

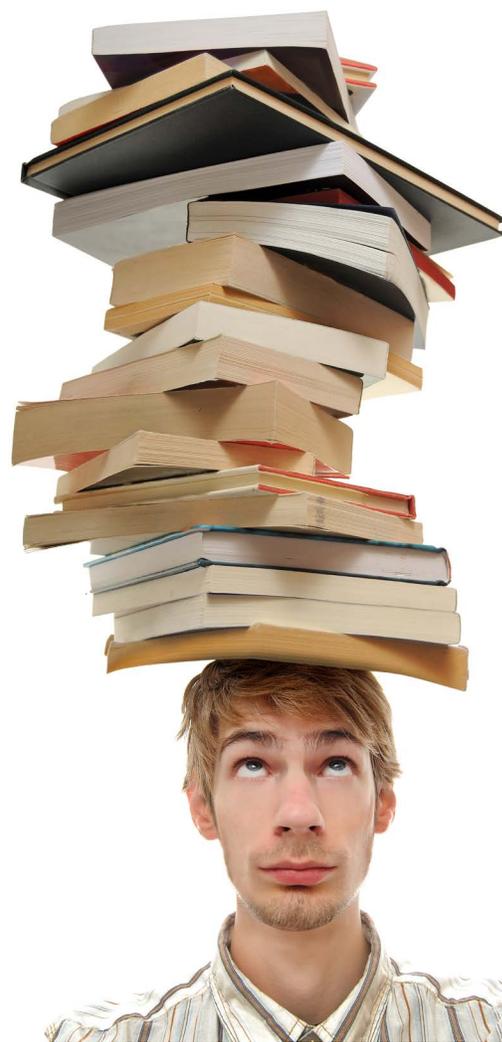
# State Options in Expanding Access to Education in TANF Programs

BY JAMES GODDARD, BECKY GOULD, KEN SMITH, AND TRISHA THOMPSON

The Social Security Act of 1935 established the Aid to Families with Dependent Children program, or AFDC, as a grant program that allowed states to give cash support to vulnerable families. When Congress passed the Personal Responsibility and Work Opportunity Reconciliation Act in 1996, it replaced AFDC with a work-focused block grant program called the Temporary Assistance for Needy Families program, or TANF.<sup>1</sup> Congress authorized states to use TANF funds to “end the dependence of needy parents on government benefits by promoting job preparation, work, and marriage.”<sup>2</sup> TANF’s intent is to transition families off cash assistance by moving more of its recipients into the workforce. However, in the years that followed TANF’s implementation, employment rates increased, but many of the jobs gained paid wages below the federal poverty level and did not include benefits.<sup>3</sup> More TANF recipients were working but generally were not transitioning off cash assistance as intended.

One explanation for why more employment of TANF recipients did not lead to more economic stability is that many TANF recipients did not have the education or skills to get a quality job. Employers increasingly require

postsecondary education or a specific certification for positions once available to those with a high school degree or equivalent. By 2020 an estimated two-thirds of job openings will require postsecondary education or training.<sup>4</sup> In other words, a college degree is becoming the new high school diploma: the minimum credential required to get a basic, entry-level job.<sup>5</sup> With more jobs requiring postsecondary education, people without access to education are finding it harder to get by. According to the U.S. Department of Education, people with a bachelor’s degree typically earn 66 percent more than those with a high school diploma and are less likely to become unemployed.<sup>6</sup>



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The surest path to economic independence is education. To achieve long-term, sustainable success in helping low-income families move ahead, states should be doing more to ensure access to education for TANF recipients. However, as a result of various federal and state restrictions, and the general “work-first” approach many lawmakers take when considering welfare system reform, TANF recipients in many

states do not have meaningful access to education. Nonetheless, some states, such as Nebraska, have developed ways to operate within the federal requirements and create pathways to higher education for TANF recipients. Here we describe Nebraska’s approach to creating those pathways, highlight related efforts taken by other states, and identify a few advocate opportunities for ensuring access to higher education—and true economic opportunity—for vulnerable populations.

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1 See generally [Featured Collection: Welfare Reform](#), CLEARINGHOUSE COMMUNITY (n.d.); [Olivia Golden et al., Twenty Years After Welfare Reform: Reflections and Recommendations from Those Who Were There](#), CLEARINGHOUSE ARTICLE (Aug. 2016).

2 42 U.S.C. § 601(a)(2) (2014).

3 [Mark Greenberg et al., Center for Law and Social Policy, State Opportunities to Provide Access to Postsecondary Education Under TANF](#), at i (Feb. 2000).

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4 [Press Release, U.S. Department of Education, Fact Sheet: Focusing Higher Education on Student Success](#) (July 27, 2015).

5 [Catherine Rampell, The College Degree Has Become the New High School Degree](#), WASHINGTON POST (Sept. 9, 2014).

6 *Id.*

## TANF Overview

TANF is a block grant the federal government provides to states, which have broad discretion as to how to use the funds to operate state-specific programs. States must invest, as a prerequisite to receiving funding, some of their own money into programs for low-income families.<sup>7</sup> This state-investment requirement is called the “maintenance-of-effort” requirement, and states face severe penalties if they fail to meet it. States may use federal funding and their own maintenance-of-effort dollars to fulfill any of the four objectives laid out in the 1996 welfare reform law.<sup>8</sup>

States must require most able-bodied TANF recipients to participate in certain prescribed work activities and are compelled to impose sanctions on recipients who fail to comply with those requirements. Although states have discretion to set their own policies on who must participate in work activities and what specifically a recipient must do to fulfill the work requirement, those decisions in many states have been heavily influenced by the federal work participation rate. The federal work participation rate requires half of the families receiving TANF funds to be engaged in a countable work activity for at least 30 hours per week and 90 percent of two-parent families receiving TANF to be engaged in work activities for 35 hours per week.<sup>9</sup> If states do not meet the federal work participation rate, they face steep financial penalties. Work require-

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ments can frustrate a state from offering TANF recipients access to education.

States may reduce required federal work participation rates through “caseload reduction credits” based on the extent to which the state’s TANF caseload has fallen since 2005. The U.S. Department of Health and Human Services determines a state’s annual caseload reduction credit by comparing the number of families receiving TANF assistance (through either federal funds or state maintenance-of-effort funds) in the prior fiscal year with the state’s average monthly TANF caseload in 2005. For instance, if a state’s 2013 average monthly caseload is 15 percent less than its 2005 average monthly caseload, the state would receive 15 percentage points of caseload reduction credit to put toward its work participation rate for that year, lowering the rate it must meet from 50 percent to 35 percent.<sup>10</sup>

“Core” work activities that constitute the bulk of the work activities engaged in by parents in families receiving TANF are largely focused on hands-on work and securing immediate employment. These include community service, work experience, on-the-job training, subsidized and unsubsidized employment, and child care assistance to other TANF recipients. Job search and job readiness activities also are included as core activities but are allowed only for a maximum of four consecutive weeks and no more than six total weeks

per year. Vocational education, including professional certifications and associate degree programs, is limited at the federal level to 12 months’ total participation, which falls dramatically short of the time needed for even a full-time student to complete an associate degree program.<sup>11</sup>

“Noncore” work activities are permitted only after a participant meets the required 20 hours of core work activities. Noncore work activities include many foundational education activities such as secondary education, General Educational Development (GED) participation, English as a Second Language (ESL), adult basic education, and education directly related to employment.<sup>12</sup>

By relegating these important educational activities to the “noncore” category of work participation, the federal TANF program limits many recipients’ meaningful participation in such activities. These educational activities can count as full participation only for individuals under 20. In two-parent families, noncore work activities count toward only five hours of participation per week due to the requirement that these families complete 30 hours of core work activities. Some TANF recipients, such as those who are single parents with children under 6, can complete only 20 hours of weekly work activities, and so they are effectively barred from completing foundational education as any part of their required work activities.<sup>13</sup>

Further complicating matters is the Deficit Reduction Act of 2005, which imposed

7 [Center on Budget and Policy Priorities, Policy Basics: An Introduction to TANF](#) (June 15, 2015).

8 The four objectives are to “(1) provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives; (2) end the dependence of needy parents on government benefits by promoting job preparation, work, and marriage; (3) prevent and reduce the incidence of out-of-wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies; and (4) encourage the formation and maintenance of two-parent families” (42 U.S.C. § 601(a)).

9 Center on Budget and Policy Priorities, *supra* note 7.

10 See [Liz Schott & LaDonna Pavetti, Center on Budget and Policy Priorities, Changes in TANF Work Requirements Could Make Them More Effective in Promoting Employment](#) (Feb. 26, 2013).

11 *Id.*

12 See *id.*

13 See *id.*

work requirements on recipients of maintenance-of-effort funding.<sup>14</sup> The Act increased work participation targets that states must meet to avoid financial penalties and imposed burdensome documentation requirements on TANF recipients and institutions offering educational programming to them.

The restrictions built into federal law limit only countable work activities. Although this limitation presents an obstacle for states to meet their target work participation rate,

Children; its benefits are available to families with a household income below 47 percent of the federal poverty level.<sup>17</sup> In the years that followed welfare reform, Nebraska Appleseed led a series of legislative efforts that implemented and enhanced opportunities for TANF recipients to pursue foundational and postsecondary education.

In 2007 Nebraska transitioned adults receiving Aid to Dependent Children and participating in postsecondary education from

L.B. 458 included a sunset provision that would have terminated the subsection extending the vocational education time frame to 36 months. However, in 2016 the legislature passed L.B. 701, which eliminated the sunset provision and permanently reauthorized the positive reforms.<sup>21</sup>

Building on the success of L.B. 458, the Nebraska legislature passed L.B. 507 in 2012.<sup>22</sup> This law allowed Aid to Dependent Children recipient parents 24 or younger to meet work requirements through participation in adult basic education, ESL, or GED programs. The following year, the legislature passed L.B. 240, eliminating the age limit entirely so that (see the table below) all Aid to Dependent Children recipients needing adult basic education, ESL, or GED programming can pursue it and meet their work requirements.<sup>23</sup>

Policies to expand educational opportunity for Nebraska Aid to Dependent Children recipients have not drastically altered the state's federal work participation rate, which is above 50 percent.<sup>24</sup> The limited impact on Nebraska's work participation rate is due to the relatively small number of students compared to the broader Aid to Dependent Children caseload. However, these changes have made a significant impact on the lives of the students who now have better access to education. In the most recent year for which data are available, 96 Aid to Dependent Children recipients pursuing education as a work activity received a certificate or diploma, 159 individuals received an associate degree, and 35 individuals received a bachelor's degree.<sup>25</sup> Further, the average wage of

## Work requirements can frustrate a state from offering TANF recipients access to education.

states have the flexibility to allow individuals to participate in noncountable activities that are deemed to be in the best interest of the family.<sup>15</sup> States with work participation rates that exceed the federal requirement have greater flexibility to expand access to education. Nebraska is one such state and has passed several laws to enhance TANF participants' access to continuing education and higher earning potential.

### Nebraska's Story

While Congress was attempting to "change welfare as we know it" in 1996, Nebraska was undergoing welfare reform at the state level.<sup>16</sup> Nebraska Appleseed was a relatively new organization but was doing its part to promote access to postsecondary education by ensuring that postsecondary education was listed as a work activity under new state law. Nebraska's state TANF program is called Aid to Dependent

federal TANF funds to a solely state-funded program.<sup>18</sup> This gave the state more flexibility to implement education and training opportunities without having to adhere to restrictive federal work participation rates.

In 2009 the state legislature passed L.B. 458, which allowed Aid to Dependent Children recipients to pursue vocational training (e.g., a diploma, certificate, or associate degree) as a core work activity for up to 36 months.<sup>19</sup> This law was a remarkable improvement on the prior requirement that allowed vocational training to count as a work activity for only 12 months.<sup>20</sup> With the passage of L.B. 458, Aid to Dependent Children recipients who continued to participate in vocational education after reaching the 36-month threshold could continue to count vocational education toward their work requirement as a noncore activity.

17 [Nebraska Appleseed, An Employment First Participant's Guide to Choosing Education as a Work Activity: A Handbook for Families, Educators, and Community Organizations](#) (Oct. 2012).

18 [Lavanya Mohan, Center for Postsecondary and Economic Success at the Center for Law and Social Policy, TANF Education and Training: Nebraska's Employment First](#) 3 (Feb. 2014).

19 [L.B. 458](#), 101st Leg. (Neb. 2009).

20 [Nebraska Appleseed, Choosing Education in Nebraska](#) 2, 4 n.3 (n.d.).

21 [L.B. 701](#), 104th Leg., 2d Sess. (Neb. 2016).

22 [L.B. 507](#), 102d Leg. (Neb. 2012).

23 [L.B. 240](#), 103d Leg. (Neb. 2013).

24 Lower-Basch et al., *supra* note 15, at 3.

25 [Nebraska Department of Health and Human Services, Nebraska Revised Statute 68-1721 Report to the Legislature](#) (Dec. 4, 2015).

14 See [Deficit Reduction Act of 2005](#), Pub. L. No. 109-171, 120 Stat. 4.

15 [Elizabeth Lower-Basch et al., Center for Postsecondary and Economic Success at the Center for Law and Social Policy, Ensuring Full Credit Under TANF's Work Participation Rate](#) 3 (March 2014).

16 [Jason DeParle, From Pledge to Plan: The Campaign to End Welfare—A Special Report; The Clinton Welfare Bill: A Long, Stormy Journey](#), NEW YORK TIMES (July 15, 1994).

## EDUCATIONAL OPPORTUNITIES FOR AID TO DEPENDENT CHILDREN PARTICIPANTS IN NEBRASKA

Educational Activity	Intended Participants	How It Works in Nebraska
Secondary Education	Participants under 20 who are married or heads of household	Satisfactory high school attendance meets the full work requirement.
GED Program	Participants who are without high school diplomas and need a GED to achieve self-sufficiency	For participants 19 and under, satisfactory attendance meets the full work requirement. For participants over 19, participation for an average of 20 hours per week meets the full work requirement.
Education Directly Related to Employment	Participants who are English language learners or those who need adult basic education to achieve self-sufficiency	Participation for an average of 20 hours per week meets the full work requirement.
Vocational Education	Participants who need an associate degree, diploma, or specific certification to achieve self-sufficiency	Class time and study time (one hour of study time for each hour spent in class) count toward core and noncore activities for up to 36 months. After 36 months, vocational education counts only toward noncore work hours.
Postsecondary Education	Participants who need a bachelor's degree to achieve self-sufficiency	Class time and study time (one hour of study time for each hour spent in class) count toward core and noncore activities for up to 60 months.

those completing an associate degree was about \$9.60 per hour, a rate that would indicate they have moved off the Aid to Dependent Children program entirely.<sup>26</sup>

### Other States' Efforts

Nebraska is not the only state ensuring that TANF participants can pursue education as a work activity.

**Minnesota** has expanded access to adult basic education, GED, ESL, and postsecondary education for recipients of Minnesota's cash assistance program, the Minnesota Family Investment Program. As of July 1, 2014, program participants are allowed unlimited participation in the above-mentioned education activities as a means of fulfilling work obligations without having to complete other work activities.<sup>27</sup> Prior to the law that expanded

these opportunities, almost 40 percent of program recipients had not earned a high school diploma or its equivalent. The law eliminated procedural obstacles that program recipients had to clear to include educational activities in their work plans. Prior to the law's passage, even when an educational activity was included in the plan, the activity could only supplement another work activity. Minnesota's law requires caseworkers to inform program participants with a high school diploma or GED that they may pursue postsecondary education or training.

This legislative success was made possible by a coalition whose campaign, called "Prosperity for All," emphasized that the proposed changes would benefit program participants and their families as well as employers and the state economy. Advocates highlighted how educational opportunities led to increased earning capacities. While wages in Minnesota

were falling for those with a high school diploma or its equivalent, they were rising for those with four-year or advanced degrees. Advocates also called attention to Minnesota's growing skills gap and pointed out that children benefited when mothers could pursue postsecondary education.

**Maine** implemented Parents as Scholars, a program that offers a range of options to Maine TANF participants pursuing postsecondary education. All TANF-eligible parents in Maine may participate in the program as long as they meet the following criteria: they are enrolled in a two-year or four-year postsecondary degree program, do not hold a bachelor's degree in a field with available jobs, cannot make at least 85 percent of Maine's median income for their family size, will be studying in areas that open up employment opportunities with the potential for financial security, and have the requisite educational background to pursue a degree.

<sup>26</sup> *Id.*

<sup>27</sup> Lavanya Mohan, Center for Law and Social Policy, [A Step in the Right Direction, Minnesota Expands Access to TANF Education and Training Activities](#) (July 1, 2014).

Program participants receive a range of support services. For instance, students can receive child care assistance, transportation, required books and supplies, and school uniforms, up to a certain dollar amount. Although the program generally does not cover tuition, individual colleges frequently offer financial aid to participants. In the event that students eligible for the program are unable to obtain federal financial aid, they can receive up to \$3,500 per academic year from the program.<sup>28</sup> To remain eligible for the program, students must maintain at least a 2.0 grade point average (GPA), be on track to complete their degree in two or four years, and remain full-time students.<sup>29</sup> During their first two years, students must spend at least 20 hours per week in the program. Because students are required to be enrolled full-time, this requirement is generally not a problem. After the first two years as full-time students, participants are required to combine their program hours with 15 hours per week of work experience or spend a cumulative total of 40 hours per week on classes, study, and work experience.<sup>30</sup> In certain cases, exceptions are made upon a showing of “good cause” by the participant. This allows for flexibility should participants have a life event that alters their ability to complete the requirements. Such an event could be the need to care for a family member with special needs, a serious health problem, death, accident, or other family event that necessitates taking time away from academic work.<sup>31</sup> If good cause is granted, the student’s weekly hour requirements are lessened and the

28 [Josh Bone, Center for Postsecondary and Economic Success at the Center for Law and Social Policy, TANF Education and Training: Maine’s Parents as Scholars Program 1](#) (July 2010).

29 *Id.*

30 *Id.*

31 Maine Department of Health and Human Services Office for Family Independence, Chapter 607 ASPIRE-TANF Program Rules 16-2 (March 26, 2016).

student may be granted an additional year to finish a two-year degree or an additional two years to finish a four-year degree.<sup>32</sup>

Since the implementation of Parents as Scholars in 1997, Maine has funded the program with state funds counted toward its maintenance-of-effort requirement. With the passage of the Deficit Reduction Act in 2005, Maine was required to include program participants when calculating its federal work participation rate for TANF purposes. Students count toward the work participation rate for only the first 12 months of their vocational education. After 12 months, those students are required to combine their academic work with countable work activities at a sufficient weekly hour amount to count toward the federal rate. This led to a decline in Maine’s work participation rate, contributing to Maine’s recent difficulties in meeting its work participation rate target.<sup>33</sup>

The strengths of Maine’s Parents as Scholars program are that it allows participants to continue pursuing their education through sensible exceptions to program requirements when unanticipated life events make continued compliance difficult; it was supported by a broad coalition that laid the foundation for political support to sustain the program; and it allows participants to pursue both two- and four-year degree programs. Some of the weaknesses of the program are the difficulty in counting more than 12 months of vocational education toward federal work participation rates and a lack of support for students who lack the education credentials to pursue two- or four-year degrees and have little access to other educational opportunities.

32 Bone, *supra* note 28, at 1.

33 *Id.* at 2.

**Arkansas** created the Arkansas Career Pathways Initiative in 2004 to offer academic and support services to low-income individuals who are either TANF recipients or TANF-eligible adults. The program encourages participants to pursue the requisite educational credentials to obtain employment in local high-demand, high-wage industries.<sup>34</sup> The initiative is offered at 22 community colleges and 3 technical career centers across the state. The first step in the program is to obtain a career readiness certificate, which indicates that the participant learned the basic skills necessary for employment.<sup>35</sup> Students then select a career option and education credential they would like to pursue from a list that is developed by the initiative’s educators.<sup>36</sup> To remain eligible for the program, participants must meet regular admissions standards at their respective institutions.

Throughout their participation in the initiative, students work with counselors and tutors who help them navigate the inherent challenges that low-income students face in higher education. For example, many low-income students may be the first in their family to attend college and may be unaware of college registration practices or financial aid requirements. The same support staff that helps students navigate these challenges also works with the state workforce development agency to identify additional support services, such as child care assistance or transportation, that may be available for the students.<sup>37</sup> Services tailored to students struggling academically

34 [Amarillys Rodriguez, Mississippi Economic Policy Center, Education Works: Strengthening Vocational Education and Training in Mississippi’s TANF Program 9](#) (Feb. 2013).

35 To earn an Arkansas Career Readiness Certificate, job seekers must complete Career Ready 101 instruction and obtain a certain score on three assessments ([The Arkansas Career Readiness Certificate Program “Best Practices”](#) (n.d.)).

36 *Id.*

37 *Id.*

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## TANF's work-first approach to welfare has led to disturbing trends that show increased employment levels but no real progress toward moving people off the program and toward self-sufficiency.

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are available, as are services, such as career counseling and résumé-writing workshops, following the students' completion of the initiative to facilitate a smooth transition from education into the workforce.<sup>38</sup>

### Advocate Opportunities

The opportunities articulated below fall into two general categories: one deals with increasing access to education for TANF; the other relates to effective implementation of educational programming.

#### Increasing Access to Education for TANF Participants.

Advocates can consider several measures to remove barriers between TANF recipients and educational opportunities.

*Analyze where your state falls with respect to meeting federal work participation rates to understand better how much flexibility your state has.* If your work participation rate is well above the federal target rate, your state has room to expand access to education for TANF participants. If a state is struggling to meet its work participation rate, look into alternative methods of expanding access, such as implementing solely state-funded programs.

*Move to fund postsecondary education activities through state funds if possible.* If a state can fund all postsecondary activities through state funds that are not claimed toward its maintenance-of-effort requirement, those activities are exempt from the somewhat strict TANF work

requirements. Thus more TANF recipients in the state would be able to pursue longer education and training programs, resulting in greater economic opportunity and financial security without endangering compliance with the federal work participation rate and subjecting the state to financial penalty.

*Ensure that access to educational activities includes basic education.* For varied reasons, pursuing a two- or four-year degree may not be feasible or preferable for some TANF participants. Without basic education or language skills, a participant would not have meaningful access to postsecondary education even if state laws were changed to expand access to educational programs for TANF participants. States that exceed their federal work participation target should consider expanding access to adult basic education, ESL, and GED programs. These foundational education opportunities can enable later pursuit of postsecondary education. Further, some states offer short-term training that is vocation-oriented and gives instruction in a particular field that can result in entry-level job placement.

*Determine whether the necessary change is statutory or regulatory.* TANF programs can be codified in statute, implemented by an executive department or agency acting with statutory authority, or carried out through some combination of the two. Consider whether the necessary changes should be made through legislative advocacy or an administrative rulemaking procedure or both.

#### Implementing Effective Educational

**Programs.** Just as important as removing barriers to education for TANF recipients is taking steps to ensure that educational programming is implemented well. Advocates have options for improving implementation.

*Put in place programs designed to help low-income students stay in school and transition smoothly into the workforce once they have obtained their education credential.* Low-income students may need additional support, such as counseling or tutoring, before, during, and after their education activity. For instance, many students would benefit from guidance as to registration procedures and financial aid processes. Further, because low-income students face more obstacles to success and retention, academic tutoring and support services are often necessary. Offering students résumé-writing workshops, networking events, and other career services to facilitate the transition from education into the workforce can be effective in starting to close the growing skills gap and move TANF recipients onto a path to meaningful employment, true economic opportunity, and financial self-sufficiency.

*Form partnerships with community colleges.* Well situated to offer vocational and other postsecondary education, community colleges are generally aware of local, state, and national trends in employment opportunities and industry needs such that they can promote career pathways into high-demand, high-wage employment.

*Design compliance requirements in educational programming to allow for unanticipated challenges that interfere with academic obligations.* While basic program eligibility requirements (such as maintaining full-time status, keeping a certain GPA, devoting a certain number of

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<sup>38</sup> *Id.*

## States can use TANF funds, maintenance-of-effort funds, or solely state-funded programs to construct a policy framework that expands access to educational programming for TANF participants.

hours per week to program participation) are necessary, these requirements should be accompanied by an exceptions process that suspends or reduces the requirements when an unexpected life event interferes with a student's compliance with them. Perhaps the best method of administering an exceptions process is to charge caseworkers with determining whether an individual case merits such an exception and to guide them on how to make that determination.

*Form a broad coalition to push reforms in desired areas so that political momentum for maintaining and improving the reforms remains strong.* States, such as Nebraska and Minnesota, that have formed broad coalitions to push for expanded access to educational programs for TANF recipients have had success in maintaining the programs and even expanding and improving them in the face of political opposition.

*Require that TANF participants be informed of the option to participate in education and training activities several times per year.* In Kentucky strengthening outreach by implementing this requirement has led to increased enrollment.<sup>39</sup>

*Compile straightforward and accessible outreach materials that explain your state's educational opportunities within TANF.* Putting together quality outreach materials that clarify your state's TANF

policies and educational opportunities is a good way of promoting awareness of and engagement in those programs. For an example of what that could look like, see Nebraska Appleseed's handbook, *An Employment First Participant's Guide to Choosing Education as a Work Activity*.<sup>40</sup>

In today's economy, low-income people are generally locked out of the pursuit of higher education at a time when economic independence depends on it. TANF's work-first approach to welfare has led to disturbing trends that show increased employment levels but no real progress toward moving people off the program and toward self-sufficiency—TANF's stated goal. While the TANF program and its state-level administration place substantial restrictions on countable education opportunities, states have discretion to use TANF funds in ways they deem appropriate. States can use TANF funds, maintenance-of-effort funds, or solely state-funded programs to construct a policy framework that expands access to educational programming for TANF participants. The federal work-first approach, restrictive work participation rate, and laws such as the Deficit Reduction Act undervalue education's role in building pathways out of poverty, but that

<sup>40</sup> Nebraska Appleseed, *supra* note 17. See also, e.g., Wendy Pollack, Sargent Shriver National Center on Poverty Law, *Getting Ahead: An Adult Student's Guide to Public Benefits in Illinois* (n.d.).

should not stop advocates from working to develop access to education for TANF participants to the greatest extent possible.

### JAMES GODDARD

Director, Economic Justice Program

[jgoddard@neappleseed.org](mailto:jgoddard@neappleseed.org)



### BECKY GOULD

Executive Director

[bgould@neappleseed.org](mailto:bgould@neappleseed.org)



### KEN SMITH

Staff Attorney, Economic Justice Program

[ksmith@neappleseed.org](mailto:ksmith@neappleseed.org)



### TRISHA THOMPSON

Intake Coordinator

[tthompson@neappleseed.org](mailto:tthompson@neappleseed.org)

Nebraska Appleseed Center for Law in the Public Interest  
941 O St. Suite 920  
Lincoln, NE 68508  
402.438.8853



<sup>39</sup> Rodriguez, *supra* note 34, at 11.