

The TANF Reductions in FY27 and FY28 Are Not Informed, Do Not Account for Current Realities in the District, and Will Ultimately Harm Thousands of Children

*A Report from Advocacy Organizations that Participated in the 2026 TANF Working Group
Organized by the DC Department of Human Services*

April 28, 2026

Summary

This report is from the advocacy organizations that participated in the DC Department of Human Services (DHS) Temporary Assistance for Needy Families (TANF) working group in February and March 2026.¹ It is intended to complement the report being prepared by the National Academy of Public Administration (NAPA) and to reflect our unique perspectives.

Our report makes the following points, described in more detail below:

- The TANF working group focused primarily on possible hardship exemptions to time limits and sanctions. We believe the working group should have also discussed the rationale for these policy changes, given that they reverse important policies affecting vulnerable children adopted a decade ago by another Bowser Administration working group. We also believe the working group should have discussed the decision to, and effects of, eliminating the annual Cost of Living Adjustments (COLA) for TANF benefits.
- Reinstating time limits and increasing sanctions will hurt and punish families, despite clear failures in TANF's employment program and proposed FY27 reductions to employment training program (TEP), shrinking job opportunities in DC amidst rising unemployment, and reduced access to child care as a waiting list is instituted this fiscal year.
- DHS has largely justified the time limit and sanctions policies as a matter of cost savings. However, the deep cuts in cash assistance are likely to result in higher government costs for the District's other social service programs, as thousands of families are pushed into deep poverty, with long-term harmful impacts.
- These cuts will have a particularly debilitating impact on Black residents' financial stability, who comprise nearly 97% of TANF recipients. TANF cuts will exacerbate racialized marginalization in the District.
- We have serious doubts about DHS's ability to administer exemptions (also called hardships) from time limits and sanctions in a timely and accurate way.

Unlike other cuts to federal programs such as SNAP and Medicaid, the TANF changes are District initiated. We believe that time limits and increased sanctions should be eliminated, and the benefit COLA reinstated. The best approach to achieving TANF savings is to improve case management and employment services and to address the benefits cliff, which makes it hard for parents to transition to employment.

In the absence of eliminating time limits and enhanced sanctions, we have proposals for appropriate hardship exemptions and processes for implementing them.

The Dramatic Reversal of TANF Time Limit and Sanctions Policies Is Not Justified

The time limit and sanctions policies adopted in the FY 2026 budget represent a dramatic departure from the results of a DHS working group convened a decade ago, which engaged in a comprehensive, months-long process, and ultimately rejected time limits. It recommended only modest, federally required sanctions for not fully meeting work participation requirements.² By contrast, the FY 2026 changes came with little justification, or any substantial response, to clear and long-standing research demonstrating that time limits and sanctions cause harm without notably improving employment outcomes, as outlined below:

- **Most TANF recipients work:** NAPA reported that 76% of current TANF recipients had some work experience and that 55% had worked for four or more years; that is very close to the 58% who had received four or more years of TANF assistance. Neither NAPA nor DHS provided evidence to suggest TANF recipients do not want to work or that TANF policies discourage work.
- **TANF recipients typically end up in low-wage jobs:** DHS recently reported that families leaving TANF earn roughly \$2,000 a month on average, or less than the federal poverty line (FPL) for a family of three, and far below the amount needed to make ends meet in DC.³ This suggests that a main challenge facing TANF recipients is a lack of living-wage jobs and/or the failure of TANF employment services to prepare recipients for living-wage jobs.
- **Time limits and sanctions do not increase parental employment:** Research across the U.S. shows that parents cut off from TANF due to time limits and sanctions are less likely to work than those who leave on their own. According to several studies, the majority of parents cut off due to sanctions fail to find work. While DC's time limits and sanctions will not fully eliminate assistance, this research suggests that time limits and sanctions don't lead to improved work outcomes.⁴

- **Time limits and sanctions increase deep poverty:** One review found that deep poverty rates rose in six of the 11 reviewed TANF programs with work requirements and didn't fall significantly in any of the surveyed programs.⁵
- **TANF cuts are not justified by claims of excessive budget growth:** Local TANF expenditures rose 15 percent between 2019 and 2024, adjusting for inflation, while DC's overall general fund expenditures grew 11 percent during the same period.⁶ Moreover the TANF time limit, sanctions, and COLA elimination will reduce cash assistance expenditures more than 30 percent between 2026 and 2029, compared with an overall 4 percent reduction in local fund expenditures needed to balance the budget during the same period.⁷ **There is no reason that a program serving the most vulnerable children in DC should face disproportionate budget cuts in tight fiscal times.**
- **The depth of the time limit and sanction benefit cuts is staggering compared with the 2016 Working Group's recommendations.** The 2016 TANF working group convened by the Bowser Administration recommended that 80% of the full TANF grant be considered the "child portion," without time limits or sanctions, "to ensure that there are resources in the home to support the child even when the parent may not be engaging in TANF-related activities." The working group also recommended there be no imposition of a time limit on the parent portion. The working group recommended that TANF benefits should fall by no more than 12% due to sanctions.⁸ Yet, under the FY 2027 time limits and sanctions, a family's benefit could be reduced by 50%.⁹ And the proposed FY 2027 Budget Support Act released by Mayor Bowser would reduce benefits entirely for families when a parent has received aid for 60 months, starting in FY 2028.¹⁰

Time Limits and Increased Sanctions Will Hurt and Punish Families

The reinstated time limits and increased sanctions were adopted despite clear failures in TANF's employment program (acknowledged by both customers and DHS itself) and at a time of considerable economic challenges. If finding a living-wage job is not realistic for many TANF recipients, then time limits and sanctions will harm families.

One of the stated goals of the federal TANF law is to "end parent dependency on government benefits through work."¹¹ However, this requires available jobs that match the realities of TANF families – jobs with consistent hours, flexibility to attend to family needs, paid leave, childcare, and appropriate skill matches. This is not the experience of TANF recipients currently navigating DHS's TANF Employment and Education Program (TEP).

Recent Performance Oversight data from the DC Council highlights TEP's failure to reliably connect TANF recipients with jobs. The number of new employment placements per 1,000

TANF work-eligible customers (monthly average) has a target of just 18 placements over the year. The breakdown for each quarter shows that DHS has not met even this modest goal:

- Q1: 3
- Q2: 2.3
- Q3: 2.6
- Q4: 2.4 with a total of 10.3 on average of new employment placements for the year.¹²

DHS also reports on the percent of TANF employment program participants who participated in eligible work activities – with a goal of 25% of participants engaging over the year. The breakdown of each quarter is:

- Q1: 12%
- Q2: 15%
- Q3: 17%
- Q4: 16% with a total average of 15% participants participating for the year.¹³

The TEP program’s dismal statistics show that its ostensible goal of ending TANF reliance by facilitating connection to gainful employment is misaligned with the realities faced by TANF recipients. DHS proposed that they address the lack of success in employment programs by “launching Jumpstart to Jobs (J2J)—a pilot initiative focused on creating career pathways for TEP customers. Using assessment and survey data, J2J will identify industries of greatest interest and partner with TEP providers to deliver targeted training that leads to job placements within months. This approach aims to close the skills gap and connect customers to sectors with real hiring potential.”¹⁴

The fact that DHS recognizes the need for a more effective approach to helping TANF recipients get into a career pathway – and that they are just now launching a *pilot* program to explore that – is a strong indication that time limits and enhanced sanctions are, at a minimum, premature.

TANF Cuts Do Not Make Sense Amidst a Declining Economy and Child Care Wait List

The cuts fail to acknowledge that DC’s unemployment is at a high¹⁵, job creation is down¹⁶, and we are in an affordability crisis.¹⁷ Child poverty continues to rise: 28% in 2024, up from 17% in 2023, and of those children in poverty, 46% of them are Black children. TANF is helping to cover the basic needs of those experiencing these realities.

DHS acknowledged in their Performance Oversight responses that a poor economic climate is making it hard for TANF recipients to find employment: “New employment placements remain low due to accelerated federal job cuts in the D.C. region since early 2025, compounded by budget constraints and slowed hiring in key sectors like hospitality, healthcare, and administrative services.”¹⁸

In the same Performance Oversight responses, DHS admits they have “not completed a labor force analysis and [are] not aware of such an analysis that would allow the agency to match TANF customers with available jobs in the District.” This lack of analysis seems at odds with the agency's plans for J2J. The District is in need of an analysis to locate the gaps in our job market and identify how those gaps would align with TANF recipients who seek employment.

Moreover, as the DC Child Care Subsidy program has grown in recent years, helping more DC families pay for child care, so has the program’s budget.¹⁹ Many TANF families rely on child care subsidies to allow them to work. However, the DC government has decided to cap spending by implementing a child care subsidy waitlist policy for the first time since 2005.²⁰ TANF recipients not being able to receive child care will further hinder their ability to engage in the workforce.²¹

TANF Recipients Want to Work and Want More Support from DHS

TANF recipients want to work. People can only work if jobs are readily available and childcare is accessible. A recent focus group conducted by DCFPI illustrates these realities well.²²

Focus group participants report that TEP does not support “career-ladder promotion.” Instead of advancing participants toward higher-quality, sustainable employment, participants highlighted the limited jobs available through TEP and the misalignment between those opportunities and their career aspirations. One participant reported that “It just seems like the same five opportunities, no matter what vendor you’re in.” Focus group participants without higher education — a reality for most DC TANF recipients — described being steered into low-wage, work that is also misaligned with the realities of raising a family, such as hospitality or security roles.

Moreover, focus group participants expressed deep frustration with how difficult it was to translate TEP participation into actual employment. Because TEP is not a job guarantee program, participants must still navigate the full job application process — a process that does not always result in an actual job. Even more discouraging for participants was the amount of time and energy they invested in skill-building activities that failed to lead to concrete opportunities. Participants described attending training and classes through their vendor, yet feeling that these efforts existed in isolation, rather than as part of a coordinated pathway toward their career goals. One participant who took entrepreneurship courses shared that, after finishing the program, “There [was] no real setup for success... and there wasn’t necessarily a pipeline in order to be able to become a business owner.” Although she had access to a case manager, she reported still lacking “the necessary connected resources... to go from one stage to the next stage.”

It is also important to acknowledge that – beyond the limitations of DC’s TANF work preparation services – work is not the fix for every TANF recipient. The District’s TANF program must also be improved to support those who cannot work – for example those with

disabilities that make work difficult or are caretakers for children with disabilities. These individuals should still have access to services that would help them improve their economic stability even if they are unable to work full-time.

TANF Cuts Will Lead to Higher Costs as Families in Financial Crisis Turn to Emergency and Other Services

DHS has stated cuts are necessary because TANF has become financially unsustainable.

Research and common sense show that pushing families into extreme poverty will result in increased hunger, homelessness, absenteeism, poor academic performances, and child neglect due to parental stress.²³

Currently, the maximum TANF benefit for a family of three is \$803, or 35% of the federal poverty line. The elimination of Cost of Living Adjustments (COLA) for all TANF recipients will quickly lead to the devaluation of the benefit over time, as the cost of living rises with inflation. Even more devastating will be the reality for those TANF recipients subject to a time limit and sanction. This means that, for some families, the maximum benefit will amount to less than 7% of the FPL in today's terms.

These cuts will have deep and devastating impacts on families. DHS has reported that 15,000 children, almost half the children currently on TANF, will be impacted. By 2028, TANF will drop to \$201 per month for a family of three subject to time limits; if this family also faces sanctions in the same year, their benefits will be just \$151 a month. And under the most recent budget proposal from Mayor Bowser for FY 2027, benefits would be eliminated entirely starting in FY 2028 for families where parents have received 60 months of aid.

DHS has not acknowledged that cuts may lead to increases in homelessness, child neglect or other needs that will increase demand for DC-funded services, and it has not demonstrated that the District is prepared to absorb higher costs in these and other areas. For example, the average annual cost of keeping a child in foster care is \$42,884, and the average annual cost of shelter for an unhoused child is \$49,700, while the maximum annual TANF benefit for a household of three is \$9,636.²⁴ Moreover, given that DHS will have to implement these changes—including expanded hardship exemptions—while administering significant changes to SNAP and Medicaid, the agency's administrative costs will balloon while program services continue to suffer.

DHS Has Not Demonstrated the Ability to Administer Time Limit and Sanctions Exemptions in a Timely and Accurate Way

DHS is already a strained and struggling agency, with a flawed computer system that often fails to process District residents' applications, recertifications, or other paperwork in a timely and

accurate manner.²⁵ Their District Access System (DCAS) frequently fails to ensure benefits are maintained for DC residents across the myriad of pre-existing programs within the District. Implementing time limits and sanctions will impose additional administrative responsibilities on an agency that is having difficulty accurately preparing to meet the impending federal obligations for SNAP and Medicaid.

It is not clear whether DHS has data about how many TANF recipients will simultaneously be impacted by SNAP and Medicaid work requirements, but per DHS data, between 94% and 98% of TANF recipients also receive SNAP. (Note that only families whose children are all 14 or older are affected by new SNAP work participation requirements).²⁶ Under current law, the TANF cuts will go into effect just 2-3 months after being finalized in the FY27 budget – 4 months after expanded SNAP work requirements go into effect and 3 months before Medicaid work requirements. That is a recipe for disaster. Moreover, DHS has not increased staffing capacity to address hardship exemption reviews and requests. DHS in FY2026 spent \$90M, alone, on eligibility determination for benefits.

DHS should not endeavor to impose such drastic cuts to TANF at a time where they will be burdened by the logistics necessary to implement the federal changes to SNAP and Medicaid under H.R. 1.²⁷ Perhaps most glaringly, the new SNAP work requirements do not even align with TANF's own employment mandate (for example, an individual could comply with SNAP work requirements but still be found not in compliance with TANF work requirements and thus be subject to a sanction under TANF).

More specifics can be found in **Attachment A. Hardship Exemptions & Extensions and Procedural Requirements**. The memo outlines how DHS should substantively and procedurally implement a hardship policy. However, any hardship policy, even a comprehensive policy outlined in the attached memo (Attachment A) will still have families fall through the cracks, particularly those families who are most vulnerable.²⁸ We suspect much like in other jurisdictions, the agency will spend more on administrating TANF than actually putting money in the pockets of DC residents.²⁹

Recommendations

The information provided above leads us to **recommend that the elimination of COLA, the reintroduction of time limits and increased sanctions adopted in the FY2026 budget are not justified on fiscal or policy grounds and should be reversed**. The 2026 working group (like the 2016 one) confirmed that the best approach to achieving TANF savings is to improve case management and employment services and addressing the benefits cliff that makes it hard for parents to transition to employment.

In the absence of that, **we recommend that the time limit should be amended to be prospective as of October 1, 2026, setting every family's TANF time clock at zero.** A time limit that is imposed retroactively punishes families for receiving assistance at a time when there were no time limits and no expectations that their assistance would be time limited. If a time limit is to serve as an incentive to engage more actively in work preparation (as noted above, time limits don't actually do that in practice), it only makes sense to make it prospective.

We also recommend that the District follow the practice of many states by **re-setting a parent's time clock to zero if they leave TANF for employment for a specified period of time**, such as a period of two years in which a parent is employed or receiving unemployment insurance for a majority of months.

Finally, given our deep concerns about the ability of DHS to implement an exemption policy without allowing some eligible families to be looked over – and given the harm that a deep benefit reduction would have on children – **we recommend that DHS should be required to assume all families will face hardship and that a time limit benefit reduction would only occur after DHS demonstrates a recipient does not meet any exemption criteria.** This provision would be voided if a parent does not respond to multiple reasonable outreach requests without good cause.

If the District continues to have time limits of any kind, we recommend that the District adopt a set of hardship exemptions that:

- Stop the TANF clock if certain conditions occur before a parent has received 60 months of assistance.
- Allows a parent to reverse a time limit benefit reduction that has been imposed if the incident occurs after such a reduction
- Reduces all parents' current time clock for any documentable period of exemption eligibility prior to the adoption of the time limit.

Finally, we recommend that implementation should be delayed until at least January 2027 to allow for individual communication/outreach to families that will be impacted and for hardships to be determined in advance of the imposition of benefit reductions. As part of that transition, we encourage DHS to provide only a time limit or sanction reduction to a family, and not both.

ATTACHMENT A.

Subject: Hardship Exemptions & Extensions and Procedural Requirements

Date: February 18, 2026

Overview

Below illustrates what we would like to see both substantively and procedurally if DHS were to implement a hardship policy. However, we remain concerned that a hardship policy even a comprehensive policy outlined below will still have families fall through the cracks particularly those families who are most vulnerable.¹ DHS is not equipped to handle the administrative burdens of a hardship policy – and we suspect much like in other jurisdictions, the agency will spend more on administrating TANF than actually putting money in the pockets of DC residents.²

Implementing time limits and a subsequent hardship policy would require clear guidance, technical assistance to support policy design and effective implementation, and rigorous monitoring and evaluation to understand impacts on participants and agencies.

To implement each of these factors is going to cost the District. For example, DC would need to invest in further infrastructure to support navigating a hardship policy. We know that DCAS is plagued with issues – kicking people off of benefits erroneously and having to endure a labor extensive process to reinstate benefits³ – that will need to be addressed. The District has spent millions on trying to get DCAS right. Moreover, DHS already spends millions on overtime to address the administrative burdens of their programs already.⁴

¹ Most families who have been on TANF longer than 60 months have multiple barriers to work and identifying their hardships is difficult.

² For example, after Georgia began work requirements, the administrative spending for the demonstration was \$54.2 million out of the \$80.3 million in total demonstration spending in the first 4.5 years, according to data reported by Georgia to CMS. *See* US Government Accountability Office, *Medicaid Demonstrations: Information on Administrative Spending for Georgia Work Requirements*, available at: <https://www.gao.gov/products/gao-25-108160>.

³ For example, residents who are losing SSI due to income not because of change in disability status are being kicked out of their health insurance even though the qualification of their disability has not changed.

⁴ This would be a great performance oversight question – how much have we spent on DCAS? There is current \$2M contract to "provide operations and maintenance to the District's Administrative Services Organization system." *See* [CA26-0367](#) – Proposed Contract with Public Consulting Group LLC to Contract No. CW123727. *See also* Committee on Health and Committee on Housing, Roundtable Continued Challenges with the DC Access System and Public Benefits Enrollment, (July 2, 2024), available at: <https://www.youtube.com/watch?v=fRC5DyoAN6Y>. In FY24, DHS reported overtime for team members that earned \$100,000 which totaled \$936,178 as well as the top twenty-five overtime earners which cost the city an additional \$1,233,780. This does not even encompass all overtime from DHS. The average overtime amount for the top twenty-five overtime earners was \$49,351. *See* FY2024 DHS Performance Oversight Responses, response to Q4, available at: <https://lims.dccouncil.gov/Hearings/hearings/706>.

Moreover, based on our experiences with POWER implementation, the realities of connecting families with hardship exemptions under POWER have been difficult. Families cannot apply to POWER directly – they can only be referred for screening by a DHS case worker. DHS, shared in a public meeting within the last six months, there are only 200-300 families currently enrolled. We speculate that given the prevalence of disability alone among TANF recipients, these figures do not represent all potentially eligible POWER families. It is likely that due to the way POWER applications work (no direct application; referral only), most families do not know about the availability of POWER.

A recent example from UPO briefing (2/17/26), we heard directly from a mother receiving TANF who had not heard of POWER despite her reporting on several factors that we believe would allow her to at least be referred for review. The onus is on DHS to move families into POWER, and they struggle to do that – imagine how difficult it will be under a more comprehensive hardship policy (which would be needed at a minimum if time limits went through).

Determining eligibility, correcting errors made on eligibility and/or exemptions, moving through appeals of denials, ensuring accurate renewals, identifying those with qualifying hardships, and keeping track of hardships including changes (plus more) will put additional and immense pressure on DHS at a time they are already navigating substantial changes to other human service programs due to federal level decisions.⁵

Exemptions and Extensions

Overview

When thinking about how to identify extensions and exemptions for TANF, we have broken them down into two broad categories with two subcategories.

(1) First there are the exemptions – meaning that sanctions and time limits should not apply at all due to circumstances/conditions of the TANF recipient.

(2) Second there are extensions – meaning that even after reaching 60 months (5 years) a TANF is eligible to stay on TANF for additional time due to circumstances/conditions of the TANF recipient. We have broken down extensions into two further distinct scenarios:

⁵ And an added complication is these systems do not speak to each other. So, while DHS is tracking SNAP work requirements those are separate from TANF work requirements and the systems don't speak to each other. This is similar how case management across systems are also not streamlined – some TANF recipients have identified having multiple case managers across programs.

(2)(a) reaching the time limit & receiving an extension – at the 60-month mark or after the 60-month mark, the TANF recipient is eligible for an extension or eligible to come back to TANF due to circumstances/conditions outline below; and (2)(b) delaying the time limit & not count to 60 month total – a TANF recipient total time on TANF would not equal 60 months if they met the circumstances/conditions outlined below (essentially pausing the time limit clock when certain circumstances/conditions are met).

(1) Exemptions

- Align with POWER exemptions with the recommendation that that DHS policy should change to allow access on a voluntary basis to a full range of employment prep services (education, training, transportation, child care) to anyone who is in POWER or has a time limit hardship exemption.
 - Have disabilities themselves, or are caring for individuals with disabilities;
 - Could expand to mental or physical health conditions that are associated with lower likelihood of work 30 hours per week
 - Could expand to include
 - Are DV survivors;
 - Teen parents under the age of ~~19 years old~~ 25 years old or over age 60;
 - Adults over 60;
 - No high school degree;⁶ or
 - anyone who is complying with the work requirements laid out in their Individual Responsibility Plans and is not sanctioned

(2)(a) Extension at 60 Month Mark

- Can prove they will suffer hardship if TANF is not extended or if a former TANF recipient comes back after 60-month mark and can show new hardship
 - Hardship defined as:
 - Inability to pay rent which leads to a risk of eviction or homelessness
 - Inconsistent, unavailable, or unaffordable childcare or mismatch between availability and work hours
 - Food insecurity
- If at the time of 60-month mark, participant is in approved education/training that will be finished within 6 months after the end of 60 months
- Participating in an intensive program that prevents working at least 30 hours per week and will finish within 6 months after the end of 60 months (including domestic or sexual

⁶ An Urban Institute article identified six indicines of barriers to employment that were studied between 2002-2006. These included (1) no high school diploma; (2) no work in path two years; (3) child under age 1; (4) child on SSI; (5) work-limiting health condition; (6) poor mental/emotional health. See [TANF Recipients with Barriers to Employment](#).

violence, homeless services, mental health, substance abuse, and vocational rehabilitation programs)

- At the time of expiration, recipients have a time limited physical condition that prevents working at least 30 hours per week but will end in 6 months

(2)(b) Extension that Stops the Clock to Reaching 60 Month Mark

- Was on TANF during a declared public health emergency and natural disasters
 - Example: COVID-19 pandemic⁷ (March 2020 to May 2023)⁸
- Declaration of a recession or depression in the US economy
 - Example: Great Recession (December 2007 to June 2009)⁹
- Involuntary job loss
- Death of a close loved one
- Participation in approved education/training
- A parent is pregnant in the third trimester or has a child under age two
- Unemployment rate is 5.7% or more¹⁰
- Recipients have a time limited physical condition that lasts from 3 months to 1 year and prevents the TANF recipient from working at least 30 hours per week
- Participating in an intensive program that prevents working at least 30 hours per week (including domestic or sexual violence, homeless services, mental health, substance abuse, and vocational rehabilitation programs)
- Other personal circumstances that make it very difficult to participate in required activities

Procedures DHS Must Meet Before TANF Time Limit Can be Imposed

This section outlines what DHS must do before a TANF limit can be imposed. There are three distinct time periods that will require DHS to take action: (1) prior to any time limit implementation; (2) at the time of every individual TANF applicant/beneficiary’s application and recertification; and (3) at the 180 days and 90 days before a family has received TANF for 60 months.

1. Prior to any time limit implementation, DHS must:
 - a. Subtract months during the COVID lockdown from all current recipients’ total months of benefits receipt;

⁷ “In response to the pandemic, a total of 21 states made changes to their state time limit policies. Of those, 9 states provided an exemption to the time limit or temporarily suspended the time limit, and 12 states provided time limit extensions. Of these states, some granted blanket extensions for all participants, and others granted extensions based on specific hardship caused by the pandemic.” See [States Can Use TANF’s Flexibility to Extend Cash Assistance for Families in Need | Urban Institute](#).

⁸ The COVID-19 Public Health Emergency was from March 2020 to May 11, 2023 according to HHS. See [COVID-19 Public Health Emergency | HHS.gov](#).

⁹ The Great Recession according to the Federal Reserve lasted from December 2007 to June 2008. [The Great Recession | Federal Reserve History](#)

¹⁰ The average unemployment rate was 5.7% from 2024-2025. See <https://fred.stlouisfed.org/series/DCDIST5URN>.

- b. Provide every TANF beneficiary with an accounting of the number of months they have received TANF
 - c. Create a streamlined process for TANF beneficiaries to contest DHS's accounting by creating a clear one-page form that beneficiaries can complete and a blank form with instructions on how to complete it attached to every accounting notice
 - d. Publish in its policy manual and on the DHS website grounds for extensions and exemptions from the time limit; and
 - e. Create and publish in its policy manual and on the DHS website processes and documentation requirements for claiming extensions and exemptions.
2. At the time of every individual TANF applicant/beneficiary's application and recertification, DHS must:
- a. Provide (and document that they provided) oral and written information about the ability to claim an exemption, the exemption criteria and assistance in doing so (providing forms, procedures, etc.);
 - b. An accounting of the months that the individual has already received TANF with the number of months left in their 60 months;
 - c. Attach to every accounting instructions on how to contest DHS's accounting and attach a clear one-page form that a person can complete (and assistance completing if necessary) and
 - d. Information about the services that a work vendor can provide and instructions about what beneficiaries should do if they are not getting this assistance.
3. At the 180 days and 90 days before a family has received TANF for 60 months, DHS must:
- a. Provide the recipient with an accounting of the months they have received TANF;
 - b. Attach instructions on how to contest DHS's accounting and include a clear-one page form that a person can complete to contest DHS's accounting
 - c. Assess whether the recipient is eligible for a hardship exemption or extension and help the recipient in documenting the need for an exemption or extension; and
 - d. Provide the recipient with an explanation of what their benefits amount will be once the cut is imposed.

¹ The authors of this report participated in the Department of Human Service 3 session TANF Working Group. The authors include: Children’s Law Center, DC Fiscal Policy Institute, Legal Aid Society of the District of Columbia, Bread for the City, and United Planning Organization. They are supported by the TANF is Still a Lifeline Coalition, <https://childrenslawcenter.org/our-impact/systemic-reform/tanf-is-still-a-lifeline/>.

² “Recommendations for Development of a TANF Hardship Extension Policy for Washington, DC,” DC Department of Human Services, October 18, 2016.

https://dhs.dc.gov/sites/default/files/dc/sites/dhs/publication/attachments/TANF%20Hardship%20Report_0.pdf

³ According to the MIT Living Wage calculator, a household with 1 adult and 2 children needs \$140,034 annual income before taxes. See [Living Wage Calculator - Living Wage Calculation for Washington-Arlington-Alexandria, DC](#).

⁴ [The Social and Economic Impact of Sanctions and Time Limits on Recipients of Temporary Assistance to Needy Families - PMC; TANF Cash Assistance Helps Families, But Program Is Not the Success Some Claim | Center on Budget and Policy Priorities](#).

⁵ LaDonna Pavetti and Ali Zane, “TANF Cash Assistance Helps Families, But Program Is Not the Success Some Claim,” Center on Budget and Policy Priorities, August 2, 2021.

⁶ Expenditures of DC funds on TANF cash assistance rose from \$65.7 million in 2019 to \$94 million in FY 2024. This is an increase of 15% after adjusting for inflation using the CPI-U. Overall local fund expenditures rose from \$7.94 billion in FY 2019 to \$11.07 billion in FY 2024, an increase of 14 percent after adjusting for inflation.

⁷ The Fiscal Year 2026 Financial Plan shows local fund expenditures would fall from \$11.9 billion in FY 2026 to \$11.5 billion in FY 2029, a drop of 4 percent. TANF cash expenditures were projected to be \$117 million in FY 2026 in the FY 2026 budget, and the Fiscal Impact Statement for the FY 2026 budget indicated that TANF cash assistance would be cut \$51 million by FY 2029.

⁸ “Recommendations for Development of a TANF Hardship Extension Policy for Washington, DC,” op cit.

⁹ Ed Lazere and Lizuly Meraz, “TANF Is a Lifeline for DC Families with Children,” United Planning Organization, November 2025, <https://www.upo.org/wp-content/uploads/2025/11/UPO-TANF-Policy-Paper-Nov-2025.pdf>.

¹⁰ Proposed Fiscal Year 2027 Budget Support Act of 2026. SUBTITLE G. TANF BENEFITS.

¹¹ See <https://acf.gov/ofa/programs/tanf/about> for legislative purposes of TANF

¹² FY2026 Department of Human Services Performance Oversight Responses, response to Q15 b. 2. (DHS-Responses-to-Pre-FY25-POH-Questions-FINAL.pdf)

¹³ FY2026 Department of Human Services Performance Oversight Responses, response to Q15 b. 3. (DHS-Responses-to-Pre-FY25-POH-Questions-FINAL.pdf)

¹⁴ *Id.*

¹⁵ [Labor Market Weakens Nationwide While D.C. Tops U.S. Unemployment List](#)

¹⁶ [US economy creates far fewer jobs under Trump than Biden; The Biden Boom and Trump Slump: A Serious Comparison of the Two Economies](#).

¹⁷ [The DC Area Has an Affordability Problem, and Disruptions to Nonprofits’ Government Funding Could Worsen It](#).

¹⁸ FY2026 Department of Human Services Performance Oversight Responses, response to Q15 b. 2. (DHS-Responses-to-Pre-FY25-POH-Questions-FINAL.pdf)

¹⁹ [What DC’s New Child Care Subsidy Waitlist Could Mean for the City’s Infants and Toddlers | Urban Institute](#)

²⁰ *Id.* See also [Implementation Recommendations of Forthcoming Child Care Subsidy Waitlist | Under 3 DC](#).

²¹ [Voices for Change: Perspectives on Strengthening Welfare to Work From DC TANF Recipients | DC Fiscal Policy Institute; TANF realities can hinder child care and job training support | Urban Institute; Most Parents Leaving TANF Work, But in Low-Paying, Unstable Jobs, Recent Studies Find | Center on Budget and Policy Priorities; DC FPI TANF focus group report FINAL](#).

²² Maria Manansala, TANF Should be an Element of DC’s Economic Growth Agenda, (March 10, 2026), available at: <https://dcfpi.org/all/32867/>.

²³ Children’s Law Center, “TANF Cuts Will Cause Lasting Harm to Children,” at <https://childrenslawcenter.org/wp-content/uploads/2026/01/DC-TANF-Cuts-Will-Harm-Children-in-Many-Ways.pdf>

²⁴ Foster Care Rates [2017 (note have not been updated since)]; [5.-Subsidy-Information_1.pdf](#); [Math calculations](#); DC Policy Center report: [There are large variations in unit costs and grants for youth homelessness, and providers](#)

cite need for additional funds - D.C. Policy Center; Microsoft Word - Youth Homelessness PER.docx; and TANF monthly payment calculations, Temporary Cash Assistance for Needy Families (TANF) | dhs

²⁵ FY2026 Department of Human Services Performance Oversight Responses, response to Q177 (d) (SNAP applications processed past 30-day deadline increased from 7.4% in FY 2025 to 10.07% in FY 2026); Q177(d) (SNAP applications processed past 30-day deadline increased from 7.4% in FY 2025 to 10.07% in FY 2026); Q181 (Timeliness for processing SNAP applications decreased from 84% in FY 2025 to 79% in FY 2026); Q202, 203 (over half of TANF recipients terminated in FY 2025 and FY 2026 were reinstated, including DC residents who submitted documents for verifications that DHS never reviewed; DHS does not track how many TANF recipients submitted document verifications that DHS did not review in time who were later reinstated) (DHS-Responses-to-Pre-FY25-POH-Questions-FINAL.pdf)

²⁶ FY2026 Department of Human Services Performance Oversight Responses, response to Q207. (DHS-Responses-to-Pre-FY25-POH-Questions-FINAL.pdf)

²⁷ <https://www.congress.gov/bill/119th-congress/house-bill/1>.

²⁸ Most families who have been on TANF longer than 60 months have multiple barriers to work and identifying their hardships is difficult. CITE

²⁹ For example, after Georgia began work requirements, the administrative spending for the demonstration was \$54.2 million out of the \$80.3 million in total demonstration spending in the first 4.5 years, according to data reported by Georgia to CMS. See US Government Accountability Office, Medicaid Demonstrations: Information on Administrative Spending for Georgia Work Requirements, available at: <https://www.gao.gov/products/gao-25-108160>.