

January 11, 2024

Ann Flagg
Director, Office of Family Assistance
U.S. Department of Health & Human Services
330 C Street, SW
Washington, DC 20201

Dear Director Flagg,

As the bipartisan membership association representing state and county human services agencies, the American Public Human Services Association (APHSA) elevates considerations and priorities about Sections 302 and 304 of the Fiscal Responsibility Act of 2023 (FRA) in response to OFA's Request For Information, Document Number 2023-26100.

Our members, specifically those of our National Association of State TANF Administrators (NASTA) affinity group, bring expertise of their agency operations administering and overseeing their state or county's TANF program. They work to align services and partnerships that build resilience and bolster family well-being through access to cash assistance, employment and training services, child care, food, health care, housing, child care, performance measurement and data analysis. Their direct experience administering TANF funds and TANF-funded services and supports informs our response on their behalf below. Additionally, our comments for section 4.0 related to work outcome measures draw upon areas of consensus raised by both workforce and human services administrators at the state-level during a series of cross-sector conversations jointly facilitated by APHSA and the National Association of State Workforce Agencies (NASWA).

While we separate our remarks by topic area, commenting first on 3.0 Pilot Program questions and subsequently on 4.0 Work Outcomes Measures questions, note that within each section we do not comment sequentially on each topic but rather share our comments in order of their priority to our membership.

We appreciate OFA's solicitation for feedback as you prepare regulations and guidance related to FRA. States have many operational questions they need answered in order to report timely information for FY 2025 and as they consider applying to participate in the pilot project. States are curious to understand better the process of applying for and requirements for participating in the pilot projects and how OFA will support states in the ramp up and wind down of the six-year pilot projects. Regarding the outcomes-based reporting, states have many questions about data-sharing agreements and partnering with their state's workforce agencies given the similarity between the TANF and WIOA performance indicators. We urge OFA to release timely guidance as states prepare for Sections 302 and 304 of the FRA to become effective on October 1, 2024.

Thank you for considering our feedback below and we look forward to continued engagement on this important matter. To discuss this response further, please contact Rebekah Sides, Policy Associate for Social and Economic Mobility, at rsides@aphsa.org.

Sincerely,

Matt Lyons



Senior Director, Policy and Practice
APHSA

Patara Horn



TANF Administrator, Wisconsin Department of
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Pilot Programs

3.4 - What indicators of family stability and well-being, including alternative measures related to employment, for families participating in TANF should we consider measuring as part of the pilot? For example, should pilots include measures related to family poverty, interactions with the child welfare system, or other indicators related to child well-being? Please explain your reasoning. What data source(s) would be of most utility in tracking your recommended indicators? For example, if a state is interested in measuring job quality as an indicator of family well-being, would a state be able to measure that by tracking jobs with benefits such as a paid leave or employer contribution retirement plans? Should family income be included as a measure of family stability and well-being and, if so, what are the important components, who should be included, and what would be the most reliable and practical sources of data? Should any indicators be measured for all low-income families, irrespective of TANF participation, to evaluate whether a state's TANF program is successfully serving these families (e.g., the share of families living in deep poverty, taking into account all sources of income)?

The FRA's family stability and well-being measures included as part of the pilot projects are an opportunity for states to measure stabilization indicators that look beyond a parents' employment status or job quality; we urge the Administration to allow states adequate flexibility to design indicators that directly align with the supports provided through their state's TANF program. We recommend OFA consider offering a menu of stability and well-being measures from which states can select, with the opportunity to adapt the measures based on the design of state-specific program activities and community needs. Some of these indicators may be quantitatively calculated through state or federal data sources whereas others may offer more qualitative understanding of a TANF participant's experience and sense of well-being. Depending on the size and design of their TANF program, some states may choose to experiment with some self-report measures for several indicators, bearing in mind that states may be interested in triangulating qualitative and quantitative data to gather a fuller picture of families' stability and well-being. In looking holistically at family stability and well-being, states may best measure success through tools that calculate stability and well-being scores over this array of factors, such as how the Ohio Department of Job and Family Services has adapted the [EMPath Bridge to Self-Sufficiency tool](#) to calculate a score through its Benefit Bridge Pilot program. Community Service Block Grant (CSBG) [individual and family-level national performance indicators](#) offer an additional menu of stability and well-being outcome measures that OFA could consider.

Our membership has developed a set of [TANF Modernization Core Principles](#) that lay the groundwork for a renewed vision of what TANF can be. These values serve as the foundation for building modern TANF programs to support child and family well-being for generations to come and allow us to take a bold and systematic approach to program reform that is rooted in evidence and outcomes rather than ideologies. The table below offers examples of how each of these core principles might inform the selection of stabilization and well-being indicators. Consistent with our fourth core principle, we urge the Administration to seek out consultation from families who have previously participated in the TANF program before establishing which indicators be included in the pilot project design.



Lastly, TANF on its own is limited in its ability to have direct impact at the community-level and so we would generally recommend individual-level indicators be used. There may be exceptions, such as in developing an equity goal that a pilot state may seek to measure TANF participant indicators in relation to all low-income families in that zip code, region or state and seek to discern differences.

TANF Modernization Core Principle	Examples of Potential Indicators
To help families achieve economic mobility, TANF must support the physical, social, and emotional well-being of individuals and their families	<ul style="list-style-type: none"> • Child welfare-related outcomes¹ • Perceived sense of safety • Parent-child relationship/contact/access indicators • Substance use treatment access and/or participation
TANF must prioritize tailored solutions that help families succeed for the long-term	<ul style="list-style-type: none"> • Financial wellness (e.g. credit improvement, financial capability training, reducing debt, increasing assets) • Barrier removal (e.g. driver's license attainment; criminal record expungement, basic skills development) • Percent of TANF individuals currently receiving TANF assistance who formerly received TANF assistance as children
TANF should foster conditions that advance a person's sense of agency over their life and belonging within their community	<ul style="list-style-type: none"> • Measures of self-efficacy or perceived locus of control • Reliable transportation
To best help families achieve their goals, TANF policies should be centered in evidence and promising practices that reflect the lived experiences of families.	<ul style="list-style-type: none"> • Consistent with this core principle, we urge the Administration to seek out consultation from families who have previously participated in the TANF program before establishing which indicators be included in the pilot project design.
The broader workforce system must provide a coordinated continuum of services that supports all jobseekers' strengths, goals, and needs.	<ul style="list-style-type: none"> • Child care access and use • Extent to which earnings and benefits packages match livable wage calculations post-exit • Engagement in approved education or training activities • Community college participation

¹ In considering child welfare outcomes, we urge OFA to give careful consideration to ensure that their design focuses on prevention and does not create unintended effects that could exacerbate the link between poverty and child welfare.



TANF Modernization Core Principle	Examples of Potential Indicators
The broader workforce system must provide a coordinated continuum of services that supports all jobseekers' strengths, goals, and needs. (continued)	<ul style="list-style-type: none"> • Occupational wellness (satisfaction and/or sense of purpose in work, school, volunteering activities) • Improved literacy, basic skills, and English language acquisition
Families must have access to adequate assistance and services that allow them to meet their basic needs while working to achieve their long-term goals	<ul style="list-style-type: none"> • Safe and stable housing • Perceived capability to meet basic needs • Reduction in financial shock² events

3.3 - What technical assistance or supports would be helpful for states and service providers in designing and implementing pilots? What obstacles do you foresee and how can ACF provide assistance to overcome or manage them?

States would welcome regular opportunities for pilot state peer-sharing through the creation of a community of practice and additional avenues for pilot states to stay connected. Additionally, states not participating in the pilot projects would benefit from hearing regular updates about the progress of and key learnings from the pilots. APHSA is eager to partner with OFA and others in supporting such efforts.

States who are interested in participating in a pilot project but have not been tracking outcomes of TANF exiters may benefit from a tiered application process that begins with a general assessment of states' readiness. During subsequent application steps, OFA might provide technical assistance services to support states in preparing to collect baseline data. This would help OFA in selecting pilot sites who have demonstrated the necessary commitment to complete the pilot and provide selected pilot states with the support they need to establish realistic benchmarks for year two of the pilot.

Additional obstacles states may face include:

- *Procurement* – pilot states will need to design new or modify existing contracts with service providers that shift away from the work participation rate and towards new performance benchmarks.
- *Assessment tools* – given the shift away from the work participation rate, pilot states will need to develop (or outsource the development of) tools and strategies to apply client coaching models or frameworks that support individualized evaluations of families' needs and goal-setting with participants.

² See for additional information: <https://www.performance.gov/cx/life-experiences/facing-a-financial-shock/>



- *Staff training* – pilot states will need to reorient staff around the coaching model in replacement of the work participation rate standards.
- *Technology* – depending upon the family stability and well-being metrics that pilot states employ, they may need to set up new data-sharing agreements with other agencies, departments or community partners to run reports on these indicators; in addition, they will need to design and implement new business process rules and workflows.

3.9 - In what ways should equity be considered when implementing a pilot? Are there tools or resources needed to promote equity in pilot design, implementation, and evaluation? What factors or data points would you consider important to ensuring equity (avoiding disparate impacts) in the implementation of work and family well-being measures as part of the pilot? How do we ensure that the individual experiences of families that receive TANF cash assistance are considered in the pilot design, implementation, and evaluation?

The pilot program creates an opportunity for states to shift away from the rigidity of the work participation rate and instead test methodologies that effectively mobilize families out of poverty. Dr. Camara Phyllis Jones' work on health equity, she defines how equity is achieved. It requires three components, Jones argues: "(1) valuing all individuals and populations equally—that is, there are no invisible, undervalued, or disposable people; (2) recognizing and rectifying historical injustices; and (3) providing resources according to need—not equally, but according to need." While this question is complex and we look forward to gleaning insights from others in response to this question, at APHSA our guiding star is that human services foster social and economic mobility by providing access to the key elements necessary for children and families to be well and thrive. Thus, we can offer two recommendations to OFA in its approach to seeking to develop an equitable pilot program.

- Offer pilot sites (or perhaps even all states) technical assistance about how to use data to understand disproportionalities in TANF programs. Specifically, states may need support in system enhancements to ensure they are collecting informative data. Once collected they may need additional support in identifying and analyzing disparity data. Building capacity for dashboards that can disaggregate performance benchmarks by race, geography, income level, and other key factors can help agencies refine their services over the duration of the pilot period to not just improve performance overall but within sub-groups experiencing disproportionately negative outcomes.
- Develop a council of consultants with lived experience receiving TANF to ensure that the individual experiences of families that receive TANF cash assistance are considered in the pilot design, implementation, and evaluation. Further, support participating states in constructing their own community councils that embed this view into their approach to defining and measuring success.

Source: <https://www.ncbi.nlm.nih.gov/books/NBK540766/#:~:text=Achieving%20health%20equity%2C%20according%20to,need%E2%80%94not%20equally%2C%20but%20according>



Work Outcomes

4.8 - What technical assistance or supports would be helpful for collecting data for work outcomes? What obstacles do you foresee and how can ACF and its partners provide assistance to overcome or manage those barriers?

We see several key opportunities for ACF/OFA to prepare to support states in collecting the mandated performance indicators listed in Section 304 of the FRA.

First, regarding the fourth performance indicator (indicator D) related to attaining a high school degree or equivalency, most states would welcome technical assistance to set up acceptable methods to measure this indicator. Current state strategies of collecting credential data for TANF or WIOA exiters vary. Some states include credential-related questions during initial conversations with a program applicant to ensure their workforce placements will be appropriately engaging and/or to assist the participant in attaining the credential prior to program exit; these states may maintain reports on the fourth metric by seeking to keep in touch with program exiters. Most states will also work towards establishing data sharing agreements with, for example, adult education databases that record high school or equivalency program graduates in their state. States may need up to two years to research who in their state is collecting this data, to build a relationship with the party, and to agree to a Memorandum of Understanding (MOU) in sharing the data. Some may need coaching or guidance about possible entities to reach out to, the process of establishing MOUs with an entity, or they may benefit from the option of contacting experts when they run into situation-specific difficulties. We anticipate that over time, states will improve their processes to more fully capture and report this data. During early years of national reporting, we encourage OFA to collect and disclose limitations in data collection that may effect national outcomes being reported.

Second, for indicators A, B, and C of this section, we recommend that ACF/OFA provides flexibility for states to collect and report wage data using state wage interchange systems (SWIS), consistent with standard practices for WIOA outcome reporting. Fostering alignment with WIOA outcome reporting we believe will ensure the most accurate data is reported and support continuing efforts to facilitate effective collaboration between TANF and the broader workforce system. For states that lack the infrastructure to use SWIS data in early years of FRA outcome reporting, we recommend that OFA provide an option to report outcomes through the National Directory of New Hires.

Third, states asserted that formalizing inter-agency data sharing agreements between state workforce and human services agencies will be significant in implementing Section 304 of the Fiscal Responsibility Act of 2023. Setting up these agreements may be easier in some states than others, and joint guidance released by the US Department of Labor and the Administration of Children and Families/Office of Family Assistance would reduce barriers for states working to establish these agreements quickly. Accordingly, APHSA strongly urges OFA to provide direct technical assistance to implement inter-agency data sharing



agreements and to collaborate with the U.S. Department of Labor (USDOL) in developing joint guidance to state workforce and human services agencies on developing these agreements. Fourth, regarding all four indicators, assuming states are permitted to report on the outcomes of their program participants independently (e.g., rather than solely relying on the National Directory of New Hires (NDNH) at the federal level), states would benefit from detailed guidance, published by OFA, on data collection, analysis, and reporting standards, to ensure states are working with data sets that are as accurate as possible and to streamline the reporting process for states and improve data quality. Additionally, on-going federal efforts to help facilitate aligned data governance and analysis across states – preferably in partnership between OFA and USDOL – would help to build and maintain robust data analytics capacity among states. States have also expressed an eager interest in OFA—in partnership with USDOL— to support opportunities for state workforce and human services agencies to engage in peer learning and information sharing as they begin implementing the new work outcomes measures for the TANF program. APHSA and NASWA’s respective networks of state human services and workforce leaders provide potential forums for this cross-sector collaboration.

Lastly, states are frequently asking about how they might track the outcomes of TANF exiters that transition into gig-economy jobs or self-employed roles such as being a caregiver, cleaner, tour guide, dog walker, substitute teacher, rideshare driver, personal shopper, photographer, graphic designer, web/software developer, etc. States would welcome technical assistance to support them in designing successful methodologies to track which TANF exiters are part of self-employed populations.

4.4 - When thinking about exit from the TANF program, what are the most important considerations? In what manner, if any, should the issue of “churn” be addressed? (That is, those cases that cycle off for short periods of time due to causes such as administrative errors, delays in redetermination, or sanctions.)

After numerous discussions with our membership, we have identified three important considerations when defining exit from the TANF program. In considering these items, as mentioned previously, we urge the Administration to allow states adequate flexibility to design their TANF programs based on the distinct communities they support within their state and the specific design of their workforce and human services agencies. Below, we offer some recommendations about potential approaches to defining and tracking exiters.

First, as is mentioned in the question, the issue of “churn” must be addressed in order to collect meaningful data about TANF exiters. To ensure that TANF participants who cycle off the program for a short period of time and soon reapply are not counted twice, decreasing the validity of the indicator data, we would recommend that exiters only be identified after 90 days of their last benefit payment. Similar to WIOA, we would recommend that after 90 days without a benefit payment, a retroactive exit be processed on the individual’s last payment date. Using a similar model in TANF as WIOA in this way would allow for better collaboration between the two programs for states that choose to coordinate them. In addition, in the situation where an individual has a gap in benefits of over 90 days but then re-enrolls in TANF, states will need guidance about whether to count and report on this individual multiple times within the same year.



Second, it is important to consider that WIOA and TANF use different definitions of program exit; according to FRA statute, TANF exit is defined as the last time a participant receives a TANF payment, yet WIOA exit is defined as the last time an individual participates in a work program. For states that would like to, we recommend OFA allow the option to develop common exit definitions across WIOA and TANF to ease coordinating, reporting and tracking quarters between the two programs. Additionally, for states that would like the two programs to coordinate more effectively, we recommend US DOL and ACF/OFA provide the state option to report integrated Periods of Participation (POP) across the two programs. Consider, for example, an individual who is on TANF but is also enrolled in WIOA for a work-based learning program. While enrolled, the person becomes ineligible for TANF due to their earnings from the work-based learning program. States should have the option to extend the individual's POP until their last day participating in the WIOA program, resulting in an integrated POP across the TANF and WIOA programs; thus, the individual's outcomes would be included in both programs' reporting.

Lastly, in order to collect meaningful data about TANF program recidivism, we also recommend ACF/OFA consider allowing states the option to track reason for exit as well (e.g., no longer eligible due to increased wages, reached the state's time limit for benefits, were sanctioned, experienced delays in redetermination, administrative error, etc.). While for some states a requirement to track these subcategories of exit may be overly burdensome, other states may have the staffing capacity and desire to be able to identify which reasons are the most common drivers of exit for their TANF program for individuals and thus to be able to adjust their program to better meet those individuals' needs.

4.1 - In your experience, what data sources on employment and earnings are most accurate and practical for work outcomes measures similar to those required by the FRA? What do you see as advantages and limitations of matching with the National Directory of New Hires (NDNH) at the federal level, as compared to the State Wage Interchange System (SWIS) or other alternatives? We are particularly interested in understanding the costs, timing, administrative burden, and reliability of different data sources.

In general, we see the utility of having a centralized data match at the federal level, with an available state option to submit supplemental wage information in addition to information needed for a match with the NDNH (see more below in section 4.2). Some states may need to rely on NDNH especially over the next two or three years while states establish key data-sharing and data-analysis relationships, MOUs, and infrastructure. However, TANF agencies have concerns about a federal-level outcomes-tracking system that (a) doesn't provide states quarterly reports on performance, or (b) eliminates the state option to collect their own data in addition to the federal data or discourages state-level interagency coordination between workforce and TANF. Lastly, because comparing outcomes across states may be misleading due to several factors detailed in section 4.6, we encourage the Administration to consider how the use of the NDNH may exacerbate the inevitability of comparisons across states. We discuss each of these concerns in greater detail below.



Centralizing data collection and analysis might make sense in some situations. For example, some states do not yet have data-sharing agreements established with their workforce agencies to access state wage data. Expecting agencies to all reach agreements in the next ten months (when the mandated reporting will go into effect) will likely be unfruitful; having a federal option available for the next several years while states create MOUs and data analysis capabilities (either in-house or outsourced) would be a welcomed support for many states. In general, we are concerned about the prospect of all states using, or being required to use, the National Directory of New Hires at the federal level as the only data source to measure state's performance on FRA's first three employment-related indicators (indicators A, B and C). In part, this concern stems from the incomplete nature of the database, namely the database's required deletion timeline of twenty-four months (Tollestrup, 2019), the absence of wage data from employers that do not have unemployment insurance such as, in some states, religious organizations or employment established through a rehabilitation program, and the lack of data representing self-employed and gig-economy workers. However, using the NDNH to nationally cross-match along with statewide cross-match may improve data quality overall in measuring states' TANF program performance.

In order for the NDNH to be useful for states aside from fulfilling their statutory requirement to report on TANF outcomes to OFA, we urge the Administration to explore strategies to deliver timely, ideally quarterly, reports to states. With the current lag inherent in the measures (states already need to wait until an individual's fourth quarter after exit, and then often wait three or four quarters more to access that data), states who wish to use the data to inform how to improve their programs worry that centralizing the system will reduce their data visibility and therefore its utility.

For state agencies that already have robust outcome-tracking systems that undergird their local TANF modernization efforts, we are concerned that once a centralized option exists to meet the statutory requirements, some may feel that their state-level efforts are unnecessary or redundant. The same may be the case for states that were beginning to explore data sharing agreements or invest in improved data infrastructure in their agency. We would be concerned if states were required to use the NDNH data solely to measure their performance. We urge ACF/OFA to consider unexpected impacts on state-level TANF modernization efforts when designing an option for data collection and analysis at the federal level and to consider how to promote state-level workforce and TANF interagency coordination.

As we explore further in section 4.6, comparing outcomes across states may be misleading because of variation in state economies, labor markets, and TANF program structures, thus data differences may not reflect actual differences in outcomes for families (Hahn, 2023). We encourage the Administration to consider how the use of the NDNH may exacerbate the inevitability of comparisons across states and how to disclose differences in methodologies and limitations of reporting sources in its published reports.

Sources: https://www.everycrsreport.com/files/20191001_RS22889_4293b44613b875a9e86ceb348-ee496204e170ac.pdf

<https://www.urban.org/sites/default/files/2023-08/New%20TANF%20Employment-%20Outcomes%20Rules-What%20States%20Should%20Know%20.pdf>



4.2 - If given the opportunity, do you believe state agencies would have the interest and capacity to voluntarily submit supplemental wage information (similar to WIOA ^[9]) in addition to information needed for a match with the NDNH? If so, would states be more likely to submit supplemental individual-level data or aggregated outcomes measures using an alternative data source? We are interested in the rationale behind the preferred approach.

Assuming OFA is considering supplemental wage information to include automated database systems or data matching with other partners with whom data sharing agreements exist, some states would likely take advantage of this as a state option; others will likely have staffing concerns and would need additional funding to elect this option. As such, APHSA urges the Office of Family Assistance to provide state flexibility to submit supplemental wage information if they choose but refrain from making this a requirement for all states. This flexibility will be critical over the next five years as states work to implement the Fiscal Responsibility Act's changes to their state programs.

States would likely aim to repurpose reports they are already pulling to meet other requirements; for some, individual-level data would likely make most sense while others would prefer to submit aggregate.

4.10 - Please describe the specific steps for a state to begin collecting and reporting data and their estimated duration. For example, please estimate the timeframe for system changes to generate a list of SSNs of work-eligible individuals who left TANF in a given quarter.

APHSA encourages OFA to review its members' individual RFI responses to understand the different timeline and process steps for collecting and reporting data. On the whole, major changes in data collection and reporting, such as envisioned in the FRA requirements, can easily take as much as two years to implement for states. Exact timelines vary depending on factors such as (1) existing backlogs for agency IT projects; (2) data sharing and other legal requirements agencies must resolve; (3) technical limitations of state agency data infrastructure; (4) new contracting requirements to procure resources for data collection and reporting; and (5) staff capacity limitations.

4.5 - We are interested in understanding the timelines involved in reliably reporting and calculating outcome measures. What operational issues affect the timing and availability of data for the work outcomes measures, including TANF caseload, employment and earnings, and education data? For example, what is the earliest turnaround time for reliably reporting that a TANF case has closed? What are the timelines involved in matching and working with employment and earnings data and education data?

States face several operational challenges that increase delays in accessing work outcome measure data. State agencies will most often rely on wage data from a partner. These partners will usually share data reports from the previous quarter one or more months after the quarter has closed, meaning that the



earliest a state would be able to report wage data from the fourth quarter after exit for an individual who exited in Q1 2023 would be in Q2 2024 (four quarters after exit plus one or two months). For most states, a three-quarter lag is more typical (e.g., data would be available Q4 2024 measuring fourth quarter after exit data for an individual who exited TANF in Q1 2023).

Regarding the reliable reporting that a TANF case has closed, as we mentioned previously, the issue of “churn” must be addressed to collect meaningful data about TANF exiters. To ensure that TANF participants who cycle off the program for a short period of time and soon reapply are not counted twice and decreasing the validity of the indicator data, we would recommend that exiters only be identified after 90 days of their last benefit payment. Like WIOA, we would recommend that after 90 days without a benefit payment, a retroactive exit be processed on the individual’s last payment date. Using a similar model in TANF as WIOA in this way would allow for better collaboration between the two programs for states that choose to coordinate them. In addition, in the occurrence that an individual has a gap in benefits of over 90 days but then re-enrolls in TANF again, states will need guidance about whether to count and report on this individual multiple times within the same year.

Most states have not been collecting education data and will likely need three to five years to make necessary system changes to collect and report which program participants and/or exiters under the age of 24 obtained a high school degree or equivalent within one year of exit from the TANF program. While some states will aim to collect a participant’s credential information during application or at the beginning of their program participation, if the individual has yet to obtain the degree upon exit, states have often experienced difficulties in keeping in touch with TANF exiters; thus, post-exit survey data is expected to be largely incomplete. Identifying which entities in a state might have adult education data will take time, a necessary step before states can begin to establish a data sharing agreement. Additionally, social security numbers are not often used in education systems which presents an additional challenge for data matching. Once databases, relationships, MOUs and additional agreements are established, states expect a one-year lag (e.g., Q1 2025 for fourth quarter after exit data for an individual who exited TANF in Q1 2023). Typically, education system data is collected and reported on an annual basis and most high school diplomas are earned annually in the spring semester.

4.6 - What factors (e.g., demographic, economic, policy, programmatic) should be considered for presenting the work outcomes measures in context? Are there variables such as state economic conditions that may impact state outcomes and are outside a state TANF program's control?

All four of these types of factors will significantly influence work outcome variation from state to state. Macroeconomic contexts need to be considered when interpreting outcomes. For example, if we face a recession, this will inevitably impact not just a state’s ability to help participants achieve work outcomes, but it will also shift the composition of its TANF caseload, which may influence outcomes.

Of course, TANF policy decisions will impact outcomes as well. Heather Hahn (2023) wrote a concise two-page brief explaining the nuances of these differences well. “When measured across states,” she writes, “TANF employment outcomes become measures of policy structures, not outcomes.” She provides an



example that demonstrates how income thresholds, asset limits, and time limits predict outcomes. As mentioned in our comments about section 4.1, comparing outcomes across states can be misleading because differences in TANF program structures and the potentially eligible populations in each state, rather than actual differences in outcomes for families, will influence the results.

Additionally, demographic differences between families will influence the results (e.g., domestic violence, mental illness, physical illness, disability). Generally, states would be supportive of reporting on some highest priority additional factors to help contextualize families' outcomes; if added, states would want a succinct list of demographic characteristics to measure that would minimize administrative burden on states.

Source: <https://www.urban.org/sites/default/files/2023-08/New%20TANF%20Employment%20Outcomes%20Rules-What%20States%20Should%20Know%20.pdf>

4.7 - In what ways should equity be considered when implementing work outcome measures? What are the advantages of and/or possible difficulties associated with reporting data disaggregated by race, ethnicity, gender, age, disability, other demographic characteristics, or geography to enable equity analyses around work outcomes?

We applaud the Office of Family Assistance (OFA) for considering equity in your administration of implementation of the mandated outcome-based reporting. Across the social determinants of health and well-being, which create the enabling conditions for people to thrive, national data show that people of color are more likely to face structural barriers within the systems we all rely on to reach our potential. Many people of color may identify with other minority groups, thus we see significant advantages to reporting data disaggregated by race, ethnicity, age, disability, other demographic characteristics or geography. Analyzing disaggregated data for disparities in outcomes is a critical way the human services sector can begin to address the root causes of racial disparities through policy and practice and enhance well-being for all people.

Ultimately, states face numerous difficulties when evaluating equity in their TANF programs. Challenges likely include systems that do not yet have the infrastructure to capture data efficiently, not yet having a common language or framework about equity established in their agency, the need for further staff training and development to promote race equity, and increased technical assistance, as mentioned in 3.9, about how to use data to understand disproportionalities in TANF programs. Specifically, states may need support in system enhancements to ensure they are collecting informative data, and once collected they may need additional support in identifying and analyzing disparity data. For county-administered states, counties may each collect data differently, making it even more challenging to glean an accurate state-wide picture of who is being served well by the program and who is not.



4.9 - Please describe the characteristics of successful partnerships between the public workforce system and the TANF system that support the collection of data for the work outcomes measures required by the FRA?

Characteristics of successful partnerships between public workforce system and the TANF system as heard from our members include:

- (1) Realistic and aligned goals:
 - a. The more aligned the two programs (definitions of “program exit,” timelines of each quarter and each year, performance indicators), the better. This begins with having clearly defined goals for measuring and improving employment outcomes.
 - b. States need to recognize and plan for the likelihood of frequent staff turnover and build opportunities to assure continued collaboration and team building. Co-design of a data system or data sharing and analysis will make staff transitions easier.
- (2) Close communication and collaboration:
 - a. States that are successfully partnering between workforce and TANF are not simply referring individuals from one side of the house to the other but are holding coordinated team meetings to facilitate warm hand-offs from one program to another (TANF to WIOA for example). In order to do this effectively, the two teams need to have strong working relationships and know how to contact each other to discuss distinct challenges about a specific case, etc.
 - b. The two teams may also benefit from having established protocols for progress updates and data exchange.
 - c. Data collection and analysis is best designed with the involvement of representatives from the workforce and TANF agencies.
- (3) Client-centered culture:
 - a. Leveraging the strengths and expertise of separate programs (e.g., the TANF agency may have case management and referral capacity while the workforce agency may have career guidance and connections to employers). Agencies in successful workforce-TANF partnerships also leverage other existing partnerships (e.g., community colleges, CBOs and faith-based organizations, public/private partnerships)
 - b. Facilitating warm hand-offs for participants transitioning from one program to the other, or if a TANF participant is enrolling in a work-based learning program in WIOA, for example.

