THE CURRENT STATE OF TANF

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Abstract

This policy memo is addressed to the US Department of Health & Human Services (HHS) and details the issues surrounding the current state of TANF. Its legislative history is discussed in- depth with its problem-symptoms, focusing on TANF's ineffectiveness in aiding families, and consequences that are borne by its recipients. The causes, which include factors of government failure and ineffectual policies, are analyzed with data and historical evaluation. To resolve these problems, five policy alternatives are proposed with consideration of their benefits and tradeoffs. All presented policy solutions meet the HHS' mission and goals, and a final recommendation is made supported with evidence.

Introduction

TANF ("Temporary Assistance for Needy Families") is a need-based welfare program that provides cash assistance to families, single parents, and nonparent relatives to financially support children under the age of 18. TANF was implemented in 1997 to accomplish four main goals: provide aid to household families, end the dependency on government assistance by promoting work participation, prevent and reduce out-of-wedlock pregnancies, and encourage the formation and maintenance of two-parent families (OFA, 2021).

Since its implementation, TANF has not fully achieved its goals. The main problem- symptoms include ineffective aid to TANF recipients, ineffective work requirements, and insufficient distribution of TANF benefits to families. In addition, some impacts of TANF's inadequacy consist of children and families experiencing housing instability, facing "benefit limbo", and suffering from health problems. These issues stem from government failure and various economic factors, producing outdated policies and restrictive state regulations, which can be remedied by government intervention through new distributive and regulatory policy changes. To rectify these causes, some sensible solutions are available which include, improving eligibility criteria to expand the TANF caseload, reconstructing the current TANF funding structure, and implementing state accountability measures. The objective of these solutions is to get TANF to return to its inceptive principles, as its current form has diverged from its four main goals.

To achieve HHS' mission of enhancing the health and well-being of Americans, the department must take into consideration these problems with TANF, along with its consequences, causes, and policy solutions to provide effective health and human services to the needy public.

Background

In 1996, the Personal Responsibility and Work Opportunity Act ("PRWORA") was signed by Bill Clinton into law, fulfilling his presidential campaign promise to "end welfare as we know it" (Falk, 2021a), and as a culmination of public demand for welfare reform. The PRWORA was championed by Congressional Republicans, who thought that Aid to Families with Dependent Children ("AFDC"), the comprehensive welfare program at the time, disincentivized employment for welfare recipients. Subsequently, House and Senate Republicans passed welfare reform through PRWORA repealing AFDC and replacing it with TANF. With an emphasis on their four goals, the creation of TANF sought out a "work first" driven approach to welfare instead of an "education first" approach. (Wu, 2009). TANF's most substantial difference from AFDC was that it was a fixed block grant of $16.5 billion disseminated to every state, instead of being a continuous reimbursement (Falk, 2016). The new program would also have income restrictions and work requirements, but states had the flexibility on how to spend these funds and determine recipient eligibility. For example, in Maryland, TANF is also called Temporary Cash Assistance (MDHS, 2021), and has a mandatory requirement of child support compliance. Whereas in California, TANF is called CalWORKS (CDSS, 2021), and there is no child support requirement.

Problem Symptoms

Federally, TANF has remained largely unchanged since its enactment in 1997, and it has yet to accomplish the program-desired four goals. One problem-symptom has been TANF's ineffectiveness in aiding its recipients. Since 1997, TANF's block grant amount has remained at $16.5 billion with no adjustments for inflation or changes in the poverty level. As a result, the real value of TANF has declined and in every state, benefits are at or below 60% of the poverty line and fail to help families escape deep poverty (Safawi & Floyd, 2020). Meanwhile, AFDC lifted a family of three 70% above the poverty line (ASPE, 2021). For instance, a TANF recipient in Maryland can no longer receive cash assistance if their net income is above the benefit amount. So, for a household of two, the income earner cannot make more than $559/month (People's Law, 2021). The full benefit schedule shows that state benefits have not been adjusted for inflation, and impoverished recipients remain in poverty, unable to attain jobs with wages that are slightly above the income limits (See Appendix A). With benefit amounts being low and eligibility criteria that relegate recipients not to receive a living wage, it is difficult to believe cash assistance is effective in helping the poor break out of the cycle of poverty. "The design features of the cash assistance program help keep poor people poor, beginning with low benefits which is a little more than the annual household income in Nigeria" (Campbell, 2014). Even with the addition of the Supplemental Food and Nutrition Program (SNAP), which provides recipients with affordable food, families are still unable to meet a satisfactory standard of living comparable to those of third-world countries.

Furthermore, the ineffectiveness of the mandatory work requirement for TANF has been considered as a problem-symptom, with mixed results. TANF statute requires 50% of their TANF recipients to be employed or participating in the work activity created by the state for a minimum number of hours (Falk, 2021b). However, the standards are usually lower for many states due to credits, in the form of percentage points, being given for states that reduce their caseload, and the OFA also releases this data. The data points of work participation for "All Families" and "Two- Parent Families" were graphed through Excel (See Appendix B). Work participation rates have risen positively from 2011-2017 but have seen a massive decrease since. One explanation has been the ability for TANF recipients to find low-wage jobs, with national unemployment rates at a historical low right before the pandemic. However, in terms of TANF effectiveness, recipients are only finding low-quality, unstable jobs and are not prepared enough to be skilled workers with the current work requirements.

Another problem-symptom of TANF can also be noted by its decreasing scope in the number of TANF recipients served or "caseload" in relation to increasing poverty. During the 2008 economic crisis, TANF failed to reach needy families, and TANF caseloads were unchanged or fell during the recession. Comparing AFDC, where 68 out of every 100 families in poverty received benefits in 1996, and TANF, where only 23 out of every 100 families received benefits in 2019, TANF has neglected to serve impoverished families in great economic emergencies (Meyer & Floyd, 2020). The difference can be better visualized through the graph produced by the Center on Budget and Policy Priorities, which shows cash assistance caseloads declining significantly from 1979 to 2019, even during periods of national economic hardship (See Appendix C).

Consequences

The consequence of TANF's ineffectiveness and its heavy-restrictive policies leaves the recipients in "benefit limbo" (Campbell, 2014). Benefit limbo is described as remaining in the "cycle of poverty" due to TANF's rules that force families to be dependent on government assistance. The recipients must follow the program's guidelines or risk a loss of benefits. For instance, Georgia has asset limits in addition to the income limit. Georgian families must have countable assets of less than $1,000 (GDHS, 2021). Countable assets are usually cash, funds in checking and savings accounts, and—some states—include 401K's and IRA's. Criteria limitations prevent recipients from saving for future or emergency funds. The poor stay impoverished because of these repressive policies and are forced to remain on government assistance. Thus, they are stuck in "benefit limbo"; otherwise, they must survive on their own.

The impacts of TANF's problem symptoms, such as its ineffectiveness and inequitable outcomes, cause TANF to fall short of its first goal of "helping families care for their children in their own home". Particularly, housing issues arise because of stagnated TANF benefits. Housing costs such as rent and mortgages continue to exponentially increase, while states only give TANF benefits a minimal increase, and the deficit between cash benefits and housing costs continue to widen (See Appendix D). Per the Center on Budget and Policy Priorities, the median fair market rent rose from $543 to $1015, while TANF benefits only rose from $377 to $492. This minimal benefits increase has impacted families to housing instability, such as evictions, foreclosures, and homelessness. The Department of Housing and Urban Development helps TANF recipients through housing vouchers and Section 8 housing, but only 17% of TANF recipients receive this housing assistance (Safawi & Floyd, 2020). Because of the discrepancy between TANF benefits and housing costs, housing assistance from states is insufficient to help in-need families. Examining equity criteria, inner-city neighborhoods are predominantly affected by low TANF benefits and high housing costs. For instance, in Milwaukee, around 1 in 14 renter-occupied houses are evicted annually (Desmond, 2012). This leads to in-need tenets asking for housing assistance, but the caseload size burdens municipalities, resulting in denied applications. TANF's current benefit amount cannot cover housing costs, and the government's housing programs are overwhelmed, which exacerbates inequity against impoverished people.

Due to financial poverty, recipients are more likely to develop physical and mental health problems. Excessive stress and adversity in the forms of limited food and shelter can negatively affect the overall health of TANF applicants. Depression, diabetes, and heart disease are the most common diseases associated with economic hardship and adversity (Shonkoff et al., 2020). To escape from poverty, TANF recipients find employment, but sacrifice adequate childcare. These factors further the negative inequity for impoverished communities.

Causes

The causes of TANF's ineffectiveness can be categorized into two parts: financial problems and government failure. Inflation has reduced TANF's effectiveness. First, as stated in TANF's problem symptoms, TANF's nominal value has remained at $16.5 billion due to its status as a fixed block grant. This was purposefully implemented to reduce the continuous reimbursements done as was the case during AFDC. However, the 2008 Recession and continuous inflation have reduced the real value of TANF's grant amount. Accommodating for inflation, a dollar today is now only worth 57% of a dollar in 1996, which means $16.5 billion today is only worth $9.4 Billion in 1996.

Most of TANF's financial issues have been caused by government failure on both federal and state levels. Due to direct democracy and representative government failure, disagreements between political parties resulted in the TANF funding to remain at its 1996 value. Even when TANF was first introduced, the bill was vetoed twice before a compromise was made by the 104th US Congress, with a Republican majority and Democratic president. The first version of the bill made cuts to Medicare, Medicaid, and child nutrition programs, while the second version cut childcare programs (Falk, 2021a). However, the Republican majority was still able to set the agenda with public and political pressure, keeping most of their policies in the bill, which Bill Clinton eventually signed through compromise.

Post-1996 TANF legislation has also been impaired by similar factors. Several attempts were made to reauthorize PWRORA to restructure the bill and adjust funding. In 2002, the Bush Administration attempted to reauthorize the bill by including funds to promote healthy marriages and provisions on state caseloads. However, the 107th US Congress was composed of a diametrically opposed Republican-majority House and Democrat- majority Senate. As a result, reauthorization failed and the TANF program with funding authority was merely extended 13 times from 2002 to 2006 (Falk, 2021a). Republicans and Democrats have had opposing agendas on TANF, with Republicans' refusal to maximize social welfare for all Americans, so reauthorization has been difficult – since 2010, only short-term extensions have been enacted 24 times since (Weidinger, 2018). Congress' stalemate on welfare reauthorization has led to TANF's decrease in value and continuation of its restrictive policies.

Another cause has been the prevalence of "child-only" families. "Child-only" families are households where only the child receives cash assistance, and the adult is ineligible. Three factors can make an adult ineligible: the parent is receiving disability SSI ("Supplemental Security Income"), the parent is an undocumented immigrant, or the adult is a caretaker relative (e.g., grandmother, uncle, cousin). In Fiscal Year 2013, 38.1% of TANF recipients were "child-only" households, compared to Fiscal Year 1988 with only 9.8%

of AFDC recipients (Falk, 2016). TANF was initially created to help impoverished single mothers join the workforce, and the presence of "child-only" households were hardly considered. These households only receive a fraction of the amount of TANF benefits intended to sustain a household of two. In many cases, the ineligible adult does not have enough income for themselves and the child, and a poor standard of living persists, ultimately harming the child. The Office of Family Assistance ("OFA") releases numerous reports that quantify the number of "child-only" households in the US. Specifically, *Characteristics and Financial Circumstances of TANF Recipients* records the number of "Families by Number of Adult Recipients", with zero adults representing a non-eligible/nonparent caretaker, one representing single-parent households, and two representing a two-parent household. The number of families with zero adults has steadily risen throughout the years, and an Excel graph was generated with the data points from 2010 through 2019 (See Appendix E). With the addition of a line of best fit, it can be assumed that "child-only" households will continue to rise which contribute to TANF's ineffectiveness in helping recipients.

TANF's inadequacy can in part be attributed to decentralization. TANF legislation gave states incredible flexibility in using federal funds to supplement their cash assistance programs such as work support, childcare, and tax credits. However, Kevin Brady (US Representative for the 8th congressional district of Texas) has described states having "excessive" flexibility and that TANF funds were being used as a "slush fund" (Skidmore, 2016). States are not using TANF funds at its optimal cost-benefit ratio, with cash being forgone to in-need families. Without federal regulation of TANF funds, states can use their funds on non-cash assistance programs. The Center on Budget and Policy Priorities created a pie-graph that shows the allocation of state funds, with only an average of 26% of funds going toward cash assistance (See Appendix F). Decreasing caseloads and the prevalence of "child-only" families have been caused by states' flexibility in TANF eligibility criteria. States have the discretion to control asset limits, time limits, whether to add drug tests, child support requirements, and any other requirements. In some states, the federally mandated work requirement disproportionately affects Black and Latino mothers, who are typically placed in low-paying jobs in the foodservice and childcare sectors, and they cannot lift themselves out of poverty (Floyd et al., 2021). Child support requirements lead to the breakup of families and Black parent absenteeism. Furthermore, Black and Latino families are significantly more likely to be sanctioned for not meeting requirements (Pavetti, 2018). The decentralization of TANF has ultimately led to more TANF ineffectiveness and inequity.

Policy Alternatives

The first policy alternative to remedy these policy problems is to maximize the number of eligible TANF recipients by reforming eligibility criteria, considering income thresholds and asset limits. Removing the eligibility criteria addresses one root cause of TANF's ineffectiveness in aiding recipients. TANF applicants are quite often barred from cash assistance due to barriers of access and harsh sanctions that cut benefits off in its entirety. For example, a study conducted by a Tennessee TANF agency found that nearly 30% of sanctions in the state were imposed in error (Pavetti, 2018). Furthermore, removing specific eligibility criteria widens the pool of eligible applicants, thereby helping families stay together and reducing the prevalence of "child-only" households.

The second alternative is to redesign TANF's funding structure to maximize its efficacy in lifting recipients out of poverty. This policy solution addresses TANF's ineffectiveness due to government failure. Particularly, TANF's block grant structure has made federal funds stagnant with no adjustment for inflation. "The block grant has lost about 40% of its value since 1996" (Safawi & Schott, 2021), meaning states have fewer funds to provide in cash assistance despite the high demand from recipients. Additional federal funding should also be provided during times of economic hardship and allocated only to help needy families. Instead of a block grant, a categorical or "conditional" grant is issued to be spent for specific purposes like cash assistance.

The third policy alternative is to implement state accountability measures to reduce wasteful state spending in the form of a quantity regulation. This policy alternative is justified by the fact that it directly addresses decentralization. States are not using their funds effectively and spend only a fraction of TANF funds to help recipients. "States spend a little more than one-fifth of their federal and state TANF funds on basic cash assistance" (Safawi & Schott, 2021), and they have taken advantage of the block grant's flexibility, but an accountability mechanism discourages states from using TANF dollars as a "slush fund" (Skidmore, 2016). In some cases, states use TANF funds to "replace existing state funds and use the remaining funds for purposes unrelated to providing a safety net or work opportunities for low-income families" (Schott et al., 2015). A state accountability system ensures that there are enough resources to achieve TANF's goals.

The fourth policy alternative is to enact or reform human service legislation outside of PRWORA, including the Child Care and Development Block Grant Act ("CCDBG") and the Emergency Rental Assistance Program ("ERAP"). States often use federal TANF funds for programs and services outside of TANF's intended investment areas. Besides essential cash assistance, states would spend around 69% of TANF funds on extraneous programs and services, such as childcare, refundable tax credits, Pre-K/Head Start, rental assistance, and child welfare (Schott et al., 2015). Enacting legislation that targets these service areas would disincentivize states using TANF funds to support their state programs, including the childcare subsidy program. The federal government provides the states' childcare funds through the CCDBG that authorizes the Child Care Development Fund (OFC, 2021). The states receive over $5 Billion in childcare funding, but the Government Accountability Office (GAO) found that only 14% of all federally eligible children received the subsidy in 2020 (GAO, 2020). In addition, the ERAP has strict eligibility criteria similar to TANF's policies. For example, the Emergency Assistance for Families and Children ("EAFC") program in Maryland requires families to have an eviction notice before receiving aid with their rent. The families must also disclose all their income and expenses with proof to be considered for rental assistance. It is then up to the discretion of a Human Services supervisor for approval or denial of rental assistance based on the pool of federal funds provided at the beginning of the fiscal year. Therefore, improving federal childcare and the emergency rental assistance program would disincentivize states diverting TANF funds into those respective service areas.

The final policy alternative to consider is continuation with the status quo and persist with another short-term extension of the existing bill. This would mean the overarching problem symptoms, consequences, and government failure would remain to affect TANF recipients.

Comparative Analysis

An outcome matrix (See Appendix G) was generated comparing all policy alternatives in terms of three criterion: effectiveness (in terms reaching TANF's intended goals), cost- effectiveness (in terms of benefit given the amount of federal dollars spent), and administrative feasibility (in terms of implementability). All policy alternatives were graded as "low", "medium", or "high" in terms of their criteria. A further analysis of the three criteria for policy alternatives is as follows.

Program Effectiveness

The policy alternatives were first assessed on their level of effectiveness, particularly its ability to accomplish TANF's intended outcomes. The first policy alternative, reforming eligibility criteria, is highly effective in lifting families out of poverty as eliminating income thresholds broadens eligibility and removes barriers of entry to those families. Adults who were once ineligible can join their children in the TANF household, reducing the number of "child-only" families and receiving the full intended cash benefit. As a tradeoff, the eligibility criteria cannot be too lax, as free riders, those who benefit from resources are ineligible for or did not pay into may take advantage by purposefully withholding financial information. For example, without an asset limit, applicants without earned income may withhold lottery winnings or inherited assets to reap TANF benefits.

The second policy alternative, redesigning TANF's financial structure, assessed relative to effectiveness, is highly effective in lifting recipients out of poverty. Adjusting TANF's real value indexed to inflation provides more funds for states to disburse to recipients and granting an emergency fund ensures funds would not run out in times of economic hardship. However, as a tradeoff, when the block grant amount is adjusted for inflation, states still have flexibility in spending these increased funds and have no accountability on usage of those funds. It is unlikely that states would increase their cash assistance expenditure and would instead fund their external programs.

The third policy solution of implementing a state accountability system addresses concerns of spending misuse. The accountability system effectively controls states' expenditures and reduces spending on programs that do not directly benefit the TANF applicant. Implementing an accountability system synergizes very well with redesigning TANF's financial structure to ensure the increased funds reach the recipient.

The fourth policy alternative of enacting legislation related to human services outside of PRWORA has a "medium" effectiveness in reaching TANF's original goals. However, due to the legislation targeting services that may affect some TANF recipients, it is difficult to state that this legislation can directly benefit all recipients holistically. Finally, in terms of effectiveness, the fifth alternative, or the status quo, continues to be ineffective in supporting needy families with all the known problem symptoms and consequences.

Cost-Effectiveness

The policy alternatives were also assessed on the criteria of cost-effectiveness. The first policy alternative, reforming eligibility criteria, in the form of introducing new legislation, is determined to be highly cost-effective and can benefit TANF recipients more in relation to the cost of reforming the current law. And the tradeoff is considered once the bill is passed and when the policies are enforced. It is difficult to measure the actual cost of introducing, passing, and establishing the "soft law", but the benefits granted to the recipients by means of an increased recipient caseload outweigh the hypothetical cost. On the other hand, HHS can internally change its eligibility criteria without the need for new legislation. The agency can change policy in the form of "action transmittals" because federal guidelines were left very broad. According to federal guidelines, applicants only needed to have a child 18 years of age or younger and have a low income (ECFR, 2021), but work requirements and other eligibility determinations were left up to the states. Thus, HHS can make changes to current policy in a highly cost-effective manner.

The second policy alternative is assessed as being "medium" on a cost-effective criterion. Redesigning the TANF funding structure requires implementation through new legislation. To increase the TANF block grant, the true cost can be determined using the current grant amount of $16.5 billion. Using an inflation calculator, the TANF block grant amount should be at least $28.4 billion today. The federal government needs to divert substantial funds to TANF recipients, and benefits may not be realized until much later resulting in average cost-effectiveness assessment.

The third policy alternative is also evaluated as being "moderately" cost-effective. Implementation of state accountability measures needs to come in the form of new legislation, but enforcement costs must also be considered. Accountability systems require an audit system and an authorized agency such as the U.S. Government Accountability Office ("GAO"). The GAO is responsible for assisting Congress in its oversight of the federal government including agencies' stewardship of public funds (GAO, 2009). The second policy alternative calls for an accountability system to be implemented to keep states accountable for their use of TANF funds. Creating this agency, hiring employees, and making new rules and regulations would cost an incredible amount; however, the benefit can outweigh the costs in the long run. Accountability mechanisms guarantee TANF funds are not used as a "slush fund" (Skidmore, 2016) and that funds directly reach the recipient. Thus, the cost-effectiveness of the state accountability system is rated as "medium" on a cost-effective scale.

The fourth policy alternative is considered as "low" on a cost-effectiveness scale. Reforming legislation outside of TANF in areas such as childcare and rental assistance can benefit some TANF recipients but does not affect all recipients. For example, some recipients do not need childcare or rental assistance, as seen in "child-only" households where these recipients do not pay rent and are children themselves.

Finally, keeping the fifth policy alternative of PRWORA is "low" on a cost-ineffectiveness criterion due to its known yearly cost of $16.5 Billion (CBPP, 2021) outweighing the benefit of helping needy families.

Administrative Feasibility

In terms of administrative feasibility, all policy alternatives, except the first policy alternative and the status quo, have low feasibility. The implementation of these policy solutions is only possible through a reauthorization bill. A reauthorization bill is a type of legislation used to reconsider expiring legislation and renew its legal power. TANF policy alternatives can be negotiated upon during reauthorization. In the past, TANF has not been reauthorized since 2010 and has gone through 24 extensions since then. Therefore, the administrative feasibility of implementing these policy alternatives is low based on the poor prospect of reauthorization and further depends on the willingness of Congress to agree on these policy alternatives.

The first alternative is determined to have a "medium" administrative feasibility because in the case where a reauthorization bill is not possible, HHS can intercede and make policy changes. The changes need to be approved by the agency's directors, but the eligibility criteria reform can be made with an evidence-based proposal.

Recommendations

The preceding policy solutions all have their own advantages and disadvantages. With these factors in mind, it is highly recommended that the Department of Health and Human Services consider a hybrid of these policy options and start by reforming current TANF eligibility criteria, but also consider the possible formation of a state accountability system and reformed TANF funding structure. The first policy alternative would be highly effective in accomplishing TANF's intended outcomes with medium feasibility, but HHS must also consider the fact that this policy option would work well in conjunction with increased funds along with insurance that funds do not go to waste by state expenditure. As a result of improved eligibility criteria, there will be an increase in eligible recipients, and a call for more funds which the other policy alternatives can only achieve. Furthermore, even though the formation of a state accountability system and a new TANF funding structure might have low feasibility, there is a chance that public opinion could affect legislators, as was the case when TANF was first introduced.

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Appendix

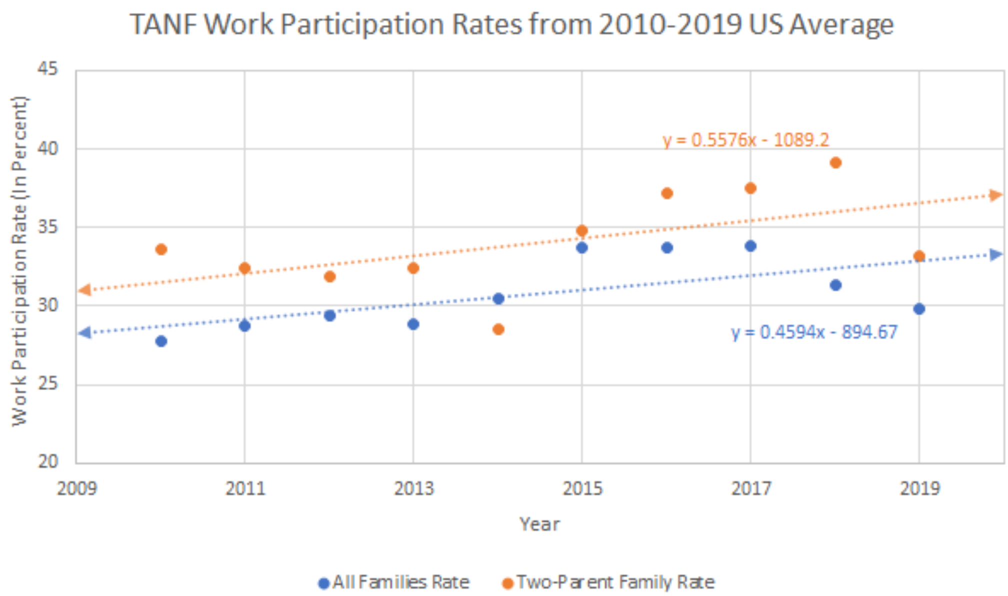
Appendix A: Temporary Cash Assistance (TCA) Benefits Schedule, Allotment Amount.

Monthly Allowable Amounts to be Paid Effective October 1, 2008

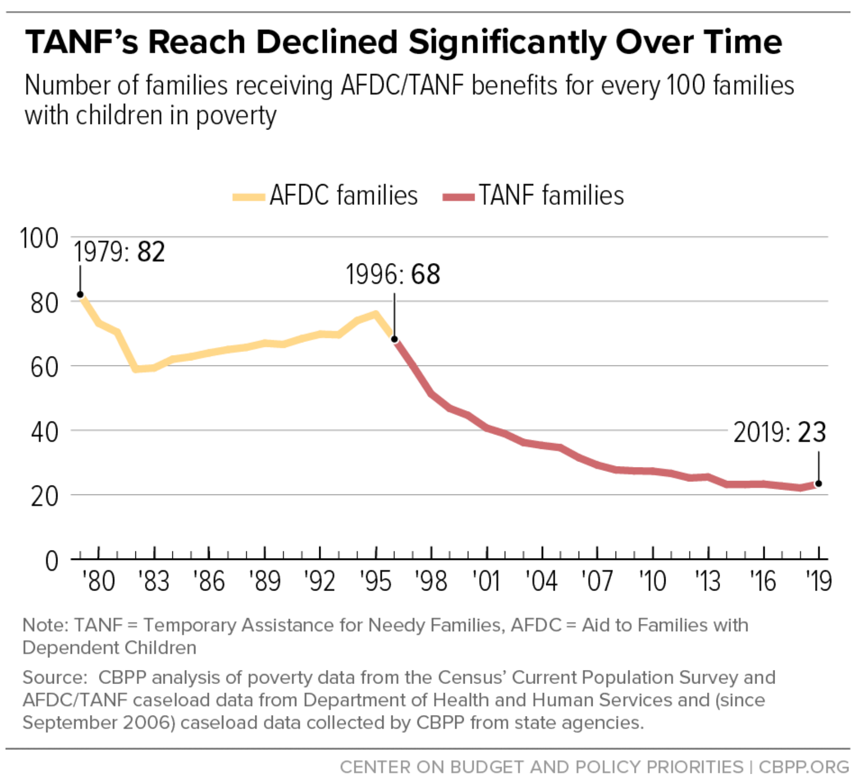
Monthly Allowable Amounts to be Paid Effective November 1, 2013.
Column B is based on household having zero income.

A. Number of Individuals in the Assistance Unit	B. Allowable Amount to be Paid	C. Allowable Amount for Determining Stepparent Eligibility (50 percent of Poverty Level)
1	$ 282	$ 478
2	559	646
3	624	813
4	755	981
5	875	1,148
6	962	1,316
7	1,081	1,483
8	1,191	1,651
9	1,285	1,818
10	1,389	1,986
11	1,516	2,153
12	1586	2,321
13	1,683	2,488
14	1,782	2,656
15	1,884	2,823
16	2,006	2,991
Each individual over 16	Add $118	Add $167

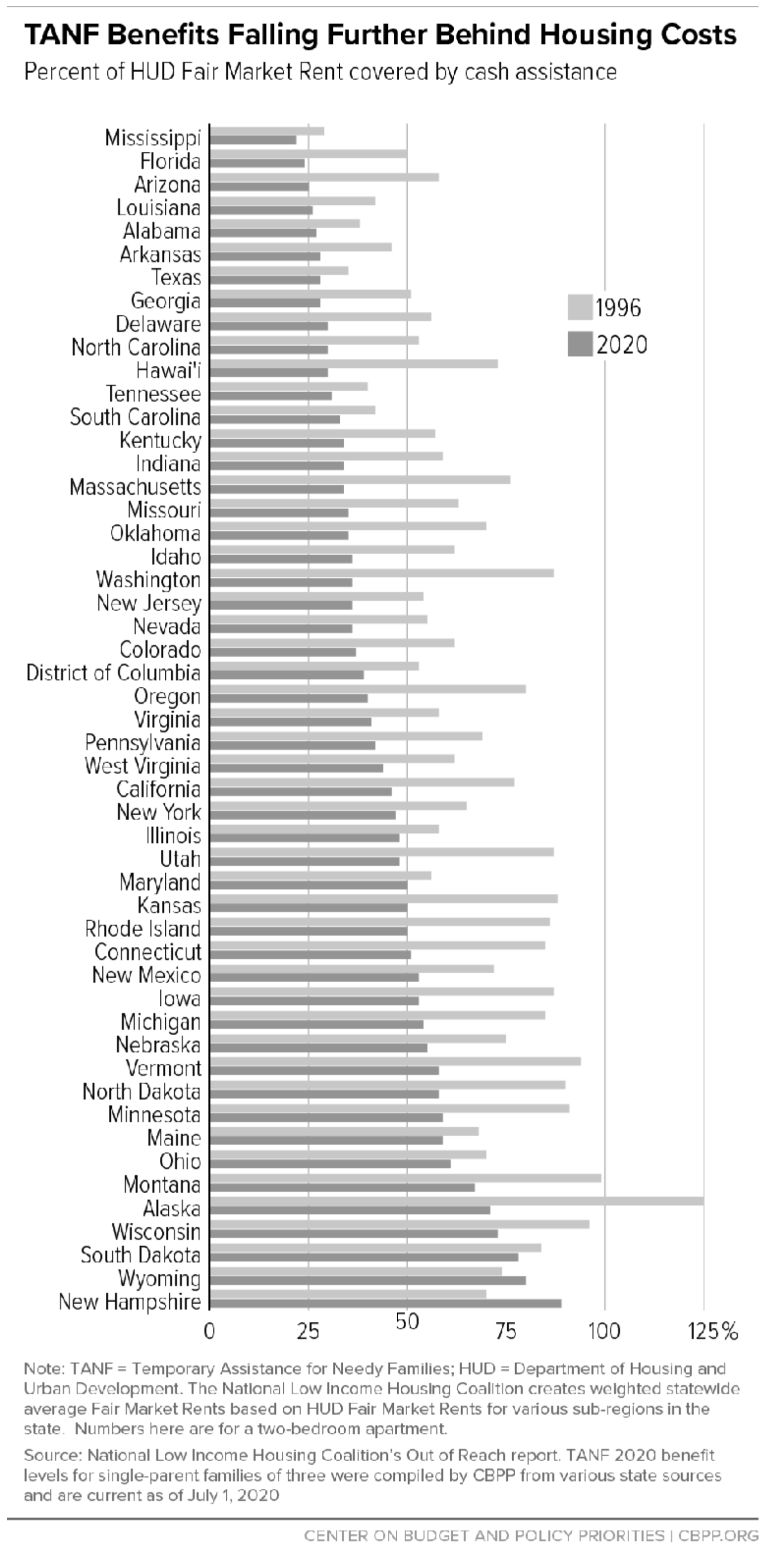
Appendix B: Graphical Representation of TANF Work Participation Rates 2010-2019 US Average (Source: Office of Family Assistance Work Participation Rate Dataset, Fiscal Year 2010-2019)



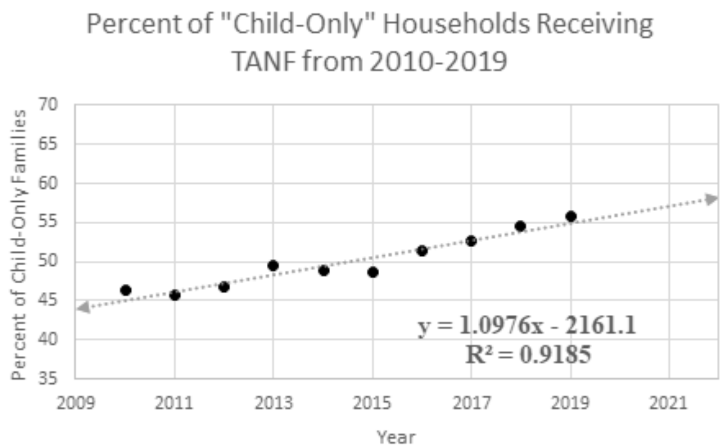
Appendix C: Graphical Representation of Total AFDC/TANF caseload



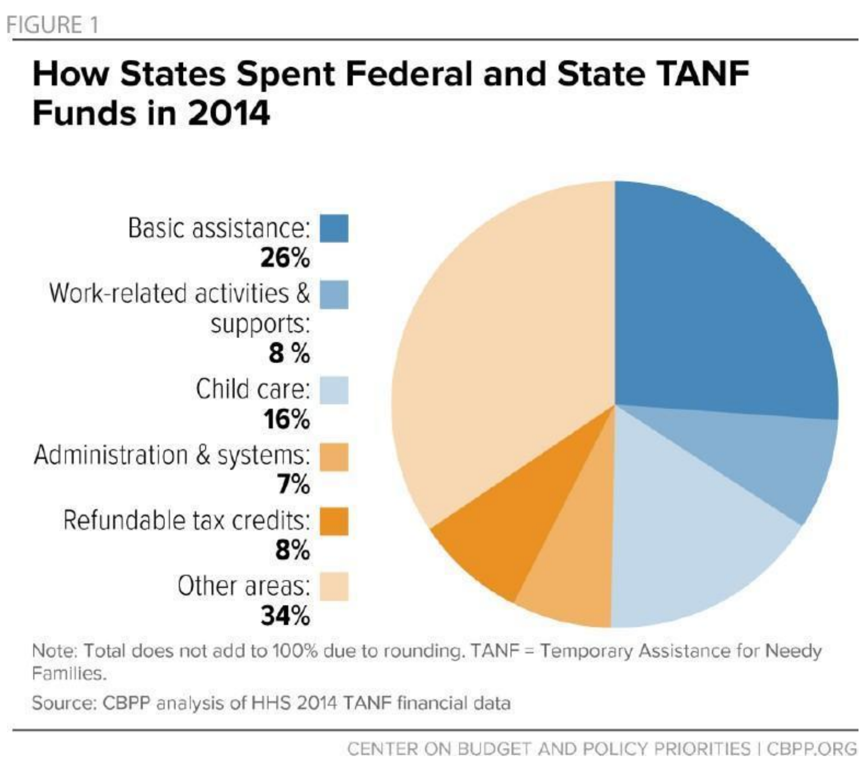
Appendix D: TANF Benefit Amount in Relation to Rising Housing Costs



Appendix E: Graphical Representation of "Child-Only" Households Receiving TANF benefits from 2010-2019 (Source: Office of Family Assistance TANF Caseload Dataset 2010-2019)



Appendix F: The Distribution of State Expenditure on Programs



Appendix G: Outcome Matrix of Five Proposed Policy Alternatives

	Effectiveness	**Cost-Effectiveness**	**Feasibility**
Alternative 1: Reform Eligibility Criteria	High	High	Medium
Alternative 2: Redesign TANF funding structure	High	Medium	Low
Alternative 3: Implement State Accountability Measures	High	Medium	Low
Alternative 4: Reform legislation outside of PRWORA (TANF)	Medium	Low	Low
Alternative 5: Status Quo (Extension)	Low	Low	High