

It's Time for a *Serious* Conservative Welfare Reform Proposal: 5 Tips for Representative Jim Jordan

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A Personal Note from “Peter the Citizen”

Arthur Brooks, president of the American Enterprise Institute, once said, “What is most important on the right is not to shut down the competition of ideas.” I welcome that spirit, and that is why I offer an alternative conservative perspective to the conventional wisdom that the 1996 welfare reform law, and the creation of the Temporary Assistance for Needy Families (TANF) block grant, was an “unprecedented success.” In fact, I argue that TANF is a massive policy failure and should not be held out as an example of “conservatism.” I favor an alternative conservative approach based on a model developed in the Reagan Administration, which provided states flexibility, but had strong accountability provisions – most notably cost neutrality and rigorous evaluation – to ensure that states actually help needy families. For the past two years, I have been writing critiques of TANF and “responses” to those who advocate welfare reform based on the “TANF model.” The ancient Greek philosopher, Diogenes of Sinope, once said, “Other dogs bite only their enemies, whereas I bite also my friends in order to save them.” I am trying to save conservatives and to help them not only “talk the talk,” but also “walk the walk.”

Welfare reform is a timely topic and one of the bills Congress may examine is the “Welfare Reform and Upward Mobility Act,” introduced by Representative Jim Jordan (R–OH) in the House (H.R. 2832) and Senator Mike Lee (R–UT) in the Senate (S. 1290). The stated purposes of the Act are, “To help individuals receiving assistance under means-tested welfare programs obtain self-sufficiency, to provide information on total spending on means-tested welfare programs, to provide an overall spending limit on means-tested welfare programs, and for other purposes.” The key components of the Act include adding a second work requirement to the Temporary Assistance for Needy Families (TANF) “program”²; a new work requirement under the Supplemental Nutrition Assistance Program (SNAP) for adults *with* dependent children³; and a sharp phase-down in funding for means-tested housing assistance.

Representative Jordan promotes his bill as a way to “help” needy families: “It’s a tough-love way to get them to a better position in life. What you find is when work requirements are imposed, that people either go get the skill set they need or they’re doing some volunteer work or they’re doing some job training – they’re helping themselves, bettering themselves.”⁴ I am a conservative who believes in the value of work requirements and, if implemented properly, they might well achieve Representative Jordan’s stated objectives. Sadly, conservatives have yet to design such requirements. They often point the 1996 welfare reform law and the creation of TANF with its work requirements as a model. In reality, TANF’s work requirements are an example of misguided conservative policymaking – they are unreasonable, dysfunctional, and are not about work. Their main function has been to impose barriers and cut caseloads through a process known as “bureaucratic disentanglement.”

The Jordan-Lee bill would not “restart” welfare reform – it would shred the safety net by imposing unreasonable and unattainable work requirements for both TANF and SNAP, with draconian penalties on both states and individuals if they cannot comply with the new requirements.⁵ Conservatives that propose or support the kinds of policies described in this bill are not serious about work requirements or helping the poor – their only real intention is to minimize the federal role in providing a safety net as quickly as possible, under the naïve belief that states will fill the void.

The following five “tips” are intended to help Representative Jordan develop a serious conservative plan – that is, if he actually wants to help needy families.

#1) Scrap the “Welfare Reform and Upward Mobility Act” and start over.

The “Welfare Reform and Upward Mobility Act” does not address the deficiencies of TANF’s work requirements, but instead creates a byzantine administrative structure of three overlapping, but uncoordinated, work requirements – two for TANF and one for SNAP. In a nutshell, its main problems are:

- The Act builds on TANF’s current dysfunctional work requirement and adds a second requirement for “non-working families” and another one for SNAP families with dependent children. It creates an impossible administrative burden on states – each work requirement has its own target population, rules on what activities count and the minimum hours of participation needed for an individual (or family) to count, work rate targets and how they are measured, sanction policies for individuals, and penalties for states.
- For states, the required work rates are unrealistic and unachievable. One of the biggest failures of conservative policymakers is to study the failed implementation of TANF’s work requirements. The Act’s new requirements are even more challenging and there is no reason to believe, based on the TANF experience that states could come close to meeting them.
- For states, the penalties for failing to satisfy the new work rate requirements are unprecedented in their harshness; indeed, for the new TANF requirement, the penalty itself could exceed the amount a state spends on assistance.
- For individuals, the Act extends work requirements in both TANF and SNAP to parents needed in the home to care for a disabled family member and non-citizen parents ineligible for assistance; for TANF, the second work requirement would go so far as to require disabled parents and parents with an infant to participate.⁶
- For individuals, the mandated sanctions for non-compliance are unprecedented in their harshness, and can include the entire TANF/SNAP grant, leaving no safety net. While there is a role for sanctions in welfare programs, sanction policies like other welfare policies should be subject to rigorous evaluation in selected sites before being implemented on a national scale; this Act’s provisions are not based on any evidence

regarding their effectiveness and threaten to throw millions of poor families even deeper into poverty. And, states may have no choice but to penalize them or be subject to draconian penalties themselves.

- There is no recognition of the cost associated with implementing and running welfare-to-work programs. The first year cost could easily be \$10 billion or more, yet the Act makes no provision for additional funding for such work programs.

The result will be predictable – more gimmickry and more poverty. For more detail on the bill, see:

- “The Welfare Reform and Upward Mobility Act: A Conservative Plan to Eviscerate the Safety Net (An Update),” June 11, 2017, available at: <https://petergermanis.com/wp-content/uploads/2021/02/WRandUMA.2017.pdf>.

As I read the details of the Act, I wondered whether the authors were so naïve as to believe that the bill would actually be implemented as described and whether they thought it would actually help poor families. It then occurred to me that the Act is not about helping the poor or upward mobility. It is about sharply reducing the federal role in the safety net under the (again naïve) assumption that states would pick up the shortfall. As Robert Rector and Rachel Sheffield of The Heritage Foundation explain, “Restoring real federalism in welfare would mean that state governments would not only operate welfare programs, but also pay for those programs with state revenues.”⁷ The Act does this directly with means-tested housing, reducing federal funding by 50 percent over 10 years, with the first reductions starting in fiscal year (FY) 2024. With TANF and SNAP, the reduction is more indirect – by imposing unrealistic and unreasonable work requirements, states will either be subject to large penalties or they will be forced to push a large number of families with dependent children off the rolls.⁸ In the case of these programs, the cuts will be almost immediate.

#2) Study the TANF experience to learn from the mistakes of the past.

A press release from Representative Jordan’s office explains that his bill “is modeled off of successful reforms implemented in Maine and the welfare reforms of 1996.”⁹ Most conservatives claim that the 1996 welfare reform law and the creation of TANF, in particular, was an “unprecedented success” and that it should be used as a model for reforming the rest of the safety net. While the law sent a symbolic message about the importance of work requirements and time limits, in practice, neither of these elements have been implemented in the way Congress intended. In fact, TANF is not “welfare reform” at all, but a flexible funding stream that has failed to provide an adequate safety net or an effective welfare-to-work program. In many states, it has become a slush fund used to supplant state spending and fill budget holes. TANF is not a success – it is a massive policy failure and the epitome of dysfunctional conservatism. Addressing all of TANF’s problems is beyond the scope of this paper, but as I explain elsewhere, there are at least 20 reasons why TANF is not “welfare reform,” not a model for reforming the safety net, and not conservatism; see:

- “Saving Speaker Ryan: 20 Reasons Why TANF is NOT ‘Welfare Reform,’ NOT a Model for Reforming the Safety Net, and NOT Conservatism,” April 24, 2016, available at: <https://petergermanis.com/wp-content/uploads/2021/02/Saving-Speaker-Ryan.pdf>.

TANF’s work requirements are perhaps of the most notable example of misguided policymaking – they are unreasonable, dysfunctional, and are not about work. Their main function has been to impose barriers and cut caseloads through a process known as “bureaucratic disenfranchisement.” Even with sharply reduced caseloads, states have resorted to gimmicks to satisfy federal work rate targets that themselves are unreasonable. Such gimmickry does nothing to help the poor get connected to work opportunities. A partial checklist of how conservatives “guttled” the work requirements includes the caseload reduction credit (driving the target rate to 0 percent for 20 to 30 states over the first 15 years of the program), and loopholes like separate state programs (now solely state funded programs), token payments to employed families with full-time workers but who otherwise have no connection to the cash assistance caseload, allowing waiver inconsistencies to carry over from the prior AFDC program, failing to actually define work activities, and excluding able-bodied non-recipient adults even when their children received aid.¹⁰

I have documented these problems extensively; Representative Jordan may be surprised to see how TANF’s work requirements differ from the way he has idealized them.

- “TANF Work Requirements: An Epic Fail,” in *TANF is Broken! It’s Time to Reform “Welfare Reform” (And Fix the Problems, Not Treat their Symptoms)*, July 25, 2015 draft, available at: <https://petergermanis.com/wp-content/uploads/2020/09/TANF-is-Broken.072515.pdf>.
- “The Failure of TANF Work Requirements: A *Much Needed* Tutorial for the Heritage Foundation and the American Enterprise Institute,” August 12, 2016, available at: <https://petergermanis.com/wp-content/uploads/2021/02/The-Failure-of-TANF-Work-Requirements.pdf>.
- “The Failure of TANF Work Requirements in 2015: The Need for ‘A *Much Better Way*,’” December 20, 2016, available at: <https://petergermanis.com/wp-content/uploads/2021/02/The-Failure-of-TANF-Work-Requirements-1.pdf>.

TANF’s work requirements are NOT a model for other programs.

Representative Jordan cites Maine as a model of success. Even a cursory examination of the TANF experience in Maine suggests otherwise. Between 1996 and 2015, the number of poor families with children in Maine increased, from 22,800 to 26,900; nevertheless the number of families receiving cash assistance plummeted from 20,700 to 6,500.¹¹ If TANF’s work requirements were such a success, one would have expected the caseload decline to be accompanied by a reduction in poverty, but that hasn’t happened. Even with sharply reduced caseloads, Maine achieved a work participation rate of just 16.3 percent in 2015 in its TANF program.¹² It only met its work requirement by the use of a gimmick – one that involves artificially inflating the work rate by paying a token payment to families with children that have a full-time worker but otherwise would not receive cash assistance.

Where did Maine get the idea for this gimmick? In 2012, Representative Jordan's state of Ohio was facing \$135 million in penalties for having failed TANF's work rates three consecutive years (FY 2007-2009). In an attempt to avoid these penalties, Governor Kasich submitted a corrective compliance plan to the U.S. Department of Health and Human Services, which if met would void the penalties. The central element of the corrective compliance plan has nothing to do with engaging more families in work activities. Instead, the plan involved the same type of token payments Maine has been using for years. By investing \$4.3 million in what is really a gimmick, the state gutted the work requirement in FY 2012 and in doing so not only met the overall work rate for that year, but wiped out a significant share of the accumulated penalties from prior years.¹³

Gimmicks do nothing to help low-income families get jobs, but many states have responded to TANF's work requirements by cutting their caseloads – and not necessarily by getting them jobs or providing a “hand up.” Ohio appears to have gone in this direction as well. Tara Dolansky of The Center for Community Solutions explains:

Federal rules require 50 percent of OWF [Ohio Works First] single parents in the program to meet work requirements, but the state failed to reach its targets for nearly five years and incurred the threat of large federal financial penalties. From January, 2011, to June, 2013, the number of adults on OWF declined by nearly 64 percent, and the number of children declined by 36 percent. The state met the work requirement because caseloads fell, not because the number of adults completing work assignments increased.

...While OWF recipients are required to work 30 hours each week, the program has had difficulty providing supports or referrals to services such as transportation, mental health and addiction services, legal assistance, and convenient child care necessary to maintain weekly participation. OWF's falling caseloads amid rising poverty are a symptom of the inability of the system to develop solutions that work.

...While the most recent recession is officially over, the recovery has been slow, especially for people struggling to find work and feed their families. Ohio Works First (OWF) is a safety net program that should be there to help people in this situation, but it is being managed in Ohio to focus only on work participation rates, and not connecting people and helping them to maintain, work. ...More needs to be done to move people out of poverty, but this approach is not working.¹⁴

Sadly, this is the TANF experience in much of the nation.

Meanwhile, what did Representative Jordan have to say about the way his own state was meeting TANF's work requirements? Nothing! But, when President Obama proposed giving states flexibility to promote work through waivers of TANF's work requirements in the very midst of Ohio's gimmickry, he said, “President Obama just tore up a basic foundation of the welfare contract.”¹⁵ He also warned, “By waiving the law's requirements, President Obama will make it harder for Americans to escape poverty. He is hurting the very people he claims to help.”¹⁶ The claim by Representative Jordan and other conservatives that President Obama “gutted” work requirements ignores the fact that conservatives themselves created all the gimmicks states have

used since TANF's inception to game its work requirements. Any gutting of work requirements with "waivers" would pale in comparison to the gaming states like Maine and Ohio have undertaken. It is also interesting to note, only one state has submitted a request for waivers – Ohio. (No state actually received waivers.) Notably Governor Kasich was one of the central players in Congress in passing the 1996 law. At least he sees that TANF and its work requirements don't "work"; it is now time for conservatives to look for better solutions. This means rejecting proposals like the "Welfare Reform and Upward Mobility Act," because that would, in Representative Jordan's own words, be "hurting the very people he claims to help."

#3) Base your "welfare reform" proposals on *credible* evidence, not on junk science and inappropriate generalizations.

Representative Jordan suggests that the "Welfare Reform and Upward Mobility Act" is just "an extension of Clinton's entitlement reform." In a discussion with *Vox's* Tara Golshan, as evidence of TANF's success, he cited the 2006 testimony from Ron Haskins, a senior fellow at the Brookings Institution and as a congressional staffer considered the "architect" of "welfare reform."¹⁷ Apparently, Representative Jordan was unaware that Haskins has a somewhat different view today, recently stating, "States did not uphold their end of the bargain. So why do something like this again?"¹⁸ He was particularly clear about the failure of TANF's work requirements, stating "Congress and the administration would be well advised to carefully consider ways TANF could be reformed to minimize the game playing that many states now use to avoid spending TANF dollars on core TANF purposes and to avoid the federal work requirement."¹⁹

Golshan describes Representative Jordan's reaction to this revelation:

Asked what he thought of Haskins's change in sentiment, Jordan was unfazed, and pulled a different annotated paper off his desk, reading aloud from a Foundation for Government Accountability report on Kansas.

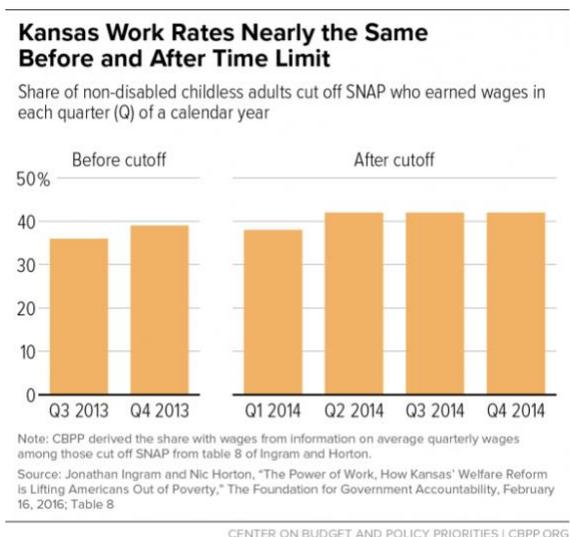
"Since implementing work requirements and time limits, the number of able-bodied adults on food stamps has dropped by 75 percent. Nearly 60 percent of those leaving food stamps found employment within 12 months and their incomes rose by an average of 127 percent per year."²⁰

There are two HUGE problems with this response. First, the Foundation for Government Accountability (FGA) study Representative Jordan cites regarding the SNAP "work requirement" (really, a time limit) for able-bodied adults without dependents is not a credible basis for making judgments about the policy's impact. The authors track the employment and earnings of a cohort of individuals affected by the policy change, but they confuse data collection with evaluation. They have no real counterfactual upon which to base claims of success and simply assume that any change in the outcomes they observed are the direct result of the "work requirement."

Even if one found a simplistic pre-post study to be a convincing approach to causality (and that would be a mistake), many of the claims are inappropriate and misleading. For example,

Representative Jordan seems persuaded by the claim that “nearly 60 percent of those leaving food stamps found employment within 12 months.” The FGA’s characterization of the employment rate leaves the impression that the SNAP “work requirement” caused the increase, because the report provides no reference point. The authors don’t include the baseline employment rate. For a pre-post study, this is extremely sloppy and misleading. The fact that nearly 60 percent of leavers “found” employment would be impressive if none were employed during the baseline quarter, but that wasn’t the case – about 40 percent were employed.

In addition, instead of reporting quarterly employment rates, the authors use an employment rate based on any “record of employment since Q4 2013” – the baseline quarter. Comparing a quarterly employment rate for the baseline (or “pre”) period to an “ever-employed” over the course of a year employment rate (or “post”) period would be comparing apples to oranges. Even with a simple pre-post study, what is needed is a comparison of the quarterly employment rate in the baseline quarter to a quarterly employment rate to a subsequent quarter. The FGA does not make this comparison, but the data in their report permit its calculation. Here’s what the employment rate looks like when measured on an apples-to-apples basis:



Even based on the simplistic pre-post methodology, the results are hardly striking. This is just one of many problems with the FGA’s report; I elaborate in detail on its problems in:

- “The FGA’s ‘First of Its Kind Study’ Should Have Been the Last: An Evaluation Note for Pre-Post Conservatives,” July 4, 2017, available at: <https://petergermanis.com/wp-content/uploads/2021/02/The-FGA.FF.pdf>.

The FGA’s analysis of the same reform in Maine is equally flawed, as is their interpretation of Maine’s three-year time limit for TANF. Again, I have written about the problems of these reports:

- “Using Squirrely Data is No Way to Justify Conservative Policies: A Note to AEI’s Marc Thiessen,” July 8, 2017, available at: <https://petergermanis.com/wp-content/uploads/2021/02/Thiessen.pdf>.
- “Maine DOES NOT Show How to Make Welfare Work: A Response to Jared Meyer and Mary Mayhew,” June 4, 2017, available at: <https://petergermanis.com/wp-content/uploads/2021/02/Meyer.pdf>.

Despite the problems in these reports, some policymakers use them to justify their proposals. Remember, Representative Jordan’s press release states that the “Welfare Reform and Upward Mobility Act” is “modeled off of successful reforms implemented in Maine.”²¹ And, Representative Jordan asserted, “It’s a tough-love way to get them to a better position in life.”²² Even a cursory examination of the available data in Kansas and Maine suggests that they are not the successes Representative Jordan believes them to be and that the requirements made far more families worse off than better off.

The second problem with Representative Jordan’s citation of the Kansas report is that its findings, even if they were believable, would not be generalizable to other programs or populations – in particular, they are not a basis for the kinds of changes the “Welfare Reform and Upward Mobility Act” would make to work requirements for TANF and to SNAP adults with dependent children.

#4) Show some empathy for vulnerable families.

Representative Jordan suggests that his approach of “tough love” would help needy families. His office “pushes back against the idea that these work requirements would cause hardship for the poor.”²³ His spokesperson, Darin Miller, recently “explained” the Congressman’s position as follows:

“If an individual leaves the SNAP program without getting a job, then they must either have not needed the benefits in the first place or have found another way of obtaining the benefits they need. Either way, we are saving money without hurting anyone.”²⁴

This is an unbelievably uninformed and uncaring viewpoint. A careful evaluation, unlike the “studies” Representative Jordan cites, would examine not only the impacts of a “work requirement” using a credible counterfactual, but would also assess the implementation of the policy, e.g., to examine the screening process, the activities that were offered, the reasons for participation or non-participation, and perhaps most important to follow-up with a sample of those who exited to find out how they were coping. Beyond the screening process, it is also important to examine how the state notified recipients of the new “work requirements,” whether recipients understood them, and to assess the actual help that was offered and actually provided. To simply assume the benefits are “not needed” is no way to conduct public policy.

Many of those subject to SNAP’s “work requirement” for adults without dependents face barriers to employment, such as physical and mental health limitations, limited education and work histories, criminal records, and a host of other challenges. There are indications that some of those cut off assistance have fallen through the cracks. Chris Hastedt, public policy director at

Maine Equal Justice Partners, explains: “We see many, many, many people who fall through the cracks.”²⁵ She notes that some of those who lost their SNAP benefits had difficulty verifying their medical conditions, “And that’s simply because they don’t have medical insurance, they don’t have a doctor that they can go to, to say, ‘Please verify the fact that I’m not able to work right now.’”²⁶ And, it’s not an entirely obvious that those affected by the policy have access to promised services. One homeless veteran in Maine whose benefits were cut off said that he went to the Department of Health and Human Services and asked to volunteer, but explained “they didn’t feel comfortable sending me into a volunteer position.”²⁷ These may be anomalies, but the studies Representative Jordan likes to cite make no attempt to get to the truth. When public policies involve cutting families off assistance entirely, it is particularly important to have an *independent* evaluator report on how those policies are implemented and to find out more about how those cut off aid coped with the loss of benefits.

Perhaps even more troubling is the fact that Representative Jordan has no qualms about generalizing from seriously flawed studies of a “work requirement” for able-bodied adults *without* dependents to the approximately 4 to 5 million families *with* children that would be affected by his new work requirements.

#5) Adopt an evidence-based “welfare reform” approach.

In describing his vision of welfare reform, Speaker Ryan has emphasized the importance of building an evidence base:

...let states try different ways of providing aid and then to test the results – in short, more flexibility in exchange for more accountability. ...Put the emphasis on results. ...[w]e would not expand the program until all the evidence was in. The point is, don’t just pass a law and hope for the best. If you’ve got an idea, let’s try it. Test it. See what works. Don’t make promise after promise. Let success build on success.²⁸

This approach is exactly right; sadly, TANF did just the opposite. There is no requirement for states to evaluate their policy changes. Now, 20 years after TANF’s creation, there is little rigorous evidence to inform policymakers about work requirements, time limits, sanctions, family caps, diversion programs, and an array of other provisions. Some policies have undoubtedly helped families move toward self-sufficiency, others have just as surely pushed them deeper into poverty.

In fact, TANF replaced an evidence-based welfare reform model, which had strict accountability measures, one started by President Reagan. In 1987, the Reagan Administration began encouraging states to use existing authority to conduct welfare reform experiments – through waivers of AFDC’s rigid rules (and, to a lesser extent, food stamp and Medicaid rules due to more limited waiver authorities for those programs). This approach was continued by President Bush and President Clinton. This process did not provide a fixed level of funding, like block grants. Instead, it relied on an approach that would provide a real counterfactual using the “gold standard” of evaluation – random assignment.²⁹ It provided rigorous evidence about the impacts of welfare reform, including many examples of state experiments that increased employment and earnings, and also reduced welfare dependency and poverty.³⁰ The next step would have been to

refine this process and expand waiver authorities in other programs. We now have to start over, but this evidence-based approach is the responsible conservative approach.

Conclusion

Even if one believes that turning the responsibility for safety net programs to the states is a good idea, to think that the transition could be completed *smoothly* in a few years is taking a huge gamble with the lives of our most vulnerable families. The “Welfare Reform and Upward Mobility Act” would surely exacerbate poverty by imposing impossible and exceptionally harsh work requirements; if Representative Jordan believes this is the path forward, a more responsible approach would be to test it by implementing it in Ohio and Utah first (home states to Representative Jordan and Senator Lee), followed by national implementation two to three years later. If the early implementation experiences are as positive as Representative Jordan believes, the nation can move forward confidently. If, however, as is more likely, the administrative challenges and hardships imposed by the Act are revealed, we can avoid a *national* tragedy.

¹ The views in this document reflect my own as a citizen and do not reflect the views of any organization I am now or have ever been affiliated with. By way of background, I am a conservative and have worked on welfare issues for the Heritage Foundation, the American Enterprise Institute, and the White House under both President Reagan and President George H.W. Bush. This paper assumes the reader has a basic understanding of the TANF program, but for those readers who want more context and background, see Peter Germanis, *TANF is Broken! It's Time to Reform "Welfare Reform" (And Fix the Problems, Not Treat their Symptoms)*, July 25, 2015 draft, available at: <https://petergermanis.com/wp-content/uploads/2020/09/TANF-is-Broken.072515.pdf>.

² In describing TANF, I use quotation marks around the word "program"; TANF is not really a program; it is really just a form of revenue sharing with a myriad of dysfunctional requirements when states use the funds to provide cash assistance to needy families; when they use the funds for other purposes, it is essentially a blank check with no accountability.

³ The Act also includes modifications to work requirements for adults without dependent children.

⁴ Joel Gehrke, "Republicans focus on food stamps as part of major welfare reform," *Washington Examiner*, June 26, 2017, available at: <http://www.washingtonexaminer.com/republicans-focus-on-food-stamps-as-part-of-major-welfare-reform/article/2626634>.

⁵ Peter Germanis, "The Welfare Reform and Upward Mobility Act: A Conservative Plan to Eviscerate the Safety Net (An Update)," June 11, 2017, available at: <https://petergermanis.com/wp-content/uploads/2021/02/WRandUMA.2017.pdf>.

⁶ Technically, these requirements relate to what the state can count toward their work participation requirements. Adding these hard-to-serve groups will make it harder for states to achieve them and may force them to try to engage the families or sanction them.

⁷ Robert Rector and Rachel Sheffield, "Setting Priorities for Welfare Reform," The Heritage Foundation, February 24, 2016, available at: <http://www.heritage.org/research/reports/2016/02/setting-priorities-for-welfare-reform>.

⁸ With TANF the reduction is even more indirect. TANF is a fixed federal block grant, so any reduction in caseloads would not lead to federal savings, but rather would give states more funds to use for other purposes. However, as TANF continues to evolve for a basic assistance "program" for needy families to a slush fund, it is also more likely to be seen as such and Congress is more likely to cut its funding.

⁹ Office of U.S. Congressman Jim Jordan, "Jordan introduces SNAP reform bill to emphasize work," Press Release, June 9, 2017, available at: <https://jordan.house.gov/news/documentsingle.aspx?DocumentID=398134>.

¹⁰ The waiver inconsistencies loophole expired and Congress required the U.S. Department of Health and Human Services to define work activities and who is required to participate in work activities in the Deficit Reduction Act of 2005, thus closing some of the loopholes, but others have become more prominent.

¹¹ Center on Budget and Policy Priorities, "Maine: TANF Caseload and TANF-to-Poverty Ratio Fact Sheet," available at: https://www.cbpp.org/sites/default/files/atoms/files/tanf_trends_me.pdf.

¹² See U.S. Department of Health and Human Services, Administration for Children and Families, Office of Family Assistance, "Work Participation Rates – Fiscal Year 2015," Table 1B, December 15, 2016, available at: <https://www.acf.hhs.gov/ofa/resource/work-participation-rates-fiscal-year-2015>. Note the difference between the TANF and the SSP-MOE work rate; the latter represents the funding stream for the group receiving the token payment.

¹³ The state still did not meet the two-parent rate even with the gimmick, so it may be liable for a penalty, but much smaller than had it failed the overall rate.

¹⁴ Tara Dolansky, "Ohio Works First is a Flawed Model for a Workforce Program," *State Budgeting Matters*, vol. 9, no. 5, September 2013, available at: http://www.communitysolutions.com/assets/docs/State_Budgeting_Matters/sbmv9n5sped_owf_dolansky_091113.pdf.

¹⁵ Caroline May, "Obama administration 'guts' welfare reform with new HHS rule," *The Daily Caller*, July 13, 2012, available at: <http://dailycaller.com/2012/07/13/hhs-to-offer-waivers-for-tanf-work-requirement/>.

¹⁶ Rob Bluey, "Obama Administration Guts Work Requirements For Clinton-Era Welfare Reform," *Hot Air*, July 13, 2012, available at: <http://hotair.com/archives/2012/07/13/obama-administration-guts-work-requirements-for-clinton-era-welfare-reform/>.

¹⁷ Tara Golshan, "The return of welfare reform," *Vox*, June 30, 2017, available at: <https://www.vox.com/policy-and-politics/2017/6/30/15829998/return-welfare-reform-budget>.

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- ¹⁸ Eduardo Porter, “The Republican Party’s Strategy to Ignore Poverty,” *The New York Times*, October 27, 2015, available at: <http://www.nytimes.com/2015/10/28/business/economy/a-strategy-to-ignore-poverty.html>.
- ¹⁹ Ron Haskins, “TANF at Age 20: Work Still Works,” *Journal of Policy Analysis and Management*, Winter 2015, available at: <https://petergermanis.com/wp-content/uploads/2020/09/Haskins2015Age.pdf>.
- ²⁰ Tara Golshan, “Conservative lawmakers think cuts to food stamps won’t hurt anyone. Evidence says that’s wrong.” *Vox*, July 7, 2017, available at: <https://www.vox.com/policy-and-politics/2017/7/7/15894168/conservative-cut-food-stamp-evidence>.
- ²¹ Office of U.S. Congressman Jim Jordan, “Jordan introduces SNAP reform bill to emphasize work,” Press Release, June 9, 2017, available at: <https://jordan.house.gov/news/documentsingle.aspx?DocumentID=398134>.
- ²² Tara Golshan, “The return of welfare reform,” *Vox*, June 30, 2017, available at: <https://www.vox.com/policy-and-politics/2017/6/30/15829998/return-welfare-reform-budget>.
- ²³ Tara Golshan, “The return of welfare reform,” *Vox*, June 30, 2017, available at: <https://www.vox.com/policy-and-politics/2017/6/30/15829998/return-welfare-reform-budget>.
- ²⁴ Tara Golshan, “The return of welfare reform,” *Vox*, June 30, 2017, available at: <https://www.vox.com/policy-and-politics/2017/6/30/15829998/return-welfare-reform-budget>.
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