



www.legalaiddc.org
1331 H Street, NW
Suite 350
Washington, DC 20005
(202) 628-1161

**Testimony of Lisa Meehan,
Staff Attorney, Public Benefits Law Unit
Legal Aid DC**

**Before the Committee on Human Services
Council of the District of Columbia**

Performance Oversight Hearing Regarding the Department of Human Services

February 26, 2026

Introduction

Good morning, Chairperson Frumin and Members of the Committee on Human Services. My name is Lisa Meehan, and I am a Staff Attorney in the Public Benefits Law Unit at Legal Aid DC.¹ Legal Aid submits the following testimony to urge the DC Council to address cuts to public benefits programs and the roll-out of federal program changes. Legal Aid has submitted separate testimony to call attention to ongoing problems with the DC Department of Human Services' (DHS) administration of vital safety net programs.

Legal Aid DC is a proud member of the Fair Budget Coalition, working for an equitable DC and of the "TANF is Still a Lifeline Coalition", a coalition that is advocating for the reversal of the harmful cuts to TANF set to take effect October 1 of this year. This has been a particularly difficult year for the residents who rely on the District's safety net programs, many of whom are Legal Aid clients. We submit this testimony to urge the

¹ Legal Aid DC is the oldest and largest general civil legal services program in the District of Columbia. The largest part of our work is comprised of individual representation in housing, domestic violence/family, public benefits, and consumer law. We also work on immigration law matters and help individuals with the collateral consequences of their involvement with the criminal legal system. From the experiences of our clients, we identify opportunities for court and law reform, public policy advocacy, and systemic litigation. For more information, visit www.LegalAidDC.org.

Council to address cuts to TANF and SNAP that will cause imminent harm to Legal Aid's client community.

The Council Must Reverse Cuts to TANF

Devastating cuts to the TANF program are slated to go into effect in October of this year. These cuts include:

- (a) Eliminating annual cost of living adjustments for TANF benefits;
- (b) Reinstating a lifetime time limit for receiving TANF benefits; and
- (c) Increasing penalties when a parent does not work or meet work search requirements from 6% of the family benefit to 25% of the family benefit.

Even without these cuts, TANF benefits are already not enough to meet families' most basic expenses. The current maximum TANF benefit amount for a single-parent household with two children is \$803/month, compared to the federal poverty guideline of \$2,277/month, and a median rent of \$3,000 for a three-bedroom or \$2,850 for a two-bedroom apartment in DC.² Under the framework introduced by the cuts, by October of 2029 a family of three subject to the 60-month limit and with a work sanction would have their current \$803/month benefit reduced to just \$159/month – an amount which is just 6% of the federal poverty guideline. This revised benefit is clearly not enough for *any* family to meet their most basic needs.

Research shows that punitive measures like strict work requirements and time limits for TANF harms children and families. TANF work requirements do little to improve employment outcomes. When Kansas imposed stricter TANF work requirements, more than 7 in 10 families had no earnings or earnings below half the federal poverty line four years after exiting the TANF program.³ TANF work requirements also do little to reduce poverty and instead increase rates of deep poverty (defined as income below half of the

² <https://dhs.dc.gov/service/temporary-cash-assistance-needy-families-tanf>, <https://aspe.hhs.gov/detailed-guidelines-2026>, and <https://www.zillow.com/rental-manager/market-trends/washington-dc/?bedrooms=2>, last accessed February 6, 2026.

³ Tazra Mitchell, LaDonna Pavetti, and Yixuan Huang, "Life After TANF in Kansas: For Most, Unsteady Work and Earnings Below Half the Poverty Line," CBPP, updated February 20, 2018, <https://www.cbpp.org/research/income-security/life-after-tanf-in-kansas-for-most-unsteady-work-and-earnings-below-half>.

federal poverty line).⁴ Studies also show that families who lost cash assistance due to TANF work requirements faced serious consequences including a higher risk of homelessness, utility shutoffs, and lower school attendance among children.⁵

The Council must also recognize that these types of punitive policies stem from history of anti-Black racism and the idea that only some families are deserving of support. This history of racism bears out in the disproportionate impact these cuts would have. According to DHS's own data it shared during the TANF working group meetings in February of 2026, 50% of TANF recipients live in Ward 7 and 8, and 96% of current TANF recipients in DC are Black.

We urge the Council to consider what will happen to the children in a household of three, whose total household monthly benefits will be reduced to \$159 for the entire household. What kind of housing will those families be able to secure? What will food security or stress in the household look like, for both parents and children? These are the types of questions that need to be answered before such harmful cuts go into effect.

These TANF cuts are not based on any careful examination of the TANF program, any change in the research, or any discussion with those who will be affected or those who work within the program every day. This is a top-down approach that makes cuts first and asks questions later. The timing could not be worse for families, as these cuts coincide with other cuts to SNAP, Medicaid, and Alliance.⁶

⁴ Arloc Sherman, "Work Requirements for Cash Assistance Fueled Rise in Deep Poverty," CBPP, November 13, 2018, <https://www.cbpp.org/blog/work-requirements-for-cash-assistance-fueled-rise-in-deep-poverty>.

⁵ Nancy E. Reichman *et al.*, "Variations in Maternal and Child Wellbeing Among Financially Eligible Mothers by TANF Participation Status," Center for Research on Child Wellbeing Working Paper #03-03-FF, April 2003, <https://fragilefamilies.princeton.edu/sites/fragilefamilies/files/researchbrief19.pdf>.

⁶ DC must implement SNAP work requirements for Able Bodied Adults without Dependents (ABAWDs), and Medicaid work requirements in the future. The Council has also made cuts to the DC Healthcare Alliance and Medicaid, which Legal Aid urged them to reverse in our Oversight Testimony Regarding the Department of Healthcare Finance, <https://www.legalaiddc.org/sites/default/files/2026-02/LA%202026%20DHCF%20Oversight%20Testimony.pdf>.

Furthermore, all of these cuts come with a significant administrative burden that DHS is ill-equipped to meet. As detailed in my colleague's separate testimony, DHS regularly makes errors with people's benefits under the current framework⁷. Adding additional administrative procedures such as those that would be required for accurate accounting of new TANF time limits and implementation of work sanctions seems untenable – especially in light of other changes that DHS is having to make to other programs it administers. Errors will only worsen if DHS must implement these significant and harmful changes.

Legal Aid was invited to participate in the DC DHS TANF working group along with members of this Council, DHS, advocates, TANF beneficiaries and other stakeholders. We appreciate the opportunity to be a part of this group so that we can come together to discuss these substantial cuts to TANF. However, we also have concerns. We are concerned that the limited time that the working group is scheduled to meet – three mornings in total – is not enough time to dive into the complex problems that implementation of these cuts will create for families. The working group just started meeting this week. With such a short time before the next budget is sent to the Council, there is little hope that this working group will have an opportunity to dive into all the issues facing TANF recipients who will be affected by the cuts. DHS has also proposed a very limited agenda, solely focusing on implementation of the program cuts and discussion of a definition of a hardship exemption. This is discouraging, since we believe that neither research nor the District's experience with time limits or sanctions lends any support to these devastating cuts. Still, we hope that with the limited time that we have, we will have an opportunity to work together to tackle the complex issues facing TANF recipients today.

We recognize that changes to TANF purportedly come due to the dire financial times that DC is currently facing. Nonetheless, the District is asking those who need the most support and face the hardest struggles to carry the heaviest burden in a tight budget year. That the majority of the people who will be harmed by these cuts are Black residents living in Ward 7 and 8 cannot be ignored.⁸ The elimination of COLA, reintroduction of lifetime time limits, and increases in work sanctions will have a

⁷ In Fiscal Year 2024, DC had a SNAP error rate of 17.38%, one of the highest in the nation. <https://www.fns.usda.gov/snap/qc/per>.

⁸ [Performance Oversight Responses for the Department of Human Services](#), March 3, 2025, question 171 on page 162/183.

devastating impact on the health, safety, and security of children and their caretakers, and we urge the Council to reverse these cuts.

DHS's Rollout of SNAP Work requirements for Able Bodied Adults Without Dependents (ABAWDs) Has Been Confusing

Federal changes require DC to start implementing SNAP work requirements for Able-Bodied Adults Without Dependents (ABAWDs). DHS's timeline of when work requirements will go into effect is still unclear to beneficiaries, and DHS's communication to *all* SNAP recipients regarding the changes has caused unnecessary confusion, stress, and panic for DC residents.

In January 2026, DHS sent mass generic notices to all SNAP recipients informing them of the upcoming changes to the SNAP program which will subject ABAWDs to work requirements unless they qualify for an exemption. The notices said the changes would go into effect in early 2026 and that if the recipient is subject to work requirements and does not comply, they may only have access to SNAP benefits for three months within a three-year period. The notice said that DHS would send more information in the future.

The notices did not specify when in early 2026 the changes would go into effect, what exemptions were available, or how to claim one. The notices went to *all* beneficiaries, including those clearly not subject to the work requirements such as people over 64 years old, people with dependents, and people in mixed-status households where only minors were part of the benefit household. Beneficiaries also received robocalls regarding the work requirements.

These DHS communications caused panic and confusion. People who will be subject to the work requirements did not understand when this would be required of them or what was required. People who clearly will not be subject to the requirements also panicked because they did not understand that the notice would not apply to them.

DHS has since stated that it sent the notice to all SNAP recipients because it wanted to inform everyone of the changes, even if they were not subject to them at the time. In other words, DHS chose to paint with a broad brush, rather than tailor notices or include a disclaimer for people who DHS knew would not be subject to work requirements. For example, DHS could have added tailored language to outgoing notices to individuals that DHS did not believe would be subject to ABAWD rules, clarifying that the information that DHS had on file indicated they would not be subject to the work requirements, but if their

household composition changed in the future, it could apply depending on who was added to their household.

DHS did not include any advocate group in the planning process of how to communicate changes to District residents before mass communication went out. Since then, however, DHS has started to involve advocates at our request and has invited advocate feedback on future notices. We have been told that implementing our suggestions may not be possible before the next round of notices, as they will go out very soon. Nonetheless, we appreciate the opportunity to collaborate with DHS to ensure residents have crucial information about their benefits. As of today, Legal Aid is still unsure of the exact date that the ABAWD work requirements will go into effect, but we understand that it is likely to go into effect in late April 2026.

Legal Aid urges the Council to continue to oversee DHS's implementation of changes to the SNAP program, and other DHS programs to ensure that new policies are clearly communicated and provide sufficient information for people to understand what is happening to their benefits. People rely on SNAP benefits to feed themselves and their families. Sending confusing letters, without sufficient information or targeted information, creates fear and uncertainty for District residents regarding critical benefits.

Conclusion

Legal Aid urges the DC Council to address cuts to public benefits programs and the roll-out of federal program changes. Specifically, we ask that the Council reverse the local cuts to the TANF program, and ensure that DHS clearly communicates about the rollout of SNAP work requirements.