



**Testimony for Public Oversight Roundtable on “Human Impact of the 41.7% Cut in
Temporary Assistance for Needy Families Benefits, October 1, 2014”
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Typical day-to-day decisions about how long the groceries must last and which bills to pay have suddenly become much more difficult for some District families. With Temporary Assistance for Needy Families (TANF) benefits further reduced on October 1 for families in which a parent has received TANF for more than 60 months, long-term TANF families have not been left with safe or healthy options regarding how to survive. This benefit reduction—which, at 41.7% of last fiscal year’s benefit amount, is the largest yet—is already having a harmful effect. **In light of the real pain that this reduction will cause for long-term TANF parents struggling in our local economy and the fundamental changes to the TANF program, it is crucial that the Council restore benefits for affected families.**

This benefit reduction comes as many TANF parents are confronting a local economy that too often puts them at a disadvantage.² District families face high unemployment rates and a high cost of living. Even with the recent cost-of-living adjustment made to the standard maximum TANF benefit (for example, \$438 for a household of three), TANF families remain under pressure to keep up with expenses. In fact, families receiving the standard maximum TANF today have less purchasing power than they did in 1996 when the TANF program was created.³

For a parent who has received TANF for more than 60 months over his or her lifetime, the situation is even more dire. The current October reduction sets a particularly vulnerable population even further behind. A family of three is not only expected to survive on \$153 a month, it must deal with an assessment process still being fine-tuned, extended waits to receive employment-related services, and an evolving process to obtain time limit exemptions.

¹ The Legal Aid Society of the District of Columbia was formed in 1932 to “provide legal aid and counsel to indigent persons in civil law matters and to encourage measures by which the law may better protect and serve their needs.” For more than 80 years, Legal Aid staff and volunteers have served tens of thousands of the District’s neediest residents. Legal Aid has been practicing in the area of public benefits for a number of years, representing clients with TANF, Supplemental Nutrition Assistance Program (SNAP, commonly known as food stamps), and Medicaid cases.

² See Marina Manganaris, DC Fiscal Policy Institute, For Some DC Groups of DC Residents, Unemployment Remains High in the Wake of the Recession (2013), available at <http://www.dcfpi.org/wp-content/uploads/2013/03/3-7-13-Unemployment-Paper-Final.pdf>.

³ Ife Finch & Liz Schott, Center on Budget and Policy Priorities, The Value of TANF Cash Benefits Continued to Erode in 2012 (2013), at 15.

I. Long-Term TANF Parents Struggle to Survive with Extremely Limited Resources in a Difficult Economy.

TANF benefits are one of the last resources available to the District's most vulnerable residents. Although the national economy has largely improved and overall unemployment in the District is falling, this recovery is not universal.⁴ Single parents face far higher rates of unemployment in recent years than they did before the recession, and unemployment for this group remains significantly higher than the rates for childless households or two-parent families.⁵ October's benefit cut does nothing but harm these families further. This harm is real and already being felt, including by Legal Aid clients such as Ms. N.⁶

Ms. N is a single mother raising her child alone. Her daughter is a teenager and Ms. N's months on TANF exceed the five-year time limit. Her health, as well as her daughter's, is a concern for her. She has not worked for some time and worries both that she is not an attractive candidate for employers and that she would not be able to keep up with the demands of a full-time job. When her family's benefits were reduced last year to \$202 per month, she did her best to make that small amount of money stretch as far as it could. Even still, she had to choose each month which bills would be paid and which would be set aside for a bit longer. Often, she would prioritize paying for her landline phone over other bills out of a fear that she and her daughter would not have access to a telephone to call for help if a medical emergency arose.

In late September, Ms. N received a notice in the mail informing her that her TANF would again be reduced. When I spoke with her on the first of October, she seemed incredulous that her \$120 TANF benefit would be sufficient to meet her expenses for an entire month. She typically uses her TANF to buy groceries in the early days of the month before her food stamps benefits arrive. She also sometimes has extra food costs to accommodate the special diet she requires due her diabetes. With this new reduction in TANF, Ms. N is now hoping that \$20 worth of food will last her and her daughter for the week that typically passes before she can access her food stamps. If it does not, she plans to ask family members if they have food items they can spare. With only \$100 remaining in TANF for the rest of the month, Ms. N will have to look to her family for more financial help. Family members, she says, cannot themselves afford to support her—especially as she has needed to rely on their help in months before. For Ms. N, bearing the brunt of another benefit reduction feels like an “open wound” or “a cut that won't heal.”⁷

The Council needs to reverse the TANF benefit cut so that parents like Ms. N can eat more than just “one good meal a day.”⁸ A restoration of the benefit level for families like hers would provide concrete help with food, transportation, and personal care costs.

⁴ See, e.g., Manganaris, For Some DC Groups of DC Residents, Unemployment Remains High in the Wake of the Recession.

⁵ *Id.*

⁶ Ms. N's name has been changed to protect her identity.

⁷ Interview with Ms. N, October 1, 2014.

⁸ *Id.*

II. Changes to the District’s TANF Program Are Underway, But Key Program Elements Are Still Evolving.

Along with the real-life impact of the benefit reductions, there are several programmatic reasons that weigh in favor of restoring benefits. Although progress has been made to improve the TANF program for our city’s families, planned changes to the program are not yet fully complete. DHS continues to make adjustments to the process of assessing parents’ readiness for employment, parents’ wait periods for referrals to TANF employment vendors remain long, and updates to the relevant POWER regulations and policies are needed. With these important program elements still evolving, now is not the time to penalize long-term TANF families with another reduction.

A. DHS Continues to Make Adjustments to Assessment Process.

A central component of the TANF program is the “assessment,” an interview tool that allows DHS to collect information regarding a parent’s education level, skills and interests, employment history, and barriers to employment. We understand that assessments of all current TANF recipients have now been completed. The assessment tool, while a positive step toward meeting DHS’ responsibility of identifying a parent’s readiness for work, is still being fine-tuned by the agency. Some barriers, such as low literacy, remain difficult to detect through the assessment. Given that the first round of initial assessments may not have identified all significant barriers faced by TANF parents, it is unfair to further reduce benefits while important adjustments to the tool are being made.

B. Parents Experience Delays in Receiving Assignments to Employment Vendors.

The TANF program serves families with a range of experiences and histories. While some families need exemptions from work requirements, others could leave TANF for work after receiving training or services. DHS is working to address these varied needs by contracting with employment vendors capable of serving customers across the spectrum of job readiness. However, our clients report delays in their assignments to vendors, with some parents waiting many months before they are finally connected to a vendor. Given the limited capacity of the vendors, parents are often unable to benefit from services immediately after they are assessed. By the time some parents are actually placed with a vendor, their assessments may no longer reflect their current situation and needs. Some may need to be re-assessed. Other parents are missing out on months of the job-readiness supports to which they are entitled. Our clients express frustration that they cannot get started with a vendor as soon as they are assessed. This desire to be connected with work should be encouraged and rewarded, not penalized as it is with October’s additional benefit cut.

C. Updated Regulations and Formalized Policies for Expanded POWER Are Needed.

One improvement to the TANF program has been the creation of time limit exemptions for certain vulnerable families. These exemptions now allow families to “stop the clock” on the

five-year TANF time limit if they fall into one of several categories, such as being needed at home to care for a family member with a disability or being a survivor of domestic violence.⁹ Parents who qualify for a time limit exemption are enrolled in the District’s POWER program, provided benefits at unreduced levels, and offered services that match their situations and abilities. In the last year since the majority of these time limit exemptions have gone into effect, Legal Aid has successfully advocated for a number of parents to be placed in the POWER program.

That these parents needed to seek legal help suggests that the process of being assigned to POWER lacks clarity. Parents we interact with have expressed confusion regarding information they have received about POWER, how to apply, and, once enrolled, what their programmatic rights are. This confusion may be due to the informal nature of the policies surrounding placement in the expanded POWER. The POWER regulations reflect the earlier incarnation of the program as one solely for parents with physical or mental disabilities.¹⁰ Likewise, the policy manual used by DHS also does not reflect the expanded POWER categories.¹¹ As a result, parents, advocates, and even agency staff have little guidance regarding how the expanded POWER program should operate. Without regulations and policies regarding the expanded time limit exemptions, parents who may still be unaware that they could qualify for such exemptions should not be punished.

III. Conclusion.

In delaying previous benefit reductions, the Administration and the Council have shown an understanding that families need access to tools for seeking employment before they—and their children—are penalized. With October’s benefit reduction, the challenge for parents like Ms. N has become even more basic. Without enough food for each day or without metro fare to get to and from appointments, how can she and others focus on finding employment? Today, we ask that the Council to send long-term TANF parents the message that their basic needs are not beyond our care. We ask the Council to give these parents the opportunity to benefit from the full measure of services they have been promised. We ask you to restore TANF benefits for long-term TANF families.

⁹ Time limit exemptions through the POWER program include where a TANF recipient (1) has a physical or mental health problem that prevents the parent from meeting his or her TANF work requirements or from working; (2) is needed at home to care for family member with a disability or serious illness; (3) is a teen enrolled in high school or a GED program; (4) is a caregiver over 60 years of age; (5) is experiencing domestic violence and getting related services; or (6) is a parent of an infant aged 0 to 6 months.

¹⁰ See 29 D.C.M.R §§ 5829 – 5831.

¹¹ See, e.g., Economic Security Administration Policy Manual Part VIII, Section 3.11(explaining that POWER is available for parents who are “unlikely to meet TANF work requirements due to short-term incapacity related to physical or mental health problems or substance abuse.”).