

CLASP

The Center for Law and Social Policy

To: Federal Interagency Council on Economic Mobility
From: Center for Law and Social Policy (CLASP)
Date: October 2, 2020
Re: Request for Information on Federal Coordination To Promote Economic Mobility for All Americans

Thank you for the opportunity to provide input to inform the development and establishment of a federal interagency Council on Economic Mobility.

The Center for Law and Social Policy (CLASP) is a national, nonpartisan, nonprofit organization advancing policy solutions for people with low incomes. For 50 years, our deeply knowledgeable staff has lifted up the voices of children, families, and individuals with low incomes; equipped advocates and organizers with policy ideas that work; built coalitions and partnerships to advance a bold vision; and helped public officials put effective policies into practice.

CLASP works to develop and implement federal, state, and local policies (in legislation, regulation, and on the ground) that reduce poverty, improve the lives of people with low incomes lives, and creates pathways to economic security for everyone. That includes directly addressing the barriers people face because of race, ethnicity, and immigration status. We also fight back against harmful proposals as well as political attacks on effective policies and investments.

Below we respond to many of the individual questions asked in the July 16 Request for Information. In many cases, we provide a list of key publications, both those developed by CLASP and those written by other experts, that we recommend the Council consult in its work.

We would be pleased to discuss any of these responses with Council staff. Please contact Elizabeth Lower-Basch, elowerbasch@clasp.org with any questions.

1. What priorities would you identify for the new federal Council on Economic Mobility?

Including the voices of people with low-incomes and people who are paid low-wages.

We strongly believe that a Council on Economic Mobility must include the voices of people with low incomes and people who are paid low wages. Successful anti-poverty work necessarily includes the direct participation of people with lived experience. This is true both because it is impossible to fully understand the reality of poverty and mobility without the expertise brought by lived experience, and because being listened to and having one's participation valued is itself a critical element of mobility. Consulting advocates such as ourselves, service providers, and academic researchers is important, but not sufficient. While the saying "nothing about us, without us" comes from the disability rights movement, it is a critical principle across agencies and policy areas.

Although this Request for Information (RFI) states that HHS and interagency partners seek to gather feedback from the "people that we serve," nothing in the questions presented is targeted towards individuals who are personally experiencing barriers to economic mobility. Not only should they be present in the operations of the council once operational, they must also be included in the foundational

conversations and feedback mechanisms used to gather input as the council is created. Moreover, even if such questions were included, it is unrealistic to expect to engage people directly experiencing poverty through the mechanism of a *Federal Register* posting. The Council should begin with a review of best practices for truly incorporating the voices of people with lived experiences, and provide participating agencies with guidance and support on implementing such practices in their work.

Recommended readings:

- [Our Ground, Our Voices | CLASP](#)
- [Multidimensional Aspects of Poverty Research](#), ATD Fourth World.

Taking a systemic approach to understanding mobility

Too often, mobility is seen as something that individuals or families do or do not achieve. Many of the federal programs that are operated by the agencies that are participating in the Council focus on providing basic need supports and workforce development services to individuals with low incomes.

However, mobility is better understood as the outcome of systemic processes. Many structural and systemic factors contribute to barriers to work and mobility. These include mass incarceration and the implicit biases in the criminal justice system; racism and discrimination; segregation and isolation; policy and investment failures in the K-12 and postsecondary systems; and major gaps in access to and in investment in crucial supports for work, including child care, health, and behavioral health. These factors have their roots in systems of power. Systems of power are the beliefs, practices, and cultural norms on which individual lives and institutions are built. They are rooted in social constructions of race and gender and are embedded in history (colonization, slavery, migration, immigration, and genocide) as well as present-day policies and practice.

For example, Raj Chetty and fellow researchers have compiled [compelling and dramatic longitudinal data](#) that highlight the extent to which the city and the neighborhood in which children grow up shape their chances of climbing the income ladder compared to their parents. Even looking at mobility in terms of individual earnings gains, data based on linked household and employer records show that the difference between a worker whose earnings increase over time and one whose earnings stagnate is as much a function of their employer as of their own characteristics.

Recommended readings:

- [Eliminating Barriers to Employment, Opening Doors to Opportunity](#), Testimony of Kisha Bird, CLASP, before the US House of Representatives, Committee on Education and Labor
- [Improving Economic Opportunity in the United States](#), Testimony of Jared Bernstein, Center on Budget and Policy Priorities, Before the Joint Economic Committee
- [Economic Mobility in the United States](#), Pew Trusts
- [Moving Up or Moving On](#), Frederick Andersson, Harry J. Holzer, and Julia Lane.

Focus on racial disparities and their root causes.

A federal council on Economic Mobility must explicitly and intentionally focus on racial disparities and root causes of those racial disparities. Differences in economic outcomes by race have persisted for centuries and intergenerational mobility continues to vary significantly across racial groups. Reducing racial disparities will require reducing intergenerational gaps for Blacks, American Indians, and other communities of color. To overturn decades of white supremacy, we must [build a new vision of community investment](#). An anti-racist approach to promoting economic mobility requires us to dismantle racist

structures and address the root cause of racial disparities in economic mobility. Economic reform efforts must be focused on communities of color who have been most impacted by discriminatory policies such as redlining and over policing, which perpetuate cycles of poverty. An anti-racist approach means ensuring that Black and Brown communities have full access to quality jobs, educational opportunity, and health care.

We strongly recommend that the Department of Justice (DOJ) participate in the Council. DOJ already supports multiple programs that are aimed at improving the economic well-being of people who are under the supervision or have previous involvement with the justice system. More fundamentally, the rise of mass incarceration and the carceral state is both a cause and an outcome of wealth and income disparities by race.

Recommended readings:

- [Race and Economic Opportunity in the United States: An Intergenerational Perspective](#), Opportunity Insights
- [Economic Mobility of Black and White Families](#), Julia Isaacs, Brookings..
- [A Wealth of Inequalities: Mass Incarceration, Employment, and Racial Disparities in U.S. Household Wealth, 1996 to 2011](#), Bryan L. Sykes and Michelle Marato.
- [Structural Racism](#), Kilolo Kijakazi et al. Urban Institute.

2. As a state, community, or provider, what are your suggestions for how to make federal workforce and work support programs work better together in your state or community at this time and in the long-term? Please share any examples of effective federal program coordination.

Several programs have effective existing models for using information collected by one public benefit program to help enroll people for other benefits for which they qualify. This makes programs more efficient and reduces hassles for struggling families. In some cases, a program can use another program's eligibility determination to eliminate a duplicative process, automatically deeming a person as eligible based on their participation in another program. In other cases, where Congress has not allowed this flexibility, a program can still use data (such as income) that another trusted program has collected and verified to reduce burdens on state and local administrators and enable applicants to avoid having to provide the same paperwork to multiple offices. Minimizing the required amount of paperwork reduces the cognitive costs of participating in public benefit programs for recipients, which helps reduce poverty according to behavioral science researchers. These are called different names in different programs, such as Express Lane eligibility, direct certification, and adjunctive eligibility.

Recommended readings:

- [Improving Access, Cutting Red Tape](#), Elizabeth Lower-Basch, CLASP
 - [Work Support Strategies Initiative: 12 Lessons on Program Integration and Innovation](#), Cemere James, CLASP
 - [Opportunities for States to Coordinate Medicaid and SNAP Renewals](#), Jennifer Wagner and Alicia Huguelet, CBPP.
 - [Moving to 21st Century Public Benefits: Emerging Options, Great Promise, and Key Challenges](#), Elizabeth Lower-Basch, CLASP, and Stan Dorn, Urban Institute.
 - [Poverty Interrupted: Applying Behavioral Science to the Context of Chronic Scarcity](#), Allison Daminger, Jonathan Hayes, Anthony Barrows, and Josh Wright, ideas42
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3. As a state, community, or provider, what do you think are the immediate barriers preventing federal workforce and work support programs from collaboration in your state or community? What are the long-term barriers?

In the early 2000s, CLASP, the Hudson Institute and the National Governors Association undertook a detailed analysis of several key areas in which states were interested in service integration in order to understand the barriers that prevented such integration. In spite of the passage of time, this remains deeply relevant to today's programs. This study found that there were significant opportunities to create comprehensive application forms and harmonize reporting, verification and recertification requirements across benefit programs. As discussed in the answer to question 2, many of these changes have now been implemented by numerous states. In the area of comprehensive family services (child welfare), they found that the primary obstacles were not legal requirements, but the challenges of bringing together multiple entities and funding streams in a coordinated fashion. And in the area of aligning Temporary Assistance for Needy Families (TANF) and Workforce Investment Act (WIA), they found many fundamental differences flow from deliberate Congressional choices, particularly the difference between outcome measures under WIA and the process measure (the work participation rate) used under TANF. In spite of the changes made under the most recent reauthorization of the Workforce Investment and Opportunity Act (WIOA) to encourage program alignment, these fundamental differences remain.

Recommended readings:

- [The opportunities for service integration under current law](#), Mark Greenberg and Jennifer Noyes. Synthesis of:
 - [Integrating TANF and WIA into a Single Workforce System: An Analysis of Legal Issues](#), Mark Greenberg and Abby Frank, CLASP.
 - [Providing Comprehensive, Integrated Social Services to Vulnerable Children and Families: Are There Legal Barriers at the Federal Level to Moving Forward?](#) by Rutledge Hutson, CLASP.
 - [Aligning Policies and Procedures in Benefit Programs: An Overview of the Opportunities and Challenges Under Current Federal Laws and Regulations](#) by Sharon Parrott and Stacy Dean, CBPP.
- [Coordinating TANF & WIOA: High Interest, Slow Progress During Early Days of WIOA](#), Anna Cielinski, CLASP.

4. How can federal agencies collaborate and coordinate to help program operators foster participant economic mobility, recovery, and resilience, using administrative authorities such as joining communications, technical assistance, and program guidance? What are specific examples based on your experience?

Although cross-enrollment can simplify administration and improve access, the rules are specific and can be hard to navigate across multiple programs. For example, an administrator of a child care, energy assistance, or Medicaid program may not be aware of all of the available connections across health and human services programs in the state or community. We strongly recommend that Council identify and strengthen cross-enrollment opportunities. Several resources are available to support this work. As a starting point, The Center on Budget and Policy Priorities has [created a guide](#) to help policymakers and program officials identify opportunities under federal law to streamline the application and enrollment process by relying on eligibility determinations made by other programs.

ACF's support of [Interoperability](#) has been a helpful resource for human services providers. The [Confidentiality Toolkit](#) is an example of a useful resource provided by the federal government to support

service integration. In particular, sample materials that have been vetted by federal agencies and can be adapted for state or local use can save agencies significant amounts of time.

A powerful role that federal agencies can play is supporting cross-state information sharing. For example, this spring many states scrambled -- and struggled -- to implement Pandemic-EBT, a brand new program that required data sharing between state human services agencies and local school districts. The federal agencies provided essentially no support to states on how to do this, or the range of models that emerged. While advocacy organizations have worked to fill the gap, providing [a resource library on P-EBT](#), the lack of federal guidance and information sharing delayed the delivery of critical nutritional supports to children in a time of crisis.

5. How are program cliff effects and high effective marginal tax rates impacting the economic mobility of individuals and families in our community? What methods are being used to address these challenges?

While some programs do have cliff effects, it's important to recognize that, [as recent ASPE analysis shows](#), relatively few people experience high effective marginal tax rates. However, confusion about eligibility rules -- and the difficulty of regaining access to benefits that are capped, such as child care and housing subsidies, if they are lost -- does generate fears about cliff effects that may have negative effects. In addition, because the Earned Income Tax Credit (EITC) and refundable Child tax Credit (CTC) are not accessed by families until the following tax filing season, families entering employment may see immediate drops in benefits well before they access the tax credits that will leave them better off. A periodic payment mechanism for these credits might significantly reduce the short-term losses that families experience.

States have significant ability to reduce cliff effects through program design. Parents turning to work in states that have not expanded Medicaid do face a real cliff effect when their earnings exceed the Medicaid eligibility limits but are still below the ACA subsidy threshold. For example, in North Carolina, adults who earn from \$737 to \$1,674 a month for a family of three currently [fall in the coverage gap](#). If North Carolina expanded Medicaid, an increase in income would not lead to loss parents would not risk losing health insurance coverage. In SNAP, states can significantly reduce the cliff effect by raising gross income limits using broad based categorical eligibility. States have full ability to set their TANF and CCDBG parameters, but because these are capped funding streams, there is an immediate tradeoff between slowing the phase-out of benefits and having more funds for other purposes, including serving families with lower incomes.

Recommended readings:

- [Raising the Minimum Wage Leads to Significant Gains for Workers, Not to 'Benefits Cliffs'](#), Yannet Lathrop, NELP.
- [From Rhetoric to Reality: What it Takes for Public Benefits to Work Better for Workers](#), Carrie Welton, CLASP.
- [Testimony on Work Incentives and the Safety Net](#), Olivia Golden, CLASP.

6. What kind of federal operational systems -- such as data interoperability, grant, and contract mechanisms -- would make it easier to meet your goals related to economic mobility?

Integrated eligibility systems

The Council should strongly consider restoring and expanding the previous waiver of A-87 cost allocation requirements to support the development and improvement of integrated eligibility and enrollment systems. While this was in effect, it greatly contributed to the [development of systems](#) that allow people to apply for and renew eligibility for multiple programs. However, the timeline for development of such systems is long, and many states have unfinished projects or have only added some of the programs that could potentially be included. A new version of this waiver should not be limited to services needed by Medicaid, but should include all activities where improving the functioning of an existing system would be cheaper and more effective than development of a siloed system for another program.

The federal government should provide technical assistance to states on scoping and procuring technology systems, and support cross-state learning on best practices. The federal government should also explore mechanisms for enhancing states' ability to re-use systems developed for other states rather than having to pay for similar systems in each state.

Recommended readings:

- [States' Use of Technology to Improve Delivery of Benefits: Findings from the Work Support Strategies Evaluation](#), Urban Institute
- [Enhanced Human Services Systems Improvement Under the Cost Allocation Waiver](#), HealthTech Solutions

Transparency and learning regarding pay for success projects

"Pay for success" contracts have drawn significant attention as a possible mechanism to draw additional funding to prevention-focused models that have the potential to improve long-term outcomes and save money. In particular, they are seen as a way to address the "wrong-pocket" problem, where many of the savings from investments in social services are realized as reduced medical or incarceration costs. However, such models also have many potential issues, including additional costs above those incurred under traditional grants or contracts (particularly when private investors are seeking returns) and concerns that outcome-based measures can be manipulated by creaming of participants.

The Social Impact Partnerships to Pay for Results Act (SIPPPRA) was enacted in February 2018 with \$100 million in appropriations, and a Notice of Funding Availability was published in February 2019. The last meeting of the [Commission on Social Impact Partnerships](#) about which information is available on their website was October 2019. Treasury should immediately post updated information on the status of these proposals, and should work with the Council to collect and post information on the cost, target populations, outcomes and payment points, and results so far of any other pay for success contracts supported by federal agencies.

Recommended readings:

- [Social Impact Bonds: Overview and Considerations](#), Elizabeth Lower-Basch, CLASP.

- 7. What are the most significant challenges that prevent participants/recipients of federal workforce, work support, and housing programs from fully participating in such programs? Do these challenges present obstacles for participants in meeting their economic and employment goals? For example, are there barriers related to child care, transportation, health, disability, caring for a family member, substance use disorder, etc.?**
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Bureaucracy, confusing paperwork, and complex regulations often introduce delay and frustration into experiences with government agencies. Administrative burdens also diminish the effectiveness of public programs. In a 2018 book, scholars Pamela Herd and Donald Moynihan identify three components of [administrative burden](#)-- learning costs, compliance costs, and psychological costs. Research and experience shows that compliance costs are a significant factor in limiting access to workforce and work support programs; public education or outreach efforts without application assistance or streamlined processes have been shown to have limited effects on participation. Increased requirements associated with eligibility determinations and renewals in work support programs frequently lead to decreases in coverage among eligible people due to difficulties completing processes and providing documentation. Moreover, the people who are experiencing scarcity, health problems, such as having a disability, and overall crisis, and thus need assistance the most may be the least well positioned to overcome these burdens.

Both students and program administrators frequently name unmet child care needs, housing insecurity or homelessness, hunger, transportation, and inadequate access to broadband internet as barriers to completion of education and training programs.

Recommended readings:

- [Recent Medicaid/CHIP Enrollment Declines and Barriers to Maintaining Coverage](#), Kaiser Family Foundation
- [Job Training and Community College Administrators Say Supportive Services are Key to Program Completion, but are Not Adequately Funded](#), IWPR.
- [Human Capital and Administrative Burden: The Role of Cognitive Resources in Citizen-State Interactions](#), Christensen et al.

8. How can federal agencies better work together to help participants, including those facing multiple barriers, overcome these barriers in the short term and achieve economic mobility and resilience in the long term?

First, as discussed above, it is important to recognize that many “barriers” are in fact reflections of systemic disadvantages, and that it is critical to address structures of disadvantage at the national, state and community level, rather than treating them as barriers that individuals should be expected to overcome.

Second, agencies must recognize that the nature of today’s low-wage work means that a broad range of workers are paid low wages, and therefore they and their families have need of the assistance provided by SNAP, Medicaid, child care and housing benefits, and the refundable tax credit. Policies should not assume that all individuals who need financial supports require intensive non-financial assistance as well.

Some workers and families do need more intensive services. Estimates of the share of families that have experience with multiple co-occurring challenges such as health and mental health problems, very low education and skills, and homelessness, range from one in ten to perhaps one in four among the broader group of struggling low-income families, depending on what is counted. Pregnant women and families with infants under one year old are disproportionately represented among the most vulnerable and most deeply poor families--including families experiencing homelessness-- as well as among the broader group of poor and low-income families. Researchers have identified a number of features of programs that are successful for highly vulnerable individuals and families that face multiple challenges. These include:

- services that are intensive, high quality, and available over a long time (including approaches such as career pathways that allow individuals to enter and exit based on opportunities or crises in their lives);

- access to income support that meets basic needs and stabilizes their lives while they are receiving other help (including “earn while you learn” strategies such as subsidized jobs);
- access to health and mental health treatment;
- two-generational approaches that target both children’s and parents’ needs;
- and a well-trained case manager who can provide help in the context of a trusting relationship, but only if they have small enough caseloads to build individualized relationships with clients, and adequate funding for concrete benefits and supportive services that families need.

The last point is important: case management is only supported by the research as a complement to—not instead of—high quality services and assistance to meet families' basic needs. Access to high quality health and mental health treatment, stable housing, adequate food, and quality child care provide the foundation upon which families can build in order to achieve economic security.

Recommended readings:

- [Testimony on Renewing Communities and Providing Opportunities through Innovative Solutions to Poverty Presented to the Committee on Homeland Security and Governmental Affairs](#), Olivia Golden, CLASP.

9. What federal rules do you wish had more flexibility? What flexibilities do you need to respond to economic crises?

One of the key lessons learned from the Work Support Strategies Initiative was that under the existing federal–state structure, states already had the power to make many of the key policy changes needed to streamline program delivery and improve access. When they set out to integrate policy across programs and make service more family centered, state leaders were often surprised to learn that many problematic policies were the result of state choices, not federal requirements. Often, what is most needed from the federal government is clear communication -- coordinated across the federal agencies -- about what is required and what is possible.

Since the emergence of the COVID-19 health and economic crisis, some states have made changes in policies that advocates have requested for years. For example, some advocates have repeatedly argued to their state administrators that SNAP applicants do not need to provide verification of terminated income – literally proof from an employer that a job ended (in most cases, states can electronically access wage information showing elimination of income). One state balked at this request for years, but when faced with the COVID-19 crisis, state administrators quickly made the change.

States have also sought and received critical federal waivers, such as allowing telephonic applications for SNAP even if the state does not have the systems needed to record and store a voice signature. These changes in policies can reduce the frequency of mandated in-person visits for recipients and applicants of public benefit programs. Agencies offering online and telephone options can provide accommodation for recipients with transportation barriers, child care needs, and those who have physical disabilities. The federal government should examine which of these flexibilities can be continued and collect information from states on legislative changes that might be needed.

At the same time, it is important to recognize that automatic countercyclical funding is the single most critical flexibility that states need to respond to economic crises. In the absence of such funding, states are forced to cut services just when the need for them is most high. For example, in nearly all states, [TANF](#)

[cash assistance overwhelmingly failed to respond](#) to the increased need of the Great Recession, in spite of the Emergency Contingency Fund, while SNAP and other programs were far more responsive. Funding for WIA was increased by the American Recovery and Reinvestment Act (ARRA) but then [fell below pre-recession levels](#), even while unemployment and need remained high.

Recommended readings:

- [Reducing Red Tape Shouldn't Take a Crisis](#), Suzanne Wikle, CLASP.
- [Changing Policies to Streamline Access to Medicaid, SNAP, and Child Care Assistance: Findings from the Work Support Strategies Evaluation](#). Julia Isaacs et al, Urban Institute.

10. What do you wish government officials knew about your work?

[not answered]

11. What workforce and work support programs more easily align with others?

Because Temporary Assistance for Needy Families (TANF) and the Child Care Development Block Grant (CCDBG) eligibility rules are largely set by the states, they can be adjusted by states to reduce cliff effects and otherwise align with other programs. However, because these funding streams are capped and fall far short of meeting need, in practice states face challenging tradeoffs in using these funds.

As discussed under question 3, when TANF is considered as a workforce program, the fundamental difference between its participation rate measure and the outcomes measures used under WIOA creates a significant challenge to alignment.

There is significant overlap in eligibility and participation in SNAP and Medicaid. About three-quarters of households receiving SNAP benefits have at least one member receiving health coverage through Medicaid or the Children's Health Insurance Program (CHIP) and even more SNAP households may be eligible for one of those programs. This provides opportunities for states to coordinate their policies and processes to improve administration, customer service, and program participation. As explained in [this report from the Center on Budget and Policy Priorities](#), there are several mechanisms available for states to improve integration, streamline operations, and help eligible families keep their benefits at renewal.

Recommended readings:

- [Confronting the Child Care Eligibility Maze](#), Gina Adams, Urban Institute and Hannah Matthews, CLASP.

12. What are your suggestions for how to proactively support workforce preparation prior to an individual needing to participate in a federal workforce or work support program, such as programs focused on youth?

Youth and young adults

The millennial and post-millennial generation comprise over 40 percent of the current labor force. The overall economic viability of the nation depends on what happens to youth and young adults and their access to strong educational pathways, early work experience, and jobs that allow them to earn, learn, and progress. The high levels of unemployment for youth and young adults — driven by involuntary

disconnection from work, low wages, and inadequate hours when they are working — are harmful to the nation. Young people need early work experience — whether through summer jobs, college work-study, entry-level jobs out of high school, working at family-owned businesses, or volunteering—to gain readiness for future jobs and explore careers. Opportunity Youth are eager to work and continue their education but struggle to find jobs and programs that help them build better lives for themselves and their families.

Recommended readings:

- [Next Coronavirus package must do more for youth and young adults](#), Kisha Bird, CLASP, and Lashon Armado, Opportunity Youth United.
- [Eliminating Barriers to Employment, Opening Doors to Opportunity](#), Testimony of Kisha Bird, CLASP, before the US House of Representatives, Committee on Education and Labor
- [Employment Pathways for Boys and Young Men of Color: Solutions and Strategies That Can Make a Difference](#), Kisha Bird and Clarence Okoh, CLASP.

Children of immigrants

We also recommend investing in programs that help children in immigrant families thrive. One in four children in the United States have at least one immigrant parent. These children are our country's future doctors, lawyers, teachers, and engineers, but their ability to thrive is being threatened by anti-immigrant policies. Policies including worksite raids and family separation are causing economic hardship and harm to the physical and mental wellbeing of children living in immigrant families. Immigration policies being implemented now will have ripple effects on the lives and economic future of an entire generation of children and future workers.

Recommended readings:

- [Children in U.S. Immigrant Families](#), Migration Policy Institute
- [The Day That ICE Came: How Worksite Raids Are Once Again Harming Children and Families](#), Wendy Cervantes, Rebecca Ullrich, Vanessa Meraz, CLASP.
- [How The Trump Administration Has Harmed Immigrant Families and Children](#), Renato Rocha and Madison Allen, CLASP
- [Labor force growth increasingly depends on immigrants and their children](#), The Urban Institute
- [Preparing the Future Workforce: Early Care and Education Participation among Children of Immigrants](#), The Urban Institute

13. Are there existing workforce programs or strategies that have not historically been widely accessible to low income individuals and families that could help them achieve economic mobility, recovery, and resilience if they had better access to them? If so, please identify.

Subsidized employment programs, career pathways and pre-apprenticeship models are all important strategies for supporting workers' access to quality jobs. One step that the federal government could immediately take is to allow states to start implementing subsidized employment as a component of their SNAP Employment and Training program, as authorized by the 2018 Farm Bill.

We highlight that access to income is a critical element of these programs, as well as of mobility in general. People need to be able to meet their and their families' basic needs whether working, studying or caregiving. TANF cash assistance reaches a tiny share of the already limited population that is eligible for it. While WIOA funds can be used to provide need-based payments to people participating in training

programs, limited funding means that almost no workers receive such payments. And financial aid for postsecondary education leaves students with low-incomes, particularly students of color, with substantial unmet needs.

Child care is also critical to allow parents to participate in the workforce or in any sort of education or training program. However, paying for quality child care is a struggle for many parents, especially those with low incomes. CCDBG has steadily served fewer and fewer children over time and the program served an all-time low number of children—an average of 1.3 million per month—in 2017. Only 15 percent of eligible children under federal parameters have access to child care subsidies. This varies significantly by state and by race. According to our recent analysis, only 15 percent of eligible Black children were served nationally based on federal eligibility parameters. In most states, Latino and Asian children have far less access with just 2 percent of eligible Asian children and 4 percent of eligible Hispanic children served in CCDBG nationally.

Recommended readings:

- [Subsidized Employment Must Be a Part of the Recovery](#), Parker Gilkesson and Elizabeth Lower-Basch, CLASP
- [Subsidized Employment Programs: Goals and Design](#), Randi Hall, CLASP.
- [Defining On-Ramps to Adult Career Pathways](#), Judy Mortrude, CLASP.
- [Principles for a High-Quality Pre-Apprenticeship: A Model to Advance Equity](#), Noel Tieszen, Rosa Garcia, et al, CLASP.
- [When Financial Aid Falls Short: New Data Reveal Students Face Thousands in Unmet Need](#), Lauren Walizer, CLASP
- [CCDBG: Helping Working Families Afford Child Care](#), Stephanie Schmit, CLASP
- [Comments on Access to High Quality Child Care](#), CLASP

14. How does your program define and measure economic mobility? What data do you use?

[not answered]

15. Do you have recommendations for how to define and measure economic mobility that could be used across different programs?

Before attempting to develop a measurement of economic mobility that could be used across programs, it is important to clarify the goals of this effort. By definition, mobility is something that can only be directly measured over time -- years if not decades. While it is useful to measure mobility and understand the range of societal factors that contribute or undermine mobility, it is simply not possible to use economic mobility as an annual performance measure for a program.

While the goal of having consistent performance measures across programs is worthy, the details of such an approach are complicated and important. A few years ago, Congress considered (in a discussion draft of legislation that was released for public feedback but not formally introduced) applying measures based on the WIOA outcome measures to TANF. However, the drafters did not fully contemplate the [technical challenges](#) posed by the different concepts of program exit (eg.. an individual completing training versus a family stopping receipt of cash assistance) or by the time lags involved in collecting data on earnings after employment. The Council would have to take such challenges into account in designing any measure

of mobility that could be used across programs.

In addition, the extensive literature about performance-based contracting offers a number of cautionary lessons about unwanted side effects of attaching significant consequences to failure to achieve designed targets on outcome-based performance measures, even well-intentioned ones. Among the harmful consequences of tying high stakes to such measures are disincentives to serve the most needy populations (often referred to as “creaming” or “cream-skimming”), skewing services to focus on the selected outcomes of interest at the expense of other aspects of a program (“tunnel vision”) and winding up with programs that affect the measured indicators but not the underlying outcomes (“teaching to the test”).

Performance measures should therefore also include equity measures to reduce disincentives to serving participants with the highest needs and to ensure that providers have the resources needed to best serve these students, who may require more costly support to achieve economic security.

Recommended readings:

- [Comments on Proposed TANF Outcome Measures](#), Anna Cielinski and Elizabeth Lower-Basch, CLASP.
- [Equity Measures in State Outcomes-Based Funding](#), Duy Pham, CLASP.
- [Social Impact Bonds: Overview and Considerations](#), (discussion of performance measurement is on pages 16-19) Elizabeth Lower-Basch, CLASP.