

Statement for the September 8, 2011 Hearing Record

TANF Reauthorization: Improving Work and Other Welfare Reform Goals

**Submitted by
The National Association of County Human Services Administrators**

The National Association of County Human Services Administrators (NACHSA) welcomes this opportunity to submit a statement for the record on how to improve work and other welfare reform goals through a reauthorization of the Temporary Assistance for Needy Families (TANF) program.

Affiliated with the National Association of Counties (NACo), NACHSA is an association of county human services directors from across the nation. NACHSA provides county decision-makers with information they can use to help people in their communities access services that meet their unique needs and enhance the quality of their lives. The Association also assists counties in navigating the federal legislative and regulatory landscape to tackle challenges and opportunities in the human services arena.

In at least ten states, counties are responsible for administering the TANF program. Those states include some of the more populous ones, including California, Colorado, Minnesota, New York, North Carolina and Ohio. In others, such as Pennsylvania, counties administer some programs such as child welfare services. With this diversity in mind, NACHSA has worked with the county elected officials within NACo to develop a series of TANF reauthorization principles outlined in this statement.

Counties that administer TANF are proud of their TANF efforts. They have formed strong public-private partnerships, bringing together employers, community- and faith-based organizations and the other local and state agencies that serve our participants. These efforts were evident in implementing the TANF Emergency Contingency Fund (TANF-ECF) authorized by the American Recovery and Reinvestment Act. Of the 260,000 subsidized jobs for adults and summer youth funded by TANF-ECF, county-administered states worked with their local partners to provide over 70,000 subsidized jobs.

The TANF-ECF experience is the most recent example of how county staff roles have changed. We are focused on assisting clients in moving from welfare to work. The way in which we use our state and federal funding has shifted from a focus on cash aid to a focus on supportive services such as child care, transportation, and skills training. Instead of speaking of “entitlements,” we speak of “self-sufficiency.” From caseload reductions, to increases in work, to a decreasing reliance on cash aid, TANF has been a success.

The clients counties serve, however, often have multiple barriers before they are able to become self-sufficient. TANF participants often struggle due to poor education, limited skills,

little or no work history, behavioral health issues, domestic violence, disabilities, and involvement with other public systems such as child welfare and law enforcement. Despite those multiple challenges, many of these families are indeed engaged in work or other activities, but they participate less than the federally-required number of hours. Barriers for some of those families are so great that expecting 32, 35, or 40 hours of work from them, at least at certain points in time, is unrealistic.

Given the challenges faced by many in our caseloads, county administrators continue to struggle with administering a TANF program that is heavily focused on process rather than outcomes. The regulations include narrow definitions of work activities, add parents who have reached their statutory time limits on aid into states' work participation rate calculations, and implement process-heavy requirements for verifying and documenting participation.

County administrators are even more acutely aware of TANF's focus on process during the recession. Not only are many of them operating with reduced staff due to budget cuts at all levels, high unemployment rates compound the challenges of moving TANF participants into jobs. Additionally, families who have never needed human services assistance now find themselves requesting help. They still may not be income-eligible, but they have lost their job, face foreclosure on their home, have marketable skills but need temporary assistance, possible retraining, and supportive services to help them back into the workforce. County administrators also are responsible to their board of elected county officials who are under intense pressure to find even more budgetary savings as property tax revenues continue to decrease.

County human services directors see first-hand the successes and challenges of implementing TANF. Given that experience, NACHSA recommends that Congress consider the following policies when crafting a TANF reauthorization bill.

- **Give partial credit for partial participation.** Many recipients are participating for a portion of the required hours in federal activities. However, states and counties receive no credit for partially participating individuals. The efforts of states and counties to engage participants in as many hours as possible should be recognized and recorded.
- **Clarify and simplify the work verification and reporting requirements:** The documentation requirements for many of the allowable activities are an administrative burden and should be revised. Simpler methods exist, such as negative reporting systems in which participants are presumed to be engaged in their assigned activity unless the program supervisor reports otherwise.
- **Allow realistic participation in behavioral health activities.** Some substance abuse, mental health and domestic violence services can be counted toward job search/job readiness activities for up to 4 to 6 weeks. However, the rules essentially force states to count even one day of participation in these activities as an entire week. This strict interpretation is a significant barrier for individuals with substance abuse or other behavioral health problems. States and counties should be able to count 240 hours a year of these activities for each individual.
- **Allow partial participation for persons with disabilities.** States and counties should be allowed to count participation by individuals with disabilities based on the number of hours that their medical professionals deem appropriate for the individual, even if it is

below 30 hours a week. This is consistent with the Federal Rehabilitation Act and Americans with Disabilities Act.

- **Count job search, job readiness, basic skills and English as a second language as a component of any work activity:** Today's economy requires a well-trained workforce. Individuals with poor basic skills and poor English language skills will not be able to obtain meaningful employment. Counties, therefore, suggest that basic skills training, remedial education, and English as a Second Language count as job readiness activities and be an allowable component of vocational education. Job search and job readiness are critical components of self-sufficiency plans. The six-week restriction should apply only to stand-alone job search as a core activity. The limitation should not apply to job search and job readiness activities that are combined with other work preparation activities.
- **Do not penalize states that help children with a safety net.** A number of states, including California, have chosen to give a reduced grant to children whose parents reach their time limits on aid but still meet other eligibility requirements, including having income below a certain level. The HHS regulations include the parents of these children in states' work participation rates. Please do not put states in the position of having to decide whether to eliminate assistance for these vulnerable children.
- **Eliminate the Two Parent Work Participation Rate.** NACHSA urges Congress to eliminate the 90 percent two-parent work participation rate. It is unrealistic penalizes states and counties that are otherwise doing a good job of engaging participants.

NACHSA works closely with NACo to create their policy positions. Those TANF reauthorization policies include, but are not limited to, support for:

- Applying twenty-four months for vocational education to a higher percentage of the caseload;
- Allowing more than 10 hours a week of basic skills and education training to count as work activities and allowing these hours to count toward work participation rates;
- Removing teen parents from the 20 percent vocational education limit;
- Exempting relatives who are caring for a child who would otherwise be in foster care from the work requirements and the time limit;
- Exempting adults who are the primary caregivers of a disabled family member from the work requirements; and,
- Allowing a parent providing child care in a two-parent family to count toward the work requirement.

NACHSA appreciates the opportunity to submit this statement for the record. County administrators have first-hand experience in administering TANF and welcome any questions Subcommittee members may have on how to improve the program.

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