



The Journal of Sociology & Social Welfare

Volume 27
Issue 2 June

Article 8

June 2000

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Iversen, Roberta Rehner (2000) "TANF Policy Implementation: The Invisible Barrier," *The Journal of Sociology & Social Welfare*: Vol. 27 : Iss. 2 , Article 8.

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TANF Policy Implementation: The Invisible Barrier

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Barriers to participation in welfare-to-work programs are generally described in terms of human and social capital. Findings from case examination of four Philadelphia-area welfare-to-work programs under TANF suggest that theory about policy implementation is more applicable. Faulty policy logic, organizational and personnel incompetence, and inadequate coordination between and within funding, referral, program, and employer organizations regularly resulted in delayed program start-ups and strained program operations. Generally invisible and absent from research attention, these implementation delays and strains impeded program staff efforts and harmed TANF recipients. States' 24-month time limit policies are a critical target for advocacy efforts.

TANF POLICY IMPLEMENTATION: THE INVISIBLE BARRIER

Passage of the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) in 1996 (P.L. 104-193) replaced sixty years of federal entitlements to needy mothers and children with block grants to the states called Temporary Assistance to Needy Families (TANF). These policy changes resulted in a new configuration of social programs designed to move individuals from entitlement to public assistance to wage work in the labor market: in common parlance, from "welfare to work." In essence, responsibility for the poor passed from the federal government to the states.

Two critical differences pertain to TANF assistance compared to that of its federal predecessor, Aid to Families with Dependent Children (AFDC). First, adults in families receiving assistance

under the block grant must participate in work activities after receiving assistance for 24 months. Second, mandatory time limits now exist in all states, resulting in a maximum of 5 years of allowable TANF assistance over a person's lifetime. Although twenty percent of welfare caseloads may qualify for "hardship" exemption from this 5-year limit, no guidelines for this categorical exemption have been formulated to date. Moreover, federal exemption from cutoff may not apply to states' work requirements.

States now have broad latitude to design critical features of their welfare policy, such as recipient criteria, time limits, and exemption guidelines, as well as its overall aims. For example, the purpose of Pennsylvania's basic welfare law before spring 1996 was "to promote the welfare and happiness of all the people of the Commonwealth by providing public assistance." After spring 1996, Pennsylvania's version of TANF, Act No. 1996-35 (Act 35), intended "to promote the self-sufficiency of all the people in the Commonwealth" (Raffel, 1998:4).

Over the past several decades, sociological theory about human and social capital informed the content and format of welfare-to-work policy and programs. Human capital is created by changing persons so as to give them skills and capabilities that make them able to act in new ways (Coleman, 1990: 304). Social capital develops within varied forms of organizational and interpersonal structures (Coleman, 1990), facilitating actions of individuals within the social structure. According to this framework, individuals receiving TANF assistance who are unable to find a job on their own or through a mandated 8-week job search program are referred to welfare-to-work skills training programs directly related to employment.

States' experiences under TANF, however, belie the ease and fluidity of this formula and the appropriateness of the framework. The 1999 report to Congress from the national evaluation of the Welfare-to-Work Grants Program (Perez-Johnson & Hershey, 1999) briefly mentions difficulties with participant recruitment, eligibility criteria, service delivery and funding. However, a more complete assessment is not expected until fall 2000 at the earliest. A report from Manpower Demonstration Research Corporation (Quint et al., 1999) found similar difficulties in 4 U.S. cities, but this research was conducted at an early period of TANF imple-

mentation. Other than these reports, program-level findings are absent from the research literature.

I report here on implementation problems found in welfare-to-work programs in the Philadelphia area under TANF policy. Case study research revealed massive delays in program start-ups and strained program operations due in part to faulty policy logic, organizational and personnel incompetence, and inadequate coordination between and within funding, referral, program, and employer organizations. Such barriers to implementation occurred regularly, but received little public or research attention compared to the focus on skill and attitudinal barriers among TANF recipients and wage and retention barriers in the service sector jobs some recipients obtained.

While human and social capital barriers undoubtedly influence the transition from welfare to work, this paper presents an alternative position that theory about policy implementation may better explain the realities of participants' experiences in programs under TANF. We suggest that reliance on human and social capital concepts does not capture the interaction of various federal, state, local, and direct service actors who jointly participate in the implementation process (Jansson, 1990.) Without open acknowledgement of these "invisible" barriers by policymakers and program officials, even dedicated and competent program staff incur impediments to fulfilling their jobs. Ultimately, TANF recipients bear the brunt of implementation problems as they use up valuable months of their eligibility for assistance in the interim. At this critical period in which 24-month time limits are reached and assistance can be cut off, information from our study may suggest how to influence policy and program implementation in ways that benefit the individuals most in need—the TANF program participants.

Methodology

Two colleagues and I conducted field research between September 1998 and June 1999 in four Philadelphia-area welfare-to-work programs (Iversen, Rich, & Lewis, 1998):

- A union-sponsored certified nursing assistant training program expecting to serve 540 TANF recipients and 60 non-custodial fathers over a three-year period, 1998–2001;

- A hospital-based (non-certified) specialty care training program for work with adults and children with disabilities and chronic illness; serving 20 TANF recipients per cycle, including one year of follow-up—ultimate number of cycles is undetermined;
- A homeless shelter providing on-site job-training in housekeeping and food service and off-site certified nursing assistance training; initially intending to serve up to 100 women, but mandated by funding source to serve 400 TANF recipients over a two-year period, 1999–2000;
- A suburban family agency contracted to conduct in-depth assessments of TANF participants in three welfare-to-work programs, estimating to serve about 50–100, although the final number is undetermined.

All four programs are sponsored by non-profit service organizations in Philadelphia or the nearby suburbs. Despite the varied sizes of the work program contracts, we found virtual unanimity of issues, problems and concerns among the agencies. Common elements across the four programs included emphasis on participant assessment, individualized case management that included both instrumental and supportive assistance, and job-specific training linked with area-employer input and needs. The four organizations had years of experience working with welfare recipients, and the services of each were guided by missions dedicated to improving social and economic conditions among poor people. All were also experienced in the provision of employment or vocationally-focused services, except that the family agency's service emphasis was improved psychosocial status wherein employment was a concern but not the central focus. Through funding requirements and design, the programs recruited participants who were near their 2-year time limits. Moreover, these programs were mandated to target TANF recipients with barriers such as no high school diploma or GED, drug and alcohol histories, homelessness, poor work histories, or mental health concerns.

The data set consists of detailed notes and verbatim comments gathered from multiple in-person interviews, observations, and discussions with 30 staff members who represented the full universe of staff employed in the 4 agencies' welfare-to-work programs. Twenty-four staff members were women and 6 were men.

Nine were African American, 2 Latina, 1 Asian American, and 18 were white. Twenty of the 30 staff held master's degrees in social work and the remaining ten had college degrees. Data was also drawn from over a dozen phone and e-mail exchanges and observation of multiple program staff-participant work sessions at the four programs, each of which lasted at least 3 hours. While our findings cannot be considered representative of all welfare-to-work programs because of the limited sample size and the non-randomized study design, we address issues of implementation in more depth than has been possible to date by the national evaluations. In addition, unlike the limited extant research, our study focused on program-level data—particularly from the perspective of program staff—and highlighted the experiences of TANF participants considered most needy and difficult to place in employment. Finally, our case example format is characteristic of implementation research (Wood & Paulsell, 1999) and our methodology parallels that of the larger body of welfare-to-work demonstration research (Rangarajan, Meckstroth & Novak, 1998).

POLICY IMPLEMENTATION: THEORY AND CASE EXAMPLES

Policy analysts view implementation as a dynamic process that takes place over time (Axinn & Levin, 1997; Bardach, 1977; Hogwood & Gunn, 1984; Sabatier & Mazmanian, 1979; Schneider & Ingram, 1997). They also emphasize that implementation of a large-scale federal project is exceedingly difficult. According to the seminal work on policy implementation, "program" signifies the conversion of a policy hypothesis into governmental action: a process of interaction between the setting of goals and actions geared to achieving them (Pressman & Wildavsky, 1973). Analysts suggest that three elements influence the adequacy of implementation: the logic of the policy, the competence of relevant personnel, and the nature of the coordination or cooperation the policy requires (Weimer & Vining, 1992; Bardach, 1977). Although these elements are interrelated (Rein, 1983), each is illustrated separately here in order to identify implementation barriers that might be open to redress.

Policy Logic

Policies and the programs instituted by them generally reflect sociological and economic theories about the way the world works (Jansson, 1990). According to implementation theory, a policy must be based upon a valid hypothesis about cause and effect (Hogwood & Gunn, 1984). In Pennsylvania and many other states, the guiding policy directive to TANF programs was "quick attachment" to the workforce, a directive based in part on theory about human and social capital. Accordingly, some individuals receiving TANF assistance were believed to have sufficient educational capital to work, but needed additional behavioral and motivational capital that would be provided by 8-week job readiness and job search assistance programs. Other individuals were viewed as having insufficient educational and behavioral capital that could be mediated by skills accumulation and case management supports in 16- or 20-week job training programs that were directly related to employment. The quick attachment directive also assumed that these individual and organizational remedies would be sufficient for successful transitions to work, thus individuals who did not comply with policy directives would be sanctioned or cut off from further financial or training assistance.

Policy implementers regularly expect too much too soon, especially in regard to programs in which attitudes or behavior are involved (Hogwood & Gunn, 1984). Evaluations of welfare-to-work and job-training initiatives before TANF found modest success in increasing participants' earnings through enhancing human and social capital. Successes were attributed to achievement of education (Briggs, 1999), employer-guided skill development (Perlmutter, 1997), supportive and trusted case management relationships (Rangarajan, Meckstroth, & Novak, 1998; Sansone, 1998), and referral to community resources (Pavetti, Olson, Pindus & Pernas, 1996). However, achieving self-sufficiency generally took at least five years. Such a time frame under TANF would constitute or exceed both the 24- and 60-month time limits for many TANF recipients.

Other scholarship is more pessimistic about wage growth for women who work their way off welfare (Butler & Seguino, 1998; Edin, Harris, & Sandefur, 1998). Human capital barriers included

learning disabilities and/or lack of a high school degree or GED (Burtless, 1997; Cancian & Meyer, 1995), substance abuse, depression and physical or mental disabilities (Jayakody, Danziger & Pollack, 1998), and inadequate parenting skills (Pavetti, Olson, Pindus & Pernas, 1996). Social capital barriers included family responsibilities, inadequate or costly childcare (Cancian & Meyer, 1995), social isolation (Wilson, 1996), inadequate employment networks (Marcenko & Fagan, 1996), and conflicts with supervisors and co-workers (Berg, Olson, & Conrad, 1992; Rooney, 1999). All are aspects of the work transition that also take considerable time to remedy, whether through interpersonal supports or structural changes.

Based on the research literature and our study findings, “quick attachment” policy logic is faulty in its overreliance on human and social capital concepts and its inattention to the amount of time necessary for both individuals and organizations to ensure the welfare-to-work transition. Implementation problems resulting from faulty logic in TANF policy influenced and were compounded by barriers resulting from organizational and personnel incompetence.

Organizational and Personnel Competence

Organizational Competence. At policy onset, the main conduit for TANF policy implementation, the state Department of Public Welfare (DPW), was technologically unable to track individuals on or when they left the welfare rolls. The DPW initially predicted there would be more demand for service in Philadelphia than the existing capacity could supply. Over 27,000 individuals were expected to reach the 24-month time limit between March and June 1999, yet only 7,500 program slots were available (Raffel, Mooney & Finney, 1999). After the first year of implementation, it appeared that the supply of programs exceeded participant demand. Fifteen thousand TANF recipients were expected to enroll in programs sponsored by Greater Philadelphia Works, the city’s welfare-to-work system, but only 7,995 actually did (Yant, 1999). Tracking capacity was unable to explain this disconnect.

As a result, our Philadelphia programs had difficulty recruiting sufficient participants and similar difficulties have since been

reported by other city programs (Cooper & Blanchette, 1999). The slow pace of enrollment necessitated unexpected outreach by staff at the union- and hospital-based programs who had to conduct on-site recruitment at county assistance offices several days a week in order to fill program slots. On average, 2 months of active outreach was necessary for each program cycle—time that program staff preferred to have spent on direct instruction.

Even when recruitment resulted in a cohort of applicants, the programs experienced distressingly low yields that resulted in further start-up delays. Assessments for the first cycle of the certified nursing program began in early February 1999. Of the 58 TANF recipients signed up by the CAO for the initial orientation, 25 attended, yielding 16 for the program. It took five subsequent orientation groups yielding about 75 acceptances to comprise the initial class of 38. The start-up accordingly was delayed for two months, not beginning until early April. Similarly, after on-site recruitment in other homeless shelters, a list of 30 “accepts” yielded only 3 participants (10%) who met CAO eligibility for the shelter work program. Ultimately, to reach the requisite total of 25 to begin the program, over 130 applicants were recruited. This process lasted from October 1998 to March 1999, delaying program start-up for 6 months. Neither the programs nor the CAOs knew why the yields were so low, although they suspected that some opted out because of career disinterest and others were concerned about passing drug/alcohol or criminal eligibility requirements. Inappropriate referrals may also have been a cause.

The Department of Public Welfare was technologically unable to identify essential recipient characteristics among those remaining on the rolls which meant that the primary referral agencies, County Assistance Offices (CAOs), could not generate the information needed by the implementing agencies to effect an appropriate match between a given client and a given service (Bardach, 1977). As other departments did across the country when TANF policies were adopted, DPW relied on estimates based on welfare statistics prior to the introduction of time limits. Accordingly, DPW estimated that one-third of the current rolls consisted of persons considered able to find employment on their own. A second third was expected to find jobs with only the 8-week job search/job readiness assistance. The final third, those considered

“hard to employ,” was expected to need skill training and other instrumental support in order to become employed. In reality, state data systems were unable to assess the certainty of these estimates. It is still not known if these three categories describe the Pennsylvania TANF population, whether TANF participants spread out evenly in the three categories if the categories are in fact correct, and where the thousands of individuals in the “hard to employ” group are. It is clear that they are *not* waiting in line for program referrals at the County Assistance Offices (CAOs).

At the union-based program, funding from their Department of Labor grant specified that two-thirds (70%) of the program participants must be designated “hard to employ,” whereas one-third (30%) must be long-term welfare recipients. After six months of operation, the proportion of program attendees was the mirror opposite: 70% were long-term recipients and 30% were “hard to employ.” As one staff member noted, “no-one knows where the 70-percenters are,” least of all the CAOs and the DPW.

Personnel Competence. An interrelated cause of inappropriate referral and delayed enrollment stemmed from the fact that CAO staff who had been benefits administrators before TANF were expected to become work-program specialists in a short time period, without new training and without having appropriate educational backgrounds. Characteristically in large bureaucratic organizations, new task assignments are given officials or professionals who were well able to carry out their old tasks, but unqualified to carry out the new ones (Bardach, 1977). The multiplicity of new roles for benefits administrators or eligibility workers is graphically illustrated by the array of new titles: employment advisors, job developers, job coaches, and employment coordinators. As TANF policy was implemented, the Department of Public Welfare believed that existing personnel could rapidly learn new areas of competence. The long history of adversarial relationships between benefits administration and social services set the stage for this implementation barrier (Hagen, 1994; Wyers, 1991).

In particular, eligibility workers were now expected to forge relationships with TANF recipients based on mutuality and reciprocity rather than hierarchy and autonomy (Valbrun, 1998). For a TANF recipient to qualify for the shelter welfare-to-work pro-

gram, her CAO "employment advisor" needed to be able to identify if the recipient were living in a shelter. In their position as administrators, few caseworkers were trained to ask this question, thus shelter staff believed that many eligible participants were missed. While similar assessment needs may be addressed in CAO worker retraining, such large-scale reeducation takes time (Stovall, 1999). Doubting the ease of this transition, family agency staff reported that administrators in the suburban CAO asked for volunteers to change from benefits administrators to "caseworkers."

Worse yet, perhaps confused by the profusion of new roles and functions, CAO workers frequently did not give work-program participants information about their continued eligibility for Food Stamp and Medicaid benefits or childcare and transportation allowances (Slavin, 1999; Swarns, 1999). In addition, the DPW erroneously cut off 30,000 parents from childcare allowances they were eligible for, resulting in many work-program dropouts before the benefits were reinstated several months later. These infractions compounded the penalty to TANF recipients of the time lost by inappropriate referral to job training programs. Consistent with implementation theory, however, such variation in how different workers respond to different situations is prevalent in social institutions (Bardach, 1977).

Cumulatively then, faulty policy logic and organizational and personnel incompetence contributed to delays and strains in program operations. These delays and strains were further compounded by inter- and intra-organizational coordination problems.

Coordination Between and Within Organizations

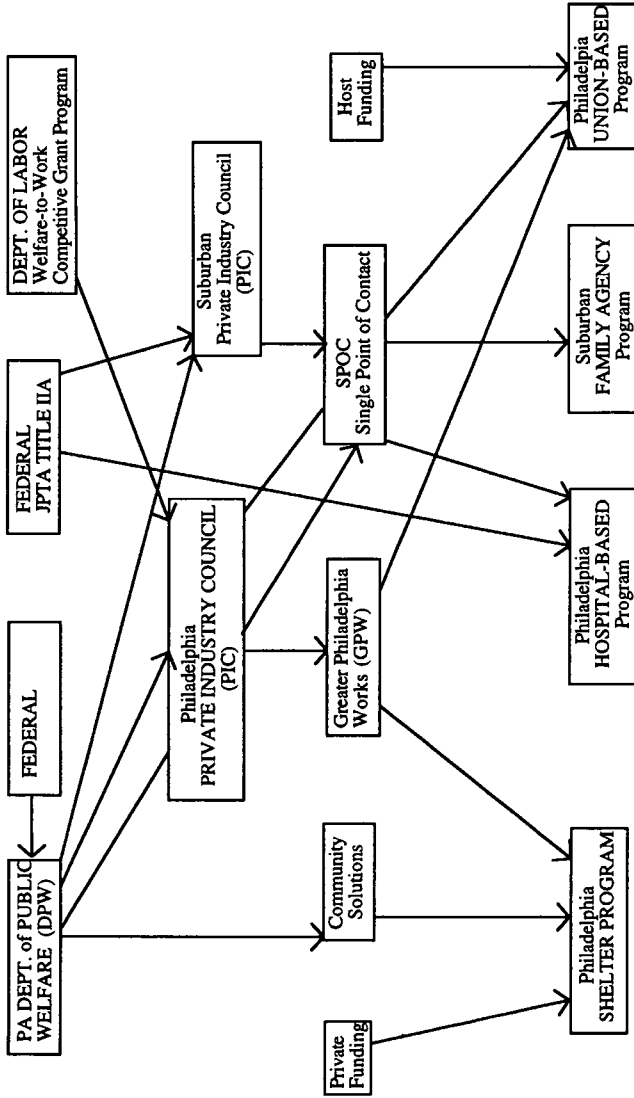
Coordination, or the dynamic process of operations or activities that affect relevant program outputs, is perhaps the most compelling barrier to implementation in public programs (Bardach, 1977). Adding to program delays caused by the lack of recipient information, which we attribute in the above discussion to problems of competence rather than coordination, we found that funding requirements, characteristics of TANF referrals, and welfare-to-work program eligibility requirements were frequently mismatched.

Funding Coordination. TANF funding streams in Pennsylvania are complex and confusing, as Figure 1 illustrates, affecting both program participants and staff.¹ The DPW distributes state welfare funds directly to TANF programs such as the shelter's welfare-to-work effort through a special stream called Community Solutions. The DPW also distributes combined federal and state funds through county Private Industry Councils.² The councils administered these funds to our four programs through intermediaries such as Greater Philadelphia Works (GPW) or Single Point of Contact (SPOC). A separate stream of non-TANF funds from the federal Department of Labor (DOL) Competitive Welfare-to-Work (WtW) Grant Program was also filtered through Greater Philadelphia Works to WtW awardees such as the union-based program, and a stream of federal JTPA Title IIA funds goes directly to the hospital-based program. Contradictory eligibility criteria and program requirements are predictable when programs have multiple sources of funding.

For example, the funding guidelines of both nursing-related programs required targeting "hard to employ" individuals who, among other criteria, "require substance abuse treatment for employment." However, state legislation (PA—Act 14) prohibits persons actively using drugs or alcohol from either training or working as certified nursing assistants in nursing homes—precisely the jobs for which the programs were training participants. Because CAOs are not required to screen for substance use *before* sending TANF recipients to apply for jobs or training programs, some participants began both nursing-related programs to find out 3 to 6 weeks later that their drug and alcohol test performance prohibited their continuation in the program. As a result, the individual's time and energy were wasted, months on TANF continued to build, and the program's resources were spent fruitlessly.

Funding criteria also produced administrative strain. The funding guidelines of the shelter's Community Solutions grant resulted in huge up-front costs for hiring new work program staff yet allocated only \$200 at participant enrollment. The shelter received no additional money from Community Solutions until the trainee was in a job for 1 day, a bit more when the trainee was in the job 6 months, and the final funding at 1 year, exacerbating resource strain. Extremely heavy costs at the front

Figure 1
Funding Streams for Philadelphia-area Welfare-to-Work Programs



end coupled with funding at the back end necessitated their drawing on private contributions originally intended for other purposes and truncated other budget items such as a planned evaluation project and necessary follow-up tracking of former participants.

Finally, funding criteria also produced disconnects between the goals of work programs and the needs and desires of employer organizations. Employers serving as advisors to the hospital-based program indicated at the end of cycle 1 that they preferred to hire graduates with a high school diploma or GED. Yet the program's SPOC funding mandated service to TANF recipients without diplomas or GEDs. To fulfill these contradictory criteria, the cycle 2 program included more hours of GED preparation than cycle 1 had. Staff members considered this costly to participants, however, as it reduced the amount of job-specific content they could deliver. Moreover, many participants were not able to complete their GED exams during the 16-week program, which reduced their employability potential and jeopardized the job placement rate set by the funding agency as a condition for program reimbursement.

Procedural Coordination. Procedural as well as funding complications caused organizational delays and strains. The longer the chain of causality and the more numerous the reciprocal relationships among the links, the more complex implementation becomes (Pressman & Wildavsky, 1973, p. xvi). In a federal system such as the U.S., programs can become overextended in terms of both causal chains and numbers of participating agencies. In addition, decision-making processes internal to an organization often necessitate consultations between numerous units, cumulatively delaying action (Bardach, 1977).

The first cycle of the hospital-based program was initiated relatively smoothly, but onset of the second cycle was delayed almost 6 months. In the interim, the organization that sponsored cycle 1 had merged with the hospital that would now sponsor cycle 2, resulting in the following mixture of administrative strains and program delays.

The PIC contract sent to the newly-merged hospital program in January outlining the cycle 2 requirements specified that em-

employer organizations providing internships would be liable for any suits instituted by TANF participants. While a similar requirement had been acceptable to the cycle 1 organization, the hospital legal department did not approve this clause. Because post-merger changes in hospital management obscured the chain of command, meetings between hospital and cycle 2 program administrators to resolve the contract differences were regularly delayed, canceled or postponed. At the same time, a flurry of communications between the hospital and Private Industry Council administrators trying to reconcile the requirements of each organization were also beset by mail- and procedural delays.

After several months, contract issues were finally resolved yet onset of cycle 2 was delayed further because the funding cycles of the PIC and the hospital now did not coincide. Finally at the end of April the hospital approved the program. Slated to begin in January 1999, after month-by-month delays in the start-up schedule, cycle 2 began in mid-June. By that time, TANF recipients had added six extra months to their 24-month time clocks. In addition, staff morale and enthusiasm for the program waned periodically during the wait, illustrating the "decay" that can accompany delays (Pressman & Wildavsky, 1973).

Staffing Coordination. New programs often place additional demands on the administrative and staff systems in the parent agency (Hogwood & Gunn, 1984) that delay and strain the quality of program operations. The implementation of most programs involves the hiring of new personnel and changes in the behavior of existing personnel. At the administrative level, coherence of parent agency and new program missions must be assessed. Administrators who agree about a program's goals may disagree about which people or organizational units should be running the programs (Pressman & Wildavsky, 1973). In the hospital-based program, many staff positions changed after the merger. The Project Director's main allegiance now was to the hospital, not to the original organization. Her expertise, influence, and labor were called upon to assure the existence of cycle 2 of the work program. Only because of her professional prestige was she able to maneuver a downsized cycle 1 specialist into the Program Coordinator position and secure enough space for program activities.

At the staff level, new programs require alterations in interpersonal relationships and work habits, often contributing to staff resistance (Sabatier & Mazmanian, 1995). When programs are designed, the core staff is likely to be small and committed to the mission of the new program. By contrast, the new staff, most of whom will be recruited into lower-level positions, seldom have the same sense of ownership or level of enthusiasm as the founding group (Patti, 1983).

The shelter program and the certified nursing program were forced to integrate an influx of front-line practitioners within a 1–2 month period of time. While both hired competent new professionals, days were spent orienting and training the new personnel at the same time as old and new staff were expected to spend time in recruitment and training activities. These concurrent orientation and role demands strained continuity in applicant assessment practices and delayed delivery of program content. In such situations, agencies may resort to creaming and take only the clients who are easiest to handle, or have the best fit with the professional aspirations of the caseworkers in the agency (Schneider & Ingram, 1997, p. 139). While we did not find evidence of creaming, strains between professional aims and TANF program requirements were evidenced by staff in their program assessment and case management practices.

Initial assessments of participant eligibility for services and training programs offered previously by the four agencies studied were skewed in favor of psychosocial and motivational characteristics. We found that even staff members trained in professional social work were not able to accurately assess program appropriateness for many TANF recipients referred by the CAO. Global post-interview evaluations such as “enthusiastic,” “very appropriate,” and “wants to be in this program” were generally based on the staff member’s gut-level responses to the applicant’s personal presentation. Such responses are considered unreliable and invalid in vocational assessment literature (Schmidt & Hunter, 1998). Consequently, when these traditional behavioral markers did *not* correlate with applicant enrollment, much less success in the program, staff professionals felt stymied and their morale suffered. Ultimately, both nursing-related programs and the family agency moved to job-focused assessments oriented particularly

for individuals moving from welfare to work (Iversen, 1998). These new assessment formats emphasized prior work experiences and job-specific skills (Janz, 1982) and job-related scenarios that elicited how applicants would respond on the job (Huffcutt, Roth & McDaniel, 1996).

We also found that program professionals had to make similar adjustments in their training and case management interventions with participants during program operation. Staff in all four programs expanded their examination of structural barriers to program and work success such as childcare, transportation, and emergency financial needs. Program personnel found they needed much more knowledge about welfare legislation and benefit qualifications as well. As one staff member said, "I've turned from a social worker to a benefits specialist." Such knowledge, including how to access the Earned Income Tax Credit and emergency utility assistance, is considered critical to participant success (Rangarajan, Mekstroth & Novak, 1998).

New staff role requirements, similar to those experienced in county assistance offices, confused participants and workers alike. The family agency staff members were called "Job Coaches," although they felt uncertain about exactly what the title meant. Such difficulty with role clarity might jeopardize the mutuality and trust that is built in the client-worker relationship through openness and provision of information.

Adding to implementation stress, staff in all programs programs retained simultaneous commitments to other projects in the agency. As Pressman and Wildavsky (1973, p. 99) noted, staff participants may agree with a proposal, have no contradictory commitments, and not prefer any alternative programs, but they may have other projects of their own that demand time and attention. Problems of staff in implementing a change are often ignored. Changes frequently add new elements to a job, yet proponents of the change may not reallocate tasks or even recognize the increased load (Brager & Holloway, 1978).

In cycle 1 of the hospital-based program, welfare-to-work staff planned to spend one day a week on the program and four days in their original full-time positions. Each found that their program time amounted to at least two days a week, but the requirements of their primary position were not altered. Similarly,

in the family agency each worker started by conducting one half-day assessment per month. Moreover, the agency contracted initially with only one welfare-to-work program provider. Within a year, the agency held contracts with three providers and staff members conducted at least one assessment per week with little to no relief from their regular full-time service schedule.

Conclusions and Recommendations

This paper reported findings about barriers to TANF policy implementation based on field research in four Philadelphia-area welfare-to-work programs: a union-based certified nursing assistant program; a hospital-based (non-certified) specialty care program; job programs sponsored by a homeless shelter; and a family agency conducting assessments for local TANF programs. The findings suggest that principles of policy implementation are more applicable than human and social capital constructs to understanding the current barriers to participation and success in welfare-to-work programs under PRWORA and TANF policies. Case examples illustrated how faulty policy logic, organizational and personnel incompetence, and inadequate inter- and intra-organizational coordination resulted in severe delays and strains in TANF programs. Most important, these “invisible” implementation problems penalized TANF recipients severely as they tried to move from welfare to work, depleting their time-limited assistance as they waited for programs to start or finding themselves in inappropriate programs. Notably, most of the problems could have been predicted and prevented through attention to the significant body of literature about policy implementation developed over the past twenty-five years.

The author contends that TANF recipients should not be penalized for delays caused by policy implementation, thus changes in the 24-month TANF time limits are the most critical policy target. Accordingly, coalitions of program staff, program participants, agency officials, employers, and funding representatives can advocate for retroactive elimination of the 2-year penalty and extension of recipients’ 2-year time limits by the number of months individuals lost because of delays in program start-up or inappropriate referrals. In Pennsylvania, the 24-month limits should be suspended until the Department of Public Welfare is

technologically able to collect data that identifies TANF recipient characteristics and assistance patterns sufficiently to make appropriate matches with work programs, and until they can also collect case record data on families no longer receiving assistance in order to better balance program supply with recipient demand. The 24-month limits should also be suspended until County Assistance Office personnel are professionally qualified to identify recipients' needs and refer them to appropriate programs and services; until training providers are fully funded and operative; until program staff are trained in vocational assessment (for full discussion, see Iversen, Lewis & Hartocollis, 1998); until employer demands are systematically coordinated with program funding requirements and skills content; and until the disconnect between program supply and TANF recipient demand is fully understood.

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NOTES

1. In July 1999, the name of all Private Industry Councils was changed to Work Development Corporations to conform to parameters of the Workforce Investment Act of 1998. In this paper, we used the name as it was during our field research.
2. I wish to acknowledge the influence of the diagrammatic work of Raffel, Mooney, & Finney (1999) for the model presented here.

