Caught in the Gaps

How the pitfalls of cash assistance programs perpetuate economic insecurity for New Yorkers

FPWA

About FPWA

FPWA is an anti-poverty policy and advocacy organization committed to advancing economic opportunity, justice, and upward mobility for New Yorkers with low incomes. Since 1922, FPWA has driven groundbreaking policy reforms to better serve those in need. We work to dismantle the systemic barriers that impede economic security and well-being, and strengthen the capacity of human services agencies and faith organizations so New Yorkers with lower incomes can thrive and live with dignity.

Acknowledgements

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Executive Summary

New York State is emerging from the Covid-19 pandemic, a public health crisis that has taken the lives of more than 70,000 New Yorkers and exacerbated long-standing economic, racial, and gender inequities in our city, state, and country.[1] Communities of color were hit hardest from the very start of the pandemic: In the first three months of the crisis, when New York City was the nation's epicenter, the city's Black and Hispanic residents were twice as likely to die from the virus as white individuals. This disparity was even starker in the rest of the state, where the fatality rate was four times greater for Black residents and more than 3.5 times greater for Hispanic residents than white residents.[2] As the pandemic continued, so too did these disparities, with more recent data indicating that New Yorkers of color have experienced a disproportionate share of cases and deaths from Covid-19.[3] Communities of color were also hit hardest by the resulting economic crisis. Black-owned businesses, for instance, closed at a higher rate than white-owned businesses, and people of color faced significantly higher rates of unemployment.[4] [5]

In times of economic distress—whether the consequence of an extraordinary collective event like the pandemic or a personal setback like a job loss or illness—individuals and families across the nation turn to public benefits for assistance. Still others rely on benefit programs to help them cope with long-term circumstances such as a disability. All told, one in five people receive means-tested benefits in an average month, and studies show that the majority of people in the U.S. have used such benefits at some point in their lifetime.[6] [7] These programs both reduce economic hardship and mitigate racial and ethnic disparities.[8] At the same time, however, they have many structural flaws that limit their reach and effectiveness.

Benefits became key to supporting New Yorkers who endured extreme economic hardship during the pandemic, and enrollment in programs such as the Supplemental Nutrition Assistance Program (SNAP), Medicaid, and cash assistance increased as a result.[9] [10] Yet at the same time, the pandemic brought into high relief the continued inadequacy of the benefits system as it exists today. A myriad of issues, many of which we explore in this report, cause benefits programs to be underfunded, overly complex, and governed by outdated thresholds that restrict eligibility and limit the amount of assistance that programs provide. Consequently, benefits do not reach all those who need them, and for those who *do* receive assistance, benefits are not enough to cover even their most basic needs. These are entrenched structural failings that transcend Covid-19. Thus, if the city and state are to make an equitable recovery from the pandemic, it is critical that we remedy the existing limitations of the benefits system.

One key component of our current benefits system in New York State is cash assistance funded through the Temporary Assistance for Needy Families (TANF) federal block grant, a 26-year-old program designed to fund short- and long-term cash assistance and other supports for low-income families with children.[11] New York families in deep poverty may be eligible for TANF-funded cash assistance through the state's Family Assistance (FA) program if they satisfy strict income, resource, and other eligibility rules, including work requirements and durational limits. The state and counties also fund the Safety Net Assistance (SNA) program, which provides cash assistance to those who are not eligible for FA but meet strict eligibility rules.

In this report, we offer an analysis of the various ways that these cash assistance programs—though they provide critical aid in the short-term—fail to offer a path to long-term economic stability for individuals and families. We then provide a roadmap for addressing the most prominent gaps in these programs and ensuring dignity, fairness, and opportunity for all recipients. While focusing on FA and SNA in this iteration of our work, we continue to ground our analysis in our broader vision for transformative change of the benefits system, which will require redesigning it to ensure that racial, gender, and economic equity are at its center.

This work is rooted in our longstanding advocacy of a more equitable city and state. True economic justice will require change that enables all New Yorkers to meet their basic needs, to weather financial storms, and to build a secure financial future. A strong system of income supports is one key component of this vision. This work also necessarily centers on racial and gender justice. Though people of all races access benefits, it is people of color who face increased barriers to economic security stemming from unequal access to quality education, jobs, housing, and other opportunities. Women of color also face interlocking systems of sexism and racism that magnify inequities in the design of the benefits system.

We know that simply reforming these programs—or even reforming the benefits system as a whole—is not enough to end poverty or economic hardship. Thus, the recommendations put forth in this report also center on other important structural changes that must work in tandem with a strong benefits system. These include policies ranging from investing in affordable housing and child care to ending the use of the outdated Federal Poverty Level, a measure that deliberately undercounts poverty and consequently limits eligibility for benefits programs. Taken together, the recommendations in this report can help create a *real* path to economic security and mobility for all New Yorkers.

Introduction

FPWA began this work as a result of our analysis of benefits cliffs in New York State, which culminated in our 2021 report, *Pushed to the Precipice: How Benefits Cliffs and Financial Gaps Undermine the Safety Net for New Yorkers*. Benefits cliffs refer to the point at which an increase in income triggers the sudden loss of benefits, resulting in a net loss of income. Although our analysis revealed only one cliff, in the state's child care subsidy program, stakeholders we engaged made it clear that benefits cliffs are not the only way in which the system fails to offer a reliable path to economic stability. Instead, we found that many of the troubling issues surrounding the benefits system were not necessarily "cliffs" but rather broader "gaps" between need and benefits created by issues such as restrictive eligibility thresholds, administrative barriers, and the system's overall failure to provide recipients with enough assistance to meet their needs. Thus, we decided to broaden our focus to these "financial gaps," using a framework developed by researchers at the Center for Social Policy at the University of Massachusetts Boston.[12] The framework provided us with language to better describe these broader issues, and the three gaps identified by the researchers—eligibility, coverage, and hardship—offer a more comprehensive understanding of the drivers of the financial instability that concerned us and the many experts we engaged. We offered a brief analysis of these gaps in *Pushed to the Precipice*. In this second report, we explore New York's cash assistance programs, Family Assistance and Safety Net Assistance, through the financial gaps framework.

We focused our analysis on New York's cash assistance programs for several reasons. First, after conducting a comprehensive literature review and interviewing experts, including some FPWA member organizations, we identified the most prevalent gaps in benefit programs and found that all are present in FA and SNA. Moreover, both of these programs are entwined with broader questions that are at the heart of our work. Eligibility for FA and SNA is targeted to individuals and families with the lowest incomes, and as an anti-poverty organization, highlighting policy issues specific to this population is a critically important part of our mission. Equally relevant is the problematic history of the federal funding mechanism that in part governs the cash assistance programs. The TANF block grant was established in 1996 by the Personal Responsibility and Work Opportunity and Reconciliation Act (PRWORA), whose design and stated goals were explicitly rooted in racism and sexism and reflected harmful, paternalistic narratives about people who access benefits.[13] Consequently, TANF has historically been stigmatized in political discourse and used as a tool to perpetuate racist tropes about people of color, particularly Black women.[14] As an organization committed to economic and racial equity, it is critical for FPWA to be part of the conversation around how systemic racism shows up in the benefits system. It is also critical to address the shame and stigma that these narratives and policies have caused and reframe the conversation to focus on equity and what New Yorkers with low incomes deserve.

FPWA has a long history of work on cash assistance, providing us with the substantial background and long perspective that informs this report:

- **In the 1980s, FPWA successfully advocated for an increase in the cash assistance grant in the program that predated TANF, and the organization continued to press for further increases in the years that followed.[15] FPWA also founded the Economic Justice and Social Welfare Network (EJSWN) coalition in 1989, which promoted an adequate and accessible benefits system.**
- **In the early 1990s, FPWA spearheaded the Welfare Reform Network (WRN), a statewide coalition of 1,000 individuals and organizations who fought against moves to cut funding for benefits.[16] In 1997, after the passage of PRWORA, FPWA mobilized the WRN to prevent the implementation of "draconian cuts in benefits."[17]**
- **In the 2000s, FPWA successfully advocated for the passage of two key pieces of state legislation. One allowed students on public assistance to count work-study and internship hours toward the TANF work requirement. The other expanded access to education and training for recipients without children.[18] [19] In 2001, when the first cohort of TANF recipients approached their federal lifetime limit, FPWA provided outreach and education to show individuals how to transition smoothly to the Safety Net Assistance program.[20]**
- **In 2012, FPWA published a report that explored issues such as sanctions, onerous work requirements, and the limited ability of the cash assistance programs to respond to economic downturns like the Great Recession.[21] Ten years later, we are exploring similar themes through a different framework as we emerge from another crisis—the Covid-19 pandemic.**

Taking a Step Back: A Brief History of Cash Assistance

The roots of the cash assistance program that exists today date back to 1935, when a section of the Social Security Act created a program called Aid to Dependent Children (ADC) to provide funding to states to aid children of single mothers.[22] ADC was a federal entitlement program, meaning that all those who were eligible could receive it, and that funding for the program would increase if more people became eligible and applied. But because states controlled ADC eligibility and benefit levels, access to the program was unequal, and many mothers of color were intentionally excluded.[23] In the 1940s and 1950s, as enrollment in ADC grew, some states imposed punitive policies that overwhelmingly harmed Black families in particular.[24] For example, part of the legislation stated that assistance could only be provided to children in "suitable homes," and caseworkers and local program administrators used this to deny assistance to children of Black and unmarried women.[25]

In 1962, ADC was renamed Aid to Families with Dependent Children (AFDC).[26] In the mid-1960s, the National Welfare Rights Organization started organizing to defend the rights of women on AFDC.[27] The activists, who were mostly women of color, demanded that the program provide adequate income for recipients, and their organization worked alongside lawyers to file hundreds of court cases to challenge the management of AFDC.[28] At the same time, fierce debates about cash assistance and narratives about Black mothers as "unfit" or too "dependent" on benefits began to dominate political discourse.[29] The infamous "welfare queen" invective was centered on AFDC, and because AFDC was an entitlement program, critics argued that it created "welfare dependency." This assumption was not only harmful, but it was also inaccurate: About half of AFDC recipients received benefits for less than two years, and less than a quarter received benefits for longer than five years.[30] Typically, those who remained in the program long-term did so because they faced significant barriers to employment, such as having very young children, a lack of education, or a lack of work experience.[31]

In 1996, these false narratives won out over facts when the Personal Responsibility and Work Opportunity and Reconciliation Act was signed into law, replacing AFDC with the TANF block grant.

The new program permanently limited the reach of federal cash assistance by capping funding at the level of expenditures for pre-TANF programs.[32] The legislation, commonly referred to as "welfare reform," also included time limits on assistance and barred several categories of immigrants from eligibility for their first five years in the U.S.[33]

TANF's purported purpose was to lift families out of poverty through work and the promotion of two-parent households, but notably, reducing poverty was not a stated goal of the program. Instead, its objectives were to (1) assist families so children could be cared for in their own homes or the homes of relatives; (2) reduce the "dependency" of parents by promoting job preparation, work, and marriage; (3) prevent pregnancies among unmarried individuals; and (4) encourage the formation and maintenance of two-parent families.[34]

Thus, from the start, the political rhetoric surrounding TANF and the very goals of the program itself were riddled with paternalistic notions of who was—and was not—"deserving" of assistance. This history continues to shape not only cash assistance but also broader attitudes and assumptions about its recipients.

Overview of Cash Assistance

With PRWORA, the federal government gave states broad discretion to determine how to use TANF dollars. Thus, the block grant is used to fund a wide range of benefits and services, including cash assistance; education, employment, and job training activities; short-term emergency assistance; child care; and other work supports. States are also permitted to use TANF funds for their own Earned Income Tax Credit (EITC) programs because such credits are considered a work support.[35]

To receive TANF funds, each state must also spend its own dollars on TANF-related programs, which is referred to as the state's "Maintenance of Effort" (MOE).[36] The 1996 legislation required states to spend at least 80 percent (or, if the state meets certain performance standards, 75 percent) of what they spent on TANF's predecessor programs during Federal Fiscal Year 1994.[37] For New

York, the MOE requirement sets the state's annual spending minimum at $1.7 billion.[38] The state far exceeds the minimum, spending $2.7 billion in 2020.[39]

As a block grant program, TANF left it to states to create and operate the programs that administered their federal funds. New York State established two programs: From TANF funding, the state created Family Assistance (FA) to provide cash assistance to families. And with state and local funding, New York established Safety Net Assistance (SNA) to serve both families with children and individuals without children.

Family Assistance is funded by TANF and operates under federal TANF guidelines. The program provides cash assistance to families that have a minor living with a parent or a caretaker relative.[40] Under FA, adults are limited to receiving benefits for a total of 60 months (with some exceptions).[41] [42]

Safety Net Assistance, the program funded by the state and the counties, provides cash assistance to individuals and families who do not qualify for FA: single adults, couples without children, children living apart from adult relatives, some immigrants, and families that have reached the 60-month FA limit. SNA has two parts: SNA-MOE, which represents the state's Maintenance of Effort obligation and covers families with children; and SNA non-MOE, which operates under state guidelines and covers individuals without children. Both programs offer recipients the same level of assistance and are governed by the state's Office of Temporary and Disability Assistance (OTDA).

New York State's combined federal and state TANF spending totaled about $5.2 billion in 2020. Figure 1 shows the breakdown of how the state spent those funds. Though basic assistance, typically cash assistance, accounted for only 28 percent of the spending, we are focusing on that benefit in this report because it represents the largest category of spending and has the most direct impact on recipients' financial stability.

FIGURE 1
2020 FEDERAL AND STATE TANF SPENDING BY CATEGORY IN NEW YORK STATE[43 44]

TYPE OF ASSISTANCE	AMOUNT SPENT	PERCENTAGE OF TOTAL SPENDING
BASIC ASSISTANCE Cash assistance provided to recipients	$1.4 billion	28%
TAX CREDITS Refundable portions of state or local earned income tax credits or other tax credits paid to families	$1.3 billion	25%
PRE-K/HEAD START Includes expenditures for pre-kindergarten or kindergarten education programs, expansion of Head Start programs, and other school-readiness programs	$497 million	10%
CHILD CARE Includes expenditures for families that need child care to participate in work activities	$479 million	9%
CHILD WELFARE Includes services provided to children and families in the child welfare system or at risk of being involved in the system	$349 million	7%
WORK ACTIVITIES Includes costs related to providing services such as job search assistance, employment counseling, coaching, etc.	$120 million	2%
WORK SUPPORTS AND SERVICES Includes transportation benefits and necessities for obtaining or maintaining employment such as tools, work uniforms, or fees to obtain special licenses	$44 million	1%
ADMINISTRATION AND SYSTEMS Includes costs associated with case management services and program monitoring and tracking	$484 million	9%
OTHER SERVICES	$447 million	9%
TOTAL	**$5.2 billion**	**100%**

More than half a million New York State residents receive benefits through the state's basic assistance programs. For these recipients, the first key benefits gap is caused by a major shortcoming of the TANF block grant: It is not adjusted for inflation over time, so New York State receives the same $2.4 billion that it did when TANF was established 26 years ago, dropping its real value by 40 percent.[45] If the block grant were adjusted for inflation, New York would receive nearly $1 billion in additional funding.

The declining value of federal TANF funding is also having a significant impact on New York City and the city's human services sector. FPWA's Federal Funds Tracker for City Fiscal Year 2021, which documented the flow of emergency Covid-19 relief funding through the city's human services agencies, showed that over the previous three years federal TANF funding to the city fell to the lowest levels since 2011, after adjusting for inflation.

FA and SNA Recipients in New York

Both FA and SNA provide cash assistance to New Yorkers in every part of the state. The most recent statistics, recorded in May 2022, show that the caseload totaled 520,671 recipients, with 172,329 receiving FA and 348,342 receiving SNA. This includes 223,622 children and 297,049 adults.[46]

The reason SNA covers nearly twice as many recipients as FA is that it comprises both families with children and single adults without children, and it covers some who are ineligible for FA, including those who have exceeded the 60-month federal time limit. In July 2020, for example, 42 percent of SNA recipients were in households with children (SNA-MOE "family" cases), and 58 percent were single adults and couples without children (SNA non-MOE "single" cases).[47]

Demographic data reveal some important factors in assessing financial gaps in the FA and SNA programs. Figures 2 and 3 show the racial breakdown of families receiving FA and SNA-MOE for Federal Fiscal Year 2020. Notably, white families represented 17.8 percent of FA recipients but only 7.9 percent of those on SNA-MOE. The balance goes in the other direction for Black families—from 35.2 percent for FA to 45.5 percent for SNA. This suggests that many more white households can exit the program within five years compared to Black families, due in part to the fact that Black families face additional challenges to economic security not faced by white families. Several of these structural disadvantages, such as inequities in wages and in the labor market more broadly, are discussed later in the report.

This dataset also shows that the vast majority of FA adult recipients—89 percent—identify as female, and most recipients of FA and SNA overall identify as women.[48] [49] These demographics reflect broader poverty trends, which consistently show that women and Black individuals face higher rates of poverty.[50]

FIGURE 2
NEW YORK STATE FAMILY ASSISTANCE RECIPIENTS BY RACE, FY2020[51]

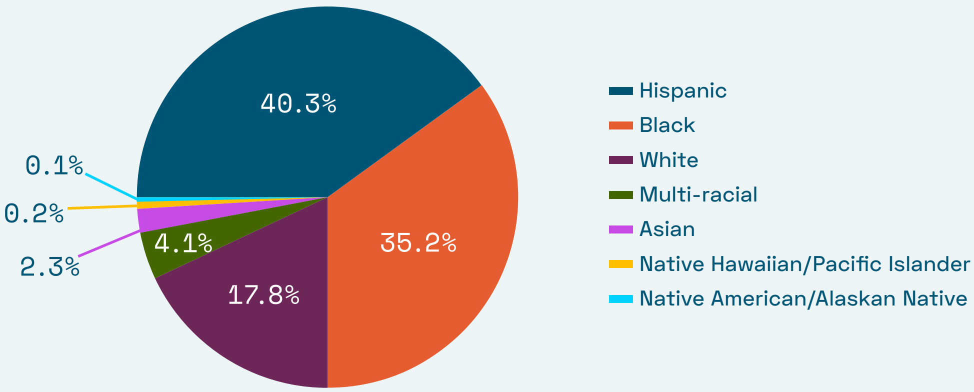
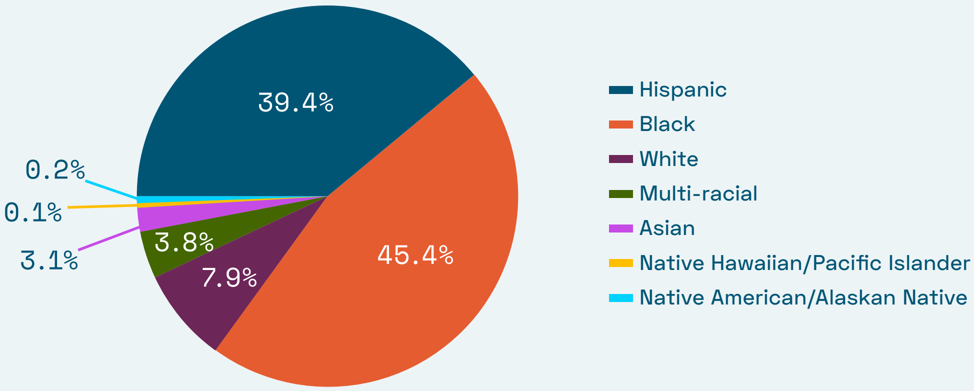


FIGURE 3
NEW YORK STATE SAFETY NET ASSISTANCE-MOE RECIPIENTS BY RACE, FY2020[52]



Eligibility and Program Requirements

In order to receive FA or SNA, individuals and families must navigate a complex set of requirements. Figure 4 provides an overview of this process, and a more in-depth analysis of the barriers related to this process can be found in the Coverage Gaps section.

FIGURE 4
STEPS TO APPLY FOR FA AND SNA [53]

APPLICATION

Applicants for FA and SNA must complete a lengthy 24-page application containing detailed information about their household's citizenship status, all income and expenses, education, medical information, and more. In New York City, this can be done through an online program called Access HRA. Applicants are then required to participate in an interview and may be required to submit additional paperwork thereafter. (During the Covid-19 pandemic, interview requirements were temporarily suspended, removing what can be a significant barrier.)

DOCUMENTATION

Applicants are required to submit numerous documents, which may include passports, birth certificates, hospital records, driver's licenses, apartment leases, property and school tax records, Social Security cards, and immigration paperwork. Applicants are also required to submit documentation to verify any income and assets they have.

WORK REQUIREMENTS

FA and SNA recipients must comply with work requirements and face sanctions if they do not. Certain recipients are exempt, such as parents of young children, pregnant individuals, and individuals with a disability or an illness. Work requirements were also suspended during the Covid-19 pandemic.

RECERTIFICATION

Recipients must periodically recertify by completing another lengthy application and providing necessary documentation within 10 days of their recertification. Recipients may also have another interview and may have to submit additional documentation after the interview. The length of an applicant's certification period varies depending on their situation, so an individual may be required to recertify as often as every 6 months or every 1-2 years.

Financial Gaps in New York's Family Assistance and Safety Net Assistance Programs

In the 26 years since the inception of Temporary Assistance for Needy Families, New York State has taken significant actions to make cash assistance accessible in the state. The state has ensured that people who are living in poverty but are not eligible for FA—either because of the 60-month time limit or some other factor—can maintain access through its parallel SNA program. New York has also ended some harmful practices, such as the lifetime ban on benefits for people with a drug felony conviction.

However, by other measures, New York lags behind other states. The state still has a restrictive asset test, which we discuss in more detail in the following sections. Its maximum monthly benefit is below that of states such as New Hampshire and California, and it is even more inadequate considering that the cost of living in New York State is 10 percent higher than the national average.[54] [55] Furthermore, our analysis revealed several financial gaps in the FA and SNA programs related to issues such as exclusionary eligibility criteria, program requirements that limit access, and benefit levels that relegate individuals and families in New York City and State to what the federal government defines as "deep poverty."

In the following sections, we outline these findings and offer a roadmap to ameliorate these financial gaps in New York's cash assistance programs. With needed reforms, we believe New York State's cash assistance program holds potential to become a national model.

Eligibility Gaps

Eligibility gaps occur when an individual or family's income is above eligibility for FA and SNA while still being too low to meet their basic needs.

Key Takeaways

- FA and SNA have unreasonably low income and asset limits that result in the programs excluding the vast majority of people living in poverty in New York State.

ELIGIBILITY GAP #1

Because the income limits for FA and SNA are so low, the programs reach only a small percentage of the New Yorkers who are experiencing poverty—and do not even reach all those with incomes below the artificially low Federal Poverty Level (FPL).

In *Pushed to the Precipice*, our analysis revealed that benefits cliffs are in some ways a symptom of the fundamentally unsound method government uses to gauge need and to decide who qualifies for benefits: the Federal Poverty Level (FPL). Developed in the 1960s, this benchmark is now widely acknowledged to be an antiquated and woefully unrealistic tool for assessing the means and needs of individuals and families with low incomes today. Because the FPL has only been updated for inflation, it also fails to account for the dramatic changes in living standards since its inception.

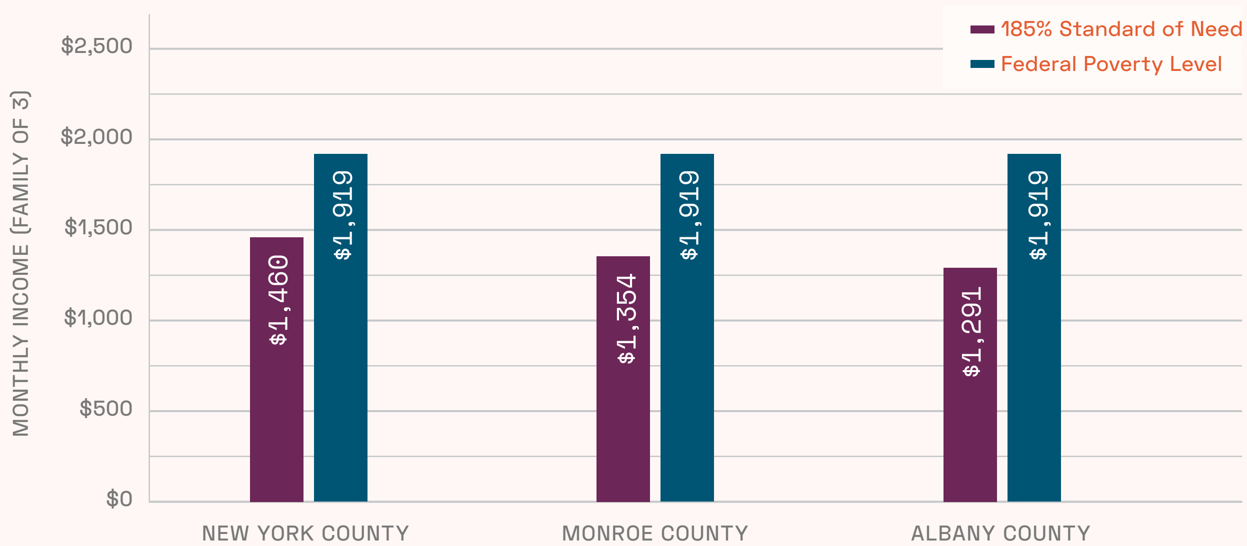
Eligibility for FA and SNA has historically been tied not just to the FPL but also to another deeply inadequate measure called the "standard of need," which purports to calculate the cost of meeting basic needs given a household's size and county of residence. (It is also used to set benefit levels, which is discussed in the Hardship Gaps section.) The standard of need comprises various "allowances" for food, shelter, home energy, and other needs. Eligibility for FA and SNA has long been restricted to those with gross income of less than 185 percent of the standard of need. For FA recipients, gross income has also been limited to the FPL for their household category.

Because the standard of need has historically limited eligibility, we are encouraged that the 2022-2023 New York State budget included the repeal of the 185 percent standard of need test, as well as the FPL test, effective October 1, 2022.[56] While still using the standard of need to determine eligibility, it will now be based on net rather than gross income and use more generous income "disregards," amounts that are exempted from income-eligibility calculations.[57] This will allow more households with earned income to remain eligible for cash assistance—a significant expansion and in part an acknowledgement of how outdated and arbitrary the measures are. Still, New York State should go farther and replace both the standard of need and the FPL with a more accurate threshold for determining need for applicants and recipients.

Figure 5 illustrates how the now-repealed 185 percent standard of need test drastically limited eligibility for FA and SNA, comparing it to the FPL in three counties in New York State. Because the FPL is adjusted each year, 185 percent of the standard of need was *below the FPL in all counties*. In Albany County, for example, for a family of three, the standard of need is just $698 per month, so 185 percent of that measure is still just $1,291. The FPL for that family of three in 2022 is $1,919 per month—far above the standard of need threshold. Thus, these thresholds have limited eligibility so much that FA and SNA have not been available even to all those living below the FPL. In fact, most New Yorkers are disqualified from receiving assistance before their earnings reach even 70 percent of the FPL.[58] This policy failure is all the more glaring because the FPL is, to begin with, an extremely low threshold that has been used to deliberately undercount the number of people experiencing poverty. Thus, the standard of need—the basis for FA and SNA eligibility—is even more detached from economic reality.

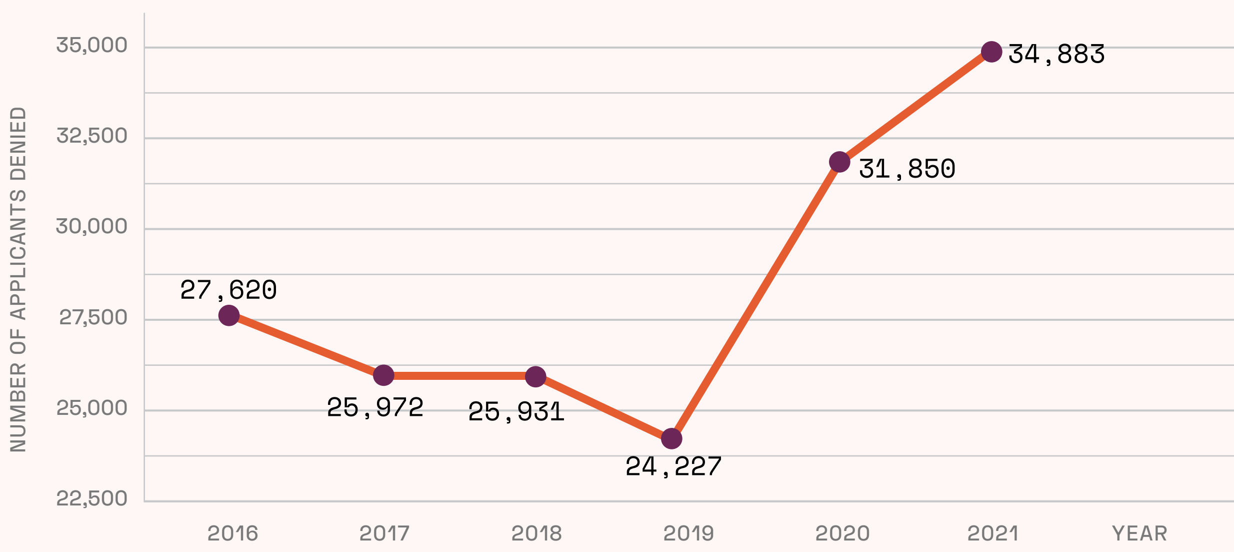
In fact, most New Yorkers are disqualified from receiving assistance before their earnings reach even 70 percent of the FPL. This policy failure is all the more glaring because the FPL is, to begin with, an extremely low threshold that has been used to deliberately undercount the number of people experiencing poverty.

FIGURE 5
COMPARING THE FPL TO 185% STANDARD OF NEED (MONTHLY INCOME, FAMILY OF 3) [59, 60]



FA and SNA's extremely restrictive income limits mean that the programs have a significantly smaller reach than that of already-limited programs like SNAP and Medicaid. For example, as aforementioned, total FA and SNA recipients equaled 520,671 in May 2022.[61] By comparison, SNAP had 2,873,666 recipients that month.[62] The extremely low eligibility threshold prevents many New Yorkers with low incomes from qualifying for assistance. OTDA data obtained by FPWA (Figure 6) shows that tens of thousands of applicants are denied each year specifically because their income exceeds the program's unjustly low limits.

FIGURE 6
NUMBER OF FA & SNA APPLICANTS DENIED DUE TO INCOME LIMITS[63]



Another way to measure this eligibility gap is to compare the number of recipients of cash assistance to the number of New Yorkers living below the FPL. For example, there are approximately 500,000 New Yorkers receiving FA and SNA each year, yet more than 2.5 million lived below the FPL in 2020, according to the U.S. Census Bureau's American Community Survey.[64] But again, even this estimate does not accurately estimate the gulf between who is able to receive cash assistance and who may be in need of cash assistance because the FPL grossly underestimates the number of New Yorkers who are experiencing poverty.

There are approximately 500,000 New Yorkers receiving FA and SNA each year, yet more than 2.5 million lived below the FPL in 2020.

ELIGIBILITY GAP #2

The extremely low asset limits for FA and SNA prevent individuals and families from qualifying and effectively make economic insecurity a condition of receiving assistance.

FA and SNA have asset limits that restrict applicants from having even modest savings. To qualify for FA or SNA, an applicant's assets may not exceed $2,500 except for households in which any member is age 60 or over or has a disability. Asset limits go up in those cases, but only to $3,750. (These limits were increased from $2,000 and $3,000 in this year's state budget). A house that is a recipient's primary residence is exempt from the asset test. But there are strict limits on other assets, including cars, which can have a market value no higher than $12,000, and post-secondary education funds, for which individuals may have no more than $1,400 in savings.[65] Notably, retirement accounts are not exempt.

The federal government has authorized states to set their own asset limits, and states also have the option of eliminating them altogether, which some have done.[66] In New York, the limits prevent some residents from receiving cash assistance: OTDA data show that during 2020 and 2021 over 4,000 applicants for FA and SNA were denied assistance specifically because of asset limits.[67] This is especially troubling considering these 4,000 households were denied cash assistance during the pandemic, when assets became a critical lifeline and a key to maintaining financial stability for many people.

We applaud the state legislature and the governor for raising the asset limits. It is a step forward and will allow individuals and families to save more and still qualify. However, these limits are still too low, and the restriction itself serves to discourage savings among those who access cash assistance.[68] Further, the administrative costs and burden of verifying assets remain onerous and expensive.[69] As an example, the Illinois Department of Human Services estimated that it spent $960,000 worth of caseworker time checking TANF families' assets in 2012, only to find just eight cases where family assets exceeded the $3,000 limit.[70]

It is also important to note that asset limits may exacerbate racial disparities in the programs' administration. For example, the rule exempting a primary residence from a household's asset calculation is a benefit for recipients—but not an equitable one. The country's history of racist housing policies has resulted in higher rates of homeownership for white people than by people of color.[71] [72] Thus, a white family has a better chance of owning a home and still qualifying for benefits.

Coverage Gaps

Coverage gaps occur when an individual or family qualifies for FA or SNA but does not receive it because of administrative challenges or bureaucratic barriers.

Key Takeaways

- The application process, recertification process, and work requirements prevent individuals and families from accessing FA and SNA.
- Work requirements are rooted in racism and disproportionately harm people of color.
- The program's high rate of churn—the on-and-off-and-on enrollment pattern that characterizes many individuals' experiences with benefit programs—undermines financial stability for recipients.

COVERAGE GAP #1

The onerous application and recertification processes prevent individuals and families from accessing cash assistance.

The requirements related to applying for and recertifying for FA and SNA pose significant obstacles for individuals and families. This was not only a focal point of our conversations with experts and providers, but it is also reflected in the data: The most common reasons individuals and families are denied benefits at their application, and the most common reasons recipients lose benefits at recertification, are barriers related to these processes. Figure 7 displays the number of denials due to the application process alongside the total number of denials for the last four years. From July 2019 to June 2020, for example, of the 222,551 applications denied, 53 percent were rejected for reasons related to the application process itself, such as an applicant missing the interview or failing to provide all the documentation required.[73] For example, as noted in Figure 4, the application is lengthy and requires extensive, detailed information about all household members. It also asks sensitive questions such as whether the applicant has been the victim of domestic violence or is experiencing substance abuse.[74]

The most common reasons individuals and families are denied benefits at their application, and the most common reasons recipients lose benefits at recertification, are barriers related to these processes.

Given the arduous application and recertification requirements, it is unsurprising that the process itself prevents many individuals and families from accessing cash assistance. For example, during the July 2019 to June 2020 period, 240,111 cases were closed, and of these, 43 percent were due to issues such as recipients' inability to recertify on time.[75] Figure 8 displays this data from the past four years. While the numbers decreased during the pandemic, this data consistently indicates that the onerous paperwork and other requirements related to applying and recertifying prevent large numbers of New Yorkers from accessing cash assistance each year. They represent a significant percentage of the approximately 500,000 people who receive FA and SNA benefits in a typical year.

FIGURE 7
FA AND SNA DENIALS DUE TO ISSUES RELATED TO THE APPLICATION PROCESS

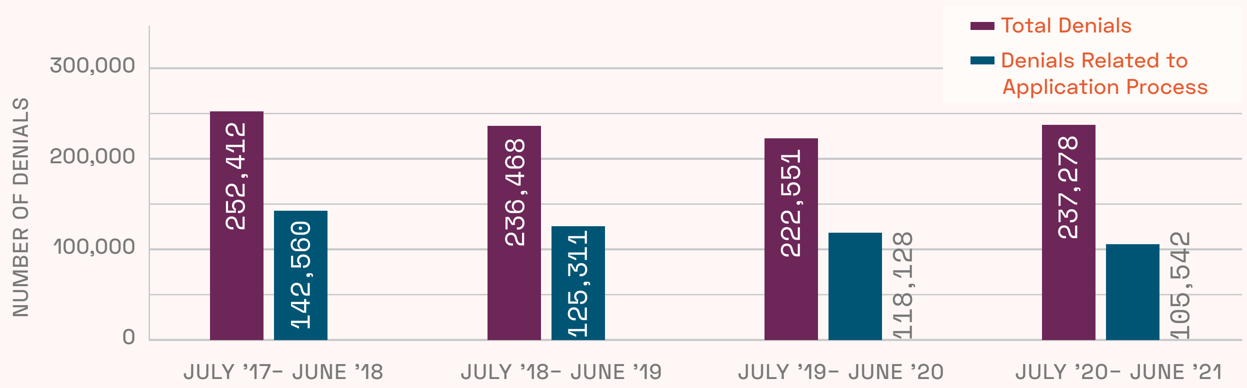
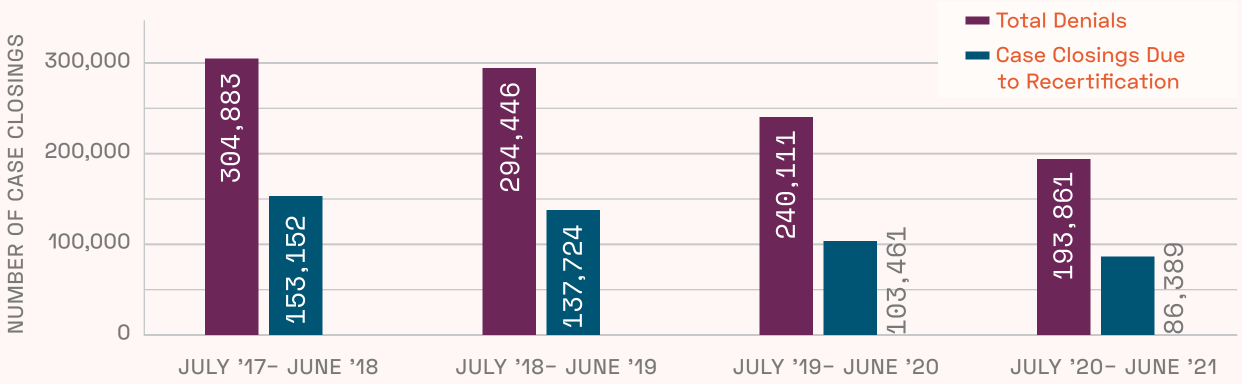


FIGURE 8
FA AND SNA CASE CLOSINGS DUE TO ISSUES RELATED TO THE RECERTIFICATION PROCESS



COVERAGE GAP #2

Work requirements prevent individuals and families from maintaining FA and SNA and lead to punitive measures such as sanctions, thus exacerbating and criminalizing poverty. Work requirements also fail to help households achieve economic security.

FA and SNA recipients must engage in "work activities" unless they are determined to be exempt.[76] Examples of work activities permitted under state statute include employment in the public, nonprofit, or private sectors, as well as on-the-job training and job search activities.[77] Certain individuals can be exempt, such as parents of young children, pregnant individuals, individuals with a disability or an illness, people experiencing domestic violence, and individuals caring for a household member who has a disability or who is 60 years of age or older.[78] In New York State, most adults receiving assistance are exempt, but a significant number are still subject to work requirements: From July 2019 to June 2020, for example, a monthly average of 103,983 FA and SNA recipients were nonexempt and required to comply with work requirements, representing 43 percent of all adult recipients.[79]

Work requirements are another common reason why individuals and families are denied FA or SNA and why individuals and families lose benefits at recertification. From July 2019 to June 2020, for example, 23,542 applications were denied because of employment-related requirements, which are a condition of eligibility, and 15,533 recipients lost their benefits due to issues related to work requirements.[80]

As outlined in Figure 4, individuals may also be penalized with reduced benefits if they do not engage in work activities without good cause. Work requirements are typically the main reason recipients are sanctioned in New York: During this same period (July 2019 to June 2020), 67 percent of all sanctions imposed on nonexempt recipients were employment-related.[81] From 2016 to 2021, nearly 118,000 recipients were sanctioned due to work requirements—over 4,000 of them in 2021 during the Covid-19 pandemic (after such requirements were reinstated in June 2021).[82] [83] Further illustrating this problem is research indicating that states often apply employment-related sanctions inappropriately to recipients who face barriers to work—such as those who are fleeing domestic violence, have health issues, or those with limited education and/or professional experience.[84] A sanction reform bill signed into law in 2015 rectified some of these issues in New York, but this continues to happen: As one example, a petitioner challenging a sanction in Monroe County was found to have been unable to prove that she was eligible for an exemption due to disability *precisely because of her disability*.[85]

For a variety of reasons, work requirements also fail to help households achieve economic security. These requirements are, by definition, broadly conceived and universally imposed mandates that are unresponsive to the unique needs or circumstances of individuals and families. They prioritize securing an immediate job over fostering stable, long-term employment.[86] Research shows that these work requirements cycle recipients into unstable, low-wage jobs and do not improve their long-term economic stability.[87]

To illustrate this, FPWA obtained data from OTDA showing the average hourly wage for FA and SNA recipients for the month of June in three consecutive years (Figure 9). Notably, average wages are below $15 per hour outside of New York City. While inadequate wages point to a broad structural problem, this data shows that recipients subject to work requirements are not earning enough to be economically secure. According to data from the New York State Self-Sufficiency Standard—a tool developed by the Center for Women's Welfare at the University of Washington that measures the cost of meeting basic needs in each county in New York State—these wages are well below the income that New Yorkers need to be able to afford housing, child care, food, health care, and other expenses.[88] Further, many recipients face serious barriers to work. In a recent study by the Urban Institute, FA recipients reported challenges such as limited flexibility in scheduling, conflicts with care-giving responsibilities, and lack of education as primary challenges that made it difficult for them to find work that could allow them to afford even their basic needs.[89]

FIGURE 9
AVERAGE HOURLY WAGE FOR FA AND SNA RECIPIENTS WITH EARNED INCOME[90]

	NEW YORK CITY	REST OF STATE	TOTAL NYS
JUNE 2019	$15.11	$11.97	$14.41
JUNE 2020	$15.83	$12.74	$15.35
JUNE 2021	$16.35	$13.01	$15.95

Unequal enforcement of work requirements also harms people of color disproportionately, and work requirements have a long history that connects all the way back to slavery and other forms of forced work in the 1800s.[91] [92] Throughout the history of cash assistance programs dating back to the early 20th century, policymakers used racist stereotypes—for example, that Black women are somehow “unfit” mothers—to shame and control Black women who receive cash assistance and to “compel their labor.”[93] Given this history, it is no surprise that work requirements disproportionately cut off Black families: Almost every study of TANF sanctions finds that families of color, and especially Black families, are significantly more likely to be sanctioned than white families.[94] This remains true with sanctions related to work requirements, and studies show that Black recipients and other recipients of color are more likely to face sanctions because of racial bias and stereotyping by case workers who enforce them.[95]

New York State is not exempt from the consequences of this history and the widespread racial bias that persists today. Black individuals face employment discrimination and a deeply inequitable labor market. As a result, they earn lower wages and have disproportionately high unemployment rates—all barriers that make it more likely that Black New Yorkers will face employment-related sanctions.[96] [97]

COVERAGE GAP #3

The program's high churn rate undermines financial stability for FA and SNA recipients.

"Churn" refers to the on-and-off-and-on enrollment pattern that characterizes many individuals' experiences with benefit programs. To illustrate the prevalence of this pattern in FA and SNA, FPWA obtained data from OTDA showing that a quarter of adults in FA and SNA who exit the program re-enter within one year (Figure 10).[98] This amounts to tens of thousands of adults, and tens of thousands more children, who continue to experience poverty after exiting the program.

FIGURE 10
PERCENTAGE OF FA AND SNA CLOSED CASES REOPENED WITHIN 1 YEAR

	YEAR OF EXIT	TOTAL EXITS	PERCENT REOPENED WITHIN ONE YEAR
ADULT(S) WITH CHILDREN AT EXIT	2016	69,768	26%
	2017	67,074	27%
	2018	68,164	25%
	2019	59,838	26%
ADULT(S) WITHOUT CHILDREN AT EXIT	2016	91,191	24%
	2017	92,763	24%
	2018	95,227	24%
	2019	88,812	26%

Churn has been shown to be caused most often by delays or other issues related to the benefits recertification process rather than by changes in recipients' eligibility status.[99] [100] In FA and SNA, this is unsurprising given the challenges related to recertification outlined in the first Coverage Gap section. In cases where recipients are removed properly due to ineligibility, it still means that these recipients exit the program but are not set up for economic stability beyond the program. Regardless, this points to the level of economic volatility faced by individuals and families accessing FA and SNA.

Hardship Gaps

Hardship gaps occur when an individual or family is receiving FA or SNA, but their resources remain below the cost of living even after taking into account the value of the benefit (along with other sources of income, such as earnings from work).

Key Takeaways

- **FA and SNA benefit levels fall far short of what individuals and families need to meet their basic needs.**
- **FA and SNA are not only ineffective at reducing poverty, but the inadequacy of the benefit levels perpetuates economic hardship among recipients.**
- **The grant's shelter allowance is woefully inadequate and covers only a small fraction of the cost of housing for New Yorkers.**
- **Asset limits further prevent economic security and mobility for recipients of FA and SNA.**

HARDSHIP GAP #1

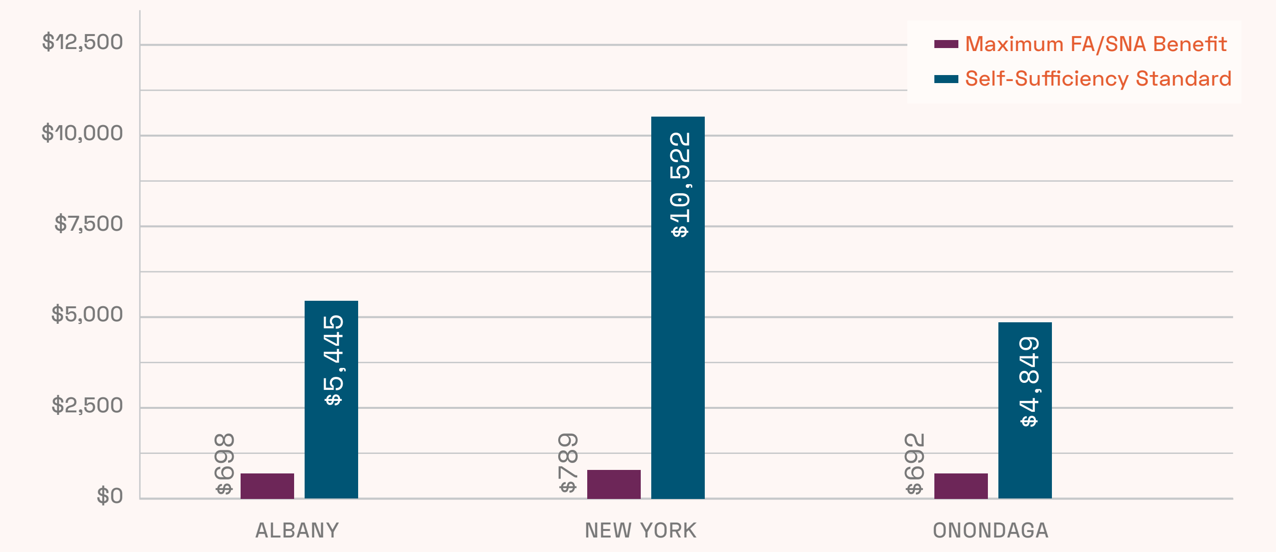
The FA and SNA benefit levels are far below the Self-Sufficiency Standard. Thus, all individuals and families receiving cash assistance experience a hardship gap.

Our research shows that FA and SNA benefits are not enough to cover basic needs, indicating that all recipients experience a hardship gap. Benefit levels are based on the standard of need, and the maximum benefit is equal to the standard of need in that county. This means that even the maximum benefit is well below the Self-Sufficiency Standard, the county-by-county cost of living measure developed by the Center for Women's Welfare at the University of Washington. And it is also well below the FPL: In New York State, as of 2021 the maximum benefit for a family of three was still only at 43.1 percent FPL.[101] Thus, not only are FA and SNA unsuccessful in reducing poverty, but in many ways the inadequacy of their benefit levels contributes to the continuation of hardship for New Yorkers with the lowest incomes.

[E]ven the maximum benefit is well below the Self-Sufficiency Standard...and it is also well below the FPL: In New York State, as of 2021 the maximum benefit for a family of three was still only at 43.1 percent FPL.

Figure 11 shows how the maximum benefit compares to the Self-Sufficiency Standard. For example, for a family of three in Albany County, the maximum benefit in 2021 was $698 per month.[102] [103] For that family of three (with one adult, one preschooler, and one school-aged child), the cost of living according to the Self-Sufficiency Standard is $5,454 per month. In New York County, meanwhile, the maximum benefit for a family of three in 2021 was $789 per month. Their cost of living according to the Self-Sufficiency Standard is $10,522 per month.

FIGURE 11
COMPARING THE MAXIMUM MONTHLY FA/SNA BENEFIT TO THE SELF-SUFFICIENCY STANDARD (FAMILY OF 3, 2021)



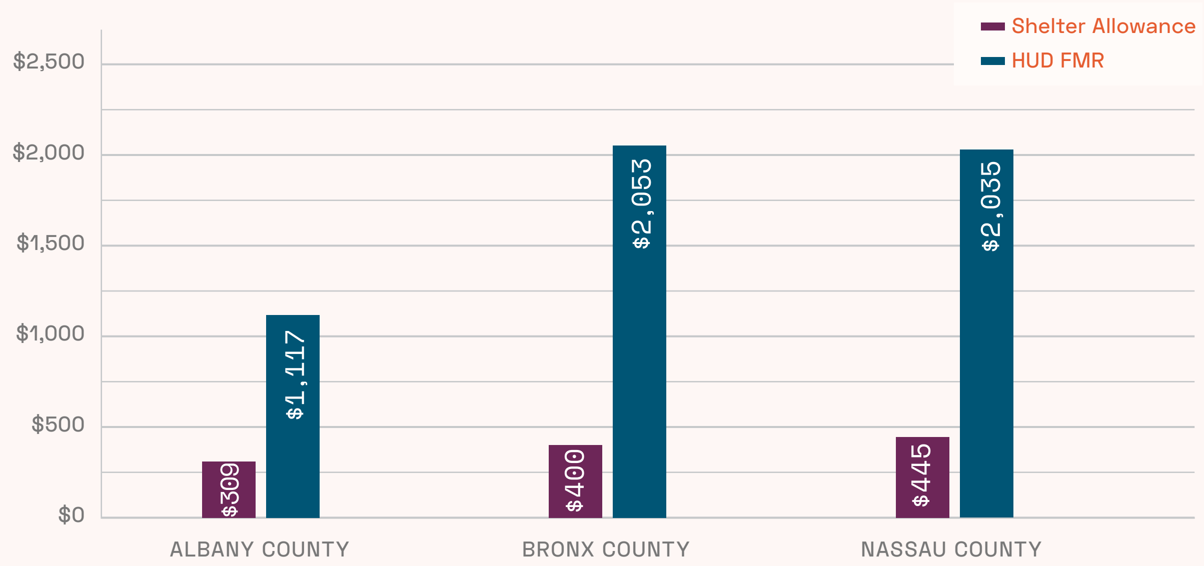
HARDSHIP GAP #2

The grant's allowance for housing is far lower than the cost of housing in all counties.

As mentioned in the Eligibility Gaps section, the FA and SNA grants include a shelter allowance, which is supposed to serve as rental/housing assistance and reflect the cost of housing for various family types. This allowance, however, has not been updated in years: For households with children, it was last increased in

2003, and for single adults it hasn't been increased since 1988. Consequently, the shelter allowance is woefully inadequate—far below the actual cost of housing in every county—thus creating a hardship gap for all recipients. Figure 12 provides examples of how the shelter allowance compares to the U.S. Department of Housing and Urban Development's (HUD) Fair Market Rent (FMR) in various counties in New York State. As the chart demonstrates, the shelter allowance covers just 27 percent of HUD FMR in Albany County, 19 percent in Bronx County, and 22 percent in Nassau County.

FIGURE 12
COMPARING THE SHELTER ALLOWANCE TO HUD FMR (FAMILY OF 3, 2021)



HARDSHIP GAP #3

Asset limits prevent economic security and mobility for FA and SNA recipients.

Although FA and SNA recipients have met the asset-limit requirement in order to access the program, they are still subject to the rule while receiving cash assistance. However, in raising the asset limits for applicants to FA and SNA, New York State also increased the limit for recipients to $10,000. Once again, we applaud this initial step. Allowing New Yorkers to increase their savings while receiving the cash assistance they need for basic living expenses will mitigate this hardship gap.

Still, even at the higher threshold, the asset limit presents a hardship gap for this population because it means that recipients of cash assistance are relegated to economic insecurity as a condition of maintaining their eligibility. Lower income groups face significant income volatility, so it is even more critical for FA and SNA recipients to have assets to withstand this kind of unpredictability.[104] If the importance of assets among communities with low incomes was not clear before Covid-19, the pandemic further highlighted how critical emergency savings are for individuals and families in times of crisis. Beyond economic security, having assets provides a level of safety, dignity, and peace of mind that all New Yorkers deserve, especially in times as uncertain as global pandemic.

At the same time, the reality—something of a Catch-22—is that the income limits placed on FA and SNA recipients make it virtually impossible for them to save. In that way, the dual limits on income and assets together ultimately contribute to the continuation of economic struggle for recipients—and may create an almost insurmountable barrier to long-term security.

Recommendations to Address Financial Gaps

Sweeping changes to TANF at the federal level are critical and long overdue. These changes should include increasing federal TANF funding to meet need, requiring all states to offer cash assistance that allows recipients to meet their needs, and setting a federal minimum benefit level. TANF regulations should also eliminate the 60-month time limit for benefits and the five-year waiting period for some immigrants. More broadly, it is time to shift away from the punitive design that has long reinforced racial and gender inequities to one that is focused on equity and being responsive to the unique needs and goals of each individual and family.[105]

Though it is clear that major changes are needed at the federal level, the focus of our advocacy efforts is on the significant improvements that must also be made in the system that governs benefits in New York. Thus, for the purposes of this report, we have focused our recommendations on the city and state. Please note that the bill numbers for various pieces of New York State legislation referenced in this section are from the 2021-2022 legislative session, and they may be reintroduced under new bill numbers in future sessions.

New York State Recommendations

Recommendation #1: Increase the FA and SNA benefit level for all recipients.

Our analysis shows that the FA and SNA benefits are extremely inadequate. Thus, the state legislature should pass two pending bills that would increase components of the cash assistance grant: Assembly bill A9130 and Senate bill S9513, which would increase the various non-shelter components of the cash assistance grant for inflation; and Assembly bill A8900 and Senate bill S8632, which would increase the shelter allowance to 100 percent of HUD Fair Market Rent. (As shown earlier in this report, the shelter allowance in New York counties is now typically under 30 percent of FMR.) These legislative changes would close key hardship gaps for recipients of FA and SNA.

Recommendation #2: Expand FA and SNA to more individuals and families by increasing the income eligibility limit.

As a long-term solution, we recommend tethering eligibility to a measure of poverty that is more up to date and realistic than the FPL so that all New Yorkers who need assistance would qualify. But until the FPL is replaced, New York should pass Assembly bill A9112, which would increase eligibility for FA and SNA to 200 percent FPL. In addition, New York State should increase income disregards to allow FA and SNA recipients to keep more of their earnings without facing a benefits cliff that would end their eligibility. For example, Senate bill S6589 and Assembly bill A7534 would exempt income earned from certain job training or adult education programs. New York should also make an important reform related to child support payments. Currently, recipients must forfeit child support payments to the state, meaning that the state or local districts retain a portion of such payments as a sort of reimbursement for the cost of cash assistance. Consequently, children do not receive the full payment. New York could do what Colorado has done: pass through 100 percent of these payments to those children, rather than using it to reimburse the state or local districts and disregard this income in determining eligibility for cash assistance.[106] This would improve economic security among children in all parts of the state.

Recommendation #3: Eliminate the asset limit for both applicants and recipients.

In theory, asset limits ensure assistance only goes to those most in need. But in reality, they serve as a barrier to financial stability for applicants and recipients of FA and SNA—forcing them to essentially trade off long-term economic stability for short-term survival. Asset limits are counter-productive and contradictory by nature:[107] Cash assistance is purportedly designed to provide temporary assistance while helping individuals and families become “self-sufficient,” but if its recipients are restricted from building economic security while in the program, these goals are unattainable.

This dilemma continues to be an immense challenge throughout the state: Approximately 27 percent of all New Yorkers are “asset poor,” meaning “without sufficient net worth to subsist at the poverty level for three months in the absence of income.”[108] Without assets, individuals and families remain in a precarious economic situation and may be unable to weather an economic crisis. Thus, merely increasing the limit does not undo the negative—and inequitable—impact of such limits, nor does it eliminate the burdensome paperwork and high administrative cost of enforcing these limits. There is a legislative solution: In addition to increasing the income eligibility limit for FA and SNA, A9112 would eliminate the asset test for applicants and recipients.[109] Several states—including Alabama, Colorado, Hawaii, Illinois, Louisiana, Maryland, Ohio, and Virginia—have already done so.[110] Eliminating this test would also address the eligibility gap for applicants and the hardship gap for recipients.

Recommendation #4: Expand the definition of work for FA and SNA.

While states cannot eliminate the work requirement for TANF-funded assistance because it is a federal requirement, states can broaden the definition of what counts as work to minimize the punitive impact and make the program more responsive to the unique needs and circumstances of individuals and families. For FA, New York State can follow Vermont’s lead and eliminate the hours requirement and expand the definition of work to include activities that will help families achieve their goals and improve their well-being.[111] The state can do the same for the SNA program—or even eliminate the work requirement altogether because it is a state program not subject to the same federal requirements as FA. The state can redesign SNA to better support individuals and families in reaching their goals, whether that be through furthering their education, entering a training program, searching for housing and/or child care, or seeking out quality mental health care or other means to improve their overall well-being.

Recommendation #5: Simplify the application and recertification processes and extend certification periods.
Our findings outlined in the Coverage Gaps section make it clear that the process to apply for FA and SNA is itself a barrier. New York State should simplify the application and vastly reduce the amount of documentation required to apply. To help achieve that goal, the state should engage FA and SNA applicants and recipients to gather feedback and learn about the challenges this process presented for them. The state should also provide more funding to counties for application assistance and language-access services to make the process more accessible for all New Yorkers. Additionally, the state should end the requirement for interviews.

The process of recertifying benefits—and knowing when and how to do so—poses a barrier to FA and SNA recipients as well. Currently, the length of one's certification period—how frequently a recipient is required to recertify—depends on the individual or family's circumstances and can range from six months to two years. New York State should extend certification periods to at least one year for all recipients and up to three years for those facing especially challenging circumstances, such as those who have experienced domestic violence.

In considering the barriers created by the complex application and recertification processes, it is important to note the reasons why individuals turn to FA and SNA for support in the first place. In a recent qualitative analysis by the Urban Institute, participants, many of whom were from New York, reported that they turned to TANF after experiencing a significant life event like a job loss, the birth of a child, or the ending of a relationship.[112] Given that individuals and families are turning to the cash assistance program during particularly stressful moments in their lives, it is critical that these processes do not further compound the challenges that applicants are already facing. Further, making these processes less burdensome is not only more efficient from an administrative perspective, but will also ensure a level of dignity and empathy to those seeking assistance.

Recommendation #6: Invest more in basic assistance.
When TANF was created, the vast majority of funds were used for cash assistance, but the percentage of funding spent on basic assistance has plummeted since.[113] Figure 1 on page 14 shows that just 28 percent of federal and state TANF dollars were allocated to basic assistance in 2020. New York State—and the federal government—should invest more in cash assistance for several reasons. Research shows that cash income not only improves individuals' ability to meet basic needs, but it is also linked to improved physical and mental health, improved food security and nutrition, and increases in rates of employment.[114]

Recommendation #7: Reduce administrative churn.
Our research shows that FA and SNA have extremely high churn rates—recipients exiting the programs largely because of administrative issues and then needing to return within a year, exacerbating their economic insecurity and volatility. The state should take action to prevent this phenomenon. Simplifying the recertification process can help reduce churn, and counties should provide several notices to recipients well in advance of the end of their certification period before closing cases to avoid increasing churn. The state can also implement a grace period in which a recipient's case will not be closed until the individual is contacted and offered support to complete their recertification. Finally, the state should also study the causes of churn in order to better inform policies to mitigate it.

Recommendation #8: Require OTDA to measure outcomes of FA and SNA.
Through our research and Freedom of Information Law (FOIL) requests to OTDA, it became clear that New York State lacks a clear process for measuring outcomes of the FA and SNA programs. Thus, in order to gain a more comprehensive understanding of the programs' impact on the economic well-being of recipients—and on poverty in the state—OTDA should measure recipients' income, assets, employment, and educational outcomes while in the program and after. This data should also be disaggregated by race and gender to better understand and address disparities.

New York City Recommendations

Given that the majority of FA and SNA recipients are residents of New York City, the city's Human Resources Administration (HRA) should make efforts to improve these programs. We offer the following recommendations, and these efforts can and should be replicated in other counties.

Recommendation #1: Implement a trauma-informed care approach.

The majority of applicants and recipients of FA and SNA have likely experienced complex challenges in addition to poverty, such as homelessness and domestic violence. For example, a study of TANF recipients in Utah found that almost half had experienced five or more Adverse Childhood Experiences (ACEs), defined by the Centers for Disease Control and Prevention as potentially traumatic events such as abuse, neglect, and violence that occur prior to age 18.[115] [116] ACEs can be caused by environments that undermine a child's sense of safety, such as a household affected by mental illness, substance abuse, or incarceration.[117] The impact of these experiences can continue through adolescence and adulthood and lead to health problems, mental illness, and substance use disorders. ACEs can also negatively impact employment and education outcomes.[118]

Given these associations, it is critical to implement a service delivery model that acknowledges and addresses potential toxic stress and/or trauma. In practice, this means that all staff, and especially case managers, should be trained to interact with applicants and recipients using a trauma-informed approach. At its core, this approach prioritizes creating a safe and supportive environment and fostering trusting relationships.[119] This can be achieved through agency practices and procedures that focus on partnership, empowerment, and support rather than adhering to a system of strict rules, punitive consequences, and unnecessary power dynamics. For example, case managers should focus on addressing the needs of all household members, ask *them* what their goals are, and then determine programs or supports that can best help them achieve their goals.

Evidence suggests that this approach works: In a study of families receiving TANF, caregivers who received trauma-informed peer support alongside standard TANF programming reported fewer depressive symptoms, reduced economic hardship, and greater earnings compared to the control group. They also had increased self-efficacy—their belief in themselves to do what was necessary to reach their goals. Furthermore, these caregivers were less likely to report developmental challenges among their children than the caregivers who did not receive trauma-informed care.[120] This would be an important reform for the city and could be done on the state level as well.

Recommendation #2: Invest more resources to enhance accessibility and uptake of FA and SNA.
Given the complexity of the FA and SNA programs—and the eligibility gap data cited above showing that the programs reach only a small percentage of the New Yorkers who are experiencing poverty—the city should invest more resources to ensure that (1) those who may be eligible are aware of the programs and (2) that those who want to apply are able to do so. More specifically, the city should increase funding to conduct outreach and education about cash assistance and to further enhance accessibility for all populations, including those with limited English proficiency and those with physical, mental, or developmental disabilities. The city should also hire more social workers and mental health professionals to provide support not only to applicants but to their household or family, which may include addressing challenges in the areas of education, employment, housing, and health.[121] This would allow FA and SNA recipients to be supported as they make decisions that are best for them and their unique circumstances.[122]

Looking Beyond FA and SNA: A Call for Systemic Change

While we need a strong benefits system and programs like FA and SNA that are targeted to those with the lowest incomes, making improvements in these programs will go only so far in confronting the systemic issues of widespread poverty and racism in our state and country. Nor will the changes we advocate fully address economic inequality or close the racial and gender wealth gap. If it was not clear before, the pandemic made it undeniable that we need bigger solutions—and a shift in approach in which a strong benefits system works in tandem with other policies that support individuals and families. What that in mind, we offer the following recommendations:

Recommendation #1: Replace the Federal Poverty Level with a more accurate poverty measure and create a true cost-of-living measure.

The federal government should replace the outdated FPL—a measure that is widely acknowledged to be an abysmally unrealistic tool for assessing the means and needs of individuals and families today—with a measure that correctly gauges basic needs and will provide a more accurate threshold to estimate the number of individuals and families experiencing poverty. Developing an updated, alternative way to measure poverty starts with creating a measure to calculate the true cost of a decent standard of living based on location and family composition. This would have profound implications not just for FA and SNA, but for the benefits system as a whole.

Recommendation #2: Raise wages.

FPWA was instrumental in the fight for a $15 minimum wage in New York State and successfully advocated for its passage in the 2016-2017 state budget. While this represented a significant step forward in the fight for more equitable wages, it is also clear that $15 an hour is still not a livable wage in any county in the state. Thus, the state should further increase the minimum wage to be aligned with the Self-Sufficiency Standard's cost-of-living estimates.

Recommendation #3: Establish universal access to quality, affordable child care.
The 2022-2023 New York State budget made significant expansions to child care, including increasing eligibility for child care subsidies to 300 percent FPL—which will make an additional 250,000 New York children newly eligible for assistance—and implementing a cap on copays for families earning less than the 300 percent FPL threshold.[123] While these investments and reforms were a significant step forward on the path to universal child care, New York children who are undocumented were excluded from this progress, and more work needs to be done to achieve truly universal child care in New York State.

Recommendation #4: Expand access to affordable housing.
Housing not only represents a basic need for all individuals and families, but it also is one of the most burdensome costs for households. This is especially true in New York City, where median rent has soared to $4,000 in Manhattan and $3,250 in Brooklyn as of May 2022.[124] According to research by the Urban Institute, TANF recipients cited housing costs as a significant challenge, even with available resources from employment and benefits.[125] They expressed serious concern about whether or not their earnings and benefits would cover the cost of housing, and those who receive a housing benefit feared it would be decreased or lost.[126] A continued commitment to policies that promote housing stability, including long-term housing subsidies and affordable housing, is critical not just for cash assistance recipients but for all New Yorkers.

Recommendation #5: Reinstate the expanded Child Tax Credit.
The American Rescue Plan Act included an expanded Child Tax Credit (CTC), increasing it from $2,000 per child per year to up to $3,600 per child age 5 or younger and $3,000 for those age 6 to 17. It also made the benefit paid to families monthly and expanded it to include families that previously did not qualify. This policy resulted in a significant and swift reduction in poverty and provided critical assistance to families to help offset the high costs of raising a family. Unfortunately, the expanded CTC expired at the end of 2021, resulting in a sharp increase in poverty in January 2022.[127]

Thus, the federal government should reinstate this expanded CTC and make it permanent.

Recommendation #6: Establish universal access to quality, affordable health care.

Having access to quality, affordable health care is a basic human right and is essential for the health and well-being of all New Yorkers. It is also a core component of economic equity. Though the Affordable Care Act has reduced the percentage of New Yorkers who are uninsured to 5 percent, that is still more than a million people.[128] Therefore FPWA continues its longstanding advocacy for the passage of the New York Health Act to ensure universal access to quality, affordable health care for all New Yorkers.

Recommendation #7: Explore guaranteed income proposals and policies to end racial disparities.

In cities across the country, pilot programs for various forms of guaranteed income are showing clear evidence that cash income not only reduces poverty but also improves outcomes for adults, children, and families.[129] Such programs also allow recipients to make decisions about what they and their families need without having to navigate a complex system of means-tested supports in order to receive it. Thus, we should consider guaranteed income programs that ensure a basic standard of living for everyone, so long as they do not leave those with the lowest incomes worse off. To address racial inequity, we should implement policies designed to lift up communities of color, such as those that expand access to homeownership and asset building, reparations, and other solutions to close the racial wealth gap.

Conclusion

Both Family Assistance and Safety Net Assistance provide critical aid to the individuals and families who receive it. But in their current design and capacity, these cash assistance programs do not reach all those in need and do not allow recipients to meet even their most basic needs, much less provide a real path out of poverty or help them build toward economic security. The various financial gaps outlined in this report paint a big picture of a program in need of extensive reforms to better support individuals and families. Benefit levels need to be increased substantially. The state needs to end the punitive impact of work requirements and asset limits. These are bold changes. But bold change is what these programs need if our state is to ensure economic security and opportunity for New Yorkers with the lowest incomes.

Appendix: Methodology

To begin our analysis of financial gaps in the benefits system, we conducted a comprehensive literature review of several programs, including TANF, the Supplemental Nutrition Assistance Program (SNAP), Medicaid, the Essential Plan, the New York State Child Care Block Grant Subsidy Program, and housing programs such as Section 8, the Family Homelessness Eviction Prevention Supplement (FHEPS) program, and CityFHEPS. During our literature review, we also interviewed various experts, including providers, FPWA member organizations, and researchers from think tanks, nonpartisan policy institutes, and other nonprofit organizations. These conversations helped us clarify the key financial gaps in each of our programs of interest. After concluding a series of interviews, we decided to focus on the TANF-funded Family Assistance (FA) and state-funded Safety Net Assistance (SNA) programs for the reasons outlined in the Introduction section of this report.

In order to better quantify some of the financial gaps in the FA and SNA programs, we submitted several Freedom of Information Law (FOIL) requests to the New York State Office of Temporary and Disability Assistance (OTDA) to obtain additional data on the financial gaps we identified. We also conducted analyses of publicly available information, including data from the U.S. Census Bureau, to deepen our analysis of the gaps in these programs. Finally, we engaged FPWA's Advisory Committee, a group of policy experts, attorneys, and providers that FPWA first convened in 2020 for our analysis of benefits cliffs. We continued to convene this committee for this report, and their discussions and expertise throughout the process helped guide the direction of our research and bring insight to our findings.

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