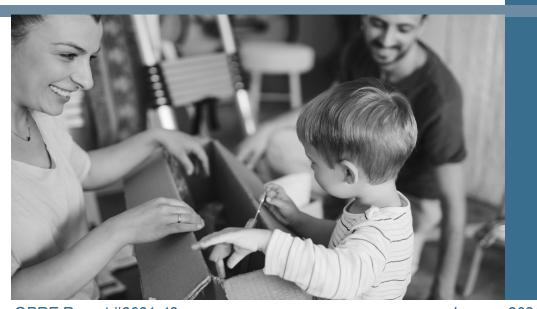


ASSISTING FAMILIES EXPERIENCING HOMELESSNESS WITH TANF FUNDING:

Findings from a Survey of TANF Administrators

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Highlights

- TANF agencies have a variety of approaches to supporting families experiencing homelessness and
 providing services exclusively to families experiencing or at-risk of experiencing homelessness.
- States do not have a uniform definition of homelessness, though the majority include components from the U.S.
 Department of Housing and Urban Development (HUD) definition of "literally homeless." Almost all TANF
 programs ask and collect information about housing status via an application for TANF assistance, though the
 steps after determining housing status vary.
- Less than a third of TANF programs designate certain benefits or services as only for families experiencing
 homelessness. Less than half of state administrators designate TANF funding to provide housing services
 generally. Instead, states report their role as providing technical assistance and coordinating different
 organizations' responses.
- States report partnering with state-level housing departments, direct providers of homelessness services, local public housing agencies, and Continuums of Care (specifically Emergency Solutions Grants (ESG) programs). Many TANF agencies partner by providing funding, but for most states this coordination does not extend to data sharing.

About How TANF Agencies Support Families Experiencing Homelessness Study

The U.S. Department of Health and Human Services, Administration for Children and Families (ACF), Office of Planning, Research, and Evaluation contracted Abt Associates and its partner MEF Associates to conduct the study *How TANF Agencies Support Families Experiencing Homelessness*. The study considers the extent to which TANF agencies across the country are using TANF funds to serve and support families experiencing or at-risk of homelessness. To better understand state TANF agencies' overall philosophies and policies toward addressing family homelessness and the extent to which local TANF programs are implementing these policies, the Abt team conducted a scan of TANF agency practices in 2018 and 2019.

Study Background: In 2013, the Administration for Children and Families' Office of Family Assistance issued an Information Memorandum (TANF-ACF-IM-2013-01) highlighting how TANF funds can be used to assist families experiencing or at-risk of experiencing homelessness. The memorandum outlines allowable uses for TANF funds, details how TANF and maintenance of effort (MOE) funds can be used to address housing needs and provide other supportive services, and provides examples of how state agencies used TANF to serve families experiencing homelessness.

Study Methodology: The scan of TANF agency practices consisted of two activities:

- (1) a systematic document review of 25 state TANF plans in 2018b; and
- (2) a 2019 online survey of all state TANF administrators and a sample of three local TANF administrators in each state. $^{\circ}$

For the document review, the research team coded and analyzed 25 state TANF plans and associated policy documents. For the online survey, the research team targeted both states and counties to better understand the ways that states may be responding to the needs of families experiencing homelessness through their TANF program policies and how those policies are implemented at the county or local level. In summer 2019, the study team administered an online survey to all 54 state and territory TANF administrators and a sample of three county TANF administrators per state. The study team selected the three counties from each state to provide a range of urbanicities, size of population experiencing homelessness, and geographic location within the state. The study achieved an 83 percent response rate for the survey of state administrators and a 51 percent response rate for the survey of county administrators.

¹ Literally homeless is a term used to reference Category 1 of HUD's four categories of homelessness. HUD defines Category 1 as "individuals or families who lack a fixed, regular, and adequate nighttime residence."

^a As a condition of the TANF block grant, states are required to spend a certain amount of their own funds on TANF-allowable categories. These funds are called maintenance of effort (MOE) funds.

b Each state is required to submit a written document to ACF outlining how it plans to administer its TANF program, including establishing eligibility standards and criteria for delivering benefits. We reviewed 2018 state TANF plans from California, Colorado, Delaware, Florida, Hawaii, Illinois, Iowa, Louisiana, Massachusetts, Minnesota, Mississippi, New Mexico, New York, North Dakota, Ohio, Oregon, Pennsylvania, South Carolina, Texas, Utah, Vermont, Washington, the District of Columbia, West Virginia, and Wyoming.

^C In some states, state staff responded on behalf of their local TANF offices.

Introduction

Because Temporary Assistance for Needy Families (TANF) is a federal block grant program, states have considerable discretion and flexibility in determining their policies, financing, and implementation approach. TANF is a tool that states can leverage in connecting families experiencing homelessness to the services they need, including TANF-funded services such as cash assistance and childcare support, and housing supports such as rapid re-housing programs and subsidized housing.

This brief presents how TANF agencies identify families experiencing homelessness, the extent to which agencies use TANF funds to provide housing services to families experiencing or at-risk of experiencing homelessness, and what organizations TANF agencies partner with or fund to provide housing assistance. This brief is based primarily on findings from a survey of state TANF administrators conducted in 2019. The survey findings are supplemented with findings from a review of state TANF plans and from a county TANF administrator survey highlighting examples of differences between state and county approaches to assisting families experiencing homelessness. (All references to TANF administrators, TANF agencies, or survey respondents refer to the state level unless otherwise noted.)

The table below defines key terms, which will be used throughout the brief related to housing service providers for families experiencing or at-risk of experiencing homelessness.

Key Term	Definition
Continuums of Care (CoCs)	A CoC is a regional/state/local community planning body that coordinates housing and services funding for families and individuals experiencing homelessness. The CoC program is designed to assist by providing the housing and/or services needed to help individuals or families move into transitional and permanent housing, with the goal of long-term stability.
Emergency Solutions Grants (ESG) program	The ESG program provides grants to states, counties, cities, and U.S. territories to support homelessness prevention, emergency shelter and related services. The program is designed to help people quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.
Information Systems	An HMIS is a local information technology system implemented by the local CoC to collect client-level data on the provision of housing and services to people currently experiencing and at-risk of experiencing homelessness.
	PHAs are state or local agencies that manage rental housing and housing subsidies for eligible low-income families, the elderly, and persons with disabilities. PHA housing comes in all sizes and types, from scattered single-family houses to high rise apartments for elderly families.
Rapid re-housing (RRH) programs	RRH programs provide short-term rental assistance and case management to individuals and families experiencing homelessness so they can quickly move to permanent housing. The core elements of RRH are housing identification, rental and move-in assistance, and case management.

Reflecting the flexible structure of TANF, states have a variety of methods to identify families experiencing or at-risk of homelessness

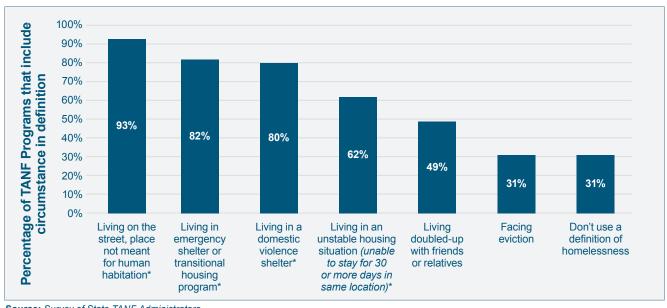
The online survey of TANF administrators reveals that while nearly all TANF agencies use their application process to collect information about a household's housing status, at this time, agencies do not share a common definition of homelessness. After collecting information on housing status, TANF agencies use varying approaches to connect families experiencing or at-risk of experiencing homelessness to support services.

TANF agencies do not have a uniform definition for homelessness

The online survey asked TANF administrators about the different living circumstances included in their definition of homelessness (see Exhibit 1). A majority of administrators report they use one of the two key circumstances included in HUD's definition of literal homelessness1: "living on the street or in a place not meant for human habitation" (93 percent) and "living in an emergency shelter or transitional housing" (82 percent) (see starred columns in Exhibit 1). Almost two-thirds of administrators (62 percent) also report including "people living in an unstable housing situation" in their definitions of homelessness, and almost half of administrators (49 percent) report including "people living doubled-up with friends and relatives."

Almost a third of administrators (31 percent) report their state does not have a set definition of homelessness, either letting local TANF agencies define homelessness or not using a standard definition. Administrators could select multiple survey responses for the different components that comprise their definition, and some administrators selected seemingly incompatible options. For example, 18 percent of administrators report that they do not have a definition of homelessness, but also identify at least one circumstance as included in their definition. One possible explanation is that even though the agency does not have an official definition, there are circumstances used to determine a family's housing status. As one administrator offers, "while housing situation may be determined and include one or more of the conditions listed here, the state doesn't use an official definition of homeless with respect to TANF cash assistance."

Exhibit 1: A majority of states include circumstances that comprise HUD's definition of homelessness



Source: Survey of State TANF Administrators

Notes: * indicates alignment with being literally homeless per Category 1 of HUD's definition of homelessness.

N=45 states, missing responses for each survey item range from 3-29.

Responses may not sum to 100% because the question allowed multiple responses.

¹ U.S. Department of Housing and Urban Development. HEARTH Homeless Definition Final Rule: https://www.govinfo.gov/content/pkg/FR-2011-12-05/pdf/2011-

Nearly all TANF agencies rely on the TANF application process to collect information about a family's housing status

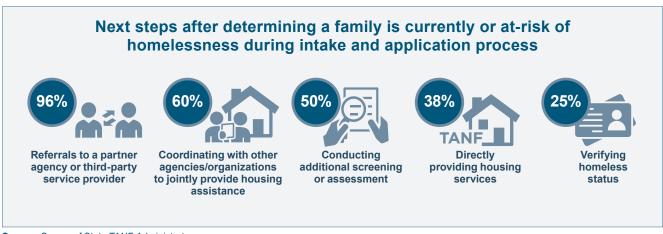
Most TANF agencies collect information about a family's housing status at some point during their application process. Of the 45 administrators (96 percent of respondents) who say their states ask TANF applicants about their housing status, all indicate staff collect at least some of this information via self-report. Additionally, about one quarter (24 percent) of administrators say TANF staff rely on documentation from a partner agency to learn about applicants' current housing situation. Only a very small number of administrators (2 percent) report that TANF programs use Homeless Management Information Systems (HMIS).

In the survey, administrators describe two methods by which their agencies identify families experiencing homelessness: via the TANF application process or by relying on an outside source to collect and verify this information.

- Application process: The timing and intensity of these efforts vary, ranging from directly asking
 about homelessness status (for example, providing a checkbox to indicate homelessness or asking
 about applicants' living situations during an intake assessment) to expecting applicants to self-report
 homelessness at some point during the application process.
- Outside collection and verification: A small number of TANF administrators report requiring verification from applicants' housing providers as their method of identifying homelessness.

TANF agencies have a variety of approaches to supporting families experiencing or at-risk of homelessness

Administrators report their programs taking one or more actions after determining whether families are currently or at-risk of experiencing homelessness during the intake and application process (see further discussion below).



Source: Survey of State TANF Administrators

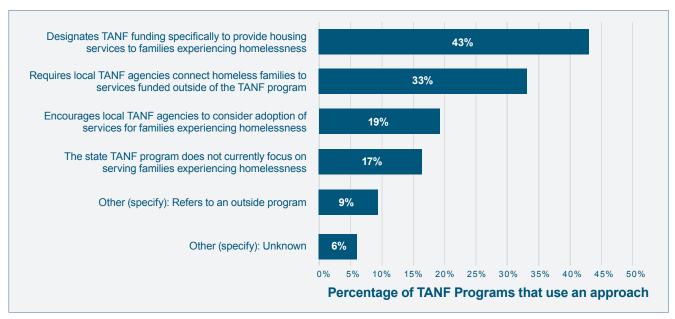
Notes: N=47 states

The majority of TANF programs do not use their funds to specifically or exclusively provide housing services to families experiencing homelessness

States have a spectrum of approaches and services to assist families experiencing homelessness

Fewer than half of administrators say they designate TANF funding to provide housing services (43 percent) or require that local TANF agencies connect families experiencing homelessness to other outside services (33 percent).

Exhibit 2: States employ multiple approaches to support families experiencing homelessness

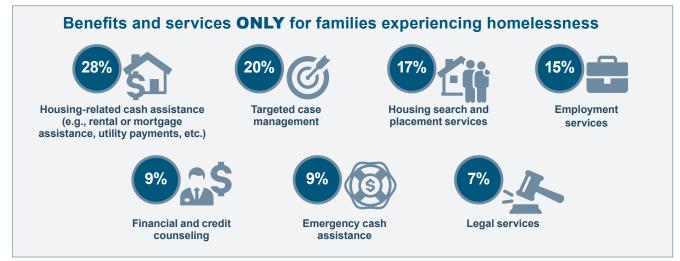


Source: Survey of State TANF Administrators

Notes: N=47 states.

Responses may not sum to 100% because the question allowed multiple responses.

Generally, few benefits and services are designated *only* for families experiencing homelessness. Less than a third of respondents report offering targeted case management, housing search and placement services, or employment services *only* to families experiencing homelessness. For those states targeting assistance specifically for families experiencing homelessness, the most common reason cited is to help these families secure permanent housing.



Source: Survey of State TANF Administrators

Notes: N=46 states.

Responses may not sum to 100% because the question allowed multiple responses.

Some states exempt families experiencing homelessness from TANF eligibility requirements

TANF's block grant structure allows states broad discretion in deciding which types of assistance to provide and in setting eligibility requirements beyond the federal standards for that assistance. Almost half of TANF administrators that responded to the survey (45 percent) report that an individual receiving TANF and exempt from federal work requirements must also meet other state-level requirements to remain eligible for assistance. Some states choose to alter their TANF program requirements for families experiencing homelessness; one-fifth (20 percent) of responding states exempt families experiencing homelessness from mandated work participation requirements. Just four percent of responding administrators report exempting families experiencing homelessness from TANF time limits.

TANF agencies have programs to preemptively assist families who are at-risk of experiencing homelessness

Among states that use TANF assistance to specifically identify families experiencing homelessness, there is a more uniform definition of what circumstances make a family at-risk of experiencing homelessness.

- Almost half of administrators report that their policies seek to identify families who may be at-risk of
 experiencing homelessness. In these 25 states, almost all administrators (92 percent) cite living in
 an unstable housing situation and having an eviction notice as circumstances when a person would
 be at-risk of experiencing homelessness.
- Approximately half of administrators report offering benefits and services only available to families at-risk of experiencing homelessness.
 - ▶ Over half of administrators report providing housing-related cash assistance *only* to families at-risk of experiencing homelessness.
 - ▶ Between one-third and one-half of administrators say their state offers employment services, emergency cash assistance, and housing search and placement services *only* to families receiving TANF who are at-risk of homelessness.
 - ▶ Between one-quarter and one-third of administrators report the availability of targeted case management and legal services *only* for these vulnerable families.

TANF agencies provide technical guidance, coordinate policies and service delivery, and offer funding to other organizations assisting families experiencing homelessness

Through the online survey, TANF administrators responded that their states target their assistance to families currently experiencing or at-risk of homelessness through: (1) technical guidance; (2) coordinating policies and service delivery; and (3) allowing county or local TANF offices to develop their own spending priorities.



of state TANF administrators
PROVIDE TECHNICAL
GUIDANCE to local TANF case
managers and other
local office staff on how to
assist families experiencing
homelessness



of state TANF administrators
COORDINATE POLICIES
AND SERVICE DELIVERY
WITH OTHER STATELEVEL DEPARTMENTS
that assist families experiencing

homelessness



of state TANF administrators indicate that county administrators and TANF offices CAN DEVELOP THEIR OWN SPENDING PRIORITIES

Source: Survey of State TANF Administrators **Notes**: N=46 states

In addition to the above strategies, one agency places its staff at a local non-profit social service and homeless shelter provider that assists families in locating and maintaining employment. This co-location allows for further coordination of TANF and other services for families experiencing homelessness.

TANF agencies coordinate with other state departments and local organizations to provide housing services

Over half (54 percent) of responding administrators report that they coordinate policies and service delivery between their TANF program and other departments and organizations that assist families experiencing homelessness. This includes coordination with: direct providers of homelessness services; the state department of housing development or the state housing finance agency; local public housing agencies (PHAs); regional, statewide, or interstate homelessness initiatives such as statewide interagency councils on homelessness or interagency task forces created by governors; Continuums of Care (CoCs); and Emergency Solutions Grants (ESG) programs (see key terms box above for additional information about PHAs, CoCs and ESGs). Coordination for most TANF agencies does not extend to data sharing with homeless service organizations. Only 25 percent of responding administrators report that their agency exchanges data with local homeless providers, 11 percent with their local CoC, and 2 percent with local PHAs.



of responding state TANF administrators report that they coordinate policies and service delivery between their TANF program and other state-level departments that assist families experiencing homelessness.



- 53%
- report coordination between TANF and direct providers of homelessness services
- report coordination with local public housing agencies

- 47%
- report significant or moderate interactions with their state department of housing development or state housing finance agency
- report coordination with Continuums of Care (CoCs)

- 40%
- report their agency is involved in regional, statewide, or interstate homelessness initiatives such as statewide interagency councils on homelessness or interagency task forces created by governors
- report coordination with Emergency Solutions Grants (ESG) programs

Source: Survey of State TANF Administrators Notes: N=45 states

State agencies also fund other organizations that provide housing services

A small number of TANF agencies indicate that they also serve families experiencing or at-risk of homelessness by directly funding other organizations that assist this population. About one-third (32 percent) of responding TANF agencies fund direct providers of homelessness services. Only about one in ten TANF agencies reports funding CoCs (11 percent), ESG programs (9 percent), or the state department of housing or state housing finance agency (9 percent). Two percent of administrators report providing funding to local PHAs.

State TANF plans describe approaches used to support families experiencing homelessness

State TANF agencies provide a variety of housing services to families currently experiencing or at-risk of experiencing homelessness. Generally, the 25 reviewed state TANF plans designate very few benefits and services *only* for families experiencing or at-risk of experiencing homelessness.

- Twelve states provide a variety of housing stability services, including utility assistance, landlord
 engagement services, case management, housing search assistance, rental arrears, credit repair, and
 eviction prevention services.
- Twelve states offer a wide range of *housing subsidies*, which can be used for mortgage payments, security deposits, rental vouchers, or to pay for a hotel or motel stay.
- Eleven state plans outline an emergency assistance program. These programs typically require an
 immediate threat of homelessness, like an eviction or foreclosure notice, or threat of domestic violence.
 Emergency assistance program funding can be used for a variety of housing-related assistance, including
 rental or mortgage payments, utility bills, security deposits, or temporary housing in a hotel or shelter.

- Three states use TANF funds to provide job preparation/employment services for those experiencing
 or at-risk of homelessness, including financial literacy, budgeting and life skills training, job and job search
 training, and short-term and long-term goal-setting specifically for families experiencing homelessness.
- While not specific to families experiencing homelessness, some TANF agencies offer other assistance
 programs that can provide housing support. In their state plans, 19 of the 25 states designate TANF funds
 to provide rental or emergency fund assistance to provide "immediate relief to those who are not able
 to access basic human necessities." Eight states specifically include shelter among their criteria for basic
 necessities.
- Sixteen states assist families with the goal of ending their episode of homelessness or alleviating their
 housing instability through *formal diversion programs* designed to support families during a temporary
 crisis and resolve their issue without applying for TANF benefits. Through these programs, states offer onetime or short-term payments, which families can use to pay rental arrears, utilities, or other housing costs.
- Six states had intensive case management services for families currently experiencing housing instability
 and thus at-risk of homelessness. Case management activities included: housing counseling or placement,
 housing search assistance, drafting a housing stabilization plan, and financial literacy training.

County TANF Administrators Report Close Relationships with Local Homeless Assistance Programs

In the survey of TANF administrators, county administrators reported having a better understanding of local verification practices implemented by TANF caseworkers than state administrators. County administrators also report developing closer relationships with local homeless service provider partners than state administrators.

Responding county TANF administrators are more likely than state administrators to report:

- Their staff verify housing status via documentation from partner agencies (52 percent of county administrators; 24 percent of state administrators) and HMIS records (14 percent of county administrators; 2 percent of state administrators).
- Data sharing at higher rates than their state counterparts. The most common data exchange
 partners reported for county administrators are direct homeless service providers (39 percent of
 county administrators; 25 percent of state administrators) followed closely by local PHAs (37 percent
 of county administrators; 2 percent of state administrators). One-quarter (25 percent) of county
 TANF administrators report they exchange data with their local CoC, compared to 11 percent of
 state administrators.

Despite higher rates of data sharing and documentation, *fewer surveyed county administrators coordinate with another agency to offer families experiencing homelessness housing assistance* (60 percent of state administrators; 50 percent of county administrators). This may reflect that double the number of county administrators report that their county TANF program does not currently focus on serving families experiencing homelessness (34 percent of county administrators; 17 percent of state administrators).

Source: Survey of state and county TANF administrators.

Notes: Housing status verification: N=45 states, N=84 counties;

Data sharing: N=44 states, N=67 counties; Coordination: N=44 states, N=67 counties;

Focus on serving families experiencing homelessness: N=47 states, N=79 counties.

State TANF plans detail coordination between organizations

State TANF agencies sometimes rely on partnerships with local organizations to assist families experiencing homelessness. These relationships may support program implementation, service delivery, the provision of technical assistance, and data sharing. Four states formally contract with local non-profits to pursue TANF program goals (e.g., employment support for families experiencing homelessness, rapid re-housing services) as outlined in their TANF plan; four states partner with non-governmental organizations to provide emergency housing assistance; two states collaborate directly with the local CoC to implement TANF-funded programs for families experiencing homelessness; and two states contract with Community Action Agencies to assist families experiencing homelessness. Nine TANF agencies either designate funding for or partner with non-governmental homelessness service providers, such as local emergency shelters or rapid re-housing or permanent supportive housing programs to assist families experiencing homelessness.

States did not make many changes due to the 2013 ACF information memorandum

Only a small percentage of administrators (7 percent) report that ACF's Office of Family Assistance 2013 Information Memorandum (TANF-ACF-IM-2013-01), which highlights how TANF funds can be used to assist families experiencing or at-risk of experiencing homelessness, led to changes in their approaches to providing assistance. Of those administrators who report other motivating factors, 58 percent say the process improvements were due to a state policy change. When asked how long specific benefits and services have been available to families experiencing homelessness, the majority of administrators say that the benefits and services have been available for five or more years, and thus likely in many cases implemented prior to the release of the 2013 memorandum.

Conclusion

At this time, many states do not specifically target their TANF funds to assist families experiencing or at-risk of homelessness. Reflecting the broad discretion that states have to determine the assistance they provide through TANF, there is not currently a uniform process by which states identify families experiencing or at-risk of homelessness, nor is there a standard set of available services or benefits. However, there are some TANF-funded housing programs available exclusively for families experiencing or at-risk of experiencing homelessness that will be highlighted in this study's final report. Over half of TANF agencies report coordinating most frequently with other state departments and direct service organizations and less so with CoCs or ESG programs to provide support for families experiencing homelessness.

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