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Welfare Reform: Work Trigger Time Limits, Exemptions and Sanctions under TANF

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Vee Burke and Melinda Gish
Domestic Social Policy Division

ABSTRACT

This report provides an analysis and a state-by-state table showing how the 54 jurisdictions with programs of Temporary Assistance for Needy Families (TANF) — the 50 states, the District of Columbia, Guam, Puerto Rico and the Virgin Islands — are using their discretion to decide when adult recipients must work, who is exempt from work, and how to penalize refusal to work. It shows that many states are requiring work soon after enrollment and that many have adopted much tougher sanctions than were allowed under the program of Aid to Families with Dependent Children (AFDC), which was replaced by TANF (P.L. 104-193). The report will be updated whenever significant new information becomes available.

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Summary

The 1996 welfare law (P.L. 104-193) requires states to engage in work activities a minimum percentage of adults to whom they give benefits from the block grant for Temporary Assistance for Needy Families (TANF). Under TANF, states decide whom to exempt from work rules and what penalties to impose for not complying with the rules. However, if states fail to penalize adult recipients who refuse to engage in required work, they are subject to loss of some TANF funds. This report provides a summary analysis and a state-by-state table showing how the 54 TANF jurisdictions (all referred to as “states”) are using their discretion to decide when adults must work, who is exempt from work, and how to penalize refusal to work. The table shows that many states are stressing “work first” policies — requiring work soon after enrollment and requiring work by mothers of infants — and that many have adopted much tougher sanctions than were allowed under previous law.

Under TANF states must require adult recipients to work, as defined by the state, in order to retain eligibility after a maximum of 24 months of benefits and may require work sooner. This rule is known as the work trigger time limit. Nineteen states have adopted a shorter limit. Thirteen states say that they require immediate work (of these states, some identify job search as the required work activity). Eight states do not specify a work trigger time limit, but most of these states cut off benefits altogether — without regard to work status — after 21-24 months.

In their TANF programs, 20 states require work activity of single parents of babies not yet 1 year old, and 26 require work upon the child’s first birthday. A majority of states exempt adults who are disabled or incapacitated; 26 exempt the aged; and 16 states exempt (or defer) pregnant woman, usually in the last trimester. Some states give exemptions to groups not mentioned in pre-TANF law, such as victims of domestic violence and caretaker relatives without legal obligation to support the child.

TANF gives states explicit authority to end benefits for the family if the parent fails to engage in required work activity. Previously the children’s share of benefits could *not* be ended. One-third of the states have adopted the penalty of a 100% benefit cut for a first violation (and some others for repeat violations). Most of these states resume payment of benefits upon compliance, but eight states specify a minimum penalty period. Another 22 states remove the adult’s share of the grant (the penalty prescribed by pre-TANF law) for a first violation of work rules. If a penalized recipient comes into compliance with work rules but later commits another violation, the sanction is increased in size and/or duration. Ultimately, eight states end benefits for the family permanently and make the repeat offender ineligible for TANF for life. Using new authority in the 1996 welfare law, some states reinforce their TANF penalties by reducing/ending food stamps. It is estimated that almost 23% of TANF cases nationwide include no adult recipient and hence are not subject to TANF work rules or time limits.

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Welfare Reform: Work Trigger Time Limits, Exemptions and Sanctions under TANF

The 1996 welfare law (P.L. 104-193) requires states to engage in work activities a minimum percentage of adults to whom they give benefits from the block grant for Temporary Assistance for Needy Families (TANF).¹ It authorizes states to decide how to achieve the required participation rate: whom to exempt from work rules, if anyone; what penalties to impose for failure to comply with work rules; and what activities and support services to include in their work programs. TANF contrasts with the predecessor program of Aid to Families with Dependent Children (AFDC), which required states to exempt certain recipients from required participation in its education, work, and training program. Further, AFDC law did not allow states to impose penalties upon the child(ren) for a parent's refusal to work or to engage in work activities.

In their TANF programs, states have adopted varying combinations of tougher work sanctions, "Work First" policies, financial rewards for work, and diversion of applicants from enrollment. Welfare-to-work efforts have new urgency because the law restricts federally funded TANF aid for an adult to 60 months (lifetime limit), and many states impose shorter benefit cutoff limits.

TANF programs exist in the 50 states, the District of Columbia, Guam, Puerto Rico, and the Virgin Islands (in this report these 54 jurisdictions are all referred to as "states"). In addition, more than 60 Indian tribes and Alaska native villages operate their own tribal TANF programs, under terms of some 19 tribal TANF plans. For tribal programs, the Secretary of the U.S. Department of Health and Human Services is directed to establish time limits, work rules, and penalties with the participation of the tribe. This report provides a state-by-state table showing decisions in the 54 states about four TANF elements: (1) work trigger time limits — how long adult recipients

¹ The statutory rates for all families, which began at 25% in FY1997, reached 35% in FY1999 and ultimately (FY2002) are to climb to 50%. For two-parent families, the rates are higher; they began at 75% and rose to 90% in FY1999. (For this purpose a family with a disabled second parent is not treated as a two-parent family.) However, the law provides that the Department of Health and Human Services (DHHS) must reduce the rate otherwise required in a state where the caseload falls below the FY1995 level — unless the caseload reductions were required by federal law or result from changes in state eligibility criteria. Essentially, DHHS must reduce a state's minimum participation rate for a given fiscal year by one percentage point for each percentage point by which the average monthly caseload in the preceding fiscal year falls short of the FY1995 base level. Thus, actual state minimum participation rates for FY1999 will depend upon FY1998 caseload data. Average FY1998 monthly caseloads of more than half the states were at least 35% smaller than in FY1995, a decline sufficient to reduce their all-family minimum participation rate to zero. (See CRS Report 98-629)

(parents and other caretakers) may receive TANF benefits before being required to engage in work, (2) work exemptions, if any, for single parents with children below a specified age, (3) other exemptions, and (4) penalties for failure to comply with work rules. The table does not cover exemption/sanction rules for *minor* parents. This is because federal law establishes policy for them. Unmarried minor parents (under 18 years old) who lack a high school diploma are ineligible for TANF unless, once their youngest child is 12 weeks old, they return to school or enter an approved alternative educational or training program. They also must live in an adult-supervised arrangement; this rule usually requires them to live with their parent(s).

The table is based on TANF plans, state laws, state regulations, conversations with state welfare officials, and some pre-TANF waivers from AFDC law, as of early April 1999. The table necessarily compresses information and seeks to do so in a consistent manner, but for some states available information is less detailed and precise than for others. Further, practices may vary by county in some states.

Based on the most recent available *national* data (FY1997) it is estimated that almost 23% of TANF cases nationwide include no adult recipient and hence are not subject to TANF work rules (or to TANF time limits). These child-only TANF units are needy children in the care of an adult who is ineligible (as a non-needy parent or other relative, an illegal immigrant, a recipient of Supplemental Security Income,² a parent who is being sanctioned for failure to comply with program rules, or who is ineligible on some other grounds). Further, some child-only cases represent children living with caretaker relatives who are *eligible*, but who do not receive a grant for their own needs because acceptance of TANF would subject them to TANF's work rules and time limits.³ In some states child-only cases now are estimated to comprise more than 40% of all TANF cases: for example, 44% in Florida, March 1999; and 47% in Alabama, August, 1998. The rising *proportion* of child-only cases reflects the very sharp decline in the number of parent-child TANF cases as well as policy changes that are promoting child-only cases.

Work Trigger Time Limits

Under TANF, states must require adult recipients to engage in "work," *as defined by the state*, after receiving aid for 24 months, or sooner if then judged job-ready. This is the federal work trigger time limit, and it is different from the federally funded *benefit cutoff* limit (60 months). In many states the TANF recipient who goes

² AFDC law required that family members who received SSI be excluded from the AFDC unit (and that none of their income be treated as available to the AFDC child). Under TANF, some states continue exclusion of SSI caretakers from the assistance unit.

³ A 1998 Florida state law (H.B. 1019) created a relative caregiver program, under which the state pays, *on behalf of the child only*, an amount above the standard TANF child-only benefit schedule. The law sets maximum payments under this program at 82% of the statewide average rate paid to foster parents (Florida's rates for a child in foster care can be double or triple those for a child-only TANF grantee). For this program, a relative must have temporary legal custody of the child, or the child must be placed in the relative's home by court order. In March, 1999, 26% of Florida's TANF cases were classified as child-only caretaker relative cases.

to work remains eligible for a reduced TANF benefit until the state's absolute benefit cutoff limit is reached. This is especially likely if the work is part time and the wage rate is relatively low.

Table 1 shows that 27 states have adopted the federal maximum of 24 months as their work trigger time limit, 19 states have chosen a shorter limit, and the remaining states have not specified a limit. Thirteen say that they require immediate work (Arizona, California, Delaware, District of Columbia, Florida, Idaho, New Hampshire, North Carolina, Tennessee, Utah, Washington, Wisconsin, and Wyoming). Some of these states identify job search as the immediate work activity. Three states require work after a maximum of 52-60 days (Guam, Massachusetts, and Rhode Island); Virginia sets 90 days as the limit; Minnesota, 6 months (but counties may alter this). Vermont allows 15 months for two-parent unemployed parents, but 30 months⁴ for single-parent families (and only 5 months for families who have not lived in the state for at least 12 months). Some states require applicants to conduct job search *before* TANF benefits are authorized.

Eight states do not specify a work trigger time limit (Arkansas, Connecticut, Iowa, Louisiana, Maryland, Oregon, Texas, and the Virgin Islands). However, Arkansas, Connecticut, Louisiana, and Oregon cut off benefits after 21-24 months. Texas allows 12, 14, or 36 months of benefits, depending on recipients' work history and education.

Some states specify that after a limited period, TANF recipients will receive aid only if they have a paid job or work in exchange for their benefits. For instance, Pennsylvania law provides that benefits will end after 24 months for a jobless person unless she participates in work experience, community service, or workfare for an average of at least 20 hours per week. California allows aid beyond 18 months only if the county determines that a job is unavailable and the recipient participates in community services. Delaware regulations provide for "pay-after-performance" work experience after 24 months of benefits, with hours determined by dividing the benefits by the minimum wage, plus up to 10 hours of weekly job search.

Work Activities Countable for State Participation Rates.

Although states define work for the work trigger time limit, TANF law defines it for purposes of determining whether states achieve minimum participation rates. For counting actual work participation, the law recognizes these activities as constituting "work" for adults:

"Priority" activities—

- employment (unsubsidized employment, subsidized private or public employment);
- work experience;
- on-the-job training;
- job search and job readiness assistance, for 6 weeks (12 weeks under certain conditions);

⁴ Vermont is continuing a 30-month work trigger limit under a pre-TANF waiver.

- community service programs;
- vocational educational training, for 12 months (*Note*: no more than 30% of persons counted as engaged in work may consist of persons in vocational educational training);
- providing child care services to a participant in community service;

Non-priority activities—

- job skills training directly related to employment;
- (high school dropout only) education directly related to employment; and
- (high school dropout only) satisfactory attendance at secondary school.

Generally, a TANF adult recipient must spend at least 20 hours weekly in one of the priority activities above (30 hours if in a two-parent family) to be counted as working.⁵ However, a special provision of law allows a young adult, 18 or 19 years old to satisfy the work requirement by satisfactory secondary school attendance (hours not specified) or by participating in education directly related to employment for an average of 20 hours weekly. (As noted before, unmarried minor parents without a high school diploma are ineligible for TANF unless they attend school.)

States are free to use TANF funds (or their own funds) for work-enabling activities not listed in the law (such as a second year of vocational educational training, longer job search, basic skills training, a college course of study, substance abuse treatment or mental health counseling), but they may not count participation in these activities in calculating their work participation rates.

Exemption for Infant

AFDC law prohibited states from requiring participation in the predecessor training program of Job Opportunities and Basic Skills training (JOBS) by a single parent with a child below age 3, but gave states the option to lower this threshold to age one (only 10 states did so). In contrast, under TANF, 46 states have adopted a threshold of age one *or lower* (20 states require work before the child's first birthday, and 26 when the child turns one).

As **Table 1** shows, the following 20 states require work activity of single TANF parents before the child's first birthday:

- At age 3 months/12-13 weeks/90 days — 12 states. Arkansas, Delaware, Florida, Iowa, Michigan, Nebraska, New Jersey, Oklahoma, Oregon, South Dakota, Wisconsin, and Wyoming
- At age 4 months — two states. North Dakota and Tennessee
- At age 6 months — six states. California, Hawaii, Indiana (dropping to 12 weeks in December 1998), Vermont, Virgin Islands, and West Virginia (for a

⁵ To be counted as a work participant, a single parent aged 20 or more (unless she has a child under age 6) must engage in a work activity for an average of at least 25 hours weekly in FY1999 and 30 hours in FY2000, with at least 20 hours in "priority" activities. The weekly work requirement for single parents of a preschool child is 20 hours. For two-parent families, required weekly work hours must average 35 (with 30 hours in priority activities).

child born before TANF enrollment). In the case of West Virginia, the mother is exempt until the first child born to her *after* TANF enrollment reaches age 2.

The TANF law allows a state that exempts single parents/caretakers of a child under 12 months old from required work activities to disregard these persons in determining work participation rates, but only for a lifetime total of 12 months per parent. Some states specify that they will exempt a given parent only for a lifetime total of 12 months. One of these states, New York, restricts the exemption for any one child to 3 months, but permits counties to extend it to 12 months. Some states disallow the work exemption for parents of infants unless the baby was born before the family enrolled in TANF (or within 10 months after initial enrollment); these states include Connecticut, Indiana, and Texas.

The 26 states that require the parent to work when the child reaches age 1 are: Alabama, Alaska, Arizona, Connecticut, District of Columbia, Georgia (sooner if adequate child care is available), Guam, Illinois, Kansas, Kentucky, Louisiana, Maine, Maryland, Minnesota, Mississippi, Missouri, Nevada, New Mexico, New York, North Carolina, Ohio (sooner at county option), Pennsylvania, Puerto Rico, Rhode Island, South Carolina, and Washington (dropping to age 3 months after June 30, 1999).

Four states exempt mothers with a child older than 1: Virginia, under 18 months; Massachusetts, under age 2; New Hampshire, under age 3; and Texas, under age 4. Policies in the remaining 4 states: Colorado, county option; Idaho, no automatic exemption; and Montana and Utah, no exemption specified.

Federal law prohibits a state from penalizing the single caretaker of a child under age 6 for work refusal if needed child care is not available, and two states, Alaska and Pennsylvania, explicitly exempt caretakers of preschool children from work in the absence of needed child care.

Other Exemptions

Many state TANF programs have adopted some work exemption policies of the JOBS program. AFDC law forbids states to require participation in JOBS by certain persons, including persons who were: ill, incapacitated or of advanced age; needed in the home because of illness or incapacity of household member; pregnant; or living where JOBS was not available. Examples of JOBS exemptions used in state TANF programs:

Persons who are ill, incapacitated, or of advanced age — 30 states exempt adults who are disabled or incapacitated; four, those with short-term illness or injury; and 26, the aged (most states specify age 60; three, age 65).

Persons needed in the home to care for a household member — 28 states exempt those needed to care for a household member who is disabled, aged, ill.

Pregnant persons — 16 states exempt (or defer) pregnant women, usually in the last trimester, but New York allows the exemption only for the last month. Oregon

provides that those in the last trimester cannot be required to work more than 10 hours weekly.

Persons who reside in a remote area — two states exempt persons who live in remote areas.

Some states exempt groups not mentioned in previous (JOBS) law. For instance, under certain circumstances, 13 states exempt victims of domestic violence from TANF work activities, and four states exempt caretaker relatives who have no legal obligation to support the child. Other exemptions: four states — unemployable persons, or those with significant barriers to work; two states — VISTA volunteers; one state each — homeless persons, persons undergoing drug abuse treatment, persons in crisis, and persons unable to participate because of individual circumstances.

Sanctions

TANF law requires states to penalize families if a recipient refuses to engage in required work and does not have good cause, according to optional standards of the state, for the refusal. The state is directed to reduce the family benefit by at least a “pro rata” share or *to drop the family from cash aid*. The law stipulates that the penalty cannot be imposed on a single parent with a child under age 6 if she/he demonstrates an inability to obtain needed child care for a specified reason. (New York law forbids penalizing a single parent for failure to comply with work rules if child care cannot be found for a child under age 13.)

TANF law explicitly permits a state to reduce a family’s benefit, by an amount the state considers “appropriate,” if a family member fails without good cause to comply with an individual responsibility plan (IRP) that he/she has signed. Most state TANF plans include use of IRPs that establish an employment goal, set forth obligations of the recipient and describe services to be provided by the state. Illustrative recipient obligations include school attendance for children, immunization of children, attendance at parenting or money management classes, and needed substance abuse treatment.

If a state fails to reduce or end TANF benefits for refusal to work, the law requires that the state itself be penalized by loss of funds (between 1% and 5% of the state’s basic TANF grant). However, a state must be given an opportunity to adopt a corrective action plan that will lift the penalty; it also may be excused from the penalty on grounds of reasonable cause. Reasonable cause is not defined in the law. In its November 20, 1997 proposed TANF regulations, the Department of Health and Human Services (DHHS) said it would generally limit reasonable cause penalty exemptions to natural disasters, formally issued federal guidance providing incorrect information, and “isolated, non-recurring problems.” However, it said that if a state failed to meet work participation rates because of giving waivers from TANF rules to victims of domestic violence, it might receive a reasonable cause exemption from the penalty, provided the waivers met certain conditions. At the same time, DHHS stressed that it would disallow a penalty exemption if it detected a “significant pattern of diversion of families to separate state programs that achieved the effect of avoiding the work participation rates.”

Under AFDC, if a recipient failed to undertake required work, education, or training, or refused a bona fide job offer, federal law spelled out the penalties. States were required to remove the recalcitrant adult from the benefit unit until compliance and to pay the child's benefits to a third party. For repeat offenses after reinstatement, minimum penalty periods applied — 3 and 6 months for second and subsequent violations, respectively. The law did not permit states to penalize the adult by ending the benefits of the child.

First Violation—100% Benefit Cut. As **Table 1** shows, 18 states have adopted the penalty of loss of the full family benefit for a first violation. Until compliance (or after a minimum penalty period), families in these states lose 100% of TANF benefits for a first violation: Alaska (for refusing to accept or quitting suitable employment), Arkansas, Florida, Guam, Idaho, Kansas, Louisiana (for refusal to accept full-time employment), Maryland, Michigan, Mississippi, Nebraska, Ohio, Oklahoma, South Carolina, South Dakota (for refusal of work or extra work hours), Tennessee, Virginia, and Wyoming. Most of these states resume payment of benefits upon compliance, but eight states specify a minimum penalty period: Guam and Louisiana, 3 months; Mississippi, 2 months; Alaska, Idaho, Nebraska, and Ohio, 1 month; and South Carolina, 30 days.

First Violation—Partial Benefit Cut. For a first violation of work rules, 22 states remove the adult's share of the TANF grant: Alaska (for refusal to participate in assigned activities),⁶ California, District of Columbia, Georgia, Hawaii, Indiana, Iowa, Kentucky, Maine, Massachusetts, Missouri, Montana, New Hampshire, New Jersey, New York, North Dakota, Pennsylvania, Puerto Rico, Rhode Island, Vermont (if enrolled for less than 28 months), Virgin Islands, and Washington. Eleven of these states lift the sanction upon compliance, but the rest apply the penalty for minimum periods ranging from one to 3 months. If loss of the adult share of the benefit does not bring compliance within a specified time, New Hampshire, New Jersey, and North Dakota increase the sanction to a 100% benefit cut.

Ten states penalize a first violation of work rules by making a fractional reduction in the full family benefit: Illinois, 50% benefit cut; Delaware, Nevada, and West Virginia, 33%; Alabama, Arizona, Colorado, New Mexico, 25%; Connecticut, 20%; and Minnesota, 10%. Five states impose a monthly flat dollar reduction for a first violation: North Carolina and Oregon, \$50 cut; Texas, \$78 (\$125 for a two-parent case); Utah, \$100 (parent's fixed portion); and Wisconsin, \$5.15 per hour of missed work activity. Most of these states impose the penalty for at least 1 to 3 months, and some increase the penalty to a 100% benefit cut for continued noncompliance.

Repeat Violations. If a penalized family comes into compliance with work rules but later commits another violation, the sanction is increased in size and/or duration. For a repeat violation, some states increase the penalty to a 100% benefit cut for a minimum period. Ultimately, eight states end benefits for the family *permanently* and make the repeat offender ineligible for TANF for life: Delaware, Georgia, Guam,

⁶ Alaska, as shown in the preceding paragraph, imposes a full benefit cut for refusing to accept or quitting suitable employment.

Idaho, Mississippi, Nevada, Pennsylvania, and Wisconsin. Georgia policy requires that the grantee-relative in a family that is sanctioned a second time within 24 months be permanently barred from receiving TANF cash aid for any children. Under Georgia rules, the children of the punished caretaker cannot receive TANF cash benefits unless they move into the home of another caretaker. This also may be the effect of the ultimate permanent 100% benefit cut in the other seven states.⁷

Vermont, under a pre-TANF waiver, has adopted an unusual maximum penalty. For violations committed when the family is within 2 months of the work trigger limit, Vermont replaces cash aid with vendor payments for major expenses and requires the parent to attend meetings with the caseworker to receive any balance due.

Interaction with Food Stamps. The 1996 welfare law provides for reinforcement of TANF sanctions by food stamps. Under the law, states may reduce food stamp benefits by up to 25% for households whose TANF benefits are reduced because of noncompliance with program rules, and states are forbidden to increase food stamps to offset some of the cash penalty. Further, those disqualified for noncompliance with TANF rules may also be disqualified for food stamps and Medicaid. Florida, Guam, Michigan, Montana, the Virgin Islands, and Wyoming supplement TANF penalties by also reducing or ending food stamps.⁸ Montana and the Virgin Islands end Medicaid benefits for an adult who does not comply with TANF work rules.

Sanction Procedures. Under TANF, states decide sanction procedures as well as amounts. Before actually imposing a sanction, states usually send warning letters. Some seek to determine whether there was a good cause for the recipient's violation, and some have a "conciliation" procedure to resolve disputes about participation in required work activity. Under AFDC, the law specified "good cause" reasons for failure to participate in required education, work, and training activities. In addition, federal regulations required states to establish a conciliation procedure to resolve disputes about a recipient's participation in work-related activities and to offer a hearing to a recipient who disputed the sanction.

State Use of Sanctions. As noted, many states now punish failure to comply with work rules or to abide by a personal responsibility agreement by suspending the full family benefit, but nationwide sanction data are unavailable. Available state reports indicate a wide spread in actual use of partial or full TANF sanctions. However, sanction rate data may not provide a complete picture of a state's use of sanctions, and it is difficult to make comparisons across states. For example, in states with more severe penalties (i.e., a lifetime ban), a non-compliant family may be encouraged to close its case rather than face sanctioning. Moreover, some states

⁷ Presumably, some states might provide noncash aid to children living with a parent whom they had permanently barred from TANF cash eligibility because of noncompliance with work rules.

⁸ The Montana Senate, on February 22, 1999, approved a bill (SB 353) that would rescind the food stamp benefit cut and the loss of adult Medicaid for persons under TANF work sanctions.

sanction only as a very last resort, alternatively keeping cases open through a multi-stage process. Thus, the data that follow should be read with limitations in mind.

Case Closures and Full Benefit Suspensions. The share of case closures attributed to work sanctions in Maryland increased during the first 18 months of TANF (October 1996-March 1998), from 3.6% in the first 6 months of reform to 8.8% in the next 6 months, and to 9.5% in the last 6 months, according to sample surveys. During the entire period, full family sanctions for non-cooperation with work rules accounted for 7.3% of all case closures. In South Carolina, which began TANF in spring 1997, but had a pre-TANF waiver permitting full-family sanctions for failure to comply with individual self-sufficiency plans (ISSP), sample surveys found that 25% of case closures in FY1997 were due to sanctions; and in December 1998, 18% of all TANF closings in the state (415 out of 2,270) were attributed to failure to comply with ISSPs. In Oklahoma, failure or refusal to meet TANF work requirements accounted for one-tenth of all Oklahoma case closures (3,573 out of 34,300) during FY 1998. In January 1999, the proportion of Oklahoma case closures attributed to TANF work rule refusal/failure rose to 23% (535 out of 2,332). In FY1997, before the state's TANF work component (VIEW) became statewide, Virginia suspended benefits of 1,237 families for at least 1 month because of failure to participate in VIEW. According to a late 1997 survey undertaken for the Tennessee Department of Human Services, many of the 696 families whose cases were closed after January 1997 for refusal to sign a personal responsibility plan did not understand the consequences. Only 58% (out of 331 contacted families) said they understood that they must sign the plan.

Benefit Reductions. In March 1999, Florida suspended parental benefits of 889 families (roughly 2.6% of cases subject to work rules) 490 for work violations and 399 for other reasons; the children's benefits continued, as these became "child-only" TANF cases. Missouri reports that in January 1999, 3,767 families (roughly 7% of the caseload) received a benefit cut for not looking for work or accepting a job. In February, 1999, 216 Nevada families were under TANF sanction for work violations (5.8% of the families required to work) and 44 for violating personal responsibility plans. Under TANF sanction in February 1999 were 837 Connecticut families (4.2% of those required to work) and, in January, 599 Oregon families (3.4% of the total caseload). ABT Associates, Inc., found that 49% of Delaware families were penalized in the first TANF year with partial benefit loss (33% benefit cut for work noncompliance and \$50 monthly cut for disobeying parental responsibility rules). An examination by the Manpower Demonstration Research Corporation of the Portland, Oregon JOBS program run between early 1993 and mid-1996 found that AFDC grant penalties were imposed on 21% of the sample studied and that the average length of sanction was 5.4 months, but that 8% were penalized for more than 12 months.

Table 1. Temporary Assistance for Needy Families (TANF) Work Trigger Time Limits, Exemptions, and Sanctions
(Applicable to Adult Recipients — Parents and other Caretakers)^a

State	Maximum months of benefits without work	Exemptions to care for a young child	Other work exemptions	Sanction for failure to comply with work rules
Alabama	24 months	Under age 1.	Exempt: disabled parents. (Non-parental caretakers are ineligible for TANF.) Temporarily excused (deferred is Alabama's term) are parents who are ill or injured or who have a similar short-term difficulty.	Family benefit is reduced 25% for 3 months and ended (indefinitely) in 4th month, if still out of compliance. For violating work rule after reentry, benefit is cut 25% for 3 months and 100% in 4th month (for minimum period of 6 months).
Alaska	24 months	Under age 1.	Exempt: persons who are needed in the home to care for a disabled person; those unable to perform gainful activity for medical reasons; caretakers of child under age 6 without child care; persons for whom the department does not agree to pay needed transportation costs; and persons who show that loss of benefits (as a result of work sanction) would threaten family health and safety.	For refusal of, or voluntary separation from, suitable employment, benefit is cut 100% for progressively longer periods: first offense, 1 month; second offense, 6 months; subsequent offenses, 12 months. For refusal to complete their family self-sufficiency plan, or for first refusal to participate in assigned work activities, adult share of benefit is ended until compliance. For repeat violations, a minimum penalty period is imposed: 6 months for second violation and 12 months for subsequent ones.
Arizona	Immediate job search required	Under age 1.	Temporarily deferred: persons needed to care for disabled person; victims of domestic violence whose participation in work might threaten safety of them or their children.	Progressive sanctions — Benefit is cut 25% for first month of noncompliance; 50% for the second month; and 100% for the third and subsequent months of noncompliance.

State	Maximum months of benefits without work	Exemptions to care for a young child	Other work exemptions	Sanction for failure to comply with work rules
Arkansas	Not specified in plan. (Note: state has 24-month benefit cutoff limit.)	Under 3 months (between 3 and 12 months if child care is not available).	Temporarily deferred: persons unable to work because of a physical or mental disability, the effects of domestic violence, or extraordinary circumstances; persons who are in the 3rd trimester of pregnancy; above age 60; or caring for an incapacitated family member.	Case is closed until compliance. However, in extraordinary circumstances, and for child(ren)'s best interest, county may instead cut family benefit by 25%. For a repeat violation, minimum sanction period is 3 months.
California	Immediate	Under 6 months (county, on case-by-case basis, may shorten this to 12 weeks or lengthen it to 1 year). For adopted child, exemption ends 6 months after adoption date. Exemptions for birth or adoption of subsequent children are limited to 12 weeks, which may be extended to 6 months by the county.	Exempt: disabled persons; persons of advanced age; those needed to care for an ill or incapacitated household member; and pregnant women (if the pregnancy is verified to impair work or welfare-to-work activities); and nonparent caretaker relatives caring for a child who is the ward of a court or at risk of foster care placement (if county determines that caretaker responsibilities exceed normal parenting responsibilities and impair the person's ability to work regularly or participate in welfare-to-work activities).	For first noncompliance, adult share of benefit is ended until compliance. For repeat violations, a minimum penalty period is imposed: 3 months for second violation, 6 months for subsequent ones. For a two-parent family eligible on grounds of a parent's unemployment, the penalty is removal of both parents from the assistance unit unless the second parent is exempt.

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State	Maximum months of benefits without work	Exemptions to care for a young child	Other work exemptions	Sanction for failure to comply with work rules
Colorado	24 months	County option.	None specified. (However, county departments will determine if good cause for failure to participate in work activities exists by means of an assessment before the 24-month limit. Assessments shall include such factors as: availability of childcare, jobs or work sites, and transportation.)	Progressive sanctions — first noncompliance: reduction of family’s benefit by 25% for 1-3 months; second violation (or continued noncompliance after 3 months): 50% benefit cut for 1-3 months; subsequent violations or continued noncompliance: 100% benefit cut for 3-6 months. (County decides length of sanction and may impose 100% benefit cut for any instance of noncompliance.)
Connecticut	Not specified in plan. (<i>Note:</i> state has 21-month benefit cutoff limit.)	Under age 1. Exemption not applicable if baby was born to mother already receiving TANF aid.	Exempt: persons who are incapacitated; at least 60 years old; needed at home because of the incapacity of a household member; pregnant or post-partum women whose physicians indicate that they are unable to work; and persons determined “unemployable” under state policies.	Progressive sanctions — first instance of noncompliance: 20% benefit cut for 3 months; second violation (or continued noncompliance): 35% cut for 6 months; third and subsequent violations (or continued noncompliance): 100% benefit cut for 3 months.
Delaware	Immediate	Under 13 weeks.	Exempt: persons determined unemployable by a health care professional.	Progressive sanctions — first instance of noncompliance: one-third benefit reduction until compliance or for 2 months; second violation or continued noncompliance: two-thirds reduction until compliance or for 2 months; third violation or continued noncompliance: 100% benefit cut (permanent).
District of Columbia	Immediate (after assessment)	Under age 1.	Exempt: Persons at least 60 years old and the incapacitated. (Note: D.C. has a separate program (POWER) for incapacitated parents. POWER participants must engage in “self-sufficiency” activities decided by the mayor.	For first violation, adult share of benefit is ended for 1 month or, if later, until compliance. For repeat violations, a minimum penalty period applies: 3 months for second offense, 6 months for subsequent ones.

State	Maximum months of benefits without work	Exemptions to care for a young child	Other work exemptions	Sanction for failure to comply with work rules
Florida	Immediate	Under 3 months. However, state may require parent to attend parenting classes or other activities.	Persons who receive benefits under the SSI program or the Social Security Disability Insurance program and caretaker relatives who choose not to be included in the TANF recipient unit (child-only cases).	Progressive sanctions — first instance of noncompliance: 100% benefit cut until compliance (and food stamp benefits shall not be increased); second violation: 100% benefit cut (and food stamp disqualification) until adult has complied with rule for 30 days (except that children under age 16 may receive benefits paid to a “protective” third party). Upon compliance, benefits are reinstated to the date of compliance. Third violation: 100% benefit cut (and food stamp disqualification) for 3 months (except that protective payments may be made for children under age 16). After the 3-month penalty period, the adult must comply with work rules for at least 10 days before reinstatement of benefits.
Georgia	24 months	Under age 1 (unless adequate child care is available).	None specified.	For first violation of work requirement or failure to comply with personal responsibility plan, 25% benefit cut for 1 month. For continued noncompliance after 3 months, or second violation, case is closed. (If second sanction occurs within 24 months of first, the grantee-relative is permanently barred from TANF.)
Guam	60 days	Under age 1.	Exempt: persons at least age 60; those caring for a dependent adult who is aged or disabled.	100% benefit cut for progressively longer times: first violation, 3 months; second, 6 months; third, eligibility ended permanently. Food stamp benefits are ended, along with TANF. (Effective in October 1998, as required by court action, and pursuant to P.L. 104-193, it is planned to restrict the food stamp “compatible disqualification” to the adult who heads both the TANF family and food stamp household.

State	Maximum months of benefits without work	Exemptions to care for a young child	Other work exemptions	Sanction for failure to comply with work rules
Hawaii	24 months	Under 6 months.	Exempt: persons who are ill, incapacitated, or disabled for at least 30 days; at least age 60; certified by a physician to be needed in the home to care for an ill, incapacitated, or disabled household member; and full time VISTA volunteers.	For first violation, adult share of benefit is ended until compliance. For repeat violations, a minimum penalty period applies: 3 months for second offense and 6 months for subsequent ones.
Idaho	Immediate (with few exceptions)	No automatic exemptions.	No automatic exemptions.	100% benefit cut for progressively longer times: first violation, 1 month or until compliance, if later; second violation, 3 months or until compliance; third violation, permanent loss of benefit.
Illinois	24 months	Under age 1 (for single parents).	Exempt: persons at least age 60.	For first and second violations: 50% benefit cut, increased to 100% if fail to comply after 3 months of reduced grant. For subsequent violations, 100% benefit cut for 3 months or until compliance.

State	Maximum months of benefits without work	Exemptions to care for a young child	Other work exemptions	Sanction for failure to comply with work rules
Indiana	24 months	Phased schedule: effective June 1997, under age 1; June 1998, under 6 months; December 1998, under 12 weeks. Schedule not applicable for baby born to mother already on TANF. For these “family cap” babies, exemption now ends at age 12 weeks.	Exempt: persons in remote areas, provided work would require overnight stay, or commute would exceed 2 hours (longer if in accord with community standards and agreed to by participant).	Adult share of benefit is ended for progressively longer times: first noncompliance, 2 months; second violation, from 6-12 months; third violation, 6-36 months. Penalty for voluntarily quitting a job: adult share of benefit is ended for 6 months.
Iowa	Not specified in plan.	Under 3 months.	Exempt: Disabled persons.	Progressive sanctions — first noncompliance: adult share of benefit is ended for 3 months, if still out of compliance, family eligibility is ended (100% benefit cut) for 6 months; subsequent violation(s) family’s eligibility is ended for 6 months.
Kansas	24 months	Under age 1.	Exempt: persons who are ill, injured, or disabled; needed to care for incapacitated family member; or at least age 60.	First violation: family benefit is ended until compliance; for subsequent violation(s), family benefit is ended for at least 2 months.
Kentucky	24 months	Under age 1.	Special exemptions may be given to recipients in cases of domestic abuse.	Adult share of benefit is ended for 3 months and child(ren)’s share paid to a third person. Thereafter, adult is offered another opportunity to engage in work.

State	Maximum months of benefits without work	Exemptions to care for a young child	Other work exemptions	Sanction for failure to comply with work rules
Louisiana	Not specified in plan. (<i>Note</i> : state has 24-month benefit cutoff limit within 60 months.)	Under age 1.	Exempt: persons who are incapacitated or disabled.	For refusal to accept full-time employment, family loses eligibility (100% benefit cut) for 3 months (which will count toward the 24-month benefit cutoff time limit).
Maine	24 months	Under age 1. (Immediate job search required if no child under age 5)	Exempt: persons unable to work because of physical or mental handicaps including pregnancy complications; those needed to care for an impaired household member, with need verified by a doctor's certificate; those at least age 60; and those with a child who has documented needs relating to physical disabilities, mental illness/retardation, developmental delays/disabilities, and/or emotional or behavior problems.	Adult share of benefit is ended and child(ren)'s share paid to a third person (protective payee), where possible.
Maryland	Not specified in plan.	Under age 1.	Exempt: persons who are severely disabled.	Family's eligibility is ended (100% benefit cut) after conciliation process, for which 30 days are allowed. Benefit resumes immediately upon compliance in the first instance of noncompliance; after 10 days in the second instance, and after 30 days in the third instance. After termination, family may receive "transitional assistance" (TA), provided non-profit group is available to administer it. Under TA, 3 months of full benefits would be paid on family's behalf to the non-profit group.

State	Maximum months of benefits without work	Exemptions to care for a young child	Other work exemptions	Sanction for failure to comply with work rules
Massachusetts	60 days	Under age 2.	Exempt: persons who are disabled (under state regulations); essential to care of disabled child or spouse; pregnant women (in third trimester); and caretaker recipients without legal obligation to support the children. (In two-parent families, only one parent can claim exemption to care for a child or disabled person. If one parent is disabled or pregnant, the other cannot claim exemption as caregiver without medical documentation that first parent cannot care for the child.)	Failure to participate for the minimum number of hours per week ends the adult's eligibility (and share of the benefit). Failure to participate more than once ends the family's eligibility.
Michigan	24 months	Under 3 months.	Exempt: persons who are at least age 65 or disabled (meeting SSI definition without requirement of minimum duration). Local offices may exempt homeless persons and victims of domestic abuse.	If noncompliance occurs during first 2 months of assistance, benefits for entire unit are ended. If family reenters the program, noncompliance then causes a 25% TANF benefit cut (and 25% cut in food stamp benefits) for 1-4 months, after which benefits are terminated.
Minnesota	6 months (Counties may require work sooner.)	Under age 1.	Exempt: persons at least age 60; those with professionally certified illness, injury or incapacity that is expected to continue for more than 30 days; persons needed to assist ill or incapacitated household members; pregnant women (if a physician certifies that they cannot work); individuals with a personal or family crisis that makes them incapable of meeting work requirements, as determined by the county; persons ruled disabled by the Social Security Administration; and, for 3 to 12 months, domestic violence victims who are complying with a safety plan.	For the first occurrence of noncompliance, benefit is cut by 10% for at least 1 month. For a second or subsequent occurrence of noncompliance, the family's rent (up to the amount of the full benefit) is paid to the vendor. At county option, the family's utility bill also is vendor paid. The residual amount of the grant after vendor payment(s), if any, must be reduced by an amount equal to 30% of the full benefit before payment to the family. The grant reduction must be in effect for at least 1 month (and until compliance). The vendor payment of rent (and utilities, if in effect) shall be in effect for at least 6 months.

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State	Maximum months of benefits without work	Exemptions to care for a young child	Other work exemptions	Sanction for failure to comply with work rules
Mississippi	24 months	Under age 1.	Exempt: persons who are incapacitated; temporarily ill or injured; pregnant in the third trimester; caretakers of an ill or incapacitated person; aged above 60; domestic violence victims (12 month limit); caretakers in a two-parent family of a child who is mentally retarded or physically handicapped; and persons in substance abuse treatment.	100% benefit cut for progressively longer times: first violation, 2 months or until compliance, if later; second violation, 6 months; third violation, 12 months; and fourth violation, permanent end of family benefit.
Missouri	24 months	Under age 1.	Exempt: persons who are ill, incapacitated or needed at home because of another's illness or incapacity.	Needs of noncomplying adult are removed from the assistance unit and the benefit is reduced by that individual's prorata share for any months he/she is not in compliance.
Montana	24 months	No exemptions specified in plan.	Domestic violence victims may be exempted from work rules for 6 months.	Adult share of benefit is ended for progressively longer periods: First instance of noncompliance, 1 month; second violation, 3 months; third violation, 6 months; fourth and subsequent violations, 12 months. During TANF sanction period, food stamp benefits are cut 25% and the adult's Medicaid eligibility is ended. (Children's TANF benefits continue and time limit clock continues to tick during sanction period.)
Nebraska	24 months (from signing of economic contract)	Under 3 months.	Exempt: On case-by-case basis, persons with verified physical or mental incapacity expected to prevent work or training for at least 3 months.	100% benefit cut for progressively longer periods: First noncompliance, 1 month or until compliance, if later; second violation, 3 months; third violation, 12 months.

State	Maximum months of benefits without work	Exemptions to care for a young child	Other work exemptions	Sanction for failure to comply with work rules
Nevada	24 months	Under age 1.	Exempt: non-parental caretakers; persons who are ill or physically or mentally incapacitated; needed to care for an ill or incapacitated household member; at least age 60; or suffering from any other condition deemed to be a hardship by the state welfare administrator.	Progressive sanctions: For failure to comply with personal responsibility plan or cooperative agreement, benefit is cut by one-third (or if greater, per capita share of family benefit) for 30 days; if still noncompliant, benefit is cut by two-thirds (or per capita sum) for 1 month; if still noncompliant, benefit is ended for at least 3 months. Upon first reentry to program, after losing eligibility, same schedule of sanctions applies for new violations. Upon second reentry (after twice losing eligibility) a new violation causes a 50% benefit cut for 1 month. If then still noncompliant, benefit is ended (100% cut) permanently.
New Hampshire	Immediate job search for maximum of 26 weeks, “work for benefits” for a maximum of 26 weeks.	Under age 3. Exemption ends at age 1 if baby was born to a mother already receiving aid.	Temporarily exempt: persons medically certified as unable to participate because of illness, injury or incapacity; persons needed to care for an ill or incapacitated household member; women at least 4 months pregnant. Also exempt: The second parent in a two-parent case if family is not receiving child care aid.	Progressive sanctions — first noncompliance (or violations that occur more than 6 months after the end of the most recent sanction period): adult share of benefit is ended for 1 month or until compliance, if later; continued noncompliance for 3 months: benefit is further reduced, by loss of one-third of the remaining benefit (generally the children’s share) for 1 month; continued noncompliance after another 3 months: benefit is further reduced, by loss of two-thirds of children’s benefit, for 1 month or until compliance; after an additional 3 months of noncompliance, the case is closed.

State	Maximum months of benefits without work	Exemptions to care for a young child	Other work exemptions	Sanction for failure to comply with work rules
New Jersey	24 months	Under 12 weeks. (Extension allowed if determined medically necessary for the parent or child.)	Exempt (New Jersey uses the term “deferred”): persons determined to be physically or mentally impaired; at least age 60; women in third trimester of pregnancy; sole caretakers of a severely disabled or seriously ill family member; victims of domestic violence under specified conditions.	Adult share of benefit is ended for 1 month; if intended compliance then is not evident, benefit cut is extended for up to 2 more months; at end of 3rd month, if no compliance effort is evident, benefit is ended (100% benefit cut). Same sanction schedule is used for two-parent families, if only one is required to work (because the other is exempt or working).
New Mexico	24 months	Under age 1.	Exempt: persons who are temporarily or completely disabled; those who provide sole care for a disabled person; pregnant women in last trimester; persons over age 60; victims of family violence under certain conditions.	Progressive sanctions — first instance of noncompliance: 25% benefit cut until compliance; second violation, 50% benefit cut; third violation, 100% benefit cut for at least 6 months (family ineligible to reapply for 6 months) <i>Note</i> : Conciliation process must precede imposition of initial penalty.
New York	24 months	Under age 1. (Lifetime ceiling of 12 months, with only 3 months charged to any one child. Mother may be exempted for first year of life of 4 babies. <i>Note</i> : local district may modify policy.)	Exempt: persons who are ill, incapacitated, at least age 60, or deemed to be disabled; pregnant women in last month before expected childbirth; persons needed in the home because of a family member’s illness or incapacity.	For first violation, adult share of benefit is ended until compliance. For repeat violations, a minimum penalty period applies: 3 months for second offense and 6 months for subsequent ones.

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State	Maximum months of benefits without work	Exemptions to care for a young child	Other work exemptions	Sanction for failure to comply with work rules
North Carolina	Immediate	Under age 1.	Exempt: persons who are disabled or incapacitated; needed to care for a disabled or incapacitated household member; and persons at least age 65.	First instance of noncompliance: \$50 benefit cut for 3 months. For repeat violations, the benefit cut is increased to \$75 and imposed for progressively longer periods: second violation, 3 months; third violation, 6 months; subsequent violations 12 months.
North Dakota	24 months	Under age 4 months.	Exempt: persons who are incapacitated; caring for a severely disabled child requiring in-home care; age at least 60; and victims of domestic violence whose experiences justify considering them incapacitated.	Progressive sanctions — First instance of noncompliance: adult share of benefit is ended for at least 1 month and case closed if noncompliance persists 6 months. Second violation: adult share of benefit is ended for at least 2 months and case closed after 4 months of continued noncompliance. For subsequent violations: adult share of benefit is ended for 3 months, and case closed after 4 months of continued noncompliance.
Ohio	24 months	Under age 1. (County option. If county exempts parent of infant, it must require her to participate in a “developmental activity,” such as high school completion.)	County discretion. County may assign persons found to have a barrier to regular “work activity” to one or more “alternative work activities.” Examples: parenting classes and life-skills training; substance abuse treatment; finding a home (for a homeless family); residing in a domestic violence shelter, receiving counseling or treatment, or participating in criminal justice activities against the offender (for a victim of domestic violence); and studying English as a second language. No more than 20% of a county’s adult caseload may be assigned to alternative work activities. In effect, these persons are exempted from regular work requirements.	For failure to comply with self-sufficiency contract, family benefit is ended (100% benefit cut) for progressively longer periods: first violation, 1 month or until compliance, if later; second violation, at least 3 months; subsequent violations, at least 6 months. Upon the third violation, the adult also loses TANF-derived Medicaid eligibility (but may be eligible on other grounds).

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State	Maximum months of benefits without work	Exemptions to care for a young child	Other work exemptions	Sanction for failure to comply with work rules
Oklahoma	24 months	Under 3 months.	None	Case is closed for refusal to cooperate with agreed upon work activities.
Oregon	Not specified in plan. (<i>Note:</i> state limits a recipient to 24 months of benefits within an 84 month period.)	Under 90 days.	Exempt: women in their ninth month of pregnancy; VISTA volunteers; persons who must travel an unreasonable distance or remain away from home overnight; persons at least age 60; and those determined to be unable to participate because of individual conditions or circumstances. Women in their seventh or eighth month of pregnancy cannot be required to work more than 10 hours per week.	Progressive sanctions — first instance of noncompliance: \$50 benefit cut; continued noncompliance after 2 months: removal of noncomplying person from benefit; continued noncompliance after another 4 months: loss of eligibility for entire family. After being sanctioned at a higher level, a person cannot return to the first level sanction.
Pennsylvania	24 months	Under age 1.	Exempt: persons verified as physically or mentally disabled and precluded from any form of employment or work activity; caretakers of a child under 6 for whom needed care is unavailable..	Progressive sanctions that also depend on time spent on the program. During the first 24 months, the adult share of the benefit is ended for periods that lengthen with repeat violations; after 24 months this policy of progressively longer penalty periods applies to the full family benefit. First violation: a minimum of 30 days; second violation: 60 days; third violation: permanent. If a person voluntarily reduces required work hours during the first 24 months, the benefit is cut by the value of the reduced earnings. If this occurs after the first 24 months, the family's eligibility ends.
Puerto Rico	24 months (6 months if judged work-ready)	Under age 1.	Exempt: adults age 60 or older; persons with verified physical or mental impairment that prevents work; a woman in her last quarter of pregnancy; and a single parent with a disabled child who needs continual care.	Adult share of benefit is ended and child(ren)'s benefit paid to a "protective" third party.

State	Maximum months of benefits without work	Exemptions to care for a young child	Other work exemptions	Sanction for failure to comply with work rules
Rhode Island	52 days after developing employment plan (work or work-readiness); 24 months (work).	Under age 1.	Exempt: persons with illness or injury that temporarily prevents work and training; those incapacitated by a physical or mental impairment; at least 60 years old; needed to give care to ill or disabled child or spouse; and pregnant women in the third trimester. During the first 3 months of an employment plan, the second parent is exempt if the other parent participates in work activity or when one parent is ill or incapacitated. Deferred: 18- and 19-year old adults who are successfully pursuing high school diploma on a full-time basis; single adults aged 20 or older who are participating in full time program to attain basic literacy or English language skills; and adults aged at least 20 who are participating in vocational education or skills or job training, including secondary education without limit (program must have begun before 25th month and will not be deemed “work activity” after 36th month of employment plan).	During first 24 months, adult share of benefit is ended (after conciliation process) for violations. After 24 months, progressive sanctions apply. The benefit is cut by more than the adult’s share as follows: during first 6 months of noncompliance (months 25-30 of employment plan); 110% of adult portion; during months 7 through 12 of noncompliance, 120% of adult portion; during months 13 through 18 of noncompliance, 130% of adult portion; during months 19 through 24 months of noncompliance, 140% of adult portion. If the adult still fails to comply, the family’s benefit will be reduced by 100% of the adult portion, and the child(ren)’s benefit paid to a protective third party.
South Carolina	24 months	Under age 1 (but only if mother is at least 25 years old and has completed high school).	Exempt: persons with a verified physical or mental impairment that prevents work, education, or training; those caring for an incapacitated person; those without needed child care or reasonable transportation; and women in the last trimester of pregnancy. In two-parent family, second parent is exempt unless agency provides child care for family.	Family benefit is ended (after 30-day conciliation process). To restore eligibility, adult must reapply and demonstrate compliance for 30 days.

State	Maximum months of benefits without work	Exemptions to care for a young child	Other work exemptions	Sanction for failure to comply with work rules
South Dakota	24 months	Under 12 weeks.	Exempt: persons approved to receive disability payments from the Veterans' Administration or the Social Security Administration.	For refusal of work or extra work hours (or for ending work or reducing hours), family loses eligibility for a maximum of 3 payment months. For first failure to comply with a personal responsibility plan, family receives a verbal warning; for second failure, 50% benefit cut for at least 1 month; for subsequent violations, 100% benefit cut and program disqualification for 1 month.
Tennessee	Immediate	Under 4 months.	Exempt: persons who are permanently disabled or temporarily incapacitated; those at least age 60, and in-home caretakers of disabled relatives; and, under certain conditions, victims of domestic violence.	For first violation, family benefit is ended (after conciliation process) until compliance. For second and subsequent instances, benefit is lost for a minimum of 3 months.
Texas	Not specified in plan. (<i>Note:</i> state has benefit cut-off limits of 12 months, 24 months and 36 months, depending on work history and education.)	Under age 4 (does not apply to child born after parent's enrollment).	Caretakers of physically or mentally disabled children who require the caretaker's presence.	Benefit cut of \$78 monthly for a single-caretaker case, \$125 for a two-parent case.
Utah	Immediate	None specified.	No exemptions. However, temporary suspensions are for illness, medical problems, and search for quality child care.	Benefit cut of \$100 (parent's fixed portion). Loss of full family benefit if a formal conciliation process finds the parent is capable of participation, but has chosen not to.

State	Maximum months of benefits without work	Exemptions to care for a young child	Other work exemptions	Sanction for failure to comply with work rules
Vermont	30 months (single-parent families); 15 months (two-parent families). For families who have not lived in the state for 12 months, work-trigger limit is 5 months. (Community service required after these periods)	Under 6 months (exemption from participation in JOBS — under pre-TANF waiver). Under 18 months (exemption from community service). These provisions apply to families who have reached the work-trigger time limits shown in adjacent column.	Exempt: persons at least age 60, disabled or incapacitated; caring for a disabled relative. Also, waiver permits caretakers other than relatives specified for AFDC to receive caretaker benefits and exempts them from work and training requirements.	Penalties for a family at least 2 months away from the work-trigger time limit — that is, during first 28 months of benefits (13 months for a two-parent family): First violation, adult share of benefit is ended until compliance; for repeat violations a minimum penalty period applies: 3 months for second offense, 6 months for subsequent ones. After 28/13 months, when family is within 2 months of work-trigger limit, parent must undertake 2 months of job search. Penalties for refusal to perform job search, or, afterward, to accept a job or community service employment: Cash aid is replaced by vendor payments for major expenses (housing, food, fuel and other utilities), and the family loses the right to receive benefits by mail or electronic transfer. Balances due the family, if any, are paid at three required monthly meetings with the caseworker, and special reporting requirements are imposed. (In the case of a two-parent family with an unemployed principal earner, the benefit amount is reduced by the share of the non-complying parent.) The vendor payment sanction lasts until the parent accepts a job/community service employment and fulfills work requirements for at least 2 weeks. If penalized family fails to attend required meetings or submit reports, its TANF benefit is ended.

State	Maximum months of benefits without work	Exemptions to care for a young child	Other work exemptions	Sanction for failure to comply with work rules
Virgin Islands	Not specified in plan	Under 6 months.	Exempt: persons certified physically/mentally unable to work, and domestic violence victims in a “protective setting.”	First violation: Benefit reduced by adult share, food stamps cut by 10%, and adult removed from Medicaid. Repeat violations may result in ending the family’s TANF case.
Virginia	90 days	Under 18 months.	Exempt: pregnant women (after first trimester); non-parental caretakers; persons who are age 60 or incapacitated; sole caregivers of a relative who is incapacitated (as shown by receiving SSI or DI, or by a physician’s statement).	Family benefits are ended for progressively longer periods: first instance of noncompliance, at least 1 month or until compliance, if longer; second violation, 2 months; third and subsequent violations, 6 months. Also, local departments of social services are authorized to end cash and food stamp benefits of a person whose employer dismisses him from a job subsidized with welfare benefits because of attendance or performance problems.
Washington	Immediate job search required	Under age 1. (However, after June 30, 1999, this drops to under 3 months.)	None specified.	Adult share of benefit is ended. Full family benefit may be ended, if determined appropriate.
West Virginia	24 months	Under 6 months (under 2 years for 1st birth after mother first enrolls in TANF).	Exempt: parents caring for a dependent child with a life-threatening illness; persons over age 60; persons with a physical or mental incapacity as defined by federal regulations; persons suffering from a temporary debilitating injury; relatives providing in-home care for a person who would otherwise be institutionalized; and women during the last trimester of pregnancy.	Progressive sanctions — first instance of noncompliance: one-third reduction of benefits for 3 months; second violation: two-thirds reduction of benefits for 3 months; third violation: termination of benefits.

State	Maximum months of benefits without work	Exemptions to care for a young child	Other work exemptions	Sanction for failure to comply with work rules
Wisconsin	Immediate	Under 12 weeks.	None	A person who refuses to participate three times in any component of the Wisconsin Works program (W-2) loses eligibility for that component. Every missed hour of required activity in community service or “transitional placement” causes a reduction of \$5.15 in the cash grant.
Wyoming	Immediate job search required.	Under 3 months.	Exempt: persons over age 65 unable to work; and, under certain circumstances, victims of domestic violence.	For a month in which the adult fails to comply with the personal responsibility plan, the family benefit (“performance payment”) is ended. Food stamp and Medicaid benefits for that adult are ended the next month. Food stamp and Medicaid benefits continue for the child(ren).

a/ Table does not cover exemption/sanction rules for *minor* parents. Under federal law, unmarried minor parents without a high school diploma are ineligible for TANF unless, once their youngest child is 12 weeks old, they return to school or enter an approved alternative educational or training program; they also must live in an adult-supervised arrangement.