A Report by the

NATIONAL ACADEMY OF PUBLIC ADMINISTRATION

for the D.C. Department of Human Services

DC TANF and the 2025 Public Assistance Amendment Act: Stakeholder Perspectives on Implementation

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DC TANF and the 2025 Public Assistance Amendment Act: Stakeholder Perspectives on Implementation

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About the D.C. Department of Human Services

The mission of the D.C. Department of Human Services is to provide meaningful and equitable services, supports, and access to resources to help District residents realize their goals. Within DHS, the Economic Security Administration (ESA) oversees public benefit delivery to District citizens. They manage service centers and online services that help customers interact with TANF, along with SNAP, ERAP, and other programs.

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Acronyms, Key Terms, and Concepts

Acronyms

2025 Act	2025 Public Assistance Amendment Act
AFDC	Aid to Families with Dependent Children
DHS	District Department of Human Services
POWER	Program on Work, Employment and Responsibility
PRWORA	Personal Responsibility and Work Opportunities Reconciliation Act of 1996
SNAP	Supplemental Nutrition Assistance Program
SSI	Supplemental Security Income
TANF	Temporary Assistance for Needy Families
TEP	TANF Employment and Education Program

Key Terms and Concepts

The following terms describe how TANF participation, enforcement, and protections work together. They are grouped by function to show how they connect.

Who Is Subject to Work Requirements

Work-Eligible
The default status of TANF customers. Unless a customer qualifies for an exemption, they must participate in employment-related activities as a condition of continued eligibility. Work-eligible customers may also request a hardship determination, which can relax enforcement of those requirements under specific circumstances.

Exemption
A formal excusal from employment-related activities. Customers may be exempt due to physical or mental impairment, caregiving responsibilities, domestic violence, pregnancy, or other qualifying conditions. An exemption determines *whether* work rules apply at all.

Program on Work, Employment and Responsibility (POWER)
A specialized exemption pathway for TANF customers whose disabilities or significant barriers prevent them from meeting work requirements. POWER provides a temporary exemption oriented around health-focused stabilization. Customers in POWER may, however, lose access to certain job supports, such as childcare or placement assistance.

What Is Required

Participation
A work-eligible customer's engagement in the activities specified in their Individual Responsibility Plan (IRP), provided those activities qualify as allowable work activities under District and federal TANF rules. Participation must be reported, verified, and completed for a set number of hours each week.

How Requirements Are Adjusted for Circumstances

Hardship
A condition or set of circumstances, such as health concerns, caregiving demands, family instability, housing insecurity, or transportation barriers, that limits a customer's ability to meet program requirements. A hardship determination temporarily pauses the 60-month time limit until the hardship is resolved. Hardships are distinct from exemptions.

Hardship Policy
The framework used to identify cases in which noncompliance is treated as an *inability* to fully and effectively participate in the program. By making this distinction, the policy prevents or pauses sanction-related benefit reductions while a hardship is being assessed.

Consequences of Non-Participation and Time in the Program

Sanctions
Reductions in benefits are imposed on work-eligible customers who fail to meet participation requirements. Sanctions are tied specifically to noncompliance.

Step-Downs
Reductions in benefits based on a customer's time in the program, independent of compliance. Under the 2025 Public Assistance Amendment Act, step-downs for customers who have reached the 60-month time limit will be phased in over three years.

Time Limit
The federal cap on TANF assistance is 60 lifetime months per family. States may adopt shorter limits or use non-federal funds to extend benefits beyond that threshold.

Guiding Policy Principle

Two-Generation (Two-Gen) Approach
The deliberate structuring of benefits, sanctions, and hardship policies so that adult participation requirements are enforced without fully destabilizing the children in the household. This approach recognizes caregiving realities and treats child well-being as integral to program design rather than an incidental consideration.

SUMMARY: Recommendations Based on Working Group Input

This summary presents key insights drawn from stakeholder input on implementation of the 2025 Public Assistance Amendment Act. It highlights priority considerations for DHS as it moves to implement benefit step-downs, sanctions, and hardship policies, along with related operational steps and longer-term considerations identified through the working group process.

HARDSHIP CRITERIA

Stakeholder feedback and recommendations suggested three categories of hardships.

Recognize temporary personal obstacles that can derail customers, some of which already create eligibility for exemptions. These include:

- Grief and bereavement
- Transportation challenges
- Divorce/custody/legal issues
- Housing emergencies (fire, flood, etc.)
- Housing instability/homelessness
- Second or third trimester of pregnancy
- Illness, injury, or incapacitation, specifically including physical/mental health challenges, post-partum depression, and hospitalization
- A single custodial parent or caretaker for a child under 6 years of age, lacking access to affordable or nearby childcare
- Caretaking for another household member who is ill or injured
- Domestic violence waiver

Pause the clock when administrative, technology, or program availability challenges prevent customers from meeting requirements. These challenges refer to errors and gaps on the TEP provider and DHS side, rather than on the customer side. These challenges should not transfer the burden or fault to customers.

Recognize economic and labor market conditions as nearly insurmountable obstacles. Labor market weakness can arise from macroeconomic conditions or emergencies such as disasters and public health crises.

IMMEDIATE IMPLEMENTATION

➔ 1. Coordinate and Standardize Agency Communications Before Enforcement Begins

- Launch a DHS-led, multi-channel communication campaign using plain language and repeated touchpoints
- Develop core messaging centrally and request amplification by partners such as TANF Employment and Education Program (TEP) providers, other DC agencies, and community organizations
- Ensure messaging extends beyond government channels to trusted community partners

➔ 2. Prepare and Inform Customers Before Enforcement Begins

- Issue personalized notices showing an individual's time on TANF, anticipated step-downs, and sanction risk
- Deliver information via portals, mail, email, and other accessible formats
- Provide clear, reliable contact points for questions and follow-up
- Inform customers about available TANF services, other District or federal programs, community supports, and hardship options
- Encourage use of unutilized services and supports that may ease transition

➔ 3. Stand Up a Clear Hardship Determination Infrastructure

- Finalize definitions, eligibility criteria, and decision points
- Clarify distinctions between hardship, exemptions, and POWER
- Define when hardship should trigger referral to POWER or other benefit programs
- Establish standard timelines, deadlines, and review cycles
- Implement standardized request mechanisms (online and paper)
- Design processes for initial assessment, recertification, expiration, and reassessment

➔ 4. Integrate Hardship Screening into Sanctions Decision Making

- Embed hardship screening into sanction workflows
- Require hardship assessment before sanctions and benefit reductions are imposed
- Recognize factors leading to an *inability* to fully and effectively participate.

➔ 5. Cross-System Communication and Training

- Train DHS staff, TEP providers, and relevant partners on hardship standards and workflows
- Coordinate notices, documentation practices, and handoffs across entities

➔ 6. Allowance for System Constraints and Failures

- Explicitly allow hardship determinations to pause enforcement when compliance depends on unavailable or unreliable services
- Account for provider capacity limits, misaligned referrals, and administrative delays

➔ 7. Sanction Communication and Design

- Use clear, plain-language notices explaining what triggered a sanction and how to resolve it
- Reframe sanctions as a last-resort corrective tool paired with outreach and support

➔ 8. Sanction Workload and System Improvements

- Minimize reliance on manual intervention across disconnected systems
- Enable quick removal of sanctions once compliance is met
- Consider shifting sanction initiation away from TEP providers

➔ 9. Final Review and Caseload Management

- Conduct a final hardship review for persistently non-participatory customers
- Exit customers appropriately when TANF participation is unrealistic
- Redirect capacity to customers with greater engagement potential

BEYOND IMMEDIATE IMPLEMENTATION

Longer-Term Opportunities for DHS Consideration

- **Improve coordination across programs and providers** (e.g., TANF, SNAP, WIC, other workforce services, OSSE, DDS, etc.) to support more integrated service delivery.

- **Strengthen employment and training pathways** by improving alignment between customer needs, program availability, and labor market demand.

- **Reduce administrative burden and improve navigation**, including clearer communication, streamlined processes, and more consistent customer experiences.

- **Enhance case management capacity and consistency**, including staffing models, training, and role clarity.

- **Expand data use and performance management**, including tracking customer outcomes beyond participation measures.

- **Address structural barriers to participation**, including childcare, transportation, and behavioral health supports.

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August 2026

REPORT

Introduction

Temporary Assistance for Needy Families (TANF) programs nationwide face many operational and policy challenges; Washington, DC (DC or the District) is not alone. The District's program is among the most flexible in the nation, but that flexibility has presented challenges related to engagement, outcome, and program costs that the District must navigate.

In early 2026, DC's Department of Human Services (DHS) engaged the National Academy of Public Administration (Academy) to gather stakeholder input on implementation of the 2025 Public Assistance Amendment Act (the 2025 Act). The Act requires changes to longstanding TANF policies and operations, including phased benefit reductions beyond the 60-month time limit, the use of sanctions tied to participation requirements, and the development of a hardship policy.

This report presents stakeholder-informed observations and priorities to support DHS implementation of the 2025 Act. It draws on input from listening sessions and working group discussions, along with supporting research, to examine how DHS can implement sanctions, hardship policies, and benefit step-downs, while accounting for potential risks and impacts for customers. Where perspectives differ, those differences are presented explicitly. The report is intended primarily for DHS leadership and staff, but is also written to be accessible to readers less familiar with TANF in the District.

This engagement began before the 2026-27 budget and oversight hearing processes, which started in February/March of 2026. The 2026-27 budget and oversight hearing processes have proposed additional changes to the TANF program, namely eliminating benefits for all individuals beyond 60 months with no step-downs. This document does not account for the latest proposed changes. However, many of the working group stakeholders' observations, priorities, and suggestions apply to both the original and the newly proposed scenario.

STAKEHOLDER ENGAGEMENT

The Academy team worked closely with DHS staff to design and facilitate a series of listening sessions and working group meetings to gather stakeholder feedback.

- **TANF Customer Listening Sessions (mid-February 2026):**
  More than 50 TANF customers participated in one of three listening sessions. Participants included both those with less than 60 months in the program and those at or beyond the 60-month limit. Up to four customers from each listening session were invited to join the working group activities.

- **Working Group Sessions (late February–early March 2026):**
  Three sessions convened a broad set of stakeholders, including customers, advocates, TANF Employment & Education Program (TEP) providers, DHS staff members, other District agency staff members, and Councilmembers and their staff members.

- **Additional Engagement:**
  Supplementary listening sessions and discussions were conducted with DHS, other District agency staff, advocates, Councilmembers, and TEP providers throughout the engagement period.

PURPOSE OF THIS REPORT

This report presents stakeholder-informed input to support DHS implementation of the 2025 Act, with a focus on how participation requirements, sanctions, and the hardship policy function in practice for different stakeholders. Where views differ, those differences are presented explicitly rather than reconciled.

The report begins with an overview of TANF nationally and in the District to establish baseline context, followed by an explanation of the 2025 Act and its major policy changes. It then examines each of those changes in greater detail, drawing on working group discussions, research on other jurisdictions, and analysis of potential implementation approaches and risks. The final section highlights longer-term considerations raised by stakeholders related to improving employment outcomes and supporting family stability in the District.

This report reflects stakeholder-informed priorities and observations developed through working group discussions and is intended to guide DHS implementation of the 2025 Act. The working group did not vote on priorities and observations, and nothing in this report should be interpreted as having been formally endorsed by any individual participant or stakeholder group.

Several advocacy organizations indicated that the report does not fully reflect their concerns, particularly regarding the 2025 Act itself and the harm they expect it to cause. Those issues are beyond the scope of this report, which is focused on implementation, and are best represented by those organizations directly.

Background

FEDERAL PROGRAM STRUCTURE

The 1996 Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA, P.L. 104-193)[1] created the Temporary Assistance for Needy Families (TANF) block grant, replacing the Aid to Families with Dependent Children (AFDC) entitlement program. As required by federal law, the District of Columbia restructured its cash assistance program to align with the new TANF framework.

"Participation" refers to documented engagement in required program activities under an Individual Responsibility Plan.

TANF is administered by a set of entities referred to in this report as "TANF jurisdictions," which include the 50 states, the District of Columbia, U.S. territories that operate TANF, and 76 federally recognized Tribal Nations that have elected to administer approved Tribal TANF programs pursuant to Section 412 of the Social Security Act.[2] Across these jurisdictions, TANF operates within a common federal framework but allows substantial discretion over program design, including eligibility rules, benefit levels, service models, and enforcement practices.[3]

Federal law establishes several core requirements that apply nationwide, most notably work participation requirements for work-eligible adults and a 60-month lifetime limit on federally funded cash assistance. Federal statute permits TANF jurisdictions to exempt a limited share of their caseload from the time limit under specified hardship circumstances, but it caps the size of that exemption at 20% of families[4] and does not require jurisdictions to provide assistance beyond 60 months. Within these parameters, TANF jurisdictions have adopted a wide range of approaches, leading to significant variation in how each program operates in practice.

HOW TANF WORKS IN THE DISTRICT OF COLUMBIA

TANF is the District's primary cash assistance program for families with children who have little or no other income. It is administered by the DC Department of Human Services (DHS) through the Economic Security Administration (ESA) and funded through a combination of a fixed federal TANF block grant and locally appropriated funds. Federal law sets baseline work participation requirements

[1] "H.R.3734 - 104th Congress (1995-1996): Personal Responsibility and Work Opportunity Reconciliation Act of 1996 | Congress.Gov | Library of Congress." Congress.gov. Accessed May 15, 2026. https://www.congress.gov/bill/104th-congress/house-bill/3734.
[2] Administration for Children and Families, "Tribal TANF."
[3] U.S. Congress, Congressional Research Service, *Temporary Assistance for Needy Families (TANF) Block Grant: A Primer*, R48413 (Washington, DC: CRS, 2026); and Urban Institute, *Welfare Rules Databook: State and Territory TANF Policies as of July 2023* (Washington, DC: 2025).
[4] "Temporary Assistance for Needy Families." Center on Budget and Policy Priorities, March 1, 2022. https://www.cbpp.org/research/income-security/temporary-assistance-for-needy-families.

for work-eligible adults and a 60-month lifetime limit on federally funded assistance. The District has historically used local funding to extend benefits and services beyond these federal minimums.

Administered by	DC Department of Human Services, Economic Security Administration
Funding	Federal TANF block grant (fixed) plus locally appropriated funds
Federal time limit	60 months lifetime on federally funded assistance
Framework	Two-generation (2-Gen)

Eligibility is based on household composition and income, with benefits available to families that include a child and meet financial criteria. Work-eligible adults are required to engage in program participation activities as a condition of continued eligibility. "Participation" refers to documented engagement in activities required under each customer's Individual Responsibility Plan (IRP) and recognized by DHS as countable under program rules. These activities may include employment, job search, education, training, or other approved work-related activities, and must be verified through the program. Failure to meet participation requirements can result in a sanction that reduces benefits.

DC's TANF program is structured around a two-generation (2-Gen) framework, reflecting the view that family stability depends on both adult economic participation and child well-being. In practice, the program seeks to protect children from the loss of household income even when adults face sanctions. Recently, the District has limited the use of full family benefit loss and preserved the child portion of the grant when adults lose eligibility, allocating 80 percent to children and 20 percent to adults.

PROGRAM CHANGES OVER TIME

The District has previously attempted to eliminate benefits for long-term TANF recipients. In 2011, Council enacted legislation,[5] signed by Mayor Vincent C. Gray, that gradually reduced benefits beyond 60 months. By FY16, benefits beyond 60 months were to be eliminated. As the cutoff date approached in December 2015, the Council introduced the Public Assistance Amendment Act of 2015, proposing hardship extensions and expanding eligibility beyond 60 months. Although the 2015 Act was never passed, it signaled openness to a shift in policy direction.

In 2016, DHS and policy makers convened a formal working group to develop a hardship extension policy and to recommend how DC could continue assistance for some families and avoid destabilizing outcomes. The final report examined the impact of time limits on families

The 2016 Working Group considered:

1. *Which families should continue to receive TANF assistance past 60 months?*
2. *What amount of assistance should be provided and for how long?*
3. *What conditions and requirements should be in place to continue receiving assistance beyond 60 months?*

5 D.C. Law 18-366. TANF Educational Opportunities and Accountability Amendment Act of 2010

and children, including the risks associated with involuntary exits from TANF without stable employment or supports. It helped shift the policy conversation toward preserving support for children.

In the meantime, although benefits after 60 months were supposed to end by FY16, Mayor Muriel Bowser and the Council funded these benefits in the FY16 and FY17 budgets,[6] effectively delaying full implementation of the termination contemplated under the 2011 policy.

The working group report laid the groundwork for the 2018 reforms, during which the District adopted a new policy framework. Families were no longer fully cut off at 60 months, and the 2-Gen framework (described above) was introduced.

A GLIMPSE AT DC'S TANF PROGRAM

Participant Characteristics

As shown in Table 1, in nearly 10 years since the first TANF working group, household enrollment and the number of individuals covered have grown by 9 percent and 13 percent, respectively. Average payments have more than doubled, and program costs have grown by approximately 150 percent. Notably, the number of families receiving benefits for more than 60 months has grown 39 percent over that period. In 2016, families on TANF for over 60 months accounted for only around 40 percent of the total TANF population; now, customers over 60 months make up slightly over half of the TANF population (7,914/15,610 as of December 2025).

Table 1. Changes in the District's TANF Program, 2016-2025

	TANF Characteristics		
	FY16-17	FY24-25	
Households	13,833	15,043	+9%
Individuals	43,213	48,847	+13%
Average Payment	$308.72	$706.99	+129%
Annual Program Cost	$51.3 million	$130.1 million	+153%
Households > 60 Months	~5,700 (July '16)	7,914 (Dec '25)	+39%

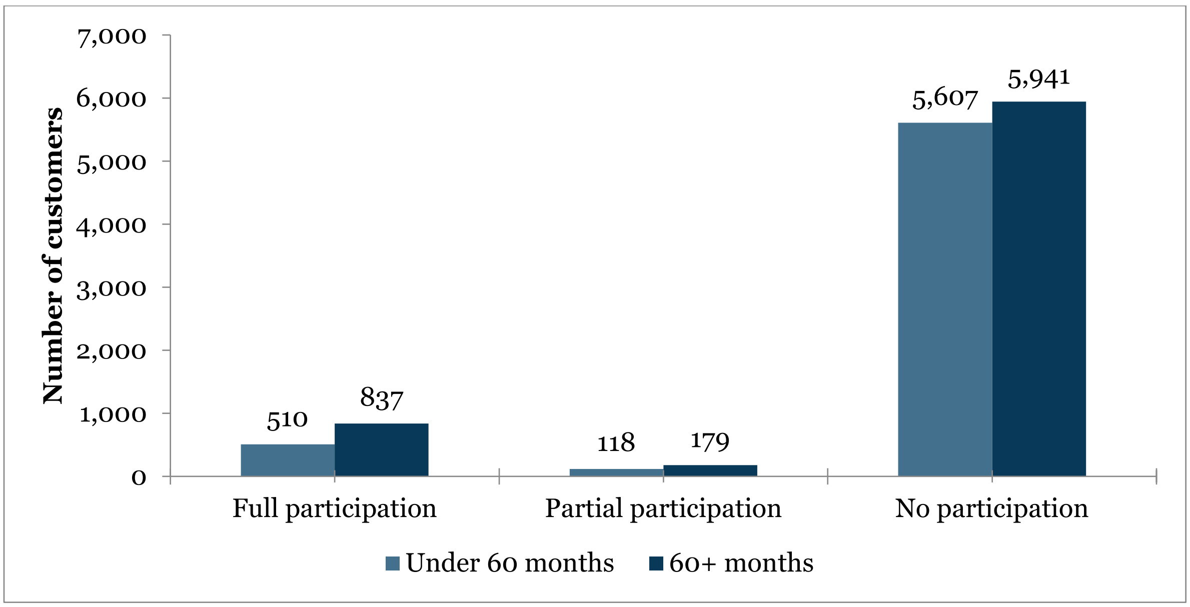
Source: DC DHS data

[6] "Recommendations for Development of a TANF Hardship Extension Policy for Washington, DC." Barbara Poppe and Associates, October 18, 2016. https://dhs.dc.gov/sites/default/files/dc/sites/dhs/publication/attachments/TANF%20Hardship%20Report.pdf

Work Eligibility and Participation Levels

Today, 85 percent of TANF households (or assistance units) include at least one work-eligible adult. However, as shown in Figure 1 below, participation in required work activities is relatively low. Slightly more than 10 percent of work-eligible customers fully met participation requirements in February 2026, and 2 percent partially met requirements.[7] What's more, of the 11,548 customers who did not fully meet participation requirements in February 2026, 51 percent had been in the program for more than 60 months.

Figure 1. Work-Eligible TANF Customers by Participation Level and Time on Assistance, District of Columbia, February 2026



Source: District of Columbia Department of Human Services administrative data for February 2026.

Note: N = 13,192 work-eligible customers. Bars show counts; percentages cited in text are computed as shares of the total work-eligible population.

[7] According to DHS, "partial participation" refers to customers who submitted fewer approved hours than required. The number of hours required varies with household composition and circumstances.

The Public Assistance Amendment Act of 2025

The 2025 Public Assistance Amendment Act was signed into law as part of the 2025 budget process. The Act implemented several key changes to the TANF program, discussed below. It reflects a shift in how the District approaches TANF. According to the Committee on Human Services FY26 Budget Report and Recommendations,[8] it is a response to rising local TANF costs and the need to mitigate long-term budget exposure while continuing to support families facing economic hardship.

The law attempts to manage fiscal risk through three interrelated mechanisms:

- **Limit full benefits to 60 months,** with phased reductions for customers beyond 60 months, to limit the District's ongoing financial outlays.
- **Consistently impose sanctions** for non-compliance with participation requirements.
- **Develop a hardship proposal** to mitigate unintended impacts on vulnerable families.

The 2026 DC DHS TANF Working Group, composed of Councilmembers, customers, advocates, DC DHS staff members, TEP providers, and other DC agency staff members, met three times in February and March to discuss the TANF program. Specifically, they were asked about the status of the TANF program, upcoming reductions in benefits for TANF recipients beyond 60 months, sanctions for those not fully participating in the program, hardships, and their longer-term ideas and visions for the TANF program. The sections below describe these policy changes and present the Working Group's input.

BENEFIT REDUCTIONS AFTER 60 MONTHS

The District's TANF program currently provides full benefits, with no time limit, to all customers who comply with participation requirements. While federal TANF funds can be used to support some families who remain on assistance beyond 60 months, federal rules limit the share of the caseload that may receive federally supported assistance beyond the time limit. As a result, the District relies in part on local funds to sustain extended participation.

Starting on October 1, 2026, the District will begin to "step down" benefits for customers beyond the 60-month limit over the next three fiscal years. For example, a customer over 60 months receiving the 2026 average monthly payment ($706.99) will experience the following phased reductions:

FY26-27	benefits reduced by 30% to	$494.89
FY27-28	benefits reduced by 50% to	$353.50
FY28-29 (and thereafter)	benefits reduced by 75% to	$176.75

[8] "Committee on Human Services FY 26 Budget Report and Recommendations." Accessed May 15, 2026. https://mattfruminward3.com/committee-on-human-services-fy-26-budget-report-and-recommendations/

Stepping down benefits would reduce the District's direct local spending on supporting customers beyond the 60-month limit.

Other Jurisdictions' Time Limit Policies

Programs generally impose time limits in one of two ways. The first is a lifetime limit, after which benefits are permanently terminated. The second is an intermittent or step-based limit, in which benefits are reduced or interrupted over time but not necessarily eliminated entirely. Jurisdictions with time limits often pair them with exemptions or extensions, allowing certain families to continue receiving assistance beyond the limit or shifting those cases to state-funded benefits. Forty jurisdictions have implemented a 60-month time limit; 11 have a time limit of less than 60 months, and 2 do not have a time limit. See Table 2 for selected examples.

For the District, this distinction is critical. Unlike most jurisdictions that enforce lifetime limits resulting in permanent exits, DC has historically relied on locally funded assistance to extend benefits beyond the federal 60-month limit. The 2025 Act represents a shift away from that approach: rather than immediate termination, it introduces phased benefit reductions while still allowing for hardship extensions. As a result, DC's policy now sits between models, moving toward a more structured time-limit system while retaining mechanisms to avoid abrupt, permanent loss of assistance for families with significant barriers.

Stakeholder Perspectives: Benefit Reductions

The planned benefit step-downs will reduce assistance for many customers without a corresponding increase in realistic employment opportunities. While the policy is intended to encourage participation, work, and self-sufficiency, stakeholders noted that many customers face barriers that limit their ability to increase earnings in the near term. The proposed step-downs do not directly address any of the various challenges customers must navigate to engage with employment, education, skills-building, and training opportunities.

The relatively short timeframe before program changes take effect presents significant implementation challenges. The step-downs were scheduled to begin less than six months after the finalization of this report (June 2026). Even if DHS had taken immediate steps during last summer's budget process, they would have had approximately 15 months to prepare an entire program ecosystem, including roughly 15,000 families, for a completely new dynamic. The working group's feedback was that DHS's communication to TANF customers about these changes has been insufficient, inconsistent, and confusing. Different agencies, service providers, and subsets of DHS have sometimes conveyed conflicting information to customers and TEP Providers. The stakeholders indicated that an explanation of the changes in clear, plain language, with personalized information, should already have occurred and must occur as quickly as possible, given the direct effects of benefit reductions may have on family stability.

Table 2. Select Programs Time-Limit Policies

State	Time-Limit Policy
D.C.	No time limit
Delaware	36-month cut-off for time-limited assistance and offers non-time-limited assistance
Massachusetts	No time limit[a] and benefit transitional period[b]
Nebraska	60-month cut-off for time-limited assistance, and offers non-time-limited assistance, but includes a benefit transitional period[c]
New Hampshire	60-month cut-off for New Hampshire Employment Program recipients and no time limit for Family Assistance Program recipients
South Carolina	60-month cut-off for all except Challenging Adults through Rehabilitation, Education, and Services recipients, who do not have a time limit
Wisconsin	48-month lifetime total cut-off (60-month federal limit also applies); 24-month cumulative limit per component (Trial Employment Match Program, Community Service Job), and W-2 Transition; benefit transitional period[d]
Notes:	a. Currently, DC and Massachusetts are the only two jurisdictions without a lifetime limit on TANF. Massachusetts limits non-exempt recipients to 24 months of benefits within any 60-month period, requiring a waiting period before they can receive benefits again. DC families can receive unlimited, continuous service with no periodic interruptions. b. In Massachusetts, eligible families can receive an additional three months of cash assistance. Child care, Medicaid, and SNAP are not subject to the TANF time limit. c. Nebraska embeds transition within program participation through the Employment First model, which combines cash assistance with work requirements, job preparation, and employment services designed to move participants toward self-sufficiency. Families receiving TANF in Nebraska may also receive Medicaid, SNAP, and child care assistance, creating a package of supports that extends beyond cash assistance and supports the transition to employment. d. Wisconsin allows individuals nearing the time limit to remain in the program to access employment services. Eligible families can receive an extension, but the length is determined through rule and case criteria.

Source: Welfare Rules Database, Urban Institute, accessed May 15, 2026, https://wrd.urban.org/.

Past patterns of communication and follow-through have shaped customer expectations. A history of inconsistent messaging and limited follow-through by TEP providers, DHS, and other District agencies has contributed to general customer skepticism about whether the announced changes will be implemented. As a result, some customers reportedly do not believe that step-downs and/or sanctions will occur, given prior experiences and previous inaction. This may result in customers ignoring communications or failing to plan for changes in benefits, thereby affecting their ability to prepare for or respond to them in a timely manner.

TANF cash assistance generally counts as income for other means-tested programs, though its impact varies by program. For example, SNAP and housing assistance are each likely to partially offset lost TANF cash by 30 percent. Medicaid eligibility is unlikely to be affected for most households, though administrative churn may increase. Even with these offsets, families are likely to experience a net monthly income loss that grows as step-downs increase.

Reduced TANF benefits are likely to shift demand toward other benefit programs and supports. Customers whose benefits are reduced may seek support from other District programs, community-based organizations, or informal networks to replace assistance no longer available through TANF. These services and supports may not have the capacity to accommodate increased demand and could experience additional administrative challenges. These shifts could also have ripple effects across the broader safety-net system, including impacts on Supplemental Nutrition Assistance Program (SNAP) and housing assistance.[9] [10]

Some stakeholders suggested that over time, the demand for TANF may decline as expectations about the program become clearer. They suggested that clearly signaling that TANF is not intended to provide indefinite assistance may encourage some customers to reevaluate their options and plan accordingly, seeking different support opportunities that better align with their needs and circumstances. This view was not shared by all stakeholders.

These concerns are compounded by concurrent changes affecting other benefit programs. Stakeholders noted that adjustments to childcare availability, SNAP, and other supports are occurring alongside the TANF benefit reductions.[11] [12] The combined effect of these changes may increase stress on families and further strain an already diminishing safety net, particularly for households with limited capacity to absorb multiple simultaneous reductions or disruptions in support.

[9] SNAP benefits are calculated as = maximum benefit - 30% of net household income. See DC DHS SNAP Guidance at https://dhs.dc.gov/service/snap-eligibility-requirements.

[10] HUD's core rule for Public Housing and Housing Choice Vouchers is Tenant Rent = 30% of adjusted monthly income. See DC Housing Authority (DCHA) rent calculation guidance at https://www.dchousing.org/wordpress/vouchers/rents-2/.

[11] DC Child Care Subsidy Program Waitlist. Accessed May 15, 2026. https://osse.dc.gov/subsidywaitlist

[12] SNAP Work Requirements. Accessed May 15, 2026. https://dhs.dc.gov/page/snap-work-requirements

Recent federal policy changes are shifting SNAP and Medicaid toward stricter eligibility and stronger work expectations while reducing federal spending. SNAP now has expanded work requirements (covering more adults and limiting exemptions) alongside new cost-sharing and funding changes for states. Medicaid is introducing nationwide work or "community engagement" requirements, more frequent eligibility redeterminations, and funding constraints that may reduce coverage.

Recommendations on Steps DHS Can Take Immediately to Manage the Transition and Ease the Impact on Customers, Based on Working Group Input

Initiate a broad-based, multi-channel communication campaign to alert customers to upcoming changes. These communications must be simple, consistent, and broadly distributed. DHS should develop primary communications and messaging and make specific requests of partners to share and amplify them. The communications and messaging should go beyond TEP Providers and other DC government agencies; they must also include community organizations and resources.

Provide personalized updates. Each customer should also receive individualized communications on their time limits, the impact on their payments, and alternative sources of assistance. This information should be provided through customer portals, written communications, and by any other means possible. The updates should be clear and understandable, and they should provide reliable contact information for questions and support.

Let customers know what they can do now to prepare. Customers may not currently utilize all services available to them. As part of the messaging campaign, DHS should highlight other federal or DC support services that can help with the transition or provide longer-term support. Community organizations and resources may also provide different types of support. Customers should also be made aware that they may be able to pursue a hardship determination, as discussed in a later section.

SANCTIONS

Sanctions are temporary reductions of TANF cash benefits when a customer does not meet work participation requirements or Individual Responsibility Plan (IRP) obligations, engage with TEP providers, or meet other program requirements. Federal law gives TANF jurisdictions discretion over whether and how to impose sanctions. The premise is that a penalty or the threat of a cash penalty is enough to motivate compliance.

The 2025 Act increases the statutory penalty for failure to meet TANF work requirements from 6 percent to 25 percent of the household's benefit. An assistance unit is a group of people whose income, eligibility, and TANF benefits are assessed and paid together as one case. It typically consists of a parent or caregiver and children in their household. The higher sanction rate will take effect beginning October 1, 2026.

Other Jurisdictions' Sanctions Policies and Research Evidence

As other jurisdictions have different time limits, hardship definitions, and procedures, they also differ in what merits a sanction and the severity of that sanction. For instance, only some use sanction structures like the District's, where penalties reduce the family's grant without fully terminating benefits, often by removing or reducing the adult portion while children continue to receive assistance. The District is one of nine jurisdictions (along with California, Connecticut, Illinois, Maine, Maryland, New York, Oregon, and Vermont) where the most severe sanction is only partial loss of benefits. Thirty-one jurisdictions use case closure as the most severe sanction (a family must reapply for benefits), and in 14, families lose benefits altogether.

Research consistently finds that TANF participants who fail to meet work participation requirements typically face substantial barriers to employment, not a lack of motivation. These barriers include health limitations, caregiving responsibilities, limited education or work experience, and challenges such as transportation and access to childcare.[13] Many recipients work in jobs that are unstable or structured in ways that do not align with TANF's required hours of participation, making it difficult to consistently meet hourly thresholds.[14] In addition, program design and administrative requirements, such as strict definitions of qualifying activities and reporting burdens, contribute to noncompliance.[15]

Stakeholder Perspectives: Sanctions

Some Working Group participants believe customers who fail to meet participation requirements should face consequences. Aside from representatives of advocacy organizations, stakeholders (including customers) generally agreed that individuals who are not participating in required program activities and who are not experiencing a hardship should not continue to receive full TANF benefits. This shared baseline reflects acceptance of conditionality as a feature of the program and provides a starting point for subsequent discussions about how sanctions should be structured and applied.

The current non-participation rate of 88 percent among all work-eligible customers demonstrates significant program design and policy problems that the DC Public Assistance Amendment Act of 2025 is unlikely to fully address. Stakeholders consistently interpreted this level of non-participation as reflecting structural barriers, such as administrative burden, service capacity limitations, and misalignment between requirements and client circumstances, rather than individual noncompliance alone. From this perspective, changes to sanctions may mitigate consequences for a subset of participants but are unlikely to materially shift engagement patterns without corresponding reforms to program access, work activity alignment, and case management supports.

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[13] Dan Bloom, Pamela J. Loprest, and Sheila R. Zedlewski, *TANF Recipients with Barriers to Employment* (Washington, DC: U.S. Department of Health and Human Services, Office of Planning, Research, and Evaluation, 2011).
[14] Urban Institute, "TANF Isn't Improving Participants' Employment Outcomes. Could Sectoral Work Programs Be the Answer?" August 1, 2022.
[15] Congressional Budget Office, *Work Requirements and Work Supports for Recipients of Means-Tested Benefits* (Washington, DC: CBO, 2022).

Views varied on how the sanctions process should function. These differences are centered on what should qualify as sanctionable noncompliance, how quickly sanctions should be imposed, and how much discretion should be exercised in individual cases. These discussions came back to questions about how hardship is identified and documented. Stakeholders emphasized a need for individual assessment and treatment, rather than formulaic, cookie-cutter methods.

Sanctions can worsen instability when noncompliance is driven by new or acute obstacles, leading to increased stress, anxiety, and cognitive load. Customers may then struggle to navigate barriers, stay organized, or engage constructively with providers, all of which can make it harder to progress toward employment. In some cases, a hardship determination may be a more appropriate response than a sanction.

Communication gaps and information lags between DHS, TEP providers, and customers contribute to delays in both placing and removing sanctions. Documentation challenges and system errors can also unintentionally trigger sanctions, undermining trust and increasing hardship even when customers are attempting to comply. Stakeholders questioned whether current sanctioning approaches support engagement and employment goals when noncompliance stems from administrative barriers or factors beyond customers' control.

Recommendations to Improve the Effectiveness of Sanctions, Based on Working Group Input

Sanctions must be communicated clearly, promptly, and in plain language. Customers need to understand when and why a sanction is being applied, what specific action(s) triggered it, and exactly what steps are required to end it. Also, the term "sanction" itself is vague and alarming and can obscure rather than clarify expectations. Using clearer, plain-language explanations could ease confusion, anxiety, and delays in reengagement, even if statutory or system language continues to rely on the term.

Sanctions should be used sparingly and strategically, rather than as a primary driver of behavior change. To function as a true last resort, sanctions must be paired with proactive outreach and supportive case management that help customers regain compliance in the short and long term. This will require deliberately redesigning workflows, timelines, and performance expectations so that engagement and problem-solving are the default responses to noncompliance, rather than enforcement.

The responsibility for sanction initiation should be shifted away from TEP providers. This step would allow TEP staff members to focus on engagement and support rather than enforcement. Current sanction processes significantly increase case managers' workloads. They limit the time available for coaching, barrier resolution, and follow-up with both compliant and non-compliant customers. High caseloads and staff turnover further complicate information-gathering and follow-through, increasing the risk that sanctions are applied or prolonged due to missing or outdated information rather than intentional nonparticipation.

Sanction processes should be designed to minimize delays, allow sanctions to be lifted quickly once compliance is met, and reduce reliance on manual intervention across disconnected systems. Technology and data-system limitations were repeatedly cited as obstacles to fair and effective sanctioning. Lost paperwork, unclear case status, slow approvals, system errors, and fragmented data across DHS, TEP providers, and other District entities can discourage customers and lead to premature or prolonged sanctions, even when customers have taken required steps. Stakeholders recognized that system improvements require investment but are central to improving outcomes.

Working group participants had differing views on how to respond when customers remain non-participatory after outreach and hardship consideration. Some stakeholders expressed that they should undergo a final hardship review and, if appropriate, be exited from the program. They noted that nonparticipating customers inflate caseloads while still requiring ongoing paperwork and outreach, without improving outcomes. This limits DHS's and providers' ability to focus resources more effectively. Other stakeholders saw this strategy as excessively punitive.

HARDSHIPS

Federal law requires TANF programs to offer flexibility in cases of hardship, when stopping the TANF clock may be appropriate. However, it does not specify eligibility criteria, duration, or documentation requirements. The 2025 Act did not explicitly modify or call for an updated hardship policy. However, in discussions with the Committee on Human Services in summer 2025, DHS acknowledged that responsibly implementing the step-downs and sanctions would require revisiting and potentially revising the existing hardship policy to mitigate negative impacts on families by ensuring that those facing additional challenges receive appropriate support.

A hardship policy focuses on noncompliance as an *inability* to fully and effectively participate in the program. Once a customer has completed a hardship assessment and received a hardship determination, it prevents or pauses sanction-related benefit reductions. Specifically, a hardship policy:

- Establishes a pathway for eligible customers with long-term barriers to continue to receive full benefits beyond the 60-month time limit; and
- Allows the District to temporarily pause the 60-month clock for customers experiencing qualifying short-term hardships.

Hardship Extensions, Exemptions, and POWER

The District's TANF program recognizes that a customer may sometimes be unable to meet work requirements. As such, that customer may have options for continuing to receive their benefits, depending on the circumstances. The three primary ways that TANF customers can continue to receive cash benefits are the following:

- **Exemptions** have broad eligibility criteria: they remove the work requirement but do not stop the 60-month clock.
- **The Program on Work, Employment, and Responsibility (POWER)** provides customers with certain health or caregiving needs with a temporary exemption and also stops the clock. Because POWER is designed to support health-focused stabilization, customers may lose access to job supports such as childcare or placement assistance.
- **A hardship extension**, by contrast, allows work-eligible customers to avoid sanctions while also stopping the clock for situations that prevent them from fully participating. Current law and publicly available program materials do not define a standardized set of hardship criteria or an operational framework for determining eligibility.

Other Jurisdictions' Hardship Policies

Federal law requires TANF programs to offer flexibility in case of hardship, but it does not specify eligibility criteria, duration, or documentation requirements. Some common definitions for hardship circumstances are personal or dependent's illness or incapacitation, pregnancy, age, and domestic violence.

Some jurisdictions effectively "stop the federal time limit clock" through funding and program design, rather than hardship determinations. Under federal rules, only months financed with federal TANF funds count toward the 60 month limit. States can therefore prevent time from accruing by shifting cases to state-only funding streams or separate state programs, or by structuring cases to fall within federally excluded categories.

Table 3 presents the eligibility criteria for all exemptions and POWER, with some language simplification for comparison. Customers who do not pursue any of these options are subject to sanctions if they are non-compliant; see the previous section.

Hardship operates on a separate track. Federal guidance generally does not permit states to pause the clock based on hardship. Instead, states use mechanisms such as state-only funding to prevent months from counting. As a result, most states distinguish between time-limit accounting and hardship: the former determines whether months accrue toward the federal limit, while the latter determines whether assistance continues after the limit is reached. In practice, hardship is implemented through extensions or non-federal assistance, rather than by suspending the clock.

Table 3. District's Current Eligibility Criteria for an Exemption or Referral to POWER

Eligibility Criteria	Exemption:	POWER:
Health Conditions, Including Pregnancy		
A woman who is in the second or third trimester of pregnancy	Y	
Being a pregnant or parenting teen under the age of 19 who meets certain conditions, such as attending school		Y
A person who is ill, injured, or incapacitated. Must be proven by competent medical evidence; POWER specifies when more than 30 days.	Y	Y
Caretaking, Including Childcare Issues		
A parent with a child under 12 months	Y	
A teen parent who can provide proof of school attendance or who can show that there is a lack of childcare for a child under age 6 that prevents the teen from attending school	Y	
A single custodial parent or caretaker who personally provides care for a child under 6 who cannot get affordable or reasonably distanced childcare	Y	
A parent/caretaker in a two-parent household who is not a PWE (Primary Wage Earner) and is taking care of a child under 6, if they cannot get affordable or reasonably distanced childcare	Y	
A person who is at home because another household member is ill or injured; POWER specifies physically or mentally incapacitated	Y	Y
Adjusted Work Requirements		
Persons in a two-parent household are working for a combined average of at least 35 hours per week or 55 hours per week if receiving federally funded childcare	Y	
A single parent/caretaker is working an average of 30 hours per week	Y	
Special circumstances		
A minor who is not the head of an assistance unit or is not a parent of a child receiving TANF,	Y	
A full-time VISTA or AmeriCorps volunteer	Y	
A recipient 60 years or older	Y	Y
A person granted a domestic violence waiver	Y	Y

Source: D.C. Department of Human Services.

The following examples illustrate state approaches to hardships:

- **Texas** uses hardship as a post-limit extension mechanism, primarily related to disability, caregiving, and family violence. Customers must remain compliant with program work requirements. It also recognizes economic hardship, including living in a high-unemployment area or a documented unsuccessful job search.[16]
- **Washington** does not count certain months toward the time limit based on status, rather than individualized review. Criteria include child-only cases, ineligible parents, family violence, and certain caretaker arrangements, among others.[17]
- **Florida** links hardship to inability to meet work requirements despite effort, with a strong emphasis on labor market barriers and compliance history.[18]
- **Georgia** frames hardship as a barrier to self-sufficiency. Qualifying hardship includes domestic violence or safety concerns, active child protective services (cps) involvement, substance abuse treatment, physical or mental incapacity, and caring for a disabled household member.[19]
- **Illinois'** "good cause" exemption model offers hardship-related exemptions tied to past, current, or potential future family violence and the need to focus on restoring safety.[20]

Working group discussions did not differentiate between exemptions and hardships. A hardship stops the clock and relaxes penalties (sanctions) for work-eligible customers who are unable to meet participation requirements due to specific circumstances. An exemption removes the work requirement altogether, but the clock keeps ticking.

Table 4 displays some of the most common time limit-related exemption and extension criteria, according to the Urban Institute's Welfare Rules Database (WRD).

[16] Texas Health and Human Services Commission, *"A-1930, Extended TANF and Hardship Exemptions,"* Texas Works Handbook, last modified October 1, 2006, https://www.hhs.texas.gov/handbooks/texas-works-handbook/a-1930-extended-tanf-hardship-exemptions.
[17] Washington State Legislature, *"WAC 388-484-0005: There Is a Five-Year (60-Month) Time Limit for TANF, SFA, and GA-S Cash Assistance,"* Washington Administrative Code, https://app.leg.wa.gov/wac/default.aspx?cite=388-484-0005.
[18] Florida Department of Children and Families, *"65A-4.201: Criteria for Hardship Extensions and Exemptions to Cash Assistance Time Limit,"* Florida Administrative Code, effective March 13, 2024, http://flrules.elaws.us/fac/65a-4.201/.
[19] Georgia Department of Human Services, Div of Family and Children Services, *"1392 Hardship Waiver,"* TANF Policy Manual (PAMMS), effective October 2024, https://pamms.dhs.ga.gov/dfcs/tanf/1392/
[20] Illinois Department of Human Services, *"TANF 60-Month Time Limit Exception Request Desk Aid,"* Cash, SNAP, and Medical Policy Manual, https://www.dhs.state.il.us/page.aspx?item=78404.

Table 4. Time Limit Exemption and Extension Policies Across State and Territory TANF Programs

Time Limit Exemption and Extension Policies	Exemptions (# Jurisdictions)	Extensions (# Jurisdictions)
Health Conditions, Including Pregnancy		
Pregnancy beyond a certain month/stage	4	5
Ill, incapacitated, or has a disability	20	41
Substance abuse and/or mental health treatment		14
Caretaking, Including Childcare Issues		
Caring for a child under a certain age	12	9
Caring for a person who is ill, incapacitated, or has a disability	20	40
Minor parent	19	-
Adjusted Work Requirements		
Working minimum hours or having earned minimum income	2	13
Actively sanctioned or in noncompliance	10	-
Education, vocation, or other training programs	-	13
Not job-ready or other employment barriers	-	11
Special Circumstances		
Cooperating but unable to find employment	2	21
Victim of domestic violence	18	42
Unemployed due to high local unemployment	-	14
Being a certain age or older	17	10
Not Receiving Support Services	5	13
Receiving a low benefit amount	7	-
Housing instability or homelessness	-	5

Source: The Urban Institute's Welfare Rules Database.

Stakeholder Perspectives: Hardships

A hardship is more than a relaxation or suspension of requirements; it is a potential point of intervention. Stakeholders emphasized the importance of reassessment and ongoing communication to understand how hardships evolve over time and affect participation.

Hardships present differently across customers. Stakeholders stressed the importance of recognizing hardship as a context-specific condition rather than a uniform category, further emphasizing the need for less cookie-cutter models. Circumstances that significantly interfere with one family's ability to comply with program requirements may not have the same effect on another family. Any single circumstance can exacerbate or be exacerbated by other factors in the customer's life, and not always in predictable ways.

Categories can capture some of the important variation. The duration of impact can be hard to predict, especially for situations that require substantial and/or complex problem-solving. Nonetheless, these categories may help guide individual determinations.

> Short-term or temporary hardships often arise unexpectedly and are associated with acute instability rather than ongoing structural barriers. The working group emphasized that, in these circumstances, customers are typically able to participate under normal conditions but are temporarily unable to engage due to an external shock.
>
> Long-term or recurring hardships interfere with participation over an extended period, even with other supports. These situations may require longer-term accommodation and ongoing engagement. These conditions are typically identifiable, documentable, and associated with predictable limits on a customer's ability to participate in required activities.
>
> Permanent or very long-term hardships make participation in the TANF program inappropriate or unrealistic. Stakeholders noted that these situations are often better addressed through other District or federal support systems rather than continued TANF participation. In these cases, stakeholders emphasized that DHS should focus on identifying affected customers early and helping connect them to services better aligned with their long-term needs.

Individualized assessments could improve the accuracy and fairness of hardship determinations but are challenging to implement at scale. They would require significant staff time and coordination in a system already managing high caseloads and fragmented processes, creating a tradeoff between precision and administrative capacity. At the same time, more detailed assessment requirements may increase the burden on customers facing significant hardship, potentially contributing to disengagement or unintentional non-compliance.

Hardships are sometimes identified too late, after sanctions (including benefit reductions) have already been initiated. In these cases, relief is sought only once adverse actions are underway, limiting the ability of hardship determinations to prevent avoidable harm or stabilize families before benefits are reduced. Delays can occur when a customer does not reach out in a timely manner, when administrative processes fail, or when a potential hardship-warranting circumstance is not sufficiently identified or investigated.

The hardship determination process is unclear and difficult to navigate. Stakeholders reported that the lack of clarity around eligibility criteria, documentation requirements, and decision timelines increases vulnerability for customers who are already experiencing instability. Uncertainty about how and when hardship determinations are made can add stress during periods of acute need. Stakeholders also noted that the administrative burden associated with hardship determinations is significant for both customers and DHS.

Communication, coordination, and documentation complicate the determination process. Tracking ongoing hardship reviews and their status across DHS staff, providers, and systems was described as administratively burdensome. These challenges can contribute to delays, inconsistent application, and difficulty ensuring that hardship determinations are accurately reflected and promptly incorporated into benefit and sanction decisions.

The hardship policy should account for system-level constraints and administrative breakdowns. Even though these conditions are not, per se, hardships, they lead to the customers' inability to meet requirements. Unreliable information systems and insufficient staff capacity can lead to errors and delays in case data. Customers' limited visibility into administrative systems prevents them from identifying and correcting issues before sanctions take effect. Stakeholders recommended that hardship determinations explicitly allow DHS to pause or waive enforcement when compliance depends on services the system itself cannot reliably deliver, including situations where:

- Assigned activities or compliance options are unavailable, oversubscribed, or canceled
- TEP providers are unable to serve customers within the required timeframes
- Referrals do not align with customer circumstances, such as caregiving responsibilities, health limitations, or scheduling constraints

Recommendations for Hardship Criteria, Based on Working Group Input

The working group identified three broad categories of hardship: personal circumstances, program capacity limits, and labor market conditions. Several proposed hardship criteria are similar to existing exemption criteria. Definitions should either align fully or clearly distinguish when a customer is eligible for one and not the other.

Personal Circumstances

• Grief and bereavement • Transportation challenges • Divorce/custody/legal issues • Housing emergencies (fire, flood, etc.) • Housing instability/homelessness	*New criteria*
• Second or third trimester of pregnancy • Illness, injury, or incapacitation, specifically including physical/mental health challenges, post-partum depression, and hospitalization • A single custodial parent or caretaker for a child under 6 years of age, lacking access to affordable or nearby childcare • Caretaking for another household member who is ill or injured • Domestic violence waiver	*Similar to some of the current exemption criteria*

Program Capacity Limits

Stakeholders recommended that the clock stop when administrative, technological, or programmatic challenges prevent customers from meeting requirements. Examples of system-related barriers identified in working group sessions include administrative errors (e.g., lost paperwork, incorrect case records, or delayed approvals), technology failures (e.g., system glitches, delayed data updates, or disconnected systems across DHS and providers), and program availability constraints (e.g., TEP providers unable to serve customers, required activities unavailable or oversubscribed, or referrals misaligned with customer circumstances). Stakeholders also emphasized communication failures, including notices that were not received or understood, and inconsistent or delayed communication of requirements.

In these situations, customers may be unable to comply despite making good-faith efforts, supporting the need to pause compliance timelines when barriers are attributable to the system rather than the individual. In these cases, progression toward sanctions or time limits does not reflect noncompliance, but rather a breakdown in program delivery. This category also reflects broader concerns about implementation capacity, including fragmented systems, staffing constraints, and coordination challenges across agencies and providers. Stakeholders noted that these issues are not isolated incidents but recurring features of program operations that directly affect customers' ability to meet requirements.

Labor Market Conditions

The working group recommended that economic and labor market conditions be recognized as nearly insurmountable obstacles. TANF policy assumes a baseline level of job availability, such that compliance with program requirements can reasonably lead to employment or increased earnings. However, this assumption does not hold uniformly over time or across sectors. Periods of economic downturn, localized job scarcity, or weak alignment between available jobs and customer skills can significantly constrain employment prospects, regardless of individual effort or compliance.

In these conditions, customers may meet program expectations, such as participating in assigned activities or actively seeking work, without achieving employment outcomes. Stakeholders emphasized that, in these cases, continued progression toward time limits may not reflect disengagement or lack of effort, but rather the limits of the local economy to absorb workers.

This category also includes periods of public health emergencies or declared disasters when widespread conditions limit the availability of work or participation opportunities. For example, during the COVID-19 pandemic, the District and other jurisdictions across the United States faced widespread disruptions to employment, childcare, and program operations, limiting both the availability of work and customers' ability to meet participation requirements.

Recommendations for Hardship Policy Implementation Based on Working Group Input

A hardship policy can only mitigate adverse impacts if it is implemented through a clear, timely, and well-coordinated process. Stakeholders emphasized that the design of the hardship determination process is as important as the definition of hardship itself. Attention must be given to how decisions are initiated, communicated, documented, and reviewed. Administrative burden, communication, timing, and system capacity are also critical concerns.

Establish a clear hardship determination process in advance of the implementation date of the 2025 Act (October 1, 2026). Core elements of an effective process include:

- Formalized definitions and decision points, so customers and staff understand when and how hardship determinations are made, how they differ from exemptions, and when a hardship should lead a customer to the POWER program or other service program
- Established timelines and deadlines, including for initial determinations, reviews, and extensions
- Standardized information request mechanisms, including both online and hard-copy forms
- Defined processes and documentation requirements for initial assessment, recertification, expiration, and reassessment that balance accountability with the increased paperwork burden placed on customers who are already navigating a difficult situation.
- Capacity to address simultaneous hardships, including multiple hardships affecting a single customer.
- Capacity to conduct individual (labor-intensive) assessments and re-assessments, in recognition that hardships are highly individualized.

Design a process that is easy to navigate. The process should not further burden customers already experiencing instability. Rather, it should minimize unnecessary documentation or delays.

Establish clear and coordinated communication channels to support effective implementation. Hardship-related communications must be predictable, consistent, and accessible across DHS, TEP providers, and other District entities. It is essential that:

- Notices arrive on time and are easily understood
- Required actions, documentation, and deadlines are clearly communicated
- Changes in requirements or expectations are communicated proactively, not after enforcement actions occur
- Staff and partners involved in processing hardship requests receive training and orientation to ensure consistent application

Structure hardship determination as a preventive mechanism, ensuring it occurs before any penalties are imposed. Hardship screenings should be integrated into sanction decision making. Screening should occur before sanctions are applied, with clear documentation, timelines, and decision points that allow DHS to treat noncompliance as an *inability* to fully and effectively participate in the program. Incorporating more detailed information about a customer's circumstances could reduce inappropriate sanctions and reinforce sanctions as a corrective tool rather than a blunt enforcement mechanism.

LONG-TERM EFFORTS

The working group identified many initiatives the District can take once the transition to the 2025 Act requirements is complete. Sustainable employment and lasting exits from the TANF program remain the most effective ways to shield customers from the impacts of planned benefit reductions and increased sanctions, and to promote stability. The working group consistently emphasized that the TANF program's current design has long struggled to support transitions to sustainable employment, and that the 2025 Act does not fundamentally alter those underlying conditions. These challenges predate the 2025 Act and reflect broader structural, labor-market, and administrative constraints that will take time to address.

Stakeholder Perspectives: Structural Challenges and Long-term Opportunities

Stakeholders stressed that simply placing customers in any available job is insufficient; the nature of employment matters as much as the placement itself. Employment must be sufficiently stable, accessible, and adequately compensated to replace lost benefits and support household stability. Many entry-level and low-wage positions available to TANF customers were described as poorly aligned with their realities. The most common points of conflict are related to scheduling rigidity, limited flexibility, and conflicts with caregiving responsibilities.

Stakeholders noted that TANF job opportunities often do not help generate successful career outcomes. There is a difference between a job and a career, and many of the jobs available to TANF customers do not demonstrate or have career potential. Customers are disheartened to consistently see the same jobs they perceive as dead-end, misaligned with their skills and goals, and insufficiently flexible as their only options.

Customers may see losing benefits as an acceptable trade-off when formal, countable participation activities or job placements do not align with their needs or goals. Some customers described actively weighing the time required for participation against competing responsibilities, such as caregiving, informal work, or crisis management, leading to decisions to reduce participation or exit the program altogether. This scenario leads to reduced, if not zero, engagement, ultimately destabilizing families and limiting program participants' progress in job skills development.

Program exits driven by short-term or survival employment often fail to produce lasting stability, particularly where participation focuses on activity completion rather than advancement. Placements misaligned with customers' skills or long-term goals contribute to poor retention even when initial 'successful' program exits occur. Similarly, participation in training and workforce programs disconnected from local labor-market demand was viewed as unlikely to translate into sustainable program exits.

These challenges are compounded by persistent barriers to work, putting sustainable employment further out of reach. Unstable childcare, housing insecurity, health challenges, and caregiving responsibilities were consistently cited as obstacles to steady employment; these barriers persist even when customers are motivated to work. Many employment opportunities offered through the TANF program do not offer flexibility or understanding for additional challenges. Desire and willingness to work generally cannot make other challenges immediately disappear.

Recommendations on Approaches the District Can Pursue Over Time

A comprehensive review of the city's TANF program would provide leaders with insight into current operations and highlight opportunities to improve effectiveness. Three potential approaches include developing a strategic plan, conducting an overall program evaluation, and conducting a cost-benefit analysis of the District's TANF Program. A strategic plan would clarify DHS's long-term goals for TANF, align policy choices with operational priorities, and set a coherent direction for balancing fiscal sustainability, family stability, and employment outcomes. A program evaluation would assess how well TANF policies and services are functioning in practice, identify what is and is not working for different customer groups, and provide evidence on program effectiveness and unintended consequences. Lastly, a cost-benefit analysis would estimate the fiscal and social costs of TANF policies relative to their outcomes, helping DHS understand whether program changes reduce overall public expenditures or shift costs to other systems.

Improved internal communication and coordination, as well as communication and coordination between DC agencies and with external providers and partners, would reduce duplication, eliminate confusion, and build trust. Communication and coordination need substantial improvement beyond the specific challenge presented by the 2025 Act. Stakeholders acknowledged that achieving holistic improvements in communication and coordination would be difficult given fragmented roles and responsibilities, non-integrated data systems, high caseloads, and inconsistent messaging across programs. Still, it is paramount as customers need clear, consistent, and cohesive support across the many touchpoints with DC agencies, services, and programs to achieve success.

DHS could consistently recognize employment obtained outside formal programs. Stakeholders highlighted that employment secured independently by customers is not consistently visible or valued within current systems. TEP providers receive little credit for such outcomes, and customers receive no programmatic recognition beyond having a job. Over time, DHS could explore adjusting policies and performance metrics to better acknowledge off-program employment, while also addressing verification challenges and ensuring consistency across cases.

DHS could better align case management and training activities with customers' skills, interests, and local labor-market demand. Stakeholders emphasized that federal reporting requirements and activity-based compliance structures often prioritize participation over outcomes. This approach limits the focus on job quality and retention. While DHS cannot change federal requirements, stakeholders encouraged steps to better align case management and training activities with customers' skills, interests, and local labor-market demand. This includes a longer-term shift toward career pathways, as capacity allows.

To better serve TANF customers, outreach should extend to employers across the District who are not yet part of the TEP network. Stakeholders noted that many of the job opportunities recommended to customers do not lead to sustainable employment, let alone careers. They also noted that the business community was not included in the working group activities in 2016 or 2026. DHS should consider connecting with more employers in the District beyond those already engaged in the TEP network to identify more potential jobs and, ideally, career opportunities for TANF customers. Finding new and potentially more relevant employment opportunities could help reinvigorate participation and improve career outcomes for program participants.

Conclusion

Whether the 2025 Act ultimately relieves fiscal pressure depends only partially on the phased reductions in TANF benefit levels. Fiscal relief depends on whether households can stabilize after benefit reductions. If they cannot, costs may shift to housing, healthcare, child welfare, or other systems, potentially leaving families unstable.

Prolonged or broadly applied hardship extensions may preserve household stability but delay or offset cost reduction. More intensive enforcement and appeals processes can increase administrative costs, even as benefit levels decline for sanctioned customers. The 2025 Act may ensure TANF spending falls, but overall public costs might not.

Cost savings are more likely when benefit reductions are paired with employment opportunities, coordination across support systems, and hardship policies that prevent destabilization. Without these conditions, costs may shift elsewhere. The observations and suggested actions in this document may help alleviate burdens, challenges, or stress on the TANF program and its customers, and ultimately lead to improved fiscal conditions for both the District and the TANF customers it supports.

Throughout this project, the Academy spoke with several subject-matter experts to gain additional insights into several aspects of TANF. Their insights were critical to a holistic understanding of the national and local challenges. In particular, Teresa Derrick-Mills, formerly of the Urban Institute, echoed many of the working group's sentiments. Derrick-Mills emphasized the importance of coordination across benefit programs, noting that simultaneous reductions in TANF, childcare, and other supports can result in households experiencing multiple losses at once, increasing the likelihood of instability. She also highlighted the need for gradual transitions, observing that households accustomed to extended benefit receipt may not be prepared for abrupt changes in eligibility or requirements, and that phased implementation can reduce disruption. Finally, she reinforced concerns about communication, noting that even when agencies provide extensive outreach, customers may still experience confusion if the information is unclear, inaccessible, or not actionable.

Her comments align with the Academy's accounting of the working group's observations, emphasizing that coordination, pacing, and communication will be central to whether policy changes achieve their intended fiscal and programmatic outcomes.

DC's TANF program has a promising future. The steps and tactics outlined in this report will allow the District to minimize the impact on families as it deploys the 2025 Act. The District can also help families reach stability and reduce fiscal strain by evaluating and modernizing the TANF program. As a customer stated in the first listening session, "No one in this room wants to be dependent on TANF or any other program. We all want to be self-sufficient, able to provide for our families, and free to live our lives." TANF and other DC social programs have an opportunity to help customers achieve that simple goal.

Appendix I: Options for Implementation

The strategies below reflect stakeholder-informed implementation priorities and are presented as considerations for DHS based on observations gathered through this engagement. They are organized as an integrated execution plan to support DHS's implementation of the 2025 Public Assistance Amendment Act, mitigate destabilizing impacts on families, and ensure that enforcement mechanisms function as intended. The actions are sequenced to reflect how DHS would operationalize them across communications, case processing, and enforcement systems. Sequencing emphasizes communicating first, building hardship infrastructure second, and enforcing last, to reduce destabilization, limit administrative burden, and support more effective implementation of the 2025 Act.

Prepare and Inform Customers Before Enforcement Begins

Objective: Ensure customers understand what is changing, when it will happen, and what options they have *before* benefits are reduced or sanctions are applied. Without clear, early communication, customers are likely to ignore notices or mistrust the changes, leading to increased crisis responses, appeals, and administrative burden after enforcement begins.

Key Actions

- Launch a centralized, DHS-led, multi-channel communications campaign announcing upcoming changes.
    - Use plain language, consistent messaging, and repeated touchpoints designed to build trust and credibility.
    - Seek partner amplification (TEP providers, other DC agencies, community-based organizations), rather than leaving messaging to providers.
- Deliver individualized customer notices showing:
    - Time on TANF and proximity to step-downs
    - Expected benefit changes over time
    - Available pathways (participation, hardship, POWER, other supports)
- Clearly communicate "what customers can do now", including:
    - Steps to engage with services
    - Potential eligibility for hardship determinations
    - Referrals to other federal, District, and community resources

Stand Up a Clear Hardship Determination Infrastructure

Objective: Ensure hardship functions as a preventive mechanism, not a retroactive fix. If hardship pathways are unclear or slow, DHS risks inappropriate sanctions, inconsistent application, and avoidable harm to families—undermining both equity and efficiency.

Key Actions

- Finalize and publish a formal hardship framework, including:
  - Clear definitions and decision points
  - Distinctions between hardships, exemptions, and POWER
  - Explicit criteria for each type of hardship
- Establish standardized process mechanics:
  - Timelines for determinations, reviews, extensions, and expirations
  - Uniform request mechanisms (online and paper)
  - Documentation standards that minimize burden
- Build capacity to address overlapping and simultaneous hardships affecting individual customers.
- Design the process to be simple and navigable, recognizing customers are often already experiencing instability.
- Train DHS staff, TEP providers, and relevant partners on:
  - How hardship determinations work
  - How and when they should be initiated
  - How decisions are communicated and recorded

Integrate Hardship Screening into Sanctions Decision-Making

Objective: Ensure sanctions start with noncompliance as an *inability* to fully and effectively participate in the program. Without integration, sanctions risk becoming blunt enforcement tools that increase churn, appeals, and administrative workload while weakening engagement and trust.

Key Actions

- Require hardship screening before sanctions are imposed, not after.
- Embed hardship checkpoints into sanction workflows so:
  - Sanctions are paused when hardship indicators are present
  - Documentation and timelines support timely decision-making
- Explicitly allow hardship determinations to account for system failures, including:
  - Unavailable or oversubscribed activities
  - Provider capacity constraints
  - Referrals misaligned with customer circumstances
  - Administrative delays and data errors
- Ensure sanction notices are:
  - Timely
  - Written in plain language
  - Clear about what triggered the sanction and how to resolve it

Refocus Sanctions on Reengagement, Not Volume Enforcement

Objective: Use sanctions strategically—only when appropriate—to support engagement and manage caseloads. Strategic sanctioning can support fiscal goals and equity simultaneously, but only if systems are designed to prioritize accuracy, speed, and support.

Key Actions

- Reinforce sanctions as a last-resort corrective tool, paired with proactive outreach and case management.
- Reduce unnecessary workload by:
  - Minimizing sanctioning driven by missing or outdated information
  - Enabling rapid lifting of sanctions once compliance is achieved
- Consider shifting sanction initiation responsibility away from TEP providers, allowing them to focus on engagement and support rather than enforcement.
- Address technology and data issues that contribute to:
  - Delayed sanction removals
  - Conflicting case status across systems
  - Manual workarounds that drain staff time
- Establish a final review pathway for persistently non-participatory customers:
  - Conduct a last hardship review
  - Exit customers appropriately where continued participation is unlikely
  - Reallocate capacity to customers with greater engagement potential
- Recognize that limited labor market opportunities may affect customers' ability to translate participation into employment outcomes and incorporate this context into case assessments.

Appendix II: Historical Approach to Time Limits with Transitions and Paired Services

When TANF was enacted in 1996, states adopted widely varying approaches to time limits. A 2001 HHS-funded evaluation documented that states relied heavily on exemptions, extensions, and state-funded assistance to manage the transition.[21] This finding is consistent with the 1997 "Survey of the Status of States' Implementation of Welfare Reform," conducted by the American Public Welfare Association.[22] At that time, 24 states provided at least 12 months of transitional childcare after leaving TANF, 30 states provided diversion assistance,[23] and 36 states subsidized employment. Time limits alone had little independent effect on employment outcomes, according to the 2001 evaluation. It concluded that most employment gains following welfare reform were driven by work requirements, sanctions, and a strong late-1990s labor market. The prospect of reaching a future time limit, which many recipients never approached or expected to be extended, had little effect.[24]

Employment outcomes were stronger in states that paired time limits with robust employment-support services, including subsidized childcare, intensive job-search assistance, case management, transportation supports, and transitional or subsidized employment programs. States that enforced time limits without comparable supports saw reductions in TANF participation but no measurable increase in employment or earnings. Subsequent longitudinal studies confirm that while time limits reduced caseloads, services that lowered barriers to work were closely associated with sustained employment.[25]

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[21] Dan Bloom, Mary Farrell, and Barbara Fink, with Diana Adams-Ciardullo, Welfare Time Limits: State Policies, Implementation, and Effects on Families (Washington, DC: Manpower Demonstration Research Corporation, submitted to U.S. Department of Health and Human Services, Administration for Children and Families, Office of Planning, Research and Evaluation, 2001). Accessed at https://web.archive.org/web/20030411095255/http://www.acf.dhhs.gov/programs/opre/welfare_timelimits/welfare_timelimits.pdf.

[22] The American Public Welfare Association later became the American Public Health Services Association. The original survey report is not available online, but a summary table was reprinted in "Welfare Reform: Key Policy Decisions in 50 States," published by the Washington State Institute for Public Policy, February 1998. Accessed at https://www.wsipp.wa.gov/ReportFile/1535/Wsipp_Welfare-Reform-Key-Policy-Decisions-in-50-States_Full-Report.pdf.

[23] "Diversion assistance" offered support for immediate needs, sometimes as a lump sum cash payment, in lieu of enrolling in TANF. States also attempted to reduce enrollment by denying benefits to drug felons, requiring drug testing, limiting benefits for additional children conceived or born while parents are receiving benefits, and setting different rules for families newly arrived in the state.

[24] Bloom, et al., 2001.

[25] Mary Farrell et al., *Welfare Time Limits: An Update on State Policies, Implementation, and Effects on Families* (New York: MDRC, 2008); Congressional Budget Office, *Work Requirements and Work Supports for Recipients of Means-Tested Benefits* (Washington, DC: CBO, 2022).

Appendix III: Detailed Methodology

ACADEMY ENGAGEMENT

The National Academy of Public Administration, contracted by DC DHS, conducted a four-month engagement of research and constituent interactions to develop an understanding of what the perceived impact of the upcoming changes would be on the TANF community and how DHS should ideally deploy and apply the step-downs, hardship policy, and sanctions to do the least harm as the TANF program changes its prior dynamic. The following summarizes the Academy's activities throughout its contract with DC DHS.

PROCESS RESEARCH AND SME CONSULTATION:

The initial phase of the project focused on background research. To gain a high-level understanding of DC's TANF program, the federal program's history, and how other states are handling similar challenges, the Study Team reviewed resources produced by the Urban Institute, OPRE's Welfare Rules Database, and a Graphical Overview of State and Territory TANF Policies as of July 2023. The Study Team also spoke with several subject-matter experts from the American Public Human Services Association and the Urban Institute.

Listening Sessions and Individual Meetings:

Three 90-minute Customer Listening Sessions occurred on three different days in March 2026. DHS staff helped the Academy Team coordinate and communicate with customers. Approximately 50 TANF Customers attended. About half had been on TANF for more than 60 months, comparable to the full TANF recipient population. Three customers from each Listening Session who indicated they were available to participate in the full working group were randomly selected to join the working groups.

Listening Sessions also took place between the Academy Team and two other groups: TEP Providers and DC government staff. These sessions were also 90 minutes long. Additionally, Councilmembers and advocates who participated in the working group were offered the opportunity for follow-up one-on-one, 30-minute conversations with the Academy Team.

Working Groups:

The core of the Academy's engagement with DC TANF was the three working group sessions. Each session lasted 2.5 hours and combined level-setting presentations with small-group discussions to elicit feedback and insights. Individual session design and small-group conversations focused on topics identified by DHS in the scope of work. Representatives of six stakeholder groups were invited to each session:

- DC DHS
- Other DC Government Agencies
- Councilmembers and their staff
- TEP Providers
- Advocates
- TANF Customers

Drafting, Review, Feedback, and Presentation:

The collective insights, perspectives, and research collected by the Academy Team were organized and summarized into this document. DC DHS provided feedback on an initial draft. In June 2026, the Study Team presented findings and received additional feedback, which was incorporated into this final version.

Appendix IV: SME and Stakeholder Participation

The Academy thanks the following contributors who provided input:

SUBJECT-MATTER EXPERTS

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Janiqua Brown
Ta'Lexus Christian
Brandy Harper
Tynique Jackson
Rekia Kelly
Kendra Kelly
Latasha Kelly
Meosha Mapp
Kimone Mitchell
Cierra Mitchell
Sade Phillips
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Valencia Roye
Kianna Smith
Jessica Warren
Kyeesha Williams
Nichelle Wooden

*This list represents only the customers who consented to having their names included.

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Appendix V: About the Academy and Academy Staff

The National Academy of Public Administration is an independent, nonprofit, and nonpartisan organization established in 1967 and chartered by Congress in 1984. It provides expert advice to government leaders in building more effective, efficient, accountable, and transparent organizations. To carry out this mission, the Academy draws on the knowledge and experience of its over 1,000 Fellows—including former cabinet officers, Members of Congress, governors, mayors, and state legislators, as well as prominent scholars, career public administrators, and nonprofit and business executives. The Academy helps public institutions address their most critical governance and management challenges through in-depth studies and analyses, advisory services and technical assistance, congressional testimony, forums and conferences, and online stakeholder engagement. For more information on the National Academy of Public Administration, its Fellows, publications, and working groups, visit us at www.napawash.org.

Academy Staff

Brenna Isman, Senior Director for Research and Government Solutions. Ms. Isman has worked at the Academy since 2008 and oversees all programmatic activities, providing strategic leadership, project oversight, and subject-matter expertise to project teams. Prior to this, Ms. Isman was a Project Director managing projects focused on organizational governance and management, strategic planning, and change management. Her research engagements have included working with the National Aeronautics and Space Administration, the Environmental Protection Agency, the Social Security Administration, the Department of Veterans Affairs, as well as multiple regulatory and Inspector General offices. She is an experienced facilitator, and her expertise focuses on the development of communication and business strategy frameworks, analysis of ongoing transformation initiatives, and strengthening stakeholder engagement. Ms. Isman holds an M.B.A. from American University and a B.S. in human resource management from the University of Delaware.

Dr. Nancy Augustine, Director, Center for Intergovernmental Partnerships. Dr. Augustine joined the Academy in January 2019 and was named Director of the Center for Intergovernmental Partnerships in July 2021. Dr. Augustine has led studies for numerous federal agencies, including work for the Legislative Branch, the Department of Commerce Office of Inspector General, and the U.S. Merchant Marine Academy (DOT). She specializes in intergovernmental relations, public management, policy assessment, environmental and cultural resource protection, comprehensive and strategic planning, state and local fiscal issues, and investment planning for facilities and infrastructure. In previous roles, she conducted research for the Department of Housing and Urban Development, the Department of Labor, the District of Columbia Auditor, and the Pew Charitable Trusts. Topics include affordable housing, housing finance policy, housing market trends, and state-level social support programs. She also worked in local government for ten years, in long-range planning and policy development. Dr. Augustine holds a Ph.D. in public policy and public administration from the George Washington

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Miles Murphy, Senior Manager for Research and Government Solutions: Mr. Murphy has worked on studies for numerous organizations, including the Pew Charitable Trusts, the Center for Accountability, Modernization, and Innovation, and the National Association of Counties. Miles' focus areas include governance, intergovernmental systems, resilience, strategic planning, and workforce. Miles previously worked in local government as a senior community and environmental planner. Mr. Murphy holds an M.S. in coastal and ocean policy (a blend of environmental science and public administration) from the University of North Carolina, Wilmington.

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