Dear Chairman Kline and Chairman Camp,

On behalf of National Skills Coalition – a national coalition of business leaders, labor affiliates, community-based organizations, education and training providers, and public workforce officials—I am writing to express our strong opposition to your Committees’ approval of H.J. Res. 118, Providing for Congressional Disapproval of the Administration’s July 12, 2012 Waiver of Welfare Work Requirements.

The July 12, 2012 Information Memorandum (IM) issued by the Administration for Children & Families (ACF) at the Department of Health and Human Services (HHS) offers states the opportunity to develop “alternative and innovative strategies” under the Temporary Assistance for Needy Families (TANF) program to help “parents successfully prepare for, find, and retain employment.” To obtain a waiver, states must develop and submit a plan for a demonstration project that promotes employment entry, retention, advancement and access to jobs. Though a state that obtains waiver authority will be exempted from existing work participation standards, it will still be required to meet the goals and intent of welfare reform. HHS has stipulated that each waiver request approved must include an evaluation plan as well as interim performance measures that the state must track for the duration of the project. If a state fails to meet its performance targets, it must develop an improvement plan, and may face termination of the project.

Using waivers to expand states’ ability to experiment and improve their TANF programs is not a new policy proposal. During the 2005 TANF reauthorization debate, 29 Republican governors wrote to Senate Majority Leader Bill Frist, urging Congress to consider increasing waiver authority for the states. More recently, the governors of Utah and Nevada submitted extensive comments on TANF to HHS Secretary Sebelius, promoting waiver authority as a tool to increase employment in their states. Governors from California, Connecticut and Minnesota have also made inquiries regarding potential waivers.
HHS was clear in the IM that this waiver initiative is in no way meant to weaken or unwind the work requirements established in the 1996 welfare reform law. The IM states, “HHS will only consider approving waivers relating to the work participation requirements that make changes intended to lead to more effective means of meeting the work goals of TANF.” Further, in a July 18 letter to Chairman Camp, Secretary Sebelius affirmed that the goal of the waiver initiative is to “accelerate job placement rates for those on welfare,” and pledged to reject any plan that undercuts the work requirements established in welfare reform.

Existing authorization for TANF expires on September 30, and it appears unlikely that Congress will take up comprehensive legislation to reauthorize TANF as the 112th Congress draws to a close. The types of demonstration projects HHS has proposed are ones that National Skills Coalition has advocated for repeatedly, including those that would create stronger alignment between TANF and other federally-funded workforce development programs, implement career pathways models, and increase access to training for skilled jobs. In the absence of comprehensive reform, National Skills Coalition strongly supports the Department’s efforts to grant more flexibility to states to pursue innovative strategies to reduce reliance on government assistance, and urges Congress to support those efforts as well.

Sincerely,

Rachel Gragg, Ph.D.
Federal Policy Director
National Skills Coalition