

STUDY OF SANCTIONS AMONG CalWORKs PARTICIPANTS IN THE COUNTY OF LOS ANGELES: Who, When, and Why?



**COUNTY OF LOS ANGELES
Chief Administrative Office
Service Integration Branch**

Research and Evaluation Services

Manuel H. Moreno, Principal Investigator

Halil Toros

Vandana Joshi

Max Stevens

Farhad Mehrtash

Julie Beardsley

Nancy Salem

and

John Horton

University of California, Los Angeles

Linda Shaw

California State University, San Marcos

David E. Janssen, Chief Administrative Officer

Lari Sheehan, Assistant Administrative Officer

Constance S. Sullivan, Assistant Division Chief

March 2005

**Prepared for:
County of Los Angeles Department of Public Social Services**

PREFACE

The research conducted for this report was undertaken as a result of recommendations made by the Commission for Public Social Services regarding the need for systematic information on welfare sanctions and the sanctioned population in the County of Los Angeles. The proportion of sanctioned welfare participants in the County of Los Angeles over the last two years has been comparable to the sanction rate for the State of California as a whole. Nevertheless, community advocates and policymakers alike have expressed interest in lowering the sanction rate in the County of Los Angeles and enhancing participants' capacity to comply with Welfare-to-Work requirements. In addition, there is ongoing interest in the extent to which sanctions actually encourage compliance. These issues can only be addressed with rigorous research of the kind that was carried out in preparing this report.

Several different sources of data and distinct but complementary methods of social research were used to generate this study's findings. Statistical techniques were employed to analyze administrative records and a staff survey. In addition, focus group interviews were conducted and analyzed for the purpose of obtaining qualitative data on how perceptions of the sanctions process shape the actions taken by both Welfare-to-Work participants and caseworkers. The use of qualitative and quantitative methods in concert with each other enables this report to provide well-rounded information on sanctions, sanctioned participants, and the employees who manage their cases.

This study covers the period from April 2002 to February 2004. After describing the sanctions policy environment in the County of Los Angeles, this report goes on to identify the County's sanctioned population, analyze the County's sanction rates, and look at the amount of time it takes participants to become sanctioned. This report also examines the factors that increase and decrease the probability of both being sanctioned and making a return to compliance after a sanction has been issued. Focus group data reveals many of the challenges that both Welfare-to-Work participants and caseworkers face in the course of engaging with sanctions policy, and staff survey data sheds light on how issues such as caseload size, work experience and the way in which sanction policy is implemented by the GAIN Service Workers affect the frequency of sanctions. The final chapter makes policy recommendations based on this report's quantitative and qualitative findings.

Manuel H. Moreno, Ph.D.
Principal Investigator

ACKNOWLEDGEMENTS

The authors wish to thank the many people who helped make this report possible. Dr. Henry Felder, Phil Ansell and Vance Martin at the Los Angeles County Department of Public Social Services provided valuable support, insight and feedback on the project. Gail Dershewitz, Deborah Gotts, Dr. Michael Bono, Mayindi Mokwala, Gerardo Chiquito, and many others at the Los Angeles County Department of Public Social Services who provided valuable information, data and technical and program knowledge. Special thanks should be given to the GAIN Service Supervisors, GAIN Service Workers and participants who took part in the focus group interviews conducted for this study. We would also like to give special acknowledgement to Dr. Leonard Schneiderman, Yolanda Arias, Dr. Paul Ong, and Kate Meiss, all of whom are members of the CalWORKs Advisory Group, for their insightful and constructive comments on earlier drafts of this report. In addition, Jacob Klerman of the RAND Corporation provided comments on an earlier draft of this report that helped us sharpen and improve our analyses. Petra Gonzalez provided proofreading assistance. Finally, special thanks to Mary Mar for compiling this report.

TABLE OF CONTENTS

Executive Summary	xi
Overview	xi
Principal Findings.....	xii
The Next Report.....	xxii
I. Introduction	1
Policy Background: Welfare Reform and Sanctions.....	1
Sources and Methods	2
The State of Knowledge on Sanctions	3
Methodological Issues.....	4
Reported Sanction Rates	5
Barriers to Program Compliance	6
Background Characteristics of Sanctioned Populations.....	7
Outcomes Associated With Sanctions	8
The Chapters of This Report.....	10
Endnotes	10
II. Sanctions Policy	14
What Are Sanctions?	14
The Theory Behind Sanctions.....	15
Initial Processes	15
How Are Sanctions Implemented in the County of Los Angeles?	16
When a Participant is Noncompliant	17
Imposition of Sanctions	18
Curing a Sanction.....	19
Fair Hearings and Other Remedies.....	19
Conclusion	20
Endnotes	20

III. Who Are the County of Los Angeles' Sanctioned CalWORKs	
Participants and What Are Their Sanction Rates?	21
Study Populations	21
Demographic Composition and Characteristics of Sanctioned Participants	21
Demographic Characteristics of Never Sanctioned Noncompliant and Always Compliant Participants	24
Participation in Welfare-to-Work Activities	26
Employment Experience and Earnings Among Sanctioned and Non-Sanctioned Participants	29
What Are the Sanction Rates of CalWORKs Participants?	31
Cohort Sanction and Curing Rates	35
Sanction Rates in GAIN Regions and RITE Program	39
Length of Time to First Sanction and Duration of Sanctions	42
Multiple Sanctions	43
Conclusion	44
Endnotes	45
IV. Factors Associated With GAIN Sanctions: An Analysis of	
Administrative Data	46
Overview	46
Regression Models	46
GAIN Participants Completing Orientation	47
Predicting the Completion of Orientation	49
How Long Does It Take to Be Sanctioned?	51
Model Predicting the Probability of Being Sanctioned	52
The Return to Compliance After Being Sanctioned	55
Participants Entering Noncompliance but Returning to Compliance Before Being Sanctioned	60
Conclusion	62
Endnotes	64

V. In Their Own Words: Participants Talk About Noncompliance and Sanctions	65
How to Interpret Focus Group Methods and Findings	65
How the Life Situations of Participants Influenced Their Decisions Not to Comply	66
Program Barriers to Compliance	70
Do the Threat of Sanctions and Sanctions Secure Compliance With GAIN Regulations?	75
Conclusion	78
VI. Case Workers and Sanctions	79
Survey Data Collection	79
Number of GAIN Participants Recommended for Sanctions in the Past Six Months	81
Number of GAIN Sanctions Lifted or Cured Between June 2003 and July 2004	82
Descriptive Analysis of Staff Survey Questions	83
Implementing Sanction Policy	84
Why Do Participants Fail to Show Up for Orientation?	85
Predicting Sanctions	90
Model Predicting Return to Compliance	91
Conclusion	93
VII. In Their Own Words: GSWs Talk About Sanctioning	94
What Is a Focus Group and How to Interpret Its Methods and Findings?	94
Autonomy and Flexibility in Making Decisions	95
Two Strategies for Using Sanctions to Achieve Compliance	97
Sanctions Strategies Depend on “Getting a Feel for What the Person Is Trying to Do”	100
The Effect of the Work Situation on Casework	103
Conclusion	108

VIII. Conclusions and Next Steps	109
The Complementary Relationship Between Quantitative and Qualitative Analysis.....	109
Policy Recommendations.....	110
The Next Report.....	113
Appendices	
Appendix A: Employee Survey on Sanctions.....	114
Appendix B: Technical Appendix Methodology	127
B.1 Selection of Study Groups (Administrative Data)	127
B.2 Sample Selection of Focus Group Participants	127
B.3 Data Sources	128
B.4 Descriptive and Multivariate Tables.....	128
Appendix C: Focus Group Methodology	135
C.1 The Purposes and Advantages of a Qualitative Methodology	135
C.2 The Design and Conduct of Focus Group Methodology	136
C.3 Focus Group Conduct.....	138
C.4 Focus Group Questions for Participants	139
C.5 Focus Group Questions for GSWs.....	143
C.6 Recommendations	145
Appendix D: GSWs’ Recommendations for Encouraging Compliance and Reducing Sanctions	146
Appendix E: CalWORKs Evaluation Advisory Group.....	150
Appendix F: Glossary	151
References	154

Tables and Figures

Tables

3.1	Demographic Characteristics of Sanctioned and Never Sanctioned GAIN Participants, April 2002 – February 2004	23
3.2	Demographic Characteristics of Compliant and Noncompliant GAIN Participants, April 2002 – February 2004	25
3.3	Last GAIN Activity Attended or Scheduled Prior to a Sanction or Noncompliance Incidence, April 2002 – February 2004.....	27
3.4	Participation in Welfare-to-Work Activities Among Sanctioned and Non-Sanctioned GAIN Participants, April 2002 – February 2004.....	29
3.5	Employment and Earnings of Sanctioned and Non-Sanctioned GAIN Participants	30
3.6	Mandatory Welfare-to-Work Participants and Sanction Rates in the State of California and Its Five Most Populous Counties	34
4.1	Probability of Completing Orientation April 2002 – February 2004	50
4.2	Estimated Probability of Being Sanctioned Between April 2002 and February 2004.....	53
4.3	Probability of Leaving the CalWORKs Program or Returning to Compliance Versus Staying Sanctioned Between April 2002 and February 2004.....	58
4.4	Probability of Being Noncompliant but Not Being Sanctioned or Always Remaining Compliant Compared With Being Sanctioned Between April 2002 and February 2004.....	61
6.1	Implementation of Sanction Policy by GAIN Staff Workers and Number of Participants Sanctioned or Recommended for Sanctions in the Past Six Months.....	87
6.2	Probability of Sanctioning 11 or More Participants in the Past Six Months (Between January – June 2004)	91
6.3	Probability of Curing 30 or More Sanctions in the Past Year (Between July 2003 – June 2004).....	92
B.1	Descriptive Characteristics of Participants Completing and Not	

	Completing Orientation	129
B.2	Factors Predicting the Probability of Completing Orientation.....	130
B.3	Descriptive Characteristics of Sanctioned and Never Sanctioned Participants	131
B.4	Factors Predicting the Probability of Being Sanctioned	132
B.5	Factors Predicting the Probability of Returning to Compliance	133
B.6	Factors Predicting the Probability of Being Noncompliant or Always Compliant vs. Being Sanctioned	134

Figures

1	Sanction Status of Participants Who Registered in GAIN Between April 2002 and September 2003	xii
2	Demographic Characteristics of Sanctioned and Never Sanctioned Participants Entering the GAIN Program Between April 2002 and September 2003	xiii
3	Monthly Sanction Rates of Welfare Recipients in California and County of Los Angeles, April 2002 – February 2004.....	xiv
4	Proportion of Participants Sanctioned Over an 18-Month Period Among a Cohort Entering GAIN Between June and November 2002....	xv
5	Length of Time Between GAIN Enrollment and the First Sanction Among Participants Entering Between June and November 2002.....	xvi
6	Program Status of GAIN Participants One Year After Being Sanctioned	xviii
7	Number of Months in Sanction Status Among GAIN Participants Sanctioned Between September 2002 and February 2003	xix
8	Reasons Why GAIN Participants Do Not Attend Orientation According to GSWs in DPSS Offices	xxi
9	Reasons GAIN Participants Do Not Attend Orientation According to GSWs in Contract Offices	xxi
3.1	Trend of Sanction Rate in the GAIN Program Between April 2002 and February 2004.....	32

3.2	Number of Mandatory and Sanctioned GAIN Participants Between April 2002 and February 2004.....	33
3.3	Monthly Sanction Rates of Welfare Recipients in California and County of Los Angeles, April 2002 – February 2004.....	35
3.4	Change in Program Status Among a Cohort of Participants Entering the GAIN Program Between June and November 2002	36
3.5	Sanction Incidence Rate Among a Cohort of Participants Entering the GAIN Program Between June and November 2002	37
3.6	Program Status Over Time (Cumulative) Among a Cohort of Participants Sanctioned Between September 2002 and February 2003.....	38
3.7	Monthly Change in Program Status Among a Cohort of Participants Sanctioned Between September 2002 and February 2003.....	38
3.8	Monthly Sanction Rate by GAIN Regions and RITE Offices Between April 2002 and February 2004.....	39
3.9	GAIN Sanction Rates in February 2004 by GAIN Regions and RITE Program.....	41
3.10	Time Between GAIN Enrollment and the First Sanction Among Participants Enrolled Between April 2002 and February 2004	42
3.11	Number of Months Remained Sanctioned Among GAIN Participants Sanctioned Between September 2002 and February 2003.....	43
4.1	Change in Program Status of GAIN Participants Between April 2002 and February 2004	47
4.2	Change in Program Status of GAIN Participants Between April 2002 and February 2004 by Attendance in Orientation	48
4.3	Length of Time It Took Sanctioned Participants to Be Sanctioned Between April 2002 and February 2004.....	51
4.3	Percent Sanctioned Participants Returning to Compliance	

	Between April 2002 and February 2004.....	56
4.5	Percent Sanctioned Participants Returning to Compliance	
	Between April 2002 and February 2004 by Orientation Status	57
4.6	Proportion of Compliant and Noncompliant Participants Completing	
	Orientation Between April 2002 and February 2004	60
6.1	Survey Response Rates by GAIN Regions and RITE Program.....	80
6.2	Education Level of GAIN Employees.....	80
6.3	Years Worked at Current Job Level.....	81
6.4	Number of GAIN Participants Recommended for Sanctions	
	in the Past Six Months by GAIN Service Workers in DPSS and	
	Contract Offices	82
6.5	Number of Sanctions Cured Between July 2003 and	
	July 2004.....	83

EXECUTIVE SUMMARY

Overview

In September 2003, the County of Los Angeles' Commission for Public Social Services submitted a report to the Board of Supervisors citing the need for information on welfare participants who have portions of their cash assistance reduced for failure to follow Welfare-to-Work program requirements. These financial penalties for noncompliance are customarily referred to as "sanctions." Sanctions are a key component of the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA), the welfare reform bill that was signed into law in 1996. PRWORA replaced Aid to Families with Dependent Children (AFDC) with the Temporary Aid to Needy Families (TANF) program. To comply with TANF requirements, California passed the California Work Opportunity and Responsibility to Kids (CalWORKs) program. The Welfare-to-Work component of the County of Los Angeles' CalWORKs program is called Greater Avenues for Independence (GAIN), and sanctions are imposed on GAIN participants when they fail to comply with GAIN requirements.

Recognition of the need for information on sanctioned GAIN participants emerged when the Public Social Services Commission's Committee on Review and Evaluation of CalWORKs suggested that sanctioned participants are frequently unable to comply with program requirements because they do not receive needed supportive services for substance abuse, domestic violence and mental health problems. Discovery of this potential problem was the result of documents and testimony received from the Departments of Public Social Services (DPSS), Mental Health (DMH), Health Services (DHS), and Community and Senior Services (DCSS).

In response to the Commission's request for information on sanctions and the County's sanctioned population, DPSS prepared a "Departmental Action Plan to Enhance Delivery of Specialized Supportive Services," and presented the plan to the Board of Supervisors on January 15, 2004. One of the items in the action plan stated DPSS' intention to produce the sanctions study requested by the Commission. The present study is the end product of this intention.

To produce this sanctions study, DPSS contracted with the Research and Evaluation Services (RES) Unit within the Chief Administrative Office's (CAO) Service Integration Branch (SIB). In keeping with the description of the study that DPSS provided to the Board in its letter of January 15, 2004, RES explores four general areas of inquiry: 1) Identifying the Sanctioned CalWORKs Population; 2) Factors Associated with being Sanctioned; 3) Return to Compliance among Sanctioned Participants; and 4) Relations Between GAIN Office Differences and Sanction Rates.

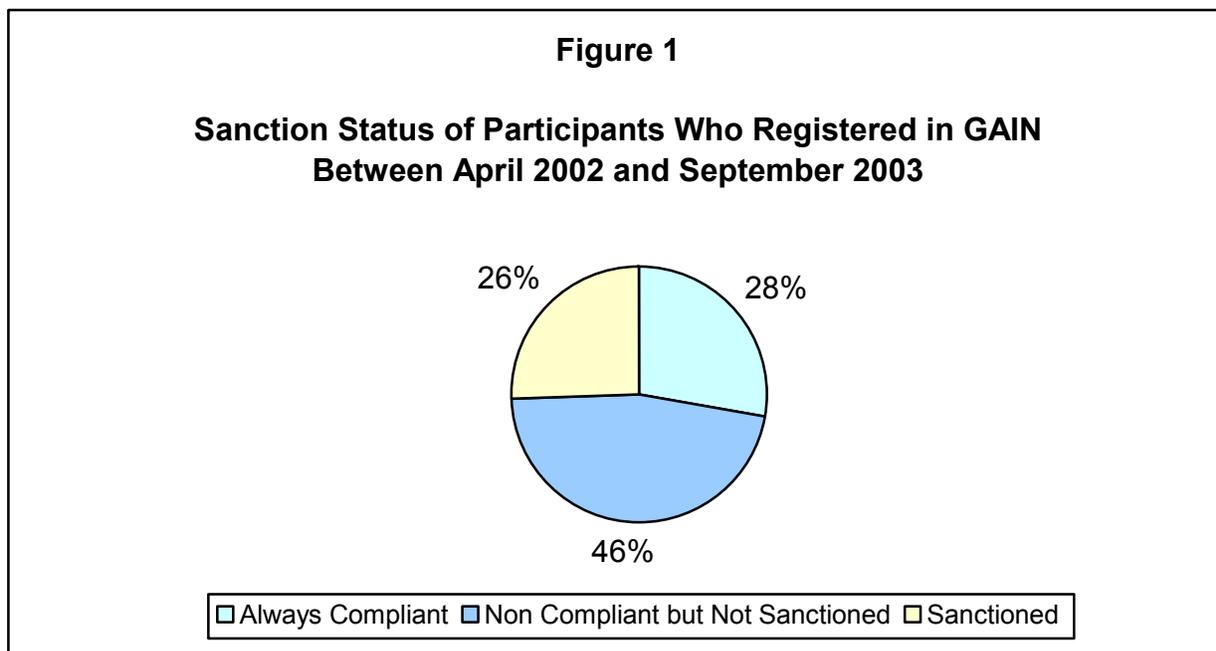
In order to adequately address these areas and, in turn, provide DPSS with policy-oriented information that can be used to improve service delivery and lower the incidence of sanctions, this report primarily looks at sanctions during the period from April 2002 to February 2004. The report chapters are organized in the following way:

Chapter 1, the study's introduction, presents the research questions that guide the remainder of the study and offers a review of some of the most important research that has been done to date on Welfare-to-Work sanctions. Chapter 2 provides an overview of sanctions policy and the sanctions process in the County of Los Angeles and links them to sanctions policy at the State and Federal levels. Chapters 3 through 7 contain the results of the empirical research that was conducted for this report (the key findings from these chapters are discussed below). Chapter 8, the study's conclusion, makes policy recommendations based on the findings presented in Chapters 3 through 7.

Principal Findings

Who Are the County's Sanctioned Participants?

Approximately one-fourth of the participants that registered in the GAIN program between April 2002 and September 2003 were sanctioned. Forty-six percent were noncompliant but were not sanctioned because they returned to compliance within 21 days, while 28 percent were always compliant (Figure 1).

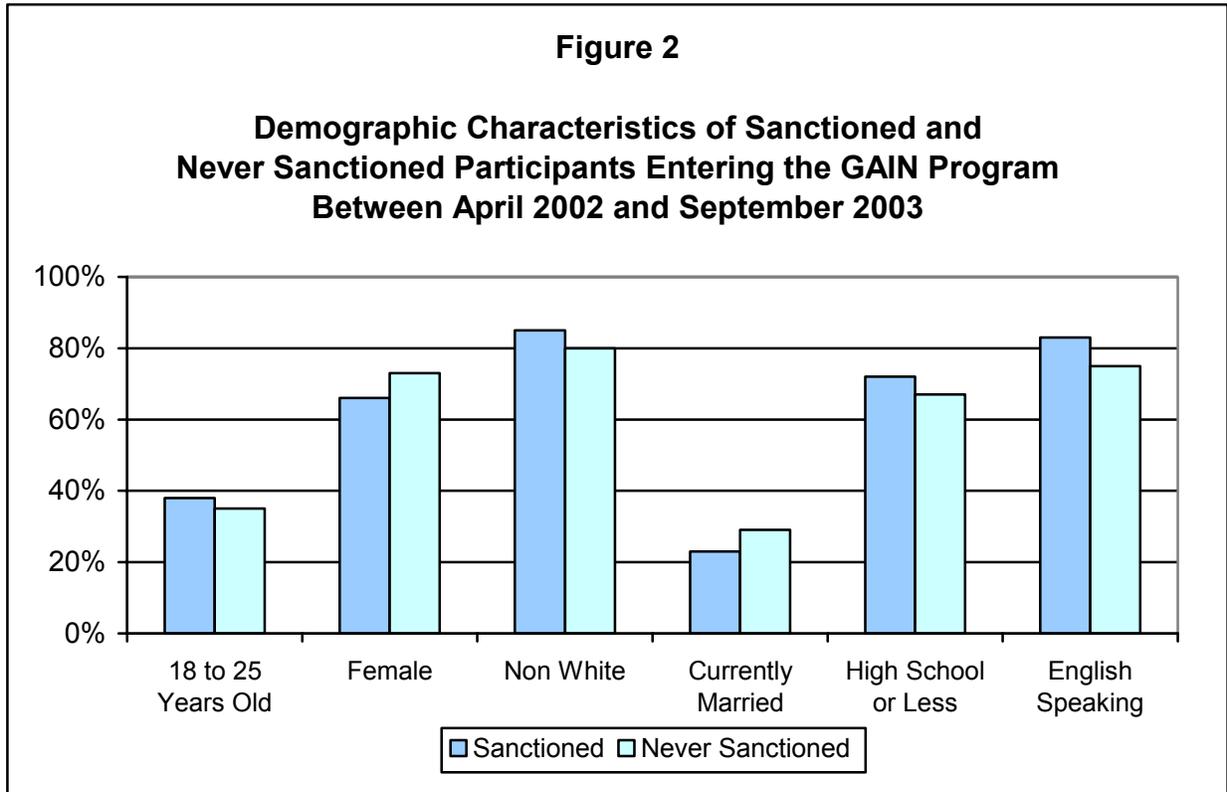


Source: DPSS; GEARS, 2002-2004, Cumulative Sanction File February 2004.

Note: The study sample included CalWORKs participants that entered the GAIN program between April 2002 and September 2003. The program status of these participants was tracked through February 2004.

The demographic characteristics of sanctioned and never-sanctioned participants examined in this study are quite similar. Between 35 and 38 percent of both sanctioned and never-sanctioned participants were between 18 to 25 years of age, less than a third were currently married, more than two-thirds had a high school diploma or less, and between 75 and 83 percent were English speaking participants (Figure 2).

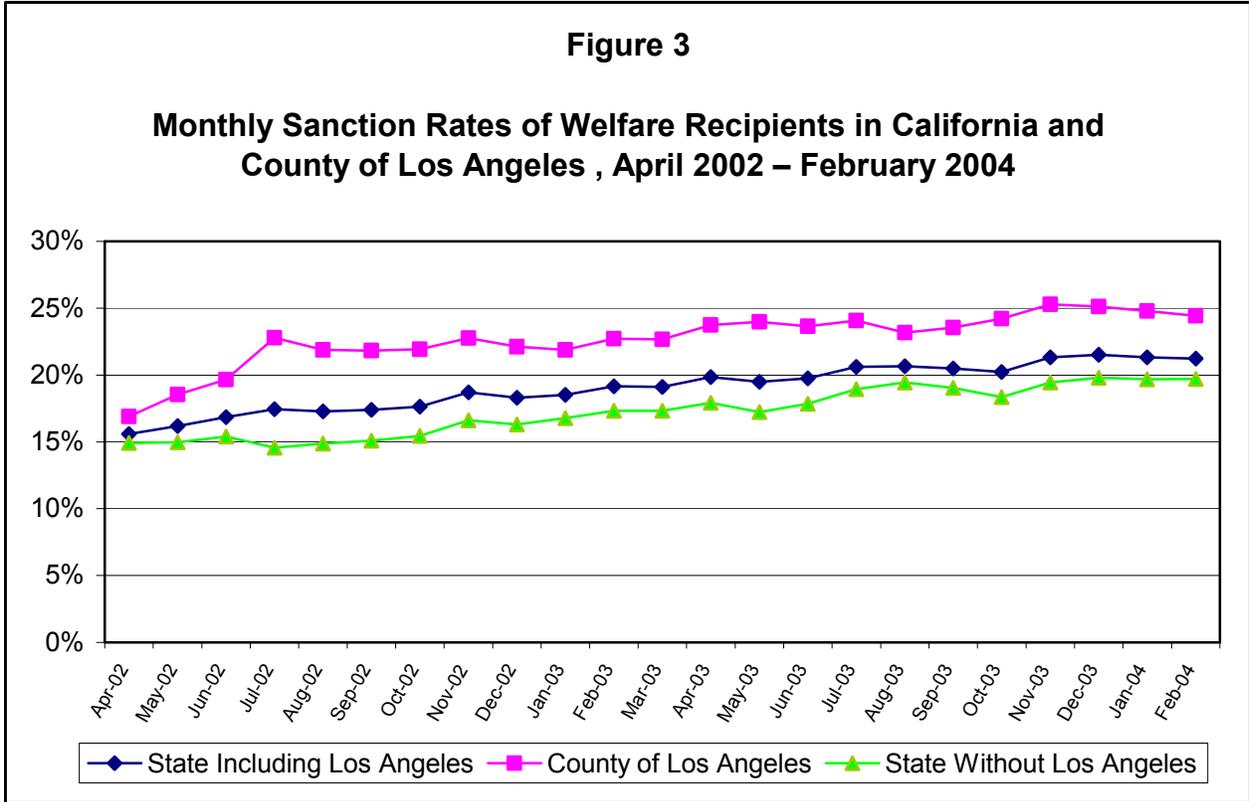
English speaking participants generally receive services from non-contract offices. These offices also report a higher sanction rate. Most of the non English-speaking participants are Asian immigrants and receive GAIN services through the Refugee/Immigrant Training and Employment (RITE) program which serves non-English and non-Spanish speaking participants. The sanction rate is generally lower in these offices.



Source: LEADER/GEARS 2002-2004

What Are the Monthly Sanction Rates?

The monthly sanction rate (defined as the number of sanctioned participants divided by the total number of enrolled participants including the sanctioned participants) of participants between April 2002 and February 2004 fluctuated between a low of 17 percent in April 2002 to a high of 24 percent in February 2004. At the same time, the sanction rate for the State grew from 16 to 21 percent. The increase in the monthly sanction rate for County of Los Angeles over the two-year period was largely due to a decline in the welfare caseload rather than an increase in the number of participants being sanctioned over time (Figure 3).



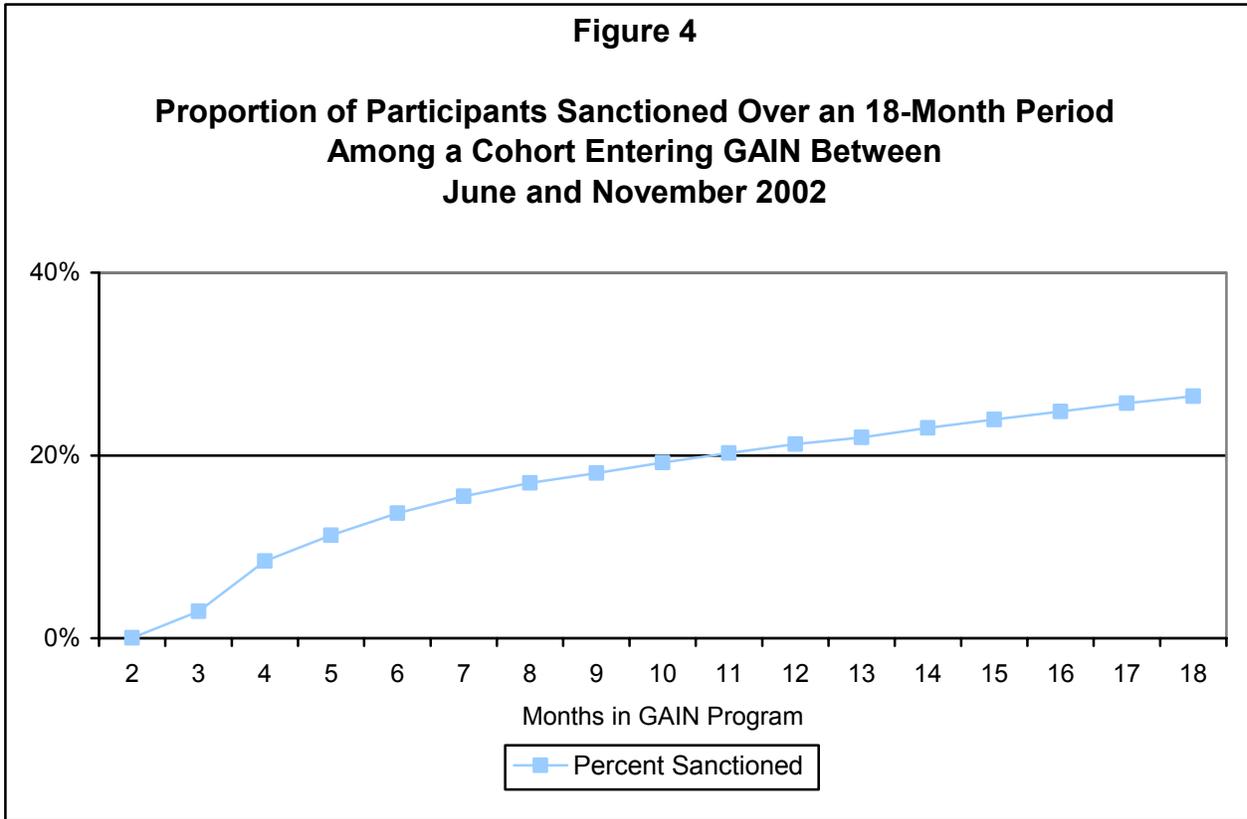
Source: California Department of Social Services, W25 and W25a Files.

How Many GAIN Participants Are Sanctioned Over Time?

Sanction rates are better understood by examining a group of participants entering the GAIN program in a given month and observing them over a period of time. Analysis of a group of participants entering the GAIN program for the first time between June and November 2002 showed that over an 18-month period the percentage of sanctioned participants increased at a higher rate in the earlier months and at a lower but stable rate thereafter (Figure 4).

For this group (cohort), the proportion of participants sanctioned over time increased from 3 percent in the third month to 14 percent in the sixth month. This was the cumulative sanction rate, i.e., in each month the sanctioned participants included participants who had been sanctioned in the previous months. By the end of the 18-month period, the cumulative sanction rate for the cohort was approximately 27 percent.

In general, approximately 25 percent of the participants in the cohort were at risk of being sanctioned within 18 months after entering the GAIN program.



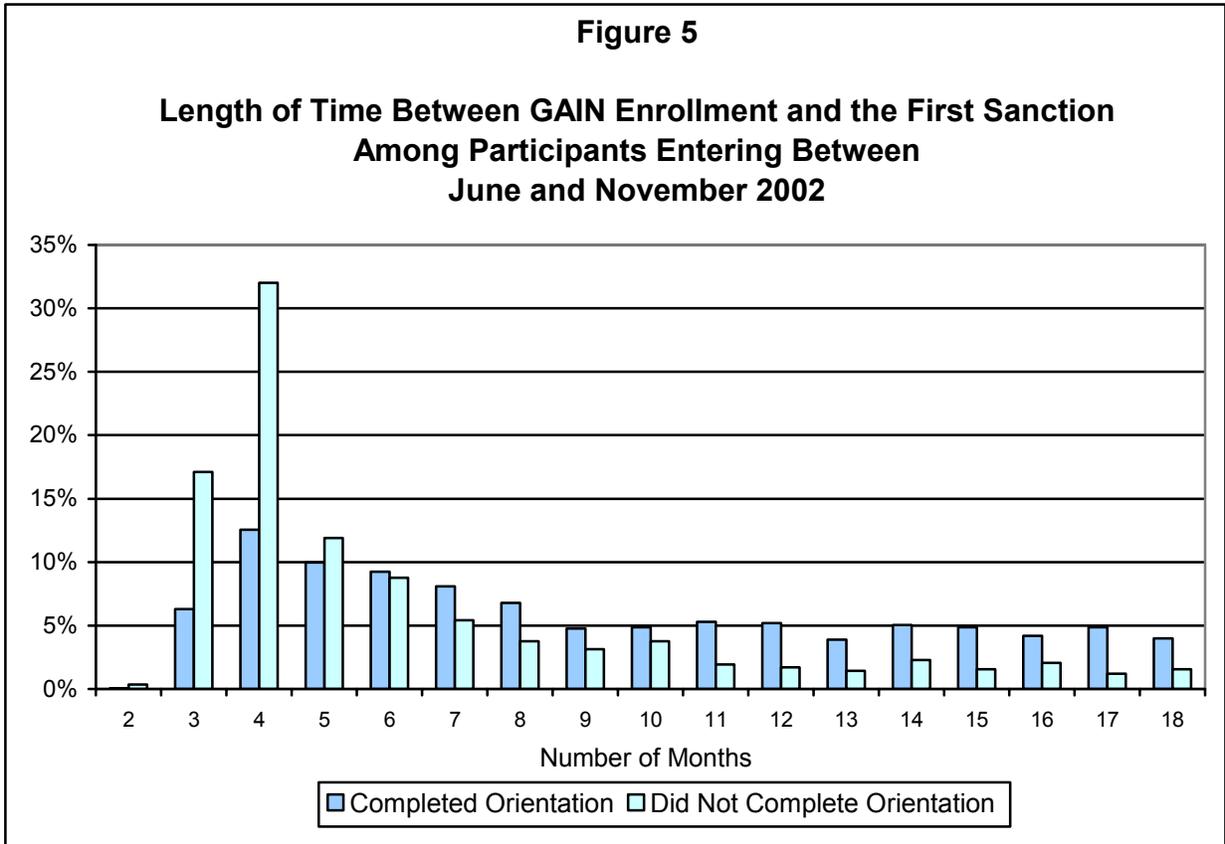
Source: DPSS; GEARS, 2002-2004, Cumulative Sanction File February 2004.

When Are GAIN Participants Sanctioned?

- **Most sanctioned participants are sanctioned before participating in any Welfare-to-Work activity.**

Almost two-thirds of GAIN participants are sanctioned when they fail to show up for their Orientation session. As a result, the vast majority are sanctioned without participating in any Welfare-to-Work activity.

More than half the sanctioned participants were sanctioned within the first six months in the GAIN program, and nearly 85 percent were sanctioned within one year. Figure 5 shows the distribution of time to first sanction for a cohort of participants who entered GAIN between June and November 2002. This cohort was tracked for eighteen months.



Source: DPSS; GEARS, 2002-2004, Cumulative Sanction File February 2004.

Participants who do not complete Orientation are sanctioned sooner than participants who complete Orientation. The high sanction incidence rate observed in the first few months of the study period was associated with participants not completing program Orientation. Overall, 70 percent of participants completed Orientation. Of these, only 21 percent were sanctioned. Among the 30 percent that did not complete Orientation, 36 percent were sanctioned.

Sanction policies are intended to motivate participants to comply with program activities. Among participants who complete Orientation, the failure to complete Job Club or find employment places them at risk of being sanctioned.

Recommendations

- ✓ **Take additional measures to ensure that participants complete Orientation as a means of reducing the number of sanctions in the initial stages of the Welfare-to-Work process.**
- ✓ **Provide GAIN participants with information about work, program requirements, and services, including non-specialized supportive services, when they first become eligible for aid during or before Orientation.**

Who Is at Risk of Being Sanctioned?

- **Older participants, women, married participants, non-English speaking participants and those with younger children are at a lower risk of being sanctioned.**

Participants younger than 45 years of age, as well as non-white, English-speaking and single participants, are more likely to be sanctioned (see Table 4.2).

- **Among participants who complete Orientation, utilization of non-specialized supportive services, such as child care services and transportation, reduces the risk of being sanctioned by 40 percent.**

According to the analysis of administrative data some barriers to compliance are associated with a need for non-specialized supportive services. The data suggest that when this need is met, participants are better equipped to remain compliant with their Welfare-to-Work requirements. This is underscored by the fact that among the 70 percent that completed Orientation, 14 percent completed Job Club and 86 percent utilized transportation services.

- **Increasing job related program participation should be a key part of the effort to lower sanction rates.**

Although participation in any job related program activity reduced the risk of being sanctioned, receiving vocational training after Job Club and Assessment reduced the risk of sanctions the most, by about 68 percent (see Table 4.2). However, participation in Welfare-to-Work activities was low. For example, among those participants who completed Orientation, only 16 percent were enrolled in a Self-Initiated Program (SIP), 19 percent completed Job Club and among these, only 23 percent received vocational training.

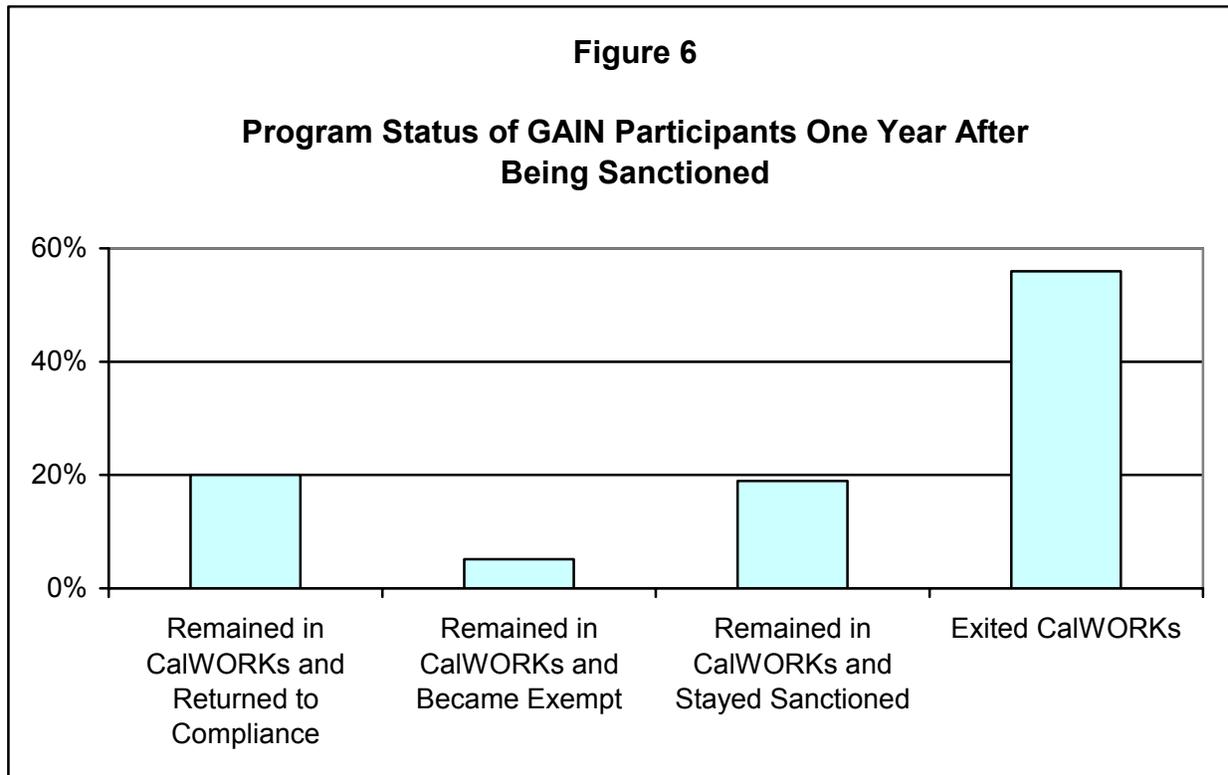
Recommendation

- ✓ **Identify barriers to compliance among participants who are able to complete Orientation but are not able to participate in program activities. Even though involvement in these activities reduces the likelihood of being sanctioned, very few of these participants take part in such program activities.**

What Is the Status of Sanctioned Participants By the End of One Year?

- **One out of five sanctioned participants stayed in the GAIN program one year after receiving their first sanction.**

Analysis of a group of participants who were sanctioned between September 2002 and February 2003 showed that more than half (56 percent) of the sanctioned participants had left CalWORKs by the end of one year after being sanctioned. While 20 percent of these participants returned to compliance, 5 percent were exempted from the program, and 19 percent remained sanctioned after one year following their first sanction (Figure 6).



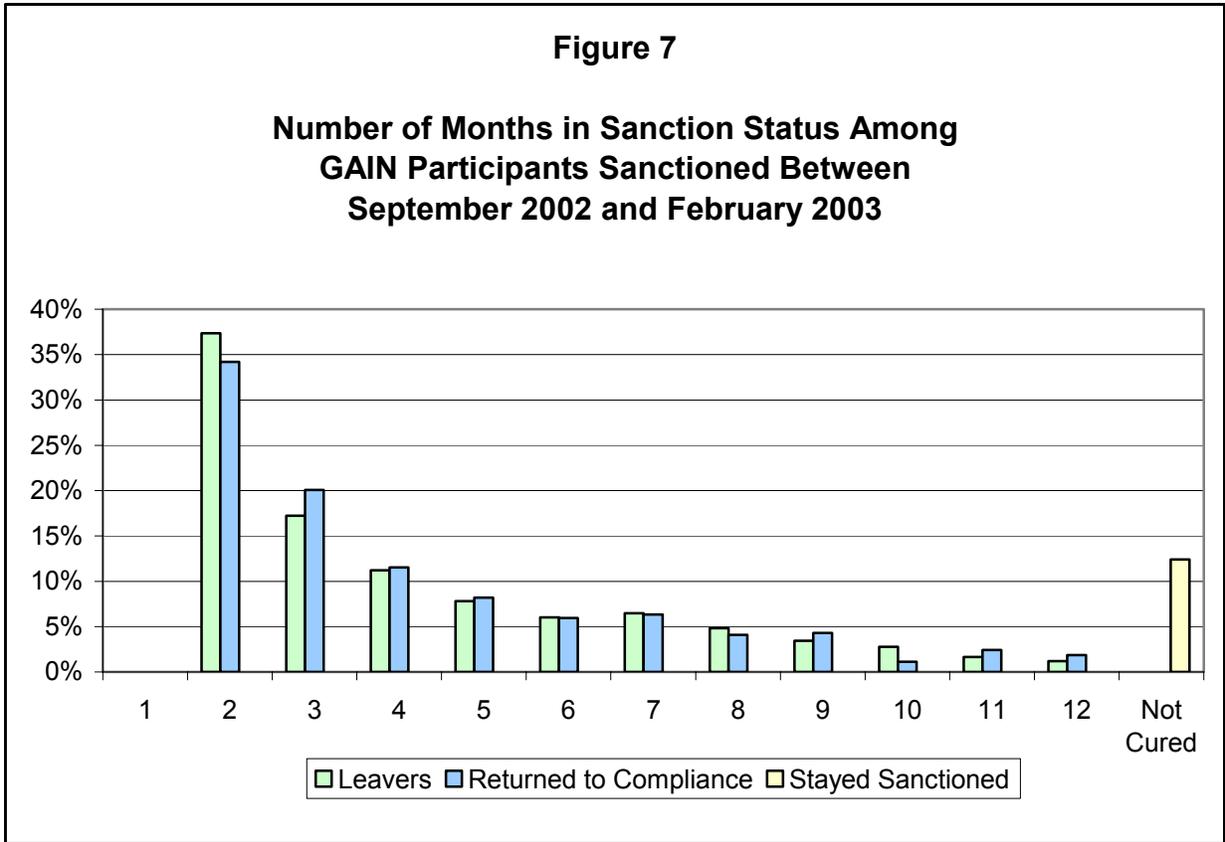
Source: DPSS; GEARS, 2002-2004, Cumulative Sanction File February 2004.

Note: Participants were sanctioned between September 2002 and February 2003.

How Soon Do Sanctioned Participants Return to Compliance?

- **The majority of the sanctioned participants returned to compliance within three months.**

Figure 7 shows the distribution of time to cure a sanction for the 2,133 participants who were sanctioned between September 2002 and February 2003. These participants were tracked for 12 months. Among the sanctioned participants that were cured or returned to compliance, over one third (34 percent) did so within the following month, and over three quarters (76 percent) returned to compliance after three months. Figure 7 also shows the length of sanction among participants who left the CalWORKs program.



Source: DPSS; GEARS, 2002-2004, Cumulative Sanction File February 2004.

Note: Among GAIN participants that were not cured, the length of sanction was 12 months.

What Are the Barriers GAIN Participants Face in Returning to Compliance?

- **Participants with a need for non-specialized supportive services, as well as those with a history of unemployment in the year before entering the GAIN program, had increased difficulty in returning to compliance.**

Sanctioned participants with children under one year of age were at a 21 percent higher risk of not returning to compliance, and those who were unemployed in the year before entering the GAIN program were at a 16 percent higher risk of not returning to compliance (Table 4.3). The probability of returning to compliance was 44 percent for English speaking participants and 88 percent for completing Job Club.

Recommendation

- ✓ **Assess the need for non-specialized supportive services among single parents with younger children at Orientation.**

Implementation of Sanction Policy by GAIN Service Workers

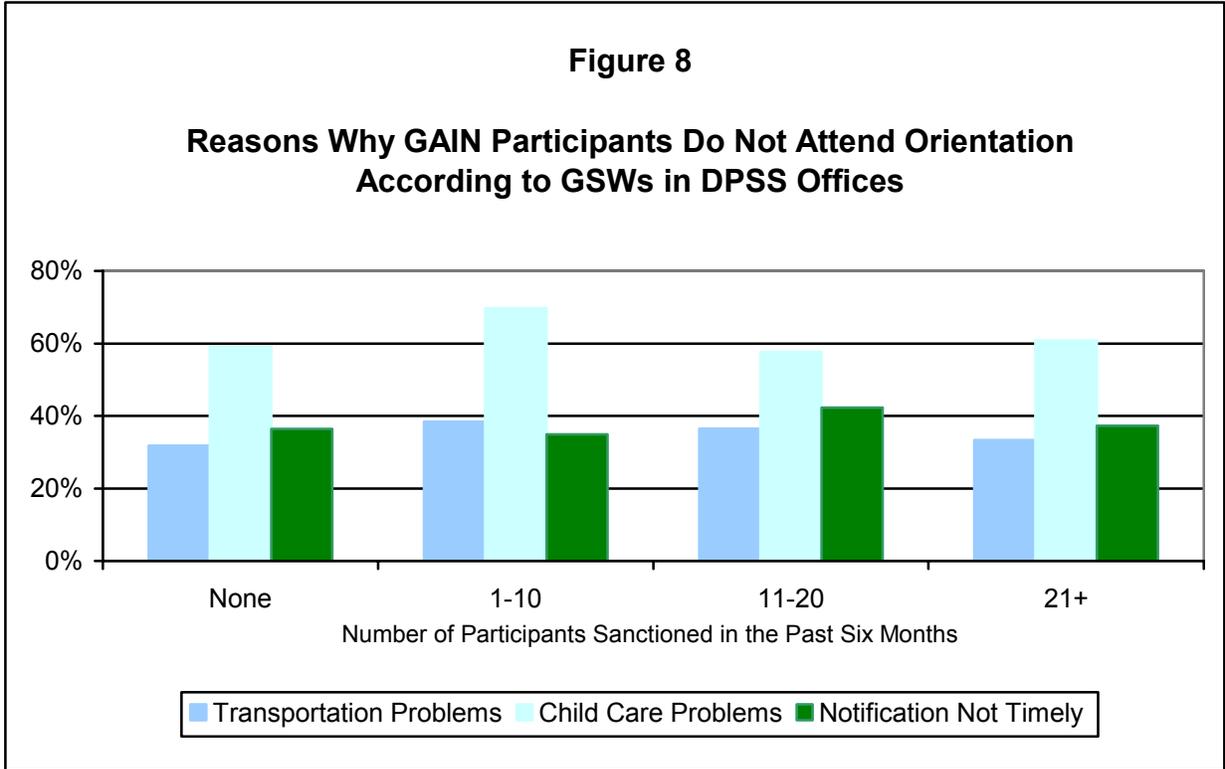
- **The most frequently cited reasons why participants fail to show up for GAIN Orientation are the lack of adequate transportation, child care and failure to receive appointment letters on time.**

Nearly 70 percent of GAIN Service Workers (GSWs) in DPSS offices who sanctioned between 1 and 10 participants indicated that participants could not attend Orientation because of child care needs. In contract offices more than 70 percent of GSWs who sanctioned more than 11 participants said that participants missed Orientation because of child care needs (Figure 8).

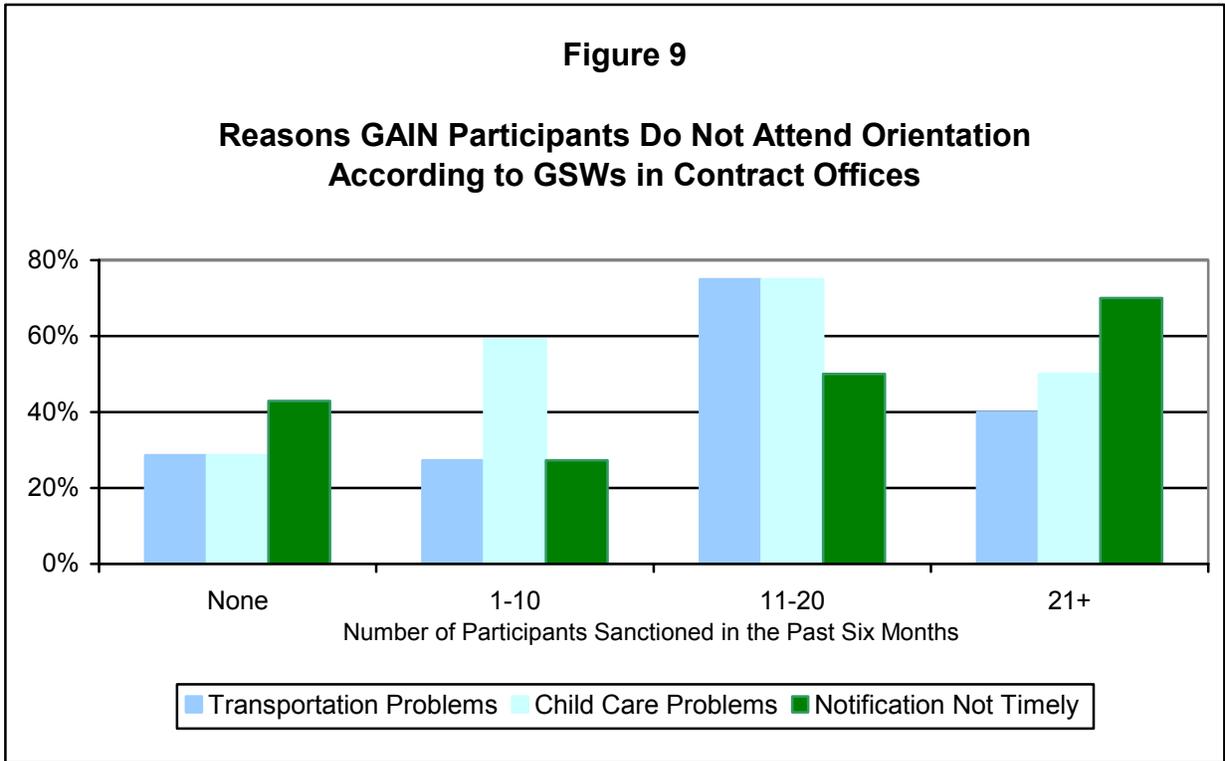
Approximately one-third of the GSWS in DPSS offices (between 31 to 38 percent) indicated transportation problems were a factor impacting attendance in Orientation. However, in contract offices, nearly 75 percent of the GSWs who sanctioned between 11 and 20 participants in the past six months indicated that transportation was a factor in attending Orientation.

Some contract offices are located in areas that are not very well connected with public transportation systems, such as Antelope Valley or Chatsworth. Participants in these areas may be experiencing this problem more than participants in other areas, which is why more sanctions were associated with transportation problems in the contract offices.

Participant failure to receive an appointment letters was also cited by a substantial proportion of GSWs. Nearly a third of GSWS in DPSS offices regardless of number of participants sanctioned indicated this problem. However, in contract offices, not receiving appointment letters on time was associated with higher sanction rates. Nearly 70 percent of GSWs in contract offices who sanctioned more than 21 participants in the past six months noted this problem compared with GSWs who sanctioned only 1 and 10 participants (27 percent).



Source: Employee Staff Survey, July 2004.



Source: Employee Staff Survey, July 2004.

The late receipt of notifications was part of a larger issue that was also articulated in the focus group interviews conducted with GSWs and GAIN participants: Problems within the sanctions process often stem from breakdowns in communication between GAIN offices and GAIN participants. In addition to the late receipt of appointment letters, for example, a number of sanctioned participants did not know why their aid was reduced, nor did they know the proper way to regain the reduction, nor did they know who could help them achieve compliance.

- **Communications difficulties between CalWORKs and GAIN computer systems were cited by GAIN Service Workers in focus group interviews.**

While GAIN Employment and Activity Reporting System (GEARS) is the computer system for GAIN offices, Los Angeles Eligibility, Automated Determination, Evaluation and Reporting (LEADER) is the computer system for CalWORKs offices. Lack of coordination between the two systems is one of the reasons why participants sometimes are late in receiving appointment letters or do not receive them at all, and it is one of the reasons participants are sanctioned in error.

Recommendations

- ✓ **Address non-specialized supportive services needs of participants to facilitate their completion of program Orientation.**
- ✓ **Measures taken to foster better coordination between the CalWORKs and GAIN divisions within DPSS would likely smooth some of the communications problems between GAIN offices and GAIN participants and, in turn, lead to a reduction in sanctions.**

The Next Report

- ✓ Due to the broad array of issues surrounding sanctions and the sanctioned population, DPSS and SIB have agreed to separate the sanctions study into two parts. In addition to the data sources examined for this report (Part I), Part II will present findings from a survey conducted with sanctioned GAIN participants. The focus of Part II will be the effect sanctions have on the lives of GAIN participants, especially in the areas of employment and earnings. The report will also further explore factors associated with participants' noncompliance and return to compliance, as well as the economic consequences of sanctions on participants' families and their children.

CHAPTER I

Introduction

In January 2004, as part of the CalWORKs evaluation authorized by the County of Los Angeles Board of Supervisors, the Department of Public Social Services (DPSS) committed to provide the Board with a study on sanctions and sanctioned CalWORKs participants. This commitment was an outgrowth of recommendations the Los Angeles County Commission for Public Social Services made to the Board regarding the need for information on issues related to sanctions. DPSS contracted with the Chief Administrative Office's (CAO) Service Integration Branch (SIB) to conduct the study of sanctions. Due to the broad array of issues surrounding sanctions and the sanctioned population, DPSS and SIB have agreed to separate the study into two parts.¹ Part I, which is presented in the current report, addresses the following research questions:

- What are the demographic and background characteristics of the sanctioned population? How do these differ from the non-sanctioned population?
- What are the patterns of incidence and duration of sanctions?
- What are common factors identified with the CalWORKs population being sanctioned?
- How does employment history affect the likelihood of being sanctioned?
- Is GAIN caseworker training and experience related to the imposition of sanctions?
- Is GAIN caseworker caseload related to the imposition of sanctions?
- Is GAIN caseworker training and experience related to the curing of sanctions?
- Is GAIN caseworker caseload related to the curing of sanctions?

It is important to point out that the analyses offered in this report focus on GAIN sanctions, which are different from the case terminations that result from failure to follow CalWORKs requirements. CalWORKs case terminations are sometimes referred to as "CalWORKs sanctions," and are different from GAIN sanctions.

Policy Background: Welfare Reform and Sanctions

The passage of the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) in 1996 reformed welfare in the United States from an ongoing cash assistance program to one focused on moving participants towards self-sufficiency. PRWORA replaced the Aid to Families with Dependent Children (AFDC) program with

the Temporary Aid for Needy Families (TANF) program, thereby linking aid to work and placing a five-year cumulative time limit on cash assistance for poor adults. The work component of PRWORA is enforced through the imposition of financial sanctions on participants who fail to comply with program requirements. Because the implementation and administration of PRWORA has been devolved from the Federal government to the states, the use, severity, and frequency of sanctions varies across states.

In California, PRWORA led to the passage of Assembly Bill 1542 (AB1542), the Welfare-to-Work Act, in 1997. AB1542 is the welfare reform law for California and represents one of the nation's more lenient set of legal regulations with respect to the imposition of financial sanctions on noncompliant Welfare-to-Work participants. AB1542 created the California Work Opportunity and Responsibility to Kids (CalWORKs) program. The Welfare-to-Work component under CalWORKs is the Greater Avenues for Independence (GAIN) program.² Under CalWORKs, families continue to receive the children's portion of their cash grant after sanctions have been imposed on adults who fail to comply with GAIN program requirements.

Interest in sanctions and the sanctioned population has been increasing in the last several years. The use and frequency of sanctions, as well as the factors that cause Welfare-to-Work participants to be sanctioned and the impact of sanctions on these participants, are issues policymakers and policy analysts have recently sought to examine more closely. In accordance with DPSS' "Departmental Action Plan to Enhance Delivery of Specialized Supportive Services", this study seeks to determine the extent to which sanctions, instituted for the purpose of compelling welfare parents to participate in mandated activities, achieve their intended goal.

Sources and Methods

This report analyzes the sanctioned population in the County of Los Angeles between April 2002 and February 2004. The challenges involved in reliably capturing information about this population and the sanctions process require the use of several distinct but complementary sources of data and modes of analysis. Descriptive and multivariate statistical methods are used in this report for the purposes of analyzing administrative records from DPSS and a survey of GAIN workers conducted by SIB. These methods illuminate general tendencies and large-scale processes associated with sanctions. One important limitation of these quantitative methods, however, is they provide little insight into the daily practices and perceptions of participants and the GAIN workers who manage their cases. In order to gather this type of micro-level, qualitative data, this report utilizes focus group interviews conducted with both GAIN participants and GAIN Service Workers (GSWs). The information collected in focus group interviews does not necessarily represent general tendencies connected to the sanctions process, but these interviews nevertheless provide insight into the individual level practices of specifically targeted types of participants and GSWs.

Throughout this report, the two levels of data and analysis—general and quantitative, on the one hand, micro/individual and qualitative, on the other hand—are used in a

mutually complementary way. The focus group interviews are not used to draw definitive conclusions and cannot, by themselves, serve as the basis for policy recommendations. Rather, these interviews add subjective insights and a 'human element' to some of the more general processes shown through the statistical analysis of quantitative data.

The State of Knowledge on Sanctions

Interest in sanctions has increased over the last several years among policy researchers concerned with the program features of welfare reform. However, the state of knowledge on sanctions remains somewhat limited. One of the general issues that has posed a challenge to analysts is the diversity of sanctions policies from one state to the next. For example, while some states penalize noncompliance through the imposition of full-family sanctions, others impose partial sanctions that preserve all or most of the child portion of welfare cash grants. In addition, a handful of states impose initial partial sanctions that become full-family sanctions if they are not cured within a stipulated period of time. These are just some of the variations in policy that have limited the scope of many studies to single states and localities and imposed limits on the kinds of questions that can be addressed about the overall effects of sanctions. Nevertheless, some important knowledge has been obtained from analyses of single states and localities.

Four of the most important areas of inquiry in the sanctions literature are as follows: 1) The methodological issues involved in the analysis of sanctioned populations, especially the complex problem of calculating sanction rates; 2) The barriers to Welfare-to-Work program compliance; 3) The background characteristics of sanctioned populations; and 4) Outcomes associated with sanctions.

This chapter discusses important findings in each of these areas and, where possible, these findings are linked to the research questions addressed in this report. What follows is not a completely exhaustive review of research literature on sanctions, but the discussion does provide a general sense of what studies of sanctions and sanctioned populations have shown thus far. A summary list of some key research findings on sanctions are as follows:

- Reported sanction rates are heavily influenced by the methodologies used to derive them and the policies implemented in the states in question. Moreover, different methodologies are appropriate in analyzing states with different sets of sanctions policies (Pavetti, Derr and Hesketh, 2003).
- Sanctioned welfare populations tend to struggle with personal barriers to a higher degree than non-sanctioned populations. Examples of these barriers are lack of education, mental and physical disabilities, lack of work experience, and relatively long welfare histories (Bloom and Winstead, 2002; Cherlin et al., 2001; Fein and Lee, 1999; Kaplan, 1999; MaCurdy, Mancuso and Strain, 2002; and Pavetti et al., 2004).

- A three-city study looking at Boston, Chicago and San Antonio has reported ill health as a major barrier to compliance with Welfare-to-Work program requirements. Participants who lost benefits were more likely to report having health problems (Cherlin et al., 2001).
- Sanctioned Welfare-to-Work participants tend to live in larger households and be younger than non-sanctioned participants. In addition, African-Americans tend to be sanctioned more than other ethnic groups (Born, Caudill and Cordero, 1999; Edelhoeh, Liu and Martin, 1999; Fein and Lee, 1999; Hasenfeld, Ghouse and Hillesland-Larson, 2002; Kalil and Seefeldt, 2002; Mancuso and Lindler, 2001; Koralek, 2000; Pavetti et al., 2004; and Westra and Routely, 2000).
- Results from an especially rigorous multi-state study suggest that partial sanctions are sufficient to encourage a substantial number of families to comply with Welfare-to-Work requirements. However, this finding is derived from an analysis of states that impose gradual full-family sanctions, i.e., partial-family sanctions that become full-family sanctions, if they are not cured after a limited amount of time (Pavetti et al., 2004).
- The same study suggests that the majority of participants who receive a full-family sanction do not experience favorable employment outcomes (Pavetti et al., 2004).
- An analysis comparing hardships across groups of welfare participants—i.e., sanctioned participants who leave welfare (“leavers”), non-sanctioned leavers, and participants who stay on welfare (“stayers”)—found that sanctioned leavers are significantly more likely after one year to experience material hardships than those who remain on TANF (Reichman, Teitler and Curtis, 2003).

Methodological Issues

One of the most fundamental methodological problems involved in studying sanctions is the question of how to count the sanctioned population. This is an issue in which the utilization of data must be considered in combination with the substantive policy features implemented in different states. The appropriate use of data for sanctions research depends on the policy features in place. The policy features, in turn, affect the methodologies researchers can use in counting sanctioned participants and calculating sanction rates. As Pavetti, Derr and Hesketh point out in their overview of sanctions literature, “Because of differences in methodology, studies reported a wide range of estimates of the incidence of sanctions.”³ It is, therefore, necessary to define the major strategies used in calculating sanction rates.

One approach to counting sanctioned participants and calculating a sanction rate is to focus exclusively on closed TANF cases and compute the percentage of these cases that are terminated due to sanctions.⁴ This method provides reliable rates only for

regions that impose full-family sanctions. In certain states, such as California, families continue to receive the children's portion of the welfare cash grant after adults have been sanctioned. For this reason, a sanction rate based on closed cases will generate a significant undercount of the proportion of welfare families that have been sanctioned.

A second approach researchers used in providing counts of sanctioned participants and calculating sanction rates is one in which focus is placed on the proportion of current TANF recipients who are sanctioned.⁵ This method, unlike the method that bases its rates on closed cases, is useful in the analysis of states where partial family sanctions are imposed, such as California. One significant problem with this approach, however, is that it cannot deal effectively with the time lag between when a sanction is imposed and when the sanction appears in official administrative records. Using the current caseload as the basis for a sanction rate calculation can, therefore, also produce an undercount. However, the undercount that results from the use of this method is offset, at least somewhat, by the subsequent and similar time lag that occurs in recording sanction cures.

A third approach follows a randomly selected cohort of welfare recipients over a fixed period of time and calculates a rate based on the proportion of recipients within the cohort that receive sanctions.⁶ The cohorts consist of participants who enter a Welfare-to-Work program at the same time. The cohort method can be used in regions where either full-family or partial-family sanctions are imposed. Moreover, because the time period chosen for analysis is fixed in the past, this method is not hampered by the time lag between the imposition of sanctions and the appearance of sanctions in administrative records. Pavetti, Derr and Hesketh (2003) note cohort analysis provides "the most complete accounting of the number of families who have experienced sanctions."

Although there are limitations involved in utilizing the method that uses current sanctioned participants as the basis for a count of the sanctioned population, this study utilizes this method where it is necessary to do so. At the same time, key portions of the descriptive analysis in this study utilize the cohort method.

Reported Sanction Rates

Considerably higher sanction rates tend to be reported when the cohort method is used as the basis of calculations. For example, Fein and Lee (1999) use cohort analysis in their study of full-family sanctions in Delaware. Their study reports a sanction rate of 60 percent for an 18-month period between 1996 to 1998.⁷ Holcomb and Ratcliffe's (2000) study of partial sanctions in Indiana, which also employs cohort analysis, reports a sanction rate of 45 percent for a period from 1996 to 1997.⁸ But Born, Caudill and Cordero's (1999) study of full-family sanctions in Maryland, which is based on closed cases, reports a sanction rate of just over 7 percent for an 18-month period between 1996 to 1998.⁹ In addition, the United States General Accounting Office (GAO) (2000) conducted a nationwide study which included different types of sanctions (i.e., partial

and full family). This study looked at the entire TANF caseload for 1998 and reported an average monthly sanction rate of 5 percent.¹⁰

Pavetti et al. (2004) have looked at sanction rates in Illinois, New Jersey, and South Carolina.¹¹ Because their study employs the cohort method in its analysis of all three states, it enables readers to hold methodological issues constant in looking at the association between sanctions policy and sanctions rates. In examining South Carolina, a state that imposes immediate full-family sanctions, but which also “has chosen to use sanctions only as a last resort,” the study reports a sanction rate of 5 percent over ten months, “the maximum period for which [they] have data.” Illinois and New Jersey, as they point out, “are nearly identical” in their sanctions policies. Both states impose initial partial sanctions that can become full-family sanctions if they are not cured after a stipulated period of time. However, Illinois has implemented an applicant job search requirement that is “intended to engage families in work activities rapidly and provide TANF benefits only to those willing to look for work actively or who can demonstrate they are experiencing personal or family challenges that limit their ability to work.” This applicant requirement prevents a significant portion of participants who would be likely to be sanctioned from entering the state’s welfare system, and this contributes to lower sanction rates in Illinois.¹² The study reports the full-family sanction rate was 10 and 12 percent in Illinois and New Jersey respectively over the same 10-month period. At the same time, 30 percent of families in New Jersey, versus 24 percent of families in Illinois, experienced some type of sanction, including a full-family sanction. Pavetti et al. also looked at the total 18-month period for which they have data, and the proportion of families with any grant reduction due to a sanction was 39 percent for New Jersey and 31 percent for Illinois.¹³

This summary of studies looking at sanctions rates re-emphasizes the influence that both state policy differences and methodology have on reported rates. It is, therefore, crucial that these factors be specified in all discussion of the incidence of sanctions. Furthermore, methodological differences and policy variations imply rates reported for different states are often not immediately comparable.

Barriers to Program Compliance

One of the crucial substantive issues researchers have addressed in looking at sanctions is whether Welfare-to-Work participants with personal deficits are more likely to be sanctioned. Pavetti et al. frame the question in the following way: *How do personal liabilities influence the likelihood of a sanction?* In addressing this issue, research literature has consistently shown sanctioned participants tend to struggle with personal barriers to a higher degree than non-sanctioned participants.

One such barrier is a lack of education. This deficit poses two closely related problems for Welfare-to-Work participants. First, an educational deficit makes it less likely that participants will be able to adequately grasp the rules with which they are asked to comply. Secondly, this deficit makes participants less likely to be able to find and retain work. Sanction studies indicate that both of these immediate problems ultimately

contribute to the likelihood that a participant will be sanctioned.¹⁴ Moreover, Fein and Lee, have done a study showing sanctioned participants tend to have less work experience and longer welfare histories.¹⁵

Research further indicates sanctioned participants also tend to have more mental and physical disabilities than non-sanctioned participants. Cherlin et al. (2001), for example, look at Boston, Chicago, and San Antonio, and they compare sanctioned and non-sanctioned participants. The study finds sanctioned participants are more likely than non-sanctioned participants to report being in “fair” or “poor” health as opposed to “good,” “very good,” or “excellent” health.¹⁶

Research also suggests that the probability of being sanctioned increases when participants have multiple personal liabilities. In reporting results for the Illinois portion of their multi-state study, for example, Pavetti et al. (2004) write that, “the likelihood of ever being sanctioned increases substantially when a recipient has four or more liabilities. With one liability present, the likelihood of being sanctioned is 24 percent. When two or three barriers are present, the probability of being sanctioned is only slightly higher at 25 percent. However, when four or more barriers are present, the probability increases dramatically to 42 percent.”¹⁷

In looking at the factors associated with being sanctioned, the present report attempts to replicate some of the most important published research findings on barriers. Chapter 4 of this report examines the question of whether personal liabilities have a notable impact on the probability participants will be sanctioned within the County of Los Angeles’ CalWORKs population.

Background Characteristics of Sanctioned Populations

Considered as a whole, findings from research literature suggest the background characteristics of sanctioned welfare participants are somewhat varied from one state to the next. Nevertheless, some general conclusions can be drawn about the background composition of sanctioned populations. Several studies covering states that are divergent at a number of levels have shown sanctioned participants tend to be younger than non-sanctioned participants. Koralek (2000), for example, has done a study of sanctions in South Carolina and found sanctioned participants there, on average, tend to be two years younger than non-sanctioned participants. Born, Caudill, and Cordero (1999) found a very similar age trend in Maryland. In addition, Hasenfeld, Ghouse and Hillesland-Larson (2002) have found that welfare participants in California under the age of 24 are at greater risk of being sanctioned relative to older participants.¹⁸

A second common background element that emerges out of several studies is household size and, by extension, the number of children in the household. Research on California, South Carolina and Maryland indicates sanctioned participants tend to live in larger households than non-sanctioned participants.¹⁹

Findings from the research literature also indicate some similarities in the ethnic composition of sanctioned populations from one state to the next. Pavetti et al. find that, “African-Americans are more likely to be sanctioned than other racial and ethnic groups, while Hispanics and other nonwhites (typically Asians) are least likely to be sanctioned in [Illinois and New Jersey].”²⁰ Researchers looking at sanctioned populations in Michigan, Delaware, South Carolina, and Arizona similarly found that African-Americans get sanctioned in higher proportions than other ethnic groups.²¹

Although broad conclusions must be made carefully, research to date on barriers and background characteristics enables us to derive an approximate picture of sanctioned welfare populations. These populations tend to be relatively young and live in large households. African-Americans are sanctioned with greater frequency than other ethnic groups. In addition, sanctioned participants tend to be less educated and have less work experience than non-sanctioned participants, and tend to have more physical and mental disabilities. The analyses done in Chapters 3 and 4 of this report allows a comparison to be made of sanctioned CalWORKs participants in the County of Los Angeles and sanctioned participants elsewhere.

Outcomes Associated With Sanctions

The effects sanctions have on noncompliant Welfare-to-Work participants is a question that touches directly on the issue of whether sanctions produce their desired outcomes. For example, do sanctions encourage compliance with Welfare-to-Work requirements? To what extent do sanctioned participants leave welfare altogether, and what are the specific factors that influence this decision? Do sanctions affect the ability participants have to find employment? How do sanctions affect the economic circumstances that Welfare-to-Work participants face? What impact do sanctions have on the children in aided households?

Research on the effects of sanctions is still somewhat limited. At the same time, it bears repeating that, because sanctions policies are not uniform from one state to the next, it is difficult to look at the available research reports and arrive at broad conclusions about the impact of sanctions. Several studies have, in fact, addressed issues that speak to the comparative implications of this lack of sanctions policy uniformity, concluding that more severe policies are associated with greater caseload declines.²²

Wu et al. (2004) conducted an analysis of Welfare-to-Work participants in Wisconsin and generated findings suggesting that sanctions promote program compliance. Their study, which analyzes the period from 1997 to 2003, finds that, “the most common transition from a sanction is back to full benefit receipt. Even among those with full sanctions, only 16 percent continued to have a full sanction in the second month. The fact that sanction spells are short and the most common pattern is return to full benefits could be interpreted as suggesting that sanctions are having their desired effect of changing behavior towards compliance with program requirements.”²³ Pavetti et al. generated similar findings in their analyses of Illinois and New Jersey. They note that

outcomes in Illinois and New Jersey suggest the imposition of a gradual full-family sanction promote compliance with work requirements. They examined the same 18-month period in both states and found the majority of participants who had initial partial sanction imposed on them eventually come into compliance with work requirements (67 percent in Illinois and 60 percent in New Jersey). The majority of participants who came into compliance in both states (60 percent in New Jersey and 80 percent in Illinois) did so before a full-family sanction is ever imposed.²⁴

Pavetti et al. also look at the employment and welfare dynamics associated with sanctions, but their analysis in this direction is limited to the state of New Jersey and participants who received full-family sanctions. For this reason, the comparability of their findings is somewhat limited given the purposes and focus of this report. Nevertheless, these findings are instructive. A solid majority of the participants they analyzed (88 percent) returned to welfare or found work within the first year after the full-family sanction was imposed. However, the analysis reveals most of these participants returned to TANF, while considerably less found employment. During the year after receiving a full-family sanction, the analyzed participants, on average, were on TANF for four months without being employed and were on TANF for one month while they were employed. Moreover, these participants were off TANF and employed for three months and off TANF and not employed for four months. In addition to this, 75 percent of the Welfare-to-Work participants they looked at were not employed while they were sanctioned.²⁵ This limited data, therefore, suggests the majority of participants who received full-family sanctions between July 2000 and June 2001 did not experience favorable employment outcomes.

In addition to employment, another important issue in the area of outcomes is the question of the impact sanctions have on the economic circumstances of sanctioned participants. Reichman, Teitler and Curtis (2003) have done a national study using multivariate analysis to examine hardships across different groups of Welfare-to-Work participants: Sanctioned leavers, non-sanctioned leavers and stayers. The study found that sanctioned leavers are 3.5 times as likely as those who remain on TANF to experience material hardships after one year, such as homelessness/eviction, hunger, and financial hardship.²⁶

Part II of the present sanctions study will expand on a number of issues researchers have examined in looking at outcomes associated with sanctions. For example, Part II will look at how the employment opportunities of sanctioned CalWORKs participants in the County of Los Angeles are affected not simply by sanctions, but also by the number of times these participants are sanctioned and the length of their sanctions. Part II will also look at the factors that influence sanctioned participants in making the decision to either return to compliance or leave the CalWORKs program. In addition, the basic issue of the extent to which partial family sanctions in the County of Los Angeles encourage program compliance will be examined.

The Chapters of This Report

Chapter 2 of this report describes DPSS' GAIN sanctions policies and procedures and provides background information that will facilitate an understanding of the analysis given in later chapters of the causes and consequences of sanctions.

Chapter 3 provides a picture of the demographic and background characteristics of sanctioned GAIN participants. The chapter also examines sanction rates both in the County of Los Angeles as a whole and in specific GAIN Regions within the County. In addition, the chapter looks at the duration of sanctions and participation in Welfare-to-Work activities.

Chapter 4 examines factors associated with both sanctions and the return to compliance through multivariate statistical analysis of administrative data.

Chapter 5 presents the results of focus group interviews that were conducted with sanctioned GAIN participants. The chapter captures the participants' perceptions of the sanctions process in their own words, thereby adding a qualitative and micro-level dimension to the analysis offered in Chapter 4.

Chapter 6 presents the results of a survey SIB conducted with GAIN staff and looks specifically at the effects caseload size, staff education, and staff experience have on the frequency with which staff sanction and cure participants. The chapter also examines answers staff gave to a number of questions about sanctioned participants and sanctions policy.

Chapter 7 also looks at GAIN staff, complementing the survey analysis in chapter 6 by drawing on focus group interviews in an attempt to provide a qualitative understanding of how GAIN workers administer and experience sanctions policies and procedures.

Chapter 8 provides a summary of this report and policy recommendations based on the report's major findings. This concluding chapter also builds a bridge between the results presented in this report and the questions to be addressed in Part II of the sanctions study.

Endnotes

¹Part II of this sanctions study will examine the return to compliance among sanctioned CalWORKs participants and outcomes associated with sanctions. Part II will address the following research questions:

- What factors lead sanctioned participants to return to compliance versus continue being sanctioned?
- How are the employment opportunities of sanctioned participants affected by the number of times they are sanctioned and length of their sanction?

- What are the program effects or factors associated with participants' noncompliance and return to compliance?
- Do the reasons for sanction differ by the length of sanctions and the number of times participants get sanctioned?
- What are the economic consequences of sanctions on participants' families?
- What are participants' perceptions of problems associated with their noncompliance?
- What is the role of the need for supportive services among participants and its association with noncompliance leading to sanctions?

² It is important to note here that the GAIN program was revamped to comply with AB 1542.

³ Pavetti, LaDonna, Michelle K. Derr and Heather Hesketh. *Review of Sanction Policies and Research Studies: Final Literature Review*. Washington, D.C.: Mathematica Policy Research, Inc., March 10, 2003. P.8

⁴ For examples of research that base sanction rate calculations on closed TANF cases, see the following: Westra, Karen and John Routely. *Arizona Cash Assistance Exit Study, First Quarter 1998 Cohort*. Arizona: Department of Economic Security, 2000; Born, Catherine, Pamela Caudill and Melinda Cordero. *Life After Welfare: A Look at Sanctioned Families*. Baltimore, MD: School of Social Work, University of Maryland, 1999; Edelhoj, Marilyn, Qiduan Liu, and Linda Martin. *The Post-Welfare Progress of Sanctioned Clients: A Study Using Administrative and Survey Data to Answer Three of Four Important Questions*. South Carolina: Department of Social Services, Office of Planning and Research, 1999.

⁵ For examples of research that base sanction rate calculations on current TANF caseloads, see the following: Koralek, Robin. *South Carolina Family Independence Program Process Evaluation*. Prepared for the South Carolina Department of Social Services. Washington, D.C.: The Urban Institute, 2000; General Accounting Office. *State Sanction Policies and Number of Families Affected*. Washington, D.C.: GAO, 2000.

⁶ For examples of research that calculate sanction rates using a cohort method, see the following: Fein, David J. and Wang S. Lee. *The ABC Evaluation: Carrying and Using the Stick: Financial Sanctions in Delaware's 'A Better Chance' Program*. Prepared for Delaware Health and Social Services. Cambridge, MA: Abt Associates, Inc., 1999; Holcomb, Pamela and Caroline Ratcliffe. "When Welfare Recipients Fail to Comply with Work Requirements: Indiana's Experience with Partial Benefit Sanctions," in *Journal of Applied Social Sciences*, volume 24, no.1, 2000.

⁷ Fein, David J. and Wang S. Lee. *The ABC Evaluation: Carrying and Using the Stick: Financial Sanctions in Delaware's 'A Better Chance' Program*. Prepared for Delaware Health and Social Services. Cambridge, MA: Abt Associates, Inc., 1999. P.3.

⁸ Holcomb, Pamela and Caroline Ratcliffe. "When Welfare Recipients Fail to Comply with Work Requirements: Indiana's Experience with Partial Benefit Sanctions," in *Journal of Applied Social Sciences*, volume 24, no.1, 2000.

⁹ Born, Catherine, Pamela Caudill and Melinda Cordero. *Life After Welfare: A Look at Sanctioned Families*. Baltimore, MD: School of Social Work, University of Maryland, 1999.

¹⁰ General Accounting Office. *State Sanction Policies and Number of Families Affected*. Washington, D.C.: GAO, March 2000. P.28.

¹¹ The results from the Pavetti et al. study that are discussed here were generated using administrative records and surveys. For the analysis of New Jersey, the authors primarily looked at administrative records for single-parent families receiving TANF benefits at any time during the period from July 2000 to June 2001. Survey data for New Jersey was collected from a sample of families between April and August 2002. For the analysis of Illinois, the study primarily examines administrative records for single-

parent families authorized to receive TANF grants in November 2001. Survey data for Illinois was collected from a small sample of parents between November 2001 and March 2002. For the analysis of South Carolina, administrative records were observed for single-parent cases that received TANF benefits in June 2002. Survey data for South Carolina was collected from a sample of families between August and November 2002. (Pavetti et al. *The Use of TANF Work-Oriented Sanctions in Illinois, New Jersey, and South Carolina*. Final Report. Washington, D.C.: Mathematica Policy Research, Inc., April 30, 2004).

¹² Pavetti et al. state the following with respect to the applicant job search requirement in Illinois: "Almost certainly, among the families that do not fulfill the job search requirement are those that would have experienced difficulty in meeting the work requirement if their application for assistance had been approved; such families would have been candidates for sanctioning if the requirement had not been in place." (Pavetti et al. *The Use of TANF Work-Oriented Sanctions in Illinois, New Jersey, and South Carolina*. Final Report. Washington, D.C.: Mathematica Policy Research, Inc., April 30, 2004. P. 31).

¹³ The report also notes that the presence of more long-term recipients in Illinois relative to New Jersey is another factor contributing to lower sanction rates in Illinois (Pavetti et al. *The Use of TANF Work-Oriented Sanctions in Illinois, New Jersey, and South Carolina*. Final Report. Washington, D.C.: Mathematica Policy Research, Inc., April 30, 2004. P.31.).

¹⁴ Fein, David J. and Wang S. Lee. *The ABC Evaluation: Carrying and Using the Stick: Financial Sanctions in Delaware's 'A Better Chance' Program*. Prepared for Delaware Health and Social Services. Cambridge, MA: Abt Associates, Inc., 1999; Bloom, Dan and Don Winstead. *Welfare Reform and Beyond: Sanctions and Welfare Reform*. Policy Brief No.12, January, 2002. Washington, D.C.: The Brookings Institution, 2002; Cherlin, Andrew J., et al. "Operating within the Rules: Welfare Recipients' Experiences with Sanctions and Case Closings," in *Social Science Review*. September, 2002; Kaplan, Jan. *The Use of Sanctions Under TANF: Issue Notes*, Volume 3, No.3. Washington, D.C. Welfare Information Network, 1999.

¹⁵ Fein, David J. and Wang S. Lee. *The ABC Evaluation: Carrying and Using the Stick: Financial Sanctions in Delaware's 'A Better Chance' Program*. Prepared for Delaware Health and Social Services. Cambridge, MA: Abt Associates, Inc., 1999.

¹⁶ Cherlin, Andrew et al. *Sanctions and Case Closings for Noncompliance: Who is Affected and Why*. Policy Brief. Baltimore, MD: Welfare, Children and Families: A Three-City Study. Johns Hopkins University, February, 2001. P.5.

¹⁷ Pavetti et al. look at a wide range of barriers in arriving at their conclusions. These barriers include educational deficits, limited recent work experience, physical and/or mental health problems, criminal records, chemical dependence, difficulty with English, pregnancy, transportation difficulties, and unstable housing. (Pavetti et al. *The Use of TANF Work-Oriented Sanctions in Illinois, New Jersey, and South Carolina*. Final Report. Washington, D.C.: Mathematica Policy Research, Inc., April 30, 2004. Pp. 36-37). For additional analysis of the relationship between multiple barriers and sanctions see: MaCurdy, Thomas E., David C. Mancuso and Margaret O'Brien Strain. *Does California's Welfare Policy Explain the Slower Decline of its Caseload?* San Francisco, CA: Public Policy Institute of California, January, 2002.

¹⁸ Born, Catherine, Pamela Caudill and Melinda Cordero. *Life After Welfare: A Look at Sanctioned Families*. Baltimore, MD: School of Social Work, University of Maryland, 1999; Hasenfeld, Yeheskel 'Zeke', T.J. Ghose, and Kandyce Hillesland-Larson. "At Risk of Being Sanctioned: Comparing Sanctioned and Non-Sanctioned Welfare Recipients in California's CalWORKs." Prepared for the 24th Annual Research Conference of the Association for Public Policy Analysis and Management, Dallas TX. Los Angeles, CA: UCLA, Department of Social Welfare, School of Public Policy and Social Research, 2002.

¹⁹ Born, Catherine, Pamela Caudill and Melinda Cordero. *Life After Welfare: A Look at Sanctioned Families*. Baltimore, MD: School of Social Work, University of Maryland, 1999; Edelhoch, Marilyn,

Qiduan Liu, and Linda Martin. *The Post-Welfare Progress of Sanctioned Clients: A Study Using Administrative and Survey Data to Answer Three of Four Important Questions*. South Carolina: Department of Social Services, Office of Planning and Research, 1999; Mancuso, David and Vanessa L. Lindler. *Examining the Circumstances of Welfare Leavers and Sanctioned Families in Sonoma County*, Final Report. Burlingame, CA: The Sphere Institute, 2001; Hasenfeld, Yeheskel 'Zeke', T.J. Ghose, and Kandyce Hillesland-Larson. "At Risk of Being Sanctioned: Comparing Sanctioned and Non-Sanctioned Welfare Recipients in California's CalWORKs." Prepared for the 24th Annual Research Conference of the Association for Public Policy Analysis and Management, Dallas TX. Los Angeles, CA: UCLA, Department of Social Welfare, School of Public Policy and Social Research, 2002.

²⁰ Pavetti et al. *The Use of TANF Work-Oriented Sanctions in Illinois, New Jersey, and South Carolina*. Final Report. Washington, D.C.: Mathematica Policy Research, Inc., April 30, 2004. P.33.

²¹ Kalil, Ariel, Kristin S. Seefeldt, and Hui-chen Wang. "Sanctions and Material Hardship Under TANF," in *Social Service Review*, vol. 24, no.1, 2002; Fein, David J. and Wang S. Lee. *The ABC Evaluation: Carrying and Using the Stick: Financial Sanctions in Delaware's 'A Better Chance' Program*. Prepared for Delaware Health and Social Services. Cambridge, MA: Abt Associates, Inc, 1999; Edelhoeh, Marilyn, Qiduan Liu, and Linda Martin. *The Post-Welfare Progress of Sanctioned Clients: A Study Using Administrative and Survey Data to Answer Three of Four Important Questions*. South Carolina: Department of Social Services, Office of Planning and Research, 1999; Westra, Karen and John Routely. *Arizona Cash Assistance Exit Study, First Quarter 1998 Cohort*. Arizona: Department of Economic Security, 2000.

²² Hofferth, Sandra, Stephen Stanhope, and Kathleen Mullan Harris. *Exiting Welfare in the 1990s: Did Public Policy Influence Recipients' Behavior?* Ann Arbor, MI: Population Studies Center at the Institute for Social Research, University of Michigan, 2000; Rector, Robert E. and Sarah E. Youssef. *The Determinants of Welfare Caseload Decline*. Washington, D.C.: The Heritage Foundation, 1999; Mead, Lawrence M. "Governmental Quality and Welfare Reform." Paper presented at the 2000 Annual Meeting of the American Political Science Association. Washington, D.C., September 1, 2000.

²³ Wu, Chi-Fang, et al. *How Do Welfare Sanctions Work?* Madison, WI: Institute for Research on Poverty, University of Wisconsin-Madison., March 2004. P.22

²⁴ However, the authors add the following important caveat: "What we cannot tell from these data is whether families would have responded differently if the initial grant reduction was not followed by a full-family sanction." (Pavetti et al. *The Use of TANF Work-Oriented Sanctions in Illinois, New Jersey, and South Carolina*. Final Report. Washington, D.C.: Mathematica Policy Research, Inc., April 30, 2004. P.42).

²⁵ Pavetti et al. *The Use of TANF Work-Oriented Sanctions in Illinois, New Jersey, and South Carolina*. Final Report. Washington, D.C.: Mathematica Policy Research, Inc., April 30, 2004. P. 41.

²⁶ Reichman, Nancy E., Julien O. Teitler and Marah A. Curtis. *Hardships Among Sanctioned Leavers, Non-Sanctioned Leavers, and TANF Stayers*. Working Paper #03-17-FF. Princeton, N.J.: Princeton University; Center for Research on Child Wellbeing, December, 2003. P.13. For further analysis of hardships associated with sanctions, see: Kalil, Ariel, Kristin S. Seefeldt and Hui-chen Wang. "Sanctions and Material Hardship Under TANF", in *Social Service Review*, 76(4): 642-665, December 2002.

CHAPTER II

Sanctions Policy

With the reform of the Aid to Families with Dependent Children (AFDC) program into the Temporary Aid to Needy Families (TANF) program, parents receiving welfare must now work a minimum of 32 hours per week if they are able. States are required to impose financial penalties called sanctions when parents fail to meet program requirements. The TANF guidelines allow states broad flexibility in designing and implementing their Welfare-to-Work programs, and there is much variation across states. Sanctions may vary in length and range from a complete cessation of all benefits to a reduction in only a portion of the cash grant.

Parents who apply for aid in California enroll in the California Work Opportunity and Responsibility to Kids (CalWORKs) program. In the County of Los Angeles, the Welfare-to-Work component of CalWORKs is known as the Greater Avenues to Independence program (GAIN). Participation in GAIN is mandatory unless the parent is exempt from the work requirement of 32 hours per week for single parents, and 35 hours per week for married parents. Failure to comply with GAIN rules may result in a sanction. Sanctions are not intended to be mean-spirited, but are designed to compel parents to participate in work activities. GAIN provides work-related services to help parents find and keep employment and, over time, move on to higher-paying jobs so they are no longer dependent upon aid.

This chapter offers a description of the County of Los Angeles' GAIN sanctions policies and procedures, including discussions of the theoretical rationale behind sanctions and the manner in which the County's sanctions policies differ from those in place in other states.

What Are Sanctions?

Sanctions are financial penalties for failing to comply with Welfare-to-Work program requirements. The use of sanctions or financial penalties to enforce work and program requirements is a central feature of welfare reform and constitutes one of the most important policy changes under the new welfare laws. Under TANF, all states must impose sanctions when aided adults fail to comply with work requirements without good cause, but states have autonomy in imposing either full- or partial-family sanctions. In states where full-family sanctions are imposed, families that fail to comply with work requirements lose the entire welfare grant. A survey of sanctions policies conducted by the Government Accountability Office (GAO) indicates that 36 states impose full-family sanctions, and in half of these states families lose the entire welfare grant the first time an aided adult fails to comply with work requirements. By contrast, several states impose full-family sanctions after participants repeatedly fail to comply with work requirements.

Responding to the Federal welfare reform legislation, California passed Assembly Bill 1542 (AB1542) which created the CalWORKs program. Unlike the more stringent welfare reform programs implemented in most other states, California opted to continue supporting children when their parents do not comply with work requirements. Under a CalWORKs policy of partial-family sanctions, the adult portion of aid is deducted from the entire family cash grant until the participant is no longer in violation of the work requirement. A participant who has been sanctioned is required to participate in the activity that originally led to the imposition of the sanction. Only after a participant returns to compliance, by “curing” the sanction, are the full cash benefits restored to the aided family.

The Theory Behind Sanctions

All formal organizations rely on a system of sanctions to ensure behavioral compliance with organizational rules. While welfare sanctions predate welfare reform, the application of a TANF policy of sanctions has now become a central feature of a new welfare system that contractually requires clients to participate in work activities as a condition of receiving cash assistance. Sanctions are financial penalties that are imposed on welfare recipients when they do not comply with work requirements. The theory behind a welfare program based on the potential use of sanctions for participants who may fail to comply with program rules is that the ability to impose financial penalties will deter the violation of work rules and, therefore, induce participants to comply with program requirements. In accordance with the objective of this study, the research presented in this report seeks to answer the larger research question of the extent to which the policy of sanctions in the County of Los Angeles, instituted for the purpose of compelling welfare parents to participate in mandated activities, provides an incentive for program participation.

Initial Processes

When a parent applies for CalWORKs in the County of Los Angeles, the first step is a series of interviews during which an Eligibility Worker (EW) informs them of the rules and their rights, the work requirements, and the consequences of non-participation, including sanctions. The volume of information participants must grasp about existing welfare policies, such as eligibility requirements, time limits, earned income deductions, and the quarterly reporting process, can be overwhelming. However, at this initial interview, the EW tries to identify any barriers to employment and assess the participant’s need for supportive services.

An appointment is scheduled for GAIN Orientation, and a letter is sent to the participant’s mailing address with the date of the interview. This interview is mandatory for several reasons. During Appraisal, a GSW determines what kinds of employment services the participant needs, such as job training or supplemental education, and participants undergo a screening for barriers, including the need for mental health, substance abuse, learning disability, or domestic violence services. Logistical issues, such as the need for child care and transportation services are also addressed. Should

serious barriers to employment exist, the participant may be exempt from working. More frequently, when participation problems arise, it is a temporary condition, and an opportunity for the GSW to help the participant address the obstacle. Failure to appear for the Orientation interview is the first program violation that can result in a sanction.

The next required GAIN activity is Job Club. This is a four-week mandatory activity with an optional additional one-week of Voluntary Enhanced Motivation. Attending the optional fifth week is primarily up to the participant and is determined by factors such as how close the participant is to obtaining a job and whether the additional assistance will be helpful to the participant. If they are unable to find a job during this time, participants are required to participate in a Vocational Assessment. At this time, a professional assessor does a more in-depth screening for barriers to employment, work history, skills, need for supportive services, resources available, and job market prospects. During this assessment, participants are required to sign, along with their GSW, a Welfare-to-Work plan. This is an agreement to participate in Welfare-to-Work activities.

Prior to the implementation of Senate Bill (SB) 1104 on December 1, 2004, participants had 18 months from the time they signed a Welfare-to-Work plan to attend education/training and find employment. If they did not find employment they were obligated to attend Community Service to remain eligible for aid. They could request an additional 6 months grace period to complete education/training. With the implementation of SB 1104, Los Angeles County eliminated the 18/24 month welfare-to-work services clock. The requirement that those who remain unemployed at the end of this time period attend Community Service as long as they remain on aid, no longer applies.

One of the most important CalWORKs requirements is the filing of the QR 7 form showing any changes in income, family members, or address. This form must be completed, with copies of wage stubs, bills, and receipts to verify the information filed every quarter, even if there are no changes. Participants are responsible for filing this quarterly report, and are terminated if they fail to do so. Their case then remains terminated until the QR 7 form is properly submitted.

How Are Sanctions Implemented in the County of Los Angeles?

The sanction process is initiated when a participant fails to comply with any one of the GAIN program requirements, or with the terms of their Welfare-to-Work plan. The most common type of noncompliance is the failure to participate in an assigned GAIN activity, such as Orientation, Job Club, or assigned interviews with GAIN staff. Participants will be sanctioned if they refuse to sign a Welfare-to-Work plan or GAIN contract, if they do not accept a job, or if they terminate a job without good cause.

Upon discovery of an instance of noncompliance, the GSW initiates a noncompliance and updates the Los Angeles Eligibility, Automated Determination, Evaluation and Reporting (LEADER) system with an appointment date and time. With the initiation of a noncompliance, LEADER automatically generates a Notice of Action (NOA) 840 which

is sent to the participant. The NOA warns that a sanction will be imposed if the participant fails to contact the GSW within 20 days of the date the notice was sent. This 20-day period is established by State law. The purpose of this contact is to discuss the reasons for noncompliance. The NOA establishes a time frame for the participant to either attend a scheduled cause determination interview or request a change of appointment. Participants can only reschedule once and the appointment must fall within the 20-day period.

There is no Federal standard for the composition of a NOA, and they vary from state to state. In the County of Los Angeles, the first NOA informs the participant that their cash aid grant is being reduced by a certain date unless the participant contacts the GSW within the stipulated time frame. The NOA is a form letter. The GSW fills in the notification of their appointment date and checks off the appropriate choice for the cause of noncompliance.

The NOA also provides a brief description of what will happen at the interview, explaining that if the participant has a good reason for not following GAIN program requirements, the adult portion of their cash grant will not be reduced or stopped. The participant is given the option of either appearing in person or contacting the GSW by telephone. Included in this letter is a new computation of the amount of cash aid the participant will receive if the sanction is imposed.

The NOA notices are printed in English and Spanish. Additionally, the LEADER system is programmed to suppress the issuance of an NOA when the participant's primary language is other than English or Spanish, and to generate an alert for the eligibility staff to manually issue the sanction NOA in the appropriate language.

If a participant misses a scheduled appointment, the GSW attempts to contact the participant by telephone the following day. This contact is critical because if a noncompliant participant does not respond within the 20-day period, the participant's records are automatically updated with a sanction. Nevertheless, these attempts to establish contacts are not always successful, particularly if the participant moved, provided only a message phone number, or if they failed to notify the GSW that their telephone has been disconnected. Therefore, in defining program expectations and obligations to the participant, it is crucial to impress upon the participant the importance of maintaining current contact information.

When a Participant is Noncompliant

When a participant is informed that they are noncompliant, they are expected to provide documentation of "good cause" to substantiate the reason for being out of compliance with program rules. An example of this is a doctor's letter confirming illness as a reason for not being able to work. GAIN program guidelines provide a complete list of good cause criteria, but among the reasons for good cause are domestic violence, mental or physical disability, and unavailability of needed supportive services or child care. Good cause criteria also includes proof of discrimination in the workplace, travel time in

excess of two hours (or two miles if walking is the only form of transportation available), work activity that violates the participant's union membership, employment that does not offer to provide for workers' compensation, or activity that would interrupt an educational or job training program in progress.¹

A "good cause" determination interview is scheduled to allow the noncompliant but yet sanctioned participant an opportunity to show good cause for failure to follow GAIN program requirements. The program guidelines allow a certain amount of individual discretion on the part of the GAIN Services Supervisors (GSSs) in determining whether a participant has good cause for noncompliance.

The GSW may also use the "good cause" interview to further assess for barriers. Participants may not always acknowledge barriers to working in initial interviews. Sometimes participants may be unaware of how personal and family responsibilities can interfere with working until they attempt to work or participate in program activities and fail in their endeavors. Acknowledging the barriers provides staff with an opportunity to work with participants to address the problems.

If the participant claims "good cause", they are required to provide documentation as to why they should be exempt from program requirements. This documentation must be in written form from the appropriate party and, when possible, it must be on the appropriate letterhead. The documentation must also give the date, information about the person supplying the information, and the reason for the noncompliance in question. Third-party verbal documentation is acceptable only when written verification cannot be obtained. In the absence of both verbal and written documentation, a sworn statement may also be accepted if the GSW and the GSS agree.

When "good cause" is determined, the GSW notifies the GAIN coordinator that the participant needs to be exempted from the work requirement. They may be assigned a different activity, or exempted, and the GSW may arrange for additional supportive services for the participant. The "good cause" criteria are reviewed by the GSW not less than every three months.

If a determination is made that good cause does not exist, the GSW meets with the participant to work out a Compliance Plan to bring the participant back into compliance. This plan is agreed to and signed by both the GSW and the participant. Should the participant refuse to enter into a Compliance Plan, the GSW has no choice but to generate the sanction notice. If there are two parents in the case, a notice of noncompliance is sent to the other parent to allow them an opportunity to comply and avoid the sanction by working 35 hours per week, unless they already are working these hours or have a basis for exemption.

Imposition of Sanctions

When a GAIN participant fails to comply with GAIN requirements without good cause, and the compliance process has been unsuccessful in resolving the problem, financial

sanctions must be imposed. The length of the sanction is based on the participant's noncompliance. A participant's aid is restored effective the date the participant cures the sanction, i.e., fulfills their obligations. The purpose of the sanction is not to be punitive but to encourage participation in a program designed to help reduce dependence on aid. A participant who has been sanctioned is deregistered from GAIN by the GSW on the 21st calendar day after the issuance of the NOA 840.

Curing a Sanction

When participants decide to return to compliance, they can petition to have their cash aid portion restored. A priority appointment is scheduled for the sanctioned participant to re-enter the GAIN program. The LEADER program sends out a notice to provide participants with an opportunity to cure their sanction. The notice states that to reenter or resume the GAIN program, the participant must attend a post-sanction interview and agree to perform the activity they previously failed to perform. Once the participant signs another GAIN contract or Welfare-to-Work plan, they are again registered in the GAIN program, and the adult portion of their cash aid resumes.

Fair Hearings and Other Remedies

If a participant feels they have been sanctioned in error, they may appeal the decision. Benefits cannot be reduced or stopped without a hearing, unless the participant fails to attend the hearing. While participants are advised of their responsibilities and rights in contesting sanctions decisions, both verbally and in writing, many times throughout their participation in GAIN, it is important to impress upon them that they must keep good records and save copies of any documents in case of a hearing. Should they lose or misplace documents, they have the right to make copies of anything in their DPSS files that might help them in a hearing. Appealing the disputed decision can be done through several venues.

The participant may request a State Hearing, which is outlined in Division 22 of the State Manual of Policies and Procedures.² State Hearings are available to all participants wishing to appeal any action taken by the GAIN staff, but they must do so within 90 days from when the action occurred. Should they request a State Hearing, they can do so in writing or verbally.

Participants who feel they have been sanctioned in error may also file a Formal Grievance Based on the Unemployment Insurance (UI) Code.³ These are conducted by GSWs, using the policies and procedures in Section 5302 of the State Unemployment Insurance Code. Grievances must be filed not later than 10 workdays from the occasion of the action in question. Participants may appeal the UI Code decisions to the Appeals and State Hearing (ASH), but may not use the UI Code to appeal State decisions.

Participants may also file a Formal Grievance as Established by the County Board of Supervisors (County Formal Grievance). These hearings are conducted by DPSS'

Appeals and State Hearing (ASH) Section staff, using policies and procedures approved by the County of Los Angeles Board of Supervisors. The grievance must be filed within 30 days. Participants who decide to use the County formal grievance process may appeal the decisions of a UI Code Hearing, but not a State hearing.

Conclusion

This chapter has described the steps involved in imposing partial-family sanctions on noncompliant Welfare-to-Work participants in the County of Los Angeles, and the steps these participants must take to cure sanctions.

One of the general programmatic thrusts of welfare reform is to more closely link receipt of cash assistance to labor market participation. Sanctions represent a practical mechanism through which this linkage is strengthened. Sanctions are not intended to be overly penal and harsh, but instead are designed to encourage Welfare-to-Work participants to engage in work activities and follow a path to self-sufficiency.

In opting to use sanctions that preserve the child's portion of the CalWORKs cash grant, and only deduct from the adult portion, the State of California has implemented a partial family sanctions policy that is among the most lenient in the United States. However, in keeping with TANF reforms, welfare is now a time-limited entitlement contingent upon participation in Welfare-to-Work activities. Sanctions are a tool to compel participants to comply with program requirements that are in place and are designed to promote the skills the participant needs to find and keep employment.

Endnotes

¹ A complete listing of the types of good cause criteria is given in the GAIN Program Handbook (County of Los Angeles Department of Public Social Services. *L.A. GAIN Program Handbook*. Section 1321.3 and 1321.4. Issued February 26, 1999).

² The State Manual of Policies and Procedures is available from the State of California, Department of Social Services, Office of Regulations Development, 744 "P" Street, Mail Station 7-192, Sacramento, CA 95814-6413 or at the State of California, Department of Social Services website at: http://www.dss.cahwnet.gov/ord/CDSSManual_240.htm

³ Unemployment Insurance (UI) Code is available on the State of California, California Unemployment Insurance Appeals Board website at: <http://www.cuiab.state.ca.us/precedentdecisions.shtml>

CHAPTER III

Who Are the County of Los Angeles' Sanctioned CalWORKs Participants and What Are Their Sanction Rates?

What are the demographic and background characteristics of the sanctioned Welfare-to-Work population in the County of Los Angeles? This chapter analyzes administrative data from the period between April 2002 and February 2004 in order to answer this question. The characteristics of sanctioned participants are drawn out by comparing them with participants who were never sanctioned. Some of the never sanctioned participants were always in compliance; others in the same group were noncompliant, but returned to compliance within 21 days and thus were not sanctioned. In addition, this chapter examines the County's sanction rates in several different ways, and describes the amount of time it takes noncompliant participants to become sanctioned and to cure their sanctions.

Study Populations

The descriptive analysis presented in this chapter covers 37,432 GAIN participants who registered in GAIN from April 2002 to September 2003, and were followed through February 2004. Out of this population, 9,533 participants experienced at least one sanction during this period. The remaining 27,899 participants were never-sanctioned. The never-sanctioned population consists of two sub-groups: 1) 17,484 participants within the never sanctioned population became noncompliant at least once; and 2) 10,415 participants within the never sanctioned population remained compliant.

The analysis of the frequency of sanctions or sanction rates covers the period between April 2002 and February 2004. Since the data on the sanctions imposed on participants earlier than 2002 are not reliable, they are not presented in the analysis.¹

Demographic Composition and Characteristics of Sanctioned Participants

In this section, the demographic composition of GAIN participants in the County of Los Angeles is presented. The characteristics of these sanctioned participants are compared with those of participants who were never sanctioned between April 2002 and February 2004. This comparison highlights differences and similarities between these two groups.

Table 3.1 shows that, on average, the age composition of both groups is similar, with sanctioned participants being only slightly younger by one year than participants who complied with GAIN program requirements.

The data also suggests the proportion of sanctioned participants is higher among Latino participants (53.7 percent) than any other ethnic group, followed by African-American participants (24.9 percent). It should be noted, however, as shown in Table 3.1, that

Latino and African-American participants also constitute the highest proportions among the never sanctioned population because they are a higher proportion of CalWORKs population in general. These tables show minor differences in demographic characteristics such as ethnicity, age and education between the sanctioned and the never sanctioned participants. The association between these variables and sanctions is examined in more detail in the next chapter on multivariate analysis.

Most of the sanctioned population had a high school diploma (38.8 percent). Approximately one-fifth of the sanctioned population had attended college, and over one-tenth had not completed high school. Examining the data for welfare clients who were never sanctioned shows a somewhat similar distribution for high school education. However, a slightly higher proportion of the never sanctioned population had attended some college (26.8 percent) compared with sanctioned population (21.2 percent).

The average number of persons living in sanctioned households was approximately 3.6, compared with 3.3 for the non-sanctioned population. The distribution of the number of children by age group is similar for both sanctioned and non-sanctioned participants.

The majority of the participants in each of the two groups were single parents, with the sanctioned group having a higher proportion than the non-sanctioned group (66.2 percent versus 57.6 percent). The sanctioned group had a lower proportion of married participants compared with the never sanctioned population (23.1 percent versus 29.2 percent).

Table 3.1 indicates that 82.8 percent of the sanctioned participants spoke English as their primary language, and 15.9 percent spoke Spanish. The remaining participants spoke Asian or Other languages. Examining the data on the primary language spoken by participants who were never sanctioned during the study period shows that three quarters (74.9 percent) of these participants spoke English, 17.0 percent spoke Spanish, 4.2 percent spoke Armenian, 3.1 percent spoke Asian or Other languages, and less than one percent (0.8) spoke Vietnamese.

Table 3.1

**Demographic Characteristics of Sanctioned and Never¹ Sanctioned
GAIN Participants, April 2002 – February 2004**

	Sanctioned (N = 9,533)	Never Sanctioned (N = 27,899)
Mean Age (SD) - as of April 2002	30.2 (9.0)	31.2 (9.8)
Age (%)		
18-25	38.4	35.2
26-35	34.3	31.7
36-45	20.7	24.0
46-65	6.6	9.1
Gender (%)		
Male	33.8	26.7
Female	66.2	73.3
Ethnicity (%)		
White	15.0	20.5
African-American	24.9	23.0
Latino	53.7	48.3
Asian/Other	6.4	8.2
Education (%)		
Less than High School	11.8	12.7
Some High School, No Diploma	21.1	16.5
High School Diploma	38.8	38.3
Vocational School	7.1	5.7
College or More	21.2	26.8
Mean Household Size (SD)	3.6 (1.6)	3.3 (1.4)
Mean Number of Children on Aid (SD)	1.9 (1.1)	1.8 (1.0)
Age Group of Children in Household (%)		
Under 1	18.7	20.1
1 – 5	33.6	31.8
6 – 12	33.4	32.2
13 – 18	14.3	15.9
Marital Status (%)		
Currently Married	23.1	29.2
Divorced	2.6	3.0
Separated	5.3	5.4
Single	66.2	57.6
Other	2.8	4.8
Primary Languages (%)		
English	82.8	74.9
Spanish	15.9	17.0
Armenian	0.5	4.2
Vietnamese	0.1	0.8
Asian/Other	0.7	3.1

¹Never sanctioned participants includes GAIN participants who were noncompliant, but returned to compliance within 21 days and participants who were always compliant.
SD = standard deviation of the mean.

Source: DPSS; GEARS, LEADER 2002-2004. Cumulative Sanction File February 2004.

Demographic Characteristics of Never Sanctioned Noncompliant and Always Compliant Participants

Table 3.2 presents the demographic and background characteristics of GAIN participants who followed all the GAIN program participation rules during all of their months in GAIN between April 2002 and February 2004. The table provides comparative data for participants who were not in compliance with Welfare-to-Work program requirements during at least one month in the study period. Noncompliant participants are a subset of the never-sanctioned population.

Participants who were noncompliant during any given month in the study period were, on average, similar in age (31 years) to clients who were always in compliance. The compliant group contained a larger proportion of older participants compared with the noncompliant group.

Half (50.1 percent) of the noncompliant participants were Latinos, followed by African-Americans (27.6 percent), Whites (16.1 percent), and participants in the Asian/Other category (6.2 percent). The compliant group contains higher proportions of the White (27.8 percent) and Asian/Other (11.6 percent) participants when compared with the noncompliant population.

The descriptive statistics presented in Table 3.2 show that approximately 11 percent of the noncompliant population had less than a high school education, 38.2 percent had a high school diploma, and 26.4 percent had some college education. The educational distribution of the compliant population was similar to the noncompliant population.

The statistics on the average number of persons in a household for each of the two groups are similar. The noncompliant population had an average of 3.4 persons per household and the compliant population had an average of 3.3 persons per household.

The statistics on marital status show that about one-quarter of the noncompliant population was married. Single parents made up almost two-thirds of the noncompliant group, and the balance of the noncompliant population was divorced or separated. Examining the data for the compliant population shows a different pattern: more than one-third of this population was married and slightly less than half were single parents.

Table 3.2

**Demographic Characteristics of Compliant and Noncompliant
GAIN Participants, April 2002 – February 2004**

	Noncompliant (N = 17,484)	Compliant (N = 10,415)
Mean Age (SD) (as of April 2002)	31.5 (10.4)	31.2 (9.8)
Age (%)		
18-25	35.3	35.1
26-35	33.5	28.6
36-45	23.0	25.8
46-65	8.2	10.6
Gender (%)		
Male	26.9	26.5
Female	73.1	73.5
Ethnicity (%)		
White	16.1	27.8
African-American	27.6	15.5
Latino	50.1	45.1
Asian/Other	6.2	11.6
Education (%)		
Less than High School	11.4	15.2
Some High School	18.0	13.6
High School Diploma	38.2	38.3
Vocational School	6.0	5.6
College or More	26.4	27.3
Mean Household Size (SD)	3.4 (1.5)	3.3 (1.4)
Mean Number of Children on Aid (SD)	1.8 (1.0)	1.7 (1.0)
Age Group of Children in Household (%)		
Under 1	18.6	22.9
1 – 5	33.3	29.1
6 – 12	32.8	31.0
13 – 18	15.3	17.0
Marital Status (%)		
Currently Married	24.2	37.7
Divorced	3.1	2.9
Separated	5.5	5.2
Single	62.3	49.6
Other	4.9	4.6
Primary Languages (%)		
English	83.3	60.6
Spanish	15.9	19.0
Armenian	0.3	10.6
Vietnamese	0.1	2.0
Asian/Other	0.4	7.8

SD = standard deviation. Source: DPSS; GEARS, LEADER 2002-2004. Cumulative Sanction File February 2004.

Roughly 83 percent of the participants who were noncompliant for at least one month during the study period spoke English as their primary language. Approximately 16 percent spoke Spanish as their primary language. A combined total of less than one percent of the noncompliant participants spoke Armenian, Vietnamese, or Asian/Other languages. An examination of the data on primary language among the 10,415 participants who were always compliant during the study period shows a rather different pattern. Sixty percent of these participants spoke English, followed by Spanish (19.0 percent) and Armenian (10.6 percent). Asian/Other languages were spoken by almost ten percent of the compliant population.

Participation in Welfare-to-Work Activities

Table 3.3 shows the last GAIN activity attended or scheduled prior to a sanction or a noncompliance incident. Noncompliance incidents are tabulated only for participants with noncompliance histories. This included the sanctioned participants and the noncompliant but not sanctioned participants. The data shows that 64.5 percent were sanctioned because they failed to attend Orientation. Among this group, very few (8.3 percent) had completed an Orientation session prior to their current sanction, whereas the remaining 56.2 percent had no previous attendance in Orientation. Another 15.1 percent were sanctioned after they were referred to a Job Club or a Job Search in their most recent activity in the GAIN program. The remaining 20 percent were sanctioned at various other points in time in the GAIN program.

Table 3.3		
Last GAIN Activity Attended or Scheduled Prior to a Sanction or Noncompliance Incidence, April 2002 – February 2004		
	Sanctioned Population (N = 9,533)	Noncompliant Population (N = 17,484)
Did not attend Orientation before the current noncompliance incidence (%)		
No previous attendance in Orientation	56.2	50.7
At least one previous attendance in Orientation	8.3	11.9
Referred to Job Club / Job Search (%)	15.1	11.0
Employment (%)	7.7	10.1
Orientation – Completed (%)	7.2	8.7
Self Initiated Program (%)	2.0	2.0
Specialized Supportive Services (%)	1.5	2.2
Training (%)	.8	1.2
Other (%)	1.2	2.2
Total	100.0	100.0

Source: DPSS; GEARS 2002-2004. Note: Compliant population not applicable in this table.

The data reveal that most sanctioned participants are sanctioned before participating in a GAIN activity. This is also the case for incidents of noncompliance. The majority of noncompliance incidents (62.6 percent, [50.7+11.9]) take place when the participants fail to complete Orientation. These findings suggest that the main intervention to reduce sanctions and noncompliance should be made during or before the Orientation or Appraisal of participants.

Table 3.4 shows that the participation of sanctioned and never-sanctioned participants in Welfare-to-Work activities differs significantly. Approximately 5 percent of all sanctioned participants completed a Job Club; among never sanctioned participants the rate of completion was more than twice as high (10.9 percent). The never-sanctioned group also had a higher rate of utilizing specialized supportive services (7.6 percent versus 3.8 percent), and involvement in training activities was 9.9 percent for the never sanctioned participants versus 2.9 percent for the sanctioned participants. Half of the never-sanctioned group, versus 39.8 percent of the sanctioned group, received transportation assistance. Lastly, 20.5 percent of the non-sanctioned participants, versus 11.3 percent of the sanctioned group, received child care services. The contribution of these activities to the likelihood of being sanctioned is important and examined closely in the next chapter.

Table 3.4		
Participation in Welfare-to-Work Activities Among Sanctioned and Non-Sanctioned GAIN Participants, April 2002 – February 2004		
	Sanctioned Population (N = 9,533)	Non-Sanctioned Population (N = 27,899)
Job Club (%)		
Participated – Completed	5.1	10.9
Participated – Did Not Complete	6.7	5.2
Did Not Participate	<u>88.2</u>	<u>83.9</u>
	100.0	100.0
Utilized Child Care Services (%)		
Yes	11.3	20.5
No	<u>89.7</u>	<u>79.5</u>
	100.0	100.0
Enrolled in Self Initiated Program (%)		
Yes	4.9	8.5
No	<u>95.1</u>	<u>91.5</u>
	100.0	100.0
Received Specialized Supportive Services (%)		
Yes	3.8	7.6
No	<u>96.2</u>	<u>92.4</u>
	100.0	100.0
Utilized Transportation Services (%)		
Yes	39.8	50.4
No	<u>60.2</u>	<u>49.6</u>
	100.0	100.0
Received Training¹ after Completing Job Club and Assessment (%)		
Yes	2.9	9.9
No	<u>97.1</u>	<u>90.1</u>
	100.0	100.0

¹ Training includes vocational, ESL classes etc. Source: DPSS; GEARS 2002-2004.

Employment Experience and Earnings Among Sanctioned and Non-Sanctioned Participants

In this section, the employment experience of sanctioned and non-sanctioned participants is compared in order to examine the association between sanctions and the economic status of participants. Employment experience is tracked for one year prior to registration in GAIN. The data tabulated in Table 3.5 shows that the employment experience of sanctioned and non-sanctioned GAIN participants is generally quite

similar. Almost three-quarters of sanctioned and non-sanctioned participants were not employed in the year before their registration in GAIN. Only approximately 10 percent of both populations worked three or four quarters during this time. Thus, participants who registered in GAIN after April 2002 tended to enter welfare with almost no recent work experience. It should be noted that a higher proportion of unemployed participants are observed in both groups possibly because they were younger and had not found any employment yet. The higher unemployment rate among non-sanctioned participants also suggests that compliance is associated with factors other than employment. This issue is examined in the next chapter.

Table 3.5 also shows the employment and earnings of GAIN participants before and after registering in GAIN. The figure illustrates that the mean earnings and household incomes of sanctioned and non-sanctioned groups are quite similar. However, after registering in GAIN, as expected, the employment experiences of both groups improve. The employment rate increased for both populations, but the increase was higher for the non-sanctioned group.

	Sanctioned GAIN Participants (N = 9,533)	Non-sanctioned GAIN Participants (N = 27,899)
Employment and Earnings One Year Prior to Entering GAIN (%)		
Not Employed	74.6	78.1
Length of Employment		
One Quarter	7.9	7.3
Two Quarters	6.4	5.1
Three Quarters	4.3	3.6
Four Quarters	6.8	5.9
Total	100.0	100.0
Mean Earnings	\$1,639.4	\$1,726.5
Mean Household Income	\$2,676.7	\$2,486.5
Employed While Registered In GAIN		
Yes	34.9	37.5
No	65.1	62.5
Total	100.0	100.0

¹ Among participants entering the GAIN Program between April 2002 and September 2003 and tracked through February 2004. Source: DPSS; LEADER and State Unemployment Insurance Records 2001-2004.

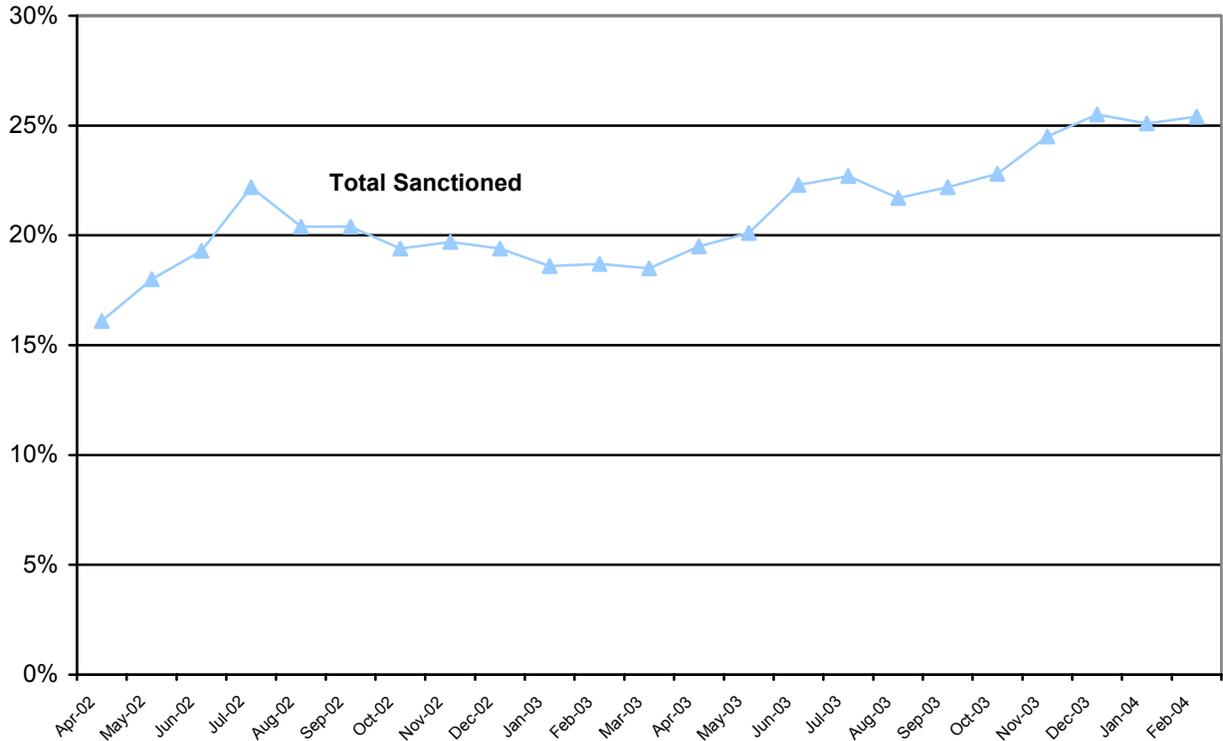
What Are the Sanction Rates of CalWORKs Participants?

In 2002, the Research and Evaluation Services unit of the CAO conducted a study on the impact of welfare reform on families and communities during the first 21 months of its implementation in the County.² This study reported that the number of participants sanctioned for failure to meet work requirements immediately following the implementation of CalWORKs was relatively low. During the month of April 1998, there were 4,215 participants who were sanctioned for breach of GAIN program rules. The number of total sanctions in effect more than tripled, from 4,215 to almost 13,000, by October 1999. Over the same period, the number of GAIN participants more than doubled.

The gradual start and rapid increase in the application of Welfare-to-Work sanctions during the first 18 months of CalWORKs must be understood within the context of program implementation. In addition to the rapid increase in the number of GAIN participants registered in the program during the first two years of the implementation of CalWORKs, the knowledge of GSWs in understanding, detecting, and applying sanctions to cases expanded over time. The 2002 CAO report on the impact of welfare reform on families and communities concluded that it was plausible to argue that increased GSWs knowledge of program requirements had played a role in the increase in the number of persons penalized for failure to meet Welfare-to-Work requirements during the period of time following the implementation of CalWORKs.

Figure 3.1

**Trend of Sanction Rate in the GAIN Program
Between April 2002 and February 2004**



Source: DPSS; GEARS, 2002-2004. Cumulative Sanction File February 2004.

Figure 3.1 provides a time series analysis of the sanction rate for all GAIN participants who were in sanctioned status between April 2002 and February 2004. In the present study, the sanction rate is defined as the ratio of sanctioned participants to the total of sanctioned and non-sanctioned participants. Non-sanctioned participants include only the participants mandated to participate the GAIN program activities in a given month. Exempt participants are not included in the analysis.

$$\text{Sanction Rate} = \frac{\text{Sanctioned Participants}}{(\text{Sanctioned Participants} + \text{Mandatory Participants})}$$

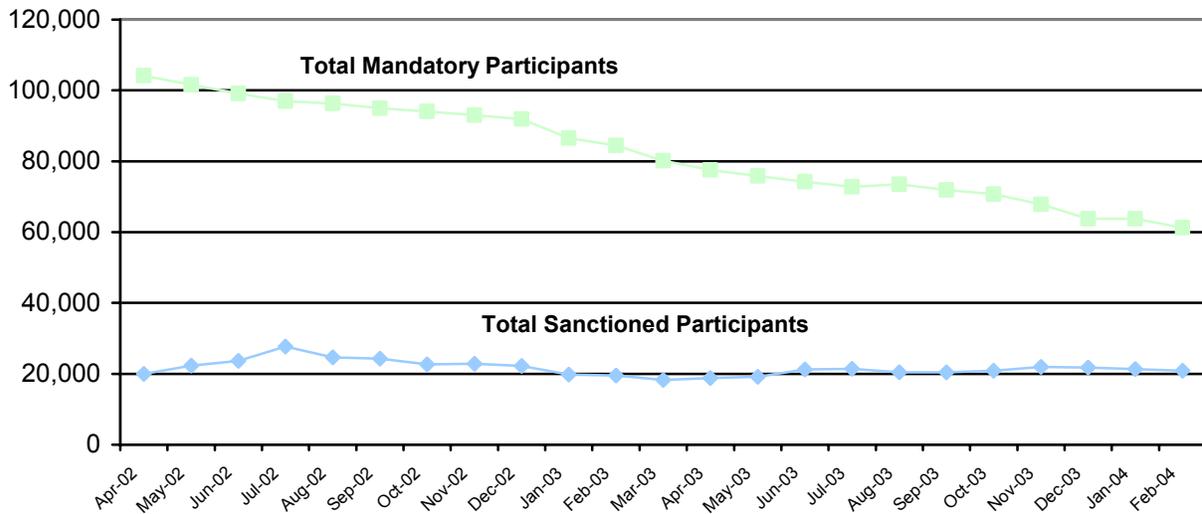
The monthly sanction rate for GAIN participants fluctuated from a low of 16 percent in April 2002 to a high of 25 percent in February 2004. The number of sanctioned participants increased by 4 percent (from 19,997 to 20,851), between April 2002 and February 2004. The number of sanctioned participants remained almost constant during this period and the sanction rates increased because of the steady decline in the welfare caseload.

After a steady increase during the first quarter of the study period, sanction rates among all the GAIN participants declined during the next eight months. Since May 2003, the sanction rate for all GAIN participants increased steadily from about 15 percent to 25 percent in February 2004.

It should be noted that monthly sanction rates shown in Figure 3.1 includes all participants enrolled in the GAIN program in a given month. This included participants who entered the welfare system before and after the implementation of welfare reform in January 1998, as shown in Figure 3.2. The sanction rates for participants who entered the program before the welfare reform (pre-reform participants) was much higher than the sanction rate for participants who entered the program after the implementation of the CalWORKs. Over time, the exit rate of pre-reform participants increased significantly and was accentuated with the imposition of time limits. As a result, the sanction rate for the pre-reform group continued to increase. Since post-reform participants left aid at a slower rate, their sanction rate did not increase at the same pace.

Figure 3.2

**Number of Mandatory and Sanctioned GAIN Participants
Between April 2002 and February 2004**



Source: DPSS; GEARS, 2002-2004. Cumulative Sanction File February 2004.

There are two critical implications of this difference between pre- and post-reform participants. First, the sanction rate for the GAIN population overall is elevated by the higher sanction rate for pre-reform participants. As these long-term participants exit welfare, the overall sanction rate is expected to drop to the rate of post-reform participants, which has remained steady at about 20 percent.

A second issue to consider in this context is where the County of Los Angeles stands, both in relation to the State of California as a whole and in relation to other large counties within the State, in terms of how sanction rates have changed over the period from April 2002 to February 2004. Table 3.6 gives the number of mandatory Welfare-to-Work enrollees and the sanction rates for the State of California and its five most populous counties for April 2002 and February 2004. Over this period, the number of mandatory Welfare-to-Work participants in the State dropped by 24 percent from 277,025 to 210,419. At the same time, the sanction rate for the State grew from 15.6 to 21.2 percent.

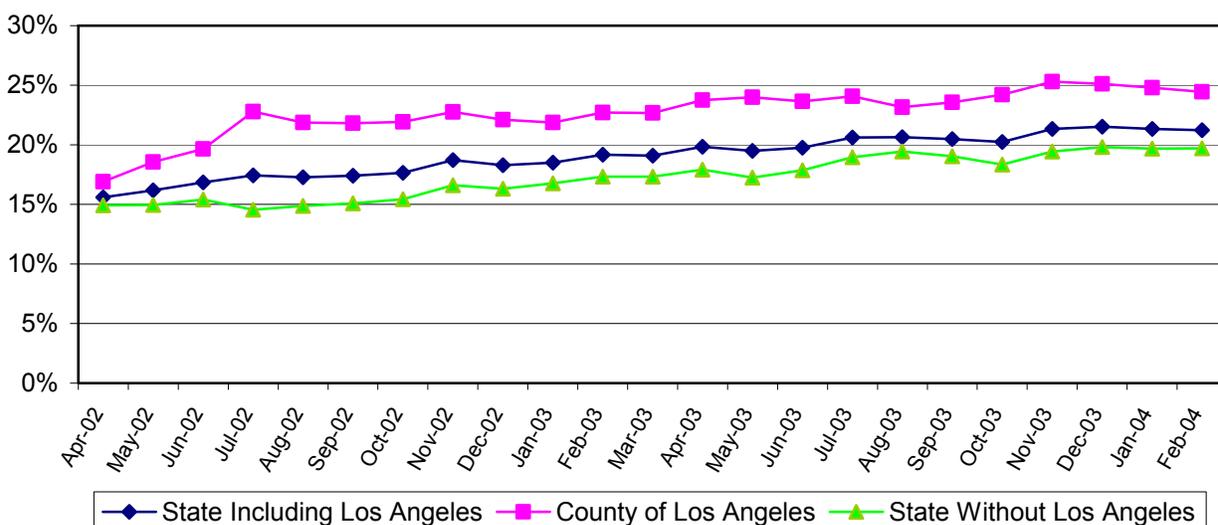
	Mandatory Enrollees		Sanction Rate	
	April 2002	February 2004	April 2002	February 2004
Statewide	277,025	210,419	15.6	21.2
Statewide (Excluding Los Angeles)	184,215	145,649	14.9	19.7
Los Angeles	92,810	64,770	16.8	24.4
Orange	11,271	6,726	8.1	14.9
San Diego	10,046	7,066	17.2	26.5
San Bernardino	24,826	18,793	10.6	16.7
Riverside	9,264	8,209	27.9	22.1

Source: California Department of Social Services, W25 and W25a Files.

Like the State as a whole, each of its five largest counties witnessed fairly sizable declines in the number of mandatory enrollees between April 2002 and February 2004, and with the exception of Riverside, each of these counties experienced an increase in their sanction rates over this period. The County of Los Angeles experienced an 7.6 percent increase in its sanction rate, from 16.8 percent to 24.4 percent, and this was the second largest increase behind San Diego County. Riverside County's sanction rate dropped from almost 28 percent in April 2002 to 22 percent in February 2004. The table shows that the monthly sanction rate for the County of Los Angeles is not very different from other counties in the State. Also, the County of Los Angeles' rate of increase between April 2002 and February 2004 is similar to other counties with the exception of Riverside, where the sanction rate might have fallen due to a very high starting point. The numbers imply that as the pre-reform population exits welfare, the sanction rate of the County of Los Angeles is likely to converge to the State average. Figure 3.3 compares the change in sanction rates of the State and County of Los Angeles between April 2002 and February 2004.

Figure 3.3

Monthly Sanction Rates of Welfare Recipients in California and County of Los Angeles , April 2002 – February 2004



Source: California Department of Social Services, W25 and W25a Files.

Cohort Sanction and Curing Rates

In this section, two cohorts of participants are studied to show their sanction and curing trends. A cohort analysis provides a clear understanding of how the sanction and curing rates of participants change over time. The cohort study also illustrates how long it takes to be sanctioned, and how long it takes to be cured after being sanctioned. The biggest advantage of this type of cohort analysis is that the subjects of the study are comparable since their starting point and length of exposure to the program are the same.

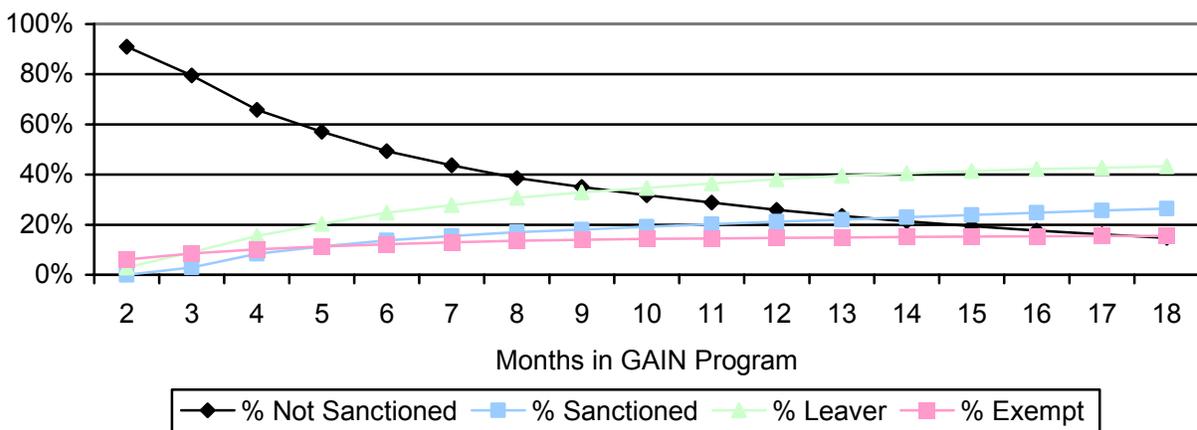
Two separate cohorts were studied to analyze the dynamics of being sanctioned and cured. The first cohort comprised of a six-month entry cohort of 12,511 participants who registered in GAIN for the first time between June and November 2002. These participants were tracked for 18 months to study the amount of time to their first sanction. This cohort had a GAIN history of eighteen months. The second cohort also comprised of a six-month sanctioned cohort of 2,133 participants who were sanctioned for the first time between September 2002 and February 2003. These participants were tracked for 12 months to examine their time to cure their sanction.

The change in program status among the first cohort of 12,511 participants is illustrated in Figure 3.3. Participants in this cohort are tracked until they deregister from GAIN as sanctioned or exempt participants, or leave the GAIN program. The figure shows that

the cumulative percentage of those who were sanctioned following their registration increases at a higher rate during the earlier months and at a lower but stable rate thereafter. The cumulative sanction rate increased from 3 percent in the third month to 14 percent in the sixth month. By the end of the 18-month period in GAIN, a total of 3,312 participants were sanctioned (27 percent). This means that approximately 1 out of 4 GAIN participants are expected to be sanctioned within 18 months following their registration. Over 50 percent of these participants were sanctioned in 6 months, and 80 percent were sanctioned within a year. Figure 3.4 also shows the cumulative percentages for those participants who left or became exempt after registering in GAIN. By the eighteen month into the GAIN program, 27 percent of these participants were sanctioned, 43 percent left aid, and another 15 percent were exempted following their registrations.³

Figure 3.4

Change in Program Status Among a Cohort of Participants Entering the GAIN Program Between June and November 2002



Source: DPSS; GEARS, 2002-2004. Cumulative Sanction File February 2004.

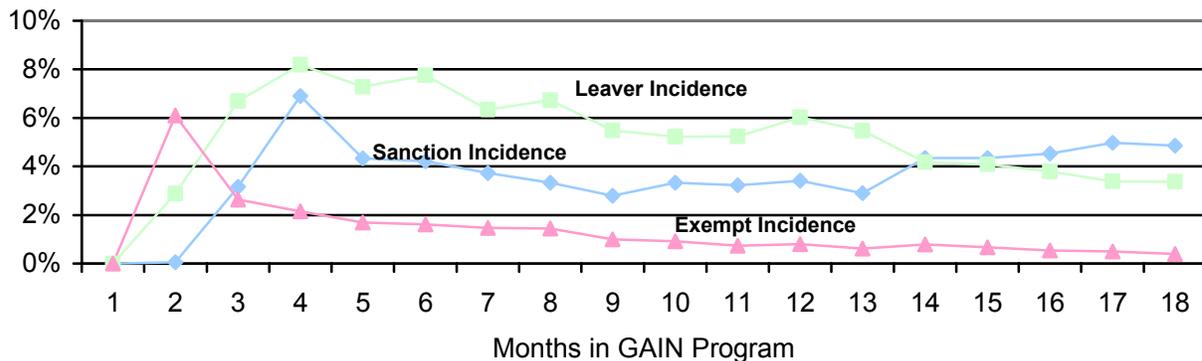
Figure 3.5 shows the sanction incidence rates. For calculating this rate, the denominator includes participants who are still in GAIN and not sanctioned by the beginning of the month. The numerator is the number of participants sanctioned during that month. We may also refer to this rate as the cohort sanction hazard rate since this rate shows the conditional probability of being sanctioned for participants at a specific time, given that they were not sanctioned until that time. Figure 3.5 shows that the sanction incidence rate for cohort participants increased steeply in the earlier months. The sanction rate increased to 7 percent after 3 months and then started decreasing during the next ten months. After reaching 3 percent by the end of the first year, the

sanction incidence rate began to increase again and reached 5 percent by the eighteenth month.

Figure 3.5 also illustrates the incidence rates for leaving aid and becoming exempt after registering in GAIN. These rates also increased sharply in the early months and started to decline continuously afterwards. They provide a better perspective with which to interpret sanction incidence rates. While the majority of GAIN participants exit aid continuously, a stable number of participants are sanctioned every month (new sanction incidents). Consequently, since the “at risk” population (i.e., those who are still registered in GAIN) decreased over time, the sanction incidence rate started to increase later for those who were still registered in GAIN for over one year. Overall, however, the highest sanction incidence rates were observed in the fourth month of registration in the GAIN program.

Figure 3.5

Sanction Incidence Rate Among a Cohort of Participants Entering the GAIN Program Between June and November 2002

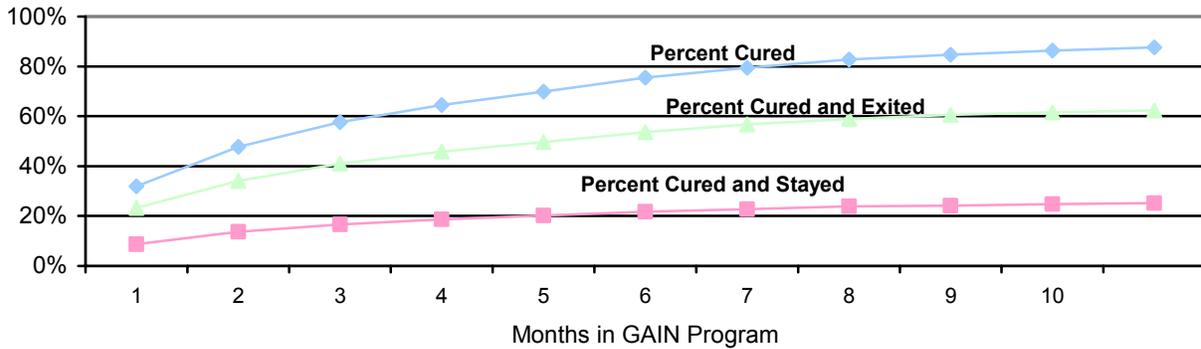


Source: DPSS; GEARS, 2002-2004. Cumulative Sanction File February 2004.

Figure 3.6 shows the cumulative percentages of curing among a cohort of 2,133 participants who had a first sanction between September 2002 and February 2003. There were two possible outcomes for this cohort: A participant either returned to GAIN by complying, or exited aid and thereby ended their sanction simultaneously. Figure 3.6 shows these two different curing options separately. A combined curve that includes both options shows that almost 88 percent of sanctioned participants were cured by the end of their first year of being sanctioned. Hence, by the end of one year, only 12 percent of the sanctioned participants in the cohort remained sanctioned. It should also be noted that another 8 percent were cured but were then sanctioned for a second time. Hence, about one out of every five sanctioned participant was still sanctioned by the end of the first year.

Figure 3.6

Program Status Over Time (Cumulative) Among a Cohort of Participants Sanctioned Between September 2002 and February 2003

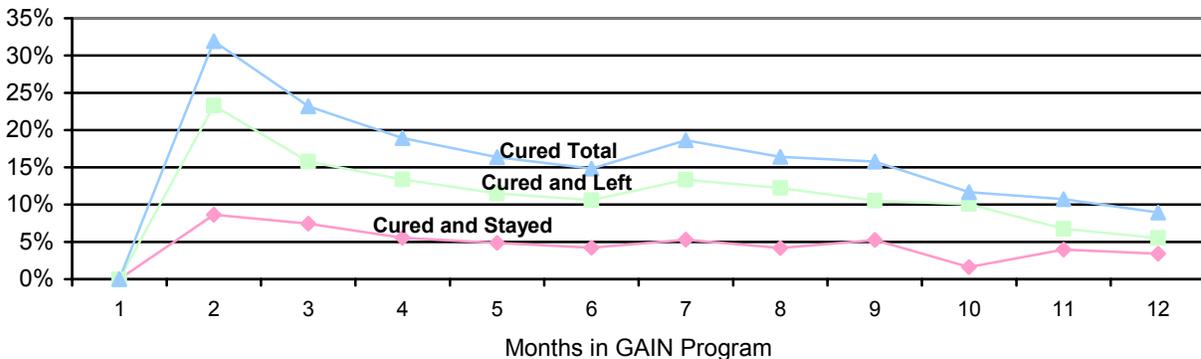


Source: DPSS; GEARS, 2002-2004. Cumulative Sanction File February 2004.

Finally, Figure 3.7 shows the curing rates among sanctioned participants. The curing rate increases in the second month and declines thereafter. This rate exceeds 30 percent in the second month and drops below 10 percent by the end of the first year. The figure shows that more than half of the sanctioned participants were cured in three months. However, the majority of those who ended their sanctions also left CalWORKs aid in the same month. The curing statistics suggest that sanctioned GAIN participants either return to compliance or exit aid very rapidly after being sanctioned.

Figure 3.7

Monthly Change in Program Status Among a Cohort of Participants Sanctioned Between September 2002 and February 2003



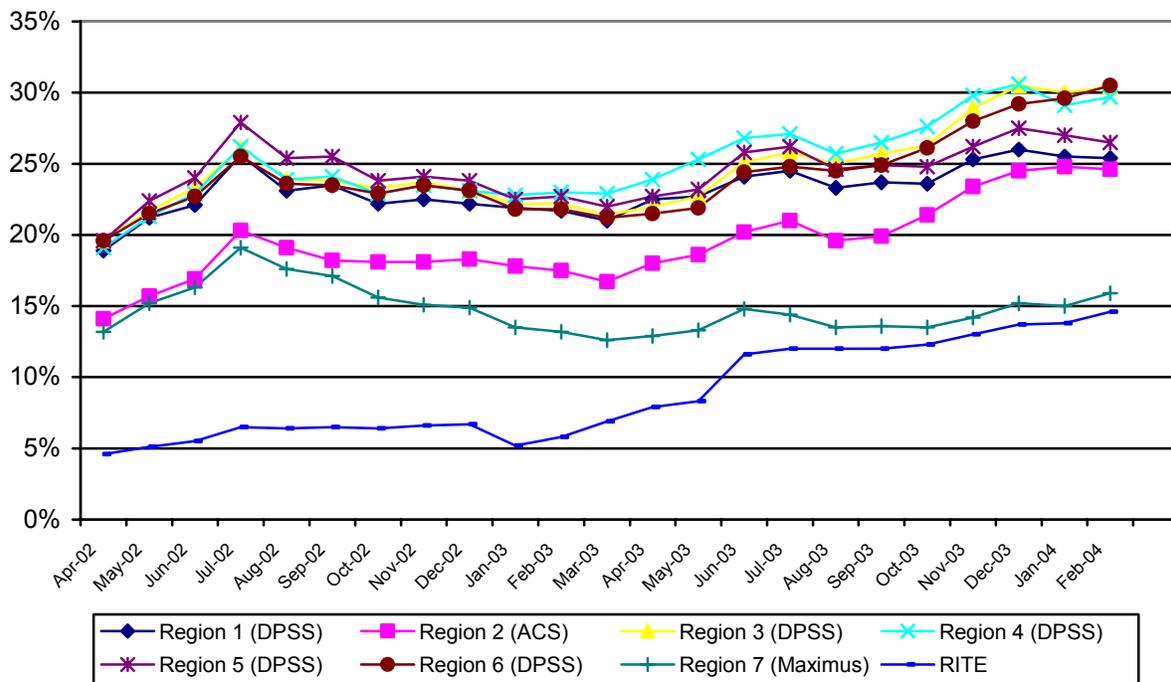
Source: DPSS; GEARS, 2002-2004. Cumulative Sanction File February 2004.

Sanction Rates in GAIN Regions and RITE Program

Figure 3.8 shows the sanction rates by GAIN Regions and RITE offices and includes all contractors providing case management services. Sanction rates in all regions increased between April 2002 and February 2004. RITE has the lowest rate of sanctions for the entire period of observation. This rate was approximately 5 percent in the beginning of the study period, climbing slowly during the first twelve months, and finally showing a propensity to increase more dramatically beginning in May 2003, reaching 15 percent by February 2004. This is a trend observable in all GAIN Regions and RITE offices where sanction rates increased between 6 and 11 percentage points. The highest rates of sanctions are in GAIN Regions, 3, 4 and 6. The second highest cluster is in GAIN Regions 1, 2, and 5. Region II is served by Affiliated Computer Associates (ACS), a contract agency. MAXIMUS, Inc., Region VII, has the second lowest rate of sanctions for the entire period of observation with the lowest rate of increase in its sanction rate trend.

Figure 3.8

Monthly Sanction Rate by GAIN Regions and RITE Offices
Between April 2002 and February 2004



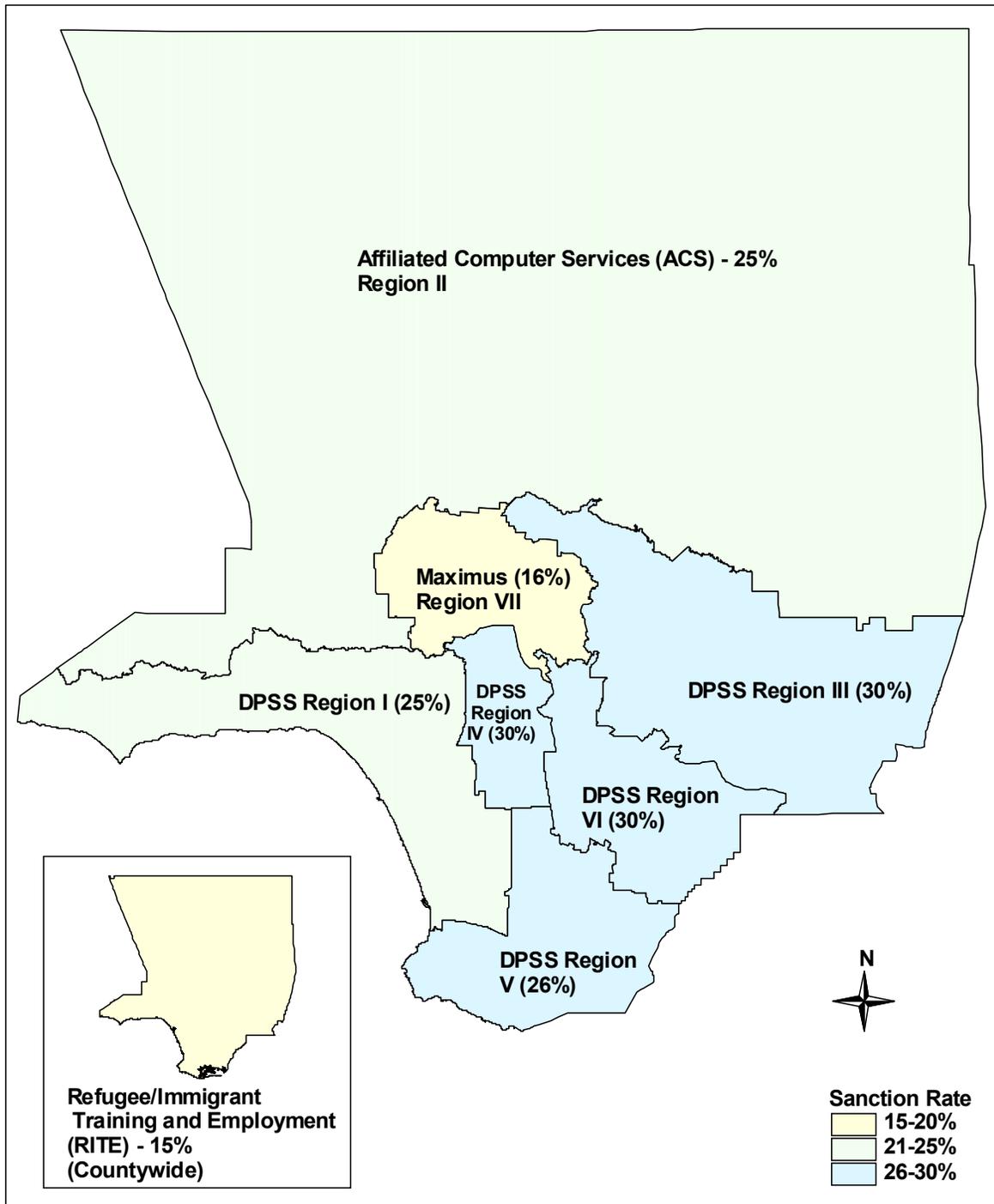
Source: DPSS; GEARS, 2002-2004. Cumulative Sanction File February 2004.

Participants in the RITE offices are significantly different from the participants served in other regions. RITE refers to “Refugee Immigrant Training and Employment” and serves all non-English and non-Spanish speaking GAIN participants throughout the County. It is a widely dispersed network with 12 contract providers at 44 sites. Data indicates that 43 percent of the RITE population is Armenian and another 37 percent of the population is comprised of participants from Cambodia, China, or Vietnam. As noted earlier, the sanction rate for RITE is much lower than the seven geographic regions. One reason for this difference is the late implementation of sanction policies by RITE providers. As the pace of implementation picked up, the sanction rate tripled from 5 percent to 15 percent during the study period.

In addition, almost 80 percent of RITE participants are married, which significantly decreases the likelihood of sanction. Region VII, served by the contract agency MAXIMUS, Inc., also has lower sanction rates relative to other regions. However, the caseload in this region is significantly lower than other regions.⁴ A map of sanction rate in GAIN Regions and RITE offices is illustrated in Figure 3.9. The sanction rates given in the map show the February 2004 values. Since the RITE program is spread all over the County, it is not presented as an area in the map.

Figure 3.9

GAIN Sanction Rates in February 2004 by GAIN Regions and RITE Program



Source: DPSS; GEARS, 2002-2004. Cumulative Sanction File February 2004.

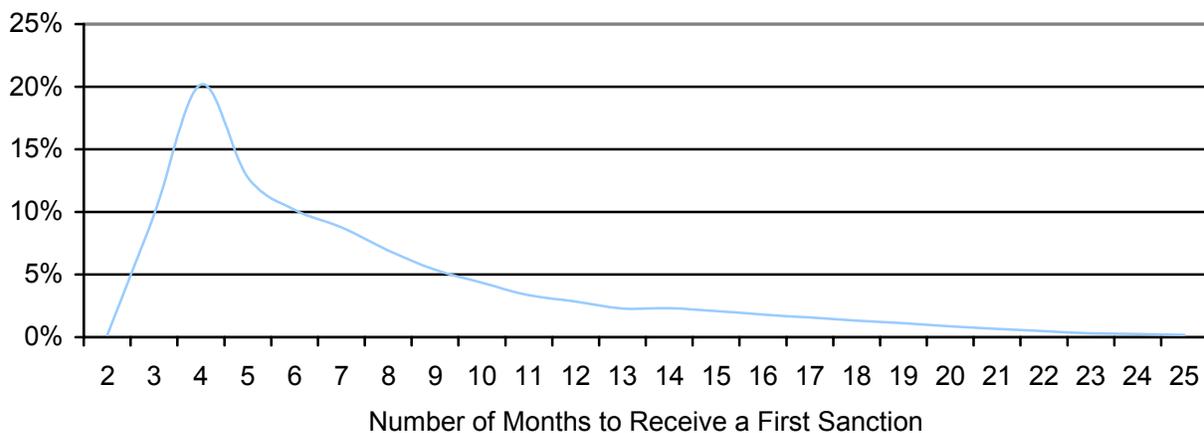
Length of Time to First Sanction and Duration of Sanctions

Figure 3.10 shows the distribution of time to first sanction for the 37,432 participants who registered in GAIN after April 2002. The majority of GAIN participants who were sanctioned during the study period were sanctioned quite quickly following their entry. About 30 percent were sanctioned by the fourth month, and over 50 percent were sanctioned by the sixth month. Almost 85 percent of this population was sanctioned by the end of their first year in GAIN. The median duration to first sanction was six months. A simple analysis of the time to first sanction confirms that participants typically experience their first sanctions quite rapidly after their entry into GAIN. This finding implies that the early months of registration in the program are critical for program intervention.

However, this simple observation of the time to first sanction does not show the critical factors behind these dynamics. Moreover, it does not offer a comparison between the sanctioned population and the participants at risk who were not sanctioned during the same study period. Hence, it is necessary to show which factors contribute to this particular pattern of sanctioning using a predictive model. This analysis is presented in the next chapter.

Figure 3.10

Time Between GAIN Enrollment and the First Sanction Among Participants Enrolled Between April 2002 and February 2004



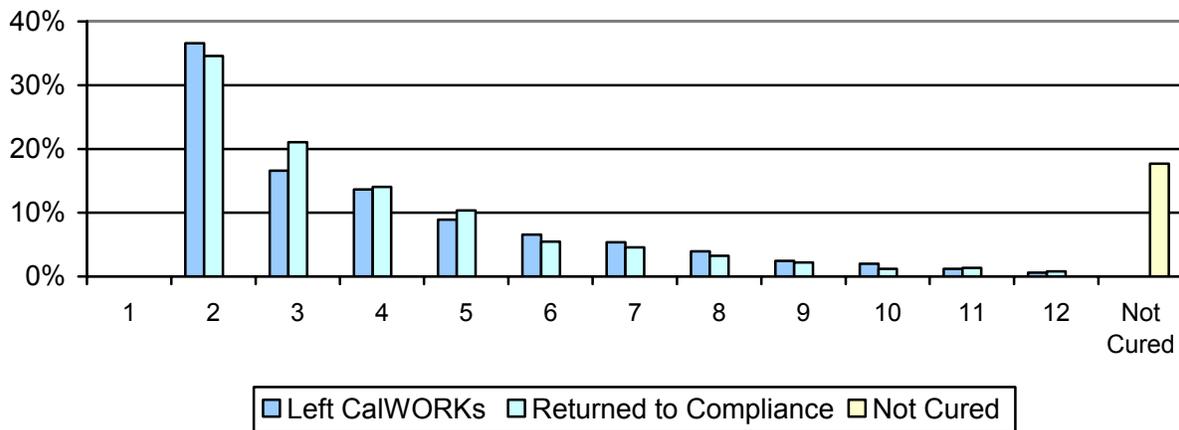
Source: DPSS; GEARS, LEADER 2002-2004. Cumulative Sanction File February 2004.

The data on sanctioned participants was also analyzed to determine the length of time it takes participants to cure their sanctions. The median time to cure their first sanction is only 2 months, which confirms that participants who are sanctioned tend to return to compliance rapidly. Figure 3.10 illustrates the distribution of the time to cure a sanction

for the 5,743 participants who registered in GAIN after April 2002 and sanctioned through September 2003. Figure 3.11 shows that more than one third of the sanctioned participants were cured within two months and over two third were cured after three months. Overall, almost 90 percent of participants were either cured or left the CalWORKs program by the end of the first year of their first sanction. Figure 3.11 also illustrates the time it took to end a sanction (or the number of months the participants remained sanctioned) for those who left the CalWORKs program as well as those who returned to compliance. For those who remained in the CalWORKs program, Figure 3.11 shows that the curing process works to change the status of participants from sanctioned to non-sanctioned. In the next chapter, the likelihood of curing is analyzed by studying the impact of other factors on this process.

Figure 3.11

Number of Months Remained Sanctioned Among GAIN Participants Sanctioned Between September 2002 and February 2003



Source: DPSS; GEARS, LEADER 2002-2004. Cumulative Sanction File February 2004
 Note: The length of sanction among participants that were not cured was 12 months.

Multiple Sanctions

Finally, the data show that there are 1,172 participants who were sanctioned for a second time after returning to compliance following their first sanction. This corresponds to approximately 12 percent of the sanctioned population. The median time between the first cure and the second sanction is 3 months, which is quite short. However, a longitudinal study is required to reach reliable conclusions regarding multiple sanctions.

Conclusion

This chapter has compared the demographic characteristics of sanctioned and non-sanctioned participants, and analyzed patterns in the frequency and duration of sanctions. The demographic characteristics of sanctioned participants are not dramatically different from those of participants who were never sanctioned. The population of sanctioned participants is comprised of more African-American, Latino, single, and English-speaking participants relative to the non-sanctioned population. The contribution of these factors to the likelihood of sanctioning is closely analyzed in Chapter 4. Similar to sanctioned participants, noncompliant participants are younger and have a larger share African-Americans, Latinos, single parents, and an overrepresentation of English-speaking participants.

The majority of the incidents of noncompliance occur when a participant does not complete Orientation. Similarly, the majority of sanctioned participants are sanctioned when they do not show up for their Orientation appointment. These findings show that participants often become noncompliant or are sanctioned before participating in Welfare-to-Work activities. Non-sanctioned participants have higher rates of Job Club completion, greater participation in training, and have higher rates of utilizing supportive than sanctioned participants. The employment and earnings of sanctioned and non-sanctioned participants show a similar pattern.

The monthly sanction rates for all GAIN participants increased from 16 percent to 25 percent between April 2002 and February 2004. A comparison of Los Angeles with other Counties in the state shows that the monthly sanction rate for the County of Los Angeles is not very different from other large counties in the State and presents a similar trend between April 2002 and February 2004.

Cohort analysis shows that approximately 1 out of 4 GAIN participants are sanctioned within 18 months following their registration in the GAIN program. The cohort sanction rate increases sharply during the early part of the cohort study period, and then begins to drop. After one year, the rate increases again when the “at risk” population diminishes significantly because of a high proportion of leavers. The cohort analysis shows that GAIN participants are particularly at risk of being sanctioned during the early months of their registration. The analysis also shows that sanctioned participants tend to be cured very rapidly, and only 1 out of 5 sanctioned participants remained sanctioned while still in the GAIN program.

The analysis of participants who registered in GAIN after April 2002 shows that over half of these participants were sanctioned within 6 months, and over 80 percent were sanctioned within a year. Their average sanction duration was also quite short (less than 3 months). Over 50 percent of sanctioned participants were cured after three months, and over 90 percent were cured in one year. These findings indicate that the initial adjustment to participation in the program is an important factor contributing to the likelihood of being sanctioned. The data also show that approximately 12 percent of sanctioned participants experienced a second sanction spell after returning to

compliance, and these incidents typically took place very rapidly after the participant became noncompliant.

Endnotes

¹ DPSS has been providing administrative data, which covers the GAIN activities of all CalWORKs participants since April 1998. However, the data elements that show the time of a sanction incidence were problematic prior to April 2002. Therefore, since the frequency and duration of sanctions that were imposed before this time are not reliable, this report only presents the sanction rates for the period between April 2002 and February 2004.

² Moreno, M.H., Lichter, M., Burr, B., et al. (2002). *A Window on Welfare Reform: Early Impacts on Families and Communities in Los Angeles County*. County of Los Angeles, Chief Administrative Office, Service Integration Branch, CalWORKs Evaluation Services, July 2002.

³ Figure 3.3 only shows the cumulative percentages of first incidences of being sanctioned or exempt. For example, even if a participant returns to aid after leaving earlier and then re-registers, she/he is still shown as a leaver since her/his first event was leaving aid. As a result, by the end of their eighteenth month period, 32 percent of the cohort participants were still in GAIN, while 55 percent of these participants had left aid. However, in Figure 3.3, by the end of 18-month period, only 15 percent are shown in mandatory status. The difference an effect of those participants who re-register in GAIN after being sanctioned, or who leave aid, or who become exempt earlier.

⁴ The caseload in Region VII is less than half of most of the other regions, comprising only 6 percent of the study population.

CHAPTER IV

Factors Associated With GAIN Sanctions: An Analysis of Administrative Data

Overview

This chapter uses multivariate statistics to examine the impact that background characteristics and program participation have on the probability that GAIN participants will be sanctioned. The data used for this analysis include the administrative records of Welfare-to-Work participants who entered the GAIN program between April 2002 and September 2003. The program history of these participants was tracked through February 2004.

Moreover, the data examined are limited to the 37,433 participants who were mandated to participate in Welfare-to-Work activities when they first entered the GAIN program, which is the same population that was analyzed in the descriptive analysis provided in Chapter 3.

Regression Models

Multivariate regression analyses using logistic regression and multinomial regression were conducted using administrative records¹. The regression approach allowed to estimate the effect of each variable holding constant the effect of other variables in the model. Four regression analyses were conducted.

The first multivariate model was a multiple logistic regression predicting attendance in Orientation. A binary variable with 1 = completed Orientation and 0 = not completed Orientation was used as the outcome variable.

The second multivariate analysis was also a logistic regression model predicting the probability of being sanctioned. The outcome variable for this model was also binary with 1 = sanctioned and 0 = never sanctioned. The second logistic regression was conducted separately for participants that completed Orientation and participants that did not complete Orientation.

The third multivariate model was a multinomial regression analysis predicting return to compliance among the sanctioned participants. Multinomial regression was used for this analysis because the outcome variable had three categories; namely 1= left the GAIN program; 2 = returned to compliance and remained in the GAIN program; and 3 = did not return to compliance and remained in the GAIN program. This regression was conducted only for sanctioned participants that completed Orientation.

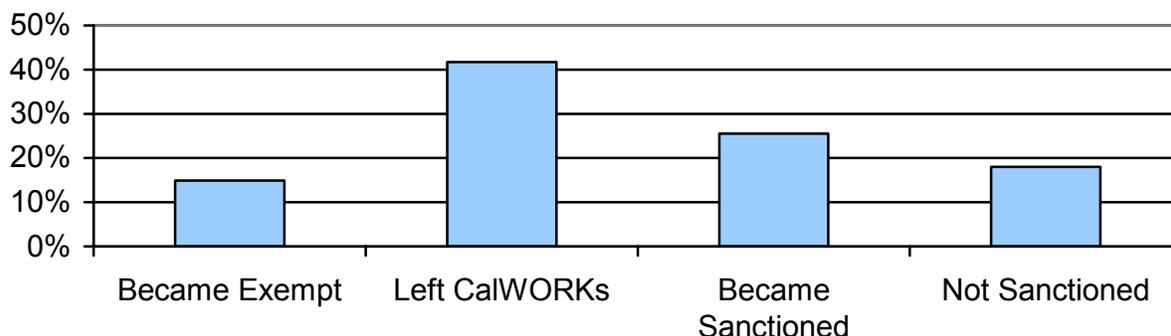
Multinomial regression was used to compare the following three categories in the outcome variable; namely 1 = become noncompliant but return to compliance before being sanctioned; 2 = always remain compliant; and 3 = become sanctioned.

One of the biggest challenges to conducting an analysis of sanction probabilities is the fact that the program status of GAIN participants frequently changes, and these changes often take place within a short period of time. In other words, participants entering the program as mandatory participants might either leave the program after a short period of time or become exempt from participating in Welfare-to-Work activities. The significance of this is that fewer participants are actually at risk of becoming sanctioned over time.

Out of the 37,433 recipients who entered the GAIN program 15 percent (n = 5,582) became exempt during the study period. Another 42 percent (n = 15,596) left CalWORKs without being sanctioned, 25 percent (n = 9,533) were sanctioned and 18 percent (n = 6,722) were never sanctioned during the study period (see Figure 4.1).

Figure 4.1

Change in Program Status of GAIN Participants Between April 2002 and February 2004



Source: DPSS; GEARS, 2002-2004. Cumulative Sanction File February 2004.

Note: Data only includes participants who were mandated to participate in Welfare-to-Work activities in the month they entered the GAIN program.

GAIN Participants Completing Orientation

Noncompliance with GAIN program activities without a good cause puts participants at risk of being sanctioned. One of the first mandated program activities is GAIN Orientation, which is also called Appraisal. Participants who do not show up for Orientation are immediately at risk of being sanctioned. Participants who attend Orientation may still be at risk of being sanctioned if they do not comply with the remaining program components such as Job Club.

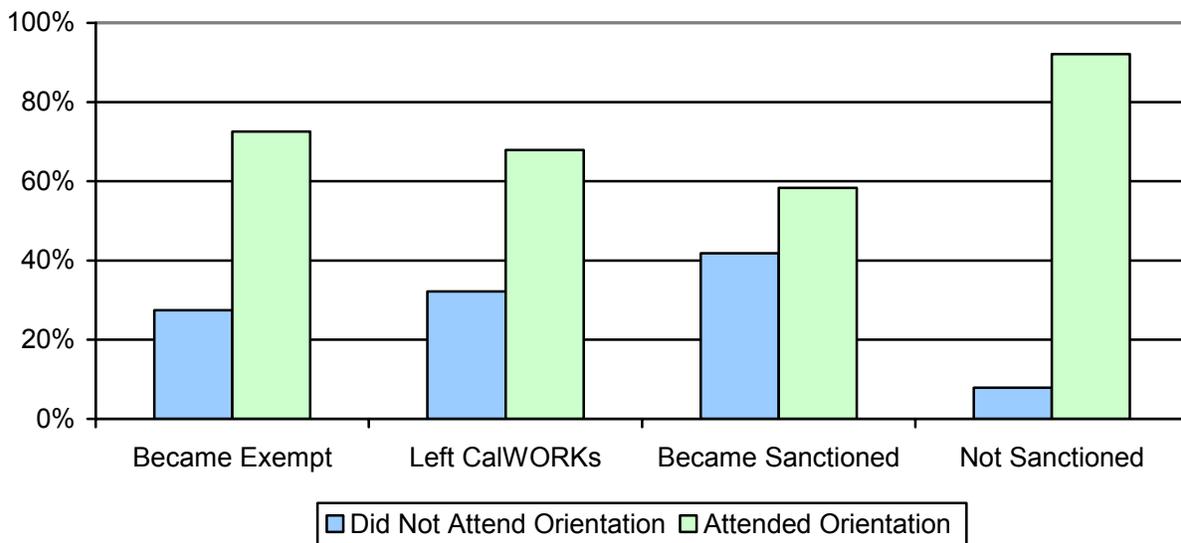
Since all participants in the study population were at risk of being sanctioned in at least their first month after entering the GAIN program, attendance at Orientation was examined among the entire study population. Overall, 70 percent of the participants in the study population completed Orientation during the study period. The remaining 30 percent of the participants would have to complete Orientation if they wanted to utilize program services. It is likely that they would do so if they stayed in the program long enough.

Since the study population includes participants that entered the program during different months during the study period, between April 2002 and September 2003, participants who did not complete Orientation may have been in the program for a shorter period of time. The data supports this argument and shows that participants who had completed Orientation had been in the program for 8.9 months, compared with a program stay of 4.5 months among those who had not completed Orientation as of the end of the study period.

Data in Figure 4.2 shows that participants who were not sanctioned had the highest rate of attending Orientation (92.1 percent), followed by participants who became exempt (72.6 percent). About 67.8 percent of the leavers attended Orientation, and only 58.3 percent of the sanctioned participants attended Orientation.

Figure 4.2

Change in Program Status of GAIN Participants Between April 2002 and February 2004 by Attendance in Orientation



Source: DPSS; GEARS, 2002-2004. Cumulative Sanction File February 2004.

Since all GAIN participants are mailed written appointment letters to attend Orientation, the reasons some participants do not show up for Orientation are unclear and cannot be explored at full length with administrative data. However, this issue is explored in Chapters 5, 6, and 7 through the use of focus groups and survey research.

Predicting the Completion of Orientation

A multiple logistic regression model was used to determine the extent to which participants' demographic, background and program characteristics are associated with the probability of completing Orientation. The variables used as predictors in the model are as follows: Demographic characteristics (**demo** = age, ethnicity, gender); Background characteristics (**back** = primary language, marital status, household size and number of children on aid); program characteristics (**prog** = single parent aid versus two-parent aid (FG and U), GAIN Region and number of months on CalWORKs aid); and employment history (**employ** = not employed in the year before entering the GAIN program).

$$\text{Prob (attend Orientation)} = \text{intercept} + \text{demo} + \text{back} + \text{prog} + \text{employ}^2 + \varepsilon \quad [\text{Eq 4.1}]$$

Table 4.1 shows the variables used in the model that significantly predicted the probability of completing Orientation. Results from the full logistic regression model are included in Appendix B (Tables B1-B6).

Table 4.1

Probability of Completing Orientation, April 2002 - February 2004

Factors Contributing Positively to Completing Orientation (%)

Demographic Characteristics

Women +23.1

Ethnicity (Comparison Group = Whites)

African American + 37.8

Hispanic + 31.0

Asian + 31.5

Background Characteristics

Primary Language

English vs. Other Language + 19.8

Marital Status

Currently Married vs. Single + 30.0

Program Characteristics

Aid Type

Single Parent vs. Two Parent +49.5

Number of Months on AID +19.6

GAIN Region and RITE Offices

(Comparison Group = ACS, Region II)

Region III (DPSS) +19.7

Region IV (DPSS) +10.0

Region VII (MAXIMUS) +30.0

RITE Offices +2.8^a

Factors Contributing Negatively to Completing Orientation (%)

Employment History

Not Employed in the Year Before
Entering GAIN -11.4

Note: GAIN Regions not specified in the above table were not significantly different than GAIN Region II in predicting the probability of completing Orientation. ^a = percentage exceeds 100%. Number reported is the odds ratio.
Source: DPSS; GEARS, LEADER 2002-2004.

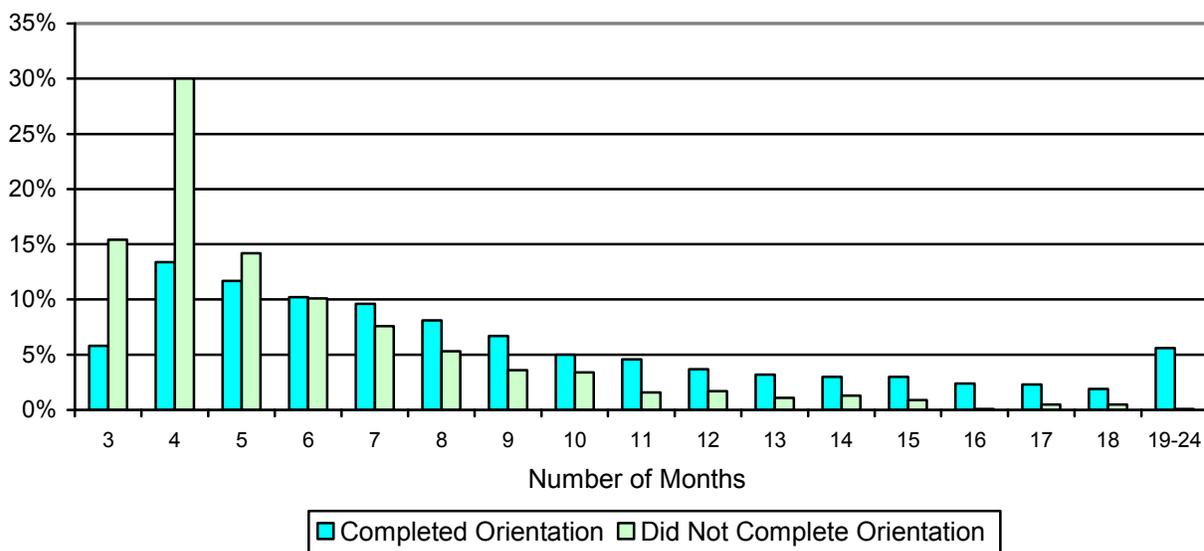
Most of the demographic, background and program characteristics examined in the multivariate analysis were positively associated with completion of Orientation. The only factor that was negatively associated with completing Orientation was employment history in the year before entering the GAIN program. Participants who were unemployed in the year before entering GAIN were significantly less likely to complete Orientation. More than two-thirds of the study population (69.2 percent) was not employed in the year before entering GAIN. These unemployed participants were not necessarily younger in age. In fact, 65 percent of the participants that were unemployed in the year before entering GAIN were 26 years of age or older, while only 35 percent were between 18 and 25 years of age.

How Long Does It Take to Be Sanctioned?

Before examining the probability of being sanctioned, it is useful to examine the amount of time it takes participants to become sanctioned. In connection with this, it is also useful to look at whether the amount of time taken to become sanctioned is associated with completing Orientation. Figure 4.3 shows the length of time it took participants to be sanctioned. Among participants who did not complete Orientation, close to 45 percent were sanctioned within four months, and by six months nearly 70 percent were already sanctioned. On the other hand, only 17 percent of participants who completed Orientation were sanctioned within four months, and only 40 percent were sanctioned by six months. Thus sanctioned participants who completed Orientation took a longer time to be sanctioned than those who did not complete Orientation.

Figure 4.3

**Length of Time It Took Sanctioned Participants to Be Sanctioned
Between April 2002 and February 2004**



Source: DPSS; GEARS, 2002-2004. Cumulative Sanction File February 2004.

Model Predicting the Probability of Being Sanctioned

Participation in Welfare-to-Work activities is mandatory for GAIN participants who are exempted from program activities. Compliance rules and policies are explained to participants during Orientation. Failure to complete Orientation results in the application of sanctions. Therefore, factors associated with being sanctioned would differ among participants who completed and did not complete Orientation. Program activities will have no impact on sanction probability among participants who do not complete Orientation. However, those who complete Orientation could benefit from utilizing services available to them in the GAIN program that help them to comply with program activities. The model predicting the probability of being sanctioned was analyzed separately for participants who completed and did not complete Orientation.

The model did not utilize program variables as predictor variables for participants who did not complete Orientation. Among participants who completed Orientation, program variables, such as utilization of supportive services, were used as predictor variables.

Multiple logistic regression was used to predict the probability of being sanctioned among both those who did not complete Orientation (Equation 4.2) and those who completed Orientation (Equation 4.3). In the logistic regression model using equation 4.2, the predictor variables were the same as in equation 4.1. In the logistic regression model using equation 4.3, the following additional program services (**serv** = child care, transportation) and activities (**act** = completed Job Club, enrolled in SIP, received training after Job Club and Assessment) were used as variables. One additional program variable was also added to the regression among participants who had completed Orientation. This included participants who had utilized any specialized supportive services in the GAIN program. Since participants with a need for specialized supportive services should not be sanctioned, adding this variable to the model was used to shed some light on whether such participants were being screened appropriately and, by extension, if they were less likely to be sanctioned.

Among participants who did not complete Orientation

$$\text{Prob (being sanctioned)} = \text{intercept} + \text{demo} + \text{back} + \text{prog} + \text{employ} + \epsilon \quad [\text{Eq 4.2}]$$

Among participants who completed Orientation

$$\text{Prob (being sanctioned)} = \text{intercept} + \text{demo} + \text{back} + \text{prog} + \text{employ} + \text{serv} + \text{act} + \epsilon \quad [\text{Eq 4.3}]$$

Table 4.2

Estimated Probability of Being Sanctioned Between April 2002 and February 2004

	Completed Orientation	Did Not Complete Orientation
Base Probability of Being Sanctioned (Intercept)	-1.62*	-.80*
Factors That Increased the Probability of Being Sanctioned (%)		
Demographic Characteristics		
Age (Comparison Group = 46 +)		
18-25	+68.0	+46.6
26-35	+39.3	+40.0
36-45	+10.0	+20.0
Ethnicity (Comparison Group = White)		
African American	+10.0	NS
Hispanic	+19.8	+10.0
Asian	+20.4	+30.0
Background Characteristics		
Primary Language		
English vs. Other Language	+33.1	+30.0
Number of Children on Aid	+13.6	+19.6
Program Characteristics		
GAIN Region		
(Comparison Group = ACS, Region II)		
Region IV (DPSS)	+19.8	+13.4 ^T
Region VI (DPSS)	+12.5	NS
Welfare-to-Work Activities		
Not Completing Job Club	+49.0	NA
Factors That Decreased the Probability of Being Sanctioned (%)		
Demographic Characteristics		
Women	-20.2	-40.0
Background Characteristics		
Currently Married Versus Currently Single	-30.0	-30.0
Number of Children Under 1 Year of Age	-28.8	-30.0
Program Characteristics		
Aid Type		
Single Parent versus Two-Parent	NS	-20.7
GAIN Region		
(Comparison Group = ACS, Region II)		
Region III (DPSS)	NS	-18.4
Region V (DPSS)	-18.8	-25.7
Region VII (MAXIMUS, INC.)	-53.5	-50.0
RITE Offices	-81.9	-71.4
Employment History		
Not Employed in the Year Before Entering GAIN	-9.6	-11.2
Welfare-to-Work Activities		
Completed Job Club	-27.6	NA
Enrolled in SIP	-41.4	NA
Received training after Job Club and Assessment	-67.6	NA
Supportive Services		
Utilized Childcare	-40.5	NA
Utilized Transportation	-40.3	NA
Specialized Services	-59.5	NA

NA = Not applicable and variable not entered in the model. NS = not statistically significant.
 Source: DPSS; GEARS, LEADER 2002-2004. Cumulative Sanction File February 2004.

Younger Participants, Hispanics and Asians Were More Likely to Be Sanctioned With or Without Completing Orientation

Participants younger than 46 years of age were more likely to be sanctioned regardless of whether or not they completed Orientation, although among 18 to 25 year old participants, this probability was slightly higher for those who completed Orientation (70 percent) than those who did not complete Orientation (46.6 percent).

African-Americans who completed Orientation were more likely to be sanctioned compared with Whites. However, among those who did not complete Orientation, there was no significant difference between African-Americans and Whites in terms of their probability of being sanctioned. Hispanics and Asians were more likely to be sanctioned in both the groups. Similarly, English-speaking participants and households with more children on aid had a greater probability of being sanctioned.

Women, Married Participants and Households With Younger Children Had a Lower Probability of Being Sanctioned With or Without Completing Orientation

Some background factors were also associated with a lower probability of being sanctioned. Women, currently married participants, and households with children under one year of age, all had a significantly lower probability of being sanctioned among both the group that completed and the group that did not complete Orientation.

Among participants that completed Orientation, aid type (i.e., single parent [FG] versus two-parent [U]) was not associated with being sanctioned. Among participants that did not complete Orientation, the adult in a single parent household (program type = FG) was significantly less likely to be sanctioned compared with an adult in a two-parent household (program type = U).

Mixed Differences Between GAIN Regions and RITE Offices

While participants in GAIN Regions 4 and 6 had a greater probability of being sanctioned compared with participants in the GAIN Region served by ACS, participants in other GAIN Regions—namely region five (served by DPSS), region seven (served by MAXIMUS, Inc.), and participants served by RITE offices—had a lower probability of being sanctioned. Regardless of completing or not completing Orientation, participants in the RITE offices had the highest probability of not being sanctioned (between 71 to 81 percent) compared with participants in the GAIN Region served by ACS.

Participants who were unemployed in the year before entering GAIN were less likely to be sanctioned. These participants were also less likely to complete Orientation. Therefore, it was interesting to examine the program outcomes of these participants. Data for these participants revealed that 41 percent left the CalWORKs program without being sanctioned, 24 percent became sanctioned, and 19 percent were not sanctioned. The remaining 16 percent became exempt after entering the program.

Utilization of Non-Specialized Supportive Services Prevented Participants from Being Sanctioned

Among participants who completed Orientation, the utilization of non-specialized supportive services, such as child care services or transportation, reduced the probability of being sanctioned by 40 percent. This indicates that barriers to compliance may be associated with an unmet need for supportive services. When this need is met, it appears that participants are more equipped to remain compliant with Welfare-to-Work requirements. For example, 86 percent of the participants that completed Job Club utilized transportation services, and only 14 percent who completed Job Club did not utilize transportation services.

Program Involvement Through Participation in Welfare-to-Work Activities Helped Participants Avoid Sanctions

Sanctions policies are designed to encourage participants to comply with program requirements. It can be expected that those who participate in these program activities will be less likely to be sanctioned. The current analyses substantiated this hypothesis and confirmed that participants who completed Job Club, or enrolled in SIP, as well as those who received training after Job Club and Assessment, were significantly less likely to be sanctioned. The risk of being sanctioned diminished by 67.6 percent for those who received training after Job Club compared to those who only completed Job Club.

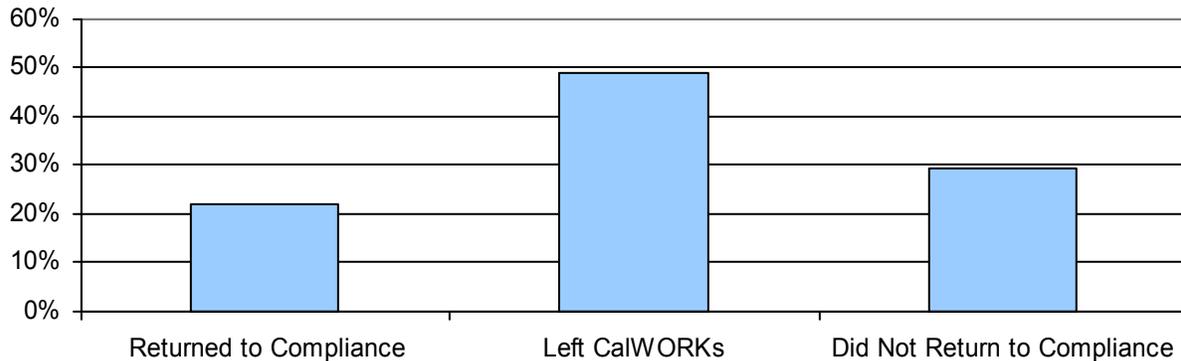
The Return to Compliance After Being Sanctioned

Nearly Half the Sanctioned Participants Left the GAIN Program

Among the sanctioned participants, 21.9 percent (n = 2,090) returned to compliance, another 48.9 percent (n = 4,658) left the CalWORKs program, and 29.2 percent (n = 2,785) remained sanctioned (see Figure 4.4).

Figure 4.4

**Percent Sanctioned Participants Returning to Compliance
Between April 2002 and February 2004**



Source: DPSS; GEARS, 2002-2004. Cumulative Sanction File February 2004.

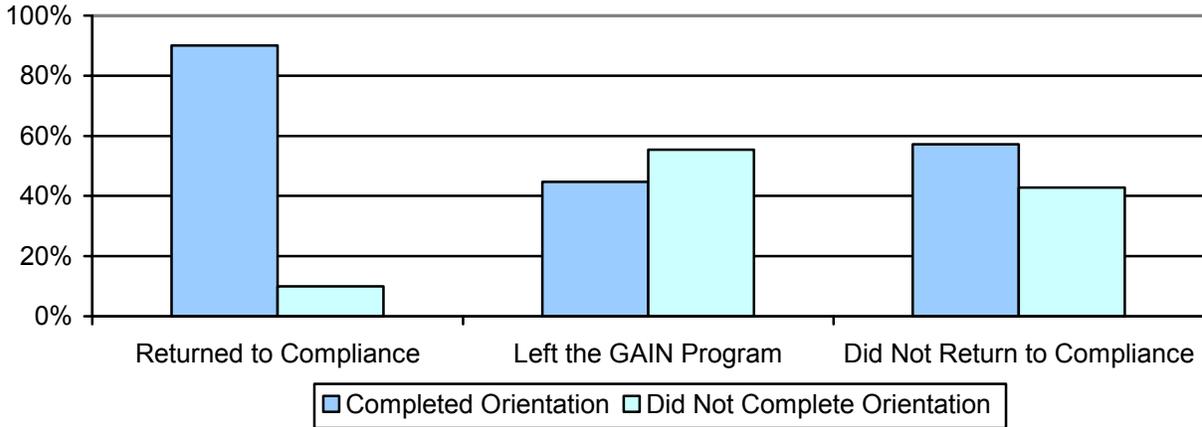
From the administrative data, it is not possible to determine why the participants left the program. Administrative data for participants who leave the program offers little understanding about their transition through the GAIN program and the impact of program activities on their program outcomes. Therefore, another way to look at this data is to exclude the participants who left the CalWORKs program. In doing so, the data shows that among the participants who stayed in the program (2,090 + 2,785), 43 percent returned to compliance and 57 percent did not return to compliance.

A Majority of the Participants Who Returned to Compliance Had Completed Orientation

Completing Orientation appears to be a significant factor in the return to compliance. Figure 4.5 shows that about 90 percent of the participants who returned to compliance and did not leave the program had completed Orientation, compared with only 45 percent of the leavers. Among participants who did not return to compliance, 57.2 percent had completed Orientation and 42.8 percent had not completed Orientation.

Figure 4.5

**Percent Sanctioned Participants Returning to Compliance
Between April 2002 and February 2004 by Orientation Status**



Source: DPSS; GEARS, 2002-2004. Cumulative Sanction File February 2004.

Since a substantial proportion of the sanctioned participants left the CalWORKs program, it was useful to examine the impact of background, demographic, and program factors on their probability of leaving the program as an outcome variable, along with their probability of returning or not returning to compliance. To examine this polynomial outcome a multinomial regression analyses was conducted.

The following three comparisons in the outcome variable were made: 1 = leaving the CalWORKs program versus staying sanctioned; 2 = returning to compliance versus staying sanctioned; and 3 = leave the CalWORKs program versus returning to compliance. Detailed tables on all the regression analysis are provided in Appendix B.

Table 4.3 shows the results of the multinomial regression analysis and the significant predictors associated with returning to compliance. Since it is not possible to return to compliance unless the participants complete their program Orientation, the following analysis was conducted only among the participants that completed Orientation. The predictor variables used in the analysis were similar to the previous model which included program and background variables. The following equation was specified for the multinomial regression analysis to examine the return to compliance:

$$\text{Prob (of leaving the program } [p_1] \text{ vs. returning to compliance } [p_2] \text{ vs. not returning to compliance } [p_3]) \\ = \text{intercept} + \text{demo} + \text{back} + \text{prog} + \text{employ} + \text{serv} + \text{act} + \varepsilon \quad [\text{Eq 4.4}]$$

Table 4.3

Probability of Leaving the CalWORKs Program or Returning to Compliance Versus Staying Sanctioned Between April 2002 and February 2004

	Leaving CalWORKs (p_1) vs. Staying Sanctioned (p_3)	Returning to Compliance (p_2) vs. Staying Sanctioned (p_3)
Base Probability (intercept)	1.31	NS
Factors Positively or Negatively Associated With Leaving GAIN or Returning to Compliance Compared With Not Returning to Compliance (%)		
Background Characteristics		
Primary Language English vs. Other Language	+52.1	+43.8
Number of children under one year of age in the household	-17.1	-20.6
Program Characteristics		
Aid Type Single Parent versus Two-Parent	-19.0	NS
Number of Months in the GAIN Program	-7.62	+12.6
Employment History		
Not employed in the year before entering GAIN	-19.5	-15.9
GAIN Region (Comparison Group = ACS, Region II)		
Region IV (DPSS)	-23.1	-21.2
RITE Offices	-65.7	-83.9
Welfare-to-Work Activities		
Completed Job Club	+34.2	+88.2
Received training after Job Club and Assessment	NS	-70.3
Supportive Services		
Utilized Childcare	-23.5	-25.4
Utilized Transportation	-32.4	-70.3

NS = not statistically significant.
Source: DPSS; GEARS, LEADER 2002-2004. Cumulative Sanction File February 2004.

Compared with the previous regression models predicting the likelihood of completing Orientation or being sanctioned, fewer variables were associated with return to compliance.

Sanctioned participants were more likely to leave the GAIN program than return to compliance. English speaking participants had a greater probability of leaving the GAIN program or returning to compliance rather staying noncompliant.

Participants with Younger Children, Single Parents, and Those Utilizing Non-Specialized Supportive Services Were Likely to Remain Sanctioned

Participants with younger children in the household (i.e., under one year of age) were less likely return to compliance and more likely to remain sanctioned. In addition, participants who utilized childcare services were also more likely to remain sanctioned. This is interesting, because in the previous model, utilization of non-specialized supportive services helped participants from being sanctioned. But among sanctioned participants, those who were using the non-specialized supportive services were associated with staying sanctioned.

Thus, while non-specialized supportive services may be helping participants stay compliant, but the use of these services by participants may also indicate their need for it. This need could then become a barrier for not being able to return to compliance. Since single parents are also more likely to remain sanctioned and they have the greatest need for child care, the role of non-specialized supportive services in meeting the needs of participants needs to be examined further in more detail.

Sanctioned Participants Who Entered the Program as Unemployed Were Neither Likely to Return to Compliance or Leave the CalWORKs Program and More Likely to Remain Sanctioned

Another barrier associated with the return to compliance was employment history in the year before entering GAIN program. Participants who were unemployed in the year before entering the program were significantly less likely to leave or return to compliance. Rather, they were more likely to stay sanctioned.

Unemployed participants in the previous models were significantly less likely to complete Orientation. They were also significantly less likely to be sanctioned. This could be because they either left the program or had significant barriers to compliance which allowed them to be exempt, thereby lowering their risk of being sanctioned. The model for compliance (equation 4.4) showed that when these participants became sanctioned, they were less likely to return to compliance, suggesting a need to further explore their barriers to compliance through surveys.

Participants Entering Noncompliance but Returning to Compliance Before Being Sanctioned

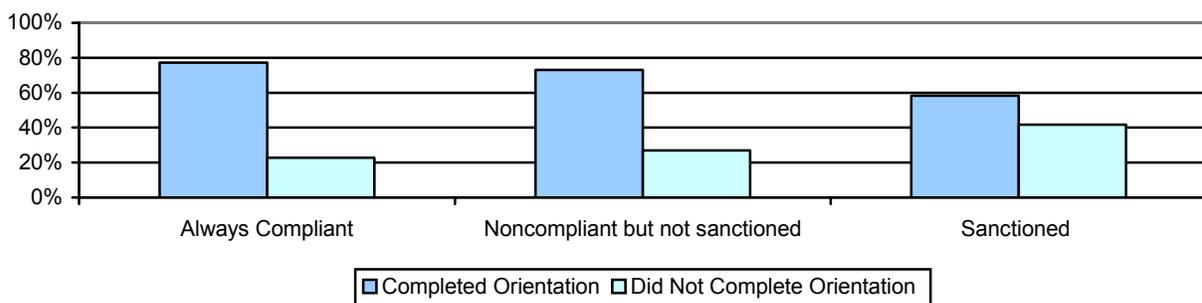
The previous models (Equations 4.2 and 4.3) analyzed the impact of background and program factors on being sanctioned by comparing them with participants who had never been sanctioned. The never-sanctioned participants, on the other hand, were also a distinct population and consisted of two sub-groups: 1) participants who entered noncompliance but returned to compliance within the grace period of 21 days and were thus not sanctioned; or 2) participants who never even entered noncompliance and were always compliant.

In the previous regression models, these two groups were combined and consisted of one group, i.e., the never-sanctioned group. Among the 27,900 never-sanctioned participants, 62.7 percent (n = 17,485) became noncompliant but returned to compliance before being sanctioned, and the remaining 37.3 percent were always compliant in the program. It is quite likely that the background and program factors were differentially associated with the noncompliant and compliant populations, in addition to the differences among the sanctioned participants.

As mentioned earlier, a majority of the study population completed Orientation. As expected, a break down of Orientation status by the three groups revealed that the highest proportion of the always compliant participants had completed Orientation (77.2 percent), followed by noncompliant participants (73.1 percent) [Figure 4.6]. These data therefore reveal differences not only among sanctioned and never sanctioned participants, but also between compliant and noncompliant participants.

Figure 4.6

Proportion of Compliant and Noncompliant Participants Completing Orientation Between April 2002 and February 2004



Source: DPSS; GEARS, 2002-2004. Cumulative Sanction File February 2004.

In order to understand differences between these three groups, a multinomial regression analysis was conducted to examine the impact of background and program variables on the three-category outcome variable, where 1 = entered noncompliance but did not get sanctioned; 2 = always remained compliant; and 3 = became sanctioned.

Table 4.4

Probability of Being Noncompliant but Not Being Sanctioned or Always Remaining Compliant Compared With Being Sanctioned Between April 2002 and February 2004

	Being noncompliant (p_1) vs. Being Sanctioned (p_3)	Being always Compliant (p_2) vs.
Base Probability (intercept)	.76	1.54
Demographic Characteristics		
Age (Comparison group = 46 +)		
18-25	-36.9	-46.8
26-35	-20.2	-45.3
36-45	NS	-19.2
Ethnicity (Comparison group = Whites)		
African American	NS	-27.8
Hispanic	-14.8	-19.3
Asian	-16.1	-19.3
Women	+19.2	+42.4
Background Characteristics		
Primary Language		
English vs. Other Language	NS	-52.9
Number of children under one year of age in the household	+31.5	+65.9
Number of children on aid	-11.4	-11.0
Married vs. Single	+36.1	+64.2
Program Characteristics		
Number of Months in the GAIN Program	-2.01	-10.7
Employment History		
Not employed in the year before entering GAIN	NS	+31.0
GAIN Region (Comparison Group = ACS, Region II)		
Region I (DPSS)	+19.9	NS
Region III (DPSS)	+19.2	-20.5
Region IV (DPSS)	NS	-47.1
Region V (DPSS)	+30.1	NS
Region VI (DPSS)	NS	-32.7
Region VII (MAXIMUS)	NS	+4.8 ^a
RITE Offices	-34.8	+13.9 ^b

^{a, (b)} number reported is the odds ratio because the probability exceeds 100%. Participants in Region VII and (RITE offices) were 4.8times and (13.9 times) more likely to stay compliant than be sanctioned compared with participants in Region II.
Source: DPSS; GEARS, LEADER 2002-2004. Cumulative Sanction File February 2004.

The purpose of the fourth and final regression model was to examine differences in the probability of being noncompliant or always being compliant compared with being sanctioned. The results indicated that the factors associated with being sanctioned were the same factors associated with being noncompliant but not sanctioned.

For example, the earlier model showed that younger participants were more likely to be sanctioned. This model showed that younger participants were also more likely to be either noncompliant or sanctioned than they were to remain compliant. Similarly, the earlier model showed that women were less likely to be sanctioned. This model showed that women were more likely to remain always compliant than they were to be sanctioned or enter noncompliance. Since the majority of the participants in the program are women, it is possible that they are able to form networks and share information with other members in the program to a greater extent than men. It is also possible that men may enter the program with more barriers.

Conclusion

A multivariate analysis of sanctions with administrative data has limitations. While this type of data is able to provide aggregate counts of sanction and compliance rates, it does not allow for an in-depth exploration of the reasons behind sanctions. The association of background factors with sanction probabilities does not tell us why some groups with certain background characteristics are more likely to comply than others. These issues are better understood by examining longitudinal data where program activities of a group of participants are tracked over time in order to see the extent to which noncompliance is associated with understanding of program requirements.

The multivariate analyses offered in this chapter were able to reveal some significant predictors associated with the probability of being sanctioned. The most important issue associated with being sanctioned or entering noncompliance was the completion of Orientation. Completion of Orientation was also associated with the amount of time participants were in the program. Participants who had completed Orientation tended to be in the program longer than those who had not.

Delaying the completion of Orientation is likely to add further financial hardship to participants since they are at risk of being sanctioned. In addition, since they cannot use any program services such as training or Job Club until they attend Orientation, they are either likely to stay longer in the program without benefiting from it or leave the program without using any services.

Identifying the reasons why participants do not complete Orientation is difficult because administrative data shows that nearly half of the participants left the program relatively quickly after their entry. The extent to which this is associated with completing Orientation is not quite clear. In addition, the success rate of programs can be under or overestimated depending on the inclusion or exclusion of leavers from the analysis. In this study, GAIN participants who left the CalWORKs program were analyzed as a

separate group. In addition, separate analyses were conducted for participants who completed and did not complete Orientation.

Overall, background and demographic factors were associated with the likelihood of completing Orientation and complying with program requirements. Women, members of various ethnic groups, English-speaking and married participants were all likely to complete Orientation. The only factor associated with not completing Orientation was unemployment in the year before entering the GAIN program.

About 45 percent of sanctioned participants that did not complete Orientation were sanctioned within four months. By the sixth six month, close to 70 percent of these participants were sanctioned. Clearly, for this group, their sanction was associated with not completing Orientation. Among sanctioned participants that did complete Orientation, the reasons for being sanctioned were associated with noncompliance with program activities. These participants took a longer time to be sanctioned. Among participants who completed Orientation, only about 17 percent were sanctioned within four months, and by six months only 40 percent were sanctioned.

Some demographic predictors were differently associated with completing Orientation and being sanctioned. For example, while there were no age differences associated with completing Orientation, younger participants were more likely to be sanctioned. Younger participants also have younger children. Although participants with younger children were less likely to be sanctioned, however once sanctioned, they were more likely to stay sanctioned.

The use of non-specialized supportive services was also associated with a lower probability of being sanctioned. However, among sanctioned participants, the use of such services was also associated with lower probability of returning to compliance, indicating that participants who used these services may also have significant barriers to compliance. Further research needs to be done to examine whether the use of non-specialized supportive services is helping participants overcome barriers to compliance.

Another significant predictor of compliance and noncompliance was the participants' employment experience in the year before entering the GAIN program. Unemployed participants' had a lower probability of completing Orientation, placing them at a greater risk of being sanctioned. However, unemployed participants were also less likely to be sanctioned, but once sanctioned, were more likely to stay sanctioned compared with participants who were employed in the year before entering the GAIN program. This suggests a need to understand and differentiate between their barriers to attending Orientation, and barriers to complying with program requirements after completing Orientation.

Sanction probabilities also differed across GAIN Regions and RITE offices. Participants in the GAIN Region served by MAXIMUS, Inc. and RITE offices were significantly less likely to be sanctioned compared with participants in GAIN Region II (ACS). However, sanctioned participants in the RITE offices were also significantly less

likely to return to compliance and more likely to stay noncompliant. This suggests that some participants may either not know that they are noncompliant or may willingly choose to stay noncompliant in order to receive other program benefits like Medi-Cal. Such factors associated with the return to compliance cannot be explored with administrative data and need to be examined further through a survey of sanctioned participants.

Endnotes

¹ For further reading on logistic and multinomial regression, see the following: Allison, P. D. (1999). *Logistic Regression Using the SAS System : Theory and Application*, Cary, NC: SAS Institute Inc: Long, J. S. (1997). *Regression Models for Categorical and Limited Dependent Variables*. Sage Publication, Thousand Oaks.

² See Technical Appendix B for detailed tables on all the regression models.

CHAPTER V

In Their Own Words: Participants Talk About Noncompliance and Sanctions

As part of the effort to understand compliance and sanctions issues from the viewpoints of GAIN participants in the County of Los Angeles, researchers conducted four focus groups whose members were recruited randomly from a purposeful sample of noncompliant, sanctioned, and previously sanctioned and now compliant GAIN program participants. In total, 26 parents participated in the groups. Consistent with the objective of the research to acquire insight into significant sanctions patterns, quantitative findings from County records were used to establish the following criteria for selecting focus group participants: 1) GAIN Regions that had comparatively high rates of sanctions (two were selected); 2) within these offices, Spanish and English speaking participants; and 3) participants with varied sanctions histories (See APPENDIX B for a detailed description of sampling criteria and APPENDIX C for information on the conduct of focus groups).

How to Interpret Focus Group Methods and Findings

Focus groups are moderated, in-depth discussions of a predetermined topic that involve a small group of people who have something in common, as indicated in the sample selection criteria described above. The focus group discussions centered on participants' experiences with the sanctions process and whether or not sanctions, or the threat of sanctions, motivated them to comply with GAIN requirements. Participants were asked to talk about what led to their noncompliance, their knowledge of the sanctions process, what factors helped or hindered their ability to return to compliance, and the impact of sanctions on themselves and their families. In reading the following document, it should be noted that participants are literally speaking in their own words, and that everyday, unrehearsed speech is very different from a carefully crafted, grammatically correct written text. The goal of focus groups is to capture the spontaneity and unedited insight of an informal discussion. This means that given the open, nonjudgmental atmosphere required to elicit information and the assurance of privacy protected by state and federal laws, participants sometimes make dramatic and critical remarks. In accordance with best practices and accepted conventions for reporting focus group results, participants' words are quoted verbatim with minimal editing and indented in the text.

This chapter deals specifically with GAIN participants' experiences of noncompliance and sanctions: how noncompliance, sanctions, and returning to compliance were influenced by their life situations and the program's administrative practices, and whether or not sanctions encouraged participation in the GAIN program. To interpret the findings correctly, it is important to understand the advantages and limitations of the qualitative methods of focus groups and how they provide information that differs from, but nonetheless complements, the information provided by the quantitative methods

used elsewhere in this report. As for connections and convergences between methods, as noted above, the focus group sample and selection of participants were based on quantitative findings from administrative data identifying regions and populations with relatively high sanctions. Focus group findings can also complement and enhance quantitative findings by revealing what statistics cannot—in this case, an in-depth “person level” exploration of perceptions and experiences with sanctions and a concrete sense of how things really happen in participants’ lives. In addition to helping with the interpretation of quantitative findings, focus groups also hold the possibility of discovering new information that may not have been previously known or included in quantitative surveys. In terms of the participant survey (to appear in the second sanction report), focus group findings based on the concerns and language of participants were used in developing and phrasing survey questions.

However, in interpreting focus group findings, readers need to understand that they have important limitations. While focus groups put a human face on quantitative data, their members may not be representative of GAIN participants as a whole. Focus groups provide neither generalization nor verification of findings. By contrast, surveys using random samples and standardized questions have the advantage of producing statistical data that identify patterns that are broadly representative of, and generalized to, the larger participant population, and some verification of quantitative findings is possible. However, the objective of focus group research is not to verify what participants say, but rather, to tap experiences and perceptions that may affect their compliance and involvement in the GAIN program; that is, neither verification nor generalization are primary research goals of focus group research. Nonetheless, a degree of generalization can be achieved when focus group and survey findings converge and agree. This issue will be discussed further in the conclusion of the report and in the discussion of the GSW focus groups.

How the Life Situations of Participants Influenced Their Decisions Not to Comply

In the focus groups, GAIN caseworkers framed their understanding of compliance and sanction issues in terms of their work situations—the need to manage caseloads, provide information to participants, monitor their compliance, and use warnings of noncompliance and sanctions as tools to encourage involvement in the program. In contrast, participants framed their understanding of compliance and sanctions in terms of their poverty situations and most urgent priorities—getting enough money from work, welfare, or somewhere else to pay the rent and utilities, and taking care of health, food, and the many needs of their children. The urgency varied with family needs and the unstable and changing flow of income and expenses.

When Income Needs Take Priority Over Compliance

Participants’ efforts to provide for their families involve piecing together different sources of income and services from a host of Federal, State, and local agencies. In this context, getting sanctioned and losing the adult portion of their aid is only one factor, and not necessarily the dominant one, in an ongoing quest for income and providing for

their family's needs. The following cases illustrate how decisions about participating in GAIN that may lead to sanctions are influenced by participants' life situations and most immediate priorities.

In the first case, Karl decides against compliance because he thinks that getting involved in GAIN activities actually takes away from his ability to bring in money. Since 2000, Karl has been in and out of compliance and sanctions—not appearing for Orientation, Appraisal, and assignment to a GAIN activity. According to his account, the first time, he did not attend because he had moved and did not get the letter notifying him that he needed to report to GAIN; and the second time, it was because he lacked child care. At the time of the focus group, he had been sanctioned for four months and told us that in order to make ends meet, he needs to work to supplement his income. He believes the time required to participate in GAIN activities and to fulfill the 32 hour per week work requirement would interfere with opportunities for episodic, but relatively well-paying, jobs he could get in the music industry. He described the last occasion on which he failed to appear for Orientation.

On this particular date, they wanted me there at 8:00 in the morning till all day. I had to go to work this day to get my money. What do I do? If I didn't comply, I was going to be sanctioned.

What is going to benefit you the most? Even if I had maybe four [music] sessions a month, that would still help me out, even though I'm sanctioned. I'm working, I can put that together. I can make it.

Realizing that he would be sanctioned for nonparticipation, Karl made the decision to miss Orientation in the context of his immediate survival needs and his current options for meeting them. His conclusion is that given his particular skills, he would be better off getting sanctioned and losing part of his aid. Moreover, he thinks that other recipients would probably share his reasoning.

Most cases the recipient...they have to take care of the household, so right off the top, you have to do something else...Let's just say they want you to participate in the GAIN program...but you need to do what you are going to do to take care of your bills.

This was certainly the case for Luis. When he could not find work, he complied with GAIN regulations. When he found work and sufficient income to get by, he did not bother to comply and got sanctioned. Luis has been in GAIN for about a year and remained sanctioned most of the time. Now, with little work and income, he is considering returning to the program but fears that he will be recycled into Job Club, not get training to raise his skills and income, and be pushed back into low-wage work.

I don't like Job Club. All they do is teach you how to build up a resume. I need to work. I can't be there for a month. That's a whole month I'm just losing. If they want to teach me how to do something, alright. But they play with the computer, doing resumes. I know how to do all of that already. It's just a whole month, waste of time for me. I just prefer looking for a job.

When a Mother Can't Find Safe Child Care

While Karl and Luis decided not to comply with GAIN's work requirements, Nora wanted very much to participate in the program but refused, at least temporarily, because of an incident with unsafe child care. She and her husband are Guatemalan immigrants with two girls, ages one and two. Norma was a kindergarten teacher in her own country and hopes for a similar job here. In the United States, she is learning English and has worked at several low-wage jobs. When her youngest baby reached the age of one, she followed the GAIN work requirement and got child care assistance. However, her experience with child care was so upsetting that she will not trust anyone but herself to take care of her girls until they get older.

I found out that the lady who cared for my children was giving them Tylenol. They were always asleep. I got sick, stressed out, traumatized, and stayed home to care for my children...I was sanctioned. My husband and I are sacrificing maximum for them. It's a struggle.

Norma hopes to work in the future when her children are older, if she can find safe child care. She needs work in order to survive and will comply with GAIN requirements, but her first priority is her children.

When Participants Believe That Medical and Mental Health Needs Are Not Met

Medical problems were common among focus group participants and one of the most significant barriers to nonparticipation and sanctions. Shantee was diagnosed with breast cancer in 2000 just before she was to attend Job Club. She was sanctioned for not attending and explains why she has not come into compliance with the GAIN program since her operation.

I found out that I had tumors in my breast so I had to go through the surgery, and I went through this whole ordeal because once they went in to do the surgery, they found more. So it was just really a medical issue. I did report it to GAIN that I could not participate because after the surgery, I was going through the healing process. I lost my hair. I just went through a lot of stuff, and they sanctioned me.

When researchers asked if she had sought a "good cause" exemption for medical reasons, she explained that her situation made going through the process overwhelming in the context of an already difficult life.

So even in my case with the sanction... They sent off the letter, I did call them, and I let them know that I was going through this ordeal. So then she told me...to bring it in..., but at this time, I'm going through an ordeal here. Don't know whether or not I have cancer. I'm trying to keep my household together, my family. We were going through this thing together, and it's like that didn't matter. They just cut me anyway.

So then the letter came afterwards when they cut it to tell me, "You've been cut. If you can show reason or whatever as to why, let us help to get you back on."
...At that point, I was so disappointed and devastated. ...it didn't matter. ...why go through the whole drama, because it almost seems like you can't win.

Shantee believed that her caseworker was insensitive to her medical trauma and prefers to go without her cash aid, although she is a single mother and needs it.

Javier's case is somewhat similar, except that he suffered from mental health problems, and he actively tried to comply and cure his sanction. Once a well paid house painter who made \$1,000 per week before taxes, he applied for aid for himself and his family when he lost his job. The stress of losing his job, mounting expenses, and a tumultuous breakup with his wife caused deep depression. He got some pills from his doctor who said he was not ready to attend GAIN and wrote a letter to that effect. In spite of the advice, Javier tried to attend Job Club but missed appointments because of panic attacks and disorientation. After receiving many letters he did not understand, GAIN lost his medical proof of "good cause." He had difficulty communicating with his caseworker who he felt "did nothing" but treat him as a "standard fraud case," and he dropped out of the program. This is how he sums up his negative experience and the reason for dropping out.

I thought it was only me depressed, I felt I was not important. They think I'm one of those lazy people, that I want freebies...I have no doubt GAIN works, but, in my case, since I got sick, I really needed help...I had no choice, could not defend myself, I would get mail, scared to open it, it was bad, like panic. They did not pay attention. I told every single person that I was sick; the fact is that no one paid attention to me. The worker just agreed with me. I don't know if he could help me. The fact is he didn't.

According to Javier, attempts to comply with GAIN increased his depression and lowered his sense of pride and self-esteem. He wanted help for his mental condition and, in his opinion, did not get it. Exactly why he did not get the help cannot be determined based on what he said. But, whatever the reasons, he now wants to have nothing to do with GAIN. Fortunately, he is feeling better and may also have a reason for not needing his aid. A skilled house and car painter, he is selling his house and hopes to go into business with his 20 year-old son. Meanwhile, his younger children continue to receive financial and medical aid.

Like Javier, Cindy was totally stressed-out and suffering from depression but wanted to attend GAIN and find work. She did not seem to realize that she was sanctioned for not attending Orientation and did not even know that she had a GAIN worker. Now besides losing her own cash aid, she and her children faced eviction from a hotel room paid for by one-time emergency homeless assistance. She described her brief encounter with GAIN:

I was scheduled for one appointment months ago here, this office, and I couldn't come because I was stressed. It was depression. I was taking all these

medications, and I couldn't come... She (her doctor) gave me a note saying I couldn't come to the appointment, and from there, I didn't hear anything.

Cindy's plight was clear to Martha, a welfare veteran who knows how the system works and how to take advantage of what it has to offer. Having benefited from GAIN's Specialized Supportive Services for domestic violence and mental health problems, she told her own story and offered advice to Cindy:

The minute you are sanctioned, you are stressed out already. That alone is a good cause to call your GAIN worker and tell them, "I'm sanctioned and my money, I have problems, I can't deal with this." Right then and there they are supposed to help you. A lot of people don't know that. It has taken me a lot of years. I have been on since '92. But it's taken me quite a few years in order to know the good causes. It's sad that I've been on it this long, and I haven't been able to get off of it, but throughout my lifetime as well as later when I'm totally cut off, I mean, I know I am going to have problems, but it's just a matter of right now I'm trying to help deal with them. That's where I'm at right now.

There is some kind of...like the one time help fee of putting you up in an apartment. There is some kind of funding where they will pay for that. They will pay for first months and deposit to get you into an apartment. It's just like you are not familiar, you don't know about those things, so you don't come out and ask about them. They won't come out and they won't tell you either. These are things that I learned from going through the domestic violence.

Cindy: How can I get that information for that?

Martha: That's through your GAIN worker. You contact your GAIN worker... You come to GAIN. You ask them about their services. Right now, if you feel like mentally you are stressed out, that you can't do it, then you tell them that you want mental health. Mental health will help you as far as, they won't have you sanctioned.

Thus, participants gave many reasons for why they did not comply and remained sanctioned. Their decisions reflected what were, from their points of view, understandable economic, child care safety, and medical and mental problems that might have triggered help and prevented sanctions.

Program Barriers to Compliance

Incomplete Knowledge About the Sanction Process and Its Vocabulary

All the focus group members understand when their aid is reduced. What they often do not understand is exactly why, what to do about it, or who can help them. They often did not understand distinctions between cuts based on income eligibility and those reflecting failure to comply with GAIN activities. Consequently, they are not always sure whether they should contact a CalWORKs Eligibility Worker (EW) or a GSW. Whatever the source of the problem, they understand the economic consequences of a reduction but may not associate it with being sanctioned because they experience fluctuations in aid on a monthly basis. For example, Darlene, a single mother of four, lost her cash aid

entirely for three months because she did not turn in her monthly CalWORKs Eligibility form (CW-7). When that problem was corrected, she got a lump sum back payment and did not realize that she had been sanctioned until the next month when her check was cut. When she asked her GSW for an explanation for the reduced amount, he told her that she had been sanctioned four months earlier for failing to attend Orientation.

As participants began to discuss the topic of sanctions in the focus groups, the first thing that had to be established was the meaning of a GAIN sanction. For example, in one group, a sanctioned single mother who faced eviction said she did not understand the meaning of the word “sanction.” Other participants offered their working definitions, although they were a bit vague about the details:

Facilitator: So Maria, you don’t understand what a sanction is? Can someone explain what a sanction is?

Anna: Basically they take your cash aid, not your children’s, but your cash aid, I believe, for the first three months, then, I think, six months, and then they take you off.

Luis: When you don’t comply with something. When you don’t take care of what you are supposed to take care of.

Almost everyone had seen the “letter that tells them they lost their cash aid.” They seemed less certain about the sanction process when dealing with words like “notice of action,” “good cause,” “appeals hearings,” and “cure.” Their statements suggested that there may have been a problem of overload: too many letters and notices, too much information, often in English only, and too few people to personally explain what the information meant. As one woman said when asked if anyone had ever explained words like sanction, noncompliance, or appeals, “They might have at Job Club, but they talk too fast.” And for some, the fear of sanctions leads participants to avoid information they have been provided.

Facilitator: Do you know about the appeals process?

Participant: I never took the time to read it. When I get a Notice of Action, I feel sick.

In practice, participants, like anyone else, tend to deal with requirements and concepts when they confront them. As one woman said when asked if anyone ever explained the rules:

If they did, I didn’t understand the words. The longer you stay in the system, you hear the words, but you don’t understand. You learn from listening to the other people [in the office] and the other recipients.

Whatever the cause, a lack of understanding seemed to be an ongoing problem for many focus group participants and a barrier for dealing effectively with noncompliance and sanctions.

When More Flexibility Might Have Made a Difference

Some participants were sanctioned and felt discouraged because they thought that their caseworkers did not flexibly apply the rules to take their situations into account. Shantee, the participant who did not show up for Job Club because she was diagnosed with breast cancer, understood what she needed to do to show “good cause” and gathered the materials to document her medical condition. She tried to explain the difficulty she had coming in as required but, according to her, was sanctioned anyway for not delivering the medical records in person. She felt her sanction was undeserved because she was doing her best to comply.

I talked with one [of the workers] on the phone, and she told me at that time to bring something in. I couldn't bring nothing in...it was due to a medical issue where I couldn't come in...I have all my paperwork from the hospital where I had the surgery, the whole nine yards, then I could have sent that in, and they could have reinstated me versus me trying to come down and sit and go through this whole waiting process. I was healing. Like I said, it just seemed unfair...how do you sanction me?

Keesha was also trying to fulfill GAIN requirements when she missed two days in her last week of Job Club because she did not have child care. In the focus group she said she had called her instructor who had told Job Club attendees to let her know if they could not come and thought the situation would be alright. But when she tried to return, she was told not to come back to Job Club and was sanctioned without receiving a Notice of Action. Discouraged that she will have to start Job Club all over again, she had not talked to her GSW in over six months. Her discouragement comes through as she simply says:

That's the problem. I have to start all back over again. Go through the whole four weeks. I was almost finished.

Luisa is an articulate, middle-aged Mexican American who mainly spoke Spanish. She had a little education in Mexico but experience as a cashier and clothes packer. She has a 12 year-old daughter, and they are living in one room. When she applied for aid, she had lost her house and job and was having a rough time financially. Luisa is a poster case of a person who wants to be in GAIN, return to Job Club, and work. However, she believes that the inflexibility of the program thwarts her objectives.

She initially went to Job Club and with a number of other participants and was offered a position in a Compact Disk (CD) manufacturing company. She passed all the tests, including English, but, according to her account, GAIN claimed she did not qualify because she had not been in the program long enough. Later, she was given an appointment with vocational training, but her worker was not there. She requested, but never received, another appointment. Meanwhile, she found work but has been sanctioned for three months because she was unable to meet her 32 hour a week work requirement. She missed some days when she had an asthma attack. She wants to

work but in conditions that would not provoke her attacks (not too hot or too cold). Her caseworker suggested that she get disability. However, Luisa refused because she wants to work and would, therefore, not qualify. She sees her case as a problem of inflexibility, the failure of GAIN to encourage her desire and ability to work by implementing a plan that would combine her work hours with vocational training. Luisa explains her situation:

My caseworker told me...that I have to return to the program, and I would need to go to a lot of doctors that would prove that I am disabled. I simply did not want to talk to her any longer because I did not, at any point, tell her that I am disabled and can't work. I told her that I wanted to work, and that I wanted to comply with all the rules of the program.

...I...have tried to explain to them my situation...when I call my worker, and I explain my situation, she will tell me, "Ma'am you already came to the program, you know the rules. You know why you are sanctioned. Wait until you get an appointment. Have a good day, good bye."

Administrative and Communication Problems

In addition to the perceived inflexibility in the application of rules that sometimes seemed to hinder rather than encourage participation, some participants thought that administrative errors and communication problems also created barriers to their compliance. They talked about receiving Notice of Action telling them to meet with their GSW or to attend a required GAIN activity too late for them to comply. In focus groups, GSWs also reported delays in updating addresses caused by communication problems between GEARS and LEADER. Whatever the source, Socorro got her appointment letter to attend GAIN Orientation the day after Orientation was held. Trying to establish "good cause" to avoid an automatic sanction for missing the appointment, she felt that she encountered poor communications with GAIN workers and no action to decide about the legitimacy of her reason for not attending. From her viewpoint, a sanction that should not have happened compounded her deteriorating situation.

They sanctioned me because...I got the notice [to come to the GAIN program] one day after the appointment date. And I struggled a long time trying to communicate with the workers here to tell them to give me another opportunity or appointment. And they told me that I needed to speak with a supervisor...if the supervisor gave me another opportunity, they would send me a letter, and I still have not received a letter. But suddenly, they took away my Food Stamps. And then, I was in an accident, and I broke my foot, and since then, I have not been well. I have seen many doctors because I have a lot of problems. And right now, I can't work...

A number of participants reported receiving no Notices of Action at all prior to being sanctioned. Lisa said she did not receive the information telling her about the requirement to participate in GAIN. It may partly have been because she was homeless and using the DPSS district office as her mailing address. When she stopped receiving aid after four months, she said she did not know why, since her GSW had told that

because she was homeless, she did not have to participate in GAIN. Since losing her aid, Lisa claims that she has been trying unsuccessfully to contact her GSW about three times a week.

I called her, and I left her messages, and she never returned my calls. Every time I would call her, it would be hard to get in contact with her. If the line wasn't busy, she would say, "Call back later," because it wasn't her time to talk to people. Then, when I would call back, her line was busy, and I would call and call, and then, when I got a hold of her, she would tell me that her hours were up, and I just have to try another day.

Because she is not allowed to continue to stay in her mother's Section 8 housing, Lisa desperately wants to cure her sanction. She feels she has no alternative but to continue trying to get through to her worker. Researchers suggested to Lisa that she may have been calling her Eligibility Worker instead of her GSW, since GSWs, unlike EWs, do not have set calling hours. She insisted that she was calling her GSW.

Participants in the focus groups reported numerous computer and other administrative errors that resulted in sanctions and made compliance with GAIN regulations and resolution of noncompliance and sanctions difficult. Darlene got sanctioned when her GSW changed, and the second GSW made a different decision about exempting her from going to Orientation. She had been finishing a semester at school and taking final exams when she first got the letter calling her to Orientation. She contacted her GSW about the letter, and he said that she would not have to go to Orientation since she was in school full-time. In the meantime, her aid was stopped completely because she failed to submit a required quarterly income statement. She only realized that something was wrong four months later when her aid was restored at a lesser amount. Since her GSW had been changed, she contacted the Supervisor who told her that she had been sanctioned, despite the fact that the first GSW had excused her, because attending school was not a "good cause" reason for not going to Orientation. Since she had tried to adhere to regulations, she felt the decision was unfair, especially because she did not know about violating any rule.

Once you get to know your worker, they change them, and they don't know what is going on. New workers don't know your history and cause problems.

Darlene took the sanction because she did not know or understand the rules for noncompliance, "good cause," or appeals hearings. What she did know is the cost to participants of frequently shifting caseloads. As she said:

The two workers don't know what is going on—the [first one] didn't know that noncompliance was going to happen. If I knew the sanction was going to happen, I'd take care of it.

Do the Threat of Sanctions and Sanctions Secure Compliance With GAIN Regulations?

Focus groups cannot provide a statistical and quantitative answer to the question. However, the qualitative data from focus groups can help us understand how sanctioned parents make decisions about complying with GAIN rules and on what grounds. Their decisions involve many factors: evaluations of their sanction (Was it fair? Was it unjust?), the program (Does it serve my needs?), and the costs and benefits of noncompliance (Can my family afford a reduction of income? Would I be better off not having to deal with the regulations?)

Focus group findings reveal that after sanctions, most participants weighed the pros and cons of participating in GAIN in new ways. Karl employed the economic approach. He thinks that sanctions are good, but after making a cost/benefit analysis, he will take the sanction and lose his cash aid. He reasons that the heavy schedule of Job Club would interfere with his ability to pursue his unpredictable, but profitable, work projects:

I don't think I'm going to be able to comply... It's not possible for me to comply...My rent is \$1,100-\$1,200. I have to get out and do something else. The system is not really set up to help. I understand their intention is very good. That's a great thing for the people who fit into those guidelines.

While sanctions may motivate some to get off of welfare and find a job, this is not an option that works for everyone, especially those with few skills and little work experience. Lisa needed whatever help GAIN could provide to enhance her chances of becoming self-sufficient. And after her sanctions experience, she, like Karl, wanted to make it on her own. She tried and got a low-paying job but was soon laid off.

I thought about just trying to stop. I've been looking for a job, I did get a job [picking up carts from the parking lot at Food for Less],...and they try all these people out, and then they only keep like three people. I had a job for like a month, but then after that, they let mostly everybody go.

Perhaps anticipating that the same thing would happen to her if she left the program right away, Joan stayed in GAIN as part of a long-term strategy to become self-sufficient, piecing together resources—GAIN's child care and transportation support—while she goes to school.

I want to get a job...and just stop dealing with them...If you try to call them, they never return your calls, and they never answer. They are at lunch. They are busy. "Call me back later." It's a hassle with them. I ask them a question, they don't even explain to you, "Call me back later or come to the office." When you are there, "Come back another day." It's just too much. Then dealing with the kids or babysitting or taking them to the office, it's a lot of problems.

...that's why I just wanted to get this over with because I'm planning to finish school and planning on getting a job so I wouldn't have to get aid anymore...So I'm just going to do it for me and my kids...the reason I got the help [is] so they

could help at least right now that I'm going to school with the transportation and the child care. As soon as I get a job, I'm not going to be in here so I can avoid having to get sanctioned.

As these cases suggest, financial calculations are only one factor, and not necessarily the most important one, in deciding to comply or not comply with GAIN requirements. Focus group participants expressed a wide variety of reasons for their decisions grounded in their personal situations and perceptions of the GAIN program. Javier tried to attend Job Club while he was suffering from severe depression but felt he got no help from the staff. He dropped out of the program because his experience was so traumatic and demeaning.

Shantee and Norma took sanctions because they had concerns about child care and wanted to take care of their own kids. Shantee expressed her belief in sanctions but prefers a sanction over participation because she is disillusioned by the way GAIN has treated her. In her view, she was unfairly denied an exemption when she was recovering from the effects of her cancer surgery.

To be honest, I really believe that the concept is a good one... The reason being is because there are some people who are just abusing the system. But I believe that for people like, when my case happened, with my medical issue and stuff like that, that you get so disappointed, you just say "forget it altogether"...if it not be for that other little income, you would be like, "Why? What is the purpose? Let me go and work a little bit harder to make up for that loss."

Shantee did not fight back and contest the medical decision. Now her efforts to survive her sanction financially have led to further trouble—a fraud investigation.

I'm going through something right now with the County, the exact same thing, where there was a breakdown. But in the end, I may be the one that pays the ultimate price. It's like I said, if you do something on the side, trying to cover the bills and stuff, now it has become an issue of fraud. It wasn't intended to be that way, but then when you do report it, they take it from you anyway. They already know that what they are giving you is not enough. So it's like what do you do?

Some people have a strong support system and others don't. So then you are left dealing with this thing on your own. ...Then when you try to make the ends meet, they then say you are frauding. It's unfair. It is really unfair.

Given these case studies, did sanctions and the threat of sanctions encourage participants' adherence to GAIN's requirements for involvement in the program? The answer is "not necessarily." It all depends on the participant's situation and their experience with the GAIN program.

Good Caseworkers More Than the Threat of Sanctions Encourage Compliance

The focus group facilitator directly asked one group, "Do sanctions encourage participation?" Betty simply said, "No. Sanctions have little to do with participation."

She drew on her experience to explain how a good caseworker made the difference for her. She had received a Notice of Action saying she would be sanctioned for filling out a form incorrectly. She had submitted a letter once before and thought she would not have to do it again. Her worker believed her when she said she made a mistake, and she was not sanctioned. Betty admitted that she had no conception of the compliance process until she actually faced the problem. Like some other first-time sanctioned participants, she thought she would lose her whole grant. Her current understanding of the importance of good caseworkers in achieving compliance came out in her exchange with the facilitator.

Facilitator: What is your view of sanctions?

Betty: It has both positive and negative results. It forces discipline into people's lives, but at the same time, it is a form of control. It's basically a threat and control, and it gets fear into a mother. Yet, it does reinforce structure, but in a negative way.

Facilitator: Do sanctions encourage parents to fulfill their welfare to work plan?

Betty: Not really, it has more to do with the individual workers than the rules. If people care about you, you do better and don't break the rules.

Facilitator: Do you think they have created a particular incentive to avoid sanctions in the future?

Betty: Well, yes, if he [caseworker] would explain everything to me, it would have been okay with me. Me having to participate, I understand that we are getting money so we have to do something for ourselves. When I went to Job Club, the lady that was my instructor, she explained a lot of things to us that I would have never known if I would have never attended Job Club...She was telling us the truth. Telling us how it is. I mean, I'm glad that because I went there, I learned a lot of things. My worker, he's actually the main person that's supposed to be letting us know what is going on and what we can do. He didn't let me know anything.

A Plea for Understanding Our Situation

Betty: They don't know. They are not in our shoes. They don't know what we go through without money. They don't know where we are going to stay, are we going to eat, are our kids going to eat. They don't know that. They just go ahead and do what they have to do.

I know there are a lot of people that they deal with, but we should at least be able to talk to them when there are problems like that. They have to understand what we have to go through. It's their job. They should at least try to help us...because we have to be calling them and calling them. What I'm going through is a lot...That's kind of hard. I've been calling for like a month, two months already, and they still don't return my calls.

Betty firmly believed that good workers who take time to listen, try to understand the situations of participants, and can clearly explain the rules could make all the difference when it comes to avoiding sanctions. Interestingly enough, the same theme was expressed in the GSW focus groups, although less was said about understanding the situations of participants. Two different worlds, two different situations. Betty's plea was for bridging the gap.

Conclusion

Most participants in the focus groups did not want to be sanctioned and lose the adult portion of their cash aid. Almost all made efforts to come into compliance or cure their sanctions, at a minimum by trying to contact their caseworkers to discuss the cause and what to do about it. However, in the larger picture of their lives, the threat of sanctions was not always the single most important factor in participants' decisions to comply with the program. At a given point in time, the program may not serve their needs and the priorities of their families, for example, health problems or the decision to take care of their own infants rather than endanger them by placing them in the care of strangers. Others needed more income to support their families than cash aid and income allowances permit or feel their long-term ability to provide for their families required education or job training that they believed was not encouraged by GAIN. They argued that participating in the program and following the schedules of Job Club and the 32 hour work requirement could interfere with their ability to hold a job or go to school. Weighed against the extra income from even low-wage jobs or the benefit of schooling, the loss of their cash aid was bearable as long as they retained Medi-Cal and Food Stamps.

In other cases, some of the problems that contributed to participants' noncompliance in the first place also contributed to their failure to cure sanctions: lack of knowledge and understanding of the sanction process, perceived rigidity of the programs, problems contacting their caseworkers, and bureaucratic errors in getting appointment letters in a timely fashion. Finally, the more important question may not be, do sanctions achieve compliance, but rather, What factors, including sanctions, lead to participation in GAIN? Some participants moved the focus group discussion to this level. They argued that the key to participation was less the threat of sanctions than the quantity and quality of their contact with caseworkers—whether they understood their situations, clearly explained requirements and benefits, and applied the rules flexibly. In sum, findings from focus groups suggest that sanctions have an affect on compliance, but that it is only one among many influences, including the quality of casework and the immediate life situations of participants.

The experiences of a small group of parents provide vivid insights into their lives, but cannot be generalized to the participant population or to the GAIN program as a whole. However, to the extent that similar themes appear in GSW focus groups and GSW and participant surveys, there may be grounds for generalizing these findings to the larger population of sanctioned GAIN participants.

CHAPTER VI

Case Workers and Sanctions

In an effort to understand the sanctions process from the perspective of the case managers, a survey was developed to assess their views on the sanction process and their experiences with the process, the size of their caseloads, and the characteristics of their work experience. The survey asked GAIN Services Workers (GSWs) and GAIN Services Supervisors, both of which interact with GAIN participants on a daily basis, to complete a questionnaire about their role in the sanctions process. The survey results presented in this chapter are complemented by focus group interviews that were conducted with GSWs. The results of these focus group interviews are presented in the next chapter.

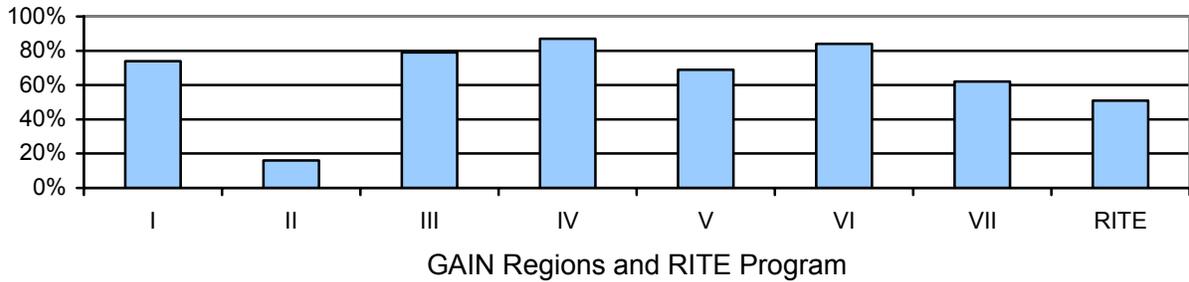
Survey Data Collection

All GAIN offices were included in the survey data collection. Among the seven surveyed GAIN Regions in which GAIN participants are served, five of the regions were offices administered by DPSS, and two regions were agencies with which DPSS has a contractual agreement for GAIN services delivery. These agencies are: 1) Affiliated Computer Services, Inc. (ACS); and 2) MAXIMUS, Inc.. In addition, survey data was also collected from the Refugee/Immigrant Training and Employment (RITE) offices that provide services to GAIN participants. The RITE offices primarily serve non-English-speaking and non-Spanish-speaking participants, and they mainly consist of Asian enrollees. Contract case managers and supervisors were asked to complete the same survey as the one administered to DPSS employees.

The surveys were conducted in July 2004, over a three-week period. A total of 770 surveys were delivered to the GAIN offices. The response rate for the survey was 70.3 percent (541 surveys). Survey questions and response frequencies are included in Appendix A. The response rate among GAIN Regions and the RITE offices varied. ACS offices or GAIN Region II had the lowest response rate (16 percent), and GAIN Region IV, administered by DPSS, had the highest response rate (87 percent) (Figure 6.1).

Figure 6.1

Survey Reponse Rates by GAIN Regions and RITE Program



Note: GAIN Regions II and VII are contract offices served by ACS and MAXIMUS, Inc. respectively. Services in the RITE offices are also administered by contractors. The RITE offices are located throughout the County. Source: GAIN Employee Survey, July 2004.

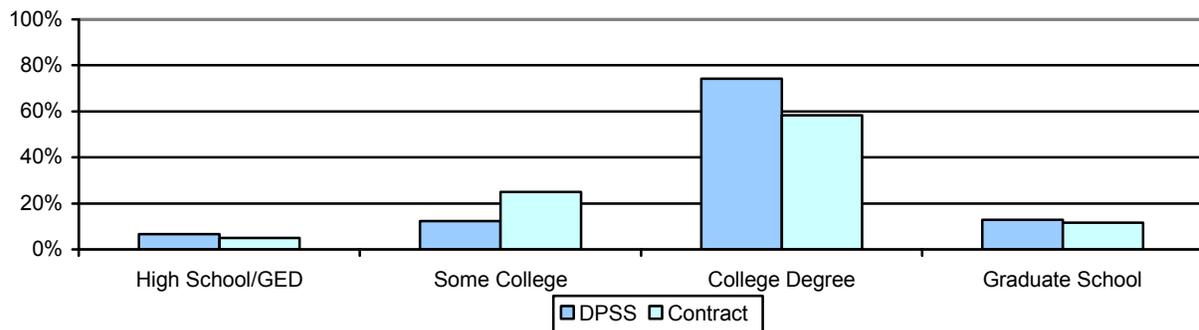
Most GAIN Service Workers Have a College Degree and a Large Caseload Size

GSWs are responsible for managing large caseloads of GAIN participants. About 12 percent of the survey respondents reported caseloads of less than 75 participants, 28 percent reported caseloads of between 76 and 100 participants. An even higher proportion (41 percent) reported caseloads between 101 to 125 participants and 16 percent reported caseloads of more than 125 participants.

Approximately 72 percent of the staff surveyed had a college degree and an additional 13 percent had graduate school education. However, there were significant educational differences between DPSS case workers and contractors: Close to three-quarters of the DPSS respondents (74 percent), compared with 58 percent of the contract staff, reported that they had a college degree (see Figure 6.2).

Figure 6.2

Education Level of GAIN Employees



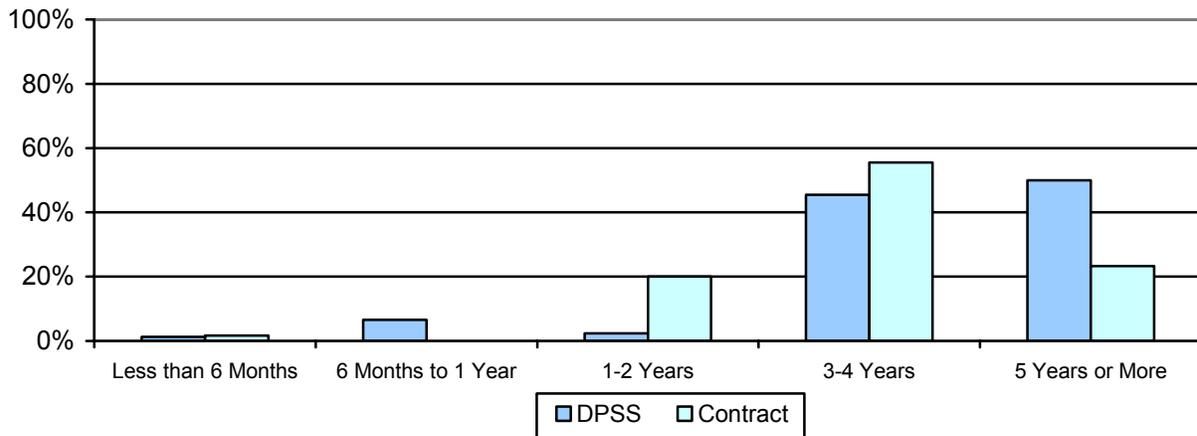
Source: GAIN Employee Survey, July 2004.

GAIN Service Workers in DPSS offices had More Years of Work Experience

When asked about work experience or the length of time employed in their current position, a large majority (94 percent) of surveyed caseworkers said they had worked for three or more years at their current job level. Overall, approximately 47 percent of the staff reported they had worked for three to four years, and 47 percent had worked for five years or more. There were significant differences between DPSS and contract staff members in terms of work experience: Half of the DPSS respondents, versus 23 percent of the contract staff, reported that they had worked for five years or more. About 20 percent of the contract staff, versus only 2 percent of the DPSS staff, had worked at their current level for 1 or 2 years (Figure 6.3).

Figure 6.3

Years Worked at Current Job Level



Source: GAIN Employee Survey, July 2004.

Number of GAIN Participants Recommended for Sanctions in the Past Six Months

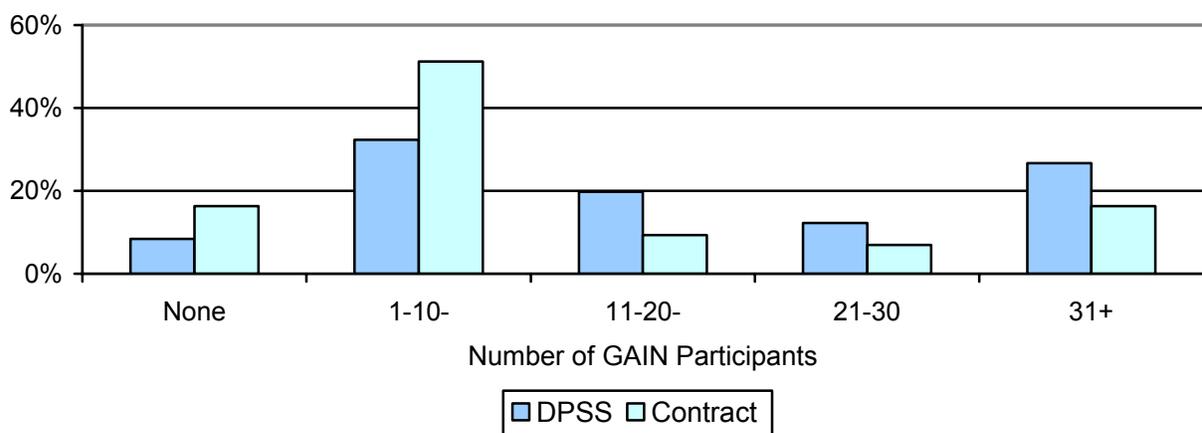
Survey respondents were asked how many GAIN participants they recommended for sanction in the past six months. Among those who responded, 9.5 percent had not recommended any sanction, 35.4 percent had recommended between 1 and 10 sanctions, 18.4 percent had recommended between 11 and 20 sanctions, 11.5 percent had recommended between 21 and 30 sanctions, and one quarter (25.3 percent) had recommended more than 31 sanctions in the past six months.

A breakdown of the sanction frequencies by DPSS versus contract employees showed that sixteen percent of the contract employees, versus 8 percent of the DPSS employees, did not sanction any GAIN participants in the past six months. About half of the contract employees, versus one-third of the DPSS employees, had sanctioned between 1 and 10 participants in the past six months (Figure 6.4). However, it should

be noted here that the number of contract employees who responded to the survey (n = 60) was substantially lower than the respondents in the DPSS offices (n = 481). As such, interpretation of data from contract offices should be made with caution since smaller numbers generally produce more skewed or extreme findings.

Figure 6.4

**Number of GAIN Participants Recommended for Sanctions
in the Past Six Months by Gain Service Workers in DPSS
and Contract Offices**



Source: GAIN Employee Survey, July 2004.

Number of GAIN Sanctions Lifted or Cured Between June 2003 and July 2004

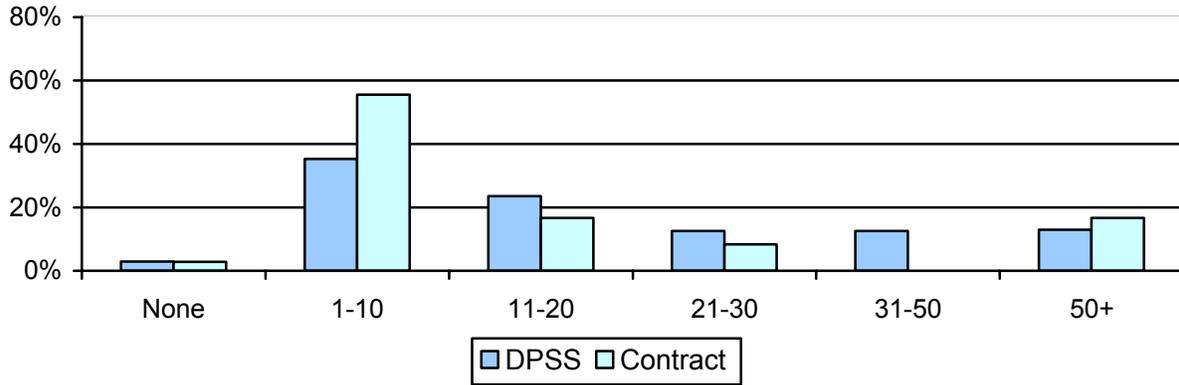
The majority of the GAIN workers (97 percent) reported that in the past one year they had lifted or cured some sanctions. Only 3 percent of the GSWs reported that they had not lifted or cured any sanctions in the past one year.

A little more than a third of the GSWs (38 percent) reported that they had cured less than 10 sanctions and 14 percent had cured 50 or more sanctions. The remaining 53 percent of the GSWs had cured between 11 and 50 sanctions in the past one year, i.e., between July 2003 and July 2004 (see Figure 6.5).

Fifty-six percent of GSWs in the contract offices reported curing between 1 to 10 sanctions compared with 35 percent GSWs in the DPSS offices (see Figure 6.5). Slightly more GSWs in the contract offices cured more than 50 sanctions compared with GSWs in the DPSS offices (17 percent versus 13 percent.)

Figure 6.5

Number of Sanctions Cured Between July 2003 and July 2004



Source: GAIN Employee Survey, July 2004.

Descriptive Analysis of Staff Survey Questions

The staff survey asked GSWs a variety of questions related to their experiences in working with the GAIN program. The employee survey asked questions related to issues such as the implementation of sanctions policies and procedures, difficulties involved in implementation of sanctions, methods used to explain compliance policy to participants, and perceived barriers to compliance among GAIN participants.

Since the GSWs were not tracked over time, it was not possible to attribute their opinions on implementing sanction policy as a causal factor leading them to sanction a high or low numbers of participants. Their opinions could be a result of their experience with implementing sanction policy or a factor associated with their sanction rates. Therefore, most of the survey questions were not used as predictor variables in a multivariate model predicting sanction rates among GSWs.

The survey questions were examined via descriptive statistics using chi-square tests for categorical variables and ANOVAs for continuous variables. The aim of this descriptive analysis was to explore the distribution of the variables and to see if they differed by the number of GAIN participants sanctioned or recommended for sanctions in the past six months.

The distribution of the number of participants recommended for sanction by GSWs in the past six months was categorized into the following four categories: 1) None, 2) 1-10, 3) 11-20 and 4) 21 or more. The results from this descriptive analysis are presented in Table 6.1.

GAIN Service Workers (GSWs) with a lower caseload sanctioned fewer participants than GSWs with a higher caseload

The data in Table 6.1 indicates that GSWs who had not sanctioned any participant or who had sanctioned less than 10 participants had a generally lower caseload than GSWs who had sanctioned more than 10 participants. About 10.7 percent of the GSWs who had not sanctioned participants in the past six months had a caseload of 1 to 50 participants compared with 1.8 percent GSWs who had sanctioned 21 or more participants. Similarly, only 3.6 percent of GSWs who had not sanctioned any GAIN participants had a caseload of 150 participants or more compared with 14.8 percent GSWs who had sanctioned more than 21 participants.

There were generally no differences between employee's work experience at the current level and the number of participants sanctioned by the GSWs. The majority of the GSWs had a college degree and differences in their educational level were not associated with the number of participants they sanctioned.

Implementing Sanction Policy

The staff survey asked GAIN employees a series of detailed questions regarding the sanctions process. These included the process of informing participants about sanctions, the various methods used to explain compliance policy, the reasons why participants become noncompliant, and the steps taken by staff to inform participants about noncompliance before issuing Notices of Action. These factors were also explored using descriptive statistical tests to determine differences in sanction rates among the GSWs.

Explaining Compliance Policy

During the various occasions when GAIN employees explained compliance policies to GAIN participants, more employees undertook this explanation at Orientation appointment compared with other appointments such as at Assessment, Welfare-to-Work plan or compliance interviews.

Employees were also asked about the methods they used to explain DPSS' compliance policies to participants. Out of the different methods, i.e., explanation by phone, by mail, in one-on-one interviews, and group sessions, the majority of the employees explained this process in one-on-one interviews, followed by phone and then by mail. It should be noted that only a third of the GSWs (37 percent) used only one of the above methods to explain the compliance policy to participants in their caseload. The majority (63 percent) used more than one of the above methods to explain the compliance policy.

Why Do Participants Fail to Show Up for Orientation?

More than half the GSWs cited child care problems as the reason why participants do not show up for Orientation

Sixty percent of the GSWs who sanctioned GAIN participants in the past six months reported that participants did not come to Orientation due to child care problems compared with 51.7 percent of GSWs who did not sanction any participant. Half the GSWs (51.7 percent) who did not sanction any participant said that participants did not understand they had to show up for an appointment compared with only a quarter of the GSWs (24.1 percent) who sanctioned more than 20 participants.

Sanction rate among GSWs varied by whether or not participants went to Orientation

Among the various reasons for noncompliance such as not going to Orientation, need for child care, transportation assistance or specialized supportive services, the only statistically significant difference by sanction rate among GSWs was participants' attendance in Orientation. About 17.4 percent of the GSWs who did not impose any sanctions in the past six months said that the main reason for participants' noncompliance was "no-show" at Orientation compared with 31.5 percent of the GSWs who sanctioned between 1 and 10 participants.

Approximately 88.9 percent of the GSWs that sanctioned more than 21 participants reported that participants always or frequently did not show up for Orientation compared with 71.4 percent of the GSWs who did not sanction. Similarly, GSWs with higher sanction rates (more than 21 participants) reported that participants always or frequently did not respond to Notices of Action compared with GSWs who never sanctioned any participant in the past six months (61.7 percent versus 38.5 percent).

GSWs perception of participants' noncompliance due to personal and program barriers

An index scale measuring staff perceptions of how frequently participants were noncompliant due to personal barriers was constructed. This index scale measuring participant's need for specialized and non-specialized supportive services was a sum of three variables: 1) the need for child care; 2) transportation problems; and 3) the need for specialized supportive services. The scale reliability (Cronbach's alpha) was .75. Another index scale measuring staff perceptions on how frequently participants were noncompliant due to program barriers was constructed. This scale was a sum of six items: 1) Participants did not show up for Orientation; 2) Participants were unaware of program requirements; 3) Participants did not understand the compliance process; 4) Participants failed to show up for appointments; 5) Participants did not receive appointment letters in time to make it to the appointment; 6) Participant could not contact the GSW by phone. The scale reliability was .76 (Cronbach's alpha).

GSWs who sanctioned 21 or more participants had a higher mean score regarding their perception of participant's program barriers to compliance compared with GSWs who did not sanction any participants (mean = 14.5 versus 12.8). Differences in GSW's sanction rates and its association with their perception of participants' need for supportive services was mixed. GSWs who sanctioned between 1 and 10 participants had the highest mean score on this scale (mean = 11.5) followed by GSWs who sanctioned 21 or more participants (mean = 11.2). At the same time the mean score on this scale for GSWs who did not sanction any participant was also quite similar (mean = 11.0). The need for specialized supportive services would allow participants to be exempt and therefore not lead them to being sanctioned. However, participants have to first attend Orientation in order to avail themselves of these services. The fact that the association of this scale (need for specialized and non-specialized supportive services) with differences in sanction rates was small may indicate that participants who use these services are also less likely to be sanctioned.

Table 6.1

Implementation of Sanction Policy by GAIN Staff Workers and Number of Participants Sanctioned or Recommended for Sanctions in the Past Six Months

Variables	Participants Sanctioned in the Past Six Months			
	None (N = 28)	1-10 (N = 108)	11-20 (N = 56)	21+ (N = 108)
Caseload* (%)	10.7	4.7	5.4	1.8
1-50	7.1	8.5	16.1	12
51-75	32.1	45.3	25	18.5
76-100	28.6	32.1	32.1	39.8
101-125	17.9	5.7	10.7	13
126-150	3.6	3.8	10.7	14.8
151+				
Years Worked at Current Level (%)				
Less than 6 months	3.6	1.9	1.8	0
6 months to 1 year	0	0.9	0	0
1-2 years	0	5.6	3.6	2.8
3-4 years	57.1	50	57.1	56.5
5 years or more	39.3	41.7	37.5	40.7
College Degree or Higher (%)				
Yes	86.2	78.7	92.9	83.9
No	13.8	21.3	7.1	16.1
Inform Participants of GAIN Program Requirements at: (%)				
Orientation*				
Yes	27.6	48.2	55.4	57.1
No	72.4	51.9	44.6	42.9
Assessment/Appraisal				
Yes	20.7	35.2	28.6	29.5
No	79.3	64.8	71.4	70.5
Welfare-to-Work Plan				
Yes	27.6	31.5	26.8	19.6
No	72.4	68.5	73.2	80.4
Compliance Interview				
Yes	37.9	37	44.6	36.6
No	62.1	63	55.4	63.4
Methods Used to Explain Compliance Process: (%)				
Phone*				
Yes	48.3	47.2	58.9	66.1
No	51.7	52.8	41.1	33.9
Group session*				
Yes	6.9	10.2	23.2	23.1
No	93.1	89.8	76.8	76.9
One-on-one interview*				
Yes	62.1	85.2	89.3	78.6
No	37.9	14.8	10.7	21.4
By mail				
Yes	41.4	36.1	46.4	47.3
No	58.6	63.9	53.6	52.7
Number of Methods Used to Explain Compliance Process* (Mean)	1.6	1.8	2.2	2.1

Table 6.1 (Continued)

Implementation of Sanction Policy by GAIN Staff Workers and Number of Participants Sanctioned or Recommended for Sanctions in the Past Six Months

Variables	Participants Sanctioned in the Past Six Months			
	None (N = 28)	1-10 (N = 108)	11-20 (N = 56)	21+ (N = 108)
Participants Fail to Show Up for Orientation due to:				
Transportation problems (%)				
Always/Frequently	31.0	36.1	39.3	33.9
Sometimes/Never	69.0	63.9	60.7	66.1
Child care needs (%)				
Always/Frequently	51.7	67.6	58.9	59.8
Sometimes/Never	48.3	32.4	41.1	40.2
Not understanding that they have to show up* (%)				
Always/Frequently	51.7	29.6	28.6	24.1
Sometimes/Never	48.3	70.4	71.4	75.9
Not receiving appointment letters on time (%)				
Always/Frequently	37.9	33.3	42.9	40.2
Sometimes/Never	62.1	66.7	57.1	59.8
Not receiving appointment letter on time so they can make it to the appointment (%)				
Always/Frequently	37.9	31.5	50.0	42.0
Sometimes/Never	62.1	68.5	50.0	58.0
Participants are noncompliant because they:				
Do not show up for Orientation* (%)				
Always/Frequently	17.4	31.4	16.0	13.0
Sometimes/Never	82.6	68.6	84.0	87.0
Need child care (%)				
Always/Frequently	68.2	65.4	56.9	53.3
Sometimes/Never	31.8	34.6	43.1	46.7
Need transportation (%)				
Always/Frequently	77.3	78.6	72.3	75.7
Sometimes/Never	22.7	21.4	27.7	24.3
Need specialized supportive services (%)				
Always/Frequently	100.0	92.2	90.2	89.5
Sometimes/Never	0.0	7.8	9.8	10.5
Frequency with which participants are noncompliant because of:				
Program barriers* (mean)	12.8	15.5	14.1	14.5
Need for specialized and non-specialized supportive services* (mean)	11.0	11.5	10.2	11.2
Before issuing a Notice of Action, how frequently do you: (Mean)				
Determine appropriate compliance plan or probe for language or cultural barriers?	9.6	10.2	10.0	10.4
Provide additional information on program services?	24.0	26.3	24.6	26.5
Do Participants understand "very well" that noncompliance with GAIN activities will result in reduction of cash grant?[†] (%)				
Yes	60.0	73.3	70.4	57.9
No	40.0	26.7	29.6	42.1

Table 6.1 (Continued)

Implementation of Sanction Policy by GAIN Staff Workers and Number of Participants Sanctioned or Recommended for Sanctions in the Past Six Months

Variables	Participants Sanctioned in the Past Six Months			
	None (N = 28)	1-10 (N = 108)	11-20 (N = 56)	21+ (N = 108)
How frequently do participants fail to show up for: (%)				
Orientation[†]				
Always/Frequently	71.4	78.6	88.2	88.9
Sometimes/Never	28.6	21.4	11.8	11.1
Assessment				
Always/Frequently	45.8	40.2	32.0	43.3
Sometimes/Never	54.2	59.8	68.0	56.7
Respond to phone calls				
Always/Frequently	58.3	51.5	50.0	56.1
Sometimes/Never	41.7	48.5	50.0	43.9
Respond to Notice of Action				
Always/Frequently	38.5	51.0	50.0	61.7
Sometimes/Never	61.5	49.0	50.0	38.3
Show up for appointments*				
Always/Frequently	54.2	61.8	83.3	74.8
Sometimes/Never	45.8	38.2	16.7	25.2
Lack of understanding compliance policy by the participants due to:				
Language barriers (%)				
Always/Frequently	19.1	8.8	18.2	17.5
Sometimes/Never	80.9	91.2	81.8	82.5
Belief that he/she is compliant (%)				
Always/Frequently	33.3	25.3	17.9	25.0
Sometimes/Never	66.7	74.7	82.1	75.0
Need for specialized supportive services (%)				
Always/Frequently	14.3	12.6	14.3	15.8
Sometimes/Never	85.7	87.4	85.7	84.2
Frequency with which participants are sanctioned due to: (mean)				
Not understanding program requirements	6.9	7.1	6.6	7.3
Not showing up for Welfare-to-Work Activities	6.5	7.3	7.5	7.7
Failing to comply with program activities	12.2	13.6	13.5	13.6
Not responding to requests on time	8.2	8.7	8.7	9.1
How frequently are sanctions issued in error because: (%)				
The GSW could not reach Eligibility Worker				
Always/Frequently	17.4	18.5	20.7	17.5
Sometimes/Never	82.6	81.5	79.3	82.5
Documentation for good cause was received after the 21st calendar day				
Always/Frequently	18.2	36.1	47.1	40.8
Sometimes/Never	81.8	63.9	52.9	59.2
Appointment letter arrived too late				
Always/Frequently	8.3	18.6	25.5	23.0
Sometimes/Never	91.7	81.4	74.5	77.0

Note: * = statistically significant at $p \leq .05$, [†] = $p > .05$ and $\leq .10$.

Source: GAIN Employee Survey, July 2004.

Predicting Sanctions

Multivariate analysis was conducted to examine the factors associated with the number of participants sanctioned by GAIN employees in the past six months. About 10 percent of the surveyed employees reported that they had not sanctioned any participants in the past six months. Another 35 percent said that they had sanctioned between 1 and 10 participants, 18 percent said that they had sanctioned between 11 and 20 participants, 11 percent said that they had sanctioned between 21 and 30 participants, and 25 percent said that they had sanctioned more than 31 participants in the past six months.

The following dichotomized scheme was created to predict sanction rates among GSWs:

- *0 = 0 to 10 participants sanctioned in the past six months*
- *1 = More than 10 participants sanctioned in the past six months*

Logistic regression was used to predict factors associated with employees imposing sanctions on 11 or more participants in the past six months. In the logistic model, the predictor variables primarily included employees' background characteristics, namely **education** (college versus less than college), **Office type** (DPSS versus contract), **caseload**. In addition, some questions in the survey that directly asked the employees about the steps they took to reduce noncompliance were also used as predictor variables. This included providing additional information (**info**) about program services before issuing a Notice of Action and the methods (**method**) used by employees such as group sessions, sending notices by mail or explain process and procedures over the phone. The equation for this model was:

$$\text{Prob (sanctioning 11+)} = \text{intercept} + \text{office type} + \text{education} + \text{caseload} + \text{info} + \text{methods} + \varepsilon \text{ [Eq 6.1]}$$

Caseload and Explaining Compliance Policy in Group Sessions Was Associated With More Sanctions

Contract case managers had a lower probability of sanctioning than DPSS case managers. It should be pointed out, however, that differences in sanction rates between DPSS and contract offices may be at least in part due to differences in the types of GAIN participants served in these offices. GAIN participants in the RITE offices, for example, consist mostly of immigrants and refugees. Barriers to compliance among these types of participants are likely related to language difficulties compared with other GAIN participants who may be experiencing other non-language barriers to compliance. Further research needs to be conducted to examine how differences in client populations impact sanction rates in DPSS and contract offices.

Larger caseloads were significantly associated with higher sanction frequencies. Education (i.e. having earned a college degree) and employment experience were not associated with higher sanction frequencies.

Employees that provided additional information to participants on program non-specialized supportive services such as child care or transportation before issuing a Notice of Action were 10 percent more likely to recommend 11 or more sanctions.

Explaining compliance policy at group Orientation or sending notices by mail, or explaining the policy over the phone were all positively associated with more sanctions.

Table 6.2		
Probability of Sanctioning 11 or More Participants in the Past Six Months (Between January – June 2004)		
	Probability (%)	Significance Level
Base Probability of Sanctioning 11+ (intercept)	-2.54 ^T	
Independent Variables		
Contract vs. DPSS	-62.2	.01
Education (College or higher)	+37.5	n.s
Caseload	+37.8	.01
Providing Information on Supportive Services Before Issuing NOA	+10.4	.05
Explain Compliance Process		
At Group Orientation	+3.22 ^a	.001
Send Notice by Mail	+76.1	.05
Over the Phone	+2.34 ^a	.09

Note: n.s = not statistically significant, ^T = marginally significant $p > .05$ and $\leq .10$;

^a Probability exceeds 100%. Number reported is the odds ratio.

Source: Employee Staff Survey, July 2004.

Model Predicting Return to Compliance

Employees were asked how many GAIN participants they had cured from sanctions in the past year. Approximately 56 percent of the employees surveyed had cured 30 or more participants in the past year. The remaining 44 percent had cured less than 30 participants in the past one year.

Logistic regression was used to predict factors associated with the likelihood of curing more than 30 sanctioned participants in the past year. The predictor variables included in this model were **office type** (DPSS vs. contract), **education** (college versus less than college), employment experience (**emp**), **caseload**, reasons (**reas**) for participants' failure to show up for Orientation, the various steps (**steps**) taken by the participants to

return to compliance, such as providing proof for good cause or participants going to State Fair Hearings.

The equation for this model was:

$$\text{Prob (curing 30+)} = \text{intercept} + \text{office type} + \text{education} + \text{emp} + \text{caseload} + \text{reas} + \text{steps} \quad \text{Eq 6.2]}$$

There were no systematic significant differences between DPSS and contract offices in the number of participants cured in the past year. Employees' education was also not associated with the probability of curing participants in the past year. However, employees with more years of employment experience had a 54 percent greater probability to cure more than 30 participants over the past year. In addition, GSWs with larger caseloads were 16 percent more likely to cure sanctions in the past year.

Independent Variables	Probability (%) Estimates	Significance Level
Base Probability of Curing Sanctions (intercept)	-1.04	n.s.
Independent Variables		
Contract vs. DPSS	-62.9	n.s.
Education	+15.4	n.s.
Employment Experience	+53.7	.05
Caseload	+16.2	.05
Participants not likely to show up for Orientation	-28.2	.09
Participants not likely to show up for Assessment	-39.5	.001
Participants provide proof of good cause	+22.3	.10 [†]
Participants likely to show up for State Fair Hearings	+37.8	.05

Note: n.s = not statistically significant,

[†] = marginally significant, $p > .05$ and $\leq .10$.

Source: Employee Staff Survey

Conclusion

The results from the staff survey help provide a better understanding of how GAIN employees implement sanction policies. GSWs use a variety of methods to explain compliance policy to participants. These methods include explanations given in group sessions, one-on-one interviews and by mail or telephone. The survey results indicate participants respond better to one-on-one attention than they do to information that is conveyed in the more anonymous setting that a group session provides. Survey results show that explaining compliance policy in group sessions, over the phone or sending information by mail was associated with more frequent sanctions. Although explaining compliance policy in one-on-one interviews was not associated with sanctioning more participants, more than 90 percent of the GSWs used this method. In addition, more than two-thirds of the GSWs used more than one method in explaining the compliance policy to their participants. This emphasizes the importance of greater communication between participants and the GSWs.

Caseload size is positively associated with more sanctions. However, large caseload sizes are also associated with higher cure rates. While the survey did not show work experience to be associated with sanctions, this experience was associated with curing participants from sanctions. This suggests that GSWs with more work experience may understand the sanction policy more thoroughly than GSWs with only limited work experience.

More than half the GSWs in all the offices reported that GAIN participants failed to show up for Orientation because they needed child care. Program efforts should be made to ensure that child care needs of participants are adequately addressed so that participants can attend Orientation. The survey results also indicate that failure to attend Orientation sometimes results from participants failure to receive appointment letters on time.

The next chapter examines these communication and information issues further through the analysis of focus group interviews conducted with GSWs. This focus group analysis complements the staff survey data with qualitative information on how GAIN workers convey compliance rules and requirements to participants, as well as the challenges staff face in attempting to insure that participants receive and understand the rules they are asked to follow.

CHAPTER VII

In Their Own Words: GSWs Talk About Sanctioning

As part of the effort to understand compliance and sanctions issues from the viewpoints of GSWs in the County of Los Angeles, researchers conducted two focus groups with thirteen members recruited from a purposeful sample of GSWs employed in two GAIN Regional Offices with relatively high rates of participant sanctions. APPENDIX C provides more details about participants and how they were selected and questioned.

What Is a Focus Group and How to Interpret Its Methods and Findings?

Focus groups are moderated, in-depth discussions on a predetermined topic that involve a small group of people who have something in common, in this case, GSWs working together in the same offices who have experiences with the GAIN sanctions process. The objective was to learn about their attempts to use sanctions to achieve compliance with GAIN requirements. The discussions centered on the following questions: How and when do they implement sanctions, including what degree of autonomy and flexibility do these GSWs have in making decisions about compliance and sanctions? Do they differ in their approaches to assuring compliance and participation with GAIN requirements? At what points in the program are sanctions most likely to occur and why? What do they see as the causes of noncompliance? What effect do working conditions have on their casework? What recommendations can they offer to reduce sanctions and assure greater compliance with the program?

To interpret the findings correctly, it is important to understand the advantages and limitations of the qualitative methods of focus groups and how they provide information that differs from, but nonetheless can complement, the information provided by the quantitative methods used elsewhere in this report. As for connections and convergences between methods, the purposeful focus group sample for selecting the GSWs was based on quantitative findings from administrative data identifying regions with relatively high sanctions. In turn, focus group findings can complement and enhance quantitative findings by revealing what statistics cannot—in this case, an in-depth “person level” exploration of perceptions and experiences with sanctions, a concrete sense of how things really happen in doing casework. In addition, focus groups may hold the possibility of discovering new information on important issues that may not have appeared in the GSW survey questions.

However, limitations of focus groups should also be kept in mind when reading these findings. While GSWs in focus groups put a human face on the survey data, their members are not representative of GSWs as a whole, and their words should not be generalized to this population. By contrast, surveys using random samples and standardized questions have the advantage of producing statistical data that identify patterns that are broadly representative of, and may be generalized to, the larger participant, and some verification of quantitative findings is possible. While the objective of the GSW focus groups is neither to generalize nor to verify what members

say that they tap experiences and perceptions that may affect their compliance and sanction work with participants. Nonetheless, a degree of generalization and verification can be achieved when focus group and survey findings converge and agree.

Finally, in reading their answers, it should be noted that GSWs are literally speaking in their own words and that everyday, unrehearsed speech is very different from a carefully crafted, grammatically correct written text. The goal of focus groups is to capture the spontaneity and unedited insights of an informal discussion. In accordance with accepted conventions for qualitative research, GSW words are quoted and indented.

Autonomy and Flexibility in Making Decisions

GSWs are on the front lines between the complex rules and regulations of the County of Los Angeles' Welfare-to-Work program and the needs of poor parents who seek aid for their families. Their job is to explain the GAIN process to participants: the required work obligations, rights, benefits, and available services; to bring parents into GAIN; to screen for psychological and other problems and refer participants to Specialized Supportive Services; to assure compliance with the program, to sanction participants for noncompliance, and to bring participants back into GAIN. Above all, with the arrival of welfare reform, parents need to understand that their aid is time-limited and contingent on evidence of their willingness to work, and GSWs are there to keep them on track. Their job is difficult. It requires detailed knowledge of the GAIN and CalWORKS programs, patience, dedication, toughness, compassion, and an array of social work and communication skills. Focus groups reveal a group of dedicated professionals working hard at the tasks.

But how much power and flexibility do GSWs have in making decisions about a participant's compliance, noncompliance, or sanction? In the focus groups, GSWs claimed considerable autonomy, flexibility, and discretion within the bounds of standard procedures. A caseworker with years of experience described the sanction process that begins when a parent fails to turn up to the first mandatory activity, GAIN Orientation and signing a contract of compliance with the program.

The system starts this way: a participant applies for public aid and gets registered in the GAIN program. The system registers her to the intake process when she comes to the GAIN program. She is given an appointment, usually [GAIN] Orientation and Appraisal. Usually the appointment is one week after a letter is mailed to the participant. If the participant shows up for the appointment (complies), then the GAIN worker continues from that point on and assigns the participant to the next activity, which is usually the Job Club. If the participant is a "no show," the system automatically will put her in noncompliance. The process of noncompliance is 21 days altogether. When the participant goes to a noncompliance, a Notice of Action is sent with a "good cause" appointment. If the participant responds to the appointment, the GAIN worker may stop the sanction based on the information provided. If that participant does not respond within 20 days, at the end of the 21st day, the sanction request goes in, and she

would be deregistered until she decides to participate in the program. Her aid every month will be reduced by the amount of her portion of the grant.

The sanctioning and curing process applies whenever participants do not comply with GAIN activities and other regulations. Within this framework, GSWs have influence and flexibility to make decisions about sanctions, especially during the 21-day noncompliance period before the participant is sanctioned and deregistered, but also after a sanction has taken place and the case is inactive. A caseworker explains.

We have control throughout the whole sanction period, from the beginning of the person coming into Orientation. When we put a participant in noncompliance, we can be flexible because we all have to understand the participant's situation. We have options to cancel or stop that noncompliance period which leads them to the sanction. Then, even when they get sanctioned, they still make contact with us, and then we personally help them establish "good cause"... "Okay, you were in noncompliance, why didn't you come?" Then they start telling us the reasons: "I had a medical family emergency, I'm sick, I'm disabled." So even though they are still in that holding cabinet (deregistered), because we were the previous worker, we can still mail them out that notice, and then when we get back the notice, request from our supervisor to bring that participant back into GAIN. So, I think we have control throughout the whole process.

GSWs in the focus groups noted another important way that they can try to avoid sanctions—by proactively contacting participants and motivating them to make their appointments and comply. Thus, rather than waiting to see whether participants show up for Orientation or a good cause appointment, they call them and send out information. A very proactive GSW explains:

Prior to the initial appointment we do...a sanction avoidance call. ...we also mail out a sanction avoidance package just in case we can't get them by phone. Our packet consists of a letter saying, "Welcome to GAIN," with a map, flyers regarding rights and responsibilities, all of this information. We make several phone calls to try to remind them, "You have an appointment on this day and this time." We also try to give them information as far as how to get to our office. We try to give them information regarding MTA. If we make the contact, we also discuss child care... We give them the address and phone number to different child care agencies that they can contact. We discuss transportation. We also discuss possible exemptions. If they have an illness, or if they are caring for an ill household family member, we try to establish that prior to the appointment so that we can give them the necessary notices that they can take to their doctor, or if they have a court date, to provide us with that information so that we can exempt them to avoid a possible sanction. If the participant failed to respond to their appointment letters or the phone calls via a return phone call or mail, such as providing "good cause" notice such as a medical exemption or notice from the court or even come into the office, then that's when noncompliance starts.

She goes on to summarize her philosophy about sanctions:

We are not out to sanction people, absolutely not. We want to help our participants. We have flexibility to start the sanctions, to start the noncompliance. We want them to come in so they can participate and see GAIN as a benefit.

However, GSWs vary in their philosophy about ways to ensure compliance. Some prefer to motivate participants with frequent contacts; others see sanctions as good tools to ensure compliance. In either case, their methods are shaped by the conditions and constraints of their work situations. These topics are taken up in the following sections of this report.

Two Strategies for Using Sanctions to Achieve Compliance

Strict Rule Enforcement and Sanctions for “Some Who Are Just Not Willing to Participate”

GSWs in our groups generally believe they are now working with the most difficult cases. They work hard to get parents involved but believe those who could most readily benefit have already gone through the program. One GSW contrasted her current caseload with those of several years ago in these terms.

We've been doing this for five years now, and initially, the first three to four years, you had a lot of employment, but now we are down to the bottom of the barrel where you have those who are hard to employ anyway. A lot of them just fell through the cracks.

Another GSW described the difficulty of getting some participants involved in Job Club, one of the “hot spots” where sanctions are most likely to occur.

...I know I will lose most of my participants who don't want to participate in Job Club...They just don't like it... once you tell them, “Look, you have to come in and comply and do this now, actually go out and look for a job,” that's when they kind of fall through.

Faced with the challenge of involving the “hard to employ” in GAIN activities, GSWs in our focus group seem to use two main sanctions strategies to accomplish their goals: strictly enforcing regulations about participation, using sanctions to remove those who fail to comply from the caseload; and a more flexible approach that seeks to avoid sanctions in order to work with participants and encourage their involvement. One GSW characterized the difference in these terms.

Some of us get rid of cases quickly. Some of us hang onto cases, and I'm sort of the worker that likes to get it out the same day. For various reasons, some workers do hang onto them longer.

This GSW believes that many participants will do whatever they can to avoid compliance, and there is little that he can do about it. Given this overall perception, allowing participants the benefit of the doubt is not worth his time and effort.

I know I don't give a lot of chances because, again, my whole presumption is that by human nature, we want to get what we want, in this case, money, but do as little as possible to get it. That's what I've seen in these participants is they want to come in, just do so much and then see you later until next time. So the next sanction occurs.

Their experience with participants whom they perceive as resisting the program often leads to mistrust. As this GSW concludes, "They know the game better than us." He explains,

They know the day they have intake. They call the same day at 8:00 a.m. or at 7:00 a.m. and say, "I can't come in, I can't find child care." I had that happen to me this week. I told the PT, "Okay, but you will need to come to the next appointment. It will be a noncompliance appointment, a cause of termination appointment. You need to come to this next appointment. You have ten days to come in and comply. In all honesty, I feel that I'm getting a lot of excuses...they call the day that they need to come in. They'll call [and] all say the same thing, "No child care, no transportation."

Another GSW who strictly enforces sanctions believes that the reason it is so hard to involve participants in the program lies in their situations—their reluctance to leave their children for work and the low-wage, often temporary, and dead end jobs that await them if they do. He believes that parents assess the benefits and downsides of participating in the program and decide to stay home with their families.

Most of the cases are single parents... Would you go out there and work for minimum wage, and after taxes, how much do you get? It affects your CalWORKs if you do that. If you stay home, take your kid to school, take care of them and make some extra cash at home or from your boyfriend...so it's not because of our services.

Although focus group members debated the issue, some felt that participants' decisions might be different if penalties for noncompliance were stiffer.

I think there should be stricter financial sanctions...so they know that this is important because we do try to paint that beautiful picture that you are going to get more education, find a better job. We do all that motivation, but obviously, it's not working out. I feel that's really the only way because money talks.

Notwithstanding debates over the effects of different sanctions penalties, strict rule enforcement and sanctioning enables GSWs to manage their caseloads more efficiently. Believing that most participants want to avoid compliance, GSWs who opt for a strict sanction policy look skeptically upon reasons for non-participation that cannot be documented. For example, accepting "good cause" reasons for noncompliance,

such as lack of child care that cannot easily be documented, involves postponing resolution of the noncompliance and the possibility of spending time with the participant exploring other child care alternatives. This GSW describes the problems entailed in dealing with “good cause” reasons.

They’ll use everything down the list to try to get out of it. I have this participant telling me she is sick, so I gave her an appointment for the following week. She is sick again, so I gave her an appointment for the following week. [But] when I called her up for not showing up for that second appointment, she told me she has no child care. “[I asked] Can you find someone to do this for you?...” I’m trying to explain all these options that she has. She is like, “Okay, but now I do not have any transportation.” It was one excuse right after the other. It’s really tough sometimes. You can’t verify all these things.

Applying the rules more flexibly requires additional follow-up work to help bring participants into compliance. By contrast, removing noncompliant participants from their caseloads frees GSWs to focus on participants who are most likely to succeed in the program.

“Giving Chances” to Encourage Participation

Other GSWs in the groups felt that it is important to apply rules flexibly and avoid sanctions whenever possible. Avoiding sanctions gives GSWs the opportunity to continue to work and encourage participants to achieve compliance. One GSW described her decision to give participants “chances” and avoid sanctions whenever possible in these terms.

...if the PT [participant] is about to be sanctioned and calls in and says, “I’m going to start working,” ...I have to put my trust in what the PT is saying. So I’ll just close the noncompliance and send out the verification of employment. I just have to put my trust in the participant. I would rather do that because I think we should give that person a chance.

Another described the work involved when she decided against giving a sanction to one of the participants on her caseload.

Usually we give many chances before putting someone into noncompliance. We try to contact the client before, do a lot of research. [If we find out there is domestic violence] we try to contact DV services to try to keep the person, and that means they’ll need mental health.

In contrast to GSWs who prefer giving sanctions to participants who resist involvement, GSWs who go out of their way to “give chances” do so precisely because they are working with the most difficult cases. They try to avoid sanctions to encourage whatever potential for involving a participant they can find.

Focus group findings reveal that GSWs based decisions about sanctions on their perceptions of participants as either unwilling to get involved in GAIN or as needing

services and support to overcome barriers to participation. Yet, even GSWs who work hard to achieve compliance without sanctions acknowledge that there are times when they must issue them. As this GSW said,

I think we want to find a way to prevent a sanction...I think we are doing what we can. It's just the PTs, some are just not willing to participate. I mean, they are able to work, and some of them have been on it for a long time, on aid, and they are just comfortable, and they don't want to go out and work.

While a number of GSWs held views about participants as a whole, giving chances or strictly enforcing the rules in a particular case depends on determining the participant's motivations and likelihood of benefiting from the program. The following section reflects what GSWs said about their methods and strategies for assessing participants as irresponsible and "out to take advantage" or as someone with potential to benefit from the program.

Sanctions Strategies Depend on "Getting a Feel for What the Person Is Trying to Do"

GSWs Who Strictly Enforce Sanctions Act on Early Indicators of Resistance and Program Involvement

In deciding whether or not to give chances and to work with a person, GSWs need some indication that their efforts may yield desired results. GSWs decide to work to encourage a participant or to strictly enforce GAIN regulations based on assessments of participant attitudes and motivation. Because they wanted to eliminate participants they felt would not benefit from the program, GSWs who favored strict enforcement and giving sanctions often attempted to make these determinations early on in the process. One GSW, for example, approached the issue directly and made determinations of whether or not the person is willing to participate a priority in the Appraisal interview.

I've had some participants [who] come in for Orientation...and some of them feel that they don't want to participate. So I give them an option, "If you do not participate, you will be sanctioned." I explain the whole process, and some say, "I do not want to participate."

This GSW structures the Appraisal interview so that he can gauge the attitude of the participant toward involvement early in the process. Refusing even minimal involvement in the first contact tells the GSW that this participant is not likely to benefit from efforts to achieve compliance, and he does not hesitate to issue a sanction. Another GSW told how he determined that a participant would not be likely to comply after an initial phone contact.

...if I spoke to a participant on the telephone...If they are really not wanting to participate...that they are not going to come in, and they are not really participating, that actually is a good reason to start the compliance process. I think that the compliance process makes sense if you are talking to the participant, and you are letting them know about the GAIN services, and you feel

a little bit of animosity over the phone that they don't want to come in. "I'm going to set this appointment for June 8th, and if you don't come in that day, I'll start the compliance process." Usually, that's when I know that I can start the compliance process ... because I see that they don't really want to take advantage of the services after I explained it to them.

In addition to individual profiles, some GSWs reported using more broadly based cultural understandings to "get a feel for what the person is trying to do." These GSWs, for example, thought that first generation Spanish-speaking immigrants were more likely to participate in the program because they are "scared" and see the program as an opportunity to advance.

GSW 1: In my experience, the Spanish-speaking population, they take the program a little bit more serious. I don't know if they are a little bit more scared or what the reason for that is, but...the way they look at the GAIN program is very different, their attitudes towards it.

GSW 2: I do have Spanish-speaking primarily, that's my caseload. In my experience, my participants see it more as an opportunity to advance. So it's really different than the English-speaking. More of them tend to come in, but still not to the degree that I would like them to.

Another GSW drew contrasts between immigrants and English-speaking participants with more experience and skill in negotiating the system.

...I'm looking at English caseloads, there are people who come from generations of people who have been on welfare. Their parents have been on welfare, and their grandparents have been on welfare, so they kind of know the system a little bit more. They kind of know what they can get away with and what they can't. They will push the limits up a little closer.

Negative impressions based on early or brief contacts with participants often resulted in sanctions. In the context of heavy caseloads and paperwork requirements, the more time that GSWs spend with participants, the more work is generated. As this GSW described his situation:

What ends up happening with giving participants a lot of chances [to comply], you become backlogged. All of a sudden, your cases are on a 30-day delinquent list. There are reports that need to be turned in about why these cases are over 30 days without a component opened. So, now, there are reports that you have to do because you are giving someone else a chance.

To achieve program goals, all GSWs wanted to see participants involved in GAIN activities and benefit from the program. Some pursued this goal by searching for signs of resistance early on. The temptation is to spend less time with participants who will be the most work, but the least likely to succeed, and to use sanctions to eliminate them from the program.

GSWs Who Avoid Sanctions “Give Chances” to Participants With Potential

Rather than sanctioning those who resist involvement, other GSWs try to avoid sanctions, focusing instead on signs of potential success and working to cultivate them. Unlike those who strictly enforce the rules, these GSWs believe that by educating and motivating, they can effect change in participants' lives. Key to this approach is going to great lengths to maintain contact and establish trusting relationships. This GSW attempts to motivate by using a “carrots and sticks” approach that emphasizes the negative consequences of non-participation but also an empathetic understanding of the participant's situation.

In preventing cases to be sanctioned, initially when you meet with the participant...we let them know about the time limits. In a way it's scaring them a little. Reality check, five years on aid, that's it. So take advantage of our program. In that way, we motivate them, and then I often use my own life as an example. I have some say, “I can't find child care. Who can I trust for child care?” ...I let her know that there are services out there like through a regional center or different services within our reach. So basically it's through education and motivation...And that works for some and not for others. So, basically, letting them know that the aid is not forever and to do the best that they can and take advantage of the program.

This GSW describes her struggle to avoid using sanctions to achieve compliance. Maintaining a contact with the participant is key.

I don't even try to even mention the noncompliance if they are at least coming in and doing what they are trying to do...One lady got a D and an F in a class, and I could see that she started dropping out...Maybe I should start freaking out because he or she is not coming in. Then I might do it, the compliance process. So there are some dynamics there that we have to take as a GAIN worker. “If you are going to try and make it, give me a call. If it's because you are working, let me know.”

These GSWs searched for signs that the participant will benefit from the program—even minimal participation will sometimes do—and when this GSW finds one, she applies the rules flexibly to encourage the participant's involvement.

...the PTs that really show up for appointments are trying their best to keep going... I have a PT who already went to the Job Club during the winter, and now she is going in the summer season, and she is asking for money to buy clothes again. It sounds reasonable to me. Of course, they really want more money. But if I ensure a little bit more money and could keep that participant going to the Job Club, I may have the chance of having her get a job eventually. So I would rather take that risk. ...and I have the expectation that she might get a job. So that's my target... I will continue to encourage them... and make that participant feel that she has achieved something, and she is on her way to getting a better life. Those who don't show up, I can't do anything.

The one obstacle they could not overcome, the one that made them feel that the participants were beyond their help, was participants' failure to come in. This GSW admits that there are some participants who do not want her help.

A lot of PTs come in, and they say they didn't know they had to stay for an Orientation... The main point is that they come in. The ones that do come in we can help them. If they can't participate because of a medical excuse, or they are taking care of someone else, we can do something for them. It's just the ones that don't come in, and when they don't come in, that's when they go to the noncompliance and eventually get sanctioned. But I think here we want to find a way to prevent a sanction. I think we are doing enough. I think we are doing what we can. It's just the PTs, some are just not willing to participate.

While the intent of sanctions policy is to encourage involvement in GAIN, focus group findings reveal that, in practice, GSWs view and employ sanctions in very different, and unintended, ways. Those who strictly enforce sanctions felt that many participants were beyond help, and sanctions enabled them to clear their caseloads to focus on those who were most likely to benefit. In contrast, those who were reluctant to employ sanctions felt that participants could be helped to overcome barriers to participation in the program. Precisely because they were dealing with the hardest cases, helping them required going out of their way to make the most of opportunities to encourage, educate, and motivate. In the view of these GSWs, sanctions robbed them of those opportunities. Whether GSWs use a strict or more lenient application of sanction rules, the results no doubt will have some effect on the rate of sanctions and curing.

The Effect of the Work Situation on Casework

GSWs try hard to get eligible parents involved in GAIN and to assure their compliance with its regulations. However, their efforts can be affected by their work situations: heavy workloads, inability to contact participants and fully investigate their cases, lack of forms in languages other than English, and problems created by two different, but related, computer systems (LEADER and GEARS), and two divisions (CalWORKs and GAIN) of one welfare system with components that don't always communicate very well with each other. Consequently, some participants fall between the cracks. What follows are narratives from GSWs about systemic barriers that affect their compliance work and compliance actions of participants.

Time Spent on New Programs Cuts Time to Spend on Casework

Caseworkers, especially regular, as opposed to specialized, GSWs who had fewer cases, complained about a contradiction in their workload: their time dealing with a growing number of new programs and services hampered their ability to spend time on the compliance issues of participants.

GSW 1: The sad part about it is that every week it just seems we are getting new programs and new services that we have to offer. But yet, we don't have enough personnel to accommodate for all these new things. It really does create

a backlog, and that cuts into you trying to call your participants on compliance issues, returning phone calls. If you are gone over the weekend, you can come back on Monday, and you have something like 10-15 messages, and you are still dealing with the messages that are coming in that day, plus the participants that are coming that day. It creates a huge backlog of trying to get back to people in a timely fashion, trying to resolve compliance issues. It just overwhelms you.

GSW 2: L.A. County has new programs, 2-3 a week.

Under-funding the Spanish Language Orientation

GSWs complained that too few resources were devoted to bilingual caseworkers and to Spanish language letters, forms, and other materials. In one of the smaller Regional Offices, the result was confusion about regulations, an increase in the workload of Spanish-speaking GSWs, and less time for dealing with compliance problems.

Now me, in the Spanish-speaking unit, because of funding, we only have Orientation for Spanish-speaking participants on Thursday. I get eight people that I have to see new appointments on Thursday plus any noncompliance. My average appointment is 12-14 appointments, all for 8:00 am, and I have to see them all before 9:00 am because Orientation starts at 9:00 am. Now depending on how much they want to talk and not listen, it's really hard to give all that information, screen them correctly, and give them the quality of information that they should be getting. The English-speaking workers have intake everyday. I think it's easier that way because you get more time to spend with the participants. But that also impacts them, any new program, anything new that comes up, we have to do it before Orientation. So the initial contact, which is in the morning, and that's basically impossible. So we do what we can, and sometimes we forget something or...it's very difficult.

The result was also a lack of information for participants about the program and more time taken from casework to translate and explain services and requirements.

The initial appointment only goes out in English.²⁹ Now a lot of times they will call, "This letter is in English, I don't understand. Can you explain?" I will explain. Some don't come in. Maybe that's the reason because they don't understand, so they just figure, "I don't need to be there." I'm not really sure. We always have the problem that not all forms are available in Spanish. So that takes an additional half hour to explain to the participant what they are signing. They always have questions. Now you are reading it, and you are translating it. So it just adds more time.

Problems of Poor Communication Systems and Coordinating LEADER and GEARS

In 1998, GAIN Services Workers had their own computer system, GEARS, for their actions, and it gave them a great deal of autonomy in dealing with compliance issues. In 2002, in addition to GEARS, GSWs had to contend with conversion to a new information program called LEADER. According to many caseworkers in the focus

groups, the new program was poorly coordinated with GAIN. As one put it, "We have two different software programs, and they do not talk very well to each other." The result was a rise in compliance problems and sanctions caused by poor computer interface.

A GSW with a specialty in information systems explained the situation:

I get all the problems that deal with the compliance and LEADER interface problems... The compliance problems between the interface of LEADER that occur usually end up on my desk...LEADER is the eligibility software written to define eligibility for the participants who are receiving public aid. GEARS is the software application program which is under the GAIN program. Because of the conversion process, they are going through different phases, and implementing the new regulations often creates a lot of problems in the interface of these two systems, which causes most of our compliance problems... I can say probably 40-50 percent of the problems are related to the system of not talking properly together and the flawed information in the system...

Outdated phone and address information can hinder contacts and verification of compliance. The telephone numbers of poor participants are often disconnected or changed. When caseworkers get new numbers, they put them into the LEADER system. The information is often not updated promptly with the result that caseworkers get outdated information and fail to reach their cases.

It so happens that participants change phone numbers so often that it's so hard to get a hold of them. Sometimes it's very frustrating...the participant is working, and you are waiting for the verification and then you call, and the phone has been disconnected. If there was a way that we could have the information updated more often, that would be good for contact purposes.

If LEADER does not update addresses, participants do not get notified.

If the participant changes their address, we are putting the change of address in the computer, in the GEARS system... After five days, GEARS automatically sends the new address to the district. But they didn't do their work on time...and we have the old address because LEADER was not updated. The problem is we are sending letters, we are calling them and we have the old address because LEADER did not update the change of address...

Much of the employment and other information that caseworkers need to investigate compliance problems is in LEADER. However, GSWs have limited access to LEADER. One result is sanctioning participants because of lack of verifiable information.

In order for you to get clearance, to get a password to look into the eligibility system, it's really hard. And even if you have that, we don't have access to all of the screens...the only screen that we can really look at is to see if they [participants] have employment. But we can't go one step deeper to see when was the last time they reported employment, how much they reported and how many hours they reported... So we are caught behind a bind [because] we have

30 days to put them in [the information]. They don't tell you whether or not they are working. We can't verify it. It's really tough to work with different services because there is so much bureaucracy. You are not connected or communicating.

Getting accurate computer information means fewer sanctions.

I used to have access to LEADER. I don't anymore...But when I did have access, my employments went up, which meant fewer sanctions because I had access. If they didn't come to the appointment that day, I'll go check downstairs in the computer and see if they maybe reported some income. If they did, then I know they are probably working, and I'll follow up with that...[Now] I really have to get more on the case of the participants and let them know that you need to provide that to me...because I can't verify it through the computer anymore.

Lack of LEADER Computers

The GEARS and LEADER software are so incompatible that they require separate computers. In some District Offices, some fortunate caseworkers have two computers for their use, but in the smaller Regional GAIN Offices, personnel are forever competing for the few LEADER computers. Not only does this lead to a lack of verifiable information but also to an inflated rate of noncompliance and sanctions.

And just because I have access to LEADER, for example, it doesn't mean that whenever I need it, that it's going to be available. We have two LEADER computers in this office, right? So it's bottlenecked. For example, I have five minutes of free time. If I want to get a printout, I go down to use the computer, and there is someone on it. So now, those five minutes that I had time for are gone because now, I have an appointment coming in at 9:30 am. So that appointment comes in, and I don't know when I'm going to have time to go to the LEADER computer again... I'm competing with other workers that have access to it. We're competing with clerks that are doing the verification of employment, and we're competing with people who are doing the time limits. We are competing with everyone to use two machines in the whole building.

Contacting Eligibility Workers for information is no solution. If GSWs need confirming information, for example, on employment when investigating participant compliance, they can always try to call CalWORKs Eligibility Workers. However, they are also very busy with large caseloads and little time for phone calls.

System Errors Affect Sanction Actions and Misinform Participants About Noncompliance Procedures

LEADER can delay GAIN sanction requests. In the following case, the GSW sends a sanction order to LEADER, which then is supposed to generate a Notice of Action to the participant to contact the GSW and come to compliance within 20 days or get sanctioned. However, the notification and sanction are delayed because the case, for some reason, is inactive in LEADER.

...if a participant was not eligible for that time because of some eligibility issue on the CalWORKs side, whatever transaction is requested from GEARS, stays in a queue because the case is inactive until this case becomes active back again,...the PT stays in noncompliance a longer time...even the GSW can't see her or him anymore because the case gets passed through another step and is probably still waiting to get a sanction start date so it can be assigned again back to an active file so that worker can prove the sanction and take care of the sanction.

Because of delays between GAIN requests and LEADER responses, Notices of Action go out at wrong times to the confusion of GSWs and participants.

They are also misinformed with the Notice of Action. Because of the delay, they are told that they are being recommended for a sanction is way off-base because of the delay between the two systems. Whereas our system may say they'll be sanctioned effective the end of this month, because of the delay, it can take like 2-3 months before it actually happens. So they are misinformed. Sometimes the Notice of Action will say, "You need to respond to your caseworker," say for example, "in the next two weeks." I don't have that information because we are dealing with two different systems that they don't talk well with each other right now...We are working behind LEADER. All of the Notice of Actions, they go out wrong. They tell them to come see me on this date when I have no knowledge of that because I've already recommended her for a sanction as far as I'm concerned.

Lack of Information About GAIN at CalWORKs Increases GAIN Sanctions

A lack of coordination between CalWORKs and GAIN counseling can increase the rate of sanctions in GAIN. The separation between LEADER and GEARS is symbolic of the division between the two central parts of the County of Los Angeles welfare system, CalWORKs and GAIN. GAIN participants have to deal with the former for their eligibility for aid and the later for their compliance with the work requirements for aid. Unfortunately, parents at their first contact with the welfare system (CalWORKs) often do not get enough counseling to understand the importance of GAIN for their lives. With high caseloads, Eligibility Workers simply do not have the time to explain that attending GAIN and fulfilling its work requirements are conditions for receiving aid. The consequence is a lack of information and failure to attend GAIN Orientation, the GAIN activity with the highest rates of sanctions. A GSW who has been in GAIN since 1998 explains the problem:

Our biggest problem is making that initial contact, trying to get them to come in for their very first appointment (GAIN Orientation)...If we have not established that first contact, they will never get to the community services, the self-initiated program or vocational program...I think it (the initial contact) really starts through the CalWORKs. If at that very beginning, some kind of contract could be established with them and understanding that yes, we are helping you with this aid. We are going to give you the cash benefits... I hate to say this, but it's [the misinformed reaction] sort of like, "take the money and run." It's sort of like

that way of thinking sometimes. But if we establish from the very beginning, maybe with a contract or something, “You’re going to also be receiving a letter stating that you will be required to participate in GAIN in order to continue receiving your portion of the adult benefit,” it will make a big difference.

When we switched to LEADER, all that stopped. Prior to LEADER, we had that system in place... When we made that initial contact from the very beginning in CalWORKs, making them understand, “Yes, your case is pending once it’s approved.” We went through, and we explained, “Okay, you are going to be approved. You are going to receive your cash benefits, Medi-Cal, Food Stamps,...but you will also be required to participate in the GAIN process to continue to receive your benefits.” When we switched over to this new system, a lot of that got lost. If you don’t make that first contact and establish a rapport and make them really understand that this is a requirement, we’ve lost them already. We lost them.

In the focus group, this GSW’s statement was greeted with nods of agreement. GSWs think that many parents don’t understand the purpose of GAIN and why they must attend Orientation or lose some of their cash aid. They believe that this may be a major reason for low participation rates and sanctions at the GAIN Orientation.

Conclusion

As stated in the Introduction to this chapter, the observations made by GSWs in two focus groups cannot be generalized to GSWs as a whole. However, some of the concerns expressed in their discussions converged with findings in the GSW survey and participant focus groups. For example, participants experienced the flexibility that GSWs had in applying sanctions and appreciated the approach of those who attempted to understand their situations and apply sanctions flexibly. They felt that this approach encouraged a more positive attitude toward the GAIN program and encouraged compliance with its requirements. Both GSWs and participants also identified some of the same communication and administrative barriers to compliance, albeit from different perspectives. Participants knew that they sometimes got their noncompliance and appointment letters late or had difficulty reaching their caseworkers. GSWs, with their knowledge of how things happen in the workplace, knew that some of these complaints could be attributed to problems in the interface of GEARS and LEADER and heavy caseloads. Similarly, some participants, not fully understanding the importance of attending Orientation, were surprised to find that they were sanctioned for not attending. From their perspective, some GSWs in the focus groups argued that to reduce sanctions, participants needed more information about the work requirement of welfare before Orientation. The actual recommendations made by GSWs can be found in Appendix D. Focus group findings that converge with those of the GSW survey are noted in the concluding chapter of this report.

CHAPTER VIII

Conclusions and Next Steps

The Complementary Relationship Between Quantitative and Qualitative Analysis

The findings presented in this study are particularly valuable insofar as they come from analyses of three different sources of data and are the product of distinct but complementary modalities of social research. The sanctioned population is often dynamic with changing program status and the sanctions process can be quite complex. The task of capturing the interaction between the two requires nothing less than a multi-pronged and internally reinforcing analytical approach. The research conducted for this report has deployed such an approach in an effort to produce reliable results.

Quantitative statistical techniques have been utilized for the analysis of administrative records and a staff survey. This mode of analysis provides the reader with answers to large-scale questions about the sanctioned population considered as a whole. For instance, the quantitative methods utilized here have enabled this report to accomplish the basic but nevertheless essential goal of identifying who sanctioned participants tend to be—i.e., what does the sanctioned population look like in terms of its demographic and background characteristics? In addition, results generated through statistical methods enable the reader to gain a certain amount of familiarity with issues such as the factors associated with being sanctioned and with returning to compliance.

However, quantitative methods are unable to provide much insight into the way in which the sanctions process is experienced in subjective terms, both by participants who have sanctions imposed on their cash grants, and by the GAIN workers responsible for managing their cases. For this type of experiential data—that is, data which offers a view into the day-to-day human element of the sanctions process—this report has relied on analyses of focus group interviews conducted with both GAIN participants and GSWs. The focus group interviews are especially valuable because they alert the reader to the reality that, underneath the anonymous numbers, rules and procedures discussed in the statistical chapters, there are human beings living their lives and struggling with numerous responsibilities, some of which come into conflict with each other. The focus group interviews provide an understanding of how participant perceptions shape decisions to comply or not comply with program requirements. Likewise, they provide an understanding of how the perceptions and experiences of GSWs with participants and the sanction process shape their efforts to achieve participants' compliance with GAIN regulations.

Just as the statistical methods deployed in this report have analytical limitations, so too do the focus group interviews. The results of focus group research are generated from subjective perceptions as expressed in everyday language. The results of these interviews, therefore, cannot independently be generalized to the sanctioned or GSW populations as a whole. However, these results have been linked with the quantitative analyses that have been conducted for this report, and in so doing, both the quantitative

and qualitative dimensions of the process and populations emerge. Moreover, focus group interviews point to issues that might otherwise remain hidden, thereby providing valuable parts of the roadmap for further research and investigation in the future.

The strength of the multi-pronged analytical strategy deployed in this report is that where one mode of analysis is limited, the other is strong, and vice versa. Each mode is used in a way that complements the other so that the report as a whole offers a powerful balance of quantitative and qualitative information on the sanctions process. The policy recommendations introduced in this chapter emerge out of this balanced approach. This report's findings are summarized in the executive summary and at the conclusion of each chapter. The recommendations that follow have been made on the basis of the findings that are most relevant in terms of sanctions and compliance policies.

Policy Recommendations

- ✓ **Intervention to reduce sanctions and noncompliance should be made in the initial stages of the Welfare-to-Work process towards completing Orientation and the Appraisal of participants.**

The most important issue associated with being sanctioned or entering noncompliance was the completion of Orientation. The majority of sanctioned participants in the study population (57 percent) were sanctioned when they did not show up for their Appraisal appointment. This indicates that participants often become noncompliant or sanctioned before participating in Welfare-to-Work activities. Never-sanctioned participants who did not leave the program had the highest rate of completing Orientation (92.1) percent. These findings suggest that sanctions could be reduced if additional efforts to explain and secure compliance were made in the initial stages of the Welfare-to-Work process, before and during the Appraisal and Orientation of participants. GSWs participating in focus group interviews for this report underscore this point, indicating that one way to reduce sanctions and increase compliance would be to provide GAIN participants with more information about work, program requirements, and services (including specialized supportive services) when they first become eligible for aid before Orientation.

- ✓ **Sanctions are likely to be reduced further with additional measures taken to increase participants' involvement in supportive services such as child care and transportation, as well as in program activities such as Job Club, Self-Initiated Programs (SIPs) and training after Job Club and Assessment.**

Participants in the study population who completed Job Club, or enrolled in SIPs, as well as those who received training after Job Club and Assessment, had a significantly lower probability of being sanctioned. Among never-sanctioned participants the rate of Job Club completion was twice as high as it was for sanctioned participants. The never-sanctioned group also had significantly higher rates of participation in supportive services and training activities.

One of the reasons the discussions of program participation provided in this study are particularly important is that this participation is low. This finding, combined with what has been shown in terms of the beneficial effects of participation, implies that additional measures taken to involve participants in child care, Job Club, training, transportation aid and SIPs would further help to reduce sanction rate. The survey results produced for this study bear this implication out further in showing that providing additional information to participants before issuing a Notice of Action is associated with fewer sanctions. Findings from focus group interviews conducted with participants also suggest this.

- ✓ **Measures taken to affect a general reduction in the caseload size per caseworker might lead to a decline in sanctions.**

Results from the staff survey conducted for this report indicate that larger caseloads are associated with higher sanction rates. This should be considered in connection with focus group findings suggesting that heavy workloads can make it difficult for GSWs to take all the measures necessary to assure that participants have what they need to comply with Welfare-to-Work requirements. This implies that a reduction in caseload per GAIN employee—which would occur if more staff were added—could bolster the ability GAIN employees have to enhance the capacity participants have to follow program regulations. Smaller caseloads might also address the common complaint mentioned in participant focus groups regarding the difficulty often involved in reaching GSWs by phone.

- ✓ **GSWs should be encouraged to explain compliance policy to participants in one-on-one interviews instead of—or in addition to—explaining this policy in Orientation meetings.**

Staff survey results indicate that explaining policy in group interviews as opposed to one-on-one interviews is associated with more sanctions. Explaining compliance policy in one-on-one interviews appears to be a more effective means of conveying program rules than explaining compliance policy at group Orientation meetings. This finding should be considered against the backdrop of some issues that emerged in the focus group interviews with sanctioned GAIN participants. Many focus group participants seemed to lack an adequate understanding of program rules and regulations, the sanctions process, and terms like “notice of action”, “good cause”, “appeals hearings”, and “cure”. Their statements suggested that there may have been a problem of information overload, combined with too few people to explain what the information meant. The complexities of the sanctions and compliance processes can often get lost in an anonymous Orientation meeting, particularly for a parent attempting to grapple with numerous responsibilities all at once. One-on-one interviews in which participants have more individualized attention appear to be a more effective way of conveying rules and policies. In addition, one-on-one interviews provide an additional way for GSWs to build a rapport with GAIN participants. Participant and GSW focus group interviews suggest early and sustained rapport is key to compliance.

- ✓ **Measures taken to foster better coordination between the CalWORKs and GAIN divisions within DPSS would likely smooth some of the communications problems between GAIN offices and GAIN participants and, in turn, lead to a reduction in sanctions.**

This study shows that most sanctioned participants are sanctioned before participating in a GAIN activity. Both survey and focus group results suggest that one of the main reasons for this is that participants either do not receive official notices at all, or they receive them too late to comply with the procedures they are asked to follow. Indeed, receiving late appointment letters is one of the most common reasons staff survey respondents gave for why GAIN participants miss Orientation.

There can be any number of reasons participants do not receive appointment letters in a timely fashion. What likely often occurs is that participants move without informing DPSS, with the result that notices are sent to an old address. If these notices are then forwarded, there is a good chance that participants will not receive them in time to comply with what is asked of them. But even in the event that participants provide DPSS with the new address, there is no guarantee that appointment letters will be sent to the proper place. One reason for this is that the CalWORKs and GAIN divisions within DPSS are separate, and there is evidence to suggest that these two divisions are not coordinated as effectively as they should be.

Nowhere are the coordination difficulties between CalWORKs and GAIN more clear than in the lack of interface between the LEADER and GEARS computer systems. While LEADER is the system for CalWORKs, GEARS is the system for GAIN. Because the two systems do not communicate with each other, a change in information made in one (a change of address, for example) is not automatically reflected in the other. In order for the change to be made in both systems, it must be made in each separately. Focus group interviews conducted with GSWs indicate that GSWs lack adequate access to LEADER computers. This means that making appropriate information changes in both LEADER and GEARS often requires that participants undertake the potentially confusing task of contacting personnel from CalWORKs and GAIN separately. In addition, focus group interviews suggest that confusion and frustration are further aggravated at times because there is no easy way for participants to provide updated information to GSWs or to contact them about administrative problems or errors that have been made. This can lead to time delays in processing information, thereby increasing the likelihood of sanctions.

The lack of coordination between the two computer systems is one of the reasons participants are sometimes late in receiving appointment letters (or do not receive them at all), and it is one of the reasons participants either have difficulty complying with regulations or get sanctioned in error. Compliance might be increased and sanctions decreased if measures are taken to enable GEARS and LEADER to communicate with each other.

The Next Report

In addition to the data sources examined for this report, Part II will present findings from a survey conducted with sanctioned GAIN participants. The next report will generally focus on the effect sanctions have on the lives of GAIN participants, especially in the areas of employment and earnings. The report will also further explore factors associated with participants' noncompliance and return to compliance, as well as the economic consequences of sanctions on participants' families and their children.

APPENDIX A

Employee Survey on Sanctions

1. Job Title: _____

2. GAIN Region:	Region	(%)
	1	14.3
	2 (ACS)	1.8
	3	21.0
	4	20.6
	5	18.2
	6	14.1
	7 (MAXIMUS)	2.9
	RITE	7.1

3. Office location: _____

4. Please indicate your current position with the appropriate agency:

		(%)		(%)
DPSS	GSW	88.2	Supervisor	11.8
ACS	GCM	NA	Supervisor	NA
MAXIMUS	GCM	NA	Supervisor	NA
RITE	Case Manager	NA	Supervisor	NA

5. How many GAIN participants are currently assigned to you?

	(%)		(%)
1 – 50	4.8	151 – 175	4.8
51 – 75	8.7	176 – 200	2.9
76 – 100	27.9	201 – 225	0.2
101 – 125	17.4	More than 225	1.2
126 – 150	8.1	Not Applicable	24.0

6. For how many years have you worked at your current level?

	(%)
Less than 6 months	1.4
6 months to 1 year	0.6
1 - 2 years	4.4
3 - 4 years	46.6
5 years or more	47.0

7. How many years have you worked providing services with the following organizations?
(Choose all that apply)

	DPSS (%)	ACS (%)	MAXIMUS (%)	RITE (%)
Less than 6 months	0	NA	10.8	NA
6 months to 1 year	0.2	NA	2.7	NA
1-2 years	0.7	NA	21.6	NA
3-4 years	15.8	NA	48.6	NA
5 or more years	83.3	NA	16.3	NA

8. What is the highest educational level you have completed?

	(%)
Less than High School	0
High School / GED	1.2
Some College	13.7
College Degree	72.3
Graduate School	12.8

9. In which of the following languages do you speak with the GAIN participants?

Language	(%)
English	80.6
Spanish	25.6
Cambodian	NA
Chinese/Mandarin/Cantonese	NA
Armenian	NA
Vietnamese	NA
Russian	NA
Other	NA
Not Applicable	NA

10. Please indicate your level of fluency in the following languages if you speak to GAIN participants in a language other than English. (Fill in all that apply)

	Fair (%)	Good (%)	Very Good (%)	Fluent (%)
Armenian	NA	NA	NA	NA
Cambodian	NA	NA	NA	NA
Chinese/Mandarin/Cantonese	NA	NA	NA	NA
Russian	NA	NA	NA	NA
Spanish	6.3	5.6	3.5	NA
Vietnamese	NA	NA	NA	93.3
Other language	—	—	—	—

THE FOLLOWING QUESTIONS PERTAIN TO THE SANCTION PROCESS.

Please answer each question to the best of your ability. Some of the questions may be geared towards the ACS, MAXIMUS and RITE employees. If a question does not apply to you or to your situation, and the NA/Not Applicable option is not supplied, please leave the choice or question blank.

11. At which of the following stages do you inform the GAIN participants that they will be sanctioned if they fail to meet GAIN program requirements?

	(%)
Orientation	47.8
Assessment/Appraisal	25.6
Job Club	NA
Welfare-to-Work Plan	22.2
Compliance Interview	31.5

12. Which of the following methods do you use to explain the compliance process to the GAIN participant? (Choose all that apply)

	(%)
Explain compliance process by phone	53.5
Explain during Orientation at group session	16.4
Explain during one-on-one interview	73.5
Send a notice by mail	38.1
Provide written copy of process	NA
Other notification or action	NA

If you answered "Other", please specify what notifications or actions: _____

13. In your opinion, how frequently do participants fail to show up for Orientation because: (Choose one for each question)

	Always (%)	Frequently (%)	Sometimes (%)	Never (%)
They had transportation problems	3.8	25.3	66.9	4.0
They needed child care	12.4	46.2	39.1	2.3
Participant did not understand that they had to show up for the appointment	3.4	20.6	55.4	20.6
A parent or spouse would not allow them to come	0.7	2.0	24.0	73.3
They did not receive notification	7.5	25.3	60.6	6.6
They did not receive notification in time to make it to the appointment	5.5	27.9	60.5	6.1
They were employed and could not leave work	5.7	28.0	64.8	1.5

	Always (%)	Frequently (%)	Sometimes (%)	Never (%)
The participant was ill	4.0	26.8	67.9	1.3

Other reason(s) you believe participants fail to show up for Orientation: _____

14. Based on your experience, how often do the following reasons contribute to GAIN participants becoming noncompliant? (Choose one for each question)

	Always (%)	Frequently (%)	Sometimes (%)	Never (%)
They did not show up for Orientation	19.3	61.3	18.0	1.4
They were unaware of program requirements	3.5	20.8	62.6	13.1
They did not understand the compliance process	3.6	21.1	64.3	11.0
They needed child care	9.3	31.5	52.9	6.3
They had transportation problems	4.6	21.6	66.4	7.4
They needed supportive services such as mental health (MH), substance abuse (SA) and/or domestic violence services (DV)	0.6	8.4	71.5	19.5
They needed their compliance plan amended	1.6	5.6	52.9	39.9
Participant claimed good cause, but did not provide adequate proof or documentation	6.2	45.0	46.4	2.4
The participant was a victim of domestic violence	0.2	4.0	69.8	26.0
They failed to show up for appointment(s)	31.1	52.3	16.5	0
Participant did not receive notification of an appointment in time to get to the appointment	2.2	21.5	67.8	8.5
Participant could not contact GSW By phone	1.3	9.6	57.4	31.7

Other (*specify*): _____

15. How frequently do you encounter the following difficulties and/or barriers to helping the GAIN participant back into compliance? (Choose one for each reason)

	Always (%)	Frequently (%)	Sometimes (%)	Never (%)
Participant changed address	6.6	27.9	62.5	3.0
Participant's phone has been disconnected	15.5	55.6	28.3	0.6
Other (<i>specify</i>): _____				

16. Before issuing a Notice of Action, (NA816, NA817, NA818) how frequently do you take the following steps to help the participant get back into compliance? (Choose one for each reason)

	Always (%)	Frequently (%)	Sometimes (%)	Never (%)
Try and determine if participant's contact information is correct and current	62.7	27.7	8.2	1.4
Inform the participant why or how they are out of compliance	66.6	25.1	7.8	0.5
Help the participant understand their right to provide good cause to avoid being sanctioned	73.2	21.6	4.7	0.5
Try and determine if there is good cause for noncompliance	71.9	21.8	5.6	0.7
Provide assistance with needed documentation for good cause	61.0	26.1	11.3	1.6
Determine an appropriate compliance plan with the participant	55.6	29.2	14.1	1.1
Provide the participant with referrals for assistance with the compliance process so they can provide documentation	49.6	28.7	17.2	4.5
Give the participant information on how to contact GSW by telephone to discuss the good cause process	70.1	19.7	9.7	0.5
Provide information on child care so the participant can attend the good cause interview	70.1	20.8	7.9	1.2
Provide information on transportation assistance so the participant can attend the good cause interview	70.0	20.4	8.5	1.1

	Always (%)	Frequently (%)	Sometimes (%)	Never (%)
Probe for language or other barriers	52.0	23.0	19.6	5.4
Provide information on how to appeal a decision	56.7	23.0	19.1	1.2
Other (<i>specify</i>): _____				

17. In your opinion, how well do the GAIN participants understand that noncompliance with GAIN activities can result in a reduction of their cash grant? (Choose one only) (%)

Very well	To some extent	Not very well	Not at all
60.0	30.7	9.0	0.3

18. How frequently do participants FAIL to: (Choose only one per choice)

	Always (%)	Frequently (%)	Sometimes (%)	Never (%)
Show up for Orientation	9.5	74.2	16.1	0.2
Show up for Assessment	2.0	39.2	58.2	0.6
Respond to phone calls	4.9	47.6	46.4	1.1
Respond to Notice of Actions	7.7	46.3	44.6	1.4
Show up for appointments	7.6	61.6	30.6	0.2

19. In your experience, how frequently do the following issues account for the GAIN participant's lack of understanding about the compliance policy? (Choose one only for each reason)

	Always (%)	Frequently (%)	Sometimes (%)	Never (%)
Participant has language barriers	2.4	9.5	55.7	32.4
The participant cannot read or write adequately	2.5	13.2	64.3	20.0
The GSW does not speak the participant's language	1.1	3.6	36.2	59.1
The notification(s) were not in a language the participant could understand	3.6	8.9	48.4	39.1
Participant was not aware of the program rules	2.6	19.2	62.5	15.7
The participant believes he/she is in compliance	3.0	23.5	60.5	13.0
They did not attend Orientation	12.6	50.2	33.7	3.5

	Always (%)	Frequently (%)	Sometimes (%)	Never (%)
The participant needs supportive services such as MH, SA and/or DV	1.3	13.8	73.9	11.0

Other (specify): _____

20. When documenting good cause for a participant's noncompliance, do you accept written or verbal documentation, or both? (Choose one) (%)

Verbal only	Written only	Both	Not Applicable
0.6	26.2	67.4	5.8

21. How often do you accept a participant's counterproposal to the compliance plan? (%)

Always	Frequently	Sometimes	Never	Not Applicable
5.7	15.3	48.1	7.3	23.6

22. Do you ever cancel a noncompliance determination after it is initiated? (%)

Yes	No	Not Applicable
82.3	5.4	12.3

23. How often have you canceled a noncompliance determination after it was initiated in the past 6 months? (%)

Very often	Often	Sometimes
7.8	14.7	29.1
Rarely	Never	Not Applicable
25.3	5.4	17.7

24. Based on your experience, how often do the following reasons contribute to participants being sanctioned? (Choose one only for each reason)

	Always (%)	Frequently (%)	Sometimes (%)	Never (%)
The participant did not attend Orientation	19.3	53.2	26.1	1.4
They did not show up for Job Club	9.6	56.6	33.0	0.8
They did not show up for Assessment	4.6	30.0	62.1	3.3
They did not complete Job Club	6.9	53.2	38.2	1.7
They did not enter a Welfare-to-Work plan	7.1	38.3	50.0	4.6
Proof of medical exemption was not provided	6.6	35.9	55.6	1.9

	Always (%)	Frequently (%)	Sometimes (%)	Never (%)
The participant failed to progress or complete an assigned activity	10.2	37.9	50.6	1.3
They did not comply with a program component that was agreed to in the Welfare-to-Work plan	7.2	28.1	60.8	3.9
The participant was not aware that he/she was not in compliance	1.0	12.8	66.7	19.5
Participant refused to accept a job without a good reason	3.4	10.7	55.2	30.7
Participant terminated employment without a good cause	2.8	8.7	61.4	27.1
They could not be reached for a cause determination interview	7.6	38.6	49.5	4.3
The participant would not agree to a compliance plan	2.7	11.5	60.0	25.8
Participant did not follow compliance plan	5.0	31.1	59.5	4.4
They did not show up for State Fair Hearing	1.6	6.0	53.0	39.4
A parent or spouse would not allow them to participate in Welfare-to-Work activities	0.5	1.7	31.7	66.1
The sanction was issued in error	0.4	4.4	69.1	26.1
Participant did not respond to a request in time	7.6	31.8	54.1	6.5
The participant did not understand the program requirements	2.0	16.3	63.4	18.3

25. Do you think GAIN participants are sometimes sanctioned in error? (%)

Yes	No	Don't know/Not sure
67.7	13.4	18.9

26. How frequently do you feel sanctions are issued in error due to: (Choose one only for each choice)

	Always (%)	Frequently (%)	Sometimes (%)	Never (%)
The GSW could not reach the Eligibility Worker	4.5	15.4	49.1	31.0

	Always (%)	Frequently (%)	Sometimes (%)	Never (%)
There was an error in the data entry	1.1	11.1	66.7	21.1
Documentation for good cause was received after the 20th calendar day	7.4	31.8	55.0	5.8
Appointment letter arrived too late or after the date of appointment	3.3	17.6	62.7	16.4
Sanction due to problems with GEARS system	2.2	9.9	62.7	25.2
Participant was terminated from the LEADER system by mistake	2.0	12.4	60.4	25.2

27. In the past year, how many of your sanctioned caseload had their sanctions lifted or cured? (Please choose one only)

	(%)
None	1.7
Less than 10	22.1
11-20	13.2
21-30	7.0
31-40	3.4
41-50	3.0
51-60	1.9
61-70	0.8
71-80	1.1
81-90	0.2
91-100	0.6
More than 100	3.2
Don't Know	19.1
Not Applicable	22.7

28. How frequently do sanctioned participants get "cured" for the following reasons: (Please choose only one for each reason)

	Always (%)	Frequently (%)	Sometimes (%)	Never (%)
The participant now understands the program requirements	10.7	34.0	41.7	13.6
They received a reduced CalWORKs grant, and as a result, are now willing to participate in program requirements	38.2	43.9	15.7	2.2
They went to Job Club	11.1	37.3	45.0	6.6
They showed up for Assessment appointment	11.1	30.2	51.3	7.4
They completed Job Club	12.6	35.8	43.8	7.8

	Always (%)	Frequently (%)	Sometimes (%)	Never (%)
Participant went to Appraisal appointment	19.7	44.9	31.5	3.9
Participant complied with program component that was agreed to in the Welfare-to-Work plan	21.5	38.0	36.9	3.6
The participant provided proof for Good Cause	21.0	41.2	35.8	2.0
The participant now understands the benefits of participation in program requirements	15.8	40.5	36.9	6.8
They enrolled in the agreed to education or training programs	15.5	34.3	45.5	4.7
They went to their State Fair Hearing and were reinstated	8.2	11.8	65.9	14.1

29. In the past year, how many of your GAIN sanctions were rescinded because it was discovered that a substance abuse / mental health / domestic violence need contributed to the noncompliance?

	(%)
None	25.5
Less than 10	24.2
11-20	5.3
21-30	1.2
31-40	1.0
41-50	0.2
51-60	0.4
61-70	0.2
71-80	0
81-90	0.2
91-100	0
More than 100	0.4
Don't know	20.4
Not Applicable	21.0

30. Once the participant has cured the sanction and is in compliance, how quickly is the sanction lifted and their cash payment restored? (Please choose one only)

	(%)
Same day	2.9
Within a week	34.4
Within the month	31.3
1-2 months	8.4
2-3 months	1.6
More than 3 months	0.2
Don't know	21.2

31. In your opinion, how frequently are sanctioned participants: (Please choose only one for each choice)

	Always (%)	Frequently (%)	Sometimes (%)	Never (%)
Evicted from their home	1.8	7.1	66.3	24.8
Experiencing food shortages	1.6	7.0	51.9	39.5
Experiencing domestic violence	0.4	6.9	64.3	28.4
Need substance abuse treatment	0.9	6.7	67.0	25.4
Suffering from mental illness, such as depression	1.3	10.5	68.9	19.3
Sanctioned in error	0.9	4.9	79.4	14.8
Terminated in error	0.9	4.6	76.4	18.1

32. What is the total number of participants in your caseload you sanctioned, or recommended that they be sanctioned, during the past 6 months? (Please choose one choice only)

	(%)
None	6.0
1-10	22.4
11-20	11.6
21-30	7.2
More than 31	15.9
Not Applicable	23.4
Don't know	13.5

33. How many participants in your caseload have you sanctioned or recommended they be sanctioned during the past 6 months because: (Please choose only one for each choice)

The participant failed to provide sufficient documentation for good cause.

	(%)
None	13.5
1-10	36.3
11-20	8.5
21-30	2.5
More than 30	6.1
Not Applicable	22.6
Don't know	10.5

a) They would not agree to a compliance plan. b) They did not show up for appointments

	(%)	(%)
None	30.5	4.7
1-10	27.6	28.1
11-20	3.9	12.6
21-30	1.8	8.6
More than 30	1.1	11.3
Don't know	10.7	9.2
Not Applicable	24.4	25.5

34. In the past 6 months, have any of the sanctioned participants in your caseload appealed their sanction? (Please fill in one circle)

	(%)
Yes	15.9
No	36.2
Don't know	19.9
Not Applicable	28.0

35. If yes, how many have requested the following? (Please choose only one for each choice)

	Fair Hearing (%)	Third party assessment (%)
1-5	91.6	NA
6-10	5.6	NA
11-15	1.9	NA
16-20	0.9	NA
21-25	0	NA
More than 25	0	NA

36. What recommendations can you suggest to reduce the number of sanctioned participants?

IF YOU ARE A DPSS EMPLOYEE, THANK YOU FOR COMPLETING THE SURVEY.

IF YOU ARE A RITE, ACS OR MAXIMUS EMPLOYEE, PLEASE ANSWER THE ADDITIONAL FOLLOWING QUESTIONS:

37. Once you determine that a GAIN participant has become noncompliant, how soon do you contact the DPSS office in order to recommend they be sanctioned? (%)

Same Day 11.9	Next Day 16.4	Same Week 25.2
On the 21st day 20.8	After the 21 day 18.2	Not Applicable 7.5

38. Do you discuss a GAIN participant's potential sanction with a DPSS worker? (%)

Yes 27.2	No 34.9	Not Applicable 37.9
--------------------	-------------------	-------------------------------

39. Do you ever experience difficulty contacting the DPSS worker ? (%)

Yes	No	Not Applicable
59.6	19.9	20.5

40. How frequently do you have difficulty contacting the DPSS worker? (%)

Always	Frequently	Sometimes	Never	Not Applicable
16.8	22.8	32.9	9.0	18.5

41. In your opinion, how often is the response received on time from DPSS when a participant is to be sanctioned ? (%)

Always	Frequently	Sometimes	Never	Not Applicable
7.5	22.4	39.1	8.0	23.0

42. Are there delays or barriers in your communications with DPSS in conducting the following activities? (%)

Recommending that A participant be sanctioned	Yes	No	Not Applicable
	34.4	65.6	0

Recommending a Sanction be lifted	Yes	No	Not Applicable
	56.3	43.7	0

42a. If you answered yes to Question 42, how easy or difficult is it to communicate with the DPSS workers in the following areas? (%)

Recommending that a participant be sanctioned	Easy	Somewhat easy	Somewhat Difficult	Difficult
	28.3	33.7	30.4	7.6

Recommending a sanction be lifted	Easy	Somewhat easy	Somewhat Difficult	Difficult
	13.0	27.2	45.7	14.1

43. After a participant has come back into compliance, on average how soon is their full cash aid amount restored? (Please choose only one)

(%)

Within the month	50.9
Between one and two months	12.6
Between two and three months	1.9
Longer than three months	0.6
Don't know	34.0

THANK YOU FOR PARTICIPATING IN THIS SURVEY

Appendix B

Technical Appendix Methodology

B.1 Selection of Study Groups (Administrative Data)

CalWORKs participants who entered registered in the GAIN program between April 2002 and September 2003 were selected for this study. These participant's program history was tracked through February 2004.

B.2 Sample Selection of Focus Group Participants

A sample of participants for the focus group interviews was drawn from the following four categories of GAIN participants: 1) English speaking Hispanic sanctioned participants; 2) English speaking Non-Hispanic sanctioned participants; 3) Spanish speaking sanctioned participants; and 4) English speaking recently noncompliant participants.

The sanctioned participants were selected from the population sanctioned in the month of April 2004. This sample also included participants that were sanctioned earlier but had their sanctions cured before April 2004. This allowed the selection of both currently sanctioned and recently cured participants for the interviews. The noncompliant population was selected from participants who were noncompliant in January or February 2004 and returned to compliance in later months.

All the participants in the focus group interviews were post-reform participants who entered CalWORKs program for the first time after April 2002. The sanctioned population was selected from three strata: 1) currently sanctioned vs. recently cured; 2) long-term sanctioned vs. short-term sanctioned; and 3) large vs. small family size.

A short-term sanction period was defined as a sanction period of less than or equal to 90 days (30 days for recently cured). Long-term period was over 300 days of sanction duration and 180 days for recently cured duration. Participants with 91-299 days of sanction were not considered for selection. A small family size consisted of one to three individuals; a large family consisted of four or more individuals. The noncompliant group was stratified by the last activity attended before becoming noncompliant, such as job club, training, and other program components.

Overall 221 sanctioned participants, i.e., 58 recently cured English speaking Hispanic participants, and 113 sanctioned and 27 cured Spanish-speaking participants were selected for the focus group interviews. Random sampling using the SAS program was used to select participants for the focus group interviews.

B.3 Data Sources

Monthly administrative data on GAIN participants was provided by DPSS. Data from LEADER (the existing computer system used by DPSS) provided information on participant's individual characteristics (such as age, gender, ethnicity, and primary language), family characteristics (such as family size, marital status, and number and age of children), welfare history and amount of cash aid.

The current study examined data from the LEADER system. In 2000, the DPSS data systems underwent a conversion from the Legacy system in which sanctions were issued manually to the automated LEADER system. Some problems have lingered as a result of this automation process and should be kept in mind in making conclusions about the data.

DPSS also provided data on Welfare-to-Work activities from the monthly GEARS files (data system used by DPSS to track participant's activities in the GAIN program). Data from GEARS provided information on participant's Welfare-to-Work activities such as registration status (exempt or mandatory), compliance status, participation in Job Club, training and SIP, utilization of specialized supportive services (domestic violence, mental health, substance abuse and clinical assessment) and other supportive services (child care services and transportation payments). The GEARS tables included data on participants beginning from April 1998. DPSS also provided monthly cumulative sanction files with participant's sanction histories.

Base wage data of participants was provided by California Department of Social Services (CDSS) using the Unemployment Insurance Program database. The database included quarterly earnings for all welfare participants who were eligible for Medi-Cal. The data was calculated from January to December 2003.

B.4 Descriptive and Multivariate Tables

The following tables provide descriptive statistics for the GAIN population examined in the multivariate analysis. The descriptive tables provide a distribution of the variables used in the multivariate analysis. The multivariate tables show all the variables entered in the various models.

Table B.1		
Descriptive Characteristics of Participants Completing and Not Completing Orientation		
Independent Variable	Completed Orientation (N = 24,778)	Did Not Complete Orientation (N = 9,378)
Sex (%)		
Male	26.6	34.2
Female	73.4	65.8
Age Group (%)		
18-25	34.7	32.7
26-35	32.6	34.4
36-45	23.6	24.0
46 and over	9.1	8.9
Ethnicity (%)		
White	16.7	19.6
African American	24.3	22.9
Hispanic	50.9	50.6
Asian / Other	8.1	6.9
Language (%)		
English	77.1	80.3
Non-English speaking	22.9	19.7
Marital Status (%)		
Married	27.2	27.0
Not Married	72.8	73.0
Region (%)		
Region I	10.8	12.3
Region II-ACS	13.1	15.4
Region III	17.7	17.7
Region IV	16.2	15.4
Region V	15.8	16.0
Region VI	14.4	15.6
Region VII-MAXIMUS	6.1	4.6
RITE Offices	5.9	3.0
Mean Household Size (SD)	3.5 (1.5)	3.6 (1.6)
Mean Number of Aided Children (SD)	1.8 (1.1)	1.9 (1.1)

SD = Standard Deviation. Source: DPSS; GEARS, LEADER 2002-2004. Cumulative Sanction File February 2004.

Table B.2				
Factors Predicting the Probability of Completing Orientation				
Independent Variable	Log Odds	Odds Ratio	95% Confidence Level	
			Lower	Upper
Intercept	-0.1			
Sex				
Female	0.2	1.2*	1.2	1.3
Age Group				
Reference Group = 46 years and older				
18-25	0.0	1.0	0.9	1.1
26-35	-0.1	0.9	0.8	1.0
36-45	0-.1	0.9	0.8	1.0
Ethnicity				
Reference Group = White				
African American	0.3	1.4*	1.3	1.5
Hispanic	0.3	1.3*	1.2	1.4
Asian / Other	0.3	1.3*	1.2	1.5
Language				
English vs. Non-English speaking	0.2	1.2*	1.1	1.3
Marital Status				
Not Married vs. Married	0.2	1.3*	1.2	1.4
Region				
Reference Group = Region II-ACS				
Region I	-0.1	0.9	0.9	1.0
Region III	0.2	1.2*	1.1	1.3
Region IV	0.1	1.1*	1.0	1.2
Region V	0.0	1.1	1.0	1.2
Region VI	0.0	1.0	0.9	1.1
Region VII-MAXIMUS	0.3	1.3*	1.1	1.5
RITE Offices	1.0	2.8*	2.4	3.3
Aid Type				
Single versus Two Parent Aid	0.4	1.5*	1.4	1.6
Household Size	0.0	1.0	1.0	1.0
Number of Aided Children	0.0	1.0	0.9	1.0
Number of Months in GAIN Program	0.2	1.2*	1.2	1.2
Not Employed In Year Prior to Entering GAIN	-0.1	0.9*	0.8	0.9

*p ≤.05 Source: DPSS; GEARS, LEADER 2002-2004. Cumulative Sanction File February 2004.

Table B.3				
Descriptive Characteristics of Sanctioned and Never Sanctioned Participants				
Independent Variables	Completed Orientation		Did Not Complete Orientation	
	Sanctioned (N = 5,553)	Never Sanctioned (N = 20,754)	Sanctioned (N = 3,976)	Never Sanctioned (N = 6,737)
Sex (%)				
Male	29.6	25.8	39.7	29.4
Female	70.4	74.2	60.3	70.6
Age Group (%)				
18-25	39.6	33.2	33.5	34.5
26-35	33.0	32.2	37.3	31.6
36-45	20.3	24.8	22.1	23.8
46 and over	7.1	9.8	7.1	10.1
Ethnicity (%)				
White	13.1	20.0	17.7	21.7
African American	26.5	23.2	22.6	22.4
Hispanic	54.2	48.2	53.1	48.6
Asian / Other	6.2	8.6	6.6	7.3
Language (%)				
English	83.2	73.7	82.2	77.7
Non-English speaking	16.8	26.3	17.8	22.3
Marital Status (%)				
Currently Married	21.3	30.3	25.5	27.8
Single	78.7	69.7	74.5	72.2
Region (%)				
Region I	10.7	10.6	12.2	11.9
Region II-ACS	14.1	12.4	16.0	14.0
Region III	18.3	16.9	16.7	17.1
Region IV	19.9	14.6	17.2	13.7
Region V	15.1	15.5	15.3	17.6
Region VI	16.7	13.4	17.6	14.1
Region VII-MAXIMUS	3.6	6.8	3.6	6.4
RITE Offices	1.6	9.8	1.4	5.2
Utilized Child Care (%)				
Yes	12.2	21.4	na	na
No	87.8	78.6	na	na
Completed Job Club (%)				
Yes	9.1	15.0	na	na
No	90.9	85.0	na	na
Utilized SIP (%)				
Yes	5.2	9.7	na	na
No	94.8	90.3	na	na
Utilized Specialized Supportive Services (%)				
Yes	3.5	9.4	na	na
No	96.5	90.6	na	na
Utilized Transportation (%)				
Yes	50.5	59.5	na	na
No	49.5	40.5	na	na
Received Training After Job Club and Assessment (%)				
Yes	3.5	11.4	na	na
No	96.5	88.6	na	na
Mean Number of Household Size (SD)	3.6 (1.6)	3.5 (1.4)	3.8 (1.6)	3.5 (1.5)
Mean Number of Children on Aid (SD)	1.9 (1.1)	1.8 (1.0)	2.0 (1.2)	1.7 (1.1)

SD = Standard Deviation, NA = not applicable, variables not entered in the regression model *p ≤ .05 .

Source: DPSS; GEARS, LEADER 2002-2004. Cumulative Sanction File February 2004

Table B.4
Factors Predicting the Probability of Being Sanctioned

Independent Variables	Completed Orientation				Did Not Complete Orientation			
	Log	Odds	95% Confidence Level		Log	Odds	95% Confidence Level	
	Odds	Ratio	Lower	Upper	Odds	Ratio	Lower	Upper
Intercept	-1.6*				-0.8*			
Sex – Female vs. Male	-0.2	0.8*	0.7	0.9	-0.4	0.6*	0.6	0.7
Age Group (Reference Group = 46+ years)								
18-25	0.5	1.7*	1.5	1.9	0.4	1.5*	1.2	1.7
26-35	0.3	1.4*	1.2	1.6	0.4	1.6*	1.3	1.8
36-45	0.1	1.1*	1.0	1.3	0.2	1.2*	1.0	1.5
Ethnicity (Reference Group = White)								
African American	0.1	1.1*	1.0	1.3	0	1.0	0.9	1.2
Hispanic	0.2	1.2*	1.1	1.3	0.1	1.1*	1.0	1.3
Asian / Other	0.2	1.2*	1.1	1.4	0.2	1.3*	1.0	1.5
Language – English vs. Non-English speaking	0.3	1.3*	1.2	1.5	0.2	1.3*	1.1	1.4
Marital Status - Married vs. Single	-0.4	0.7*	0.6	0.8	-0.3	0.7*	0.7	0.8
Region (Reference Group =2-ACS)								
Region I	-0.1	0.9	0.8	1.0	-0.1	0.9	0.8	1.1
Region III	-0.1	0.9	0.8	1.0	-0.2	0.8*	0.7	0.9
Region IV	0.2	1.2*	1.1	1.3	0.1	1.1*	1.0	1.3
Region V	-0.2	0.8*	0.7	0.9	-0.3	0.7*	0.6	0.9
Region VI	0.1	1.1*	1.0	1.3	0.1	1.1	0.9	1.3
Region VII-MAXIMUS	-0.8	0.5*	0.4	0.6	-0.8	0.5*	0.4	0.6
RITE Offices	-1.7	0.2*	0.1	0.2	-1.3	0.3*	0.2	0.4
Utilized Child Care	-0.5*	0.6*	0.5	0.7	n/a	n/a	n/a	n/a
Job Club – Completed (Ref group = Did not Participate)	-0.3	0.7*	0.7	0.8	n/a	n/a	n/a	n/a
Job Club - Did Not Complete	0.4	1.5*	1.4	1.6	n/a	n/a	n/a	n/a
Enrolled in SIP	-0.5	0.6*	0.5	0.7	n/a	n/a	n/a	n/a
Utilized Specialized Supportive Services	-0.9	0.4*	0.3	0.5	n/a	n/a	n/a	n/a
Utilized Transportation	-0.5	0.6*	0.6	0.6	n/a	n/a	n/a	n/a
Received Training after Job Club and Assessment	-1.1	0.3*	0.3	0.4	n/a	n/a	n/a	n/a
Aid Type - Single versus Two Parent Aid	0.0	1.0	0.9	1.0	-0.2	0.8*	0.7	0.9
Household Size	0.0	1.0	1.0	1.0	0.0	1.0	1.0	1.1
Number of Aided Children	0.1	1.1*	1.1	1.2	0.2	1.2*	1.1	1.3
Number of Children Under One Year	-0.3	0.7*	0.7	0.8	-0.3	0.7*	0.7	0.8
Number of Months in GAIN Program	0.0	1.0*	1.0	1.1	0.0	1.0*	1.0	1.0
Not Employed in Year Prior to Entering GAIN	-0.1	0.9*	0.8	1.0	-0.1	0.9*	0.8	1.0

NA = Not applicable. Variables not entered in the regression model. * = $p \leq .05$ Source: DPSS; GEARS, LEADER 2002-2004. Cumulative Sanction File February 2004.

Table B.5
Factors Predicting the Probability of Returning to Compliance
Log Odds (Odds Ratio)

Independent Variables	Leaving CalWORKs (N = 2,080)	Returning to Compliance (N = 1,881)
	vs. Staying Sanctioned (N = 1,592)	vs. Staying Sanctioned (N = 1,592)
Intercept	1.31*	-0.17
Sex		
Female	0.08 (1.08)	0.14 (1.15)
Age Group		
Reference Group = 46 years and older		
18-25	0.09 (1.09)	0.14 (1.15)
26-35	-0.12 (.89)	0.08 (1.08)
36-45	-0.12 (.89)	-0.04 (.96)
Ethnicity		
Reference Group = White		
African American	0.04 (1.04)	0.21 (1.23)
Hispanic	-0.13 (0.88)	-0.16 (0.85)
Asian / Other	0.22 (1.24)	0.16 (1.17)
Language		
English vs. Non-English speaking	0.42* (1.52)	0.36* (1.43)
Marital Status		
Not Married vs. Married	0.03 (1.03)	-0.06 (0.94)
Region		
Reference Group = Region II-ACS		
Region I	0.01 (1.01)	0.01 (1.01)
Region III	0.05 (1.05)	0.03 (1.03)
Region IV	-0.26* (0.77)	-0.24* (0.79)
Region V	0.08 (1.08)	-.21 (0.81)
Region VI	0.16 (1.17)	-0.01 (0.99)
Region VII-MAXIMUS	-0.01 (0.99)	-0.29 (0.75)
RITE Offices	-1.07* (0.34)	-1.83* (0.16)
Utilized Child Care	-0.27* (0.76)	-0.29* (0.75)
Job Club (Reference Group = Did not participate)		
Completed	0.29* (1.34)	0.63* (1.88)
Did Not Complete	0.14* (1.15)	0.44* (1.55)
Enrolled in SIP	-0.09 (0.91)	-0.30 (0.74)
Utilized Specialized Supportive Services	0.12 (1.13)	-0.36 (0.70)
Utilized Transportation	-0.40* (0.67)	-1.71* (0.18)
Received Training after		
Job Club and Assessment	-0.13 (0.88)	-1.21* (0.30)
Aid Type		
Single versus Two Parent Aid	-0.21* (0.81)	-0.06 (0.94)
Household Size	-0.01 (0.99)	-0.01 (0.99)
Number of Aided Children	-0.09 (0.91)	-0.1 (0.90)
Number of Children Less than One Year	-0.19* (0.83)	-0.23* (0.79)
Number of Months in GAIN Program	-0.08* (0.92)	0.12* (1.13)
Not Employed In Year Prior to Entering GAIN	-0.22* (0.80)	-0.17* (0.84)

*p ≤ .05 Source: DPSS; GEARS, LEADER 2002-2004. Cumulative Sanction File February 2004.

Table B.6		
Factors Predicting the Probability of Being Noncompliant or Always Compliant vs. Being Sanctioned		
Log Odds (Odds Ratio)		
Independent Variables	Noncompliant (N = 17,484) vs. Sanctioned (N = 9,529)	Always Compliant (N = 10,415) vs. Sanctioned (N = 9,529)
Intercept	0.76*	1.54*
Sex		
Female	0.18* (1.20)	0.35* (1.42)
Age Group		
Reference Group = 46 years and older		
18-25	-0.46* (0.63)	-0.63* (0.53)
26-35	-0.23* (0.79)	-0.59* (0.55)
36-45	-0.08 (0.92)	-0.21* (0.81)
Ethnicity		
Reference Group = White		
African American	-0.05 (0.95)	-0.33* (0.72)
Hispanic	-0.16* (0.85)	-0.21* (0.81)
Asian / Other	-0.18* (0.84)	-0.22* (0.80)
Language		
English vs. Non-English speaking	-0.07 (0.93)	-0.75* (0.47)
Marital Status		
Married vs. Single	0.31* (1.36)	0.50* (1.65)
Region		
Reference Group = Region II-ACS		
Region I	0.18* (1.20)	-0.10 (0.90)
Region III	0.18*(1.20)	-0.23* (0.79)
Region IV	-0.03 (0.97)	-0.64* (0.53)
Region V	0.26* (1.30)	0.06 (1.06)
Region VI	-0.02 (0.98)	-0.39* (0.68)
Region VII-MAXIMUS	0.07 (1.07)	1.57* (4.81)
RITE Offices	-0.43* (0.65)	2.64* (14.01)
Utilized Child Care	0.42* (1.52)	0.77* (2.16)
Job Club		
Completed	0.34* (1.40)	0.24* (1.27)
Did Not Complete	-0.31* (0.73)	-0.90* (0.41)
Enrolled in SIP	0.50* (1.65)	0.55* (1.73)
Utilized Specialized Supportive Services	0.89* (2.44)	0.88* (2.41)
Utilized Transportation	0.57* (1.77)	0.47* (1.60)
Received Training after		
Job Club and Assessment	0.70* (2.01)	1.94* (6.96)
Aid Type		
Single versus Two Parent Aid	0.04 (1.04)	0.03 (1.03)
Household Size	0.02 (1.02)	-0.03 (0.97)
Number of Aided Children	-0.13* (0.88)	-0.12* (0.89)
Number of Children Under One Year	0.27*(1.31)	0.51*(1.66)
Number of Months in GAIN Program	-0.02* (0.98)	-0.11*(0.90)
Not Employed In Year Prior to Entering GAIN	0.04 (1.04)	0.27* (1.31)

Note: The regression model is among participants who completed Orientation. *p ≤.05

Source: DPSS; GEARS, LEADER 2002-2004. Cumulative Sanction File February 2004.

Appendix C

Focus Group Methodology

C.1 The Purposes and Advantages of a Qualitative Methodology

The research on sanctions addresses two broad questions: To what extent do sanctions achieve their goal of encouraging welfare parents to participate in GAIN's mandated activities? And how, and at what points in the program, can the number of sanctions be decreased? Quantitative and qualitative methods approach these questions in different, but complementary, ways. Using random samples and standardized questions, surveys have the advantage of producing statistical data that identify patterns that are broadly representative of, and can be generalized to, the larger sanctioned and GSW populations.

By contrast, focus groups are moderated discussions of a predetermined topic that involve a small group of people. Engaged in a focused, yet informal and open-ended discussion, focus groups reveal what surveys cannot—in this case, an in-depth, “person level” exploration of GSW and GAIN participants’ perceptions and experiences with sanctions. However, when reading their words, it is important to keep in mind that while focus groups provide an understanding of individual and shared experiences and perceptions, their members may not be representative of GAIN participants as a whole. Therefore, their responses may not be generally applied to the larger population. However, the advantage of this qualitative method is that it can capture the knowledge and lived experience of sanctioned parents and GSWs. Focus groups also hold the possibility of discovering new information that may not have been previously known or included in surveys.

Focus groups thus complement surveys by revealing important data obscured by numbers, a concrete sense of how things really happen. For participants, this means focusing on processes and connections between knowing about the requirements of the GAIN program and sanctions for not following them, the impact of sanctions on participants’ decisions to comply or not to comply with program requirements, and the consequences of noncompliance on the lives of parents and their children. For GSWs, focus groups provide understandings of how sanctions patterns may be affected by their perceptions of parents’ participation in the program as well as the impact of their working conditions on sanctioning patterns. While it may not be generally applied to larger populations, as noted above, the strength of focus group findings may be demonstrated in instances in which there is consistency between focus group findings and results of quantitative surveys.

Finally, participants sometimes spoke sharply and critically. Researchers encouraged openness and assured them that their anonymity and privacy were protected by Federal and State laws. In assessing such findings, it is important to remember that the purpose of the research was to tap experience and perceptions that may, from the points of view of GAIN participants, affect compliance with the program rather than to

seek verification of what participants say. It is also important to note that participants and GSWs are literally speaking in their own words, and that everyday, unrehearsed speech is very different from carefully crafted, grammatically correct written text. The goal of focus groups is to capture the spontaneity and unedited insights of an informal discussion. In accordance with accepted conventions for qualitative research, focus group members' words are quoted verbatim and indented in the report.

C.2 The Design and Conduct of Focus Group Methodology

All decisions about the research design, as well as the interpretation and presentation of focus group results, were made in consultation with the RES survey research team.

Sampling Design: A purposeful sampling design was used to gather data from four participant and two GSW focus groups conducted in July 2004. Consistent with the objectives of the study to gain insight into the relatively high rates of sanctions in the County of Los Angeles, the following criteria were used to select participants for inclusion in the groups: 1) GAIN Regions that had comparatively high rates of sanctions: two were selected; 2) within these offices, Spanish and English-speaking participants; and 3) participants with varied sanctions histories: those who had been sanctioned but were now cured, those who had been sanctioned less than three months, and those who had been sanctioned for more than a year. In addition, the research design calls for one group containing participants who were not in compliance with GAIN regulations and therefore "at risk" of being sanctioned. The research plan is to conduct a follow-up focus group in Phase II of the research in order to track their progress in coming into compliance or being sanctioned. This longitudinal approach will provide the opportunity to closely follow how participants' responses to sanctions and their impacts develop over time.

GSW focus group participants were drawn from the same two GAIN offices with relatively high rates of sanctions as those of the participant groups.

Recruitment: Focus group members were drawn from lists provided by RES containing randomly selected names of participants whose language and sanction profiles matched the sampling design. Sanctioned focus groups were to contain a representative number of sanctioned and cured participants and members with large and small families. However, because of the difficulties encountered in recruiting participants, each group did not contain equal numbers of participants with these characteristics. In addition, researchers conducted three telephone interviews with Spanish-speaking participants who could not be accommodated because they came late to the group and three telephone interviews with noncompliant participants who indicated a willingness to participate but did not come to the group.

Researchers recruited participant focus group members over the telephone. Participants were told that researchers wanted to hear about their experiences and perceptions of sanctions in order to better understand how the process is working in the County of Los Angeles and to help assess whether sanctions enhance participation in

the GAIN program. They were told that the group would be held at a GAIN office, that it would last for about two hours, and that anything they said in the group would remain confidential. To encourage involvement, they were promised a \$50 food gift certificate for their participation in the group.

In recruiting members of GSW focus groups, researchers described the study to GAIN office supervisors and asked that they recruit GSWs who had experience with sanctions for the groups.

Participant and GSW Focus Group and Interview Profiles: Twenty-six participants were involved in the qualitative component of the study (twenty focus group members and six telephone interviews), and focus groups ranged in size from three to six participants (excluding telephone interviews). Focus group members ranged in age from their early 20s to early 50s. The majority were single women (English speaking: 9 of 12 and Spanish speaking: 6 of 8; and noncompliant: 6 of 6). Some had physical and mental health problems. All had stress and were either under or unemployed and were struggling with low-wage skills and limited education to make ends meet. Participant focus groups and telephone interviews contained members with the following sanctions patterns (note: the cured category includes participants who had been sanctioned through bureaucratic error or who are now exempted from the program).

Table C.1 Participant Focus Group and Telephone Interview Profiles

<u>Language</u>	<u>Sanction Status</u>
Sanctioned English-speaking	
Sanctioned	4 (3 long, 1 medium, 1 short)
Cured:	2 (1 long, 1 short)
Sanctioned English-speaking	
Sanctioned	3 (all short)
Cured	3 (2 long, 1 short)
Sanctioned Spanish-speaking	
Sanctioned	4 (3 short, 1 long)
Cured	4 (short, medium, long)
Noncompliant English-speaking (As of April 2004)	
Sanctioned	1
Compliant	5
Total Participants	26

GSW focus groups contained a mix of GSWs with “regular” caseloads and those who had specialties in handling certain kinds of cases. The latter tended to have smaller caseloads. The GSW group from the predominantly English speaking region contained six members (3 men and 3 women), and the group from the Spanish-speaking region contained seven members (3 men and 4 women).

C.3 Focus Group Conduct

Researchers formulated focus group questions based on a review of study objectives described in the research plan provided by RES and in consultation with the RES survey team. Focus group questions were also pretested and submitted to service providers who regularly worked with participants and to DPSS for review and revision prior to conducting the focus groups. The focus group facilitators asked open-ended questions to elicit “person-level” data regarding the extent that sanctions, instituted for the purpose of compelling welfare participants to participate in mandated activities, achieve their intended goal. Specifically, questions were designed to focus on the following themes (Find a full listing of focus group questions below:

- Factors associated with being sanctioned, e.g., factors leading to sanctions such as participant knowledge of the sanction process
- Factors that led to return to compliance, continuing to be sanctioned, or leaving the program, e.g., barriers to a sanction cure, reasons why participants do not take action to cure their sanction
- Program effects or factors that are associated with participants’ noncompliance
- Role of the need for supportive services among participants and its association with noncompliance leading to sanctions
- Participants’ perceptions of problems associated with their noncompliance
- Participant recommendations for how sanctions might be employed more effectively

Researchers directed questions toward eliciting informal discussion that would encourage participants to talk about their perceptions and experiences of these issues. Participants and GSWs were reminded of the purpose of the questions and that what they said in the groups would be written into a report but that nothing they said would be attributed to them directly. Each person was encouraged to respond to all questions. The range of responses suggests that participants felt that they could be candid in voicing their experiences and perceptions.

All groups, except the Spanish-speaking participant focus group, were conducted in English. Responses from the focus groups were transcribed by an independent transcription service, and Spanish-speaking focus group findings were translated into English. Researchers coded and analyzed transcripts from the focus group interviews for themes related to the study objectives, and responses that represent the range of participant responses were included in the report.

C.4 Focus Group Questions for Participants

Introduction

Welcome. As parents in CalWORKs, you have been invited here to participate in a study about the County of Los Angeles' Welfare-to-Work program. DPSS wants to find ways to increase the involvement of parents like you in GAIN activities and services designed to help them move from welfare to economic independence.

In particular, the County would like to reduce the number of parents who drop out or who, for some reason, do not attend required activities or follow the requirements of the program and, as a consequence, are sanctioned or are in noncompliance and at risk of being sanctioned and losing the adult portion of their cash aid.

You have been randomly selected to attend this discussion group because at some point in your relations with CalWORKs and GAIN, you have been sanctioned or were at risk of being sanctioned for not following the programs rules.

The purpose of this meeting is to understand your experiences with being in noncompliance and sanctioned and to ask you to make recommendations about ways in which the situation can be avoided or stopped ("cured") so that more parents can participate in GAIN and get the most out of the Welfare-to-Work program.

We are not here to judge you in any way but to listen to your stories and learn from your experience in order to improve the GAIN program and the lives of parents like you. Please feel free to express your opinions honestly and openly.

- Assurance of confidentiality
- Filling out the consent form and signing for the food certificate.
- The focus group rules of procedure: Speak one at a time; give other people time to speak; give your first name when you speak.

Getting to know each other: information about you, your family, welfare, work situation

First, let's go around the table and get acquainted. Tell us your name and about the adults and children who are living in your household and a little about your background.

1. Currently, in addition to yourself, how many people are covered by CalWORKs aid under your name? How many children are in your family? How many people live in your household?
2. In what year did you first begin receiving aid from CalWORKs? What was your last CalWORKs activity?

3. In the past three years, has your cash aid been reduced, or were you told that it might be reduced? Do you know why? If they don't mention sanctions, ask: Were you ever told that you stopped receiving aid because you were not in compliance with GAIN requirements or that you might stop receiving aid because you were not in compliance with GAIN requirements? How many times, and what was the reason each time?
4. What rules were you told that you violated?

Knowledge about the meaning of noncompliance and sanctions, experience of being at risk for sanctions and experiencing the sanctioning process, and how to be in compliance and restore cash benefits

1. Tell us in your own words what that led to your being in noncompliance or sanctioned. Give us a little history about what happened starting from the time you were first notified of noncompliance to any actions you or your case worker took afterwards to communicate with each other, investigate "good cause" for the sanction, appeal the sanction; or move to develop a work plan and reinstate aid.

If not covered in the narrative above, probe for:

- a. When did sanctions occur, that is, at what point in contact with GAIN?
- b. Why were you sanctioned (i.e., what rule did you violate)?
- c. Did you realize you were violating GAIN rules, and understand the reason for your sanction—had the rules ever been explained to you?
- d. What happened that you were unable to follow GAIN rules or why did you decide that it was in your interest not to follow them? For example, didn't know the rules, didn't receive the Notice of Action far enough ahead of the deadline for contacting your GSW to talk about it, had a good cause for not following the rules (including serious personal problems like SA, DV, MH, which needed treatment, transportation or child care problems), decided that you and family were better off not participating and taking the financial loss?
- e. How did you find out that you were violating the rule? Describe the conversations with GSWs and what happened? Did you receive the Notice of Action 20 days before the deadline for contacting your worker, and did you contact your case worker within 20 days after you received the Notice of Action? Was the notice written in the language that you speak? Was the notice easy or difficult to understand?
- f. Did you try to explain to your GSW the circumstances that led to your sanctions—what happened? How do you feel about what happened? Do you think the GSW treated you fairly? Did you know that you could appeal the sanction? If so, how did you learn about it?
- g. Did you try to appeal the sanction—did you talk to anyone or ask anyone for assistance and what happened? Did you feel the process was fair? Did

you feel that anyone really listened to you and understood your situation and your side of the story?

- h. What did your worker say that you had to do to remove or to avoid the sanction? Did you try to do what s/he said you needed to do? If not, why not? If you managed to remove the sanction, how did you do that?
- i. Did you develop a compliance plan and return to compliance with GAIN rules? How difficult or easy was it to follow? Did you think about leaving CalWORKs? Explain what happened.
- j. Do you think that you will be able to avoid sanctions in the future? How? Did receiving a sanction or being told that you might receive a sanction help you to avoid sanctions in the future?
- k. What could GAIN do to help you avoid sanctions in the future?
- l. Did you ever wonder about the meaning of the following terms? Were they explained to you?
 - Compliance
 - Good Cause
 - Sanction
 - Notice of Action
 - Compliance Plan

Impact of sanctions on parents and their families

Now, we'd like to know how, and to what extent, being sanctioned affected you and your family financially or in any other way?

1. During the time that your cash aid was withheld, did you continue to receive other benefits, e.g., Food Stamps, Medi-Cal, etc.?
2. Were there basic necessities that you could not provide? For example, were you unable to pay your rent, utilities, child care, or to provide food or clothing for your family?
3. How did you make up for the money you lost in cash aid? Probe, for example, did you cut back on expenses, take an extra job, work longer hours, or ask family or friends for help? What reason did you give for needing the help? How did they respond? Do you have to pay them back? Did sanctions encourage you to look harder for work?
4. What, if any, impact did the loss of cash aid have on your family? How did the loss of cash aid affect the emotional well-being of you and your family members, for example, was there more stress or tension in the family?
5. Did you have any difficulty getting your cash aid (and other benefits?) restored once your sanction ended?

6. What has your relationship with your GSW been like since you were sanctioned?
7. What, if any, impact does the sanction have on your ability to fulfill your welfare to work plan?
8. Did being sanctioned make you more likely to be more involved in required GAIN activities?
9. Did being sanctioned make you consider dropping out of GAIN?
10. Did being sanctioned have an impact on whether or not and how much you worked?

Conclusions and Overall View of Sanctions

1. Sanctions are designed to encourage parents on aid to fulfill their welfare to work plans so that they can reach self-sufficiency under welfare reform. Overall, do you feel that sanctions are an effective means of encouraging parents like yourself to participate in Welfare-to-Work programs and to reach self-sufficiency? In your experience, have sanctions, or the threat of sanctions, motivated you to stay in the GAIN program and take advantage of its services.
2. Is there any kind of assistance that you could have been given that would have helped you to avoid sanctions or noncompliance with requirements? For example, could your sanctions have been avoided if you had been given more information about sanctions, adequate child support, and access to supportive services like MH, SA, and DV? Is there any kind of assistance that might help you to avoid sanctions in the future?
3. From your experiences, what recommendations would you make to reduce sanctions and increase the participation of parents in GAIN activities and services? Probe: Is it a matter of getting more knowledge about the rules; better notification of noncompliance; better communication with your caseworkers; more information about the process of appealing a sanction or ending it by finding a way to comply with the rules, or asking for more help in overcoming personal problems that led to noncompliance in the first place?

We thank you for telling us about your experiences and we welcome your recommendations.

C.5 Focus Group Questions for GSWs

Introduction

Who we are: university professors and independent researchers contracted by the County of Los Angeles to conduct focus groups as part a team doing research on sanctions for the Board of Supervisors and DPSS.

We need your help, specifically, to draw on your expertise and experience with the sanction process to better understand how staff and parents on aid learn about and understand the sanctions process, how the process works (its strengths and weaknesses, if any), and your opinions about what policy changes could be made to decrease the number of sanctions and to make them more effective in achieving the goal of compliance with GAIN requirements.

Assurance of Confidentiality

Focus Group Rules: give your names when you speak; one person speaks at a time; give others time to talk.

Your expertise and experience in dealing with sanctions

1. To start out, let's go around the table. Tell us your name, how long you have worked as a GSW and in what capacity or specialization.
2. Next, tell us about compliance activities you have been involved in (for example, educating participants to the rules, working with non-compliant but non-sanctioned participants, and implementing the various phases of the sanctioning and curing process).
3. Finally, describe your case load in terms of numbers and the types of parents you ordinarily serve, and the languages you use in your work.

Walking us through the sanctioning and curing process and your experience with sanctioning

1. To help us understand better the process of determining noncompliance and imposing and curing sanctions, walk us through the stages in the sanctioning and curing process.
2. Specifically, at what points in the process and in what activities are GSWs in your office involved? At what points do you have discretion in imposing sanctions and also in interpreting good cause criteria?
3. Please give us an example of a time when a decision about whether or not to impose a sanction might have gone either way.

4. Do you think that GSWs generally have the same understanding, or do they ever have different understandings of what constitutes a sanction and how to cure a sanction? If they have different levels of understanding, how do you account for this?
5. Do you feel that you have enough information about the sanctions process and rules?
 - a. How did you acquire this information? For example, what kind of training did you receive to deal with sanctions and keep up to date about the sanctioning process? Do you feel that your training was adequate for the task? Do you feel that anything has changed in the way you impose sanctions as you have gained experience in using them to encourage participation in mandated activities?
6. How do you attempt to insure that participants on your caseload have a good understanding of sanctions and the sanctioning process, for example, the purpose of sanctions and what would happen if participants fail to adhere to GAIN requirements?
 - a. Please give us examples of when you think your approach has worked well to encourage compliance and when these measures have not worked well.
 - b. On the whole, do you think that participants have an adequate understanding of behaviors that result in sanctions and how the sanction process works?
7. What, if any, are the most frequent points in the GAIN program when sanctions occur and what requirements are most frequently violated?
 - a. Why do you think that sanctions tend to “cluster” in this way? In your experience, are high levels of sanctions associated with particular characteristics of participants, for example, parents who have the most barriers because of their age, gender, language, education, work experience, or need for supportive services?
 - b. How do you explain these patterns?
 - c. Is there anything in program policy that could be done differently to rectify them?
8. Do you feel as though you are sanctioning some participants more than others? For example, do you see differences in short-term and long-term sanctioned participants?
9. The County of Los Angeles has a comparatively high level of sanctions. What factors do you think are most responsible for these high levels of sanctions? Can you identify any trouble spots or breakdowns in the sanction process that might result in unnecessarily high levels of noncompliance and sanctions? If

not mentioned in their answers, probe: For example, trouble spots at the level of training case workers, high case loads, the size of offices, errors in issuing sanctions, appointment letters not being issued in a timely fashion, GEARS but not LEADER issuing sanctions, etc.?

C.6 Recommendations

What recommendations or suggestions do you have for policy changes that could decrease the number of sanctions and increase participants' involvement in, and compliance with, GAIN activities? If not mentioned in their answers, probe: For example, educating participants, early identification of those with behavior problems that could result in noncompliance, more timely notification of noncompliance, expanding the reasons for good cause determination, scheduling appointments, arranging appeals, level of penalties, or errors in issuing sanctions, working with clients to revise their Welfare-to-Work plans to avoid sanctions, rescheduling appointments to give participants another opportunity to participate, etc.

Appendix D

GSWs' Recommendations for Encouraging Compliance and Reducing Sanctions

At the end of the two focus group sessions, researchers asked GSWs to offer recommendations for reducing sanctions and encouraging compliance. What follows are summaries of what they said with indented quotes from their own words.

1. Parents should be fully informed about the GAIN program when they first apply for aid BEFORE they come to the GAIN.

This might increase attendance at the GAIN Orientation and reduce sanctions because parents would be better informed about the purpose of GAIN and the need to attend GAIN Orientation or risk sanctions and a reduction of aid.

To drastically reduce the number of sanctions, when they come in to apply for aid, they have to attend a mandatory 30-minute workshop to explain to them what GAIN is. The majority of people the first time in GAIN don't know what it is. The vast majority of people that we sanction are during that initial Orientation. ...So a lot of people are not coming in because they don't know what the program is. If people are working, they think they don't have to participate... But if they are not meeting the hours [required by GAIN], and if they don't come in, they are going to get sanctioned, regardless of whether or not they are working.

Alternative Solution: Make attending both the CalWORKs and GAIN Orientations mandatory requirements for getting aid.

In order to be approved for the CalWORKs program, you have to spend one hour at the Orientation. So we explain to them at the beginning, before they get approved, and then they know everything already. That means that they attend the GAIN Orientation and CalWORKs Orientation before they get approved. That's one of the requirements.

2. Offer Special Services dealing with substance abuse, domestic violence, and mental illness BEFORE participants come to GAIN and face its work requirements.

There are clients who have a lot of issues before getting into a job, even school. Mental health issues. There is domestic violence. Children are a big part of that too. They are going through a lot of problems. I think they should have services available to them when they first apply for aid (through an Eligibility Worker). Not only go to work first, there are other services.

3. Cut the GAIN Orientation in half and give GSWs more time to build rapport during the first mandatory contact with caseworkers.

Establishing early rapport with participants is key to compliance.

I think it would be a great idea if we cut Orientation in half and give us more time to establish a rapport...You can have someone come in with a different mindset, a negative mindset, but if you have more time with them to establish a rapport, to motivate [them] into complying with the program. [Now] we are meeting with them from 8:00 – 9:00. If you have six participants during that time, you are rushing through what we call an intake packet, asking them questions, the most intimate questions about their household. You have very little time to establish a rapport. Then from 3:00 – 5:00 you have to meet with them again regarding assignments. It's not enough time. Like I said, that first contact makes the difference as to whether or not they are going to come back and participate.

4. Institute stricter sanctions – GSWs debate the issue.

From the perspective of some GSWs, sanctions are merely “a slap on the hand.” They encourage noncompliance. GSWs debated full-family sanctions, a policy change that would have to be made at the State not the County level.

GSW 1: If we were to sanction the whole family, and that it affected the children as well, I think we would be getting different results because now you are beginning to realize that you do really need to comply. Whereas, if it's only affecting the individual, the adults, they feel, “Well, my children are okay, so I'm okay.”

GSW 2: That's a human rights issue. The kids are innocent, it's just the adult.

GSW 1: Well some states are doing it.

GSW 3: I don't agree [about implementing full sanctions]. But I do believe there should be stricter financial sanctions. It should be something stricter ...We do all that motivation, but obviously it's not working out...I feel that's really the only way, because money talks.

GSW 3: When we first doing mailers to our participants, [saying that] after a certain date, their cash aid is going to be reduced, they would call in and they would...at first, initially, they would be concerned because it's something new to them...But then after they found out that to what degree they were going to be affected, that it was only their portion of the cash aid, they were like, “Oh, okay.” Kind of like you were wasting their time. “As long as I'm getting this.” ...it's almost a joke, a slap on the hand, the sanction that we have. And I do agree that we might see a little bit better results if we were to [have stricter sanctions], but I mean, sometimes it's very hard to apply a blanket rule to everyone because...There are different reasons as to why certain people don't want to be bothered with the GAIN program and some do. You just can't apply something generally over everything.

5. Amend State law and extend the noncompliance period from 21 to 30 days to give participants more time to establish “good cause” and avoid sanctions — pro and con views.

GSW 1: I think in order to prevent sanctions, we should extend the noncompliance period to 30 days, instead of 21 days. That will give us more chances to do more appointments for them. Also, to get rid of that third sanction instance because six months is too long of a period for a participant to be in a sanction.

GSW 2: I think the noncompliance situation is pretty good...I guess what I would say is not to talk to the participants in jargon...A lot of time they don't understand. Just be clear. I really want them to know, “Hey, you have so much time. Here are some partnerships available with job developers. Here are the services available.” Just get them to those basic things, and don't let them be so concerned about the process, and get them to do what we need for them to do...then they can see that, “He's just really trying to get me to go from one step to the next.”

GSW 3: You want more time to contact the participants, especially if your caseload is growing.

GSW 4: That's what we said in '98, too, when we had thirty days.

6. Some simple ways to reduce sanctions caused by faulty information and interface problems between LEADER (the CalWORKs computerized participant data base) and GEARS (the GAIN data base).

Increase GSW access to participant information on LEADER.

Why do only certain workers have access to the computer [LEADER]? I think it's ridiculous. It's not like we're going in there changing anything. It's a tool that we can use.

Make more LEADER computers available for the use of GSWs.

We're competing with clerks that are doing the verification of employment, and we're competing with people doing the time limits. We are competing with everyone to use two machines in the whole building.

7. Increase access and compliance by reducing the physical distance between CalWORKs, GAIN, and other participant services.

Staff and services should be under one roof:

Every county has over 30 different departments, but they don't work together. [It should be] one stop for the participant. When a participant comes in, the listed worker can see the participant, the GAIN worker can see the participant. Sometimes the participant has a problem, [and needs] to have time to talk to the

worker, and we understand that....The participant needs to call the listed worker to understand Medi-Cal, housing, everything. I think the worker is overloaded. They are human...How can they be polite? I think if GAIN and the other workers work under the same roof, it's more effective.

8. Listen to recommendations from GSWs, the front-line workers.

Facilitator: Do you ever have in your workplaces or with your supervisor this kind of discussion about compliance problems?

GSW: We do discuss it at meetings, but nothing gets done. Even if we were to complain directly to our director, it stops there, because she only has so much power. She can't change policies. She can't change programs. She is having her bosses handing stuff down for us to do. It stops there. ...I get tired of telling her about problems...There is only so much I can do. It has to come from State level, from Federal level.

Caveat: How to interpret these recommendations

Recommendations made by GSWs in two focus groups cannot be generalized to GSWs as a whole. However, some of the themes identified in the focus groups were echoed in the GSW survey and participant focus groups. In the focus groups, both GSWs and participants identified some of the same communication and administrative barriers to compliance, albeit from different perspectives. For example, participants knew that they sometimes got their noncompliance and appointment letters late; GSWs recognized this and explained that it could be attributed, in part, to problems in the interface of the GEARS and LEADER systems. Also, some of the communication and other issues mentioned in the focus groups were mentioned in the GSW survey. Areas of agreement and disagreement on these issues will be noted in the conclusions to this report.

Appendix E

CalWORKs Evaluation Advisory Group

The CalWORKs Evaluation Advisory Group was established to ensure that the Service Integration Branch/Research and Evaluation Services reflects the concerns of diverse communities and to advise the evaluation team on research topics and methods.

CalWORKs Evaluation Advisory Group Members

- Yolanda Arias, Directing Attorney, Legal Aid Foundation of Los Angeles, Government Benefits, East Community Office, Los Angeles
- Rosina M. Becerra, Ph.D., School of Public Policy and Social Research, Department of Social Welfare, University of California, Los Angeles
- Jacquelyn McCrosky, Ph.D., School of Social Work, University of Southern California, Los Angeles
- Kate Meiss, Senior Attorney, L.A. County Neighborhood Legal Services, Pacoima
- Paul Ong, Ph.D., Professor, School of Public Policy and Social Research, Professor, Asian American Studies, Director, Lewis Center for Regional Policy Studies, University of California, Los Angeles
- Leonard Schneiderman, Ph.D., Los Angeles County Commission on Public Social Services, Committee on Research and Evaluation, Department of Social Welfare, University of California, Los Angeles (Emeritus)

APPENDIX F

Glossary

Term	Actual Title	Definitions
AB 1542	The Thompson-Maddy-Ducheny-Ashburn California Welfare Reform Act of 1997	The bill, signed by Governor Pete Wilson on August 11, 1997, that created CalWORKs in California.
ACS	Affiliated Computer Services, Inc.	One of the three agencies DPSS contracts with to provide GAIN services in the community.
AFDC	Aid to Families with Dependent Children	Program started in the 1930s as Aid to Dependent Children, replaced under PRWORA with TANF.
Appraisal		A one-day GAIN program Orientation which begins with motivational training, and concludes with one-on-one interview with GSW. Participants who claim a substance abuse, mental health, or domestic violence problem are referred to clinical assessment.
ASH	Appeals and State Hearing	This is one of three methods a participant may select from to grieve their sanction. If a participant disagrees with the sanction, they may choose to file a County formal grievance as set by the Board of Supervisors. This hearing is conducted by DPSS' Appeals and State Hearing section.
CalWORKs	California Work Opportunity and Responsibility to Kids program	Provides temporary financial assistance and employment-focused services to families with minor children who may or may not have income, and their property limit is below State maximum limits for their family size.
CAO	Chief Administrative Office	The CAO develops recommendations on fiscal and policy matters for the Board of Supervisors, provides effective leadership of the County organization in carrying out the Board's policy decisions, and ensures financial stability.
CDSS	California State Department of Social Services	The State agency that oversees Social Services.
CW-7	CalWORKs Eligibility Form	CalWORKs participants submitted this form each month before it was replaced by the quarterly report form QR7.
DPSS	Department of Public Social Services	County of Los Angeles agency administering programs that provide services to individuals and families in need.
EDD	Employment Development Department	Manages California's Unemployment Insurance (UI) program records and monitors employment in the State.

Term	Actual Title	Definitions
EITC	Earned Income Tax Credit	The Earned Income Tax Credit (EITC), also known as the Earned Income Credit (EIC), provides a wage supplement to low-income working families and individuals. It is a refundable tax credit that offsets income taxes owed by low-income workers and, if the credit exceeds the amount of taxes owed, provides a lump sum payment to those who qualify.
Exemption		A GAIN participant who was granted an exemption from Welfare-to-Work activities. Such an exemption is granted if the participant is less than 18 years or 60 or more years old, mentally or physically incapacitated, pregnant, providing continuous care for an ill household member, or caring for a child under one year of age.
EW	Eligibility Worker	The Case Worker who determines CalWORKs, Medi-Cal, Food Stamps, and General Relief eligibility and issues these benefits..
FG	Family Group	A term DPSS uses to denote the receipt of CalWORKs benefits in a single parent household.
GAIN	Greater Avenues for Independence	County of Los Angeles Welfare-to-Work program.
GEARS	GAIN Employment and Activity Reporting System	Computer system used for tracking GAIN participants.
GSS	GAIN Services Supervisor	GAIN Services Supervisor
GSW	GAIN Services Worker	GAIN Services Worker
LEADER	Los Angeles Eligibility, Automated Determination, Evaluation and Reporting	Is the Los Angeles Eligibility, Automated Determination, Evaluation and Reporting System.
MAXIMUS, INC.		One of the three agencies DPSS contracts with to provide GAIN services in the community.
MDRC	Manpower Demonstration Research Corporation	Private non-profit organization that specializes in the evaluation of work-related social programs, especially those that include training.
Medi-Cal	Medical aid, also termed Medicaid in other states.	California's federally-funded Medicaid program. Provides health insurance to poor families and individuals. All CalWORKs families are eligible for Medi-Cal assistance.
NOA 840	Notice of Action 840	This is the first notice of action which informs the GAIN participant that their cash grant will be reduced or stopped (i.e., notifies them of a sanction).
PRWORA	Personal Responsibility and Work Opportunity Reconciliation Act of 1996	Federal Welfare Reform Act (PL 104-193).
QR7	Quarterly Report 7 Form	The form that replaced CW-7 in April 2003. This quarterly report submitted by GAIN participants show their income, family composition and any address change. Failure to submit this form results in termination of benefits.

Term	Actual Title	Definitions
RES	Research and Evaluation Services	RES is a unit within the CAO Service Integration Branch. RES is responsible for the evaluation of CalWORKs in the County of Los Angeles of which this report is a part.
RITE	Refugee/Immigrant Training and Employment	The Refugee/Immigrant Training and Employment program which serves non-English and non-Spanish speaking participants.
SIB	Service Integration Branch	Branch of the County of Los Angeles Chief Administrative Office created in 2000 to support and coordinate collaborative policy development initiatives; assist County departments integrate service delivery systems; and help provide children and families with needed information.
Specialized Supportive Services		These are supportive services for domestic violence, substance abuse and mental health.
State Fair Hearing		This is one of the methods a participant may select to grieve their sanction. If a participant disagrees with the sanction, they may choose to file a State Hearing, conducted by the California Administrative Law Judge.
TANF	Temporary Aid to Needy Families	Federal cash aid program with time limits and work requirements. It replaced AFDC in 1996.
U	Unemployed Parent	A term DPSS uses to denote the receipt of CalWORKs benefits in a two parent household in which one parent is unemployed.

References

- Allison, P. D. (1995). *Survival Analysis Using the SAS System: A Practical Guide*, Cary, NC: SAS Institute Inc.
- Allison, P. D. (1999). *Logistic Regression Using the SAS System: Theory and Application*, Cary, NC: SAS Institute Inc.
- Bloom, D. and Winstead, D. (2002). *Sanctions and Welfare Reform, Welfare Reform and Beyond #12*. Washington, D.C.: Brookings.
- Born, C., Caudill, P., and Cordero, M. (1999). *Life After Welfare: A Look at Sanctioned Families*. Baltimore, MD: School of Social Work, University of Maryland.
- Chi-Fang, W., et al. (2004). *How Do Welfare Sanctions Work?* Madison, WI: Institute for Research on Poverty, University of Wisconsin-Madison.
- Cherlin, A., et al. (2001). *Sanctions and Case Closings for Noncompliance: Who is Affected and Why*. Policy Brief. Baltimore, MD: Welfare, Children and Families: A Three-City Study. Johns Hopkins University.
- Edelhoch, M., Qiduan, L., and Martin, L. (1999). *The Post-Welfare Progress of Sanctioned Clients: A Study Using Administrative and Survey Data to Answer Three of Four Important Questions*. South Carolina: Department of Social Services, Office of Planning and Research.
- Fein, D.J., and Lee, S. W. (1999). *The ABC Evaluation: Carrying and Using the Stick: Financial Sanctions in Delaware's A Better Chance Program*. Prepared for the Delaware Health and Social Services. Cambridge, MA: Abt Associates Inc.
- Hasenfeld, Y., Ghose, T.J., and Hillesland-Larson, K. (2002). *At Risk of Being Sanctioned: Comparing Sanctioned and Non-Sanctioned Welfare Recipients in California's CalWORKs*. Prepared for the 24th Annual Research Conference of the Association for Public Policy Analysis and Management, Dallas TX. Los Angeles, CA: UCLA, Department of Social Welfare, School of Public Policy and Social Research.
- Hofferth, S., Stanhope, S., and Mullan Harris, K. (2000). *Exiting Welfare in the 1990s: Did Public Policy Influence Recipients' Behavior?* Ann Arbor, MI: Population Studies Center at the Institute for Social Research, University of Michigan.
- Holcomb, P., and Ratcliffe, C. (2000). *When Welfare Recipients Fail to Comply with Work Requirements: Indiana's Experience with Partial Benefit Sanctions*. *Journal of Applied Social Sciences*, volume 24, no.1.
- Hosmer, D. W. and Lemeshow, S. (1999). *Applied Survival Analysis: Regression Modeling of Time to Event Data*. New York, John Wiley & Sons.
- Hosmer, D. W. and Lemeshow, S. (2000). *Applied Logistic Regression (Second Edition)*. New York, John Wiley & Sons.
- Kalil, A., Seefeldt, K.S., and Wang, H. (2002). *Sanctions and Material Hardship Under TANF*. *Social Service Review*, 76(4).
- Kaplan, J. (1999). *The Use of Sanctions Under TANF*. *Welfare Information Network*, Vol. 3, No. 3.
- Koralek, R., (2000). *South Carolina Family Independence Program Process Evaluation*. Prepared for the South Carolina Department of Social Services. Washington, D.C.: The Urban Institute.

Long, J. S. (1997). *Regression Models for Categorical and Limited Dependent Variables*. Sage Publication, Thousand Oaks.

Los Angeles GAIN Program Handbook (1999). Department of Public Social Services. *L.A. GAIN Program Handbook*. Section 1321.3 and 1321.4.

MaCurdy, T., Mancuso, D.C., and Strain, M., O., (2002). *Does California's Welfare Policy Explain the Slower Decline of its Caseload?* San Francisco, CA: Public Policy Institute of California.

Mancuso, D., and Lindler, V. L., (2001). *Examining the Circumstances of Welfare Leavers and Sanctioned Families in Sonoma County*. Final Report. Burlingame, CA: The Sphere Institute.

Mead, L., M. (2000). *Governmental Quality and Welfare Reform*. Paper presented at the 2000 Annual Meeting of the American Political Science Association. Washington, D.C.

Moreno, M. H., Lichter, M., Burr, B., Eisenberg, N., Gonzalez, E., Horton, J., Joshi, V., and Shaw. L. (2002). *A Window on Welfare Reform: Early Impacts on Families and Communities in Los Angeles County*. County of Los Angeles, Chief Administrative Office, Service Integration Branch, CalWORKs Evaluation Services.

Pavetti et al. (2004). *The Use of TANF Work-Oriented Sanctions in Illinois, New Jersey, and South Carolina*. Final Report. Washington, D.C.: Mathematica Policy Research, Inc.

Pavetti, L., Derr, M.K., and Hesketh, H. (2003). *Review of Sanction Policies and Research Studies: Final Literature Review*. Washington, D.C.: Mathematica Policy Research, Inc.

Rector, R., E., and Youssef, S.E. (1999). *The Determinants of Welfare Caseload Decline*. Washington, D.C.: The Heritage Foundation.

Reichman, N., E., Teitler, J.O., and Curtis, M.A. (2003). *Hardships Among Sanctioned Leavers, Non-Sanctioned Leavers, and TANF Stayers*. Working Paper #03-17-FF. Princeton, N.J.: Princeton University; Center for Research on Child Wellbeing.

The State Manual of Policies and Procedures is available from the State of California, Department of Social Services, Office of Regulations Development, 744 "P" Street, Mail Station 7-192, Sacramento, CA 95814-6413 or at the State of California, Department of Social Services website at: http://www.dss.cahwnet.gov/ord/CDSSManual_240.htm

Unemployment Insurance (UI) Code is available on the State of California, California Unemployment Insurance Appeals Board website at: <http://www.cuiab.state.ca.us/precedentdecisions.shtml>

United States General Accounting Office (GAO) (2000). *State Sanction Policies and Number of Families Affected*. Washington, D.C.

Westra, K. and Routely, J. (January 2000). *Arizona Cash Assistance Exit Study, First Quarter 1998 Cohort*. Arizona Department of Economic Security.

Wu. C.F., Cancian, M., Meyer, R.D., and Wallace G. (2004). *How do Welfare Sanctions Work?* Institute of Research on Poverty, University of Wisconsin, Madison.