

Claims about Work and Work Requirements: Keeping an Eye on AEI

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The American Enterprise Institute (AEI) is a major source of misinformation about work requirements. Their reports often distort the empirical record, largely ignore policy details and implementation issues, and often advance untested and misguided proposals to expand work requirements in existing programs or to extend them to new programs.

As part of legislation to extend the debt limit, House Republicans are proposing to apply work requirements to more benefit recipients in the Temporary Assistance for Needy Families (TANF) program, the Supplemental Nutrition Assistance Program (SNAP) and Medicaid. Matt Weidinger and Angela Rachidi of AEI recently posted a two-part series about these proposals – “Questions and Answers About Work Requirements Provisions in the House Republican Debt Limit Proposal.” Part I focuses on the rationale for work requirements and provides a brief description of the proposed changes.² The discussion is general and not particularly controversial, so this response does not address this part (except for a paragraph about TANF and closing loopholes). This response focuses on Part II of their Q&A series, which summarizes some of the existing research on work requirements, speculates about the expected impacts of proposals to expand work requirements, and cites public opinion data to support the proposed work requirement policies.³

This response highlights many of the statements made by Weidinger and Rachidi that suggest that work requirements under TANF and for SNAP ABAWDs (able-bodied adults without dependents) have been a success and that the empirical record suggests that the reach of work requirements should be expanded. Each statement is followed by a “PC Response” – where “PC” is short for “Peter the Citizen.” (Note: My response often references citations in the Weidinger/Rachidi paper; these are not highlighted in hyperlinks in my text below, but citations are included as endnotes in this response.)

Why is requiring work good for low-income adults?

Weidinger and Rachidi: “Higher labor-force participation translates to less poverty, and employment correlates to many other nonfinancial benefits, such as better physical and mental health. Encouraging work among benefit recipients gives them an opportunity to escape poverty and achieve upward mobility without depending on government assistance.”

PC Response: To support the claim that “more work leads to less poverty,” Weidinger and Rachidi cite a recent study by Child Trends.⁴ This is hardly a surprising conclusion. The real

question is, do work requirements lead to more work? Notably, Weidinger and Rachidi leave out the following statement from that same report:

We did see an increase in single mothers' labor force participation in the 1990s. Yet, evidence from early-1990s welfare-to-work experiments and more recent research consistently indicate that, while work requirements can boost short-term employment and earnings, they do not have their intended effect of getting people into stable jobs that sustainably lift them out of poverty with their incomes. For example, previous research found that welfare reform accounted for only a small amount of the increase in single mothers' employment rates in the mid-1990s.⁵

While more work can reduce poverty, the main effect of work requirements today is caseload reduction and a reduction in income. Scott Winship, an AEI colleague, writing about the child allowance and its potential negative effects on employment and poverty, says: "Republicans are right to worry about unintended consequences."⁶ For those who believe that work requirements should be designed to provide a hand-up, one of these unintended consequences would be the sharp decline in the TANF take-up rate among eligible families (calculated by the Urban Institute using the TRIM microsimulation model), from 79 percent in 1996 to 21 percent in 2019.⁷ If TANF and its work requirements were a success, one would expect that the sharp decline in the caseload would be accompanied by a similar decline in eligible families. That didn't happen. While some conservatives may not see this as an unintended effect, the loss of cash income for the poorest families and the potential negative consequences for children should be. In short, Weidinger and Rachidi celebrate a relatively small increase in employment (relative to the caseload decline), but ignore the fact that far more families are made worse off with detrimental consequences for children. Where is the "worry about unintended consequences"? (More on this below.)

Weidinger and Rachidi: "Research has shown that work requirements can increase employment levels, which benefits individuals and families. For example, research on TANF shows that work requirements increased employment levels on average, although the verdict is still out when it comes to examining work requirements in SNAP and Medicaid, mainly due to data limitations."

PC Response: AEI "scholars" in the poverty space have a history of cherry-picking studies, misinterpreting findings, and even relying on junk science – all to fit their priors. What follows is an assessment of their claims for each of these programs.

TANF. To support the claim that TANF work requirements increased employment, Weidinger and Rachidi rely on two primary sources, neither of which is appropriate for making claims about the TANF program or used to justify major changes to work requirements in other programs.

One source is a report from MDRC, the firm that evaluated a number of welfare-to-work programs in the 1990s – *How Effective Are Different Welfare-to-Work Approaches? Five-Year Adult and Child Impacts for Eleven Programs*.⁸ The programs evaluated began under AFDC and were very different than the kinds of programs states would have to operate to meet the standards

required to count toward TANF's work participation rate. In particular, the programs didn't have TANF's 30-hour per week minimum hourly standard or its strict limits on counting education and training activities (focusing instead on a rigid work-first approach), and the target populations were somewhat different, with TANF eliminating most exemptions. They also didn't operate under a block grant structure, eliminate the entitlement to assistance, involve full-family sanctions (as many state TANF programs do), or operate under other TANF rules, like the federal or state time limits. None of these early programs came close to meeting TANF's work participation standards. As Gordon Berlin, past president of MDRC, the firm which conducted these evaluations, once observed:

None of the welfare-to-work programs evaluated by MDRC to date – even the most effective ones – would have met the standards currently in place (that is, had states received no credit for caseload reductions), primarily because too few people participated in them for at least the minimum number of hours per week.⁹

In short, the results of the MDRC evaluations are not remotely generalizable to TANF's work requirements. Moreover, the results suggested small to modest impacts on employment that faded out over time and showed little impact on “measured income” and poverty status.

A second source is a recent study by Justin Falk of the Congressional Budget Office (CBO) – *The Effects of Work Requirements on the Employment and Income of TANF Participants*.¹⁰ Falk examined changes to Alabama's TANF policy that extended the work requirement to parents of children ages 6 to 11 months, which previously had covered only parents of children 12 months or older. He found that the work requirement increased the employment rate by 11 percentage points (29 percent). Unlike the MDRC studies reviewed above, the CBO study was not a randomized control trial, but a quasi-experimental study. Moreover, the “treatment group” was limited to a very small subset of the population – single mothers with a children 6 to 11 months old – and it was based on data in a single state long after TANF was enacted. In particular, Alabama is a state with a very low benefit, but also with a generous earnings disregard, one that allows parents to work for a year without having their benefits reduced. The study was based on data collected in 2018, after a decline in the caseload of about 80 percent since 1996. As a result, the findings should not be used to make generalizations about the impact of the TANF program as a whole (even in Alabama). Last, the follow-up period was limited to just one year and did not include a period after which the generous earnings disregard no longer applied.

Side Note: Scott Winship, an AEI colleague, tweeted the following after reading the CBO study: “Welfare reform may have reduced poverty more than the counterfactual world where we still have AFDC.” This is even more irresponsible than the Weidinger and Rachidi claims. Aside from the fact that he ignores all the foregoing caveats, it is important to note that the CBO paper made no claims about poverty. In addition, welfare reform is much more than work requirements.

Weidinger and Rachidi point to what they believe are positive employment effects, “which benefits families and individuals.” While TANF and its work requirements may have induced some additional employment, any such gains would pale compare to caseload declines. If TANF were successful in promoting employment, one would expect the number of families eligible to

receive benefits (the take-up rate) to decline in tandem with the caseload itself. That's not what happened, as noted in the statistics cited above.

Consider also the following statements from the U.S. Government Accountability Office (GAO) and the Congressional Research Service that support this conclusion. 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.¹¹ [Emphasis added.]

More recently, Gene Falk of the Congressional Research Service reached the same conclusion:

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.¹² [Emphasis added.]

The loss of cash aid can have serious consequences, as LaDonna Pavetti and her colleagues at the Center on Budget and Policy Priorities observe:

When families don't have access to cash assistance to pay their rent and utilities, to purchase personal hygiene and household cleaning supplies, and to buy diapers and clothing for their children, hardship increases with dire results, including increased involvement in the child welfare system, homelessness, higher incidences of mental health issues, and costly health problems.

These negative outcomes extract a significant toll on children. Children can experience toxic stress: chronic, high levels of stress that over time significantly impact physical and mental health. Children who experience significant adversity are at increased risk of life-altering conditions, including heart disease, diabetes, depression, arthritis, gastrointestinal disorders, autoimmune diseases, multiple types of cancer, and dementia, as well as an increased risk of untimely death. In addition to the harm this causes children and their parents, the long-term costs to government are significant as these issues are all more costly to address than providing families with cash assistance to meet their basic needs.¹³

A full assessment of TANF's possible effects on employment and other outcomes is beyond the scope of this response, but a more careful assessment should lead one to conclude that TANF and its work requirements are a cautionary tale, not the model Weidinger and Rachidi seem to believe it is.

SNAP. Weidinger and Rachidi argue that “the verdict is still out when it comes to examining work requirements in SNAP and Medicaid, mainly due to data limitations.” The evidence to support this “verdict is out” claim for SNAP is a citation to a paper by Rachidi herself.¹⁴ In this paper, she cites two studies that find a positive effect on employment and three studies that find “no positive effects on employment.” A more careful assessment, however, suggests that the existing evidence is not mixed but it overwhelmingly shows little to no effect on work, but large negative caseload effects, suggesting adverse effects on poverty and other outcomes.

What follows is a brief summary of the main findings taken directly from the five studies Rachidi cited, plus one new one.

Citing positive employment effects. The first citation for positive employment effects is a paper by Timothy Harris of Illinois State University. He writes:

I find that work requirements significantly decreased SNAP participation and marginally increased employment for ABAWD using Difference-in-Difference-in-Differences estimation. ...Taken literally, the estimated percent changes from the restricted samples (see Table 6) imply that for every five individuals who stop receiving SNAP because of the work requirement there is only one individual that becomes employed (9.8 percent decrease in SNAP and a 2.0 percent increase in employment). It is important to note that some of the increase in employment could come from individuals that met work requirements but still qualified for SNAP benefits.¹⁵

In other words, the employment impact is positive, but “marginal” whereas the loss in SNAP receipt is “significant” – at least five times as large.

The second citation is to an article by Kye Lippold of the Office of Tax Analysis (U.S. Treasury) and Remy Levin of the University of Connecticut.

The results of this research suggest that SNAP benefits for childless adults provide important spillover effects. When work requirements are just waived at an unemployment cutoff, SNAP participation rises by about 1%, and property crime and homelessness fall by about 0.1%. The program does have negative impacts on labor supply, so the relative weight of these factors should be considered when evaluating social welfare gains from the program.¹⁶

Again, hardly a stunning endorsement of work requirements, particularly once someone considers outcomes other than employment.

Citing no employment effects. Jeehoon Han of Zhejiang University:

These findings indicate that the SNAP work requirement may not achieve the intended goal of promoting employment; instead it may increase the risk of disadvantaged individuals failing to receive the assistance they need.¹⁷

Colin Gray and colleagues writing for the National Bureau of Economic Research:

There is a 53 percent overall reduction in program participation among adults who are subject to work requirements. Homeless adults are disproportionately screened out. We find no effects on employment, and suggestive evidence of increased earnings in some specifications.¹⁸

A report from the Urban Institute:

...we find no evidence that application of the ABAWD time limit substantially increases employment as measured for a cohort of people who were participating in SNAP shortly before time limit reinstatement. Our primary analysis finds small statistically significant negative impacts of the ABAWD time limit on employment.¹⁹

Not cited. Tracy Vericker and her colleagues of Westat and the Urban Institute just released another paper that finds no employment impact:

Time limit reinstatement reduced SNAP participation by 7 to 32 percentage points in the 12th month of time limit reinstatement but did not generate evidence of improved employment or annual earnings (1 year after time limit reinstatement, employment decreased by 2 to 7 percentage points and annual earnings decreased by \$247 to \$1,230). ...The ABAWD time limit reduced SNAP participation but did not improve employment and earnings. SNAP may provide helpful support to participants as they seek to enter or re-enter employment, and removing this support may be detrimental to their employment prospects.²⁰

In short, the evidence for the SNAP ABAWDs requirement is pretty conclusive – if work is the main objective, it does not appear to be effective in achieving that goal. One could argue that the existing evidence isn't from randomized control trials and more research is needed. Indeed, Congress should have built in an evaluation of SNAP's ABAWD work requirement in 1996 or even today. However, several of the studies cited by Rachidi use a Regression Discontinuity Design (RDD) with age 50 as the cutoff point. This is a strong method for assessing the impact of the proposed policy change in the debt limit bill, raising the upper age limit from 49 to 55. These studies suggest the proposed age change would not have the impact Weidinger and Rachidi believe it would have.

Medicaid. For the verdict still being out on Medicaid, Weidinger and Rachidi cite a fundamentally flawed report from the Buckeye Institute claiming that Medicaid work requirements would significantly increase beneficiaries' work hours and lifetime earnings:

Increase lifetime earnings by \$212,694 for women and \$323,539 for men—even assuming that the individual remains on Medicaid for their entire working life.

The authors go even further:

We also find that the financial prospects look even brighter for individuals who transition off of Medicaid; they may earn close to \$1 million more over the course of their working years.²¹

The magnitude of these findings has no precedent in the literature on work requirements and basically reflects figures the authors made up based on a variety of unsupported assumptions. As Matt Broaddus of the Center on Budget and Policy Priorities explains in a detailed critique, the report “is based on flawed assumptions, misrepresents existing research, and ignores actual experience regarding Medicaid and work from states like Arkansas, Michigan, and Ohio.”²² The Buckeye Institute’s report can be regarded as nothing other than “junk science.” No serious “scholar” would consider this report to provide credible evidence. (AEI “scholars” have also on several occasions invoked the junk science produced by the Foundation for Government Accountability – presumably because it fits their priors.”²³)

It is unclear why Weidinger and Rachidi would choose to cite this report as suggesting the “verdict is out,” as it would suggest that Medicaid work requirements would be wildly successful. Meanwhile, they ignore findings from more relevant research that suggests very different impacts. In particular, they could have cited a study in the *New England Journal of Medicine* that reported the following findings:

Using a timely survey involving low-income adults in Arkansas and three comparison states, we found that implementation of the first-ever work requirements in Medicaid in 2018 was associated with significant losses in health insurance coverage in the initial 6 months of the policy but no significant change in employment. Lack of awareness and confusion about the reporting requirements were common, which may explain why thousands of persons lost coverage even though more than 95% of the target population appeared to meet the requirements or qualify for an exemption.²⁴

While this study does not provide definitive evidence of the possible effects of a Medicaid work requirement, it does suggest caution. At best, an argument could be made for random assignment experiments to test the impact of such a requirement on employment, and importantly, on a range of other outcomes, such health insurance coverage and health status, before mandating or giving states the option to implement such requirements statewide. Even this would be premature – a first step would be to reform the existing TANF and SNAP work requirements so that they do more to help families find employment without the negative effects the current requirements have.

In fairness, Angela Rachidi did cite *The New England Journal of Medicine* study in a separate paper stating:

Additionally, only one study to my knowledge attempted to assess the effects of Medicaid work requirements on employment, but challenges associated with implementing the policy and studying its effects make those results difficult to interpret.²⁵

This is a fair assessment, though even identifying the implementation challenges is a reason to proceed with caution. It also raises the question of why in a Q&A about pending legislation

would Weidinger and Rachidi cite the fundamentally flawed Buckeye Institute report instead of a more reputable source?

Weidinger and Rachidi: “However, TANF’s impact on employment and the overall well-being among single-mother families suggests that the same positive effects could result from taking a similar approach in SNAP and Medicaid.”

PC Response: Leaving aside the problem with the claim that TANF had positive effects, it is irresponsible to generalize from one program to other programs with different funding and programmatic structures, target populations, and that differ with respect to the details of work requirements themselves. Moreover, the most credible studies conducted about work requirements for SNAP and Medicaid, while not randomized control trials, suggest little to no impact on employment and sharp declines in benefit receipt and thus a decline in “overall well-being.”

No one serious about evidence-based policymaking would recommend large, nationwide policy changes based on the existing evidence base. A more responsible solution would be to recommend smaller-scale experiments (i.e., randomized control trials) to build an evidence base. This was the policy under the AFDC program when states were granted waivers to test policy changes subject to a requirement for a rigorous evaluation. The 1996 welfare reform that Weidinger and Rachidi are so enamored with replaced this model with TANF – a blank check to states with little accountability and no evaluation requirements. With respect to SNAP, Congress could easily have built in an evaluation requirement to test the impact of the ABAWDs work requirement and could still do so, but for conservatives proposing tougher work requirements, it is ideology over evidence (again).

What are the expected impacts on low-income adults?

Weidinger and Rachidi: “The proposed SNAP changes would expect slightly more able-bodied adults without dependents (that is, those ages 50 through 55) to work or prepare for work in exchange for SNAP benefits. The Medicaid policies in the proposal would reinforce this with an expectation of at least community service by able-bodied adults under age 56 who are without dependents and collecting only Medicaid benefits (and thus not otherwise covered by the SNAP policy). When similar policies were included in the 1996 welfare reforms, work and earnings by individuals in affected groups (including those at risk of going on benefits) rose while dependence on benefits and poverty declined.”

PC Response: Weidinger and Rachidi do not explain what they mean by “similar policies were included in the 1996 reform.”

With respect to SNAP and the proposal to extend the upper age limit for the ABAWDs requirement to ages 50 through 55 there is strong evidence that there would be little to no impact on work. Several of the studies employ a RDD design using age 50 as the cutoff point. This approach has strong internal validity when comparing those just below 50 (and subject to the requirement) to those just above 50 (and thus can serve as a control group). Rachidi herself cited three such studies (Gray et. al., Han, and Harris) and two indicated no employment effect and all

three suggested large caseload effects. (As noted above, the Harris study found that the negative caseload impact was far greater than the relatively small positive employment impact.) The main limitation of RDDs is their generalizability to the whole program, as the effects may be different for younger age groups. Nevertheless, the best evidence to date suggests that the proposed expansion in the age group subject to SNAP's ABAWDs requirement is not warranted, unless the only objective is to save program dollars.

There were no "similar policies" for the Medicaid work requirement, unless Weidinger and Rachidi mean the SNAP ABAWDs requirement. But, as noted above, there is no research that supports claims that work and earnings rose to any meaningful extent and while poverty was not an explicit outcome measure in the studies cited above, it almost surely worsened given the large caseload effects. Moreover, there are likely to be differences in the target population due to differences in eligibility rules, so the results from SNAP should not be generalized to Medicaid. There is also reason to think the impacts would be different based on the nature of the benefit, as Robert Rector of The Heritage Foundation and an ardent supporter of work requirements for TANF and SNAP explained in an article, "Work Requirements in Medicaid Won't Work. Here's a Serious Alternative":

...work requirements for medical services would be almost impossible to administer and enforce. Making cash assistance or food stamps contingent on work participation is one issue, denying medical care to sick, poor people is another matter. If enacted, "work requirements" in Medicaid would certainly be symbolic rather than substantial.

In reality, it is difficult to get eligible able-bodied adults without dependent children to enroll in Medicaid. After all, they do not need to enroll in the program to receive free medical care. They know that if they get sick and walk into a clinic or emergency room they will get enrolled in Medicaid prospectively or receive treatment pro bono.

A work requirement would just make it less likely for able-bodied adults without dependent children, known as ABAWDs, to register for the program. The work requirement would reduce Medicaid enrollments, but Medicaid costs might well go up because the eligible ABAWDs would go to the emergency room rather than receive routine care elsewhere.²⁶

How would this affect spending on benefits?

Weidinger and Rachidi: "Details are pending, but more work and greater earnings among participants will reduce or in some cases eliminate some recipients' eligibility for benefits, with the result being smaller caseloads and less dependence. Experience with TANF suggests that other current recipients who are working under the table or who fail to comply with work requirements may also lose eligibility for benefits."

PC Response: More work would result in "smaller caseloads and less dependence," but the available evidence suggests that the main impact would be from fewer eligible families receiving assistance (see GAO, CRS, and Urban Institute data on take-up rates above), due in part to the unreasonableness of work requirements that effectively push families off the rolls. Weidinger

and Rachidi make not attempt to disentangle the savings due to more work vs. those due to noncompliance or the decline in participation among eligible families due to the unreasonableness of the requirements. If they did, the obvious conclusion would be that the latter dwarfs the former.

Weidinger and Rachidi: “For these reasons, work requirements tend to slow the growth in spending on welfare benefits, which is scored as budget savings.”

PC Response: Nobody questions the fact that the current TANF and SNAP work requirements (as well as the proposed changes to SNAP and Medicaid) would reduce caseloads and lead to “budget savings.” (TANF is a block grant – the proposed changes wouldn’t produce any real savings for the federal government, except for the small amount that may be collected from penalties assessed on states that fail to meet the new work requirements. The TANF experience suggests that states will find ways to avoid most penalty assessments by entering into corrective compliance and/or taking advantage of remaining loopholes.)

Do voters support work requirements?

Weidinger and Rachidi: “Voters broadly support work requirements, contributing to bipartisan efforts in the past. ... This is because polls regularly find large majorities support work requirements for welfare benefits—including a majority of Democrats. For example, a 2016 AEI and Los Angeles Times survey found that 87% of respondents favored a work requirement, including strong support among the poor (81%).

More recently, a February 2023 YouGov poll found ‘Two-thirds of Americans (68%) say that people who receive assistance from welfare programs in the U.S. should be required to work or participate in job training programs if they are able to. Republicans (83%) are more likely than Democrats (64%) and Independents (61%) to say work participation should be required.’ Additionally, an April 4, 2023 ballot measure showed that almost 80 percent of Wisconsin voters said able-bodied childless adults should be expected to look for work to receive taxpayer-funded welfare benefits.”

PC Response: AEI has a history of misusing public opinion polls to advance misguided work requirement proposals. Many Americans may support the concept of work requirements *generally*, but the problem with using a simple survey question to judge public opinion is that policy details matter. If the public understood how some of the current requirements worked in practice and were provided an objective assessment of the evidence regarding their effectiveness, the results might be very different. Consider the following wording for TANF’s work requirements:

- Do you support work requirements that require a single mother with a school-age child to participate 130 hours per month in exchange for a cash benefit of as little as \$234 (or \$1.80 per hour)? (The \$234 is the maximum benefit in 2022 for a family of two in Missouri – home state to Rep. Jason Smith, Chairman of the House Ways and Means Committee.)

- Do you support work requirements that are unattainable and that cause states to fail year after year? (This was the case in Wisconsin – often cited as a model by conservatives – for five years under Governor Walker. The most recent poll in Wisconsin reflected high support for work requirements – would this support continue if voters knew that the penalties for failure might be hundreds of millions of *state* dollars?)
- Do you support work requirements that have a seemingly stringent work participation rate target, but also have a host of loopholes that allow states to meet them without engaging families in real work activities? (Illinois, home state to Rep. Darin LaHood, chairman of the Ways and Means subcommittee responsible for oversight of TANF, moved over 80 percent of families that couldn't count toward the work participation rate to a solely state funded program and thus artificially raised its work rate about five-fold.)

Or, the following wording for SNAP's work requirements:

- Do you think homeless individuals should participate in work activities for 80 hours per month in exchange for \$280 in SNAP benefits (i.e., for \$3.50 per hour)? (This is the current SNAP ABAWDs requirement.)
- Do you think states should require SNAP recipients to meet an 80-hour per month work requirement without having to provide a work or training slot? (This is the current SNAP ABAWDs requirement.)

With respect to Medicaid, suppose those responding to a poll were first given an article by Robert Rector of The Heritage Foundation (and as noted above, an ardent supporter of work requirements for TANF and SNAP), "Work Requirements in Medicaid Won't Work. Here's a Serious Alternative," which makes the following points: "work requirements for medical services would be almost impossible to administer and enforce"; the "work requirement would reduce Medicaid enrollments, but Medicaid costs might well go up because the eligible ABAWDs would go to the emergency room rather than receive routine care elsewhere"; and the "sudden enthusiasm for work requirements on medical care is ironic, given the fact that Republicans have largely failed, for a decade and a half, to promote serious work requirements on most cash, food, and housing welfare programs."²⁷ If those responding to a poll about Medicaid work requirements had this background vs. simply asking "do you think Medicaid should have a work requirement?", the results are likely to be different.

Yes, many Americans support work requirements, but most would want such requirements to be reasonable for recipients, realistic for states to meet, and about connecting low-income individuals to work. That's not what the TANF and SANP ABAWDs work requirements do and certainly not what would be the case under the proposed work requirement proposals described in the Weidinger and Rachidi in their Q&A. There is a big difference between finding out what the American public believes, in general, and writing effective legislation to put those ideals into effect.

Polls can be used in a variety of ways. A recent Gallup poll suggests that only 20 percent of adults approve of the way Congress is doing its job.²⁸ I too have concerns about the ability of Congress to write effective legislation, as evidenced by the debate over work requirements. Policymaking should be based on attention to policy details, implementation issues, and

evidence, something obviously missing in this debate for many in Congress as well as the “scholars” at AEI.

Why are House Republicans proposing this now?

Weidinger and Rachidi: “While the need to raise the debt ceiling provides a legislative opportunity, the work requirements proposed by House Republicans have a long history. In 2018, the House passed a Farm Bill that included expansions to SNAP’s work requirements that went even further than the current proposal. In 2018, the House Ways and Means Committee approved legislation that included the pro-work TANF provisions in this proposal. And the Trump administration approved waivers allowing states to create Medicaid work requirements.”

PC Response: The so-called “long history” of work requirements proposed by House Republicans is one of legislative failure. In 2018, Republicans controlled the House, the Senate, and the presidency, yet they failed to enact the proposed work requirements for SNAP and TANF. (Some might consider the 1996 legislation and the TANF reauthorization in the Deficit Reduction Act of 2005 to be legislative successes. This would be true, but both are policy failures. Either way, the record for work requirement proposals developed by House Republicans since 1996 is not one of success.)

SNAP. Weidinger and Rachidi note that the expansions to SNAP’s work requirements “went even further than the current proposal.” In particular, the original bill would have expanded the population subject to work requirements to include able-bodied adults aged 18 to 59 who don’t have children under 6 to work or participate in a work program for at least 20 hours per week. It would also have imposed much harsher sanctions than under current law. Failure to meet the bill’s work requirements would result in a one-year loss of benefits for the first infraction and three years for a subsequent one.

These requirements would have been considerably harsher than the existing (and still current) rules for ABAWDs, where the hours of participation in a workfare or community service program can be based on the SNAP allotment divided by the minimum wage – resulting in a weekly requirement of about six hours. Even Robert Rector of The Heritage Foundation expressed serious reservations about the House bill, particularly the unreasonableness of its hourly requirement:

It was easy defending the Maine program, because I could say it only asked for six hours of community service, but it has to be proportionate. The idea here is not to punish these people.²⁹

He also raised concerns in terms of the duration of the sanction – an entire year for the first infraction and three years for subsequent ones:

That’s exactly what you don’t want to do. You want to have a work program where it’s very firm but it’s very forgiving: If you didn’t do what you were supposed to do last month, okay, we’re not going to give you the benefit, but if you want to do the right thing this month we’ll put you back on the rolls.³⁰

As a result, he predicted:

The severity of these penalties is unnecessary and counter-productive. The sanctions' severity means that they are not likely to be enforced; bureaucracies will face incentives to find other legal ways to determine that recipients met work requirements regardless of whether they actually did.³¹

Rector was absolutely right about the SNAP proposals. (It's too bad he doesn't see that the same problem exists in the current TANF program – even on a larger scale in some states.)

Side Note: During the debate over the 2018 farm bill, Robert Doar expressed confidence that these requirements would garner public support, saying: “I think when it's explained to the vast majority of the American people, that this is a proposal intended to help move people into jobs where they'll have higher incomes and are less likely to be poor, most people will agree that's something we should be doing.”³² Aside from ignoring a host of other problems in the bill (e.g., insufficient funding to launch programs on the scale required), Doar's statement is based on opinion, not evidence.

As noted above, the best evidence to date suggests that the current SNAP ABAWDs work requirement has little to no impact on employment and lowers income by taking away benefits. The fact that the House farm bill in 2018 went further is irrelevant – what matters is evidence.

TANF. Weidinger and Rachidi also claim that the “pro-work TANF provisions in this proposal” are the same as those in the 2018 House Ways and Means legislation – the JOBS for Success Act. This is factually inaccurate.

The current proposal would modify TANF's current work requirements by recalibrating the base year of the caseload reduction credit from FY 2005 to FY 2022, eliminate the “excess MOE” (MOE refers to maintenance-of-effort) provision of the credit that gives states a larger credit if they spend above the basic MOE requirement, and it would make it more difficult for states to claim “small checks” to artificially inflate the work rate. (For more detail on these and other loopholes, see: “Expanding Work Requirements in Non-Cash Welfare Programs: TANF is NOT a Model, but a Cautionary Tale,” at: <https://petergermanis.com/wp-content/uploads/2021/02/TANF-No-Model.pdf>.) The JOBS for Success Act did not make ANY of these changes; instead, it would have replaced the entire work participation rate structure with a focus on work outcomes.

What Weidinger and Rachidi may not be aware of is that key work-related provisions of the May 2018 version of the JOBS for Success Act (which they cite) came under attack – from Republicans. In 2018, Republicans didn't need the support of Democrats to pass the bill out of the House. The reason the bill stalled in Congress is because conservative ideologues opposed it, arguing that it was too weak on work. They circulated a paper, “Bipartisan Efforts to Undermine Work Requirements,” which stated:

In July 2012, the Obama Department of Health and Human Services issued a proposal to

allow states to apply for waivers to the mandatory work requirements contained in the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA), a bill widely regarded as a seminal conservative achievement. The JOBS for Success Act, a bill introduced May 17th in the Ways and Means Committee and scheduled to be marked up on May 23rd, takes a similar approach, significantly vitiating the mandatory work requirements instituted by PRWORA. **Conservatives should oppose the proposal until provisions that weaken work requirements are removed from the legislation.**³³
[Emphasis in original text.]

As a result, the JOBS for Success Act was substantially revised and reintroduced in December 2018 (and subsequent years). The second version is considerably different from the first (as well as the current proposal) – with much stricter work requirements for both recipients and states. It effectively replaces TANF’s current work participation requirement with a universal engagement requirement. States must require that all work-eligible individuals who have been assessed and have an individualized plan (also a requirement) engage in specified activities for a minimum number of hours based on their family type (as under current law). Families with individuals who do not comply with these requirements would be subject to a “pro rata” sanction. In effect, the bill replaces TANF’s current (on paper) 50 percent work rate with a de facto 100 percent requirement. It also adds a new outcome measure that is subject to a penalty as well – based on the ratio of work-eligible individuals in unsubsidized employment six months after leaving to the average monthly number of families receiving assistance. In short, it makes the participation requirement more stringent and adds a new outcome requirement. States would be subject to the same penalties as under current law.

No state is anywhere near satisfying a universal engagement requirement and there is considerable uncertainty surrounding the outcome requirement. Given that the penalty can exceed the amount about a dozen states spend on families subject to these requirements (because they have diverted spending to other activities), the most likely outcome is that states will simply exploit the solely state funded loophole by rearranging how they fund state programs. This is possible because TANF is first and foremost a form of revenue sharing and because they spend so little on families with a work-eligible individual (about 10 percent of TANF/MOE funds nationally, but much less in many states).

To be fair, the JOBS for Success Act raises important questions about TANF’s effectiveness, but it does not “fix” the problems, it merely treats their symptoms. It is easy to say that states should be held “accountable” and that work requirements should be strengthened, but the devil is in the details. Conservative policymakers and their think tank advisers (including Weidinger and Rachidi) have yet to get those right and they have a long way to go to achieve the goals they claim to support.

Weidinger and Rachidi (from Part I): “The TANF changes close several loopholes in how states apply current work requirements, generally expecting a greater share of adult recipients to engage in work or productive activities. Currently, states must engage at least 50 percent of the adult TANF caseload in work or a work activity for at least 30 hours per week or face financial penalties. But current law allows reductions to the work participation rate based on caseload

declines since 2005, excess state spending, and other loopholes. The proposal updates the first policy for current caseload levels and eliminates the other loopholes.

PC Response: The Weidinger and Rachidi description of TANF’s work requirements contains several errors. While some are technical in nature, getting policy details right should be important. For example, the work requirements are “currently” no longer based on the share of “adult recipients,” but since FY 2007 on the share of families with a “work-eligible individual,” which excludes some adult recipients and includes certain non-recipient parents. “Current law” does not allow reduction in the work participation rate based on caseload decline. The caseload reduction credit does not affect the work participation rate, but rather the “adjusted target” that states must meet.

The foregoing are minor criticisms. The bigger issue is that AEI “scholars” have little understanding of the policy details surrounding “loopholes” and how to deal with them and, more importantly the proposal does not eliminate all the “other loopholes.” While the proposal eliminates the “excess MOE” provision of the caseload reduction credit, this just means that any state with such “excess MOE” can use it to create a solely state funded program. The main difference is that the former reduces the adjusted target a state faces, while the latter artificially inflates the work participation rate.

This point can be illustrated by examining how Illinois, home state to the subcommittee chairman responsible for TANF oversight – Rep. LaHood – has manipulated its work participation rate to game the system. In FY 2021, Illinois provided assistance to 27,250 families, but its TANF caseload was just 10,538. Why? The state moved 16,712 families to solely state funded programs to avoid TANF’s work requirements. The largest of these was aptly named, “Single Parent Families Not in A Countable Activity Paid with State Only Funds.” In FY 2021, the state achieved a work participation rate of 56.0 percent. However, if the solely state funded cases were added back to the denominator of the caseload, the work participation rate could fall to as low as 11 percent. Of the 10,538 families receiving assistance, only 2,162 were included in the calculation of the work participation rate. Virtually no one was reported in a traditional welfare-to-work activity – nearly all were in “unsubsidized employment.”

In FY 2021, Illinois spent less than 4 percent on basic assistance and only about 1 percent on families with a work-eligible individual in TANF. If Congress succeeds in toughening these requirements, the state could – with the stroke of a pen – move these families outside the TANF/MOE structure to a solely state funded program. In other words, there would be no work requirement. Unless Congress understands this dynamic, we will waste another opportunity to fix a broken program.

Note: The proposed legislation would not eliminate the “small checks” loophole; it would just make it more difficult. By way of background, some states make small payments (as little as \$1 per month) to families working full-time. These are generally families that left TANF or are in the SNAP caseload and have enough work hours to count in TANF’s work participation rate. These families are generally served in “separate state programs” funded with MOE dollars; this funding stream allows state to avoid some of TANF’s requirements, e.g., those associated with child support. (This loophole is yet another example of a poorly drafted law.) The proposed

legislation seeks to curb this practice by allowing states to count such families only if they: (1) agree to cooperate with child support enforcement; (2) assign any child support received to the state; and (3) undergo an employability assessment. The added costs of enforcing these new conditions might lead states to eliminate these small payments. This is certainly a possibility, but the loophole could easily be continued for a subset of the current recipients – those in two-parent families or that are already in the child support system. The required employability assessment should be a piece of cake – after all, to be included in this group, they must be working full-time already.

In any event, no one at AEI, including Weidinger and Rachidi, has ever written anything substantive about loopholes and they apparently do not realize that the proposed legislation would not solve the problem of states gaming the system. Of course, the bigger problem is that the work requirements do little to actually help recipients gain employment, because they are based on ideology and ignore policy details and evidence.

Medicaid. Weidinger and Rachidi also note that the “Trump Administration approved waivers allowing states to create Medicaid work requirements.” Section 1115 of the Social Security Act gives the Secretary of Health and Human Services authority to approve experimental, pilot, or demonstration projects that are found by the Secretary to be likely to assist in promoting the objectives of the Medicaid program. There are several problems with the way this authority was used in the Trump Administration. First, it’s debatable whether requiring work is consistent with “promoting the objective of the Medicaid program.” This was an explicit objective under AFDC and the 1115 demonstration process was used to test a wide variety of policy changes, but Medicaid is a health insurance program designed to increase access to affordable health care for uninsured Americans. Second, section 1115 waivers are a research authority and projects must be evaluated. Under AFDC, the standard policy in the 1990s was to require a randomized control trial as this produces the most credible results. This was not the policy under the Trump Administration, so to the extent that evaluations were to be conducted, none appeared to have a rigorous design plan. As a result, in all likelihood, they would not be conclusive. Third, many of the Medicaid waivers were statewide. A better approach would be to test an intervention on a smaller scale before scaling up. (This last problem was an issue with the AFDC waivers as well.)

Weidinger and Rachidi: “Policymakers are reviving these proposals as part of the debt ceiling legislation, arguing they will grow the economy by helping more low-income adults enter work and obtain higher earnings, addressing current labor shortages along the way.”

PC Response: The problem with the policymakers “reviving these proposals” is that they are not knowledgeable about work requirements or the evidence about their effectiveness. Instead, they are swayed by the misinformation provided by conservative think tanks and other politicians who simply repeat uninformed talking points.

Conclusion

The “scholars” at AEI claim to value evidence. In 2016, Robert Doar (now president of AEI) presented testimony – “Following the Evidence to Better Policy: How Evidence-Based Policymaking Helped Poor New Yorkers” – in which he wrote:

At a time when government resources are limited, it is more important than ever to make sure the programs we do fund are effective and achieve results. Relying on evidence when making decisions on how to use government funds can lead to better policy and better outcomes for Americans.³⁴

This is an important point, but time and again Doar ignores his own advice to make statements of causation based on ideology rather than evidence. For example, in a podcast in which he discussed the expanded child tax credit, he asserted, “I’m positive in fact that a new cash entitlement to families that don’t work would actually be harmful.” No evidence was provided to support this claim. (This might be difficult in a podcast, but Doar and others at AEI have made this or similar claims on many occasions without providing evidence.)

As noted above, Weidinger and Rachidi violate this principle time and again in their Q&A by misrepresenting research findings and even citing junk science as evidence. Specifically, they cite findings from AFDC welfare-to-work evaluations as if they were representative of those in TANF and then ignore the fact that employment impacts were small and faded out over time. They conclude that the research on SNAP ABAWDs is “mixed” even when most studies find no employment impact. They cite a seriously flawed report from the Buckeye Institute about the potential impact of Medicaid work requirements, while ignoring better evidence from *The New England Journal of Medicine*. They also took findings from one program (AFDC) to generalize to TANF and then further generalize to other programs (SNAP and Medicaid) that have different funding structures, target populations, and work requirement details. None of this reflects evidence-based policymaking.

Weidinger and Rachidi also tend to focus on one main outcome – employment – ignoring the implications on other outcomes when families lose access to TANF, SNAP, and Medicaid. In a March 14 tweet, their colleague Scott Winship wrote: “A good nonpartisan rule for assessing people who write about policy is to ignore people who don’t take seriously the possibility of undesirable trade-offs for what they want to do.” He was writing about those who support a child allowance who he thinks don’t consider trade-offs (they do), but this principle should apply equally to AEI’s “scholars” who rarely think about the trade-offs when families lose assistance due to unreasonable work requirements.

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 Matt Weidinger and Angela Rachidi, “Questions and Answers About Work Requirements Provisions in the House Republican Debt Limit Proposal, Part I,” American Enterprise Institute, April 21, 2013, available at: <https://www.aei.org/opportunity-social-mobility/questions-and-answers-about-work-requirements-provisions-in-the-house-republican-debt-limit-proposal-part-i/>.

³ Matt Weidinger and Angela Rachidi, “Questions and Answers About Work Requirements Provisions in the House Republican Debt Limit Proposal, Part II,” American Enterprise Institute, April 21, 2013, available at: <https://www.aei.org/opportunity-social-mobility/questions-and-answers-about-work-requirements-provisions-in-the-house-republican-debt-limit-proposal-part-ii/>.

⁴ Dana Thomson, Renee Ryberg, Kristen Harper, James Fuller, Katherine Paschall, Jody Franklin, and Lina Guzman, *Lessons From a Historic Decline in Child Poverty*, Child Trends, 2022, available at: <https://www.childtrends.org/publications/lessons-from-a-historic-decline-in-child-poverty-summary-of-findings>.

⁵ Dana Thomson, Renee Ryberg, Kristen Harper, James Fuller, Katherine Paschall, Jody Franklin, and Lina Guzman, *Lessons From a Historic Decline in Child Poverty*, Child Trends, 2022, available at: <https://www.childtrends.org/publications/lessons-from-a-historic-decline-in-child-poverty-summary-of-findings>.

⁶ Scott Winship, “The True Cost of Expanding the Child Tax Credit,” *The New York Times*, December 20, 2022, available at: <https://www.nytimes.com/2022/12/20/opinion/child-tax-credit-basic-income.html>.

⁷ U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation, *Welfare Indicators and Risk Factors, 21st Report to Congress*, April 26, 2022, Table 11, Indicator 4, available at: <https://aspe.hhs.gov/sites/default/files/documents/9dfe164f4039593c67bb5c3023b17871/21st-indicators-report-appendix-tables.pdf>.

⁸ Gayle Hamilton, Stephen Freedman, Lisa Gennetian, Charles Michalopoulos, Johanna Walter, Diana Adams-Ciardullo, Anna Gassman-Pines, Sharon McGroder, Martha Zaslow, Jennifer Brooks, and Surjeet Ahluwalia, *National Evaluation of Welfare-to-Work Strategies How Effective Are Different Welfare-to-Work Approaches? Five-Year Adult and Child Impacts for Eleven Programs*, MDRC and Child Trends, December 2001, available at: https://www.mdrc.org/sites/default/files/full_391.pdf.

⁹ Gordon L. Berlin, “What Works in Welfare Reform: Evidence and Lessons to Guide TANF Reauthorization,” MDRC, June 2002, pp. 36-37, available at: http://www.mdrc.org/sites/default/files/TANFGuide_Full.pdf.

¹⁰ Justin Falk, “The Effects of Work Requirements on the Employment and Income of TANF Participants” Congressional Budget Office, March 2023, available at: <https://www.cbo.gov/system/files/2023-03/58867-TANF.pdf>.

¹¹ U.S. Government Accountability Office, *Temporary Assistance for Needy Families: 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>.

¹² Gene Falk, “Temporary Assistance for Needy Families,” Congressional Research Service, March 27, 2018.

¹³ LaDonna Pavetti, Aditi Shrivastava, and Diana Azevedo-McCaffrey, “TANF Provisions in McCarthy Bill Give States Incentives to Take Cash Benefits Away From Families With the Most Significant Needs,” Center on Budget and Policy Priorities, April 26, 2023, available at: <https://www.cbpp.org/research/income-security/tanf-provisions-in-mccarthy-bill-give-states-incentives-to-take-cash>.

¹⁴ Angela Rachidi, “Do Work Requirements in Safety Net Programs Work,” American Enterprise Institute, March 20, 2023, available at: <https://www.aei.org/opportunity-social-mobility/do-work-requirements-in-safety-net-programs-work/>.

¹⁵ Timothy F. Harris, “Do SNAP Work Requirements Work?,” Upjohn Institute Working Paper 19-297 (Kalamazoo, MI: W.E. Upjohn Institute for Employment Research), available at: <https://doi.org/10.17848/wp19-297>.

¹⁶ Kye Lippold and Remy Levin, “The Effects of Transfer Programs on Childless Adults: Evidence from Food Stamps,” June 14, 2021, available at: https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3655794.

¹⁷ Jehoon Han, “The impact of SNAP work requirements on labor supply,” *Labour Economics*, Volume 74, January 2022, available at: <https://www.sciencedirect.com/science/article/abs/pii/S092753712100124X?via%3Dihub>.

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- ¹⁸ Colin Gray, Adam Leive, Elena Prager, Kelsey B. Pukelis, and Mary Zaki, “Employed in a SNAP? The Impact of Work Requirements on Program Participation and Labor Supply,” NBER Working Paper 28877, June 21, available at: <https://www.nber.org/papers/w28877>.
- ¹⁹ Laura Wheaton et. al., The Impact of SNAP Able-Bodied Adults Without Dependents (ABAWD) Time Limit Reinstatement in Nine States (The Urban Institute, June 2021, available at: https://www.urban.org/sites/default/files/publication/104451/the-impact-of-snap-able-bodied-adults-without-dependents-abawd-time-limit-reinstatement-in-nin_0.pdf.
- ²⁰ Tracy Vericker, Laura Wheaton, Kevin Baier, and Joseph Gasper, “The Impact of ABAWD Time Limit Reinstatement on SNAP Participation and Employment,” *Journal of Nutrition Education and Behavior*, Volume 55, Issue 4, April 2023, pp. 285-296, available at: <https://www.sciencedirect.com/science/article/abs/pii/S1499404623000088>.
- ²¹ Rea S. Hederman Jr., Andrew J. Kidd, Tyler Shankel, and James Woodward, “Healthy and Working: Benefits of Work Requirements for Medicaid Recipients,” The Buckeye Institute, December 3, 2018, available at: <https://www.buckeyeinstitute.org/library/docLib/2018-12-03-Healthy-Working-Benefits-of-Work-Requirements-for-Medicaid-Recipients-policy-report.pdf>.
- ²² Matt Broadus, “Research Note: Report Claiming Medicaid Work Requirements Would Lead to Large Income Gains Is Fundamentally Flawed,” Center on Budget and Policy Priorities, January 17, 2019, available at: <https://www.cbpp.org/research/health/research-note-report-claiming-medicaid-work-requirements-would-lead-to-large-income>.
- ²³ Caitlin Dewey, “They’re the think tank pushing for welfare work requirements. Republicans say they’re experts. Economists call it ‘junk science,’” *The Washington Post*, May 18, 2018, available at: <https://www.washingtonpost.com/news/work/wp/2018/05/18/theyre-the-think-tank-pushing-for-welfare-work-requirements-republicans-say-theyre-experts-economists-call-it-junk-science/>.
- ²⁴ Benjamin D. Sommers, Anna L. Goldman, Robert J. Blendon, E. John Orav, and Arnold M. Epstein, “Medicaid Work Requirements — Results from the First Year in Arkansas,” *The New England Journal of Medicine*, September 12, 2019, available at: <https://www.nejm.org/doi/10.1056/NEJMSr1901772>.
- ²⁵ Angela Rachidi, “Do Work Requirements in Safety Net Programs Work?,” American Enterprise Institute, March 20, 2023, available at: <https://www.aei.org/opportunity-social-mobility/do-work-requirements-in-safety-net-programs-work/>.
- ²⁶ Robert Rector, “Work Requirements in Medicaid Won’t Work. Here’s a Serious Alternative,” The Heritage Foundation, March 19, 2017.
- ²⁷ Robert Rector, “Work Requirements in Medicaid Won’t Work. Here’s a Serious Alternative,” The Heritage Foundation, March 19, 2017.
- ²⁸ Gallup, available at: <https://news.gallup.com/poll/1600/congress-public.aspx>.
- ²⁹ Robert VerBruggen, “Welfare Reform 2.0,” *The National Review*, April 26, 2018, available at: <https://www.nationalreview.com/magazine/2018/05/14/republicans-welfare-reform-efforts-improve-food-stamps/>.
- ³⁰ Robert VerBruggen, “Welfare Reform 2.0,” *The National Review*, April 26, 2018, available at: <https://www.nationalreview.com/magazine/2018/05/14/republicans-welfare-reform-efforts-improve-food-stamps/>.
- ³¹ Robert Rector, Jamie Bryan Hall, and Mimi Teixeira, “Five Steps Congress Can Take to Encourage Work in the Food Stamps Program,” The Heritage Foundation, April 20, 2018, available at: https://www.heritage.org/sites/default/files/2018-04/IB4840_1.pdf.
- ³² Caitlin Dewey, “GOP proposes stricter work requirements for food stamp recipients, a step toward a major overhaul of the social safety net,” *The Washington Post*, April 12, 2018, available at: <https://www.washingtonpost.com/news/work/wp/2018/04/12/gop-proposes-stricter-work-requirements-for-food-stamp-recipients-a-step-toward-a-major-overhaul-of-the-social-safety-net/>.
- ³³ See “Bipartisan Efforts to Undermine Work Requirements”; this paper has no author or date, but is available on request; contact me at petergermanis1@gmail.com.
- ³⁴ Robert Doar, “Following the Evidence to Better Policy: How Evidence-Based Policymaking Helped Poor New Yorkers,” Statement before the Senate Finance Committee On “Can Evidence Based Practices Improve Outcomes for Vulnerable Individuals and Families?,” May 10, 2016, available at: <https://www.finance.senate.gov/imo/media/doc/10MAY2016Doar.pdf>.