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October 2, 2020

## **Re: Request for Information on Federal Coordination to Promote Economic Mobility for All Americans**

United States Interagency Council on Economic Mobility:

The American Public Human Services Association (APHSA) respectfully submits these comments in response to the Request for Information on Federal Coordination to Promote Economic Mobility for All Americans (RFI 2020-15319).<sup>1</sup>

### **Role of the Interagency Council on Economic Mobility**

APHSA strongly supports the commitment of the Interagency Council on Economic Mobility (the “Council”) to create an accountable and effective structure for interagency collaboration and to use federal authorities to promote family-sustaining careers and economic mobility for Americans with low incomes.<sup>2</sup> Unearthing the deeply rooted, multilayered barriers to economic well-being faced by millions in our country is a marathon, not a sprint, and the long-term success of the Council rests on its ability to create lasting structures of interagency collaboration. Accordingly, APHSA’s response focuses less on individual actions that the Council should take and more on its approach to understanding economic mobility and areas of investment that need to be continuously explored to achieve the greatest impact.

As the Council considers the best way to establish and achieve its long-term objectives, we urge the Council not to separate the work from the on-going health and economic crises faced within communities today, especially by communities of color and families experiencing generational poverty. The COVID-19 pandemic has further exposed the open wounds that our systems of support must heal to ensure everyone has a chance to meet their potential. Food insecurity, housing evictions, child care disruptions, and deepening health disparities are just some of the consequences being felt today by more people than ever. Left unaddressed now, the effects will have lasting repercussions on the mobility of current and future generations of American workers.

Understanding the current moment and the hard work ahead to achieve opportunities for economic mobility for all people, the Council must be thoughtful in establishing a governance structure and roadmap that anchors its mission in an understanding of root-cause problems, identifies the solutions

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<sup>1</sup> APHSA is a bipartisan, nonprofit membership organization representing state and local health and human services agencies that seeks to advance effective policies and practices that support the health and well-being of all children and families. The following comments were gathered through written and verbal feedback from APHSA’s Leadership Council, which is comprised of state and local human services executives, as well as our affinity groups comprised of administrators responsible for implementing economic assistance, workforce development, nutrition supports, child welfare, and related human services.

<sup>2</sup> U.S. Department of Health and Human Services, Administration for Children & Families. “The Council on Economic Mobility is Seeking Input.” July 24, 2020. <https://www.acf.hhs.gov/blog/2020/07/the-council-on-economic-mobility-is-seeking-input#:~:text=The%20Council%20seeks%20to%20create,mobility%20for%20low%2Dincome%20Americans>.

*American Public Human Services Association advances the well-being of all people by influencing modern approaches to sound policy, building the capacity of public agencies to enable healthy families and communities, and connecting leaders to accelerate learning and generate practical solutions together.*

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that get to these roots, and operationalizes these solutions in ways that foster on-the-ground impact. Through coordination across programs and funding streams, federal agencies create the environment by which state and local implementers can innovate to build modern delivery systems that work in concert with each other through whole family approaches. Recent interagency efforts in related policy settings provide a framework and proof points of strategies that work to foster sustainable mechanisms for collaboration, as evidenced in the Government Accountability Office's Report *Implementation Approaches Used to Enhance Collaboration in Interagency Groups*.<sup>3</sup> For example, the [Federal Interagency Reentry Council](#) uses its six broad consensus goals as guiding principles when prioritizing specific activities of the Council. Similarly, the [U.S. Interagency Council on Homelessness](#) worked through its Council Policy Group to develop recommendations of strategic interagency opportunities for adoption among all members.

Drawing on this past work, the Council should establish guiding principles for its work that demonstrate the group's commitment to understanding the multifaceted barriers to economic mobility and the levers that can be pulled to overcome them. Specifically, the goals of the Council should:

- Be rooted in a comprehensive understanding of economic mobility that drives the strategies and stakeholders leveraged to achieve positive impact.
- Include an explicit commitment to understand and dismantle structural barriers to economic mobility due to race, location, income, and other key factors.
- Harness the strengths and take strategic aim at the weaknesses to align federal funding streams and promote making systems responsive to community needs.
- Maintain a clear North Star that defines the desired outcomes and benchmarks of equitable economic mobility for all families and communities and the strategies for systems to collectively drive toward those outcomes.

## Understanding Economic Mobility and the Federal System that Aims to Advance it

To create meaningful opportunities for economic mobility, we must promote the factors in communities that enable families to live at their full potential. Policy solutions must recognize that economic mobility starts with ensuring people have a safe home to live in, enough nutritious and desirable food to eat, and access to quality and affordable child care, education, and health care. These are the building blocks that equip all of us with the tools we need to support our family and contribute to the economic engine of our communities.

Yet, we have significant work ahead to ensure our systems of support lay down the tracks that lead to opportunity and economic mobility for all people. Too many Americans, especially those from communities of color, have been routinely and systematically disconnected from those tracks—effectively left stranded at the platform. The data are clear: we have failed to connect the tracks needed

<sup>3</sup> U.S. Government Accountability Office. *Managing for Results: Implementation Approaches Used to Enhance Collaboration in Interagency Groups*. February 2014. <https://www.gao.gov/assets/670/660952.pdf>

to increase intergenerational mobility and rates of upward mobility, especially among Black, Brown, and Indigenous Americans, and within areas of concentrated poverty.<sup>4,5</sup> Furthermore, rising income inequality continues to widen the gap between families in poverty and those at upper-income levels, leaving people experiencing poverty and adversity further behind.

With bold and decisive action, the Council can counteract the structural barriers to economic mobility that our own systems have too often fostered. Strict asset tests within human services programs often stand in conflict with the critical efforts of these same programs to support wealth building, despite the fact that the intergenerational passthrough of financial assets remains one of the most effective ways to support economic stability for our children. Work requirements within means-tested programs, intended to encourage employment, often have the unintended consequence of placing people in unstable, unskilled labor positions that provide little opportunity for career growth. And the disparate representation and treatment of children from various marginalized identities in the child welfare system point to the continued work that needs to be done to equitably support child and family well-being. Similar patterns within both historical and current housing, health, food, and related systems reinforce that federal policies can inhibit economic mobility when they fail to be centered around outcomes that work.

We know the federal government can be a powerful force for positive impact when agencies work together through a shared vision. Federal leadership to implement the Workforce Innovation and Opportunity Act (WIOA) has been pivotal in aiding state and local agencies in efforts to strengthen the nation's public workforce system and ensure access for all workers. More recently, the Supplemental Nutrition Assistance Program (SNAP) has proved yet again to be a critical countercyclical tool to combat rising food insecurity during the pandemic. Furthermore, through programs such as Pandemic EBT, SNAP agencies and their education partners have shown they can rapidly innovate to meet unprecedented challenges that test our traditional public delivery systems.

All of this broader understanding of economic mobility—and the ways in which federal policy can influence it—offers insights that should inform the way in which the Council defines and measures it.

- First, the Council must recognize that primary prevention is a key ingredient of any strategy to increase economic mobility and we must do the hard work needed to quantify the return on investment of upstream preventive services on removing structural barriers to long-term mobility.
- Second, when measuring mobility in economic terms, the Council should seek to identify common benchmarks that can be adopted across agencies that allow policymakers to measure progress, not just within systems, but across them.
- Last, the Council should acknowledge that economic indicators are just one measurement of progress toward real and sustainable mobility from poverty. Equally important to long-term

<sup>4</sup> Chetty, Hendren, Jones, Porter. Race and Economic Opportunity in the United States: An Intergenerational Perspective. Opportunity Insights. March 2018. <https://opportunityinsights.org/paper/race/>

<sup>5</sup> Chetty, Hendren, Kline, Saez. The Poverty and Inequality Report 2015. The Stanford Center on Poverty and Inequality. [https://inequality.stanford.edu/sites/default/files/SOTU\\_2015\\_economic-mobility.pdf](https://inequality.stanford.edu/sites/default/files/SOTU_2015_economic-mobility.pdf)

mobility, we must help foster conditions that advance a person's sense of agency over their life course and their sense of belonging within their community.

## Impact Areas to Increase Economic Mobility

Built on APHSA member experiences in delivering human services on the ground, we propose three specific impact areas to advance economic mobility goals. These impact areas—advancing systems that promote economic mobility, removing roadblocks to economic mobility, and accelerating efforts that support economic mobility—should take a 360-degree view of the ways in which the Council can advance this body of work. Within each of these impact areas, we offer specific strategies the Council should consider when setting its agenda.

### *Advancing Systems that Promote Economic Mobility*

Federal interagency coordination is a critical step forward to align systems that work together to increase economic mobility. Federal agencies play a pivotal role establishing the regulatory and administrative framework within which state and local implementers operate to deliver services that promote economic mobility. Beyond any individual policy change, the Council can advance systems that promote economic mobility by orienting this broader federal infrastructure to work harmoniously to encourage innovation and impact.

First, the Council can leverage this framework to test new approaches to improve economic mobility outcomes by **utilizing demonstration and waiver authorities**. For example, Section 17(b) of the Food and Nutrition Act and Section 1115 of the Social Security Act provide discretion within SNAP and TANF, respectively, for federal agencies to approve pilot programs that test changes in reporting and measurement to inform longer-term efforts to modernize the ways in which programs support economic mobility and well-being. The Council provides a unique interagency lens through which the federal government can explore the application of these authorities across funding streams to support alignment of systems to promote mobility.

Furthermore, the Council can guide its investments and those of state and local agencies by **advancing the use of evidence frameworks** in service delivery. Recent federal initiatives such as the *Pathways to Work Evidence Clearinghouse* provide helpful tools to assess the effectiveness of interventions and drive evidence-informed decision making. Grounding these frameworks in the common outcomes and benchmarks of progress established through the Council and applying an equity lens to evaluation methods can ensure that evidence building is aligned across agencies to focus on strategies that support economic opportunities and reduce structural inequities within systems. Cross-agency strategies that dedicate funding for evaluation of economic mobility initiatives by granting state and local governments resources to build their data and evaluation capacity can help to accelerate these efforts.

The Council can also play a helpful role in advancing systems that promote economic mobility by **providing cross-agency guidance and support** for state and local agencies. Differing rules, eligibility standards, and procedures across programs within the Council's purview create a complex maze that families must navigate—and one for which state and local agencies face an uphill battle to weave

together. The Council should map where these differences exist and prioritize where alignment of systems can have the greatest impact, using input from not just state and local implementers but from members of the community as well. Taking this approach not only helps to shine a light on where policy changes are needed but also should be used to explore where agencies can work together to issue joint guidance, technical assistance, and contracting opportunities focused on achieving shared outcomes across systems.

If policy alignment is at the heart of advancing federal systems that promote economic mobility, **aligning information technology** represents the backbone that delivery systems rely on to implement that policy change. While children and families have many touch points with a range of federally funded efforts to support economic mobility, programs within human services, housing, workforce, education, health, and related sectors are governed by different rules and cost-sharing requirements that complicate implementation of modern, streamlined approaches to service delivery. Integrated IT funding across sectors is a wise investment; this funding provides a means of funding business designs, processes, and automation that reflects whole family solutions. The Council can play an important role to advance funding opportunities that facilitate technology improvements that enable blending and braiding of services to address whole person needs. In the process, the Council should lean into identifying best practices that put equity at the center of IT modernization efforts, utilizing data collection and sharing to support and measure whole family outcomes.

### ***Removing Roadblocks to Economic Mobility***

Federal policy can have a powerful effect on breaking down systemic barriers to economic mobility and the Council holds an influential position for moving the levers of greatest impact. The Council should be clear and intentional in filling the gaps in the building blocks of well-being and forge policy solutions that reinforce a strong and stable foundation for economic mobility for all Americans.

The collection of agencies within the Council responsible for setting strategies to advance both workforce and child well-being systems provides a tremendous opportunity to **reimagine the role of child care** as a tool for economic mobility. The COVID-19 pandemic has revealed the fundamental importance of available, safe, and affordable child care in our communities. Structural changes, however, are occurring within the child care market that require policymakers to innovate to preserve and increase access. We must equip parents with the necessary tools to succeed as caregivers and breadwinners and support a child care system that can be nimble in meeting the wide range of work arrangements parents experience while nourishing their children's early development. The Council should look across agencies to identify priority areas of collaboration to align child care funding in a way that complements work and economic supports to help children and parents reach their potential.

The Council should **seek out interagency strategies that deploy two-generation approaches to create whole family pathways for economic mobility**. The combination of the Council's place-based and people-focused supports reinforces the physical, social, and emotional building blocks of well-being that enable families to succeed economically. This applies to the parents we serve and their children. Moving upstream in our service delivery pathway is a means to disrupt cycles of intergenerational poverty. The

Council plays a crucial role in establishing a two-generation approach through its work, recognizing the critical interplay of primary prevention and workforce supports through family-centered services. This effort calls upon the Council to critically examine how prevention services and work programs function, or not, in concert with each other to maximize impact. Council's efforts should include solutions and policies that aid current, on-going community efforts along with best practices and models for working across federal funding streams to translate these principles into action.

Last, the Council should carefully **review ways work supports and employment and training programs can be used to better support the job readiness, retention, and advancement of workers.** Work programs that exist within the Council's agencies follow differing sets of rules that support workers in preparing for, engaging in, and retaining work. These rules often prioritize verifying participation in eligible activities within specified time limits. This can unintentionally result in services designed to meet compliance requirements rather than cater to participants' strengths. Using a growing evidence base and promising practices in the field, the Council should develop federal strategies supporting effective delivery systems that meet the needs of individuals with the appropriate resources and services to help them succeed in the workplace. This includes fully investing in and integrating trauma-informed services, mental health services, substance use supports, and other areas of need. These strategies permit agencies on the ground to prioritize outcomes over outputs and pull from a menu of soft skills development, training, education, behavioral health, and employment services that match the needs and abilities of individuals. In doing so, the Council should take the necessary actions to change rules and regulations that run counter to these principles.

### ***Accelerating Efforts that Support Economic Mobility***

Equally important as efforts that remove roadblocks to economic mobility, the Council can modernize the way income supports and workforce systems support families by accelerating on-going efforts that promote economic mobility. It is critical that the Council work across agencies to create a system providing seamless transition of supports that generate strong and stable pathways toward upward mobility.

This effort begins with **advancing policies that invest in people as they invest in themselves.** Too often, income support rules put breadwinners in an untenable position of making short-term sacrifices in order to invest in their long-term career development. As opportunities for wage growth present themselves, the earning value of work and education is offset by the loss of benefits families rely upon to meet their basic needs. Without the social and economic supports parents need to weather this period for themselves and their children, these benefit cliffs obstruct their path towards economic well-being. Benefit cliffs take many forms and have been thoroughly documented within child care subsidies, SNAP, Medicaid, and housing vouchers, among other programs. Recognizing the innate interest of individuals to acquire agency over their life's course through family-sustaining work, the Council should promote policies that mitigate benefit cliffs within income support programs and support strategies that help families understand how to navigate through them to achieve their economic goals.



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In addition to lining up policies in a way that supports families in their path to upward mobility, the Council must also **advance delivery systems that provide seamless connections between services that support career advancement.** As members of our communities develop the necessary skills to engage in work and move up their career ladder, our delivery systems must be agile in providing the wrap-around supports to guide each step of their way. Through the American Job Centers, there has been significant progress in providing one-stop-shopping for employment-related needs. The Council can play a critical role, ensuring as workers seeking career advancement progress through different touch points within workforce systems (such as TANF, SNAP E&T, WIOA, and others, that services stay centered on the needs of the people served and span across funding streams without interruption. This work must be done at the individual and systems levels, and across agencies to develop customizable packages of credentials, training, and workplace learning that support upward mobility. A critical enabling factor in this work will be the ability of the Council to generate public/private partnerships between public agencies, community-based organizations, and employers to streamline and incentivize braiding of employment and training services and work supports across funding streams.

## Conclusion

We commend the Council for heeding the call to act collectively to promote economic mobility for all Americans. The charge for the Council is both ambitious and bold; yet the constellation of services and authorities housed within its eight participating agencies, when mobilized around a shared vision, has limitless potential to promote the enabling conditions needed for communities to thrive. We stand as a partner and ally to members of the Council in the difficult work ahead. When our work is centered on people and public service, building common ground, and partnering across sectors, there is no limit to what we can achieve to generate the conditions in which thriving communities are built on human potential.