



CWDA County Welfare Directors Association of California

Frank J. Mecca, Executive Director
925 L Street, Suite 1405
Sacramento, CA 95814
(916) 443-1749

Washington Office
Craig Associates
Pat Craig
(202) 466-0001

CWDA Comment on the Senate Finance Chairman's Mark

The Chairman's Mark on TANF Reauthorization released on September 8, 2003, improves on the House-passed H.R. 4 in a number of ways. In general, the mark provides greater flexibility for states and counties to assist TANF recipients toward self-sufficiency in a manner that meets the needs of individual families. We have the following specific comments on the mark.

Countable Work Activities. We appreciate that the mark maintains the current core activities and adds five activities that can be engaged in full-time for up to three months in any 24-month period. In the context of higher participation rates and the significant costs for services that will be required in order to engage more recipients for a greater number of hours per week, counties need additional flexibility. Specifically, we ask that the committee:

- Allow states to extend the five barrier removal activities for an additional three months, on a case-by-case basis, for a total of six months in a 24 month period. Effective barrier removal programs typically require more than three months of treatment or participation on an intensive basis.
- Allow up to 24 months of vocational education and training.
- Allow states to count postsecondary education as a core or secondary activity for up to 10 percent of the caseload.

Universal Engagement. The universal engagement provisions in the chairman's mark would hinder the work-first approach used by many states and counties. Counties that use an upfront test of the labor market via job search could at the same time be required to assess and create a plan to address the family's barriers, child well-being, and other service needs. Because a substantial percentage of recipients are able to find employment via job search, however, the in-depth assessment is more appropriately required 60 days *after the completion* of any job search activities. For participants who are still unemployed after job search, program staff typically have gained critical information regarding their employability, barriers to employment, and other needs that can be addressed in their self sufficiency plans.

Further, states failing to "substantially comply" with the universal engagement provisions face new, separate penalties. Most other state obligations under TANF are not linked to

penalties; for the most part, these obligations are required to be addressed in the states' TANF plans. Likewise, we believe that the universal engagement provision is best addressed as a state plan requirement without a separate penalty.

Hours of Participation. The move to a tiered system of credit makes sense, and we appreciate the chairman's willingness to extend the special rule for single parents with a child under six, similar to current law. However, we urge the committee to provide full credit for participation at 30-32 hours per week for single parents with a child over age six as well as for all two-parent families, and to provide extra credit for those exceeding the minimum number of hours. California now requires 32 hours of participation per week for adult recipients, exceeding the 30-hour requirement in the 1996 TANF law. Counties have found that a 32-hour participation requirement is an appropriate equivalent to full-time work for recipients with significant parental responsibilities and multiple issues to overcome before they can achieve self-sufficiency.

TANF and Child Care Funding. We urge the Senate to provide additional funding for TANF services and child care. The non-partisan California Legislative Analyst's Office estimated that the House bill requirements would cost about \$2.2 billion over the next five federal fiscal years in California alone. The \$1 billion provided nationally over five years will pay only a fraction of California's increased costs.

Exemptions for Children Under 1 Year of Age. The mark permits states to exclude families with a child under age 1 from work requirements and from calculations of work participation rates, on a case-by-case basis. We appreciate this flexibility, but note that states' ability to implement the exemption will be greatly limited by the 12-month lifetime limit for participants receiving this exemption. This limit will be extremely difficult, if not impossible, to track. We have found that TANF recipients are relatively mobile, often moving from one county to another or from one state to another.

Health Care for Immigrants. States should be allowed to provide federally funded Medicaid and SCHIP benefits to newly arrived immigrant children and pregnant women.

Thank you for your consideration of our comments. We appreciate the opportunity to be heard on this issue, which is of such importance to the vulnerable children and families in our communities. Please contact us at the numbers below if you have any questions.

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Contact: Pat Craig, 202-466-0001

Cathy Senderling, 916-443-1749