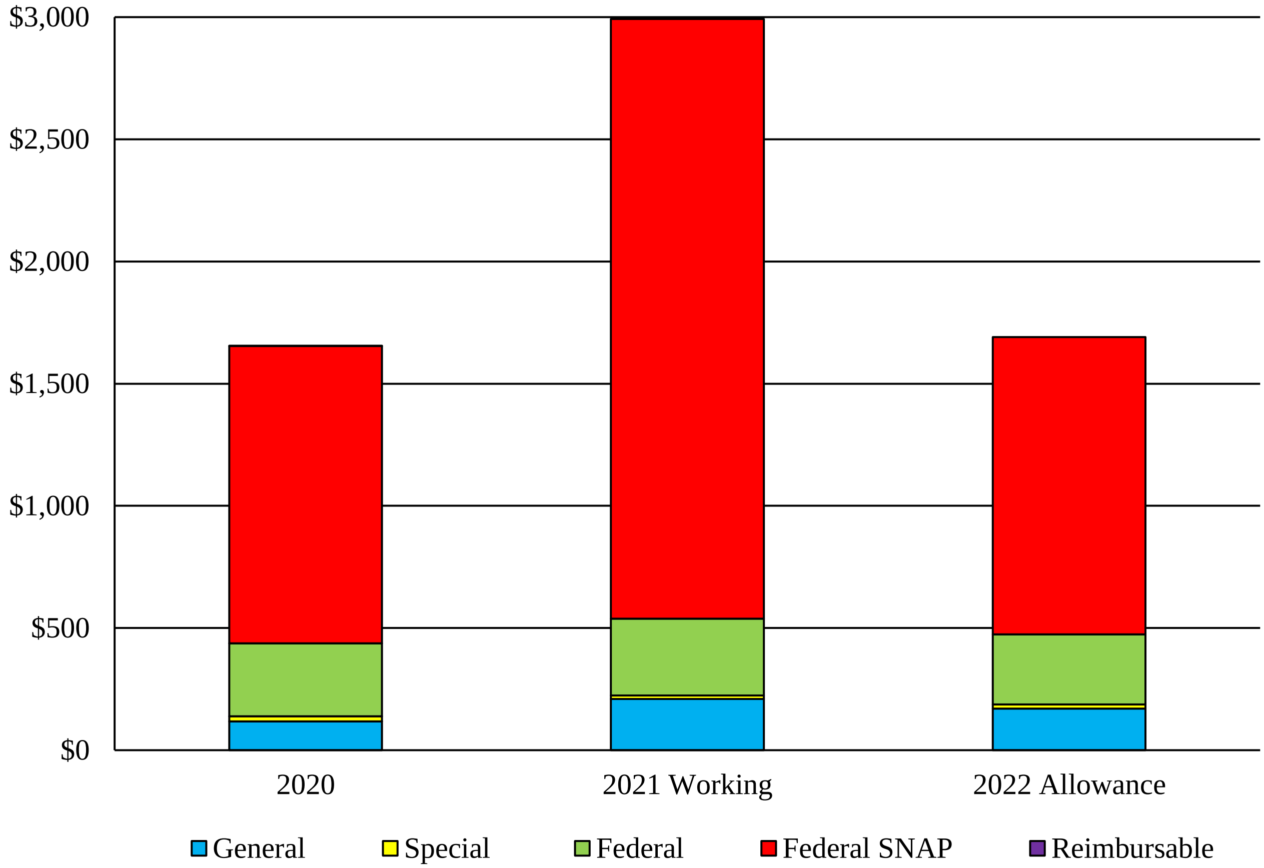
Family Investment Administration
Department of Human Services

Executive Summary

The Department of Human Services (DHS) Family Investment Administration (FIA) administers cash benefits and other grant programs that provide assistance to individuals and families in financial need as well as employment programs to promote self-sufficiency.

Operating Budget Summary

Fiscal 2022 Budget Decreases by $1.3 Billion, or 43.5%, to $1.7 Billion
($ in Millions)



SNAP: Supplemental Nutrition Assistance Program

Note: Fiscal 2021 includes deficiency and supplemental deficiency appropriations and general salary increases. Fiscal 2022 includes annual salary review adjustments and the annualization of general salary increases.

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- After accounting for deficiency and supplemental deficiency appropriations and statewide personnel adjustments, the decrease in the fiscal 2022 allowance for FIA totals $1.3 billion, of which $1.29 billion is in the Assistance Payments Program. Excluding that program, the remaining portion of the FIA budget decreases by $12.8 million.

- The largest component of the decrease is Supplemental Nutrition Assistance Program (SNAP) funding ($1.2 billion) to account for a return to more typical benefit levels, after stimulus-related increases including the Pandemic Electronic Benefits Transfer (P-EBT) benefits, and caseload declines. However, the SNAP spending is likely significantly understated in both fiscal 2021 and 2022.

- In addition, Temporary Cash Assistance (TCA) funding in fiscal 2022 decreases by $53.7 million from a combination of an anticipated caseload decline due to economic improvements and the elimination of a temporary benefit increase in fiscal 2021. The Department of Legislative Services (DLS) forecasts a shortfall of approximately $10.3 million in fiscal 2022.

- Temporary Disability Assistance Program (TDAP) funding in fiscal 2022 is likely understated due to the impact of the Recovery for the Economy, Livelihoods, Industries, Entrepreneurs, and Families (RELIEF) Act, which provides for the reenrollment of recipients whose cases closed during fiscal 2021. DLS estimates that there will be approximately 16,900 TDAP recipients in June 2021, due to the reenrollments and any new applications. Though the fiscal 2022 budget accounted for some reenrollment in TDAP compared to year-to-date levels, the level of reenrollment authorized in the RELIEF Act is higher than was anticipated. As a result, given the uncertainty in how many of the reenrolled TDAP recipients will no longer qualify due to time limits or other factors after the prohibition on terminating benefits expires on July 1, 2021, it appears likely that the program will experience some funding shortfall in fiscal 2022. However, the exact level is unknown.

Key Observations

- ***COVID-19 Flexibilities Impact Work Requirements:*** Work requirements for TCA recipients were suspended in response to the COVID-19 pandemic through September 30, 2020. Following that date, modified work requirements went into effect, which will remain in effect through the public health emergency. Under this modification, DHS reports that most TCA recipients qualify for good cause exemptions and are not subject to work sanctions. As a result of the Families First Coronavirus Response Act (FFCRA), work requirements for able-bodied adults without dependents (ABAWD) receiving SNAP are suspended throughout the public health emergency.

- ***P-EBT Benefits for 2020-2021 School Year Pending Federal Approval:*** The FFCRA authorized P-EBT benefits to replace the value of meals provided to children eligible for free and reduced-price meals due to school closures and reduced hours/operations. For the

2019-2020 school year and September 2020 closures, $214.9 million of P-EBT benefits were provided in Maryland. Although initially lapsing September 30, 2020, the Continuing Appropriations Act of 2021 extended and expanded the program for the current school year. DHS is awaiting approval of its plan for benefit distribution. When the plan is approved, benefits will be retroactive to October 2020.

Operating Budget Recommended Actions

1. Reduce general funds to account for the failure to revert $950,000 in the fiscal 2020 closeout process.
2. Adopt committee narrative requesting information on case closures by reason.
3. Adopt committee narrative requesting reports on the Summer Supplemental Nutrition Assistance Program for Children.
4. Adopt committee narrative requesting that the Pandemic Electronic Benefits Transfer benefits be identified separately in Supplemental Nutrition Assistance Program spending.
5. Adopt committee narrative requesting information on application processing times and denial rates.
6. Adopt committee narrative requesting that data on the Supplemental Nutrition Assistance Program Employment and Training Program be included in the Managing for Results submission.

Updates

- ***SNAP Final Rule Vacated:*** In December 2019, the U. S. Department of Agriculture issued a final rule that would have limited the ability of states to receive waivers related to the ABAWD time limit. Maryland, among other states, challenged this rule. The final rule was vacated in October 2020.

- ***Temporary Assistance for Needy Families (TANF) Reauthorization:*** The TANF program is currently operating under a temporary extension. The extension is scheduled to end on September 30, 2021.

Operating Budget Analysis

Program Description

The Department of Human Services (DHS) Family Investment Administration (FIA), through the local departments of social services (LDSS), administers cash benefits and other grant programs that provide assistance to individuals and families in financial need as well as employment and training programs to promote self-sufficiency. Benefit programs administered by FIA include:

- ***Temporary Cash Assistance (TCA):*** The State's largest cash assistance program provides financial assistance to dependent children and other family members due to death, incapacitation, underemployment, or unemployment of one or both parents. Although primarily federally funded through the Temporary Assistance for Needy Families (TANF) block grant, the State determines the eligibility criteria and benefit levels for cash assistance.

- ***Temporary Disability Assistance Program (TDAP):*** The State's cash assistance program for disabled adults provides a limited monthly benefit for individuals with a short-term disability (at least 3 months but less than 12 months) or long-term disability. If the individual has a long-term disability, they are required to pursue a Supplemental Security Income (SSI) application and receive a benefit until a final decision has been reached. The federal government reimburses the State for benefits paid during the processing of approved SSI applications.

- ***Supplemental Nutrition Assistance Program (SNAP):*** The federal program provides benefits to individuals and families solely for the purchase of food. These benefits are 100% federally funded. However, the State provides two supplemental benefits: (1) a program to support a minimum benefit of $30 for seniors; and (2) State matching funds for a supplemental benefit for children in the summer and in December, which began in fiscal 2021. Administrative costs of federal SNAP are split evenly between the State and federal government.

- ***Public Assistance to Adults:*** This State program provides payments to indigent clients residing in licensed assisted living homes, Project Home clients, and adult foster care clients.

- ***Emergency Assistance to Families with Children:*** This TANF-funded program provides financing assistance to resolve an emergency situation as defined by the LDSS.

- ***Welfare Avoidance Grants:*** These TANF-funded grants allow an LDSS to divert customers from cash assistance, when a one-time payment resolves a specific problem and allows the customer to become or remain independent.

- ***Burial Assistance Program:*** This State program subsidizes funeral expenses of public assistance recipients, youth in foster care, and Medicaid recipients.

LDSS, which are arms of DHS in each jurisdiction, are responsible for making eligibility determinations and redeterminations for the various benefit programs and certain populations in the Medicaid program, which is administered by the Maryland Department of Health.

FIA also administers the Family Investment Program, which provides services including efforts to divert potential TCA applicants through employment, move recipients to work, and provide job retention services to enhance skills and prevent recidivism. The goal of the program is to assist TCA applicants/recipients in becoming self-sufficient. After assessing each family's specific needs and resources, staff focus on the services required to move clients into work. Local departments have the flexibility to determine what training and job search activities will be required of applicants. In addition, LDSS are responsible for networking with employers and determining the most appropriate job training.

Two other programs are administered through FIA. The Maryland Office for Refugees and Asylees (MORA) oversees a federally funded refugee resettlement program that provides services to refugees and asylees residing in Maryland. These services are primarily provided by local resettlement agencies through grants from MORA. The Office of Grants Management provides funding to government and community-based organizations for hunger programs and other community initiatives.

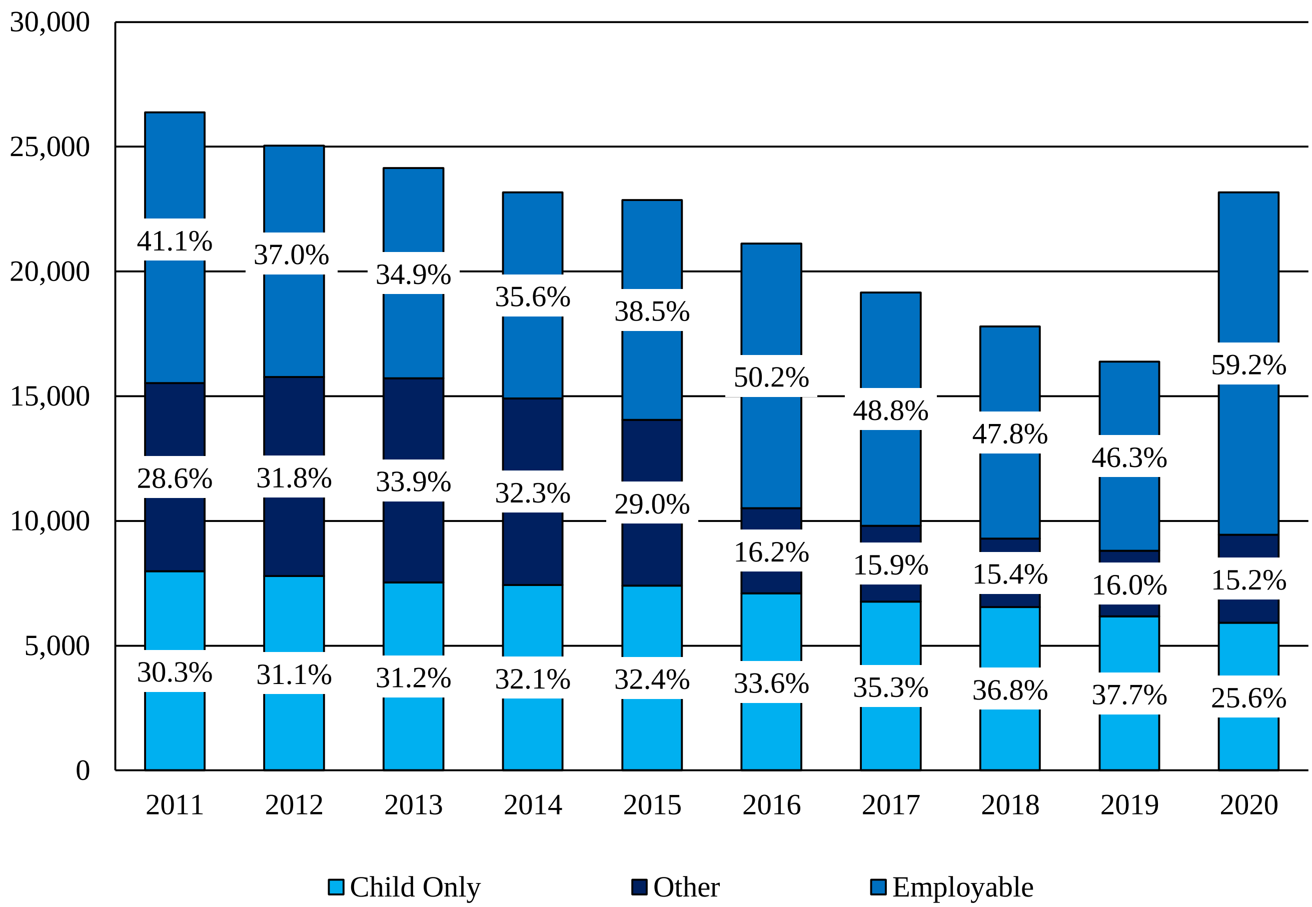
Performance Analysis: Managing for Results

1. TCA Caseload Characteristics Impacted by COVID-19 Recession

The TCA caseload can be divided into two main groups: (1) the core caseload; and (2) cases headed by an employable adult. Core cases include child-only cases, cases with children under the age of one, caretaker relatives, and other cases exempt from work requirements. Prior to federal fiscal 2016 (October 1, 2015), cases with individuals with a long-term disability were work exempt. However, following this date, these cases were subject to work requirements. The current status of work requirements are discussed in Issue 1.

Exhibit 1 presents information on TCA cases (which may consist of multiple recipients) in July 2020 compared to prior years. These cases are categorized into employable, child only, and other. Other cases represent all other core cases except child-only cases. In general, as employable adults successfully enter the labor market, core cases represent a larger share of the TCA caseload. This pattern generally alters during and immediately after recessions. The recent exception to this pattern was the policy change regarding individuals with long-term disabilities, which increased the share of cases classified as employable by 11.7 percentage points between July 2015 and July 2016. In July 2016, over 50% of cases were considered employable, the highest share since July 2004. In subsequent years, the share of cases considered employable resumed the typical trend of declines, while remaining elevated compared to the years prior to the policy change.

Exhibit 1
TCA Caseload and Share of TCA Caseload That Is Work Eligible or Work Exempt
July 2011-2020



TCA: Temporary Cash Assistance

Source: Department of Human Services; Department of Legislative Services

The TCA caseload began rising in March 2020, as various parts of the economy were shut down to slow the spread of COVID-19. The increase in caseload continued for several months at an unprecedented pace, peaking in June 2020. As a result, the July 2020 data in Exhibit 1 does not reflect the full impact of the COVID-19 recession on the TCA caseload. The number of cases in that month (23,176) was 41.4% higher than in July 2019 (16,391) and the number of recipients was 73.3% higher than the prior year. In addition to an unprecedented rate of increase, the COVID-19 recession led to a substantial shift in the characteristics on the caseload. The share of cases considered employable increased by 12.9 percentage points between July 2019 and July 2020, an increase of 6,137 cases. The majority of this increase occurred among cases considered work eligible – no earnings (5,108). The share of employable cases in July 2020 (59.2%) was the highest of any July dating back to at least 2001. In fact, only four prior July's between 2001 and 2020 had shares of employable cases exceeding 50%. The current status of work requirements is discussed in Issue 1.

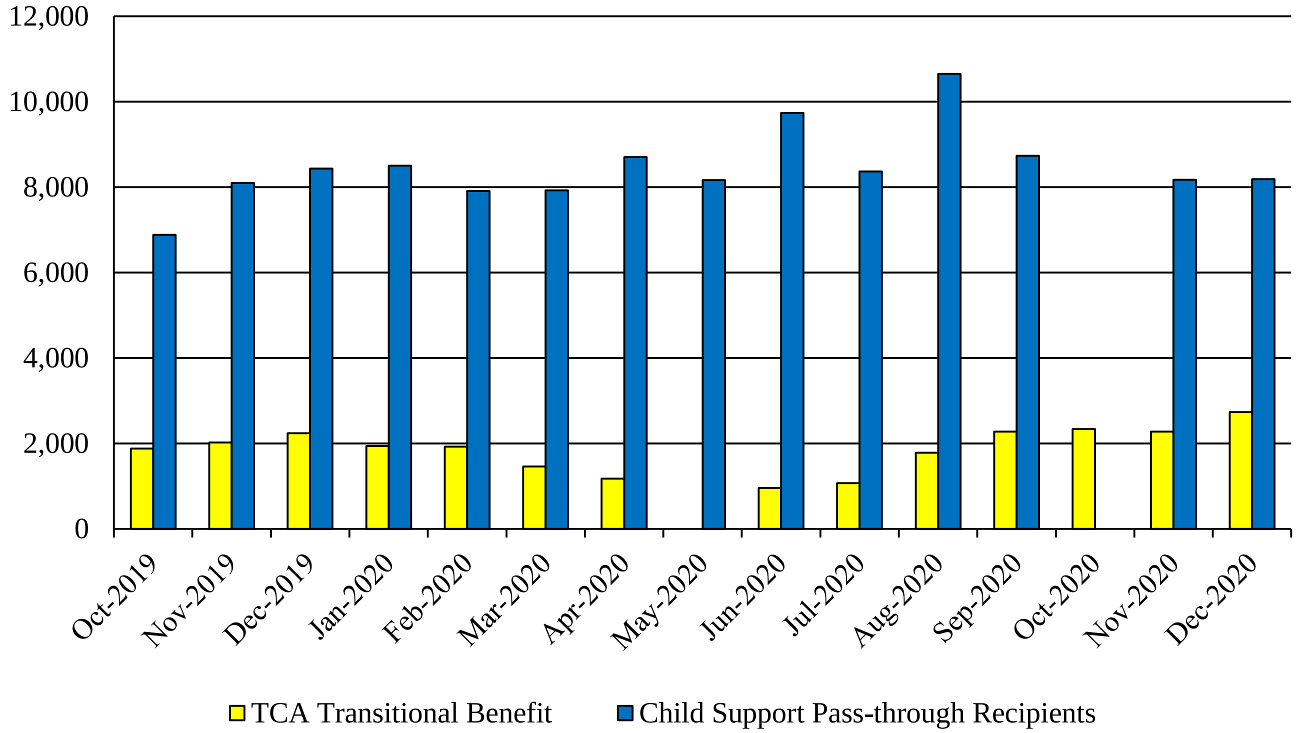
The number of child-only cases decreased slightly between July 2019 and July 2020, a decrease of 250 cases. However, due to the substantial increase in employable cases, the share of TCA cases that was child-only decreased by 12.1 percentage points to 25.6% in July 2020. The share of child-only cases was the lowest of any July dating back to at least 2001.

2. Caseloads for New Programs Impacted by COVID-19

In fiscal 2020, FIA implemented two new programs: (1) a transitional benefit for households leaving TCA due to employment-related reasons; and (2) a child support pass-through. The TCA transitional benefit, funded through TANF, provides an additional three months of benefit at the same level as was received by the household prior to exiting TCA for these reasons. The child support pass-through distributes a maximum of $100 of child support collections for the first child and $200 for two or more children to TCA recipients. Previously, all TCA-related child support collections were retained with half used to reimburse the State and half to reimburse the federal government. This initiative was required under Chapters 737 and 738 of 2017.

As shown in **Exhibit 2**, the number of recipients of the TCA transitional benefit declined substantially following the beginning of the COVID-19 pandemic and the related business closures and reduced operations. Excluding the ramp up period of the program in fiscal 2020, from October 2019 through February 2020, there were an average of 2,001 recipients of this benefit per month. However, from March 2020 through July 2020, the peak period of economic impacts from the COVID-19-related closures, the average number of recipients dipped to 1,164. Following the partial reopening of many businesses and the improvement in the economy, the number of recipients has generally increased and was at its highest level in December 2020 (2,736). The fiscal 2022 allowance anticipates recipients at a level near the current trends.

Exhibit 2
Recipients of TCA Transitional Benefit and Child Support Pass-through
October 2019-December 2020



TCA: Temporary Cash Assistance

Note: Excludes July 2019 through September 2019, due to data from the ramp up periods of these programs not being comparable to the following periods. In addition, each benefit type is missing data for one month (TCA transitional benefit in May 2020 and child support pass-through in October 2020) due to data reporting issues.

Source: Department of Human Services

As shown in Exhibit 2, the number of recipients of the child support pass-through has fluctuated during the initial year and a half of operations. This is generally consistent with the dueling impacts of the COVID-19 recession on child support collections broadly. The first round of economic impact payments (stimulus payments), which could be intercepted for past due child support, along with increased and expanded unemployment benefits, increased child support collections on arrears and to some degree current collections, while the reduced economic activity more broadly had the impact of reducing some current collections. This issue is discussed in the DHS Child Support Administration analysis. This program had not been included in either the fiscal 2020 or 2021 budget, but funds related to the distribution were added by budget amendment in fiscal 2020. The Department of Legislative Services (DLS) anticipates a similar addition in fiscal 2021. The fiscal 2022 allowance includes funding for this program at the same level as was distributed in fiscal 2020.

Fiscal 2020

Language in the fiscal 2020 Budget Bill (Chapter 565 of 2019) restricted $950,000 of general funds in the Local Family Investment Program to be used only for a grant for a not-for-profit 501(c)(3) association that advocates on behalf of Community Action Agencies (CAA) and partnering organizations that serve individuals and families with low incomes who reside in Maryland to support the transition of CAAs or other community organizations to a Two-Generation Model of service delivery. When funds are restricted in this manner, if the funds are not used for the restricted purpose, the funds are required to revert to the General Fund. Although the restricted funds were not released, DHS awarded a grant for this purpose to the Maryland Community Action Partnership.

Despite the requirement to revert the restricted but unreleased funds at the fiscal 2020 closing, the restricted funds were not reverted. **DLS recommends reducing the budget of DHS by $950,000 to reflect the funds that were required to revert but were not reverted.**

Fiscal 2021

Proposed Deficiency

The fiscal 2022 budget includes five deficiency appropriations for FIA, including two in Supplemental Budget No. 1:

- $1.1 billion for SNAP benefits due to increased caseloads and benefit levels, including September payments for the Pandemic Electronic Benefits Transfer (P-EBT) program;
- $434.3 million for SNAP benefits to support P-EBT benefits for the 2020-2021 school year;
- $60.8 million ($38.1 million in general funds, $5 million in Child Support Offset Funds, and $17.7 million of TANF) to support higher than budgeted cash assistance caseloads;
- $37.2 million in general funds to provide an additional $100 per TCA recipient each month from January through June 2021; and
- $5.6 million in federal funds for The Emergency Food Assistance Program available from the December federal COVID relief legislation.

The additional Child Support Offset Funds (the State share of child support collections in TCA-related cases) are expected to be available due to higher than expected child support collections beginning in fiscal 2020 that have continued, in part, due to the additional unemployment benefits in the poor economic climate. The TANF included in the deficiency appropriation is the remaining balance in the program. As a result of the depletion of the TANF balance, beginning in fiscal 2022, DHS must limit TANF spending to the estimated annual revenue; resulting in a higher level of general fund spending in the program, despite lower overall anticipated costs.

Despite the substantial increase in SNAP spending included in the two deficiency appropriations, DLS anticipates that additional SNAP dollars (of more than $100 million) will need to be added through a budget amendment. The additional fiscal 2021 SNAP spending anticipated is a result of a combination of two factors: (1) the 15% increase in benefits from January 2021 through June 2021 included in the December federal COVID Relief legislation; and (2) higher than anticipated SNAP case counts as DHS resolved redetermination issues from earlier in the fiscal year.

Chapter 39 of 2021

Chapter 39 of 2021 (Recovery for the Economy, Livelihoods, Industries, Entrepreneurs, and Families (RELIEF) Act) impacts the budget of FIA in two ways: (1) providing additional funds for TDAP, discussed further in the proposed budget section of this analysis; and (2) providing $10 million of additional funds in fiscal 2021 to the Office of Grants Management for the Maryland Food Bank and the Capital Area Food Bank for distribution of funding and food to local food banks and pantries. Annually, DHS provides a general fund grant to these organizations. In fiscal 2021, a total of $4.5 million of general funds was provided to the food banks and the Maryland Emergency Food Program for these activities through the Office of Grants Management.

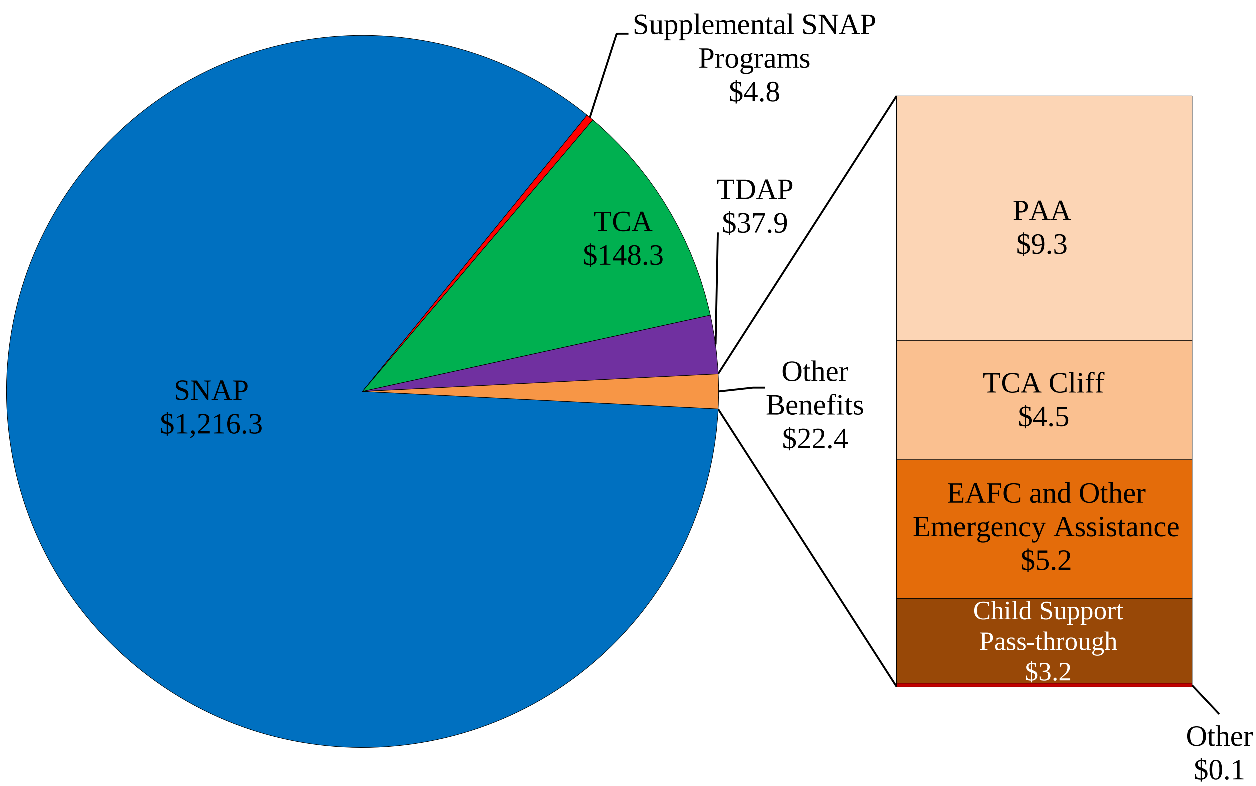
Cost Containment

FIA's fiscal 2021 appropriation was reduced by $256,278 in total funds ($111,088 in general funds, $5,170 in special funds, and $140,020 in federal funds) as a result of an across-the-board reduction to State agency unemployment insurance contributions approved at the July 1, 2020 meeting of the Board of Public Works.

Fiscal 2022 Overview of Agency Spending

The fiscal 2022 allowance of FIA totals $1.69 billion. Approximately 85% of FIA spending occurs in the Assistance Payments program, the program in which the benefit programs are budgeted. **Exhibit 3** provides information on the Assistance Payments spending by type of benefit. The vast majority of this spending is budgeted for SNAP, which comprises 72% of the total FIA budget. TCA benefits are budgeted at $148.3 million (8.8% of the allowance). All other benefit programs account for 3.8% of the fiscal 2022 allowance.

Exhibit 3
Assistance Payments Program Spending
Fiscal 2022 Allowance
($ in Millions)

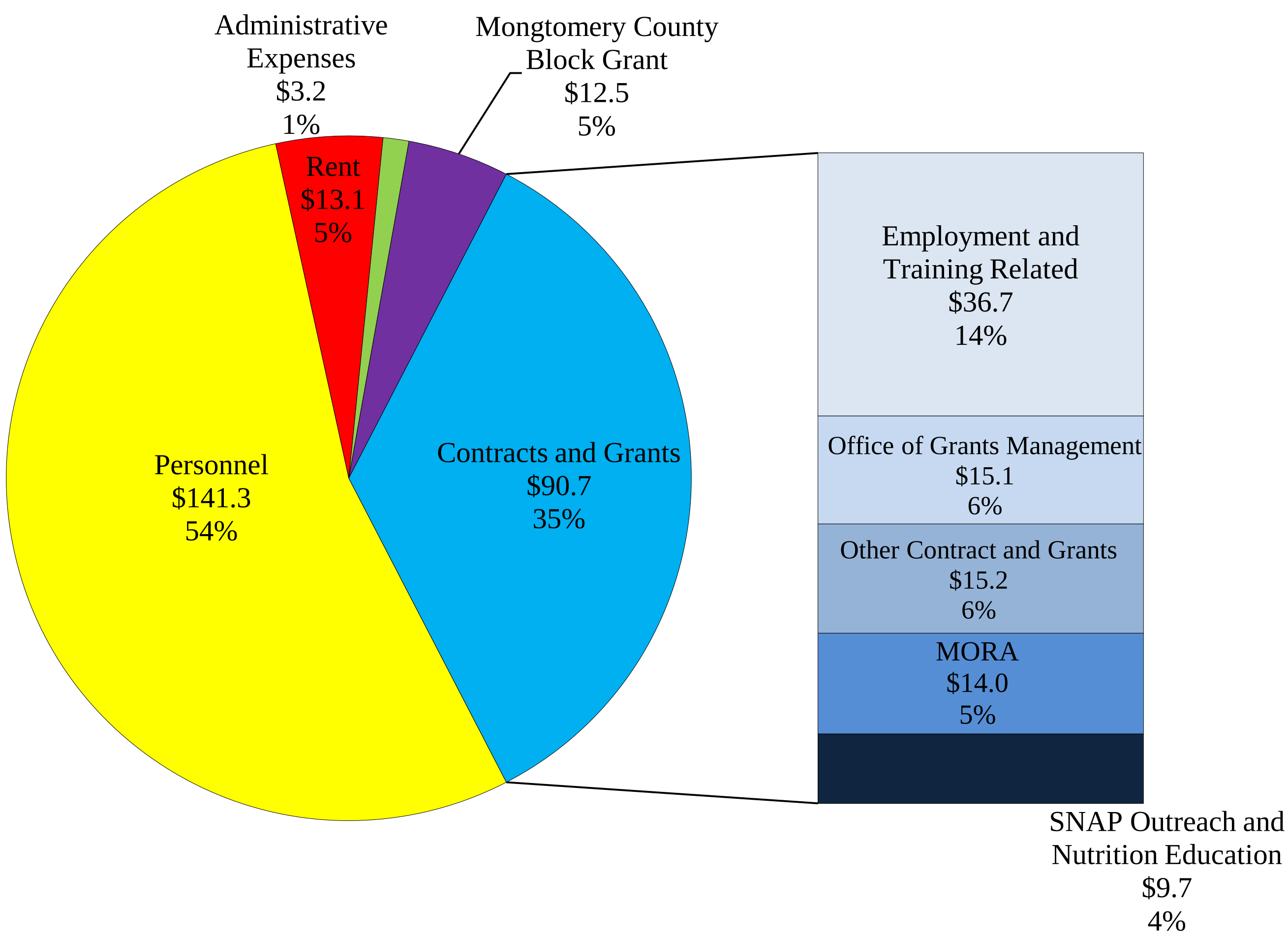


EAFC: Emergency Assistance to Families with Children
PAA: Public Assistance to Adults
SNAP: Supplemental Nutrition Assistance Programs
TCA: Temporary Cash Assistance
TDAP: Temporary Disability Assistance Program

Source: Department of Human Services; Department of Budget and Management; Governor's Fiscal 2022 Budget Books

As shown in **Exhibit 4**, excluding Assistance Payments, the budget of FIA totals $260.7 million, of which 54% is for personnel, including contractual employee payroll and other technical assistance, primarily in LDSS. Contracts and grants comprise 40% of this spending. Employment- and training-related contracts and grants, which includes the SNAP Employment and Training (E&T) program, the Noncustodial Parent Employment program, and the Work Opportunities program under TANF, total $36.7 million, or 14% of this spending. This spending also includes transportation and other assistance to individuals to support employment, in addition to employment and training programs. The Montgomery County Block Grant totals 5% of FIA spending outside of Assistance Payments. Montgomery County receives a block grant for child welfare, adult services, family investment, and administrative expenditures that allow the county to offer higher pay and other flexibility. The same type of spending in other jurisdictions would be split among personnel, administrative, and other contracts and grants spending.

Exhibit 4
Spending by Activity, Excluding Benefits
Fiscal 2022
($ in Millions)



MORA: Maryland Office for Refugees and Asylees
SNAP: Supplemental Nutrition Assistance Program

Note: Includes annual salary review adjustments and the annualization of general salary increases.

Source: Governor's Fiscal 2022 Budget Books; Department of Legislative Services

Proposed Budget Change

As shown in **Exhibit 5**, the fiscal 2022 allowance of FIA decreases by $1.3 billion, or 43.5%, after accounting for deficiency and supplemental deficiency appropriations and statewide personnel adjustments. Excluding Assistance Payments, the fiscal 2022 allowance of FIA decreases by $12.8 million, or 4.7%, compared to fiscal 2021. The largest decrease ($5.6 million) is the result of additional federal funds for the value of additional food commodities in The Emergency Food Assistance Program in fiscal 2021 for COVID-19 relief. Personnel expenditures decrease by $3.7 million, largely due to the abolition of 60 long-term vacant positions. In addition, rent decreases by $2.2 million due to a statewide effort to reduce office space.

Exhibit 5
Proposed Budget
Department of Human Services – Family Investment Administration
($ in Thousands)

How Much It Grows:	General Fund	Special Fund	Federal Fund	Reimb. Fund	Total
Fiscal 2020 Actual	$118,125	$21,132	$1,514,944	$1,345	$1,655,546
Fiscal 2021 Working Appropriation	209,609	14,368	2,768,364	0	2,992,341
Fiscal 2022 Allowance	170,056	17,564	1,502,827	0	1,690,446
Fiscal 2021-2022 Amount Change	-$39,554	$3,196	-$1,265,537	$0	-$1,301,895
Fiscal 2021-2022 Percent Change	-18.9%	22.2%	-45.7%		-43.5%

Where It Goes:	Change
Personnel Expenses	
Annualization of 2% general salary increase effective January 1, 2021	$1,136
Restoration of one-time reduction in unemployment insurance contributions	242
Turnover adjustments	168
Annual salary review adjustments for a one grade increase for positions in fiscal services classifications and to increase 11 positions to $15 per hour	75
Employee retirement	-389
Regular earnings due to budgeting of vacant positions at lower salary levels	-476
Employee and retiree health insurance	-1,364
Abolition of 60 long-term vacant positions	-3,051
Other fringe benefit adjustments	-67
Assistance Payments	
Child Support Pass-through Payments not included in the fiscal 2021 working appropriation	3,206
TDAP due to a 2.9% anticipated caseload increase and the mandated increase in benefits from 74% to 78% of TCA benefit for one-person household (about $9)	2,401

Where It Goes:	**Change**
Welfare avoidance grants to align with actual experience	-144
Emergency assistance to reflect elimination of local funds consistent with recent experience	-321
Emergency Assistance to Families with Children to align with recent experience in pandemic as impacted by eviction and utility moratoria	-1,309
TCA transitional benefit based on current spending levels	-1,790
TCA due to a 14.5% anticipated caseload decline partially offset by aligning the average monthly grant with recent experience	-16,484
Temporary benefit increase for TCA recipients ($100 per month) from January to June 2021	-37,221
SNAP to align spending with recent experience after caseload and benefit increases due to COVID-19 and the provision of P-EBT benefits in the 2020-2021 school year in fiscal 2021	-1,237,464
Employment and Training Programs	
SNAP Employment and Training Program primarily to account for increased third-party partner organizations offering programs consistent with recent experience	2,333
Job access and reverse commuting program to support transportation costs related to accessing employment opportunities to align with experience	-220
Noncustodial Parent Employment Program transportation costs offset by lower costs due to impacts of the pandemic on program activity	-820
Work Opportunities Program contracts and grants to align with recent experience due to impacts of the pandemic on program activity	-2,317
Other Expenses	
Contractual turnover expectancy inadvertently excluded from the Work Opportunities Program	287
Electricity to align with recent experience based on reduced activity in offices	-150
Clerical and other support primarily in the Work Opportunities Program to align with experience as impacted by the pandemic	-234
Rent due to a statewide effort to reduce office space	-2,196
Additional federal support for COVID relief in The Emergency Food Assistance Program in fiscal 2021 provided through Supplemental Budget No. 1	-5,578
Other changes	-148
Total	**-$1,301,895**

P-EBT: Pandemic Electronic Benefits Transfer
SNAP: Supplemental Nutrition Assistance Program
TCA: Temporary Cash Assistance
TDAP: Temporary Disability Assistance Program

Note: Numbers may not sum to total due to rounding. Fiscal 2021 includes deficiency and supplemental deficiency appropriations and general salary increases. Fiscal 2022 includes annual salary review adjustments and the annualization of general salary increases.

The other primary areas of decrease are employment and training program contracts and grants, a net $1.1 million to align with fiscal 2020 actual expenditures. Despite the overall decrease, the SNAP E&T program increases by $2.3 million to account for additional third-party partners providing programs. The largest employment- and training-related decrease occurs in the Work Opportunities Program contracts and grants, a decrease of $2.3 million. While aligning with recent expenditures generally makes sense from a budgetary perspective, the impact of the pandemic on job-related programs makes fiscal 2020 spending unusual. The level of expenditures in that year was the lowest in more than five years. TANF is the exclusive source of funding for the Work Opportunities program. Given that the DHS budget, in total, uses all TANF estimated to be available to the agency in fiscal 2022, DHS would therefore be unable to increase spending if activities return to normal levels in that year. **DHS should comment on how it could support a return to more typical employment and training activities for TCA recipients, given the TANF-related constraints and limitations on co-mingling with other employment and training fund sources.**

Benefits and Services to Clients

The fiscal 2022 allowance for the Assistance Payments program decreases by $1.29 billion compared to the fiscal 2021 working appropriation.

SNAP and Supplemental SNAP Benefit for Seniors

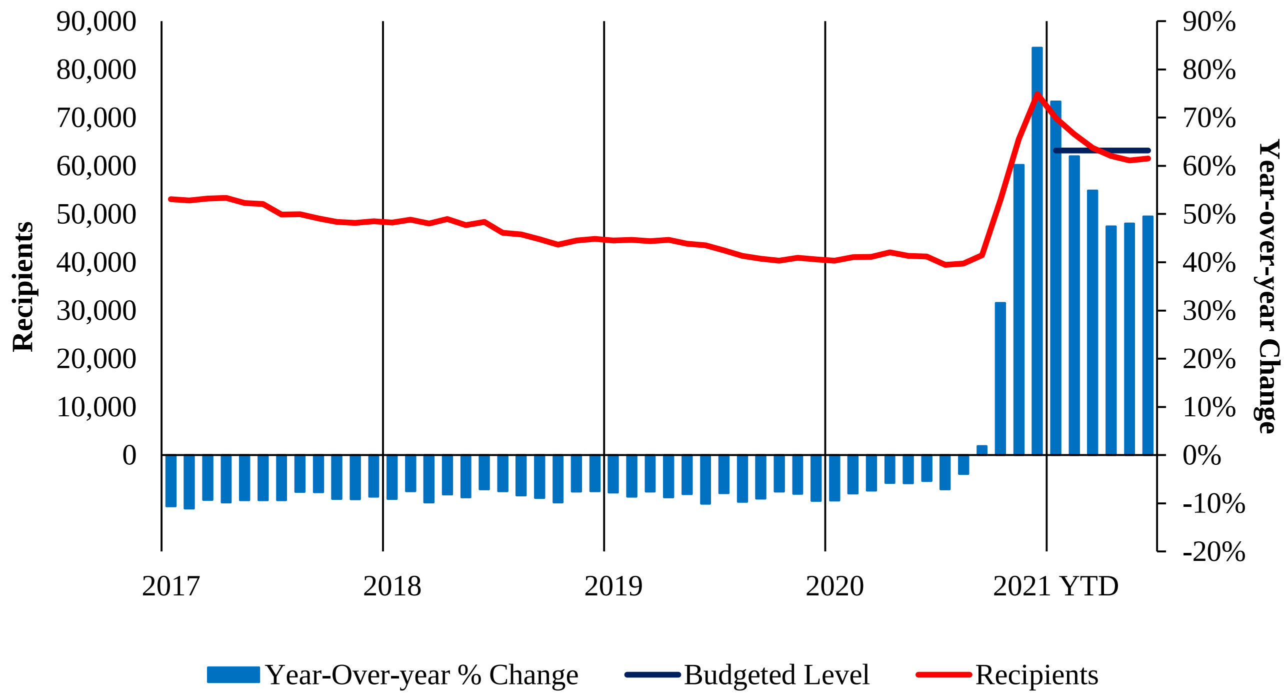
The largest component of the decrease in Assistance Payments spending ($1.24 billion) occurs for SNAP, which is budgeted at the actual level of fiscal 2020 spending. The level of spending for fiscal 2022 is highly uncertain in part due to the unknown timing of the end of the public health emergency that will trigger the end of the emergency allotments (discussed in Issue 1). Although the majority of fiscal 2020 had relatively low caseloads and typical benefit levels, the SNAP spending for that year also includes the majority of payments related to the P-EBT benefits from the 2019-2020 school year, which vastly increases spending over what might otherwise have occurred. As a result, even though it is at the same funding level, the fiscal 2022 SNAP budget can support a higher caseload than was funded in fiscal 2020. Nevertheless, DLS projects a potential deficit of approximately $0.2 billion due to the higher caseload levels. As these benefits are 100% federally funded, there is no State impact of any potential shortfall. Any additional spending will be added to the budget by budget amendment or deficiency appropriation.

The SNAP Emergency Allotment program has effectively, temporarily eliminated the Supplemental SNAP Benefit for Seniors program. This program provides the difference between the benefit received by households with an individual over the age of 62 and $30 (generally $14 because the minimum benefit is $16). Because all SNAP households receive the maximum allotment, no seniors are receiving less than $30. As a result of the emergency allotments, none of the funding for fiscal 2021 for the program is expected to be used ($4.6 million). As a result, these general funds will be available to support forecasted shortfalls in TCA and TDAP. The fiscal 2022 allowance assumes the Supplemental SNAP Benefit for Seniors Program is active for the whole fiscal year, by budgeting at the same level as had been planned for fiscal 2021. The number of recipients in the program when it returns is uncertain and this seems like a reasonable estimation strategy. DLS anticipates that the emergency allotments will be available through at least until September 2021. Therefore, approximately $1.1 million of general funds could be available to assist with forecasted shortfalls in TCA and TDAP in fiscal 2022.

TCA Caseload and Expenditure Trends

As shown in **Exhibit 6** and discussed in more detail in the DHS Overview analysis, the number of TCA recipients began to decrease rapidly following the end of the six-month extension on recertifications. In October 2020, DHS re-implemented these extensions through March 2021, and by December 2020, the TCA recipient count had stabilized. The level of funding provided in the deficiency appropriation would allow for an average of 63,156 recipients throughout the year, slightly below the year-to-date average (64,145). DLS estimates that the number of recipients will increase through the remainder of the fiscal year, as recipients terminated during the recertification period reenter the program. However, DLS forecasts that the number of recipients will stay below the levels experienced at the beginning of the fiscal year due to the general economic improvement, which will allow the average number of recipients to continue to decline through the remainder of the year.

Exhibit 6
Temporary Cash Assistance Recipients
Fiscal 2017-2021 (through December)



YTD: yea –to date

Source: Department of Human Services; Department of Budget and Management; Department of Legislative Services

As shown in **Exhibit 7**, for fiscal 2021, DLS projects a similar caseload to the level assumed in the deficiency appropriation. However, DLS anticipates a fiscal 2021 shortfall of approximately $4.7 million in the program, primarily due to a higher average benefit level consistent with recent average monthly payments. The general fund shortfall is expected to be slightly lower than the overall shortfall due to TANF anticipated to be available from the TCA transitional benefit program. The current rate of expenditures in that program indicates that at least $1.3 million of the funding for that program will not be needed, due to the impacts of the pandemic on the program earlier in the year. These funds would then be available to be used to reduce the TCA shortfall. DLS anticipates a larger shortfall ($10.3 million) in fiscal 2022 due to a slower anticipated rate of caseload declines, despite a lower estimated monthly payment. DLS anticipates that SNAP-related benefit increases will be sufficient to address inflationary increases in the Maryland Minimum Living Level.

Exhibit 7
Temporary Cash Assistance Enrollment and Funding Trends
Fiscal 2020-2022

	2020	Working Approp. 2021	DLS Estimate 2021	Budget Estimate 2022	DLS Estimate 2022	%Change 2021-2022
Average Monthly Enrollment	46,767	63,156	63,285	55,137	59,488	-6.0%
Average Monthly Grant (Excluding Temporary $100 Per Recipient Increase)	$217.03	$217.39	$222.14	$224.09	$222.14	0.0%
Budgeted Funds ($ in Millions)						
General Funds	$2.8	$78.4	$81.8	$45.6	$55.9	-31.7%
Total Funds	**$121.8**	**$202.0**	**$206.7**	**$148.3**	**$158.6**	**-23.3%**
Estimated Shortfall			**-$4.7**		**-$10.3**	
Estimated General Fund Shortfall			-3.4		-10.3	

DLS: Department of Legislative Services

Note: Overall funding, estimated funding, and shortfall calculations for fiscal 2021 include the temporary benefit increase of $100 per recipient per month from January through June 2021. However, the average monthly grant shown excludes that benefit. The percent change compares the DLS estimates.

Source: Department of Human Services; Department of Budget and Management; Department of Legislative Services

TDAP Caseload and Expenditures

As discussed in the DHS Overview analysis, the number of TDAP recipients fell to historic lows (7,491 in December 2020) following a June peak (17,358) primarily due to case closures during recertifications that were required in the early months of the fiscal year, in part, due to documentation issues (particularly medical certification of disability). The December 2020 level of recipients was more than 30% below the pre-pandemic level. However, these recipient levels will not reflect the full level of payments for this period.

- ***DHS Reenrollment and Retroactive Payment Plan:*** On February 2, 2021, DHS began working to reenroll TDAP recipients that had cases closed due to medical certification issues, other verification issues, and a failure to reapply during the months of July through November 2020. DHS intends to provide retroactive payments back to when the case closed. DHS indicated that this plan was intended to recognize the difficulty in accessing medical care, mail delays, and other barriers that prevented TDAP recipients from being recertified.

- ***RELIEF Act:*** Chapter 39 (RELIEF Act) makes additional changes to TDAP for fiscal 2021, in particular it:

  - requires reenrollment of all TDAP recipients who were denied benefits on or after July 1 (unless the closure was the result of a final determination on a SSI application), a broader plan than DHS proposed. The bill also provides retroactive payments for these recipients. **DHS should discuss the timeline for completing the RELIEF Act reenrollments and issuing the retroactive payments;**

  - prevents case closures for reasons other than a final determination on an SSI application through the remainder of fiscal 2021; and

  - provides a $100 per month additional benefit to all TDAP recipients (including those reenrolled) through June 2021, consistent with the Governor's announcement of a similar plan for TCA recipients. However, the TDAP benefit increase will only occur with the enactment of the legislation. **DHS should comment on if it anticipates providing the additional $100 beginning in February or whether this would begin in March.**

As introduced, the budget did not specifically account for the DHS proposal to reenroll and provide retroactive payments for TDAP recipients. However, depending on caseload trends for the remainder of the year, this action was potentially affordable within the existing budget due to the underspending in the early part of the year relative to the caseload that the budget was built on. For example, in January 2021, the number of TDAP recipients was 6,966, relative to an estimated average monthly caseload of 12,142. As shown in **Exhibit 8**, the enrollment and benefit changes resulting from the RELIEF Act as estimated by DLS would lead to substantial shortfalls in fiscal 2021, if additional funding were not provided. However, the RELIEF Act authorizes sufficient additional funding to support these higher costs. The DLS forecast assumes the additional $100 benefit would be provided beginning in February 2021. In addition, DLS assumes that the vast majority of cases closed are reopened, including those with cases closed in June (first denied a benefit in July, consistent with the Act). However, DLS assumes that a portion of the cases remain closed for SSI-related reasons and assumes that some cases have already been reopened due to reapplication.

Exhibit 8
Temporary Disability Assistance Program Caseload and Enrollment Trends
Fiscal 2020-2022

	2020	Working Approp. 2021	DLS Estimate 2021	June 2021 DLS Estimate	2022 Budget Estimate
Average Monthly Enrollment	13,159	12,142	16,758	16,921	12,493
Average Monthly Grant (Excludes Temporary $100 Per Recipient Increase)	$214.15	$243.83	$239.90		$253.00
Budgeted Funds (in Millions)					
General Funds	$29.0	$29.8	$51.8		$32.4
Total Funds	**$33.8**	**$35.5**	**$56.7**		**$37.9**
Estimated Shortfall			**-$21.1**		
Estimated General Fund Shortfall			-$22.0		
Recovery Now Fund (RELIEF Act)			$22.0		
Shortfall After Recovery Now Fund			**$0.0**		

DLS: Department of Legislative Services
RELIEF: Recovery for the Economy, Livelihoods, Industries, Entrepreneurs, and Families

Note: The DLS forecast for fiscal 2021 assumes a $100 per month benefit increase from February through June 2021, consistent with the RELIEF Act. However, the average monthly grant shown in this exhibit excludes that temporary increase.

Source: Department of Human Services; Department of Budget and Management; Department of Legislative Services

The fiscal 2022 allowance is based on a caseload slightly higher than the fiscal 2021 appropriation, roughly similar to the levels of recipients during fiscal 2020 prior to the pandemic. It also accounts for the mandated benefit increase from 74% to 78% of the TCA benefit for a one-person household (an approximately $9 estimated monthly increase). Due to the reenrollment from the RELIEF Act, DLS forecasts June 2021 enrollment in TDAP of 16,920 recipients. It is uncertain how many of those recipients will lose eligibility for the program when the prohibition on terminations from the program expires on July 1, 2021, due to reaching the short-term time limit of nine months, certification/verification issues, or SSI compliance issues. Given the level of reenrollment in TDAP anticipated as a result of the RELIEF Act, it appears likely that some level of shortfall in fiscal 2022 will occur in the program. However, the exact level of any shortfall is uncertain.

Much remains unknown about the economic recovery and how it will impact public assistance caseloads. In a typical recession, caseloads are slower to rise and fall than what we have seen during the COVID-19 recession. The budget as introduced was fairly optimistic in terms of recovery for TCA recipients but took a more cautious approach in TDAP. However, given the changes in TDAP due to the RELIEF Act, it is possible that both programs could experience shortfalls. **DHS should comment on how it would cover such a shortfall if it materializes, given that the TANF balance is expected to be depleted.**

Personnel Data

	FY 20 Actual	FY 21 Working	FY 22 Allowance	FY 21-22 Change
Regular Positions	1,992.30	1,993.30	1,933.30	-60.00
Contractual FTEs	69.89	70.00	70.00	0.00
Total Personnel	**2,132.19**	**2,063.30**	**2,003.30**	**-60.00**

Vacancy Data: Regular Positions

Turnover and Necessary Vacancies, Excluding New Positions	143.06	7.40%
Positions and Percentage Vacant as of 12/31/20	284.00	14.25%
Vacancies Above Turnover	140.4	

- At a December 2020 hearing before the House Appropriations Committee Health and Social Services subcommittee, FIA indicated that it planned to fill 90 vacant positions to assist in case management and eligibility determination. DHS states that, as of February 5, 2021, it has made selections for hiring 15 of the positions with interviews scheduled for more than half of the 75 remaining positions. The complement of 90 positions are expected to be filled by the end of March 2021. DHS anticipates that the new hires will be able to assist with case management/eligibility determination within three weeks after the start date. The anticipated timing coincides with the planned beginning of recertifications across the programs.

- The fiscal 2022 allowance abolishes 60 long-term vacant positions in FIA, 43 of which are in the Local Family Investment Program. All of the positions had been vacant since at least calendar 2019. Of the abolished positions in the Local Family Investment Program, nearly half are in positions that would not be used for case management or eligibility determinations.

- After accounting for the abolished positions, FIA would have 224 vacant positions, a vacancy rate of 11.6%. This level of vacancies is 80.94 positions higher than is needed to meet its turnover expectancy. With the planned and ongoing filling of 90 positions to assist in case management and eligibility determinations, FIA would have fewer positions than are needed to meet its turnover expectancy at the start of fiscal 2022 (if no additional positions become vacant).

Issues

1. Flexibilities during the COVID-19 Pandemic for Benefit Programs

As a result of the COVID-19 pandemic, additional flexibilities have been provided by both the federal and State government for public benefits. There have been two primary types of flexibilities provided: (1) flexibilities to increase/maintain access to benefits; and (2) flexibilities that increase the value of the benefits available. In general, DHS has applied the same flexibilities allowed under federal rules for SNAP benefits for the other public benefit programs. **Exhibit 9** provides information on some of the major flexibilities provided and the time periods for which these are available. While this exhibit includes P-EBT, the discussion of that program will occur in Issue 2 of this analysis.

Flexibilities to Increase/Maintain Access to Benefits

Statewide Processing

Prior to the pandemic, DHS conducted case processing within each jurisdiction based on where the individual/household applies or lives. However, beginning in late April 2020, DHS moved to a statewide processing model, which allows for the redistribution of work between jurisdictions. This change was necessary, in part, because of the record applications for SNAP and TCA received in April 2020 and subsequent higher than normal applications in other months during the pandemic, which have not been equally distributed across the State. These unequal distributions also do not generally follow the typical distribution of applications among jurisdictions. For example, in the months prior to the pandemic, Prince George's County represented approximately 15% of applications; in April 2020, it comprised over 25% of a much higher pool of applications. A similar trend occurred among TCA applications. These atypical patterns meant that staffing patterns across the State did not align with the work, absent this new statewide model.

Interview Requirements

The Families First Coronavirus Relief Act (FFCRA) authorized waivers of several interview requirements, specifically waiving any interview prior to initial approval or recertification, face-to-face interviews at application or recertification, and interviews for expedited benefits. These flexibilities were in effect through May 2020, as authorized under FFCRA. Maryland received extensions of these waivers in combination through July 2020. Beginning in August 2020, DHS was no longer authorized to waive initial and recertification interviews but it was granted extensions to continue to waive face-to-face interviews through October 2020. Under the federal Continuing Appropriations Act of 2021, DHS opted to waive these interview requirements through June 2021. For periods in which interviews were required, DHS was able to conduct these interviews over the telephone.

Exhibit 9
Major COVID-19-related Flexibilities

	Calendar 2020										Calendar 2021					
	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	March	April	May	June
SNAP Emergency Allotments													benefit available until end of state of emergency; date TBD			
Six-month Recertification Extension																
Waive Initial and Recertification Interviews																
Waive Face to Face Interviews																
P-EBT benefits								USDA published guidance for the 2020-2021 school year in November; Maryland not yet approved								
SNAP online purchases available																
Increase in Maximum SNAP Allotment																
Temporary TCA Benefit Increase																

P-EBT: Pandemic Electronic Benefits Transfer
SNAP: Supplemental Nutrition Assistance Program
TBD: to-be-determined
TCA: Temporary Cash Assistance
USDA: U.S. Department of Agriculture

Note: P-EBT benefits reflect dates for which benefits are provided, the benefits were issued in June/July for the March to June 2020 period and in September 2020 for that period. The number of days covered in the listed months varies. The waiver of initial and recertification interviews restarted on October 15, 2020. On October 15, 2020, DHS announced the six month recertification extension for November and December 2020, on October 26, 2020, DHS announced that it would apply to October 2020 and to January 2021 through March 2021 as well.

Source: Department of Human Services; U.S. Department of Agriculture; Governor's Office; Department of Legislative Services

Other Waivers/Flexibilities

In addition to these waivers, DHS granted some program specific waivers and flexibilities that eased access in maintaining benefits. These include:

- ***Telephone Applications:*** DHS has partnered with two organizations (Maryland Hunger Solutions and Benefits Data Trust) to take applications over the phone for customers unable to apply using the department's online customer portal.

- ***TDAP:*** Extending the time for recipients/applicants to submit documentation including medical certifications for 90 days at the beginning of the pandemic (generally expiring in June 2020); and

- ***TCA and SNAP:*** Suspending and/or modifying work requirements.

DHS indicates that the suspension of work requirements for TCA recipients ended effective October 1, 2020, at which point modified work requirements began. The modified requirements are expected to continue throughout the public health emergency. DHS reports that under the modified requirements, the majority of TCA cases are in a good cause designation given the child care and school situations and, therefore, not subject to the requirements. DHS reports that these individuals may choose to participate in work programs but are not subject to work sanction. The U.S. Department of Health and Human Services (HHS) is unable to waive the federal Work Participation requirement for state agencies for TANF. However, HHS indicates that it will be flexible in the use of good cause determinations for states that failed to meet the required Work Participation Rate due to the COVID-19 pandemic. This would reduce the risk that a state will be issued a penalty for failure to meet the rate in federal fiscal 2020 and 2021, making it easier for the State to offer this flexibility.

Able-bodied adults without dependents (ABAWD) recipients of SNAP may receive benefits for only 3 months in a 36-month period unless they are working or participating in an employment and training activity for at least 20 hours per week. ABAWD rules apply to individuals between the ages of 18 and 49. The FFCRA prohibits ABAWDs from being removed as a result of the time limit, unless a state offers an individual a spot in a work or workfare program from April 1, 2020, through the end of the month after the public health emergency declaration is lifted by the Secretary of HHS. Subsequently, Maryland received a statewide waiver from the U.S. Department of Agriculture (USDA) of ABAWD time limits effective in the fourth quarter of federal fiscal 2020. USDA generally grants these waivers for 12 months, indicating that Maryland's current waiver is in effect through June 30, 2021. In Maryland, work requirements for other SNAP recipients are always voluntary.

Flexibilities That Increase Benefits

Income Counted Toward Eligibility/Benefit Determination

The various stimulus legislation including the Coronavirus Aid, Response, and Economic Security Act; FFCRA; and Consolidated Appropriations Act of 2021 has provided individual relief through rebates and new higher levels of unemployment compensation, including the Pandemic Unemployment Assistance, Pandemic Unemployment Compensation, Pandemic Emergency Unemployment Compensation, and Lost Wage Assistance. The rebates/stimulus payments did not count as income toward income eligibility or benefit determinations.

Under typical income rules for public benefits, unemployment insurance compensation is counted as a form of income for purposes of determining program eligibility and benefit level calculations. Therefore, to the degree that households receive unemployment insurance the household may not qualify for benefits or might qualify for benefits at a lower level. While the Lost Wages Assistance (the additional $300 benefit provided after the additional pandemic unemployment assistance expired) was excluded as a form of income because it is funded through the Disaster Relief Fund, the other forms of additional unemployment benefits counted as a form of income similar to regular unemployment, potentially reducing benefit levels in some programs or making households ineligible for benefits. However, under the Consolidated Appropriations Act, these additional unemployment benefits have been excluded as a form of income for these purposes, allowing households to receive a higher level of benefits than they would otherwise qualify under typical rules for counting unemployment compensation or allowing the household to receive a benefit that they would not have qualified for with it included. Regular unemployment insurance compensation will continue to count as a form of income.

Benefit Levels

- ***SNAP Emergency Allotments:*** Allows a household to receive the maximum monthly allotment for their household size and is authorized for states until the Secretary of HHS rescinds the public health emergency declaration or the State-issued emergency or disaster declaration expires. Though the exact dollar impact of this change is difficult to quantify because it depends on the level each household was otherwise receiving, in general, benefits for SNAP cases have increased from an average of approximately $215 per month in the pre-pandemic portion of fiscal 2020 to approximately $354 in December 2020.

- ***Temporary Increase in SNAP Allotment (January through June 2021):*** Provides for a 15% increase in benefits (as authorized in the Consolidated Appropriations Act). The impact varies by household size, but for example, according to USDA, this change increases maximum SNAP allotments for a one-person household by $30 and a three person household by $81 per month.

- ***P-EBT Benefits:*** Benefits to replace the value of school meals for children that receive free and reduced-price meals when schools were in person (discussed further in Issue 2).

- ***TCA Temporary Benefit Increase (January through June 2021):*** Provides a $100 per recipient per month benefit.

In January 2021, USDA announced it is reviewing the potential for increasing benefits under emergency allotments for households which otherwise qualify for the maximum allotment (who do not benefit from the Emergency Allotment). The timing or impact of any such change is uncertain.

2. SNAP Benefits for Children Out of School

Even prior to the COVID-19 pandemic, the General Assembly was concerned about the impact of the periods of school closure (summer and winter breaks) on families' ability to feed children. The COVID-19 pandemic caused greater concern as children experienced extended school closures both in the 2019-2020 school year and the 2020-2021 school year. Recognizing these concerns, efforts have been made to provide households with benefits to account for the additional cost of feeding children when the children are not involved in fully in-person education.

P-EBT

The FFCRA authorized P-EBT benefits to provide the value of the federal daily reimbursement for free meals to children receiving free and reduced price meals (FRPM) but for whom schools were closed at least five consecutive days due to the pandemic. FRPM-eligible children include those who attend a Community Eligibility School at which all children receive free meals. This program operates through SNAP, with the cooperation of the school systems and state education agencies. The FFCRA authorization expired on September 30, 2021, and provided benefits primarily for school closures during the 2019-2020 school year. Some states (including Maryland) also received approval to provide benefits during the portion of the 2020-2021 school year that occurred prior to the expiration.

Administration/Implementation of Benefits

The effort to implement this program initially took some time as it required school systems, state departments of education, and human services agencies to work together to determine which children were eligible, how to connect data on eligible students with the state's human services systems information technology systems, and whether there was sufficient information available to provide the benefits (in particular, current addresses and parent/guardian information). Other complicating factors included that, in general, states did not have all the student data in one place, as the data is primarily maintained by individual school systems. States also had to submit a plan for approval to USDA before it could begin distributing benefits.

Kone Consulting produced a report on the implementation of these benefits based on the program as authorized under the FFCRA, under a contract with the Center on Budget and Policy Priorities and the Food Research & Action Center. According to Kone Consulting, Maryland provided benefits through:

- direct issuance for all eligible children (no separate application); one of 25 states plus Washington D.C., and the Virgin Islands to provide benefits this way. Kone Consulting indicated that based on the early reports, the direct issuance model worked best to distribute benefits;

- allowing households/children not already enrolled in FRPM but eligible to receive the benefit by applying for eligibility using the FRPM application; and

- issuing the P-EBT card to an individual student (or the oldest child) for non-SNAP households, 1 of 13 states issuing benefits this way with an additional 12 issuing benefits to at least some households this way. Sending the cards under the child's name allows benefits to be distributed more easily when insufficient data existed on the head of household and assists in accounting for shared custody.

DHS loaded September 2020 benefits onto these same cards for those still eligible. DHS also plans to issue the 2020-2021 school year benefits, when available, on the same cards for children with continuing eligibility. DHS notes that it used its new Eligibility & Enrollment system (which is otherwise still under development) to process benefits for non-SNAP households.

Benefits Provided Under the 2019-2020 School Year and September 2020 Programs

For the 2019-2020 school year, a benefit of $5.70 per day was provided per student. For September 2020, the benefit was $5.86 per day consistent with the federal reimbursement for free breakfast and lunch. In January 2021, USDA announced that the 2020-2021 school year benefit level would be increased to $6.82 to account for a snack as well as the breakfast and lunch previously considered (which is available retroactively).

Combined in Maryland, DHS reported that $214.9 million in benefits has been distributed to over 400,000 students. **Exhibit 10** provides information on the number of recipients and value of benefits distributed in each benefit cycle. The lower number of students receiving benefits in September 2020 largely reflects reductions for students who graduated in the 2019-2020 school year or were no longer attending an eligible school. Maryland was required to provide the September 2020 benefits by September 30, 2020 (the date the program authorization expired under FFCRA). As a result, no additional students that would have been newly eligible (such as those entering Kindergarten or newly enrolling in an eligible school) were able to be added to the program. These students are expected to be captured under the 2020-2021 school year program when approved in Maryland.

Exhibit 10
P-EBT Benefit Summary

	2019-2020 School Year	September 2020
SNAP	186,585	159,830
Non-SNAP	269,324	275,754
Total	**455,909**	**435,584**
Average per recipient	$367.12	
Benefits	**$167,372,754**	**$47,532,441**

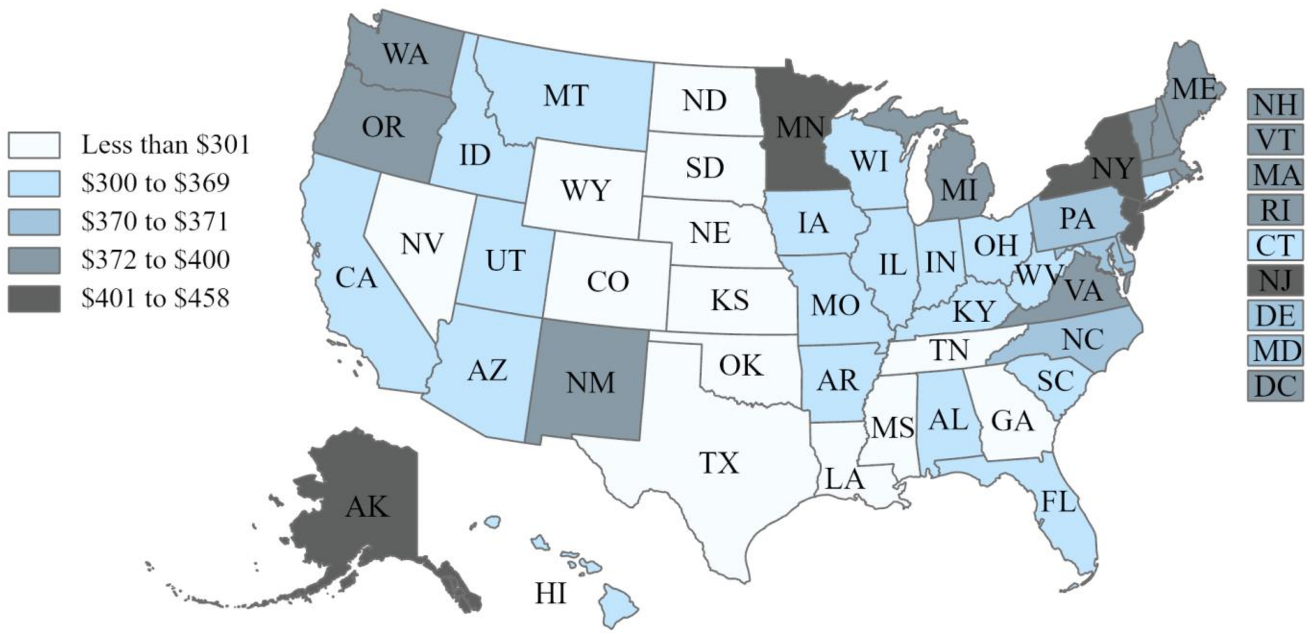
P-EBT: Pandemic Electronic Benefits Transfer
SNAP: Supplemental Nutrition Assistance Program

Note: DHS indicates that an additional 473 individuals received benefits in February 2021, related to corrections from earlier distributions, which are not shown in this chart.

Source: Department of Human Services; Department of Legislative Services

For the 2019-2020 school year, Maryland provided benefits for an average of 65 days of school closures (maximum benefit $370.50). As shown in **Exhibit 11**, this level was the sixteenth highest in the country and effectively the same level as provided in Delaware, Pennsylvania, and North Carolina. Due to the time that it took to develop the implementation procedures and determine eligible students, Maryland issued benefits for the 2019-2020 school year in a lump sum. According to Kone Consulting, 34 states distributed benefits in that manner under the initial program. Maryland distributed benefits in late June/early July 2020. In Maryland, for the September 2020 program, benefit amounts varied by school district based on the number of days that the school would have been open rather than being provided for a uniform number of days. On average, benefits were provided for 19 days but the actual days varied between 16 and 26.

Exhibit 11
P-EBT Maximum Benefits by State
2019-2020 School Year



P-EBT: Pandemic Electronic Benefits Transfer

Source: Kone Consulting *Pandemic EBT Implementation Documentation Project* September 2020; U.S. Census Bureau (shapefile); Department of Legislative Services

Exhibit 12 provides information on the number of recipients by jurisdiction in these initial distributions. In most jurisdictions, the majority of students receiving benefits were from non-SNAP households. The reduced price meals portion of the FRPM program has a higher eligibility than is available for SNAP for children (185% of the federal poverty level). In addition, benefits are provided to all children in Community Eligibility schools. These two factors are likely the cause of the higher share of non-SNAP recipients.

Exhibit 12
P-EBT Recipients by School District

	2019-2020 School Year			September 2020		
School District	**SNAP**	**Non-SNAP**	**Total**	**SNAP**	**Non-SNAP**	**Total**
Allegany	3,029	2,039	**5,068**	2,612	2,222	**4,834**
Anne Arundel	12,271	18,101	**30,372**	10,458	18,825	**29,283**
Baltimore	31,720	29,837	**61,557**	27,271	31,656	**58,927**
Calvert	2,047	1,599	**3,646**	1,782	1,681	**3,463**
Caroline	1,702	1,615	**3,317**	1,508	1,660	**3,168**
Carroll	2,220	3,161	**5,381**	1,875	3,268	**5,143**
Cecil	3,334	4,178	**7,512**	2,852	4,361	**7,213**
Charles	5,493	5,929	**11,422**	4,770	6,163	**10,933**
Dorchester	1,650	3,153	**4,803**	1,438	3,125	**4,563**
Frederick	4,601	7,837	**12,438**	3,977	7,904	**11,881**
Garrett	801	932	**1,733**	711	918	**1,629**
Harford	6,192	6,615	**12,807**	5,143	7,057	**12,200**
Howard	5,644	9,395	**15,039**	4,815	9,472	**14,287**
Kent	683	366	**1,049**	580	416	**996**
Montgomery	17,522	43,950	**61,472**	14,417	44,269	**58,686**
Prince George's	28,954	64,298	**93,252**	25,322	64,224	**89,546**
Queen Anne's	1,061	1,083	**2,144**	895	1,141	**2,036**
St. Mary's	3,392	2,835	**6,227**	3,001	3,047	**6,048**
Somerset	1,246	1,655	**2,901**	1,081	1,675	**2,756**
Talbot	1,112	1,143	**2,255**	995	1,155	**2,150**
Washington	5,988	6,240	**12,228**	5,201	6,485	**11,686**
Wicomico	4,727	5,333	**10,060**	3,952	5,704	**9,656**
Worcester	1,793	1,240	**3,033**	1,530	1,352	**2,882**
Baltimore City	39,403	44,882	**84,285**	33,167	47,401	**80,568**
SEED School	*0*	*364*	***364***	*0*	*341*	***341***
Non-public Private Schools	*0*	*1,544*	***1,544***	*477*	*232*	***709***
Total	**186,585**	**269,324**	**455,909**	**159,830**	**275,754**	**435,584**

P-EBT: Pandemic Electronic Benefits Transfer
SEED: School for Education Evolution and Development
SNAP: Supplemental Nutrition Assistance Program

Source: Department of Human Services

Benefits under the 2020-2021 School Year Program

The Continuing Appropriations Act, signed into law on October 1, 2020, authorized the program to continue for the 2020-2021 school year and expanded the program to include schools operating at reduced hours rather than only complete closures and to child care programs. In the program from the 2019-2020 school year, children at child care programs were not eligible. Under the expansion, the benefit is available for child care programs that are closed or operating at reduced hours. The Consolidated Appropriations Act subsequently amended the child care portion to make it easier to implement. Initial guidance on the extended school portion of the program was provided by USDA in November 2020, with updated guidance provided by USDA on January 29, 2021, including guidance on the revised child care portion of the program. As of February 12, 2021, 14 states and Puerto Rico have received approval for the extended program in the 2020-2021 school year. DHS indicates that it received initial feedback on its plan from USDA on February 4, 2021. DHS anticipates resubmitting the plan during the week of February 12, 2021. States are able to issue benefits retroactively for the eligible portion of the school year, regardless of when the state plan is approved.

Although the State has experience in providing benefits, delays in submitting a plan and providing benefits likely stem from changes in the program that lead to complications that did not exist in the prior program. However, recent guidance and changes in the authorizing legislation should ease some of this burden.

- ***Hybrid Schools/Mixed Status Learning:*** States are able to use simplifying assumptions related to school schedules when individual or school-level detail is not available or feasible, including using the most common or predominant school schedule to determine benefit amounts. States are encouraged to use the best feasible data and are required to reassess at least once every two months. States are also encouraged to allow children to self-identify for higher benefit amounts, if they remain fully virtual in a place where hybrid or in-person status is the default for that school/school system.

- ***Eligibility for School Program:*** States are authorized to use prior year eligibility for FRPM, recognizing that the local school systems may not have undertaken a FRPM application process for the current school year because of how school meals are being offered. However, in this situation, states must ensure that those no longer eligible due to changes in school status (graduation, home schooling, *etc.*) do not receive benefits, while newly eligible children (Kindergarten, transfers, change in income) have an opportunity to apply.

- ***Child Care Benefit:*** Initially, USDA did not provide guidance for how to implement the child care portion of the program due to implementation uncertainty. However, the Consolidated Appropriations Act amended the program, largely relieving the implementation issues that delayed the guidance. In particular, it provided eligibility for the benefit to (1) children in SNAP households at any time since October 1, 2020; and (2) deemed all children younger than the age of 6 to be enrolled in a covered child care facility. Under the USDA guidance, states can use school closures or reduced hours of schools in the area, rather than the specific child care location to determine eligibility.

When Maryland's program is approved, retroactive payments back to October 2020 will be provided for most children and to September 2020 for those determined eligible but not included in the earlier issuance. USDA is encouraging states to use multiple payments when providing the retroactive portion of the benefits to limit pressure on the supply chain and promote social distancing.

USDA indicated that states are also expected to communicate to households how the benefits can be declined, as the benefits cannot be gifted or donated. **DHS should provide an update on the status of the State plan, anticipated timeline for distribution of the school-based program and child care program, and communications that it plans to make related to how to decline the benefit.**

Summer SNAP for Children Act

Chapters 635 and 636 of 2019 created a process for the State to provide additional funding to supplement benefits received under SNAP for children in certain months. These funds were to be a match to local funds, with the local share determined by the local cost-share formula for the public school construction program. The supplemental benefit is $30 per month in the months of June, July, and August and $10 in the month of December per child in the household. The supplemental benefit is to be provided 15 days after the federally funded benefit under the traditional SNAP in the summer months and 7 days in December.

To participate in the program under Chapters 635 and 636, jurisdictions interested in participating must apply for the program and later submit a final plan that includes which children will be eligible to receive funding, if funding is insufficient to provide a minimum $100 benefit to all children in the jurisdiction receiving SNAP, and the criteria used to determine eligibility. DHS is to provide the State share of funds for each county with an approved final plan in an amount equal to the product of (1) the total amount of funds appropriated and (2) the number of children in households that receive a federal SNAP benefit in the county divided by the number of children in households that receive a federal SNAP benefit in all jurisdictions with an approved plan.

The chapters mandated $200,000 in State funding for the program. The fiscal 2021 budget provided this amount of funding. The *2020 Joint Chairmen's Report* requested DHS to submit two reports. The first report was to cover the summer benefits and the second report was to cover the December benefits. The report on December benefits will be submitted March 1, 2020, therefore no information is included about those benefits in this discussion.

DHS reports that 14 jurisdictions applied to participate in the program, though one jurisdiction later retracted the application. DHS selected four jurisdictions to participate in the program in fiscal 2021 (Baltimore City and Kent, Montgomery, and Prince George's counties). **Exhibit 13** provides information on the distribution of State funds and the total funding available by jurisdiction. Montgomery County contributed a substantially larger share of funding than required under the cost share formula. Total funds support both benefit costs and administrative expenses.

Exhibit 13
Summer SNAP Funding by Jurisdiction
Fiscal 2021

Jurisdiction	Required Local Contribution	State Funds	Local Funds	Total Funds
Baltimore City	4%	$100,000	$10,000	$110,000
Kent County	50%	8,500	8,500	17,000
Montgomery County	50%	46,410	181,890	228,300
Prince George's County	30%	46,667	20,000	66,667
Summary		**$201,577**	**$220,390**	**$421,967**

SNAP: Supplemental Nutrition Assistance Program

Source: Department of Human Services; Interagency Commission on School Construction; Department of Legislative Services

Although the benefits were meant to be provided in each of the separate months, the benefits were delayed in summer 2021 until September 4, 2021, due to the implementation of P-EBT benefits in the summer months. DHS indicates that the December 2020 benefits were made on time. Due to the limited amount of funding, not all eligible children in the selected jurisdictions could receive a benefit. As shown in **Exhibit 14**, Kent County served the highest share of eligible children among the four jurisdictions. However, it also has the fewest eligible children.

Exhibit 14
Eligible Children Participating in Summer SNAP by Jurisdiction
Fiscal 2021 Summer Benefits

Jurisdiction	Program Participants	Eligible Children	% of Eligible Served
Baltimore City	935	67,871	1.4%
Kent County	138	905	15.2%
Montgomery County	1,968	23,549	8.4%
Prince George's County	580	36,635	1.6%

SNAP: Supplemental Nutrition Assistance Program

Note: DHS will submit information on children that received the December 2020 benefit on March 1, 2021.

Source: Department of Human Services; Department of Legislative Services

Consistent with the mandated appropriation, the fiscal 2022 allowance provides $200,000 for the program. As shown in Exhibit 14, relatively few children can be served with this level of funding even with the local match. **DHS should discuss the first year of implementation of the program and efforts to expand the reach of the program in the second year given the limitations in State funding, including encouraging local jurisdictions to contribute higher than the minimum local share.**

Operating Budget Recommended Actions

1. Add the following language:

   <u>Provided that $950,000 in general funds for administrative expenses in the Department of Human Services shall be reduced. The reduction shall be allocated among the programs and objects within the department.</u>

   Explanation: Language in the fiscal 2020 Budget Bill restricted $950,000 of the general fund appropriation in the Department of Human Services Local Family Investment Program to be used for a grant to support the transition of community action agencies or other community organizations in the transition to a Two-Generation Model of Service Delivery. These funds were required to be reverted if not used for this purpose. The fiscal 2021 budget plan assumed these funds would be reverted and a deficiency appropriation for fiscal 2020 replaced the restricted funds to allow the grant to be provided. However, the restricted funds were not reverted as required at closeout. This reduction may be allocated among subprograms and comptroller subobjects.

2. Adopt the following narrative:

   Reason for Case Closures: During a temporary end to six month extensions of recertifications in calendar 2020, the number of Temporary Cash Assistance (TCA), Temporary Disability Assistance Program (TDAP), and Supplemental Nutrition Assistance Program (SNAP) case closures increased substantially. In addition, the primary cause of closures during this period was failure to reapply. The committees are interested in monitoring the impact of the end of waivers that once again allow for recertifications to be extended by six months. The committees request that the Department of Human Services (DHS) submit reports on the number of case closures by month and the reason for closure separately for TCA, TDAP, and SNAP. The first report should include data for the period of October 2020 through June 2021, and each subsequent report should provide data for the appropriate quarter (July through September 2021, October through December 2021, January through March 2022, and April and May 2022).

Information Request	Author	Due Date
TCA, TDAP, and SNAP case closures by month	DHS	July 20, 2021 October 20, 2021 January 20, 2022 April 20, 2022 June 20, 2022

3. Adopt the following narrative:

Children Served in the Summer Supplemental Nutrition Assistance Program: Chapters 635 and 636 of 2019 created a supplemental benefit for children receiving the Supplemental Nutrition Assistance Program (SNAP) in jurisdictions that chose to implement the program. Fiscal 2021 was the first year of mandated funds, and the summer benefits were delayed as the State implemented pandemic related programs. The fiscal 2022 allowance also includes the $200,000 mandated funding. The committees are interested in continuing to monitor the implementation of the program with a more typical benefit distribution. The committees request that the Department of Human Services (DHS) provide two reports with the following information:

- the number of children served by jurisdiction;
- the benefit level provided by jurisdiction; and
- the number of children in participating jurisdictions that are not able to receive benefits due to insufficient funding by jurisdiction.

In addition, the first report should also provide information on the number of jurisdictions that applied for the program funding; how the determination for funding was made by jurisdiction; the total funding available for benefit including the local match by jurisdiction; and how jurisdictions determined which children would receive the benefit.

The first report should cover the summer portion of the program (June, July, and August 2021), while the second report should cover the winter portion of the program (December 2021).

Information Request	**Author**	**Due Date**
Children receiving benefits through the Summer SNAP for Children Act	DHS	October 1, 2021 February 1, 2022

4. Adopt the following narrative:

Pandemic Electronic Benefits Transfer (P-EBT) Spending: The committees are interested in understanding the impact of the P-EBT program on the Supplemental Nutrition Assistance Program budget. The committees request that the Department of Human Services (DHS) and Department of Budget and Management (DBM) separately identify in subprogram detail spending related to the P-EBT program in the fiscal 2021 actual and, to the extent applicable, the fiscal 2022 working appropriation and fiscal 2023 allowance.

Information Request	Authors	Due Date
P-EBT costs	DHS DBM	With submission of the fiscal 2023 allowance

5. Adopt the following narrative:

Application Processing Times and Denial Rates: The committees are concerned about the ability to process applications and recertifications timely, given the anticipated surge in recertifications following the end of extensions of this requirement. In addition, the committees are concerned that the ability to provide verification documents will continue to be problematic with the limited access to local departments of social services. The committees request that the Department of Human Services (DHS) submit three reports that contain:

- the average number of days to process applications by benefit type for Temporary Cash Assistance (TCA), Supplemental Nutrition Assistance Program (SNAP), and Temporary Disability Assistance Program (TDAP) separately by month of application;
- the percent of applications processed in 0 to 30 days, 31 to 45 days, and longer than 45 days by benefit type for TCA, SNAP, and TDAP separately by month of application; and
- the number and percent of applications denied by reason for denial and by benefit type for TCA, SNAP, and TDAP.

The first report due on August 15, 2021, should cover the period of April 2021 through July 2021. The second report due on December 31, 2021, should cover the period August 2021 through November 2021. The third report due on June 30, 2022, should cover the period December 2021 through May 2022.

Information Request	Author	Due Date
Application processing times and denial rates	DHS	August 15, 2021 December 31, 2021 June 30, 2022

6. Adopt the following narrative:

Performance Data for the Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T) Program: The committees continue to be interested in the participation in and performance of the SNAP E&T program. The committees request that the Department of Human Services (DHS) begin including in its annual Managing for Results submission:

- performance in each of the national performance measures for SNAP E&T separately for the total population and the able-bodied adults without dependents (ABAWD) population;

- performance in the State option measures for SNAP E&T identified in the State plan for program components serving 100 or more individuals separately for the total population and the ABAWD population; and

- participation in SNAP E&T by participant characteristic as defined in the performance measures, including education, gender, age, and ABAWD status for federal fiscal 2020 and 2021.

Information Request	Author	Due Date
SNAP E&T participation and performance	DHS	With the submission of the fiscal 2023 budget and annually thereafter

Updates

1. SNAP ABAWD Waiver Final Rule Vacated

Historically, USDA granted both statewide and local/regional waivers of ABAWD time limited benefit requirements in times of or areas experiencing economic difficulties. Discretionary exemptions also allow states the flexibility to not require an ABAWD to meet the requirement for one month per exemption.

During the Great Recession and Recovery, waivers were heavily used by states. However, the waiver use began to change as the economy continued to improve. Maryland's statewide waiver ended following the first quarter of federal fiscal 2016, and it began to operate with waivers in some jurisdictions in the second quarter. In the second quarter of federal fiscal 2020, only 4 states and territories had a statewide waiver, while 30 states (including Maryland) had waivers in portions of the state. Maryland's waiver, at that time, covered 13 jurisdictions (Allegany, Caroline, Cecil, Dorchester, Garrett, Harford, Kent, Queen Anne's, Somerset, Talbot, Wicomico, and Worcester counties and Baltimore City). In both January and February 2020, the number of ABAWDs statewide (including jurisdictions with a waiver at that time) was approximately 44,400. As the caseload rose during the COVID-19 pandemic, the number of ABAWDs statewide increased; and in June 2020, DHS reported 101,279 ABAWDs statewide.

Final Rule on Waivers of ABAWD Time Limit and Exemptions

In December 2019, USDA finalized changes related to the ABAWD time-limited benefit requirement, primarily related to the rules under which waivers of the requirements can be requested and discretionary exemption carryover rules. Under this final rule at the time it was adopted, no jurisdiction in Maryland would have qualified for a waiver.

Final Rule Vacated

On January 16, 2020, the Attorney General of Maryland along with 13 states; Washington, DC; and New York City filed a lawsuit in the U.S. District Court for the District of Columbia related to the final rule. The Attorney Generals filed a motion for preliminary injunction to prevent the rule from going into effect on April 1, 2020. The lawsuit was consolidated with a related lawsuit. On March 13, 2020, a preliminary injunction and stay of implementation was granted for the waiver-related changes, which had been scheduled to go into effect on April 1, 2020. A preliminary injunction was not granted related to the discretionary exemptions; however, that change was not scheduled to be effective until October 1, 2020.

On October 18, 2020, Chief Judge Beryl A. Howell issued an order vacating the Final Rule in its entirety, including the discretionary exemption carryover change not included in the preliminary injunction and stay.

2. Five Year Time Limit on TCA Receipt

Federal law prohibits cases headed by an adult from receiving TANF-funded cash benefits for more than five cumulative years. However, federal law also provides for exemptions to the time limit for hardship. Under this provision, 20% of the caseload receiving TANF-funded cash assistance from the previous fiscal year may continue to receive these benefits beyond five years. Because the law only applies to federally funded cases, State-only cases are excluded from the calculation. In federal fiscal 2020, the annual average number of cases headed by adults that received assistance for more than 50 months that were subject to the time limit was 2,084 (10.3%) of those subject to the limit (20,283). That level is below the 20% exemption limit for federal fiscal 2020, and none of these cases were closed from TCA due to the time limit.

In October 2020, The University of Maryland School of Social Work Family Welfare Research and Training Group released a brief on TCA recipients that exceed the 60-month time limit (*Long-Term Welfare Receipt: Who are the 5% and Why do they Stay?*). The brief focused on recipients who were new to the program between fiscal 2011 and 2014. The report found that recipients who exceeded the time limit are more likely to have disability-related barriers, particularly long-term disabilities or being a caretaker of a disabled relative. Consistent with this finding, a higher share of these recipients (46.5% vs. 34.0%) were placed in a work-exempt designation at entry into TCA. In addition, an older age at entry and higher average unemployment rate in the first year of receipt were found to increase the likelihood of exceeding the time limit. Employment in the first year of receipt had the largest impact on decreasing the likelihood of exceeding TCA receipt.

Recent Action

A fiscal compliance audit released by the Office of Legislative Audits (OLA) in March 2019 included a finding that FIA allowed recipients to continue to receive benefits beyond the five-year time limit. In particular, OLA noted that the benefits were automatically extended without a review of whether there were justified hardships. Although the department disagreed with an assumption that all benefits provided beyond five years were provided improperly, the department indicated that it agreed with the recommendations. DHS planned several actions to address the recommendations including (1) enhancing its case monitoring to include whether benefits should be terminated and compliance with regulations; (2) mandating biannual training that will include regulations related to receipt of TCA for longer than 60 months; and (3) ensuring that the new benefit system under development requires documentation of the reason for a hardship exemption. In addition, during fiscal 2020, DHS issued a policy document to staff describing the actions that must be taken to grant a hardship exemption, actions following the determination of a hardship exemption, and discuss actions that should be taken prior to a household reaching the 60-month limit.

Appendix 1
2020 *Joint Chairmen's Report* Responses from Agency

The 2020 *Joint Chairmen's Report* (JCR) requested that the Department of Human Services (DHS) Family Investment Administration (FIA) prepare five reports. Electronic copies of the full JCR responses can be found on the Department of Legislative Services Library website.

- ***Children Receiving Benefits through the Summer Supplemental Nutrition Assistance Program (SNAP) for Children Act:*** Further discussion of this report can be found in Issue 2 of this analysis.

- ***Status of Correction Actions Related to the Most Recent Fiscal Compliance Audit:*** The fiscal compliance audit for FIA dated March 2019 included eight findings, of which four were repeated from the prior audit. As a result, funds were restricted until the Office of Legislative Audits submits a report listing each repeat audit finding along with a determination that each repeat finding was corrected. As of this writing, this report has not yet been submitted.

- ***Impact of Final and Proposed Rule Changes Related to SNAP:*** DHS reports that the number of able-bodied adults without dependents (ABAWD) statewide increased from approximately 44,400 in January and February 2020, prior to the COVID-19 pandemic impacts, to 101,279 in June 2020. However, no ABAWDs were impacted by a final rule that would have made ABAWDs in 13 jurisdictions subject to the time limited benefits after loss of the waiver due to the rule because of court orders on the rule and federal stimulus legislation suspending the requirements for all ABAWDs. Subsequently, the State received a statewide waiver of these rules through June 30, 2021. Two other proposed rules have not been finalized and therefore have no impact at this time.

- ***Performance Data for the SNAP Employment and Training Program:*** DHS stated that it estimates that $14.8 million was spent for the SNAP Employment and Training (E&T) program in federal fiscal 2020, with $20.9 million expected in federal fiscal 2020. The vast majority of these funds are provided to third party partners that provide job readiness, skills training, case management, job retention, and other services. DHS reported 21 third party partners received these funds in federal fiscal 2021. In the second quarter after program completion, for federal fiscal 2018 participants, 60% of participants were in unsubsidized employment (56% of ABAWD participants). These figures were higher for federal fiscal 2019 participants (63% for all and 62% for ABAWD participants). In the fourth quarter after program completion for federal fiscal 2018 participants, 57% of were in unsubsidized employment (59% of ABAWD participants).

- ***Employment and Training Program Outcomes:*** As described, the employment and training programs funded through the Temporary Assistance for Needy Families, SNAP, and Workforce Innovation and Opportunity Act (WIOA) programs are generally similar, though SNAP E&T funds cannot be used for current Temporary Cash Assistance (TCA) recipients. However, former TCA recipients can transition to that program. Outcome data is tracked through a variety of systems but varies by type of program. SNAP E&T and WIOA programs track employment and earnings in the second and fourth quarter after completion. None of the programs track earnings or employment beyond the fourth quarter after the program completion. However, outcome measures for other programs do not focus on these types of measures (job retention is tracked for TCA recipients, but for a shorter period, and average hourly wages and hours worked for the Non-Custodial Parent Employment Program).

Appendix 2
Object/Fund Difference Report
Department of Human Services – Family Investment

Object/Fund	FY 20 Actual	FY 21 Working Appropriation	FY 22 Allowance	FY 21 - FY 22 Amount Change	Percent Change
Positions					
01 Regular	1,992.30	1,993.30	1,933.30	-60.00	- 3.0%
02 Contractual	139.89	70.00	70.00	0.00	0%
Total Positions	**2,132.19**	**2,063.30**	**2,003.30**	**-60.00**	**- 2.9%**
Objects					
01 Salaries and Wages	$ 145,801,817	$ 141,003,565	$ 136,066,753	- $ 4,936,812	- 3.5%
02 Technical and Spec. Fees	3,791,815	2,906,283	2,959,989	53,706	1.8%
03 Communication	879,483	768,877	759,235	- 9,642	- 1.3%
04 Travel	259,915	195,346	182,945	- 12,401	- 6.3%
06 Fuel and Utilities	1,032,101	1,250,084	1,100,439	- 149,645	- 12.0%
07 Motor Vehicles	11,173	6,777	6,777	0	0%
08 Contractual Services	52,829,825	55,289,780	52,204,028	- 3,085,752	- 5.6%
09 Supplies and Materials	1,000,240	1,216,465	1,025,805	- 190,660	- 15.7%
10 Equipment – Replacement	34,001	22,721	22,721	0	0%
11 Equipment – Additional	96,340	35,197	35,197	0	0%
12 Grants, Subsidies, and Contributions	1,434,202,346	1,097,375,860	1,480,696,971	383,321,111	34.9%
13 Fixed Charges	15,606,587	15,326,917	13,129,078	- 2,197,839	- 14.3%
Total Objects	**$ 1,655,545,643**	**$ 1,315,397,872**	**$ 1,688,189,938**	**$ 372,792,066**	**28.3%**
Funds					
01 General Fund	$ 118,124,954	$ 133,805,662	$ 169,053,716	$ 35,248,054	26.3%
03 Special Fund	21,131,666	9,345,561	17,516,340	8,170,779	87.4%
05 Federal Fund	1,514,944,007	1,172,246,649	1,501,619,882	329,373,233	28.1%
09 Reimbursable Fund	1,345,016	0	0	0	0.0%
Total Funds	**$ 1,655,545,643**	**$ 1,315,397,872**	**$ 1,688,189,938**	**$ 372,792,066**	**28.3%**

Note: The fiscal 2021 appropriation does not include deficiency appropriations, supplemental deficiency appropriations, or general salary increases. The fiscal 2022 allowance does not include annual salary review adjustments or the annualization of general salary increases.

Appendix 3
Fiscal Summary
Department of Human Services – Family Investment

Program/Unit	FY 20 Actual	FY 21 Wrk Approp	FY 22 Allowance	Change	FY 21 - FY 22 % Change
02 Local Family Investment Program	$ 156,260,555	$ 164,005,424	$ 156,939,450	- $ 7,065,974	- 4.3%
08 Assistance Payments	1,394,050,778	1,048,505,513	1,429,698,099	381,192,586	36.4%
10 Work Opportunities	28,699,583	31,330,013	28,781,050	- 2,548,963	- 8.1%
04 Director's Office	44,425,501	41,832,859	43,044,873	1,212,014	2.9%
05 Maryland Office for Refugees	10,031,231	14,672,828	14,675,231	2,403	0%
07 Office of Grants Management	22,077,995	15,051,235	15,051,235	0	0%
Total Expenditures	**$ 1,655,545,643**	**$ 1,315,397,872**	**$ 1,688,189,938**	**$ 372,792,066**	**28.3%**
General Fund	$ 118,124,954	$ 133,805,662	$ 169,053,716	$ 35,248,054	26.3%
Special Fund	21,131,666	9,345,561	17,516,340	8,170,779	87.4%
Federal Fund	1,514,944,007	1,172,246,649	1,501,619,882	329,373,233	28.1%
Total Appropriations	**$ 1,654,200,627**	**$ 1,315,397,872**	**$ 1,688,189,938**	**$ 372,792,066**	**28.3%**
Reimbursable Fund	$ 1,345,016	$ 0	$ 0	$ 0	0.0%
Total Funds	**$ 1,655,545,643**	**$ 1,315,397,872**	**$ 1,688,189,938**	**$ 372,792,066**	**28.3%**

Note: The fiscal 2021 appropriation does not include deficiency appropriations, supplemental deficiency appropriations, or general salary increases. The fiscal 2022 allowance does not include annual salary review adjustments or the annualization of general salary increases.