

SESSION 2

# Structuring Provider Contracts for Outcomes & Accountability

*TANF Program Integrity Office Hours*

How States Can Write Contracts That Drive Accountability  
and Improve Participant Outcomes

June 18, 2026

*As you join, please share in the chat:*  
**Your name, state, and title**



# WELCOME



**Janelle Jones**

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Project STAR  
Mathematica



# Why Program Integrity? Why Now?

TANF serves some of America's most vulnerable families. Ensuring those dollars reach their intended purpose — and that TANF agencies can demonstrate that they do — is a shared federal and state responsibility.

01

## THE STAKES ARE HIGH

States and Tribes oversee a \$16.5 billion annual TANF block grant—plus roughly \$15 billion in state maintenance-of-effort funds.

About half goes to non-assistance services, much of it delivered through contractors.

02

## FEDERAL SCRUTINY IS INTENSIFYING

Three 2025 GAO reports directly address TANF program integrity gaps — covering information sharing (GAO-25-107226), HHS spending oversight (GAO-25-107235), and fraud risk management (GAO-25-107290).

03

## THIS SERIES IS A RESPONSE

The Program Integrity Office Hours series was developed in direct response to GAO recommendations to help states and Tribes strengthen their program integrity practices.

# WHAT THE GAO FOUND — AND WHAT IT MEANS FOR YOUR AGENCY

## ENHANCED REPORTING COULD IMPROVE HHS OVERSIGHT OF STATE SPENDING

**Key finding:** Federal oversight of TANF spending — particularly non-assistance — is hampered by inconsistent reporting and limited visibility into how funds are used at the subrecipient level.

GAO-25-107235

## ADDITIONAL ACTIONS NEEDED TO STRENGTHEN FRAUD RISK MANAGEMENT

**Key finding:** HHS identified 21 TANF fraud risks — many specific to contractors and subrecipients (e.g., inflated invoices, unqualified contractors, opaque accounting). Limited federal data on subrecipient activities is a recurring concern.

GAO-25-107290

## HHS COULD FACILITATE INFORMATION SHARING TO IMPROVE STATES' USE OF DATA ON JOB TRAINING AND OTHER SERVICES

**Key finding:** Many states lack mechanisms to systematically share data across the agencies and providers that deliver TANF-funded services. Process measures make it hard to connect spending with outcomes.

GAO-25-107226

## WHAT THESE FINDINGS MEAN FOR YOUR AGENCY:

States and Tribes that build accountability into the contracts themselves — through outcome-based measures, enforceable reporting requirements, and structured review cycles — are better positioned to close fraud risk and spending oversight gaps.



# THE CONTRACTOR ACCOUNTABILITY GAP

Most TANF non-assistance services are delivered through contractors — but agencies rarely receive data that tells them whether services are working.

- **Contractors track what's required.**  
Reporting requirements typically reflect federal compliance — not state accountability.
- **What's required ≠ what matters.**  
Output counts answer "did it happen?" — not "did it work for families?"

## Where Accountability Breaks Down

**Agency sets contract terms**

**Contract drives data collection**

**Provider reports what's required**

*Agencies can't tell if services are working for families*



# WHAT STRONG PROVIDER CONTRACTS LOOK LIKE

## 01 Outcome-Based Measures

Tie performance to what families actually experience and gain — not just what was delivered.



## 02 Enforceable Reporting Requirements

Build reporting requirements directly into contract language.



## 03 Annual Review Cycles

Use renewal cycles as a built-in accountability and learning loop.



## 04 Build on Existing Data

When you can, leverage existing administrative data — don't add reporting burden on participants and staff.



# POLICY GROUNDING & PRACTITIONER TOOLS

*Each practice connects to federal policy requirements and is supported by practitioner tools — the companion product goes deeper on each.*

01

## Outcome-Based Measures

- Fiscal Responsibility Act of 2023 — work outcomes reporting requirements (employment 2 quarters post-exit)
- Aspen Institute Measuring Mobility Toolkit — practitioner guide to selecting and tracking family outcome measures ([ascend.aspeninstitute.org](https://ascend.aspeninstitute.org))

02

## Enforceable Reporting Requirements

- OMB Uniform Guidance — 2 C.F.R. Part 200 (subrecipient monitoring requirements)
- ACF-OFA-IM-25-01 — OFA guidance to enhance subrecipient monitoring

03

## Annual Review Cycles

- Single Audit Act — annual review of internal controls (2 C.F.R. § 200.501)
- Leveraging Procurements and Contracts to Align on Outcomes (LASER TANF learning community, [peerta.acf.hhs.gov](https://peerta.acf.hhs.gov))

04

## Build on Existing Data

- GAO-25-107235 — admin data integration for spending visibility
- Urban Institute — Improving State TANF Performance Measures ([urban.org](https://urban.org))

# THE SHIFT IN MINDSET

## FROM

What's easy to count

Reporting as paperwork

One-time contract review

Building new data systems



## TO

**What matters for families**

**Reporting as accountability**

**Annual learning cycle**

**New uses for existing data**



# State in Focus: Wisconsin

*Restructuring contracts to support families — not just compliance.*

**Patara Horn**, *Director, Bureau of Working Families*

**Maggie Renno**, *Director, Analytics and Research*

**Wisconsin Department of Children and Families, Division of Economic Security**

# SETTING THE STAGE: WHY THE TIMING WAS RIGHT

*A 14-year-old contract structure, and the room to do something different with it.*

## THE OLD CONTRACT

*Built to recover from a WPR penalty.*

- 14 years old, 8 contracted agencies, 10 service delivery regions
- Performance metrics tied to compliance and administratively burdensome
- Easy for contractors to choose quantity over quality
- Difficult to measure program effectiveness

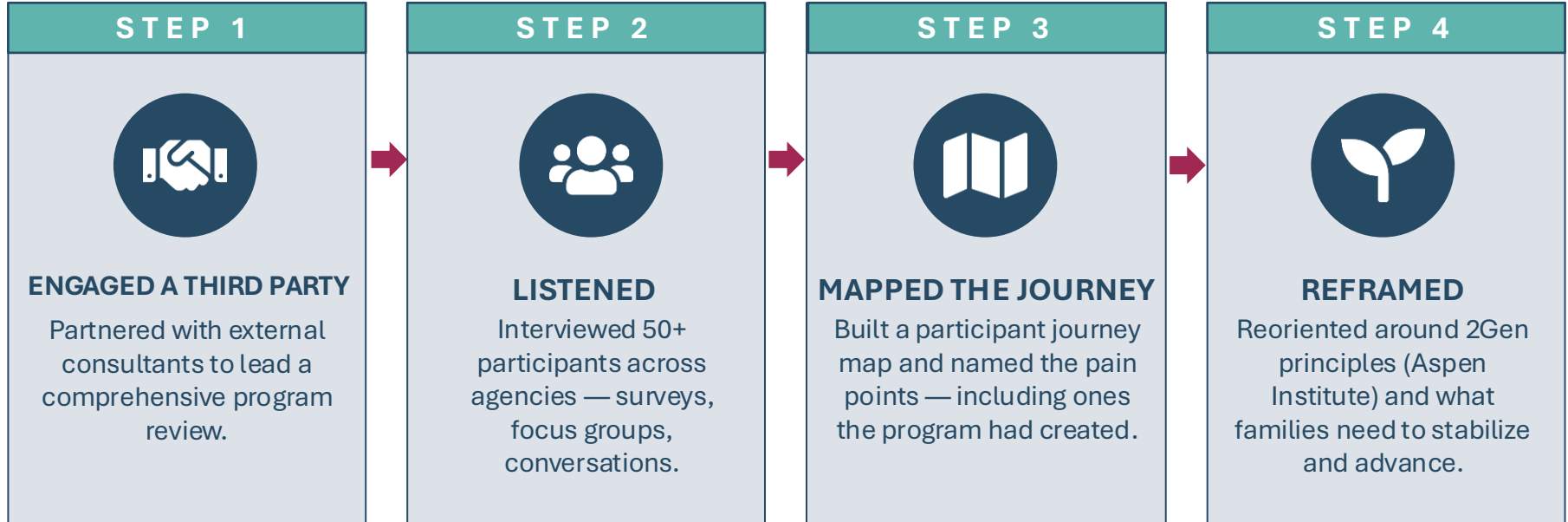
## THE NEW VISION

*Compliance is no longer the constraint.*

- Now meeting WPR — finally room to refocus
- New program leadership ready to question status quo
- Contract cycle ending — natural redesign moment
- Shift in focus: job quality, not just job placement
- Sustainable economic outcomes require other high quality services beyond job placement

# THE REDESIGN PROCESS

*Bringing in a third party to find the wiggle room, without rebuilding the whole program.*



**Result:** A redesign rooted in evidence — not a redesign for its own sake.

# WHAT WE BUILT: NEW METRICS, EXISTING DATA

*Built on the Aspen Institute's economic mobility pillars — and Wisconsin's existing data infrastructure*



## JOB ATTAINMENT & RETENTION

*Required by statute — measured differently.*

- Tiered by participant earnings
- Verified with paystubs



## WHOLE FAMILY METRICS

*New metrics across all economic mobility pillars.*

### **Economic assets**

- Family stabilization payment reach
- Family stabilization payment avg. amount

### **Social capital**

- Participant contact
- Customer satisfaction

### **Education & postsecondary pathways**

- Educational attainment
- Training completion

### **Health & well-being**

- Health & well-being activity assignment



## BUILT ON EXISTING DATA

*No new burden on participants or staff*

- Uses what agencies already collect
- Reporting designed to scale up over time

**THE SHIFT:** from "job placement" to ***tiered earnings, retention, and stabilization*** — measured with data providers already collect

# IMPLEMENTATION REALITY: WHERE WISCONSIN IS NOW



## WHAT MAKES THIS DIFFERENT

- A 2gen-centered contract with built-in accountability and learning loops; first of its kind in Wisconsin Works history
- Built on existing data infrastructure — no new data burden on participants or providers
- The contract renewal cycle itself became the lever for change

# TWO THREADS OF ACCOUNTABILITY

*Compliance management keeps the contract honest. Performance management keeps it useful.*



## COMPLIANCE MANAGEMENT Annual WAPA Review

*Five domains reviewed each year:*

- Fiscal responsibility
- Contract compliance
- Case management
- Program integrity
- Security



## PERFORMANCE MANAGEMENT Bi-Annual Family Stat

*A forum — not just a report-out:*

- State and agency leadership in the room
- Engages with metrics directly
- Celebrates successes, surfaces struggles
- Co-creates solutions with contractors

### IMPLEMENTATION

- 2-year base
- + two, 2-year renewal options
- 4 providers, 10 regions
- **Launch:** January 2027

# DISCUSSION



What's the biggest pain point in your contractor accountability today?



Where is current reporting diverging from what you actually need to know?



What would shift if your contracts measured outcomes instead of outputs?



What's getting in the way of building this kind of infrastructure in your state?



# THANK YOU!

## Resources & Next Steps

Companion product and session recording will be posted to the STAR website.

Peer consultation: STAR can support 1:1 follow-up for states working on contractor accountability.

**Next session — Thursday, July 16 2:00 PM EST**

**Comprehensive TANF Spending Oversight:**

*How States Can Build Risk-Based Monitoring Systems to Standardize and Strengthen Sub-Recipient Monitoring*

## Contact & Resources

**Email:** [STARinfo@blhtech.com](mailto:STARinfo@blhtech.com)

**STAR Website:** [peerta.acf.hhs.gov](http://peerta.acf.hhs.gov)

**Program Integrity Office Hours Webpage:**

[peerta.acf.hhs.gov/program-integrity-office-hours](http://peerta.acf.hhs.gov/program-integrity-office-hours)



# Program Integrity Office Hours – Session 2 Recap and Takeaways

*Structuring Provider Contracts for Outcomes and Accountability*



# RESTRUCTURING CONTRACTS TO SUPPORT FAMILIES — NOT JUST COMPLIANCE



**2011-2023**

## STARTING REFERENCE POINT

- Built to recover from WPR penalty
- Performance metrics tied to compliance and administratively burdensome
- Easy for contractors to choose quantity over quality
- Difficult to measure program effectiveness

**Unintentionally signaled that compliance metrics outweighed service experience**



**2023**

## THE VISION & DESIGNING

- Contract cycle ending, room to redesign
- Engaged a third party with external consultants
- Listening sessions with stakeholders
- Participant experience mapping
- “Whole family” approach to define program priorities
- Rethinking performance measurements
- Dual accountability structure

**A compliance-driven model to a participant-centered and performance-informed system**

# KEY DISCUSSION THEMES AND LESSONS LEARNED

Your peers are talking about the challenge and opportunity of evolving long-standing contracts and accountability systems



*Wisconsin connected back to their work...*



**2024-2027**

## IMPLEMENTATION PHASE

- RFPs developed and issued
- New contracts launch January 1, 2027, with redesigned performance metrics, reporting requirements, and accountability structure
- Implementation will continue to emphasize collaboration with providers

**Introduces incentives tied to sustained performance**

# WHAT'S COMING NEXT AND HOW TO GET SUPPORT

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## Upcoming Sessions in the Series

### Session 3 – JULY 16, 2026

#### TANF Spending Oversight Capacity-Building

Tools and approaches for strengthening internal capacity to monitor and document non-assistance expenditures.

### Session 4 – AUGUST 2026, DATE TBD

#### Data-Informed Program Decision-Making

How agencies can move from collecting data to actively using it in program and budget decisions.

## Get Support

### Program Integrity Resource Library

Practitioner resources on program integrity are available at [peerta.acf.hhs.gov](https://peerta.acf.hhs.gov). Subscribe to the STAR Learning Loop for updates on new resources and upcoming sessions in this series.

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### Request TA

States and Tribes can request individualized technical assistance through the STAR project at [peerta.acf.hhs.gov](https://peerta.acf.hhs.gov).

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### Contact Us

Questions about the session or companion product? Reach us at [STARinfo@blhtech.com](mailto:STARinfo@blhtech.com).