



Office of the Inspector General
Commonwealth of Massachusetts

Glenn A. Cunha
Inspector General

**The Bureau of Program Integrity's
Update on the Work Program
Requirement for Transitional Aid
to Families with Dependent
Children**

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One Ashburton Place, Room 1311 | Boston, MA 02108 | (617) 727-9140 | www.mass.gov/ig

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Executive Summary

In 2013, the Legislature created the Bureau of Program Integrity (Bureau) within the Office of the Inspector General (Office) to monitor the quality, efficiency, and integrity of public benefits programs administered by the Executive Office of Health and Human Services.

In July 2014, the Bureau released a review of the Work Program Requirement (Work Requirement) of the Transitional Aid to Families with Dependent Children (TAFDC) program.¹ In its review, the Bureau found that the Department of Transitional Assistance (Department) and its case managers were not engaging in timely and thorough self-sufficiency planning with TAFDC recipients to help them transition away from dependence on cash assistance. Also in July 2014, Governor Deval Patrick signed Chapter 158 of the Acts of 2014, “An Act to Foster Economic Independence” (Welfare Reform Statute), which introduced Pathways to Self-Sufficiency (Pathways) as a new model for TAFDC intake.

The Bureau submits this report as a follow-up to its July 2014 review of the Work Requirement. During the past two years, the Bureau has engaged in ongoing risk assessment as the Department planned and implemented changes to the Work Requirement. The Department has provided the Bureau with broad transparency and access during this process. Leading up to this report, the Bureau and the Department have discussed risks and related recommendations at monthly meetings. As a result of these discussions, the Department provided an update on its plans and initiatives related to the TAFDC program and the Work Requirement, which the Bureau included in this report.

The report is divided into two distinct parts. Part One is focused on the Department’s intake processes and the extent to which they support the Work Requirement. Part Two is focused on larger contextual issues related to the Work Requirement and workforce development resources for TAFDC recipients, both within and outside of the Department.

In Part One of this report, the Bureau provides a preliminary evaluation of the Department’s implementation of the Pathways model and the role of the Self-Sufficiency Specialist, both of which were required under the Welfare Reform Statute. Part One includes the Bureau’s recommendations for the Department as it moves forward with other initiatives related to the TAFDC program and the Work Requirement.

In Part Two, the Bureau reviews expenditures under the Temporary Assistance for Needy Families (TANF) block grant and discusses the implementation of the Workforce Investment and Opportunity Act (WIOA). Part Two includes recommendations for administering the TANF block grant and WIOA more efficiently and effectively.

¹ A copy of the review can be found online at: <http://www.mass.gov/ig/publications/reports-and-recommendations/2014/bureau-of-program-integritys-review-of-the-work-program-requirement-for-transitional-aid-to-families-with-dependent-children.pdf>.

The Bureau found that, despite some implementation challenges, the Department has taken important steps toward improving the administration of the Work Requirement. However, the Bureau found that the Department missed opportunities to engage field staff in the planning and implementation of the Pathways model. Moving forward, the Department must commit to continuous improvement and building efficient and effective processes to support the Work Requirement. More specifically, the Bureau recommends that the Department:

- Fully engage its staff to evaluate and mitigate risks prior to implementing new initiatives, policies, procedures, operations plans, and system changes;
- Build the knowledge base, skills, and tools of its staff to assess and engage in self-sufficiency planning with recipients;
- Track outcomes for TAFDC recipients with relevant, purposeful, and reliable metrics; and
- Identify “high-risk” TAFDC recipients and define and coordinate the roles of field staff who assist them.

Through its review of the TANF block grant and WIOA, the Bureau found that there is an immediate need to coordinate resources for workforce development. Because the Department and other agencies administering programs and services related to workforce development share clients, they should streamline services and jointly monitor whether their services are promoting self-sufficiency. The Bureau recommends that:

- Secretariats and agencies that administer TANF-funded programs and services should plan and execute a joint strategy for utilizing the TANF block grant, track outcomes from the programs and services, and prioritize helping low-income families achieve self-sufficiency; and
- The Department should establish partnerships across other secretariats and agencies to ensure that TAFDC recipients have access to all available and appropriate workforce development resources.

Introduction

I. The Office of the Inspector General

The Office of the Inspector General (Office) was created in 1981 for the purpose of preventing and detecting fraud, waste, and abuse in the expenditure of public funds.² The Office seeks to prevent fraud, waste, and abuse by implementing a three-part strategy: early intervention, education, and the provision of technical assistance. The Office also conducts civil and criminal investigations related to fraud, waste, and abuse, and coordinates with state and federal prosecutors to target individual wrongdoing. The Office is an independent agency, separate and apart from the Executive Branch. The Inspector General is appointed by a majority vote of the Attorney General, the State Auditor, and the Governor for a term of five years.³

In order to carry out its mandate, the Office is authorized to supervise, coordinate, and conduct audits, investigations, and reviews related to the expenditure of public funds by state agencies.⁴ Additionally, the Office recommends policy adjustments, procedural improvements, and legislative initiatives, and can oversee the implementation of suggested policies at an agency's request.⁵ The Office has broad inspection and summons powers in order to pursue its investigations.⁶

The Office is organized into seven divisions: Administrative and Finance; Legal; Audit, Oversight and Investigations; Regulatory and Compliance; Policy and Government; the Internal Special Audit Unit; and the Bureau of Program Integrity.

II. The Bureau of Program Integrity

Established in August 2013, the Bureau of Program Integrity (Bureau) is charged with monitoring the quality, efficiency, and integrity of public benefits programs administered by the Executive Office of Health and Human Services (EOHHS).

In creating the Bureau, the Legislature outlined the following duties in G.L. c. 6A, § 16V:

- Monitor the quality, efficiency, and integrity of EOHHS programs;
- Prevent, detect, and correct fraud, waste, and abuse;
- Review current eligibility intake and determination procedures for public benefit programs administered by EOHHS;

² M.G.L. c. 12A, § 7.

³ Id. § 2.

⁴ Id. § 8.

⁵ Id.

⁶ Id. § 9.

- Assist in development of any new intake procedures and regulations for eligibility determination;
- Monitor whether eligibility regulations are being followed by the administering agency;
- Assist with the coordination of other state agencies to transmit and collect data on beneficiaries;
- Coordinate with the Program Integrity Division under the Department of Transitional Assistance;
- Provide training to employees on methods of intake procedures and eligibility determinations;
- Automate reporting of indicators of potential fraud cases; and
- Coordinate and consult on eligibility verification for recipients of benefit programs through the sharing of information with other agencies and departments.

In addition, in a separate statutory mandate, the Legislature required that the Bureau consult with the Department of Transitional Assistance (Department) to develop a fraud detection program.⁷

In February 2014, the Bureau released its first report entitled, “The Bureau of Program Integrity’s 2013-2014 Review of the Department of Transitional Assistance.” In this report, the Bureau responded to a specific legislative mandate in Section 184 of Chapter 38 of the Acts of 2013 and made recommendations for improving eligibility processing, program integrity efforts, and management and operations at the Department. Later in 2014, the Bureau released “The Bureau of Program Integrity’s Review of the Work Program Requirement for Transitional Aid to Families with Dependent Children” (July 2014 Review). In this review, the Bureau focused on the status of the Department’s administration of the Work Requirement.

III. The Department of Transitional Assistance

The Department administers both state and federally-funded cash and food-assistance programs. As of September 2016, the Department had 23 field offices – known as Transitional Assistance Offices (TAOs) – throughout the Commonwealth and approximately 1600 employees. Today, the Department serves one out of every nine people in Massachusetts, including working families, children, elders, and people with disabilities.⁸ The Department’s mission statement is:

To assist and empower low-income individuals and families to meet their basic needs, improve their quality of life, and achieve long-term economic self-sufficiency.

⁷ M.G.L. c. 18, § 36.

⁸ Dep’t of Transitional Assistance, DTA Performance Scorecard (Oct. 2016), available at: <http://www.mass.gov/eohhs/docs/dta/perfcard.pdf>.

The Department administers two cash assistance programs: Transitional Aid to Families with Dependent Children (TAFDC) and Emergency Aid to the Elderly, Disabled, and Children (EAEDC). In addition, the Department administers the Supplemental Nutrition Assistance Program (SNAP)⁹ and the State Supplement Program (SSP).¹⁰

IV. Transitional Aid to Families with Dependent Children

The TAFDC program is a cash assistance program for families funded by both federal and state funds. To be eligible for TAFDC, recipients must have at least one dependent child under 18 (or under 19 if the dependent child is still in high school) or be pregnant and within 120 days of the expected date of birth. TAFDC recipients must also meet income and asset limits. To be eligible, recipients may not own countable assets collectively valued at over \$2,500 and may not receive earned or unearned income over limits set according to a variety of criteria.¹¹ Recipients must also be United States citizens or eligible non-citizens, reside in Massachusetts, and comply with a variety of program standards in state and federal regulations.¹² As of August 2016, the TAFDC program benefited approximately 32,000 households in Massachusetts, and the average cash benefit distribution per household for fiscal year 2016 was \$447 per month.¹³

A. The Work Requirement

TAFDC includes a Work Program Requirement (Work Requirement) to underscore the transitional nature of cash assistance and to comply with federal law. The Work Requirement is a mandate to participate in a work-related activity for 20 or 30 hours per week, depending on the age of the children in the assistance unit. Examples of work-related activities include working at a job, participating in an education or training activity through a Department vendor or a community-based agency, or participating in community service. Recipients who fulfill their work requirement are also eligible for additional benefits such as transportation and child care. For all recipients subject to the Work Requirement, TAFDC benefits are limited to a cumulative maximum of 24 months in a continuous 60-month period.¹⁴ In the July 2014 Review, the Bureau determined that 31.06% (14,634) of TAFDC recipients were subject to the Work Requirement at that time.

In Massachusetts, there are several exemptions to the Work Requirement, as defined in 106 CMR 203.100(A)(1)(a)-(h). The exemptions include:

- disabled recipients;

⁹ SNAP benefits offer nutrition assistance to eligible, low-income individuals and families.

¹⁰ SSP is a cash supplement payment available to those who qualify for Supplemental Security Income (SSI).

¹¹ See 106 CMR 204.010, et seq.

¹² See 45 CFR 206.10; 106 CMR 203.000.

¹³ See Dep't of Transitional Assistance, Facts and Figures (Oct. 2016), available at: <http://www.mass.gov/eohhs/docs/dta/facts-figures/dta-fac-figures-oct16.pdf>.

¹⁴ See 106 CMR 203.200(A). Department regulations allow a process for requesting an extension of benefits past the 24-month benefits period in limited circumstances. See also 106 CMR 203.210.

- recipients who are essential to the care of a disabled person living in the home;
- recipients who are in their 33rd week or later of pregnancy or who produce documentation of a pregnancy-related medical condition that prevents the recipient from working;
- recipients whose youngest child in the assistance unit is under two years old;
- recipients whose youngest child is not included in the assistance unit and under three months old;
- teen parent recipients under the age of twenty and attending high school or an equivalency program;
- recipients who are ineligible non-citizens and do not have legal employment status; and
- recipients who are 66 years of age or older.

Exemptions stop the 24-month clock for TAFDC benefits.¹⁵ As a result, recipients who continue to qualify for at least one of the exemptions can receive TAFDC benefits for longer than 24 months. In the July 2014 Review, the Bureau found that 68.94% (32,481) of TAFDC recipients were exempt and not subject to the work requirement.

B. Chapter 158 of the Acts of 2014: An Act to Foster Economic Independence

On July 7, 2014, Governor Deval Patrick signed into law Chapter 158 of the Acts of 2014, “An Act to Foster Economic Independence” (Welfare Reform Statute).

Part One of this report focuses on the Welfare Reform Statute’s mandates related to TAFDC intake and self-sufficiency planning. The relevant provisions are summarized below:¹⁶

- The statute established the “Pathways to Self-Sufficiency” (Pathways) program.¹⁷ According to the statute, the purpose of Pathways is to assist TAFDC recipients in gaining permanent employment and financial independence.¹⁸ Recipients work with their TAFDC case managers to assess their relevant job skills and experience and identify appropriate employment opportunities.¹⁹ The statute requires ongoing monitoring of recipients who are participating in an educational or training program and written findings in the recipients’ case files about the reasons for unsuccessful

¹⁵ See 106 CMR 203.200(A)(3).

¹⁶ While the Welfare Reform Statute also changed certain TAFDC eligibility standards and provided for improvements to fraud detection, among other important changes, the focus of this report will be the Department’s recently-implemented changes to the Work Requirement.

¹⁷ M.G.L. c. 118, § 3C(a).

¹⁸ Id.

¹⁹ Id.

outcomes.²⁰ The Legislature mandated data collection and reporting on Pathways and its impact on TAFDC recipients.²¹

- The statute requires those TAFDC applicants who are subject to the Work Requirement to participate in a job search prior to receiving benefits.²² The Department named this program requirement the “Pre-Benefits Job Search.”²³ TAFDC applicants are required to provide evidence of this job search by returning to the Department a list of recent job contacts, including the name of the person with whom the applicant spoke, a telephone number, and the date of the contact.²⁴ If the applicant fails to return this list within 60 days of applying, the applicant, and in some circumstances the children in the assistance unit, will be deemed ineligible for TAFDC benefits.²⁵
- The statute created a new specialist role, which the Department later named “Self-Sufficiency Specialist.”²⁶ The Legislature intended the role to “focus on providing targeted employment and training assistance to recipients that the [D]epartment determines have a high risk of long-term dependence on state benefits and require specialized assistance to achieve economic independence.”²⁷ According to the statute, at least one of these specialists must be assigned to each TAO and the caseload of each specialist must be limited to 60 cases.²⁸ The Legislature mandated data collection and reporting to track the impact of Self-Sufficiency Specialists on outcomes for TAFDC recipients.²⁹

An additional provision of the statute changes the definition of “disabled” for purposes of qualifying for an exemption from the Work Requirement.³⁰ The Department is currently preparing to implement this change.

²⁰ Id. § 3C(c).

²¹ Id. § 3C(d).

²² There are two categories of initial job searches described in the regulations, one for work-ready recipients and a second for those less ready for employment. 106 CMR 702.125(G)(2)-(3). Recipients who are exempt from the Work Requirement are not mandated to complete an initial job search. 106 CMR 702.125(G)(2)(b); 106 CMR 702.125(G)(3)(a). Also, there are exceptions for individuals who are enrolled in substance abuse and other programs. 106 CMR 702.125(G)(4).

²³ Dep’t of Transitional Assistance, Online Guide: Pathways Initial Screen, available at: http://webapps.ehs.state.ma.us/DTA/PolicyOnline/!SSL!/WebHelp/TAFDC/ESP/ESP_PSS_Assessment/Pathways_Initial_Screen.htm (last updated June 24, 2016) [hereinafter Online Guide: Pathways Initial Screen].

²⁴ M.G.L. c. 118, § 13(b).

²⁵ 106 CMR 702.125(G)(2)(d); 106 CMR 702.125(G)(3)(c).

²⁶ M.G.L. c. 18, § 5; see also Dep’t of Transitional Assistance, Online Guide: Self-Sufficiency Specialist, http://webapps.ehs.state.ma.us/DTA/PolicyOnline/!SSL!/WebHelp/TAFDC/Services/Self-Sufficiency_Specialist/Self-Sufficiency_Specialist.htm (last updated Aug. 26, 2016).

²⁷ M.G.L. c. 18, § 5.

²⁸ Id.

²⁹ Id.

³⁰ See 1995 Mass. Acts c. 5, § 110(e), as amended by 2014 Mass. Acts c. 158, § 24.

V. Temporary Assistance for Needy Families

The Temporary Assistance for Needy Families (TANF) program was created by Congress in 1996. It is focused on transitioning families to self-sufficiency.³¹ States have flexibility to design their own TANF-funded benefits programs, but there are mandatory components. The maximum time limit for benefits is 60-months, and recipients must fulfill the Work Requirement, explained above. In addition, states must meet their Work Participation Rate, a metric for performance created and administered by the federal Administration for Children and Families (ACF).

The TANF program provides a block grant to each state to fund a variety of services and programs.³² The TANF block grant provides \$16.5 billion annually across the 50 states and the District of Columbia, and Massachusetts receives \$459 million for this grant.³³ The amount of funding each state receives is a fixed figure and has not changed since Congress created the TANF program in 1996.³⁴ States are required to contribute a minimum amount annually, known as the “maintenance of effort” (MOE) requirement, to TANF-related populations and activities.³⁵ Together, the block grant and the MOE expenditures support a variety of programs and services.

States have flexibility in terms of how they spend TANF and MOE funds, but expenditure of these funds must align with at least one of the following TANF purposes:

- Provide assistance to needy families so that children can be cared for in their own homes;
- Reduce the dependency of needy parents by promoting job preparation, work, and marriage;
- Prevent and reduce the incidence of out-of-wedlock pregnancies; and
- Encourage the formation and maintenance of two-parent families.³⁶

Each state must file a quarterly report (called an ACF-196 report) detailing TANF and MOE expenditures. On average, states spend approximately one-quarter of their combined TANF and MOE funds on cash assistance programs for needy families.³⁷ In Massachusetts,

³¹ See 42 U.S.C. §§ 601-619.

³² See Office of Family Assistance, Admin. for Children and Families, TANF Home, <http://www.acf.hhs.gov/ofa/programs/tanf> (last visited Nov. 9, 2016).

³³ Gene Faulk, Cong. Research Serv., R40946, The Temporary Assistance for Needy Families Block Grant: An Introduction (Oct. 23, 2013), p. 1, 14, available at: <http://www.fas.org/sgp/crs/misc/R40946.pdf> [hereinafter Falk, TANF Introduction].

³⁴ *Id.* at 1.

³⁵ See 45 CFR §§ 263.1-263.9.

³⁶ See Office of Family Assistance, Admin. for Children and Families, TANF Home, <http://www.acf.hhs.gov/ofa/programs/tanf> (last visited Nov. 2, 2016).

³⁷ See Office of Family Assistance, Admin. for Children & Families, U.S. Dep’t of Health & Human Services, TANF and MOE Spending and Transfers by Activity, FY 2015: United States (last updated Aug. 18, 2016),

TANF funds support TAFDC benefits and child care benefits, and are also used to support other budget expenditures across multiple agencies and secretariats.

VI. Workforce Investment Opportunity Act

The Workforce Investment and Opportunity Act (WIOA), enacted in July 2014, is a federal statute that appropriates funds for workforce development programs and services and mandates partnerships and collaboration around workforce development at state and local levels. Unlike its predecessor statute, the Workforce Investment Act (WIA), which was enacted in 1998, WIOA specifically mandates partnerships between labor and workforce development agencies and human service agencies administering TANF benefits programs. It also requires “One-Stop Career Centers,” community-based offices under the administration of labor and workforce development agencies that provide assistance to the unemployed, to prioritize TANF benefits recipients for services and programs. In Massachusetts, WIOA requires the Executive Office of Labor and Workforce Development (EOLWD) and the Department to streamline and integrate resources for TAFDC recipients through statewide and local collaboration. The planning process for this is under way.

VII. Glossary

Because this report contains a number of abbreviations and terms related to the Department’s programs and processes, the Bureau provides the following glossary as a guide for the reader:

- **Administration for Children and Families (ACF):** ACF, a division of the United States Department of Health and Human Services, is responsible for federal programs that promote the economic and social well-being of children, families, individuals, and communities.
- **BEACON:** BEACON is the online case management system used by Department employees to gather and store all benefit recipient case details, calculate eligibility, and automate case notices.
- **Competitive Integrated Employment Services (CIES):** CIES vendors are outside vendors procured by the Department to provide recipients with skills training, job development, and job placement.
- **Employment Development Plan (EDP):** The EDP is a self-sufficiency plan developed as a result of an employability assessment. It summarizes the employment goals of the TAFDC recipient and lists the training components and work activities for which the recipient is eligible.
- **Employment Services Program (ESP):** The ESP is a state-funded program that engages TAFDC recipients in gaining basic skills necessary for employment.

available at: https://www.acf.hhs.gov/sites/default/files/ofa/fy2015_tanf_moe_national_data_pie_charts.pdf. (See Appendix A).

- **Executive Office of Health and Human Services (EOHHS):** EOHHS is the largest secretariat in Massachusetts and is charged with overseeing agencies that provide a variety of services impacting the health and well-being of the citizens of the Commonwealth.
- **Executive Office of Labor and Workforce Development (EOLWD):** EOLWD provides oversight and assistance to businesses, workers, and jobseekers and plays a vital role in the economic health and growth of the Commonwealth.
- **Good Cause:** Good Cause is the reason that a TAFDC applicant or recipient may have for failing to meet one of the program requirements. Reasons for good cause include lack of appropriate child care, lack of transportation, family emergency, and disability.
- **Intake:** An intake is the initial period of a TAFDC application, which includes an interview with an applicant during which the Department asks the applicant basic questions to assess eligibility for state benefits.
- **Maintenance of Effort (MOE):** The MOE is the minimum amount of funding states are required by the federal government to contribute towards TANF-related populations and activities in order to receive their TANF block grant each year.
- **Memorandum of Understanding (MOU):** In the context of WIOA implementation, an MOU is an agreement between or among implementation partners. MOUs lay out the respective roles, duties, obligations, responsibilities, and expectations of partners for WIOA implementation.
- **Online Guide:** The Online Guide is an online resource available to all of the Department's staff that includes links to all of the Department's policies governing each of the benefits issued by the Department.
- **Pathways to Self-Sufficiency (Pathways):** The Legislature outlined Pathways in the Welfare Reform Statute as a new model for TAFDC intake and assessment intended to assist TAFDC recipients in gaining permanent employment and financial independence.
- **Pathways to Self-Sufficiency Assessment (PSS Assessment):** A PSS Assessment is required of most work-required TAFDC recipients. The PSS Assessment interview is a series of questions that lead to discussions with recipients about their strengths and challenges with finding employment. The PSS Assessment could lead to referrals to employment and training specialists or other programs or services to help recipients overcome their challenges with finding employment.
- **Pre-Benefits Job Search (PBJs):** The PBJs is the job search process certain applicants must complete as an eligibility requirement for TAFDC benefits. Applicants have 60 days in which to complete two job search logs that document contacts made with potential employers, otherwise risking denial of eligibility.
- **Pre-Benefits Job Search Screening (PBJs Screening):** The PBJs Screening is conducted at the first appointment with a TAFDC applicant. It is a series of eight

questions, the outcome of which determines whether the applicant is exempt from the work requirement, and if not, which PBJs program the applicant falls into.

- **Self-Sufficiency Specialist:** A specialist employed by each local TAO who is legislatively mandated to work with teen parents and other TAFDC recipients who are determined to be at “high risk of long-term dependence” on state benefits.
- **Temporary Assistance for Needy Families (TANF):** TANF is a federal program that provides a block grant to states for use to achieve at least one of four goals: (1) provide assistance to needy families so that children can be cared for in their own homes; (2) reduce the dependency of needy parents by promoting job preparation, work, and marriage; (3) prevent and reduce the incidence of out-of-wedlock pregnancies; and (4) encourage the formation and maintenance of two-parent families.
- **Transitional Aid to Families with Dependent Children (TAFDC):** TAFDC is the Massachusetts cash assistance program under TANF for families with children and pregnant women within the last 120 days of pregnancy. To qualify for TAFDC benefits, recipients must be within certain income and asset limits, while also meeting citizenship and residency requirements.
- **Transitional Assistance Office (TAO):** The TAOs are local assistance offices that service applicants’ and recipients’ needs. There are 23 TAOs located throughout the Commonwealth. TAOs are staffed with a Director, Assistant Director, and program-based supervisors and case managers, as well as various specialists.
- **Workforce Innovation and Opportunity Act (WIOA):** WIOA is federal legislation designed to strengthen and improve the public workforce by assisting those with barriers to employment obtain employment. WIOA mandates partnerships between labor and workforce development agencies and human service agencies administering TANF benefits programs.
- **Work Participation Rate (WPR):** The WPR is the primary federal metric for the TANF program. It is calculated using a formula focused on the overall participation of benefits recipients in the Work Requirement.
- **Work Program Requirement (Work Requirement):** The Work Requirement is a mandate for certain TAFDC recipients to participate in a work-related activity for 20 or 30 hours per week, depending on the age of the children in the assistance unit. Work-related activities include working at a paying job, participating in an education or training activity, or participating in community service.

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Part One

I. Scope and Approach

In this section, the Bureau provides a preliminary evaluation of the Department's implementation of the Pathways model and the role of the Self-Sufficiency Specialist. The Bureau's evaluation focuses on new processes and their initial impact on the Department's administration of the Work Requirement. As a backdrop to the evaluation, the Bureau outlines relevant statutory and regulatory provisions and describes how the Department implemented them.

The Department's commitment to transparency has provided the Bureau with extensive access to review the implementation of the Pathways model and the role of the Self-Sufficiency Specialist. With this access, the Bureau engaged in ongoing risk assessment while the Department moved forward with program development and implementation. The Bureau gained a valuable perspective on the Department's work, both before and immediately after Pathways implementation.

The most important aspect of the Bureau's methodology was conducting field visits to Transitional Assistance Offices (TAO). The Bureau conducted two series of TAO visits: one from February to April 2016 and another in July and August 2016. During the TAO visits, the Bureau interviewed Self-Sufficiency Specialists, TAFDC case managers, TAFDC supervisors, and TAO Directors. The Bureau also observed intake interviews. The Bureau relied heavily on interviews with field staff and observations to evaluate the Department's implementation of the Pathways model and the role of the Self-Sufficiency Specialist.

The Bureau met with the Department's Central Office managers to discuss their plans for program development and implementation. Through periodic advisory letters, the Bureau provided incremental feedback on the new intake and assessment model.

The Bureau observed the training sessions for the Pathways model and the role of the Self-Sufficiency Specialist. The Bureau provided feedback on these training sessions and made recommendations for improving the Department's training curriculum for the Work Requirement.

The Bureau also conducted research to frame recommendations for the Department. For example, the Bureau identified a model assessment tool, the Online Work Readiness Assessment (OWRA), developed by the federal Administration for Children and Families. The Bureau researched assessment tools used by other states and arranged for the Department to consult with TANF program leaders in Connecticut and New Hampshire.

As part of implementing the Pathways model, the Department made changes to BEACON, its eligibility and case management database. Before Pathways implementation, the Bureau reviewed BEACON data and data fields used for TAFDC self-sufficiency planning and outcomes. The Bureau also studied the new data fields that the Department created on BEACON to support the Pathways model. However, the Bureau could not analyze the efficiency or

effectiveness of the Pathways model using the Department’s data. The Department reported that it is in the process of fixing issues with BEACON enhancements, testing the reliability of data in the new data fields, and creating new data reports for the TAFDC program.

II. The Pathways to Self-Sufficiency Intake Model

A. Background

In this section, the Bureau summarizes the statutory and regulatory authority for the Pathways model. The statute defined the Pathways to Self-Sufficiency program as a program designed to promote the financial independence of families receiving TAFDC through permanent job placement.³⁸ In furtherance of this goal, the statute requires the Department to assess TAFDC applicants’ job skills and experience and “match” them with appropriate employment.³⁹

The Pathways model includes an intake component and employment assessment component. As part of the intake component, there is a screening interview for an initial job search requirement, which the Department has named the Pre-Benefits Job Search (PBJs).⁴⁰ The PBJs Screening directs TAFDC applicants into one of two different programs based on their employment skills and experience.⁴¹ The two programs are called Work Ready and Initial Job Search. The Department’s regulations require TAFDC applicants in both programs to provide evidence of a job search within 60 days of their application for benefits, including documentation of job contacts.⁴² Department regulations also identify consequences for applicants who fail to participate in a PBJs program. The consequences differ depending on the PBJs program and when the failure occurs, but can include the denial of benefits to an individual TAFDC applicant or the closing of a TAFDC case for the entire assistance unit.⁴³

Not all TAFDC applicants are required to participate in a PBJs program. The Department’s regulations exempt or excuse certain TAFDC applicants from participation in a PBJs program, including applicants who are exempt from the Work Requirement, have a disability, attend secondary school full-time, participate in an education or training activity, or participate in an inpatient substance abuse treatment program licensed or approved by the Department of Public Health.⁴⁴

If an applicant is required to participate in a PBJs program but fails to submit sufficient evidence of a job search, the applicant can claim good cause based on child care issues,

³⁸ M.G.L. c. 118, § 3C(a).

³⁹ Id.

⁴⁰ 106 CMR 702.125(G).

⁴¹ Id. 702.125(G)(2)-(3).

⁴² Id.

⁴³ 106 CMR 702.125(G)(2)(d); 106 CMR 702.125(G)(3)(c).

⁴⁴ 106 CMR 702.125(G)(2)(b); 106 CMR 702.125(G)(3)(a); 106 CMR 702.125(G)(4)-(5).

transportation issues, family emergency, disability, or other reasons identified in the Department's regulations. The Department can then authorize a waiver of the consequences for failing to complete the PBJs.⁴⁵

With regard to employment assessment, the Department's regulations require an initial assessment interview (assessment) for the purpose of completing an Employment Development Plan (EDP).⁴⁶ The assessment must include discussions about the following:

- the recipient's educational and employment background;
- the available services to assist with obtaining and maintaining a job;
- the requirements of the Employment Service Program (ESP); and
- the available paths towards employment that reflect each recipient's level of skills and experience, known as ESP components.⁴⁷

The regulations further require that a case manager assess the recipient's abilities, skills, barriers, work history, education, and areas of professional interest.⁴⁸ Case managers must conduct the initial assessment "at the time of application or eligibility review."⁴⁹ Based on this assessment, the case manager must help the recipient develop an EDP for self-sufficiency.⁵⁰ The plan should include a recipient's employment goals, appropriate support services, such as transportation and child care, and employment activities that will help the recipient achieve these goals.⁵¹

The Department conducts periodic reviews of each TAFDC recipient's circumstances in order to establish that the recipient remains eligible to receive assistance.⁵² The Department is also required to periodically review each recipient's EDP and participation in work activities.⁵³ The review includes a reassessment if the recipient is not employed or has not achieved self-sufficiency goals.⁵⁴

⁴⁵ M.G.L. c. 118, § (13)(a); 106 CMR 702.125(I).

⁴⁶ 106 CMR 207.110(A)(2).

⁴⁷ Id.

⁴⁸ Id. 207.110(A)(3).

⁴⁹ Id. 207.110(A)(2).

⁵⁰ Id. 207.110(A)(3)-(4).

⁵¹ Id. 207.110(A)(4).

⁵² Id. 702.200.

⁵³ Id. 207.110(C).

⁵⁴ Id.

B. The Department's Implementation

In this section, the Bureau describes how the Department implemented the statutory and regulatory provisions outlined above. The Department created new processes on BEACON to support the PBJs Screening and the PSS Assessment interview. The processes involve standardized interview questions presented on BEACON screens, complemented by data entry fields.⁵⁵ Field staff must complete data entry in each field before moving on to the next screen. During TAFDC intake and assessment, case managers ask several questions focused on employment and education. Before allowing case managers to complete the interviews, BEACON checks the data that they enter for internal consistency among the applicant's answers to the questions.

The PBJs Screening involves eight questions.⁵⁶ Based on the responses, BEACON automatically determines whether the applicant is required to engage in the PBJs, and whether the applicant is in the Work Ready or Initial Job Search program.⁵⁷ BEACON generates a letter to the applicant explaining the requirements for the PBJs, a "job search log," and the list of "good cause" reasons that the applicant may cite to claim good cause.⁵⁸

The Department requires that applicants make three employment-related "contacts" during the first 30 days after the TAFDC application, as well as three additional contacts for the time period between 31-60 days after the application.⁵⁹ The Department mandates attendance at its orientation session for TAFDC applicants, and it determined that attendance would count as one contact during the first 30 days after the TAFDC application.⁶⁰

An applicant must submit a job search log for each 30-day period of the PBJs.⁶¹ On the job search log, the applicant must provide details about the contacts and sign a sworn

⁵⁵ See Online Guide: Pathways Initial Screen; see also Dep't of Transitional Assistance, Online Guide: Assessment Questions Strengths, available at: http://webapps.ehs.state.ma.us/DTA/PolicyOnline/!SSL!/WebHelp/TAFDC/ESP/ESP_PSS_Assessment/Assessment_Questions_Strengths.htm (last updated June 24, 2016) [hereinafter Online Guide: Assessment Questions Strengths]; Dep't of Transitional Assistance, Online Guide: Assessment Questions Challenges, http://webapps.ehs.state.ma.us/DTA/PolicyOnline/!SSL!/WebHelp/TAFDC/ESP/ESP_PSS_Assessment/Assessment_Questions_Challenges.htm (last updated June 24, 2016) [hereinafter Online Guide: Assessment Questions Challenges].

⁵⁶ See Online Guide: Pathways Initial Screen.

⁵⁷ Id.

⁵⁸ Dep't of Transitional Assistance, Online Guide: TAFDC Notices, available at: <http://webapps.ehs.state.ma.us/DTA/PolicyOnline/ol%20docs/notice/pathway-notices/initial-job-search.pdf> (last visited Nov. 2, 2016).

⁵⁹ Dep't of Transitional Assistance, Online Guide: Work Ready Client Responsibilities, http://webapps.ehs.state.ma.us/DTA/PolicyOnline/!SSL!/WebHelp/TAFDC/ESP/ESP_PSS_Assessment/Work_Ready_Client_Responsibilities.htm (last updated Sept. 30, 2016) [hereinafter Online Guide: Work-Ready Client Responsibilities].

⁶⁰ See Online Guide: Work-Ready Client Responsibilities. The Department's Orientation provides recipients with a description of the Work Requirement, opportunities to learn about ESP programs and services, and information on child-care services. 106 CMR 207.100.

⁶¹ See Online Guide: Work-Ready Client Responsibilities; Dep't of Transitional Assistance, Online Guide: Initial Job Search Client Responsibilities, http://webapps.ehs.state.ma.us/DTA/PolicyOnline/!SSL!/WebHelp/TAFDC/ESP/ESP_PSS_Assessment/Initial_Job_Search_Client_Responsibilities.htm (last updated Sept. 30, 2016) [hereinafter Online Guide: Initial Job Search Client Responsibilities].

verification.⁶² Case managers review job search logs and enter the job contacts listed on the logs into BEACON.⁶³

The PSS Assessment is a structured 15-30 minute interview based on a Department-designed assessment tool. The interview includes more detailed questions about the applicant's employment and education than the PBJs Screening.⁶⁴ It also includes specific questions about skills and interests, as well as "strengths" and "challenges."⁶⁵ All of the information gathered during the PSS Assessment is recorded in BEACON. The Department has eliminated handwritten application forms and self-sufficiency plans, which the Bureau discussed in the July 2014 Review.

The PSS Assessment presents opportunities for case managers to identify appropriate resources for TAFDC recipients. For example, if the recipient indicates any learning difficulties, the case manager can administer an additional learning disability screening and refer the recipient for a full evaluation.⁶⁶ If the recipient discloses domestic violence issues or safety concerns, the case manager sends a referral to the Domestic Violence Unit within the Department for support and services.⁶⁷ If the recipient has had past involvement with or has a current need for other human services agencies, such as the Department of Public Health, the Department of Mental Health, or the Massachusetts Rehabilitation Commission, the Department provides contact information for the appropriate human services agency or the "211" state resources hotline.⁶⁸ There is no structured referral process to connect recipients with other state human services agencies.

As part of the PSS Assessment, the case manager is required to classify the recipient's level of education, skills, and employment experience and identify next steps for the recipient.⁶⁹ One potential next step may include enrollment in a local Department-funded employment or skills development program called a Competitive Integrated Employment Services (CIES) program.⁷⁰ Other potential next steps could be referring a recipient to obtain a HiSET certificate, to enroll in English as a Second Language classes, or to participate in a privately-funded,

⁶² Id.

⁶³ Id.

⁶⁴ See Dep't of Transitional Assistance, Online Guide: PSS Assessment Introduction, http://webapps.ehs.state.ma.us/DTA/PolicyOnline/!SSL!/WebHelp/TAFDC/ESP/ESP_PSS_Assessment/PSS_Assessment_Introduction.htm (last updated Aug. 5, 2016).

⁶⁵ Id.

⁶⁶ See Online Guide: Assessment Questions Challenges.

⁶⁷ Dep't of Transitional Assistance, Online Guide: Assessment Referrals, http://webapps.ehs.state.ma.us/DTA/PolicyOnline/!SSL!/WebHelp/TAFDC/ESP/ESP_PSS_Assessment/Assessment_Referrals.htm (last updated June 24, 2016).

⁶⁸ Id.

⁶⁹ See Online Guide: Assessment Questions Strengths.

⁷⁰ See Dep't of Transitional Assistance, Online Guide: Assessment EDP, http://webapps.ehs.state.ma.us/DTA/PolicyOnline/!SSL!/WebHelp/TAFDC/ESP/ESP_PSS_Assessment/Assessment_EDP.htm (last updated June 24, 2016).

community-based program.⁷¹ Historically, these referrals have been left to the discretion of the case manager, within certain parameters, and the Department did not make any changes in this area while implementing PSS Assessment. At the conclusion of the PSS Assessment, the case manager prints a pre-filled EDP with the recipient’s responses to the assessment questions and the case manager’s referrals to programs and services.⁷²

Under the Pathways model, the PSS Assessment does not occur at the initial intake interview.⁷³ The Department requires that case managers schedule a separate appointment for PSS assessment within five days after eligibility for TAFDC benefits is determined.⁷⁴ BEACON will automatically schedule this appointment and send a letter to the recipient if the case manager has not done so within the required time frame.⁷⁵ If a recipient fails to keep an appointment for a PSS Assessment, the Department initiates case closing procedures.

Pathways Timeline

Day 1	By Day 30	By Day 60
<p>Applicant applies for TAFDC Benefits</p> <p>Case manager conducts PBJs Screening</p>	<p>Applicant must submit first job search log and:</p> <ul style="list-style-type: none"> • attend orientation as 1 job search contact • provide 2 additional job search contacts <p>Case manager schedules PSS Assessment or BEACON automatically schedules it 5 days after case approval</p>	<p>Applicant must submit second job search log and:</p> <ul style="list-style-type: none"> • provide 3 additional job search contacts

Prepared by: Office of the Inspector General

The Department prepared staff for the implementation of the Pathways model through electronic communications and provided training in May and June 2016. In May 2016, Central Office managers led information sessions about the Pathways model for TAFDC field staff at each TAO. The information sessions highlighted the principles and goals of the Pathways model

⁷¹ Id.

⁷² Id.

⁷³ See Online Guide: PSS Assessment Introduction.

⁷⁴ Id.

⁷⁵ Id.

and what the Department described as a “culture change” within the Department to focus on self-sufficiency planning for TAFDC recipients. They also provided a basic overview of the Department’s new approach to engagement with TAFDC recipients during the first 60 days of the TAFDC application period, including the PBJs and the PSS Assessment.

In June 2016, the Department held a series of mandatory training webinars for TAFDC field staff, including case managers, supervisors, and specialists. Three of the webinars were skills-oriented and focused on time management, motivational interviewing, and managing difficult conversations with recipients. The fourth webinar focused on changes to the BEACON system and was held two business days prior to the implementation of the new Pathways model. This webinar included a mock intake interview and a mock assessment interview with images of the new BEACON screens and data fields. The Department’s training webinars only allowed for questions and answers posted online after the training presentation. The Department did not provide field staff with hands-on access to experiment with the new BEACON processes, screens, or data entry fields prior to Pathways implementation.

As preparation for Pathways implementation, the Department outlined new duties for staff in performance evaluations to reflect the new roles of TAFDC case managers, supervisors, and specialists under the Pathways model. After the new performance evaluations were distributed, the Central Office asked TAFDC supervisors to review them with their staff. The Department did not incorporate the new performance evaluations into role-specific training during Pathways implementation.

On June 27, 2016, the Pathways model “went live” in BEACON, and field staff used the new BEACON processes for the first time. The Department designated program management and IT staff in the Central Office to document and respond to reports about problems with BEACON, but did not designate staff to be on-site technical assistants at the TAOs.

III. Evaluation and Recommendations

The Bureau conducted this initial evaluation of the implementation of the Pathways model based on field visits, interviews with Central Office managers and field staff, reviews of policies and procedures, and observations of training sessions. Immediately after Pathways implementation, the Bureau found that the Department had started to change the culture around the TAFDC program as field staff appeared refocused on engaging with recipients about the Work Requirement. In this regard, the Department has made improvements since the Bureau’s July 2014 Review. However, the Department needs to address issues with the Pathways model in order to complete implementation and support its new processes. In particular, system issues with BEACON have been challenging and distracting to staff as they adjust to a new approach to intake. Pathways is a work-in-progress, and it is too early to determine whether the Pathways model includes effective and efficient processes, and whether it will lead to better self-sufficiency planning and better outcomes for TAFDC recipients.

A summary of the Bureau's evaluation and recommendations is set forth below:

1. Change management requires short and long-term strategic planning around preparing and supporting staff.

The Department successfully communicated to staff the need for a change in the culture of the TAFDC program and the purpose of the Pathways model. However, field staff were not well-prepared for the operational and system changes that came with implementation of the model. The Department relied upon webinars to build staff skills and to demonstrate the new processes in BEACON, but the webinars did not meet the training needs of field staff. In lieu of webinars, field staff expressed a preference for more hands-on classroom training and other training methods that allow for more traditional question-and-answer sessions. In addition, the webinars were directed at all field staff, and there was no specialized training for supervisors. This approach left supervisors unprepared to trouble-shoot and to serve as leaders under the Pathways model.

Recommendation:

The Department should create and execute short-term and long-term plans to build the knowledge base, skills, and tools of TAFDC field staff and to further support the Pathways model. The Department should collaborate with TAFDC field staff to develop a follow-up training curriculum on the Pathways model and designate members of field staff to assist with delivering the training at TAOs. Moving forward, the Department should engage field staff as partners to assess training needs, identify training methods, and plan curricula.

2. Thorough and meaningful assessment interviews require a combination of strategies and skills that focus on the individual.

In the July 2014 Review, the Bureau raised concerns that case managers were not focused on assessment and self-sufficiency planning for TAFDC recipients. During the Department's new assessment interview, case managers ask standardized questions to engage recipients and understand their challenges and capabilities. Case managers reported generally positive feedback on the standardized questions. However, they did not have sufficient guidance on how to evaluate the results of assessment, move forward with individualized self-sufficiency planning, and track recipients' progress over time. Case managers indicated a need for more information about their local CIES programs, which are funded by the Department, as well as other community resources, in order to match recipients with appropriate programs, services and potential employment.

Recommendation:

The Department should develop guidance and coaching for field staff on how to use recipient information gained from the PSS Assessment for targeted and appropriate referrals to employment-related programs and services. The Department should illustrate how case managers can take an individualized approach to each recipient, setting specific goals that can be achieved within the time limits for TAFDC benefits.

3. Effective data collection and meaningful metrics inform program management and development.

Before Pathways implementation, self-sufficiency planning was documented on handwritten documents, many of which were incomplete. There were significant gaps and inconsistencies in BEACON data related to the Work Requirement. By eliminating “paper” processes and building more structure for data entry in BEACON, the Department created potential for closing gaps and reducing inconsistencies in BEACON case records. The Department also created an opportunity to generate data reports and develop metrics for the Pathways model. However, the Bureau identified a critical and time-sensitive need for the Department to evaluate and validate the integrity of the Pathways data, and to develop and monitor metrics.

Recommendation:

The Department should complete its development of relevant, purposeful, and reliable metrics for the Work Requirement based on accurate and reliable data as expeditiously as possible. Once developed, the Department should monitor these metrics on a consistent basis to inform program development. In addition, the Department should commit to additional quantitative and qualitative analyses aimed at the continuous improvement of the TAFDC program and field staff.

4. When staff contribute to new procedures, there is an opportunity to build understanding, acceptance, and consistency.

Another concern that field staff raised during interviews with the Bureau was that they did not have a firm understanding of the new procedures for the PBJs and the PSS Assessment. The Department designated a small group of staff to provide general input on the Pathways model and another small group of staff for pilot testing of the PSS Assessment interview. However, it did not engage a broad group of field staff in a coordinated way to outline and draft new procedures for the Pathways model. As a result, the Department lost an opportunity to build field staff “buy-in” and leverage their subject matter expertise and practical experience. During implementation, field staff identified gaps and practical problems right away as they tried to follow the procedures. For example, field staff were unsure whether recipients were required to make three new contacts during the second 30-day period of the PBJs and if so, how to define “new” in this context. In addition, for many recipients, field staff found that the inflexible parameters around the timing of the initial PSS Assessment and reassessments seemed too burdensome for some recipients.

Recommendation:

The Department should engage directly with field staff while planning new initiatives and outlining policies, procedures, and operations plans. The Department should leverage the expertise and practical experience of field staff to evaluate and mitigate risks. The Department should conduct structured pilot testing before implementing changes to its operations and systems.

5. Creating effective new system processes requires broad and sustained input from all users, as well as integrated IT support.

The Department integrated the Pathways model into BEACON, creating standardized interviews for PBJs Screening and PSS Assessment and automated processes to support them. The Department's dependency on BEACON created vulnerability as staff adjusted to new screens and data fields and encountered glitches. Pre-implementation testing was limited to a small group, and there was no opportunity for the rest of the field staff to experiment hands-on with new fields, screens, and processes. During implementation, there were no users with advanced training at the TAOs to provide on-site technical assistance to case managers when they encountered problems or navigated through unfamiliar steps in BEACON. The new automation features in BEACON, such as automated scheduling for PSS appointments, created unintended consequences, including multiple overlapping appointments for TAFDC recipients. Field staff investigated and applied ad hoc solutions to problems with data entry and inadvertently undermined the integrity of the data in BEACON.

Recommendation:

The Department should evaluate and adjust the automated processes that support the Pathways model, including the auto-scheduling of PSS Appointments, as expeditiously as possible. The Department should ensure that these automated processes are efficient, effective, and align with field operations. Moving forward, the Department should expand user input and testing before implementing changes to BEACON in order to ensure that systems and operations processes are well-aligned from the outset.

IV. Self-Sufficiency Specialists

A. Background

The Welfare Reform Statute required the Department to develop a specialist role to “focus on providing targeted employment and training assistance to recipients that the [D]epartment determines have a high risk of long-term dependence on state benefits and require specialized assistance to achieve economic independence.”⁷⁶ According to the statute, the caseload of the specialist must be limited to 60 TAFDC cases per specialist.⁷⁷ The statute allows the Department to define “high risk of long-term dependence,” but it requires teen parents to be included in the definition.⁷⁸ The statute also requires the Department to track and report on outcomes achieved by these specialists.⁷⁹

⁷⁶ M.G.L. c. 18, § 5.

⁷⁷ Id.

⁷⁸ Id.

⁷⁹ Id.

B. The Department's Implementation

The Department chose the title “Self-Sufficiency Specialist” for the specialist identified in the Welfare Reform Statute and implemented the role in December 2015, prior to completing its plans for the Pathways model.

According to the Department's Online Guide, the caseload for Self-Sufficiency Specialists includes young parents under the age of 24, as well as any other “high-risk” recipient who is:

- a resident of emergency shelter;
- a victim of domestic violence;
- a non-English speaker;
- without a high school diploma, HiSET, or other equivalency certificate;
- unemployed for at least the past year;
- having substance abuse issues;
- having mental health issues;
- having cognitive limitations;
- having a criminal background; or
- having other issues as determined by Department staff.⁸⁰

The Department's procedures charge case managers with the responsibility for identifying potential cases for Self-Sufficiency Specialists.⁸¹ The Department added “pop up” messages on BEACON to prompt case managers to consider flagging cases as potential referrals for Self-Sufficiency Specialists when recipients fit any of the criteria in the list above.⁸² The Department also programmed BEACON to create a list of these potential referrals for a designee in each TAO – the Director, an Assistant Director, or a supervisor – to review and select appropriate “high-risk” cases to be added to the Self-Sufficiency Specialist caseload.⁸³

The Department conducted training for 47 Self-Sufficiency Specialists, which included current employees and new-hires, and deployed them to TAOs. Each TAO had one to four Self-Sufficiency Specialists, depending on its size. The Department created a performance evaluation template with standard duties for Self-Sufficiency Specialists and provided separate training

⁸⁰ See Dep't of Transitional Assistance, Online Guide: Work Program Requirements Overview, http://webapps.ehs.state.ma.us/DTA/PolicyOnline/!SSL!/WebHelp/TAFDC/Program_Nonfinancial_Requirements/Work_Program_Requirements/Work_Program_Requirements_Overview.htm (last updated Mar. 25, 2016).

⁸¹ Id.

⁸² Id.

⁸³ Dep't of Transitional Assistance, Online Guide: AU Reassignment Recommendation, http://webapps.ehs.state.ma.us/DTA/PolicyOnline/!SSL!/WebHelp/TAFDC/Services/Self-Sufficiency_Specialist/AU_Reassignment_Recommendation.htm (last updated Dec. 21, 2015).

sessions for the TAFDC supervisors to whom Self-Sufficiency Specialists were assigned. Self-Sufficiency Specialists received case referrals and built their caseloads, but generally did not reach the expected caseload distribution of 60 cases per specialist.

During April and May 2016, the Department engaged in an internal review of the role of the Self-Sufficiency Specialist. The Department's review included group meetings and individual interviews with Self-Sufficiency Specialists, as well as interviews with field managers. In September 2016, the Department reduced the number of Self-Sufficiency Specialists from 47 to 27 and redeployed the 20 former Self-Sufficiency Specialists as case managers with full TAFDC caseloads. The Department provided a more detailed explanation of its internal review of the Self-Sufficiency Specialists in the "Department of Transitional Assistance (DTA) Update on Departmental Efforts to Further Implement the TAFDC Work Requirement," which the Bureau included at the end of this report.

V. Evaluation and Recommendations

The Bureau evaluated the Department's implementation of the role of the Self-Sufficiency Specialist as it occurred and monitored the integration of the role into TAOs. The Department encountered problems with integration, and some of the problems were related to timing. The Department introduced Self-Sufficiency Specialists before completely outlining the new Pathways model. The Bureau found that the Department had not conducted sufficient planning and analysis specific to the role prior to implementing it. However, the Bureau observed that the Department's internal review after implementation represented a promising practice.

The Bureau identified the following concerns with the planning and implementation of Self-Sufficiency Specialists:

1. Integration of a new role into field operations requires planning and development with all staff.

The Department did not engage case managers and supervisors in the planning process for the role of the Self-Sufficiency Specialist. When the Department subsequently implemented the role, the communication with field staff was not effective. There was no training for TAFDC case managers to orient them to the new role of the Self-Sufficiency Specialist or to help them identify "high-risk" TAFDC recipients. As a result, there was a lack of understanding of the role of the Self-Sufficiency Specialist among field staff at all levels. Field staff needed clarity on the purpose of Self-Sufficiency Specialists – and how their role was different from that of other specialists – in order to understand how to coordinate efforts around serving high-risk TAFDC recipients.

Recommendation:

The Department should engage TAFDC case managers, supervisors, and specialists in defining their roles and coordinating efforts around serving TAFDC recipients. The Department should communicate role definitions to all staff and conduct cross-training to ensure that there is a universal and consistent understanding of roles.

2. Key definitions for program development must be resolved before implementation.

Defining the characteristics of recipients whom the Welfare Reform Statute described as having “high risk of long-term dependence” presented a challenge to the Department. Moreover, the Department did not fully examine its options and settle on a definition for “high-risk” recipients before implementing the role of Self-Sufficiency Specialists. The Bureau found that the Department did not provide the designees who selected and approved cases for Self-Sufficiency Specialists with clear and sufficient guidance on how to select appropriate cases. There was widespread confusion, and as a result, the Self-Sufficiency Specialists did not build a full caseload or a strong referral base.

Recommendation:

The Department should define “high risk of continued dependence” through an evidence-based analysis of TAFDC recipients and their characteristics. The Department should then outline the roles of case managers and specialists for delivering services to high-risk recipients.

VI. Next Steps

The Bureau and the Department discussed its evaluation of the implementation of the Pathways model and the Self-Sufficiency Specialist role, along with the Bureau’s recommendations, at meetings from August through October 2016. The Department then provided the Bureau with the “Department of Transitional Assistance (DTA) Update on Departmental Efforts to Further Implement the TAFDC Work Requirement” and a letter from the Department’s Commissioner. The Bureau included the letter and the update in this report in a separate section following the Conclusion.

As part of its ongoing mandate to conduct oversight at the Department, the Bureau will track its recommendations and determine the extent to which the Department addresses the Bureau’s concerns.

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Part Two

I. Scope and Approach

Part Two of this report examines the larger contextual issues related to the Work Requirement and workforce development resources for TAFDC recipients. It includes a discussion of the Temporary Assistance for Needy Families (TANF) block grant and its role in funding workforce development resources. In addition, there is a discussion of the Workforce Investment and Opportunity Act (WIOA) and its potential for integrating workforce development resources. The focus of this section is the strategic use of resources to help low-income families become self-sufficient.

In order to better understand the TAFDC program, the Bureau conducted research on administrative data related to the TANF program, including administrative data from the Administration of Children and Families (ACF), the federal agency that administers TANF, as well as the Executive Office of Health and Human Services (EOHHS). The Bureau met with the Department's Central Office managers and EOHHS budget staff to discuss this data. The Bureau also interviewed representatives of the TANF programs in New Hampshire and Connecticut and met with a representative of the regional office of ACF in Boston.

In addition to this research on TANF funding, the Bureau evaluated the initial implementation of WIOA in Massachusetts. WIOA mandates high-level and grass-roots collaboration between the Department and the Executive Office of Labor and Workforce Development (EOLWD), in addition to a number of other public and private partners. The Bureau has reviewed WIOA initiatives with the Department as well as with EOLWD.

II. The Temporary Assistance for Needy Families Block Grant

A. Background

The TANF block grant is a source of funding for state expenditures that are reasonably calculated to support one or more of the following four statutory purposes:

- Provide assistance to needy families so that children may be cared for in their own homes;
- End the dependence of needy parents by promoting job preparation, work, and marriage;
- Prevent and reduce the incidence of out-of-wedlock pregnancies; and
- Encourage the formation and maintenance of two-parent families.⁸⁴

⁸⁴ See Office of Family Assistance, Admin. for Children & Families, About TANF, available at: <http://www.acf.hhs.gov/ofa/programs/tanf/about> (last visited Nov. 2, 2016); see also Gene Falk, Cong. Research Serv., The Temporary Assistance for Needy Families (TANF) Block Grant: Responses to Frequently Asked

Federal law also allows up to 30% of the block grant to be used to contribute to other block grants related to child care or social services.⁸⁵

The TANF block grant functions as a supplement to state-supported programs and services. Before claiming funds from the TANF block grant, states must allocate and spend their own funds for services and programs that fall under one or more of the four TANF purposes. These state funds are called Maintenance of Effort (MOE) expenditures. States then claim funds from the TANF block grant as reimbursement for TANF-related programs and services. Thus, together, the MOE expenditures and the claimed funds from the TANF block grant support a variety of state and local programs and services.

The TANF block grant provides \$16.5 billion annually across the 50 states and the District of Columbia. Its funding level has not changed since 1996, when welfare reform at the federal level occurred. In 2015, the total of nationwide TANF block grant and MOE expenditures was \$31,688,988,321.⁸⁶

The Work Participation Rate (WPR) serves as the primary federal metric for the TANF program. It is a formula focused on the overall participation of benefits recipients in the TANF Work Requirement. Each state is required to demonstrate that a minimum of 50% of its recipients are meeting their participation standards for the Work Requirement; however, there are some exclusions and credits under federal rules that affect the calculation of this rate.⁸⁷ If a state falls below the minimum WPR requirement, a potential penalty is a reduction of the TANF block grant.⁸⁸

Other than the WPR, which focuses exclusively on benefits recipients, the federal government did not establish metrics for participation or outcomes from TANF-funded programs or services. As a result, states are not required to analyze the impact of TANF-funded programs or services on low-income families or to demonstrate the extent to which they achieve one or more of the TANF purposes, but they may create their own metrics to inform strategic planning.⁸⁹

B. Analysis

For this analysis, the Bureau focused on TANF and MOE expenditures and how they relate to helping the Department achieve its mission of assisting low-income families to achieve long-term economic self-sufficiency. The Bureau analyzed data from fiscal years (FY) 2013

Questions (March 18, 2016), available at: <https://www.fas.org/sgp/crs/misc/RL32760.pdf>. [hereinafter Falk, TANF FAQ Responses].

⁸⁵ See Falk, TANF FAQ Responses at 5.

⁸⁶ *Id.* at 1; see Appendix A.

⁸⁷ See *id.* at 11. For two-parent families, the rate is 90% participation. Excess MOE reduces provides credit towards this rate. *Id.*

⁸⁸ *Id.* at 12.

⁸⁹ *Id.* at 7.

through 2015 on the utilization of the TANF block grant and MOE expenditures in Massachusetts and compared it to national data. The Bureau also conducted research on the approaches that other states take to administer the TANF block grant.

The Massachusetts TANF block grant is \$459 million.⁹⁰ In FY 2015, the total of TANF and MOE expenditures in Massachusetts was \$1,112,168,004.⁹¹ The Department has not consistently reached the 50% participation requirement; however, through credits and other calculation rules, the Department has met its minimum participation requirement and has not triggered a penalty that could reduce the TANF block grant.⁹²

The chart below provides a comparison between Massachusetts expenditures and national expenditures in FY 2015.⁹³ The Bureau found that Massachusetts expenditures for cash assistance administered by the Department, which are identified in the chart collectively as “Basic Assistance,” accounted for 23.9% (\$266.2 million) of the TANF and MOE spending and were consistent with national trends.⁹⁴ At 21.6% (\$240.0 million), the TANF and MOE expenditures on child care were significantly higher than the nationwide level of spending on child care (12.7% or \$4.0 billion).⁹⁵ Together, cash assistance and child care expenditures represented approximately half of TANF and MOE spending.

The category of TANF data that ACF labels “Work, Education, & Training” includes programs and services related to the Work Requirement, such as the Department’s Competitive Integrated Employment Services (CIES) programs. In FY 2015, Massachusetts TANF and MOE spending in this category was 0.9 % (\$9.7 million), which was significantly lower than the nationwide level of 6.7% (\$2.1 billion).⁹⁶ In FY 2013 and FY 2014, spending in this category

⁹⁰ Falk, TANF Introduction at 14.

⁹¹ See Office of Family Assistance, Admin. for Children & Families, TANF and MOE Spending and Transfers by Activity, FY 2015: Massachusetts (last updated Aug. 3, 2016), available at: https://www.acf.hhs.gov/sites/default/files/ofa/fy2015_tanf_moe_massachusetts_pie_charts.pdf. (See Appendix A to compare TANF and MOE Spending and Transfers by Activity, FY 2015: Massachusetts and TANF and MOE Spending and Transfers by Activity, FY 2015: United States).

⁹² See Falk, TANF FAQ Responses at 14 (see Table 4 entitled: States Failing TANF All-Families Work Participation Standard). In 2011, Massachusetts ranked 53rd among 54 states and U.S. territories with a WPR of 7.3%. Since then, the WPR has increased to 57.8% in 2014. See also Office of Family Assistance, Admin. for Children & Families, Temporary Assistance for Needy Families Combined TANF and SSP-MOE Work Participation Rate Fiscal Year 2011, available at: <http://www.acf.hhs.gov/sites/default/files/ofa/wpr2011tab01b.pdf>.; Office of Family Assistance, Admin. for Children & Families, Temporary Assistance for Needy Families Combined TANF and SSP-MOE Work Participation Rate Fiscal Year 2014, available at: http://www.acf.hhs.gov/sites/default/files/ofa/wpr2014_table01b.pdf.

⁹³ See Appendix A; see also Office of Family Assistance, Admin. for Children & Families, FY 2015 Federal TANF & State MOE Financial Data, available at: http://www.acf.hhs.gov/sites/default/files/ofa/tanf_financial_data_fy_2015.pdf. (See Appendix B, TANF and MOE Expenditures Summary by ACF-196 Spending Category, FY 2015: Massachusetts and Federal).

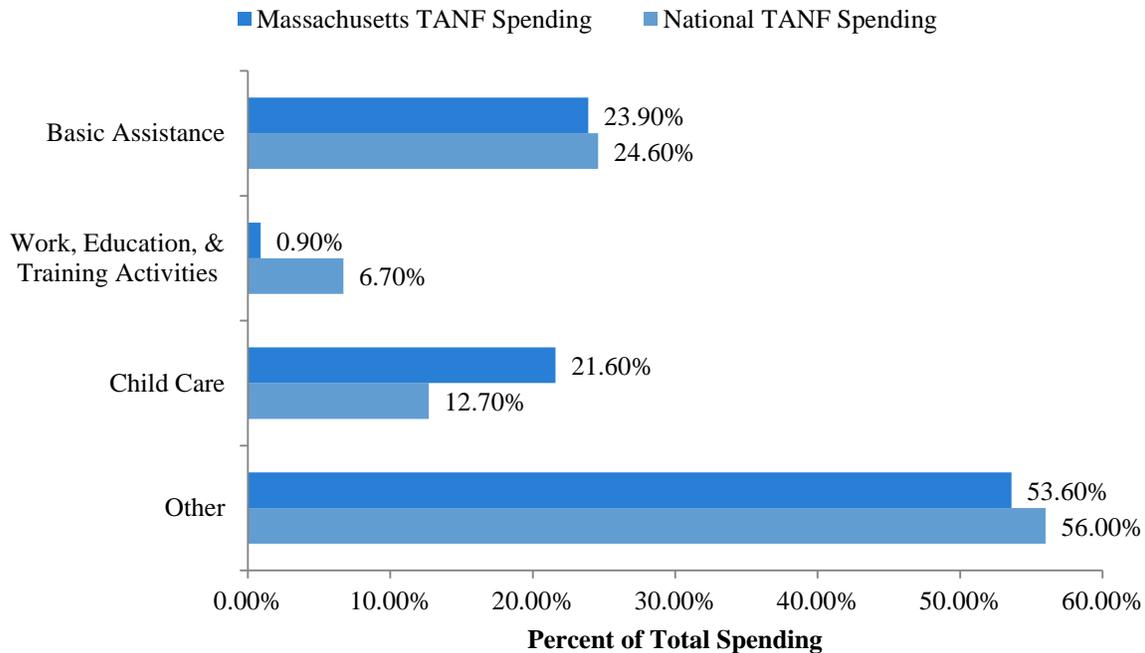
⁹⁴ See Appendix B.

⁹⁵ See Appendix A; see also Appendix B.

⁹⁶ Id.

was even lower at approximately 0.6% (\$6.5 million in FY 2013 and \$6.3 million in FY 2014).⁹⁷ Again, these Massachusetts spending rates were significantly lower than the nationwide rates of 6.4% (\$2.0 billion) and 6.8% (\$2.2 billion), respectively. Based on FY 2014 data, Massachusetts ranked lowest among all states in the percentage of TANF block grant and MOE expenditures spent on programs and activities related to employment.⁹⁸

FY 2015 TANF and MOE Expenditures by Category



Prepared by: The Office of the Inspector General

Source: Federal TANF and State MOE Summary by ACF-196 Spending Category FY 2015⁹⁹

⁹⁷ See Office of Family Assistance, Admin. for Children & Families, FY 2014 Federal TANF & State MOE Financial Data, available at: http://www.acf.hhs.gov/sites/default/files/ofa/tanf_financial_data_fy_2014.pdf. (See Appendix C, TANF and MOE Expenditures Summary by ACF-196 Spending Category, FY 2014: Massachusetts and Federal); see also Office of Family Assistance, Admin. for Children & Families, TANF Financial Data – FY2013, available at: http://www.acf.hhs.gov/sites/default/files/ofa/fy_2013_expenditures.pdf. (See Appendix D, TANF and MOE Expenditures Summary by ACF-196 Spending Category, FY 2013).

⁹⁸ See Liz Schott et al., Center on Budget & Policy Priorities, How States Use Federal and State Funds Under the TANF Block Grant (Oct. 15, 2015), p. 8, available at: http://www.cbpp.org/sites/default/files/atoms/files/4-8-15tanf_0.pdf (See Figure 3 entitled: 10 States Spent Less Than 5 Percent of Federal and State TANF Funds on Work-Related Activities in 2014). Prior to 2015, the category of Work, Education & Training was formerly called “Work-Related Activities.” See Appendix B.

⁹⁹ See Appendix B. The “Other” category is an aggregate of several ACF reporting categories. For more information on the “Other” categories see Appendix B.

Because of the flexibility built into the administration of the TANF block grant, Massachusetts and other states expend approximately half of their TANF funds across a variety of categories. To simplify the presentation of data in the chart above, the Bureau combined these expenditures and represented that sum in the “Other” category. This “Other” category includes spending for administration and systems, out-of-wedlock pregnancy prevention programs, non-recurrent short-term benefits, transfers to the social services block grant, refundable tax-credits, and a category that ACF labels as “Other (remaining)” in the TANF administrative data.¹⁰⁰

The Bureau conducted research into the expenditures under the “Other (remaining)” category.¹⁰¹ In FY 2015, Massachusetts spent \$166 million in the “Other (remaining)” category.¹⁰² Parallel spending in the same category was \$177 million in FY 2013 and \$179 million in FY 2014.¹⁰³ The Bureau found that these expenditures were for higher education scholarships.¹⁰⁴ The Bureau conducted further analysis to determine the connection between these scholarships and TANF purposes.

The most recent Massachusetts TANF State Plan (TANF State Plan) includes two scholarship programs. One is a needs-based scholarship program specifically for students enrolled at the University of Massachusetts. The other is a Scholarship Reserve program that provides financial assistance to Massachusetts students pursuing a program of higher education at a public college, independent college, school of nursing, or another approved institution. For this Scholarship Reserve program, there is no indication in the TANF State Plan that the students must demonstrate financial need. The TANF State Plan does not provide an explanation as to how the scholarship programs meet one of the four TANF purposes.¹⁰⁵ While reviewing the TANF State Plan, the Bureau developed a broader concern that it does not lay out an overall strategy for the utilization of the TANF block grant or explain how each program or service funded under the grant is intended to build self-sufficiency for low-income families, including TAFDC recipients.

In order to find more detailed information on the scholarship programs, the Bureau reviewed financial reports on TANF and MOE expenditures that Massachusetts filed with ACF.¹⁰⁶ In an FY 2015 report, the Bureau identified the TANF purposes for the higher education

¹⁰⁰ A full accounting of TANF expenditures and other data reports are available at: <http://www.acf.hhs.gov/ofa/programs/tanf/data-reports>.

¹⁰¹ The “Other (remaining)” category is a new ACF reporting category for FY 2015 and was formerly called “Other Non-Assistance.”

¹⁰² See Appendix B.

¹⁰³ See Appendix C.

¹⁰⁴ See Office of Family Assistance, Admin. for Children & Families, Massachusetts TANF ACF-196R Financial Report, Part II: Narrative Section (See Appendix E).

¹⁰⁵ See Dep’t of Transitional Assistance, Massachusetts State Plan for Temporary Assistance for Needy Families (TANF) (July 2016), p. 12, available at: <http://www.mass.gov/eohhs/docs/dta/public-notice/draft-tanf-state-plan-wioa-plan-102816.pdf> [hereinafter TANF State Plan]. The Bureau reviewed the most recent version of the TANF State Plan, which is posted on the Department’s website in draft form for public comments until December 12, 2016. All citations to the TANF State Plan are to this version.

¹⁰⁶ See Appendix E.

scholarship programs. The report indicates that the scholarship programs are not focused on the TANF goal to build self-sufficiency for low-income families; instead, they “serve a dual purpose” under two other TANF goals to prevent out-of-wedlock pregnancies and to encourage the formation of two-parent families.¹⁰⁷ The report states, “[s]cholarships not only benefit the individuals in receipt of scholarships, but they also benefit the future generations who aspire to pursue higher education.”¹⁰⁸ The Bureau found that ACF has accepted these TANF and MOE expenditures on higher education scholarships as compliant with TANF purposes. Nevertheless, the Bureau’s review of the financial reports reinforced the Bureau’s broader concern about the lack of planning around TANF block grant expenditures in Massachusetts. If there is a state-wide, comprehensive strategy for the utilization of the TANF block grant, it is not apparent, and it cannot be identified in the TANF State Plan or the financial reports on TANF and MOE expenditures.

As a final step, the Bureau inquired of the Department whether there was any connection between the scholarship programs and self-sufficiency planning for TAFDC recipients, such as a referral process or an application distributed by the Department. The Department reported that there was no such connection, and that it did not have data on whether current or former recipients had received scholarships.

As a result of reviewing the data and documentation related to TANF and MOE expenditures, the Bureau was concerned about the parameters of the Department’s role with regard to the administration of the TANF block grant. The TANF State Plan indicates that the Department is the “primary agency responsible for administering and supervising” the TANF block grant.¹⁰⁹ The Bureau found that while the Department administers TAFDC as the TANF benefits program, it does not have the authority or capacity to oversee the utilization of TANF funds by other secretariats and agencies. There is no reference in the TANF State Plan to any other governing body or working group that leads strategic planning or analysis of the utilization of the TANF block grant among the Massachusetts secretariats and agencies administering TANF programs and services.

In other states, there is a more holistic approach to administering the TANF block grant. In Washington, for example, there is a legislative-executive task force called the WorkFirst Subcabinet that oversees the administration of the TANF program. The Subcabinet includes representatives from the legislature as well as executive branch representatives from human services, social services, early learning, employment and workforce development, higher education, and administration and finance. It meets quarterly and reviews outcome and performance metrics to evaluate both the state’s cash assistance program and other TANF-related programs and services. It makes recommendations about strategies, policies, and initiatives to promote self-sufficiency.¹¹⁰

¹⁰⁷ Id.

¹⁰⁸ Id.

¹⁰⁹ See TANF State Plan at 3.

¹¹⁰ Wash. Rev. Code Ann. § 74.08A.260(8)(b)-(d).

In New Hampshire, the Department of Health and Human Services (DHHS) administers the state's TANF program. By statute, the DHHS Commissioner and workforce development leaders work cooperatively and share TANF and workforce development funding to the extent possible.¹¹¹ In support of this collaboration, there is a health and human services oversight committee that consists of eight members of the legislature.¹¹² The purpose of the committee is "to support a cost effective, comprehensive, coordinated system of health and human services that is family-centered and community-based."¹¹³

In Texas, the Health and Human Services Commission and the Workforce Commission, along with local workforce development boards, are jointly responsible for developing and implementing a state program of temporary assistance and related support services.¹¹⁴ In an effort "to streamline the delivery of services provided in local career development centers," these commissions and local workforce boards integrate the administrative and case management functions associated with the TANF program, child care programs, employment and training programs, and the SNAP program.¹¹⁵

Based on this evaluation, the Bureau found that there is a lack of planning, coordination and monitoring of TANF block grant and MOE expenditures in Massachusetts. Without proper planning, coordination, and outcome-tracking, TANF and MOE funds could be allocated to programs and services that are inefficient or ineffective in promoting self-sufficiency. This risk crosses a number of Massachusetts secretariats and agencies; it cannot be attributed to the Department alone because the Department does not have control or oversight over the full TANF block grant. Moving forward, as the Bureau recommends below, Massachusetts agencies and secretariats should commit to creating and executing a joint strategic plan for utilizing TANF and MOE funds that maximizes opportunities for low-income families.

III. Workforce Investment Opportunity Act

A. Background

In July 2014, President Obama signed the Workforce Innovation and Opportunity Act (WIOA), and most of its provisions came into effect in 2015. WIOA is federal legislation that funds and regulates workforce development. WIOA replaced the Workforce Investment Act (WIA) of 1998 and built on the standards for service coordination and partnerships that WIA established. Through WIOA, there are appropriations for workforce development programs and services, including career counseling, job search programs, job training programs, education

¹¹¹ N.H. Rev. Stat. Ann. § 167.77-f(I)(e).

¹¹² N.H. Rev. Stat. Ann. § 126-A:13(I). The oversight committee consists of three senate members, at least one of whom is a member of the senate finance committee, and five members of the house of representatives, four of whom shall be from the health, human services and elderly affairs committee, and one of whom shall be from the house finance committee. N.H. Rev. Stat. Ann. § 126-A:13(I).

¹¹³ N.H. Rev. Stat. Ann. § 126-A:13(I).

¹¹⁴ Tex. Hum. Res. Code Ann. § 34.002.

¹¹⁵ Tex. Lab. Code Ann. § 302.065(a).

programs, and skills-development programs that are offered without charge to the public. In order to receive WIOA funds, states must create a new infrastructure for workforce development, build public and private partnerships, and align federally-funded workforce development programs and services with other related services at the state and local levels.¹¹⁶

The provisions of WIOA are expansive, but its general goals are:

- Increase the focus on serving the most vulnerable workers, including low-income adults and youth who have limited skills, lack work experience, and face other barriers to economic success;
- Expand education and training options to help individuals access good jobs and advance in their careers;
- Help disadvantaged and unemployed adults and youth earn while they learn through support services and effective employment-based activities; and
- Align planning and accountability policies across core programs to support more unified approaches to serving low-income, low-skilled individuals.¹¹⁷

A focal point of WIOA is a mandate for partnerships among public agencies and private entities at the state and local levels to achieve these goals. WIOA sets specific reporting requirements and deadlines that states must meet in order to continue to receive funding. One requirement is to create a WIOA State Plan, a strategic plan illustrating how the state will achieve the goals of WIOA by integrating programs and services. Another requirement is that states monitor and report standard performance metrics that reflect the goals of WIOA.¹¹⁸ Finally, states must set up regional workforce development boards to streamline and maximize services for jobseekers within their communities.¹¹⁹

WIOA state agency partners include labor and workforce development agencies and education programs, veterans' services, housing programs, and health and human services agencies and programs.¹²⁰ Human services agencies administering TANF benefits programs are "required one-stop partners" under WIOA.¹²¹ WIOA requires that TANF agencies offer services and contribute support to the infrastructure at One-Stop Career Centers, which are community-

¹¹⁶ See David H. Bradley, Cong. Research Serv., *The Workforce Innovation and Opportunity Act and the One-Stop Delivery System* (Oct. 27, 2015), p. 1-3, available at: <https://www.fas.org/sgp/crs/misc/R44252.pdf>; see also Helly Lee, CLASP, *WIOA: What Human Services Agencies and Advocates Need to Know* (Feb 2015), p. 2, available at: <http://www.clasp.org/resources-and-publications/publication-1/WIOA-and-Human-Services-FINAL.pdf>.

¹¹⁷ See Kisha Bird et al., CLASP, *New Opportunities to Improve Economic and Career Success for Low-Income Youth and Adults: Key Provisions of the Workforce Innovation and Opportunity Act (WIOA)* (Sept. 2014), available at: <http://www.clasp.org/resources-and-publications/publication-1/KeyProvisionsofWIOA-Final.pdf>.

¹¹⁸ See Bradley at 13-14.

¹¹⁹ *Id.* at 11-12.

¹²⁰ *Id.* at 6-7. While TANF agencies are required One-Stop partners, WIOA includes an opt-out for governors. Most states invoked this opt-out. For a list of required Massachusetts One-Stop partners, see Appendix F.

¹²¹ *Id.* at 6-7.

based offices under labor and workforce development agencies that provide assistance to job seekers and businesses.¹²²

Under WIOA, One-Stop Career Centers are intended to be a universal source of programs and services, and there are no screening criteria for services.¹²³ WIOA outlines how One-Stop Career Centers should administer programs and services based on “priority of service.”¹²⁴ WIOA specifically identified recipients of public assistance and low-income families, including TANF benefits recipients, as a priority for funding and services. Therefore, One-Stop Career Centers must include training programs and other resources that meet the needs of TANF benefits recipients who might face certain barriers to employment, such as limited job experience or education, limited English speaking and writing skills, or child care needs.¹²⁵

WIOA requires data reporting on employment outcomes from programs and services for low-income families and the barriers to employment that they face.¹²⁶ This data monitoring is a means of determining whether programs and services are tailored to the appropriate needs, and whether they support progress towards self-sufficiency.¹²⁷

B. Analysis

Massachusetts opted to pursue WIOA funds for workforce development and submitted a WIOA State Plan to the federal Department of Labor on March 30, 2016.¹²⁸ The plan is effective from July 1, 2016 through June 30, 2020.¹²⁹ According to EOLWD, the WIOA State Plan is a:

four-year strategic plan that brings together in a collaborative effort federally funded programs that provide employment and training services for adults, dislocated workers, youth and veterans, adult education and literacy programs, vocational rehabilitation programs that assist individuals with disabilities in

¹²² See Bradley at 6-7, 10. More information about Massachusetts One-Stop Career Centers is available at: <http://www.mass.gov/lwd/employment-services/career-services/career-center-services/>. The services at One-Stop Career Centers services include: determination of eligibility to receive assistance under WIOA; outreach and intake including career center orientations; initial assessment of skills, aptitudes, interests, and abilities; career counseling, job search and placement assistance; providing information relating to local, regional, and national labor market areas; providing performance data; providing information relating to the availability of supportive services, such as child care and transportation. See Workforce Innovation and Opportunity Act (WIOA) Massachusetts Combined State Plan (July 1, 2016), p. 26-27, available at: <http://www.mass.gov/massworkforce/state-plan/wioa-2020/mawioa-state-plan-final-4-7-16.pdf> [hereinafter WIOA State Plan].

¹²³ See Bradley at 5, 19.

¹²⁴ Id. at 5.

¹²⁵ Id. at 5-7.

¹²⁶ Id. at 5, 21; see also Lee at 2.

¹²⁷ See Lee at 5.

¹²⁸ See Massachusetts Workforce Development System, Massachusetts Combined State Plan for FY2017-FY2020, available at: <http://www.mass.gov/massworkforce/state-plan/>.

¹²⁹ Id.

obtaining employment, and employment programs for those on public assistance and or with barriers to employment.¹³⁰

EOLWD further states that the WIOA State Plan “represents the combined efforts of several state and local partners to provide an effective and efficient workforce system for the Commonwealth.”¹³¹ There are critical milestones for implementing the WIOA State Plan during the next two years. Through its analysis, the Bureau found that much of the collaborative work under WIOA is at an early stage, and it presents opportunities for the Department to improve its programs and services under the Work Requirement and connect TAFDC recipients to a much wider network of work force development programs and services.

The WIOA State Plan focuses on building partner networks and aligning economic, workforce, and education systems based on business needs.¹³² It asserts that the Department, along with other WIOA partners, “will work together to leverage relationships with the business community and to develop a coordinated approach to outreach and service delivery.”¹³³ The WIOA State Plan further states that WIOA partners “regularly discuss the need to increase the available resources for education and training programs – focused on career pathways – that can help move the skill set of individuals receiving assistance into the range of employment that provides self-supporting wages.”¹³⁴

The WIOA State Plan also lays out specific goals for the Department. It states that the Department will work with the other WIOA core partners to “develop a more seamless customer flow/referral model so that...individuals with the highest barriers to employment are well served not just by [the Department], but by all of the appropriate parts of the workforce development system.”¹³⁵ Thus, for the Department, WIOA represents an opportunity to connect TAFDC and other benefits recipients with a network of workforce development programs and services. As a partner, the Department is required to provide job seekers with access to its programs and services at One-Stop Career Centers across Massachusetts. The primary objective is to ensure that the Department and EOLWD will serve individuals and families seeking economic stability as “shared customers.”¹³⁶ This requires integrated planning, coordination, and information-sharing between Transitional Assistance Offices (TAO) and One-Stop Career Centers across the state on a regular basis.¹³⁷

¹³⁰ Id.

¹³¹ Id.

¹³² See WIOA State Plan; see also Massachusetts Workforce Development System, WIOA Steering Committee Meetings, available at: <http://www.mass.gov/massworkforce/wioasubcommittees/wioa-steering-committee/> (last visited Nov. 7, 2016) (see WIOA Steering Committee meeting agendas and resources).

¹³³ See WIOA State Plan at 73; see also Appendix F.

¹³⁴ See WIOA State Plan at 274-75.

¹³⁵ Id. at 274.

¹³⁶ Id. at 347.

¹³⁷ Id. at 275.

Along with other WIOA partners, the Department signed a Memorandum of Understanding (MOU) to:

- focus on demand-driven services;
- prioritize the needs of businesses and individuals with barriers;
- streamline regional planning and create partnerships across programs;
- establish and track performance metrics across all partners; and
- build self-sufficiency through career pathways.¹³⁸

All of these actions require dedicated resources from the Department and the other partner agencies. For example, to establish and track performance metrics, they must share data and identify joint metrics to measure progress and outcomes. The process of sharing data involves coordinating strong technical expertise and program knowledge from all partner agencies, as well as strong project management. As discussed above in Part One, the Department is in the process of developing data reports and metrics for the Pathways model. The WIOA mandates bring additional urgency to this work.

At the state level, the Department and EOLWD are addressing WIOA mandates to share infrastructure costs. Both the Department and EOLWD face resource constraints and might be reluctant to commit resources before they have assurance that joint service delivery will be effective. However, the WIOA State Plan asserts that there are “very high expectations for all WIOA partners to improve outcomes for business and individuals with barrier[s] to employment within the same levels of resources, or in some cases, less funding and staffing.”¹³⁹ Thus, it is essential that the Department and EOLWD examine infrastructure costs as part of the larger framework of aligning goals and streamlining processes, aiming to improve services to individuals with barriers as expeditiously as possible.

At the local level, representatives from the Department are contributing to regional workforce development boards and are responsible for creating protocols for referrals between TAOs and One-Stop Career Centers. By July 1, 2017, each of the 16 Massachusetts regions designated for WIOA planning are required to develop MOUs that are specific to their communities and that set forth plans for streamlined delivery of services. In certain areas, referral processes between TAOs and One-Stop Career Centers are developing from contractual relationships that establish many local career centers as CIES vendors providing services to TAFDC clients as they fulfill the Work Requirement.

As part of MOU planning, TAOs and One-Stop Career Centers in each region have opportunities to build a streamlined and efficient design for joint delivery of services. Together, taking into consideration the employment needs and resources in their communities, TAOs and One-Stop Career Centers can identify options for assessing and navigating shared clients through

¹³⁸ Id. at 344.

¹³⁹ See WIOA State Plan at 58.

programs and services to pursue self-sufficiency.¹⁴⁰ Additionally, they can cross-train staff to build mutual understanding of business processes and available programs and services. For the Department, this collaborative work aligns naturally with the renewed focus on the Work Requirement and self-sufficiency planning. It is critical for the Department to establish WIOA collaboration as an ongoing priority and support field managers as they contribute to their regional workforce development boards.

The highest level of planning for the implementation of WIOA is vested in the Workforce Skills Cabinet. The Workforce Skills Cabinet is a small group that includes the Secretary of EOLWD, the Secretary of Education, and the Secretary of Housing and Economic Development. The Workforce Skills Cabinet is “charged with finding a way to help people who are looking for work get the skills they need to fill the jobs that exist in the Commonwealth, and to help employers find qualified workers.”¹⁴¹

In the WIOA State Plan, there is a strategic goal “to deepen the cross-secretariat working relationships fostered by the Workforce Skills Cabinet structure, including continued collaboration on strategic planning, budgeting, and grant-making.” Following in this vein, the plan articulates a goal to “[c]ollaborate with Health and Human Services to connect human service populations to meaningful employment.”¹⁴² Thus, the Workforce Skills Cabinet is the logical forum for planning around the integration of workforce development resources, including the TANF block grant, across secretariats. In light of the role of the Workforce Skills Cabinet and the goal of establishing cross-secretariat working relationships, the Bureau is concerned that there is no representative from EOHHS or the Department appointed to the Workforce Skills Cabinet. Incorporating EOHHS into the Workforce Skills Cabinet is an immediate and straightforward step towards ensuring that Massachusetts not only fulfills WIOA mandates, but invests the most effective and efficient resources in the drive towards self-sufficiency for low-income families.¹⁴³

IV. Summary and Recommendations

During its research and analysis, the Bureau found a significant overlap between the issues related to the utilization of the TANF block grant and the implementation of WIOA. The WIOA plan addresses that overlap, stating that the Department, EOLWD, and partner agencies “intend to utilize the TANF block grant to expand education, training, employment and workforce activities to build more robust pathways for parents and caretakers receiving assistance.”¹⁴⁴ For the Bureau, the central theme that emerged was that there is an immediate

¹⁴⁰ *Id.* at 72-73. There are 33 One-Stop Career Centers across Massachusetts. According to the EOLWD website, last year, 100,000 job seekers who visited a One-Stop Career Center found employment. For more information see: <http://www.mass.gov/lwd/employment-services/one-stop-career-centers/connectjobs/>.

¹⁴¹ *See* Workforce Skills Cabinet, Office of the Governor, available at: <http://www.mass.gov/governor/administration/groups/workforceskillscommittee/> (last visited Nov. 7, 2016).

¹⁴² *See* WIOA State Plan at 47.

¹⁴³ *See* Bird at 12.

¹⁴⁴ *See* WIOA State Plan at 276.

need to create an overall strategy for supporting the self-sufficiency of low-income families that involves not only the Department, but EOLWD and other WIOA partners, as well as agencies administering programs and services under the TANF block grant. With this theme in mind, the Bureau recommends the following:

1. Secretariats and agencies that administer TANF and MOE-funded programs and services should plan and execute a joint strategy for utilizing the TANF block grant, track outcomes from the programs and services, and prioritize helping low-income families achieve self-sufficiency;
2. The Department should continue to partner with EOLWD to ensure that shared clients, including TAFDC recipients, have access to all available and appropriate workforce development resources and to monitor their progress towards self-sufficiency;
3. The Department and EOLWD should not only comply with WIOA mandates, but also maximize resources as expeditiously as possible to improve their delivery of services to shared clients; and
4. The Workforce Skills Cabinet should invite EOHHS and the Department to engage in strategic planning around the utilization of the TANF block grant and implementation of WIOA.

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Conclusion

In this report, the Bureau provided an update on the changes that the Department has made to its administration of the Work Requirement and examined larger contextual issues related to the Work Requirement. Overall, the Bureau found that, despite some missed opportunities, there have been positive developments since its July 2014 Review of the Work Requirement.

The Bureau found that the Department has taken steps to establish the Work Requirement as the focal point of the TAFDC program. The Department made a commitment to approaching TAFDC benefits as transitional and communicated it to staff. It implemented provisions of the Welfare Reform Statute requiring new intake processes and specialists in self-sufficiency planning for the TAFDC program. The Department introduced the new processes under the Pathways to Self Sufficiency model and developed a new assessment interview to identify TAFDC recipients' strengths and challenges.

The Bureau also found missed opportunities. For example, the Department did not adequately engage its field staff in planning the new intake processes, and it did not fully prepare staff for executing them. The Department did not provide field staff with guidance on how to utilize the information from assessment interviews to create an individualized self-sufficiency plan for each recipient. The Department trained and placed Self-Sufficiency Specialists in TAOs before it had laid a foundation for their work.

The Bureau examined larger contextual issues for the Work Requirement by analyzing two related topics: expenditures under the TANF block grant and the implementation of WIOA. The Bureau found that the TANF block grant funds a diverse array of programs and services, but the secretariats and agencies that administer them do not collaborate on strategic planning and monitoring outcomes. Furthermore, the Bureau found that implementing WIOA involves complex planning and coordination across multiple secretariats and agencies and requires alignment of goals and investments to improve the delivery of workforce development services. The Bureau concluded that the Department could expand resources for low-income families if it commits to productive partnerships related to the TANF block grant and WIOA implementation.

The Bureau set forth several recommendations for the Department to improve the TAFDC program through internal processes and external partnerships. For improvement on both fronts, the Bureau recommended that the Department prioritize the development of robust data metrics for the TAFDC program. The Department must continuously review data to analyze the service needs of TAFDC recipients and to monitor the impact of Department processes to determine if they support progress toward self-sufficiency. In addition, the Department must share data with other secretariats and agencies in an effort to plan and coordinate workforce development programs and services.

During ongoing monthly meetings, the Bureau and the Department have discussed this report and the Bureau's recommendations for continued improvement. The Department prepared a letter from the Commissioner and a summary of initiatives related to the Bureau's recommendations, which the Bureau has included in the next section of this report.

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Letter from Commissioner McCue and “Department of Transitional Assistance (DTA) Update on Departmental Efforts to Further Implement the TAFDC Work Requirement”



Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Transitional Assistance

CHARLES D. BAKER
Governor

MARYLOU SUDDERS
Secretary

KARYN POLITO
Lieutenant Governor

JEFF McCUE
Commissioner

November 7, 2016

The Honorable Glenn A. Cunha
Massachusetts Inspector General
One Ashburton Place, Room 1311
Boston, MA 02108

Inspector General Cunha:

Thank you for the opportunity to comment on the partnership between the Department of Transitional Assistance (DTA) and the Bureau of Program Integrity (BPI) as well as provide information on recently initiated improvements at DTA. Since Welfare Reform was signed into law in 2014, BPI has performed an exhaustive evaluation of its implementation, and DTA's performance in administering the Transitional Aid to Families with Dependent Children (TAFDC) work requirement. Our partnership has contributed to enhancements in DTA operations and services, and has served to foster the observations and recommendations reflected in this report. While DTA has yet to fully review the report itself, BPI has discussed the recommendations in this report, and I am confident from the information your office has already shared that the report will reflect the cooperative nature of our relationship and DTA's commitment to program, data, and operation transparency.

Similar to BPI's work with DTA over the last few years to stabilize the Supplemental Nutrition Assistance Program (SNAP) service delivery system for almost 800,000 recipients across the Commonwealth, BPI was afforded full access and unfettered transparency in their oversight activities. Through a productive and collaborative relationship built on interactions with agency staff at all levels, BPI has provided DTA with invaluable and objective risk assessments. While the implementation of these risk assessments sometimes exceeds the reach of available resources they afford DTA opportunities for immediate and short-term solutions, and have informed planning and goal development.

Beyond BPI's recommendations to improve existing programs, DTA and BPI have also worked on several joint projects that have yielded important information that will guide DTA in its future policy and program development. Our collaborative transportation project and our joint work evaluating wage match data are strong examples. During this transportation project, DTA and BPI worked together to analyze current transportation policy, federal requirements, efficiencies, and best practices to help DTA clients address a key barrier to employment, accessible transportation. As DTA pursues other new policy

proposals, we will again request and value BPI's assistance where this collaborative approach would be most advantageous.

Having stabilized SNAP service delivery, DTA has placed a renewed emphasis on our employment program to focus on comprehensive and innovative ways to assist our clients moving towards financial independence and self-sufficiency. While it is premature to determine if the Pathway to Self-Sufficiency (PSS) program is generating the desired outcomes in only its fourth month of operation, I am pleased that when I speak with DTA's front-line staff they talk with pride of this shift back to more meaningful client engagement. However, I recognize that this cultural shift has been hindered substantially by some identified technical challenges within our operating systems, but we remain committed to resolving all problems expeditiously. Additionally, DTA is focused on reinforcing this program through enhanced avenues of staff input, comprehensive continuous improvement measures, and a review of PSS-related client outcomes in December 2016 – six months post implementation.

Refining PSS, coupled with the submission of a combined Massachusetts Workforce Innovation and Opportunity Act (WIOA) plan provides a unique opportunity for improving avenues for financial independence for low income residents of the Commonwealth. As your office is aware, DTA has already been actively engaged with the Executive Office of Labor and Workforce Development in planning efforts to ensure DTA clients are afforded the full range of opportunities through WIOA and a closer relationship with the Commonwealth's Career Centers. This injection of new resources, a reinforced accountability to engaging low income and disabled job-seekers, sensitivity to regionally-based hiring needs, and integration of higher education institutions will serve to assist our clients in preparing for and finding employment. As has been the case in our recent collaborative efforts, the involvement of BPI would be most welcome and beneficial in securing the best outcomes for DTA clients.

DTA is eager to fully review this report and use its findings and recommendations in our ongoing program planning and continuous improvement initiatives. I look forward to our continuing collaborative relationship in providing enhanced opportunities to low income families across Massachusetts.

Regards,



Jeff McCue

Department of Transitional Assistance (DTA) Update on Departmental Efforts to Further Implement the TAFDC Work Requirement

Change Management

- **Project Management:** DTA has placed a renewed emphasis on project management, and in May 2016 hired a dedicated Director of Project Management. The Director is responsible for setting up systems and protocols that will enable DTA's individual projects and initiatives to be managed with better identified goals, benchmarks and timelines. Using project management principles when rolling out new initiatives will allow DTA to identify and appropriately gather input from all stakeholders, including better communicating with and informing DTA staff at various locations and programs. Overall, the use of project management principles will allow for better prioritization of DTA's resources. Use of project management best practices is important to DTA's commitment to continuous improvement, and DTA is currently assembling a project management training program for its senior staff.
- **Leadership, Empowerment, Assistance, Development (LEAD):** LEAD is a major Department initiative originally rolled out for statewide Supplemental Nutrition Assistance Program (SNAP) staff and aimed at strengthening our staff through improved supervision. Implementation for SNAP staff was phased in across the state and completed in October 2016. Originally launched as a pilot to assess strengths and areas for enhancement, LEAD helps supervisory staff perform their jobs well and allows them the ability to not only train and assist their staff, but also to mentor to help them grow within DTA. Through a series of standardized case reviews, enhanced performance reviews, and monthly one on one meetings, supervisors are critical to staff development. This program has also allowed supervisors to aid their staff in delivering benefits in an accurate and timely way. Due to the overwhelmingly positive feedback and outcomes this program has brought, DTA will move to implement a LEAD initiative for cash staff in 2017. DTA used the Public Consulting Group's (PCG) assistance in its LEAD SNAP work, and is using PCG for assistance with its next implementation of LEAD for financial assistance benefits. In September, DTA's LEAD Pilot team was rewarded for their outstanding work with the Commonwealth's Eugene H. Rooney Jr. Public Service Award. The Rooney award highlights human resource development as a planned, continuous effort to provide personal and professional growth opportunities that will enhance employee competency levels.
- **Training:** DTA has been actively engaging with both central office staff as well as field staff to better understand what training activities would be helpful from a system, policy, and learning standpoint. DTA plans to implement an enhanced training approach beginning in early 2017.
 - Pre-training assessment: Moving forward, before training is launched to the field DTA will pilot that training with field staff from across the Commonwealth. This will allow DTA to preview training plans and curricula to a group who will be responsible for its successful implementation. Additionally, this will allow DTA's training unit to identify any areas that need to be modified before training is released statewide.
 - Post-training assessment: DTA plans to seek feedback from field staff not only before and during their trainings, but also once the training has been completed. DTA will make use of its new FAWG meetings to solicit feedback from field staff on trainings. DTA will then in turn use this information to modify ongoing trainings as needed.
 - Motivational Interviewing: DTA is pursuing working with an outside expert to develop a motivational interviewing curriculum for DTA staff.

- Pathways Training v.2: DTA continues to address system issues that have stressed the initial Pathways rollout to ensure these pain points are fixed. Once DTA is confident that the system corrections are implemented, additional training for Pathways will be rolled out to staff. DTA is committed to ensuring our staff has the best possible training, and that requires a fully functional system. These new trainings will incorporate many of the constructive suggestions BPI has made and additional feedback secured from front line staff and supervisors.
- **Field Advisory Working Group (FAWG)**: At the direction of the Commissioner, DTA has assembled a working group that brings together staff from all levels of DTA and all corners of the Commonwealth. This group held its first meeting at the end of September and meets monthly to discuss essential ongoing DTA activities. The goal of the group is to receive first-hand on-the-ground information about what is happening in local offices, how policy is being practically applied, what needs are not being met, solicit feedback on upcoming policy changes, and implement the recommendations received from this group. As such, it fits squarely into DTA's new emphasis on using field input to drive continuous improvement and change management.
- **Sister Agencies**: Commencing with the appointment of Secretary Sudders, DTA initiated a number of on-going policy discussions with sister agencies that serve similar clients around shared policy goals. Agencies include: Department of Children and Families, MassHealth, Department of Early Education and Care, Executive Office of Labor and Workforce Development, Department of Veteran's Affairs, Executive Office of Elder Affairs, and Department of Housing and Community Development. This affords DTA new opportunities to achieve positive outcomes for whole families.
- **Advocacy Group Engagement**: DTA values our partnership with the many committed advocacy organizations across the Commonwealth. DTA staff regularly and proactively engages with these groups at their meetings or work individually with these partners on policy and procedure during development and implementation. Beginning in July 2015 members of advocacy groups have been serving on several internal DTA working groups to address DTA forms, verifications, and SNAP timeliness.
- **DTA Advisory Boards**: Last spring, DTA began work to reinvigorate its Advisory Boards in order to build a process that will work for its stakeholders just as well as it will work for DTA. Recommendations have been developed and DTA recently started engaging with advocate stakeholders to discuss the recommendations and get feedback. The goal is to make changes to the Boards in the next few months. DTA views its Advisory Boards as untapped potential for gathering stakeholder, client and advocacy group feedback of new policies and programs, as well as DTA's local office and client challenges and performance.

Assessment

- **Full Engagement Worker (FEW) Development**: The FEWs in each of DTA's local offices are critical to our clients' successes. Ensuring that these workers are well versed in identifying barriers to employment is essential. Also key to our clients' successes is that the FEWs and the cash benefit staff in each office work well together. FEWs are brought together each month so that essential information may be communicated and taken back to each TAO. Building upon a best-practice identified at one of DTA's local offices, in early 2017 DTA will be implementing monthly meetings

between cash staff and FEWs in each office so that the local office FEWs can share with cash staff information about local resources and supports that are available to clients.

- **Mathematica Policy Research:** In summer 2016, a senior policy expert at Mathematica began performing a TANF program assessment for DTA. In the months ahead, Mathematica will talk with office directors, assistant directors, Transitional Aid to Families with Dependent Children (TAFDC) supervisors, case managers, and full engagement workers to begin this assessment. The purpose of this engagement is to explore Massachusetts' implementation of the TANF program with specific consideration given to:
 - How could DTA reconsider current service delivery and program practices with regard to a "one-size-fits-all" model versus a locally-driven model?
 - How is staff at DTA currently being utilized and how might they be repurposed in consolidated or specialized roles to better serve clients?
 - How could DTA take full advantage of TANF integration with the Workforce Innovation and Opportunity Act (WIOA) programing?
- **Local Academic Engagement:** DTA is currently engaged with the University of MA Boston's Center for Social Policy and with Simmons College around engagement in a number of topics that are of joint interest, including studying ways DTA can help disabled clients gain the skills they need to obtain employment, and the nexus of early DTA engagement and child welfare.
- **LEAD for Cash Programs:** As mentioned, in 2017 DTA will be implementing LEAD for our cash benefit programs with the goal of achieving similar results for our clients as LEAD for SNAP has achieved. This will allow supervisors more time to serve as real leaders throughout the agency, give them more time to mentor and grow their staff, and will allow cash caseworkers to better prepare their clients for their path to self-sufficiency. LEAD for cash will also include performance metrics for local office productivity, accuracy and Pathways.

Data Metrics and Analysis

- **New Emphasis on Data and Reporting:** DTA is developing new policy protocols that identify desired policy goals and pre-implementation baseline data, along with on-going performance metrics and client outcomes that can inform new policy effectiveness. Essential to these goals is DTA's emphasis on hiring staff with intricate technical knowledge. Examples of DTA's new data and reporting emphasis include:
 - **Assistant Chief Information Officer (ACIO)**
 - EHS and DTA have recently selected an Assistant Chief Information Officer (ACIO) who will be dedicated in full to DTA's needs. It is hoped this preferred candidate will be appointed as early as mid-November 2016. In the past, DTA has shared the ACIO role with other EHS agencies and the position has been vacant for many months recently. DTA will benefit greatly from having a senior IT professional dedicated to managing the team and resources supporting DTA's systems and operations.
 - **Business Data Analysts**
 - A year ago DTA's Research, Policy, and Evaluation Unit had only one business analyst who primarily addressed data research related to the SNAP program's business process redesign (BPR). Beginning in spring 2016, DTA's business data

analysis capabilities greatly expanded and now include five analysts who are supervised by a manager. DTA's business data analysts are responsible for data research and analysis for all key agency programs and initiatives through expert data compilation, distribution, analysis, and management.

- **Financial Analysts**
 - In mid-2016, DTA added three financial analysts to its expanding analytics team. Each of these highly-technical staff brings advanced analytical and statistical expertise, with strength in collecting, extracting, and managing complex data sets. As a result, the Budget Unit is now better positioned to support ad-hoc data requests, and complex analysis and forecasting, as the need across the Department continues to grow.
- **Policy Analysts**
 - In October 2016, DTA hired three policy analysts to focus on TAFDC, Emergency Aid to the Elderly, Disabled and Children (EAEDC), welfare reform, and other cash policy development and analysis. These positions will help DTA build its research and analytic capacity to identify key policy challenges, analyze data trends, develop and test policy options, and design implementation plans to support effective change management. They will also be essential in helping assess and adjust existing policy initiatives to ensure they are having the desired impact.
- **Development and Utilization of Pathways Metrics**
 - DTA developed the Pathways to Self-Sufficiency program to support early and effective engagement with clients to identify their strengths and challenges to employment. Essential to this goal is collecting quality and valid data and utilizing that data to not only match clients to relevant supports but to identify any systematic changes needed to align resources to the new approach.
 - Early in the Pathways implementation, IT system issues and flaws were identified that affect both daily operations in DTA's local offices and the overall data results. Those noted systems issues presented DTA challenges that are currently being addressed with field input.
 - Early data from Pathways client assessments shows that clients continue to identify child care, transportation, limited language and writing skills as well as limited work experience as their key challenges. This new assessment tool, however, will allow DTA to have access to this data for all clients in a more consistent and quality manner.
 - Attendance at client orientations has more than doubled as a result of the new Pre Benefit Job Search (PBJs) requirements exposing clients to resources, supports and community programs in their initial month of application. Early data show that three months before Pathways was implemented, 4,064 clients attended TAFDC orientations. For the three month time period after Pathways was implemented that attendance had more than doubled to 9,974 clients attending orientation.
 - DTA will utilize established internal agency working groups and, depending upon resources, engage with outside entities / academic affiliates to perform a six month review of the Pathways to Self-Sufficiency program to identify strengths as well as areas for improvement.
- **Ongoing Local Office Quality Control (LOQC) Self-Assessment:** While it is important for DTA to receive outside perspective on policy, implementation, and ongoing management, it is just as important to perform ongoing self-assessments. LOQC staff has performed a review of DTA's cash

programs, specifically looking at eligibility; LOQC will continue similar work as Pathways is fully implemented to provide a similar perspective for the agency.

Staff Engagement

- DTA is also committed to engaging field and central office staff to solicit input when developing policy and changing operations. New vehicles for soliciting staff input include:
 - **Monthly Cash Benefit Policy Calls:** Cash benefit policy calls began in August 2016 between the cash benefit program director and local office supervisors from across the Commonwealth. Each monthly call has an established field generated agenda with time for questions and answers.
 - **Program Accuracy Council:** Another result of the SNAP LEAD program, this sees a team of Central Office staff coming together to review errors that are identified through supervisory, assistant director, LOQC and QC reviews. This Council will be expanded in the next few months to include LEAD for cash benefits. Once errors are identified and diagnosed, recommendations regarding communication and training will be made to reduce errors in the future.
 - **Field Advisory Working Group (FAWG):** As mentioned previously, FAWG is a group of field and central office staff that convene monthly meetings to discuss policy, operations, and management topics. This group recommends policy and procedural modifications, and DTA moves to implement those recommendations.
 - **Weekly Commissioner Message:** Commissioner McCue began sending a weekly message to staff in early 2016 as a way to directly communicate with every DTA employee across the Commonwealth. These messages are often focused on a weekly theme that other areas of the agency have been targeting. Training and policy priorities are reinforced by the Commissioner in an informal way. These messages have been well received by staff, and Commissioner McCue often receives feedback on the issue which he is addressing directly from staff.
 - **Supervisor Roundtables:** Beginning in September DTA established regular roundtable discussions for TAFDC and EAEDC Supervisors. The initial meetings focused on Pathways implementation and LEAD for cash were held in Worcester, Framingham, New Bedford, Springfield and Boston. Going forward, these discussions serve to solicit input and feedback on wide ranging policy topics. Both Central Office staff and field supervisors contribute to the agenda for each discussion.

System Enhancements

- **Systems Information Specialists (SIS):** Systems Information Specialists (SIS) are identified supervisors who serve in a liaison role to transcend both technical systems issues and policy issues for their colleagues. Each local office across the Commonwealth has identified their SIS. These positions were created in October 2016 due to requests from local offices across the Commonwealth as a way to better communicate and streamline questions and answers regarding policy and systems issues. Common examples of questions fielded by SIS in the local offices are known systems issues, workarounds, and common policy questions. This role enhances and formalizes systems support in every local office and upgrades from the previous role of Systems Support Liaison.

Each TAO has selected a member of their supervisory team to serve as that office's SIS. Further, an IT staffer will be designated to work with the SIS as an IT liaison. There will be a monthly meeting of all SIS with central office management along with IT staff to discuss common issues and answer specific questions. The goal of this role is for each office to have someone to provide local leadership relating to any IT and policy issues.

- **Enhanced Systems Testing and Policy Functionality:** DTA has embraced User Acceptance Testing (UAT) before the rollout of systems builds. This is an enhancement over previous testing, which occurred largely within and by the Management Information System (MIS) unit. Now, DTA identifies field staff that then spends time testing the new system for not only any technical issues that may arise, but ensuring that the functionality reflects policy. DTA views UAT as essential components to a successful launch.

Further, each SIS will be responsible for working with program and technical leadership to build a beta testing phase following UAT. Beta testing will ensure a wide group of field staff are able to test new systems with practical policy scenarios. This ensures end-user functionality that enhances real-world delivery of services to clients.

Self-Sufficiency Specialists Role

Self Sufficiency Specialists (SSS) began their new role at DTA in December 2015. In preparation to launch this new role, a detailed job description was developed, training was developed and conducted, and policy documentation about the new role and who it would serve was issued.

Between April and June 2016, DTA conducted an assessment of how the role was functioning and identified ways to strengthen and clarify their role. While many positive findings resulted from this assessment, there remained issues regarding legislatively mandated caseload caps for these workers. This assessment also concluded limiting the agency's ability to best utilize resources as policy and circumstance demand would not serve our clients well.

The rollout of Pathways to Self Sufficiency made it clear that any manufactured caseload cap would have an adverse impact on DTA's ability to manage resources and move all clients toward self-sufficiency. All Case Managers must utilize their skills and be allowed the time to engage with clients with barriers to employment. Limiting some caseworker's caseloads results in increases to other caseworker's caseloads. Ensuring all caseworkers have manageable caseloads is critical, and DTA needs the discretion to make the appropriate decisions regarding what a manageable caseload means.

As a result, the following recommendations were developed and implemented:

- SSS provide intensive case management and support to all teen parents who are heads of household, whether parenting or pregnant.
- Other clients who *may* receive the assistance of an SSS include:
 - young parents (pregnant and/or parenting heads of household under the age of 24);
 - residents of emergency assistance shelter, Hotel/Motel, Congregate Shelter, Scattered Site Shelter or Domestic Violence Shelter
- In limited circumstances, and as determined by a DTA manager, SSSs may also assist other clients who have been identified as having significant challenges in moving towards self-sufficiency.

- Each DTA local office to have at least one SSS, with a caseload limited to 60 active clients per specialist. Due to caseload limits, assignment of an SSS will be based on availability.
- Effective September 2016, surplus SSSs were reassigned to the cash caseload in order to bring overall caseloads down.
- Additionally, with Pathways now in place, DTA will be able to utilize data to evolve the function of SSS to best serve our clients.

Managers and those serving in the SSS capacity were notified in July of the planned changes with implementation going into effect in early September 2016. Revisions were made to the On-Line Guide to reflect the change/clarification in the role, which were published in late August in anticipation of the implementation.

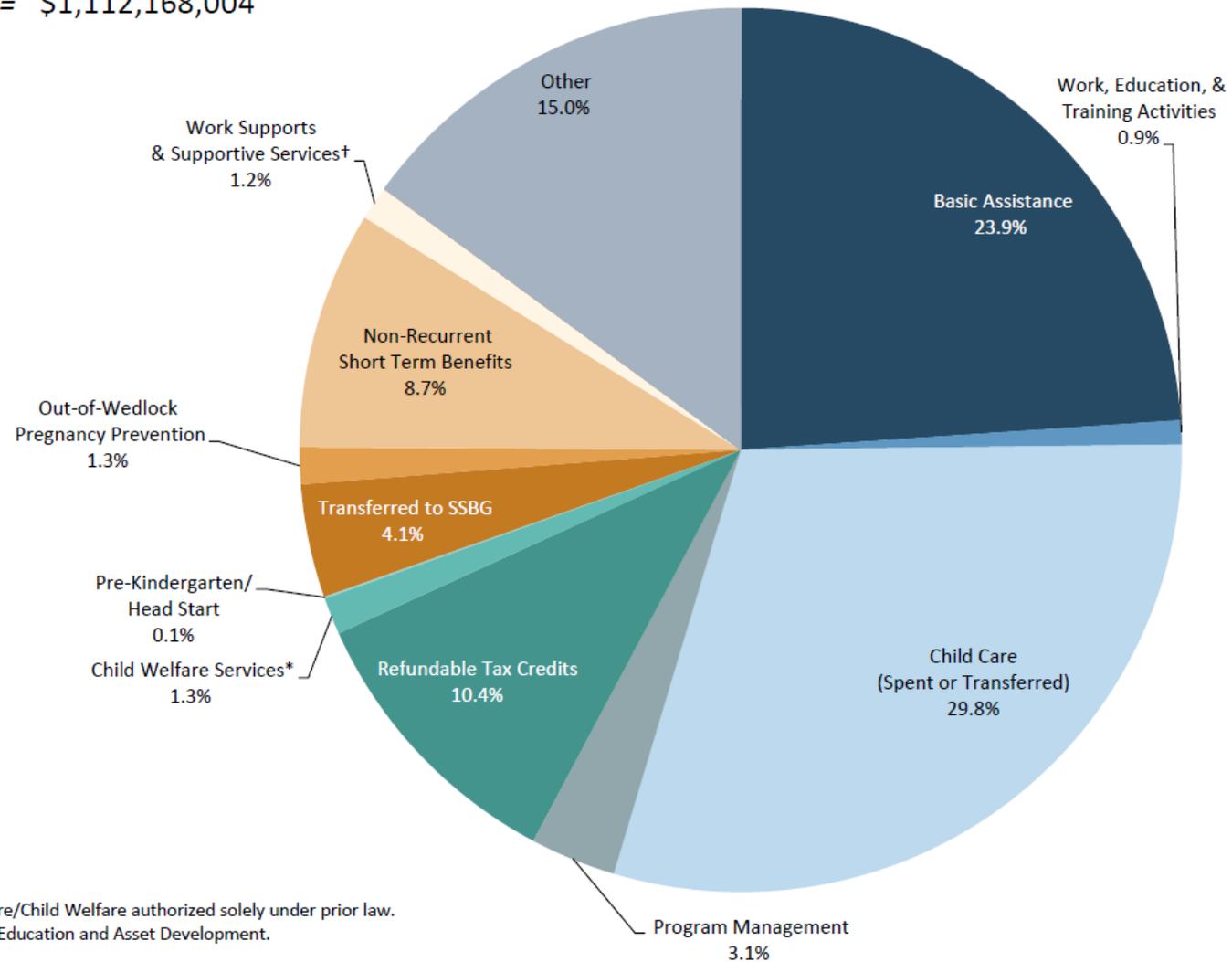
This shift was in conjunction with establishing specialized EAEDC workers in spring 2016. This established staff dedicated to either an EAEDC caseload or TAFDC caseload where appropriate. The objective of this change was to lower the average caseload for TAFDC caseworkers so they would have more time to focus on moving clients toward self-sufficiency. This was realized, and currently the average TAFDC caseload is approximately 140 clients, a drop from the previous median which approached 200 cases per worker. Allowing TAFDC caseworkers more time to engage with clients assists DTA in breaking down barriers and helping clients obtain employment and begin on a path to self-sufficiency.

Appendix A:

TANF and MOE Spending and Transfers by Activity, FY 2015: Massachusetts and United States

TANF and MOE Spending and Transfers by Activity, FY 2015: Massachusetts

Total Funds = \$1,112,168,004



* Including Foster Care/Child Welfare authorized solely under prior law.

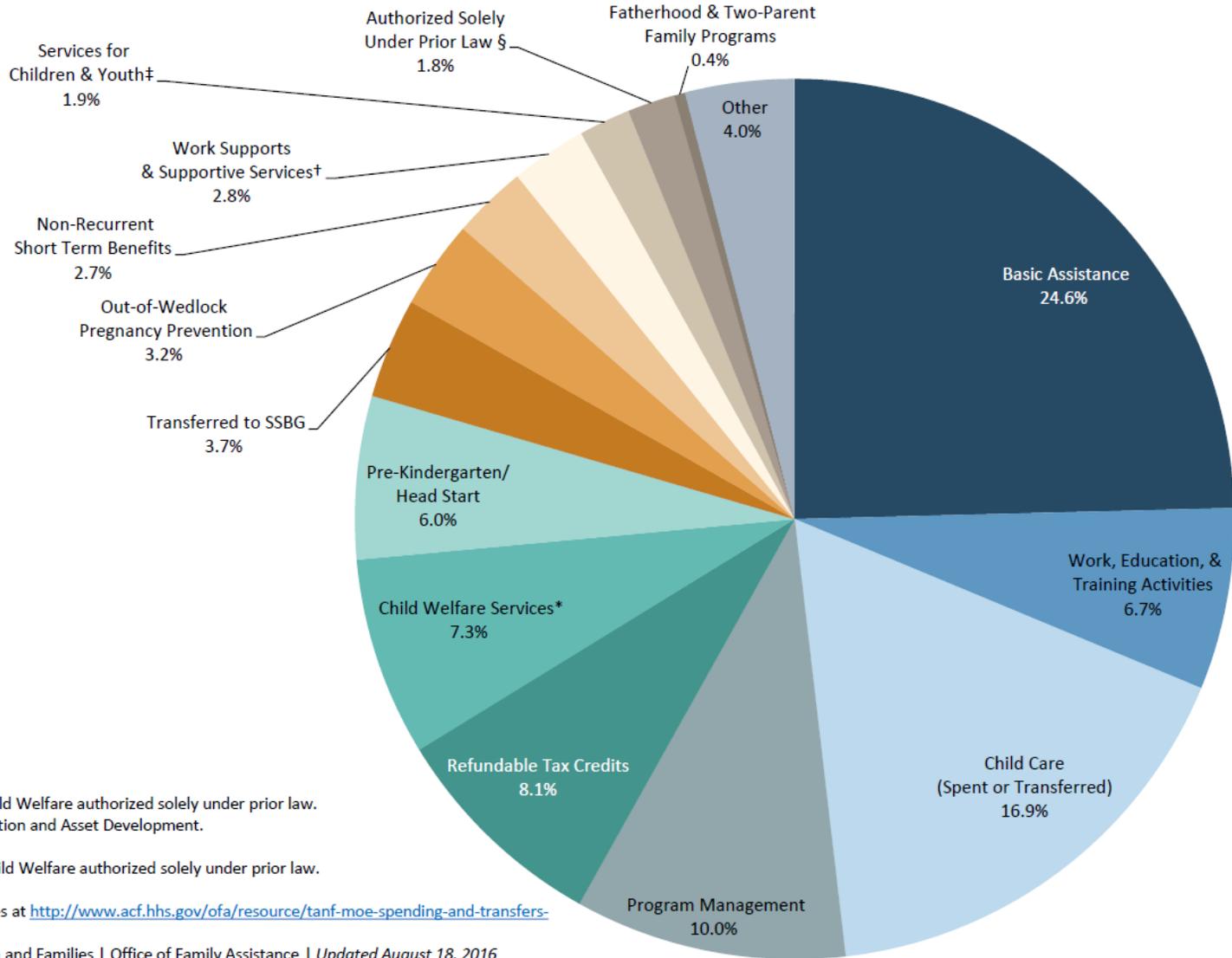
† Including Financial Education and Asset Development.

See definitions of categories at <http://www.acf.hhs.gov/ofa/resource/tanf-moe-spending-and-transfers-2015-definitions>.

Administration for Children and Families | Office of Family Assistance | Updated August 3, 2016

TANF and MOE Spending and Transfers by Activity, FY 2015: United States

Total Funds = \$31,688,988,321



* Including Foster Care/Child Welfare authorized solely under prior law.

† Including Financial Education and Asset Development.

‡ Including Home Visiting.

§ Excluding Foster Care/Child Welfare authorized solely under prior law.

See definitions of categories at <http://www.acf.hhs.gov/ofa/resource/tanf-moe-spending-and-transfers-2015-definitions>

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Appendix B:

TANF and MOE Expenditures Summary by ACF-196 Spending Category, FY 2015:
Massachusetts and Federal

Massachusetts: Federal TANF and State MOE Expenditures Summary by ACF-196 Spending Category, FY 2015

Spending Category	Federal Funds	State MOE in TANF and Separate State Programs	All Funds	Percent of Total Funds Used
Basic Assistance	\$10,500,000	\$255,655,892	\$266,155,892	23.9%
<i>Basic Assistance (excluding Relative Foster Care Maintenance Payments and Adoption and Guardianship Subsidies)</i>	\$10,500,000	\$255,655,892	\$266,155,892	23.9%
<i>Relative Foster Care Maintenance Payments and Adoption and Guardianship Subsidies</i>	\$0	\$0	\$0	0.0%
Assistance Authorized Solely Under Prior Law	\$0		\$0	0.0%
<i>Foster Care Payments</i>	\$0		\$0	0.0%
<i>Juvenile Justice Payments</i>	\$0		\$0	0.0%
<i>Emergency Assistance Authorized Solely Under Prior Law</i>	\$0		\$0	0.0%
Non-Assistance Authorized Solely Under Prior Law	\$0		\$0	0.0%
<i>Child Welfare or Foster Care Services</i>	\$0		\$0	0.0%
<i>Juvenile Justice Services</i>	\$0		\$0	0.0%
<i>Emergency Services Authorized Solely Under Prior Law</i>	\$0		\$0	0.0%
Work, Education, and Training Activities	\$0	\$9,783,041	\$9,783,041	0.9%
<i>Subsidized Employment</i>	\$0	\$0	\$0	0.0%
<i>Education and Training</i>	\$0	\$6,112,004	\$6,112,004	0.5%
<i>Additional Work Activities</i>	\$0	\$3,671,037	\$3,671,037	0.3%
Work Supports	\$0	\$0	\$0	0.0%
Early Care and Education	\$195,918,146	\$44,973,367	\$240,891,513	21.7%
<i>Child Care (Assistance and Non-Assistance)</i>	\$195,057,479	\$44,973,367	\$240,030,846	21.6%
<i>Pre-Kindergarten/Head Start</i>	\$860,667	\$0	\$860,667	0.1%
Financial Education and Asset Development	\$0	\$0	\$0	0.0%
Refundable Earned Income Tax Credits	\$0	\$115,984,573	\$115,984,573	10.4%
Non-EITC Refundable State Tax Credits	\$0	\$0	\$0	0.0%
Non-Recurrent Short Term Benefits	\$0	\$96,740,969	\$96,740,969	8.7%
Supportive Services	\$0	\$13,839,756	\$13,839,756	1.2%
Services for Children and Youth	\$0	\$0	\$0	0.0%
Prevention of Out-of-Wedlock Pregnancies	\$0	\$15,010,037	\$15,010,037	1.3%
Fatherhood and Two-Parent Family Formation and Maintenance Programs	\$0	\$0	\$0	0.0%
Child Welfare Services	\$0	\$14,941,258	\$14,941,258	1.3%
<i>Family Support/Family Preservation /Reunification Services</i>	\$0	\$14,941,258	\$14,941,258	1.3%
<i>Adoption Services</i>	\$0	\$0	\$0	0.0%
<i>Additional Child Welfare Services</i>	\$0	\$0	\$0	0.0%
Home Visiting Programs	\$0	\$0	\$0	0.0%
Program Management	\$0	\$34,693,280	\$34,693,280	3.1%
<i>Administrative Costs</i>	\$0	\$34,693,280	\$34,693,280	3.1%
<i>Assessment/Service Provision</i>	\$0	\$0	\$0	0.0%
<i>Systems</i>	\$0	\$0	\$0	0.0%
Other	\$166,316,351	\$0	\$166,316,351	15.0%
TOTAL EXPENDITURES	\$372,734,497	\$601,622,173	\$974,356,670	87.6%
Transferred to CCDF Discretionary	\$91,874,224		\$91,874,224	8.3%
Transferred to SSBG	\$45,937,110		\$45,937,110	4.1%
Total Transfers	\$137,811,334		\$137,811,334	12.4%
TOTAL FUNDS USED	\$510,545,831	\$601,622,173	\$1,112,168,004	100.0%
Federal Unliquidated Obligations	\$0		\$0	
Unobligated Balance	\$0		\$0	

A.1.: Federal TANF and State MOE Expenditures Summary by ACF-196 Spending Category, FY 2015

Spending Category	Federal Funds	State MOE in TANF and Separate State Programs	All Funds	All Funds Percent of Total Funds Used
Basic Assistance	\$4,157,543,967	\$3,639,815,739	\$7,797,359,706	24.6%
<i>Basic Assistance (excluding Relative Foster Care Maintenance Payments and Adoption and Guardianship Subsidies)</i>	\$4,013,145,416	\$3,525,283,180	\$7,538,428,596	23.8%
<i>Relative Foster Care Maintenance Payments and Adoption and Guardianship Subsidies</i>	\$144,398,551	\$114,532,559	\$258,931,110	0.8%
Assistance Authorized Solely Under Prior Law	\$694,017,350		\$694,017,350	2.2%
<i>Foster Care Payments</i>	\$380,421,468		\$380,421,468	1.2%
<i>Juvenile Justice Payments</i>	\$49,257,529		\$49,257,529	0.2%
<i>Emergency Assistance Authorized Solely Under Prior Law</i>	\$264,338,353		\$264,338,353	0.8%
Non-Assistance Authorized Solely Under Prior Law	\$633,906,748		\$633,906,748	2.0%
<i>Child Welfare or Foster Care Services</i>	\$389,335,677		\$389,335,677	1.2%
<i>Juvenile Justice Services</i>	\$64,859,342		\$64,859,342	0.2%
<i>Emergency Services Authorized Solely Under Prior Law</i>	\$179,711,729		\$179,711,729	0.6%
Work, Education, and Training Activities	\$1,555,337,424	\$556,129,647	\$2,111,467,071	6.7%
<i>Subsidized Employment</i>	\$155,775,055	\$30,509,342	\$186,284,397	0.6%
<i>Education and Training</i>	\$158,021,243	\$210,471,459	\$368,492,702	1.2%
<i>Additional Work Activities</i>	\$1,241,541,126	\$315,148,846	\$1,556,689,972	4.9%
Work Supports	\$416,187,697	\$47,685,843	\$463,873,540	1.5%
Early Care and Education	\$1,302,553,935	\$4,627,347,434	\$5,929,901,369	18.7%
<i>Child Care (Assistance and Non-Assistance)</i>	\$1,250,115,096	\$2,781,397,772	\$4,031,512,868	12.7%
<i>Pre-Kindergarten/Head Start</i>	\$52,438,839	\$1,845,949,662	\$1,898,388,501	6.0%
Financial Education and Asset Development	\$1,544,074	\$23,688	\$1,567,762	0.0%
Refundable Earned Income Tax Credits	\$166,587,560	\$1,821,745,304	\$1,988,332,864	6.3%
Non-EITC Refundable State Tax Credits	\$0	\$584,162,935	\$584,162,935	1.8%
Non-Recurrent Short Term Benefits	\$295,760,983	\$569,197,757	\$864,958,740	2.7%
Supportive Services	\$220,558,207	\$196,743,432	\$417,301,639	1.3%
Services for Children and Youth	\$224,904,105	\$342,659,711	\$567,563,816	1.8%
Prevention of Out-of-Wedlock Pregnancies	\$539,605,884	\$487,843,139	\$1,027,449,023	3.2%
Fatherhood and Two-Parent Family Formation and Maintenance Programs	\$88,149,236	\$40,287,809	\$128,437,045	0.4%
Child Welfare Services	\$989,947,678	\$548,922,333	\$1,538,870,011	4.9%
<i>Family Support/Family Preservation /Reunification Services</i>	\$518,396,238	\$296,701,484	\$815,097,722	2.6%
<i>Adoption Services</i>	\$12,982,617	\$12,759,105	\$25,741,722	0.1%
<i>Additional Child Welfare Services</i>	\$458,568,823	\$239,550,770	\$698,119,593	2.2%
Home Visiting Programs	\$21,310,468	\$7,629,312	\$28,939,780	0.1%
Program Management	\$2,089,814,956	\$1,068,747,261	\$3,158,562,217	10.0%
<i>Administrative Costs</i>	\$1,154,324,955	\$802,708,257	\$1,957,033,212	6.2%
<i>Assessment/Service Provision</i>	\$732,870,776	\$194,720,577	\$927,591,353	2.9%
<i>Systems</i>	\$202,619,225	\$71,318,427	\$273,937,652	0.9%
Other	\$466,766,764	\$800,164,769	\$1,266,931,533	4.0%
TOTAL EXPENDITURES	\$13,864,497,036	\$15,339,106,113	\$29,203,603,149	92.2%
Transferred to CCDF Discretionary	\$1,320,312,823		\$1,320,312,823	4.2%
Transferred to SSBG	\$1,165,072,349		\$1,165,072,349	3.7%
Total Transfers	\$2,485,385,172		\$2,485,385,172	7.8%
TOTAL FUNDS USED	\$16,349,882,208	\$15,339,106,113	\$31,688,988,321	100.0%
Federal Unliquidated Obligations	\$1,438,083,001		\$1,438,083,001	

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Appendix C:

TANF and MOE Expenditures Summary by ACF-196 Spending Category, FY 2014:
Massachusetts and Federal

Massachusetts: Federal TANF and State MOE Expenditures Summary by ACF-196 Spending Category, FY 2014

Spending Category	All Federal Funds	State MOE in TANF and Separate State Programs	Total Funds	Total Funds as a Percent of Total Funds Used
TOTAL EXPENDITURES ON ASSISTANCE	\$44,015,175	\$248,685,093	\$292,700,268	26.6%
<i>BASIC ASSISTANCE</i>	\$44,015,175	\$248,685,093	\$292,700,268	26.6%
<i>CHILD CARE</i>	\$0	\$0	\$0	0.0%
<i>TRANSPORTATION AND SUPPORTIVE SERVICES</i>	\$0	\$0	\$0	0.0%
<i>ASSISTANCE UNDER PRIOR LAW</i>	\$0	\$0	\$0	0.0%
TOTAL EXPENDITURES ON NON-ASSISTANCE	\$323,160,213	\$346,254,180	\$669,414,393	60.9%
<i>WORK RELATED ACTIVITIES/ EXPENSES</i>	\$0	\$6,395,047	\$6,395,047	0.6%
<i>CHILD CARE</i>	\$186,750,776	\$44,973,368	\$231,724,144	21.1%
<i>TRANSPORTATION</i>	\$0	\$0	\$0	0.0%
<i>INDIVIDUAL DEVELOPMENT ACCOUNTS</i>	\$0	\$0	\$0	0.0%
<i>REFUNDABLE EITC</i>	\$0	\$114,321,628	\$114,321,628	10.4%
<i>OTHER REFUNDABLE TAX CREDITS</i>	\$0	\$0	\$0	0.0%
<i>NON-RECURRENT SHORT-TERM BENEFITS</i>	\$0	\$86,821,664	\$86,821,664	7.9%
<i>PREVENTION OF OUT OF WEDLOCK PREGNANCIES</i>	\$5,313,883	\$10,255,008	\$15,568,891	1.4%
<i>TWO-PARENT FAMILY FORMATION AND MAINTENANCE</i>	\$0	\$0	\$0	0.0%
<i>ADMINISTRATION</i>	\$0	\$34,616,055	\$34,616,055	3.1%
<i>SYSTEMS</i>	\$0	\$0	\$0	0.0%
<i>NON-ASSISTANCE UNDER PRIOR LAW</i>	\$0	\$0	\$0	0.0%
<i>OTHER</i>	\$131,095,554	\$48,871,410	\$179,966,964	16.4%
TOTAL ASSISTANCE AND NON-ASSISTANCE EXPENDITURES	\$367,175,388	\$594,939,273	\$962,114,661	87.5%
TRANSFERRED TO CHILD CARE DEVELOPMENT FUND (CCDF)	\$91,874,224		\$91,874,224	8.4%
TRANSFERRED TO SOCIAL SERVICES BLOCK GRANT (SSBG)	\$45,937,115		\$45,937,115	4.2%
TOTAL TRANSFERS	\$137,811,339		\$137,811,339	12.5%
TOTAL FUNDS USED	\$504,986,727	\$594,939,273	\$1,099,926,000	100.0%
UNLIQUIDATED OBLIGATIONS	\$0		\$0	
UNOBLIGATED BALANCE	\$0		\$0	

A.1.: Federal TANF and State MOE Expenditures Summary by ACF-196 Spending Category, FY 2014

Spending Category	Federal Funds	State MOE in TANF and Separate State Programs	All Funds	All Funds Percent of Total Funds Used
TOTAL EXPENDITURES ON ASSISTANCE	\$5,369,771,963	\$4,216,522,618	\$9,586,294,581	30.1%
<i>BASIC ASSISTANCE</i>	\$4,485,938,448	\$3,957,480,683	\$8,443,419,131	26.5%
<i>CHILD CARE</i>	\$71,669,952	\$219,893,248	\$291,563,200	0.9%
<i>TRANSPORTATION AND SUPPORTIVE SERVICES</i>	\$240,639,133	\$39,148,687	\$279,787,820	0.9%
<i>ASSISTANCE UNDER PRIOR LAW</i>	\$571,524,430		\$571,524,430	1.8%
TOTAL EXPENDITURES ON NON-ASSISTANCE	\$8,657,333,093	\$11,107,299,422	\$19,764,632,515	62.0%
<i>WORK RELATED ACTIVITIES/ EXPENSES</i>	\$1,621,335,483	\$546,924,638	\$2,168,260,121	6.8%
<i>CHILD CARE</i>	\$1,160,603,769	\$2,292,020,754	\$3,452,624,523	10.8%
<i>TRANSPORTATION</i>	\$141,844,186	\$28,193,138	\$170,037,324	0.5%
<i>INDIVIDUAL DEVELOPMENT ACCOUNTS</i>	\$698,956	\$144,729	\$843,685	0.0%
<i>REFUNDABLE EITC</i>	\$163,273,911	\$1,855,145,937	\$2,018,419,848	6.3%
<i>OTHER REFUNDABLE TAX CREDITS</i>	\$0	\$547,154,997	\$547,154,997	1.7%
<i>NON-RECURRENT SHORT-TERM BENEFITS</i>	\$233,914,531	\$482,259,379	\$716,173,910	2.2%
<i>PREVENTION OF OUT OF WEDLOCK PREGNANCIES</i>	\$845,599,843	\$1,734,035,546	\$2,579,635,389	8.1%
<i>TWO-PARENT FAMILY FORMATION AND MAINTENANCE</i>	\$215,994,789	\$41,714,856	\$257,709,645	0.8%
<i>ADMINISTRATION</i>	\$1,236,856,515	\$816,983,816	\$2,053,840,331	6.4%
<i>SYSTEMS</i>	\$173,097,519	\$48,309,022	\$221,406,541	0.7%
<i>NON-ASSISTANCE UNDER PRIOR LAW</i>	\$876,895,435		\$876,895,435	2.7%
<i>OTHER</i>	\$1,987,218,156	\$2,714,412,610	\$4,701,630,766	14.7%
TOTAL ASSISTANCE AND NON-ASSISTANCE EXPENDITURES	\$14,027,105,056	\$15,323,822,040	\$29,350,927,096	92.0%
TRANSFERRED TO CHILD CARE DEVELOPMENT FUND (CCDF)	\$1,382,417,347		\$1,382,417,347	4.3%
TRANSFERRED TO SOCIAL SERVICES BLOCK GRANT (SSBG)	\$1,155,909,378		\$1,155,909,378	3.6%
TOTAL TRANSFERS	\$2,538,326,725		\$2,538,326,725	8.0%
TOTAL FUNDS USED	\$16,565,431,781	\$15,323,822,040	\$31,889,253,821	100.0%
UNLIQUIDATED OBLIGATIONS	\$1,730,114,572		\$1,730,114,572	
UNOBLIGATED BALANCE	\$1,621,952,261		\$1,621,952,261	

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Appendix D:

TANF and MOE Expenditures Summary by ACF-196 Spending Category, FY 2013:
Massachusetts and Federal

Massachusetts: Federal TANF and State MOE Expenditures Summary by ACF-196 Spending Category, FY 2013

Spending Category	All Federal Funds	State MOE in TANF and Separate State Programs	Total Funds	Total Funds as a Percent of Total Funds Used
TOTAL EXPENDITURES ON ASSISTANCE	\$22,801,519	\$315,911,481	\$338,713,000	29.8%
BASIC ASSISTANCE	\$22,801,519	\$315,911,481	\$338,713,000	29.8%
CHILD CARE	\$0	\$0	\$0	0.0%
TRANSPORTATION AND SUPPORTIVE SERVICES	\$0	\$0	\$0	0.0%
ASSISTANCE UNDER PRIOR LAW	\$0		\$0	0.0%
TOTAL EXPENDITURES ON NON-ASSISTANCE	\$338,932,475	\$322,914,815	\$661,847,290	58.1%
WORK RELATED ACTIVITIES/ EXPENSES	\$0	\$6,547,114	\$6,547,114	0.6%
CHILD CARE	\$159,143,919	\$45,212,642	\$204,356,561	18.0%
TRANSPORTATION	\$0	\$0	\$0	0.0%
INDIVIDUAL DEVELOPMENT ACCOUNTS	\$0	\$0	\$0	0.0%
REFUNDABLE EITC	\$0	\$109,314,381	\$109,314,381	9.6%
OTHER REFUNDABLE TAX CREDITS	\$0	\$0	\$0	0.0%
NON-RECURRENT SHORT-TERM BENEFITS	\$0	\$64,473,540	\$64,473,540	5.7%
PREVENTION OF OUT OF WEDLOCK PREGNANCIES	\$1,822,947	\$8,527,299	\$10,350,246	0.9%
TWO-PARENT FAMILY FORMATION AND MAINTENANCE	\$0	\$0	\$0	0.0%
ADMINISTRATION	\$0	\$33,251,461	\$33,251,461	2.9%
SYSTEMS	\$0	\$0	\$0	0.0%
NON-ASSISTANCE UNDER PRIOR LAW	\$0		\$0	0.0%
OTHER	\$177,965,609	\$55,588,378	\$233,553,987	20.5%
TOTAL ASSISTANCE AND NON-ASSISTANCE EXPENDITURES	\$361,733,994	\$638,826,296	\$1,000,560,290	87.9%
TRANSFERRED TO CHILD CARE DEVELOPMENT FUND (CCDF)	\$91,874,225		\$91,874,225	8.1%
TRANSFERRED TO SOCIAL SERVICES BLOCK GRANT (SSBG)	\$45,937,112		\$45,937,112	4.0%
TOTAL TRANSFERS	\$137,811,337		\$137,811,337	12.1%
TOTAL FUNDS USED	\$499,545,331	\$638,826,296	\$1,138,371,627	100.0%
UNLIQUIDATED OBLIGATIONS	\$0		\$0	
UNOBLIGATED BALANCE	\$0		\$0	

A.1.: Federal TANF and State MOE Expenditures Summary by ACF-196 Spending Category, FY 2013

Spending Category	Federal Funds	State MOE in TANF and Separate State Programs	All Funds	All Funds Percent of Total Funds Used
TOTAL EXPENDITURES ON ASSISTANCE	\$5,326,260,835	\$4,553,327,580	\$9,879,588,415	31.2%
<i>BASIC ASSISTANCE</i>	\$4,485,279,615	\$4,252,650,107	\$8,737,929,722	27.6%
<i>CHILD CARE</i>	\$72,858,031	\$254,467,575	\$327,325,606	1.0%
<i>TRANSPORTATION AND SUPPORTIVE SERVICES</i>	\$230,242,453	\$46,209,898	\$276,452,351	0.9%
<i>ASSISTANCE UNDER PRIOR LAW</i>	\$537,880,736		\$537,880,736	1.7%
TOTAL EXPENDITURES ON NON-ASSISTANCE	\$8,825,586,896	\$10,441,911,538	\$19,267,498,434	60.9%
<i>WORK RELATED ACTIVITIES/ EXPENSES</i>	\$1,516,804,587	\$516,937,971	\$2,033,742,558	6.4%
<i>CHILD CARE</i>	\$1,037,346,414	\$2,274,529,962	\$3,311,876,376	10.5%
<i>TRANSPORTATION</i>	\$142,506,485	\$31,122,156	\$173,628,641	0.5%
<i>INDIVIDUAL DEVELOPMENT ACCOUNTS</i>	\$691,952	\$169,625	\$861,577	0.0%
<i>REFUNDABLE EITC</i>	\$122,662,721	\$1,728,271,545	\$1,850,934,266	5.8%
<i>OTHER REFUNDABLE TAX CREDITS</i>	\$0	\$543,834,350	\$543,834,350	1.7%
<i>NON-RECURRENT SHORT-TERM BENEFITS</i>	\$279,734,284	\$423,979,582	\$703,713,866	2.2%
<i>PREVENTION OF OUT OF WEDLOCK PREGNANCIES</i>	\$1,088,089,290	\$1,512,532,608	\$2,600,621,898	8.2%
<i>TWO -PARENT FAMILY FORMATION AND MAINTENANCE</i>	\$192,988,042	\$40,781,993	\$233,770,035	0.7%
<i>ADMINISTRATION</i>	\$1,236,738,135	\$838,245,191	\$2,074,983,326	6.6%
<i>SYSTEMS</i>	\$172,419,652	\$43,521,553	\$215,941,205	0.7%
<i>NON-ASSISTANCE UNDER PRIOR LAW</i>	\$887,369,983		\$887,369,983	2.8%
<i>OTHER</i>	\$2,148,235,351	\$2,487,985,002	\$4,636,220,353	14.6%
TOTAL ASSISTANCE AND NON-ASSISTANCE EXPENDITURES	\$14,151,847,731	\$14,995,239,118	\$29,147,086,849	92.1%
TRANSFERRED TO CHILD CARE DEVELOPMENT FUND (CCDF)	\$1,367,276,004		\$1,367,276,004	4.3%
TRANSFERRED TO SOCIAL SERVICES BLOCK GRANT (SSBG)	\$1,134,838,715		\$1,134,838,715	3.6%
TOTAL TRANSFERS	\$2,502,114,719		\$2,502,114,719	7.9%
TOTAL FUNDS USED	\$16,653,962,450	\$14,995,239,118	\$31,649,201,568	100.0%
UNLIQUIDATED OBLIGATIONS	\$1,518,725,644		\$1,518,725,644	
UNOBLIGATED BALANCE	\$1,524,977,538		\$1,524,977,538	

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Appendix E:

TANF ACF-196R Financial Report Part Two: Narrative Section Submitted by Commonwealth of Massachusetts 11/13/2015

Temporary Assistance for Needy Families (TANF) ACF - 196R Financial Report
Part 2: Narrative Section

State MASSACHUSETTS	Fiscal Year 2015	Report Quarter Ending 12/31/2014
Expenditure Categories	Descriptions of Expenditures	Methodology Used to Estimate Federal Funding and State MOE Expenditures
6. Basic Assistance		
6.a. Basic Assistance (excluding Relative Foster Care Maintenance Payments and Adoption and Guardianship Subsidies)		
6.b. Relative Foster Care Maintenance Payments and Adoption and Guardianship Subsidies		
7. Assistance Authorized Solely Under Prior Law		
7.a. Foster Care Payments		
7.b. Juvenile Justice Payments		
7.c. Emergency Assistance Authorized Solely Under Prior Law		
8. Non-Assistance Authorized Solely Under Prior Law		
8.a. Child Welfare or Foster Care Services		
8.b. Juvenile Justice Services		
8.c. Emergency Services Authorized Solely Under Prior Law		
9. Work, Education, and Training Activities		
9.a. Subsidized Employment		
9.b. Education and Training		
9.c. Additional Work Activities		
10. Work Supports		
11. Early Care and Education		
11.a. Child Care (Assistance and Non-Assistance)		
11.b. Pre-Kindergarten/Head Start		
12. Financial Education and Asset Development		
13. Refundable Earned Income Tax Credits		
14. Non-EITC Refundable State Tax Credits		
15. Non-Recurrent Short Term Benefits		
16. Supportive Services		
17. Services for Children and Youth		
18. Prevention of Out-of-Wedlock Pregnancies		
19. Fatherhood and Two-Parent Family Formation and Maintenance Programs		
20. Child Welfare Services		
20.a. Family Support / Family Preservation / Reunification Services		
20.b. Adoption Services		

20.c. Additional Child Welfare Services		
21. Home Visiting Programs		
22. Program Management		
22.a. Administrative Costs		
22.b. Assessment/Service Provision		
22.c. Systems		
23. Other	<p>UMass Scholarships \$80,073,422 The University of Massachusetts provides needs-based financial assistance to Massachusetts students enrolled in and pursuing a program of higher education at one of the UMASS locations: Boston, Lowell, Worcester, Amherst, or Dartmouth. The scholarship program covers the cost of tuition for courses as well as the standard costs associated with attending school. Scholarships serve a dual purpose under the TANF goals 3 & 4: 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 encourage the formation and maintenance of two-parent families. Scholarships not only benefit the individuals in receipt of the scholarships, but they also benefit the future generations who aspire to pursue higher education. The presence and availability of scholarships provide incentives for the middle and high school students to succeed in school and avoid out-of-wedlock pregnancy.</p> <p>Scholarship Reserve \$80,242,929 The Scholarship Reserve provides financial assistance to Massachusetts students enrolled in and pursuing a program of higher education in any approved public or independent college, university, school of nursing, or any other approved institution furnishing a program of higher education. The scholarship program covers a portion of the total cost of tuition and other costs associated with attending the institution. These costs include all related expenses such as room and board, health insurance, travel expenses, and personal expenses. The expenditures documented in this claim have been reasonably calculated to include only the cost of attending courses and pursuing higher educational attainment.</p>	
<p>THIS IS TO CERTIFY THAT THE INFORMATION REPORTED ON ALL PARTS OF THIS FORM IS ACCURATE AND TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF.</p>		
Signature, Approving State Official	State Official Name	State Official Title
	Easton E. Hill	Assistant Director - Federal Revenue
State Official Agency	MASSACHUSETTS	
Signature Date:	Date Submitted:	
11/13/2015	11/13/2015	

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Appendix F:

Massachusetts Workforce Innovation and Opportunity Act (WIOA) State Plan: List of Required Career One-Stop Partners

Massachusetts Workforce Innovation and Opportunity Act (WIOA) State Plan: List of Required Career One-Stop Partners

In addition to the core programs, for individuals with multiple needs to access the services, the following partner programs are required to provide access through the One-Stops partner, unless the Governor takes special action to make TANF an optional One-Stop partner:

- Career and Technical Education (Perkins);
- Community Services Block Grant;
- Indian and Native American Programs;
- HUD Employment and Training Programs;
- Job Corps;
- Local Veteran's Employment Representatives and Disabled Veteran's Outreach Program;
- National Farmworker Jobs Program;
- Senior Community Service Employment Program;
- Temporary Assistance for Needy Families (TANF);
- Trade Adjustment Assistance Programs;
- Unemployment Compensation Programs; and
- YouthBuild.¹⁴⁵

¹⁴⁵ See WIOA State Plan at 25, fn 7.