



Work Requirements, Education and Training, and Child Care

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National and state policymakers are considering whether to expand or establish work requirements for safety net programs such as the Supplemental Nutrition Assistance Program (SNAP) and Medicaid. During this process, policymakers should take into account what safety net program recipients need to meet those requirements and place themselves on a path toward self-sufficiency—the larger goal of all safety net programs. Among those potentially subject to work requirements are low-income parents with limited education and low skills who need education and training to find and keep stable jobs (box 1). However, a lack of quality, affordable child care often inhibits parents' pursuit of education and training. Child care is expensive, subsidies are limited for parents with these needs, and care is often not available during the evening and weekend hours or irregular schedules when many parents need coverage.

If these parents cannot find child care and do not get the education and training they need to meet new work requirement demands, they may lose vital benefits that allow them to buy food, receive medical care, and afford a home.¹ Failure to assist families effectively in improving their skills, coupled with the loss of benefits, can fundamentally undermine the larger goals of work requirement policy, because parents' well-being and ability to work may be compromised, negatively affecting children's healthy development and, thus, the future workforce. However, addressing the child care needs of such families could help meet the goals of work requirement proposals and help low-income parents get ahead.

BOX 1

Understanding Current and Proposed Work Requirements

Work requirements are not new to safety net programs. Some low-income families who receive federal cash, food, and housing assistance are already subject to work-related requirements, such as searching for a job, receiving job training, or engaging in employment and community activities. In the past year, Congress and the Trump administration have sought to expand those requirements and introduce work requirements in other programs.

In November 2017, the US Department of Agriculture’s Food and Nutrition Service sent a letter to states signaling interest in expanding SNAP work requirements.^a In March 2018, the Centers for Medicare & Medicaid Services also wrote a letter to governors signaling interest in work requirements as a condition of Medicaid eligibility.^b Several states have since applied for approval to implement such requirements in Medicaid.^c In April 2018, the Trump administration released an executive order instructing all cabinet departments to develop work requirement policies for recipients of federal aid programs. And in June 2018, the US House of Representatives passed a version of the Farm Bill reauthorization that expands and intensifies work requirements for SNAP recipients.

Proposed and existing requirements vary in who would be subject to them. For example, parents of children under age 18 currently are exempt from the most stringent SNAP work requirements, but the House proposal would expand the requirements to include parents of children ages 6 through 17. State Medicaid waiver requests differ in whether they exempt parents of children of certain ages from work requirements, with South Dakota proposing that only families with children under age 1 be exempted.^d

The proposed and current requirements also vary in which activities would satisfy the requirements, particularly whether education and training would be allowable activities. Current federal work requirements in TANF emphasize immediate employment and discourage education and training. However, the Centers for Medicare & Medicaid Services administrator indicated that the agency plans to “approve proposals that promote community engagement activities,” such as “working, volunteering, going to school or obtaining job training.”^e And a Food and Nutrition Service letter stated, “We must facilitate the transition for individuals and families to become independent, specifically by partnering with key stakeholders in the workforce development community.”^f

^a Brandon Lipps, letter to state SNAP commissioners, November 30, 2017, <https://www.usda.gov/sites/default/files/documents/lipps-snap-letter.pdf>, page 1.

^b Thomas E. Price and Seema Verma, letter to the nation’s governors, undated, <https://www.hhs.gov/sites/default/files/sec-price-admin-verma-ltr.pdf>.

^c “Work Requirements Tracker,” Urban Institute, August 21, 2018, <https://www.urban.org/features/work-requirements-tracker?state=California>.

^d Lynne A. Valenti (secretary, South Dakota Department of Social Services), letter to Timothy Hill (Center for Medicaid & Medicare Services), August 10, 2018, <https://www.medicaid.gov/Medicaid-CHIP-Program-Information/By-Topics/Waivers/1115/downloads/sd/sd-career-connector-pa.pdf>.

^e Robert Pear, “Trump Administration Will Support Work Requirements for Medicaid,” *New York Times*, November 7, 2017, <https://www.nytimes.com/2017/11/07/us/politics/trump-work-requirementsmedicaid.html>.

^f Lipps, <https://www.usda.gov/sites/default/files/documents/lipps-snap-letter.pdf>, page 1.

BOX 2

Bridging the Gap

Since 2014, Urban Institute researchers have undertaken a set of phased studies examining child care, postsecondary education, and workforce development. We have looked at the systems, policies, and practices that affect access to child care for parents with low incomes and low skills who are seeking education and training to improve their economic security. We have documented family challenges, explored and shared effective policies and practices, and facilitated collaboration among practitioners. For a complete list of Bridging the Gap products and activities, go to <https://www.urban.org/bridging-gap>.

To inform policy discussions about the implementation of work requirements, we have compiled research insights about meeting the child care needs of low-income parents seeking education and job training. This brief pulls from the 12 studies produced under Urban Institute’s Bridging the Gap: Exploring the Intersection between Child Care and Workforce Development for Low-Income Parents project (box 2), to ensure that the realities facing parents needing education and training are part of this important policy discussion. To frame the issues specific to the population of parents that may be subject to new work requirements, we also analyzed data from the first wave of the 2014 Survey of Income and Program Participation.² Policymakers may want to consider the following insights as they consider the design and implementation of work requirements.

Many Adults in the Major Safety Net Programs Are Parents

Estimates suggest that about 43 percent of SNAP households include children (Lauffer 2017), 36 percent of nonelderly adults in Medicaid are parents (Kenney et al. 2016), and the 42 percent of households enrolled in the US Department of Housing and Urban Development’s Rental Assistance program have children (CBPP 2017, 2018; Kenney et al. 2016). All families receiving Temporary Assistance for Needy Families (TANF) cash assistances include children, as a condition of eligibility.

To Get Good Jobs, Many Low-Income Parents Need to Improve Their Skills

One- to two-thirds of future jobs may require some education and training beyond high school (Carnevale, Smith, and Strohl 2013; Employment Projections Staff 2013). Data consistently show that higher education levels are associated with lower unemployment rates and higher earnings.³

Many parents in the core safety net programs have low education or skill levels. Our analysis of the 2014 Survey of Income and Program Participation finds that an estimated 61 percent of the parents (ages 18 through 50) receiving assistance in 2013 from at least one of the major safety net programs—

TANF, SNAP, Medicaid, housing assistance, or Supplemental Security Income—had a high school education or less. Twenty-three percent had less than a high school education.

Few parents on public assistance programs are in education and training. Despite a clear need for increased skills, only 11 percent of parents receiving public assistance in 2013 from any of the major benefit programs reported being in any school or training (table 1). Slightly over half these parents (6 percent) were working and going to school or training.

TABLE 1

Selected Characteristics of Parents on Public Assistance Programs, 2013

Characteristic	Percent
In school or training	11
In school/training and working	6
In school/training only	5
Has more than one child	65
Has at least one child younger than 3	23
Has at least one child between ages 3 and 5	24
Has at least one child between ages 6 and 12	40
Single parent	57

Source: Survey of Income and Program Participation 2014.

Notes: "Parents on public assistance programs" received assistance at some point in 2013 from at least one of the following programs: TANF, SNAP, Medicaid, housing assistance, or Supplemental Security Income. The categories for child ages are overlapping, as parents may have children in more than one age group.

Lack of Child Care Can Make It Difficult for Low-Income Parents to Access and Complete Education and Training

Many parents on public assistance programs have child care needs. Our analysis of the 2014 Survey of Income and Program Participation (as shown in table 1) found the following:

- Almost a quarter (23 percent) of the parents receiving benefits from major safety net programs in 2013 had at least one child younger than 3, 24 percent had at least one child between the ages of 3 and 5, and almost 40 percent had at least one child between ages 6 and 12. (These categories are overlapping, as parents may have children in more than one age group.) Child care challenges can be significant for parents with children of any age, but are particularly difficult for parents with infants and toddlers (Henly and Adams 2018).
- Almost two-thirds (65 percent) of parents receiving public assistance in 2013 had more than one child.
- Almost three-fifths (57 percent) of parents who received public assistance in 2013 were single parents.

Child care is repeatedly cited as a major barrier to education and training for low-income parents. Although few studies empirically examine the relationship between child care and enrollment in or

completion of education and training programs, in multiple qualitative studies, students who are parents note the importance of child care in achieving postsecondary success (Duquaine-Watson 2007; Johnson et al. 2009; Karp 2011). Similarly, when we interviewed program staff helping low-income parents obtain education and training, they reported that child care was a major barrier to enrollment and completion, and that helping parents access child care was essential to parents' access to, participation in, and completion of workforce development programs (Adams, Derrick-Mills, and Heller 2016; Adams and Gebrekristos 2018).

Child Care Subsidies Are Less Available for Low-Income Parents Seeking Education and Training

Child care is costly. Formal child care can cost families thousands of dollars a year. Child Care Aware of America (2017) reports a nationwide average cost for center-based child care of between \$8,606 and \$8,772, depending on how averages are calculated. These costs can vary widely across states and localities and for children of different ages, with costs for infants and toddlers higher than costs for older children. Thus, child care costs can be prohibitive for families. A recent Brookings report finds that, "Accredited, center-based childcare for a dual-earner family with two young children and with earnings at 150 percent of the average full-time worker's wage would cost that family, on average, 29 percent of their take-home pay. A poor single parent earning 50 percent of the national average wage would have to spend 52 percent of her income for the same services" (Whitehurst 2017, 2).

Public workforce development dollars are insufficient to cover child care costs. The Workforce Innovation and Opportunity Act (WIOA) allows local workforce programs to use funds for supportive services, such as child care and transportation. Although no research examines total workforce funding spent on child care, Wandner (2015) has documented declining funding relative to the program's ongoing demands to meet multiple goals and serve multiple customers. The total 2016 budget for WIOA adult dislocated worker and youth programs was approximately \$3.3 billion, which paid for job search, placement, and training and other services for 1,739,480 people who exited these programs in the program year. Using these funds for child care, which is not the focus of the program, reduces the funds available for WIOA's core services. In the words of a local workforce development administrator in Florida, "It might cost \$500 to put somebody in a training program. It could cost \$6,000 a year for child care" (Adams and Gebrekristos 2018). With many demands on WIOA dollars, state and local workforce programs can end up prohibiting or limiting the amount of WIOA funds that can be used for supportive services, including child care (Adams and Gebrekristos 2018; Spaulding 2015). Less than half the local workforce boards responding to an Urban Institute survey reported using WIOA funds to pay for child care (Spaulding and Gebrekristos 2018).

The public workforce system serves a wide range of customers, including job seekers and employers, and has multiple goals and priorities. Many of the performance measures required under WIOA relate to employment outcomes, which may discourage programs from serving TANF recipients

and other populations with significant barriers to employment. With limited budgets, the workforce system may prioritize those with fewer barriers.

The Child Care and Development Block Grant is underfunded. Almost every state allows low-income parents seeking education and training to get child care subsidies through the Child Care and Development Block Grant (CCDBG). But many states place constraints on the eligibility of those parents (Adams et al. 2014).

Given that CCDBG is funded at a level to serve one in seven eligible children (Chien 2015), most states appear to make families who need child care to attend education and training a lower priority than parents who need child care assistance to work (except TANF recipients, who are often a priority). Therefore, parents seeking education and training make up only a small fraction of the CCDBG caseload in many states (Adams et al. 2014) and can struggle to get assistance (Adams, Derrick-Mills, and Heller 2016; Adams and Gebrekristos 2018). Although the recent increase in CCDBG funding is an important investment in the program, states have many competing demands for these funds—including funding the new requirements that were part of the CCDBG reauthorization—possibly limiting spending on child care for these families. CLASP (2018) suggests that once states meet the requirements of reauthorization, the new funds will serve about 150,000 additional children. To put this in perspective, the CCDBG served an estimated 1.4 million children in 2015, the lowest number served in 17 years (Walker and Matthews 2017). New funds will likely help states implement the new requirements and rebuild the program, but they may not be sufficient to allow states to take on new priorities.

Finally, the conditions under which parents can access child care subsidies for education and training vary by state. According to a 2014 report, 47 states plus the District of Columbia allowed parents who were not on TANF or teens to use CCDBG subsidies to participate in education and training activities. But 27 states placed additional restrictions on the use of subsidies, such as limiting the number or types of degrees, not allowing participation in English as a Second Language programs, imposing time limits, requiring parents to work, and requiring parents to maintain a certain level of performance in their programs (Adams et al. 2014). These policies do not always reflect a good understanding of the realities low-income parents face, promising practices in the workforce development field, and research on strategies that support success.

Low-Income Parents Can Have Trouble Finding Quality, Affordable Child Care That Meets Their Needs

Many low-income parents seeking education and training are likely to need care part time or during nontraditional hours. Many low-income parents who are in school or job training also *work* (Eyster, Callan, and Adams 2014; Spaulding, Derrick-Mills, and Callan 2016), creating complex scheduling challenges and the need for care during non-traditional schedules. Parents who are not working but attending school or training may still only need part-time care, care for nontraditional hours, or care for a schedule that changes often. Child care centers often require parents to pay for full-time attendance even if the child only needs part-time care (NSECE Project Team 2015), and relatively few child care

centers are open outside regular business hours (Dobbins et al. 2016). Thus, parents with part-time or nontraditional work schedules disproportionately use home-based providers, including relatives, friends, and neighbors (Henly and Adams 2018), or rely on multiple arrangements to meet caregiving needs (Laughlin 2013).

Such arrangements can be hard to find. And, as many states are increasingly using subsidies to support center-based slots, parents may face additional challenges paying for home-based care with subsidies. The recent CCDBG reauthorization may inadvertently provide additional incentives for states to limit access to subsidies for family, friend, and neighbor caregivers, although these providers may be best suited to meet these families' needs (Henly and Adams 2018).

Because child care needs can be complex, no single setting or approach works for all families. Families have varying child care needs, preferences, and schedules. Some parents may be juggling school during the day and a job at night, and others may face changes in their child care needs from week to week, depending on their shifts at work or class schedule. Some have longer-term needs (such as those attending college) while others have short-term needs (such as those attending an intense training program). They have differing family compositions—some have multiple young children, others have school-age children—and have varying access to family help. Programs and efforts to support parents need to provide assistance for various care settings and combinations of settings (Adams, Spaulding, and Heller 2015).

Parents may not know all the child care options available in the community and may need information and guidance to find appropriate care. The complexity of the needs described above mean that parents may not know what care is available and what types of care would best meet their needs. However, while parents in education and training need access to services that help them find care, they may not be able to easily obtain such services in their communities. Though some communities have child care resource and referral agencies that can help parents navigate their options, such services are not available in all communities or to all families who may need them (Adams, Derrick-Mills, and Heller 2016; Adams, Spaulding, and Heller 2015). Furthermore, such guidance may not be available to those accessing education and training services through the public workforce system.

Helping Parents Succeed in the Workforce and Meeting Their Child Care Needs Can Benefit Their Children

Supporting parents by helping them access high-quality child care and early education can help support their children's healthy development and longer-term success in two ways:

- **Achieving economic security can be particularly important for the children of low-income parents.** Helping parents obtain employment that yields higher earnings and financial stability affects not only their well-being but also their children's well-being and development (Davis-Kean 2005; Douglas-Hall and Chau 2007; Haveman and Wolfe 1995; Smith, Brooks-Gunn, and Klebanov 1997).

- **High-quality child care helps children have better outcomes.** A large body of research has found that children who attend higher-quality child care and early education programs have better child development outcomes, and that the benefits of high-quality programs are greater for children from low-income families (Phillips et al. 2017; Vandell and Wolfe 2015; Yoshikawa et al. 2013).

How Can Policymakers Better Meet the Child Care Needs of Low-Income Parents, So They Can Access Work, Education, and Job Training?

The findings from our Bridging the Gap project suggest that changes in work requirements carry risks for low-income parents that policymakers should carefully consider. Work requirements seek to help people with low incomes move toward self-sufficiency, which would benefit families if achieved. But if policy changes move forward without addressing the significant challenges that low-income parents needing education and training face to fulfill work requirements, we risk creating greater hardship for parents and children.

If parents subject to work requirements in core safety net programs who need more skills to succeed are to access affordable child care so they can participate in education or training, policy and funding changes are necessary. Insights from prior work suggest four broad potential avenues:

1. **Build on the growing awareness of the child care needs of parents in education and training.** People across political persuasions, sectors, and government levels have highlighted the importance of meeting the child care needs of parents seeking advancement through education and training, not only to help parents succeed but also to promote their children's well-being and development (Adams and Gebrekristos 2018).⁴ In addition to more traditional allies, there are people within the workforce development community who understand these issues. For example, local workforce development board administrators can speak powerfully about child care's role in developing the current and future workforce (Adams and Gebrekristos 2018). Businesses are also more engaged in this issue to support current workers and build the pipeline of future workers (Ready Nation 2017). The growth of two-generation strategies that address parents' education and training needs and children's supportive service needs also demonstrate growing awareness.⁵
2. **Ensure that workforce development programs take child care needs into account.** Workforce agencies can meet their clients' child care needs by undertaking two kinds of strategies:
 - » **Actively help parents access child care services** by including child care partners in local workforce development boards, the development of local plans and the delivery of services through American Job Centers. Through partnerships with child care subsidy agencies and other partners, the workforce system can ensure that child care is part of their client needs

assessment and planning, and maximize the likelihood that parents can access subsidies (Adams and Gebrekristos 2018; Adams et al. 2016).

- » **Redesign their programs to minimize child care challenges.** Workforce programs can schedule education and training activities when child care is easier to access, create cohorts of students that can support each other, partner with child care providers, and locate education and training programming close to child care services (Adams, Derrick-Mills, and Heller 2016).
3. **Address constraints within the child care system that can limit services for these families.** States and localities can support access to child care for these families through three strategies:
- » **Recognize that meeting the child care needs of parents in education and training requires additional funding.** Although the new funds allocated to the program in 2018 may provide states with an opportunity to better meet these families' needs, states have many competing priorities for these funds, and additional funds are likely necessary.
 - » **Take advantage of language in the reauthorized CCDBG law to support access to services for these families.** The reauthorization of the CCDBG in 2014 specifically encouraged family friendly policies; continuity of care; cross-system linkages; consumer education; and improving the supply of care for underserved groups, including child care during nontraditional hours (Adams and Heller 2015; Henly and Adams, forthcoming). States can use these priorities to better meet families' needs.
 - » **Address eligibility barriers in the CCDBG that can limit access to subsidies for parents in education and training.** State child care agencies should assess their eligibility and authorization policies and practices to ensure that they reflect a good understanding of the realities facing these families, and they should reach out to their workforce development counterparts to help their policies support workforce development best practices (Adams et al. 2014).
4. **Build upon the partnership focus in WIOA and CCDBG to facilitate connections between the workforce development and child care systems.** Partnerships are essential to making all the pieces work together for families and children. Local and state entities have identified various creative partnerships between state and local public agencies, postsecondary institutions, local community agencies, child care stakeholders and providers, and the private sector that can fill some gaps for families (Adams and Gebrekristos 2018; Adams and Heller 2015; Derrick-Mills, Heller, and Adams 2016; Spaulding 2015; Spaulding and Gebrekristos 2018).

Remaining Questions

The information above focuses on meeting the child care needs of parents seeking education and training. But questions remain about the key safety net programs and how they are currently configured to address child care needs, should new or expanded work requirements increase the need for these supports.

- **Can parents in the key safety net programs who need education and training to comply with work requirements access workforce development services from their safety net program?** Access to workforce development services for parents receiving assistance varies by program.

 - » The SNAP Employment and Training (SNAP E&T) program funds workforce development supports. However, the E&T program is a small portion of the overall SNAP budget: \$300 million of the \$72 billion in federal funds in 2016, although states also contribute (USDA 2016). The E&T program also varies widely across states, because they determine which clients to serve, what services clients receive, and how the services are provided. Some states rely heavily on WIOA to meet the workforce development needs of their SNAP E&T clients, which, as already noted, may not be resourced sufficiently to meet the needs of SNAP recipients subject to work requirements. Therefore, it is unclear that parents could get services from SNAP if they needed education and training to comply with work requirements.
 - » Medicaid prohibits the use of federal funding to pay for supports (including education and training) to meet work requirements (Katch, Wagner, and Aaron-Dine 2018).⁶ Therefore, states would need to draw on other resources, including state funding, WIOA, and other workforce development sources, to provide workforce development services to families receiving Medicaid subject to work requirements.
 - » TANF relies primarily on WIOA to support education and training for clients subject to work requirements. But TANF recipients often cannot access all WIOA services because of differences in the program's requirements and performance measures (especially with limited funding in the WIOA system) and the personal characteristics of TANF families, such as their need for child care (Hahn et al. 2016).

- **What specific barriers in WIOA and in public benefit programs like SNAP and Medicaid prevent people subject to work requirements from accessing services through WIOA?** We know that TANF's work requirements and incentives do not align well with those of WIOA, creating challenges for TANF families seeking supports from WIOA to succeed (Hahn et al. 2016). And, as discussed in this brief, current WIOA funding limitations already require state and local workforce systems to make difficult choices about what populations, programs, and services should be prioritized (Spaulding 2015). However, there is more to be learned about how different programs' incentives, funding, and possible work requirements align with those of WIOA.

- **Can new safety net participants needing education and training to comply with work requirements access child care subsidies?** Safety net programs also differ in how they recognize the need for funding to support child care that would allow parents to participate in education and training.

 - » TANF recipients are a priority population for child care subsidies in the CCDBG, but they still face challenges in accessing child care, such as the lack of available child care to meet their needs (Hahn et al. 2016).

- » Medicaid recipients are not a priority for CCDBG subsidies, and as noted above, Medicaid does not permit the use of federal funds to pay for supports to meet work requirements. Thus, Medicaid families needing child care assistance would need to seek subsidies from the CCDBG.
- » The SNAP E&T program pays for supports like child care. However, requiring that states match 50 percent of funding using nonfederal dollars means that states cannot draw on WIOA or Medicaid funds, and that they must find additional resources from other sources. Furthermore, the SNAP E&T funding, while flexible, is complicated to administer (Mikelson and Hecker 2018). Finally, as noted above, the SNAP E&T program is relatively small, and given the recent focus on reinstating time limits for able-bodied adults, states may feel pressure to prioritize these individuals with their limited dollars.

This suggests that parents in SNAP and Medicaid who need education and training to satisfy work requirements likely need access to child care subsidies through the CCDBG to afford care. Yet states already lack sufficient funds to serve eligible families, place parents seeking education and training as a lower priority, and face competing demands for the new funds. If the CCDBG is already unable to serve eligible working families, how likely is it that states will prioritize serving families needing education and training to fulfill work requirements?

- **Can safety net program participants find child care that meets their needs?** Another issue that affects all safety net participants is the lack of available child care services to meet participant needs. Although the new federal child care funds could be used to incentivize more providers to serve subsidized families and make it easier for them to find care (Henly and Adams 2018), focusing funds on increasing the quality and availability of care presents a trade-off for state administrators who are also facing increased demand for vouchers. How do we ensure that the supply of quality care meets the needs of families in other safety net programs who may need education and training to meet work requirements?

These and other questions must be explored to ensure that safety net participants have access to necessary services and supports. Imposing work requirements means that when the unavailability or instability of child care prevents parents from maintaining stable employment or engaging in education or training, families can lose not only a job or training opportunity but also assistance for basic needs like food, health care, and housing. However, if the debate recognizes the importance of investing in education and training and child care supports for these families, more parents might get the skills they need to build better lives for themselves and their children while ensuring that their children's basic needs are met.

Notes

- ¹ Housing benefits, such as Moving to Work, are also considering or implementing work requirements.
- ² The Survey of Income and Program Participation is a nationally representative panel survey administered by the US Census Bureau that collects information on household composition, receipt of public benefits, education, and employment. It is one of the primary sources of information on topics related to family well-being and dynamics. The newest Survey of Income and Program Participation panel interviews the same families every year, asking them questions about the prior year to provide data on changes in family circumstances and income. We examined the first wave of the 2014 Survey of Income and Program Participation, the most recent available data. The first wave contains information on 29,825 households interviewed between February and June 2014. The survey gathered information for the year before the interview, so the data represent information for January 2013 through December 2013. A roster was compiled for each household interviewed, and an attempt was made to interview all individuals ages 15 or older in the household. The head of household was typically defined as the owner or renter, and household members included those who slept in the house most nights.
- ³ “Unemployment Rates and Earnings by Educational Attainment, 2017,” Employment Projections, Bureau of Labor Statistics, accessed September 25, 2018, <https://www.bls.gov/emp/chart-unemployment-earnings-education.htm>.
- ⁴ See also Gina Adams, “What Do We Know about Child Care Assistance for Parents in Education and Training Programs?” *Urban Wire* (blog), Urban Institute, October 10, 2014, <https://www.urban.org/urban-wire/what-do-we-know-about-child-care-assistance-parents-education-and-training-programs>.
- ⁵ See, for example, the work of Ascend at Aspen Institute, <https://ascend.aspeninstitute.org/>.
- ⁶ Brian Neale, letter to state Medicaid director, “RE: Opportunities to Promote Work and Community Engagement Among Medicaid Beneficiaries,” January 11, 2018, <https://www.medicaid.gov/federal-policy-guidance/downloads/smd18002.pdf>.

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