



April 17, 2020

RE: PROVISIONS FOR A COVID 4 BILL

Dear Member of Congress:

As the coronavirus pandemic continues, the National Association of County Human Services Administrators (NACHSA) urges you to invest in a number of human services, nutrition, health and homelessness programs to support families.

An affiliate of the National Association of Counties, NACHSA represents human services directors who often administer income assistance and social services programs, including the Temporary Assistance for Needy Families program (TANF), the Supplemental Nutrition Assistance Program (SNAP) child welfare and adult protective services. Counties are also often responsible for older Americans programs and services for persons experiencing homelessness. Our requests follow.

PROGRAM FUNDING

Increase the SNAP Benefit by 15 Percent: NACHSA supports a 15 percent increase in the maximum Supplemental Nutrition Assistance Program (SNAP) benefit. The increase should continue until economic conditions improve, with the enhanced benefit tied to a reduction in the unemployment rate and/or other labor market factors approximating pre-public health emergency levels. With the average SNAP benefit amounting to about \$1.40 per person per meal, program benefits are typically exhausted well before the end of the month. Food banks are unable to fill in the gaps, as they face severe challenges in meeting the mounting needs of unemployed and low-income households during the crisis.

Increase Minimum SNAP Benefit: NACHSA also supports an increase in the monthly minimum benefit from \$16 per month to \$30. The minimum benefit would further support low-income seniors and persons with disabilities who often receive Supplemental Security Income.

Increase the Social Services Block Grant: NACHSA supports \$4.1 billion in supplemental funding for the Social Services Block Grant (SSBG) to provide states and counties with additional, flexible sources of federal support to address locally-identified needs. SSBG

funds are often used to bolster adult protective services and child welfare programs, both of which provide support for individuals who are especially vulnerable during a crisis. SSBG increases have been successful in the past to help communities recovering from natural disasters such as Katrina.

Increase TANF Funding: Temporary Assistance for Needy Families (TANF) caseloads are expected to increase due to the economic fallout of the COVID-19 pandemic. Block grant funding remains at the same level as when the program was enacted in 1996. NACHSA supports establishing an emergency contingency fund for the program, with funding tied to proportionate TANF caseload growth and the current state and county investment in the program. A similar investment was made in the 2009 *American Recovery and Reinvestment Act*.

Increase Federal Match for Medicaid and Foster Care: NACHSA supported the 6.2 percentage point increase in the federal match for Medicaid and Title IV-E foster care in the *Families First Coronavirus Response Act* (PL 116-127). However, as unemployment skyrockets, it will place further stress on county health and human services systems. Similarly, as families lose their health insurance coverage, more will become eligible for Medicaid. These financial stresses will also increase pressures on our child welfare and foster care system to protect children and support families in crisis. Consequently, we support the bipartisan National Governors Association request to increase the temporary Medicaid and Title IV-E match to 12 percentage points.

Increase Child Welfare Funding: NACHSA supports increases in Title IV-B and *Child Abuse Prevention and Treatment Act* (CAPTA) funding. These funds would ensure that our county child protection systems can adapt and respond quickly to reports of child abuse and address barriers to ordinary service delivery during and after the pandemic. Increased funding will ensure that the child protection workforce has the necessary technological and protective resources to continue to serve children and their families.

When the pandemic subsidies and shelter-in-place orders are lifted, our staff will need to respond to child maltreatment cases which were not reported earlier. Court delays and delays in family reunification will also result in additional staff time in courts and with families to support reunification and other permanency efforts.

Invest in Adult Protective Services: The *Elder Justice Act* became law in 2010, but Congress has never appropriated the authorized funding to support the front-line efforts of state and county adult protective services (APS) programs. Counties are very concerned that reports of APS cases will spike, especially after the pandemic. At a minimum, Congress must appropriate the \$100 million authorized under the law. Unlike child welfare, the federal government has never been a financial partner with state and county governments in supporting the direct delivery of APS. Given the growing population of older Americans, and the economic stressors emanating from the

pandemic, federal funding must be appropriated for APS to bolster vital services to ensure seniors and dependent adults are protected from neglect and exploitation.

Protect and Support Essential Human Services Workers: NACHSA joins other associations, including the American Public Human Services Association and the Child Welfare League of America, in urging increased federal attention and support for county workers protecting and serving children and vulnerable adults. Those workers must be included in any federal funding prioritizing first responders. While most States have, in general, listed these front-line providers as essential, our county agencies continue to lack sufficient personal protective equipment (PPE) for our workers to safely make in-home visits or to protect residents and staff in residential facilities.

Given the risks to their health and well-being, NACHSA also supports federal appropriations for hazard pay to front-line human services workers, including child welfare staff working in protection, prevention, foster care, and detention, and staff serving persons with disabilities and protecting vulnerable adults. Since the end of the pandemic is uncertain, hazard pay may help to retain and recruit essential human services workers through the duration of an extremely stressful time.

Increase Homeless Assistance Grants: NACHSA supported the \$4 billion Emergency Solutions Grant (ESG) funding in the *CARES Act* (PL 116-136) to help address persons at risk or who are experiencing homelessness. Given the vulnerabilities of individuals and families without shelter or who are living in congregate shelters during and after COVID-19, NACHSA supports additional increases in funding for HUD's Homeless Assistance Grants, which fund core homelessness programs, including the Continuum of Care (CoC) program and the ESG program.

ADMINISTRATIVE FLEXIBILITY

Grant Federal Flexibility and Waive Administrative Penalties: Given the unprecedented circumstances faced by county eligibility workers and individuals applying for assistance, NACHSA supports provisions waiving fiscal penalties for administrative errors made during the public health emergency in federal programs including TANF, SNAP, Medicaid, child welfare and the child support program. NACHSA supports the provisions in the *Take Responsibility for Workers and Families Act* (HR 6379) which recognize those concerns by waiving penalties for child support (Sec. 60003) and TANF (Sec. 60004).

Additionally, NACHSA supports waiving any sanctions and 'stopping the clock' on participants' program participation requirements during the public health emergency, similar to the provisions in the *Responsibility for Workers and Families Act* (Sec. 60004).

Increase Flexibility in Meeting Child Welfare Needs: NACHSA supports providing states the option to meet the *Child and Family Services Improvement and Innovation Act's* monthly in-person visit requirements with youth in the child welfare system through

electronic means whereby the caseworker would make both visual and auditory contact with the foster child. This provision and other child welfare flexibilities supported by NACHSA are included in the *Take Responsibility for Workers and Families Act* (HR 6379) under Sec. 60001: "Continued Safe Operation of Child Welfare Programs and Support for Older Foster Youth."

Stop Implementation of SNAP and Medicaid Regulations: NACHSA previously submitted comments opposing the Administration's proposed rules to reduce SNAP eligibility and benefits. We welcomed the provision in the *Families First Coronavirus Response Act* (PL 116-127) which delayed implementation of the Able Bodied Adults Without Dependents rule. We also urge a similar delay on issuing a final rule on the proposed Categorical Eligibility regulations.

Similarly, NACHSA submitted comments opposing the Medicaid Fiscal Accountability Rule (MFAR), which would make significant changes to the methods states and counties use to finance the non-federal share of Medicaid. NACHSA supports delaying or prohibiting the implementation of a final rule. MFAR could destabilize the financial underpinnings of states' Medicaid programs at exactly the time when our systems are responding to the COVID-19 pandemic and will see increases in enrollment due to the huge numbers of unemployed individuals.

Thank you for considering our views.

Sincerely,



Claudia Tuck
President, NACHSA
Director, Human Services
Alachua County, Florida