

April 22, 2025

The Honorable Jason Smith
Chairman
House Committee on Ways and Means
1011 Longworth HOB
Washington, DC 20515

The Honorable Richard Neal
Ranking Member
House Committee on Ways and Means
372 Cannon HOB
Washington, DC 20515

The Honorable Darin LaHood
Chairman
Subcommittee on Work and Welfare
503 Cannon HOB
Washington, DC 20515

The Honorable Danny Davis
Ranking Member
Subcommittee on Work and Welfare
2159 Rayburn HOB
Washington, DC 20515

Dear Chairman Smith, Ranking Member Neal, Subcommittee Chairman LaHood, and Ranking Member of the Subcommittee Davis,

On behalf of the American Public Human Services Association (APHSA), the bipartisan organization representing state, county, and city public human service agencies across the country and the Temporary Assistance for Needy Families (TANF) programs they administer, we appreciate the opportunity to comment on the April 8, 2025 House Ways and Means Work and Welfare Subcommittee hearing titled *Government Watchdog Findings: Temporary Assistance for Needy Families (TANF) Program In Need of Reform, Better State Accountability, and Fraud Protection*.

As both the Subcommittee Chairman and Ranking Member highlighted, TANF is a vital component of our country's human services system, and the American people deserve a cash assistance program that upholds integrity, builds public confidence, and delivers meaningful results that advance family economic mobility. To achieve this, TANF must include robust protections to ensure funds are spent as intended by Congress. At the same time, the program should remain flexible to allow states to use the funding to best meet the desired outcomes for the program—capable of providing both direct financial assistance and comprehensive supports that help families address individual challenges to employment and gain the skills and experience needed for stable, long-term careers that help move them toward self-sufficiency and off of government programs. Most importantly, rather than continuing to be extended in piecemeal fashion through appropriations, TANF must be funded at a level that enables states to provide meaningful assistance and supportive services aligned with other economic supports. ***As Subcommittee Chairman LaHood mentioned in his opening statement, we urge Congress to pursue comprehensive TANF reform through bipartisan reauthorization that indexes the program to inflation and improves accountability while protecting state flexibility to tailor services and supports to individuals and, wherever possible, disrupt intergenerational poverty.***

Additionally, we appreciate the hearing's emphasis on the importance of federal fraud prevention efforts to protect states and public benefit recipients from EBT theft. APHSA has worked extensively with our members on modernizing EBT to enhance security, increase trust, and significantly reduce risk of third-party fraud via card skimming. In 2022, when card skimming first began to reach the national stage, we surveyed our members and heard that 38% of responding TANF agencies (14 of 37) and 59% of SNAP agencies (24 of 41) had experienced increased stolen benefits via card skimming in the last year. In November 2024, we again surveyed SNAP agencies and learned that each of the 43 state respondents had taken measures to enhance security measures. Several continue to do more, such as transitioning to chip cards. In the absence of federal funding to replace these stolen benefits, a small number of states are using state budget dollars to replace benefits that were stolen due to no fault of the customer. ***To strengthen our public benefits programs, we urge Congress to support states in improving and modernizing EBT technology so that benefits will not be stolen in the first place, and using federal authority to replace stolen benefits as needed to ensure that TANF and SNAP clients are not the ones forced to bear the loss of critical assistance.***

As Roxane Somerlot, Director of Marion County Department of Job and Family Services in Marion County, Ohio, and Kathryn Larin, Director of Education, Workforce, and Income Security within the Government Accountability Office (GAO), underscored, states use their non-assistance TANF dollars to fund critical services and supports for families. APHSA has collected a few examples from our members, including that West Virginia is partnering with Good News Mountaineer Garage to provide cars to TANF families to aid their transportation to work; at the Oklahoma Community Workforce Hope Center, clients receive comprehensive co-located services including workforce opportunities, food benefits, energy assistance, behavioral health support, and legal aid; and Utah's Upward Mobility project supports participants' full-time, short-term training in high demand occupations and covers their rent and utility costs through the duration of their coursework. These innovations would not be possible without states' TANF allotments. ***States and localities rely on the critical flexibility of the TANF Program, and we urge Congress to invest in the TANF block grant at a level that will enable states to provide meaningful assistance and supportive services empowering participants to move into self-sufficiency.***

We value GAO's careful analysis of the TANF program and their recommendations to Congress and HHS, which provide promising steps to strengthen program integrity. We welcome opportunities to partner with the Subcommittee on opportunities to reduce waste, fraud, and abuse; increase public trust in TANF; and enhance positive outcomes from the program. ***Finally, we encourage the Subcommittee to review [APHSA's TANF Modernization Legislative Framework](#), which provides a roadmap for TANF reform modeled after state agency initiatives.***

As always, we welcome further discussions on reforming TANF. Please direct any follow-up to Lexie Kuznick, Director of Policy and Government Relations at akuznick@aphsa.org.

Sincerely,



Alexis Kuznick

Director of Policy and Government Relations
APHSA



Patara Horn

Chair, APHSA National Association of State
TANF Administrators

Core Principles for TANF Modernization: A Legislative Framework for TANF Reform

Revised April 2025

This year marks the 29th anniversary of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), establishing the Temporary Assistance for Needy Families (TANF) program. TANF provides millions of parents and caregivers with economic supports to help meet their basic needs; employment and training skills to earn family-sustaining wages; early childhood care that fosters development during children’s formative years; and services that prevent and mitigate childhood stress and trauma.

Over these past 29 years, we have learned much about what works—and what doesn’t—to help families succeed for the long-term and get to the root of barriers communities face to promote opportunity for all. As our nation faces unprecedented new challenges in response to the COVID-19 pandemic, we have simultaneously made bold new investments in the foundational supports we all rely on to thrive. TANF has the potential to catalyze and transform these investments into economic mobility for millions of Americans by working in true partnership with people to remove roadblocks to their economic and family well-being.

Working with TANF administrators and human services leaders across the country, the American Public Human Services Association (APHSA) embraces the call to reimagine how TANF can work in support of the families it serves and has established a set of TANF Modernization Core Principles to guide our vision for the future of TANF. Grounded in these Core Principles, APHSA’s members have laid out a legislative framework to unlock the potential of TANF. We call upon Congress to use this framework as a starting point to build common ground to achieve a TANF reauthorization that promotes a more equitable and prosperous future for all Americans.

Reimagining Family Engagement in TANF
page 5

Establishing Performance Measures
Focused on Outcomes
page 7

Moving TANF Upstream
Through Cross-Systems
Alignment
page 9

Updating TANF Funding and Resourcing
page 10

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Reimagining Family Engagement in TANF

VISION FOR TANF:

Families should be in the driver's seat of their own lives, co-creating plans with TANF agencies that support their family well-being and long-term economic mobility. Families should receive individualized assessments that are used to place them in customized activities that reflect their input and expertise. These plans should be reviewed and updated over time with participants and staff jointly evaluating progress as they work together to achieve agreed upon goals.

CONGRESS SHOULD:

> Establish a Framework for Customized Career and Family Success Plans

- Direct the Department of Health and Human Services (HHS) to establish common standards for states to develop individualized assessments for TANF participants that consider families' economic, social, emotional, and physical well-being.
- Direct states to co-create with TANF participants customized Career and Family Success Plans that put into action a plan to achieve mutually agreed upon goals based on individualized assessments.
- Use individualized assessments to measure progress towards goals and update Career and Family Success Plans bi-annually and as otherwise requested by TANF families.
- Require states to submit to HHS their methodology for conducting individualized assessments to develop Career and Family Success Plans (replacing the existing Work Verification Plan requirement) using state performance data, participant feedback, and social and economic indicators to inform changes and revisions.

> Use Career and Family Success Plans to Reimagine the Role of TANF Agencies to Support Pathways to Economic Mobility

- Replace arbitrary and convoluted Work Participation Rate (WPR) requirements and associated restrictions on countable hours and activities with economic mobility and child and family well-being components jointly identified with participants through their individualized Career and Family Success Plans.
 - Economic mobility activities may include education, training, and employment activities and/ or work readiness activities that help support successful entry and long-term success and growth in the workforce.
 - Child and family well-being activities may include services and resources that address children and caregivers' physical, behavioral, social, and emotional needs.
- Tailor economic mobility and child and family well-being activities to the specific needs of TANF participants and their families using a trauma-informed approach, accounting for families' participation in other economic mobility and child and family well-being programs and advancing a strategy towards family-sustaining wages.

- Require states to reassess and update, in consultation with TANF participants, Career and Family Success Plans, when participants are not meeting Plan requirements.
- Limit sanctioning of TANF participants to instances where individuals are not meeting Career and Family Success Plan requirements and proactive outreach has failed to reengage TANF participants in jointly reviewing and realigning their Success Plans with relevant and achievable goals and activities.
- Prohibit “full family” sanctions, fostering continued service provision and support that meet the needs of children in the home.

> **Provide a Minimum Five-Year Lifetime Limit for TANF Participation**

- As a condition of accepting the TANF block grant, states must provide a minimum five-year lifetime limit for TANF cash assistance.
- States should have discretion to propose through State Plans to increase their lifetime limit for TANF assistance beyond five years.



Establishing Performance Measures Focused on Outcomes

VISION FOR TANF:

TANF services should be centered in evidence of what works for families, informed by the perspectives, goals, and needs of individuals served. The success of TANF programs should be measured by their ability to achieve employment and economic well-being outcomes, as captured through progress towards and attainment of family-sustaining wages. Further, TANF programs should measure family stabilization outcomes that assess whether participants have the child and family supports they need to effectively pursue their career goals.

CONGRESS SHOULD:

> Establish Employment & Economic Well-Being Performance Measures Aligned with WIOA

- Direct HHS to establish TANF Employment and Economic Well-Being Measures that:
 - Align with WIOA measures of employment rates (Q2 and Q4), median earnings (Q2), and credential attainment rates (within 1 year) after exit, and measurable skills gains rates for program participants.
 - Are adapted to the specific characteristics of TANF participants, such as measuring skill gains and credential attainment that consider improvements in executive functioning and soft skills while participating in TANF.
 - Include a list of acceptable supplemental measures that consider whether TANF recipients are achieving long-term economic mobility or incremental progress towards removing barriers to economic mobility, which states may report on to be factored into determining whether they have met performance standards.
- Provide a three-year transition period for states to adopt new outcome-based performance measures, including grant funding and technical assistance to collect the data needed for performance reporting.
 - Establish state-specific TANF baselines using data on TANF participant employment and economic well-being outcomes in the three years prior to implementation of new outcome-based performance measures.
 - Fund pilots during the three-year transition period for states with existing capabilities to track and evaluate outcome measures.

> Establishing Federal Oversight to Assess Progress in State Performance Outcomes

- Direct HHS to develop criteria for acceptable employment and economic well-being outcomes based on states falling within an acceptable range of performance targets.
 - Metrics should include data that enable states to identify and track progress towards addressing disparities in outcomes among TANF participants.
- Permit states that fail to meet performance standards in a reporting period to establish a corrective action plan to avoid penalties, contingent on performance outcomes in the following reporting period.
- Require states under penalty to increase state Maintenance of Effort spending to improve performance outcomes rather than withhold a share of the TANF block grant.
- Direct HHS to determine aspirational thresholds for employment and economic well-being measures and establish a high-performance bonus structure that rewards states that reach aspirational thresholds and maintain high TANF penetration rates within eligible populations.
- Grant HHS discretion to waive penalties in exceptional circumstances.

> Establish Family Stabilization Metrics to Measure Child and Family Well-Being

- Direct HHS to establish acceptable state and/or county-level Family Stabilization Measures for assessing child and family well-being overall, prioritizing identifying and tracking progress towards addressing disparities in outcomes among TANF participants.
- Require states to identify within their State Plan which Family Stabilization Measures they will track. Measures selected should be informed by community assessments that include input from current or former TANF recipients.
- Provide a three-year transition period for states to adopt and implement Family Stabilization Measures.
- Direct HHS to offer technical assistance to states on establishing, measuring, and improving outcomes within Family Stabilization Measures.



Moving TANF Upstream Through Cross-Systems Alignment

VISION FOR TANF:

TANF must act as a bridge to create alignment with the constellation of programs and services critical to optimizing career and family well-being outcomes for people experiencing poverty.

CONGRESS SHOULD:

> Require States Spend at Minimum 50% of Federal TANF Funding Towards Core Activities

- Core activities include cash assistance, case management, and economic mobility and child and family well-being activities that are part of Career and Family Success Plans, as well as non-recurrent short-term benefits and family support/family preservation/reunification services.
 - Countable core activities may include activities included in a Career and Family Success Plan intended to support non-custodial parents, grandfamilies, and other non-traditional caregivers of TANF assistance in financially and socially supporting their families.
 - Countable core activities may include activities funded by TANF transfers to another program so long as they are part of a TANF assistance recipient's Career and Family Success Plan.
 - Provide a two-year transition period for states to come into compliance with core activities requirements.

> Require TANF Transfers to Demonstrate Coordination Across Programs

- Require states that choose to transfer TANF funds to CCDBG, SSBG, WIOA, or child welfare to document within State Plans how funds are being coordinated in pursuit of TANF goals through policy and system alignment, data sharing, referrals, shared metrics, and customer feedback.
- Direct HHS to develop a schedule for key reporting and administrative requirements that supports coordination with other major federal program planning and reporting schedules.

> Adequately Fund Mutually Supportive Systems to Work Effectively with TANF

- Ensure that systems aligned with TANF to help families achieve success, such as child welfare, child care, child support, and workforce development, are adequately funded, allowing states the ability to prioritize TANF funds towards core activities.

> Direct HHS to Evaluate Alignment of TANF Cash and Supportive Services with Aligned Economic Mobility and Child and Family Well-Being Programs

- Reserve funding to enhance research, technical assistance, and pilots that increase the evidence base on best practices and impacts of aligning TANF with child welfare prevention services, housing, WIOA, and WIOA one-stop partners.
- Expand the scope of the Pathways to Work Evidence Clearinghouse to warehouse evidence of what works in alignment with the full scope of TANF Career and Family Success Plans.

Updating TANF Funding and Resourcing

VISION FOR TANF:

TANF must be adequately resourced to invest in families' short-term stability and long-term economic mobility goals. States must be able to make investments in people and services in ways that mitigate benefit cliffs, clearing a path to economic mobility and supports healthy, thriving families. TANF must also be responsive in times of public health emergencies, natural disasters, and economic downturns; families must have adequate resources to weather the storm.

CONGRESS SHOULD:

> Invest in TANF's Potential to Align Benefits and Supportive Services to Help Families Out of Poverty

- Immediately increase the TANF block grant from 1995 spending levels to compensate for lost value due to inflation.
- Index future block grant levels to inflation to prevent future loss in value.

> Modify the Calculation of Individual State's Block Grant Levels to Reflect Current Need

- In conjunction with an increase to the TANF block grant and holding states harmless from a reduction to existing TANF state grant amounts, charge HHS to transition from the current state allocation formula that is based on outdated AFDC spending levels to reflect more equitable distribution across states based on current economic needs of families with children.

> Provide Cash Assistance, Paired with Career and Family Services, that Meets Families' Basic Needs to Support their Path Out of Poverty

- Require states to demonstrate how TANF benefits and services, in conjunction with other economic supports, provide TANF participants enrolled in Career and Family Success Plans with the resources needed to meet their basic needs while working towards career and family well-being goals.
- Grant authority for states to exempt TANF cash assistance from countable income for other means-tested programs when TANF benefits would result in benefit cliffs that reduce net wealth as TANF participants' earned income rises.
- Incentivize states to adopt and expand child support pass-through policies by fully waiving the federal share of child support collections for TANF cash assistance on passed-through child support payments.

> Limit States' TANF Reserves to 100% of Their Annual Block Grant

- Limit states' reserves of overall, unobligated TANF block grant funds at the end of each fiscal year to no more than 100% of the state's current fiscal year allocation of TANF funds.
- Allow States with current reserves above this threshold two fiscal years from the date of the policy change to obligate excess funds with an additional year to expend excess funds.

For inquiries or more information, contact Lexie Kuznick, Director of Policy and Government Relations at akuznick@aphsa.org.