

Temporary Family Assistance During COVID-19

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Issue

Describe changes to Temporary Family Assistance (TFA) and Temporary Assistance for Needy Families (TANF) implemented in response to the COVID-19 pandemic.

Summary

Temporary Family Assistance (TFA) is Connecticut's cash assistance program for families. The federal Temporary Assistance for Needy Families (TANF) block grant funds TFA, as well as other programs related to poverty reduction, child welfare, and job training. (For more information on TFA and TANF, see OLR Report [2020-R-0150](#).)

In response to the COVID-19 pandemic, the Administration for Children and Families (ACF) within the U.S. Department of Health and Human Services (HHS) released guidance to states on March 24. The guidance describes TANF program flexibility to assist families during the pandemic, actions states can take to assist current assistance recipients, and work participation rate requirements for states. Among other things, ACF suggests issuing non-recurrent, short-term benefits; streamlining application processes; and granting good-cause exemptions for assistance recipients who fail to meet work requirements during the pandemic. According to ACF, there are no additional TANF funds available to address COVID-19.

In Connecticut, several of the governor's COVID-19 executive orders address TFA and other public assistance programs. Among other things, the orders allow the Department of Social Services' (DSS) commissioner to waive certain requirements and exempt benefits distributed during the

emergency from the state's 21-month statutory limit. DSS has extended TFA benefits set to expire in March and April through June and July, respectively.

Federal Guidance

According to [federal guidance published March 24](#) by ACF, there are no additional federal TANF funds for states to address needs caused by the COVID-19 pandemic.

The guidance provides examples of how states can use TANF to assist families affected by the pandemic, including issuing non-recurrent, short-term benefits (NRST), designed to deal with a specific crisis situation or episode of need for up to four months. ACF notes that NRSTs do not trigger TANF requirements associated with ongoing cash assistance (e.g., work requirements and time limits), and as such, states may find them less administratively burdensome ([45 CFR § 260.31\(b\)](#)). However, as there are no new TANF funds allocated to states, any NRST issued would presumably have to be funded with existing funds.

ACF also describes how states can alter their TANF procedures to better serve those currently receiving assistance. Options include the following:

1. streamline the application process to expedite eligibility and payment determinations;
2. offer online or telephonic applications to minimize face-to-face contact;
3. grant good-cause exemptions from work requirements for TANF participants who cannot go to work or training activities because they are sick, or because work or day care is closed;
4. provide opportunities to meet work activity requirements virtually (e.g., online trainings);
5. increase cash benefit levels for TANF cash assistance recipients who have reduced income or increased needs related to pandemic;
6. provide case management electronically or over the phone; and
7. exercise flexibility when meeting certain income and eligibility verification requirements.

The guidance also addresses the concern that states may not be able to meet required work participation rates during the emergency. By law, for TANF-funded cash assistance, states must meet federal work participation standards, which generally require that some portion of the caseload participate in specified work-related activities for a minimum number of hours. According to ACF, the office lacks the authority to waive work participation rates, but it can grant relief from resulting penalties in the face of natural disasters (i.e., a reasonable cause exemption) and intends to do so to the maximum extent possible. ACF cites federal regulations that allow states to claim

reasonable cause for failing to meet work participation rates during natural disasters and other calamities whose disruptive impact was so significant as to cause the state's failure to meet the standard ([45 CFR § 262.5](#)).

State Actions

Executive Orders

Several provisions of the governor's COVID-19 executive orders affect Connecticut's TFA program.

By law, DSS must perform an initial assessment of those found eligible for TFA in order to create an employment plan ([CGS § 17b-689c](#)). Adult TFA recipients who are not exempt from work requirements must generally seek and retain employment if it is available ([Connecticut TANF State Plan, page 6](#)).

[Executive Order 7B](#), § 5, issued March 14, authorizes the DSS commissioner to waive the requirement that TFA applicants attend an employment services interview and participate in developing an employment service plan before receiving assistance. It also authorizes her to consider the COVID-19 pandemic's effects and responses to it as good cause when assessing TFA participants' compliance with program requirements.

While federal law generally applies a 60-month time limit for receiving TANF-funded cash assistance, Connecticut applies a 21-month limit but allows households to apply for 6-month extensions. [Executive Order 7N](#), § 6, issued March 26, excludes TFA cash benefits received during the declared emergencies from the statutory 21-month time limit.

Other provisions apply more broadly to public assistance, including TFA. They include the following:

1. [Executive Order 7E](#), §§ 4 & 5, issued March 17, authorizes the DSS commissioner to (a) temporarily suspend recoupment of non-fraudulent overpayment of public assistance program benefits to the extent permitted by federal law and (b) suspend in-person requirements for fair hearings;
2. [Executive Order 7I](#), § 1, issued March 21, authorizes the DSS commissioner to suspend or extend time frames for eligibility redeterminations, to the extent federal law allows; and
3. [Executive Order 7CC](#), § 3, issued April 21, excludes stimulus payments received under the federal CARES Act from eligibility and benefit calculations.

Department Actions

According to DSS, TFA benefits scheduled to end in March or April 2020 have been automatically continued through June and July, respectively. To protect applicants and department staff, DSS has suspended in-person visits to field offices, but TFA recipients and applicants can access information online or by phone (see [DSS website](#) for more information).

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