



The Welfare-to-Work Grants Program: A New Link in the Welfare Reform Chain

Demetra Smith Nightingale and Kathleen Brennan

The \$3 billion Welfare-to-Work (WtW) Grants program authorized under the Balanced Budget Act of 1997 is the latest component of federal welfare reform and represents the only federal funds specifically designated for work-related activities for welfare recipients. This brief describes main features of the WtW Grants program—including goals of the initiative, types of grants available, allowable activities, and target populations—and discusses key challenges to implementing the WtW programs.

Background

Through the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996, Congress eliminated the 60-year-old Aid to Families with Dependent Children (AFDC) program and replaced it with the Temporary Assistance for Needy Families (TANF) block grant. Unlike AFDC, under which all eligible families were entitled to receive benefits as long as their incomes were below a state-specified level, TANF is time-limited—benefits are limited to a total of five years in a lifetime. PRWORA also eliminated the Job Opportunities and Basic Skills Training (JOBS) program, which provided employment and training services to AFDC recipients and required some recipients, mainly

those with children over three years old, to participate in work or training activities. Under TANF, all recipients are required at some point (i.e., within two years or, at state option, earlier) to engage in work or work-related activities that will quickly lead to a job.

In the short term, nearly every state receives more federal funds under the TANF block grant than it did in the immediately preceding years. Under AFDC, JOBS, and Emergency Assistance (also eliminated by PRWORA), states received \$14.9 billion from the federal government for fiscal year (FY) 1996; under the TANF block grant they received \$16.6 billion for FY 1998.¹ States also have much more discretion in how the TANF block grant is used

compared to the previous AFDC and JOBS programs, including determining welfare grant amounts, deciding what types of work requirements to impose on clients, and deciding how much of the block grant, if any, is used to fund work or training activities. In short, the 1996 legislation gives states more funds and much more flexibility to design their own welfare reform strategies.

The 1996 law also enacted stringent work-related goals that states must meet. In addition to ensuring that all TANF adult recip-

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lients participate in some work activity within two years, states must also meet specific and complicated aggregate participation rates each year. In FY 1998, for example, 30 percent of a state's average monthly number of single parents on TANF must be involved in work activities (generally defined as activities that lead directly to a job, rather than education or training), rising to 50 percent by 2002. The five-year lifetime limit on receipt of TANF assistance adds to the urgency to move individuals permanently into the workplace to avoid the need for expanded safety net emergency services in the future.

WtW in the Context of TANF

The separate WtW funding is intended to help states and localities meet their welfare reform objectives and the goals set forth under PRWORA by providing federal resources above and beyond the TANF block grant to move the least-employable TANF recipients and noncustodial fathers of TANF children into long-term unsubsidized employment.

While WtW shares the same overall objectives of TANF, especially making welfare receipt temporary and changing the culture of welfare from one of cash benefits to one of work and self-sufficiency, it has some unique characteristics.

Administrative responsibility. The U.S. Department of Labor (DOL) and local Private Industry Councils (PICs)²—not the U.S. Department of Health and Human Services (HHS) and welfare agencies—are administratively responsible for WtW. The congressional decision to implement WtW through the Department of Labor and the Job Training Partnership Act (JTPA) system reflects the importance of having a range of labor market driven, employment-related services available for the least job ready of the welfare population. There can be considerable variation in where responsibility for WtW administration and service delivery is located organizationally at both the state and local levels, since governors decide which state agency is responsible for WtW. Adding to the administrative

complexity, states and localities must report their WtW activity and performance to HHS, as they do for the TANF program, not directly to DOL.

Focus on jobs with upward mobility potential. The TANF individual time limits and the state work activity participation rates emphasize moving individuals into jobs as quickly as possible. WtW is also intended to move individuals into jobs, but the legislation recognizes that the longest-term and least-skilled welfare clients may need additional, even long-term, services. These services may consist of a series of work-related activities that include combining work with training, education, and longer-term supportive services. WtW emphasizes helping individuals obtain jobs that offer a chance for upward mobility. One challenge will be to coordinate these WtW objectives with the state TANF “work-first” or immediate employment objectives.

Work-related services, not cash benefits. TANF funds can be used for cash benefits to families with children and for services to move TANF adults into jobs. WtW funds, in contrast, cannot be used for cash benefits and must be used for work-related services.

Targeted population. TANF funds can be used for work-related services for any recipient. WtW funds, however, serve both a subset of TANF recipients and a group not eligible for TANF benefits. WtW is targeted on a subgroup of TANF participants (i.e., those who are least employable and those about to reach the TANF time limit), but funds can also be used to serve those who have reached the time limit and noncustodial parents of children on TANF. At least 70 percent of WtW funds must be used for long-term hard-to-employ welfare recipients or noncustodial parents of long-term recipients' children (see table 1).

Types of WtW Grants

Congress authorized \$3 billion for the WtW grants—\$1.5 billion for FY 1998 and \$1.5 billion for FY 1999. Some funds are set aside at the national level for Indian and Native American programs (1 percent), for evaluation activities (0.6 percent), and for performance bonuses to “successful” states

(\$100 million). Three-quarters of the WtW funds remaining after these set-asides are allocated to states based on a formula, and one-quarter are distributed competitively, based on applications submitted to DOL. As discussed below, both formula and competitive grants target the same populations and can be used for the same types of activities. They are different, however, in how programs are funded and in the types of entities that are eligible to be grantees.

Formula grants. The formula grants account for the largest share of WtW funding—about \$1.1 billion in 1998. Seventy-five percent of the federal WtW funds are allocated to states according to a formula based on each state's share of the poverty population and the number of adults on welfare. As shown in table 2, the amount of federal funds available under the state formula grants for FY 1998 ranges from about \$3 million in small states such as Wyoming, New Hampshire, and North Dakota to over \$190 million in California. To receive WtW formula funds, a state must submit an amendment to its TANF plan to HHS and DOL explaining generally how the new funds will be used. The federal funds require a one-third state match (i.e., a 2-to-1 federal funding match to the state), but up to 50 percent of the state match can be in-kind rather than cash. Some states, such as Wisconsin, require local communities to provide the match. Eighty-five percent of a state's formula funds must be passed through to local PICs based on the number of persons in poverty in the JTPA service delivery area, the number of adults on TANF for 30 months or longer, and the number of unemployed persons. The remaining 15 percent can be used for state-designated special projects. The governor determines which agency is to administer WtW at the state level, but at the local level the PIC is the WtW administrator unless the governor requests DOL to approve another local administrative entity.

As of August 5, 1998, 38 states had been approved by DOL to proceed with the program (see table 2). Several other states are awaiting DOL approval. A few states have decided not to request WtW funding. For example, Idaho's caseload and WtW grant are so small that the state feels the additional

Table 1
Target Population for Welfare-to-Work
Grants Program

A. At least 70 percent of the WtW funds must be used for:

- Long-term welfare recipients with labor market barriers.
(1) On TANF or AFDC for 30 or more months or within one year of reaching a TANF time limit,

AND

(2) Facing two of three labor market barriers: (a) no high school diploma or GED and low reading or math skills, (b) requiring substance abuse treatment for employment, or (c) "poor work history" (no more than 13 consecutive weeks full time in unsubsidized employment in the prior 12 months).

OR

- Noncustodial parents of minors whose custodial parent meets the above criteria.

OR

- Individuals who have two of the three barriers but are no longer receiving TANF because they have reached the federal or state lifetime limits.

B. Up to 30 percent of WtW funds can be used for potential long-term welfare dependents:

- TANF recipients who have characteristics associated with long-term welfare dependency, such as teen pregnancy, a poor work history, or school dropout.

OR

- Noncustodial parents of minors, if the noncustodial parents have such characteristics and the custodial parent is receiving TANF.

OR

- Individuals who have such characteristics but are no longer receiving TANF because they have reached the federal or state lifetime limits.

funds are not needed. Ohio recently announced that it will not seek the formula funds because there are too many restrictions on the use of the funds and the state considers the funds available under the TANF block grant sufficient for the welfare-to-work program. However, all states can elect to receive WtW funds in 1999, and even if states do not request the formula funding in either year, local groups and organizations can submit applications to receive WtW competitive grant funds.

Competitive grants. The competitive grants account for the other 25 percent of federal WtW funds. Local governments, community-based organizations, and other entities can apply to DOL for a WtW competitive grant, in consultation with the local PIC. Unlike the formula grants, no matching funds are required and there is no

formula to determine how much funding each grantee receives. The first round of competitive grants, totaling about \$195 million, was awarded in May 1998 (see table 3), with other rounds of similar scale to be funded in summer and fall 1998 and spring 1999.³ DOL has announced that the first and second rounds will fund grantees in high-poverty urban and rural locales (poverty rates of 7.5 percent or higher), and selection will be based on relative need for the program in the local area, the project's innovativeness, proposed outcomes, local collaboration and sustainability, and the demonstrated capabilities of the organizations applying for the grant.

The formula and competitive grants, including the matching funds required under the formula grants, amount to about \$2 billion for employment-related activities each year for FY

1998 and FY 1999, *in addition to any TANF block grant funds states choose to spend on employment-related services.* This represents a considerable amount of new funding, actually exceeding the total federal plus state spending on JOBS in 1996, which was \$1.3 billion. There are no estimates yet of the number of persons eligible for WtW services because the eligibility criteria allow some state and local discretion in targeting, but a rough estimate is that about 1 million persons might be eligible (about one-third of TANF parents or their corresponding noncustodial parent). If so, the WtW funding translates into about \$2,000 per eligible person, in addition to any TANF funds the state designates for work activities.

Allowable Activities

The WtW funds under both the formula and competitive grants can be used for a range of activities intended to move individuals into jobs, with an emphasis on jobs that have the potential for increased earnings. The funds can be used quite broadly for employment-related activities, including wage subsidies in the public or private sector; on-the-job training; job readiness services; job placement services; post-employment services; vouchers for job readiness, placement, or postemployment services; community service or work experience; job retention services; and supportive services (if not otherwise available).

DOL is particularly interested in certain service strategies and arrangements for the competitive grants, including expanded or more accessible transportation services;⁴ expanded or more accessible child care services; integrated work and learning skills development; family-focused assistance; job creation; self-employment; nontraditional occupations for women; work-based strategies with direct employer involvement; integration with child and other family assistance services; and integration with workforce development and welfare systems.

There are two service restrictions. First, if the WtW operating entity wishes to have a stand-alone job placement program or a program to provide world-of-work training or other job readiness

Table 2
Welfare-to-Work Formula Grants, FY 1998

State	Federal Dollars Available (in thousands)	Share
Total	\$1,104,750.0	100.00%
Alabama*	13,978.0	1.27
Alaska*	2,926.5	0.26
Arizona	17,417.3	1.58
Arkansas*	8,490.3	0.77
California*	190,417.3	17.24
Colorado*	9,878.9	0.89
Connecticut*	12,005.9	1.09
Delaware*	2,761.9	0.25
District of Columbia	4,646.5	0.42
Florida	50,756.5	4.59
Georgia*	28,409.5	2.57
Hawaii*	5,085.5	0.46
Idaho	2,793.9	0.25
Illinois*	48,662.8	4.40
Indiana*	14,552.4	1.32
Iowa*	8,331.8	0.75
Kansas*	6,668.4	0.60
Kentucky*	17,722.9	1.60
Louisiana*	23,707.3	2.15
Maine*	5,156.4	0.47
Maryland*	14,940.6	1.35
Massachusetts*	20,692.3	1.87
Michigan*	42,226.3	3.82
Minnesota*	14,503.4	1.31
Mississippi	12,990.8	1.18
Missouri*	19,767.4	1.79
Montana*	3,194.4	0.29
Nebraska*	4,021.6	0.36
Nevada*	3,384.1	0.31
New Hampshire*	2,761.9	0.25
New Jersey	23,257.1	2.11
New Mexico*	9,715.6	0.88
New York	96,886.1	8.77
North Carolina*	25,332.2	2.29
North Dakota	2,761.9	0.25
Ohio	44,608.0	4.04
Oklahoma*	11,741.5	1.06
Oregon*	8,636.9	0.78
Pennsylvania	44,295.7	4.01
Rhode Island*	4,419.9	0.40
South Carolina*	12,006.4	1.09
South Dakota	2,761.9	0.25
Tennessee*	21,644.0	1.96
Texas*	76,058.9	6.88
Utah	4,627.8	0.42
Vermont*	2,761.9	0.25
Virginia*	16,548.6	1.50
Washington*	22,674.6	2.05
West Virginia*	9,805.5	0.89
Wisconsin*	12,886.0	1.17
Wyoming	2,761.9	0.25
Puerto Rico	34,556.1	3.13
Virgin Islands	553.5	0.05
Guam*	585.3	0.05

Sources: FY98 Welfare-to-Work State Formula Grants, Awarded as of August 5, 1998; Final Planning Estimates and Key, Implementation Timeline. U.S. Department of Labor, Employment and Training Administration, <http://wtw.doleta.gov>.

* These states have been awarded WtW grants.

Table 3
Round 1 Welfare-to-Work Competitive Grants

Organization	Location	Funding (in thousands)
Total		\$195,479.2
National Goodwill Industries WtW Consortium	multi-site	10,300.0
The Noah Group, L.L.C.	multi-site	7,800.0
The Corporation for Ohio Appalachian Development	Athens, OH	5,000.0
Mayor's Office of Citizens Employment and Training/PIC of Atlanta, Inc.	Atlanta, GA	5,000.0
Houston Works	Houston, TX	5,000.0
Indianapolis Indiana Private Industry Council	Indianapolis, IN	5,000.0
City of Los Angeles Housing Authority	Los Angeles, CA	5,000.0
The City of Little Rock	Little Rock, AR	5,000.0
Oakland Private Industry Council	Oakland, CA	5,000.0
City of Phoenix Human Services Department, Employment and Training Division	Phoenix, AZ	5,000.0
River Valley Resources, Inc.	Madison, IN	5,000.0
The Workplace, Inc., Southwestern CT	Bridgeport, CT	5,000.0
DePaul University	Chicago, IL	5,000.0
IAM CARES, MD—International Association of Machinists, Center for Administering Rehabilitation and Employment Services	multi-site	5,000.0
County of Union	Elizabeth, NJ	5,000.0
Louisville and Jefferson Private Industry Council	Louisville, KY	4,999.9
United Way of Central Alabama	Birmingham, AL	4,998.0
Consortium for Worker Education	New York, NY	4,966.0
Hudson County Department of Health and Human Services	Secaucus, NJ	4,914.3
National Association of Private Industry Councils	multi-site	4,912.7
City of Detroit Employment and Training Department	Detroit, MI	4,880.0
Non-Profit Assistance Corporation	New York, NY	4,871.9
YouthBuild USA	multi-site	4,718.2
Riverside County Economic Development Agency/Workforce Development Board	Riverside, CA	4,450.0
The Institute for Responsible Fatherhood and Family Revitalization	multi-site	4,427.3
Private Industry Council of Philadelphia, Inc.	Philadelphia, PA	4,351.3
Private Industry Council of Milwaukee County	Milwaukee, WI	4,262.1
Private Industry Council of San Francisco, Inc.	San Francisco, CA	4,189.2
Metropolitan Area Planning Council	Boston, MA	4,082.1
Center for Employment and Training—Welfare-to-Work National Project	multi-site	4,003.3
CHARO Alliance WtW	Los Angeles, CA	3,999.7
Community Rehabilitation Industries and Goodwill Industries of Long Beach	Long Beach, CA	3,669.9
Richmond Private Industry Council and Rubicon Programs	Richmond, CA	3,271.6
Northern Community Investment Corporation	St. Johnsbury, VT	3,132.5
Los Angeles County Private Industry Council	Los Angeles, CA	3,000.0
City of Chicago—The Workforce Board	Chicago, IL	3,000.0
Bethel New Life	Chicago, IL	2,739.5
Total Action Against Poverty, Inc.	Roanoke, VA	2,736.3
Southeastern Community College	Whiteville, NC	2,638.6
Consortium of Family Employment Service Providers	Washington, DC	1,965.6
Hampton University Career Advancement Resiliency Empowerment (HU-CARE)	Hampton, VA	1,898.3
Merced County Community Action Agency	Merced, CA	1,879.1
Resources for Human Development, Inc.	Philadelphia, PA	1,866.5
Florida Developmental Disabilities Council	Tallahassee, FL	1,660.4
Pinellas Workforce Development Board, Inc.	Clearwater, FL	1,500.0
Rocky Mountain SER/Jobs for Progress, Inc.	Denver, CO	1,460.9
Catholic Social Services of Albuquerque, Inc.	Albuquerque, NM	1,343.1
The Cambodian Family	Santa Ana, CA	1,216.2
City of Kalamazoo—Metro Transit System	Kalamazoo, MI	375.0

Source: *FY98 Welfare-to-Work Competitive Grants, Awarded May 27, 1998*. U.S. Department of Labor, Employment and Training Administration, <http://wtw.doleta.gov>.

or postemployment services to WtW participants, then that must be done through contracts or vouchers; it cannot be done in-house. Second, WtW funds cannot be used for stand-alone job training or education; however, the funds can be used for training or education once a person has begun work, either as a postemployment service in conjunction with work or as a work-based activity. Past research suggests that the most effective training is work based, and the WtW funds can be used creatively to support skills training and work combinations. WtW funds can also be used for paid and unpaid community service or work experience jobs, including publicly subsidized employment in the public and nonprofit sectors and traditional on-the-job training.

Target Population

Both the formula and competitive grants are to fund services for the hardest-to-employ welfare recipients. The legislation is fairly prescriptive about client eligibility, as noted earlier in table 1, but it allows state and local programs to determine which groups will receive priority and whether to focus mainly on specific eligible subgroups.

The intent of Congress was that these funds be used for the least employable of the TANF population—long-term welfare recipients, those reaching the time limit, and persons with limited education and poor work history. These same groups can be served using TANF funds, but there are two major ways that WtW funds can also serve persons ineligible for TANF funds. First, an individual's eligibility for services under WtW is not time-limited—once eligible, one can continue to receive WtW assistance indefinitely. Second, WtW funds can be used flexibly to serve noncustodial parents—not just noncustodial parents who are delinquent in paying child support or those mandated by a court order.

Implementation Issues

Several WtW features present particular challenges for implementation, as discussed below.

Timing is critical. WtW is not a permanent authorization, so state and

local initiatives must be mounted quickly. The funds will be distributed in 1998 and 1999, but states and localities will have three years from their award date to spend their total funds. There is considerable time pressure on the federal agencies to issue regulations and guidelines, distribute funds under both the formula and competitive grants components, and provide technical guidance. There is also pressure on state and local systems to quickly integrate WtW with both the preexisting TANF work programs and the JTPA and workforce development programs. These are substantial administrative tasks that must be carried out in a very short time period.

Federal roles are being redefined. DOL has primary responsibility, but HHS has a collaborative role, especially in ensuring that WtW is coordinated appropriately with TANF policies and programs. Coordination and compatibility of DOL and HHS regulations, procedures, and guidelines will be extremely important to the timely and successful expenditure of WtW funds and implementation of programs.

Interprogram and interagency collaboration, especially at the local level, will be critical. An underlying assumption of both PRWORA and WtW is that states and localities will be given more flexibility than in the past to design and operate welfare and work-related programs. A related assumption is that this expanded devolution will encourage more coordination of resources across programs and more partnerships between public agencies and the private for-profit and nonprofit sectors. There is already extreme system variability in welfare reform, and WtW will increase the variability. For example, many state and local TANF agencies are now contracting out many program responsibilities to other agencies and private contractors. Local PICs, rather than state TANF agencies, are responsible for WtW program design and implementation, and local governments and even nongovernmental entities are eligible to apply independently for WtW competitive grants. This system complexity will present great coordination challenges to local administrators trying to minimize

duplication of effort and maximize services and resources to the target population.

Program Opportunities

Recognizing the complexity of the new grant program and the important implementation constraints, WtW nonetheless provides states and localities with considerable new funding that can be used for a broad range of employment-related services and activities. The funds can be used quite flexibly to create or improve state and local institutional mechanisms that can better serve the labor market needs of welfare recipients and other low-skilled workers.

Target some WtW funds on those persons and services for whom funding is not otherwise available. States can already use their TANF block grant to fund all the services allowed under WtW. However, states are limited under that block grant to serving persons while they are TANF recipients—or at least before they reach the time limit.⁵ Clients with the most serious problems in the labor market, such as those with multiple barriers, may need longer-term employability services and postemployment support, even if they are no longer under TANF. Many persons with limited work histories who have reached the TANF time limit would continue to benefit from employability development services, job coaching, or other work-related support. Individuals will not lose their eligibility for WtW funds—services can continue indefinitely, as long as the program authority is in effect.

Similarly, there are few public resources that can be used generally to serve noncustodial parents with employment problems. TANF funds can be used to serve both parents in two-parent cases, and states can require noncustodial parents with overdue child support payments to participate in work activities. The WtW funds provide an important additional source of funds and employment development services for all low-skilled fathers of TANF children. An increase in fathers' employment and earnings should also increase regular child support payments to their children.

Many states and localities are planning to use much of their WtW formula

grant for employment-related programs for noncustodial parents, and a large number of the first-round competitive grant applications are also targeted on fathers. Michigan, for example, plans to use the state's formula funds for noncustodial parents, and noncustodial parents are a primary target for Wisconsin's formula funds. Milwaukee's competitive grant also targets fathers and includes a strategy to remove various legal barriers to employment that noncustodial parents face, such as problems with child support orders and payments, motor vehicle violations and license restrictions, and special issues relevant to ex-offenders with criminal records or probation and parole provisions.

Use the WtW funds to build capacity to deliver seamless and ongoing labor market services to low-skilled workers. Rather than use all WtW funds to mount a separate welfare-to-work program, states could coordinate resources from different programs (e.g., JTPA, adult education, TANF, vocational education, public transit systems, child support enforcement, Food Stamps, One-Stop Centers, Pell Grants) to maintain "seamless" and continuing services to improve basic and employment skills for those who currently have the weakest labor market skills. For example, Minnesota will use some of its state project funds to aid coordination among local entities serving WtW participants. Louisiana also is spending funds to foster partnerships among agencies and to enhance capacity statewide. Such partnerships will allow all service providers in a community to broker the broader range of services needed by this population, including social services, education and training, transportation, counseling, housing assistance, and legal assistance.

Emphasize work-based employability development. WtW's focus on achieving lasting employment with the potential for upward mobility provides an opportunity for states and communities to develop innovative work-based strategies for improving the long-term status of low-skilled workers. WtW funds cannot be used for stand-alone training and education to prepare for a job, but they can be used for training and education in

conjunction with a job. Postemployment services can be broadly defined to include, for example, combining training and work in a subsidized job, funding work-based education and training, supported work experience, integrating basic and vocational training into an on-the-job training activity, developing career-ladder positions in the private sector, and funding job coaching support for persons once they start working to improve job retention and encourage career development.

Conclusion

The WtW grants provide new resources to serve welfare recipients and noncustodial parents who have weak labor force skills. Localities and local organizations, not just state agencies, can obtain and use the grant funds, maximizing the relevance to local community needs and conditions. Resources from many different programs can be combined to provide seamless labor market services to individuals. Work-based skill development strategies can be funded to support upward mobility. There are many challenges to using the funds, including understanding the complex features of the two grant components, submitting plans and grant applications, interacting with two federal agencies rather than one, and dealing with the short-term nature of the funding. But the availability of such a substantial amount of new federal funding that can be used very flexibly offers localities another opportunity to improve their institutional capacity to help low-skilled workers achieve long-term economic self-sufficiency without welfare.

Notes

1. U.S. Congress, House Ways and Means Committee, *1998 Green Book: Background Material and Data on Programs within the Jurisdiction of the Committee on Ways and Means*. Washington, D.C.: U.S. Government

Printing Office, 1998, Table 7-41, pp. 506–507.

2. PICs have local responsibility for programs funded under the Job Training Partnership Act in designated geographic Service Delivery Areas (SDAs). In each local area, a PIC oversees the workforce and training policies of the local SDA. Many PICs, which have different formal names in each community, have been restructured as Workforce Development Boards.

3. The first round of competitive grants was awarded on May 27, 1998. The second round of applications was due July 14, 1998, and awards will be announced in September. The third round of applications will be scheduled for submission in fall 1998, and the final round will be submitted in spring 1999.

4. Comprehensive federal legislation on highways and transportation recently passed by Congress includes \$150 million a year (FY 1999–FY 2003) specifically for developing community-based strategies for addressing the transportation needs of welfare recipients and other low-income individuals in becoming and remaining employed. The highway legislation also encourages, but does not mandate, states to set aside training positions resulting from transportation contracts for welfare reform clients.

5. TANF recipients who leave welfare for employment continue to receive "transitional" child care and Medicaid for up to 12 months, after which they could still receive those services as long as their incomes meet regular Medicaid and child care program eligibility guidelines. Those who have reached their TANF time limits could also qualify for regular Medicaid and child care.

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