



KANSAS LEGISLATIVE
DIVISION *of*
POST AUDIT

A Performance Audit Report Presented to the Legislative Post Audit Committee

Reviewing Temporary Assistance for Needy Families' Eligibility Process and Spending, Part 2

May 2026

Report Number: R-26-010

Introduction

The Legislative Post Audit Committee requested this audit, which was authorized at its May 12, 2025 meeting.

Objectives, Scope, & Methodology

Our audit objective was to answer the following question:

1. To what degree has DCF made improper TANF benefit payments?

The original audit proposal included 3 other questions related to the Temporary Assistance for Needy Families (TANF) program. We split the audit into 2 reports and released the report related to those 3 questions in April 2026.

The scope of our work for this audit included interviewing Department for Children and Families (DCF) officials and reviewing documents related to the department's TANF performance evaluation system for fiscal year 2025. We analyzed a limited amount of data from that system. We also reviewed federal and state law to determine what rules DCF must follow for reviewing TANF payments.

More specific details about the scope of our work and the methods we used are included throughout the report as appropriate.

Important Disclosures

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. In this audit, the data the department provided to us was not sufficient or reliable to answer the audit question. Additionally, federal law prohibits us from reviewing the application data we needed to conduct additional test work. As a result, we were unable to answer the audit objective.

Our audit reports and podcasts are available on our website www.kslpa.gov.

Data limitations and federal laws prevented us from evaluating the accuracy of TANF benefit payments.

The federal government does not require states to assess the accuracy of their TANF benefit payments.

- Although the federal government requires states to determine and report their accuracy for Supplemental Nutrition Assistance Program (SNAP) benefit payments, they do not require this for the TANF program.
- However, we looked for national studies or reports from other states to gain an understanding of the magnitude of improper TANF benefit payments. A study of 8 states released in 2009 by the Department of Health and Human Services estimated the national improper payment rate for TANF could be as high as 9.3%. However, we could not find any more recent work on this issue.
- In 2025, the Government Accountability Office reported that the lack of national improper payment analysis can be traced to statutory limitations. They emphasized a need for statutory changes that would give the U.S. Department of Health and Human Services adequate authority to request data from states to calculate improper TANF benefit payments.

DCF has an employee performance review process that includes reviewing TANF payments for process and accuracy errors.

- DCF has a process to review a selection of TANF payments for procedural and benefit payment accuracy. DCF officials told us they have had this process in place for multiple decades, but it was suspended during COVID. Over the last few years, DCF officials have started to re-implement it. Starting this year, it is now routinely required again.
- DCF does not have a formal written process supervisors must follow to conduct these reviews. However, they told us supervisors or other staff review TANF cases to make sure staff members followed proper procedures. For example, they review whether staff determined eligibility within the required 45 days, whether staff determined the applicant had not already received TANF for 24 months, and whether staff verified citizenship. In some cases, supervisors only review procedural criteria. However, in others, they will also determine if staff made the correct benefit payment amount.
- DCF does not require a specific number of cases to be reviewed, but supervisors must review certain cases. Supervisors are required to review all cases completed by new staff members. They must also review cases processed by staff who have had performance issues in the past.
- DCF officials told us they use the results of these reviews for a few purposes. The reviews help provide feedback to individual staff. They also use them to

determine what types of training to provide and how to provide better instruction in operational manuals. However, they do not report the results to any state or federal agency.

- In fiscal year 2025, DCF reviewed nearly 9,000 criteria across about 1,300 cases. DCF determined that 92% of those criteria were completed or determined correctly.

However, the data DCF provided to us from that process is not sufficient or reliable for determining the department's accuracy in making TANF benefit payments.

- DCF provided data to us from the cases they reviewed in fiscal year 2025. This included aggregated results from the review and limited information on the individual cases they reviewed.
- However, we could not adequately determine how accurate DCF's TANF payments were using that data for the following reasons:
 - The cases DCF supervisors reviewed were not chosen randomly and are not a representative sample of the whole population. Supervisors largely review cases completed by new staff. These staff are more likely to make errors and so their results are unlikely to be representative of all cases.
 - For the year we reviewed, DCF did not require all supervisors to conduct these reviews (the reviews are required starting this year). This inconsistency also means the cases that were reviewed are unlikely to be representative of all cases.
 - In many cases that were reviewed, the supervisor checked only the process and not the accuracy of the payment. It is possible for staff to make a process mistake that would not affect the accuracy of the payment. For example, staff could accurately determine the payment amount even if they failed to make the eligibility determination in 45 days.
- The system DCF uses to review TANF payments is informal and primarily meant to evaluate staff performance. Federal law does not require that DCF take any steps to review TANF payments. Subsequently, DCF's system does not adequately assess whether staff are accurately determining TANF payments.

Federal law prohibits us from looking at the application data that would allow us to assess the accuracy of TANF benefit payments.

- We attempted to review applications to determine for ourselves whether DCF's TANF benefit payments were accurate.

- However, federal code 7 CFR 272.1(c) prohibits DCF from sharing certain personal information from the application to state auditors. This statute pertains to information provided on the SNAP application. However, the application for TANF and SNAP is the same and the information overlaps significantly. As a result, this code also applies to the TANF financial data we needed to answer the audit question. Per federal code, DCF can provide detailed recipient and financial data only to specific agencies, including:
 - employees of the U.S. Comptroller General's Office
 - agencies directly connected with the administration or enforcement of SNAP
 - agencies directly connected with the administration of the Child Support Program and the National School Lunch Program
 - law enforcement for the purpose of investigating an alleged violation
 - Office of the Revisor of Statutes staff told us it would be difficult to argue that LPA meets any of those definitions. As a result, we did not have access to the detailed applicant financial information we needed to determine whether DCF determined TANF benefit payments accurately.
-

Conclusion

None.

Recommendations

We did not make any recommendations for this audit.

Agency Response

On April 29, 2026 we provided the draft audit report to the Department for Children and Families. Its response is below. In its response, officials disagreed with our findings that the data from the performance review system was not sufficient or reliable for answering the audit objective. We carefully reviewed the department's response but did not change our findings or conclusions for the following reasons:

- **The agency disagrees with our determination that the data they provided to us is not sufficient or reliable for determining the department's payment accuracy.** Although the data from the department's performance system may provide them with enough information to monitor the TANF application process, it does not provide enough information for us to answer the audit objective. For the reasons listed on page 4 of this report, we

determined that the data did not allow us to reliably and accurately calculate a TANF payment error rate.

- **The agency contends there is no evidence in the audit to support the assertion that the program has made excessive inaccurate payments.** This report does not assert that the program has made excessive inaccurate payments. We did not have the data necessary to evaluate the department's TANF payment accuracy. As a result, we did not draw any conclusions regarding DCF's TANF payment accuracy.

DCF Response

Thank you for the opportunity to provide a response to the Performance Audit Report: Reviewing Temporary Assistance for Needy Families' Eligibility Process and Spending, Part 2 (May 2026). The Kansas Department for Children and Families (DCF) respectfully submits the following responses for the audit which looked to find 'to what degree has DCF made improper TANF benefit payments?'

DCF would like to address that the report, while having no findings or recommendations, does include the statement that ***"the data DCF provided to us from that process is not sufficient or reliable for determining the department's accuracy in making TANF benefit payments."*** The agency wholeheartedly disagrees with this statement. We are confident that TANF eligibility and payment decisions are accurate, and appropriate processes are in place to ensure the integrity of these decisions and the program as a whole. While the agency appreciates the work done by the Legislative Post Audit team, there is no evidence in the audit to support the assertion that the program has made excessive inaccurate payments. The TANF program and work by Kansas staff has been reviewed 5 times via both LPA and federally required single state audits over the past 4 years.

Outside of the interview and collateral client contact to verify information, regional staff who review cases follow established statewide eligibility determination processes. DCF utilizes this process for TANF case reviews in the Case Action Review system (CARE) as the official platform for maintaining TANF case review data.

TANF case reviews are completed on a regular basis by Regional EES Quality Assurance (Performance Improvement and Supervisors). These case reviews are entered into the agency's CARE system to facilitate tracking, trend analysis, and the identification of causal factors, thereby guaranteeing data accuracy and consistency. The CARE system generates reports detailing the number of cases reviewed, the identified causes and trends of errors, and overall payment accuracy. Eligibility staff use these reports to examine specific cases, leading to better assessments and ensuring eligibility decisions are accurately made.

CARE data is monitored by the Program Integrity Unit and regional staff, sharing trends with Program Specialists for further review. The data from the Supervisory Case Reviews are monitored by regional management.

Kansas continually assesses the review elements and causal factors embedded in the CARE system. In response to those assessments, Kansas is upgrading the CARE

system to ensure continued compliance with federal and state requirements. While the ongoing upgrades, once implemented will allow statewide staff to drill down into federal targets and provide a more accurate assessment of potential areas of concern, the current system and practices maintain sufficient qualitative data for case review in the meantime.

Conclusion

We thank the Legislative Post Audit team for the opportunity to discuss TANF Eligibility and Spending. As found during the audit process, the TANF program has complex rules, and Kansas DCF is committed to ensuring eligibility determination and issuance of benefits continue to be done in an accurate and efficient manner. As an agency we leverage the tools available to make sure staff are thoroughly trained and are committed to the integrity of the program. Thank you for the opportunity to provide clarification and response.

Sincerely,

Laura Howard, Secretary

Appendix A – Cited References

This appendix lists the publication we relied on for this report.

1. Temporary Assistance for Needy Families: Actions Needed to Improve HHS Oversight (April, 2025). *United States Government Accountability Office*.