

Department of Health and Human Services

**OFFICE OF
INSPECTOR GENERAL**

**JOBS MONITORING AND
TECHNICAL ASSISTANCE:**

**States' and ACF Regional Offices'
Perspectives**



**JUNE GIBBS BROWN
Inspector General**

**APRIL 1994
OEI-07-92-00381**

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EXECUTIVE SUMMARY

PURPOSE

To provide an assessment of the Administration for Children and Families' (ACF) monitoring and technical assistance activities for the Job Opportunities and Basic Skills Training (JOBS) program based on the perspectives of States and ACF regional offices.

BACKGROUND

The Family Support Act of 1988 established the JOBS program for recipients of Aid to Families with Dependent Children (AFDC) payments. This program is designed to assist welfare recipients to become self-sufficient through training, education, work experience, and support services. The ACF administers the JOBS program through its Headquarters and 10 regional offices. In this role, they monitor and provide technical assistance to States.

We reviewed ACF's monitoring and technical assistance activities for the JOBS program in three phases. First, we examined ACF Headquarters' activities. Then we contacted ACF regional office staff and representatives of 10 States to obtain their perspectives and other information about their operations. The report on Headquarters' activities "JOBS Monitoring and Technical Assistance: Headquarters Role," (OEI-07-92-00380) was issued August 1993. This report contains a synthesis of regional office and State perspectives.

FINDINGS

Since completing our Headquarters report we note substantial progress in some areas such as timely release of field review guides. States were also complimentary about contributions made by ACF regional office specialists. However, additional improvements are needed, particularly in the areas of technical assistance and management information. We hope this report will be useful to ACF in preparing their response as well as their implementation plan for all of the recommendations previously made. Following is a summary of our findings.

Monitoring - Release of field review guides to regions has been more timely, which has assisted them in their work planning activities. However, the regions' diverse methods for sharing field review information has had an adverse impact on its usefulness to States.

States consider on-site visits to be useful, although they prefer that the visits be better structured. They consider the regional office State specialist position beneficial. Both States and the regional offices feel these specialists need to visit States more frequently to keep abreast of what is going on in their JOBS programs.

Technical Assistance - Many States believe ACF is not meeting their technical assistance needs. Conversely, Headquarters and the regions believe they are attempting to meet

most of them. The States prefer establishment of "technology transfer" over the use of technical assistance contractors. Neither the regions nor the States considered the technical assistance provided by the contractors to be very useful.

Program Guidance - States believe the regions are generally responsive to their policy questions, while Headquarters takes too long to respond. States need policy and operational instructions much earlier so they can implement their own policy and computer system changes in a timely manner.

Management Information - States question the usefulness of the data being collected since they receive little feedback from ACF on the analysis of this information. Neither the States nor the regions believe ACF is adequately validating the data.

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INTRODUCTION

PURPOSE

To provide an assessment of the Administration for Children and Families' (ACF) monitoring and technical assistance activities for the Job Opportunities and Basic Skills Training (JOBS) program based on the perspectives of States and ACF regional offices.

BACKGROUND

The Family Support Act of 1988 established the JOBS program for recipients of Aid to Families with Dependent Children (AFDC) payments. This program is designed to assist welfare recipients to become self-sufficient through training, education, work experience, and support services. The ACF administers the JOBS program through its Headquarters and 10 regional offices. In this role, they monitor and provide technical assistance to States.

METHODOLOGY

In recognition of the differing roles and responsibilities of ACF Headquarters and regional office components, we reviewed the JOBS program in three phases. We did this to more accurately reflect the overall performance of each component in providing monitoring and technical assistance for the JOBS program and to obtain the States' observations and perspectives concerning this performance.

In phase one, we reviewed the statute, written policies, processes, and products developed by ACF Headquarters for monitoring and providing technical assistance in the JOBS program. We conducted an on-site visit at ACF Headquarters and interviewed members of the agency's staff responsible for the following key areas: field reviews, on-site visits, State plans, data collection, and the technical assistance contract. We also interviewed members of Washington, D.C.-based advocacy organizations that have an active interest in the JOBS program. The results are presented in our report entitled "JOBS Monitoring and Technical Assistance: Headquarters Role," (OEI-07-92-00380) issued August 1993.

In phase two, (Regional Offices' Perspectives), we examined ACF's program instructions and regional offices' documentation, including policies, directives, memoranda, telephone contacts, on-site visit reports, States' report summaries, and other instructions used in the region or disseminated to States. We interviewed management and operational staff in the 10 regional offices that administer the JOBS program.

In phase three, (States' Perspectives), we examined States' program documentation, including regional policies, directives, memoranda, telephone contacts, on-site visit reports, program report summaries, and other materials used by them or created to summarize their JOBS program activities. We interviewed program staff in 10 States, 9 of which were selected because they are the State in which the ACF regional office is

located. In Region VII, Kansas City, we selected Nebraska, since we had previously contacted Missouri as part of our preinspection research.

Upon completion of the Headquarters' review, ACF requested that we delay action on our report findings and recommendations related to monitoring activities until we had completed our review of the regional offices and States. We agreed. We have now completed the remaining phases of the study. This report contains the synthesis of what we found, as well as the Regional offices' and States' perspectives of ACF's monitoring and technical assistance efforts.

We conducted our review in accordance with the *Quality Standards for Inspections* issued by the President's Council on Integrity and Efficiency.

FINDINGS

We are providing here a synthesis of our findings covering the regional offices' and States' perspectives concerning ACF's monitoring, technical assistance, program guidance and management information activities. More in-depth information is contained in the Appendices A and B of this report.

MONITORING

Field Review Guides

The ACF regional offices noted great improvement in the release of the 1993 and 1994 field review guides as compared to earlier years. However, they prefer that Headquarters release the guides even earlier.

Seven offices would like to receive these guides in the first quarter of the fiscal year. The remainder would prefer to receive the guides before the start of the fiscal year, preferably in July or August. All regions believe that releasing the guides earlier would assist them in their work planning and strategic planning process.

Field Review Reports

For many States, ACF regional office diversity in methods for sharing field review information has adversely impacted on the timeliness and usefulness of this material.

States report that regional offices use diverse methods for releasing field review reports, for soliciting their comments, and for following up on their corrective actions to report findings and recommendations. Our review of ACF Headquarters supports that it has not established national guidelines for the dissemination of reports, for soliciting States comments, and for conducting follow-up. The review of regional offices also confirmed that they have diverse methodologies for carrying out these functions.

On-site Visits

Most States found the regional office on-site visits to be beneficial. However, they prefer that these visits be more systematically planned and be conducted more frequently.

Both States and regional offices consider on-site visits a useful tool for monitoring, for offering assistance to States, for follow-up, and for educating their staff. States also see these visits as valuable in establishing good working relationships with the regional office staff.

The frequency of these visits varies, due mainly to limited funding and the distance from the regional offices to the States' capitals. States prefer more regular and frequent visits.

Regional Office State Specialist

Many regions and States consider the regional office State specialist position as vital to ensure good relations.

All regional offices have assigned State specialists who are the primary contact with the States. They consider the specialists to be field-oriented positions. Further, they believe that the specialists need to be out in the States to know what is going on in the JOBS programs.

TECHNICAL ASSISTANCE

Technical Assistance Needs

Some States believe that ACF is not consistently meeting their technical assistance needs.

Six States believe that their technical assistance needs are not being met or are only somewhat being met by ACF Headquarters and regional offices. The remaining four States believed that ACF was meeting their technical assistance needs. ACF Headquarters believes they are attempting to meet most of the States' technical assistance needs, primarily through the training and materials provided by the technical assistance contractors. Most regional offices also believe they are attempting to satisfy most of the States' needs and consider themselves to be the primary source for providing this assistance.

Technical Assistance Contractor

Regional offices and States believe that the technical assistance contractors' training was not useful.

All regional offices and seven States stated that the technical assistance contractors' training was not useful. Nine States favor the use of "technology transfer" to meet their training needs. This method provides partial Federal funding to facilitate cross-State training with States that are using innovative and successful program approaches. We found in the Headquarters' review that the full potential of the technical assistance contractors was not realized. All regional offices commented that the contractors' training was not timely or appropriate for States' needs.

PROGRAM GUIDANCE

Most States believe that the regional offices are responsive to policy questions. However, they believe that problems remain with the timeliness of Headquarters' responses and in the release and timing for regional office interim responses.

All regions believe that Headquarters' responsiveness to policy issues is problematic, particularly as related to providing interim status updates for these issues. While most regions provide timely responses to States' questions, they vary in the method and timing for release of interim responses, especially for issues submitted to Headquarters for their review.

Most States believe that ACF has not issued action transmittals timely. As a result, States do not have adequate time to implement the needed policy and computer system changes.

In the Headquarters' review, we found that ACF did not allow sufficient lead time for States' implementation of action transmittals, particularly those related to computer systems and data reporting. In some cases, States were required to retroactively capture and report data.

Regional offices noted that Headquarters' program instructions are improving. However, they believe that instructions related to data collection and some policy areas need to be released earlier to allow States time to plan and implement the changes.

MANAGEMENT INFORMATION

All regional offices and States commented that they receive little feedback from ACF Headquarters on the analysis of States' data. Therefore, they question the usefulness of the data being collected.

Most regions believe they are not adequately validating States' data and computer systems for accuracy and consistency. Although validation of data is required as part of the field review process, most regions believe that efforts to do so are not adequate. In addition, both regions and States commented that ACF has not routinely disseminated management information in a useful format to those who need it.

Most regions are adopting varied and innovative approaches for data analysis to enhance their monitoring, technical assistance, and consultative functions with States. However, they believe that lack of Headquarters' guidance, access to data, and standardization of analysis techniques is impeding their efforts.

CONCLUSIONS

As noted earlier, ACF asked if they could delay responding to the monitoring section of our Headquarters' report until we completed our review of regional offices and States. We agreed.

Now that our activities are concluded, we are pleased to note that real progress has been made in some areas, particularly in the more timely release of field review guides and protocols. Nevertheless, our State and regional respondents confirm the need for additional improvements. We therefore look forward to ACF's response to the earlier findings and recommendations on monitoring, which were published in our report on Headquarters activities. We hope these reports will be useful to ACF in preparing their response as well as their implementation plan for all of the recommendations previously made.

Our respondents have also raised concerns about additional matters, particularly related to technical assistance and management information. We hope ACF will address these concerns as well in their response.

APPENDIX A

PERSPECTIVES OF STATE OFFICIALS

The following is a catalogue of the perspectives and observations of staff from 10 States' staffs who are involved in the operation and administration of the JOBS program. We summarized the States' comments to reflect the general tone of the issues voiced during our review.

MONITORING

FIELD REVIEWS

States believe that field report information is of maximum usefulness when it is disseminated no later than 90 days following the review. They experience difficulty in developing and implementing corrective action plans when report recommendations are not issued in a timely manner.

States described the varied processes ACF uses to share the results of field review activity. These methods are shown in Table 1.

Table 1

Method of sharing draft report findings and recommendations with States

Method used	Number of States
Informal sharing of findings and recommendations--no draft report disseminated	2
Draft report disseminated	5
No informal sharing--no draft report disseminated	3

All States confirmed that regional offices are routinely conducting exit conferences at the conclusion of the field review. Nevertheless, they believe that delays in disseminating field review reports adversely affects their ability to utilize the information to improve the operation of the JOBS program. This is particularly true where expenditures of States' funds are involved and where they disagree with the information provided during the exit conference. The elapsed times for States' receipt of these reports are shown in Table 2 for Fiscal Years (FY's) 1990 - 1992.

Table 2

**Elapsed time from the field review to
States' receipt of the report
for FY's 1990 - 1992**

Elapsed time from the field review	Number of States
3 months or less	5
6 - 12 months	2
Over 1 year	3

To be of maximum usefulness, all States favor report findings and recommendations be shared as part of an exit conference which is followed by a written report that is distributed no later than 90 days following the review. States' preference for receipt of these reports are shown in Table 3.

Table 3

**States' preference for receipt
of the field review report**

Elapsed time from the field review	Number of States
Within 30 days	3
Within 60 days	3
Within 90 days	4

States report that regional offices use varied methods to disseminate field review reports. In addition, States note that regional offices differ in the methods used to obtain their comments to draft and final reports (see Table 4).

Table 4

Methods for obtaining States' comments to field review reports

Draft report methods used	Number of States
Informal sharing of findings and recommendations through a visit or a telephone call--no formal comment period. ¹	2
Comment period provided ²	5
No informal sharing--no comment period provided.	3
Final report methods used	Number of States
Comment period provided ^{1 2}	9
No informal sharing--no comment period provided.	1

¹ Two regional offices do not formally solicit States' comments to the draft report, but do provide a formal comment period for the final report.

² Five regional offices provide comment periods for both draft and final reports.

States report a variance in regional offices' notification of issues needing corrective action and their follow-up activity. While eight States believe that regional offices responses to their corrective action plans are good, the remaining two States are not notified of items needing corrective action and have not been involved in regional office follow-up activities.

ON-SITE VISITS

Most States believe that on-site visits by regional office staff are beneficial. While all States receive these visits, the frequency varies.

States reported a variance in the frequency of regional office on-site visits as shown in Table 5. All States receive at least one annual visit, while some receive more than four visits per year, in addition to scheduled field reviews.

Table 5

Frequency of regional office on-site visits

Frequency	Number of States
4 or more visits per year ¹	6
2 visits per year	1
1 visit per year	3

¹ These States are located in proximity to the regional office. However, we found that regions travel to remote portions of these States and to other States less frequently due to limited travel funds.

Eight States consider regional on-site visits to be beneficial. All of these receive either formal or informal feedback summarizing on-site visit issues.

REGIONAL OFFICE STATE SPECIALIST

Many States consider the regional office State specialist position as vital to ensure good relations.

Six States rated the State specialist as effective, while three States characterized the specialist as improving. Only one State considered the specialist to be ineffective.

States that rated their specialist as effective or improving listed the following traits as desirable for a good State specialist:

- openness
- helpfulness
- accessibility
- responsiveness
- knowledgeable about the State's program
- serves as an information resource
- sometimes acts as the State's advocate

Only one State rated the State specialist as ineffective. This State received only one on-site visit per year (Table 5). They commented that the specialist's visits were not well planned and he did not provide visit summaries.

TECHNICAL ASSISTANCE

TECHNICAL ASSISTANCE NEEDS

Some States perceive that ACF is not consistently meeting their technical assistance needs.

Six States believed that their technical assistance needs are not being met or are only somewhat being met by ACF Headquarters and regional offices. The remaining four States believed that ACF was meeting their technical assistance needs.

TECHNICAL ASSISTANCE CONTRACTOR

Many States believe that the technical assistance contractor training was not useful.

Seven States asserted that the contractor training was not useful or practical for their program. Several commented that the major benefit from the technical assistance conferences (workshops) was the ability to informally discuss issues (network) with staff from other States.

Most States favor use of "technology transfer" rather than a technical assistance contract to meet their training needs.

Nine States commented that they would like ACF to establish and fund a "technology transfer" among States. This concept, which previously existed under AFDC, enabled State staffs to travel to other States having the expertise to meet their specific training needs.

The one State not supporting this concept expressed concern about limited State funds available to pay for interstate training. In addition, they were concerned about the loss of their employees' services during the training period.

Most States believe that regional offices are responsive to their policy questions. However, they believe that problems remain with the timeliness of Headquarters' responses and in the release and timing for regional office interim responses.

Nine States commented that regional offices are responsive to their policy needs. However, six of these States believe that Headquarters has not provided timely responses to their questions, many of which had far reaching policy or budget implications.

Nine States commented that the ideal regional office's response time for a policy question is 30 days or less. The remaining State felt that a response within 60 days would meet its needs. Seven commented that the ideal Headquarters' response time for a policy question was 60 days or less. Four of these would prefer a response within 30 days or less.

Five States provided the following examples of delayed Headquarters' responsiveness to policy issues:

- A question regarding work supplementation. Submitted in the Fall of 1992, they received an answer in June 1993 (no interim response issued by the regional office).
- A question concerning the use of Housing and Urban Development funding for Community Development Block Grants as Federal matching funds for JOBS--the response took seven months.
- A question on whether unemployed parents and 16 - 17 year old AFDC youth can be included in the definition and calculation of target groups. The State submitted the question in March 1992, no response received (as of July 1993).
- A request to change the definition of a target group from being on assistance 36 out of the last 60 months to being on assistance 24 out of the last 60 months. The request was submitted in September 1990. They received the response in July 1992. The State expressed some displeasure with the lateness of an answer, since the issue had an impact on State budget and policy.
- A question concerning whether the JOBS program can pay for child care in facilities that provide religious instruction was submitted in 1988. The State has not received a formal written response from Headquarters. While they did get an informal (verbal) response from the regional office, the State does not consider this to be an official answer to their question.

PROGRAM GUIDANCE

Most States believe that ACF has not issued action transmittals in a timely manner to allow them adequate time to implement the needed policy and computer system changes.

Nine States commented that action transmittals, particularly in the area of data reporting, have not been released with enough lead time to allow States to implement the needed changes to policy and computer systems. They believe that problems remain, particularly as related to the issuance of policy on the changes to the unemployed parent program which was effective on October 1, 1993. As of November 1993, States had not received final policies and reporting instructions for these changes.

States vary widely in the amount of advance notice needed to implement policy changes. They commented that they need adequate advance notification to plan and implement these changes, to train staff, and to issue their policy and regulations. States' preferences for this notification are shown in Table 6.

Table 6

**States' preference for advance notification
of policy changes**

Time frame	Number of States
2 months	1
3 months	1
6 months	4
9 months	1
Over 1 year	2
Depends on the nature and extent of the change	1

States also vary widely in the amount of advance notice needed to implement computer system changes. They commented that they need adequate advance notification to plan, implement these changes, and to train staff. Their preferences for this notification are shown in Table 7.

Table 7

**States' preferences for advance notification
of computer changes**

Time frame	Number of States
2 months ¹	1
3 months	3
6 months ²	1
9 months	1
12 months ^{1 2}	2
Over 1 year	3
Depends on the nature and extent of the change	1

¹ This State believed that two months was adequate for minor changes but that 12 months would be needed for major changes. The State is listed for both time frames.

² This State believed that six months was adequate for minor changes but that 12 months would be needed for major changes. The State is listed for both time frames.

MANAGEMENT INFORMATION

All States commented that they receive little feedback from ACF on the analysis of States' data. They question the usefulness of the data being collected.

None of the States are receiving analysis of data beyond the recipient participation and target group rates. They have not received an ACF analysis of the JOBS Program Participant Data Collection Form FSA-108 data.

APPENDIX B

PERSPECTIVES OF ACF REGIONAL OFFICES

The following is a catalogue of the perspectives and observations of staff from 10 ACF regional offices who are involved in the administration and oversight of the JOBS program. We summarized the regional office comments to reflect the general tone of the issues voiced during our review.

MONITORING

FIELD REVIEW GUIDES

The regional offices noted great improvement in the release of the 1993 and 1994 field review guides as compared to earlier years. However, they prefer that Headquarters release the guides even earlier. Most offices would like to receive these guides in the first quarter of the fiscal year.

The regions received the final review guides for FYs 1992, 1993, and 1994 in June 1992, February 1993, and October 1993, respectively. The regions noted that the 1994 guides were essentially a reissuance of the 1993 documents. Most believe that the timing for the guide release has improved considerably over this three year period. Table 1 summarizes regional offices' responses concerning the impact of the 1992 and 1993 guides on their office operations.

Table 1

Impact of the release of the 1992 and 1993 guides on regional office operations

Response	Number of regions	
	FY 1992	FY 1993
Adverse impact	7	2
No adverse impact	2	8
New staff not involved in FY 1992 review	1	-

Regions reporting an adverse impact commented that the late release of these guides resulted in delaying field reviews until the last three months of the fiscal year. This created a burden for them in terms of workload and a time "crunch" for completing the reviews during the year. Several regions noted that guides should be released before the fiscal year or in the first quarter of the fiscal year as shown in Table 2.

Table 2

Regional offices' ideal time frames for receipt of field review guides

Time frame	Number of regions
Before start of the fiscal year ¹	3
In the first quarter of the fiscal year ²	7

¹ Three regions prefer to receive the guides before the start of the fiscal year, preferably in July or August.

² Three of these regions would like to have a working draft of the guide by August or September

All regions believe that releasing the guides earlier would assist them in their work planning as well as their strategic planning process.

FIELD REVIEW REPORTS

The regions use different methods to share report information with States and to obtain comments on draft and final reports.

Table 3 summarizes the various methods used to disseminate this information.

Table 3

Methods of sharing report findings and recommendations with States

Methods used	Number of regions
Informal sharing of findings and recommendations--no draft report disseminated	2
Draft reports disseminated	5
No informal sharing--no draft report disseminated	3

Regions also report using diverse methods to obtain States' comments on draft and final reports. This is shown in Table 4.

Table 4

Methods for obtaining States' comments on field review reports

Draft report methods used	Number of regions
Informal sharing of findings and recommendations through a visit or a telephone call--no formal comment period ¹	2
Comment period provided ²	5
No comment period provided	3
Final report methods used	Number of regions
Comment period provided ^{1 2}	9
No comment period provided	1

¹ Two regional offices do not formally solicit States' comments to the draft report, but do provide a formal comment period for the final report.

² Five regional offices provide comment periods for both the draft and the final reports.

ON-SITE VISITS

All regions consider on-site visits to be a useful tool for monitoring, offering assistance to States, for follow-up, and for educating their staff.

The frequency of regional office on-site visits varies, due mainly to limited funding and distances from the regional offices to the States' capitals. Table 5 provides a summary of the frequency of these visits.

Table 5

Frequency of annual on-site visits

Number of regional offices	Frequency of visits to "close States" ¹	Frequency of visits to "distant States" ²
1	Weekly to Monthly	Less than annual
1	Bimonthly	N/A
1	Bimonthly	Less than annual
2	Quarterly	Quarterly
1	Quarterly	Semiannually
1	Quarterly	None performed
1	Three to five	Three to five
2	Annually	Less than annual

¹ "Close States" are defined as being within one days travel, no overnight stay required to conduct a visit.

² "Distant States" are defined as requiring an overnight stay by regional office staff to conduct a visit. An N/A designates that the region(s) have no States where an overnight stay would be required.

REGIONAL OFFICE STATE SPECIALIST

All regional offices have assigned State specialists who are the primary contact with the States for the JOBS program. They consider the specialists to be field-oriented positions.

The regional offices believe that the specialists have to be out in their States to know what is going on in the JOBS programs. Regions commented that limited travel funds are impeding specialists from making periodic visits during the year.

TECHNICAL ASSISTANCE

TECHNICAL ASSISTANCE NEEDS

Regional offices commented that they are the primary source for addressing States' technical assistance needs. Eight out of ten believe they are addressing these needs. The remaining regions are not providing technical assistance.

Regional offices believe that technical assistance is an important activity. The primary sources of information for six of the regions are field reviews and staff contacts. The other four regions found that surveys of States and staff contacts are the most useful for them in identifying technical assistance needs.

Despite regional offices' efforts, they believe that States continue to have significant technical assistance needs (see Table 6).

Table 6

Regional office views regarding States' technical assistance needs

Technical assistance needs	Number of regions ¹
Understanding legislation, regulations and policy	6
Data collection/reporting	4
Goal setting and component effectiveness	3
Unemployed parents program	3
Computer systems development	2
Facilitating the exchange of information with other States	2
Participation rates, target groups, and teen parents	2
Simplifying funding streams/budget issues	2
Better coordination among Federal agencies	1
Child care issues	1
Market rate survey	1
Orientation of new States' JOBS program managers	1
Writing a good contract	1

¹ All regional offices listed multiple technical assistance needs

Examples of how regions are providing or sponsoring technical assistance to States

- One region assisted a State whose legislature wanted information on the effectiveness of jobs search as a component of the JOBS program. The region obtained a study that showed job search was cost effective over the short term. However, it was not as effective as education and training programs over the long term.
- Through its monitoring effort, one region brought State JOBS directors and ACF Headquarters' staff together. The ACF staff provided definitions for terms used in data collection.
- One region's planning process will identify five items the individual States need in the coming year. Some of these are common to other States in the region. Others will be specific to individual States.

TECHNICAL ASSISTANCE CONTRACTOR

All regions reported that the contractors' assistance to States during program implementation was not timely or appropriate. Only three judged the technical assistance contractors' training materials and workshops as being useful to States.

All regions are concerned with Headquarters' response times to States' policy questions.

Regions report a wide variance in the timeliness of Headquarters' responses to States' policy questions as shown in Table 7.

Table 7

**Regions reporting of Headquarters' response times
for States' policy questions**

Response time ranges	Number of regions
30 days to several months	3
30 to 45 days	1
60 days or less	1
90 days	1
90 to 120 days	1
4 to 6 weeks	1
4 to 6 months	1
4 to 8 months	1

A majority of the regions generally prefer a 30 day time frame as the outside limit for a response from Headquarters (see Table 8).

Table 8

**Regions' preference for Headquarters' response times
to States' policy questions**

Response times	Number of regions
Not to exceed 30 days ¹	7
30 to 60 days	2
45 to 60 days (closer to 45 days)	1

¹ One region commented that a continuing dialogue (no time expressed) is needed between the region and Headquarters if the response will take a relatively long time.

Regions report use of diverse methods and time frames for releasing interim responses to questions from States.

The regions vary in the methods and timing for providing interim responses to States (see Table 9).

Table 9

Methods and time frames for issuing interim responses

Method	Number of regions
Interim response if final reply will take a long time (period not defined)	4
Interim response by telephone when referred to Headquarters, no subsequent reply will be issued	1
Interim responses every 30 days	1
Respond verbally or in writing (period not defined)	1
Periodic telephone follow-up with Headquarters and furnish update to State (period not defined)	2
30 day telephone follow-up with Headquarters and furnish update to State	1

PROGRAM GUIDANCE

All regions believe that Headquarters' program instructions are improving. However, material related to data collection and some policy areas could be more timely.

Five regions commented that the lack of timeliness of instructions pertaining to data reporting and systems resulted in States having to collect and report the information retroactively. States agreed that these instructional delays made it difficult, if not impossible, to collect and report the needed information since their information systems were not set up to capture this data.

MANAGEMENT INFORMATION

Most regions believe they are not adequately validating States' data and computer systems for accuracy and consistency, despite the required validation performed as part of the field review process.

All regions are validating the data on the JOBS Program Participant Data Collection Form FSA-108, which is a requirement under the field review process. However, seven regions believed that this validation is not adequate to assure accurate State data.

Most regions report use of varied and innovative approaches for data analysis to enhance their monitoring, technical assistance and consultative functions with States. However, they believe that lack of Headquarters' guidance, access to data, and standardization of analysis techniques is impeding their efforts.

While eight regions are performing limited analysis of States' data, they believe this role is not adequately supported by ACF Headquarters. Nine regions believe that Headquarters should provide greater access to States' data, and assist them in its analysis.