

Maine DOES NOT Show How to Make Welfare Work: A Response to Jared Meyer and Mary Mayhew

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In “Maine Shows How To Make Welfare Work,” Jared Meyer, a senior research fellow at the Foundation for Government Accountability, interviews Mary Mayhew, former Commissioner of the Maine Department of Health and Human Services.² The central focus of the interview is about “what federal welfare reformers can learn from her success of the past half-decade in Maine.” During the course of the interview, both Meyer and Mayhew make a number of claims about the putative success of Maine’s welfare reform efforts, but the evidence used to support their claims is seriously lacking. Indeed, it is far more likely that Maine’s efforts have done little to provide actual help and have left many of the poor behind. Welfare reform should be based on facts and evidence, not conservative talking points and misleading data analyses.

Most conservatives claim that the 1996 welfare reform law, and the creation of the Temporary Assistance for Needy Families (TANF) block grant, was a “tremendous success” and that it should be used as a model for reforming the rest of the safety net. I argue that TANF is a massive policy failure and should not be held out as an example of “conservatism.” I favor an alternative, conservative approach based on a model developed in the Reagan Administration that provided states flexibility, but had strong accountability provisions to ensure that states actually help needy families (most notably a requirement for rigorous evaluation). This model was continued by President Bush and President Clinton until 1996 when TANF replaced it with a blank check to states. TANF has become a form of revenue sharing – welfare for state politicians’ wish lists rather than needy families. It is time for conservatives to develop an alternative approach to welfare reform – one that adequately protects our nation’s neediest families and gives them real opportunities to achieve self-sufficiency. And, it must include more emphasis on rigorous evaluation so that we can test claims of success (and failure). This requires a return to more randomized control trials – the standard used before TANF came along.

For the past two years, I have been writing papers as a citizen to highlight TANF’s many problems. My hope is that conservatives will adopt more “rigor” in their assessment of the 1996 law and use evidence rather than ideology in developing reform proposals. This response addresses some of the claims made by Meyer and Mayhew about TANF and welfare reform generally, followed by a “PC Response.” (“PC” is short for “Peter the Citizen.”)

Meyer: “On May 25, the Maine Department of Health and Human Services released a report on how individuals who transitioned off Temporary Assistance for Needy Families (TANF) fared in the years that followed. This report follows Governor Paul LePage’s 2012 decision to enforce existing time limits for this supposedly temporary program’s eligibility. Despite claims that moving people off government assistance would result in widespread hardship, the data show that promoting work over welfare helped people substantially increase their incomes, which saved taxpayer dollars and preserved public resources for the truly needy.

In what follows, outgoing Commissioner of the Maine Department of Health and Human Services Mary Mayhew shares the findings from the new report and reflects on what federal welfare reformers can learn from her success over the past half-decade in Maine.”

PC Response: Meyer begins with a reference to a May 25 report from the Governor’s Office of Policy and Management – “Wage and Employment Outcomes of TANF Participants Closed for Time Limits.”³ The report presents data on a cohort of 1,856 individuals whose TANF benefits were terminated in 2012 as Maine started to enforce the federal five-year time limit on the receipt of cash assistance. It compares various outcomes for the year before the policy took effect to a yearlong period between 2015 and 2016, using data from the Maine Department of Health and Human Services and the Maine Unemployment Insurance (UI) system. A key finding in the report is a significant increase employment and earnings between a baseline period and a subsequent follow-up period:

The group of TANF leavers that had wage records experienced a significant increase in total wages following the policy change. For the group as a whole, total wages increased 237 percent from the baseline period (four quarters prior to the policy change; second quarter of 2011 through the first quarter of 2012) to the comparison period (the last four quarters for which data was available; the second quarter of 2015 through the first quarter of 2016). Growth in total wages was driven by strong gains in average quarterly wages and the number with a wage record; each grew 84 percent from the baseline through the comparison period.⁴

Meyer asserts, based on this and similar findings, that “the data show that promoting work over welfare helped people substantially increase their incomes, which saved taxpayer dollars and preserved public resources for the truly needy.” This conclusion, particularly the assertion that the data “show” that Maine’s time limit policy “helped people substantially increase their incomes,” is wrong on several counts. First, the report focuses primarily on earnings and says virtually nothing about total “incomes.” In particular, given the loss in cash assistance, it is quite possible – even likely – that *total* incomes, on average, are lower. Second, a simplistic before-and-after comparison of a limited number of outcomes is not a credible way of measuring causal effects. The report itself cautions that one cannot attribute changes in employment outcomes to the time limit policy:

The results presented in this report describe the employment outcomes for individuals that exited Maine’s TANF program for time limits in the second quarter of 2012. This information provides important feedback to administrators and program managers regarding the employment status of former program participants. **Further analysis is required to identify and attribute causation to the underlying changes in outcomes reported in this study** (*emphasis added*).

There are many threats to the internal validity of a pre-post study. For example, the state of the economy was different in the two measurement periods, as described in the report:

Maine’s unemployment rate in June, 2012 was 7.5 percent, below the 8.2 percent national unemployment rate and down from a recession high of 8.3 percent in 2009. Since 2012,

Maine's unemployment rate steadily improved through the first quarter of 2016, when it hit an expansion low of 3.4 percent. Reflecting an improving economy, total wages in Maine's private sector increased 14 percent from the baseline through the comparison period and the average quarterly wage increased 10 percent. Maine's improving economy should be considered when evaluating the results presented in this report.

And, measuring employment rates and wages for a cohort of TANF *recipients* may capture them at one of their lowest points in terms of employment and earnings – after all, that's why they are on assistance. Many low-income earners move in and out of jobs (and on and off assistance). It should come as no surprise that there was an improvement over time. Pre-post studies face many threats to internal validity (e.g., maturation, history, secular trends, and regression to the mean) and are, in general, not a credible approach for assessing net impacts of social programs.

The gold standard for evaluation is random assignment. The findings from random assignment experiments are considered the most credible, because the experimental and control groups are alike and subject to the same external conditions, with the only difference being the intervention itself. Any difference in outcomes between the groups can be attributed to the intervention – welfare reform – itself. Thus, policymakers could have confidence in whether the state reforms actually reduced welfare dependency and poverty by increasing self-sufficiency. If Maine were serious about determining the effects of the time limit, it could have randomly assigned the cohort of 1,856 individuals to an experimental group that has its benefits terminated and a control group that continues to operate without the application of the time limit.

Even without a rigorous evaluation, the report's findings can be used to paint a very different picture. Figure 4 of the report indicates that the employment rate grew from about 18 percent in the baseline period to 34 percent in the last quarter of follow up (quarter 1 of 2016). Even if one claims the entire increase of 16 percentage points as the impact, this still means 66 percent did not have an earnings record in that final quarter. With the loss of cash assistance, many of these leavers undoubtedly have less income. The report also notes that “64 percent of the TANF leavers had a wage record in Maine's UI wage system at some point over the period of analysis, which began in the second quarter of 2011 (four quarters prior to the policy change) and ran through the first quarter of 2016.” This means that 36 percent had no wage record over the entire study period! Where is the analysis of what happened to the incomes of those without jobs?

The purpose of this response is not to provide a full-blown critique of the Maine report, but simply to note that a more complete data comparison suggests that the time limit policy does not support Meyer's exaggerated claims of success. If anything, the report suggests that the time limit policy likely resulted in a sharp decline in cash income for many families.

Mayhew: “For far too long, the 1996 federal welfare reforms of time limits and work requirements had been blatantly ignored – to the absolute detriment of needy families.”

PC Response: If the “1996 federal welfare reforms of time limits and work requirements” are ignored, it is because TANF is not really “welfare reform,” but a fixed and flexible funding stream – a form of revenue sharing. Nothing in TANF works the way Congress intended, most notably its work requirements.

The Failure of TANF Work Requirements in Maine. Maine is a perfect example of how TANF's work requirements have worked – “to the absolute detriment of needy families.” In fiscal year (FY) 2015, Maine reported an average monthly TANF and separate state program (SSP) caseload of 22,403; 19,984 of these families were included in the denominator of the work rate and 14,236 were “participating families” and included in the numerator.⁵ Its overall work participation rate was 71.3 percent.

Maine's work rate appears impressive until one breaks out the rate it achieved in TANF (16.3 percent) and in the state's “separate state program” (80.6 percent).⁶ The latter group was made up of 17,688 cases that did not receive a regular TANF benefit, but were expected to work enough hours to count in the work rate and were provided a \$15 a month “worker supplement” to artificially boost the state's participation rate. In other words, nearly 80 percent of the state's total caseload was not part of the state's main cash assistance program; the cases were added simply to manipulate the work rate.

Here is how the Alexander Group, consultants to Maine, described the strategy:

Maine corrected the overall WPR [work participation rate] through a corrective-compliance plan... This was achieved by the end of FFY 2012. Maine achieved this compliance by adding a worker-supplement benefit (\$15 per month), which allowed Maine to count families that have transitioned from TANF and are working the required number of hours to meet the work participation requirement. This benefit is provided to approximately twenty thousand families per month and is included as part of the TANF-MOE caseload. ...Without this new initiative, Maine would not achieve its WPR.⁷

Is this really an example of how Maine is leading the way in “making welfare work”? This did nothing to help needy families attain self-sufficiency, yet this has been Maine's primary strategy for meeting TANF's federal work requirements for at least four years. The goal should be to engage families to reduce the need for public assistance.

I have written extensively about the failure of TANF's work requirements and won't delve into the details here, but for more on Maine's gimmick and other strategies states use to meet federal work requirements aside from actually engaging families in real work activities, see:

- “TANF Work Requirements: An Epic Fail,” in *TANF is Broken! It's Time to Reform “Welfare Reform” (And Fix the Problems, Not Treat their Symptoms)*, July 25, 2015 draft, available [here](#).
- “The Failure of TANF Work Requirements: A *Much Needed* Tutorial for the Heritage Foundation and the American Enterprise Institute,” August 12, 2016, available [here](#).
- “The Failure of TANF Work Requirements in 2015: The Need for ‘A *Much Better* Way,’” December 20, 2016, available [here](#).

Work requirements are an important tool, but TANF's work requirements are unreasonable, dysfunctional, and are not about work. Real welfare reform requires adequate funding, realistic work requirements, and rigorous evaluation so that we can learn what works and what doesn't and build on an evidence base. It should be about giving needy families a hand up, but instead, under TANF, it has abandoned them.

TANF Time Limits. When Congress enacted TANF, many states were testing time limits and these experiments were subject to rigorous evaluations. Unfortunately, Congress didn't wait for the results and to this day, there is no credible evidence regarding the impact of the federal five-year time limit or any other type of time limit for that matter. Mayhew's statement about ignoring federal time limits being "detrimental to families" is speculation, and Maine's recently released report does not make a strong case for the efficacy of the federal time limit in increasing employment or earnings. In fact, a more careful analysis suggests that far more families were disadvantaged than "helped."

Mayhew: "There is no doubt that the best way out of poverty is a job, and we were determined to successfully support that pathway to self-sufficiency and independence in Maine. This is what led to our enforcement of a five-year lifetime limit on TANF benefits."

PC Response: A hard time limit certainly increases the incentive to work – basic economic theory tells us that. But, to suggest that this approach to cutting families off assistance is a "pathway to self-sufficiency and independence" is not a credible claim. The report does not provide a credible basis for making causal statements, but even if one believed in the simplistic pre-post approach to causation, the impacts are relatively small – at least compared to the size of the group that was not employed and not receiving assistance at a particular point in time.

Mayhew: "Many criticized our ideas, so it was imperative for us to demonstrate that these reforms worked by collecting data. We tracked the employment history and wages of those individuals who were time limited off TANF in 2012. It is important to note that when we established and enforced the TANF time limits, we also focused on supporting access to critical job-placement resources. These include programs such as skills training, GED classes, resume writing, and interview preparation to support individuals returning to or entering the workforce."

PC Response: Many will continue to criticize Maine's approach precisely because the report **did not demonstrate** that the state's policies are working. Mayhew confuses "collecting data" with an evaluation – one that has a credible counterfactual. Simply following a cohort before and after a policy change is not a credible way of assessing the net effects of a policy, because it does not control for various threats to validity. To the extent that the state actually provided access to more employment and training services, it would be helpful to document that, as it is not apparent in the state's work participation data. (A real evaluation would have done that.)

Mayhew: "I was not surprised that the results of promoting work rather than discouraging it were shown to be dramatic and a stark contrast to the years of allowing people to remain in poverty, dependent on government assistance. Over the four-year period after our reforms, people who had prior earnings records saw their wages increase by an average of 237%. This was from the baseline period in the year before the reforms compared to the last three quarters in

2015 and the first quarter of 2016. Additionally, total earnings for this group of people grew from \$2.6 million to \$8.6 million during the evaluation period. For those who had not been working prior to the new policy's implementation, their results were even more impressive. Their wages increased by 1,000%, with the number of people working more than doubling."

PC Response: Percentage increases can be deceiving when starting from a low base. If Mayhew and Meyer want to convince others that Maine's approach is a success, then they should explain why 65 percent or more of the cohort time limited off assistance had no employment in any given quarter and why 34 percent had no wage record over the entire period. What happened to these people?

Some insight can be gained from a study by Sandra Butler, a professor of Social Work at the University of Maine, who conducted a survey and interviews with some of those who lost assistance after their benefits were terminated. Her findings suggest that many of those terminated had "work-limiting disabilities" or had a child or other dependent with a disability. Many also experienced "severe hardships."⁸ Even if the time limit policy helped motivate some families to work or work more,⁹ it undoubtedly left many worse off, something Meyer and Mayhew ignore.

The claims of success by Meyer and Mayhew are not credible and that is why it is so important for policymakers to evaluate policy changes rigorously. That is also one of the saddest things about TANF – it ended an evidence-based approach to welfare reform. It is now too late to go back and reevaluate the impact of Maine's cut-off in a rigorous manner, but for that reason Maine **does not** "show how to make welfare work."

Meyer: "This report follows your department's tracking of individuals who received food stamps through the Supplemental Nutrition Assistance Program (SNAP). A year after work requirements for able-bodied adults who receive food stamps were put into effect in October 2014, those who cycled off the program saw their incomes more than double on average. This increase in earnings more than offset the lost welfare benefits. Additionally, the number of able-bodied adults on the program has fallen from 16,000 to 4,500."

PC Response: Maine's SNAP analysis is also flawed because it fails to provide a credible counterfactual and cherry picks the way it reports outcomes. For a critique of this study, see Dorothy Rosenbaum and Ed Bolen, "SNAP Reports Present Misleading Findings on Impact of Three-Month Time Limit," Center on Budget and Policy Priorities, December 14, 2016, available [here](#). If Meyer and Mayhew (and other "pre-post conservatives") want to be taken seriously, they need to address the methodological weaknesses of the studies they cite as examples of success.

Mayhew: "My colleagues in Maine refuse to accept that welfare should [not?] be a way of life. Policymakers often talk about the American dream, but poorly designed welfare programs can trap people in a nightmare of poverty and despair."

PC Response: I know how Mayhew feels. Many of my conservative colleagues refuse to accept rigorous evaluation as a way of assessing the impact of social programs, but instead rely

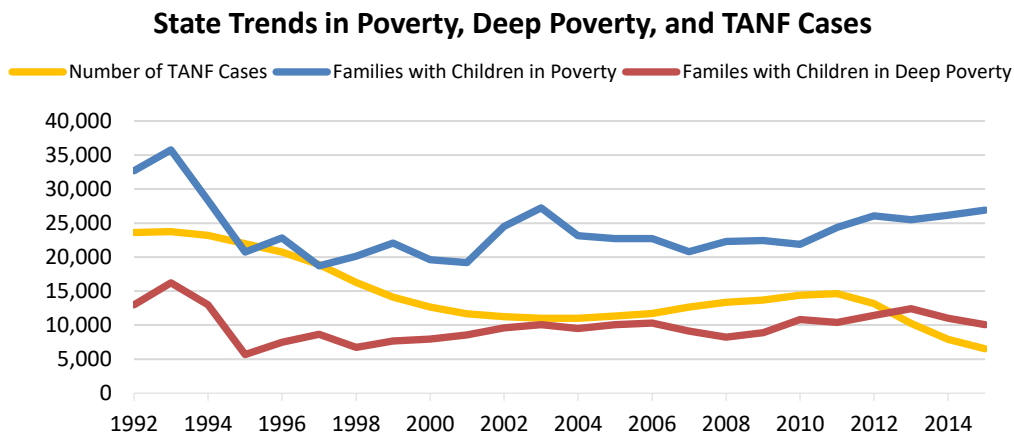
on simplistic before-and-after comparisons of outcomes to justify dysfunctional programs and policies. TANF is the quintessential example of a “poorly designed” program that has “trapped people in a nightmare of poverty and despair.” It is the epitome of dysfunctional conservatism.

Mayhew: “Maine, like too many other states, measured welfare programs’ successes by ever increasing caseloads instead of by the number of individuals who successfully transitioned off the programs by increasing their earnings.”

PC Response: Many conservatives measure the success of welfare reform by simply looking at caseload declines, irrespective of economic conditions. Reducing caseloads is important, but the goal of public policy should be to reduce caseloads by reducing the need for assistance.

Meyer: “Under you and Governor Paul LePage, Maine has been a leader in welfare reform. Before both of you took office in 2011, one out of every three Maine residents was on welfare. Since then, the state has moved 80,000 people off Medicaid and 70,000 off food stamps, but I assume that there are still other areas that can be improved. Are there any other welfare reforms that you wish you could have implemented?”

PC Response: Meyer focuses on welfare caseloads, but success should be based on more. As seen in the figure below, since TANF was enacted, caseloads are way down, but poverty (and deep poverty) among families with children is up. That’s not success!



Source: See detailed state-by-state tables at: Ife Floyd, LaDonna Pavetti, and Liz Schott, “TANF Reaching Few Poor Families,” Center on Budget and Policy Priorities, March 30, 2017, available at: <http://www.cbpp.org/research/family-income-support/tanf-reaching-few-poor-families>.

Mayhew: “As for TANF, I would certainly like to see our lifetime time limit reduced from five years to three years. The program has ‘temporary’ in its name, after all.”

PC Response: This is an irresponsible policy recommendation, based on nothing other than the word “temporary” in the program’s name. The appropriate duration of a time limit and its applicability should be based on rigorous evidence regarding the impacts of such a policy. The

name also has the words “assistance for needy families.” In many states, TANF has become a slush fund; a *permanent* source of welfare for state politicians.

Mayhew: “There is also more work to be done to ensure that the resources to support education and training are directly tied to current job availability in Maine.”

PC Response: This is an understatement. Throughout most of the time period examined by the “time limit” report, Maine appears to have done very little to engage TANF families in concrete work activities, relying instead on a gimmick to satisfy the federal work participation requirements.

Mayhew: “Additionally, we need to remain vigilant in our efforts to guard against fraud and abuse in these programs. One dollar fraudulently acquired or used, is a dollar not being used to provide food for a needy child.”

PC Response: Preventing fraud and abuse in all programs is important, but to suggest that a dollar fraudulently obtained “is a dollar not being used to provide food for a needy child” is a bit disingenuous. The savings really revert to taxpayers (and there is nothing wrong with that). Of course, it is possible that Maine does or would use savings generated by these initiatives to provide more aid to the “truly needy,” but that does not appear to be case. Indeed, Mayhew was recently criticized harshly by the editorial board of a Maine news outlet:

During her six years as Maine commissioner of health and human services, Mary Mayhew liked to talk about “the truly needy.”

She would roll out the phrase when she was explaining why Maine should offer less help, pay for fewer services or step back from its responsibilities to some people so there would be enough to pay for supports to others whom she considered more deserving.

... it’s still unclear what truly needy group she had in mind.

It certainly couldn’t have meant children: The rate of children living in deep poverty, or \$800 in income a month for a family of three, has skyrocketed under her watch, growing eight times faster than the national average.

She couldn’t have meant low-income senior citizens. She pushed through cuts to the Drugs for the Elderly program, which had helped thousands of needy Mainers buy prescription medications.

And she must not have meant people with mental illness or intellectual disabilities, because she promoted cuts to reimbursement rates for their care, limiting community-based options that were already inadequate to meet their needs.

Mayhew called all this “welfare reform,” but that would be accurate only if tearing down a house could be called “remodeling.” Maine is less healthy and less humane after Mayhew’s tour as the official in charge of the state’s health and human services.¹⁰

Meyer: “President Trump promised in his inaugural address that ‘we will get our people off of welfare and back to work.’ Since your last day as commissioner was May 26, what are the most important lessons that President Trump and other policymakers in Washington can learn from your tenure in Maine?” **Mayhew:** “Welfare reform should focus on protecting resources for the truly needy, promoting work, and restoring program integrity to guard against fraud and abuse. Taking concrete steps towards these goals restores taxpayers’ faith that their hard-earned tax payments are being used wisely and effectively. For far too long, these welfare programs have contributed to the welfare poverty trap and have perpetuated dependence on government assistance. The limited taxpayer dollars that are dedicated to welfare programs must be used to support pathways out of poverty. To accomplish this, welfare programs must promote work wherever possible. Reformers need to understand that work and the accompanying self-esteem transforms lives. Working is key to promoting self-reliance, stable families, connected communities, and greater economic prosperity.”

PC Response: I agree with Mayhew about focusing on the truly needy and promoting work, but the real question is how to achieve these goals. Mayhew suggests that welfare reform should guard against fraud and abuse. And, she supports time limiting welfare, whether it’s enforcing a five-year (even three-year) time limit on TANF and the three-month time limit for ABAWDs in the SNAP program. Unfortunately, she does not provide credible evidence that these policies are effective in doing much more than cutting caseloads.

Sadly, the paucity of effective strategies for reducing poverty seems to be representative of conservative welfare policy today. Last year Speaker Ryan released the “Poverty, Opportunity, and Upward Mobility” report as part of a series of reports under the rubric of *A Better Way*.¹¹ Unfortunately, there were no bold new ideas or policy specifics; the report was a mere 35 pages, relying on colorful charts, rather than informed analysis. It presented a misleading and distorted picture of our nation’s efforts to reduce poverty. Indeed, this characterization is too mild. The report reflects little understanding of the data and research surrounding the welfare system, is highly partisan and polarizing, and presents vague policy options. (I wrote extensively about the report’s problems in a recent paper, “Speaker Ryan’s ‘Poverty, Opportunity, and Upward Mobility Report’: The Need for ‘A *Much* Better Way’.”¹²)

Conclusion: Show Me the Evidence!

If the goal is to look for ways to “make welfare work,” then looking to Maine or to Speaker Ryan is *not* the solution. We need to return to a model advanced by President Reagan. In 1987, he started encouraging states to use existing authority to conduct welfare reform experiments – through waivers of AFDC’s rigid rules (and, to a lesser extent, food stamp and Medicaid rules due to more limited waiver authorities for those programs). This approach was continued by President Bush and President Clinton. When the 1996 law passed, many states simply continued these policies – they didn’t need TANF to enact “welfare reform” because they had already done it through waivers. This process did not provide a fixed level of funding, like block grants. Instead, it relied on an approach that would provide a real counterfactual using the “gold standard” of evaluation – random assignment – for both cost neutrality and evidence-based learning.¹³ This approach provided rigorous evidence, including many examples of state

experiments that increased employment and earnings, and also reduced welfare dependency and poverty.¹⁴ TANF ended this approach to welfare reform and now there is virtually no credible evidence about the effects of state welfare reform efforts. Instead, the waiver process should have been improved and expanded across more welfare programs.¹⁵ To show “how to make welfare work,” one should look to the “Reagan model”; not to TANF or to Maine.

¹ The views in this document reflect my own as a citizen and do not reflect the views of any organization I am now or have ever been affiliated with. By way of background, I am a conservative and have worked on welfare issues for the Heritage Foundation, the American Enterprise Institute, and the White House under both President Reagan and President George H.W. Bush. This paper assumes the reader has a basic understanding of the TANF program, but for those readers who want more context and background, see Peter Germanis, *TANF is Broken! It's Time to Reform "Welfare Reform" (And Fix the Problems, Not Treat their Symptoms)*, July 25, 2015 draft, available at: <http://mlwiseman.com/wp-content/uploads/2013/09/TANF-is-Broken.072515.pdf>.

² Jared Meyer, *Maine Shows How To Make Welfare Work*, June 1, 2017, available at:

<https://www.forbes.com/sites/jaredmeyer/2017/06/01/maine-shows-how-to-make-welfare-work/#3cb78cae5ee1>

³ State of Maine, Governor's Office of Policy and Management, "Wage and Employment Outcomes of TANF Participants Closed for Time Limits," May 25, 2017, available at:

<http://www.maine.gov/economist/docs/TANF%20Report%20Final%20205-25-17.pdf>.

⁴ State of Maine, Governor's Office of Policy and Management, "Wage and Employment Outcomes of TANF Participants Closed for Time Limits," May 25, 2017, p. 2, available at:

<http://www.maine.gov/economist/docs/TANF%20Report%20Final%20205-25-17.pdf>.

⁵ This is an oversimplification; the actual work rate is calculated by averaging monthly work participation rates for each state; this is not the same as using the average monthly numerator and denominator, but it is generally close.

⁶ Using a "separate state program" to pay token benefits avoids triggering the federal time limit and other requirements when federal TANF funds are used.

⁷ "Baseline Analysis of Maine's Public Welfare System: A Review Submitted to the Commissioner of Health & Human Services, Final Report, May 2014."

⁸ Sandra Butler, "TANF Time Limits and Maine Families: Consequences of Withdrawing the Safety Net," March 2013, available at: <https://www.mejp.org/sites/default/files/TANF-Study-SButler-Feb2013.pdf>.

⁹ For one such "success story," see Melissa Quinn, "How Maine Reformed Its Welfare System," *Insider Online*, May 15, 2017, available at: <http://www.insideronline.org/2017/05/how-maine-reformed-its-welfare-system/>.

¹⁰ Editorial Board, "Our View: Mary Mayhew's history of misplaced priorities," *Portland Press Herald*, May 27, 2017, available at: <http://www.pressherald.com/2017/05/28/our-view-mary-mayhews-history-of-misplaced-priorities/>.

¹¹ "Poverty, Opportunity, and Upward Mobility," in *A Better Way: Our Vision for a Confident America*, June 7, 2016, available at: <http://abetterway.sp.eaker.gov/assets/pdf/ABetterWay-Poverty-PolicyPaper.pdf>.

¹² Peter Germanis, "Speaker Ryan's 'Poverty, Opportunity, and Upward Mobility Report: The Need for 'A Much Better Way'," August 17, 2016, available at: <http://mlwiseman.com/wp-content/uploads/2016/05/The-Need-for-a-Much-Better-Way.Final.pdf>.

¹³ See Judith M. Gueron and Howard Rolston, *Fighting for Reliable Evidence* (New York, NY: Russell Sage Foundation, June 2013) and Michael E. Fishman and Daniel H. Weinberg, "The Role of Evaluation in State Welfare Reform Waiver Demonstrations," in *Evaluating Welfare and Training Programs*, edited by Charles Manski and Irv Garfinkel, (Harvard University Press, January 1992), pp. 115-142.

¹⁴ Jeffrey Grogger, Lynn A. Karoly, and Jacob Alex Klerman, *Consequences of Welfare Reform: A Research Synthesis* (Santa Monica, CA: July 2002),

http://www.acf.hhs.gov/programs/opre/welfare_employ/res_synthesis/reports/consequences_of_wr/rand_report.pdf.

¹⁵ For a discussion of some of these issues, see Michael L. Wiseman and Mark Greenberg, "Fixing Welfare Waiver Policy," *Public Welfare*, Winter 1995, pp. 10-17. These are two separate articles, but share the same title.