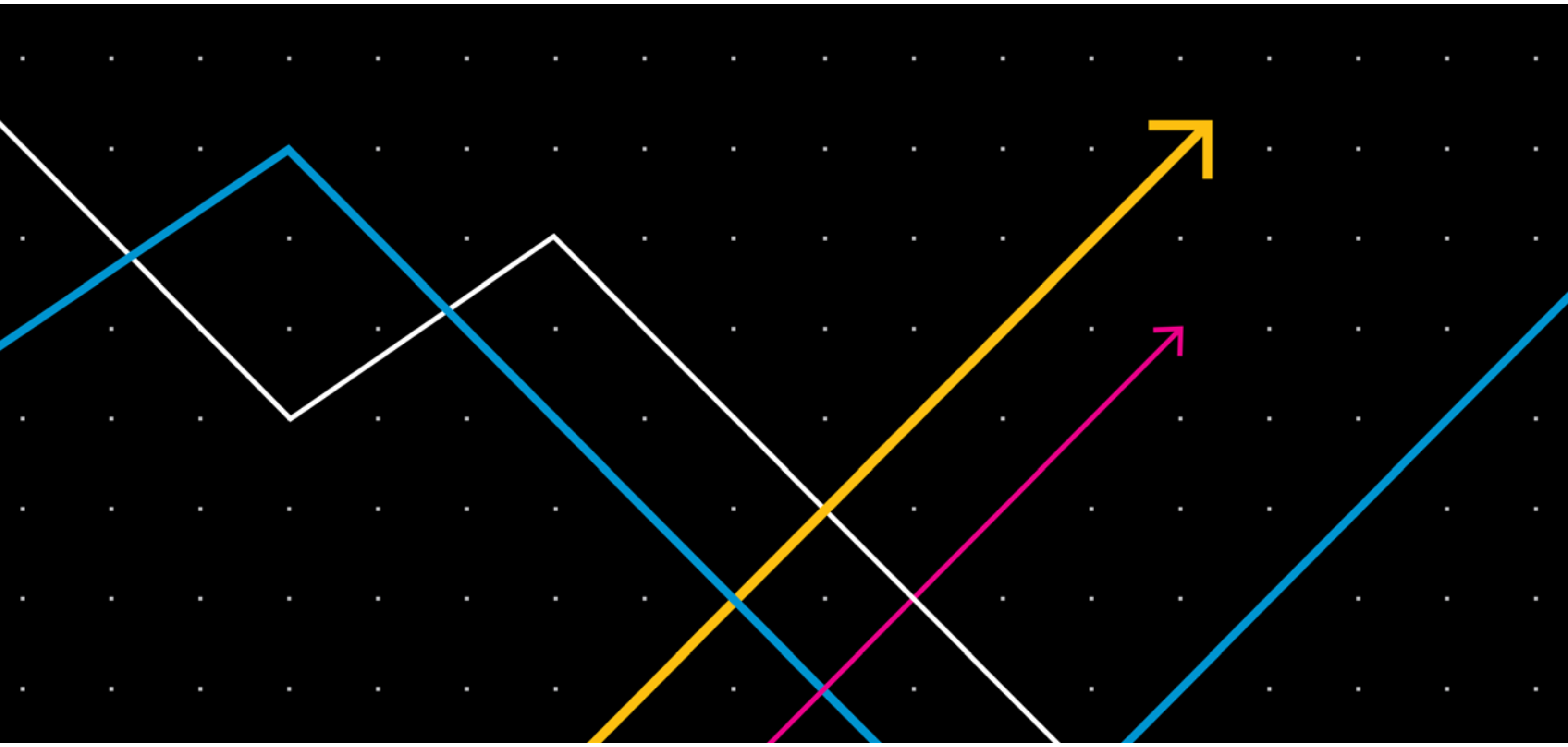

A Descriptive Study of County- versus State-Administered Temporary Assistance for Needy Families Programs

OPRE Report 2015-42

May 2015

A DESCRIPTIVE STUDY OF COUNTY- VERSUS STATE-ADMINISTERED TEMPORARY ASSISTANCE FOR NEEDY FAMILIES PROGRAMS

FINAL REPORT

OPRE Report 2015-42

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Overview

One-half of all families receiving cash assistance from the Temporary Assistance for Needy Families (TANF) program live in states with county-administered TANF programs. But what does "county-administered" mean? States take different approaches to TANF administration, and "county-administered" can mean several different things. States do not report details about how they supervise counties or how counties administer TANF, but these details and how they differ from the details of state-administered TANF programs, have implications for federal policies, regulations, and technical assistance.

To address this knowledge gap, this report closely examines the TANF programs in four states with state-supervised, county-administered systems (California, Colorado, Minnesota, and North Dakota) and provides detailed information on TANF administration in selected counties in these states. The report also identifies differences between county- and state-administered TANF programs and describes the technical assistance needs of county-administered programs. The report draws on in-person interviews with state and county TANF administrators in each of the four states, telephone interviews or survey responses from state TANF administrators in 29 states with state-administered TANF programs, and other data sources.

What do county-administered TANF programs look like? The four county-administered TANF programs examined share three elements that set them apart from state-administered programs: county employees deliver TANF services in county-run local offices; county governments contribute funding for TANF; and county elected officials have a role in reviewing the local TANF budget, policy, or both. Beyond these three broad consistencies, no two county-administered TANF programs look alike. Across the four states, counties have widely different authority over TANF implementation and policy. In states where counties have greater flexibility to shape their TANF programs, a family's TANF experience, such as specific work requirements, training opportunities, services provided to teen parents, can differ depending on the county in which they live. Even in these states, though, basic rules about who is eligible for TANF and how much cash assistance families can receive are applied uniformly across counties in each state.

How do county-administered TANF programs differ from state-administered programs? Beyond the three core elements of county-administration, most practical differences between state- and county-administered programs are a matter of degree. State-administered programs offer a range of authority and flexibility to their local offices, but it is generally much less than offered to county-administered TANF programs. Despite their structural differences, county-administered TANF programs as a group do not differ systematically from state-administered programs in client outcomes, nor are they systemically different in population size, political party, or other state characteristics. Nonetheless, proponents of county-administered programs value the flexibility to adjust to local circumstances, and proponents of state-administered programs highlight the consistent support low-income families receive throughout the state. Whether a state's TANF program is county-administered or state-administered, each state seeks its own balance between providing consistent support for families and adjusting to local circumstances.

Concluding Observations. The extent of county control and the limits on state control are important for federal lawmakers and regulators to recognize. Governors and other state-level officials may not have direct authority to mandate specific actions at the county level. Though states are ultimately responsible for complying with federal laws and regulations and ensuring that their counties do also, the process of implementing federal policies in a state with a county-administered TANF program can be complex. Further, because county administrators in some states are directly implementing federal policies, technical assistance on these matters needs to be directed to county administrators as well as state officials in these states.

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Executive Summary

One-half of all families receiving cash assistance from the Temporary Assistance for Needy Families (TANF) program live in states that have county-administered TANF programs. But no common, precise definition of county administration exists. Since the implementation of TANF in 1997, states have chosen a variety of approaches to administration; consequently, "county-administered" can mean several different things. States do not report in detail to the federal government on how they supervise counties or how counties administer TANF. Nonetheless, the details of how states and counties administer TANF, and how these arrangements differ from state-administered TANF programs, have implications for federal regulations, policies, and technical assistance.

To address this knowledge gap, this report provides detailed information on the TANF programs in four states with state-supervised, county-administered systems (California, Colorado, Minnesota, and North Dakota) and on TANF administration in selected counties in these states. The report also identifies differences between county- and state-administered TANF programs and describes county-administered programs' technical assistance needs. The report draws on data collected during on-site interviews with state and county TANF administrators in each of the four states; telephone interviews or survey responses from state TANF administrators in 29 states with state-administered TANF programs and from state TANF administrators in 2 states with county-administered TANF programs;[1] and secondary data sources.

What Do County-Administered TANF Programs Look Like?

The four county-administered TANF programs examined share three elements that set them apart from state-administered programs: county employees deliver TANF services in county-run local offices; county governments contribute funding for TANF; and county elected officials have a role in reviewing the local TANF budget, policy, or both. Beyond these three broad consistencies, no two county-administered TANF programs look alike. Counties across the four states vary vastly in autonomy and responsibility for TANF implementation and policy. The experiences of families receiving TANF cash assistance differ across both states and counties. Each state has different rules about who is eligible for TANF and how much cash assistance families can receive, but these rules are applied uniformly across counties in each state. Other aspects of a family's TANF experience, however, such as their specific work requirements or training opportunities or what services are provided to teen parents, can differ across counties. Those county-by-county differences are greater in some states with county-administered TANF programs than others because counties in some states have great flexibility to shape their TANF programs, but others' ability is limited.

Colorado counties have the most extensive autonomy and responsibility. Selected county commissioners and community stakeholders play a formal role in approving statewide program rules for the Colorado Department of Human Services (CDHS), and counties have considerable flexibility in designing their TANF programs within those parameters. This flexibility includes designing not only the employment and supportive services but also the approaches for serving teen parents and other fundamental program elements. Colorado counties join with state staff to collectively determine how federal funds are distributed to counties. Counties are responsible for contributing the full amount of the required nonfederal spending; individual counties are responsible for managing these funds to meet all county-level program and administrative costs (except for major information technology [IT] system costs).

In California, the state and counties share considerable authority and responsibility. The state pays most of the costs and establishes statewide eligibility rules, benefit levels, and other program rules, but the counties have significant input into the process. Within statutory and regulatory parameters, California counties have flexibility in designing and administering an array of services that meet local needs.

In stark contrast to Colorado and California, North Dakota offers its counties almost no direct authority to shape policy, determine employment services, or determine the allocation or use of federal and state funds, though the state convenes a workgroup of county eligibility workers to discuss policy changes and revisions. Nonetheless, North Dakota's counties must cover all of their TANF programs' administrative costs with county funds.

Minnesota falls somewhere in the middle. Minnesota counties share financial responsibility for the program's administrative costs equally with the state, and they have authority to decide how to spend their allotment of state and federal funds for emergency cash assistance and employment services, including whether to provide services themselves or contract with employment service providers.

The four study states differ from each other in many other ways, most notably population size, but these differences do not align neatly with differences in approaches to TANF.

How Do County-Administered TANF Programs Differ from State-Administered Programs?

Beyond the three core elements of county-administration—county employees, county financial responsibility, and an oversight role for county elected officials—differences between state- and county-administered programs are mostly a matter of degree. State-administered programs, like county-administered programs, offer a range of authority and flexibility to their local or regional offices, though state-administered TANF programs generally retain considerable authority at the state level and allow much less flexibility locally than county-administered TANF programs. For example, although state-administered programs primarily retain authority for policy development, a few such programs allow local offices or regions some flexibility in implementing those policies.

The structural differences between state- and county-administered TANF programs do not correlate with any quantifiable differences in key program or client outcomes. For example, county-administered TANF programs as a group do not have higher or lower work participation rates than state-administered programs, nor do they systematically serve more or fewer of the population's poor families or offer larger or smaller benefit amounts. In addition, states with county-administered TANF programs are not systemically different from other states in terms of population size, political party, or other state characteristics.

What Are the Technical Assistance Needs of County-Administered TANF Programs?

County-administered TANF programs have a wide range of technical assistance needs, including many they share with state-administered TANF programs and some that are unique. Both state and county TANF administrators already receive federal technical assistance and federally facilitated opportunities for peer learning, for which those interviewed for this study expressed appreciation. County TANF administrators interviewed, however, expressed a need for more direct communication with federal TANF administrators and for technical assistance in implementing federal policies at the county level. Administrators of county TANF programs also strongly emphasized the value of peer learning among counties in a state or among states with county-administered TANF programs. Again, those interviewed expressed appreciation for the opportunities they already received and eagerness for more.

Concluding Observations

Counties in some—but not all—states with county-administered TANF programs have considerable authority and responsibility to develop TANF policies. The extent of county control and, by extension, the limits on state control are important for federal lawmakers and regulators to recognize. Governors and other state-level officials may not have direct authority to mandate specific actions at the county level. Though states ultimately are responsible for complying with federal laws and regulations and ensuring that their counties do also, implementing federal policies in a state with a county-administered TANF program can be complex. Further, because county administrators in some states are directly implementing federal policies, technical assistance on these matters needs to be directed to county administrators as well as state officials in these states.

County flexibility to tailor TANF programs depends not only on the formal structure of state and county authority and responsibility but also on counties' practical ability to act. When counties have fewer financial resources, such as during the recent recession, or if they lack the personnel and technical capacity to develop innovative programs, there are fewer county-by-county differences regardless of their formal authority.

Although county or state TANF administration is not systematically correlated with measured outcomes for families, there are those who highlight the benefits of each. Proponents of state TANF programs highlight the consistent support low-income families receive throughout the state. Proponents of county-administered TANF programs underscore the flexibility to adjust to local circumstances, culture, priorities, and perspectives. As all states continue to implement and revise their TANF programs, whether county-administered or state-administered, they each seek their own balance between providing consistent support for low-income families and adjusting to local circumstances.

Introduction

Half of all families receiving cash assistance from the Temporary Assistance for Needy Families (TANF) program receive assistance through a county-administered TANF program. How counties administer TANF, how states supervise them, and how these arrangements differ from state-administered TANF programs are important considerations for federal regulations, policies, and technical assistance. However, there is no precise definition of county administration and states do not report the details of their administrative arrangements to the federal agency that oversees TANF. This report addresses that knowledge gap by providing detailed information on how TANF is administered in four states (California, Colorado, Minnesota, and North Dakota) and selected counties within these states. The report also identifies differences between county- and state-administered TANF programs and describes county-administered programs' technical assistance needs.

Background

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), which replaced Aid to Families with Dependent Children (AFDC), authorized the TANF block grant. The four purposes of TANF are (1) to provide assistance to needy families so that children can be cared for in their own homes or homes of relatives; (2) to end the dependency of needy parents on government benefits by promoting job preparation, work, and marriage; (3) to prevent and reduce the incidence of out-of-wedlock pregnancies; and (4) to encourage the formation and maintenance of two-parent families. The structure of the block grant gives states considerable flexibility in an array of policy, financing, and operations choices, subject to a handful of federal requirements such as a 60-month time limit on federally funded assistance, work participation requirements, and "maintenance of effort" funding.[2] Among the choices states make about their TANF programs is whether to delegate administration of at least some program elements to localities or counties much in the same way that the federal government transfers administrative responsibility to the states. PRWORA requires each state to "conduct a program, designed to serve all political subdivisions in the State (not necessarily in a uniform manner)" and to submit to federal authorities (the US Department of Health and Human Services, Administration for Children and Families) a state TANF plan describing how they will do so.[3] The state TANF plans typically include general statements about the roles of counties in administering TANF and do not discuss the details of county roles and responsibilities or communication and oversight processes.

Although PRWORA significantly expanded states' role in crafting welfare policy, questions of state versus county control predate TANF. The AFDC program, like other federal-state programs under the Social Security Act of 1935, allowed states to choose between a state-administered system and one that was state supervised but county administered. States had the option to administer AFDC centrally or to pass administrative tasks to other agencies, usually local governments, operating under the supervision of a single state agency. The supervising state agency always retained the ultimate responsibility to federal authorities. Most states developed their plans over several years in the late 1930s and early 1940s. By the end of that period, 32 of 50 states had state-supervised, locally administered structures. During the next 50 years, no other states changed to a decentralized system, but many chose to centralize. By 1990, and continuing to PRWORA's enactment in 1996, only 15 states operated state-supervised, locally administered systems; the remaining 35 had state-administered systems.

Since the implementation of TANF in 1997, states have chosen a variety of approaches to administration, and thus "county-administered" can mean many different things. States make different choices about the level of county fiscal and policy authority and the specific roles of county and state staff. Eight states have consistently reported in their state TANF plans that they have county-administered TANF programs, though the specific state and county roles vary even among these states. They are California, Colorado, Minnesota, New Jersey, New York, North Carolina, North Dakota, and Ohio.

Wisconsin also had a county-administered system until January 2013, but over the years, the state moved from a county-based service delivery structure to one in which private entities contract with the state to administer all aspects of TANF in 10 geographical areas. Other states have somewhat hybrid approaches to administration, although their state TANF plans may or may not describe their programs as county administered.

Although only eight states currently describe their TANF programs as county-administered, one-half (50.3 percent) of the national TANF caseload resides in these states. California alone accounts for one-third of the national TANF caseload and two-thirds of the total TANF cases in states with county-administered TANF programs.

Research Design and Methods

With the ultimate goal of improving TANF performance, the study addresses three key research questions:

1. What do county-administered TANF programs look like?
2. How do county-administered TANF programs differ from state-administered programs in program implementation, operations, outputs, and outcomes?
3. Do county-administered TANF programs have unique technical assistance needs?

To address the questions, the study team conducted site visits in four states with county-administered TANF programs, conducted phone interviews or collected surveys from 29 states with state-administered TANF programs and two additional states with county-administered TANF programs, and analyzed secondary data. The three research questions were deliberately broad to allow for a full exploration of the diversity the study team expected to find in county-administered TANF programs as well as to accommodate the broad range of topics included in the conceptual framework. Each of the research questions encompasses specific aspects of program context, implementation, operations, outputs, and outcomes.

Site Visits

The research team conducted site visits in three counties in California and two counties each in Colorado, North Dakota, and Minnesota. Site visits included interviews with state TANF directors, state human services directors, county TANF directors, county commissioners, associations of county human services directors, and others as relevant to the state.[4]

The research team, in consultation with the Administration for Children and Families (ACF), selected states that were diverse in the sizes and characteristics of their TANF caseloads, forms of county governance, geography, and other characteristics. Together, these four states include 70 percent of all TANF cases in county-administered programs. The four states span a range of financial, caseload, and program characteristics (table 1).[5]

TABLE 1

Characteristics of County-Administered TANF Programs

	Name of TANF in state	Average monthly caseload FY 2013	Total spending FY 2013 ($)	Work participation rate (all families, nonadjusted) FY 2011 (%)	Maximum income for initial eligibility for a family of three July 2013 ($)	Number of counties
California	California Work Opportunity and Responsibility to Kids (CalWORKs)	563,785	7.032 billion	27.8	1,289	58
Colorado	Colorado Works	15,124	315.7 million	32.1	421	64
Minnesota	Minnesota Family Investment Program (MFIP)	21,435	437.0 million	32.6	1,105	87
North Dakota	TANF	1,446	33.9 million	67.6	1,169	53

Source: Huber, Erika, David Kassabian, and Elissa Cohen, "The Welfare Rules Databook: State Policy as of July 2013," The Urban Institute, (2014); US Department of Health and Human Services, Administration for Children and Families, Office of Family Assistance, TANF caseload and financial data, FY 2013; and Office of Family Assistance, table 1B, "Work Participation Rates – Fiscal Year 2011."

Note: FY = fiscal year. TANF = Temporary Assistance for Needy Families. Maximum monthly income for initial eligibility across the continental United States ranges from $269 in Alabama to $1,526 in Nevada. The average for the continental United States (excluding Wisconsin) is $771.

California

TANF in the state is called the California Work Opportunity and Responsibility to Kids program (CalWORKs), and the work component of TANF is called Welfare-to-Work. The state implements a 48-month lifetime limit on assistance, after which point the needs of the adult in the family (also called a unit) are excluded in calculating benefits.[6] Also as of July 2013, the maximum monthly benefit for a family of three with no income was $638.[7] For single parents who do not comply with work requirements without good cause, California's most severe sanction is to lower the family's grant by the amount of the adult's portion of the benefit, approximately $120. If the parent takes appropriate action to comply with the work requirements, the full grant is restored. Table 2 presents additional client characteristics of the state caseload.

TABLE 2

Select Client Characteristics, California

Caseload composition, FY 2013	
No adult	46.5%
One-parent	44.2%
Two-parent	9.3%
Race/ethnicity, FY 2011	
Hispanic	55.1%
African American	18.9%
White	18.0%
Other or unknown	7.9%
Percentage with earned income	12.2%
Percentage receiving SNAP	89.5%
Average monthly benefit	$499.50

Sources: US Department of Health and Human Services, Administration for Children and Families, Office of Family Assistance, Appendix to the Temporary Assistance for Needy Families (TANF) Program's Tenth Annual Report to Congress, (2013); and Office of Family Assistance caseload data, 2013.
Note: FY = fiscal year; SNAP = Supplemental Nutrition Assistance Program.

Colorado

The state calls its TANF program Colorado Works. Receipt is capped at a 60-month lifetime limit that applies to the entire unit. The maximum monthly benefit for a family of three with no current income was $462 as of July 2013. The most severe sanction for noncompliance with work requirements is suspension of the entire family's benefit for three months or until the individual is back in compliance, whichever is longer. Table 3 presents additional client characteristics of the state caseload.

TABLE 3

Selected Client Characteristics, Colorado

Caseload composition, FY 2013	
No adult	32.2%
One-parent	60.4%
Two-parent	7.5%
Race/ethnicity, FY 2011	
Hispanic	33.3%
African American	11.8%
White	51.7%
Other or unknown	3.3%
Percentage with earned income	2.8%
Percentage receiving SNAP	62.2%
Average monthly benefit	$366.70

Sources: US Department of Health and Human Services, Administration for Children and Families, Office of Family Assistance, *Appendix to the Temporary Assistance for Needy Families (TANF) Program's Tenth Annual Report to Congress,* (2013); and Office of Family Assistance caseload data, 2013.
Note: FY = fiscal year; SNAP = Supplemental Nutrition Assistance Program.

Minnesota

TANF in the state is called the Minnesota Family Investment Program (MFIP). The lifetime limit for assistance is 60 months and applies to the entire unit. The maximum monthly benefit for a family of three with no current income was $532 as of July 2013. The most severe sanction for noncompliance with work requirements is case closure[8] for the entire family for at least one month or until the individual is back in compliance. Table 4 presents additional client characteristics of the state caseload.

TABLE 4

Selected Client Characteristics, Minnesota

Caseload composition, FY 2013	
No adult	50.0%
One-parent	50.0%
Two-parent	0.0%
Race/ethnicity, FY 2011	
Hispanic	13.3%
African American	34.7%
White	30.9%
Other or unknown	21.0%
Percentage with earned income	16.8%
Percentage receiving SNAP	99.6%
Average monthly benefit	$343.20

Sources: US Department of Health and Human Services, Administration for Children and Families, Office of Family Assistance, *Appendix to the Temporary Assistance for Needy Families (TANF) Program's Tenth Annual Report to Congress,* (2013); and Office of Family Assistance caseload data, 2013.
Note: FY = fiscal year; SNAP = Supplemental Nutrition Assistance Program.

North Dakota

The program in North Dakota is simply called TANF. The state imposes a 60-month lifetime limit for assistance that applies to the entire unit. The maximum monthly benefit for a family of three with no current income was $477 as of July 2013. The most severe sanction for noncompliance with work requirements is case closure for the entire unit until compliance. Table 5 presents additional client characteristics of the state caseload.

TABLE 5

Selected Client Characteristics, North Dakota

Caseload composition, FY 2013	
No adult	45.9%
One-parent	54.1%
Two-parent	0.0%
Race/ethnicity, FY 2011	
Hispanic	3.3%
African American	5.7%
White	27.9%
Other or unknown	63.1%
Percentage with earned income	21.4%
Percentage receiving SNAP	86.2%
Average monthly benefit	$313.80

Sources: US Department of Health and Human Services, Administration for Children and Families, Office of Family Assistance, *Appendix to the Temporary Assistance for Needy Families (TANF) Program's Tenth Annual Report to Congress,* (2013); and Office of Family Assistance caseload data, 2013.
Note: FY = fiscal year; SNAP = Supplemental Nutrition Assistance Program.

After selecting the states to include in the study, the research team, in consultation with ACF, selected two to three counties to visit in each state. The counties varied in size of the population served, with one county being among each state's most populous (marked with * in the list below) and another of moderate or small size. The counties included a range of TANF program approaches and caseload characteristics.

The study team visited the following counties:

- Los Angeles County, California*
- Placer County, California

- Stanislaus County, California
- El Paso County, Colorado*
- Fremont County, Colorado
- Chippewa County, Minnesota
- Hennepin County, Minnesota*
- Burleigh County, North Dakota*
- Rolette County, North Dakota

Phone Interviews

To gather information about state-administered TANF programs, the research team conducted targeted phone interviews with a large sample of state TANF directors of state-administered programs. The sample included the 26 states with the largest TANF caseloads and three states neighboring North Dakota with relatively small TANF caseloads (appendix A). Each call lasted approximately 40 minutes and used a structured interview guide. A few states chose to enter responses directly into a survey form that was substantively identical to the interview questions. The state-administered TANF programs that provided information account for 82 percent of all TANF cases in state-administered programs.

The study team also reached out to each of the four states with county-administered TANF programs that had not been included in the site visits to offer the opportunity to contribute in the form of similarly structured interviews. Two states, New Jersey and North Carolina, provided information. Together, the caseloads of New Jersey and North Carolina account for 7 percent of the total cases in county-administered TANF programs.

Analyses of Secondary Data

To more fully explore differences between county-administered and state-administered TANF programs, the study team conducted limited quantitative analyses of secondary data on state characteristics, program characteristics, and program outcomes for all 50 states and the District of Columbia. The state data included the following:

- State characteristics
  - Population
  - Population density
  - Unemployment rate
  - Poverty rate
  - Share of poor families receiving TANF
  - Number of counties
  - Political parties of governor, House majority, Senate majority
- State TANF program characteristics
  - Work participation rates
  - Number of years meeting work participation rate
  - Maximum benefit levels
  - Maximum income for initial eligibility
  - State TANF time limits
  - Worst-case sanction
- State TANF caseload characteristics
  - Race/ethnicity
  - Percent with earned income
  - Average monthly benefits
  - Average earned income
  - Percentage with sanctions
  - Percentage receiving TANF for more than 60 months

The study team also reviewed state TANF plans and other relevant documents and data for each of the four states visited.

What Do County-Administered TANF Programs Look Like?

No two county-administered TANF programs look alike. Each of the study states engages its counties in some aspects of program financial management and decisionmaking around administrative processes, including how to structure processes for accepting applications and managing active TANF cases. However, across the study states, counties have vastly different degrees of autonomy in and responsibility for these aspects of TANF and for policy development. This section describes in detail the TANF programs in the four states selected for site visits. Summary information from two additional states with county-administered TANF programs, New Jersey and North Carolina, is included at the end of the section.

Across the study states, Colorado counties have the most autonomy and responsibility in administering the state's TANF program. Selected Colorado counties and community organizations serving low-income populations play a formal role in approving statewide program eligibility rules, benefit levels, and other parameters, and counties have considerable flexibility in designing county TANF programs within those parameters. Colorado counties collectively, in conjunction with state staff, are responsible for determining how federal funds are distributed to counties. County governments are responsible for contributing the full amount of the required nonfederal spending and managing these funds to meet all county-level program and administrative costs, except for major IT system costs.

In California, the state and counties share considerable authority and responsibility for TANF administration. The state pays most of the costs and establishes statewide eligibility rules, benefit levels, and other program rules, but the counties have significant input into the process. Within statutory and regulatory parameters, California counties have flexibility in designing and administering an array of services that meet local needs.

In stark contrast to Colorado and California, North Dakota offers its counties almost no authority to shape policy, determine employment services, or determine the allocation or use of federal and state funds. Nonetheless, North Dakota's counties have a sizable financial responsibility: counties cover all administrative costs of the county program.

Minnesota falls somewhere in the middle. Minnesota counties are financially responsible for one-half of the program's administrative costs; funding from the state makes up the balance. Minnesota counties also have authority to decide how to spend their allotment of state and federal funds for emergency services and whether to provide services themselves or contract with employment service providers.

As a result of the greater county flexibility in Colorado, California, and to some extent Minnesota, clients in different counties in those states will have more varied experiences and opportunities than clients in different North Dakota counties. However, on the whole, a family's TANF experience is shaped more by the state in which they live than by their county because each state has uniform eligibility rules and benefit levels.

Each state with a county-administered TANF program has a unique approach to sharing responsibilities between the state and counties in terms of the bureaucratic structure, responsibility for contributing financially, authority for financial decisions, authority for making policy decisions, and mechanisms for program oversight. States also make management and implementation choices about county roles in delivering services to clients and accessing information technology. After a brief history of how the study states came to have county-administered TANF programs, this section presents details on each of these state-county relationships and service delivery dimensions.

History of TANF Administrative Structure

Counties have administered TANF in the four study states since each first implemented the TANF program in 1996 or 1997, and all but Colorado administered AFDC at the county level prior to TANF.

In California, counties have been responsible for caring for the vulnerable and needy throughout the state's history, though the state had a more formal role in administering AFDC. With the implementation of TANF, the state maintained responsibility for establishing program eligibility rules, but it delegated substantial discretion to the counties for designing and administering the expanded employment services of TANF. Each county was required to develop its own CalWORKs implementation plan. Since then, details of the state and county responsibilities have changed, but the basic administrative structure continues.

Colorado had a standardized, statewide AFDC program, but counties, which had considerable autonomy in the state generally, were fully involved in developing the initial state TANF plan. Given the diversity of the counties, particularly in their labor markets, the committee developing the state TANF plan recognized that it would be challenging to design a single program for the entire state that would meet the federal employment requirements of TANF. Therefore, the state TANF plan provided extensive autonomy for the counties. As one county official involved in that process said, “It was a new concept for everyone to rewrite your own program. It was kind of a first!” Although the formal roles of the state and the counties in administering TANF have remained consistent, the tenor of their relationship has fluctuated over the years. State and county representatives now describe a particularly positive and collaborative working relationship.

Minnesota has a long tradition of local control that continues today. The specific structure of the state’s TANF program began under AFDC. Minnesota obtained a federal waiver in 1994 to create its MFIP program, which the state adopted as its TANF program in 1997 and launched in 1998. The first change to that earlier structure came three years ago when a group of 14 counties chose to work together and received state permission to administer TANF employment services under the direction of a joint powers board with representatives from each of the 14 counties; 2013 was the first year with a shared contract. In the past, the 14 counties worked cooperatively, but each had its own plan. Now, the 14 counties have permission from the state to submit a single joint plan.

In North Dakota, counties have always administered social services programs. In 1935, the legislative assembly established a county welfare board (together with a public welfare board), and the assembly legislated primary responsibility for providing care for people in need upon county government. According to a county social services board member, “Each county sees it as their prerogative to run their programs.” This relationship has remained relatively unchanged since at least the early 1980s, state administrators said. Before then, local workers, who typically handle cases across all of the state’s public assistance programs and not just AFDC or TANF, had more discretion in making eligibility-related decisions. State administrators pointed to growth in programs such as Medicaid and food stamps coupled with new eligibility rules and concerns about federal regulations as drivers of the changes in the state-local relationship that scaled back some local decisionmaking authority. In recent years, state legislators have filed bills to end county administration of public assistance programs, though these measures have failed.

Table 6 describes the history of TANF administrative structure in the four case study states.

TABLE 6

History of TANF Administrative Structure in the Four Case Study States

	County-administered when?	Changes with or after TANF?	Recent changes?
California	Always	Greater county discretion in work programs under TANF than AFDC	More frequent state rule changes that counties need to implement
Colorado	With TANF	TANF was the first time counties developed their own welfare programs	Positive changes to state-county relationship (communication; collaboration)
Minnesota	Always	MFIP began with a waiver; became foundation for TANF	14 counties jointly administer employment services
North Dakota	Always	No changes to administrative structure	No

Source: Urban Institute and ICF analyses.

Bureaucratic Responsibilities

In every state, administering TANF is a multifaceted endeavor involving a host of actors with varying degrees of authority and responsibility. State actors include the legislature, the governor, and executive branch agencies. Within the state human services agency, one person serves as the official TANF director, though that person may have responsibility for other programs as well, and other people also have important roles related to TANF. In states with county-administered TANF programs, actors include a county TANF director, who also might have responsibility for programs other than TANF and who might have staff to assist with various aspects of TANF administration. The county TANF director is usually hired by the county board of commissioners (or "board of supervisors" depending on the county's nomenclature), a body of elected officials who have oversight responsibility for the county. In addition, most states have an association of county social service directors, although the membership of the organization and the formality of its role vary by state. County employees staff the county social service offices that administer TANF. Beyond this consistent set of actors, in some states TANF administration also involves other state or county committees and decisionmaking bodies. In some states, unions may play an important part in negotiating the details of how TANF services are delivered to clients.

Together, these actors develop and implement TANF legislation, rules, and policies; ensure the smooth and accountable flow of federal, state, and county TANF dollars; and ensure compliance with federal, state, and county requirements. The entity that has decisionmaking authority for a particular aspect of TANF administration may or may not have a financial responsibility as well. In each of the states, there are some differences in the roles and responsibilities related to determining eligibility and providing TANF cash assistance, as compared with those related to developing and providing TANF employment-related services. For example, county employees might handle eligibility determination and case management while contractors provide employment-related services. Among the four county-administered TANF programs included in this study, each state's specific approach to TANF administration is unique, as described in the following sections.

State and County Roles

CALIFORNIA

The state law creating CalWORKs made a distinction between rules governing who is eligible for TANF and rules about the services families would receive. The state maintains statewide eligibility standards and grant levels but delegates substantial discretion to counties for service decisions. For example, the state may require that counties provide orientation to clients and assist them in a job search, but the counties develop their own specific orientation curriculum and job search programs. The state has no direct authority over the county welfare directors, who are hired by and accountable to the county boards of supervisors. However, the state does maintain the ability to take severe measures, such as halting a county's TANF funding, in the unlikely scenario of gross county mismanagement of the program. TANF actions are governed by state statute, regulations, and state-issued "All County Letters," which essentially have the force of regulations. The state requires counties to submit CalWORKs plans that broadly define the TANF program choices they have made within the state regulatory framework. In this state-supervised, county-administered system, the state interprets federal law, regulates, oversees performance, and manages the accounting and control required to comply with state and federal fiscal control agencies. Counties lease buildings, hire staff, procure computers and automated eligibility systems, receive state and federal money, contribute their own money, administer benefits and services, report to the state, and are subject to audits.

COLORADO

Similar to California, Colorado has consistent statewide TANF eligibility rules and benefit amounts and a statewide framework for Colorado Works included in the state TANF Plan. Within that framework, counties develop and implement individual policies that are approved by county boards of commissioners and certified by the state as compliant with state rules. However, in contrast to the other study states, the State Board of Human Services must approve Colorado's statewide TANF rules, within the limits of state and federal law.[9] The board is composed of governor-appointed county commissioners and community stakeholders, such as representatives from Boys & Girls Clubs and United Way. CDHS may, however, initiate rule changes. In addition, a committee of county commissioners and state staff, the Works Allocation Committee, determines the formula for allocating federal TANF funds to counties. Each county human services director is hired by and accountable to the county board of commissioners. The state and county roles regarding TANF are included in a memorandum of understanding between the state and a county. Generally, each memorandum of understanding is identical except for the county name. The state provides monitoring and oversight to ensure compliance with state and federal laws and provides training to the counties.

MINNESOTA

In Minnesota, state statutes outline most of the bureaucratic relationships and TANF policies. As in California and Colorado, Minnesota has statewide TANF eligibility rules and benefit amounts and allows counties greater discretion in providing employment and training services. The state Department of Human Services is responsible for administering TANF policy, making recommendations to the governor and legislature regarding the implementation of TANF, and ensuring the quality and integrity of MFIP implementation throughout the state. Although the state seeks input from the counties to develop policies and legislation, it ultimately sets the policy. Within the limits of state law and policy, counties can choose whether to provide services directly or through contracts, how to administer state policies, and which performance standards to include in any contracts. Counties submit biennial plans to the state indicating how they intend to use funds allocated to them for providing employment and training services and for the state share of eligibility worker salaries, as well as whether they plan to use any of the funds for emergency cash assistance (if they do, counties set policies for this assistance). Counties also can seek state permission to collaborate with other counties to develop regional performance standards or to comingle funds. As noted, a group of 14 counties has formed this type of collaborative relationship and act as a unit for many TANF program purposes.

NORTH DAKOTA

In North Dakota, counties have the least autonomy of all the study states. For example, the state sets all eligibility and program rules, and counties cannot contract with private or nonprofit groups directly or adjust the programming for TANF services. For eligibility-related functions, counties have discretion only in establishing business processes, staffing levels, and other aspects of administering uniform state TANF policies, although counties do have autonomy in assessing clients' needs and making referrals to outside groups, state administrators said. County employees staff the county social service offices. For employment-related services, the state contracts directly with three service providers who each cover part of the state. Both counties and employment service contractors interact independently with the state through its TANF program administrator and regional representatives who also provide technical assistance and training. The state seeks input from counties and employment service contractors on some policies and administrative guidelines, but it does not allow flexibility within the established policies and guidelines.

ROLES OF COUNTY ELECTED OFFICIALS

The roles of the county elected officials are similar in each of the four study states. As oversight bodies responsible for protecting the counties' legal and financial responsibilities, the county commissioners and county boards of supervisors hire the county TANF directors and approve the counties' TANF budgets and contracts. Whether county boards also must approve county-level changes to TANF policy varies by state and county. For example, California boards mainly approve only the initial county plans, not the annual updates; boards in Minnesota and Colorado, as well as in some counties in California, must approve all county-level policy changes. The state sets all TANF policies in North Dakota.

For the most part, elected officials rely on their appointed TANF directors to handle day-to-day decisions. However, some issues require board input. In the counties visited for this study, TANF directors typically keep the board informed, at least through annual reports, about the status of the program and the director's decisions. For example, when the Los Angeles County Department of Public Social Services decided to assign dedicated case managers to homeless clients, they "did not go to the board for an overt policy decision," said a county administrator, "but consulted with the board's representatives, [and] called deputies who were heavily involved in the decision." In some communities, advocates for low-income families also bring issues to elected officials' attention.

Although boards are not generally involved in day-to-day decisions, their level of involvement can vary depending on the county. According to those interviewed in Colorado, commissioners in some counties are very involved in Colorado Works and even sign off on decisions about whether to grant diversions to individual families. North Dakota county commissions appoint social services boards that meet monthly with county social services departments and handle the midlevel decisions, such as whether to hire additional staff. The county commissions in North Dakota are the ultimate approval authority and handle major decisions themselves, while the county TANF program administrators handle day-to-day administration of the program.

Unique to Colorado among the study states, county commissioners play major roles in promulgating statewide rules and determining the allocation of federal TANF funds to the counties.

Elected officials vary in their backgrounds and professions and hold diverse perspectives and attitudes about low-income families and social services in general, according to several TANF directors and elected officials interviewed. They often have limited knowledge of social policy or social service implementation issues. TANF issues are a small part of the overall issues county elected officials face. As one elected official in Colorado explained, “You have to understand, commissioners aren’t always prioritizing TANF with roads and bridges and fires and floods. It is not a major focus. We don’t micromanage the department, but we keep accountability through the budget process. Our finance department makes sure things are operating smoothly and we are meeting regulations from the state.”

ROLES OF ASSOCIATIONS OF COUNTY SOCIAL SERVICE DIRECTORS

Associations of county administrators play a role in the administration of TANF in each of the study states. The County Welfare Directors Association of California (CWDA) has the most extensive role of any of the associations in the study states. The CWDA is a nonprofit association representing human service directors from each of California's 58 counties.[10] It serves as a two-way conduit between the state and counties, helping the state to stay abreast of what is happening in the counties. It also analyzes county-level data for the state and helps counties understand state rules. Because county TANF directors in California do not directly report to the state TANF director, the state does not have easy access to data or other information on TANF service delivery beyond that collected in its regular fiscal and program reporting. When the state is considering a change in regulations or enacts legislation, the CWDA advises and provides assistance to agency or legislative staff, such as talking through the implications and providing data analysis and surveys. The CWDA facilitates dialogue between the state and the counties both formally and informally. The CWDA also hosts and facilitates meetings among stakeholder groups, forums, and committees, as well “nearly daily informal discussions” with state and county entities about funding, programming, and all other aspects of TANF implementation, according to CWDA representatives. Although the CWDA is a membership organization representing county TANF directors, professional staff overseen by a paid executive director conduct most of the CWDA work. The heads of the county social service departments serve as the board of directors for the CWDA.

The Colorado Human Services Directors Association (CHSDA), like CWDA, is a nonprofit association representing the human services directors from each of Colorado’s 64 counties. However, CHSDA is primarily an association of county TANF directors and has just two staff members (a policy analyst and a coordinator). An individual county TANF director serves as the president of CHSDA.

CHSDA works under the authority and direction of the county commissioners and their formal association, Colorado Counties, Inc. CHSDA provides a collective voice for county directors to share their perspectives and recommendations with the state legislature and state agencies, and it facilitates information sharing among the counties. For example, as counties develop innovative programs, they share information through CHSDA on how other counties can develop similar programs. However, budget limitations within counties reportedly have reduced such innovative programs.

The Minnesota Association of County Social Service Administrators (MACSSA) plays a large role as a workgroup and advisory group to the state. The group formed in 1946, and its 135 county public service directors and staff members represent all 87 Minnesota counties. Members of the MACSSA Self-Sufficiency Committee meet monthly with state officials to discuss MACSSA and state ideas and concerns. MACSSA employs an executive director, a lobbyist, and a small staff, who are managed by an executive committee of members. According to an active member of the association, the state uses the committee to float ideas or receive input. The state formally requests MACSSA representation on various committees and workgroups. MACSSA committee appointees, in turn, report back to the association. The self-sufficiency committee is one of several program-focused committees within the broader state association. Members of the committee are considered content experts in all income support program areas. The group is composed of county directors and senior-level managers who have responsibility for eligibility and case management in most financial programs in the county. Separate committees focus on child support and health care. Committees' focus has shifted in different directions over the years with administrative and policy changes, an association leadership representative said.

The North Dakota Association of Counties is an umbrella organization, authorized by state law, that represents not only county social service directors but also county prosecutors, clerks, sheriffs, and other county officials. The primary role of the association is to unite the groups in a common legislative agenda and to advocate for the counties. However, the association also has a fiduciary responsibility. It also provides insurance, IT support, and other programs or services for the counties. For example, some smaller counties without IT departments rely on association-provided IT services for a fee, such as setting up employees' work stations or maintaining local computer networks. However, the association has no direct responsibility for TANF or role in TANF administration, state administrators said. The association is led by an executive director who answers to a board of directors consisting of 25 county officials.

ROLES OF UNIONS

In California, labor unions also play a role in TANF administration because most of the frontline staff are union members. State and county officials interviewed in California generally characterized their relationship with the unions as positive and collaborative. For example, TANF administrators in Stanislaus County said they often confer with union officials about potential changes to ensure they have union support. In one case, for instance, before opening a call center that would be staffed on Saturday mornings, Stanislaus County TANF administrators consulted with the union. In Los Angeles County, unions and county administrators have worked in partnership to advocate for state resources and make county-level decisions about allocating funds. Although the same union represents most eligibility workers, according to a Los Angeles County official, there is substantial local variation among the union contracts. In Minnesota, some county eligibility workers are union members, as are employment services workers in some sites. Colorado and North Dakota do not have unionized TANF workers. Union officials were not interviewed as part of this study.

Financial Management and Fiscal Reporting

TANF programs nationally are funded through a combination of federal and state (or local) funds. Each state receives an annual TANF block grant, the amount of which has remained constant since 1997. As a condition of receiving federal funds, each state is required to maintain a certain percentage of its historical spending on welfare programs, known as state "maintenance of effort" (MOE). States may use federal TANF and state MOE funds for any of the four purposes of TANF, which are (1) to provide assistance to needy families so that children can be cared for in their own homes or homes of relatives; (2) to end the dependency of needy parents on government benefits by promoting job preparation, work, and marriage; (3) to prevent and reduce the incidence of out-of-wedlock pregnancies; and (4) to encourage the formation and maintenance of two-parent families.

States with county-administered TANF programs have developed their own approaches to incorporating counties into financial contributions and funding decisions. In California, the state's general funds cover nearly all of the program costs, while Colorado dedicates no state general funds to the TANF program. In Minnesota and North Dakota, the state covers the cost of benefits to individual families and other major costs, but the counties are responsible for at least one-half of the administrative costs of the program. In North Dakota, counties pay all of the administrative costs for TANF, but the state covers all benefit expenditures.

Counties have varying authority over how TANF funds are spent. Colorado counties have the most autonomy (and responsibility) for spending their federal and county funds, with individual counties making their own decisions about spending on cash assistance, program administration, supportive services for TANF clients, and even on whether and how to use funds for preventing out-of-wedlock pregnancies and encouraging two-parent families. In both California and Minnesota, counties make decisions about funding additional supports and services beyond those the state requires, and at least some aspects of program administration, though there are significant differences in the level of authority between the states. North Dakota counties have no authority over how TANF or state funds are spent; even administrative costs are based on estimates of administrative time dedicated to TANF, not proactive county decisions.

State and county TANF budgets have been squeezed in recent years. The block grant has declined in real value as a result of inflation, and the recession increased demand for services while reducing state and county general funds. In addition, changes to federal TANF law as a result of the Deficit Reduction Act of 1995 created financial pressures. The American Recovery and Reinvestment Act of 2009 buffered some of the financial pressures introduced by the recession by providing the temporary Emergency Contingency Fund to support TANF expenses related to increased caseloads, short-term nonrecurring benefits, and subsidized employment. Those funds were available only through the end of fiscal year 2010. Counties in each of the study states except North Dakota reported that as a result of constrained funding, they cut TANF-related supportive services or employment services, limited program innovations, or reduced funding for TANF purposes other than cash assistance.

Table 7 provides an overview of TANF financial management in the four study states. The remainder of this section describes those arrangements in detail.

TABLE 7

Overview of TANF Financial Management in the Four Case Study States

	Funding sources	County funding obligation	Who pays MOE?	Who determines allocations among counties?	County spending authority
California	Federal, state, county	2.5% of basic cash assistance; fixed MOE share	State and county	Counties recommend; state decides	Administration, support services
Colorado	Federal, county	Full fixed MOE	County	Counties recommend; legislature decides	Cash assistance, administration, support services
Minnesota	Federal, state, county	50% of administration costs	State	State	Support services, including administration of support services
North Dakota	Federal, state, county	Administration costs	State	State	None

Source: Urban Institute and ICF analyses.
Note: MOE = maintenance of effort.

California

CalWORKs is funded through a combination of the federal TANF block grant, state general funds, and county funds. The state legislature, with input from the governor and the California Department of Finance, decides how the federal TANF block grant will be appropriated and how much of the state general fund to budget for CalWORKs. Costs for basic cash assistance are handled differently from the rest of the CalWORKs costs. Counties must contribute 2.5 percent of basic cash assistance costs and a fixed MOE amount. To cover nearly all other aspects of CalWORKs, counties receive an allocation of the combined federal and state funds. With these funds, the counties pay for both administrative and program costs, including hiring workers, leasing buildings, providing or contracting for employment and support services, and other elements. The counties are not responsible for IT costs related to CalWORKs.

After the state legislature proposes and the governor approves a negotiated budget for specific categories of CalWORKs expenditures, counties play a substantial role in determining how the total funds are distributed among the counties and how the funds are spent. The CWDA helps counties and the California Department of Social Services arrive at a consensus on an allocation formula for distributing the budgeted amount among the counties. According to a California state official, the counties "definitely collaborate to redistribute resources the most effectively. If [one] county realizes it's going to be underspending and [another] county realizes it's overspending, they'll try to work that out [in advance]. [The state] will put out a planning allocation but ultimately [the counties] will sit down in a room and the final allocation is really dictated by county choice." Counties may not carry allocations over into the next year.

The distribution formula has evolved with time. Historically, the distribution was based primarily on county caseload and prior spending, but recently has included consideration of actual costs per case. Most of the funding allocated to counties is part of the "CalWORKs single allocation," which includes four "suballocations" for eligibility determination, welfare-to-work services, child care subsidies for TANF recipients, and CalLearn.[11] Each suballocation can have a different distribution formula. Although the amounts of the four suballocations are determined separately, the funds are fungible. In addition to the CalWORKs single allocation, the state provides supplemental funding streams, including three new allocations established since 2013 for the state health insurance exchange, family stabilization activities, and a subsidized employment program.

In practice, the counties are reimbursed quarterly for costs up to the full amount of the annual allocation. Likewise, the county MOE contributions are deducted from the allocation rather than sent to the state by the county. Counties may satisfy the MOE requirement through their CalFresh (California's implementation of the Supplemental Nutrition Assistance Program [SNAP]) spending, which most counties do, leaving them with no MOE costs for CalWORKs.

At some point each fiscal year, CWDA helps counties adjust the redistribution if counties are under- or overspending their initial allocations. Because the allocation formula includes historical spending that may no longer reflect current conditions, some counties receive a lower base allocation per case than other counties and may have a greater challenge spending within their allocations. Neither state nor county officials were aware of specific mechanisms for providing additional state funds to assist counties should a natural disaster strike. Los Angeles County representatives recall the county covering the added costs associated with the Northridge earthquake in 1994.

Counties have considerable flexibility in how they spend their single allocation. In Stanislaus County, TANF officials first consider staffing, support, and overhead for running the program. Then they consider how much they will use for direct support services, child care, and contracted services. Contracted services have included a literacy center, vocational training programs, and a "clean and sober" living program. Los Angeles County TANF staff, in contrast, first consider child care costs because CalWORKs regulations require child care subsidies for working TANF recipients. Next they determine spending levels for eligibility services followed by domestic violence prevention, homeless prevention, training, and other supports. After deciding how much to spend on each component, they decide whether to provide the services themselves or contract for the services. The county boards of supervisors must approve the county TANF budgets and contracts and authorize the expenditures. Counties have the option to use county general funds to supplement the single TANF allocation. According to a representative of CWDA, it was more common before the recession for counties to do so, often to pay for elective services such as dental care or tattoo removal that may help parents be more successful finding employment but that are outside the realm of basic allowable welfare-to-work activities.

The state retains a portion of the federal TANF block grant to administer CalWORKs. The legislature also appropriates some federal TANF or state MOE for efforts to prevent pregnancies among unmarried mothers and promote two-parent families (TANF purposes 3 and 4). Most notably, the state uses roughly $1 billion per year for college scholarships for low-income individuals, based on evidence that college-bound and college-educated women are less likely to become single mothers. However, the state typically does not retain funds for state-run TANF initiatives. Instead, the state can influence county-level initiatives by providing dedicated funding streams to county TANF programs. For example, since January 2014, a portion of the state and federal TANF funding has been distributed to counties for family stabilization activities, such as augmenting existing efforts to stabilize family housing or address other crises that may prevent families from securing and keeping a job and becoming self-sufficient. The state sets the spending parameters for the funds, and each county develops its own approach. Family stabilization efforts emerged after the state reduced the lifetime limit on TANF in the state from 60 months to 48 months and as new opportunities were established in 2012 to receive a wider array of welfare-to-work services.

Colorado

Colorado Works is funded through a combination of the federal TANF block grant and county funds. No state general funds are dedicated to the TANF program, though the state may choose to count some of its spending on related programs toward the state's MOE requirement. The Colorado state legislature decides how much of the federal TANF block grant will be designated for counties and how much the state will receive. Typically, about 85 percent of the block grant goes to counties and about 15 percent to the state. CDHS is responsible for the state allotment and uses it for TANF services for refugees, a small contingency fund, and to oversee the integrity of the county TANF implementation, including providing electronic reporting systems, training, and technical assistance. During better economic times, the state used some of the federal TANF funds for Statewide Strategic Use Fund grants, which funded innovative community projects responsive to the four federal purposes of TANF.

The federal TANF funds designated for county use are allocated to specific counties on the basis of Works Allocation Committee (WAC) recommendations. WAC is a committee of county commissioners (or their appointed designees) from each of the 64 counties and three state CDHS staff. The committee agrees on a formula for allocating the federal TANF block grant funds among the counties. The CDHS director makes the final decision. The formula can be adjusted each year, but generally includes factors such as TANF caseload, previous spending, poverty rate, penetration rates for food assistance and Medicaid, and the number of families eligible for Medicaid, as well as minimum and maximum allocations per county.

Counties are responsible for all aspects of TANF, including basic cash assistance grants, employment services, staff salaries, facilities, county IT systems, and more. In addition, counties decide whether and how much to spend on preventing births to unmarried women and promoting two-parent families (TANF purposes 3 and 4) and whether and how much to transfer to the Child Care and Development Block Grant or the Social Services Block Grant. Both El Paso and Fremont county-TANF administrators reported transferring TANF funds in the past to child care or activities related to pregnancy prevention and two-parent family promotion, but they have since reduced or eliminated these expenditures because of budget cuts.

Each county is also responsible for contributing a fixed amount of county funds toward the MOE requirement. Although counties know the amount of their federal TANF fund allocation and MOE requirement at the beginning of the year, they must spend county funds to meet the MOE requirement before spending the federal TANF funds. Together, the counties' contributions to MOE fulfill the state's MOE requirement. However, additional state spending on preschool programs, the nurse home-visiting program, refundable state earned income tax credits, and other related programs helps the state exceed its required MOE amount. Counties are also encouraged to identify community partners' activities that could help the state accrue more than the required MOE ("excess MOE").

Counties are allowed to save up to 40 percent of their federal TANF allocation or $100,000, whichever is greater, in reserve. (Until recently, counties could keep unlimited reserves.) Counties may also shift federal TANF funds among themselves to make midyear allocation adjustments. In small counties or counties that have budgeted conservatively, relatively small changes in the caseload or contracts during the year can make a big difference in the budget. A county can "sell" funds to another county, in which case the receiving county also takes responsibility for contributing the MOE funds. On the other hand, a county can "gift" funds to another county, in which case the donating county contributes the full MOE. Gifting of funds is common after natural disasters. Selling funds is common when program circumstances change unexpectedly during the year. For example, if a county's caseload is higher than expected and the county doesn't have enough funds to cover basic cash assistance as well as other priorities, it would seek another county's federal TANF funds, even though the receiving county would also need to increase the amount of its own county funds to meet the MOE requirement. Likewise, a county that either finds itself with more federal TANF funds than it needs or is having difficulty finding the county funds to pay the MOE requirement, will try to "sell" some of its federal TANF funds and transfer responsibility for the MOE contribution to another county to reduce its own county financial burden. WAC must approve all midyear funding shifts between counties and historically has approved all requests. In addition, without formally shifting funds, counties can pool resources to fund joint contracts or joint activities with other counties.

Minnesota

Minnesota's MFIP program is funded with a combination of federal, state, and county funds. The funding mechanisms and responsibilities differ for basic cash assistance costs, administrative costs, and the costs of supportive services. For administrative costs associated with determining program eligibility, counties receive an approximately 50 percent reimbursement from the state on the basis of an electronic sampling of how caseworkers spend their time across different assistance programs (random-moment time studies). For program expenses for employment and supportive services, counties receive a Consolidated Fund allocation from the state. Counties use the Consolidated Fund for employment and training services and staff, emergency cash assistance, staffing expenses for the state's TANF diversion program, and other supportive services such as clothing and transportation. The state caps use of the Consolidated Fund for administration at 7.5 percent of the fund. Counties receive 95 percent of their Consolidated Fund allocations automatically, and they can receive the remaining 5 percent only when they meet specific performance measures; 2.5 percent is tied to the calculated local work participation rate, and 2.5 percent is connected to the Self-Support Index. The Self-Support Index is a retrospective, statistically adjusted alternative performance measure that focuses on select client outcomes. (For more details, see Program Oversight section below.)

Counties must submit biennial plans to the state indicating how they intend to use the Consolidated Fund. Counties have flexibility to decide the type of emergency cash assistance they will provide, how to target the services, and how much to spend. They also decide how much of the fund to contract out for employment services. For example, individual county choices varied widely after a recent cut in the Consolidated Fund, with some counties cutting only employment services and others cutting other aspects of their programs. Counties also have flexibility to provide services to families whose incomes are up to 200 percent of the federal poverty guideline, although few have chosen to do so.

Each of the 14 counties that are working collectively to provide employment services contributes a portion of its Consolidated Fund to a joint contract with a single employment service provider. Consolidating their efforts creates savings to each of the counties because now there is a single invoice and one fiscal agent handles the administration of the contracts.

The state legislature appropriates federal TANF block grant funds, including transfers, to the Social Services Block Grant or Child Care and Development Fund and decides whether to use any TANF funds for purposes 3 and 4. For example, Minnesota has directed significant TANF funds to family planning services, the Family Home Visiting Program, and grants to reduce racial and ethnic disparities in infant mortality rates.[12] In addition, since 2005 the state has set aside state and TANF dollars for an Innovation Fund. Most recently, the state set aside $3 million per year for this purpose. The state typically identifies areas for innovation and seeks proposals from the counties. In the past, Innovation Fund dollars have been targeted for transportation services and for Adult Basic Education services. Counties can apply for an Innovation Grant at any time during the year until the fund is depleted.

In addition to MFIP program expenses, Minnesota uses state MOE funds for subsidized child care, a refundable tax credit for K–12 education expenses, the Minnesota Working Family Credit, Head Start, and noncitizen medical assistance.

North Dakota

North Dakota's TANF program is funded with federal, state, and county funds. Counties are responsible for TANF administrative costs, while the state pays all program costs. To determine TANF administrative costs, the state conducts random-moment time studies. The state provides TANF cash benefits directly to clients, and the state contracts directly with employment service providers. The employment services contractors have a fixed budget and are reimbursed by the state for expenses within the budget. The state also uses a portion of the TANF block grant for emergency services and family preservation supports in the foster care system. The state meets its MOE requirement through spending on child care, child support, and other programs. In counties with Native American reservations, the state is responsible for a percentage of administrative costs based on the size of the tribal population.

When AFDC was transitioning to TANF in North Dakota, the state legislature, in consultation with the counties, enacted a sweeping change to the state-county financial relationship across a broad swath of its public assistance programs. Passed in 1997 and referred to as the “swap” legislation, the state assumed full program costs for nine public assistance programs including cash assistance and the complementary Job Opportunities and Basic Skills program. Also included were the state’s child care, food stamp, and medical assistance programs, among others. Before the swap, a state finance administrator said, counties were responsible for using county money for 15 percent of the nonfederal grant program costs of economic assistance programs such as Medicaid, child care, and AFDC. Those costs, and particularly financing for grant expenditures, were becoming too much to bear and deemed out of local officials’ control, especially for the Medicaid program. In response, the swap legislation transferred budgetary responsibility for 100 percent of the program expenses to the state. In return, the counties assumed responsibility for all administrative costs for the local provision of services instead of just a portion of these costs.[13] One motivator for the financing change was to maximize spending efficiency, a manager with the state association of counties said. Consequently, local offices have begun seeking ways to collaborate and share staff, particularly in rural areas. Thus far, two multicounty units have combined social services offices.

In North Dakota, the state makes all funding decisions beyond local administrative costs, including whether to transfer TANF block grant funds to the Social Services Block Grant or Child Care and Development Fund. Similarly, state officials determine whether to use any TANF money for family planning and promotion of two-parent families. Other than the swap legislation, the only other significant financing change was a shift in child support enforcement responsibility from the counties to the state beginning in the early 2000s, which tangentially affected TANF.

Policy Authority and Development at the State and County Levels

The policy authority of states and counties varies across the four study states. However, one consistent feature is that counties lack the authority to change basic TANF eligibility criteria and benefit amounts, which are uniform throughout each state. This section discusses which policies the state or county makes and the processes for arriving at those policy decisions. It also discusses how policies vary by county. Table 8 summarizes some of the basic aspects of policy development authority in the study states.

TABLE 8

Authority for TANF Policy Development in Four Case Study States

	Eligibility rules	Benefit amounts	Other policies	Contracts for services
California	State	State	County flexibility within state parameters	Counties
Colorado	County representatives approve consistent statewide rules. Counties may expand eligibility in some areas with county funds.	County representatives approve consistent statewide rules. Counties may increase benefits with county funds.	County representatives approve consistent statewide parameters. County flexibility within state parameters.	Counties
Minnesota	State	State	Mostly state. Counties decide whether and how to provide emergency services.	Counties
North Dakota	State	State	State; no county flexibility	State

Source: Urban Institute and ICF analyses.

Statewide Policies

As California developed CalWORKs, a clear consensus emerged that the state should be the entity to establish policies that affect eligibility, the amount of benefits, and due process rights, according to officials interviewed for this study. The California State TANF Plan states that CalWORKs is "administered by county welfare departments in accordance with a statewide system of regulations that ensure universal access as well as consistent and uniform eligibility criteria."[14] Therefore, state statutes and regulations establish the eligibility requirements, earned income disregards, benefit levels, work requirements, sanction procedures, time limits, and family cap policy. For example, counties decide whether and for whom to grant extensions of the state's 24-month time limit, during which clients may participate in a broad range of welfare-to-work activities. (Once clients exhaust the 24 months, they are required to participate in a narrower set of welfare-to-work activities for the remainder of the 48-month lifetime limit on assistance.) The state also imposes additional directives on the county. Typically, the state provides additional funding and mandates that county welfare departments use it for targeted purposes. The counties then are required to develop specific policies and procedures for using the funds for those purposes. The most recent example is the family stabilization funds, discussed in the previous section, that counties began receiving in January 2014.

In Colorado, CDHS in collaboration with the county departments develops statewide rules, which must be approved by the Board of Human Services. The board promulgates rules presented by CDHS related to basic eligibility requirements and benefit levels. CDHS outlines broadly how many other aspects of the program are to be administered, and the rules specifically identify where the counties have options. For example, although the state TANF plan establishes a statewide 60-month time limit on benefit receipt and reasons for hardship extensions, counties may define additional hardship reasons in their county TANF policies. Therefore, the time a family can receive TANF cash assistance could vary across counties. According to CDHS administrators, because CDHS has limited authority to mandate how TANF is administered at the county level, it relies on education and promoting awareness among county officials and administrators to influence county TANF programs. For example, although the state TANF plan sets a goal of reducing out-of-wedlock pregnancies, the plan states that it “intends to achieve this goal by providing policy direction to counties,” such as providing counties with information on evidence-based strategies and assisting counties in developing collaborations with local partners.

In Minnesota, the state sets all program policies, including standardized eligibility and benefit policies. Like Colorado, however, Minnesota counties have flexibility in determining time limit exceptions and exemptions, such as the process for determining if a family is eligible for an extension beyond the state time limit. The state legislature determines Minnesota TANF policy, which is approved by the governor.

In North Dakota, the state sets all policies and program requirements through a combination of changes to state law and administrative rules. The North Dakota General Assembly enacts all changes to the Century Code (the collection of all North Dakota statutes), and the Department of Human Services drafts administrative rules, which are more in-depth and detailed than the state statutes. The state must approve all exceptions and exemptions. According to the North Dakota county representatives interviewed, the state actively seeks county comments on proposed changes. The state TANF program administrator seeks county input through a TANF work group that meets at least annually.

County Policies

The state of California dictates which TANF services the counties must provide. However, the counties have autonomy to decide how to provide those services. A state official explained the state essentially says, “Here’s the outer boundaries. We are looking for reasonable participant results and looking for documentation of participation that meets federal standards.” County perspectives and economies drive variation across counties in employment services options. Counties can choose how to organize a subsidized employment program, the eligibility criteria for the lump-sum diversion program, the structure of mental health treatment, and the extent of English as a Second Language programs or substance abuse services, for example. Likewise, the counties can choose which work-related activities their TANF clients are allowed to engage in and whether to contract with service providers or provide the services through the county.

Placer County, for example, provides some types of client services through informal partnerships with community-based organizations. They have ongoing agreements with five nonprofit agencies that provide adult education, training, job preparation, internships, and unpaid work experience for participants. Stanislaus County, on the other hand, uses information on clients’ needs gathered from assessments to determine which supportive services to provide. Currently, the county contracts with another county department, the Alliance Worknet, to develop the curriculum for job clubs and to develop job leads for TANF clients. Stanislaus County also does more outreach into rural communities than would be necessary in more urban counties. Los Angeles County has opted to add staff and managers who work specifically with homeless families. Los Angeles County also developed a local program in which specialized workers conduct home visits with families as soon as the families become noncompliant with program rules as a way to preemptively address issues and bring clients back into compliance.

In Colorado, individual counties establish policies within the parameters of the statewide rules. For example, consistent with federal rules, the state requires all work-eligible individuals to participate in work activities, except those with domestic violence waivers or those with children under age 6 for whom child care is unavailable. However, the counties define who is “ready to work,” determine the “good cause” reasons for work activity exemptions, and establish the detailed definitions of “unavailable” child care. Individuals who disagree with county decisions must begin the complaint or dispute process with the county, though appeals of those decisions may be made to the state.

Counties also have the option to use county funds to expand TANF eligibility or increase benefit amounts in the form of cash assistance, lump sum payments, or payments for specific items. However, according to Colorado administrators, counties have not recently done so. The CDHS offers a template that counties can choose to use to help define their individual policies on benefits for teen parents, individual responsibility contracts, sanctions, the period of ineligibility after receiving state diversion funds, time limit extensions, individual development accounts, and other elements.

Although the state offers county TANF directors guidance on establishing policies and the state reviews policies for compliance with state and federal program rules, the county commissioners must approve the policies. Fremont County TANF administrators explained that they hold working sessions with a subset of the commissioners who provide administrators with direction on how to approach policy options. The administrators then bring the proposed policy to a formal board meeting to reach consensus. "Our mission," a Fremont County administrator explained, "is to figure out what people need and how to provide that and how to develop programs around that." The county started with the core policies and has "added policies and programs as things have arisen." For example, in response to several natural disasters in the past few years, Fremont County recently added an enabling resolution to help in cases of natural disaster. El Paso County TANF administrators take "great pride in our staff developing the policies," an administrator said. "We did some innovative things…as far as income disregards and those kinds of things." They sought to have neither too few nor too many policies and consciously avoided having policies "set us up to be something we couldn't live up to." Referring to the range of county approaches to TANF across the state, one state official said, "We have some counties that would give the program back if they could and other counties doing outreach trying to bring people into the program."

Minnesota counties have flexibility to administer MFIP within the limits of state and federal requirements. Counties have flexibility to establish specific procedural policies and to use their judgment in implementing other policies. For example, MFIP clients must begin work activities within 30 days of being determined eligible for MFIP, according to state policy, but counties have the option to require work activities sooner. Although the state sets the "good cause" and sanction policies for enforcing work requirements, county agencies determine whether an individual client's circumstances warrant good cause or a sanction in accordance with the state policy. Likewise, the state has established a 60-month time limit and specified the hardship conditions that may warrant a time limit extension; county agencies determine whether hardship conditions exist on a case-by-case basis. Individuals who are denied services or disagree with county agency decisions may submit a request for a hearing to the county agency or directly to the Appeals and Regulations Division of the Department of Human Services. State human services judges conduct the hearings. Minnesota counties have the most authority in emergency assistance. Counties decide whether to offer emergency assistance to families earning up to 200 percent of the federal poverty guideline and, if so, the amount of TANF and state funds to set aside for this purpose and the basic policies such as who is eligible for how much assistance and under what circumstances.

North Dakota's State TANF Plan establishes detailed TANF policies and does not devolve authority to the counties to establish additional policies. The counties are responsible for hiring staff and administering the program in compliance with the state policies. County administrators interviewed said, "Oversight tends to be tight," and "We follow very strict rules." Nonetheless, the state allows for "special projects" through which human service planning regions may, with state approval, provide TANF benefits and services that are not identical to benefits and services provided elsewhere in North Dakota. A key feature of any special project is closer cooperation among county social services, employment providers, the regional human service centers, and any tribal programs in the region. The special projects are recognition by the North Dakota Department of Human Services that "there are diverse populations within the state and that the various human service planning regions can better meet the needs of the populations within their regions and determine methods to assist recipients in their endeavors to become self-sufficient," a state administrator said. The projects are akin to pilot projects with the overall goal of expanding successful ideas statewide, although the state has not used this arrangement since the mid-2000s, administrators said.

Program Oversight

All states, regardless of their administration type, are required to ensure that their TANF programs comply with federal laws and regulations, to report on TANF spending, and to meet the federal work participation rate requirement. States with county-administered TANF programs must monitor and oversee the county TANF programs to ensure that the state as a whole is in compliance. In addition, states monitor county TANF programs to ensure their compliance with state laws and regulations. States' approaches to monitoring county TANF programs differ depending on the counties' level of autonomy in making financial and policy decisions. At the county level, county supervisors and county commissioners have oversight responsibilities, as discussed earlier. County TANF programs, too, may have additional processes for overseeing TANF administration within the county. This section describes how the state oversees the county TANF programs, how they approach the work participation rate requirement, and any other compliance or performance measures at the state or county level.

California

STATE MONITORING AND OVERSIGHT

In California, the first level of state oversight is review of the county TANF plans. California counties are required to submit annual updates to the plans, including any changes to county TANF policies and county decisions on how to implement new state initiatives. States review plans for compliance with statutes, regulations, and state-issued instruction, as well as alignment with program goals. State fiscal oversight is ongoing, with county and state accounting offices keeping close watch on TANF expenditures. In California, the state uses standardized financial reporting mechanisms to do the accounting and control required to comply with state and federal fiscal control agencies. As a CWDA representative put it, "Fiscally, the state knows what [counties] are doing to the nickel." Tracking TANF caseloads and client activities is more complicated than tracking finances. Unique among the study states, California does not have a single automated eligibility system for the state as a whole. Rather, each county uses one of three systems. Each of the three automated eligibility systems tracks information on client cases and processing, including timeliness. The counties provide the data from their automated systems to the state in a cooperative relationship. Because the three automated systems do not allow for combined tracking of the total state caseload and client participation in activities, counties report to the state monthly using the state's "Welfare to Work 25" form, which provides point-in-time information about where people are in the process, how many are engaged in which activities, how many are sanctioned, and so on. In addition to these oversight mechanisms, the state conducts annual audits of payment accuracy and periodic audits of randomly selected cases.

WORK PARTICIPATION RATE AND OTHER PERFORMANCE MEASURES

California's annual federal work participation rate is calculated using monthly samples of county CalWORKs cases. The state Department of Social Services draws a random sample of cases, and the counties provide demographic and activity information for the selected cases. In conjunction with the sample used to calculate California's statewide federal work participation rate, the state uses an expanded sample to calculate county-specific rates. State law holds counties partially accountable for any federal penalties resulting from a failure to meet the federal work participation rate. To date, California has addressed shortfalls in the work participation rate through corrective action plans and has not received a federal financial penalty. However, if the state were to be penalized financially, counties that contributed to the penalty would pay 50 percent of the penalty unless the county could demonstrate good cause.

Beyond the work participation rate, the state does not require other TANF performance measures. However, the state has developed several other performance metrics to continually monitor the efficacy of the program, such as performance measures for job retention and earnings gains. The state also uses other metrics, such as the rate recipients are sanctioned for noncompliance or are provided an exemption from work requirements, to develop and support the program. Nonetheless, one state official said, "I think the biggest incentive that we've got…is what happens if they succeed, if we get people connected to the labor market, and how well they do. I can't think of a county where that isn't a priority."

Every county reviews several metrics, such as wages, job placement rates, caseloads, work participation, program integrity, overpayments, and fraud. Ultimately, said a representative of the CWDA, county welfare departments "want people to get jobs. How are they getting employment? What kind of employment? Are they coming back?" Many counties have relationships with partners or research organizations; others have in-house analysts who monitor program performance. Each of the California counties included in this study has its own systems for monitoring and improving performance.

Stanislaus County TANF administrators, for example, look first at work participation: "How many of our welfare-to-work clients that are to be enrolled in the program are actually participating? What types of activities are they taking part in? What is our sanction rate? We look at job placements and employment and how many individuals are leaving the program and the reasons why they're leaving the program. Then we look at the [work participation rate] overall." Stanislaus County TANF administrators use reports from their automated systems both for day-to-day management of workload and broader assessments of where additional staff training might be needed. TANF program supervisors also review cases for compliance to supplement the state audit. When the Stanislaus County Community Services Agency contracts with other departments to provide services to TANF clients, those contracts include certain outcome-focused performance measures. For example, contractors are responsible both for the number of clients they serve and for ensuring that 80 percent of the referred clients complete the activity.

Placer County TANF administrators have an internal requirement to meet at least a 50 percent work participation rate, consistent with the federal requirement. Similarly, all counties in the state are expected to process cases within regulatory time frames, but Placer County monitors timeliness to ensure the county also meets its own goal of at least 95 percent timeliness. The county has in-house data analysts, and county case supervisors conduct case reviews that go beyond the state audit. The county also conducts an annual survey of customer satisfaction that is not required by the state.

The Los Angeles County Department of Public Social Services commits to specific performance targets and holds monthly meetings with all the high-level managers in the department to review the department's performance, including the work participation rate and other measures related to CalWORKs eligibility and welfare-to-work performance. The county's work participation rate steering committee develops the measures related to the work participation rate, but other measures go beyond the work participation rate. If the county's performance falls short of its commitments, corrective action is taken and monitored. The county does not hold individual caseworkers responsible for meeting the work participation rate targets. Los Angeles County also evaluated the implementation of its sanction policy out of concern for the large number of people sanctioned. The evaluation involved home visits to every sanctioned family to determine whether the sanction was appropriate. According to one person interviewed, other counties followed the Los Angeles example.

Colorado

STATE MONITORING AND OVERSIGHT

CDHS works collaboratively with counties to improve performance and ensure that programs are implemented within state rules. The state ensures that the state and county implementation of TANF complies with federal and state rules and regulations; the state also provides monitoring and oversight to ensure that the county TANF programs comply with their own individual policies. Every three years, the CDHS conducts management evaluations of the county programs. The state also provides technical assistance and works with targeted groups of counties to understand their needs and ways of approaching the program.

The state monitors all TANF expenditures through the County Financial Management System (CFMS), an automated financial system that is linked to the automated eligibility system and includes many other programs in addition to TANF. Counties have the ability to pull their own reports from CFMS. The state takes several steps to ensure the accuracy of counties' use of CFMS. A financial users group of state and county staff meets regularly to discuss correct TANF-related coding in the system, such as the differences between "assistance" and "nonassistance" expenditures. The state also includes a review of coding accuracy in the state's management evaluation process, and state accountants meet with state TANF administrators monthly.

Colorado tracks TANF eligibility and benefits determination and processing through another automated system, the Colorado Benefits Management System (CBMS), which is also used for other programs such as SNAP and Medicaid. The state closely monitors the accuracy and timeliness of TANF processes, in part because of a court order. The department developed a performance management approach called C-STAT, in which department leaders and key staff review state and county data against specific targets and address any problems in employment entry, timeliness, and accuracy. Not only do state leaders review data reports, but they also send the reports to the counties each week. In addition, the state has a formal case review process, in which it reviews a random sample of individual TANF cases to ensure that frontline staff are collecting the correct data and making timely and accurate determinations.

In addition to formal oversight and monitoring, CDHS has developed a cooperative relationship between the state and counties: the state provides upfront technical assistance and the county TANF administrators are comfortable asking the state for help. A state TANF official explained, "That has really changed monitoring, because we believe in compliance, but there's a respectful way of doing it that moves people in that direction a lot quicker. It's relationships and being responsible for the solution as well." For example, state finance staff conduct "road tours" to county TANF offices to provide technical assistance on program design and to help counties understand their flexibility in spending TANF funds. As a result of this trust, a state TANF official reported, "[counties] are sharing dirty laundry, because they know we can help them fix it, and we're part of the solution—not there to give a slap on the wrist."

WORK PARTICIPATION RATE AND OTHER PERFORMANCE MEASURES

Beyond compliance with federal and state rules and regulations, the work participation rate is the only performance measure for which Colorado counties are held accountable. The work participation rate requirement is included in the memorandum of understanding that each county has with the state. In addition to the threat of penalties for not meeting the work participation rate, counties have a financial incentive to meet it. Unlike any other study state, Colorado has chosen to impose the same MOE requirement on counties that the federal government imposes on the state. County MOE contribution requirements are based on the state maintaining 80 percent of historical spending on welfare-related programs, which is the federally required level for states that do not meet the work participation rate requirement. If counties do meet the work participation rate, they are required to maintain only 75 percent of historical spending levels, consistent with federal rules that apply to states.

Colorado is currently revising the memoranda of understanding with county commissioners to add an opportunity for counties to negotiate an additional outcome based on employment. This would mean counties could choose to measure not only the work participation rate but also GED attainment, certification attainment, completion of domestic violence training or parenting classes, or other activities and indicators of wellness. To improve capacity for measuring such outcomes, the state has augmented its computer system to capture data on activity completion; previously it captured only number of hours. In addition, according to a state official, Colorado's Works Allocation Committee is considering revising the funding allocation formula to reflect county performance. The revision might follow the model of the child welfare program, which recently set aside a percentage of funds to be allocated on the basis of performance and outcomes.

Some counties do their own monitoring and data analysis, but most do the minimum case review and required contract monitoring, according to a representative of the county TANF directors' association. Counties have flexibility to create performance-based contracts when they outsource services. They also are able to create reports from the state automated systems, particularly if they have data analysts on staff. El Paso County TANF administrators said they monitor various aspects of program participation, as well as employment for families diverted from assistance. The county's employment contractor, Goodwill Industries International, tracks employment outcomes and provides that data to the county. Fremont County spot-checks cases for accuracy and to identify areas where additional staff training is needed.

Minnesota

STATE MONITORING AND OVERSIGHT

The state of Minnesota takes overall responsibility for meeting federal TANF law and regulations but also passes those expectations on to the county governments. The state trains county personnel on meeting the federal requirements and oversees the counties, including their program and financial audits, to ensure compliance and to meet federal fiscal reporting and program administrative requirements. A Minnesota Department of Human Services official noted that the department also develops risk assessments for its programs and responds to any identified risks with an audit.

WORK PARTICIPATION RATE AND OTHER PERFORMANCE MEASURES

The state sends the counties monthly reports on their work participation rates. However, county responsibility for meeting the work participation rate is an area of "muddied waters," according to a Minnesota state TANF official. Ultimately, the state is responsible for meeting the federal work participation rate, but there is some uncertainty across the state about whether individual counties are also responsible for meeting the targets. What is clear is that counties have a financial incentive to meet the target. State law requires counties to bear 12 percent of any cut to the TANF block grant that the federal government might impose on Minnesota for failing to meet the work participation rate. Counties can only receive their full allocation of TANF funds if they meet the work participation rate and another performance measure, the Self-Support Index. The Self-Support Index measures how many adults who receive TANF are working 30 hours or more a week at the three-year mark, and how many are no longer receiving cash assistance. Minnesota uses a regression model to calculate an expected range of values for a county's success rate on the Self-Support Index, accounting for variation across counties in economic and demographic characteristics.[15] Though the work participation rate measures processes (the number of TANF recipients engaged in federally defined work activities), the Self-Support Index is intended to measure outcomes. Counties receive 95 percent of their TANF funding allocation initially, and then 2.5 percent only when they meet the work participation rate and 2.5 percent when they meet the Self-Support Index. Effective July 1, 2015, counties will receive their full allocations automatically and will be able to earn an additional 2.5 percent if their performance is in the expected range of the Self-Support Index. Those not landing in that range will be required to institute a two-year performance improvement plan. Continued failure to meet the Self-Support Index ultimately would lead to a loss of 2.5 percent of funding. In 2016, the penalties will disappear, but counties will remain eligible for bonuses for exceeding each county's expected performance for the Self-Support Index.

Over the past few years, a Minnesota steering committee has been developing potential outcome measures for a broad set of essential services for children, the elderly, and people with disabilities; it has also been promoting economic opportunities for adults. The goal is to have a process for managing performance and continuous quality improvement. The potential changes are making their way through the state legislative process.

Minnesota counties can take their own actions to promote best practices and quality assurance and to meet the expectations of their county boards of commissioners. For example, some counties conduct their own staff training or rewrite bulletins more clearly and add county-specific expectations. Hennepin County includes performance metrics in its contracts with service providers. Chippewa County, a member of the 14-county group that has consolidated its employment services, reviews its work participation rate each month and meets with caseworkers to ensure they are accurately coding work activities. The county also holds monthly coordination meetings, which include TANF staff and other public health, social services, and child support enforcement staff, to track individual cases and identify how to create the best opportunity for success for the client.

The 14-county collective is held accountable for the work participation rate and Self-Support Index. Nonetheless, ongoing work participation rates are reported to the individual counties in the region, who compete for the highest rate. Throughout the state, the counties, not the employment contractors, are accountable for meeting the work participation rate, but the workforce center reports on performance to the joint powers board of the 14-county collective. Further, county program managers present quarterly reports to the joint powers board, whose members then share the reports with the boards for their individual counties.

North Dakota

STATE MONITORING AND OVERSIGHT

The state of North Dakota monitors county administration of TANF through reviews of TANF data in the state's computer system and quality reviews on randomly selected cases. The quality reviews examine timeliness and accuracy of benefit determination and other processes. Monthly, the state also assesses whether cases that have exceeded the time limit for cash assistance have been appropriately exempted. If errors are found through any of these oversight processes, the state works with the county TANF program administrator to provide guidance and take corrective action. In addition to this oversight, the state may request additional (voluntary) information from the counties. Likewise, counties may ask the state for data from the state's computer system. According to an interview with a county-level staff member, counties also conduct their own quality reviews when notified by community stakeholders or others inquiring about a particular case.

WORK PARTICIPATION RATE AND OTHER PERFORMANCE MEASURES

Employment contractors, not the individual counties, are accountable for the work participation rate. Contractors may receive a financial bonus if they achieve work participation rates of at least 50 percent. The contract may also be revoked if performance is subpar. The state monitors work participation monthly and shares this information with the contractors quarterly. The state has been working actively with employment contractors in recent years to ensure they are reporting correctly on client activities. If the federal government were to penalize the state for failure to meet the federal work participation rate, the employment contractors, and not the counties, would be penalized.

Service Delivery

Counties in county-administered systems generally have the most local control over service delivery. County TANF administrators or county boards—often with sweeping authority to determine staffing and adopt business processes—enter into contracts with nonprofit organizations or private groups and integrate with other human service programs. These local choices allow for greater responsiveness to county needs, though on rare occasions at the cost of creating programs that may be inconsistent from a client perspective in services offered or quality.

Variation in General Service Delivery Models across Counties

CALIFORNIA

Intake and case management are relatively consistent across counties, but specifics vary by county and by degree of coordination with workforce services, support services, and business processes. As a CWDA representative described the structure, "There is a big continuum of how counties provide these services, but everyone has the same due process. There is a macro flow and within that there is a great deal of county-level decision making."

Intake, Case Management, Employment and Training, and Supportive Services. An application for CalWORKs can be submitted online, but applicants must visit a local office for a face-to-face interview to complete the eligibility determination process. County administrators have authority to determine how workers manage the caseload: they might have a dedicated caseload assigned by client last name, or they may share cases but focus on specific tasks as part of the larger case-management process. Many counties are exploring or adopting this task-based approach to caseload management.

One of the most significant areas of variation, both state and county officials said, is the local decision of how to structure client employment and training services. "The fact that we administer locally," said a CWDA representative, "increases our ability to tailor our program to the most effective [work arrangement] in our local circumstances—the services we offer, the way we deliver, what we do ourselves, what we contract, partnerships we build, and so forth."

Los Angeles County has 24 CalWORKs offices and seven regional employment services (GAIN program) locations. The county operates five of the employment programs and a private provider operates two. Overall, the county handles approximately 175,000 cases comprising 425,000 individual recipients. The county's CalWORKs offices are uniform to a degree, although some are considered "full-service" because they handle multiple program caseloads in the same office, not only CalWORKs cases. "By and large, the basic [process] structure is the same," a county human service manager said. "Do we take this piece of paper and have two people touch it or three people touch it? That would vary by office," the manager said, "but the basics would be the same." All but one of the Los Angeles County welfare-to-work offices are physically separate from the CalWORKs eligibility offices.

Placer County stresses employment services as early as possible in the application process. As a county human services manager said, "Our employment counselors meet with that applicant to discuss and talk up the employment services program, what the benefits of the program are, and get people interested in wanting to seek out the services of the employment services." After a client is approved for benefits, he or she meets with a caseworker to develop an employment plan, including work activities and the number of hours to work, while considering federal work participation rates. The county handles all employment services in-house. Counselors have some flexibility but ultimately must follow state- and federally defined allowable work activities. As one official said, "We can be creative in some ways but also have to stay within the rules." Placer County recently opened an employment services center that combines employment services and eligibility in one location, and some recipients also are able to fulfill the work experience activity there. The county conducts staff training on employment services and intake, and some other counties have sent employees to Placer County to view its operations, such as its automated system by which applicants and recipients are routed through the waiting area, its task-based case management, and its call center. Placer County also has a contract with the University of California, Davis, for specialized training.

Stanislaus County adopted a hybrid case management approach, said a county administrator, when it became apparent to staff that some tasks were slipping through the cracks when the county tried a task-based approach. "One person would do one piece of the puzzle and throw the case over to the next unit, who would do one piece of the puzzle, and we found that if a task wasn't addressed for a specific thing like 'enter customer address here,' it wouldn't get done," the manager said. County administrators suggested that in part, the problem lay in the computer system, which was not as accommodating as it could be to a task-based case management process. County size also affects service delivery decisions, one Stanislaus manager said. Given differing needs in rural and urban areas, such variation is preferable. "Each county is a little different in the population they serve, so it gives us the opportunity to maybe set up our program a little bit different so we can work with the customers we have," the manager said.

Contracts with Service Providers. Counties retain the authority to contract for services, although the state does not permit counties to contract out for eligibility functions. As noted, Placer County conducts all welfare-to-work services in-house; in Los Angeles County, those services are contracted out. Los

Angeles County also contracts with community colleges to help CalWORKs students on campus secure required forms from the school and navigate the community college system. Stanislaus County contracts with an external provider in the community for some of its welfare-to-work services. The provider assists in running the county's job clubs and helps with employment search.

Integration with Other Human Service and Workforce Programs. Throughout California, TANF is highly integrated with other programs. One benefit of county administration, said a TANF official in Los Angeles County, is that it facilitates integration with SNAP, Medicaid, child welfare, and to a degree, housing authorities, local school districts, and workforce investment boards. Because most TANF recipients are eligible for SNAP or Medicaid, workers in local offices typically handle applications for all three programs, even though in many counties separate offices exist for the programs. Throughout the state, anyone who is a mandatory welfare-to-work participant is eligible for supportive services such as child care. In at least one county, Stanislaus, welfare-to-work services are integrated in the same office as Workforce Investment Act programs. "We're a one-stop shop," said a local manager. "Any of our intake workers or phone workers can answer questions for any program, and they do." In Placer County, TANF and welfare-to-work programs are integrated. The office layout is open (without the traditional security features of welfare offices) and customers can use computers to search for jobs, workshops, and employment counselors or to prepare resumes.

Staffing and Hiring. Counties in California determine whether caseworkers focus only on TANF or on a broader set of services. County administrators (subject to collective bargaining agreements negotiated in each county) generally have sweeping authority for staff hiring, firing, the setting of employee qualifications, and overall staffing.

COLORADO

Service delivery in the state varies widely across counties. Counties make diverse choices in how to manage their processes, what services to provide, whether to contract with providers, and how to staff their offices.

Intake, Case Management, Employment and Training, and Supportive Services. Caseworkers' roles vary by county in Colorado. Some counties have program-specific caseworkers; others assign staff to cover multiple assistance programs. Caseload management also varies (that is, whether to assign cases to a specific worker or distribute work by tasks). Administrators have noticed a shift toward task-based caseload management, and Colorado has contracts for technical assistance with business process redesign in the 10 largest counties. The Change and Innovation Agency, a vendor, was in the process of evaluating Colorado's business processes during the study team's visit. The extent to which counties provide supportive services or offer diversion benefits for TANF-eligible families can vary across counties.

In El Paso County, a team provides intake for those applying for Colorado Works and helps them also apply for food assistance, family medical assistance, and any other needed services. The county adopted this service integration approach many years ago "to emphasize that there's no wrong door to come in for services," a county administrator said. Initially, the county aimed to limit the number of times a family needed to visit the human services office by working with the family on a needs assessment and employment plan ("individual responsibility contract") during the intake visit. However, the staff realized that families were so "desperate" to get the cash assistance that they could not fully engage in developing employment plans. A few years ago, the county changed its approach so that families could complete the eligibility process on one day and come back another day to develop their employment plans. Administrators said, "We thought people wouldn't show, but the no-show [rate] didn't skyrocket."

Local administrators in Fremont County recently changed how local staff delivers services. Previously, separate units handled intake for TANF, SNAP and Medicaid. However, the recent Medicaid expansion eliminated the need for a separate SNAP unit because anyone who is eligible for Medicaid is also eligible for SNAP. Families are now able to work with a single staff member to apply for all needed programs. Families turning in applications can choose whether they want to complete the intake process with a staff member that day or make an appointment for another day.

Contracts with Service Providers. The decision whether to contract for services varies considerably, state administrators said. One county might contract with its workforce center to develop work activities, another might contract with a nonprofit organization for employment services, and a third might use its own staff. In addition, counties can create benchmarks and details in performance contracts for privatized services. According to a representative from the CHSDA, the decision to contract for services may fall along urban/rural lines, geographically, or even by how a region's health care or education systems are set up. Also, in some areas, there are too few nonprofit organizations or private groups to contract with.

When a contractor serves multiple counties, it must adjust its services to meet the county-specific requirements. For example, in the Denver metro area, where three counties (Denver, Adams, and Arapahoe) contract with a single vendor for employment services, "people could move across the street to another county and be subjected to different rules and regulations," a state administrator said.

Integration with Other Human Service and Workforce Programs. In Colorado counties, connections between TANF and Department of Labor programs vary. In some counties, TANF and Labor programs are located together and have strong connections; in other counties they have no connections; and in most counties the degree of connection is somewhere in between, according to program administrators. Most counties have adopted "no wrong door" policies to help individuals access services. The option rests with the county whether to employ program-specific or general caseworkers. State administrators said different programs within a county could be located together or in separate offices, and relations between programs in an area could be strong or disjointed. On one hand, "There's really open and consistent communication about what is going on, what's happening, where we are overlapping [among programs], and where are there other gaps," one state administrator said. On the other hand, "Some don't speak at all." Most of the counties, the administrator said, "are in between." In El Paso County, the Pikes Peak Workforce Center is located in the same building as the county human services office, although the entities are separate and the workforce center that serves El Paso County jointly serves a neighboring county. An El Paso County TANF administrator said, "They [the Workforce Center] do job fairs. We certainly encourage our clients to attend those. We do them here sometimes…but we don't have a direct relationship with Department of Labor programs, or responsibility for the oversight. It's more of a partnership." In Fremont County, too, the human service and workforce entities are separate but do coordinate efforts. In addition, a high-level staff member of the human service agency serves on the regional workforce board.

Staffing and Hiring. Staffing and hiring can vary significantly from county to county. There are no state-mandated, standardized qualifications for caseworker hiring, and it is up to county administrators to set job descriptions and qualifications, including salary and benefit levels.

MINNESOTA

Counties in the state may administer assistance programs however they deem best. Smaller counties often join a regional effort to share the administrative and financial tasks.

Intake, Case Management, Employment and Training, and Supportive Services. Eligibility workers in the counties may be generalists or specific to a program, for example only working on TANF. Some counties divide caseloads among eligibility workers based on client characteristics, and other counties assign workers to either intake or on-going case management tasks. Both Hennepin and Chippewa counties have adopted a case-management approach (as opposed to a task-based approach), but officials said some counties in the state have transitioned to task-based systems. A county-by-county description of which models were in use was unavailable. Hennepin County was moving toward a system of area service hubs within the county. In Chippewa County, local human service managers have the option to offer emergency assistance to some TANF families, typically in response to a specific need, while other counties in the same operating area do not offer additional assistance. Hennepin County offers family stabilization services, not required by the state, to a subset of TANF families. The county finances the services.

Contracts with Service Providers. Counties can contract for services or not. Most contracts are for employment services, county TANF administrators said. Some counties join with other counties to collectively contract for employment services. In Hennepin County, contracted employment services staff provide employment counseling, in part because of a diverse population with unique needs, such as concentrated immigrant groups. A county human services manager said there are disparities among the population in "employment, health status, education, and high school graduation rates. There is a big divide there and a continual challenge for us in providing employment services."

Staffing and Hiring. Minnesota counties can use the statewide merit system for hiring or they can use hiring qualifications that are unique to their county. Individual counties, and often county boards, are responsible for determining appropriate staffing levels. Counties without the infrastructure to operate large human resources departments tend to rely on the statewide merit system, a local TANF manager said. Managers in Chippewa County, which uses the state merit system, noted that they have less flexibility in job descriptions and the state must review all postings. Larger counties are more likely to develop their own civil service processes. These counties have more flexibility to set job descriptions. Administrators said that because benefits or compensation can vary across regions, counties could be competing for the same workers.

NORTH DAKOTA

Of the four states the study team visited, North Dakota counties had the least flexibility in service delivery decisions. Although all counties are on the state merit system and the state sets employment service contracts for all counties, local administrators do have authority to determine how they assign cases to caseworkers and some staffing decisions.

Intake, Case Management, Employment and Training, and Supportive Services. Some counties are changing how local offices handle casework, shifting from assigning caseworkers a set caseload to assigning specific tasks, which leads to a client's needs being handled by multiple workers. Counties have the autonomy to adopt the business process model of their choosing. Counties also vary in whether they have dedicated TANF-specific workers or caseworkers who work in more than one assistance program.

Contracts with Service Providers. The state contracts with three employment service contractors, with one contractor covering the large majority of localities. Authority to enter into contracts ultimately rests with state administrators, and North Dakota restricts counties from independently entering into human service contracts. The state reorganized contracts in the late 2000s, moving away from a prior, dominant contractor. The contractors provide client case management for employment services, and they work from a state-provided employment contractor handbook. The state does not set explicit performance measures for the contractors, but both state administrators and officials in the employment services organizations said there is an understanding that continued poor performance will compel the state to rebid for services. "We are a private contractor for the department—the competitive bid. If we do not do our job, we get fired," one contractor said. "We have some integrity on the line." Some contractors said providing employment services in the current arrangement rather than as state employees allows for greater flexibility and adaptation to local circumstances. For example, the state's largest contractor said its ability to make home visits, if needed, helps ensure client participation, especially in more rural areas.

Integration with Other Human Service and Workforce Programs. One of the state's three employment services vendors (serving only the state's most populous county, Cass County) also administers Workforce Investment Act programs while the other two vendors do not. Although the other counties administer an array of human service programs, including TANF, only Cass County co-locates these programs in county offices. In all but the most rural or smallest county offices, where workers are more likely to handle all programs equally, TANF frontline workers concentrate on TANF but also handle all other programs a TANF client is enrolled in, a state administrator said.

Staffing and Hiring. The state develops job descriptions within the merit system and, by extension, counties follow the state-established structure for employment requirements and pay scale. However, benefits such as vacation, retirement, and health insurance may differ by area. County TANF directors, under the authority of county boards, are free to determine the number of staff needed and whom to hire. Some county workers actively seek state jobs because of the potential for more generous pay and benefits, a state administrator said, making it hard to retain the best workers, particularly in counties near the state capital, which tend to be feeders for state employment.

Implications for Families Moving across County Lines

Given the greater flexibility in county-administered systems, clients may experience greater variation in services if they move to another county. However, county and state officials in each of the study sites reported that such transitions were generally seamless. The team did not interview clients. In none of the study states are recipients required to reapply after a move.

In California, the cases of families crossing counties are transferred, although state and county TANF managers reported clients could experience a delay or difference in service quality after a move. “It could be smoother, but [it’s] certainly not designed to be a start-over,” a state TANF official said. Clients are often required to make a new appointment in their new county, and county workers may need to communicate with each other if a recipient’s case information is not transferred as intended. In addition to different supportive services offered across counties, clients might experience different modes of accessing caseworkers, such as the availability of on-line or phone communication.

In Colorado, case information of families moving across county lines is transmitted through a structured county transfer system, and benefits are not disrupted. The newly arrived family’s case must be reevaluated and it is subject to availability of resources and supportive services in the new county, which may not be the same as in the county they left. For example, some counties have wait lists for child care subsidies. In theory, although not currently the case in any county, a family’s cash benefits could increase or decrease in the new county if one of the counties decided to augment the standard grant with locally financed TANF grants. County TANF administrators said the process, at least in some areas, used to be more acrimonious. “It used to be a sibling rivalry between counties,” said one El Paso County official, “but we’ve developed policy and procedures where when someone comes here, the case transfers from CBMS and they need to develop a new Individual Responsibility Contract. Depending on the county, things are quite different than they are here.” In that county, one caseworker is dedicated to just check for transfer cases each day.

Minnesota and North Dakota share similar procedures when families move. In Minnesota, families are transferred within the state’s eligibility system, MAXIS. County TANF managers said recently arrived families are connected with caseworkers in the new county; workers can communicate with a recipients’ previous county to migrate their employment services plan. “It’s an extra effort on our part,” a Hennepin County manager said. A TANF manager from the smaller Chippewa County said a recipient’s previous employment and training provider may have failed to close the person out of their system, and for recipients moving from some bigger areas, the cases are not closed out as quickly. Clients’ employability assessments are available through the state system. In North Dakota, the state client management system allows for a family’s file to be transferred online when initiated by a county-level worker. The originating county formally notifies the new county of the moving case with a referral, although internal processes can vary by county, local managers said. The new county then assigns the new case and makes a referral to that county’s employment or work services contractor.

Engagement with Community Partners

CALIFORNIA

Counties in California regularly engage with local partners. Caseworkers in Los Angeles County are trained to refer clients to community-based organizations in the county that are contracted to provide services. The referrals are for services such as domestic violence, legal, and mental health and substance abuse services. In Placer County, human service managers said the county has informal relationships with community-based organizations to help clients with employment services, but the county also has established (1) ongoing agreements with five nonprofit agencies to provide unpaid work experience opportunities, (2) memoranda of understanding with adult education and local community colleges for adult education and training, and (3) contracts with both the Community College Foundation, a nonprofit education-focused organization, for paid internships and MTI College for job preparation training.

Stanislaus County engages extensively with community partners, reflecting their core values, according to administrators, to maintain a community presence in every service the county offers. "[Our community partners] are always at the table with us making those decisions," one Stanislaus manager said. "The community plays a part, and they really do feel a sense of ownership in the programs and support…We've been real fortunate in that." Stanislaus County staff said the county has either memoranda of understanding or formal contracts with more than 100 different partner agencies in the community. Community groups played a key role in responding to the recession that began in late 2007, county welfare staff said, when funding cuts hampered the county's ability to fund certain services. For example, when Stanislaus County funding was eliminated for three clean-and-sober-living homes that had successfully served county TANF clients, members of the faith-based community approached the county with a plan to raise alternative funds. A financial donation from the faith-based community enabled the creation of a nonprofit that allowed the homes to continue operating. Further, the county was able to use the financial contributions as leverage to access an additional $3.5 million in child welfare dollars. "When you talk about a state-run versus a county-run system," a manager in the county said, "it is how the community comes forward to work with the department. So many of our families are [receiving services] through mental health and substance abuse treatment programs."

COLORADO

In Colorado, El Paso County has formal contracts with community partners such as Goodwill Industries International, primarily for employment services and case management. In addition, county TANF managers in both El Paso and Fremont counties said the local offices might work with community groups in an effort to engage clients. "One of the values and benefits of [county administration] is having a county design a TANF program specific to resources, community partners, and economic diversity," a senior state TANF official said. "I think it has really helped our particular program." In El Paso County, 40 to 50 workers from outside organizations ranging from domestic violence programs to behavioral health organizations are located in the same building as the county human services office. El Paso County has convened a group of community partners to provide input on certain aspects of the county's TANF policy where the county is afforded flexibility, such as time limit extensions. El Paso County also proactively works with its relatively conservative community to build understanding about the role of the Department of Human Services. "We work hard in many different and nontraditional ways to help [the community] invest in what we're trying to do," an El Paso County manager said. "We work with nonprofits, the faith community, public-sector folks to educate them about what their local Department of Human Services does. [We have] many private citizens who think we're giving away free money, and it's a constant education piece. …We are open and invite people to come in."

In Fremont County, local officials noted that many community partner organizations are active in referring clients or potential clients to the county for services, and collaborations with faith-based groups is not uncommon. In past years, Fremont County offered TANF-funded community grants to nonprofit organizations that worked with low-income families. However, as the county depleted its TANF reserves during the recession and was limited in the amount of reserves it was allowed to maintain, those community grants ended. A county TANF administrator said some of the programs that lost county funding are no longer available, though some are going strong and continuing to help families.

MINNESOTA

Chippewa County refers clients to a community action agency and the Salvation Army, among others, so they can learn about other resources available to them as an emergency backup should the provision of state benefits be interrupted or otherwise prove incongruous.

NORTH DAKOTA

Senior state TANF administrators said counties have the ability to innovate, including collaborating with community partners and nongovernmental organizations, and most counties do collaborate with outside groups. Transportation assistance is the most common need among clients, which county partnerships with outside groups in Cass County, which includes Fargo, work to address, state administrators said. These partnerships are not common in other counties. In Cass County, county administrators have arranged with a local transportation agency to provide bus tickets for some TANF clients to travel to and from work assignments or day care providers. Finding child care is another significant need, state administrators said. Counties may partner with groups such as the YMCA in connecting TANF recipients to child care, and county workers often go beyond their job descriptions in helping recipients find child care from community organizations.

Information Technology

States provide IT systems to counties for core eligibility and benefit applications processing, although the states vary in the extent to which they provide ancillary technology packages and support. Often, counties' key IT decisions are associated with their population size or number of county employees needing access to the system. Possibly because financing of at least some IT-related costs falls to the counties in many of the study states, counties in some states frequently collaborate to stretch resources. The ability of states and counties to use the data to create reports varies widely. A package of basic, preprogrammed reports often is made available to county staff as part of the state's eligibility system. Counties' ability or willingness to undertake additional data analysis is at times connected to its size or metropolitan status. Counties within a state can hire dedicated data analysts, but these costs often are assumed locally.

Use of Statewide and County-Specific IT Systems

CALIFORNIA

Rather than provide a single statewide automated system for the TANF program, California has multiple (currently three, but soon to be two) automated systems, called consortia, that groups of counties use. The three consortia each encompass approximately one-third of the state's caseload. Collectively, the multiple systems are referred to as the Statewide Automated Welfare System (SAWS), and each individual system supports eligibility, enrollment, benefit determination, and case management. In addition to TANF, the systems also manage other assistance programs such as Medicaid (called Medi-Cal in California) and CalFresh and are required to interface with the California Healthcare Eligibility, Enrollment, and Retention System, which supports the state's health insurance exchange.

Spanning the three Statewide Automated Welfare System consortia, the Welfare Data Tracking Implementation Project, a data tracking system, allows for the California Department of Social Services and all 58 counties to access information on how long clients have received TANF, including from counties in other consortia and other states.

Counties are not responsible for the operating costs of the data system; however, other programs administered by the consortium, such as CalFresh, require a county funding share to cover costs. Counties are financially responsible, either with county dollars or the county's single TANF allocation, for most other hardware or software to aid in service delivery. For example, if a county wanted to implement a visitor check-in system, the county would be required to cover that cost. In one of the counties the study team visited, the county was able to acquire a software program free of charge from another county that procured it to assign tasks to workers. Other managers reported similar collaborative agreements to stretch IT and technology resources.

COLORADO

The state provides counties access to the CBMS coupled with CFMS, both of which every county must use. CBMS administers public benefits across the state including TANF, SNAP and other nutrition programs, Medicaid, and adult financial programs. Many senior officials within CDHS said Colorado's shift to CBMS, which began in September 2004, was associated with a host of performance issues, including slow processing, inaccurate benefit terminations, and huge backlogs that still reverberate years later. The difficult transition led to a lawsuit against the state by a nonprofit advocacy organization. The state is still under a settlement agreement for TANF, Medicaid, and food assistance programs for meeting court-ordered performance benchmarks. "People are still suffering," a senior CDHS official said. "It just was not ready to roll, and it rolled out with big backlogs."

Governor John Hickenlooper's election in 2011 marked a change in the state's approach to the challenges of the CBMS system. The state moved toward greater accountability to recipients, state officials said. In response, administrators began holding meetings across multiple agencies to modernize and improve the system. The recent upgrades and increased focus on staff development have resulted in marked improvements to CBMS and ease of use in the system, staff said.

Although the state provides the underlying IT system for eligibility, benefits processing, and caseload management in CBMS and CFMS, counties are responsible for providing infrastructure to support the required networks. The counties can ask a state contractor to provide all of the IT support (albeit at a higher cost to the counties). Counties that do so are known as "to-the-desk" counties. Counties that use their own IT staff and infrastructure are referred to as "to-the-door" counties. Roughly 20 of Colorado's 64 counties are to-the-desk, and typically are small or midsized counties. As a human services manager in El Paso County described their to-the-door model, "CBMS, CFMS, all those types [of applications] come directly to the county, and the county is responsible for server lines. Security is through the county IT, and we're responsible for making sure that…new [staff] get online." Conversely, Fremont County Department of Human Services, which serves a smaller population, is a to-the-desk county with no IT staff. Fremont County relies on the state and its vendors for computers and service to the state network system. There is no cost to the counties for CBMS computers. However, if a county needs more than the number of computers provided by the state, then the county must use county funds to buy additional computers.

MINNESOTA

Similar to California, Minnesota provides core IT systems for administering both the cash and employment services components of TANF, and counties can supplement these systems by using county money, state officials said. Eligibility determinations for Minnesota's TANF program, MFIP, are conducted by MAXIS, a legacy, mainframe computer system. Eighteen other human services and health care programs also use MAXIS, including SNAP, general assistance, refugee cash assistance, and medical assistance. Workforce One, itself considered dated, is the web-based client management application that counties (and their contractors, where applicable) are required to use for the employment and training component of TANF. Other programs in Minnesota using Workforce One include the state's diversion program, SNAP, and non–TANF education and training. Workforce One was in the process of being updated when the study team visited, and a new program, Cúram, will replace MAXIS in 2016. Senior Minnesota Department of Human Services officials reported no specific challenges with MAXIS beyond its age. The state requires all county workers to be certified in using MAXIS before being granted access to the system, and training is provided first in online modules culminating in a three-to-four-day in-person session. Counties are responsible for the travel costs of workers to attend the training. State-provided training is part of a larger set of help-desk-type services provided to the counties and county workers primarily for issues with MAXIS or Workforce One, state officials said. In the past, the Minnesota Department of Human Services managed MAXIS, but responsibility for both MAXIM and Cúram will migrate to the new state IT service department.

Counties generally are required to procure any IT components outside of the eligibility and employment services products of MAXIS and Workforce One. Counties cited electronic document management, phone translation services, and phone interactive voice response systems as technology commonly procured (and financed) by counties outside the formal Minnesota Department of Human Services structure. Hennepin County developed its own document-imaging program in the mid-to-late 1990s that is still in use, albeit in need of updating. It also procured its own interactive voice response system. The county finances both systems. Counties both large and small reported collaborating to stretch IT resources. Senior human services administrators in Hennepin County said they meet monthly with heads of other metropolitan counties and have provided their interactive voice response and language assistance services to other areas. Human service program leaders in Chippewa County said they have wanted to transition to a paperless case-management system using scanning technology but the financing costs have been a barrier thus far. “Those efforts have to be paid for by the county, which is a lot of the reason why we’ve struggled getting there,” one official from the county said. “There is a lot of networking that happens; we get with other counties and learn from each other.”

NORTH DAKOTA

The state provides a standardized eligibility system to all counties and also delivers some secondary IT applications and services, such as client tracking software and server costs. Counties are required to finance any products that the state does not provide, however, and county-level administrators said that initiatives often undertaken on a pilot-basis by individual counties are later picked up and financed by the state to the balance of counties. For example, the client tracking software in the process of being distributed statewide began as a county-funded pilot, a state human service official said. On another ancillary system, a document imaging program, the state pays for the licensing fees and monthly costs of the network, but the counties are responsible for financing the scanning hardware. Because the scanners are used across multiple programs, counties allocate the start-up costs across TANF, Medicaid, child care, and other programs, a senior North Dakota Department of Human Services official said. Employment services contractors in North Dakota are required to provide their own IT systems but also use a state-provided screening tool, the Online Work Readiness Assessment. The screening tool, a web application, began as a pilot in 2009; an employment services contractor said the program took longer than expected to be rolled out, but they were appreciative to have been given the chance to provide feedback, and the tool has been helpful overall.

North Dakota’s Information Technology Department provides support to counties for interfacing with the primary eligibility system, but counties themselves are responsible for financing and obtaining other IT-related support, such as server costs beyond the eligibility system, setting up a local area network, desktop support, maintaining an email system, word processing, and other desktop applications. This arrangement often presents counties with the choice of providing IT support and server management in-house or contracting with an external provider, often through a subsidiary of the North Dakota Association of Counties, which charges a separate, negotiated fee for IT services. County size, and specifically, the number of employee workstations, often is the determining factor for counties in establishing an in-house department or engaging an IT contractor, according to a representative of the county association. “Once you reach 50 or 60 desktops, it probably makes sense to have somebody on staff. The volume makes it a little cheaper to be there." Also, the state is using 90 percent federal matching funds to help build a new eligibility system with the goal of including TANF and the state's other human services programs in the new application along with medical assistance, a senior North Dakota Department of Human Services official said.

Ability of State and Counties to Create Reports and Access Data

CALIFORNIA

In California, counties "own" the data collected by the various consortia, but the counties historically have shared data extracts with the state. County managers reported relative ease in creating and customizing reports, although there may be some minor variation among consortia and individual counties using the same system. In Los Angeles County, county managers have access to many preprogrammed reports, including detailed caseload characteristics. Data extracts can then be packaged into a data dashboard that includes employment services and caseload processing information. One downside in Los Angeles County is that the information is not "real-time," although future plans are moving in that direction, one manager said. TANF managers in Placer and Stanislaus counties also said they create reports using data from the respective consortia. In Stanislaus County, local managers pull data daily so workers know which cases they will be assigned for the day, and a human services manager said they use regular reports to monitor caseload numbers. "We can set any report we want," the manager said. "We can also use reports to see if there's training we need to give our staff— maybe we're having a problem in a specific area."

There is no single client database for the state as a whole. "I'm not that concerned about it in as much as the three consortia that operate are fully cooperating with us," a senior state human services official said. "When we want management data, they give it to us in whatever form we're asking for." The County Welfare Directors Association of California can, and often does, act as a conduit for producing files of data, CWDA representatives said, and CWDA staff frequently perform data analysis and surveys involving the counties. Legislative staff also may approach CWDA for data collection involving the counties, although this is often done on an ad hoc basis as there are no standing data reports established between CWDA and counties, staff said. At the county level, staff rely on in-house analysts for monitoring.

COLORADO

In general, Colorado counties use the state's Cognos software system for generating reports from the CBMS that county office staff frequently rely on, a senior state human services manager said. State workers pull reports weekly on whether tasks are being completed on time, among other issues, and the state tracks eligibility backlogs. Tracking backlogs is important because Colorado is under a court order to improve timeliness in processing applications for certain assistance programs, including TANF. State staff recently augmented the capacity to track work and employment services data. In a bid to overcome a self-described poor ability to track this data, Colorado recently modified the system to better capture information on employment outcomes and other work-related data. In the past, the system only tracked one measure, work hours. "We're still struggling with having good [employment] data," one senior state manager said. "Gaining the information has been a huge challenge."

Although all counties have access to CBMS data through Cognos, the degree to which localities use the data is often determined by population size and whether the county places IT staff in-house. "You can always run reports out of Cognos, but one of the issues with counties without a robust staff is knowing which reports need to be run in Cognos and which data reports are most helpful and how those can be utilized—a 'top-10' list hasn't been developed," one senior state official said.

Counties with larger capacity may provide their own tailored reports as well. In El Paso County, human service managers described how, in addition to the preprogrammed reports available, they can design some custom queries in the system. Obstacles to wider use of custom reports are the limited number of licenses for access to the software and the depth of local IT departments, even among the larger or more metropolitan counties. "Creating reports rests with the managers. Sometimes our IT staff aren't able to get us what we need," an El Paso County official said. In more rural Fremont County, human service managers said they can use predesigned reports from the state system, which is critical for county staff to track and balance financial data such as caseload counts and expenditures. One potential drawback to the flexibility afforded counties in deciding which technology systems to develop or use is the unavoidable disparity between counties in their IT system capabilities, El Paso County administrators said. For example, some counties have data dashboard systems, scanning or document imaging programs, or access to an external, subscription-based employment verification database, but others do not.

MINNESOTA

State officials in Minnesota regularly create county performance data as part of the expanded set of performance measures on the Self Support Index as well as monthly caseload reports required by state law on 10 features of the caseload. Counties receive monthly reports on the work participation rate and caseload information and less frequent reports on the special performance measures in the Self Support Index. Chippewa County human service managers can create some reports from a special section of MAXIS, although specific measures are not always available. The county also receives some information from the state to help fill in the gaps in areas of interest to county administrators, although the data are limited to what is available from the MAXIS and Workforce One systems, a county manager said.

NORTH DAKOTA

North Dakota provides monthly reports to counties on the work participation rate. Beyond the required standard reporting, few staff are aware of the possibility of extracting data from the eligibility system, an administrator said. State TANF staff said North Dakota makes an effort to provide counties with any requested information from the eligibility system. The information is provided at no cost. Administrators said large counties typically are more active and interested in requesting reports. The requests typically stem from county commissioners interested in the number of clients receiving services or the distribution of TANF clients by various demographic or socioeconomic factors. Local officials sometimes request city-level information, which the department can oblige as well, although administrators said they take special care to eliminate any personally identifying information. Some counties make such requests sporadically; others request monthly reports.

Conversely, if the state were interested in collecting information beyond the eligibility system, the state would issue a request to the field, although state officials said county participation to comply is voluntary. Some state administrators hope that as more counties adopt a process management business model, in which the counties assign caseworkers to specific tasks but with no set caseload, more options for generating reports would arise. Employment service contractors said staff enter information for assessments and other tasks into the state-provided system, but if a contractor wanted to review information from the system, that person would make the request directly with the state Department of Human Services.

County TANF Administration in New Jersey and North Carolina

Two states with county-administered TANF programs not included in the study's site visits, New Jersey and North Carolina, provided information via brief surveys and phone interviews.

New Jersey

Administrators in New Jersey reported that the TANF program has always been county administered. Bureaucratic responsibilities are set by statute and regulations, and the state Department of Human Services Division of Family Development sets WorkFirst NJ (TANF) policies and procedures for New Jersey's 21 counties. The counties have some discretion in how the program rules are carried out and interpreted, state administrators said, although service delivery mechanisms across counties are similar since the state employs a case-banking/case-processing business process. Neither the state nor the counties use privatized services or contractors. A range of county structures—a county executive in tandem with a county director of human services, citizen services, and the local welfare department—help shape local human services program delivery, including TANF, and the frontline workers in the local offices are county employees.

New Jersey finances WorkFirst NJ with a combination of state and county dollars in addition to the federal block grant. The state allocates funds to the counties across multiple programs, namely, TANF, SNAP, and child care. The allocation is based on a method that incorporates prior year allocations, expenditures in the prior quarter, and caseload size. Counties' allocations, which are determined with no county involvement, are for administrative and program costs, administrators said. Although counties are expected to fund a portion of program costs, it is not a state requirement to do so. It is also up to each individual county to determine the amount of funds to contribute, if at all.

All policy decisions are made by the state without county involvement. Counties are free to fund tailored social service programs using county dollars, but no TANF funding is involved, state administrators said. Funding to the counties is not tied to performance, but individual counties are responsible for the work participation rate. The state's Department of Labor and Workforce Development provides employment services for TANF clients at its One-Stop Career Centers as part of a consolidated approach in conjunction with social services boards, county welfare departments, and individual counties. Neither state nor county administrators use performance measures for TANF beyond the work participation rate. A statewide automated system and a team of field representatives assigned to individual counties monitor and assist with program compliance. The statewide automated system also handles fiscal and work participation reporting.

North Carolina

North Carolina has had a county-administered cash assistance program for as long as state administrators can remember. “We’ve always had 100 counties and county departments, and we’ve always had an AFDC and workforce program in each county,” a senior state TANF administrator said. In considering changes to its cash assistance program following PRWORA, administrators pointed to the additional flexibility for services and service delivery as a primary factor in deciding to maintain county administration.

None of North Carolina’s counties has full autonomy over their TANF programs, called Work First, but all counties share at least some responsibility for TANF implementation. For example, county staff help determine financial management, administrative responsibilities, performance measurement, staff hiring and training, contracting for services, and IT and data system management. The state provides specific requirements for training, monitoring, and accountability, and guidance on implementation. It is up to the counties to interpret and implement the state requirements. Counties have flexibility in local office management and authority in personnel decisions. “Ultimately, they have flexibility on how to meet predesigned outcomes,” a state TANF administrator said. In addition to formal reporting mechanisms, states and counties communicate through a mix of meetings, written memoranda and letters, website communication, and emails.

The state writes policy for all 100 counties, and most policy decisions are exclusively determined by the state, such as setting work requirements, determining sanction procedures, setting time limits, establishing family caps, and determining the child support pass-through. However, a group of seven “electing counties” can design their Work First programs, including eligibility criteria and benefit levels. Nonetheless, this discretion is subject to limits and close review by the state Department of Health and Human Services and the General Assembly. The remaining 93 counties are known as “standard counties” and follow the rules outlined in North Carolina’s Work First policy manual.

Unique among the study states detailed elsewhere in this report, North Carolina’s counties request “electing” status from the state and have flexibility in proposing alternative rules. State law requires the electing counties as a group to contain no more than 15.5 percent of the state’s Work First caseload as of September 1 each year, and any county seeking electing status must triennially submit to the state Department of Human Services a local block grant plan that describes its proposal. Electing counties give local residents the opportunity to review the local block grant plan before submission, and the block grant plan itself is drafted from a committee of county government and community stakeholders appointed by the County Board of Commissioners.

In practice, the policy options of electing counties are limited to areas of eligibility determination (such as which family or household members to include, or who may be the qualified caretaker in a child-only unit) and which resources to count for the asset test. The number of electing counties has declined over the years, state administrators said, in part because electing counties are viewed as informal testing grounds for innovative policies, and standard state policy now includes demonstrated innovation and flexibility.

North Carolina uses TANF administrative funds for a range of uses, including IT systems, data reporting systems, assessment and referral processes, and staff training. Funds allocated to local offices are combined in a single allocation and are not differentiated by administrative or program dollars. The allocation to local offices varies year to year, state administrators reported, and the state was obligated to reduce funding levels during the recent recession. Both the state and counties are expected to contribute to North Carolina's MOE requirement.

The state previously used performance measures in addition to the federal work participation rate for program oversight and monitoring, but North Carolina currently uses only the work participation rate, administrators said. The state requires underperforming counties to submit an improvement plan, but potential federal financial penalties would not be imposed on the county. However, the state requires counties to cover the cost of benefit overpayments or other compliance errors.

The state Department of Health and Human Services is in the middle of implementing a statewide, integrated eligibility system, NC FAST, which the state funds and provides to counties. Counties may supplement state-provided hardware and software applications using local dollars, state administrators said. With the advent of the new system, TANF recipients' cases will automatically be transferred if they move to a new county. Presently, counties are required to close families' cases and require the family to reapply in their new county.

Compared with more constrained policy and financing decisions, North Carolina counties have considerably more autonomy in the areas of service delivery and designing employment programs for TANF recipients. Local workers are county, not state, employees, and counties control how staff handle caseloads and also staff salaries and benefits, which vary from county to county. The state continues to manage retirement benefits, which are standardized. All counties have flexibility to design their employment programs to meet local needs, state administrators said, and this local control can include the decision to contract with private or community groups such as community colleges or workforce development organizations. The required hours and employment activities the state requires recipients to be engaged in are uniform statewide, but counties can shape how each allowable work activity operates locally.

How Do County-Administered Programs Differ from State-Administered TANF Programs?

County-administered TANF programs differ from state-administered TANF programs in a few key ways. However, considerable variation exists among individual state administrative approaches. The defining, unique elements of county-administered TANF programs are the following:

- TANF services are delivered in county-run local offices by county employees
- County governments are at least partially responsible for funding TANF
- County elected officials have a role in reviewing the local TANF budget, policy, or both

Differences in program administration between state- and county-administered TANF programs are a matter of the degree of state authority. Overall, state-administered TANF programs retain greater state authority and allow less local flexibility than county-administered TANF programs. However, just as county-administered programs exhibit a range of authority and flexibility, so do state-administered programs. For example, state-administered programs retain authority for policy development, although a few state-administered programs allow local offices or regions some flexibility in implementing those policies. Table 9 displays the differences between county- and state-administered TANF programs.

TABLE 9

Differences between County- and State-Administered TANF Programs

Degree of difference between county- and state-administered TANF programs	Dimension of TANF administration	County-administered TANF programs	State-administered TANF programs
Areas of distinct difference	Office structure	County offices	State offices in localities
Areas of distinct difference	Frontline workers (staffing)	County employees	State employees or state contractors
Areas of distinct difference	Financial responsibility	County governments have at least some responsibility to contribute funds	State has full responsibility for contributing funds
Less-distinct differences	Policy authority	Counties may have authority to establish policies such as time limit extensions and eligibility criteria for short-term, nonrecurring benefits	State has ultimate policy authority but may allow flexibility in policy implementation in local offices
Less-distinct differences	Information technology	State provides major management and reporting systems; Counties may provide office-level IT; counties may control data from systems	State provides major management and reporting systems
Less-distinct differences	Service delivery: intake and eligibility determination	County processes may vary	Generally uniform throughout state, but some local office variation in work flow
Less-distinct differences	Service delivery: work supports and other services	Considerable variation within states by county	Uniform in majority of states but variation within some states
Very little difference	Eligibility Rules and Benefit Amounts	Uniform throughout state in practice (although Colorado counties may expand eligibility and increase benefits)	Uniform throughout state

Source: Urban Institute and ICF analyses.
Note: TANF = Temporary Assistance for Needy Families.

County- and state-administered TANF programs as a whole do not differ in the program outcomes they achieve, such as the work participation rate, the percentage of poor families in the state who receive TANF, or the average earned income of TANF families. They also are indistinguishable in terms of time limits and average monthly benefits. Likewise, states that choose to administer TANF at the county level are no different from other states in terms of state population, population density, and child poverty rate.

The remainder of this section describes the array of choices state-administered TANF programs have made in TANF administration and service delivery. This information allows readers to compare and contrast state-administered programs with the choices of county-administered TANF programs. To examine the degree and dimensions of variation between states with county-administered and state-administered TANF programs, and to identify characteristics that apply generally to both administrative approaches, the study team collected data from 29 of the 43 state-administered programs.[16] The team selected these states to include a maximum share of TANF caseload and diversity in caseload size and other program characteristics. Together, these 29 states serve 41 percent of the national TANF caseload and 82 percent of the total TANF caseload served by state-administered programs.

History of TANF Administrative Structure

Most states with state-administered TANF programs (21 of 29 interviewed) have maintained the same or similar structure for administering cash assistance in TANF as they did under AFDC. Among those that changed, three modified the administrative structure during the transition from AFDC to TANF, and four other states changed roles sometime after implementing the TANF program. Among this latter group, states were split between devolving and consolidating TANF responsibility. For example, from 1996 to 2005, Arkansas's program had elements of county administration but shifted to more fully state-administered when responsibility for managing TANF operations transferred to a different state agency. Florida, Idaho, and Montana also curtailed county or regional involvement. Maryland has a hybrid administrative structure (falling between county- and state-administration), but according to state officials, the process evolved over 15 years. In Maryland, each local jurisdiction submits a plan defining the program for state approval. State employees, not county employees, carry out service delivery, except in Montgomery County, where county employees deliver services. The state has recently committed to move further toward a fully state-administered structure. Maryland state administrators believe that having the ability to customize some elements of the program's employment services did not lead to the desired effects. Conversely, Indiana in recent years has responded to calls from a new executive administration to adopt a regional structure for operating

TANF in its hybrid administrative form. The bulk of states that enacted a change in state or county roles during the move from AFDC to TANF describe the modifications between the state and regions or counties as modest in scope, usually adding some element of local involvement without fundamentally changing the overall TANF administration structure, such as Arizona carrying over a pre-PRWORA waiver program.

Like Indiana and Maryland, a few other states have hybrid administrative structures that fall between county- and state-administration of TANF. These states include the following:

- Alabama has alternately reported being a state-supervised, county-administered system (i.e., it did so in the eighth Report to Congress in 2009, but not in the ninth in 2012). According to the State TANF Plan, the "state will conduct the Family Assistance Program designed to serve all political subdivisions in the State (not necessarily in a uniform manner) to provide assistance and/or services to needy families with children through County Departments of Human Resources" located in Alabama's 67 counties.
- Virginia operates through a regional structure for TANF implementation and service delivery.
- Georgia also operates a regional structure with a county-level service delivery system.

Wisconsin had a county-administered structure since TANF's inception, but as of January 1, 2013, the state officially identifies as state-administered. The state contracts with private entities to administer all aspects of TANF in ten areas of the state. One of the private contractors subcontracts to a county.

Bureaucratic Structure and Communication

Bureaucratically, 12 of 28 states report using regional or substate units to implement some aspect of TANF. Of these states, most have implemented standard processes for reporting both cash assistance and noncash expenditures. In most states, information is communicated from the centralized human services office to counties or field offices using a combination of formal and informal means, such as policy memos, executive orders, and bulletins coupled with email, conference calls, and in-person meetings. The frequency of these communications varies considerably by state and method. Several states described a centralized structure where the human services agency head or TANF administrator works with senior managers to send communications to a network of regional managers, who then distribute the message locally. For example, in Massachusetts, the Department of Human Services commissioner or the TANF administrator is responsible for communicating with field offices through a network of regional directors, and officials rely on operations memos, procedural guidance, monthly meetings, and daily calls with local offices or managers, with the mode often dependent on the topic or urgency. A Florida administrator also describes an approach in which managers tailor the communication mode to the message: "If it's a policy, it's from [the executive] level through memoranda and brief trainings. If we're trying to communicate business matters… those can be handled by conference calls. Communication is as needed."

Across all areas of managing and implementing TANF, states overwhelmingly either fully retain responsibility or share limited responsibility with counties or local offices. Among the minority of states that delegate responsibility to local areas either fully or in a shared arrangement with the state, none are fully autonomous in carrying out these duties. State legislative mandates or extralegislative state policies or procedures confer responsibility for managing TANF among states (often through rule-making by a state agency). Twenty-one states report that the overall TANF governance structure resulted from some action by the state legislature, and 22 states said that state policies and procedures define the structure. County rules and regulations interact with the governance structure in Georgia and Hawaii, state officials said, and in five other states, other governing authorities or mandates, such as court orders, come into play.

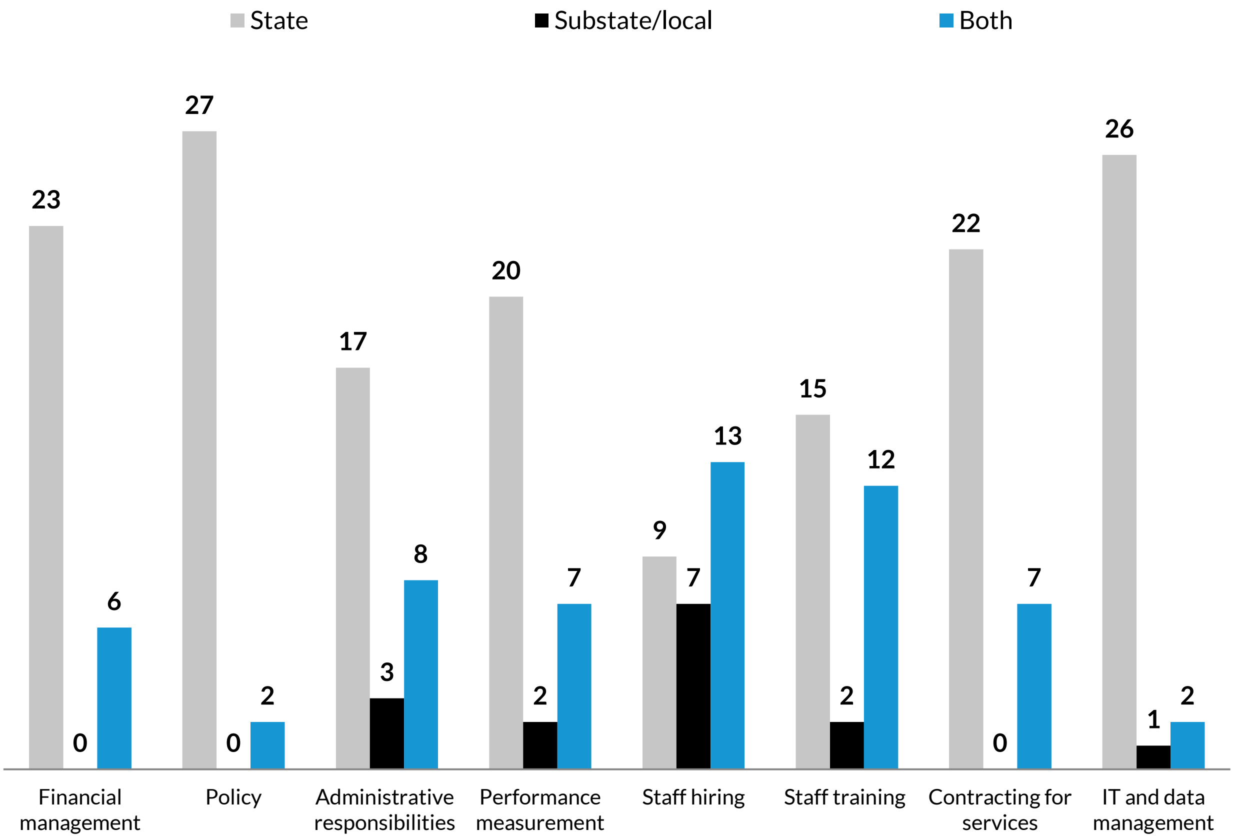
By a two-to-one margin (18 to 9), states said the relationship between the state and lower government entities has not changed with time. In Indiana, state officials said that prior to 2005 more control rested with the county, but since then, county directors have less control, and the program has introduced a management structure regionally with more state oversight. In Arkansas, when responsibility for operating the program shifted from one state department to another, specifics were left up to administrators, but the choice itself to switch agencies was done by legislative mandate. Florida reorganized its nonstate administrative units from "districts" into "circuits," and administrators from Georgia said the business operations in their state have changed dramatically in the past year as counties make more operations choices independent of the state office.

Figure 1 provides an overview of the extent to which these states share or delegate responsibility for various aspects of TANF administration to localities or regions.

FIGURE 1

Responsibilities of States and Local Entities in State-Administered TANF Programs

Number of states



Source: Urban Institute analysis of survey responses from 29 states with state-administered TANF programs, December 2013 – March 2014.

Note: IT = information technology; TANF = Temporary Assistance for Needy Families.

Financial Management and Fiscal Reporting

Financial management is primarily a state responsibility in state-administered TANF programs, although 6 of 29 states report sharing some responsibility with local offices or regions. States that allocate TANF money to local offices or substate entities are nearly evenly split on whether they direct a proportion of funds to be spent on administration or program expenses. States are also fairly evenly split on whether program or administrative allocations vary year to year. In two states, fund allocations vary month to month. States report that allocation changes stem largely from changing local economic conditions, staffing changes, or caseload variation. Both the recession and other state budget issues have affected state funding levels, and potentially county resources, in about half the states. States use administrative funds in multiple categories. The most common use of such funding is for program oversight and monitoring (27 states), but a majority also finances IT systems (24 states), data-based reporting systems (23 states), costs related to the assessment and referral process (22 states), and staff training (21 states). Other uses of administrative dollars include contracting for electronic benefits transfer services and income verification (both in Kansas) and management of fiscal reporting (Montana).

In no state is any portion of the MOE requirement passed down or expected to be borne by counties or lower levels of government. However, several states use local spending to meet the requirement. For example, in Iowa, a portion of what the state counts as MOE spending includes local dollars incurred in administering the program, and in Arizona, spending by food banks and other agencies is included in a portion of that state's accounting. Virginia also uses local expenditures to draw down the MOE total, state administrators said, and while not a requirement in Washington, the state does have agreements with some state and county nonprofit groups whose spending is included. When TANF money is used on activities other than cash assistance, such as nonmarital childbearing prevention and two-parent family programs, a majority of states said that decision rests with the state human services department. In another 13 states, the legislature makes those funding decisions. In four states, the state TANF director makes the call, and in one state (Washington) local office administrators have at least some discretion for spending the funds.

Policy Authority and Development

In all states, the state retains authority for policy decisions affecting eligibility requirements, work requirements, sanctioning procedures, time limits, family caps, and child support pass-through amounts. Only a few states share decisionmaking about program rules, and then only in a handful of policy areas. Several states, such as Alabama and Georgia, said that although not officially involved, state officials often solicit suggestions from counties, and local officials may be informally drawn into the process. Degrees of local policy authority can also vary within a state, usually on the basis of county size. For example, though Nevada as a whole exhibits some variation in determining eligibility requirements and setting benefits, this is especially the case in the two largest counties, which may have different processes and requirements. All told, eight states described some local variation in how policies are implemented, although this variation does not necessarily mean authority to shape policy at the substate level.

States employ a variety of modes of communicating policy decisions and program rule changes to counties and other substate areas. By far, the most popular methods are policy memos (20 states), policy manuals or directives (22 states), email or electronic bulletin boards (17 states), and statewide training (19 states). Less frequently used modes include disseminating legislative concept proposals and memos (2 states), committee reports (3 states), public speeches or testimonies (4 states), functional documents such as legislation, regulations, procedures, agreements (6 states), and newsletters (5 states). In addition, in 5 of 23 states, regional or other substate entities have the autonomy to privatize services. Six states requested technical assistance broadly in policy development.

Program Oversight

Performance measurement is a shared responsibility in at least 7 of the 29 state-administered programs that provided information for this study. Two states delegate certain aspects of performance measurement to substate entities. Performance measurement can take many forms. In all but one state (Michigan), state administrators monitor participation in work activities locally, across the district or county, or regionally. In some cases, this involves monitoring the performance of contractors who handle employment services. States commonly track data by a district or region, which is then reported centrally. South Dakota administrators described a process of periodically reviewing local participation rates, and at times tracking individuals. In other states, such as Montana, monitors visit each contract site twice a year to review employment and training services contracts. Several states reported that the bulk of local monitoring centers on contractor performance, usually for employment services, and in several others, another state agency outside the division handling TANF is responsible for certain monitoring, again usually on employment services. By extension, most states (20 of the 26 answering this question) do not pass down federally imposed state penalties, although a handful of states said that counties might be affected financially because of the overall reduction in available funding. TANF officials from Arkansas, Connecticut, Hawaii, Michigan, Mississippi, and West Virginia said their states would convey federal penalties to a local or county office, although the penalties would not necessarily be financial. For example, administrators from Connecticut and West Virginia said a sanction to counties would usually entail taking some form of corrective action.

In almost all states (25 of 28), penalties for not meeting federal work participation rates do not flow down to substate areas, state administrators said. In Alabama, program managers said some penalties are imposed locally, but with no fiscal consequences. Arizona and Connecticut also reported penalties for subpar work participation rates, including a 25 to 35 percent reduction in funding in Connecticut. In contrast to penalties, Arkansas offers rewards for exceeding performance. Rewards can include individual awards and the ability to attend conferences. Beyond the work participation rate, most states (20) hold localities accountable for additional measures. These extra measures may include timeliness and error rates in processing applications, recipient outcomes, employment and training related outcomes, and general client cooperation. In Maryland, administrators said the state implements a scorecard system that tracks job placement and wages in addition to work participation rates. Wisconsin also tracks performance measures such as job placement and retention, numbers obtaining Supplemental Security Income, among others.[17] In Tennessee, the state holds contractors accountable for recipients' GED receipt, wages, and time in certain work activities. "We wanted to move away from just looking at activity," a state administrator said. "We work to get [recipients] up from minimum wage. For the county offices, we look at performance, caseloads, engagement. There was a time when personnel performance was tied to work participation rate, but now we're moving away from that." Ten states requested technical assistance broadly in data management, and nine states asked for additional technical assistance in program monitoring.

Service Delivery

In general, intake and access services and work supports are uniform across states. Twenty-three states have the same intake process and access to services statewide, whereas 20 and 19 states said they have uniform service delivery and work supports, respectively. Where there is variation in intake processes within a state, the difference typically depends on size of the TANF caseload in each local area or access to or availability of local funding. For example, in Tennessee, in counties with fewer clients, a worker might serve as a caseworker for programs in addition to TANF, whereas workers in larger counties focus solely on TANF, state officials said. Despite largely uniform work requirements, the client experience can differ from office to office. Employment services (such as developing employment plans), for example, will vary by locality or available resources for promoting work. For example, in Washington State the local community services offices have some ability to design life skill programs and barrier removal programs using designated TANF funds. "We ask them to come up with programs that make sense for specific counties," a Washington state administrator said. In only 5 of 29 states, administrators said local or other substate offices have discretion over how nonrecurring, short-term assistance may be used, such as TANF emergency assistance. In Virginia, state officials said localities have some discretion in applying the state's diversion assistance, and West Virginia administrators said there is some discretion for workers with regard to special assistance benefit amounts, subject to limits set by the state. Idaho staff said the framework for this type of assistance is guided by the state, but TANF emergency assistance can be drawn down by regional workers and directed to clients in a personalized way.

On staffing decisions, localities have little flexibility in most states (20), while seven states allow some discretion in hiring or caseload standards. In states that do give counties some say in hiring, discretion is usually tied to available resources: the budget, local caseloads, or both. In Kansas, officials said local offices can use discretion if they stay within budget limits. Nevada state staff adjusts staff levels on the basis of funding, but local county offices are able to suggest staffing level changes. In Wisconsin, a case-manager-to-client ratio is set at 80:1, but contractors can make adjustments within this limit.

All but one (Wisconsin) of 27 states set job qualifications and descriptions, although Maryland and Virginia have at least one county that is an exception. In Virginia, counties large enough to have a self-contained personnel department may set qualifications locally, and Maryland's Montgomery County has a different level of autonomy on staffing and salaries than the counties in the balance of the state. States are split roughly evenly in granting local areas the autonomy to make hiring decisions, but 26 of 27 states (all but Wisconsin) set worker salaries centrally.

In most states, service integration and cooperation between TANF and other work support programs such as SNAP, child care, or Department of Labor sponsored training, are consistent across counties. Florida, Iowa, Kansas, Maryland, South Carolina, and Wisconsin report at least some variance by county. In 27 states (all but Kansas and Wisconsin), TANF families moving from one geographic area to another within a state will continue receiving benefits without needing to reapply.

Information Technology

Managing IT and data services is overwhelmingly a state responsibility, with 26 states retaining responsibility. In one state, the county is responsible and in two others that responsibility is shared between state and local administrators. All 29 states use a centralized information technology system for program eligibility functions and collecting program data. All but two states—Alabama and Nevada—said the IT system handles multiple programs in addition to TANF. In states sharing the system with other programs, the most commonly paired programs are SNAP (25 states), Medicaid (19 states), and child care assistance (10 states). Other programs sharing the IT system include homeless programs, non-TANF work programs, refugee programs, child support, and emergency assistance. Eight states requested technical assistance in IT.

Implications of TANF Administrative Structure

Having reviewed the details of how TANF is administered by states and counties, the questions remain whether the choice of administrative structure reflects any underlying differences in state circumstances or leads to different outcomes for TANF clients and other poor families in the state. This section of the report addresses those questions.

To more fully explore differences between county-administered and state-administered TANF programs as a whole, the study team conducted limited quantitative analyses of secondary data on state characteristics, program characteristics, and program outcomes. These analyses uncovered no statistically significant correlation between type of TANF administration and any of the following characteristics:

- Work participation rate (2009)
- Percent of poor families with children receiving TANF (2010)
- Maximum TANF benefit for a family of three with no income (2010)
- Lifetime time limit (2010)
- Unemployment rate (2012)
- Poverty rate (2010)

When the county-administered TANF programs are ranked with the other states and District of Columbia on a variety measures, states with county-administered TANF programs are among those with the highest and lowest rankings, as well as close to the median, for each of the selected measures. Tables 10 and 11 illustrate the extent of the diversity across states with county-administered TANF programs.

TABLE 10

County-Administered TANF States Ranked Nationally on Select Program Characteristics

Average Monthly Caseload TANF (Oct. 12 to June 13)			Percent of Poverty Population Receiving TANF (2009–10, 2-yr avg.)*			Percent No Adult (Oct 12 to June 13)			Average Monthly Benefit (All Families)			Average Earned Income of TANF Families			WPR (All Families, Nonadjusted) FY 2010			
	US rank	Families		US rank	%		US rank	%		US rank	$		US rank	$		US rank	%	No. of years meeting WPR (2007–10)
CA	1	566,804	CA	2	66	NC	6	71	NY	3	538.50	NJ	8	947.80	ND	1	68.7	4
NY	2	121,570	MN	9	40	OH	9	66	CA	5	499.50	CA	10	919.80	NC	21	37.1	4
OH	4	69,428	NY	17	34	MN	18	50	CO	20	366.70	NY	18	834.80	NY	23	35.0	4
NJ	12	32,461	OH	18	33	CA	20	46	OH	22	356.10	ND	20	823.60	CO	28	33.6	4
MN	18	21,602	NJ	21	30	NY	22	46	MN	23	343.20	OH	27	770.80	NJ	37	19.9	4
NC	20	20,379	ND	33	18	ND	23	45	NJ	26	315.50	MN	33	736.60	MN	41	40.2	3
CO	27	14,783	CO	40	13	CO	43	32	ND	27	313.80	NC	38	631.40	CA	48	26.2	0
ND	50	1,465	NC	45	10	NJ	47	27	NC	44	211.60	CO	43	554.40	OH	49	23.1	0

Source: Authors' analyses based on data from Administration for Children and Families and Center for Budget and Policy Priorities.

Note: FY = fiscal year; TANF = Temporary Assistance for Needy Families; WPR = work participation rate.

TABLE 11

County-Administered TANF States Ranked Nationally on Selected State Context Measures

Child Poverty Rate, 2012			Unemployment Rate, 2012 (Seasonally Adjusted)			State Population, July 1, 2013			Population Density 2010		
	US rank	%		US rank	%		US rank	Persons		US rank	Pop/sq. mile
NC	11	26.0	CA	2	10.46	CA	1	38,332,521	NJ	2	1,195.5
CA	19	23.8	NC	4	9.49	NY	3	19,651,127	NY	8	411.2
OH	20	23.8	NJ	5	9.49	OH	7	11,570,808	OH	11	282.3
NY	22	22.8	NY	14	8.49	NC	10	9,848,060	CA	12	239.1
CO	32	18.5	CO	20	8.01	NJ	11	8,899,339	NC	16	196.1
NJ	44	15.4	OH	27	7.18	MN	21	5,420,380	MN	32	66.6
MN	48	14.6	MN	43	5.64	CO	22	5,268,367	CO	38	48.5
ND	51	13.2	ND	51	3.11	ND	48	723,393	ND	48	9.7

Source: Authors' analyses based on data from Bureau of Labor Statistics, US Census Bureau, and American Communities Survey.

From a TANF recipient's perspective, the biggest difference between state- and county-administered programs is likely different work activities or access to support services depending on where the client lives within a state with a county-administered TANF program. In practice, within a state with a county-administered program, eligibility for cash assistance, benefit levels, nuanced differences in the treatment of income, how long they may remain on assistance, exemptions from participation in a work program, and sanctions for noncompliance are, if not identical, at least substantively the same. The same holds true for recipients in states with state-administered TANF programs. However, whether the recipient will be dealing with a county worker or someone employed by a contractor can and does vary widely within states, as do the employment activities and services offered. In county systems, access to special needs allowances such as assistance for work expenses or availability of emergency assistance could vary by county. In contrast, a TANF recipient in a state-administered state is more likely to encounter the same services and work activities anywhere in the state.

From an operations standpoint, especially that of local office managers or line workers, being employed in a county-administered system can mean salaries may differ across counties, as could responsibilities and even what assistance programs are covered. This includes business processes and how cases are assigned. In some states, the pay can differ markedly by county, creating financial pressures to relocate to another area in the state. Business processes and human resources decisions also vary among state-administered states, but not as frequently as counties with local administration.

Despite virtually no differences in the characteristics of states choosing county or state administration, or in the quantifiable outcomes of these programs, officials in states with county-administered TANF programs often hold strong beliefs in the value of county administration. They argue that local officials best know the needs of recipients in their communities and are better able to respond to local challenges. This is particularly true, said officials in states with county-administered programs, in states that are large or have a marked divide in the characteristics of certain counties, for example, a contrast of urban and rural counties or regions with concentrated wealth versus widespread poverty. "We believe that we know our communities better, and if we have that flexibility with how we spend our dollars we can figure out what's specific to our communities and we can partner… with nonprofits," an official from Colorado's El Paso County said. "If you're at the state level, you don't have that understanding."

Another primary benefit of county administration cited by respondents is an ability to respond to challenges and rise above what is perceived as a lumbering, inefficient central bureaucracy. "It allows for local control and ownership," a Minnesota state administrator said. "It is easier to move 87 small boats rather than one bigger ship." Having flexibility also means that local officials are better able to tailor how they enter into customized business relationships, such as contracting for services, based on local needs. Other benefits include insulating the program from potential changes during times of rapid state leadership changes or political gridlock, and the local accessibility of having a benefits office nearer to a recipient's community.

On the other hand, state and county officials in county-administered programs pointed to numerous challenges with county administration. Most notable, there can be, at times, a marked difference in the quality or consistency of services provided in a county system. As a TANF official in California's Stanislaus County said, recipients are dependent on the level of support for a program in the county where they live. By extension, to make certain changes statewide, it is necessary to gain the support of as many county boards or committees as there are in the state, as opposed to typically one central authority in a state-administered structure. By adding an extra administrative layer, local TANF administrators may sometimes feel that policy or program directives from the county, state, and federal levels are at odds with each other. "If I had a wish list, it would be that the state and federal rules jived a little bit more in tandem, and not necessarily working against each other," a Stanislaus County administrator said. Engaging in program monitoring and collecting and using data can also be more challenging in a county system. In addition to differences in how data are collected, data might be interpreted differently. An administrator in Minnesota's Hennepin County observed that in a county system, it may be more difficult for counties to collaborate or work together with state-provided resources, which ultimately can create policy silos from area to area. On the operations side, staffing challenges can arise from multiple directions. Counties can have a different perspective on the importance of customer service, further adding to an incongruous program experience for a TANF family from one county to another, a Minnesota state official said. Also, in a system where counties are often recruiting the same employees, competition can arise between areas for the same caseworkers, a Burleigh County, North Dakota, board members noted. Staff retention is a particular problem for some rural areas in the state or counties that might not have the same level of resources to match statewide average staff salaries. In addition, at least some county officials in North Dakota were concerned about losing their best employees to state government positions.

Technical Assistance Needs of County-Administered TANF Programs

County-administered TANF programs have a wide range of technical assistance needs, including many that are shared with state-administered TANF programs and some others that are unique to county-administered programs. Both state and county TANF administrators receive federal technical assistance and federally facilitated opportunities for peer learning, for which those interviewed expressed appreciation. County TANF administrators with the authority and responsibility to develop TANF policies, though, expressed a need for greater communication directly with federal TANF administrators and for technical assistance in implementing federal policies at the county level. Administrators of county TANF programs also strongly emphasized the value of peer learning among counties within a state or among states with county-administered TANF programs. Again, those interviewed expressed appreciation for the opportunities they already received as well as an eagerness for more. This section first describes the available federal technical assistance and the specific needs of county-administered TANF programs, and then describes the range of technical assistance needs identified by both state- and county-administered TANF programs.

The federal government offers a range of TANF-related training and technical assistance to states and counties. This assistance is provided through contracts with the Office of Family Assistance (OFA) and the Office of Planning, Research and Evaluation (OPRE) at HHS/ACF. Services include the following:

- The Self-Sufficiency Research Clearinghouse, launched in 2012, is an OPRE-funded virtual portal of research on topics relevant to low-income and TANF families.
- The Welfare Peer TA Network is an OFA-funded initiative for technical assistance and other resources for state, county, and tribal social service agencies providing TANF.
- The Online Work Readiness Assessment (OWRA) Tool is an OFA initiative for providing web-based resources to help facilitate client work readiness.
- The Rural Communities initiative provided ongoing technical assistance to 16 rural communities (including the state of North Dakota) between 2008 and 2011.

- The Urban Partnerships initiative provided ongoing technical assistance to 26 large urban areas (including Minneapolis, Denver, and three urban areas in California) between 2000 and 2007.
- The Promising Pathways initiative provided technical assistance to ten sites between 2011 and 2013.
- Regional Roundtables are held every year to fulfill technical assistance requests from states to their ACF Regional Program Managers.
- A special Welfare Peer TA Roundtable was held in July 2012 to explore the specific challenges of the state-supervised, county-administered structure. Minnesota led the request for this event.

State and county TANF administrators interviewed for this study mentioned how useful these resources are. A Colorado county TANF administrator said of the Welfare Peer TA Network's website, "That's a great opportunity…We have stuff on that website…I read it all the time." Another said the Welfare Peer TA Network's facilitation of state sharing makes, "a big difference." A state TANF administrator said of the Self-Sufficiency Research Clearinghouse, "I've seen so many examples where research is crystallized and simplified, and that's great." Minnesota TANF officials mentioned the technical assistance they received from the Peer TA Network on teen parents. A North Dakota TANF administrator said that through the Rural Communities Initiative, North Dakota developed a car donation program they modeled on another state's program, and "it benefitted a lot of people."

In addition to federally facilitated technical assistance and peer networking, counties and states with county-administered TANF programs also share information within and across their states, both formally and informally, through state associations, training, or contracts with universities. Many emphasized the need for even more information on best practices, which could be shared through websites, e-mails, magazine articles, peer-to-peer visits, or conferences. A Minnesota TANF administrator said it would be helpful to hear from other county-administered programs "how they turn this rig around" when trying to implement new policies or procedures. A Colorado county TANF administrator said, "folks are always hungry for what is already out there and what has been developed that we can go and visit or have them come out." There is recognition, however, that it is not possible to "cookie cutter" many solutions across states and counties. What works in one place might not work the same way elsewhere, especially given the variation among the county-administered TANF programs.

A number of county TANF administrators expressed an interest in receiving communication directly from federal TANF administrators, rather than depending on state administrators to convey the information. County administrators with some autonomy in implementing TANF may use information or seize federal opportunities separately from state administrators. One county TANF administrator said, "What I have seen is I think the feds do a good job of reaching out to states around that, but for some states you have to reach out to the county within the state."

A county TANF administrator in another state added, "There's a need to look at recognizing the role of counties maybe and in a more official way. Because we're so much more involved. We have quite a voice in a lot of the implementation, and we have opportunities with implementation...When it comes only through the state, we may not know about opportunities for innovation, and if they're not shared in a manner that's well understood by a vast majority of folks, maybe we don't get enough participation in those opportunities."

Along these lines, several county TANF administrators identified a need for technical assistance in navigating federal rules, including federal reporting of work participation components, categorizing spending for activities that serve more than one purpose, and complying with the new provisions for using debit cards. County TANF directors who have some direct responsibility for developing policies could benefit from expanded direct communication with federal TANF administrators.

Some county administrators also expressed interest in technical assistance in partnering and communicating with local business to boost economic development. In some smaller counties, TANF administrators are not only focused on the self-sufficiency of their clients but more broadly on the self-sufficiency of the community. One county TANF administrator noted that it was her "dream" that local business might choose to partner with the TANF program, and may have demand for a specifically trained workforce that the TANF program could provide. There is potential for technical assistance at the county level in engaging these local businesses as employers.

Other specific technical assistance needs raised by interviewees in county-administered TANF programs include the following:

- Assistance with screening tools
- Random moment time studies
- Staff training processes
- Management training

- Formulas for allocating funding to counties
- Business process design
- Connections between business processes and technology
- Data privacy
- Serving tribal members and other specific populations
- Integration with other social service programs
- Leveraging other resources
- Change management for county-administered systems

The study team also examined all the technical assistance requests to the federal government (HHS/OFA) through its training and technical assistance contracts, as well as question topics posted to the Welfare Peer TA Network from January 2011 to March 2014. Of the 17 requests, counties directly made three. In two other cases, states with county-administered TANF programs requested technical assistance on the topic of program administration, suggesting that the topic may relate directly to the program's county-administered structure. Table 12 lists the Welfare Peer TA Network topics and technical assistance requests posed directly by states with county-administered programs.

TABLE 12

Formal Technical Assistance Requests by County-Administered TANF Programs, January 2011 to March 2014

County-administered TANF states	Welfare Peer TA question and answer topics	Technical assistance request topics
California	TANF administration	
Colorado	Case management Job development, job placement and retention[a]	Caseload sizes[a]
Minnesota	Compliance and sanctions Teen parents	Teen parents TANF administration
North Dakota		Nonrecurring short-term benefits Diversion
New Jersey	Subsidized employment and work experience	Employment and training[a]
New York	Assessments	Job development staff training
Ohio	Child care Compliance and sanctions Job readiness	
North Carolina		

Source: Authors' analyses of information from the Welfare Peer TA Network.

[a] Technical assistance requested by county.

The technical assistance needs raised by state-administered TANF programs also vary widely. The research team asked the directors of 29 state-administered TANF programs whether they needed technical assistance in any of several specific technical assistance areas and also asked them to identify any other technical assistance topics that would benefit their programs. Among the specific technical assistance topics, each topic was selected by, at most, about one-quarter of states as an area of need for them (see table 13). Furthermore, only six states volunteered any additional technical assistance topics beyond those in the suggested list.

TABLE 13

Potential Technical Assistance Needs in 29 State-Administered Programs

Technical assistance topics	Number of states indicating need
Financial management and fiscal reporting	5
Communication	9
Policy	6
Information technology	8
Data management	10
Program monitoring	9
Service delivery	5
Training tools	10
Staff recruitment strategies	7
Staff retention strategies	9
Effective screening and assessment protocols	7

Source: Urban Institute analysis of survey responses from 29 states with state-administered TANF programs, December 2013 – March 2014.

While the technical assistance needs of state-administered and county-administered TANF programs overlap considerably, in general the technical assistance needs for county administered programs focus on the strategies, tools and information needed to support program implementation, where state technical assistance needs center on systems and policy change and implementation. Both county and state administrators participate in and use technical assistance provided by federal and state providers. It is evident that continuing to further target technical assistance efforts to address the issues of county-administered systems would strengthen the implementation of these programs.

Key Findings and Conclusions

While the "county-administered" label reveals very little about how a TANF program is administered, a few characteristics are common to all the county-administered TANF programs included in this study and set them apart from state-administered programs. First, county employees (not state employees) are the frontline workers determining eligibility and case management. Second, the counties contribute financially to the program. Third, county elected officials play some role in reviewing the local TANF budget, policy, or both. However, in Colorado and California county administration means much more. Counties in Colorado and California have considerable authority, flexibility, and responsibility for policy decisions, spending decisions, or financial contributions.

For families living in states with county-administered TANF programs, their experiences receiving TANF cash assistance depend on both their state and their county. A family's eligibility for TANF and the amount of cash assistance they receive depends almost entirely on their state of residence, not their county. The basic rules around eligibility and benefit levels vary by state but are applied uniformly across counties within each state. County-by-county differences in other aspects of a family's TANF experience, however, are greater in Colorado and California, which allow counties greater flexibility to shape their TANF programs, than in Minnesota and North Dakota or in states with state-administered TANF programs. In states with flexible county-administered TANF programs, a family might experience different specific work requirements or training opportunities, or even different rules for the living arrangements of teen parents, depending on the county in which they live. The positive relationships observed between some county TANF administrators and their communities suggest that family experiences in county-administered TANF programs are further shaped by the local resources that are available and by the ability of the TANF program to seize opportunities to create partnerships and provide access to community resources; however, this study did not examine the relationships that state-administered TANF programs have with their communities, for comparison. County flexibility to tailor TANF programs depends not only on the formal structure of state and county authority and responsibility but also on the practical ability of counties to act. When counties have fewer financial resources, such as during the recent recession, or if they lack the personnel and technical capacity to develop innovative programs, county-by-county differences are diminished, regardless of their formal authority.

As a whole, county-administered TANF programs look no different from state-administered TANF programs on major measures. County-administered programs are among the highest, the lowest, and average ranked TANF programs on the federal work participation rate, the share of poor families receiving TANF cash assistance, average earned income, average TANF benefit amount, and other measures. In addition, states with county-administered TANF programs are not systemically different from other states in terms of population size, political party, or other state characteristics. Although county or state administration of TANF is not systematically correlated with measured outcomes for families, both structures have proponents. Proponents of state TANF programs highlight the consistent support low-income families receive throughout the state. Proponents of county-administered TANF programs underscore the flexibility to adjust to local circumstances, culture, priorities, and perspectives. As all states continue to implement and revise their TANF programs, whether county-administered or state-administered, they each seek their own balance between providing consistent support for low-income families and adjusting to local circumstances. County administration of TANF appears to matter the most to the counties themselves. Even in North Dakota counties, where TANF program flexibility is very limited and the financial contribution is relatively large, the desire for county control is strong.

Regardless of the reasons for or results of county administration, the extent of county control and, by extension, the limits on state control are important for federal lawmakers and regulators to recognize. Governors and other state-level officials may not have direct authority to mandate specific actions at the county level. While states ultimately are responsible for complying with federal laws and regulations, and ensuring that their counties do also, the process of implementing federal policies in a state with a county-administered TANF program can be complex. Further, because county administrators in some states are directly implementing federal policies, technical assistance on these matters needs to be directed to county administrators as well as state officials in these states.

Appendix A. State-Administered TANF Programs Included in the Study

TABLE A.1

List of State-Administered TANF Programs Included in the Study

Alabama	Indiana	Nevada
Arizona	Iowa	Oregon
Arkansas	Kansas	Pennsylvania
Connecticut	Louisiana	South Carolina
Florida	Maryland	South Dakota
Georgia	Massachusetts	Tennessee
Hawaii	Michigan	Virginia
Idaho	Mississippi	Washington
Illinois	Missouri	West Virginia
	Montana	Wisconsin

Appendix B. Site Visit Interview Guide for State TANF Directors

STATE TANF DIRECTORS' INTERVIEW GUIDE

[Note: This guide is intended for respondents identified as State TANF Directors in County Administered/State Supervised states. Respondents will be familiar with the issues, complexities, and realities of County administered TANF programs.]

Date of Interview:

Interviewer (s):

State:

Respondent Name:

Title:

Respondent Affiliation:

E-Mail:

Phone:

Address:
Fax:

Introduction/Purpose of the study

Thank you for agreeing to participate in this interview today.

My name is _______________ and I'm a researcher from the [Urban Institute, a nonprofit research organization OR ICF International, a consulting firm] located in the Washington, DC, metropolitan area. With me today is [name and affiliation].

The Administration for Children and Families (ACF) Office of Planning, Research, and Evaluation (ACF/OPRE) is conducting a study of county-administered Temporary Assistance for Needy Families (TANF) programs. The study is not an audit or evaluation of any single program. Rather, the purpose of this study is to provide information about the way the program works; for example, we want to learn:

- What do county-administered TANF programs look like;
- How do county-administered TANF programs differ from state-administered TANF programs in terms of program implementation, operations, outputs, and outcomes; and
- Do county-administered TANF programs have unique technical assistance needs?

Privacy Statement *[Interviewer must read this]:*

This data collection effort is intended for the purpose of describing county-administered TANF programs' operations and needs, and comparing these with state-administered TANF programs. We will use what we learn today and from other interviews to contribute to a report to HHS and others interested in TANF programs. Our study began in October 2012 and will end in September 2014. Your participation is voluntary and your statements are private to the extent permitted by law. This interview is not part of an audit or a compliance review. Your comments will not affect the program's management or your involvement with the program.

We know that you are busy and will try to be as brief as possible. We have many questions and are going to talk to many different people, so please do not feel as though we expect you to be able to answer every question. Again, this interview is **not** part of an audit or a compliance review. We are interested in learning about your ideas, experiences, and opinions about TANF program administration. There are no right or wrong answers. We want to know what you think. If there are any questions you do not wish to answer, just let us know.

In addition, before we start, I want to let you know that although we will take notes during these interviews, information is never associated with your name or the name of any respondent in any report, discussions with supervisors or colleagues, or ACF/OPRE. When we write our reports and discuss the study findings, information from all informants is compiled and presented so that no one person is identified. However, although individuals will not be cited as sources, information will be presented in our reports that may enable a user to infer the identity of the information source.

[IF WE WOULD LIKE TO RECORD THIS SESSION:] We value the information you will share with us today and want to make sure we capture all of it. So, with your permission, we will be recording the session and/or [name of person] will be taking notes on a laptop computer. However, we will destroy the recordings as soon as we have made complete notes of the meeting. Do you have an objection for us to proceed with recording?

We have scheduled this meeting for 60 minutes. Is that still convenient? (If yes) Are you willing to participate in this interview?

Do you have any questions before we begin? If you have any questions during the interview, please do not hesitate to ask-- if something is not clear, just let me know. Okay?

[NOTE TO INTERVIEWER: The respondent's answers to individual questions may address subsequent questions. Subsequent questions may be skipped or probed as needed to gather complete information.]

I. Background and Context

1. Please describe your position/role in the state of _____________.

   (Probe: What is your job title? What are your responsibilities related to TANF? What are your overall responsibilities? How long have you held this role? In the past, did you have other positions in this department?)

2. We'll be getting into specifics shortly, but first I wanted to ask in your view, what are the benefits of managing TANF in a county-administered system?

   a. (Possible responses: reductions in regulations and federal oversight; ability to redesign welfare programs in more efficient/effective ways; counties are closer to the problems of residents; additional flexibility for service delivery; greater familiarity with capacity of local programs to serve those in need; more responsive to changing demographic trends; increased ability to innovate)

3. Conversely, are there any obstacles in your view to operating in a county-administered system? What about this arrangement is more challenging?

II. History of TANF Program Administration

I would like to ask some questions about the history of TANF program administration in your state.

1. From what you know, what was the historical role of county offices in providing welfare services?

   [NOTE TO INTERVIEWER: Probe, as needed: Is relationship a **continuation of administrative practices** prior to the implementation of PRWORA (i.e., AFDC)? Have there been **changes over time in the relationship**? Are relationships **clearly defined and outlined**, by state policies/procedures? How **autonomous** are county offices?]

2. Did the state have approved federal waivers to administer a more localized AFDC program? Can you describe some of the specific responsibilities of the county or local governing board during AFDC?

3. What, to the extent of your knowledge, were some of the major reasons why the state placed more functional and administrative responsibilities with the counties in the wake of PRWORA rather than maintain more state-level control?

   [NOTE TO INTERVIEWER: These reasons can be probed if the respondent has long term involvement with decisions regarding administering and implementing TANF:

   a. Reductions in regulations and federal government oversight

   b. Ability to redesign welfare programs in more efficient and effective ways

   c. Perception that counties are closer to the problems of residents

   d. Provide additional flexibility for services and service delivery

   e. Greater familiarity with capacity of local programs to serve those in need

   f. More responsive to changing demographic trends

   g. Increase ability at local level to innovate

   h. Greater capacity to engender public support for welfare reform

III. Financial Management and Fiscal Reporting

I would like to focus now on financial management and fiscal reporting responsibilities for your County administered TANF program.

1. First, could you explain broadly how your TANF program is financed, including federal TANF dollars, state dollars and county dollars? [NOTE TO INTERVIEWER: The respondent's answer may address subsequent questions in this section. Subsequent questions may be skipped or probed, as needed to gather complete information.]

2. The TANF block grant to the state has remained consistent over the last 15 plus years. What has been the experience on the state level—have funds allocated to the counties remained consistent with the 1997 levels?

3. How are funds allocated to the counties?

   a. Are the funding mechanisms different for administrative dollars and program dollars? If so, please explain how each type of funding is allocated to the counties.

   b. Does the state allocation of program or administrative funds vary year to year? Month to month?

   c. Are adjustments program funds based on the number of families served?

   d. Has there been any adjustment in county program or administrative funding levels due to the economic recession or state budget issues?

   e. Is funding tied to performance? If so, how?

f. What role does a county board of supervisors have in TANF funding and other financial decisions?

4. Does the State have a standard reporting process and protocol for counties to report expenditures—both cash and noncash assistance?

    a. How does that system work? How is the back and forth between the State and Counties handled?

    b. How often is data collected—monthly, less frequently, more frequently?

    c. Has the State established reporting metrics (e.g., expenditures per participant) for the counties?

    d. What communication vehicles are used between the state and counties? For example, is there a monthly newsletter or funding notification provided to the counties to keep them informed of changes in procedures?

5. There is a Maintenance of Effort (MOE) requirement for the drawdown of Federal TANF funds. Can you tell me a little about how that works in your State in relationship to the Counties?

    a. Is the MOE requirement met only by the state or is it passed down to the county level, requiring counties to meet MOE requirements?

6. Is there a set proportion of the federal funds that are reserved by the State for their use in administrative oversight, monitoring and reporting?

7. Does your state have a Solely State-Funded program(s) related to your TANF program? If so, are State dollars allocated to the counties for these programs?

    a. If so, how are these State dollars allocated to the counties (e.g., by caseload)?

    b. Is there a County match requirement for these programs? If so, what is the source for these funds?

8. What is the level of discretion that the State has in creating state-wide initiatives that are funded from Federal TANF resources?

9. When funds are used for TANF purposes 3 and 4 (reducing nonmarital childbearing and promoting two-parent families) are those allocation decisions made only at state level or also at the county level?

10. When funds are transferred to other programs, are those allocations decisions made only at the state level or also at the county level?

11. Does the state mandate to the counties any State-specific programming and set-aside allocation of funding for specific programs?

12. From your state perspective, have there been any challenges with the cost of administering TANF at the county level, especially during the economic crisis?

13. What technical assistance is needed regarding financing and fiscal reporting for county-administered TANF programs?

IV. State – County Bureaucratic Structure and Communication

Now I would like to get a general understanding of the **current relationship between the state government and county governments** in the administration of TANF, *before we delve into the specifics*.

1. Can you please give us a broad overview of how the state/county relationship is currently structured in your state with regard to TANF? From your perspective, how has this relationship changed over the 15 year implementation of PRWORA?

2. What are the general responsibilities of each level of government for managing and implementing TANF programs? (Potential areas: financial management, policy, administrative responsibilities, performance measurement, staff hiring, contracting for services)

   a. State responsibilities?

   b. County responsibilities?

   (Probe: Who, what position or governmental entity, is the point of contact for county responsibilities?)

3. We are interested in how these responsibilities are governed and where these entities derive their authority/responsibility. To what extent are responsibilities governed by:

   a. Federal policy?

   b. State legislative mandate?

   c. County rules/regulations?

   d. Are there other governing authorities or mandates (e.g., court orders)?

4. Is there a need for technical assistance to facilitate these relationships and/or communication? If so, please describe.

V. Policy Development

As we delve into more specifics, I would like to focus first on the roles of the state and counties in TANF policy development.

1. What policy decisions relating to TANF implementation are made at the state level and which are made at the county level?

   a. Determining eligibility requirements

   b. Determining asset and earned income disregards

   c. Setting benefit levels

   d. Determining appropriate work requirements

   e. Determining recipient sanctioning procedures and processes

f. Determining <u>time limits</u>

g. Establishing <u>family caps</u>

h. Determining <u>child support pass-through</u>

2. To what extent have counties' policy choices and priorities varied across the state?

    a. What influence do local constituencies, socioeconomic factors, metropolitan status, region, population changes, budgetary situations, demographics play on policy variations across the state?

3. How are TANF policy decisions communicated up and down the bureaucracy? In other words, how does the state communicate policy decisions to the counties and how do counties communicate policy decisions to the state? How does each entity communicate policy decisions to other stakeholders?

    a. Policy memos or summaries? Policy manuals or directives? Legislative concept proposals and memos? Committee reports or memos? Public speeches or public testimonies? Electronic mail or electronic bulletin boards? Executive or legislative briefings? Functional documents that require independent review, as opposed to proactive engagement (e.g., legislation, regulations, procedures, or agreements)? Regular data reports (e.g., hard copies or output to a data dashboard structure?)?

    b. Is there a single point of contact for communication surrounding policy?

4. At what level can decisions about privatization of services be made—state or county?

    a. Do counties have flexibility to create performance benchmarks and performance contracts for privatized services?

VI. IT and other resources available to counties

I would like to focus now on your technology systems and resources.

1. To what extent do counties share IT systems throughout the state? Are the systems statewide, or unique in each county, or used by subgroups of counties?

    a. How are shared systems managed (mainframe, web-based)?

    b. Is the system TANF only or connected with other programs (e.g., SNAP, Medicaid, Child Care)?

2. To what extent do counties share data systems throughout the state? Are the data systems statewide, or unique in each county, or used by subgroups of counties?

    a. How are shared data systems managed (mainframe, web-based)?

    b. Is the data system TANF only or connected with other programs (e.g., SNAP, Medicaid, Child Care)?

3. What IT technical assistance or support is available to counties from the state?

a. How often are these resources accessed? What works well in the system? What is challenging? What do you wish was different about the process?

4. From your perspective, do counties collaborate to stretch resources further?

    a. Is it a formalized or ad hoc process? What mechanisms exist for initiating or responding to a request? Is this data tracked?

5. What technical assistance needs exist at the state or county level with respect to support to mitigate challenges or problem-solving for IT solutions and more effective data management?

VII. Program Oversight and Monitoring

I would like to focus now on the program oversight and monitoring practices of your TANF program.

1. What performance monitoring systems are used by the state to oversee TANF?

2. What performance measures have been put into place?

3. How is program compliance ensured?

    a. What metrics are in place to ensure county compliance? How are those data collected? How is program quality defined and measured?

    b. What state supports are available to counties? How are errors addressed? What types of corrective action are used?

4. How does the state monitor participation in work activities?

    a. What happens in your State when a county does not meet its work participation rate?

    b. [For states that use performance measures beyond the WPR] Do counties monitor, or are counties held accountable, for any other measures beyond the WPR?

5. If the Federal government levies a penalty against the State, how does that penalty flow down to counties?

    a. Do responsible counties bear the entire penalty? How are those funds realized? What steps are taken to mitigate future errors?

6. From your perspective, what tools or resources would support improved performance for county-administered TANF programs?

    a. What TA efforts have been implemented in the past? What were the results? What were the lessons learned?

VIII. Service Delivery and Staffing

I would like to focus now on the service delivery practices of your program.

1. To what extent is there variation in the implementation of TANF services to clients across the state:

    a. In-take and access (e.g., same screening and assessment tool for determining eligibility? Making referrals? Program and service eligibility?)

    b. Service delivery (e.g., referral mechanisms and co-location of staff, on-site supports, job support service referrals, employment supports like child care referrals and transportation vouchers)

    c. Work supports (e.g., job club, job-readiness training, components of work support)

        i. What is the level of flexibility at the county level to define and implement work support programs

    d. Staffing and salaries (e.g., job descriptions and requirements, salary levels, training)

        i. What discretion do counties have in making staffing and caseload decisions?

        ii. How are caseload levels (staff: case ratios) determined?

            1. <u>State directed?</u>

            2. <u>County directed?</u>

        iii. Are qualifications and job descriptions determined at the state or county level?

        iv. Are hiring decisions made at the state or county level?

        v. Are salaries set at the state or county level?

    e. Generalist versus Specialist Worker (e.g., universal worker, TANF only, Medicaid only, SNAP only)

2. To what extent are service integration and cooperation between TANF and other work support programs (SNAP, child care, DOL-sponsored training) standardized across the state or unique to each county?

3. How seamless is the transition for families needing services as they move from one county to another? For example, does a family's case close, requiring them to reapply in their new county, or are cases transferred between counties?

4. From your perspective, what is the role of the state in ensuring effective case management of TANF families?

5. What technical assistance is needed to improve service delivery for TANF programs?

    a. On-boarding materials?
    b. Training tools?
    c. Recruitment strategies?
    d. Retention strategies?

e. Effective screening and assessment protocols?

IX. Other variation or technical assistance needs

1. Are there **any other differences** in how TANF programs are implemented **from county to county** that we haven't already discussed?

2. We have asked about specific technical assistance and support during this discussion. Are there **any other types of technical assistance** that that would benefit your program?

    a. (Recount earlier examples, probe for each area: Communication, policy, IT, monitoring, service delivery, OTHER?)

Thank you so much for sharing this information with us. This has been a great discussion and we are grateful for your time. Is there anything else you would like to share with us about your program?

If we have any follow-up questions as we write our report, may we contact you again?

Thank you.

Notes

1. Descriptions for these two states, New Jersey and North Carolina, are fully contained on pp. 57–61, rather than throughout the report.
2. Federal law requires states to engage at least half of all TANF families with a work-eligible individual in a specific set of work or work-related activities for at least a minimum number of hours each month, subject to adjustments based on caseload reduction and state spending. A state that does not meet this "work participation rate" requirement may lose part of its TANF block grant. See Hahn, Kassabian, and Zedlewski (2012).
3. In addition, PRWORA requires states to conduct a program "that provides assistance to needy families with (or expecting) children and provides parents with job preparation, work and support services to enable them to leave the program and become self-sufficient" (42 U.S.C. 602, Sec. 402(1)(a)(i)).
4. See appendix B for the semi-structured discussion guide used in interviews with state TANF directors, which were the most expansive discussions among the site visit interviews.
5. This report draws state TANF policy information from Huber, Kassabian, and Cohen (2014). At the time of this report, policy information as of July 2013 was the most recent available.
6. Clients are allotted 24 cumulative months to participate in the full array of CalWORKs welfare-to-work activities with no hourly core/noncore requirement. Once clients exhaust the 24 months, they are required to meet federal TANF work participation rate requirements. The state time limit for cash assistance is 48 months.
7. Maximum benefits are calculated assuming that the unit contains one adult and no children who are subject to a family cap, have no special needs, pay for shelter, and live in a high-cost area of the state.
8. Although the immediate outcome is the same as full suspension of a recipient's benefit, case closure adds administrative complexity once the family is again compliant because the family typically must reapply for assistance.
9. As explained in the Colorado State Board of Human Services' *Standards and Procedures Manual for Rule-Making*, "When the Colorado General Assembly creates a law, it may leave certain things to the Executive Branch's discretion to establish or further define…giving authority to the agency or rule-making body to further define requirements or establish more specific criteria. Through rules, agencies in the Executive Branch can elaborate on laws created by the legislature" (Colorado Department of Human Services 2002, 9) CDHS programs or stakeholders also may initiate rules in response to a "change in state department procedure, organization, or policy that is required or permitted by statute; or identification of a new need or previously unknown issue" (9). Regardless of who initiates the rule-making, "It is CDHS policy that programs identify stakeholders and involve them in the rule-making process" (16). For additional information, see Colorado Department of Human Services (2002).
10. According to the CWDA website, the association was established at the 1926 annual meeting of the California Conference of Social Work. This unofficial group of public welfare organizations, with a membership of 20 people, was originally called the Association of California's Executives of Public Welfare. The name was changed to the County Welfare Directors Association in 1943.
11. The Cal-Learn program assists pregnant and parenting teens who have not obtained a high school diploma or its equivalent to graduate and become self-sufficient.
12. According to Minnesota's State TANF Plan, "The goal of the [Family Home Visiting] program is to prevent child abuse and neglect, reduce juvenile delinquency, promote positive parenting and resiliency in children and promote family health and economic self-sufficiency" (p. 8).
13. For programs that receive federal reimbursement for administrative expenses, such as SNAP, the swap legislation meant counties were required to assign any share of administrative money they would have received as a reimbursement to the state.
14. The California State TANF Plan is available at California Department of Social Services, "TANF State Plan," accessed May 6, 2015, http://www.cdss.ca.gov/cdssweb/PG152.htm.

15. The index’s data sources include participant-submitted paystubs, the TANF eligibility system, and the Department of Employment and Economic Development. See Hahn and Loprest (2011).

16. Most of the data were collected through phone interviews. A small number of states chose to enter responses directly into a survey form that was substantively identical to the interview questions. Not all states responded to every question.

17. For more information on outcome-based performance measures, see Hahn and Loprest (2011).

References

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Statement of Independence