

# PARTIAL SANCTIONS IN MARYLAND'S TEMPORARY CASH ASSISTANCE PROGRAM

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The U.S. Congress has largely avoided major policy changes to the Temporary Assistance for Needy Families (TANF) program since its inception in 1996 (Falk, 2024). Notable exceptions include the 2005 Deficit Reduction Act, which tightened work participation rules and revised how caseload reductions are determined for performance metrics. Similarly, the Fiscal Responsibility Act (FRA) of 2023 again adjusted the formula for caseload reductions and introduced additional work outcome measures.

Despite limited federal changes, states have broad discretion in operating their TANF programs and can update program policies to restrict access or enhance the program. Maryland's TANF program, known as Temporary Cash Assistance (TCA), has seen a flurry of policy changes in recent years, mostly driven by strong advocacy to enrich participant outcomes. For example, in July 2019, Maryland began passing through a portion of child support payments to TCA families (FIA, 2019a); additionally, the state introduced Transitional Support Services to address the benefit cliff (FIA, 2019b). In July 2020, adults were permitted to participate in vocational education activities for 2 years, an increase from the federal maximum of 1 year (FIA, 2020a). TCA families also began receiving an additional monthly benefit of \$45 per recipient in September 2022 (FIA, 2022d).

This is one of three briefs on four new TCA policies implemented in calendar years 2021 or 2022. These briefs will detail the percentage of the caseload impacted by the following policies:

- (1) the shift from full-family work and child support sanctions to partial sanctions;
- (2) a work exemption for adult recipients during their first 6 months of TCA benefits;
- (3) an expanded work exemption for single parents with a child under age 1; and
- (4) limitations on the use of work experience and community service to meet work requirements.

This brief examines TCA families who received a **partial sanction for non-compliance with work or child support requirements** and aims to highlight the impact of this recent TCA policy change on Maryland families.

## KEY FINDINGS

- ❖ Partial work (6%) and child support (3%) sanctions were rare.
- ❖ Families remained in work sanction status for a median of 5 months and 9 months in child support sanction status.
- ❖ Families' monthly TCA benefits were reduced by a median of nearly -\$50 for work sanctions and -\$180 for child support sanctions.

## During the 6 months after the sanction ended:

- ❖ Only 10% of families with an initial work sanction received a subsequent work sanction, and few (2%) families with an initial child support sanction received a subsequent one.
- ❖ Participation in work activities was low at 22% for work-sanctioned families and 14% for child support-sanctioned families.
- ❖ Most work-sanctioned (71%) and child support-sanctioned (82%) cases closed. About 40% of closures were due to failure to reapply for benefits.

## Data and Study Population

### *Data Sources*

Program participation data, including sanction status, were extracted from the Eligibility and Enrollment (E&E) system and its predecessor, the Client Automated Resources and Eligibility System (CARES). E&E and CARES are the administrative data systems for safety net programs managed by the Maryland Department of Human Services (DHS). CARES was operational between March 1998 and November 2021; the migration to E&E was fully completed in November 2021.<sup>1</sup> Both systems provide individual- and case-level participation data for the TCA program, the Supplemental Nutrition Assistance Program (SNAP), and other services as well as demographic data on participants.

Information on the types of work activities assigned to and completed by participants is provided by the Work Opportunities Record Keeping System (WORKS) system, which was developed in December 2006 by DHS to collect and report data related to federal work participation reporting requirements, provide DHS with information that can be used to monitor the results of local work programs, and provide local staff with information to manage and improve program operations

### *Study Population*

The study population includes every family who received TCA for at least one month in State Fiscal Year (SFY) 2023 (July 2022 to June 2023). There were 27,973 families who received at least one month of TCA in SFY 2023 including 24,429 adult recipients. From this caseload, the families who received a partial sanction during SFY 2023 were identified (n=2,434). Follow-up data for these families is extended through June 2024.

### *Data Analysis*

This report utilizes descriptive statistics to describe cases and adult recipients who participated in TCA, including percentages, medians, and averages. The average represents the total (e.g., all earnings) divided by the number of individuals included in the analysis. Median is sometimes a preferred representation of the data. The median is derived by arranging all values from lowest to highest and selecting the midpoint value. Extreme values do not affect the median, which can sometimes skew averages. This report examines population statistics and therefore does not include inferential statistics which are used to generalize sample findings to the population.

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<sup>1</sup> The transition to E&E resulted in some data inaccuracies. When we were able to identify data inaccuracies, we excluded analyses. Given the

transition to a new data system, there may be additional unknown data issues.

## Background on Sanctions

### NEW SANCTION POLICY

Prior to 2022, DHS employed full-family sanctions in which families' *TCA cases closed* due to non-compliance with work or child support requirements. In January 2022,\* DHS transitioned to partial sanctions so that families' *grants are now reduced* for non-compliance with work or child support requirements.

The financial penalty varies by the sanction:

- ❖ For **work sanctions**, the adult portion, representing 25% of the total grant, is reduced by 30%.
- ❖ For **child support sanctions**, the entire grant is reduced by 25%.

\*Partial child support sanctions were effective in December 2021 while partial work sanctions became effective in January 2022.

(FIA, 2021)

A major tenet of welfare reform was the promotion of employment to encourage financial self-sufficiency. To help adults obtain employment, federal law mandates that states require most adult recipients to participate in work-related activities such as job search, vocational education, or work experience. Federal program rules also require states to impose a financial penalty for adults who do not participate in work activities (Ensuring that Recipients Work, 1999). Further, states must meet their own work participation measures or may face a

financial penalty. Adhering to federal law, Maryland requires most single adults to participate in work-related activities for at least 30 hours per week; those with a child under the age of 6 years must participate for 20 hours per week (FIA, 2022b).

Additionally, two-adult households must participate in work-related activities for a combined minimum of 35 hours per week or for 55 hours per week if they receive a Child Care Scholarship for daycare (FIA, 2022b). Unless families have an exemption or good cause reason, non-compliance with work-related activities results in a financial penalty commonly known as a sanction.

States must also require families receiving cash assistance to cooperate with the public child support program to establish a child support case and order. They must also assign to the state their rights to any support paid while they are receiving TANF. States keep a portion of any child support payments and provide the remainder to the federal government to recoup the costs of TANF benefits. Some states, including Maryland, pass through some child support to families receiving TANF benefits in order to boost their incomes (National Conference of State Legislatures, 2023). In Maryland, any parent or caretaker relative receiving TCA who does not comply with child support requirements can have their TCA application denied, and non-cooperation after receiving TCA benefits results in a sanction (FIA 2022d).

### Sanctions in Maryland

From the onset of the TCA program in 1996, Maryland used full-family sanctions when an adult was found to be out of compliance with work or child support requirements. This means that TCA cases closed and all case members lost benefits when the adults

on these cases did not comply with those requirements. Once adults came into compliance, TCA cases could be reopened.

Full-family sanctions for non-cooperation with child support were never common in Maryland.<sup>2</sup> Work sanctions, on the other hand, were a primary tool to encourage compliance with work requirements. About 30% of all TCA case closures were due to a work sanction in each of the 10 federal fiscal years (FFY; October to September) between 2009 and 2018 (Gross & Nicoli, 2019). In fact, work sanction case closures peaked at 40% in FFY 2013.

While work sanctions were an important tool to ensure the state met its federal work participation rate goals, the immediate outcomes for families suggest these case closures may have exacerbated financial crises for these families. Adults on these cases were substantially less likely to be employed in the quarter when their cases closed as well as during the subsequent 6 months compared to cases that closed without a work sanction (Nicoli, 2016). Work sanctioned adults who did find employment earned 60% less than those without a work sanction (Nicoli, 2016). Consequently, families whose cases closed due to work sanctions were substantially more likely to return to the TCA program (Nicoli, 2016).

In 2020, Maryland's General Assembly passed a bill that reduced the sanction penalty from a case closure to a partial financial sanction for both work and child

support sanctions (FIA, 2021). This policy change allows families to maintain a portion of their cash benefit while also ensuring the state meets their federal obligations to impose a financial penalty when adults do not comply with TCA requirements. Under the revised policy, families' TCA benefits are partially reduced until they comply with requirements or a good cause exemption is identified. For a work sanction, the adult portion of the TCA benefit is reduced by 30%. For child support sanctions, the entire grant amount is reduced by 25%, the minimum required by federal law (Other Accountability Provisions, 1999). These partial sanctions went into effect in December 2021 for child support sanctions and January 2022 for work sanctions.<sup>3</sup>

## **Partial Sanctions among the SFY 2023 Caseload**

Following the change in policy, sanctions no longer appear to be a primary tool to encourage compliance with TCA's work requirements. The use of both work and child support sanctions declined dramatically between the transition from full-family sanctions to partial sanctions. The previous discussion describes sanctions under the old policy in which sanctions resulted in case closures. The percentages in Figure 1, however, represent the frequencies of sanctions among all families who received TCA in 2023, the first full year after the implementation of partial sanctions.

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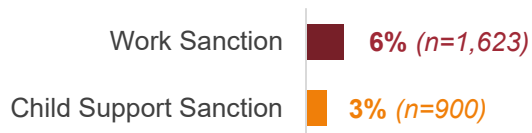
<sup>2</sup> While the percentage of closures due child support sanctions did increase over time, the percentage remained at 5% or less (Hall et al., 2015) with the exception of FFYs 2017 and 2018 when closures for child support sanctions reached 7% (Gross & Nicoli, 2019).

<sup>3</sup> Full-family sanctions were largely phased out beginning in March 2020 when Maryland suspended

work requirements due to the COVID-19 pandemic; when sanctions were reinstated, many families still qualified for a good cause exemption due to continued pandemic-related closures and illness (Zimmerman, 2021).

Only 6% of families receiving TCA benefits in SFY 2023 had a work sanction during the year. Similarly, only 3% of families had a child support sanction. This is in stark contrast with the prior use of full-family sanctions in Maryland.

**Figure 1. Percent of Cases with a Sanction in SFY 2023**



For a comparable percentage, the last full year in which full-family sanctions were implemented—SFY 2019—was examined, focusing on sanctions among families *receiving* benefits during that year (rather than among closures). One in every four (24%) families receiving TCA benefits were work sanctioned and had their cases closed for non-compliance with work requirements. About one in 10 (11%) families receiving TCA in SFY 2019 experienced a case closure due to a child support sanction (Schuyler et al., 2024). The transition to partial sanctions has reduced the frequency with which case managers impose these financial penalties. This may be the result of case managers lacking understanding of the

During the **last full year of full-family sanctions**, **24%** of families receiving TCA in SFY 2019 **closed for a work sanction**.

**One in 10 (11%)** families receiving TCA in SFY 2019 **closed for a child support sanction**.

new policy and how it should be implemented (Schuyler et al., 2024).

Families remain in sanction status with a reduced monthly benefit amount until they comply with work or child support requirements, an exemption or good cause reason has been identified, or their case is closed.<sup>4</sup> As shown in Figure 2, families with a work sanction remained in that status for a median of 5 consecutive months while those with a child support sanction remained in sanction status for a median of 9 consecutive months. Nearly two in five (36%) work sanctioned families remained in that status for just 1 to 3 months. Less than one in five (17%) families were in a work sanction status for more than 1 year. Conversely, nearly one in three (31%) families with a child support sanction remained in that status for more than 1 year.

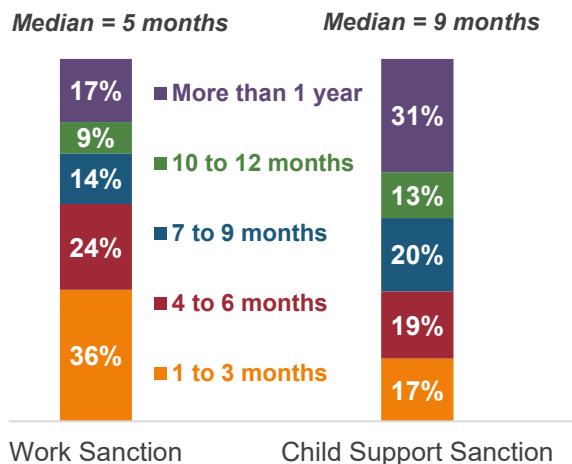
Sanctioned families may remain in sanction status for several months for various reasons. For instance, a family with a work sanction may be addressing crises that limit their ability to participate in an activity, and this barrier has not been identified by or shared with a case manager. For a family with a child support sanction, an adult may choose not to pursue a formal child support order because they fear for their safety,<sup>5</sup> they already receive informal support from the other parent, or they recognize that the other parent is unable to provide support (Office of Child Support Enforcement, 2016). For some families, the burden of compliance may be greater than a sanction

<sup>4</sup> While families' cases can no longer close due to a sanction, Maryland policy does permit case managers to close TCA cases if the adults do not comply with their Family Independence Plans which can include child support and work requirements (MD Human Svs Code § 5-311, 2013).

<sup>5</sup> Families are eligible to receive a good cause waiver for cooperation if there are issues of domestic/family violence (FIA, 2022c); however, these waivers appear to be issued inconsistently in Maryland (Schuyler et al., 2024).

penalty, and they may elect to receive a reduced grant amount and remain out of compliance.

**Figure 2. Consecutive Months in Sanction Status**



**Note:** Consecutive months are calculated from the beginning of the partial sanction, which could have occurred prior to SFY 2023, through the end date of the partial sanction or June 2024, whichever occurs first. Valid percentages are reported to account for missing data.

Policy dictates the reduction in the monthly TCA benefit amount when families receive a sanction. For work sanctions, only the adult portion, representing 25% of the entire grant, is reduced by 30%. This means that the entire grant is reduced by -7.5%.<sup>6</sup> In practice, the typical case experienced a -6%

reduction in their total TCA benefit amount. It is unclear why this reduction is lower than expected. It is possible that families may have other changes to their benefit amounts that impact the overall reduction. For example, families' benefits may be simultaneously adjusted for the addition of other family members to the case.

The reduction for child support sanctions is also lower than expected. According to policy, families' total grant amounts are reduced by -25%.<sup>7</sup> However, families with a child support sanction experienced a median -21% reduction in their monthly TCA benefits.

In more concrete terms, Table 1 provides the median monthly benefit amount that families lost due to sanctions. Among all work sanctioned families, the median reduction was -\$48 per month, and families with a child support sanction had a -\$181 reduction. This amount varies by the number of recipients on the case, however, since larger families receive a larger benefit amount. For a work-sanctioned family with two recipients, the benefit was reduced by a median of -\$43 and by -\$65 for families with four or more recipients. The child support sanction is steeper at a median reduction of -\$143 per month for a family with two

#### Median Percentage Change in TCA Monthly Benefit

Families' TCA benefit amounts declined by **-6%** when they received a **work sanction** and by **-21%** when they received a **child support sanction**.

<sup>6</sup> For example, if a family is receiving \$800 per month in TCA benefits, the adult portion is \$200 (i.e., 25% of \$800). The adult portion is then reduced by \$60 (i.e., 30% of \$200), and \$60 represents 7.5% of the total grant amount of \$800. This family's new monthly benefit is \$740 until the work-eligible adults comply with work requirements or a good cause waiver is identified.

<sup>7</sup> Using the previous example in footnote 6 and assuming a family with the same benefit amount received a child support sanction, this family's new benefit amount would be \$600 (i.e., reduced by \$200 or 25% of the \$800).

recipients and -\$237 reduction for families with four or more recipients.

Despite the larger reduction for child support sanctions, families tended to remain in sanction status for longer periods of time (Figure 2) compared to work-sanctioned families. It may be likely, then, that families face a real barrier to compliance with child support requirements and additional fact-finding may be necessary to address the barrier. To ensure families receive TANF benefits when needed, the federal Offices of Family Assistance (OFA) and Child Support Services (OCSS) recently encouraged states to implement flexibility for child support cooperation and good cause exemption policies (Gray & Flagg, 2025).

**Table 1. Median Decrease in the TCA Monthly Benefit Amount**

Number of Recipients	Work Sanctions	Child Support Sanctions
1 recipient	-\$24	-\$82
2 recipients	-\$43	-\$143
3 recipients	-\$54	-\$181
4 or more recipients	-\$65	-\$237
<b>All Cases</b>	<b>-\$48</b>	<b>-\$181</b>

**Note:** Valid percentages are reported to account for missing data.

## Short-term Outcomes after Sanctions End

The next set of analyses explore three major outcomes during the 6 months after a sanction ends, including if: (1) families received another sanction; (2) adults participated in a work-related activity or have been identified as having a barrier to participation; or (3) the families' cases closed. It is possible but rare (1%) for families to experience all three of these outcomes during the 6 months after the initial sanction ends. Hence, these analyses explore each outcome independently.

### *Subsequent Conciliations or Sanctions*

Before families receive a sanction, case managers must provide a 30-day conciliation period (FIA, 2021). This allows adults to comply with requirements before the sanction is issued or for case managers to identify any good cause reasons to exempt the family from the requirement. After their initial sanction, it was not common for families to receive subsequent conciliation periods nor subsequent sanctions. As shown in Figure 3, only 9% of families with an initial work sanction in SFY 2023—that is, the families identified in Figure 1 who also have 6 months of follow-up data—received an additional 30-day

conciliation period. Additionally, only 10% of work-sanctioned families received another work sanction, and 2% received a child support sanction during the 6 months after the initial work sanction ended.

### OUTCOMES AFTER SANCTIONS

The next set of analyses examine outcomes in the 6 months after the sanction spell (i.e., consecutive months in sanction status) through June 2024. **Only cases that have at least 6 months between the sanction end date and June 2024 are included in these analyses.** Most (86%) SFY 2023 cases with a work (1,393 of 1,623 cases) or child support sanction (771 of 900 cases) have at least 6 months of follow-up data.

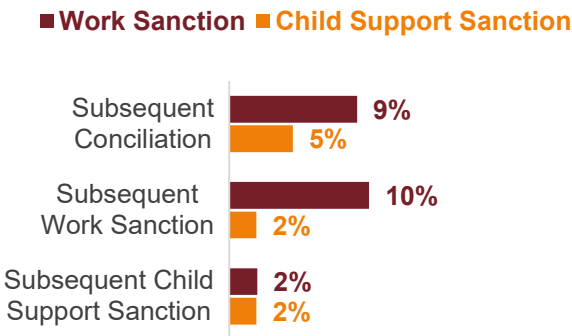
It should be noted that the percentage with a subsequent work sanction exceeds the percentage with a subsequent conciliation period (10% vs. 9%). Based on policy, a conciliation period should always precede a sanction. The lack of a conciliation period may be based on data errors; however, it is likely that some families did not receive a subsequent conciliation period before the reinstatement of a sanction. This disconnect may be a result of case managers transitioning to this new policy; hence, it is important to ensure that case managers are aware of the 30-day conciliation period before issuing *each* sanction. Certainly, this may indicate an area in which additional training is necessary.

Each time customers are not compliant with work and child support requirements, they are provided a 30-day **conciliation** period. This allows the customer to either come into compliance before they are sanctioned or to provide a good cause reason for non-compliance.

Very few families whose child support sanction ended faced additional conciliations or sanctions. Just 5% of SFY 2023 families with an initial child support sanction and 6 months of follow-up data had a 30-day conciliation period, and only 2% received a subsequent child support sanction. Few (2%) of these families received a work sanction in the 6 months after their child support sanction ended.

<sup>8</sup> Although there may be some families who are work-exempt—that is, not required to participate in work-related activities—there was minimal, if any, difference in outcomes when excluding those cases. Additionally, families with child support sanctions are included in this outcome, although they may have

**Figure 3. Subsequent Conciliations and Sanctions**  
During the 6 months after sanction end date



**Note:** Only cases that have 6 months between the sanction end date and June 2024 are included.

**Interpretation example:** Among the 1,393 cases in SFY 2023 with a work sanction and 6 months of follow-up data, 9% had a 30-day conciliation during the 6 months after the initial work sanction ended; additionally, 10% had another work sanction and 2% had a child support sanction during those 6 months after the initial work sanction ended.

### Participation in Work-related Activities or Assignment to Barrier Codes

Most adult recipients are required to participate in a work-related activity. Hence, another outcome during the 6 months after the sanction ended is participation in a work-related activity or the identification of a barrier that prohibits participation in an activity.<sup>8</sup> However, as shown in Figure 4, participation in work-related activities was low.

Barrier codes represent reasons that adults are unable to fully participate in work activities. Barriers can range from childcare and transportation challenges to domestic violence or disabilities.

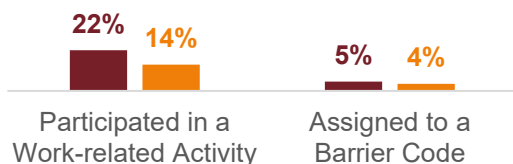
already met work requirements before the child support sanction ended. On the other hand, work sanctions are intended to encourage participation in a work-related activity, so activity participation would be a successful outcome.

Among families with a work sanction, about one in five (22%) participated in a work-related activity in the 6 months after the sanction ended, and few (5%) were assigned to a barrier code indicating a reason the adults could not fully participate in a work activity. According to Figure 5, the most common activity in which adults participated during the following 6 months was employment. Two thirds (66%) of work sanctioned adults who participated in an activity were employed at some point in the 6 months after the sanction ended. Additionally, two in five (40%) work-sanctioned adults who participated in an activity were placed in a job search activity.

Among families with a child support sanction, just over one in 10 (14%) participated in a work-related activity while 4% were assigned to a barrier code. Among those participating in a work-related activity, employment was also the most common activity in the following 6 months, accounting for 80% of these families. Participation in job search (16%) and vocational education or job training (15%) were the next most common activities.

**Figure 4. Participation in Work-related Activities or Assignment to Barrier Codes**  
During the 6 months after sanction end date

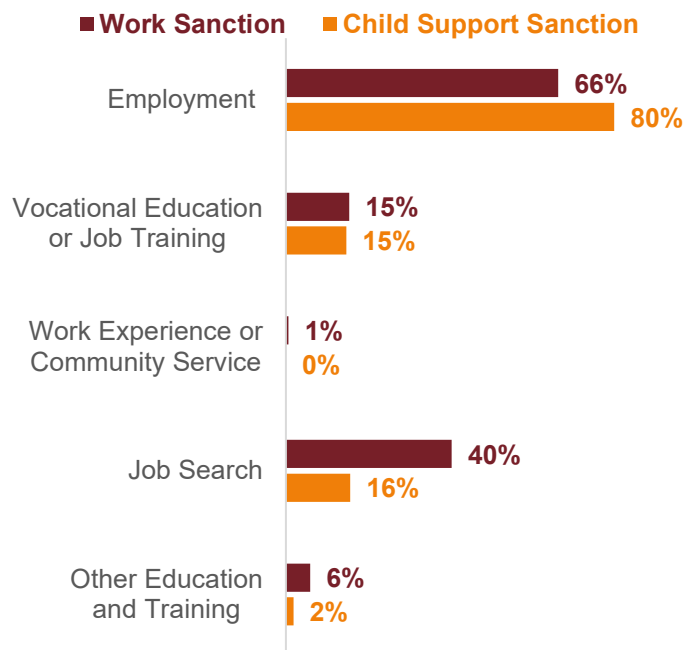
■ Work Sanction ■ Child Support Sanction



**Note:** Only cases that have 6 months between the sanction end date and June 2024 are included.

**Figure 5. Participation in Work-related Activities**

During the 6 months after sanction end date



**Note:** Includes adults who participated in a work-related activity (see Figure 4). Adults may participate in multiple activities throughout the 6-month follow-up period so percentages may not sum to 100%.

#### ACTIVITY DESCRIPTIONS

**Employment:** unsubsidized or subsidized jobs

**Vocational education or job training:** education program, on-the-job training, self-employment training

**Job search:** resume development, job applications, and interviews

**Work experience or community service:** unpaid placements designed to prepare participants for employment

**Other education and training:** secondary education/GED, adult basic education, English as a second language, job skills training

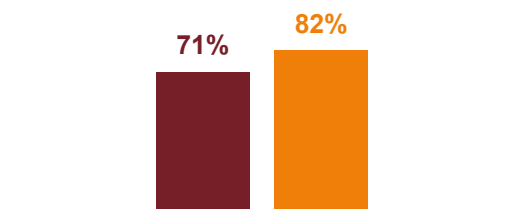
## Case Closure

Case closure is the final outcome examined in this brief. This is the most common outcome for sanctioned families. Seven in 10 (71%) work-sanctioned families and eight in 10 (82%) child support-sanctioned families had a case closure at some point during the 6 months after their sanction ended. These case closures could have occurred at (a) the beginning of the follow-up period, which caused the sanction to end, or (b) the cases could have closed in a later month after the family complied with requirements or identified an exemption.

**Figure 6. Percentage of Cases that Closed**

*During the 6 months after sanction end date*

■ Work Sanction ■ Child Support Sanction



**Note:** Only cases that have 6 months between the sanction end date and June 2024 are included.

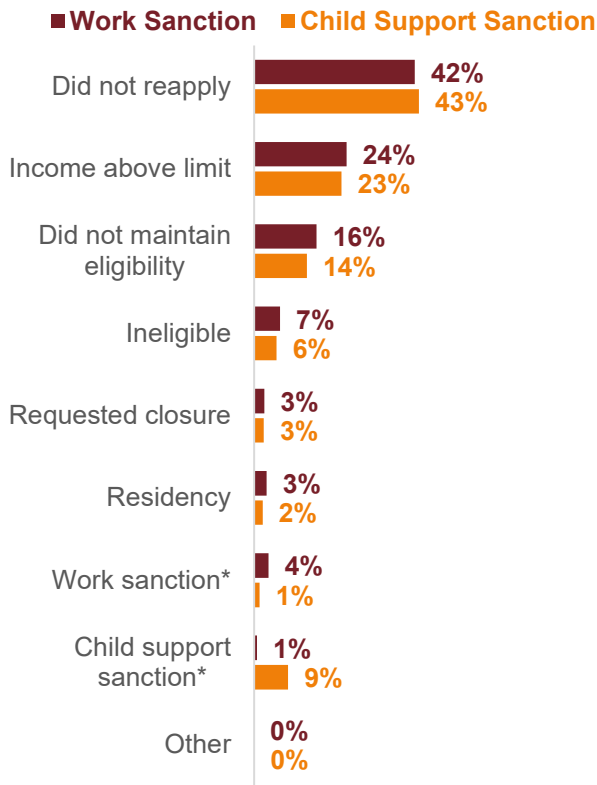
The reasons for case closure were similar between both sanction types, as shown in Figure 7. Two in five work (42%) and child support (43%) sanctioned families had a case closure because they did not reapply for benefits or complete the redetermination process to recertify their benefits. Families may not reapply for benefits for several reasons such as the administrative burden of submitting paperwork or lack of awareness about the need to reapply; many families may reapply once they realize they

have lost their benefits (Mills et al., 2014; Rosenbaum, 2015).

Families with a sanction experienced a case closure due to the redetermination process more often than all families exiting the TCA program. Among cases that closed between January 2022 and June 2023, just under one third (31%) closed due to the redetermination process (Smith et al., 2024). Hence, the percentage of sanctioned families whose cases closed at redetermination is more than 10 percentage points higher than the general population of TCA leavers.

About one quarter of work (24%) and child support (23%) sanctioned families experienced a case closure because their income exceeded the eligibility threshold. This may happen when adults obtain employment or receive unearned income such as child support payments or unemployment insurance benefits. Exceeding the income threshold among sanctioned cases was comparable to the general population of TCA leavers (27%) (Smith et al., 2024). The third most common case closure reason for work (16%) and child support (14%) sanctioned families was due to not maintaining eligibility with program requirements such as complying with their Family Independence Plans. This reason was slightly less common for sanctioned families than among the general population of TCA leavers at 22% (Smith et al., 2024).

**Figure 7. Case Closure Reasons**  
*During the 6 months after sanction end date*



**Note:** Includes cases that closed (see Figure 6). Cases can be closed for multiple reasons; as a result, percentages may not sum to 100%.

**CASE CLOSURE DESCRIPTIONS**

- Income above limit:** Family’s earned income and/or unearned income exceeded eligibility threshold
  - Did not maintain eligibility:** Family did not submit required information regarding eligibility or did not comply with the eligibility process such as compliance with their Family Independence Plan
  - Did not reapply:** Family did not recertify their eligibility for TCA when required, did not provide all documentation to recertify benefits, or missed the redetermination appointment
  - Ineligible:** Family no longer met technical eligibility, such as a deceased head of household or no dependent children
  - Requested closure:** Family requested to discontinue TCA benefits
  - Residency:** Family no longer resides in Maryland, or their residency is unknown
  - Work sanction\*:** Adult recipient did not comply with work requirements
  - Child support sanction\*:** Adult did not comply with child support requirements
- \* Based on a limited case record review, there was a potential administrative data system error that suppressed the actual case closure code in the system. Case record reviews for all cases could not be conducted; therefore, cases are still listed as sanction closures although these are likely system errors, and families’ cases closed for other reasons.*

## Conclusions

In 2022, Maryland transitioned away from full-family sanctions, which resulted in the loss of benefits for all family members, to partial financial sanctions for adults who do not comply with work and child support requirements. This policy change prioritizes family well-being while also encouraging compliance with federal TANF rules. In particular, this ensures that children do not bear the consequences when adults are out of compliance.

The use of sanctions has declined substantially under this transition. Only 6% of the families receiving TCA benefits in SFY 2023 received a partial financial penalty for not meeting work requirements, compared to 24% of families in SFY 2019 who faced full-family sanctions. Similarly, only 3% of families in SFY 2023 had child support sanctions, compared to 11% of SFY 2019 families.

Despite the higher financial penalties for child support sanctions, families remained in child support sanction status longer than those with a work sanction (median of 9 months vs. 5 months). This difference may be related to varying redetermination periods. Specifically, if a family's sanction spell ends with a redetermination case closure and families with work sanctions

have shorter redetermination periods (FIA, 2022a), then those families would have shorter sanction spells. This is certainly a possibility given that case closure was the most common outcome for sanctioned families, and the lack of a redetermination was the most common closure reason.

While the new sanction policy has immediate benefits to families, additional research is necessary. First, families are more likely to be denied benefits at application due to lack of child support cooperation (Zimmerman, 2025). This may mean that more families' financial needs go unmet even if there are valid reasons for non-cooperation. Second, further research is needed to determine if adults who receive partial sanctions have better employment outcomes compared to those who previously received full-family sanctions.

Sanctioned families now keep some of their cash benefit to assist in their financial needs while addressing any crises or barriers that led families to seek cash assistance. Ideally, this additional time on the TCA program allows adults to find jobs with earnings comparable to those who were not sanctioned. Future research is crucial for policymakers and program managers to ensure the new sanction policy meets program goals and supports family well-being.

## References

- Ensuring that Recipients Work, 261 C.F.R. §45 (1999). <https://www.ecfr.gov/current/title-45/part-261>
- Falk, G. (2024). *The Temporary Assistance for Needy Families (TANF) block grant: A legislative history*. Congressional Research Service. <https://crsreports.congress.gov/product/pdf/R/R44668>
- Family Investment Administration. (2019a, July 1). *Child support pass-through initiative* (Control No. 19-19) [Action Transmittal]. Maryland Department of Human Services. <https://dhs.maryland.gov/business-center/documents/fia/>
- Family Investment Administration. (2019b, July 1). *Transitional Support Services (TSS)* (Control No. 19-18) [Action Transmittal]. Maryland Department of Human Services. <https://dhs.maryland.gov/business-center/documents/fia/>
- Family Investment Administration. (2020a, June 29). *TCA vocational educational engagement extension to 24 months* (Control No. 21-01) [Action Transmittal]. Maryland Department of Human Services. <https://dhs.maryland.gov/business-center/documents/fia/>
- Family Investment Administration. (2021, December 14). *HB1313 – Temporary Cash Assistance – work and child support sanction requirements* (Control No. 21-19 Amended) [Information Memo]. Maryland Department of Human Services. <https://dhs.maryland.gov/business-center/documents/fia/>
- Family Investment Administration. (2022a). *Temporary Cash Assistance manual: Application 214*. Maryland Department of Human Services. <https://dhs.maryland.gov/business-center/documents/fia/>
- Family Investment Administration. (2022b). *Temporary Cash Assistance manual: Basic requirements work & education 401*. Maryland Department of Human Services. <https://dhs.maryland.gov/business-center/documents/fia/>
- Family Investment Administration. (2022c). *Temporary Cash Assistance manual: Child support*. Maryland Department of Human Services. <https://dhs.maryland.gov/business-center/documents/fia/>
- Family Investment Administration. (2022d, September 1). *Temporary Cash Assistance (TCA), Temporary Disability Assistance Program (TDAP) benefit decrease* (Control No. 22-31) [Information Memo]. Maryland Department of Human Services. <https://dhs.maryland.gov/business-center/documents/fia/>
- Gray, T., & Flagg, A. (2025). *ACF "Dear Colleague" letter on state TANF and child support cooperation flexibilities*. U.S. Department of Health & Human Services, Administration for Children & Families, Office of Child Support Services & Office of Family Assistance. <https://www.acf.hhs.gov/ofa/policy-guidance/acf-dear-colleague-letter-state-tanf-and-child-support-cooperation>
- Gross, A., & Nicoli, L. T. (2019). *Caseload exits at the local level: October 2017 through September 2018*. University of Maryland School of Social Work. <https://www.ssw.umaryland.edu/media/ssw/fwrtg/welfare-research/caseload-exits/macro22.pdf>
- Hall, L. A., Passarella, L. L., & Nicoli, L. T. (2015). *Welfare cases with child support sanctions: Characteristics and outcomes*. University of Maryland School of Social Work. <https://www.ssw.umaryland.edu/media/ssw/fwrtg/welfare-research/sanctions/CSsanctions.pdf>
- Md. Code Ann., Human Services § 5-311. (2013). <https://law.justia.com/codes/maryland/2013/article-ghu/section-5-311/>
- Mills, G., Vericker, T., Koball, H., Lippold, K., Wheaton, L., & Elkin, S. (2014). *Understanding the rates, causes, and costs of churning in the Supplemental Nutrition Assistance Program (SNAP) – Final Report*. United States Department of Agriculture, Food and Nutrition Service. <https://fns-prod.azureedge.us/sites/default/files/ops/SNAPChurning.pdf>

- Rosenbaum, D. (2015). *Lessons churned: Measuring the impact of churn in health and human services programs on participants and state and local agencies*. Center on Budget and Policy Priorities. <https://www.cbpp.org/research/lessons-churned-measuring-the-impact-of-churn-in-health-and-human-services-programs-on>
- National Conference of State Legislatures. (2023). *Child support pass-through and disregard policies for public assistance recipients*. <https://www.ncsl.org/human-services/child-support-pass-through-and-disregard-policies-for-public-assistance-recipients>
- Nicoli, L. T. (2016). *Are welfare recipients with the most severe work sanctions particularly disadvantaged?*. University of Maryland School of Social Work. <https://www.ssw.umaryland.edu/media/ssw/fwrtg/welfare-research/sanctions/sanctionscharacteristics.pdf>
- Office of Child Support Enforcement. (2016). *Why don't more poor custodial parents have a child support order?*. U.S. Department of Health and Human Services, Administration for Children & Families. [https://www.acf.hhs.gov/sites/default/files/documents/ocse/why\\_dont\\_more\\_poor\\_cps\\_have\\_a\\_cs\\_order\\_sbthn\\_6.pdf](https://www.acf.hhs.gov/sites/default/files/documents/ocse/why_dont_more_poor_cps_have_a_cs_order_sbthn_6.pdf)
- Other Accountability Provisions, 264 C.F.R. §45 (1999). <https://www.ecfr.gov/current/title-45/part-264>
- Schuyler, L.A., Garcia, K., Smith, H., & Passarella, L.L. (2024). *Maryland's TANF program: A comprehensive review*. University of Maryland School of Social Work. <https://www.ssw.umaryland.edu/media/ssw/fwrtg/welfare-research/comprehensive-tca-review/ComprehensiveTCAReview2024.pdf>
- Smith, H., Schuyler, L.A., & Passarella, L.L. (2024). *Life after welfare: 2024 annual update*. University of Maryland School of Social Work. <https://www.ssw.umaryland.edu/media/ssw/fwrtg/welfare-research/life-after-welfare/Life-after-Welfare,-2024.pdf>
- Zimmerman, T. (2025). *Analysis of the FY 2026 Maryland executive budget, 2021, N00I00 Family Investment Administration, Department of Human Services*. Maryland General Assembly. <https://mgaleg.maryland.gov/Pubs/BudgetFiscal/2026fy-budget-docs-operating-N00I00-DHS-Family-Investment.pdf>
- Zimmerman, T. (2021). *Analysis of the FY 2022 Maryland executive budget, 2021, N00I00 Family Investment Administration, Department of Human Services*. Maryland General Assembly. <https://mgaleg.maryland.gov/Pubs/BudgetFiscal/2022fy-budget-docs-operating-N00I00-DHS-Family-Investment.pdf>

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