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The EMPOWERED study, conducted on behalf of the ASPE at the U.S. Department of Health and Human Services, examines the use of performance measures, work requirements, and child support cooperation requirements across human services programs. This issue brief examines key findings on administering work-related requirements and work supports across three human service programs: (1) TANF, (2) SNAP, and (3) public housing. The study's findings are based on a national scan of policies related to work requirements, discussions with federal program administrators, site visit interviews with state and local program administrators and staff in three states (Georgia, Nevada, South Dakota), and aggregate administrative data on program participation collected from federal agencies.

# Issue BRIEF

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## Administering Work-Related Requirements Across Human Services Programs: Service Delivery Approaches

Based on discussions with state and local administrators and workforce development partners in three states, the study found two primary approaches for providing employment-related services to participants to help them meet the work-related requirements of Temporary Assistance for Needy Families (TANF), the Supplemental Nutrition Assistance Program (SNAP), and the public housing program. The following highlights describe lessons learned from these approaches:

- The human services programs visited for this study use two approaches: (1) in-house service delivery, whereby human services program staff provide employment and training-related services directly to program participants, and (2) contracted service delivery, whereby employment and training-related services are delivered solely by providers outside of the human services agencies, such as the public workforce system or community-based providers.
- The two approaches present key trade-offs related to service provision to fulfill work requirements, such as the extent to which services are quickly adaptable to emerging participant needs; the extent to which burden is placed on the participant to access, document, and maintain compliance with services that fulfill their work requirement; and staff capacity and resources.
- The type of service delivery approach used by human services programs to implement work-related requirements varied across the study programs and states and was shaped by program mission, such as the extent to which work requirements or helping participants find employment were a focus of the program, work-requirement policies, and resource constraints.

Low-income people and households often qualify for multiple human services programs that are funded, regulated, and administered by different federal agencies, each with its own eligibility criteria and program requirements. Policies requiring individuals to become employed or to participate in community service, work, education, or training activities have been in place in many human services programs for decades. Renewed attention in recent years from federal and state governments in how human services programs can better promote self-sufficiency has prompted interest in expanding the use of work requirements to other programs, and greater consideration of

how programs with work-related requirements implement them.

This brief examines the approaches of three human services programs—TANF, SNAP, and public housing—to providing employment and training-related activities and services to help participants meet TANF's work requirement policies, SNAP's mandatory Employment and Training (E&T) program, and public housing's Community Service and Self-Sufficiency Requirement (CSSR).<sup>1</sup> Table 1 provides an overview of key dimensions of work requirements in these programs.

DECEMBER 2019

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**Table 1. Overview of participant work requirements in TANF, SNAP, and public housing**

<p><b>What is required?</b></p>	<div data-bbox="337 285 407 380"> </div> <p><b>TANF:</b> TANF requires work-related activities for a state-specified number of hours per week, generally 30 hours per week for all families (20 hours if a single parent is caring for a child under age 6) and 35 hours for two-parent families (or 55 hours if they receive federally subsidized child care assistance).<sup>a</sup></p> <hr/> <div data-bbox="337 468 407 562"> </div> <p><b>SNAP:</b> SNAP has three relevant policies: (1) Most adults (called work registrants) must register in an employment system and accept a job if offered; (2) a subpopulation of work registrants who are able-bodied adults without dependents must work or participate in work-related activities for 20 hours per week; and (3) in 17 states, work-related activities and part of the state's SNAP E&amp;T program are mandatory for up to 30 hours per week for some populations.</p> <hr/> <div data-bbox="337 678 407 772"> </div> <p><b>Public housing:</b> Local public housing authorities require a minimum of eight hours in community service or work-related activities per month. Some public housing authorities also use employment preferences at application or to remain in housing. This means that if someone in the household is employed, the public housing authorities will put the household higher on the waiting list for housing or that someone in the household must be employed after obtaining assistance to remain in housing.</p>
<p><b>Who is exempt?</b></p>	<div data-bbox="337 835 407 930"> </div> <p><b>TANF:</b> Single parents caring for a child younger than 1 year old or caring for a disabled family member are not subject to work requirements federally; other state-specified groups are exempted at states' discretion.<sup>b</sup></p> <hr/> <div data-bbox="337 972 407 1066"> </div> <p><b>SNAP:</b> People who care for children younger than 6 years old or a disabled family member, have a disability, are elderly, are in substance abuse treatment, or are enrolled in education are not subject to work requirements; other state-specified groups are also not subject to work requirements.</p> <hr/> <div data-bbox="337 1119 407 1213"> </div> <p><b>Public housing:</b> People who are elderly, care for a disabled person, participate in specified work activities, participate in another state-supported welfare-to-work program including SNAP, or have a disability are not subject to work requirements; other state-specified groups are also not subject to work requirements.</p>
<p><b>What are the penalties?</b></p>	<div data-bbox="337 1289 407 1383"> </div> <p><b>TANF:</b> States determine sanctions, which range from a partial or full benefit loss for one month to permanent loss of benefits. In general, the severity of the sanction increases with each occurrence of noncompliance.</p> <hr/> <div data-bbox="337 1425 407 1520"> </div> <p><b>SNAP:</b> States determine sanctions within federal guidelines; these range from the recommended federal minimum of an individual's loss of benefits for one month to the individual's permanent loss of benefits. Most states increase the severity of the sanction with each occurrence of noncompliance.</p> <hr/> <div data-bbox="337 1572 407 1667"> </div> <p><b>Public housing:</b> Federal guidance requires public housing authorities to refuse renewal of the lease at the end of the 12-month term for failure to comply with the Community Service and Self-Sufficiency Requirement.</p>

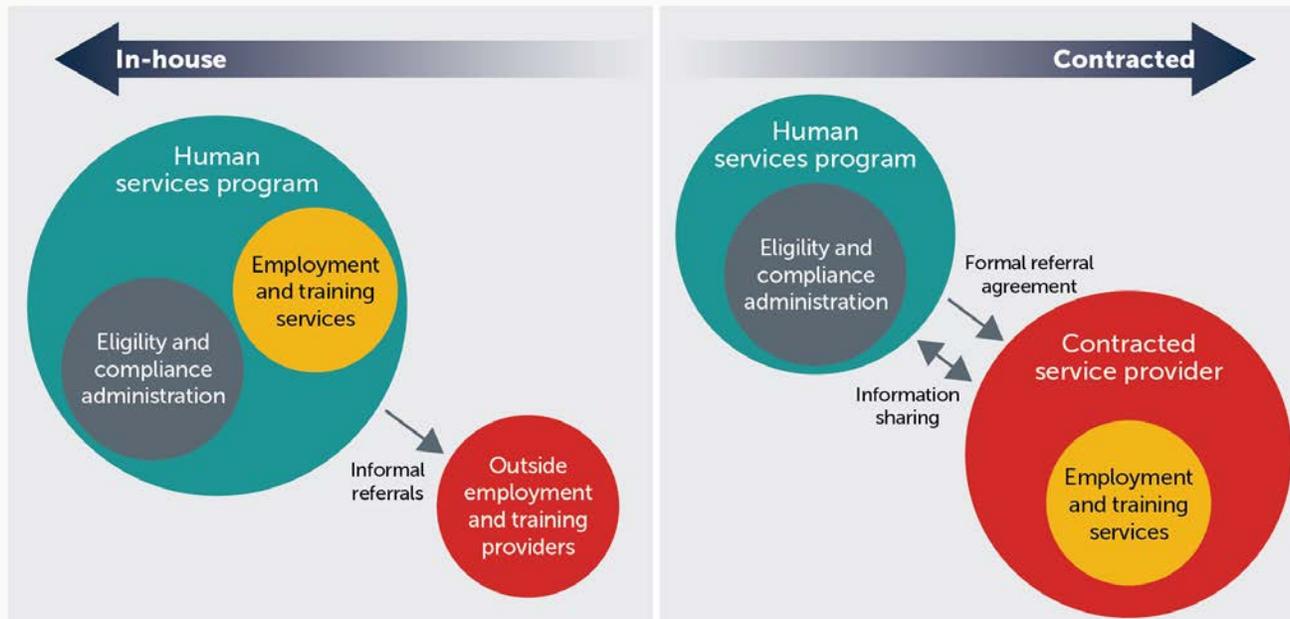
Source: Scan of publicly available documents, data, and reports conducted by Mathematica, November 2017–January 2018.

<sup>a</sup> States can only count participants who meet minimum federal guidelines toward the state's required work participation rate. States might require individual participants to do more or less than the federal guidelines, but states can meet their state work requirement only by counting participants according to federal guidelines.

<sup>b</sup> TANF technically considers people not subject to work requirements to be not work eligible or disregarded from the work participation rate calculation rather than exempt from the requirements. We use the term exempt to be consistent with terms used in other programs. States can choose to exempt other groups, but they will count toward the work participation rate.

E&T = employment and training; SNAP = Supplemental Nutrition Assistance Program; TANF = Temporary Assistance for Needy Families; PHA = public housing authority.

**Figure 1. Human services programs' employment and training service delivery approaches**



Although the study sites visited generally use only one approach to deliver employment and training-related services, human services programs may adopt an approach somewhere between fully in-house or fully contracted. For example, in one study site, a public housing authority (PHA) was operating a demonstration (not included in the study analysis) that provided some employment and training-related services in-house and had formal agreements with outside providers to provide other services. PHA staff provide work-readiness, soft-skills training, and job search assistance in-house and refer to contracted providers for vocational training or education.

The study selected these programs and policies because they require individuals who are able to work to participate in employment or employment-related activities—such as job search, training, subsidized or unsubsidized employment, or community service—and because not meeting this requirement results in a consequence (a loss of benefits). Other human services and workforce programs offer these types of employment-oriented services, but they are provided to eligible individuals on a voluntary basis, and failure to participate does not result in a sanction for noncompliance.

Human services programs have wide latitude to determine how they will help individuals meet their work-related requirements. Although federal agencies provide guidance about what types of employment and training-related activities or services programs can offer to meet a work requirement, states or localities have discretion in what services to deliver and how to deliver them.

To understand how human services programs implement work-related requirements, the study team conducted site visits to TANF, SNAP, and public housing program sites in three states. Although study states were not selected for variation in their approach to delivering

employment and training-related services<sup>ii</sup>, the study team observed key differences in how study sites provide services to participants. Study sites tend to approach employment-related service delivery in one of two ways: (1) in-house service delivery, in which employment and training-related services are provided solely by the human services program with little to no coordination with outside services providers, or (2) contracted service delivery, in which employment and training-related services are provided solely by outside providers that have a formal (often contractual) relationship with the human services program.

Although the study identified just two broad approaches to services delivery, Figure 1 shows that these approaches fall on either end of a spectrum, with potential for variation on these two models in between. Figure 2 shows the service delivery approach that each human services program in the study states use. The service delivery approach varies both by human services program and state. Within a state, different models are sometimes used for the same program depending on the needs of participants and resources available in local areas. The remainder of this brief describes these two service approaches in more detail and discusses trade-offs between them and considerations for implementing work requirement policies using these approaches.

**Examples of employment-related activities offered in-house:**

Work-readiness classes, life skills training, networking and interview workshops, resume workshops, job search assistance, self-directed job search, work or community service experience



Scholarships or payments for training



Barrier-reduction activities, such as counseling; case management; and child care, transportation, or housing stabilization

**Examples of employment-related activities offered through referrals:**

Work or community service experience, job search assistance



Basic education/GED preparation, vocational training, or education



Substance abuse treatment, mental health services, domestic violence services



**SERVICE DELIVERY APPROACHES**

**Approach 1: In-house service delivery**

Some TANF and SNAP study sites, and most public housing sites visited, provide employment and training-related services directly to program participants to help fulfill their work requirements. In these programs, human services program staff screen for and administer benefits, provide employment and training-related services and supportive services, monitor compliance, and implement penalties for noncompliance. Often the services that are offered in-house focus on searching for jobs or preparing participants for employment—through activities such as removing barriers to work, building work-readiness skills, and gaining work experience—rather than providing education or job training.

For example, Nevada’s TANF program matches individuals to tiered activities based on their readiness for employment. In-house activities can range from family stabilization with licensed social workers at the program, to a work-readiness class developed and delivered by TANF staff, to job search assistance with TANF staff who can help participants access the state’s One-Stop Career Center jobs database. Nevada’s SNAP program offers a more limited set of services in-house, including a job club and self-directed job search. In both programs, staff who deliver employment-related services also administer benefits for participants or are in close contact with benefits staff.

In an in-house approach, some study sites also offer limited referrals to outside providers for more intensive employment or training services than the program is equipped to provide. Referrals are either an option for participants to fulfill their work requirement or a supplement to the services provided in-house. Study sites do not have formal agreements with these outside providers to serve their participants. There generally is little to no coordination between those providers and the human services program regarding the needs of participants, services that would fulfill their work requirements, or whether participants receive services. Individuals seeking services from these organizations must qualify for them, like anyone else in the community. Individuals are likely to receive a standard set of services; that is, the services offered to them are not tailored to the work

**Figure 2. Human services programs, by state visited and service delivery approach**

	In-house service delivery <sup>a</sup>	Contracted service delivery
Georgia		 
Nevada	  	
South Dakota	 	 

Source: Site visit interviews with state and local program administrators and frontline staff in three states (Georgia, Nevada, South Dakota), conducted by Mathematica, January 2019–February 2019.

Note: Within a state, some programs use different models to meet the needs of different populations and due to capacity constraints at different locations around the state. This condition is indicated by the same program appearing in multiple columns within a state in this table.

<sup>a</sup>One public housing authority (PHA) in Georgia employs a combined service delivery approach that uses both in-house service delivery and formal agreements with outside providers. This PHA is a Moving to Work demonstration site in which residents fulfilled the Community Service and Self-Sufficiency Requirement (CSSR) by participating in an employment program created as part of Moving to Work. Findings from Moving to Work demonstrations were not included in the study analysis and may not be generalizable to non-Moving to Work PHAs.

requirements or allowable activities of the human services program from which they were referred. If individuals do obtain services from another organization, they often are responsible for documenting activities that fulfill their work requirement. For example, Nevada’s SNAP program provides some referrals to the public workforce system for participants who want

**Examples of employment-related activities offered through contracted outside providers:**

Self-directed job search, work or community service experience, job clubs, job search assistance, interview preparation, resume assistance or workshops, career coaching, soft skills training, subsidized employment, job placements, on-the-job training, employment.



Vocational training or education, basic education/GED preparation, technical skills certifications



Time-limited barrier reduction activities, such as child care, transportation, or housing stabilization



additional services, but the two organizations do not communicate with each other. The participant is responsible for providing the SNAP program with documentation of the job searches they conducted at the workforce agency to meet the work requirement.

**Approach 2: Contracted service delivery**

Some TANF and SNAP study sites provide employment-related services solely through outside providers. The human services programs screen participants for eligibility and refer eligible participants with a work requirement directly to an outside service provider. Providers have a formal agreement with the human services program—generally through contracts or memoranda of understanding (MOUs)—to provide participants with tailored services to meet their work requirements. Human services programs and outside providers split other functions to varying degrees, such as assessing participant needs, monitoring compliance, and providing supportive services (for example, transportation, child care, and materials needed for employment or training), though human services programs are always responsible for implementing penalties for noncompliance. Study sites primarily use two types of outside providers:

- A. The **public workforce system**, which provides employment and training services to job seekers in local career centers and assists employers with finding qualified applicants. For example in South Dakota, SNAP and TANF applicants<sup>iii</sup> who are deemed eligible for benefits and able to work are referred directly to public workforce offices for assessment, tailored employment-related services, and supportive services to access and maintain employment. Workforce staff monitor compliance and report to program staff, who implement penalties, if necessary.
- B. **Community-based providers**, which each have different missions, goals, and services offerings, provide a range of workforce services to the community. Human services programs might work with one community provider or many different providers. Providers monitor participant compliance and report to human services program staff, who confirm compliance or implement penalties. Staff in programs that work with multiple providers coordinate with all the providers serving participants in their caseload about participant compliance.

For example, Georgia’s SNAP program refers applicants eligible for benefits and able to work directly to staff at Goodwill Industries, a nonprofit serving communities through the state. Goodwill assesses individuals’ needs and then provides allowable employment and training-related services. Goodwill staff monitor participant compliance and report to human services program staff, who implement penalties, if necessary.

The services offered through a contracted approach tend to focus on intensive job search or preparation, vocational training, or work experience. For example, in South Dakota’s TANF program, which provides employment and training-related services through the public workforce system, services include vocational training, subsidized employment, and work experience, as well as job search assistance and work-readiness training. Outside providers vary in how much they connect individuals to services that are outside of the formal agreement with the human services program. In South Dakota, individuals are often introduced to programs in other funding streams, such as vocational training funded through the Workforce Innovation and Opportunity Act (WIOA), which they can access in addition to allowable activities, or, in some cases, to meet their work requirements. Some service providers in Georgia’s TANF program, which works with many community-based providers in a local area, reported feeling restricted by the contracts with human services programs; they were unable to offer individuals from these programs the robust array of wraparound services available at their organizations.

Although all of the study sites with contracted service delivery had some form of information sharing between outside providers and the human services program, a formal agreement does not guarantee strong communication and coordination between organizations. Respondents cited issues at the program, organizational, and staff levels.

- At the program level, human services programs and outside providers often have different missions that can lead to agencies working at cross-purposes. For example, in study sites that partnered with the public workforce system, workforce agencies were more focused on job readiness and employment, and human services programs were more focused on providing

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benefit assistance and supportive services. Misalignment can lead to issues coordinating which services to provide to participants, such as whether services should focus first on immediate job search or barrier removal and skill building, and differences in recommending penalties for noncompliance, as workforce staff may be more accustomed to working with individuals who want their services rather than individuals who are mandated to be there and may need more support to meet their work requirement.

- At the organizational level, some programs and outside providers lack a mechanism for ongoing communication and timely sharing of information about emerging participant needs and developing potential solutions or service offerings to meet those needs.
- At the staff level, human services programs and outside provider staff each discussed challenges with communicating about participants. These communication and coordination challenges can affect participant services. In programs that do not have strong coordination between organizations, sometimes due to insufficient capacity and staffing, participants may not find their way to a service provider. For example, in South Dakota, SNAP program staff do not communicate with the public workforce agency to provide a “warm referral” to the workforce agency, but instead provide a list of mandatory participants, which the provider uses to send a notice to participants. The participant must call and schedule an appointment. This process often results in few participants ultimately going to the workforce agency.

### **TRADE-OFFS IN APPROACHES TO SERVICE DELIVERYS**

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The study identified key trade-offs between providing employment and training-related services in-house or through a contracted provider, including trade-offs related to service provision, participant burden, and staff capacity.

**Service provision to fulfill work requirements.** Human services programs using an in-house approach can provide streamlined access to employment and benefit services in one location, potentially making it easier for participants to meet their work requirements and maintain their benefits. In a contracted approach, participants work with two organizations and sets

of staff, often in different locations. In-house programs can quickly modify service offerings, as they do not need to coordinate with another agency, renegotiate a contract, or find a new provider that can offer a new or different service. However, human services program staff may lack experience in the education and workforce field, and may be less knowledgeable about education, employment, or training opportunities available in the community. Therefore, human services staff may be less adept at connecting participants to those opportunities. In a contracted model, outside provider staff are more likely to be knowledgeable and experienced in the education and workforce field in which they operate. Outside provider staff can help participants access other services at the provider, which may be supported through funding streams unrelated to the referring human services program, in addition to allowable services that meet their work requirements.

In both approaches, the types of activities staff delivering employment and training services can offer may be constrained by program policies, contracts, or funding. In an in-house approach, program staff can be constrained in their ability to offer education or training as an activity, as direct training is often not provided in-house. Some respondents also reported being less knowledgeable or able to learn about other opportunities in the community that are not the main program focus. Therefore, services in an in-house approach may focus more on job search than education or training. In a contracted approach, provider staff delivering employment and training services may be constrained by the activities they are allowed to provide under a contract or MOU with the human services program, and adjusting services may require negotiating a new contract.

**Participant burden to access, document, and maintain compliance in allowable services.** In an in-house approach, the participant is often responsible for following through on any referral made to an outside service provider, documenting allowable activities, and bringing documentation back to the human services program. In a contracted approach, when there is strong information sharing between the outside provider and the human services program, the burden of following up on the referral and documenting compliance is reduced for the participant. In addition, participants are directed into tailored activities that meet the requirements

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of their referring program. Therefore, participants and program staff can be confident that the time spent at the outside provider will fulfill the program's requirements for participation, which eases the tracking of allowable activities and reduces the potential for noncompliance.

In an in-house approach, human services program staff can help participants maintain compliance with work requirements by quickly adjusting activities or making appropriate "good cause" or exemption determinations. Because program staff are in frequent contact with participants, they are more knowledgeable about their needs, circumstances, and exemption policies. This process can be challenging in a contracted approach, in which staff at two organizations split the responsibilities of monitoring compliance and implementing penalties. Weak coordination between organizations can also lead to delays in addressing participant barriers; for example, participants may not disclose an issue, or program staff may not uncover major barriers to participation before the referral; participants must then return to the program, or may require substantial barrier removal assistance that the provider is not well-equipped to offer.

**Staff capacity and resources.** In both models, organizations need adequate staff resources to monitor compliance with work requirements. In an in-house model, human services program staff have sole responsibility for providing employment and training-related services and for monitoring compliance, and they often do not have time to address both effectively. In a contracted model, the workload may be distributed between two organizations, requiring less time from the human services program, though both types of staff need adequate time to fulfill their respective roles, and coordination can require additional resources.

## CONSIDERATIONS FOR IMPLEMENTING SERVICES TO FULFILL WORK REQUIREMENTS

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In light of renewed interest in work-related requirements as a mechanism to promote self-sufficiency, the findings from this study are relevant for policymakers and program administrators at the federal, state, and local levels who are considering new or different approaches to service delivery within programs

that currently have work requirements, or adding work requirements to programs that do not currently have them. Although many factors influence service delivery approaches, the combination of a program mission, work requirement policies, and resource constraints were particularly important in shaping the service delivery model used by the human services programs in the study sites and are factors for other programs to consider when implementing work-related requirements.

**Program mission.** Program mission often defines and shapes the kinds of services that are offered and how they are delivered. Programs with missions that do not focus on increasing self-sufficiency may supplement their basic menu of services with some employment-related services provided through an in-house approach. For example, most of the study public housing authorities (PHAs) describe their mission as providing safe, affordable housing—unrelated to employment—and provide limited services in-house related to employment. Programs that use a contracted service delivery approach reported some conflict between the goals or missions of human services programs and outside employment service providers. For example, human services programs often are focused on providing services to help meet a range of individual and family needs, while workforce programs generally focus on helping participants obtain and maintain employment. These two missions do not always align.

**Work requirement policies.** Work requirement policies often drive the types of activities human services programs can offer, which in turn influence the service delivery approach that programs implement. Programs that prescribe a limited set of allowable activities tend to constrain the types of services provided and the use of outside providers. Policies about compliance monitoring and implementing penalties also influence coordination with outside providers. For example, public housing policies provide little specificity about how PHAs should monitor compliance with the CSSR, and the study PHAs largely do not coordinate with outside providers to document compliance. Conversely, TANF programs often had very specific monitoring procedures, and study sites using contracted service delivery have a high level of coordination with outside providers on compliance. Finally, provider services that are

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highly tailored to the work requirements of the human services program may result in less confusion for participants and human services staff. Alternatively, these services may not be individualized to best meet participants' needs and may not be the most effective in leading to self-sufficiency.

**Resource constraints.** The availability or lack of resources within human services programs and the larger community affect the need to partner with outside providers and the types of services offered. The decision to partner with outside providers may be largely driven by the availability of those providers and the extent to which provider services fit the needs of the human services program's participants. One major reason human services programs chose an in-house approach was the lack of availability of outside service providers in rural or under-resourced areas.

<sup>ii</sup>The study selected states from the pool of 17 states that operated mandatory SNAP E&T programs at the time of selection. They represent variations in dimensions of work requirement policies, such as minimum hours required per week, number of exemptions from work requirements, most severe sanction policies, and geographic variation, but they are not intended to be nationally representative.

<sup>iii</sup>In South Dakota, TANF program sites use different service delivery approaches, depending on the availability of outside service providers. The TANF program in urban areas uses a contracted approach, while the TANF program we visited in a rural area uses an in-house model, largely due to the lack of outside providers.

## ENDNOTES

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<sup>i</sup>Federal, regional, and local staff from the U.S. Department of Housing and Urban Development (HUD) indicated that HUD does not view the CSSR as a work requirement or a policy that promotes work. They were careful to say that, although the CSSR requires some type of employment or community service to enter or remain in public housing, it was not intended to be a work requirement and is not discussed as such within the agency. Despite this factor, the CSSR does fit the criteria for the study: it requires work or community service without which a resident could lose housing. Therefore, we included the CSSR in the policies we reviewed for this study.

## Acknowledgments

The authors wish to express their appreciation to those who contributed to this work, including the federal stakeholders and state and local administrators who took the time to share their perspectives with us. We also thank the Mathematica staff who helped collect the data for this analysis, Julie Hartnack and Andrew Gothro. Finally, we thank the Office of the Assistant Secretary for Planning and Evaluation at the U.S. Department of Health and Human Services for its support of the EMPOWERED project and we are especially grateful for the thoughtful guidance provided by Erica Meade, our Federal Project Officer.

This report was prepared under contract #HHSP2332015000351 / HHSP23337027T. The opinions and views expressed in this report are those of the authors. They do not necessarily reflect the views of the Department of Health and Human Services, the contractor or any other funding organization.

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