

REPORT TO THE LEGISLATURE

Examining Temporary Assistance for Needy Families Time Limit and Sanction Data *Disaggregated by Race and Ethnicity*

As required by RCW 74.08A.265

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STATUTORY REQUIREMENT

RCW [74.08A.265](#), amended by [Second Substitute Senate Bill 6478 \(Chapter 320, Laws of 2020\)](#), requires the Department of Social and Health Services (DSHS) to produce an annual report of disaggregated data identifying the race of individuals whose Temporary Assistance for Needy Families (TANF) benefits were reduced or terminated during the preceding year due to:

- (a) Sanction as described in [RCW 74.08A.260](#); or
- (b) Reaching the 60-month time limit under [RCW 74.08A.010](#).

If the disaggregated data for terminated or sanctioned individuals shows a disproportionate representation of any racial group that has experienced historic disparities or discrimination, DSHS must describe the steps it is taking to address and remedy the racial disproportionality.

BACKGROUND

In 2018 and 2019, DSHS' Economic Services Administration (ESA)'s Management Accountability and Performance Statistics (EMAPS) and Research and Data Analysis staff began examining TANF/State Family Assistance (SFA) data, exploring whether disproportionality in application of both the time limit extension and sanction policies existed. A disproportionate impact of time limit policy on Black and Native American families was found. Compared to all TANF clients, Black and Native American clients were disproportionately more likely to experience a time limit related closure of benefits or, if reapplying for benefits, have their application denied based on not meeting time limit extension criteria.¹ At that time, no racial disproportionality was seen with application of TANF/SFA sanction policy.

In September 2019, ESA's Community Services Division (CSD) presented these [findings](#) during a legislative work session and discussed efforts to better understand and work towards eliminating these disparities. The following year, [Second Substitute Senate Bill 6478 \(Chapter 320, Laws of 2020\)](#) required DSHS to produce an annual report on disproportionality in time limit and sanction policy.

CSD has continued to examine why time limit disproportionality exists and options for eliminating it. Since 2019, practice changes have occurred to address implicit bias, and the Legislature has adopted and funded policy to mitigate the disproportionate impact of TANF policies. DSHS has also adopted an [agency-wide initiative](#) which, fundamentally, works towards mitigating factors which influence disproportionate impacts of program policies.

¹DSHS TANF Time Limit Analysis Comparing Cases Closed Due to Time Limits with Other Case Closures, October 2018 (Revised February 2019), Christina McHugh, M.A., M.P.P., J. Taylor Danielson, Ph.D. - *A comparison of clients terminated or denied a TANF time limit extension in SFY 2017 showed that Black/African American clients were only 19% of all TANF clients, but 31% of the clients terminated or denied for time limit, while American Indians were 9% of all TANF clients and 13% of clients terminated or denied for time limit¹. Some, but not all, of the disproportionality was associated with higher likelihood of adults in this demographic reaching the 60-month time limit.*

Time Limit Policy

Federal law places a 60-month time limit on federally funded TANF benefits for an adult in their lifetime. Adults may qualify for an extension to this time limit, based on criteria established by the state. As an adult recipient approaches the 60-month limit, CSD works with them to determine if they are eligible for an extension on aid. To qualify for a time limit extension, the recipient must provide documentation that they meet at least one time limit extension criteria.

Since 2019, there have been major practice and policy changes to improve the state's time limit policy, allowing greater access to TANF for families:

- Beginning in June 2019, CSD required all time limit extension denials to have a supervisory review. Automation to support this review was available (July 2023) upon resumption of time limits following the pandemic related public health emergency.
- Effective July 2019, [Second Substitute House Bill 1603](#) expanded reasons for extending a family's time on aid beyond 60 months to include homelessness.²
- In April 2020, broad extensions to aid were temporarily allowed for all families to provide basic safety net support during the unstable health and economic conditions of the COVID-19 pandemic. State budgets adopted in 2021 and 2022 supported this policy, extending TANF cash assistance to families who didn't meet any of the prevailing time limit extension criteria.³ This broad policy ended, effective July 2023, correlating with the end of the pandemic related public health emergency.
- Effective July 2021, [Second Substitute Senate Bill 6478](#) broadened the definition of homelessness for the purpose of extending time on aid to align with the federal McKinney-Vento definition. It includes those who are doubled-up, sharing housing for financial reasons, or caring for a child relative who is homeless, even if the caregiver is not homeless themselves.
- Effective July 2022, [Second Substitute Senate Bill 5214](#) allowed additional time on aid for individuals who received TANF during the height of the COVID-19 pandemic, when the Washington unemployment rate was greater than or equal to 7%.⁴
- Effective July 2023, [House Bill 1755](#) allowed additional time on aid for individuals with over 60 months of TANF when the unemployment rate is 7% or higher, per the most recently published data available through the Employment Security Department.
- Effective July 2023, [Second Substitute House Bill 1447](#) eliminated the time limit for households with parents who are themselves ineligible for aid, due to receipt of SSI, their legal status, or immigration status.⁵ These households can continue to receive cash assistance benefits until the child ages out of assistance or the household no longer meets eligibility criteria for TANF/SFA.⁶

² [A previous legislative report](#) included findings showing that expansion of homelessness time limit extension criteria was beneficial for Black/African American and American Indian/Alaska Native clients, as these groups are more likely to receive homelessness related time limit extensions compared to other subgroups.

³ [Supplemental Operating Budget: Engrossed Substitute Senate Bill 5693 \(Chapter 297, Laws of 2022\)](#)

⁴ This policy wasn't accessed by families until the COVID-19 broad time limit extension policy ended, July 2023.

⁵ In a [previous legislative report](#), households with an ineligible parent were disproportionately households of color (Hispanic and Latino children were particularly overrepresented among those losing TANF/SFA benefits due to this policy). This legislation helped mitigate disparities for these families.

⁶ Per ESA Report #5946 - "Race and Ethnicity for Clients on TANF/SFA Child-Only Cases with an Ineligible Parent and Clients on TANF/SFA Child-Only Cases with an Ineligible Parent and a COVID-19 Time Limit Extension, June 2023": *While 53.3% of children on child-only TANF/SFA cases with an ineligible parent were Hispanic or Latino, 94.8% of children on child-only TANF/SFA cases with an ineligible parent and a COVID-19 time limit extension*

- Effective July 2024, [Substitute House Bill 2007](#) allowed additional time on aid for individuals with a child under the age of two, and who are eligible for an infant, toddler, or postpartum exemption.

While the reasons for extending time on aid have expanded since 2019⁷, there are many families who still face termination from assistance due to time limits.

TANF time limit policy is driven by federal statute. A state may incur a financial penalty if more than 20% of its federally funded TANF caseload is composed of cases with adult recipients who continue to receive benefits beyond 60 months. It should be noted that Washington state did not enforce a time limit for TANF prior to February 2011, and that was also the case during the COVID-19 pandemic, from March 2020 to July 2023. Washington has no history of exceeding the federal 20% cap noted above, including those time periods where the time limit was not enforced.

As noted above, federal TANF time limit policy only applies to adult recipients. Per federal law, dependent children within TANF families do not have a time limit on assistance. While federal law prohibits a state from leveraging TANF federal funds to continue aid to families who do not qualify for a time limit extension and/or aid to families beyond the 20% cap on time limit extensions, it does not prohibit a state from leveraging state funds to continue to support families with aid beyond 60-months.⁸

Several states have flexed beyond federal policy to continue to support families, including:

- **California**, which provides a safety program to families by continuing aid for children in the household, reducing the family's grant only by the parent(s)/adult(s) share when the family exceeds 60-months on CalWORKs (California's implementation of TANF).⁹
- **Oregon** eliminated full family termination after 60 months. When the adult(s) have reached the 60-month time limit, the child's portion of the grant is maintained.¹⁰
- **Washington DC**, which provides assistance to the entire family beyond 60 months without need to assess whether an extension is appropriate.¹¹

Sanction Policy

CSD case managers connect parents and caregivers to education, job training and employment opportunities through WorkFirst. DSHS' [sanction policy](#) reduces and then eventually terminates TANF benefits when an adult required to participate in WorkFirst:

- Does not prepare for and seek employment, or otherwise participate, without good cause.
- Fails to attend a non-compliance meeting or make contact with DSHS.

Sanction is a penalty that reduces and then terminates a family's TANF cash benefit. Federal TANF rules ([Sec 407 \(e\) \(1\) 42 USC 607](#)) require sanction, but allow states to determine whether the grant will be reduced by a pro rata share (based on the share of the adult who is not participating), reduced by a larger than pro rata share, or ended. States also have the ability to establish good cause or other

were Hispanic or Latino. If the ineligible parent time limit had not been eliminated, Hispanic and Latino children were likely to have been overrepresented among those losing access to TANF/SFA benefits.

⁷ Current criteria for extending time on TANF assistance can be found in [WAC 388-484-0006](#) and [WorkFirst Handbook Section 3.6.1.5](#)

⁸ [42 U.S.C. 608 \(a\)\(7\)\(A\), \(B\), and \(F\); Policy Basics: Temporary Assistance for Needy Families | Center on Budget and Policy Priorities \(cbpp.org\)](#)

⁹ [CalWORKs Program Fact Sheet, All County Letter 20-113](#)

¹⁰ Oregon Department of Human Services, [9942 60-month Time Limit for Receiving \(state.or.us\)](#)

¹¹ [Washington DC TANF State Plan](#)

exceptions. Federal law requires, at a minimum, the reduction of cash assistance if an individual does not comply with the WorkFirst program. Greater penalties may be applied and states have the option of terminating assistance due to non-compliance.

Since 2019, the following temporary and permanent sanction policy and practice changes have occurred in Washington state to broaden support for families:

- Effective July 2019, [Second Substitute House Bill 1603](#) eliminated a family from becoming permanently disqualified from TANF after three sanction related terminations from aid.¹²
- In response to the COVID-19 pandemic, from April 2020 – September 2021, participation requirements and the sanction process were temporarily suspended for WorkFirst.
- Effective July 2021, [Substitute House Bill 2441](#) lengthened the amount of time a family could be in a reduced grant due to sanction, prior to facing complete termination from assistance. After two consecutive months of non-compliance, a family’s grant is reduced by 40% or the non-complying adult’s pro rata share, whichever is greater. If the parent does not resume participation within 10 months after grant reduction, cash assistance for the entire family is terminated.¹³
- Effective July 2023, [Second Substitute House Bill 1447](#) expanded the definition of good cause reasons for failure to participate in the WorkFirst program to include any hardship that would reasonably prevent program participation, as defined by DSHS.

While Washington state’s sanction policy has made progress towards better supporting families experiencing poverty since 2019, it continues to be stricter than what is required by federal law. Federal law asserts that states must reduce *or* terminate cash assistance for failure to comply with an individual responsibility plan. Washington state goes beyond the federal requirement by reducing *and* then terminating the family’s entire cash benefit. This optional policy is commonly referred to as “full-family sanction,” since both the children and adults in the household lose access to assistance. In addition, federal law dictates the reduction must be at least a ‘pro rata’ share of the total grant amount (discussed above in this section). Currently, Washington goes beyond this by reducing the grant by the ‘pro rata’ amount or 40%, whichever is **greater**.¹⁴

A number of other states have taken a less punitive approach to sanction related policy¹⁵:

- **California** does not impose full-family sanctions/terminations and does not apply the time limit on aid to adults in sanction status. This requires additional state funding to support families with sanctioned adults that exceed the TANF federal time limit of 60 months.
- **Connecticut** does not have full-family sanctions/terminations, effective July 2022.
- **Illinois** does not have full-family sanctions/terminations. The adult portion of the benefit is reduced by 30% when the adult(s) are in non-compliance with participation requirements.
- **Oregon** does not have full-family sanctions/terminations. Only 25% of the household’s cash assistance grant is subject to penalty, at maximum.
- **Maryland** does not have full-family sanctions/terminations. The adult portion of the benefit is reduced by 30% when the adult(s) are in non-compliance with participation requirements.

¹² EMAPS Report #5424, *Demographic Profile of TANF/SFA Clients by Whether an Adult on the Case was Previously or Potentially Permanently Disqualified, July 2019- June 2021* – Data shows all clients benefitted from this change, though Black/African American and American Indian/Alaska Native populations particularly benefitted, as they had previously lost access to TANF/SFA at a higher rate compared to other populations due to permanent disqualification.

¹³ WorkFirst participants became subject to this updated sanction policy upon resumption of participation requirements, September 2021.

¹⁴ [WAC 388-310-1600](#)

¹⁵ California Regulations – [Eligibility and Assistance Standards Manual 42-721, 42-302.115](#); Connecticut State Legislation - [Senate Bill 286](#); Welfare Rules Database, Office of Planning, Research, and Evaluation (OPRE) and Urban Institute, [The Welfare Rules Database - Urban Institute](#).

- **New York** does not have full-family sanctions/terminations and reduces a pro-rata share of the benefit until compliance with participation requirements occurs.
- **Washington D.C.** decreased the maximum sanction reduction penalty to 6% of the household's total benefit, meaning that only 6% of the grant is subject to penalty.

Additional Supportive Practice Changes

Since 2019, CSD has leveraged methods to examine the TANF time limit extension process which has resulted in the documentation of potential bias in determinations. In response, CSD has:

- Facilitated trainings and discussions to mitigate possible unconscious bias.
- Established supports to help staff connect ESA poverty reduction goals to their daily work and educate staff on the importance of routinely monitoring for bias in their daily work.
- Introduced tools and related practice to staff involved in policy analysis and leveraged those for specific process improvement workgroups on topics of EBT services, fraud referral, and initial engagement redesign.

DSHS has engaged in a similar process for all agency legislative and funding requests (decision packages), driven by the Office of Financial Management and the Governor's Office, with training provided to staff in policy, budget, and other roles. In addition, CSD applied strategies to support consistent, client-centered and strengths-based case management, including:

- Foundational (all staff) training on the impacts of poverty and racism, and ways we can adapt our practices to be more empathetic and effective with those we serve (*throughout 2021*).
- Implementation of a trauma-informed and client-centered evaluation and assessment tool to support initial engagement of WorkFirst program participants (*September 2021*).
- Update and refresh of the WorkFirst Core training (delivered to all new staff supporting the WorkFirst program) to include foundational training videos, time for reflection, and discussion activities regarding neuroscience, epigenetics, Adverse Childhood Experiences, Resilience, and Trauma Informed Approach to supporting clients (*Winter 2023*).
- Deployment of a revamped 'culture training' to bolster staff's understanding of poverty dynamics, with the goal of increasing awareness and empathy and ensuring additional hurdles are not intentionally or unintentionally created for those served by CSD programs (*2024*).

LATEST FINDINGS FROM STATE FISCAL YEAR 2025

Impact of Time Limits

The table below (Table 1) reflects that two populations within Washington state have in the past state fiscal year disproportionately lost access to TANF/SFA benefits due to time limit requirements.

Table 1: Race and Ethnicity Breakdown of TANF/SFA Clients on Adult Recipient Cases, Compared to Clients whose Case Closed Due to the Time Limit, July 2024 – June 2025¹⁶

		TANF/SFA Clients on Cases with Adult Recipients		Clients on TANF/SFA Cases Terminated Due to the Adult Recipient Time Limit ¹⁷			
		# of Clients	% Clients	# of Clients	% Clients	Risk ¹⁸	Risk Ratio ¹⁹
Number of Clients²⁰		139,618	100.0%	3,268	100.0%	2.3%	1.00
Ethnicity and Race	Hispanic or Latino	39,265	28.1%	740	22.6%	1.9%	0.81
	Not Hispanic or Ethnicity Not Reported	100,353	71.9%	2,528	77.4%	2.5%	1.08
	White	51,425	36.8%	1,387	42.4%	2.7%	1.15
	Black/African American	17,957	12.9%	612	18.7%	3.4%	1.46
	Asian/Pacific Islander	11,921	8.5%	148	4.5%	1.2%	0.53
	American Indian/Alaska Native	4,068	2.9%	131	4.0%	3.2%	1.38
	Two or More Races	4,922	3.5%	135	4.1%	2.7%	1.17
	Race Not Reported	10,060	7.2%	115	3.5%	1.1%	0.49

Black/African American and American Indian/Alaska Native clients continued to disproportionately lose access to TANF/SFA due to time limit requirements when compared to all clients, which has been an ongoing trend for multiple years. Per Table 1, Black/African American clients are 12.9% of all clients but 18.7% of those whose case have been terminated due to time limit requirements (risk ratio of 1.46 – 46% higher risk). American Indian/Alaska Native clients are 2.9% of all clients but 4.0% of those whose cases have been terminated due to time limit requirements (risk ratio of 1.38 – 38% higher risk).

When compared to 2024, the risk ratios for these two populations have decreased. In 2024, the reported risk ratio for Black/African American clients was 1.74 (74% higher risk) and American Indians/Alaska Natives was 1.42 (42% higher risk).²¹ **This means that the level of disproportionate impact of time limit requirements on these groups has decreased in the past year.**

In 2023 and 2024, clients who identified as ‘Two or More Races’ were also found to disproportionately lose access to TANF/SFA due to time limit requirements (46% higher risk in

¹⁶ EMAPS Report #A6233 using the ACES Data Warehouse, Aug. 2025 load. Green shading indicates a risk ratio of at least 1.20. For this report, a risk ratio of 1.20 or greater suggests potential disproportionality.

¹⁷ TANF/SFA cases with benefit terminated due to adult recipient time limit have the 229 reason code associated with termination.

¹⁸ Risk is the percentage of client experiencing a particular outcome. It is calculated by dividing the number of clients in a group who experienced the outcome by the total number of clients in that group.

¹⁹ A risk ratio compares the risk of one group experiencing a particular outcome to the risk of all groups experiencing the same outcome. It is calculated by dividing the risk for one group by the risk for all groups. A risk ratio of 1.0 indicates that risk is equal. Below 1.0 indicates lower risk, and above 1.0 indicates higher risk. For example, a risk ratio of 1.5 means that being a member of the group increases the risk of experiencing the outcome by 50%.

²⁰ Clients includes adult and child recipients.

²¹ [Examining Temporary Assistance for Needy Families Time Limit and Sanction Data Disaggregated by Race and Ethnicity](#), 2024, page 8.

2023 and 34% higher risk in 2024) – but current data indicates positive improvement for this group. Per Table 1, this group now has a risk ratio of 1.17, as they are 3.5% of all clients, though are 4.1% of those who have been terminated due to time limit policy, which drops them below the 1.20 threshold for tracking disproportionate impact of a given policy.

As of July 2025, cases with time limit extensions represented 8.7% of the caseload, down from a high of 13.5% during the COVID-19 pandemic. The decline in the proportion of these cases is due primarily to the resumption of time limit related case terminations, and less notably due to the increase in the overall TANF/SFA caseload. **In summary, from March 2020 through July 2025, households with time limit extensions have not reached more than 13.5% of the overall caseload – far from the 20% cap on federally funded cases.**²²

Impact of Sanctions

The table below (Table 2) reflects that two populations within Washington state have in the past state fiscal year disproportionately had their benefits reduced due to WorkFirst related sanction.

Table 2: Race and Ethnicity Breakdown of TANF/SFA Clients with Adult Recipients and Clients on Sanctioned TANF/SFA Cases, July 2024 – June 2025²³

		Clients on TANF/SFA Cases with Adult Recipients		Clients on TANF/SFA Cases with Grant Reduced Due to Non-Compliance Sanction ²⁴			
		# of Clients	% Clients	# of Clients	% Clients	Risk ²⁵	Risk Ratio ²⁶
Number of Clients²⁷		139,618	100.0%	11,725	100.0%	8.4%	1.00
Ethnicity and Race	Hispanic or Latino	39,265	28.1%	3,070	26.2%	7.8%	0.93
	Not Hispanic or Ethnicity Not Reported	100,353	71.9%	8,655	73.8%	8.6%	1.03
	White	51,425	36.8%	4,610	39.3%	9.0%	1.07
	Black/African American	17,957	12.9%	1,404	12.0%	7.8%	0.93
	Asian/Pacific Islander	11,921	8.5%	1,250	10.7%	10.5%	1.25
	American Indian/Alaska Native	4,068	2.9%	605	5.2%	14.9%	1.77
	Two or More Races	4,922	3.5%	407	3.5%	8.3%	0.98
	Race Not Reported	10,060	7.2%	379	3.2%	3.8%	0.45

²² Refer to **Washington Policy and Practice Evolution Since 2019, Time Limit Policy** section of this report for information on the federal TANF time limit cap.

²³ Source: EMAPS Report #6233 using the ACES Data Warehouse as of the August 2025 load. Green shading indicates a risk ratio of at least 1.20. For this report, a risk ratio of 1.20 or greater suggests potential disproportionality.

²⁴ Clients are considered to be sanctioned if their TANF/SFA case's benefit was reduced due to a non-compliance sanction. The non-compliance sanction policy for WorkFirst was modified effective July 1, 2021 (See WAC 388-310-1600). It allows two continuous months of non-compliance before DSHS applies a sanction reduction penalty to the cash grant. Households are allowed an additional ten consecutive months on a reduced grant before cash assistance is terminated.

²⁵ Risk is the percentage of clients experiencing a particular outcome. It is calculated by dividing the number of clients in a group who experienced the outcome by the total number of clients in that group.

²⁶ A risk ratio compares the risk of one group experiencing a particular outcome to the risk of all groups experiencing the same outcome. It is calculated by dividing the risk for one group by the risk for all groups. A risk ratio of 1.0 indicates that risk is equal. Below 1.0 indicates lower risk, and above 1.0 indicates higher risk. For example, a risk ratio of 1.5 means that being a member of the group increases the risk of experiencing the outcome by 50%.

²⁷ Clients include adult and child recipients.

American Indian/Alaska Native clients continued to disproportionately have TANF/SFA benefits reduced due to WorkFirst sanction when compared to all clients, which has been an ongoing trend for multiple years. Per Table 2, American Indian/Alaska Native clients are 2.9% of all clients but are 5.2% of those whose cases have received a TANF/SFA benefit reduction due to WorkFirst sanction (risk ratio of 1.77). When compared to 2024, the risk ratio for the American Indian/Alaskan Native population has declined (from 2.07).²⁸ **This means that the level of disproportionate impact of WorkFirst sanction benefit reduction on this specific group has decreased in the past year – from having a risk of 107% higher when compared to all clients, to 77% higher.**²⁹

Table 2 also indicates that Asian/Pacific Islander clients were disproportionately impacted by TANF/SFA benefit reduction due to WorkFirst sanction in the past year. This group has a risk ratio of 1.25 (25% higher risk than all clients), as they are 8.5% of the caseload though are 10.7% of those who had benefits reduced for this reason.

The table below (Table 3) reflects that a number of specific populations within Washington state have in the past state fiscal year disproportionately had their benefits terminated due to WorkFirst sanction.

Table 3: Race and Ethnicity Breakdown of TANF/SFA Clients on Adult Recipient Cases, Closed Due to Non-Compliance Sanction, July 2024 - June 2025³⁰

		Clients on TANF/SFA Cases with Adult Recipients		Clients on TANF/SFA Cases Terminated Due to Non-Compliance Sanction ³¹			
		# of Clients	% Clients	# of Clients	% Clients	Risk ³²	Risk Ratio ³³
Number of Clients³⁴		139,618	100.0%	1,119	100.0%	0.8%	1.00
Ethnicity and Race	Hispanic or Latino	39,265	28.1%	255	22.8%	0.6%	0.81
	Not Hispanic or Ethnicity Not Reported	100,353	71.9%	864	77.2%	0.9%	1.07
	White	51,425	36.8%	512	45.8%	1.0%	1.24
	Black/African American	17,957	12.9%	108	9.7%	0.6%	0.75
	Asian/Pacific Islander	11,921	8.5%	115	10.3%	1.0%	1.20
	American Indian/Alaska Native	4,068	2.9%	72	6.4%	1.8%	2.21
	Two or More Races	4,922	3.5%	28	2.5%	0.6%	0.71
	Race Not Reported	10,060	7.2%	29	2.6%	0.3%	0.36

²⁸ [Examining Temporary Assistance for Needy Families Time Limit and Sanction Data Disaggregated by Race and Ethnicity](#), 2024, page 9.

²⁹ Source: EMAPS Report #6233 using the ACES Data Warehouse August 2024 load.

³⁰ Source: EMAPS Report #6233 using the ACES Data Warehouse as of the August 2025 load. Green shading indicates a risk ratio of at least 1.20. For this report, a risk ratio of 1.20 or greater suggests potential disproportionality.

³¹ The non-compliance sanction (NCS) policy for WorkFirst was modified effective July 1, 2021 (See WAC 388-310-1600). The NCS policy allows two continuous months of non-compliance before DSHS applies a sanction reduction penalty to their cash grant. They are allowed an additional ten consecutive months on a reduced grant before the TANF or SFA case is terminated. TANF/SFA cases terminated due to a non-compliance sanction have the 252 reason code associated with the termination.

³² Risk is the percentage of clients experiencing a particular outcome. It is calculated by dividing the number of clients in a group who experienced the outcome by the total number of clients in that group.

³³ A risk ratio compares the risk of one group experiencing a particular outcome to the risk of all groups experiencing the same outcome. It is calculated by dividing the risk for one group by the risk for all groups. A risk ratio of 1.0 indicates that risk is equal. Below 1.0 indicates lower risk, and above 1.0 indicates higher risk. For example, a risk ratio of 1.5 means that being a member of the group increases the risk of experiencing the outcome by 50%.

³⁴ Clients includes adult and child recipients.

American Indian/Alaska Native clients continued to disproportionately have TANF/SFA benefits terminated due to WorkFirst sanction when compared to all clients, which has been an ongoing trend for multiple years. While American Indian/Alaska Native clients are 2.9% of all clients, they are 6.4% of those with cases terminated due to WorkFirst sanction (risk ratio of 2.21). In 2024, the risk ratio for this population was reported as 2.67.³⁵ **This means that the level of disproportionate impact of WorkFirst sanction related termination on this specific group has decreased in the past year – from having a risk of 267% higher when compared to all clients, to 221% higher.**³⁶

This year’s data also indicates that White and Asian Pacific Islander clients were also at an elevated risk of having cash benefits terminated due to WorkFirst sanction. Per Table 3, White clients were 36.8% of all clients, though 45.8% of those impacted by WorkFirst sanction related benefit termination (risk ratio of 1.24 – 24% higher risk). Asian/Pacific Islander clients were 8.5% of all clients, though 10.3% of those impacted by WorkFirst sanction related benefit termination (risk ratio of 1.20 – 20% higher risk).

It is important to note that the number of clients on cases terminated due to sanction has been decreasing over the last few years (1,786 in SFY 2023; 1,267 in SFY 2024; 1,119 in SFY 2025). This change makes interpreting disproportionality over time more complicated. Because the total number of clients whose cases closed due to noncompliance is decreasing while the total number of clients is increasing (122,566 in SFY 2023; 133,394 in SFY 2024; 139,618 in SFY 2025), the risk of having cash benefits terminated due to WorkFirst sanction has been declining too. As the percentage of clients whose cases were terminated due to WorkFirst sanction decreases, it is easier to achieve the mathematical threshold of “potential disproportionality.” With that caveat in mind, the risk of experiencing termination due to WorkFirst sanction is only slightly higher for White and Asian/Pacific Islander clients (1.0%) than it is for all clients (0.8%).

CONTINUED EFFORTS TO REDUCE DISPARATE IMPACT OF TANF POLICIES

Work continues to respond with policy and practice changes, and recommendations to promote and move towards fair program and benefit access for all families served, with DSHS leveraging [The 10-Year Plan to Dismantle Poverty in Washington](#) as its guide.

Time Limit Related Efforts

CSD has continued to focus on policy levers to improve outcomes for those impacted by time limit policy, including continued and ongoing exploration of the concept of expanding time limit extensions to all who are still facing financial hardships at the end of 60 months on TANF/SFA assistance. Further, policy clarification, as well as procedural streamlining and enhancement, to support staff with accurate implementation of time limit policy has continued.

³⁵ [Examining Temporary Assistance for Needy Families Time Limit and Sanction Data Disaggregated by Race and Ethnicity](#), 2024, page 9.

³⁶ Source: EMAPS Report #6233 using the ACES Data Warehouse August 2024 load.

Sanction Related Efforts

CSD has continued to work through stabilizing following various lasting organizational disruptions caused by the pandemic. As this process evolves, CSD continued to assess and seek insights and 'root causes' contributing to disparities seen in application of this process. In the past year, the following efforts have contributed towards continued program improvement in this area:

- Ongoing data analysis and monitoring.
- Assessing and improving outreach methods.
- Implementation of a focused, instructor-led training on the topic of engagement and sanction. *In the last year, over 75% of CSD's staff who support WorkFirst attended this training.*

CSD also explored policy levers to improve outcomes for those impacted by sanction related policies, including the concept of eliminating sanction related terminations (full family sanctions) via agency request legislation. Effort also continues around advancing initiatives that improve family engagement outcomes including client-driven approaches and engagement tools.

Broader Efforts

The Suquamish Tribe implemented a Tribal TANF program this past year, joining 11 other Tribal TANF programs in Washington state. Tribal TANF programs create the opportunity for a tribe to offer a TANF program customized to the local needs of its community, providing culturally appropriate services.

RECOMMENDATIONS FOR CONSIDERATION

Allow all families who meet eligibility criteria continued access to assistance beyond 60 months.

Washington has no history of exceeding the federal 20% cap on federally funded TANF assistance delivered after 60-months of time on aid. As described in the ***Washington Policy and Practice Evolution Since 2019, Time Limit Policy Section*** above, when DSHS temporarily eliminated the TANF/SFA time limit during the COVID-19 pandemic, at no time was the 20% cap exceeded. The disparities in time limit extension practice found before, and now resurfacing with resumption of time limits, were eliminated during that time. Current time limit extension criteria may also contribute to potential disproportionality. For example, taking the disability time limit extension criteria, some racial and ethnic groups have less access to medical care which creates barriers to obtaining necessary documentation to support extending time on aid.³⁷

The pandemic response showed that **the simplest and most complete solution to eliminate disproportionality in time limit extension practice is for policy makers to consider functionally removing time limits from the program.** This could be done through statutory changes to expand extension criteria to encompass all families that reach their TANF time limit. Should approaching the federal cap become a risk, the state could commit state funds to support those extended on aid beyond the cap. As an alternative, a safety net approach could be explored

³⁷ There is extensive literature on racial inequities and access to health care, including [Key Data on Health and Health Care by Race and Ethnicity | KFF](#), [Understanding and Addressing Racial Disparities in Health Care - PMC \(nih.gov\)](#), [Racism and Health | Minority Health | CDC](#), [Reducing disparities in health care | Causes of health disparity | AMA \(ama-assn.org\)](#).

where families who reach 60 months on TANF/SFA and do not qualify for an extension continue to receive benefits for only children in the home.

Lengthen or eliminate TANF/SFA terminations related to sanction.

Federal law asserts that states must reduce **or** terminate TANF benefits for failure to comply with participation requirements. Washington state goes beyond the federal requirement by reducing **and** then terminating a family's cash benefit when the client does not comply with participation requirements.

To improve TANF access and reduce the likelihood of disproportionality in sanction closures, policy makers could consider **eliminating case terminations (full-family sanctions) due to non-compliance with WorkFirst participation requirements**. There is little evidence that sanctions assist families in leaving poverty³⁸, and there is clear evidence that the current Washington sanction policy has uneven impact.

If this approach is considered, the appropriate level of DSHS engagement and associated resources dedicated to sanctioned households must also be determined. Without capacity to provide support and ongoing outreach to offer these families access to services and activities, Washington could run risk of allowing particularly vulnerable families who may be facing extreme barriers and hardships (e.g. family violence, mental/emotional health challenges) to linger in sanction. A robust monthly contact/outreach approach would be ideal to ensure support is offered.

This type of approach could have some minor impact to Washington state's Work Participation Rate (WPR), which is the only current federal TANF measure that carries a penalty if not met. DSHS currently employs several strategies to avoid incurring these penalties. Provisions of the 2023 Fiscal Responsibility Act,³⁹ which take effect October 2025 impact how WPR targets are calculated and what populations are countable towards a state's achieved rate.⁴⁰ If eliminating WorkFirst sanction related benefit terminations was considered by policy makers as a means to eliminate program disparity, additional analyses would need to be conducted and provided by DSHS during the Legislative process to provide information on how this approach may impact the state's ability to achieve WPR targets.

In addition, **policy makers could consider reducing the financial penalty for sanctioned cases, to only the 'pro rata' federal minimum**, to mitigate the destabilizing force of sanction related grant reductions.

Continue dialogue with tribal leaders to improve service for American Indians/Native Alaskans.

Continue engagement and dialogue with DSHS's [Indian Policy Advisory Committee](#) around how sanction policy and process is impacting American Indians/Native Alaskans within Washington state. Leverage information gathered from analysis and ongoing monitoring efforts to support this dialogue and partner to develop additional strategies for how to support this population.

³⁸ [A Roadmap to Reducing Child Poverty | The National Academies Press](#)

³⁹ [Text - H.R.3746 - 118th Congress \(2023-2024\): Fiscal Responsibility Act of 2023 | Congress.gov | Library of Congress](#)

⁴⁰ For more information, see the [WorkFirst Maintenance of Effort and Work Participation Rate Report](#), published biannually.

✚ Explore offering additional, regular contact with TANF families to offer resource support and referrals.

Continue to explore whether additional, more regular staff outreach to TANF/SFA families should be offered to enable more timely referrals, help address barriers to employment, and assess and document whether a family may meet time limit extension criteria well ahead of reaching the TANF time limit⁴¹. This also supports families in avoiding the destabilizing effect of sanction, if/when participation is a challenge. This level of outreach would require additional staff time and clear staff guidance on purpose of this outreach. With this type of proactive engagement, CSD would not want lack of response from families to result in them entering the sanction pathway.

⁴¹ Staff currently contact clients at month 56-58 to assess for time limit extension.

APPENDIX A: LEGISLATIVE CHANGES TO TIME LIMIT AND SANCTION POLICY

Below is a list of legislative changes to TANF time limit and sanction policy since 2019, geared towards improving client access.

- [Second Substitute House Bill 1603](#) (Chapter 343, Laws of 2019), effective July 2019, ended the policy of permanently disqualifying a family after three sanction terminations and added homelessness to the hardship criteria for a time limit extension. As noted above, this policy is already helping Black/African American and American Indian/Native Alaskan populations access TANF.
- [Substitute House Bill 2441](#) (Chapter 338, Laws of 2020) effective July 2021, eliminated immediate terminations for non-compliance, allowed participants two months of non-compliance prior to grant reduction, and allowed an additional 10 months of non-compliance while receiving a reduced grant to provide opportunities to overcome barriers and reengage before required termination. This provides additional support for families and opportunities to resume engagement in WorkFirst participation.
- [Second Substitute Senate Bill 6478](#) (Chapter 320, Laws of 2020), effective July 2021, expanded the definition of homelessness to match that of the federal [McKinney-Vento Act](#). This expanded definition provides more opportunity for households to meet the criteria for a time limit extension.
- [Second Substitute Senate Bill 5214](#) (Chapter 239, Laws of 2021) effective July 2022, allowed additional time on aid for individuals who received TANF during the height of the COVID-19 pandemic, when the Washington unemployment rate was greater than or equal to 7%.
- [House Bill 1755](#) (Chapter 24, Laws of 2022) effective July 2023, allowed additional time on aid for individuals with over 60 months of TANF when the unemployment rate is 7% or higher, per the most recently published data available through the Employment Security Department.
- [2022 Supplemental Operating Budget: Engrossed Substitute Senate Bill 5693](#) (Chapter 297, Laws of 2022) effective July 1, 2022, through June 30, 2023, funded continued post-pandemic time limit extensions.
- [Second Substitute House Bill 1447](#) (Chapter 418, Laws of 2023) effective July 2023, removed the 60-month time limit for TANF households with an ineligible parent. Ineligible parents can continue to receive a TANF grant for their child as long as they meet financial eligibility criteria despite time on aid. Ineligible parents are defined as parents ineligible for TANF due to receipt of Supplemental Security Income (SSI), legal status or immigration status. It also expanded the definition of good cause reasons for failure to participate in the WorkFirst program to include any hardship(s) that reasonably prevent program participation, as defined by DSHS.
- [Substitute House Bill 2007](#) (Chapter 181, Laws of 2024) effective July 2024, allowed additional time on aid for individuals with a child under the age of two, who are eligible for the infant, toddler, or postpartum exemption.