



How States Can Use TANF To Immediately Help Struggling Residents

By Justin Schweitzer | December 17, 2020

In 2019, the Temporary Assistance for Needy Families (TANF) program provided assistance to almost 3 million people—more than 1 million families—experiencing poverty across the United States.¹ TANF is part of a continuum of aid programs such as unemployment insurance (UI), the Supplemental Nutrition Assistance Program (SNAP), and Medicaid that collectively help children and adults living in or at risk of poverty afford basic necessities, find work, and ultimately survive.² Yet Congress has largely left TANF out of COVID-19 relief efforts.

This is the second of three Center for American Progress issue briefs highlighting how TANF can be retooled and utilized to better assist families in or at risk of poverty during the coronavirus crisis. The first brief in this series drew on lessons from the Great Recession to discuss the successes and shortcomings of TANF in responding to economic downturns and to recommend how Congress should retool the program to meet the current public health and economic crisis.³ In short, because of its status as a block grant and strict rules around work requirements and time limits, TANF is currently not designed to react to heightened levels of unemployment and hardship by covering more people or providing increased assistance the way that other aid programs such as UI, SNAP, and Medicaid do; TANF recipients are actually more likely to be subject to cuts in their assistance as need for it rises. To correct for this in the short term, Congress must create a TANF Emergency Contingency Fund—usually referred to as the Emergency Fund—with additional money and specific rule changes that allow and incentivize states to increase aid rather than decrease it.

However, given that an expansion of TANF has not been included in any COVID-19 relief bill passed into law thus far,⁴ it is imperative that states⁵ do everything they can to protect their millions of residents who are facing extreme hardship. In total, states collectively have about \$31.5 billion each year to spend on TANF programs: \$16.5 billion in federal TANF funds and \$15 billion in maintenance-of-effort (MOE) requirements that have to come from states' own funds.⁶ They should utilize the inherent flexibility of TANF to maximize spending on the most efficient and impactful programs that can provide immediate relief for low-income families. In good

economic times, states have often taken advantage of TANF's flexibility to shift funds away from cash assistance,⁷ often to close budget gaps for other, unrelated state programs.⁸ It can be very difficult to reclaim that money for cash assistance,⁹ but this historic recession makes doing so absolutely critical.

TANF is one part of the continuum of aid programs over which states have significant control, and they should be doing everything in their power to ensure that as much assistance is going to as many people who need it as possible. In the absence of federal action, states can still make changes to eligibility criteria, benefit levels, and program requirements, as well as increase spending from TANF reserve funds, to help poor families survive during this crisis. This brief discusses actions that governors, state legislatures, and local agencies can take to strengthen the TANF program and ensure that it adequately addresses increased hardship, even in the absence of congressional action.

The recommendations set forth in this brief include:

- Increase the use and amount of several kinds of TANF benefits, particularly through unspent TANF reserves, with an emphasis on expanding and boosting direct cash assistance but also a focus on subsidized jobs, housing assistance, child care, other nonrecurrent short-term (NRST) benefits, and other technical changes.
- Broaden eligibility for TANF by suspending all work and work-search requirements and sanctions; freezing lifetime use limits and automatically recertifying all recipients; increasing the income threshold and basing eligibility on expected income rather than previous income; allowing childless adults to sign up, at least during the crisis; and making other eligibility changes.

Recommendations

The creation of a new TANF Emergency Fund, as discussed in the first brief in this series, is not guaranteed and likely will not happen anytime soon. Governors, state legislatures, and state TANF administrators should be working to allocate TANF and MOE funds to the most efficient and effective TANF programs. The following policy recommendations would allow more struggling families in each state to access these funds, providing those families with money for the things they need the most. These recommendations build upon lessons from how states used TANF to help families in or at risk of poverty during the Great Recession and in recent months during the COVID-19-induced recession.

Increase the use of all kinds of TANF benefits, with an emphasis on direct cash assistance

At the end of September 2019, the 50 states and Washington, D.C., had collectively accumulated almost \$6 billion in unspent federal TANF funds—\$1.4 billion obligated toward specific purposes but not spent and \$4.5 billion unobligated and unspent.¹⁰

Under federal law, states can carry over unspent funds as reserves for future years, with no specific guidance about when they must be spent.¹¹ Most states have tens of millions of dollars in reserves; 15 states have more than \$100 million, and six—Tennessee, New York state, Ohio, Pennsylvania, Hawaii, and Texas—have at least one-third of a billion dollars of unspent TANF funds.¹²

If these were being saved as rainy day funds, this is the rainy day. As previously stated, a new TANF Emergency Fund from Congress is absolutely needed to fully support and meet the current needs of TANF programs and recipients in every state; however, any amount of pain that states can alleviate through already accessible funds would be hugely important to affected families.

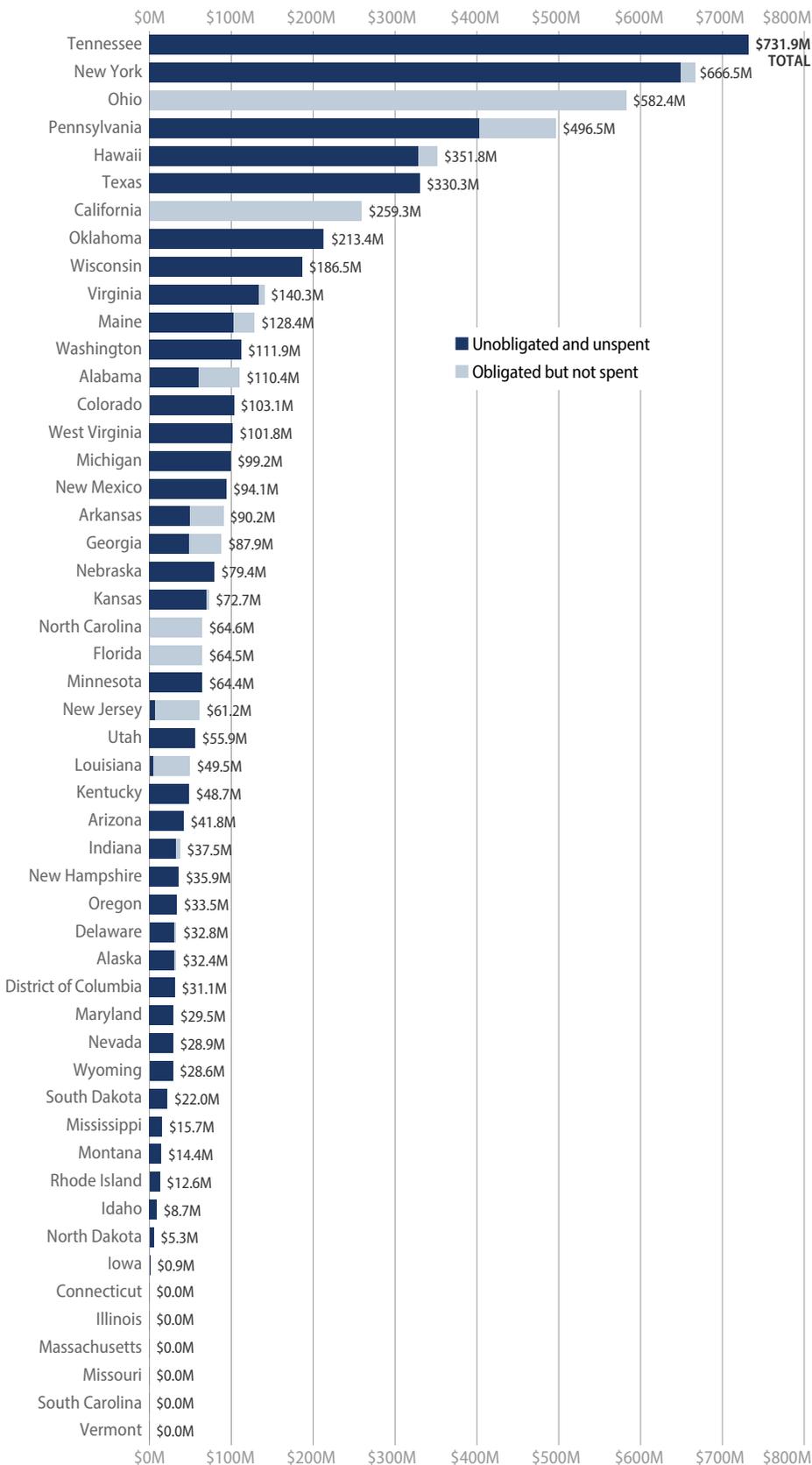
Distribute TANF reserve funds where they are needed the most

States right now should be committing to spending as much of their TANF reserves as necessary on basic cash assistance and other forms of direct aid for people in need during this public health and economic crisis. State governors often can take such action through simple executive orders, but they may sometimes need state legislative approval.

Back in April 2020, Ohio Gov. Mike DeWine (R) signed an executive order directing millions of dollars to Ohio food banks, farmers, homeless shelters, and emergency assistance.¹³ Also in April, Wisconsin Gov. Tony Evers (D) proposed using \$100 million of his state's \$175 million in TANF reserves to expand child care, cash assistance, housing assistance, and emergency assistance for TANF and non-TANF households alike, but the Wisconsin Legislature has taken no action on this proposal so far.¹⁴ (see Figure 1) All of the recommendations below suggest worthy uses of unspent reserve money and, combined with greater funding, would help many people who desperately need assistance.

FIGURE 1

Unspent TANF funds in millions of U.S. dollars by state, end of fiscal year 2019



Source: U.S. Department of Health and Human Services Office of Family Assistance, "TANF Financial Data - FY 2019," October 19, 2020, available at <https://www.acf.hhs.gov/ofa/resource/tanf-financial-data-fy-2019>.

Prioritize, expand, and boost direct cash assistance

The decline in cash assistance—which dropped from 71 percent, or \$14 billion, of TANF spending in 1997 to a mere 21 percent, or \$6.5 billion, in 2019¹⁵—has caused extreme poverty to become more cyclical and recessions to become more severe, especially for the poorest families.¹⁶ The average family receiving TANF cash assistance in 2019 saw just \$447 per month, compared with \$572 per month in 1997 after adjusting for inflation.¹⁷ When policymakers do boost cash assistance in response to heightened levels of economic need, this aid acts as both a life raft for families struggling to meet their basic needs such as food and shelter and as an effective anti-recessionary stimulus because those families spend basically all of that aid immediately.¹⁸

To meet the immense and growing need, states should prioritize cash assistance by expanding the number of people who are eligible for it and increasing the amount that recipients can receive through either regular benefits or an emergency assistance program. Boosted cash assistance can immediately go out to families already enrolled in the TANF program, and states should invest in improving administrative capacity within TANF agencies so they can more efficiently process applications and reach more families. More than 10 politically diverse states now have issued one- or two-time emergency assistance payments of hundreds of dollars per family.¹⁹ Some states only gave additional benefits to families already receiving TANF cash assistance, while others included families who are not enrolled but who had lost income due to the pandemic or would otherwise have qualified for TANF. (see Table 1) More emergency assistance for struggling families should go out in every state, with the extra assistance not counting as income when it comes to eligibility for other assistance programs. State MOE funds can and should be used, if necessary, for people and families who need the aid but are not eligible for assistance from federal TANF funds.

TABLE 1
State changes to TANF emergency cash assistance during COVID-19 pandemic

Changes to program	States that implemented changes
Provided temporary payments only to families already receiving TANF assistance	Eight states: Alabama, Delaware, Illinois, North Carolina, Oklahoma, Rhode Island, Virginia, West Virginia
Provided temporary payments to families not already receiving TANF assistance	Four states: Delaware, Virginia, Washington, West Virginia
Provided temporary payments to families regardless of whether they were already enrolled in TANF*	Two states: Pennsylvania, Tennessee

*The Wisconsin governor proposed using \$100 million of TANF reserves to expand child care, cash assistance, housing assistance, and emergency assistance, but this proposal has been ignored by the state Legislature.

Source: Based on the author's review of TANF changes in every state during COVID-19 using news sources and state government websites. The complete list of sources is on file with the author.

Longer-term benefit raises and expansions of who can receive assistance are also needed as the coronavirus crisis runs into 2021 and more families struggle to meet their basic needs. Local economies are suffering without extra cash assistance for low-income families, as families' lack of basic spending money further hurts already struggling businesses, leading to layoffs and closures and creating a whole new cycle of out-of-work people falling into poverty and despair. Expansions and increases of TANF cash assistance by themselves will not be enough to fully prevent this, but states should consider these measures as an important piece of any plan to stimulate local economies.

Subsidize jobs throughout the labor market

For at least the next decade, annual gross domestic product is projected to be lower than it would have been if not for the pandemic—and the unemployment rate is projected to be higher. Without significantly more government aid, particularly to consumers, business revenues will continue to be noticeably lower, and spending on workers will adjust accordingly.²⁰ Subsidized employment could help address the unemployment and underemployment crisis by increasing the number of jobs and hours available for work and allowing employers, especially small businesses with low margins, to expand more than they otherwise would have during the downturn and eventual recovery. In less than two years during the Great Recession, 39 states and Washington, D.C., turned \$1.3 billion from the federal government into more than 260,000 subsidized jobs.²¹

Industries, such as the service sector, that disproportionately employ low-wage workers, people of color, and women have been hit hardest by COVID-19-related layoffs.²² This means that the populations disproportionately hurt by the pandemic stand to gain the most from a robust subsidized jobs program, especially if a significant number of those subsidized jobs are targeted to the service and comparable industries when they safely reopen after the pandemic. Importantly, these are more than just jobs paid for by the government. Subsidized employment is a workforce intervention designed to give paid work experiences and on-the-job training to people with significant barriers to employment, such as those experiencing long periods of joblessness or underemployment. By doing so, it can improve the future employment outcomes of its participants.²³ Once up and running, these programs have had bipartisan support, with politicians across the country seeing first-hand how effective they can be.²⁴

Subsidized job programs could provide unemployed people with steady wages, give struggling businesses the ability to reopen or expand without facing immediately high labor costs, and stimulate local economies through increased disposable income and spending of subsidized workers and their families. States should direct TANF funds toward safe subsidized jobs that provide adequate personal protective equipment or can be done remotely until the public health emergency has ended. Some jobs that may not necessarily be considered “safe” but are vital to pandemic relief efforts—such as contact tracers, food distribution workers, teachers and school staff, and homeless and child welfare caseworkers—should also be subsidized on the condition that they follow

“[The] program will provide much-needed aid during this recession by enabling businesses to hire new workers, thus enhancing the economic engines of our local communities.”

— Haley Barbour, former Mississippi governor (R) from 2004–2012, on subsidized employment in September 2009.

COVID-19 safety guidelines. States should also follow the examples of Wisconsin and California, which implemented policies of continuing to pay the wages of participants in their subsidized employment or work-study programs for the hours previously agreed to even if those hours were cut or the participant was laid off due to the pandemic.²⁵

In September 2010, the federal government allowed funding for subsidized jobs to expire despite the fact that the country was still recovering from the Great Recession. This caused most states to end their subsidized employment programs too early, slowing down the economic recovery.²⁶ It is important this time around that governments continue subsidizing jobs even after the pandemic subsides and until economic indicators show that a full recovery has taken place.

Provide housing assistance

During the Great Recession, the federal government created the Homelessness Prevention and Rapid Re-Housing Program to prevent mass evictions, but when that ran out of funding in 2012, many states used TANF to cover some of the additional need.²⁷ In 2013, the U.S. Department of Health and Human Services (HHS) issued a memo saying that TANF funds can be used to address housing-related needs and that eligibility for housing assistance extends beyond just families receiving cash assistance.²⁸

States can use TANF—often in the form of NRST benefits—to prevent homelessness by adjusting cash benefit levels in relation to housing costs, providing a housing supplement to cash assistance, offering rent and security deposit assistance, and supporting homeless shelters and rapid rehousing programs. It is extremely urgent that states take action here in the absence of large-scale rent forgiveness, with as many as 30 million to 40 million people at risk of eviction in the coming months²⁹ and the Centers for Disease Control and Prevention’s eviction moratorium expiring at the end of the year.³⁰ States could also provide subsidies for utility payments to prevent utility shut-offs, vitally important when more than 179 million Americans are at risk of having their water and electricity shut off due to unpaid bills and expiring moratoriums, right as winter approaches.³¹

During the COVID-19 crisis, Massachusetts has offered emergency housing to eligible families at risk of homelessness through its Emergency Assistance program.³² Montana has provided emergency rent and security deposit assistance to eligible families in need, regardless of whether they were receiving TANF cash assistance before the pandemic.³³ New York state has used TANF funds to make emergency cash grants available for rent, utility, security deposit, or moving expense assistance for residents facing evictions or shut-offs.³⁴ And Ohio dedicated up to \$16 million in TANF funds to the Coalition on Homelessness and Housing in Ohio to ensure that homeless shelters can operate safely and to assist with homelessness prevention and rapid rehousing services.³⁵ (see Table 2)

TABLE 2
State changes to TANF nonrecurrent short-term benefits during COVID-19 pandemic

Changes to program	States that implemented changes
Introduced new rent, utility, security deposit, rapid rehousing, or homelessness prevention assistance	Four states: Montana, Massachusetts, New York, Ohio*
Increased TANF food benefit	One state: Maine

* Ohio allowed counties to reallocate a collective \$10 million from the Summer Youth Employment program to its Prevention, Retention and Contingency program, which offers nonrecurrent short-term benefits.

Source: Based on the author's review of TANF changes in every state during COVID-19 using news sources and state government websites. The complete list of sources is on file with the author.

Legal and financial services and other related administrative costs are also eligible to be covered by NRST benefits and could be very helpful as low-income families try to navigate this incredibly confusing time. Like in the early 2010s, a large emergency fund specifically for housing assistance should be the primary tool for preventing evictions and homelessness, but TANF can still help meet some of the need.

Support child care programs and subsidize child care costs

A significant amount of TANF funds—16 percent in 2019—already go toward child care,³⁶ and, as governors and mayors seek to reopen their economies, more people returning to work are going to need it. This surge in need has crashed into the reality that many child care programs permanently closed during the pandemic,³⁷ making affordable child care even harder to find, especially for essential workers coping with more intense and irregular hours.³⁸ Among health care professionals alone, about 30 percent, or 4.6 million parents, have children who are too young to stay home alone.³⁹

Child care programs are facing increased costs related to enhanced cleaning and sanitation requirements; providing safety protections for child care workers; and covering the cost of additional staffing to conduct temperature checks and support modified pickup and drop-off routines. At the same time, programs are seeing decreased revenue due to the smaller class sizes necessary to comply with social distancing guidelines during phased reopening. The perilous finances that most child care programs faced before the pandemic have left many unable to weather these financial stressors now.⁴⁰ A national survey of licensed child care providers found that without any government assistance, the nation could permanently lose almost 4.5 million licensed child care slots—49 percent of the pre-pandemic total.⁴¹

NRST benefits can help low-income workers pay for child care, while general TANF funds can help child care facilities expand their capacity and afford the added expenses of operating during a pandemic. Similar to housing assistance, the estimated \$50 billion needed for child care necessitates its own emergency fund from Congress,⁴² but both until then and once that is established, TANF funds can go to child care to help fill a little of the funding gap that threatens the child care industry.

Use other NRST benefits creatively

Aside from housing and child care, NRST benefits can go toward vouchers or additional emergency cash assistance to help people afford to meet basic needs such as food, clothing, transportation, and sanitary products when other forms of assistance have not been fully sufficient. None of these benefits have to go exclusively to people already receiving TANF cash assistance; they can be distributed more broadly. Another creative use for NRST benefits could be making up for lost wages,⁴³ especially with the \$600 UI boost having expired in July, the \$300 boost from lost wage assistance being limited to just six weeks,⁴⁴ and many people still out of work approaching their time limit to collect regular unemployment benefits.⁴⁵ Pennsylvania and Tennessee both distributed emergency cash assistance to families who lost wages, although the payments were not for the specific amount of wages lost.⁴⁶

At a time when so many people are already suffering and don't need the added stress of a bill they can't pay, NRST benefits could potentially even assist with often exorbitant end-of-life costs.⁴⁷ New York state already offered funeral and burial assistance but has increased the allowance for it from \$900 to \$1,700 during the pandemic.⁴⁸ And while Congress should absolutely increase SNAP benefits,⁴⁹ TANF funds can be used to offer additional food vouchers and to support food banks and food bank distribution programs⁵⁰ to help them cope with explosions in demand and not nearly enough supply.⁵¹ An executive order from Ohio Gov. DeWine allocated up to \$4.97 million in TANF funds to Ohio food banks,⁵² while Maine increased its worker supplement benefit—which uses TANF funds to provide money for food purchases on top of SNAP—from \$50 to \$100 per month.⁵³

NRST benefits can also help shelters and domestic violence programs address the increased need for services that has resulted from the pandemic and its related stressors. An April estimate from the United Nations projected that six months of sheltering in place could result in 31 million additional cases of domestic violence globally.⁵⁴ It is critical that states provide more money to programs that help shelter and support people with little means who need to get themselves and their children out of abusive situations.

Consider making other technical changes

As shown in Table 3, more than 30 states have adopted the safety protocol of waiving all in-person TANF eligibility interviews during the pandemic, either shifting to phone-only or suspending interviews altogether.⁵⁵ Maine, Michigan, Massachusetts, and Missouri also waived orientation for new recipients.⁵⁶ These practices should be implemented in every state and continue until the public health emergency is over.

TABLE 3

States' other technical changes to TANF programs during COVID-19 Pandemic

Changes to program	States that implemented changes
Waived in-person interviews*	35 states: Alaska, Arkansas, California, Connecticut, District of Columbia, Delaware, Florida, Hawaii, Illinois, Indiana, Kansas, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Montana, Nevada, New Jersey, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, Tennessee, Vermont, Washington, Wisconsin, Wyoming
Waived orientation	Four states: Maine, Michigan, Massachusetts, Missouri
Paused child support cooperation requirements	Seven states: District of Columbia, Minnesota, ¹ Maryland, ² Massachusetts, ³ New York, ⁴ North Carolina, Wisconsin ⁵
Suspended collection of debts or recoupment of overpayments	Three states: California, Connecticut, North Carolina
Continued paying subsidized wages even if hours were cut or work site was closed	Two states: California, Wisconsin
Worked with two-year colleges to distribute computers and provide internet access and equipment to support TANF and TANF-eligible career pathways students	One state: Arkansas

1. Minnesota has suspended sanctions for refusal to cooperate with child support and paused interest accruing on child support debt.

2. Maryland initially extended the time frame to comply with child support requirements for 90 days, but that expired on July 31.

3. Massachusetts said that a simple declaration that it is unsafe for the recipient to cooperate with child support enforcement is all the proof that is needed.

4. New York suspended sanctions for failure to comply with child support and offered sanction removal for previous failure to comply with child support.

5. Wisconsin is granting good-cause exemptions on child support noncooperation.

Source: Based on the author's review of TANF changes in every state during COVID-19 using news sources and state government websites. The complete list of sources is on file with the author.

* **Correction, June 24, 2021:** This table has been updated to reflect that Louisiana, Oregon, and Wyoming also waived in-person interviews.

Additionally, the 12 remaining states that still place family caps on TANF benefits, which bar households from receiving additional cash assistance for any children born while the family is enrolled in TANF, should move quickly to follow the recent examples of Massachusetts and New Jersey by eliminating those caps and retroactively providing the rightful benefits to families hurt by this policy.⁵⁷

Meanwhile, child support cooperation requirements could be particularly onerous to meet for noncustodial parents who have lost all sources of income,⁵⁸ and parents who have experienced domestic violence could worry for their or their child's safety if forced to provide their address in order to receive child support payments.⁵⁹ Although caseworkers have significant discretion to provide good-cause exceptions, particularly for domestic violence,⁶⁰ TANF recipients who are survivors of domestic violence may not feel comfortable disclosing sensitive information to the assigned caseworkers—who are working mostly over the phone now—and a blanket order from the state to temporarily pause all child support cooperation requirements would be more effective. Minnesota suspended sanctions for refusal to cooperate with child support and paused accrual of interest on child support debt.⁶¹ New York state also suspended sanctions for noncooperation with child support and offered some sanction removal for previous failure to comply with child support.⁶²

Broaden eligibility for TANF benefits

Despite serving more than 1 million families nationwide in 2019, TANF programs provided cash assistance to only 23 families for every 100 in poverty.⁶³ If TANF had the same reach now as it did when it was created in 1996—serving 68 for every 100 families in poverty—2 million more families would have been receiving cash assistance even before the current economic crisis began.⁶⁴ With almost two unemployed workers for every job opening⁶⁵ and potentially more than 13 million people facing the loss of their unemployment benefits by the end of the year if Congress ever lets the Coronavirus Aid, Relief, and Economic Security (CARES) Act programs expire,⁶⁶ a lot of people are right on the edge of having no major source of income for the foreseeable future. That level of need makes clear how important it is to not just to increase the amount of TANF benefits but also to expand how many people are eligible for them and prevent anyone currently receiving TANF benefits and still in need from losing them.

Suspend all work and work-search requirements and sanctions

Unemployed workers should not be faulted and penalized for a seriously contracted job market and the unsafe working conditions caused by the pandemic. In normal times, states will often excuse participation in work activities for good cause on a case-by-case basis, but in this scenario, that would be administratively burdensome and send the message that most recipients are still expected to meet work requirements. States have the power to make a blanket determination that the COVID-19 pandemic constitutes good cause for all TANF participants, and they should use it.⁶⁷ HHS put out guidance indicating it will treat COVID-19 as a natural disaster to grant relief from penalties to any state that does not meet work participation rate requirements.⁶⁸ At least 37 states have already taken the initiative to suspend or issue blanket good-cause exemptions from work, work-search, and other reporting requirements attached to TANF benefits during the pandemic.^{69*} At least three states—Indiana, Kentucky, and Massachusetts—have also suspended their pre-benefit job search requirements.⁷⁰ (see Table 4)

TABLE 4
State changes to TANF work requirements and sanctions during COVID-19 pandemic

Changes to program	States that implemented changes
Formally suspended or granted good-cause exemptions from work requirements**	37 states: Alaska, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, Florida, Georgia, Hawaii, Illinois, Indiana, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Missouri, Nebraska, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oregon, Pennsylvania, Rhode Island, South Carolina, Texas, Vermont, Virginia, Washington, Wisconsin
Suspended pre-benefit job search	Three states: Indiana, Kentucky, Massachusetts
Paused or lifted existing sanctions	Five states: California, Illinois,* New York, North Carolina, Washington

* Illinois is granting good-cause exemptions from existing sanctions if contacted by sanctioned recipient.

Source: Based on the author's review of TANF changes in every state during COVID-19 using news sources and state government websites. The complete list of sources is on file with the author.

** **Correction, June 24, 2021:** This table has been updated to reflect that Connecticut, Georgia, Louisiana, Ohio, Oregon, and Wisconsin also formally suspended or granted good-cause exemptions from work requirements.

Sanctions for individuals who fail to meet these requirements also should be frozen through the duration of the public health emergency. All the states that suspended work requirements have in effect suspended sanctions as well, although further clarification that failing to meet reporting and other requirements will not lead to sanctions may be needed. Past circumstances should have no bearing on who gets help during this crisis either. New York state and Washington state have allowed TANF families to receive cash assistance during the pandemic even if they have outstanding sanctions,⁷¹ and Illinois, California, and North Carolina have paused or offered the opportunity to cure existing sanctions.⁷² Anyone who owes money for past sanctions should have that paused or forgiven and be allowed to receive their full cash assistance and other benefits, while families who have been kicked off TANF for sanctions or violations should be reenrolled.

Freeze lifetime use limits and recertification determinations

States are bound by federal law to set lifetime use limits for receiving cash assistance from federal TANF funds,⁷³ with some small exceptions, at no longer than 60 months.⁷⁴ Many states have lifetime limits much shorter than that.⁷⁵ A few states and jurisdictions, such as Washington, D.C.,⁷⁶ use MOE funds to continue paying cash assistance after a family passes the five-year time limit, and there are hardship exemptions that allow states to use federal TANF funds beyond 60 months for up to 20 percent of a state's caseload.⁷⁷

No one should live under the threat of exhausting their benefits during the pandemic. All benefits, including cash assistance, received from TANF throughout this economic downturn should not count toward time limits. In the absence of action from Congress or new guidance from HHS, states should shift the cash assistance they are distributing to MOE funds and amend their policies to not count MOE cash assistance received during this downturn toward lifetime use limits. States should also look to provide cash assistance using MOE funds for families affected by this pandemic who had previously passed their lifetime limit for TANF support.

During at least some of the pandemic, a few states, including California and Connecticut, stopped counting benefits received toward recipients' time limits.⁷⁸ (see Table 5) A few other states such as Maine and Minnesota have allowed those who reach their time limits to stay on during the public health emergency.⁷⁹ Maine has even been allowing those who had previously been kicked off TANF for passing their time limit to reapply during the pandemic.⁸⁰ Every state should be following these examples. Additionally, at least 23 states automatically recertified or extended TANF cases that were up for renewal for several months without any need for the normal recertification procedures; however, for many, this was only a one-time extension and is not being repeated for cases that are coming up for renewal now.^{81**} Every state should automatically renew or extend TANF benefits by six months for every case review that comes up until the public health and economic crisis has passed.

TABLE 5
State changes to TANF recertifications and time limits
during COVID-19 pandemic

Changes to program	States that implemented changes
Automatically extended or recertified for two to six months*	23 states: Alaska, Arizona, California, Colorado, Delaware, Florida, Georgia, Indiana, Iowa, Kentucky, Maryland, Massachusetts, Minnesota, New Hampshire, New Jersey, New York, Ohio, Rhode Island, Tennessee, Texas, Virginia, Washington, Wisconsin
Did not count use during COVID-19 toward time limit ¹	Five states: Alaska, California, Connecticut, Delaware, Massachusetts
Allowed those who reach time limit to stay on during COVID-19 ²	Six states: Maine, Minnesota, New Hampshire, Rhode Island, Washington, Wisconsin
Allowed those who had previously passed time limit and were kicked off to reapply during COVID-19	One state: Maine

1. The Arizona Legislature proposed waiving time limits, but the bill has not been passed into law.

2. Some states, including New York, Vermont, and Washington, D.C., already offered some benefits to residents beyond their lifetime use limits using state maintenance-of-effort funds. Additionally, federal law permits states to use federal TANF funds to continue providing assistance beyond the time limit to child-only cases, as well as up to 20 percent of the state's caseload each year due to hardship.

Source: Based on the author's review of TANF changes in every state during COVID-19 using news sources and state government websites. The complete list of sources is on file with the author.

*Correction, June 24, 2021: This table has been updated to reflect that Arizona and Ohio also automatically extended or recertified for two to six months.

Increase the TANF income threshold and base eligibility on expected income

For the duration of this economic downturn, the maximum eligible income should be raised to at least 200 percent of the federal poverty line.⁸² Under current law, many state TANF administrators are already able to make families who experience a significant drop in income eligible for benefits, and others should quickly change policy or issue guidance to follow suit.⁸³ Under existing TANF guidelines, states have broad authority to alter their income thresholds in order to expand their beneficiary population.⁸⁴ While none have done so for receipt of TANF cash assistance during the pandemic, California did expand eligibility for diversionary payments—larger one-time payouts in place of monthly benefits—to families making up to 200 percent of the poverty line.⁸⁵ And in April, the New Jersey Legislature passed a bill that would, among other improvements, permanently increase income eligibility thresholds, but the bill has since stalled.⁸⁶

States typically base TANF eligibility on the past month's income, but the salary a person previously made gives no indication of their earnings capacity when they are laid off, their hours have been cut, or their employers are shut down. If a person loses their job, this practice could delay benefits they should be receiving immediately. During the pandemic, Wisconsin started allowing people who applied for emergency assistance, although not regular cash assistance, the option to project income for the next 30 days instead.⁸⁷ (see Table 6) All states should look into speeding up how quickly families can receive benefits by letting applicants use expected income if it would help qualify them.

TABLE 6

State changes to TANF income eligibility during COVID-19 pandemic

Changes to program	States that implemented changes
Did not count Federal Pandemic Unemployment Compensation as income for eligibility	Six states: California, Delaware, Hawaii, Indiana, New Hampshire, North Carolina
Did not count state unemployment insurance as income for eligibility	One state: Hawaii
Allowed applicants to project income for next 30 days for eligibility purposes rather than using past month's pay	One state: Wisconsin
Expanded eligibility for diversion payments to up to 200 percent of the federal poverty line	One state: California
Increased asset limits*	Two states: Michigan ¹ , Oregon
Used presumptive eligibility where possible ²	One state: Alaska

1. Michigan raised asset limits only for its State Emergency Relief program, not for all TANF recipients.

2. The New Jersey Legislature passed a bill that would have given presumptive eligibility during the pandemic, while permanently increasing benefit amounts and income eligibility thresholds, as well as expanding eligibility and what counts for work requirements, but the bill was conditionally vetoed by the governor.

Source: Based on the author's review of TANF changes in every state during COVID-19 using news sources and state government websites. The complete list of sources is on file with the author.

* Correction, June 24, 2021: This table has been updated to reflect that Oregon also increased asset limits.

Moreover, at least six states—California,⁸⁸ Delaware,⁸⁹ Hawaii,⁹⁰ Indiana,⁹¹ New Hampshire,⁹² and North Carolina⁹³—did not count the \$600 federal boost to UI, which a TANF applicant might have received, as income when determining eligibility, and Congress prohibited all states from counting the economic impact payments in the CARES Act as income.⁹⁴ Two states went even further, with North Carolina excluding Pandemic Unemployment Assistance and Pandemic Emergency Unemployment Compensation and Hawaii excluding state UI payments from TANF eligibility calculations.⁹⁵ Unemployment benefits alone are not enough to meet a modest family budget basically anywhere in the country,⁹⁶ so states should use TANF to supplement those benefits until recipients are able to find steady work again. Counting UI and economic impact payments as income for TANF eligibility could disqualify a significant number of people who still need more help paying bills and putting food on the table.

Allow childless adults to sign up at least during the recession

Even if a person is legally classified as a childless adult, they often support other people, including noncustodial children and elderly parents or other family members.⁹⁷ They may be soon-to-be parents⁹⁸ or have a disability that prevents them from working.⁹⁹ All of these situations create additional need for these households that is unaccounted for by the current TANF program, which limits its support to adults living with their custodial children or children who live with an adult who is not their parent and is not included in the benefit calculation. States should at least temporarily expand TANF benefits for the duration of the economic downturn to those without custodial children who meet the income eligibility standards.

Consider other eligibility changes

States should consider automatically enrolling families in cash assistance or other TANF benefits if their records are already on file with the state because of an application to another program that indicates they would be eligible. Another alternative would be giving automatic qualification to anyone receiving similar benefits through programs such as SNAP or UI, with certain wage or benefit levels triggering access to TANF. Speeding up the processing of applications and distribution of benefits is important as families are increasingly being forced to decide between paying bills and eating.

Removing or suspending asset limits for TANF recipients would ease fears of losing benefits just because one has a small amount of money in savings.¹⁰⁰ It would also expand the pool of eligible families¹⁰¹ who need and deserve the help, while actually saving states money.¹⁰² In March, Michigan increased the noncash asset limit for its State Emergency Relief program to \$15,000, while Oregon has increased its asset limit for new TANF applicants from \$2,500 to \$10,000.^{103***} This does not apply to regular TANF cash assistance, however. As of 2018, 42 states and Washington, D.C., had asset limits for TANF recipients in place, most set at no more than a few thousand dollars.¹⁰⁴

Additionally, half of states do not include a child support pass-through and disregard in their TANF programs.¹⁰⁵ Those should be implemented everywhere, and the states that have them in place already should increase the percentage of child support that gets passed through, keeping more money in the hands of families who need it. More generally, no state should enact any policies that will result in smaller caseloads or fewer benefits for individual recipients during the coronavirus crisis.

Conclusion

Tens of millions of people have had their livelihoods upended this year. Without bold action, large segments of the U.S. population could be permanently left behind, even long after the worst of this crisis has subsided. With unemployment likely to remain very high for at least the next several years¹⁰⁶—and the people most affected overwhelmingly being low-income workers, communities of color, and women¹⁰⁷—there is an urgent need to focus aid on those feeling the biggest impacts from the COVID-19 pandemic and its economic fallout.¹⁰⁸

Without additional funding from the federal government, TANF does not have the capacity to get all of the aid to everyone who needs it. However, states can still use TANF in its current form and existing funds in much more effective ways than they presently are. In times of crisis such as this one, extra assistance can be used as a supplement to other sources of income and benefits to help people survive until the

crisis has passed and they're able to find steady work again. States should be doing everything in their power to get help to those with the greatest need right now, and that must include reprioritizing TANF and MOE spending and changing eligibility rules to ensure that as many people in need receive as much assistance as possible.

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** **Correction, June 24, 2021:** This issue brief has been updated to state the accurate number of states that have taken the initiative to suspend or issue blanket good-cause exemptions from work, work-search, and other reporting requirements attached to TANF benefits during the pandemic.*

*** **Correction, June 24, 2021:** This issue brief has been updated to state the accurate number of states that automatically recertified or extended TANF cases that were up for renewal for several months without any need for the normal recertification procedure.*

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