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# TANF 101

## *Block Grants*

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## Introduction

Nearly 25 years ago, the 1996 "welfare reform" law replaced Aid to Families with Dependent Children (AFDC) and related programs with the Temporary Assistance for Needy Families (TANF) block grant. AFDC was an uncapped federal matching program, under which states received more federal money when they spent more on cash assistance, and less when their caseloads declined. By contrast, under TANF, states are given a fixed block grant that they can spend on a wide variety of activities to further any of the four statutory purposes:

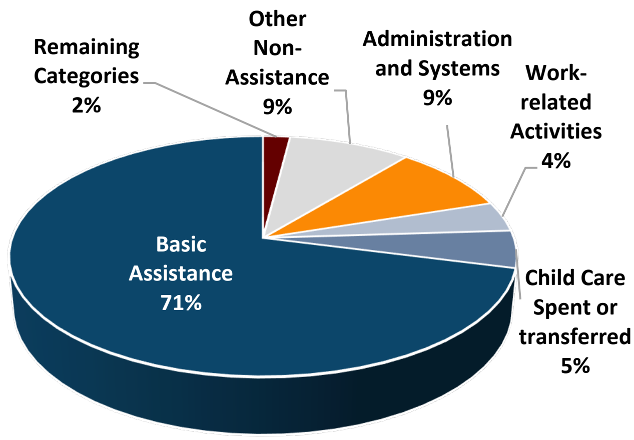
1) Provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives;
2) End the dependence of needy parents on government benefits by promoting job preparation, work, and marriage;
3) Prevent and reduce the incidence of out-of-wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies; and
4) Encourage the formation and maintenance of two-parent families.

Reducing poverty among children and families is not a listed purpose of the program—rather, the existing purposes aim to control behaviors.

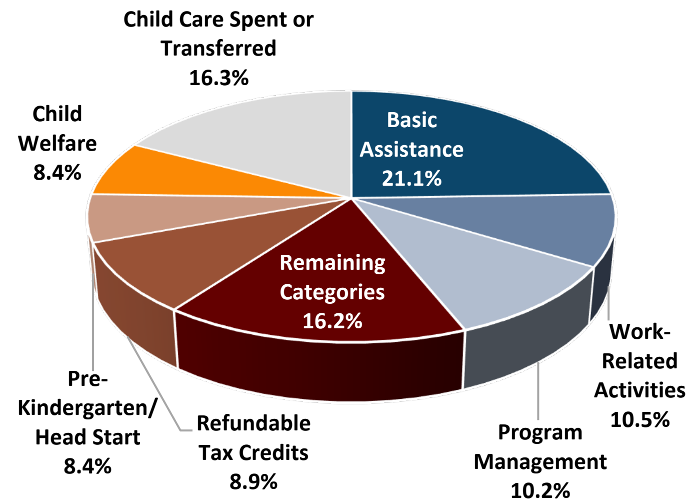
States can also use TANF funds for certain other activities, such as juvenile justice, that they supported under AFDC's Emergency Assistance pre-1996.

TANF also has a "maintenance of effort" (MOE) requirement under which states must continue to spend at least 75 percent of the amount that they did prior to welfare reform on programs serving needy families. The MOE requirement rises to 80 percent for states that fail another requirement called the work participation rate.[1] Neither the TANF block grant nor the MOE requirement are adjusted for inflation or population growth.

### *FY 1997 TANF MOE spending*




### *FY 2019 TANF MOE spending*




*Note: Refundable tax credits includes EITC and non-EITC spending; Child Welfare includes foster care spending from basic assistance, AUPL, and Non-AUPL. See text for explanation of AUPL.*

TANF and MOE spending is not limited to cash assistance. States may spend funds on a range of programs and services for needy families with children, regardless of whether the families are getting cash aid. States define what constitutes “needy,” and the income cut off for those programs is often much higher than the limit set for cash aid. When cash assistance caseloads fall—as they did dramatically during the late 1990s and more gradually since[2]—this makes it easier for states to use the funds for other TANF purposes. However, because the TANF block grant does not increase when assistance caseloads rise, states face difficult budget choices during times of increased economic hardship. With no new money, they must either cut other services funded with TANF or provide additional state funds.

The TANF Emergency Fund, created by the American Recovery and Reinvestment Act of 2009, was a temporary exception to that rule, providing an additional $5 billion over two years.[3] States were able to use these funds for cash assistance, short-term emergency benefits, and subsidized employment programs. The American Rescue Plan, enacted in March 2021, provided a $1 billion TANF Pandemic Emergency Assistance Fund for states to provide non-recurrent, short-term support to families during the COVID-19 pandemic.[4]

## TANF/MOE support a broad range of services for families with low incomes

States have used their flexibility under TANF to support a wide range of activities. In Fiscal Year (FY) 2019, the most recent year for which data are available, basic monthly cash assistance payments accounted for just 21.1 percent of combined TANF/MOE spending, down from 71 percent in FY 1997.[5] This primarily reflects the decline in TANF caseloads, which remain well under half their pre-welfare reform peak. TANF cash assistance has served fewer families with children living in poverty over time, in part due to policies like work requirements and time limits, that make the program harder to access.[6]

In 2019, states also reported spending 10.5 percent of their TANF/MOE funds on supporting parents in getting the skills they need for employment, finding and keeping jobs, or other work-related activities (although not all of these funds were used to serve families receiving assistance).

These national figures conceal a great deal of state-to-state variation in spending priorities. For example, spending on basic assistance ranged from less than 4 percent of total TANF/MOE spending in Indiana to over two-thirds in Kentucky.[7]

**The second largest use of TANF/MOE funds is to provide child care subsidies to families with low incomes**, including those receiving TANF, those who are transitioning from TANF, and those who have never received cash assistance or participated in the TANF program. Each state may transfer up to 30 percent of its TANF grant to the Child Care and Development Block Grant (CCDBG) or to a combination of CCDBG and the Social Services Block Grant (SSBG); states may also spend TANF and MOE funds directly on child care. In FY 2019, states spent or transferred a total of $5 billion in TANF and MOE funds on child care, accounting for 16.3 percent of all TANF/MOE spending.[8]

TANF funds represent a substantial portion of the national investment in child care. Total spending on child care—comprised of federal and state CCDBG funds and TANF and MOE direct spending—was $12.2 billion in FY 2018.[9]

However, as with cash assistance, there is a variation among states, with 21 states using less than 10 percent of TANF and MOE funds on child care and only 3 states using more than 40 percent.

In the past, states reported a significant share of TANF and MOE spending in non-descriptive categories including "other" and "authorized under prior law" (AUPL); these two categories accounted for 19.3 percent of TANF funds used in 2014. This made it difficult to understand how TANF funds were being used, or to compare across states. Starting in FY 2015, the Department of Health and Human Services (HHS) revised the reporting requirements to add new spending categories and to provide more detailed instructions on how to account for use of funds; states must also provide narrative descriptions of spending still reported as "other" or "AUPL."

The more detailed reporting for expenditures shows that states spent 8.4 percent of TANF and related funds on child welfare services in FY 2019. In a few states, child welfare accounted for very large shares of TANF spending: for example, Georgia and North Dakota spent 62.5 percent and 57.6 percent, respectively, of TANF and MOE funds on child welfare services. This figure does not include cash assistance spending on "child only" cases, which are often an alternative to foster care. (In 2019, more than half of TANF assistance cases were child-only cases without a parent present in the household.[10]) In some cases, child welfare agencies may be using TANF funds to provide families with case management, treatment and other services that support both family stability and economic security. However, in other cases, it appears that states are significantly supplanting state spending on core child welfare services, such as child protective services and foster care, with TANF funds.[11]

States also reported spending 8.4 percent of TANF/MOE on pre-kindergarten/Head Start programs.[12] According to long-standing ACF guidance, states may use TANF and MOE funds to support such programs as long as they are not generally available to all children throughout the state. HHS has encouraged states to use such funds to serve "at-risk" children from families with low incomes.[13] States ultimately get to decide the income eligibility for children in these programs. Again, this use of funds varied greatly by state; Arkansas and New Jersey spent roughly 38 percent and 41 percent, respectively, on pre-k and Head Start programs.

States are allowed to carry TANF funds over from year to year. At the end of FY 2019, states reported unobligated balances totalling about $4.5 billion. While some "rainy day" funds may be prudent, excessive carry over funds suggest that states could reasonably invest more in the immediate needs of families with low incomes in their state. Maine, Nebraska, Tennessee, and Wyoming each reported unobligated balances greater than their annual TANF block grant.[14] In 2020, some states, like Tennessee and Virginia, chose to invest their TANF carryover funds to provide emergency assistance to families with low incomes during the COVID-19 crisis.[15] Even with these investments, Tennessee still has a large amount of unspent TANF funds.

## State spending on social services has declined since 2002

During the early years of TANF, caseloads fell faster than anticipated. Therefore, all states spent less than they had budgeted and accumulated funds they were allowed to carry over from previous years. The TANF and MOE funds freed up by declining caseloads were often reinvested in a range of innovative programs designed to support working families paid low incomes, to address the root causes of poverty, and to promote two-generation benefits for parents and their children. These included refundable state Earned Income Tax Credits to make work pay; child care and transportation subsidies; home visiting programs for new parents; early education for young children; and programs to encourage teens to stay in school and avoid early childbearing.

As states realized the breadth of programs that could be supported by TANF/MOE funds, they rapidly drew down their carry-over funds. By 2001, states were spending more TANF funds each year than they received from the block grant.

However, as revenues declined during the 2001-2002 recession, **a number of states began to substitute TANF and MOE funds for state general revenues supporting social services for families with low incomes.** It appears that this shift continued through the 2000s, and accelerated during the Great Recession (2007-2009), which placed state budgets under severe pressure.

One complication making it difficult to monitor spending trends over time is that, starting in FY 2006, because of policy changes made by the Deficit Reduction Act of 2005, states had a strong incentive to report MOE spending *in excess* of the minimum required.[16] Many states made an effort to identify existing state spending on families with low incomes that was aimed at the purposes of TANF and thus could be claimed as MOE.

In addition, the availability of matching funds under the TANF Emergency Fund drew attention to a previously little-noticed provision allowing states to claim as MOE otherwise qualifying expenditures by third parties, such as businesses, foundations, nonprofits, and local governments, as long as the third party agrees.[17] For example, some states claim expenditures from private donations by nonprofit organizations on programs for youth in low-income communities as TANF MOE.

Many states used this provision during FYs 2009 and 2010 to qualify for funding from the TANF Emergency Fund. In a few states, third-party expenditures accounted for nearly half of spending reported as MOE.[18] While reported MOE spending increased by over $4 billion between FY 2005 and FY 2011, this almost certainly was partially driven by changes in data reporting, rather than true increases in the resources available to needy families. Many of these third-party activities were already taking place even when they were not claimed as MOE.[19]

Since the expiration of the Emergency Fund at the end of FY 2010, states have had weaker incentives to report additional spending. Reported MOE spending decreased by nearly $450 million between FY 2011 and FY 2013. It is unclear how to apportion this decline among 1) reporting changes; 2) the end of temporary programs supported under the Emergency Fund; and 3) decreased need due to improving economic conditions. Reported MOE spending has fluctuated around this level since then.

Researchers at the Rockefeller Institute of Government have attempted to monitor state spending on all social services, regardless of whether it was funded out of TANF or claimed toward the MOE requirement.[20] They found that, consistent with the declines in caseloads, spending on cash assistance has declined steadily since the creation of the TANF program. By contrast, spending on other non-medical social service programs—such as child care, child welfare, energy assistance, homeless shelters, and services for individuals with disabilities—increased significantly during the late 1990s but declined between 2002 and 2008.

During the Great Recession, increased demands for assistance and expanded federal support were counterbalanced by strained state budgets. At least 46 states responded to their budget deficits by imposing cuts in cash assistance and other social services.[21] Since the expanded federal assistance has come to an end, only some states have restored the cuts they made—and even those states have only partially done so. States will face similar, difficult budget constraints during the COVID-19 crisis. Unfortunately, cuts to cash assistance will remain a continuing threat in the years ahead, despite the increasing number of families who need such support.

## Block grant has not kept up with inflation and locks in low grants in Southern states

Under the 1996 law, the basic TANF block grant was fixed at $16.57 billion a year. This figure has not been increased to reflect inflation since lawmakers first created TANF. Thus, **the value of the block grant has been eroded by more than one-third.**

The TANF amount available for each state was set based on its spending under the AFDC program.[22] While states with lower median incomes received a higher federal match rate under AFDC, they also usually had much lower benefit levels. This meant that the value of the TANF block grant per child living in poverty also varied widely. Thus, in the first years of the block grant, Arkansas received less than $400 per year for each child in the state living in poverty, while Alaska received more than eight times as much.

There are also racial disparities in the level of each state's TANF benefits, and in how much states spend toward basic assistance. Black families are likelier to live in states that have the lowest benefits and that spend the least of their TANF dollars toward basic assistance.[23] This is the result of both current policy choices in the states and the structure of the block grant, which locks in the low benefit levels that Southern states had adopted under AFDC. Decisions by state lawmakers on TANF benefits and spending can stem from racist stereotypes about "welfare queens;" flawed ideas of who are "deserving" versus "undeserving" of financial support; and a desire to force people to accept jobs paying low wages.

Some in Congress realized the inequity in the block grant amounts at the time and, in the 1996 law, provided an additional allocation of funds—the TANF supplemental grants. These grants provided additional dollars to states that had either particularly low grants per person living in poverty or had high rates of population growth during the early 1990s. However, Congress allowed these grants to expire in FY 2011, resulting in a reduction of funding in these states.

Overall, the block grant has not been adjusted to reflect population growth or the rise of poverty. States that have experienced growth in the number of children living in poverty have seen their funding per child living in poverty decline substantially. Since 1997, states such as Alaska and Nevada have seen the number of children living in poverty climb as much as two-thirds; combined with inflation, this growth has cut the funds available per child living in poverty by more than 60 percent. Alaska's and Nevada's grants have fallen 67 percent and 61 percent, respectively, in purchasing power since 1997. (See Table 1.)

While Congress has provided some additional funding to states under the regular Contingency Fund, this funding is allotted to states in proportion to the basic block grant allocation and is limited to states that are able to increase their MOE above historical levels. Therefore, these additional funds have primarily gone to more affluent states that are able to spend more of their own funds.[24]

## Conclusion

The ambitious goals of the TANF program are not matched by proportionate resources, especially in states with high rates of poverty and low fiscal capacity.[25] The net result is a program under pressure, and cash assistance serving fewer children living in poverty. States have the flexibility to allocate the block grants among a range of programs and services, but flexibility is not a substitute for adequate funding.

**Table 1: Real and Nominal Analysis of Temporary Assistance for Needy Families (TANF) Block Grant Amounts**

| State | State Family Assistance Grant, Nominal Amount, 1997 (in millions) | State Family Assistance Grant, Real Amount, 2019 (in millions) | Number of Children Living in Poverty, 1997-1998 (in thousands) | Number of Children Living in Poverty, 2018-2019 (in thousands) | Real Grant Amount per Child Living in Poverty, 1997-1998 | Real Grant Amount per Child Living in Poverty, 2018-2019 | Percent Change in Grant per Child Living in Poverty |
|---|---|---|---|---|---|---|---|
| **Alabama** | $93.3 | $58.4 | 246 | 217 | $382.6 | $269.7 | -30% |
| **Alaska** | $63.6 | $27.9 | 21 | 27 | $3,119.7 | $1,032.3 | -67% |
| **Arizona** | $222.4 | $125.2 | 333 | 263 | $672.4 | $476.9 | -29% |
| **Arkansas** | $56.7 | $35.5 | 153 | 139 | $372.7 | $255.4 | -31% |
| **California** | $3,733.8 | $2,283.6 | 2,185 | 1,298 | $1,696.1 | $1,759.3 | 4% |
| **Colorado** | $136.1 | $85.1 | 114 | 145 | $1,198.3 | $587.1 | -51% |
| **Connecticut** | $266.8 | $166.9 | 90 | 87 | $2,958.1 | $1,929.9 | -35% |
| **Delaware** | $32.3 | $20.2 | 33 | 19 | $971.1 | $1,092.2 | 12% |
| **District of Columbia** | $92.6 | $57.9 | 45 | 24 | $2,065.1 | $2,465.9 | 19% |
| **Florida** | $562.3 | $351.9 | 646 | 687 | $875.6 | $512.6 | -41% |
| **Georgia** | $330.7 | $207.0 | 497 | 463 | $669.9 | $447.0 | -33% |
| **Hawaii** | $98.9 | $61.9 | 53 | 35 | $1,869.4 | $1,793.8 | -4% |
| **Idaho** | $31.9 | $19.0 | 76 | 48 | $422.6 | $396.4 | -6% |
| **Illinois** | $585.1 | $366.1 | 492 | 373 | $1,181.3 | $982.8 | -17% |
| **Indiana** | $206.8 | $129.4 | 160 | 224 | $1,282.6 | $579.0 | -55% |
| **Iowa** | $131.5 | $82.0 | 93 | 92 | $1,410.9 | $890.9 | -37% |
| **Kansas** | $101.9 | $63.6 | 79 | 83 | $1,288.3 | $771.3 | -40% |
| **Kentucky** | $181.3 | $113.4 | 198 | 178 | $908.6 | $639.1 | -30% |
| **Louisiana** | $164 | $102.6 | 291 | 300 | $567.1 | $342.0 | -40% |
| **Maine** | $78.1 | $48.9 | 38 | 36 | $2,067 | $1,357.8 | -34% |
| **Maryland** | $229.1 | $143.4 | 122 | 135 | $1,863.5 | $1,065.8 | -43% |
| **Massachusetts** | $459.4 | $287.4 | 231 | 135 | $1,973.4 | $2,129.2 | 8% |
| **Michigan** | $775.4 | $485.2 | 397 | 288 | $1,938.1 | $1,684.6 | -13% |
| **Minnesota** | $268 | $163.1 | 211 | 112 | $1,263.4 | $1,462.9 | 16% |
| **Mississippi** | $86.8 | $54.3 | 163 | 185 | $534.7 | $294.3 | -45% |
| **Missouri** | $217.1 | $135.8 | 229 | 203 | $942.7 | $669.0 | -29% |
| **Montana** | $45.5 | $23.8 | 51 | 27 | $906.1 | $881.0 | -3% |
| **Nebraska** | $58 | $35.6 | 68 | 75 | $852.9 | $477.2 | -44% |
| **Nevada** | $44 | $27.5 | 73 | 115 | $608.2 | $238.9 | -61% |
| **New Hampshire** | $38.5 | $24.1 | 43 | 14 | $888.7 | $1,721.7 | 94% |
| **New Jersey** | $404 | $252.8 | 256 | 162 | $1,569.2 | $1,565.4 | 0% |
| **New Mexico** | $126.1 | $69.0 | 158 | 106 | $802 | $654.1 | -18% |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **New York** | $2,442.9 | $1,528.6 | 1,134 | 629 | $2,138.7 | $2,432.1 | 14% |
| **North Carolina** | $302.2 | $188.6 | 330 | 418 | $923.2 | $451.2 | -51% |
| **North Dakota** | $26.4 | $16.5 | 34 | 18 | $770.5 | $943.9 | 23% |
| **Ohio** | $728 | $455.5 | 467 | 452 | $1,548.6 | $1,007.8 | -35% |
| **Oklahoma** | $148 | $90.9 | 156 | 133 | $944.5 | $686.0 | -27% |
| **Oregon** | $167.9 | $104.2 | 154 | 92 | $1,085.5 | $1,139.2 | 5% |
| **Pennsylvania** | $719.5 | $450.2 | 491 | 378 | $1,454.1 | $1,192.6 | -18% |
| **Rhode Island** | $95 | $59.5 | 43 | 24 | $2,218.4 | $2,477.4 | 12% |
| **South Carolina** | $100 | $62.6 | 185 | 201 | $536.3 | $311.2 | -42% |
| **South Dakota** | $21.9 | $13.3 | 26 | 33 | $852.1 | $409.7 | -52% |
| **Tennessee** | $191.5 | $119.8 | 269 | 269 | $717.3 | $445.5 | -38% |
| **Texas** | $486.3 | $304.3 | 1,264 | 1,199 | $386.8 | $253.9 | -34% |
| **Utah** | $76.8 | $47.3 | 84 | 73 | $919.8 | $648.1 | -30% |
| **Vermont** | $47.4 | $29.6 | 17 | 15 | $2,765.5 | $2,043.4 | -26% |
| **Virginia** | $158.3 | $99.0 | 215 | 211 | $730.6 | $469.4 | -36% |
| **Washington** | $404.3 | $238.0 | 189 | 173 | $2,122.8 | $1,375.6 | -35% |
| **West Virginia** | $110.2 | $68.9 | 82 | 73 | $1,341.6 | $944.4 | -30% |
| **Wisconsin** | $318.2 | $196.4 | 146 | 138 | $2,170.1 | $1,423.2 | -34% |
| **Wyoming** | $21.8 | $11.6 | 19 | 15 | $1,138.1 | $797.9 | -30% |
| **United States** | $16,488.7 | $10,194.6 | 13,134 | 10,828 | $1,248.8 | $941.5 | -25% |

***Source:*** *Office of Family Assistance, TANF Financial Data for years 1997 through 2019; Current Population Survey March Supplement, "Related Children Under Age 18" for years 1997-2019. Although the American Community Survey is generally preferable to the CPS for state-level analysis, it is not available for the 1996 time period. Therefore, we have chosen to average 2 years of CPS data for states.*

**Note:** Real amounts of the TANF block grant are a summation of the State Family Assistance Grant and Supplemental Grants awarded to states, adjusted to 1997 dollars using the CPI. (*E.2.: Expenditures using State Family Assistance Grant (SFAG) Funds, FY 2019*, Office of Family Assistance, August 2019, **https://www.acf.hhs.gov/sites/default/files/ofa/tanf_financial_data_fy_2019_91020.pdf**). This amount is divided by the number of children in poverty in each state to derive the real grant awarded per child living in poverty in each state.

# Endnotes

[1] For more detail on the TANF work participation rate, see Elizabeth Lower-Basch and Ashley Burnside, *TANF 101: Work Participation Rate*, Center for Law and Social Policy, February 2021, **https://www.clasp.org/publications/report/brief/tanf-101-work-participation-rate**.
[2] For more detail on the changes in the cash assistance program, see Elizabeth Lower-Basch, *TANF 101: Cash Assistance*, Center for Law and Social Policy, April 2019, **https://www.clasp.org/publications/report/brief/tanf-101-cash-assistance**.
[3] Elizabeth Lower-Basch and Elizabeth Kenefick, *TANF Emergency Fund*, Center for Law and Social Policy, October 2010, **https://www.clasp.org/sites/default/files/public/resources-and-publications/publication-1/TANF-ECF-Use-Sept-30.pdf**.
[4] Office of Family Assistance, "Pandemic Emergency Assistance Fund," March 25, 2021, **https://www.acf.hhs.gov/ofa/data/pandemic-emergency-assistance-fund**.
[5] *TANF Financial Data - FY 2019*, Office of Family Assistance, October 2020, **https://www.acf.hhs.gov/ofa/resource/tanf-financial-data-fy-2019**.
[6] Laura Meyer and Ife Floyd, *Cash Assistance Should Reach Millions More Families to Lessen Hardship*, Center on Budget and Policy Priorities, updated November 30, 2020, **https://www.cbpp.org/research/family-income-support/cash-assistance-should-reach-millions-more-families**.
[7] *TANF and MOE Spending and Transfers by Activity, FY 2019* (State Pie Charts), Office of Family Assistance, October 2020, **https://www.acf.hhs.gov/ofa/data/tanf-and-moe-spending-and-transfers-activity-fy-2019-contains-national-state-pie-charts**.
[8] U.S. Department of Health and Human Services, *TANF and MOE Spending and Transfers by Activity, FY 2019*, **https://www.acf.hhs.gov/ofa/resource/tanf-and-moe-spending-and-transfers-by-activity-fy-2019-contains-national-state-pie-charts**.
[9] CLASP calculation of FY 2018 total combined spending on child care assistance—comprised of CCDBG and TANF-related funds. (Note that a portion of state TANF MOE spent on child care may also be counted as MOE under CCDBG.)
[10] *Table 3. TANF Families by Number of Adult Recipients: FY 2019,* Office of Family Assistance, November 2020, **https://www.acf.hhs.gov/ofa/resource/characteristics-and-financial-circumstances-of-tanf-recipients-fiscal-year-2019**.
[11] Michelle K. Derr, Tara Anderson, LaDonna Pavetti, et al., *Understanding Two Categories of TANF Spending: "Other" and "Authorized Under Prior Law"*, Mathematica Policy Research, September 2009, **https://www.mathematica.org/our-publications-and-findings/publications/understanding-two-categories-of-tanf-spending-other-and-authorized-under-prior-law**.
[12] *TANF and MOE Spending and Transfers by Activity, FY 2019* (National Pie Chart), Office of Family Assistance, October 2020, **https://www.acf.hhs.gov/ofa/data/tanf-and-moe-spending-and-transfers-activity-fy-2019-contains-national-state-pie-charts**.
[13] U.S. Department of Health and Human Services, "TANF-ACF-PI-2005-01 (Funding Childhood Education, School Readiness, Kindergarten and Other Public Education Programs," *Office of the Administration for Children and Families*, April 2005, **https://www.acf.hhs.gov/ofa/policy-guidance/tanf-acf-pi-2005-01-funding-childhood-education-school-readiness-kindergarten#:~:text=If%2C%20under%20State%20law%2C%20the,other%20educational%20costs%20under%20purpose**.
[14] *Table A.6. Summary of Federal TANF Funds, FY 2019*, Office of Family Assistance, October 2020, **https://www.acf.hhs.gov/ofa/data/tanf-financial-data-fy-2019**.
[15] Ashley Burnside, "The Rainy Day is Here: During COVID-19, States Should Increase Emergency Assistance," CLASP, May 8, 2020, **https://www.clasp.org/blog/rainy-day-here-during-covid-19-states-should-increase-emergency-assistance**.
[16] The DRA changes had the effect of making it much more difficult for states to meet the work participation rate requirement. Under the "Excess MOE" provision, states that claimed more MOE than the minimum required could adjust their caseload levels and claim additional caseload reduction credit. In addition, states with high levels of MOE could draw down additional funding from the TANF Contingency Fund. For more details, see Kay E. Brown, *Temporary Assistance for Needy Families: State Maintenance of Effort Requirements and Trends: Testimony before the Subcommittee on Human Resources, Committee on Ways and Means, U.S. House of Representatives,* U.S. Government Accountability Office, May 17, 2012, **http://www.gao.gov/assets/600/590958.pdf**.
[17] Third party expenditures may be claimed as MOE under 45 CFR § 263.2(e).
[18] U.S. Government Accountability Office, "Temporary Assistance for Needy Families: Update on States Counting Third-Party Expenditures toward Maintenance of Effort Requirements," February 2016, **http://www.gao.gov/assets/600/592861.pdf**.
[19] States claiming third party expenditures as MOE that were not claimed as MOE during the base years of FYs 2007 or 2008 were required to provide HHS with information to document that they represented true increases in spending over the base year but were not required to make retroactive changes to their MOE reports for the base years.
[20] Tom Gais and Lucy Dadayan, "The New Retrenchment: Social Welfare Spending," 1977-2006. Rockefeller Institute, September 2008,

**http://www.rockinst.org/pdf/workforce_welfare_and_social_services/2008-09-15-the_new_retrenchment_social_welfare_spending_1977-2006.pdf**; Thomas Gais, Donald Boyd, and Lucy Dadayan, "The Social Safety Net, Health Care, and the Great Recession;" Robert Ebel and John Peterson, The Oxford Handbook of State and Local Government Finance, Oxford Press, 2012.

[21] Nicholas Johnson, Phil Oliff, and Erica Williams, *An Update on State Budget Cuts*, Center on Budget and Policy Priorities, updated February 2011, **http://www.cbpp.org/cms/index.cfm?fa=view&id=1214**.

[22] The amount for TANF was equal to the maximum amount that the state received under AFDC and related to job training and emergency assistance programs during the 1992-1995 period, when caseloads were at their highest.

[23] Ashley Burnside and Liz Schott, *States Should Invest More of Their TANF Dollars in Basic Assistance for Families*, Center on Budget and Policy Priorities, February 25, 2020, **https://www.cbpp.org/research/family-income-support/how-states-use-funds-under-the-tanf-block-grant**.

[24] Office of Family Assistance, "TANF Contingency Fund Awards, 2006-2013," Administration for Children & Families, U.S. Department of Health & Human Services, January 30, 2014, **http://www.acf.hhs.gov/programs/ofa/resource/tanf-contingency-awards**.

[25] Tom Gais and Lucy Dadayan, *The New Retrenchment: Social Welfare Spending*.