TANF in Michigan: Did We Really "Fix" Welfare in 1996?
A Cautionary Tale for Speaker Ryan

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Many conservatives view the 1996 welfare reform law (particularly the creation of the Temporary Assistance for Needy Families or TANF block grant) an unprecedented success and a model for reforming other safety net programs. This theme was repeated in a recent hearing by the House Ways and Means Committee, when former Michigan Governor John Engler stated in his written testimony (and throughout the hearing) that the 1996 law was a success because, "Washington focused on the overarching goals and left it to the states to determine implementation strategies and methods."[2]

Speaker Ryan has also expressed this view on numerous occasions. In his December 3, 2015, speech at the Library of Congress, he laid out his vision for 2016 and reiterated this message:

> In 1996, we created a work requirement for welfare. But that was just one program. We have to fix all the others now.
>
> . . . I'd combine a lot of them [welfare programs] and send that money back to the states for better poverty-fighting solutions. Require everyone who can to work. Let states and communities try different ideas. And then test the results. [3]

If Governor Engler and Speaker Ryan are correct, we should be able to look to the states today to see their creative "poverty-fighting solutions." Michigan has been very creative, but not in developing effective approaches for reducing poverty. Instead, its creativity is reflected in manipulating TANF's funding structure and work requirements to maximize "welfare" for the state – not for needy families.[4] Michigan has proven itself very adept at:

- Using federal TANF funds to supplant existing state expenditures and otherwise fill state budget holes;
- Circumventing the state's maintenance-of-effort (MOE) requirement to minimize its own expenditures for the program; and
- Gaming the federal work requirements by artificially inflating the numerator, artificially reducing the denominator, and artificially enlarging the caseload reduction credit.

Meanwhile, TANF cash assistance has virtually all but disappeared for needy families.

TANF's Withering Cash Assistance Safety Net in Michigan

Between 1995/96 and 2013/14, the number of poor families with children in Michigan grew from 208,200 to 213,000, as did the number of families with children in deep poverty – from 89,100 to 93,900. Meanwhile, the number of families receiving AFDC/TANF fell by nearly 80 percent, from 183,800 to 39,000. As a result, for every 100 poor families with children in 2014, only 18 received cash assistance, down from 88 before TANF was enacted.[5] In FY 2014, the state spent just 12 percent of its TANF/MOE funds on basic assistance, whereas before TANF it was 80 percent.[6]

Unbelievably, some view this record as evidence of success. For example, Terry Jones, writing for *Investors.com*, states:

> Those looking for success in welfare reform might want to look at Michigan. According to the news site Michigan Capitol Confidential, the Great Lake State saw a 70% decline in its welfare population in just four years. That's right: 70%.
>
> …As the economy has improved, the state has begun doing what many states refuse to do: enforcing a 48-month lifetime limit for cash welfare assistance and a 60-month federal limit. As a result, the total number on welfare plummeted…[7]

According to a spokesman for the Michigan Department of Health and Human Services, "As the governor said at the time of the decision to enforce time limits, this was returning cash assistance to its original intent – a transitional program to help families as they work toward self-sufficiency while preserving the safety net for families most in need."[8] What he doesn't mention is that the enforcement of these time limits was immediate and retroactive – giving some families virtually no time to prepare for the cut-off in assistance. There was very little help moving families to self-sufficiency – the motivation was money, as aptly described in a recent headline, "Welfare time limits save Michigan millions, but cost 32,090 families."[9]

This is not "success." Success would be a caseload decline resulting from families leaving welfare for work and ensuring that the policy is having positive effects on the state's neediest families with children. Shortly after the state adopted its "reforms" in October 2011, Ron French observed, "The reform instituted in Michigan's welfare system in October was unprecedented nationally. No other state had kicked so many people off assistance in such a short amount of time, with such little notice… How the approximately 15,000 families cut off from cash assistance are surviving, though, isn't as clear. We may never know. The state isn't monitoring the impact on those families, and social service agencies don't have a way to do it themselves."[10]

Under the pre-TANF waiver process, started by President Reagan, and continued by President George H.W. Bush and President Clinton, states were given flexibility, but there was accountability. In particular, they had to evaluate their reforms using the "gold standard" of evaluation – random assignment. TANF is a blank check with no accountability for serving poor families, connecting them to work, or how the funding is spent instead.

TANF as a Slush Fund in Michigan

Anyone can cut caseloads by kicking people off welfare – that has nothing to do with helping them escape poverty. In the last 20 years, Michigan cut its TANF cash assistance caseload by 80 percent, even as poverty rose, and it does little to connect families to work opportunities. In FY 2014, Michigan spent just 19 percent of total TANF/MOE funds on basic assistance, work activities, and child care.[11] Before TANF, nearly all AFDC-related spending was for one of these core welfare reform activities.

The Michigan experience illustrates that TANF is not welfare or welfare reform – it is just flexible funding stream, or revenue sharing. Instead of spending its TANF/MOE funds on core welfare reform activities, Michigan has used federal TANF funds to supplant existing state expenditures and count third-party expenditures toward its MOE requirement to reduce its commitment to poor families.

Supplantation. Supplantation is the practice of states using *federal* funds to replace state spending on a program or activity. According to a 2001 report by the U.S. General Accounting Office (GAO), "Since 1998, Michigan has used TANF funds to replace about $126 million of state funds in a variety of state programs."[12] Sharon Parks of the Michigan League of Human Services estimated that by 2002, 20 percent of the TANF block grant was used to supplant existing state spending.[13] While supplantation is legal, it reduces the funding available for providing core TANF benefits and services.

As just one example, Kevin Koorstra, senior fiscal analyst for the nonpartisan House Fiscal Agency in Michigan, notes that "the state began to claim the financial aid programs funded through the Higher Education budget under TANF purpose 3 – to prevent and reduce the incidence of out-of-wedlock pregnancies."[14] There is little credible empirical data to suggest that such expenditures actually advance purpose 3 beyond simple correlations of educational attainment and out-of-wedlock births, but given the broad flexibility Congress provided and the limits it imposed on federal oversight, states have been claiming college scholarships and related higher education costs for over a decade.[15] Of course, for each dollar spent on this activity, there is a dollar less for needy families with children.

Counting existing third-party spending as MOE. More recently, Michigan has increased its reliance on third-party sources to meet its MOE requirement. Prior to FY 2008, 80 percent of Michigan's MOE came from its expenditures on FIP [the Family Independence Program] cash assistance and child care. Koorstra explains that beginning in FY 2008, MOE claims rose "as a result of the state's efforts to identify additional existing programs and services…"[16] Two examples illustrate the way state flexibility can be used (some would say "abused") to generate increased MOE spending in ways that allow a state to cut back on its own commitment to the program, freeing up state dollars to be spent on any purpose – TANF-related or not.

First, the state began claiming as MOE a greater percentage of K-12 spending for "School Readiness and At-Risk programs," presumably because such expenditures advance purpose 3 (reducing out-of-wedlock pregnancies). Koorstra explains: "The state TANF MOE increase is more the result of the state's efforts to identify more MOE-eligible spending than an actual increase in spending for these programs. State TANF MOE claimable spending increased from 21% of gross School Readiness and At-Risk expenditures in FY 2005 to 56% in FY 2011."[17] His analysis shows that this category now accounts for about half of Michigan's required MOE. He notes that before FY 2010, the state only claimed the amount of such expenditures in excess of the FY 1995 level in recognition of the "new spending test" for MOE expenditures. (This is a provision that was intended to prevent supplantation.[18]) However, now the state claims the entire amount, based on the advice of a consultant:

> After consultation with an outside vendor, the state determined that the current programs were different enough when compared to the FY 1995 programs that they could be categorized as new programs rather than existing programs and therefore the calculation [of "new spending"] was no longer required, which generated additional TANF MOE claims.[19]

Second, the state "entered into memorandums of understanding (MOUs) with non-state entities that would allow the state to claim TANF MOE on the TANF eligible programs and services that those entities administer."[20] Maura Corrigan, former Director of the Michigan Department of Human Services, explains that the state hired a consultant to find additional countable expenditures:

> In order to maximize TANF MOE spending and avoid these penalties [penalties for failing to meet TANF's basic MOE requirement], DHS contracted with the Public Consulting Group (PCG) on a contingency fee basis to assist the state in meeting the basic Fiscal Year 2010 TANF MOE requirement. PCG employed numerous strategies in this effort including assisting with claims for refundable earned income credit payments, Early Childhood Investment Corporation expenditures, United Ways and 211 expenditures, independent foundation expenditures, and TANF eligible programs operated by the county of Wayne.[21]

This simply counts as state MOE the spending of third-party non-governmental entities and does nothing to help low-income families. In fact, to the extent that it allows the state to spend less of its own money on core welfare reform purposes, it undermines the goals of welfare reform. Most observers do not believe these expenditures are consistent with the original intent of the 1996 law. The July House Ways and Means Committee draft reauthorization bill would have eliminated the counting of third-party non-governmental expenditures; the most recent congressional action allows states that have engaged in this practice to continue at current levels.

Bottom-line. Michigan has done everything it can to avoid spending money on needy families. It uses federal funds to supplant state funds and fill budget holes. And, in terms of fulfilling its MOE requirement, the state has done all it can to count existing state expenditures and even the expenditures of non-governmental third-parties. This is not "welfare reform"; this is not a "success"; this is ***Truly a National Failure (TANF).***

TANF Work Requirements Don't Work in Michigan

Congress itself gutted work requirements in 1996 in enacting TANF, creating a myriad of loopholes. Michigan is a prime example of the failure of conservative policy-making, at least as reflected in TANF's "work requirements." In FY 2012, Michigan achieved an overall work participation rate of 43.1 percent, exceeding its target rate of 37.5 percent (the 50 percent statutory rate reduced by a 12.5 percent caseload reduction credit).[22] Michigan was only able to meet TANF's work rate and avoid potential federal penalties by taking advantage of a number of loopholes, which artificially reduced its denominator, artificially inflated its numerator, and artificially inflated its caseload reduction credit and thus lowered its target rate. (For a more comprehensive discussion of TANF's congressionally-created work requirement loopholes, see "TANF Work Requirements: An Epic Fail," in *TANF is Broken!*)

Artificially reducing the denominator. As described above, Michigan has used federal TANF dollars to supplant state dollars and has counted pre-existing state spending as MOE. Both practices free up state dollars for the creation of what is known as the "solely state funded" (SSF) program – a funding stream outside the TANF/MOE structure and hence not subject to any of its requirements. Many states have created solely state funded programs for families that are unlikely to have enough hours of activity to count towards TANF's work participation rates. For example, Michigan created such a program for cases "in which an adult is incapacitated greater than 90 days." Koorstra explains the rationale: "The state created this state-funded FIP group so that those cases would not count against the federal work participation rate, since these recipients historically had difficulty meeting federal work participation requirements. This policy did not change gross spending for FIP, but did reduce how much gross spending is TANF [or MOE] funded."[23] The state did the same thing for two-parent families to avoid the more challenging two-parent work requirement (90 percent). In FY 2012, there were a total of 13,371 SSF cases (two-parent cases and cases with an incapacitated adult) that effectively were exempted from TANF's work requirements because of this loophole, representing nearly one-quarter of the state's combined TANF/SSF average monthly caseload of 59,653.[24] This is a direct result of the block grant structure of the TANF program.

Artificially inflating the numerator. One increasingly common loophole states take advantage of to meet TANF's work rates is paying a token benefit to families with children that have enough hours of employment to count in the work rate. Many states pull these families from the SNAP caseload and pay them a small amount, e.g., $10 a month. Michigan does something similar, but it takes these cases from families that would otherwise leave welfare for work. It continues them on the rolls for an additional six months as "extended FIP" or EFIP cases. The state's policy guidance explains this as follows:

> The DHS will provide a payment of $10 per month for six months to individuals whose FIP case would have otherwise closed due to earnings, **if those individuals continue to meet federal work participation requirements**…[emphasis in original document][25]

The added $10 payment is just a low-cost way for the state to boost its work rate by counting people who would otherwise have been off cash assistance and working anyway.

As a result of EFIP and a relatively generous earnings disregard, over 60 percent of the families included in the numerator of the work rate were in unsubsidized employment in FY 2012. The next most common activity was job search and job readiness assistance (typically a low-cost activity), followed by vocational educational training and community service, though the number of families in these activities was quite small. The state spent just 5 percent of its TANF/MOE funds on work activities in FY 2012 (and this percentage has not exceeded 7 percent since FY 2002).[26]

Using "excess MOE" to inflate the caseload reduction credit. The 1996 law required that states meet certain work participation requirements. The overall work rate requires that at least 50 percent of TANF families with an adult (now work-eligible individual) engage in specified work activities; for two-parent families this requirement is set at 90 percent. The caseload reduction credit reduced these targets to the extent sates lowered caseloads below FY 1995 levels (changed to FY 2005 starting in FY 2007) compared to a "comparison year" caseload – the year prior to the year for which work rates are measured. In addition, a regulatory provision allowed states to reduce their comparison year caseload by spending in excess of their basic MOE requirement. (Note: While this is a regulatory provision, it is only possible because Congress replaced the federal-state match with a block grant and a separate MOE requirement. The concept of "excess MOE" or "third-party MOE" would not exist in a federal-state matching program.) Specifically, the "excess MOE" provision allows a state that is investing state MOE funds in excess of its basic MOE amount to include only the pro rata share of caseloads receiving assistance that is required to meet basic MOE requirements. This led many states to simply find more third-party spending to count as MOE, including third-party nongovernmental expenditures, just to artificially inflate the caseload reduction credit.

Michigan is no exception. For the FY 2012 caseload reduction credit, the state reported MOE expenditures of more than $210 million in excess of its basic MOE requirement, which according to the state's calculations would remove 11,356 cases from the average monthly comparison year caseload.[27] Because Michigan's caseload remained about the same between FY 2005 and FY 2011 (the comparison year for the FY 2012 caseload reduction credit), after accounting for eligibility changes,[28] it appears that all or nearly all of the caseload reduction credit for the FY 2012 rate was derived by excess MOE, reducing the state's target from 50 percent to 37.5 percent. As described above, the state didn't actually spend more to achieve this reduction; it simply identified more state expenditures that met a TANF purpose so that it could count these expenditures just to reduce its target rate.

Cutting the caseload. The state's imposition of stricter time limits led to a sharp decline in its caseload. That too makes it easier for the state to meet work rates, both because it has a smaller caseload subject to such work requirements and presumably because cases that have been on the rolls long enough to meet a time limit are harder to serve and may need more intensive services than those who use TANF on a more temporary basis. Frances Carley, a fiscal analyst for the nonpartisan Senate Fiscal Agency, explains how this may have been one of the motivations for the strict time limits:

> The State did not achieve its actual target work participation rate in three years: 2007, 2008, and 2010. For example, Michigan's revised target rate in 2007 was 44.3% (and the State actually achieved a rate of just 28.0% that year). As a result, the DHS has already received notification that the State could possibly face both a $24.0 million and a $22.0 million fine for noncompliance in 2007 and 2008. The 2010 penalty could be as high as $25.0 million. By eliminating the hardship work exemption under TANF, the DHS expects to achieve greater success in meeting the target work participation rate in upcoming years.[29]

Time limits may serve a useful purpose in emphasizing the transitional nature of assistance, but they should be accompanied with meaningful welfare-to-work services and there should be a rigorous evaluation to test the impact of these and other policies. Michigan did neither.

Bottom-line. Many politicians talk about the importance of giving the poor a "hand up," rather than a "hand out." Where is the "hand up"?

Conclusion: The Gamers vs. the Vulnerable

In defending Michigan's time limit policy, Corrigan argues, "This is the vulnerable against the gamers. We have a fair number of people gaming the system. The gamers take away resources from the truly vulnerable."[30] While there may be some individuals who game the system, e.g., they work in the underground economy while also receiving assistance, there are others who have serious employment barriers. As LaDonna Pavetti of the Center on Budget and Policy Priorities notes:

> Families that reach time limits often have significant employment barriers (such as) caring for a child with a serious medical condition. When families are cut off without regard to their circumstances, we are denying families with very low chances of succeeding in the labor market the only stable source of support available to them.[31]

The responsible thing to do when enacting a drastic change would be to test it rigorously on a limited scale using a random assignment experiment, as was the policy before the 1996 law.[32] Then we could assess the impact of hard time limits (and other policies) on employment, welfare receipt, poverty, and other outcomes of interest. TANF did away with such evidence-based accountability.

While Corrigan's reference to "gamers vs. the vulnerable" is about families receiving cash assistance, a more apt reference would be one that reflects the state as the "gamer" and needy families as "the vulnerable." Michigan – like many states – uses TANF as a slush fund to supplant state expenditures and fill budget holes while spending less and less on TANF's core welfare reform purposes. As noted above, only 19 percent of TANF/MOE expenditures in Michigan in FY 2014 went to cash assistance, welfare-to-work activities, and child care. Indeed, it seems like the state is the one that has a problem with dependency – dependency on the federal government for nearly $800 million a year. And, the state totally gamed the federal work requirement in FY 2012 – using solely state funded programs to reduce its denominator, paying token benefits ($10 a month) to those leaving welfare for six month to inflate their numerator, and seeking out third-party funding sources to inflate its MOE expenditures to qualify for a larger caseload reduction credit (and thus lower its target work rate). Without these gimmicks, the state would have failed to meet the federal work requirement. Instead of the gimmicks, the state could have spent more than 5 percent of its FY 2012 TANF/MOE expenditures on work programs to at least give vulnerable families a chance at self-sufficiency.

Speaker Ryan: Is this really "fixing" a program? Is this really a model to be emulated? TANF is a massive policy failure; it is time to start over! As you yourself said, "Those who protect the status quo must answer to the 46 million Americans living in poverty."[33]

[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 consider myself 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] Statement of John Engler, President of the Business Roundtable, before the Committee on Ways and Means, U.S. House of Representatives, Hearing on "Moving Families Forward: Setting Priorities for Reducing Poverty and Expanding Opportunity," May 24, 2016, available at: http://waysandmeans.house.gov/wp-content/uploads/2016/05/20160524FC-Testimony-Engler.pdf.

[3] Speaker Paul Ryan, "#ConfidentAmerica: Full Text of Speaker Ryan's Remarks at the Library of Congress," December 3, 2015, available at: http://www.speaker.gov/press-release/full-text-speaker-ryans-remarks-library-congress.

[4] This document elaborates on some of TANF's most serious weaknesses as they apply to Michigan. It does not focus on TANF's early years during Governor Engler's tenure, because the governor negotiated a great deal for himself and other governors at that time. In fiscal year (FY) 1996, the year before TANF was implemented in Michigan, the state spent $581 million in federal funds. Its block grant is $775 million, because it was based on historic spending levels, so it got a windfall of about $200 million just based on the FY 1996 spending level. However, because of inflation and the recent economic downturn, this once great deal for the state has soured.

[5] All figures from, Center on Budget and Policy Priorities, "Michigan: TANF Caseload and TANF-to-Poverty Ratio Fact Sheet," October 27, 2015, available at: http://www.cbpp.org/research/state-fact-sheets-trends-in-state-caseloads-and-tanf-to-poverty-ratios.

[6] Center on Budget and Policy Priorities, "How TANF and MOE Dollars Were Spent in Michigan over Time," 2015, available at: http://www.cbpp.org/sites/default/files/atoms/files/tanf_spending_mi.pdf.

[7] Terry Jones, "Michigan Shows Strong Economy Is Key to Welfare Reform," *Investors.com*, November 19, 2015, available at: http://news.investors.com/blogs-capital-hill/111915-781653-welfare-reform-works-best-when-economy-is-growing.htm.

[8] *Ibid.*

[9] Emily Lawler, "Welfare time limits save Michigan millions, but cost 32,090 families," April 5, 2016, available at: http://www.mlive.com/news/index.ssf/2016/04/saving_dollars_not_people_chan.htmlhttp://www.mlive.com/news/index.ssf/2016/04/saving_dollars_not_people_chan.html.

[10] Ron French, "Welfare reform leaves families without a net, and off the radar," *Bridge*, February 2, 2012, available at: http://bridgemi.com/2012/02/welfare-reform-leaves-families-without-a-net-and-off-the-radar/.

[11] Center on Budget and Policy Priorities, "Michigan: TANF Spending Fact Sheet," October 2, 2015, available at: http://www.cbpp.org/sites/default/files/atoms/files/tanf_spending_la.pdf.

[12] U.S. General Accounting Office, Challenges in Maintaining a Federal-State Fiscal Partnership, August 2001, p. 100, available at: http://www.gao.gov/products/GAO-01-828.

[13] Cited in Kent County Family and Children's Coordinating Council meeting minutes, April 16, 2002.

[14] Kevin Koorstra, "Temporary Assistance for Needy Families (TANF)," *Fiscal Focus*, November 2012, available at: http://www.house.mi.gov/hfa/PDF/HumanServices/Fiscal_Focus_TANF.pdf.

[15] See, for example, New York's *Annual Report on State TANF and MOE Programs – 2004*, submitted by Robert Doar to Secretary Tommy Thompson, December 31, 2004, available at: http://archive.acf.hhs.gov/programs/ofa/data-reports/MOE-04/newyork.htm.

[16] Kevin Koorstra, "Temporary Assistance for Needy Families (TANF)," *Fiscal Focus*, November 2012, available at: http://www.house.mi.gov/hfa/PDF/HumanServices/Fiscal_Focus_TANF.pdf. One of the reasons that states boost their MOE is to qualify for the Contingency Fund, which, among other requirements, requires a state to increase its MOE expenditures from at least 75 to 80 percent of historic spending to more than 100 percent. Another reason for increasing MOE expenditures is to increase the size of the "excess MOE" adjustment for the caseload reduction credit.

[17] *Ibid*.

[18] While TANF has no ban on supplantation with federal TANF funds, it does prohibit supplantation with MOE dollars. However, the ban is not particularly effective and can be administratively burdensome and is part of what is known as the "new spending test." State and local governmental expenditures on programs that existed in 1995 and were not part of the state's AFDC and related programs can be claimed only be claimed as MOE to the extent that

they are higher than the spending in 1995. In other words, only new spending counts. Of course, since that level is not adjusted for inflation, over time states can count preexisting spending that rises simply because of inflation. In effect, this permits supplantation with MOE funds as well. In this case, Michigan seems to have taken expenditures that were similar, but argued that changes to the programs were sufficiently broad as to make them different programs and thus "new" expenditures.

[19] Kevin Koorstra, "Temporary Assistance for Needy Families (TANF)," *Fiscal Focus*, November 2012, available at: http://www.house.mi.gov/hfa/PDF/HumanServices/Fiscal_Focus_TANF.pdf.

[20] *Ibid*.

[21] Letter from Maura Corrigan, Director, Michigan Department of Human Services, to the Honorable Bruce Caswell, Chair, Senate Appropriations Subcommittee on DHS and the Honorable David Agema, Chair, House Appropriations Committee on DHS, February 23, 2011, available at: https://www.michigan.gov/documents/dhs/TANF_MOE_sources_348466_7.pdf.

[22] This analysis was conducted in November 2015 before the FY 2013 work participation rate data were released. The use of some of the gimmicks described here has declined in subsequent years, mainly because the state slashed its caseload by removing so many families.

[23] Kevin Koorstra, "Temporary Assistance for Needy Families (TANF)," *Fiscal Focus*, November 2012, available at: http://www.house.mi.gov/hfa/PDF/HumanServices/Fiscal_Focus_TANF.pdf.

[24] Information on the magnitude of SSF programs can be found in state caseload reduction credit reports, because any shift of families from TANF-MOE to a SSF is considered an eligibility change and cannot be used in the calculation of the caseload decline for purposes of the credit. In Michigan, the use of the SSF loophole to boost its work participation rate was not an isolated instance; it has used such programs since FY 2007. For more information, see Michigan Department of Health and Human Services, "TANF Caseload Reduction Reports," for FY 2006-FY2015, available at: http://www.michigan.gov/mdhhs/0,5885,7-339-73970_61179_8366-22439--,00.html.

[25] Memo from Liza Estlund Olson, Director, Workforce Development Agency to Michigan Works! Agency (MWA) Directors, "BWT/Workforce Development Agency, State of Michigan (WDASOM) Policy Issuance (PI): 06-34, Change 10," June 30, 2011, available at: https://www.michigan.gov/documents/dleg/delegjet06242010kbl03_325740_7.pdf.

[26] Center on Budget and Policy Priorities, "How TANF and MOE Dollars Were Spent in Michigan over Time," 2015, available at: http://www.cbpp.org/sites/default/files/atoms/files/tanf_spending_mi.pdf.

[27] See Michigan, ACF-202 TANF Caseload Reduction Credit Report for FY 2012, December 14, 2011, available at: http://www.michigan.gov/documents/dhs/DHS-TANF-2012_371464_7.pdf.

[28] Eligibility changes made since FY 2005 cannot be considered in the calculation of caseload declines.

[29] Frances Carley, "The Family Independence Program (FIP): 48 - Month and 60 - Month Time Limits.," *State Notes*, Fall 2011, available at: http://www.senate.michigan.gov/sfa/publications%5Cnotes%5C2011notes%5Cnotesfal11fc.pdf.

[30] Paul Egan, "No fallout after welfare cutoff, state testifies, but advocacy groups skeptical," *Detroit Free Press*, February 12, 2012, available at: http://www.freep.com/article/20120223/NEWS15/202230484/No-fallout-after-welfare-cutoff-state-testifies-but-advocacy-groups-skeptical.

[31] Ron French, "Welfare reform leaves families without a net, and off the radar," *Bridge*, February 2, 2012, available at: http://bridgemi.com/2012/02/welfare-reform-leaves-families-without-a-net-and-off-the-radar/.

[32] Judith M. Gueron and Howard Rolston, *Fighting for Reliable Evidence* (New York, NY: Russell Sage Foundation, June 2013).

[33] Paul Ryan, "The GOP Plan to Balance the Budget by 2023," *The Wall Street Journal*, March 12, 2013, available at: http://www.wsj.com/articles/SB10001424127887323826704578353902612840488.