August 2, 2011

George Sheldon
Acting Assistant Secretary
Administration for Children and Families
U.S. Department of Health and Human Services
370 L’Enfant Promenade, S.W.
Washington, D.C. 20447

Dear Mr. Sheldon:

I am writing in reference to the Presidential Memorandum on Administrative Flexibility which encourages, in part, the creation of opportunities to improve outcomes in public assistance programs through the judicious use of waivers.

Nevada is very interested in working with your staff to explore program waivers that have the potential to encourage more cooperative relationships among the state agencies engaged in economic stimulus through job creation, employment skill attainment and gainful employment activities. Nevada is also interested in exploring performance measures that ensure program accountability and also increase the probability of families becoming self-sufficient by providing meaningful data as to the services or combination of services with the best outcomes.

Governor Sandoval has been very supportive of the concept of collaborative efforts among Nevada’s state agencies and recently included funding for an employer incentive program targeted to create jobs for TANF recipients in his proposed executive budget. While the concept was positively received by the state’s legislators, it was not funded in order to minimize the impact of substantial budget cuts to other social service programs. A copy of the budget presentation is attached for your review.

The following are some examples of concepts staff would be interested in exploring to illustrate some of the potential in administrative flexibility.

**WIA – TANF Coordination** – The current WIA/TANF environment often leaves TANF recipients eligible but unserved by WIA funded programs. Suggestions include:
- Providing a direct allocation of WIA funds to serve TANF families;
- Restoring and increasing the percentage of WIA funds in the Governor’s Reserve, which could in turn be utilized to provide statewide services targeted to TANF recipients; and
- Establishing separate WIA outcome measures for TANF recipients to encourage, rather than discourage, serving this population.

**TANF Performance Measures and Possible Waiver Opportunities**

- As an alternative to setting work requirements based on a one-parent or two parent case types, consider utilizing a system that sets work requirements based on a family’s assessed employment barriers;
- Exempt the hardest-to-employ population for a period of time (i.e. six months) to allow time for their barriers to be addressed and their household circumstances stabilized;
- Index TANF performance measures to the state’s unemployment rate.
- Consider measuring outcomes to signify a family’s progression toward self-sufficiency. Job readiness status is a continuum from those with the most barriers, least employable skills and least connection to the work force to those who have employable skills, are highly motivated and only recently became unemployed. Individuals will present at different points of that continuum, and measuring their progression toward self-sufficiency is meaningful. Such measures would take into account those individual with the most significant barriers will need more time and assistance to become self-sufficient, while ensuring satisfactory progression towards that goal.

Please reference the Division’s attachment which illustrates Nevada’s tiered concept based on an individual’s assessed job readiness status.

I would like to thank you for considering advancing discussions on these and other ideas which could advance the collaboration of state agencies and improve services and employment outcomes for families.

Sincerely,

Michael J. Willden  
Director

cc: Romaine Gilliland, Administrator, Nevada Division of Welfare and Supportive Services