

# NCWGE NATIONAL COALITION FOR WOMEN AND GIRLS IN EDUCATION

August 28, 2006

Office of Family Assistance (OFA)  
Administration for Children and Families  
Attention: Mr. Robert Shelbourne  
5th Floor East  
370 L'Enfant Promenade, SW  
Washington, DC 20447

RE: Reauthorization of the Temporary Assistance for Needy Families Program Interim Final Rule, 45 CFR Parts 261, 262, 263, 265 (June 29, 2006)

Dear Mr. Robert Shelbourne:

On behalf of the National Coalition for Women and Girls in Education (NCWGE), a nonprofit coalition of more than 50 organizations dedicated to improving educational opportunities for girls and women, we are writing to share our comments regarding the new Temporary Assistance for Needy Families (TANF) regulations released by the Department of Health and Human Services. NCWGE has concerns about the new regulations, which set out to define the activities countable toward the work participation rate requirements and which also describe how the states must monitor and verify the hours that TANF recipients participate in those activities. NCWGE believes that welfare programs should end the cycle of poverty and promote self-sufficiency through education and job training to help ensure that women are not locked into low-wage jobs.

Welfare-to-work research has shown that the most effective welfare-to-work programs combine a range of services such as job search, education and job training, and work experience. Successful programs typically include education and training opportunities that are work focused and enable recipients to build basic skills like literacy and basic math as well as occupation-specific skills. Finally, successful welfare-to-work programs combine activities which assist participants find unsubsidized jobs. Well-known examples include the Steps to Success program in Portland, Oregon; Parents as Scholars program in Maine; and OPTIONS program in Baltimore, Maryland. These programs result in increased job security, higher hourly wages, and greater access to employer-provided benefits than programs that simply push people into the first job they can find.

NCWGE believes that education and job training have proven to make a critical difference in employability, earnings, and job retention. Only through increased education and job training can women attain jobs that pay a livable wage and stay off public assistance permanently. For example, according to the Bureau of Labor Statistics, workers with a high school diploma earned an average of \$7,400 or 35 percent more per year than workers with no diploma.<sup>1</sup>


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<sup>1</sup> Occupational Outlook Quarterly. *Education Pays*. Bureau of Labor Statistics. 2002. <http://www.bls.gov/opus/ooq/2002/spring/oochart.pdf>. Accessed August 28, 2006.

NCWGE is also concerned about the new guidelines which limit states' ability to count recipients' time spent on class preparation, and allow states to count only "monitored" study time. Monitoring study time in this manner will no doubt disproportionately affect female participants – many of whom are caring for children while pursuing their education. If all class preparation is forced to take place in a structured study session these participants will be required to seek childcare they likely cannot afford, or forego TANF work participation credit. NCWGE believes this is an unnecessary federal intrusion into state program design choices and will make it much harder for states to provide recipients with the time they need to complete homework and study classroom material to be successful in education and training programs. NCWGE believes the policy that states may not count homework and study time as hours of participation in vocational educational training (or another educational work activity) unless the homework is supervised should be eliminated.

Instead of placing an emphasis only on the improvement of job placement among TANF recipients, states should be focusing also on increasing access to educational opportunities. NCWGE understands that the overarching objectives of the regulations are to help states design effective programs that help families move from welfare to work. However, NCWGE believes the interim final rules fail to further this objective. If you have any questions, please feel free to contact Lisa Maatz, American Association of University Women, at 202/785-7720, or Jocelyn Samuels, National Women's Law Center, at 202/588-5180.

Sincerely,



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