

## APPENDIX A: TANF PROGRAM STRUCTURE, SIZE, AND ELIGIBILITY

TANF is a United States federal block grant that states and Washington, DC receive to provide income assistance, job training, and other supportive services to low-income families with children.<sup>1</sup> Federal TANF income assistance consists of up to 60 months of direct cash assistance for eligible families.<sup>2</sup> Benefit levels are based on the number of eligible household members and income. For instance, a family of three in Washington, DC, with no more than \$8,016 in annual income, could receive up to \$508 a month, or \$6,096 a year (Lassiter 2017).

In 2014, about 27% of households on TANF nationally had at least one adult working full time; 17% had at least one adult working part time (and none full time); 12% had at least one looking for work (and none working); and 44% had no adults in the labor force. For families to be eligible for TANF, heads of household must meet financial and technical eligibility requirements covering residency, citizenship, dependents, income, assets, and employment.<sup>3</sup> Additional conditions of eligibility include cooperation with child support, participation in work activities, and compliance with substance abuse provisions.

During the 2015 fiscal year, total TANF expenditures in the District were \$266.9M (U.S. Department of Health and Human Services 2017a). That includes about \$70M in basic cash assistance; \$60M in child care; \$52M in short-term and emergency aid; and \$37M to vendors who provide work readiness, job placement, retention services, and barrier remediation assistance through the TANF Employment Program. About 5,000 families are enrolled in the DC TANF program during a typical month (U.S. Department of Health and Human Services 2017b).<sup>4</sup> Forty-four percent of those without disabilities engage with case management and work activities through the TANF Employment Program (DC Action for Children 2016).

### TANF Continuation and Recertification

Nationally, 21 percent of families receiving TANF have their cases closed each year for failure to comply with TANF eligibility requirements. These include families that fail to appear at appointments, submit required documentation, or cooperate with requirements (U.S. Department of Health and Human Services 2017a). Within Washington, DC, the Department of Human Service (DHS) Economic

<sup>1</sup>Federal guidelines allow states to use federal TANF funding on programs or services that meet one of the four main purposes: assist needy families so that children can be cared for in their own homes; reduce dependency by promoting job preparation, work, and marriage; prevent out-of-wedlock pregnancies; and encourage the formation and maintenance of two-parent families. In order to receive federal TANF funds, DC and the states are required to spend a set amount of their own funds on programs for TANF-eligible families. This is referred to as a maintenance of effort (MOE) requirement. Most of the TANF and MOE funds spent in the District are used to support DC's welfare-to-work program. Some TANF block grant funds are used for other services, such as homeless services and family preservation.

<sup>2</sup>Over the course of the lifetime for federal funds. DC (and states) can continue issuing TANF benefits after 60 months from their own local funds.

<sup>3</sup>In Washington, DC, they must be a DC resident; be either pregnant or responsible for a child under 19 years of age; be a U.S. national, citizen, legal alien, or permanent resident; have low or very low income; have less than \$2,000 in assets; and be either under-employed, unemployed, or about to become unemployed (U.S. Department of Health and Human Services 2017c).

<sup>4</sup>This corresponds to approximately 12,300 adults and children. Because TANF cases are defined as all eligible members in eligible households, we use the terms recipient, household, and families interchangeably unless otherwise noted.

Security Administration administers the program.<sup>5</sup> DHS began enforcing a new recertification process for households to maintain TANF eligibility starting in late 2016.<sup>6</sup> At the time of the study, after each 12 months of benefits, TANF recipients in DC are required to recertify their eligibility by completing a benefits application and supplying necessary documentation in-person at a DHS Service Center (D.C. Department of Human Services 2015).<sup>7</sup> Any household who fails to recertify in a timely fashion is no longer eligible for TANF and its participation is terminated. Subsequently, households seeking to access future benefits must go to a DHS Service Center to complete a *new* TANF application and supply necessary documentation. Reapplying after failing to recertify can have severe administrative and benefit consequences, compared to recertifying.

Importantly, at the time of the study, some prior recipients might have no longer qualified because eligibility rules related to income differed between recertification and initial application. For instance, when recertifying, eligibility was assessed on the household's monthly earned income minus a \$160 work expense deduction and disregarding two-thirds of remaining earned income; eligibility for newly-applying households, however, did not allow for the two-thirds disregard (D.C. Department of Human Services 2017). New applicants also may be required to re-complete the TANF orientation, comprehensive assessment, and Preliminary Individual Responsibility Plan, which details needs and plans for obtaining work (Seymour 2017). Whereas the recertification application takes approximately 45 minutes to complete, a new application takes one hour, and the TANF orientation and comprehensive assessment another 1.5 hours. As recertification requires less work than starting a new application, it would generally be a better choice for individuals who wish to continue receiving benefits. However, recertification requires recipients to make an active decision rather than choose the default option of doing nothing. Since people tend to accept default options even when they are not optimal, this may also help explain why many recipients fail to recertify despite the additional burden they will encounter (Choi et al. 2005).

Mailed letters are DHS's primary mechanism for informing customers about the recertification requirement. An Initial Notice is mailed at least 60 calendar days prior to a household's recertification deadline (Supplementary Figure 1 shows a timeline). This notice informs customers of the requirement and the necessary proofs to be presented, and it suggests a specific "appointment" date and DHS Service Center for the customer to visit to complete recertification (see Appendix C for this notice).<sup>8</sup> Those dates are intended to smooth staffing needs at DHS Service Centers by modulating demand and balancing DHS workload. TANF recipients can recertify their eligibility at any Service Center during business hours any day and time during their recertification period and are seen on a "first come, first served" basis.<sup>9</sup> If a customer does not visit a Service Center, they will receive a Termination

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<sup>5</sup>For details, see <http://dhs.dc.gov/service/temporary-cash-assistance-needy-families-tanf> and the overview at <http://www.dcfpi.org/wp-content/uploads/2012/02/3-21-12-TANF-Overview.pdf>.

<sup>6</sup>For the prior four years, DC TANF cases were closed manually and recipients were not systematically required to recertify their eligibility. Beginning December 31, 2016, cases are automatically terminated if eligibility is not recertified by the deadline.

<sup>7</sup>Technically, eligibility may vary month-to-month. However, there is little incentive for households proactively to establish eligibility independent of the 12 month recertification requirement. Service Centers process eligibility for TANF, SNAP, Interim Disability Assistance, Medicaid, Healthcare Alliance/Immigrant Child Program. Program services are provided at other locations by different staff.

<sup>8</sup>To construct "appointments", DHS evenly divides recertifying clients in each Service Center among the business days between the 25th of the month prior to the deadline and the 14th of the month of the deadline (e.g., Monday, June 26, 2017 - Friday, July 14, 2017 for those whose eligibility expires July 31, 2017).

<sup>9</sup>The Initial Notice from DHS recommends a specific date (and DHS Service Center) for recertification: "Please bring the information to [Service Center] on [scheduled date of renewal appointment]." Regardless of the

Notice (Appendix D) 15 days prior to their deadline.<sup>10</sup> DHS also makes general information about the recertification requirement available through their website and TANF program materials.

There may be room to expand current communication efforts to reach more eligible households. In the first quarter of 2017, one in two (50 percent of) DC families on TANF successfully recertified their eligibility and maintained their benefits. The remaining families were removed from the TANF rolls and their participation terminated. The overwhelming majority of these families failed to comply with the recertification process: either they did not appear at a Service Center to recertify (44 percent) or they appeared but failed to bring all the necessary proofs (4 percent).

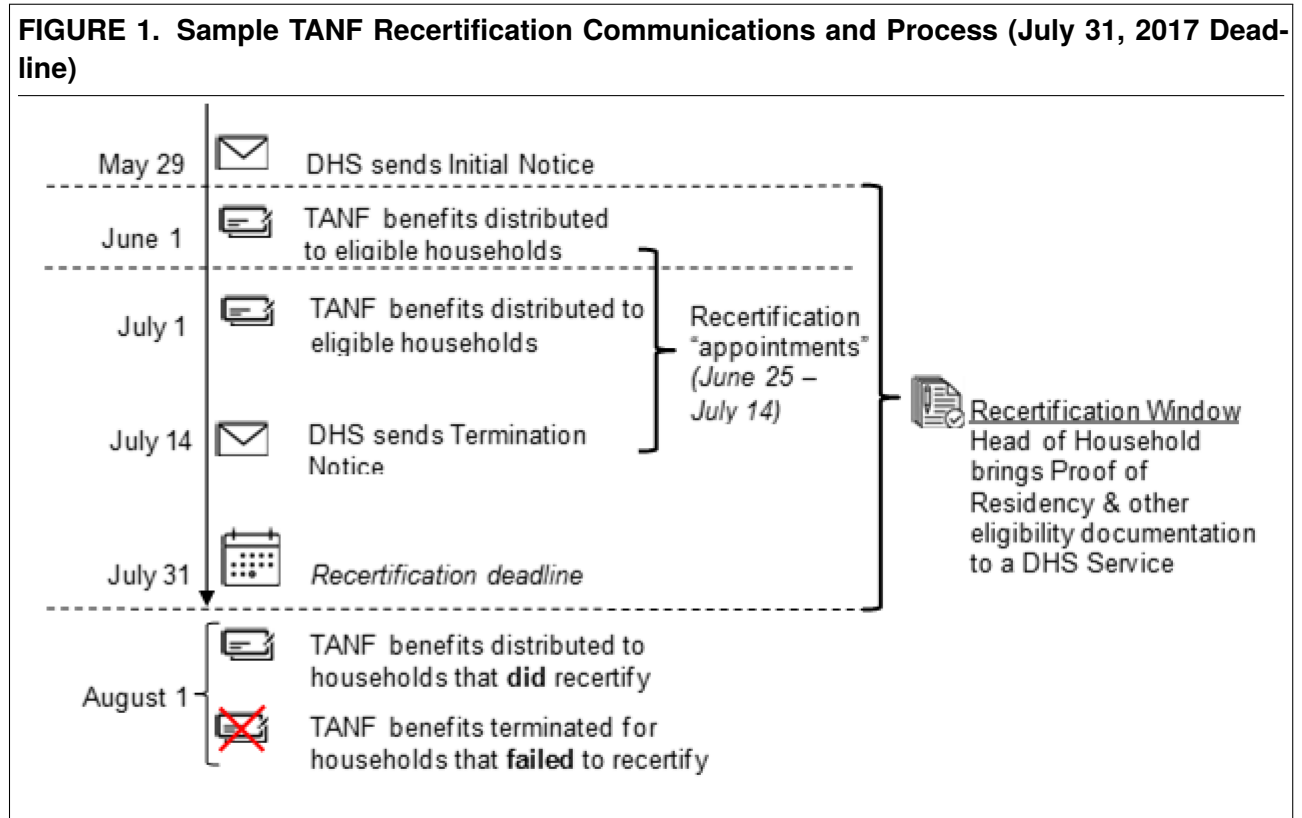
The recertification process is designed to ensure families who are eligible continue to receive benefits, while terminating participation for families who no longer qualify. Through the recertification process, a minority of households (less than 1 percent) have their cases closed because they no longer meet eligibility requirements — these few visit a Service Center and are affirmatively denied renewal. The vast majority of families who go through the recertification process successfully renew. It is possible that those who do not visit a Service Center self-select out of the process because they are no longer eligible. However, there is evidence that a significant number of otherwise eligible households have their benefits terminated simply for failing to recertify by the deadline. In the first quarter of 2017, 34 percent of families whose benefits were terminated reapplied, and were approved for, DC TANF benefits within 90 days of termination. In the absence of the recertification requirement, they would have remained eligible and continued their participation uninterrupted.

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“appointment” date provided, recipients have until the end of the month to recertify and the recommended date does not guarantee that they will be seen by DHS staff that day.

<sup>10</sup>The Termination Notice states that “your Temporary Assistance for Needy Families benefits will terminate on <termination date> because <reason>.” While not explicitly stated in the notice, all customers who recertify in advance of the deadline—even if they have received a Termination Notice—can maintain their TANF eligibility.

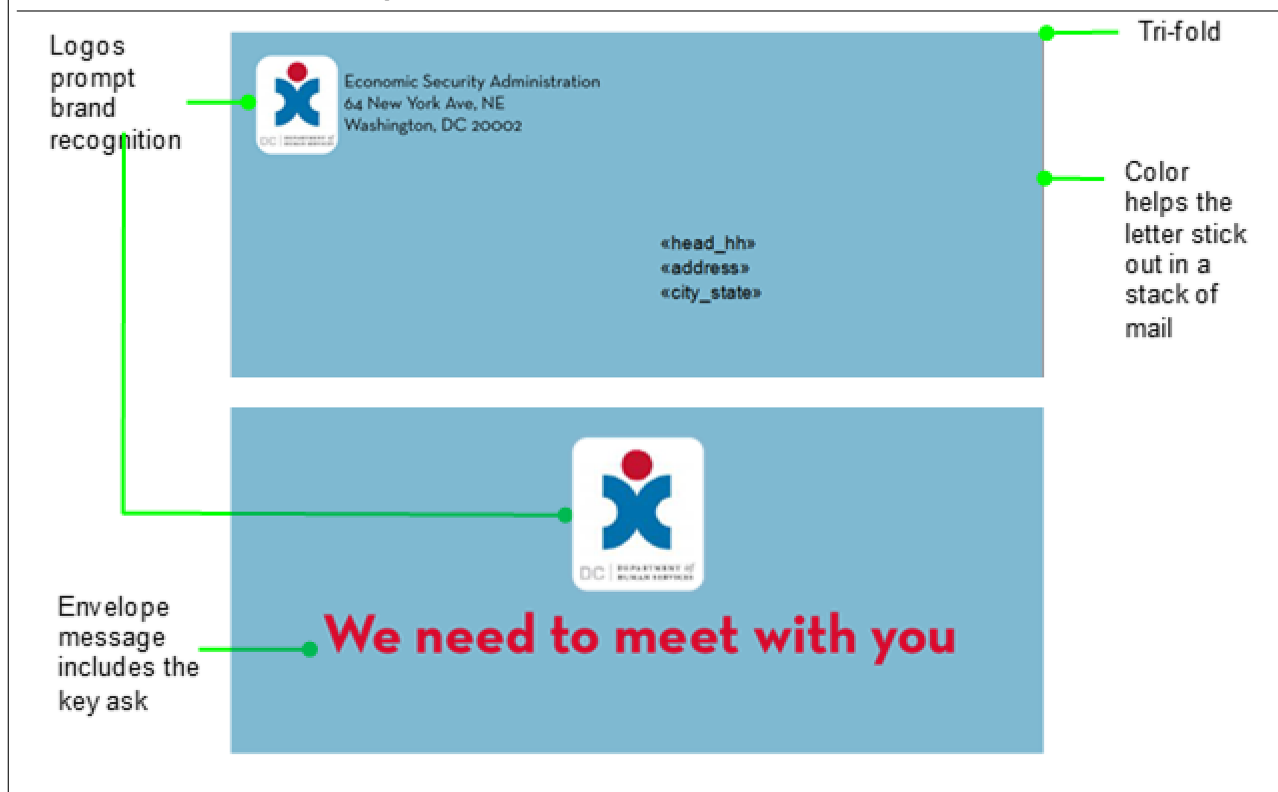
**APPENDIX B: SUPPLEMENTARY FIGURES AND TABLES**



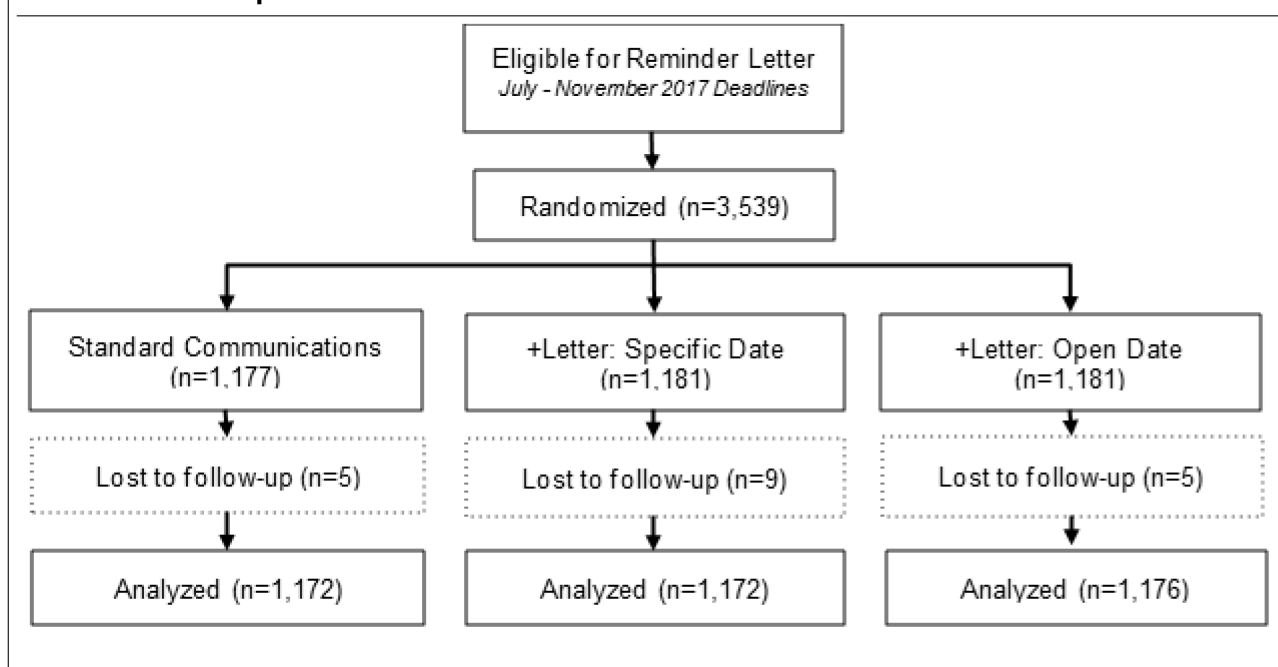
**TABLE 1. Sample Composition and Timing**

	July	August	September	October	November
Random Assignment Sample					
No Letter	242	257	242	177	259
Specific Date	243	258	242	178	260
Open Date	241	259	242	178	261
<b>Total</b>	<b>726</b>	<b>774</b>	<b>726</b>	<b>533</b>	<b>780</b>
Timelines					
Initial Notices mailed	5/31	7/1	7/30	8/30	9/30
Data pulled for sample	6/12	7/10	8/15	9/12	10/6
Reminder letters mailed (if applicable)	6/19	7/18	8/18	9/15	10/13
Suggested appointment dates	6/26-7/14 (not 7/4)	7/25-8/14	8/25-9/14 (not 9/4)	9/25-10/13 (not 10/9)	10/25-11/14 (not 11/10)
Deadline to Recertify	7/31	8/31	9/29	10/31	11/30

**FIGURE 2. View of “Envelope” (Front and Back)**



**FIGURE 3. Participant Flow**



**TABLE 2. Percentage Achieving Each Outcome, by Experimental Condition (no letter vs. any letter)**

	No Letter <i>n</i> = 1172	Any Letter <i>n</i> = 2348	Difference (95% CI)
Started Recertification	41.8%	47.4%	5.6pp* (2.1, 9.0pp)
Complied with Requirements	40.7	45.9	5.2pp* (1.7, 8.7pp)
Successful Recertification	40.1	45.6	5.5pp* (2.1, 9.0pp)

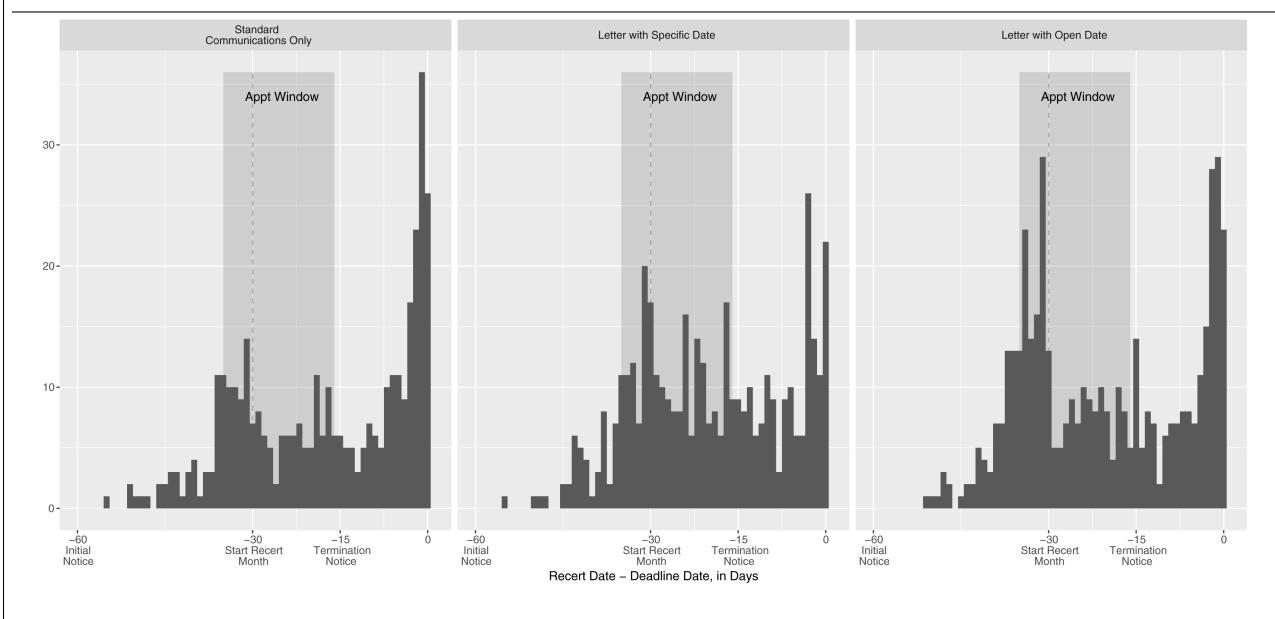
Note: \* Statistically significant at the  $\alpha = 0.05$  level.  
All percentages listed are from the total number assigned to that condition.

**TABLE 3. Percentage Achieving Each Outcome, by Experimental Condition (specific date vs. open date)**

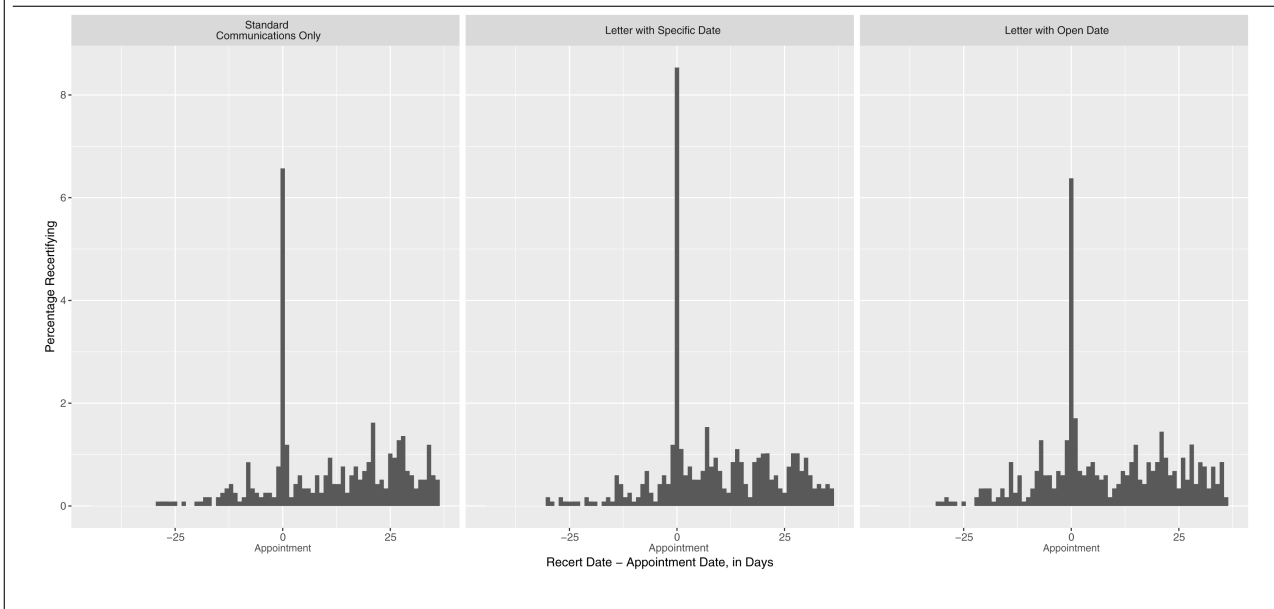
	Letter: Specific Date <i>n</i> = 1172	Letter: Open Date <i>n</i> = 1176	Difference (95% CI)
Started Recertification	46.8%	48.0%	1.2pp (-2.8, 5.2pp)
Complied with Requirements	45.1	46.7	1.5pp (-2.5, 5.6pp)
Successful Recertification	44.8	46.4	1.6pp (-2.4, 5.7pp)

Note: All percentages listed are from the total number assigned to that condition.

**FIGURE 4. Relative to Calendar Day, Number of Recertifications Daily, by experimental condition**



**FIGURE 5. Relative to “Appointment Day”, Percentage of Households that Recertify Daily, by experimental condition**



## APPENDIX C: INITIAL NOTICE

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
DEPARTMENT OF HUMAN SERVICES



Notice Date: 10/29/2016

Account ID: [REDACTED]  
Person ID: [REDACTED]  
[REDACTED]  
WASHINGTON, DC [REDACTED]

FORT DAVIS SERVICE CENTER(671)  
3851, Alabama Avenue, SE  
Washington, DC 20020  
Phone number: (202) 645-4500  
Fax Number: (202) 645-6205

**Subject: Cash Assistance Renewal**

Dear [REDACTED],

Your eligibility for Temporary Assistance for Needy Families needs to be reviewed. Without this review your benefits will be terminated. We need the information listed below so that we can determine whether you are still eligible to get benefits:

- We need proof that you are still a District resident
- We need to verify school attendance for 18 and 19 year old household members.
- We need to verify if anyone moved-in to your household.

Please bring the information to FORT DAVIS SERVICE CENTER(671) on [REDACTED]/2016. If you cannot go to this Service Center you may go to any of the Service Centers on the attached Service Center Address sheet.

**If You Cannot Keep the Appointment**

If you cannot keep the appointment, please contact (202) 727-5355 or before 12/2016 or you may go to any of the Service Centers listed on the attached form. If you fail to keep your scheduled appointment, we cannot determine if you are eligible for benefits. Without this review your benefits may be terminated.

**ESA Manual Citation: Part II, Chapter 2, Section 2.3**

**If You Think We Made a Mistake**

If you do not agree with the decision we made, the household may request a fair hearing within 90 days of the date of this notice. Read the attached Hearing Rights to learn how to request a hearing and for a list of organizations that may provide free legal representation. You may request a hearing orally or in writing.

If you have questions, please call (202) 727-5355. If you are Hearing Impaired, you may call TTY/TDD 711 (855) 532-5465.



## APPENDIX D: TERMINATION NOTICE

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
DEPARTMENT OF HUMAN SERVICESSubject: **Cash Assistance Termination**

Dear [REDACTED]

Your Temporary Assistance for Needy Families (TANF) benefits will terminate [REDACTED] because &lt;Insert reason&gt;.

Condition:	Reason:
<b>Disqualified Recipient for IPV Institutionalized</b>	you were found to have committed public assistance fraud and this is your third offense, so your needs will be permanently removed from your household's TANF benefit. (D.C. Official Code § 4-218.01(c))
<b>No longer living in the same household as the dependent child</b>	your benefits have been terminated because you are in a hospital, group home, or nursing home and no longer meet the standard to be included in the TANF assistance unit because you are not living in the same household as the dependent child. (45 C.F.R. § 260.20(a); 42 U.S.C.S. § 608(a)(1); D.C. Official Code § 4-205.15)
<b>[if gross income exceeds max allowable]</b>	Your benefits have been terminated because you no longer meet the standard to be included in the TANF assistance unit because you are not living in the same household as the dependent child. (45 C.F.R. § 260.20(a); 42 U.S.C.S. § 608(a)(1); D.C. Official Code § 4-205.15)
<b>[if not a d.c. resident]</b>	your gross income exceeds the maximum allowable limit. (D.C. Official Code § 4-205.10(a))
<b>[if disqualified misrepresented residency]</b>	you are no longer a District resident. (D.C. Official Code §§ 4-205.03-.04, 4-205.53)
<b>[if loss of contact / no response from client]</b>	you were found to have misrepresented your residency to get benefits from two or more States, so your needs are removed from your household's TANF benefit for ten (10) years. (D.C. Official Code § 4-205.69)
<b>Verifications not provided</b>	we could not establish contact with you. 7 CFR 273.13
<b>[Failure to provide requested information]</b>	part of the application process is providing requested information and we did not receive the information we requested from you (for example: living with statement(s), proof of citizenship status, income, etc.) ESA Policy Manual Part III, Chapter 1, Section 1.1 and Part III, Chapter 2, Section 2.1 and D.C. Official Code §§ 4-205.19(a), and .31(a).
	you have not provided of all the information we requested from you. ESA Policy Manual Part III, Chapter 1, Section 1.1 and Part III, Chapter 2, Section 2.1 and D.C. Official Code §§ 4-205.05a, .19(a), and .31(a)

**If You Think We Made a Mistake**

If you do not agree with the decision we made, the household may request a fair hearing within 90 days of the date of this notice. Read the attached Hearing Rights to learn how to request a hearing and for a list of organizations that may provide free legal representation. You may request a hearing orally or in writing.

If you have any questions please call (202)724-5506. If you are Hearing Impaired, you may call TTY/TDD 711 (855) 532 5465