Explaining Welfare Reform Tweet by Tweet:
A Response to Mickey Kaus

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Recent weeks have seen several new child allowance proposals. Senator Romney's plan would provide monthly cash payments of $350 for each child under six and $250 for each child from age 6 to 17. President Biden' plan calls for making the child tax credit refundable with monthly cash payments of $300 for each child under 6 and $250 for older children. Aside from minor differences in payment amounts, the two plans differ with respect to the administering authority, the phase out of benefits (for upper income families), and the cap on lifetime benefits (see table below for a description of the current child tax credit and three alternative proposals, including the Biden and Romney plans).

	Current	Biden	Romney	Bruenig
Phase-In Start	$2,500	None	None	None
Phase-In Rate	15%	None	None	None
Phase-Out Start	$200K/$400K	Unspecified	$200K/$400K	None
Phase-Out Rate	5%	Unspecified	5%	None
Benefit Prior to Birth	$0	$0	$1,400	$0
Annual Benefit for Ages 0-5	$2,000	$3,600	$4,200	$4,488
Annual Benefit for Ages 6-16	$2,000	$3,000	$3,000	$4,488
Annual Benefit for Age 17	$0	$3,000	$3,000	$4,488
Annual Benefit for Age 18	$0	$0	$0	$4,488
Annual Benefit Cap for Family	None	None	$15,000	None
Total Lifetime Benefit Per Child	$34,000	$57,600	$62,600	$85,272
Paid Out Monthly	No	Yes	Yes	Yes
Benefit Administrator	IRS	IRS	SSA	SSA

Source: Matt Bruenig, "Romney's Child Allowance Improves on Biden Proposal," February 4, 2021, available at: https://www.peoplespolicyproject.org/2021/02/04/romneys-child-allowance-improves-on-biden-proposal/.

Predictably, many conservatives have raised objections to this approach, citing potential work disincentive effects and warning that a "no strings" child allowance would return us to the days of the Aid to Families with Dependent Children (AFDC) program. One of the most vocal critics of a child allowance on Twitter is Mickey Kaus – a journalist, blogger, and author of *The End of Equality* (Basic Books, 1992). Kaus argues that a child allowance would be a major work disincentive, recreate the AFDC program, and undo the putative "success" of the 1996 welfare reform, which created the Temporary Assistance for Needy Families (TANF) block grant.

Most of Kaus' tweets reflect oversimplified conservative talking points that are either wrong, misleading, unsupported, or ignore important contextual information. This "Peter the Citizen" response critiques many of Kaus' tweets, roughly in chronological order, and follows each with a "PC Response" – short for "Peter the Citizen." My criticism of Kaus' arguments does not mean I endorse any particular child allowance proposal, because I have concerns about cost and targeting, but the failure of the 1996 welfare reform does support the case for a new approach and some type of child allowance does seem warranted.

@kausmickey (2/4/21): "Clearly the plan of Obama HHS officials (eg Mark Greenberg) was to drastically water down the work requirements."

PC Response: This tweet is the first in a series of tweets about the child allowance, welfare reform, TANF, and work requirements. More than any other, this tweet reflects how uniformed Kaus is with respect to "welfare reform" under TANF.

When the U.S. Department of Health and Human Services (HHS) issued guidance in July of 2012 to give states more flexibility to test alternative welfare-to-work programs in their TANF program, Robert Rector issued a series of papers with headlines like: "Obama Administration Ends Welfare Reform as We Know It" and "How Obama has Gutted Welfare Reform."[2] In an interview, Rector admits to being the primary author: "I happen to have written most of these requirements. What the Obama administration has done is taken these and said (tears a sheet of paper). 'They are gone! They are out of the picture.'" Kaus apparently bought into this storyline without doing any analysis of his own. If he had, he would have learned that any "gutting" of work requirements under waivers would have paled in comparison to the misguided provisions and loopholes states have used since TANF's inception to avoid engaging families in work activities under the law.

> Note: TANF's work requirements have many problems – they are unreasonable for recipients, unrealistic for states, needlessly complicated and inflexible, and not based on credible research. TANF's work requirements have never operated effectively to engage families in work activities. *The response to this tweet is limited to Kaus' erroneous claim that the Obama plan was "to drastically water down the work requirements."*

TANF's Work Requirement Loopholes. The following description is an abbreviated summary of *some* of TANF's work requirement loopholes. Some of the loopholes were closed in the Deficit Reduction Act of 2005 (DRA), but they are listed here to emphasize the importance of paying attention to policy details and the need to anticipate unintended consequences. As long as TANF is a block grant with excessive state flexibility, loopholes will remain. Douglas Besharov and I noted this fact back in 2004 stating, "the structure of the TANF block grant would enable states to avoid *all* additional participation requirements…"[3]

- *The caseload reduction credit.*[4] The 1996 law established an overall work participation rate by requiring that at least 50 percent of TANF families with an adult engage in specified work activities. The caseload reduction credit reduced the work participation rate target a state must meet to the extent it lowered its caseload below FY 1995 levels (changed to FY 2005 starting in FY 2007). For most years since TANF's inception, 15 to 30 states faced a 0 percent work target for the overall rate (meaning that to avoid a penalty, they had to engage 0 percent of their caseload).

- *Limiting work requirements to TANF adult recipients.* TANF work requirements initially were applied to a family with an adult receiving assistance. In some states, sanction policies and time limits removed an adult's needs from the benefit calculation. Since no adult was receiving assistance, the family was no longer included in the work participation rate calculation, even though the adult was able-bodied and the children continued to receive assistance. After the DRA, the work requirements included families with a "work-eligible individual" (including some non-recipient parents).

- *Excess MOE provision of the caseload reduction credit*. The DRA recalibrated the base year for caseload reduction credit from FY 1995 to FY 2005. In many states, caseload declines had stalled, but the "excess MOE" [MOE refers to a state's maintenance-of-effort expenditures] provision allows a state that is investing state MOE funds in excess of its basic MOE requirement to include only the pro rata share of caseloads receiving assistance that is required to meet basic MOE requirements. This led many states to simply find more third-party spending to count as MOE, including third-party nongovernmental expenditures, just so that they could artificially inflate the caseload reduction credit. And, reported MOE did rise sharply – from $12 billion in FY 2006 to $13.7 billion in FY 2008 to over $15 billion in FY 2009 and most subsequent years.

  A May 2012 report by the Government Accountability Office (GAO), explained the growing significance of this provision:

  > MOE is now playing an expanded role in TANF programs, as many states' excess MOE spending has helped them meet work participation rates. While one state had used MOE expenditures toward its caseload reduction credit before fiscal year 2007, over half of the states (27) relied on these expenditures to increase their credits and help them meet their required work participation rates in one or more years between fiscal years 2007 and 2009.[5]

  It further noted:

  > In fiscal year 2009, 32 of the 45 states that met their required work participation rates for all TANF families claimed excess state MOE spending toward their caseload reduction credits. Sixteen of these states would not have met their rates without claiming these expenditures.[6]

  Subsequent changes in law and regulation have limited the extent to which this provision inflates the credit, but it is still used by a majority of states.

- *Separate state programs.* Until FY 2007, families assisted through MOE-funded separate state programs were not subject to TANF's work requirements. Congress was either careless in writing the law by failing to include families receiving assistance with "qualifying state expenditures" or it intentionally created a massive loophole. By FY 2005, over half the states had such programs and their primary purpose was to remove families from the work rate calculation, particularly those families that would not meet the standards required to count in the work rate, most notably two-parent families, because they faced a second, more stringent 90 percent work participation rate target. States also moved other families that were not likely to meet the work requirements to these separate state programs, including those applying for SSI, with employment barriers, or caring for a disabled family member.

- *Solely state funded programs.* Congress eliminated the separate state program loophole in the DRA by requiring states to include such families in the work participation rate calculation. This simply led to a new loophole – the solely state funded program. The Center for Public Policy Priorities describes this approach for meeting work rates as the "take-out strategy":

  > Under this approach, states divide TANF recipients into two categories: those likely to meet federal work requirements and those unlikely to meet the requirements. States then provide assistance to those recipients unlikely to meet the requirements with non-MOE state funds.[7]

  Liz Schott and Sharon Parrott of the Center on Budget and Policy Priorities described how this funding approach can work without the need for additional state funds:

  > The state funding for benefits and administration of a solely state-funded program, by definition, does not count toward the state's maintenance-of-effort requirement. This does not mean, however, that additional state spending is required for a state to implement such an approach. SSFs typically serve families that otherwise would be served in the state's TANF- and MOE-funded programs, so establishing the SSF does not increase overall state assistance costs. If a state does not want to increase state expenditures, it can "swap" funding by identifying current state expenditures that it could count (but has not counted in the past) toward the TANF maintenance-of-effort requirement to allow the state to fund the SSF program with state funds that do not need to be claimed toward the MOE requirement. It also could do a similar swap with TANF funds.[8]

  In a 2008 survey, Mathematica found that 26 states had adopted solely state funded programs, 24 of which used them to serve two-parent families, 14 to serve hard-to-employ families, and 7 to serve families in college.[9] (The number of states with such programs probably would have been larger, but in FY 2008 over 20 states had a 0 percent target rate due to the caseload reduction credit.) Since then, the number of states with solely state funded programs and the number of families in such programs has grown.[10] In some states, they account for as much as half the state's cash assistance caseload.

- *The failure to define work activities.* When Congress wrote the TANF statute, it "defined" work activities simply by listing 12 activities, leaving it to states to develop their own definitions. Some states defined work activities to include bed rest and personal care activities as part of recovery from a medical problem, physical rehabilitation including massage and exercise, personal journaling and motivational reading, participation in a smoking cessation program, and other activities typically not considered "work activities." The DRA required HHS to define work activities, instead of just listing them, but this shows what can happen when policymakers don't pay attention to policy details.

- *Waiver inconsistencies.* States with section 1115 welfare reform waivers when the 1996 welfare reform law was enacted were allowed to continue the waiver policy to the extent it was inconsistent with TANF through the end of the approved project period. While states still had to meet the new work participation rate targets, they could continue to operate under pre-TANF policies that often gave them a distinct advantage in the meeting these rates. Twenty states continued such waivers, which included provisions related to exemptions, countable work activities, and hours of participation. Aside from weakening TANF's work requirements, it is unclear why Congress thought it was fair to give some states such an advantage in meeting their work targets (and potentially avoiding a financial penalty) for as long as 5 to 10 years after enactment of TANF.

- *Counting "unsubsidized employment" as an activity.* Under AFDC/JOBS, a full-time worker was exempt from participation requirements; TANF made it a countable activity. This made it considerably easier for states to meet their work rate targets. The states that gained most from this decision are those with the highest breakeven levels (which are a function of the generosity of benefits and earnings disregards). This was basically a windfall for states in being able to count individuals as "participants" and combined with the caseload reduction credit meant that most states had to do little or nothing in terms of placing individuals in actual work or training activities. Indeed, participation in actual work activities has plummeted since TANF was created, falling even faster than the caseload.

- *"Unsubsidized employment" as a "gimmick."* Some states seek out families not receiving TANF cash assistance, but with a full-time worker and a child in the household, to give them a "token payment" (e.g., $10 a month) with TANF or MOE funds. (These families are often found on the SNAP caseload.) This adds them to the numerator and denominator of the work participation rate calculation and because these cases have a participation rate of nearly 100 percent, doing so artificially inflates the state's overall work rate.

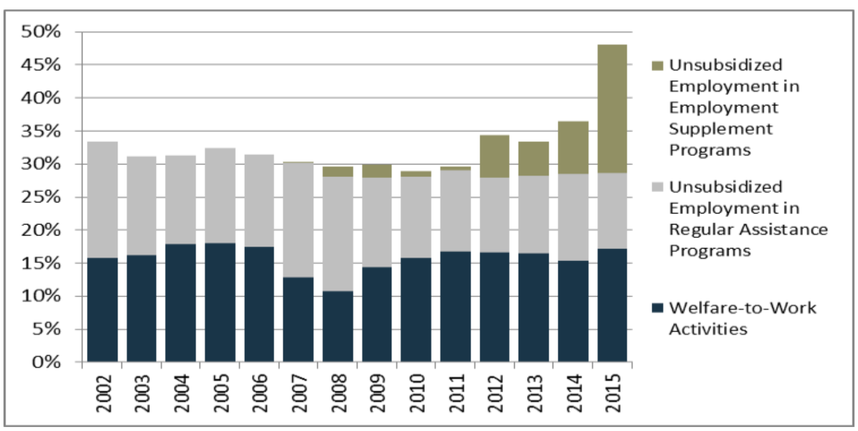
  Example: In an attempt to avoid about $135 million in penalties, in 2011 Governor Kasich of Ohio submitted a corrective compliance plan to address three years of failing to meet work rates (2007 to 2009 – before he became governor).[11] The central element of the corrective compliance plan had nothing to do with engaging more families in work activities. Instead, the plan would make $10 payments to SNAP participants who have a child and have enough work hours to be counted toward the TANF work rate.[12] Here is how officials at the Ohio Department of Jobs and Family Services (ODJFS) describe the action:

  > ODJFS also initiated the Ohio Works Now Program, which provided a $10 monthly OWF benefit to families on the Food Assistance Program who were working. By receiving this benefit, these working families could be counted toward the state's TANF work participation rate. This program was only in effect from January to June 2012. About 72,323 assistance groups received benefits on average each month. Benefits totaled $4.3 million and were paid from TANF funds.[13]

In fiscal year (FY) 2012, Ohio's target rate was 50 percent; it achieved an overall rate of 43.8 percent, but the token payment caseload had a 98.7 percent, bringing the combined (i.e., official) work rate to 61.9 percent. So, by investing $4.3 million in what is really a gimmick, the state manipulated the work requirement and in doing so not only met the overall rate for that year, but reduced a significant share of penalties from prior years.[14] This did virtually nothing to help low-income families get jobs and wasted federal and state staff time dealing with a gimmick. In FY 2019, these cases account for over 15 percent of the TANF/SSP caseload; they have nothing to do with "welfare reform," yet they will dominate the countable participants in the work participation rate. This gimmick is possible because "unsubsidized employment" an activity; it would not have been available if it had remained an exemption as under AFDC-JOBS.

The Reality. Despite a statutory target of 50 percent, states have typically achieved a work rate well below that – about 30 percent. Figure 1 below (from the Congressional Research Service) shows the national average TANF work participation rate from FY 2002 to FY 2015.[15] It divides the rate into three components: welfare-to-work activities (e.g., job search and job readiness assistance, work experience, community service, and vocational educational training), unsubsidized employment, and "unsubsidized employment in employment supplement programs." As the figure demonstrates, TANF has never been particularly successful in engaging families in real "welfare to-work activities," with only about 15 percent of those required to participate engaged in an actual welfare-to-work activity for enough hours to count. Another 15 percent have typically been in unsubsidized employment, combining work and welfare. The growth in token payment cases (called "employment supplement programs" in the figure) began in FY 2007, an unintended response to the DRA. It does not reflect real engagement but is a gimmick used by states to artificially inflate the work rate.

Figure 1: TANF Work Participation Rate, by Type of Activity
(FY 2002 – FY 2015)



Source: Gene Falk, "Temporary Assistance for Needy Families (TANF): The Work Participation Standard and Engagement in Welfare-to-Work Activities," Congressional Research Service, February 1, 2017, p. 10, available at: https://www.everycrsreport.com/files/20170201_R44751_b7093fe9349fcb8c25170eca4d9725d907ad535e.pdf.

Who Really Watered Down TANF's Work Requirements? Kaus suggests President Obama's plan was to water down TANF's work requirements. As described above, states can and do "water down" the requirements through many of the aforementioned loopholes. They don't need waivers to circumvent them, so, the short answer is: "Robert Rector," who played an instrumental role in drafting them.

The waiver proposal was intended to encourage states to test rigorously (e.g., with a randomized control trial) the impact of alternative welfare-to-work models. This was an evidence-based approach used in AFDC prior to TANF that had meaningful accountability. Moreover, because TANF's work requirements (e.g., participation targets for states, minimum hourly requirements, countable activities, etc.) have little basis in research, the waiver strategy would have been an opportunity to build an evidence base for subsequent reauthorization.

If Kaus wants to opine about welfare reform and work requirements, he would do well to study the actual implementation of the law.

@kausmickey (2/4/21): "At some point the child allowance becomes so large that you've recreated the old welfare (AFDC) program and enabled families to NOT work at all. Negative social consequences ensue."

PC Response: A child allowance differs from AFDC in a variety of respects and to equate them is a mistake. In particular, a child allowance: has a more equitable funding structure that is more responsive to economic and demographic changes; reaches more low-income families due to its higher income limits; lowers effective marginal tax rates for those with low incomes; ensures a minimum benefit; is administered by the federal government (vs. states, subject to federal guidelines); and is much simpler in terms of eligibility and benefit calculation rules. While conservatives may bemoan the absence of a work requirement, any objective analysis would show that TANF's work requirements do little to actually engage families and are designed to push families off assistance rather than help them leave because they have become more employable.

Kaus argues that the size of the child allowance "becomes so large that you've recreated the old welfare (AFDC) program." To the extent one is concerned about labor market effects, the disincentive to work would arise not so much because of the "size" of the benefit, but because it would provide benefits to poor families that are not served by TANF. As Matt Weidinger notes, in 29 states the child allowance is less than maximum inflation-adjusted AFDC check for a single parent with two children.[16] In the 21 states where benefits would have been higher under a child allowance, the amount of the short-fall is relatively small – in 8 states its less than $100 month and in in 14 it's less than $200 a month. For those that receive cash assistance, the difference a child allowance might provide is small – the main effect would be to reduce their marginal tax rate (vs. AFDC) for going to work.

Kaus also suggests that size of the benefit may enable "families to NOT work at all." There is no definitive evidence regarding the potential size of the labor market effects associated with a child allowance, but most experts (e.g., the National Academies of Sciences) *do not* estimate the overall impact to be large.[17] They based their estimates on a careful review of the empirical data. In contrast, Kaus appears to base his conclusions on pure speculation.

Kaus provides no evidence about the "negative social consequences" that may ensue; simply pointing back to AFDC and making vague statements that families would be "enabled NOT to work" is not evidence. There are several reasons why Kaus' conclusion may be wrong. First, today's safety net is very different than it was during the preTANF AFDC period, particularly with respect to incentives for work. Second, a child allowance would eliminate the work disincentivizing effect of the phase out of AFDC benefits (i.e., the marginal tax rate). Third, additional income to very poor households is associated with a variety of positive outcomes for children in adulthood (not to mention the present). Hilary Hoynes and Diane Schanzenbach examine the research on this topic and conclude:

> Furthermore, there are strong returns across the cash, tax based, near cash and health insurance programs that we examine, with potentially larger impacts for the most disadvantaged children. These consistent findings imply that we are spending too little on children and their families. Additionally, the decline in availability of benefits for the most disadvantaged children, primarily due to welfare reform, is likely to lead to worse outcomes for these children in adulthood. Any cuts to current programs that will reduce resources going to children would have direct, negative impacts on children in both the short- and long-term.[18]

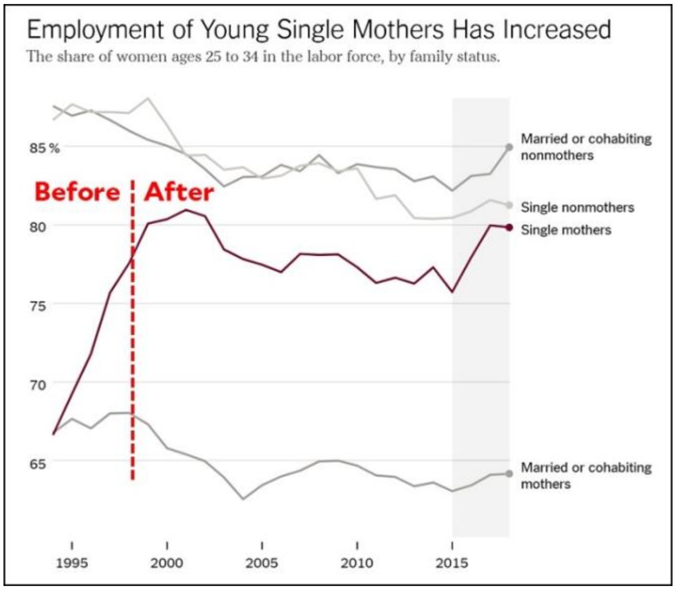
This finding is echoed by many academics, supported by empirical studies, most recently in a cost-benefit analysis of a child allowance by researchers at Columbia University.[19] The researchers identified a range of benefits, including increase children's health, education, and future earnings and decrease health, child protection, and criminal justice costs.

Meanwhile, Kaus bases his conclusion that "negative social consequences ensue" on nothing more than his opinion. He could at least try to explain why he believes an annual income of $12,400 would "enable" a family to avoid work (per a @kausmickey tweet on 2/21/2021), given that the poverty line for a single mother with two children is about $22,000.

@kausmickey (2/4/21): "Ending AFDC in 1996 had a huge positive work force effect – work by unmarried mothers took a huge jump. Re-creating welfare might be expected to have a negative effect."

PC Response: Kaus confuses correlation with causation and makes unsupported claims regarding the potential impact of a child allowance.

First, employment rates were rising sharply before TANF was implemented by states in 1997/1998; it is unreasonable to think this trend would have come to a sudden stop had TANF not been enacted. A recent post by Kevin Drum illustrates the before and after change in employment of young single mothers.[20] As indicated in the figure below, most of the increase occurred before the implementation of the 1996 welfare reform law. As Drum observes, "In fact, just a glance at the numbers makes it clear that welfare reform, at most, raised labor participation only slightly above where it was already at."



Second, there are many factors that contributed to the "positive work force effect" Kaus cites, most notably the strong economy and the expansion of programs/policies designed to "make work pay" that occurred during this same time frame. There were other possible factors, as Drum observes, "But if it wasn't welfare reform that did it, what was it? The burnout of the crack epidemic? A new generation of single mothers who were less lead poisoned than earlier generations? Some kind of weird statistical artifact? I don't know, but from the very beginning there's been something of a puzzle about why single mothers started entering the workforce in large numbers before welfare reform passed and before the economic boom of the late '90s started up. There are mysteries here that deserve a look."

Third, even if one believes welfare reform was responsible for the increase in employment, what part of it should be credited. TANF added little to the flexibility states had with respect to cash assistance and TANF's work requirements were actually weaker than those under AFDC-JOBS (due to the caseload reduction credit and a myriad of loopholes). From 1997 to 2000, the main causal factors were the strong work message and a huge federal windfall in funding, some of which did go to child care and work supports. Over time, the work message weakened and the windfall disappeared and many states diverted money to fill budget holes.

Fourth, employment (and poverty) impacts from random assignments experiments of "welfare reform" and "welfare-to-work programs" conducted during the 1990s showed much more modest effects than indicated by the pre-post changes Kaus uses as evidence. This suggests factors other than welfare reform were responsible for much of the employment increase.

Finally, any employment gains, even if attributable to "ending AFDC" pale in comparison to caseload decline. Policymaking involves trade-offs. The main effect of the 1996 "reform" was to reduce caseloads by pushing eligible families off the rolls, not employment. This is reflected in conclusions reached by the nonpartisan Government Accountability Office (GAO) and the Congressional Research Service (CRS). The GAO from 2010:

> The decline in the number of poor families receiving cash assistance from 1995 to 2005 reflects declines in both the number of eligible families and in eligible families' participation. The strong economy of the 1990s, TANF's focus on work, and other factors contributed to increased family incomes and a decline in the number of eligible families. However, most of the caseload decline – about 87 percent – resulted from fewer eligible families participating in the program, perhaps in response to TANF work requirements, time limits, and sanction and diversion policies.[21] [Emphasis added.]

More recently, Gene Falk of the Congressional Research Service reported the same result:

> The cash assistance caseload decline has been seen as one of the prime indicators that TANF made progress in achieving the goal of ending the dependence of needy families on government benefits. However, most of the caseload decline has resulted from a decline in the rate at which people eligible for assistance actually receive benefits, rather than a decline in the population in need. In 2015, 18.0 million people were eligible for TANF assistance, but 4.9 million (27%) received it.[22] [Emphasis added.]

Kaus' conclusion that ending AFDC had a "huge positive work force effect" is speculative and doubtful, as is his concern, that "Re-creating welfare might be expected to have a negative effect." As noted above, a child allowance is not the same as "re-creating welfare" and it would be adopted at a time when there are other programs that support work, most notably expansions in programs like Medicaid, the EITC, and SNAP, as well as the creation of new programs like the Children's Health Insurance Program and the Child Tax Credit.

@kausmickey (2/4/21): "If you think marginal tax rates are everything, maybe. But they're not. The key is whether you CAN get by without doing any work, and a lesson of welfare reform is that people get by on less than you'd think."

PC Response: Marginal tax rates are important, but their impact is an empirical question. Under AFDC, states faced a 100 percent effective rate after four months, but many states were granted waivers to lower that rate. A child allowance, however, would largely eliminate this as an issue for cash assistance, leaving families subject to tax rates from the phase out of various other programs and the imposition of taxes.

Kaus' suggestion that "people get by on less than you'd think" is callous and ignores the potential long-term benefits of cash income for families in deep poverty. The loss of a meaningful cash assistance program (TANF is virtually unavailable to needy families in many states) has forced many families to live on almost nothing, as depicted in the book, *$2.00 a Day: Living on Almost Nothing in America*, by Kathryn Edin and Luke Shaefer.[23] In many states, single parents with children may only qualify for SNAP, Medicaid, and various smaller child nutrition programs. Since Medicaid can't be used to pay for non-health basic needs, this leaves SNAP as the only meaningful program that is likely available – meaning they have to survive on assistance that amounts to roughly one-third of the poverty level. Even if they go to work and qualify for various tax credits, it may be over a year before they receive this income. Adding a child allowance would bring the total to about 60 percent of the poverty level. This is not a generous amount; even Ron Haskins, considered the architect of "welfare reform" has noted this shortcoming with respect to TANF and gone on record stating, "A great nation has to have a cash welfare program."[24]

@kausmickey (2/5/21): "Utah is famously soft on welfare (seriously)."

PC Response: This was a response to a tweet asking how Senator Romney could be elected in "conservative Utah." In 1996, the average monthly TANF caseload in Utah was 15,205 and the number of poor families with children in poverty was 25,670. By 2019, the number of TANF cases fell to 3,363, even as the number of poor families rose to 29,272.[25] As a result, the TANF-to-poverty ratio has declined from 59 in 1996 to just 11 in 2019. Under TANF, Utah has virtually eliminated cash assistance – not sure how that's being "soft on welfare." While this tweet has little bearing on the child allowance debate, it is yet another example of Kaus making assertions without providing any detail or citations.

@kausmickey (2/9/21): "My thinking was always that work is essential to achieving social equality – people rightly stigmatize those who live on dole and don't join labor force. The attempt to eliminate this stigma by putting EVERYONE on the dole is the oldest trick in the book – favorite of LBJ's HEW."

PC Response: Instead of stigmatizing those who need help, the goal of public policy should be to provide a safety net when needed and interventions designed to help individuals become self-sufficient. This was the goal of the AFDC waiver approach; TANF undid this by giving states a blank check with no accountability.

@kausmickey (2/9/21): "Stunned at how the best & brightest conservative minds have talked themselves into recreating the core of hated AFDC welfare system (giving no-strings cash to single mothers who don't work) – opposition to which fueled both Reagan's & Gingrich's rise."

PC Response: More stunning is how conservatives today regularly misstate facts, misrepresent research evidence, and advance misguided policies. Aside from misrepresenting the child allowance as recreating of AFDC, Kaus ignores the complete and total failure of TANF and its work requirements.

@kausmickey (2/12/21) quoting Senator Marco Rubio: "In 1988, then-Senator Biden expressed concern that the 'welfare system has broken down' because 'it only parcels out welfare checks and does nothing to help the poor find productive jobs.' That was then ..."

PC Response: It is important to distinguish AFDC before 1988 with AFDC after 1988. In particular, two changes around 1988 address the concerns laid out by then-Senator Biden.

First, on October 13, 1988, the Family Support Act of 1988 was signed into law. This act established the first real work requirements, establishing minimum participation rate standards for states and providing additional funding for employment, education, and training activities.

While many viewed these requirements as modest, the program was far more effective than TANF in engaging families in work activities. (Under TANF, states have relied on the caseload reduction credit and various loopholes – many have faced a 0 percent target for many years, i.e., no federal work requirement.) The act also extended Medicaid and child care coverage for 12 months for families leaving AFDC because of increased earnings or loss of the earnings disregards. And, it strengthened Child Support Enforcement programs.

Second, a new waiver-based approach to welfare reform started under President Reagan (and continued under President George H.W. Bush and President Clinton) that gave states considerable flexibility to experiment with changes to their AFDC programs. The waivers were subject to requirements for rigorous evaluation – typically random assignment – and cost neutrality (but not a fixed amount like a block grant). With a rigorous evaluation it was possible to determine whether families were "helped" under a particular reform plan. If it appeared the waiver policies pushed many families deeper into poverty, the waivers could be revoked or modified. When TANF was created, most states simply continued their waiver programs, but without any meaningful evaluation requirement.

Congress (and President Clinton) should have built on this framework in 1996. Instead, in creating TANF, they 1) replaced a safety net program with what is really a form of revenue sharing in many states; and 2) imposed a variety of dysfunctional requirements (especially work requirements) on the shrinking amount of funding used for basic assistance. Even the original drafters of the legislation consider TANF now to be a failure. Ron Haskins: "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."[26] Robert Rector: levied a similar criticism, stating: "States do not spend money on the purposes of welfare reform."[27] And, "Overall, the states have radically abused the program. Almost every state government has failed to carry out the principal objectives. Promoting work is the key idea of the act and they do virtually nothing – both red and blue states."[28]

Instead of worrying about what President Biden said in 1988, Kaus should study the implementation of the 1996 law and think harder about issues of causal inference. And, he should seek out the opinions of informed observers rather than relying on a politician with virtually no history in the welfare reform debates.

@kausmickey (2/12/21) quoting Senator Marco Rubio: "It took decades of bipartisan effort to reform our federal welfare programs so that they encouraged work instead of dependency. Now-President Biden's agenda seeks to remove or bypass requirements that were critical to helping those families out of poverty. It is not pro-family to provide cash payments without ensuring that at least one parent has a stable job or a path to getting one, because it makes the family reliant on those cash benefits."

PC Response: There have been two approaches to encouraging work – the expansion in programs designed to "make work pay" and work requirements. The former has encouraged work and provided income support; the latter has primarily pushed families off assistance.

The main goal of welfare-to-work programs should be to promote self-sufficiency, but TANF's work requirements have mainly been used as a tool of bureaucratic disentitlement. They are unreasonable for recipients, unrealistic for states, and are not based on evidence. Their main effect (along with the block grant structure) has been to push needy families off the rolls (or discourage them from coming on), as evidenced by the sharp drop in the take-up rate among eligible families. Since its inception, TANF has only engaged about 10 to 15 percent of those subject to work requirements in a work activity other than "unsubsidized employment" for enough hours to count in the rate.[29] Instead, states have relied on misguided provisions like the caseload reduction credit and/or a variety of "loopholes" to meet their work requirements.[30]

Gene Falk of the non-partisan Congressional Research Service observes:

> The 50% and 90% targets are aspirational, rather than evidence-based. They were not selected based on success rates of past programs in moving recipients from assistance to work. They call for higher participation rates than what evaluated pre-1996 programs achieved, including the most successful of those programs. Even so, the standard has mostly been met, though usually by means other than engaging recipients in activities. That is, states might be "hitting the target, but missing the point."[31]

The modest participation requirements under the AFDC-JOBS program did more to engage families in work activities than TANF ever has had. For more detail on how work requirements have failed, see: "Expanding Work Requirements in Non-Cash Welfare Programs: TANF is NOT a Model, but a Cautionary Tale," October 22, 2018, available at: https://petergermanis.com/wp-content/uploads/2021/02/TANF-No-Model.pdf.

@kausmickey (2/12/21): "Biden also said (in 1988) 'The current system is largely one of income support which has forced too many people into a cycle of dependence.' Today's Biden Dems (and hip DC GOP DoleWonks)—'Let's have a big program of income support going to non-workers'."

PC Response: While there were some families that experienced long-term dependency, the literature on the dynamics of welfare receipt suggests that most of those who used AFDC did so for a short period. Moreover, much of the data on the duration of welfare receipt comes from a period before the Family Support Act of 1988, before state experimentation with waivers, and before the massive expansion in make work pay programs. Given that the most significant increases in employment for single mothers occurred before the full implementation of welfare reform, it is highly speculative to suggest that long-term dependency would become a significant problem if a child allowance were enacted.

@kausmickey (2/14/21): "During the pandemic I'm all for sending out big cash checks to everyone -- $2,000 etc. Or more! But this is a child allowance program designed by Dems to be the template for a post-pandemic addition to welfare state. Without some work requirement it will replicate problems of AFDC."

PC Response: As noted above, a child allowance differs from AFDC in many respects; its biggest strength is that it goes a long way to repairing the failed TANF program. Kaus suggests that a "work requirement" might keep it from "replicating" the problems of AFDC. AFDC did have a work requirement as part of the JOBS program. This work requirement had more flexible and reasonable requirements than TANF and was far more successful in engaging low-income families in work activities. If Kaus had bothered to study the TANF experience, he would realize that conservatives have no aptitude for designing work requirements – at least not if the goal is to help families and give them a hand up.

Kaus seems to believe attaching a "work requirement" to the child allowance would be an improvement. As described above TANF is not a model. In thinking about how to craft a work requirement for a child allowance (or any program), policymakers would have to consider a variety of questions/options. The discussion that follows each question below is just a brief overview of some of the issues that should be considered in developing a work requirement for a child allowance. *If Kaus wants to advocate for work requirements, he should provide some policy details; thus far, conservatives have shown little interest in policy details.*

- *Who is subject to work requirements?* There are no formal exemptions in calculating TANF's work rate. However, because the calculation is limited to families with a "work-eligible individual," it is limited to adults and excludes from the definition of this term those receiving SSI/SSDI and parents caring for a disabled family member. TANF rules also allow states to "disregard" single parents with a child under one (up to 12 months per lifetime) and those subject to a work sanction in the most recent 3 months in the preceding 12-month period. States can establish their own exemptions beyond these exclusions, but anyone so exempted would still remain in the federal work rate. This means the calculation *includes* the elderly, those who are temporarily ill/incapacitated or are disabled but do not qualify for federal disability benefits, live in a remote area, are pregnant, and otherwise face barriers that might give them "good cause" for not participating. Indeed, many states recognize the importance of these factors and offer additional exemptions despite the negative impact doing so may have on their participation rate calculation.[32] If advocates of the "TANF model" believe TANF's work requirements are a success, would they maintain these narrow "exemptions" or modify them in some way for a child allowance? If so, how and on what basis?

- *What are the allowable work activities and are there limits on counting them?* TANF counts employment, job search and job readiness assistance, work experience/community service, vocational educational training, and various other activities. In addition, for purposes of counting hours of participation toward a state's work participation rate, there are a variety of limits on counting participation in certain activities or counting them at all (e.g., core vs. non-core hours, three separate limits on job search and job readiness assistance, the 12-month lifetime limit on counting vocational educational training, and the 30 percent cap on participants who can be in vocational educational training or teen parents in high school). Unfortunately, these limits are not based on a reasonable interpretation of the evidence about the effectiveness of work activities and tracking them can be administratively difficult. If advocates of the "TANF model" believe TANF's work requirements are a success, would they maintain the same activities and limits on what can count under a child allowance? Or would they establish a different set of activities and limits or set no limits?

- *How many hours are required to count in the work requirement?* For the overall work participation rate, TANF requires an average of 30 hours per week in a month, with 20 hours from "core" activities; single parents with a child under 6 have a 20-hour per week requirement (limited to core activities). Two-parent families also have a separate two-parent work requirement with higher hourly participation requirements (but, unlike for the overall rate, the hours of both parents can count). In most states, these requirements result in a 130-hour per month requirement in exchange for a benefit of about $200 to $400 – i.e., forcing individuals to value their time at about $2 to $3 an hour. As with the limits on counting hours of participation in various activities, there is no empirical basis to support TANF's minimum hourly standards and they have undoubtedly discouraged many eligible families from participating in the program. If advocates of the "TANF model" believe TANF's work requirements are a success (and reasonable), would they continue to apply them under a child allowance? If not, how many hours would they require?

- *What are the sanctions (for individuals) for non-compliance?* Sanction policies for work requirements typically have several components: the amount; the duration; good cause exceptions; and criteria for curing a sanction. Under TANF, states specify these conditions. Prior to TANF, states could receive waivers to *test* changes in sanction policies (and other welfare reforms), which would then be evaluated using a random assignment design. TANF eliminated the entitlement to assistance and the requirement that states evaluate their policy changes, even when they involve full-family (and even lifetime) sanctions. If advocates of the "TANF model" believe TANF's work requirements are a success, how would they design a sanction policy under a federally administered program like a child allowance? Would there be any provision to evaluate the effects of sanction policies, particularly if they involve terminating all or most of a family's benefits?

- *What are the minimum work participation rate targets?* TANF currently has a 50 percent work participation rate, which few states have actually had to meet. Rather, states have met TANF's work requirements by relying on the caseload reduction credit that lowered their target rate and taking advantage of unintended loopholes created by careless drafting of the legislation. If advocates of the "TANF model" believe TANF's work requirements are a success, would they adopt a participation rate structure like TANF's for a child allowance? If so, given the lack of engagement in real work activities (i.e., other than "unsubsidized employment") and the lack of an infrastructure to place large numbers of individuals in work activities, would they consider modifications, e.g., phasing in the requirements (generally or by subgroup), providing partial credit for participation that doesn't meet minimum hourly standards, and/or including a caseload reduction (hopefully not) or an employment credit? Or, would the requirement effectively apply to all non-exempt individuals?

- *What are the consequences work participation rate targets are not met?* If states fail to meet TANF's work participation rate targets, they face the prospect of a penalty that is a percentage of the block grant. States have several options to respond to a penalty before it is imposed (e.g., dispute the penalty, seek reasonable cause, or enter into a corrective compliance plan). The process can be complicated and time consuming and is generally not viewed as an effective mechanism for getting states to engage families in work activities. Most states that fail to meet the work requirements enter into a corrective compliance plan that waives (or reduces) the penalty if a state achieves compliance. Many states then resort to one of TANF's loopholes to satisfy the work requirement, rather than really engaging their caseloads. If advocates of the "TANF model" believe TANF's work requirements are a success, what would be the consequences if full participation were not achieved under a federally-administered child allowance?

- *How much funding would be provided to states to offset the costs of the new work requirements and related support costs?* Work programs entail a variety of costs (e.g., orientation, assessment, work activities, child care, other support services, and administrative expenses associated with dealing with non-compliance). How much funding would be provided? Would the added funding (if any) be sufficient to meet the demands associated with the participation requirements?

- *What is the role of evaluation?* There has been relatively little rigorous evaluation of welfare-to-work programs over the last 20 years. Given that there is little evidence regarding the effectiveness of TANF's work requirements, what kind of evaluation would be required if added as part of a child allowance? How much funding would be required for evaluation and who would monitor the evaluations?

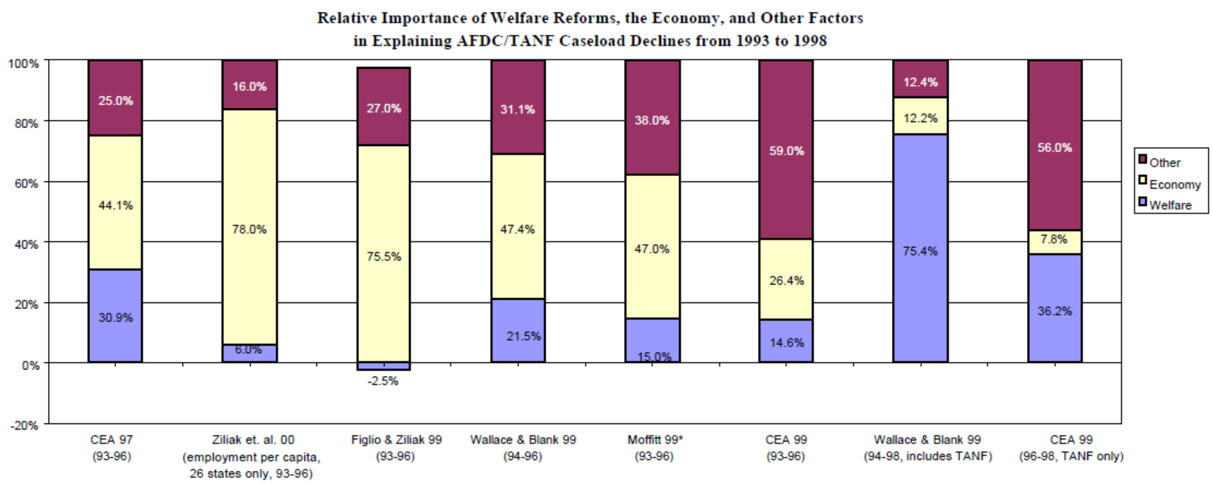
These are just some of the many questions that would have to be considered. If Kaus is serious about adding a work requirement to a child allowance, he should begin by providing some structure to such a proposal by engaging on these and other issues. And, he should think about the cost and feasibility of whatever he proposes, something not considered in any of the proposals conservatives have advanced over the last 25 years.

@kausmickey (2/15/21) citing Robert Rector and Marie Fishpaw of The Heritage Foundation: "The 1990s welfare reform dramatically reduced dependence and increased employment, causing an unprecedented drop in child poverty ... Nevertheless, the [Left] has never accepted this reform and has sought to reverse it ever since."

PC Response: Robert Rector is not a serious source for a credible assessment of the impact of welfare reform. He rejects rigorous evaluations in favor of simplistic data comparisons and weak studies. For example, at a conference about implementing work requirements/programs for SNAP pilot projects, Rector said the following:

> When we designed the TANF law, I took all of the controlled random assignment studies and put them in the circular file. I also used all of Jason's caseload data, and other quasiexperimental data from all over the country that I had been collecting since the 1970s, because I knew those effects were there. Random assignment studies said there would be a 5 percent reduction in caseload over five years. We had a 60 percent reduction in just a few years, all of which the informal data told us that sort of thing would happen and the random assignment studies did not.[33]

Here, Rector seems to give full credit to the caseload decline to TANF, ignoring the many other factors that help explain the employment, poverty, and caseload impacts. A number of researchers have used statistical modeling in an attempt to isolate the effect of welfare reform on caseloads from other factors. Stephen Bell of the Urban Institute summarized the findings from eight research studies on the relative importance of welfare reform, the economy, and other factors. [34] The findings are somewhat uncertain and even inconsistent due to different methods, data sets, time periods, and other differences. The important point, however, is that they recognize that other factors, most notably the economy, have an important impact on welfare caseloads (see figure below). Using a rough average across the studies, "welfare reform" explains about 15 to 30 percent of the decline in the caseload, while the economy explains about 30 to 40 percent, and other factors (most notably the increase in the aid to the working poor) explain the remainder.



Like the econometric studies, most of the random assignment evaluations of "welfare reform" or mandatory work programs were implemented under AFDC and the early years of TANF. TANF is a much harsher program than AFDC in several respects, e.g., eliminating the entitlement, with stricter sanction and time limit policies. So, looking solely at the TANF period and with more years of data, *the share of the 60 percent caseload decline* attributable to TANF would be larger. But, as noted above by GAO and CRS, most of the decline was not due to greater employment or less poverty, but fewer eligible families receiving benefits.

@kausmickey (2/15/21) citing Robert Rector and Marie Fishpaw of The Heritage Foundation: "Its goal has been to weaken or eliminate welfare work requirements and to maintain or restore welfare aid to non-working persons and families. If enacted as permanent policy, the Biden child cash grants would largely accomplish that reversal."

PC Response: TANF's work requirements are about pushing people off the rolls, so "restoring" welfare aid is a reasonable response. If Rector, Kaus, and others want work requirements, they should draft legislation that builds on evidence and is designed to help families.

@kausmickey (2/15/21): "In other words the percent working jumped 17 points--from roughly 43% to 60%--from 1993 to 2002 for this group, a startling increase, and welfare reform (as opposed to, eg, the economy) accounted for more than half of that. According to this study, anyway: https://econpapers.repec.org/article/binbpeajo/v_3a35_3ay_3a2004_3ai_3a2004-1_3ap_3a1-116.htm."

PC Response: Here Kaus cherry picks the time period and the study to produce a result he believes supports his contention. The welfare reform experience from 1993 to 1997 is AFDC-JOBS with waivers, not TANF. So, to credit "welfare reform"/TANF, the analysis should start with 1997. Even then, sorting out impacts is a challenge in an econometric study, because TANF's provisions are difficult to model. For more detail, see: "Is Relying on an Econometric Study to Promote 'Policies Similar to Welfare Reform' a Basis for Evidence-Based Policymaking?," October 6, 2019, available at: https://petergermanis.com/wp-content/uploads/2021/02/Econometric.pdf.

@kausmickey (2/15/21): "And @mattyglesias sneers at 'The right's evidence-free work argument' against the no-strings child allowance plans. (https://slowboring.com/p/mitt-romneys-child-allowance-plan) Huh? This seems like evidence! When we got rid of the earlier no-strings AFDC cash dole plan, work soared."

PC Response: Simplistic pre-post comparisons are not credible evidence of causal impacts.

@kausmickey (2/17/21): "This is wildly unconvincing. The worry isn't a tide of poor people having 5 kids. The main worry is (as @swinshi suggests) single moms with 1 or 2 kids going from working full or part time to not working at all, with their families dropping out of the work culture."

PC Response: @swinshi hasn't presented a credible estimate of the labor supply effects of a child allowance. Why not rely on the NAS estimates? If you think they are biased in some way, explain why.

@kausmickey (2/20/21): https://www.pewresearch.org/fact-tank/2020/11/30/prior-to-covid-19-child-poverty-rates-had-reached-record-lows-in-u-s/

PC Response: The tweet was in response to the following tweet Kaus received: "You talk like this hasn't been the status quo for thirty years. Many of your ideal policies have been in place and they've led to none of the outcomes you suggested they would, in fact most of the things you're saying are possible bad outcomes of welfare have only gotten worse."

Kaus' response is a link to an article with the heading, "Prior to COVID-19, child poverty rates had reached record lows in U.S." Presumably, he is suggesting that welfare reform was a success because the overall poverty rate reached a record low. This simplistic "answer" misses important distributional effects. A strong economy and make work pay policies have done much to reduce the poverty rate overall, but TANF has pushed millions of families deeper into poverty, something a focus on the poverty *rate* is likely to miss. Policy should be designed to help all poor families.

* * *

Conclusion

This response isn't intended to be a commentary of any of the current child allowance proposals. If it were, I would raise concerns about the cost and the targeting. But, all of the child allowance proposals address an important need – the shredding of the cash assistance safety net that is a direct result of the 1996 welfare reform law. Kaus has repeatedly ignored this problem and indeed still considers TANF and its work requirements a success. In doing so, he continues to present a grossly misleading picture of the effects of the 1996 law and speculates wildly about the potential effects of a child allowance on the poorest families. Instead of tweeting simplistic conservative talking points, his time would be better spent studying the implementation of the 1996 welfare reform law and thinking harder about the kind of evidence needed to make cause-and-effect statements.

[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.

[2] Robert Rector, "Obama Ends Welfare Reform As We Know It," The Heritage Foundation, July 12, 2012, available at: https://www.heritage.org/welfare/commentary/obama-ends-welfare-reform-we-know-it; and Robert Rector, "How Obama has Gutted Welfare Reform," *The Washington Post*, September 6, 2012, available at: https://www.washingtonpost.com/opinions/how-obama-has-gutted-welfore-reform/2012/09/06/885b0092-f835-11e1-8b93-c4f4ab1c8d13_story.html.

[3] Douglas J. Besharov and Peter Germanis, "Toughening TANF," American Enterprise Institute, April 21, 2004, available at: https://www.aei.org/publication/toughening-tanf and Douglas J. Besharov and Peter Germanis, "Toughening TANF: How Much? And How Attainable?," March 23, 2004, available at: http://www.welfareacademy.org/pubs/welfare/toughening_tanf.pdf.

[4] The description of this provision is vastly oversimplified. For example, a state may have two credits, one for the overall rate and one for the two-parent rate. The state may choose to apply the overall credit to the two-parent rate. In addition, caseload reductions due to federal or state policy changes since the base year do not count in determining the caseload decline and hence the size of the credit.

[5] U.S. Government Accountability Office, *Temporary Assistance for Needy Families: State Maintenance of Effort Requirements and Trends* (Washington, DC: GAO, May 17, 2012, p. 15, available at: http://www.gao.gov/assets/600/590958.pdf.

[6] U.S. Government Accountability Office, *Temporary Assistance for Needy Families: State Maintenance of Effort Requirements and Trends* (Washington, DC: GAO, May 17, 2012, p. 15, available at: http://www.gao.gov/assets/600/590958.pdf.

[7] Center for Public Policy Priorities, "A New Welfare-to-Work Approach for Texas," February 2007, available at: http://www.workingpoorfamilies.org/pdfs/TANF_reform_80th.pdf.

[8] Liz Schott and Sharon Parrott, "Designing Solely State-Funded Programs: Implementation Guide for One 'Win-Win" Solution for Families and States," Center on Budget and Policy Priorities, January 8, 2009, p. 5, available at: http://www.cbpp.org//sites/default/files/atoms/files/12-7-06tanf.pdf. An earlier version of this paper was published on July 16, 2007, and even this appears to be an update of an earlier paper, well before the final rule implementing the DRA was published.

[9] LaDonna Pavetti, Linda Rosenberg, and Michelle K. Derr, Understanding Temporary Assistance for Needy Families Caseloads After Passage of the Deficit Reduction Act of 2005 (Washington, DC: Mathematica, September 21, 2009), pp. 7-8, available at: http://www.mathematica-mpr.com/~/media/publications/PDFs/family_support/TANF_caseloads.pdf.

[10] There is no single source for information about solely state funded programs, as they are not subject to TANF data reporting requirements; this conclusion is based on my own informal search about such programs and the numbers of families in them.

[11] Ohio failed the overall work rate in FY 2010 and FY 2011 and the two-parent rate in FY 2012.

[12] See: John Kasich, Executive Order 2011-19K, http://www.governor.ohio.gov/Portals/0/pdf/executiveOrders/2011-19K.pdf.

[13] Thomas A. Celmar and Justin Pinsker, *Legislative Service Commission: Analysis of the Executive Budget Proposal*, February 2013, p. 18, available at: http://www.lsc.state.oh.us/fiscal/redbooks130/jfs.pdf.

[14] The state met the overall work rate for 2012, but failed to meet the two-parent work rate, despite the use of this gimmick. See HHS table 1A at: http://www.acf.hhs.gov/sites/default/files/ofa/wpr2012_final.pdf.

[15] Gene Falk, "Temporary Assistance for Needy Families (TANF): The Work Participation Standard and Engagement in Welfare-to-Work Activities," Congressional Research Service, February 1, 2017, p. 10, available at: https://www.everycrsreport.com/files/20170201_R44751_b7093fe9349fcb8c25170eca4d9725d907ad535e.pdf.

[16] Matt Weidinger, "'Child allowances' revive welfare as we knew it," February 5, 2021, available at: https://www.aei.org/poverty-studies/child-allowances-revive-welfare-as-we-knew-it/ https://www.aei.org/poverty-studies/child-allowances-revive-welfare-as-we-knew-it/.

[17] Committee on Building an Agenda to Reduce the Number of Children in Poverty by Half in 10 Years, *A Roadmap to Reducing Child Poverty* (Washington, D.C.: National Academies Press, 2019), available at: https://www.nap.edu/catalog/25246/a-roadmap-to-reducing-child-poverty.

[18] Hilary Hoynes and Diane Schanzenbach, "Safety Net Investments in Children," April 10, 2018, p. 4, available at: https://gspp.berkeley.edu/assets/uploads/research/pdf/bpea_HoynesSchanzenbach_040918.pdf.

[19] Irwin Garfinkel, Laurel Sariscsany, Elizabeth Ananat, Sophie Collyer, and Christopher Wimer, *The Costs and Benefits of a Child Allowance*, February 18, 2021, available at: https://static1.squarespace.com/static/5743308460b5e922a25a6dc7/t/602ec9c7ddddd01cd29430e1/1613679049611/Child-Allowance-CBA-brief-CPSP-2021.pdf.

[20] Kevin Drum, "Did Welfare Reform 'Work'? Maybe Not, But Something Did," February 19, 2021, available at: https://jabberwocking.com/

[21] U.S. Government Accountability Office, *Temporary Assistance for Needy Famlies: Fewer Eligible Families Have Received Cash Assistance Since the 1990s, and the Recession's Impact on Caseloads Varies by State* (Washington, D.C.: GAO, February 2010), available at: https://www.gao.gov/new.items/d10164.pdf.

[22] Gene Falk, "Temporary Assistance for Needy Families," Congressional Research Service, March 27, 2018.

[23] Kathryn J. Edin and H. Luke Shaeffer, *$2.00 a Day: Living on Almost Nothing in America* (New York, NY: First Mariner Books, 2016).

[24] American Enterprise Institute Forum on 1996 Welfare Law, August 22, 2016, available at: : https://www.c-span.org/video/?414208-3/american-enterprise-institute-forum-1996-welfare-law-congressional-panel&start=1506.

[25] See Laura Meyer and Ife Floyd, "Cash Assistance Should Reach Millions More Families to Lessen Hardship," Center on Budget and Policy Priorities, November 30, 2020, available at: https://www.cbpp.org/research/family-income-support/cash-assistance-should-reach-millions-more-families-to-lessen#:~:text=In%202019%2C%20for%20every%20100,from%2068%20families%20in%201996.&text=This%20%E2%80%9CTANF%2Dto%2Dpoverty,lowest%20in%20the%20program's%20history.

[26] Ron Haskins, "TANF at Age 20: Work Still Works," *Journal of Policy Analysis and Management*, Winter 2015, available at: https://onlinelibrary.wiley.com/doi/abs/10.1002/pam.21878.

[27] Teresa Wiltz, "States Hold Onto Federal Dollars Meant for Needy Families," *Stateline*, November 12, 2019, available at: https://www.pewtrusts.org/en/research-and-analysis/blogs/stateline/2019/11/12/states-hold-onto-federal-dollars-meant-for-needy-families.

[28] Jenni Bergal, "States Raid Fund Meant for Needy Families to Pay for Other Programs," July 24, 2020, available at: https://www.pewtrusts.org/en/research-and-analysis/blogs/stateline/2020/07/24/states-raid-fund-meant-for-needy-families-to-pay-for-other-programs.

[29] Douglas J. Besharov and Peter Germanis, "Toughening TANF: How Much? And How Attainable?," March 23, 2004, available at: http://www.welfareacademy.org/pubs/welfare/toughening_tanf.pdf; and Gene Falk, "Temporary Assistance for Needy Families: Work Requirements," Congressional Research Service, March 27, 2018.

[30] Peter Germanis, "The Failure of TANF Work Requirements: A *Much Needed* Tutorial for the Heritage Foundation and the American Enterprise Institute," August 7, 2016, available at: https://petergermanis.com/wp-content/uploads/2021/02/The-Failure-of-TANF-Work-Requirements.pdf.

[31] Gene Falk, "Temporary Assistance for Needy Families," Congressional Research Service, March 27, 2018.

[32] Linda Giannarelli, Christine Heffernan, Sarah Minton, Megan Thompson, and Kathryn Stevens, *Welfare Rules Databook: State TANF Policies as of July 2016*, The Urban Institute, October 2017, Table III.B.1, available at: https://wrd.urban.org/wrd/data/databooks/2016%20Welfare%20Rules%20Databook%20(Final%20Revised%2001%2016%2018).pdf.

[33] University of Maryland School of Public Policy and Seretaries' Innovation Group, "Implementing the SNAP Pilot Projects to Reduce Dependency and Increase Work Levels," April 10, 2014, p. 35, available at: http://www.welfareacademy.org/pubs/foodassist/slides/SNAP_Pilots_Conference_Transcript.pdf. Note: The transcript erroneously identifies Robert Doar as making this statement.

[34] Stephen H. Bell, *Why are Welfare Caseloads Falling* (Washington, DC: The Urban Institute, March 2001), http://www.urban.org/uploadedPDF/discussion01-02.pdf.