides data on AFDC case closures due to increased employment and earnings among those who have completed CWEP orientation.

#### I. VIEWS FROM PARTICIPANTS

A survey of current and former CWEP participants provided information on how they viewed their CWEP work experience. Since CWEP is distinguished from other employment and training programs primarily by work assignment, the questionnaire dealt only with this aspect of CWEP and was administered only to individuals who had been on work assignments.

For administering the questionnaire, current and former participants who had been on work assignments were divided into three groups: (1) those no longer on work assignments at the time of the survey (whether or not they were still in the program), (2) those on mandatory work assignments at the time of the survey, and (3) those on voluntary work assignments at the time of the survey. Those no longer on work assignments were sent questionnaires through the mail with postage-paid return envelopes addressed to DHS. In order to achieve a higher response rate than was expected with the mailed questionnaires, different survey methods were used with the other two groups. Participants on mandatory work assignments at the time of the survey were invited by the county CWEP administrators to attend sessions to fill out questionnaires, with the provision that those doing so would receive eight hours of credit toward their work assignments. The credit was intended as an incentive to attend. An oversight committee member attended each session along with the CWEP administrator. At each session, participants filled out their questionnaires, sealed them in envelopes, and gave them to the oversight committee member, who sent the envelopes back to DHS. Participants on voluntary work assignments at the time of the survey were asked 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.

All participants were told that their questionnaires would not be identified as theirs. The procedures for returning the completed questionnaires of the three groups to DHS -- in a way that prevented the county CWEP administrators and oversight committee members from seeing the questionnaires -- were intended to assure the respondents that their answers would indeed be anonymous.

A slightly different version of the questionnaire was used for those on work assignments at the time of the survey than for those no longer on work assignments. Fascimiles of the two versions appear in Appendix D.

A total of 403 participants from the three groups were asked to fill out questionnaires and 159 did so, for an overall response rate of 39.5%. As expected, the response rates of those on mandatory and voluntary work assignments at the time of the survey (who were asked to fill out questionnaires at sessions or on worksites) were higher than the response rate of those no longer on work assignments (who received their questionnaires by mail). Of the 135 individuals on mandatory work assignments at the time of the survey, 106 attended sessions and completed questionnaires, giving a response rate of 78.5% for these people. Only 9 participants at the time were on voluntary work assignments; 8 of these completed questionnaires for an 88.9% response rate. Of the 259 persons no longer on work assignments, only 45, or 17.4%, returned questionnaires.

It should be emphasized that since the overall response rate (39.5%) was less than half, the results are to be viewed with caution because those who completed questionnaires may have different views on the program than those who did not.

The questionnaire results are shown in Table 10. Note that for items 1-4, the percentages refer to all individuals filling out questionnaires, while for items 5-22, they refer only to those answering the question concerned.

Items 2 through 12 in the table give background information on the respondents, which should be taken into account in considering their views on their CWEP work experience. About 72% of the respondents were on mandatory or voluntary work assignments at the time of the survey (item 2), and about 84% were individuals who were on mandatory work assignments at the time or who were no longer on work assignments but whose work assignments had been mandatory the whole time (item 3). The overall response was heavily weighed toward Itasca County, with 76.1% of the completed questionnaires coming from that county (item 4). This reflects the preponderant number of program participants in Itasca County.

Table 10

## Results from Participant Questionnaire: All Respondents /a

	Number	Percentage /b
1. Respondents	159	100.0%
2. On a work assignment at time of survey	114	71.7
3. On a mandatory work assignment at time of survey, or no longer on a work assignment but work assignment was mandatory the whole time	133	83.6
4. County:		
Blue Earth	12	7.5
Dodge	3	1.9
Itasca	121	76.1
Ottertail	9	5.7
Winona	5	3.1
Morrison	3	1.9
Todd	3	1.9
Wadena	3	1.9
5. Age:		
0-29	68	43.3
30-39	59	37.8
40-49	21	13.4
50+	9	5.7
N.R.	2	N.A.
6. Sex:		
Male	148	93.1
Female	11	6.9
N.R.	0	N.A.
7. Education:		
Less than high school	34	22.2
High school only	98	64.1
One year of college or more	21	13.7
N.R.	6	N.A.

Table 10 (continued)

	Number	Percentage /b
8. Completed program at a trade or vocational school before participating in CWEP:		
Yes	43	27.4%
No	114	72.6
N.R.	2	N.A.
9. Hourly wage of highest-paying job:		
\$0-3.99	12	7.9
4.00-5.99	39	25.7
6.00-7.99	29	19.1
8.00-9.99	25	16.4
10.00-11.99	25	16.4
12.00+	22	14.5
N.R.	7	N.A.
10. Hours per week at highest-paying job:		
0-29	7	4.6
30-39	5	3.3
40	81	53.3
41+	59	38.8
N.R.	7	N.A.
11. Hourly wage of longest job:		
\$0-3.99	28	18.8
4.00-5.99	53	35.6
6.00-7.99	23	15.4
8.00-9.99	15	10.1
10.00-11.99	21	14.1
12.00+	9	6.0
N.R.	10	N.A.
12. Hours per week at longest job:		
0-29	5	3.4
30-39	7	4.7
40	86	57.7
41+	51	34.2
N.R.	10	N.A.

Table 10 (continued)

	Number	Percentage /b
13. Treatment by work supervisor(s):		
a. With respect	95	66.0%
With disrespect	48	33.3
Both /c	1	0.7
N.R.	15	N.A.
b. Fairly	106	86.9
Unfairly	15	12.3
Both /c	1	0.8
N.R.	37	N.A.
14. a. Learned new skills through work in CWEP?		
Yes	44	28.9
No	108	71.1
N.R.	7	N.A.
b. If so, are at least some of these useful for finding a regular job?		
Yes	32	80.0
No	6	15.0
Not sure	2	5.0
N.R.	4	N.A.
15. a. Ever obtained a job at least partly because of CWEP work experience? (Asked only of those no longer on work assignments.)		
Yes	10	22.7
No	34	77.3
N.R.	1	N.A.
b. If so:		
Starting wage of this job:		
\$0-3.99	0	0.0
4.00-5.99	5	71.4
6.00-7.99	2	28.6
8.00+	0	0.0
N.R.	3	N.A.

Table 10 (continued)

	Number	Percentage /b
Hours per week at this job:		
0-29	4	50.0%
30-39	1	12.5
40	2	25.0
41+	1	12.5
N.R.	2	N.A.
16. Better prepared to find employment as a result of CWEP work experience other than through skills learned? (Asked only of those no longer on work assignments who did not respond "yes" to #15(a) and of those still on work assignments.)		
Yea	24	16.8
No	92	64.3
Not sure	27	18.9
N.R.	6	N.A.
17. Prevented by CWEP work from spending as much time as otherwise searching for employment?		
Yes	49	32.0
No	79	51.6
Not sure	25	16.3
N.R.	6	N.A.
18. Reimbursed for all costs arising from CWEP work?		
Yes	102	73.4
No	37	26.6
N.R.	20	N.A.
19. "How did your CWEP work make you feel about being on welfare?"		
Much better	35	22.7
Somewhat better	38	24.7
No Different	41	26.6
Somewhat worse	20	13.0
Much worse	20	13.0
N.R.	5	N.A.

Table 10 (continued)

	Number	Percentage /b
20. "Did your CWEP work make you respect yourself any more or less?"		
Much more	28	18.2%
Somewhat more	32	20.8
No more or less	68	44.2
Somewhat less	12	7.8
Much less	14	9.1
N.R.	5	N.A.
21. "Did your CWEP work make your family and friends respect you any more or less?"		
Much more	11	7.3
Somewhat more	20	13.2
No more or less	78	51.7
Somewhat less	17	11.3
Much less	10	6.6
Not sure	15	9.9
N.R.	8	N.A.
22. "Do you think welfare recipients should be required to work in return for their welfare benefits, provided that they are able-bodied and do not need to take care of others, such as young children or aged parents?"		
Yes, unqualified /d	74	47.7
Yes, qualified	16	10.3
No, unqualified	32	20.6
No, qualified	6	3.9
Not sure	27	17.4
N.R.	4	N.A.

- a. "N.R." in items 5-21 denotes "no response."
- b. For items 1-4, the percentages refer to all respondents; for items 5-22, they refer only to those answering the question.
- c. Although this category did not appear in the questionnaire, it was used in the tabulation of answers to accommodate ambivalent responses.
- d. See text for an explanation of these categories.

The respondents were predominantly younger than 40 and male, most had not completed a year of college, and most had never completed a program at a trade or vocational school (items 5-8). Almost half had earned at least \$8.00 an hour at their highest-paying jobs, and about 30% had earned at least this much at their longest jobs (items 9 and 11); more than 90% had worked at least 40 hours a week at their highest-paying jobs and their longest jobs (items 10 and 12).

Items 13 through 21 provide a view of CWEP work experience through the eyes of the participants. Regarding the treatment of participants by work supervisors, 66.0% of those answering said their supervisors treated them with respect (item 13(a)). It is encouraging that this constitutes a large majority, but it is also disturbing that 33.3% said their supervisors treated them disrespectfully. The participants gave a strongly favorable evaluation of their work supervisors when 86.9% said their supervisors treated them fairly (item 13(b)).

One of the purported benefits of CWEP is that by imparting new skills to participants or by other means, it helps them obtain employment. Items 14-16 speak to this question. Most respondents (71.1%) said they did not learn any new skills through their work in CWEP, but a substantial minority (28.9%) said they did (item 14(a)). Of those who did, 80.0% indicated they thought at least some of the skills they learned were useful for finding a regular job (item 14(b)). Assuming that the percentages for those answering the questions also apply to those who did not, the responses indicate that 23.1% (80.0% of 28.9%) learned new skills that they considered useful for finding a regular job.

Those respondents no longer on work assignments were asked if they had ever obtained a job at least partly because of their CWEP work experience (item 15(a)). Of those responding, 22.7% (10 individuals) said they had. According to responses not reported in the table, half of these people indicated that they acquired their new jobs by means of direct contact with an employer through their CWEP work, while the other half said that skills acquired through their CWEP work were the reason. Item 15(b) provides information on the jobs these people obtained. It should be emphasized that since the number of participants involved in item 15 are small, the proportions in question are subject to substantial random variation.

Those respondents who either (1) were no longer on work assignments and had not obtained jobs through their CWEP work experience or (2) were still on work assignments were asked whether their CWEP work experience had helped prepare them to find employment other than by teaching them new skills (item 16). Of those responding, only 16.8% said yes.

Items 17 and 18 relate to possible costs of CWEP work experience for the participants. Those on work assignments are supposed to be allowed at least one business day per week to search for work. Nevertheless, 32.0% said their work assignments prevented them from spending as much time searching for employment as they would have otherwise (item 17). If this proportion is an accurate indication of the extent to which a CWEP work assignment impedes job search, it is cause for concern; however, this result should be viewed with caution. Of those who said their CWEP work assignments impeded their job search, only 17% worked 100 hours or more per month on these work assignments (according to questionnaire results not presented in the table). It should be borne in mind, though, that some CWEP participants may hold part-time jobs, so that even if their work assignments alone would not impede job search, their work assignments and their jobs together may do so. Unfortunately, data were not collected to determine to what extent this occurs.

Individuals are not supposed to incur any direct financial costs from participating in CWEP; the counties are required to reimburse them for all costs of participation. If a county is unable to reimburse participants for all costs, it has the responsibility to reduce these costs to the point where it can reimburse for all of them, even if this means reducing the amount of work required of the participants. For most of the period in question, Federal reimbursement at 50% was available to the counties, under the AFDC administrative-match formula, for reimbursements to participants up to \$25 per month. <sup>19</sup> In light of these considerations, it is disturbing that 26.6% of the respondents said they were not reimbursed for all costs arising from their work in CWEP (item 18).

Items 19-21 concern the feelings and attitudes of participants and their peers. When asked how their CWEP work made them feel about being on welfare, nearly half the respondents indicated "much better" or "somewhat better," approximately a quarter indicated "no different," and about a quarter indicated "somewhat worse" or "much worse" (item 19). Working in CWEP was well more than twice as likely to increase the respondents' self-respect as it was to decrease it, although 44.2% indicated that their CWEP work made no difference in this regard (item 20). When the respondents were asked whether their CWEP work made their family and friends respect them any more or less, over half indicated "no more or less" and the remainder were about equally split between indicating more and indicating less (item 21).

To gauge the participants' views on the desirability in principle of mandatory work for welfare recipients, they were asked, "Do you think welfare recipients should be required to work in return for their welfare benefits, provided that they are able-bodied and do not need to take care of others, such as young children or aged parents?" (item 22) In the tabulation of responses to this question, the "yes" and "no" answers were categorized according to

whether or not they were qualified by any additional verbal responses the participants gave. A "yes" or "no" was sometimes qualified, for example, by a statement that work should be mandatory for welfare recipients only if it is "meaningful" or teaches new skills. /10 Of those responding, 47.7% gave an unqualified "yes," 20.6% gave an unqualified "no," and the remainder gave a qualified "yes" or "no" or were not sure.

## II. VIEWS FROM PROGRAM ADMINISTRATORS

The county CWEP administrators were asked several questions on how the program had helped any participants (in finding employment or otherwise) and why it had not helped others. The themes in their responses follow.

### A. How CWEP Has Helped Some Participants

Most of the CWEP administrators indicated that the program had helped prepare some participants to find employment, through such factors as (1) new job skills, (2) a current work history with resume and references, (3) better work attitudes and habits, (4) improved job-search skills, and (5) greater confidence and motivation. Some of these factors stem from work assignment while others come from assisted job search or employability planning. A few administrators believe some participants actually obtained jobs partly because of these factors. One cited instances where participants performed well enough on their work assignments that their supervisors hired them as regular employees. /11

The CWEP administrators also believed that the program had helped some participants in other ways, in particular by (1) enhancing their self-esteem through productive work, (2) improving their relationships with their families, (3) exposing them to new people and situations, and (4) giving them reasons to be responsible and accountable.

### B. Why CWEP Has Not Helped Other Participants

One CWEP administrator wrote that given the types and numbers of worksites available, most work assignments do not match the interests and abilities of participants and do not teach new skills.

The administrator also indicated that the value to a participant of a work assignment hinges greatly on the values and efforts of the supervisor and regular employees. According to this administrator, many participants view the requirements of CWEP as punitive and have a negative attitude toward the program, but those who have cooperated and taken advantage of the services offered (such as counselling and job-search assistance) have often changed their opinions.

Several CWEP administrators indicated a belief that one reason the program does not help all participants is that it is simply not designed to deal with the wide variety of problems the participants may have. One administrator wrote that the program often cannot deal, for example, with inadequate social skills, poor hygiene, lack of a high-school diploma, inability to read or write, inadequate understanding of proper work habits, or attitudinal problems. Another administrator indicated that some participants find themselves "in the same old rut" after completing the program, because of such things as refusing to "take a look at themselves," refusing to consider jobs that would involve career changes, or not having adequate transportation. Finally, one administrator wrote the following:

Those who have not been helped are in the depths of despair, discouragement, and depression. Their negative attitudes have not been helped by the program. Many [have] problems that the program seems unequipped to delve into. Chemical dependency is evident in many (participants) and they cannot be job-ready until this is addressed. If they do not want to volunteer for treatment, there is nothing Social Services or CWEP can do. I also have a few clients who need English tutoring. They are refugees, but there is no money available for tutoring these people; CWEP can't help them without some resources.

### III. CASE CLOSURES FROM INCREASED EMPLOYMENT AND EARNINGS

Although it is important to know the effect of CWEP on the ability of its participants to find employment, adequate data for estimating this effect are unavailable (see note 11). Nonetheless, the employment characteristics of individuals who have participated in the program may be of interest. Unfortunately, however, direct data on these characteristics are also unavailable. As an alternative, Table 11 presents, for each county, the numbers of individuals completing CWEP orientation over April 1, 1983 - September 30, 1984 and, among these people, (1) the number of case closures that were classified as being due to increased employment or earnings and (2)

the number of such closures that were not attributable to a recall by a former employer.

These data have at least two serious shortcomings as an indication of the extent to which CWEP helps its participants find employment. First, those case closures that are classified as being due to increased employment or earnings do not include all case closures that are actually attributable to either factor. The reason is that if an AFDC recipient experiences an increase in employment or earnings sufficient to terminate eligibility, this individual may, for example, leave the county, stop responding to the agency's efforts to contact him or her, or simply indicate that assistance is no longer needed, with the result that the case closure will be classified as being due to some other factor than increased employment or earnings. A second shortcoming of the case-closure data for present purposes is that some of the increases in employment or earnings that caused case closure are likely to have occurred without CWEP, even leaving aside those attributable to recalls.

As indicated by the third column of Table 11, among individuals completing CWEP orientation over April 1, 1983 - September 30, 1984, the number of case closures classified as being due to increased employment or earnings not attributable to a recall range from zero in Ottertail and Todd Counties to 19 in Dodge, excluding Itasca and Winona Counties where the information was unavailable. Among the 367 individuals completing orientation in counties other than Itasca and Winona, 41, or 11%, experienced case closures that were classified as being due to increased employment or earnings not attributable to a recall by a former employer. In view of the caveats previously mentioned, these figures may either understate or overstate the number of individuals experiencing increased employment or earnings because of participating in CWEP.

To properly estimate the effects of CWEP on the employment and earnings of participants would require a large-scale effort to collect and analyze data on CWEP participants and non-participants before and after the participants have been in the program.

Table 11

Number of AFDC Case Closures Classified as Being Due to Increased  
Employment or Earnings Among Individuals Completing CWEP  
Orientation Over April 1, 1983 - September 30, 1984, By County

	Case Closures Classified as Being Due to Increased Employment or Earnings Among Individuals Completing Orientation		
	Individuals Completing Orientation /a	Total	Not Attributable To a Recall By a Former Employer
Blue Earth	42	9	9
Dodge	61	22	19
Itasca	338	43	unknown
Ottertail	52	34	0
Winona	122	59	unknown
Morrison	98	7	7
Todd	58	0	0
Wadena	56	8	6
Total	827	182	41 + unknowns

a. From Table 2.

## Chapter 5

### OTHER ASPECTS OF CWEP

This chapter concerns two other aspects of CWEP: the nature and value of work done by participants and the effects of the program, if any, on AFDC-UP caseload.

#### I. NATURE AND VALUE OF WORK PERFORMED

One of the benefits of CWEP is the value to the community of work done by participants. This value is difficult to assess. In concept, it is what everyone benefitting from the work would be willing to pay for it. This quantity, however, cannot be determined.

An alternative is merely to consider the nature of the work performed. The county CWEP administrators were asked to describe some of the work typically done by participants. The following is some of the work indicated:

building maintenance, repair, and custodial work;

complete development of a city park and other recreational areas including ball fields, tennis courts, and hockey rinks;

cleaning and maintenance of public accesses to lakes;

replacement of sidewalks;

development of bicycle and snowmobile trails;

demolition of old buildings;

snow removal;

grounds maintenance in parks and along roads;

street and road maintenance and repair;

building and painting picnic tables;

soil conservation; and

setting up and taking down equipment at county fairgrounds.

Participants also performed several other types of work, as indicated by the information on types of worksites and positions in sections II and III of Chapter 3.

Two administrators cited work by particular individuals. One reported that a participant assigned to a developmental achievement center worked one-to-one with clients of the center who would otherwise have received less attention, and that another participant clerking in a social service agency was a "valuable asset," helping to update a filing system and compiling data for state forms. Another administrator wrote that one participant, in what admittedly was an atypical case, received a letter of recognition for "outstanding" work with handicapped persons at a developmental achievement center.

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

Six of the eight CWEP counties reported that a total of approximately 89,500 hours of work were done by participants from April 1, 1983 through September 30, 1984. Data were unavailable from Morrison and Wadena. Multiplying the number of hours reported by \$3.35 gives a figure of \$299,825. For reasons previously indicated, this amount can only be taken as suggestive. However, it is interesting to note that it exceeds the total estimated CWEP cost of \$232,428 for the six counties other than Morrison and Wadena over the same period (see Table 8 in Chapter 3). Moreover, if the value of output is to be estimated as the value of input, which is being done here, it is appropriate to include the costs of materials, equipment, and participant supervision in the estimated value of output. Again, however, any estimate from this technique can only be regarded as suggestive.

## II. EFFECTS ON CASELOAD

Another important aspect of CWEP is its effect, if any, on AFDC caseload and, thereby, on AFDC payments. This section concerns the effects of CWEP on AFDC-UP caseload. It deals only with UP caseload because CWEP has been mandatory only for UPs. It first discusses how the effects may occur, then describes how they were estimated, and finally presents the results.

### A. How the Effects May Occur

Theoretically, CWEP may either reduce or increase AFDC-UP caseload.

Whether the program is mandatory or voluntary, it may reduce caseload by increasing the ability of participants to find employment in ways described in Chapter 4. Not only may CWEP provide a more attractive option, in this manner, for leaving AFDC; it is also likely to affect the attractiveness of the option of being on AFDC. A mandatory CWEP makes the option of being on AFDC less attractive than otherwise for those individuals who, if on AFDC, would prefer not to participate in CWEP but to engage in other activities. These other activities might be, for example, work in the home, leisure, job search (although CWEP is not supposed to impede job search), or unreported employment. Furthermore, a preference for other activities might stem from positive attributes of these activities or from negative attributes of participating in CWEP, such as dislike of the work or a feeling of being degraded, penalized, or stigmatized by it.

Working in the opposite direction, either a mandatory or a voluntary program makes the option of being on AFDC more attractive than otherwise for any individuals who, if on AFDC, prefer participating in CWEP to pursuing other activities. Such individuals, for example, may desire to provide something in return for their AFDC benefits, may enjoy the work or contacts with people in CWEP, or may merely wish to be doing something outside of the house.

Thus, either a mandatory or a voluntary CWEP may reduce or increase caseload. Note that any effects of CWEP on the employability of participants will affect caseload through participants' decisions whether to remain on AFDC, but the other factors mentioned may affect caseload through individuals' decisions whether to apply for AFDC in the first place or their decisions whether to remain on AFDC once there.

## B. Estimation Procedure

The effect of CWEP on AFDC-UP caseload was estimated, for each CWEP county except Blue Earth, with multiple regression analysis to control for other variables, such as economic conditions, that might also affect caseload.

Blue Earth County was excluded because its program had not been in effect long enough during the period covered to allow the effect in that county to be estimated. Although the analysis was technical, it may be described as consisting essentially of the following.

For each CWEP county concerned, the analysis used monthly data for that county and for four adjacent or nearby counties without CWEPs over the period from March 1982 through August 1984, during which the county CWEPs began (see Chapter 2). "Period one" and "period two" denote, respectively, the period when CWEP was not operating and the period when it was operating in the CWEP county. For each county, the quantity  $PROPDIF$  was computed as the average AFDC-UP caseload over period two minus the average UP caseload over period one, expressed as a proportion of the average for period one. The quantity  $PROPDIF(C)$  denotes the value of  $PROPDIF$  for the CWEP county. The quantity  $PROPDIF(N)$  was computed as the average value of  $PROPDIF$  for the four non-CWEP counties. During this process, control was provided for a different trend in caseload in each county and for a different effect of the unemployment rate on caseload in each county. It was assumed that with this control,  $PROPDIF(C)$  in the absence of CWEP would have been the same as  $PROPDIF(N)$ . On this assumption,  $PROPDIF(N)$  was used as a basis against which to compare  $PROPDIF(C)$ , and the quantity  $PROPDIF(C) - PROPDIF(N)$  was attributed to the effect of CWEP. CWEP would be estimated to have a negative effect on caseload, for example, (1) if  $PROPDIF(C)$  was negative and  $PROPDIF(N)$  was positive, (2) if  $PROPDIF(C)$  and  $PROPDIF(N)$  were both negative but  $PROPDIF(C)$  was a larger negative amount than  $PROPDIF(N)$ , or (3) if  $PROPDIF(C)$  and  $PROPDIF(N)$  were both positive but  $PROPDIF(C)$  was smaller than  $PROPDIF(N)$ .

## C. Results

This procedure failed to yield any statistically significant results indicating either a negative or a positive effect of CWEP on AFDC-UP caseload in any of the seven CWEP counties analyzed. 12

## Chapter 6

### SUMMARY

In compliance with Minnesota Statutes section 256.737, this report analyses the Community Work Experience Program (CWEP) in Minnesota, providing information "on the feasibility of permanent implementation and on the cost effectiveness of each of the [county CWEP] demonstration programs."

The Federal Omnibus Budget Reconciliation Act of 1981 authorized states to operate Community Work Experience Programs, whose stated purpose is "to provide work experience and training" to AFDC recipients. In a CWEP, a state may require any group of AFDC recipients not meeting Federally mandated exemption criteria, essentially the same as in the Work Incentive Program (WIN), to perform work that serves a useful public purpose as a condition of AFDC eligibility. The state may also provide for voluntary participation by any other AFDC recipient group. The work performed must be in public agencies or private nonprofit organizations and must not displace employees or fill established vacancies. Participants must be reimbursed for all necessary participation expenses. Federal reimbursement is available at 50%, under the AFDC administrative-match formula, for CWEP administrative expenses and for participant reimbursement within limits, but not for participant supervision or materials or equipment for work by participants.

Since spring 1983, eight Minnesota counties have operated CWEPs; seven now do. The programs have consisted, at minimum, of an orientation, assisted job search (three days to six weeks), and work assignment (indefinite period). Under state provisions, the seven current programs require participation by AFDC unemployed parents (UPs) not meeting certain exemption criteria, and also allow for voluntary participation by other UPs. Previously, three programs did not require any recipients to participate beyond orientation.

The assisted job search, not Federally mandated but required by the Department of Human Services, reflects an emphasis on the goal of helping participants find employment. In this job search, participants receive instruction in job-seeking skills and use these skills to search for employment. The instruction covers such topics as discovering job openings, writing letters and resumes, following leads, making contact by telephone, and interviewing.

The work assignment is intended to provide work experience, teach job skills, and maintain or improve work habits as participants provide a useful service to the community. Generally an effort is

made to have the participants work on projects related to their skills and interests, but this is not always possible. The county determines the monthly amount of work required of nonexempt participants, not to exceed what results from dividing the AFDC grant by the county's choice of the minimum wage or the prevailing area wage for similar work. Participants on work assignments must be allowed one business day per week for job search, and may not be required to work more than six months per year, although they may volunteer to do so.

Each county has an oversight committee consisting of county residents from several interest groups. In addition to other duties, the oversight committee has the responsibility (1) to hold nonbinding hearings to try to resolve participant grievances to obviate the need for welfare-hearing procedures and (2) to provide a forum for participants and other interested parties to voice concerns.

In Blue Earth and Ottertail Counties, social service agency staff run CWEP directly. In the other CWEP counties, outside agencies or organizations have provided staff or have run the programs under contract with the social service agencies.

From April 1, 1983 through September 30, 1984, 827 individuals in the eight CWEP counties completed program orientation, 492 began assisted job search, and 406 began work assignments. Itasca County accounted for 69% of those beginning job search and 63% of those beginning work assignments. Participants were predominantly male UPs.

The number of participants on work assignments at a given time averaged 136 in Itasca County, 12 in Ottertail County, and 7 or less in the remaining counties. The average number on work assignments as a proportion of UP caseload at a given time also varied widely across counties, from 50% in Itasca to 29% in Ottertail to 22% or less in the other counties. As would be expected, this proportion was higher where work assignment was mandatory for nonexempt UPs than where it was voluntary (leaving aside one program with mandatory work assignment that had operated only a short time before the end of the period covered).

The most common worksites were street and highway departments, schools, and parks and other natural resource areas. The work most often done was maintenance of streets, highways, buildings, and grounds. However, participants performed a wide variety of other work -- for example, as teachers' aides, clerical assistants, and carpenters.

CWEP cost a total of \$253,850 over April 1, 1983 - September 30, 1984. Given the categories of expenditure that are reimbursable at

50% by the Federal government and the distribution of total expenditure among these categories, \$111,140, or 44% of total cost, was reimbursable. The cost per participant beginning a work assignment averaged \$625 but varied across counties from \$275 to \$1,001. Some variation in cost per participant probably reflects variation not only in efficiency but also in the services provided and the circumstances in which they are provided. Predicting the cost of an expanded CWEP would be problematic, not only because of difficulties in predicting the number of participants, but also because, for several reasons, the cost per participant could differ from what it has been in the eight CWEP counties.

In response to an open-ended question about difficulties in running CWEP, one program administrator wrote that it was difficult to find worksites where anything other than menial tasks would be performed, and two administrators indicated difficulties in finding worksites close enough to rural participants. This problem, however, is less severe under Federal regulations effective October 1, 1984, which provide 50% Federal reimbursement to the counties for participant reimbursement for all transportation expenses arising from CWEP participation; previously, no Federal reimbursement was available for participant reimbursement over \$25 per month.

Statements from oversight committees indicated some isolated problems in CWEP, but these did not show any general pattern.

A survey of current and former CWEP participants provided information on how they viewed their CWEP work experience. Individuals filled out their own questionnaires and their answers were anonymous. Of the 403 participants asked to fill out questionnaires, 159 did so, for a response rate of 40%. Given this figure, the results must be viewed with caution because those who completed questionnaires may have different views on the program than those who did not. Approximately three quarters of those completing questionnaires were from Itasca County. Among the responses were the following: 66% were treated with respect, and 87% were treated fairly, by their work supervisors; 23% learned skills they considered useful for finding a job; 32% were prevented by their CWEP work from searching for employment as much as they would have otherwise; 27% were not reimbursed for all costs of participation; 47% felt better about being on welfare, and 26% felt worse, because of their work in CWEP; and finally, 58% replied yes, and 25% no, when asked if they thought welfare recipients should be required to work, if able, for their benefits.

CWEP administrators indicated that the program had helped prepare some participants to find employment through such factors as new job skills, a current work history, better work attitudes and habits, and improved job-search skills. Some thought the program improved self-esteem and family relationships for some participants. Several administrators said CWEP failed to help many recipients because it

is insufficiently equipped to deal with such problems as inability to read or write, inadequate social skills, poor hygiene, depression, and chemical dependency.

Although it is important to know the effect of CWEP on the ability of participants to find employment, adequate data for estimating this effect are unavailable. Data from six CWEP counties show that among 367 individuals completing CWEP orientation over April 1, 1983 - September 30, 1984, 41, or 11%, experienced AFDC case closures that were classified as being due to increased employment or earnings not attributable to a recall by a former employer. However, there are strong reasons to believe that this figure may either understate or overstate the proportion of CWEP participants experiencing increased employment or earnings as a result of their participation in the program. To properly estimate the effects of CWEP on the employment and earnings of participants would require a large-scale effort to collect and analyze data on CWEP participants and nonparticipants before and after the participants had been in the program.

CWEP participants performed a wide variety of useful work, not only in the more common areas of street, building, and grounds maintenance, but also on projects such as the development of recreational areas (including a city park, ball fields, and bicycle and snowmobile trails) and in capacities such as aides at schools, day care centers, and developmental achievement centers. The value of work done by participants in six counties was crudely estimated at about \$300,000 by multiplying the total number of hours of work by the minimum wage of \$3.35. This could be either more or less than the actual value of the work (the actual value being what the public would be willing to pay for the work); however, it exceeds the total program cost of roughly \$233,000 for the six counties concerned.

Another question of interest is the effect of CWEP on AFDC-UP caseload. CWEP may reduce caseload by increasing the ability of participants to find employment or, if the work assignment is mandatory, by making the option of being on welfare less attractive than otherwise. However, CWEP may increase the likelihood of being on welfare for individuals who would value the opportunity to do something in return for their benefits or would enjoy the work. A statistical analysis that controlled for factors other than CWEP affecting AFDC-UP caseload failed to produce evidence that CWEP had affected this caseload.

In conclusion, Itasca County has demonstrated that CWEP is feasible on a large scale and the other counties have shown that it is feasible on a smaller scale. However, to determine feasibility in other localities, several factors must be considered, including labor market conditions, types and numbers of available worksites, proximity of worksites to participants, and participant

characteristics such as skills and attitudes.

Whether CWEP is cost effective is less clear. While the value of work performed was estimated to exceed total program cost in six counties in the manner previously indicated, it is uncertain what the public would be willing to pay for such work. Finally, whether CWEP affects caseload size remains unknown.

Appendix A

MINNESOTA CWEP STATUTE

Minnesota Statutes section 256.737 as amended April 19, 1984:

6           Sec. 22. Minnesota Statutes 1983 Supplement, section  
7 256.737, is amended to read:  
8           256.737 [COMMUNITY WORK EXPERIENCE PROGRAM.]  
9           In order that persons receiving aid under this chapter may  
10 be assisted in achieving self-sufficiency by enhancing their  
11 employability through meaningful work experience and training  
12 and the development of job search skills, the commissioner of  
13 public welfare may ~~establish~~ continue the pilot community work  
14 experience demonstration programs that were approved by January  
15 1, 1984. No new pilot community work experience demonstration  
16 programs may be established. The commissioner shall: (a)  
17 assist counties in the design, implementation, and evaluation of  
18 these demonstration programs; (b) promulgate, in accordance with  
19 chapter 14, temporary rules necessary for the implementation of  
20 this section, except that the time restrictions of section 14.35  
21 shall not apply and the rules may be in effect until the  
22 termination of the demonstration programs; and (c) seek any  
23 federal waivers necessary for proper implementation of this  
24 section in accordance with federal law. The commissioner shall  
25 prohibit use of participants in the programs to do work that was  
26 part or all of the duties or responsibilities of an authorized  
27 public employee position established as of January 1, 1983. The  
28 exclusive bargaining representative shall be notified no less  
29 than 14 days in advance of any placement by the community work  
30 experience program. Concurrence with respect to job duties of  
31 persons placed under the community work experience program shall  
32 be obtained from the appropriate exclusive bargaining  
33 representative. The appropriate oversight committee shall be  
34 given monthly lists of all job placements under a community work  
35 experience program.  
36           Projects shall end no later than June 30, ~~1984~~ 1985, and a  
preliminary report shall be made to the legislature by February  
2 15, ~~1984~~ 1985, on the feasibility of permanent implementation  
3 and on the cost effectiveness of each of the demonstration  
4 programs.

## Appendix B

### FEDERAL CWEP REGULATIONS

Regulations effective October 1, 1983 appear first, followed by amendments effective October 1, 1984.

Code of Federal Regulations, Title 45, Part 238, Effective October 1, 1983

#### **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 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. Participants must be reimbursed for amounts not to exceed \$25 for reasonable necessary expenses (as defined by the State) directly related to participation in the programs. Allowable costs to operate CWEP (see Subpart D) are matched by the Feder-

al government at the AFDC administrative match level (50%).

##### **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:

**§ 238.16**

**Title 45—Public Welfare**

(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.

(b) States must provide reimbursement for transportation and other costs 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 \$25 per month, per participant. (See Subpart D for FFP requirements.)

**§ 238.18 Participant protection.**

States may provide worker's compensation or other comparable protection for their CWEP participants. The cost of this protection shall be considered an administrative expense and matched accordingly.

**§ 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.

(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]

**§ 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 requirement 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 and non-profit organizations may be sponsors.

##### § 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 (as identified in the State plan) are reasonably necessary and directly related to participation in CWEP not in excess of \$25 per month per participant.

##### § 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.

**I. Amendments to Code of Federal Regulations, Title 45, Part 238, Effective October 1, 1984 (from Federal Register, Vol. 49, No. 176, September 10, 1984)**

**PART 238—COMMUNITY WORK EXPERIENCE PROGRAM**

Part 238 of Chapter II, title 45, Code of Federal Regulations is amended as set forth below:

12. Section 238.01 is revised to read as follows:

**§ 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%).

13. Section 238.16 is revised to read as follows:

**§ 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.)

14. Section 238.18 is revised to read as follows:

**§ 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.

15. Section 238.20 is amended by adding a new paragraph (e) to read as follows:

**§ 238.20 Participation requirements.**

(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.

16. Section 238.50 is revised to read as follows:

**§ 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.

17. Section 238.60 is revised to read as follows:

**§ 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.

## Appendix C

### MINNESOTA CWEP RULES

Minnesota Rules, parts 9505.1050 [Emergency] through 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 commisisoner 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 9 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 9505.1061 [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 D

### PARTICIPANT QUESTIONNAIRE

#### I. Version for Those on Mandatory Work Assignments at Time of Survey (Version for Those on Voluntary Work Assignments at Time of Survey Was the Same Except With a Different Preamble)

CWEP PARTICIPANT QUESTIONNAIRE: VERSION 1,  
FOR INDIVIDUALS NOW ON MANDATORY WORK ASSIGNMENTS

NOVEMBER 1984

Thank you for coming to fill out this questionnaire on the Community Work Experience Program (CWEP). The information you and others provide will be an important contribution to a report on how CWEP has been working. This report, being written by the Minnesota Department of Human Services, will help the State Legislature decide whether to extend CWEP beyond June 30, 1985.

No one will know how you answer the questions, because your questionnaire will not be identified as yours. When you complete the questionnaire, seal it in the envelope you have received, and give the envelope to the CWEP oversight committee member who is at this session. He or she will mail the sealed envelopes directly to the Minnesota Department of Human Services, so that no one in your county will see your completed questionnaire.

In order to receive your eight-hour work-assignment credit, you must return the sealed envelope containing your completed questionnaire to the oversight committee member and make sure that the CWEP coordinator from your county, who is at this session, records your name when you do so.

If you would like to see the results of this survey along with a summary of the report, ask the oversight committee member collecting the questionnaires for one of the postcards he or she has, write your name and address on the back, and drop it in the mail. The postcards are already stamped and addressed to the Minnesota Department of Human Services.

Please be careful in answering the questions and try to answer all of them.

\* \* \*

1. What is your age? \_\_\_\_\_
2. Sex?  Male  Female
3. How many years of education did you complete before participating in CWEP? Count the last year of high school or a high-school equivalency certificate (GED) as 12 years, one year of college as 13 years, etc. Do not count trade or vocational school or an apprenticeship program. \_\_\_\_\_
4. Did you ever complete a program at a trade or vocational school before participating in CWEP?  
 Yes  No  
If so, what occupation or type of work was the program for? \_\_\_\_\_  
\_\_\_\_\_

5. Please supply the following information about the highest-paying job you ever had before participating in CWEP:

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

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

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

How long did you have this job? If you ever worked part-time at this job while in CWEP, only count the period before you were in CWEP. \_\_\_\_\_

6. Is the job referred to in #5 the longest job you ever had before participating in CWEP?  Yes  No

If not, please supply the following information about the longest job you ever had before participating in CWEP:

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

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

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

How long did you have this job? If you ever worked part-time at this job while in CWEP, only count the period before you were in CWEP. \_\_\_\_\_

7. When was your CWEP orientation (where someone explained to you how CWEP works)? Indicate month and year. \_\_\_\_\_

8. When did you begin your first CWEP work assignment (month and year)?  
\_\_\_\_\_

9. How many different CWEP worksites have you been at? \_\_\_\_\_

10. For the two worksites you have been at the longest, please supply the following information, starting with the worksite you have been at the longest. A worksite may be, for example, a school, social service agency, maintenance shop, or park or other natural resource area.

Worksite you  
have been at  
the longest

Worksite you have  
been at the second  
longest

Type of worksite: \_\_\_\_\_

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

Worksite you  
have been at  
the longest

Worksite you have  
been at the second  
longest

Number of other  
CWEP participants  
at worksite:

\_\_\_\_\_

\_\_\_\_\_

Average number of  
hours worked per  
month:

\_\_\_\_\_

\_\_\_\_\_

Length of time  
at worksite:

\_\_\_\_\_

\_\_\_\_\_

11. In general, how have you been treated by your worksite supervisor(s)?

a. \_\_\_ With respect      \_\_\_ With disrespect

What makes you think so? \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

b. \_\_\_ Fairly      \_\_\_ Unfairly

What makes you think so? \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

12. What else has your worksite supervisor(s) done that you have liked or found helpful?

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

13. What else has your worksite supervisor(s) done that you have disliked or found harmful?

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

14. Have you learned any new skills through your work in CWEP?

\_\_\_ Yes      \_\_\_ No

If so, please list them and indicate whether you think each one is useful for finding a regular job:

<u>New skills:</u>	<u>Useful for finding a regular job?</u>
a. _____ _____	___ Yes ___ No ___ Not sure
b. _____ _____	___ Yes ___ No ___ Not sure
c. _____ _____	___ Yes ___ No ___ Not sure

15. Do you think your work in CWEP has helped prepare you to find employment other than by teaching you new skills? \_\_\_ Yes \_\_\_ No \_\_\_ Not sure

If so, how? If not, why not? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

16. Has your CWEP work prevented you from spending as much time searching for employment as you would otherwise? \_\_\_ Yes \_\_\_ No \_\_\_ Not sure

If so, how much more time per week would you spend looking for employment if you were not working in CWEP? \_\_\_\_\_ more hours per week

17. Have you been reimbursed for all costs arising because of your CWEP work? \_\_\_ Yes \_\_\_ No

If not, please supply the following information for each cost involved:

<u>Type of cost</u>	<u>Monthly amount of cost arising because of CWEP</u>	<u>Monthly reimbursement</u>
a. _____ _____	\$ _____	\$ _____
b. _____ _____	\$ _____	\$ _____
c. _____ _____	\$ _____	\$ _____

18. How has your CWEP work made you feel about being on welfare?

Much Better

Somewhat better

No different

Somewhat worse

Much worse

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

19. Has your CWEP work made you respect yourself any more or less?

Much more

Somewhat more

No more or less

Somewhat less

Much less

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

20. Has your CWEP work 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? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

21. What else about your CWEP work experience have you liked or found helpful?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

22. What else about your CWEP work experience have you disliked or found harmful?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

23. Please check the appropriate statement about your work in CWEP:

- It has been required the whole time.  
 It has been voluntary the whole time.  
 It is now required, but was voluntary for some of the time.  
 It is now voluntary, but was required for some of the time.  
 Not sure

24. Do you think welfare recipients should be required to work in return for their welfare benefits, provided that they are able-bodied and do not need to take care of others, such as young children or aged parents?

Yes  No  Not Sure

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

II. Version for Those No longer on Work Assignments at Time of Survey

CWEP PARTICIPANT QUESTIONNAIRE: VERSION 3,  
FOR INDIVIDUALS PREVIOUSLY BUT NOT CURRENTLY ON WORK ASSIGNMENTS

NOVEMBER 1984

The Minnesota Department of Human Services is preparing a report to the State Legislature on how the Community Work Experience Program (CWEP) has been working. The legislature will use the report in deciding whether to extend the program beyond June 30, 1985. For part of the report, we would like to know what you and others who have participated in CWEP think about the program. We would appreciate if you could help by filling out this questionnaire and returning it to us in the enclosed stamped, addressed envelope.

No one will know how you answer the questions, because this questionnaire will not be identified as yours.

If you would like to see a copy of the survey results and report summary, fill in your name and address on the back of the enclosed stamped postcard and drop it in the mail. To keep your questionnaire anonymous, do not put the card in the envelope.

If you decide to fill out the questionnaire, we would appreciate it if you return it to us soon, because the report has to be finished soon. Please be careful in answering the questions and try to answer all of them.

Thank you.

\* \* \*

1. What is your age? \_\_\_\_\_
2. Sex?  Male  Female
3. How many years of education did you complete before participating in CWEP? Count the last year of high school or a high-school equivalency certificate (GED) as 12 years, one year of college as 13 years, etc. Do not count trade or vocational school or an apprenticeship program. \_\_\_\_\_
4. Did you ever complete a program at a trade or vocational school before participating in CWEP?  
 Yes  No  
If so, what occupation or type of work was the program for? \_\_\_\_\_  
\_\_\_\_\_

5. Please supply the following information about the highest-paying job you ever had before participating in CWEP:

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

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

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

How long did you have this job? If you ever worked part-time at this job while in CWEP, only count the period before you were in CWEP. \_\_\_\_\_

6. Is the job referred to in #5 the longest job you ever had before participating in CWEP?  Yes  No

If not, please supply the following information about the longest job you ever had before participating in CWEP:

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

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

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

How long did you have this job? If you ever worked part-time at this job while in CWEP, only count the period before you were in CWEP. \_\_\_\_\_

7. When was your CWEP orientation (where someone explained to you how CWEP works)? Indicate month and year. \_\_\_\_\_

8. When did you begin your first CWEP work assignment (month and year)? \_\_\_\_\_

9. How many different CWEP worksites were you at? \_\_\_\_\_

10. For the two worksites you were at the longest, please supply the following information, starting with the worksite you were at the longest. A worksite could have been, for example, a school, social service agency, maintenance shop, or park or other natural resource area.

Worksite you were at  
the longest

Worksite you were at the  
second longest

Type of worksite: \_\_\_\_\_

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

\_\_\_\_\_

\_\_\_\_\_

Worksite you were  
at the longest

Worksite you were at  
the second longest

Number of other  
CWEP participants  
at worksite:

\_\_\_\_\_

\_\_\_\_\_

Average number of  
hours worked per  
month:

\_\_\_\_\_

\_\_\_\_\_

Length of time  
at worksite:

\_\_\_\_\_

\_\_\_\_\_

11. In general, how were you treated by your worksite supervisor(s)?

a. \_\_\_ With respect      \_\_\_ With disrespect

What makes you think so? \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

b. \_\_\_ Fairly      \_\_\_ Unfairly

What makes you think so? \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

12. What else did your worksite supervisor(s) do that you liked or found helpful?

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

13. What else did your worksite supervisor(s) do that you disliked or found harmful?

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

14. Did you learn any new skills through your work in CWEP?

\_\_\_ Yes      \_\_\_ No

If so, please list them and indicate whether you think each one is useful for finding a regular job:

<u>New skills:</u>	<u>Useful for finding a regular job?</u>		
a. _____ _____	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not sure
b. _____ _____	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not sure
c. _____ _____	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not sure

15. Did you ever obtain a job at least partly with the help of your CWEP work experience or any skills learned in this work experience?  Yes  No

If so, continue to question #16.

If not, go to #17.

16. a. Please describe how your CWEP work experience helped you get the job referred to in #15.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

b. Please supply the following information about this job:

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

Starting wage: \$ \_\_\_\_\_ per \_\_\_\_\_

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

c. Go to #18.

17. Do you think your CWEP work experience helped prepare you to find employment other than by teaching you new skills?  Yes  No  Not sure

If so, how? If not why not? \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

18. Did your CWEP work prevent you from spending as much time searching for employment as you would have spent otherwise?  Yes  No  Not sure

If so, how much more time per week would you have spent looking for employment if you had not been working in CWEP? \_\_\_\_\_ more hours per week

19. Were you reimbursed for all costs arising because of your CWEP work?

Yes  No

If not, please supply the following information for each cost involved:

<u>Type of cost</u>	<u>Monthly amount of cost arising because of CWEP</u>	<u>Monthly Reimbursement</u>
a. _____ _____	\$ _____	\$ _____
b. _____ _____	\$ _____	\$ _____
c. _____ _____	\$ _____	\$ _____

20. How did your CWEP work make you feel about being on welfare?

- Much better
- Somewhat better
- No different
- Somewhat worse
- Much worse

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

21. Did your CWEP work make you respect yourself any more or less?

Much more

Somewhat more

No more or less

Somewhat less

Much less

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

22. Did your CWEP work make 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? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

23. What else about your CWEP work experience did you like or find helpful?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

24. What else about your CWEP work experience did you dislike or find harmful?

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25. Please check the appropriate statement about your work in CWEP:

It was required the whole time.

It was required part of the time and voluntary part of the time.

It was voluntary the whole time.

Not sure

26. Do you think welfare recipients should be required to work in return for their welfare benefits, provided that they are able-bodied and do not need to take care of others, such as young children or aged parents?

Yes       No       Not sure

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

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## NOTES

1. See Code of Federal Regulations, title 45, sections 238.14 and 224.20.
2. U.S. General Accounting Office, "CWEP's Implementation Results to Date Raise Questions About the Administration's Proposed Mandatory Workfare Program." Washington: U.S. General Accounting Office, April 2, 1984.
3. An AFDC unemployed parent is the parent designated as the principle wage earner in a two-parent family receiving AFDC.
4. See Code of Federal Regulations, title 45, section 224.20.
5. See Minnesota Rules, part 9505.1054 [Emergency], subpart 3 (Appendix C).
6. Before October 1, 1984, participant reimbursement qualifying for Federal reimbursement (at 50%) was limited to \$25 per month for all items.
7. Source: Minnesota Department of Economic Security.
8. Ideally, data for all months -- not just quarter-end months -- should be used here, but only quarter-end months were used in order to reduce the reporting burden on the counties.
9. As indicated previously, Federal regulations effective October 1, 1984 provide Federal reimbursement at 50% for reimbursements to participants for all necessary transportation expenses, up to \$160 per month for child care, and up to \$10 per month for other expenses.
10. If an individual gave a verbal response to this question without checking "yes," "no," or "not sure," the answer was categorized as an unqualified "yes" or "no" if appropriate, and otherwise as "not sure."
11. Among other questions, the county CWEP administrators were asked, "To your knowledge, how many CWEP participants in your county obtained (1) subsidized and (2) unsubsidized jobs before October 1, 1984 at least partly because of working in CWEP?" The administrators were generally unable to answer this question with confidence.
12. A result is said to be statistically significant if the likelihood that it could have arisen from random variation in the data in the absence of an underlying effect is smaller than some specified level, typically .05 or .01. The .05 level was used in the analysis.