

# Married ... without Means

## Poverty and Economic Hardship Among Married Americans

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## Introduction

More than 7 million married adults under age 65 in the United States have incomes below the austere federal poverty line—currently about \$23,000 for a married couple with two children). Among parents living below the poverty line and caring for minor children, 43 percent are married (and not separated). There are *more married* parents with incomes below the poverty line than there are *never-married* ones, and more food-insecure adults live in households with children headed by married couples than in ones headed by just a man or woman.

Yet, listening to policy elites, it would be easy to get the impression that poverty and economic deprivation are ancient history for married Americans—a major problem during the Great Depression, but not during the Great Recession or the several decades of rising inequality that preceded it. As historian Stephanie Coontz has noted, today there is “a sort of attitude ... magical thinking, that if we get you married, then you’ll be fine and we don’t have to worry about anti-poverty programs ... we don’t have to worry about child care.”<sup>1</sup> Scholars, pundits and other policy elites need to end their magical thinking about marriage and acknowledge the widespread nature of marital poverty and economic hardship.<sup>2</sup> This brief takes an initial step toward doing this by highlighting this neglected issue.

The invisibility of marital poverty is likely due in part to the cultural and political idealization of marriage in the United States. The sociologist Andrew Cherlin prefaced his recent book on the state of marriage in the United States with the observation that the United States is the only Western country in which you will find billboards and bus ads proclaiming that “Marriage Works.”<sup>3</sup> If you hold up marriage as a cultural ideal, as even most young people and non-married parents do, you may have a hard time reconciling the cultural ideal of married bliss with the reality that more than 7 million married Americans live in poverty.

A second major factor contributing to the invisibility of marital poverty is our obsolete poverty line and overall approach to measuring income poverty. In fact, as this analysis will show, if one updates the poverty line for increases in mainstream living standards over the last half century—an updating that still leaves it more than \$10,000 below the amount most Americans think of as the minimum families need to make ends meet—the number of married parents in poverty increases by 78 percent, and about one out of every two parents in poverty are married.

### Key Findings

- More than 7 million married non-elderly adults have below-poverty incomes.
- Among parents living below the poverty line and caring for minor children, 43 percent are married.
- Using a contemporary poverty line—a conservative one equal to \$33,686 for a family of four—13.5 million married adults have below-poverty incomes, and half of parents living below the poverty line and caring for minor children are married.
- Among prime-age (30-49) parents living below the poverty line and caring for minor children, 60 percent are married (and not separated).
- Married adults who raise children are 56 percent more likely to have below-poverty incomes than married adults without children.

1 Mehta (2005).

2 I use “policy elite” here in the same way as Small et al. (2010).

3 Cherlin (2009), p. 3.

Spotlighting marital poverty and hardship is in the interest of both progressives and conservatives. For progressives, spotlighting marital poverty can help make the case that economic hardship is not limited to some group easily marginalized as “other Americans,” and that families of all shapes and sizes are “in this together.”

Conservatives who want to increase marriage rates though either publicly subsidized promotion of marriage or private collective action should be just as concerned about the invisibility of marital poverty. The idealization of marriage may be fine when a married couple’s finances and prospects are “for better.” But this idealization may weaken marital bonds when a couple’s finances move in the “for worse” direction. If a married couple’s income falls precipitously after a spouse’s job is outsourced, their marriage may no longer live up to the idealized view that married people aren’t poor.<sup>4</sup> Remembering the ad slogan on the bus shelter proclaiming that “married people earn more money,” they may be more likely to view their individual marriage as a failure since it hasn’t performed as advertised.<sup>5</sup>

Why do so many married adults struggle to make ends meet in the United States? The problem is mostly due to policy decisions that have allowed wages to stagnate and decline over time. In addition, despite the increase in women’s employment over the last several decades, policymakers have yet to put in place a coordinated, comprehensive system of child care and early education—one that makes quality care and early education a birthright for all children—or adopt basic national standards for paid family leave.

If we want to reduce marital poverty and hardship—and increase family economic security generally—over the next two decades, we need to fix the economy by strengthening existing labor institutions, particularly unions, and creating new basic standards that apply nationwide, including ones for paid family leave. And, in the immediate short term, we need more public investment to create jobs and rebuild the economy. Finally, we need to strengthen existing, effective systems of social protection, including Social Security and Medicaid, and overhaul ones that have completely failed struggling married parents, particularly Temporary Assistance for Families.

## Marital Poverty Using the Federal Poverty Line

**Table 1** shows the number of non-elderly adults with incomes below the federal poverty line by marital status and presence of minor children in 2010. For a married couple with two minor children, the federal poverty line in 2010 was only \$22,113. As this table shows, among adults with incomes below the poverty line who are caring for children, marriage is typical, not an exception. Nearly half (49 percent) are currently married, including 6 percent who are married but separated.<sup>6</sup> Only about 40 percent of non-elderly adults caring for minor children have never been married.

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4 Tara Watson and Sara McLanahan (2011) have found that, for low-income men, the ratio between their income and the income of fully employed men in their local reference group is a strong predictor of marital status. For low-income men, a 10 percent higher reference group income is associated with a 2 percent reduction in marriage.

5 For a copy of this ad, see <http://www.marriageworksusa.com>.

6 Persons classified as separated in the CPS include those with legal separations, those living apart with intentions of obtaining a divorce, and other persons permanently or temporarily estranged from their spouses because of marital discord.

**TABLE 1**  
**Non-elderly Adults (18-64) Below Federal Poverty Line, by Marital Status and Presence of Related Minor Children**

	Adults Caring for Related Minor Children		Adults Not Caring for Related Minor Children	
	Number (millions)	Percent of Total	Number (millions)	Percent of Total
Married	5068	43%	2362	16%
Married, but Separated	751	6%	716	5%
Widowed	235	2%	532	4%
Divorced	1226	10%	2633	18%
Never-Married	4614	39%	8120	57%
Total	11894	100%	14364	100%

Source: Author's calculations using Current Population Survey Annual Social and Economic Supplement. Federal poverty line in 2010 was equal to \$22,113 for a family of four.

## Marital Poverty Using a Contemporary Poverty Line

The poverty threshold for the official measure was created in the early 1960s based on data from a 1955 survey of consumption expenditures. Since then, it has been updated for inflation, but not for real growth in the economy and mainstream living standards over the last half century. As a consequence, to be counted as poor today according to the official poverty line, families need to be considerably worse off compared to a typical American family than a poor family had to be compared to a typical family half a century ago.

The failure to update the poverty line over the last half century contributes to the invisibility of marital poverty. Using the obsolete official measure, many married couples are classified as non-poor today, even though they would have been classified as poor in previous decades.

**Table 2** corrects for this problem by using a contemporary poverty line, one equal to roughly the same percentage of median income as the federal poverty line when initially established.<sup>7</sup> This produces a contemporary poverty line equal to \$33,868 for a married couple with two children in 2010.

The vast majority of Americans would agree that roughly \$34,000 remains a conservative measure of the annual income needed to avoid poverty—that is, to maintain a minimally decent living standard in today's economy.<sup>8</sup> This can be shown by comparing it with responses to a 2007 Gallup survey,

7 The Appendix further explains why the current poverty line is obsolete as a measure of a minimally decent income, and how the contemporary poverty line used in this paper is constructed.

8 On the definition of poverty as not being able to afford a minimally decent standard of living, see Blank (2008) ("living in poverty suggests that a family has so little income that they are unable to purchase the things that we as a

which asked Americans to estimate “the minimum amount of yearly income a family of four would need to ‘get along in your local community.’” The average response was \$52,087 and the median one was \$45,000, still \$11,000 higher than the contemporary poverty threshold used here. The contemporary poverty line is also lower than the income cutoff for various means-tested public assistance programs, such as the National School Lunch Program, which has an income limit for reduced-price meals of \$40,792 for a family of four.

**TABLE 2**

**Non-elderly Adults (18-64) Below a Contemporary Poverty Line,  
by Marital Status and Presence of Related Minor Children, 2010**

	Adults Caring for Related Minor Children		Adults Not Caring for Related Minor Children	
	Number (millions)	Percent of Total	Number (millions)	Percent of Total
Married	9015	49%	4540	24%
Married, but Separated	1049	6%	880	5%
Widowed	329	2%	812	4%
Divorced	1752	10%	3444	18%
Never-Married	6203	34%	9218	49%
<b>Total</b>	<b>18346</b>	<b>100%</b>	<b>18895</b>	<b>100%</b>

Source: Author’s calculations using Current Population Survey Annual Social and Economic Supplement. Contemporary poverty line is equal to \$33,868 in 2010 for a family of four.

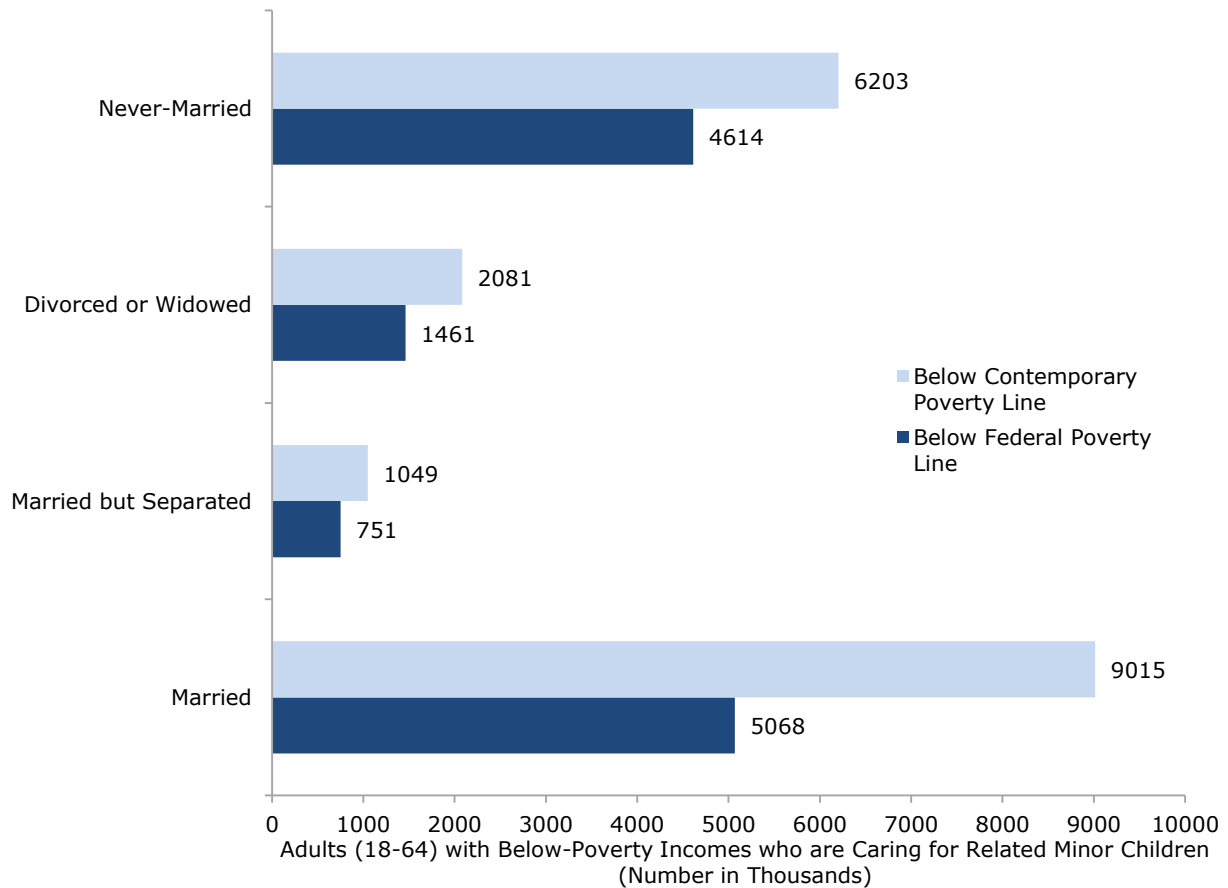
Here, again, marriage is typical among non-elderly adults with children. More than half (55 percent) are currently married, including 6 percent who are married but separated. Only about one-third of non-elderly adults caring for minor children have never been married.

**Figure 1** compares the number of non-elderly parents with below-poverty incomes in Table 1 (federal poverty line) with the number with below-poverty incomes in Table 2 (contemporary poverty line). The most striking difference is the very large increase in marital poverty when a contemporary poverty standard is used. Using the updated poverty standard, the number of married parents who are poor, increases by about 4.3 million, a 74 percent increase.

society think they need for a minimally decent life. In the United States, this typically means more than escaping starvation; it means being able to purchase the goods and services that are necessary to afford adequate and stable housing, find and hold a job, participate as a citizen in the community, keep oneself and one’s family reasonably healthy, and provide the things that one’s children need to participate effectively in school.”)

9 Jones (2007).

**FIGURE 1**  
**Number of Non-elderly Adults with Below-Poverty Income who are Caring for Children, by Marital Status and Federal vs. Contemporary Poverty Line**



Source: Author's calculations using Current Population Survey Annual Social and Economic Supplement. Contemporary poverty line is equal to \$33,868 in 2010 for a family of four.

## Contemporary Income Poverty Among Prime-Age Married Adults

To further understand marital poverty, it may be useful to look at the group Charles Murray defines as “prime-age adults”: people who are no younger than thirty and no older than forty-nine. As Murray has explained, this allows us “to focus on adults in the prime of life, with their educations usually completed, engaged in careers and raising families. People in their twenties and fifties are in decades of transition.”<sup>10</sup>

As **Table 3** shows, there were 9.5 million prime-age parents with incomes below the contemporary poverty line in 2010. Of these parents, 5.7 million, nearly six out of every ten were married. Adding in parents who are married but separated brings the marital poverty share up to two out of every three prime-age parents. By contrast, only about one in five had never been married.

<sup>10</sup> Murray (2012), p. 147.

**TABLE 3****Prime-Age Adults (30-49) Below a Contemporary Poverty Line, by Marital Status and Presence of Related Minor Children, 2010**

	Adults Caring for Related Minor Children		Adults Not Caring for Related No Children	
	Number (millions)	Percent of Total	Number (millions)	Percent of Total
Married	5741	60%	1320	23%
Married, but Separated	680	7%	406	7%
Widowed	148	2%	141	2%
Divorced	1198	13%	1,125	20%
Never-Married	1,764	19%	2736	48%
<b>Total</b>	<b>9,530</b>	<b>100%</b>	<b>5728</b>	<b>100%</b>

Source: Author's calculations using Current Population Survey Annual Social and Economic Supplement. Contemporary poverty line is equal to \$33,868 in 2010 for a family of four.

Among the smaller group of prime-age adults who are not living with related children, nearly half (48 percent) have never been married. Still, three out of ten (30 percent) are either married (23 percent) or married, but separated (7.1 percent), and just over one in five had been married (but are now divorced or widowed).

## Children and Poverty Risk

As researchers have found, “motherhood is central to contemporary gendered expectations for women” and the “cultural expectation to bear and rear children is so strong that parenthood appears normative and childlessness deviant.”<sup>11</sup> Thus, it is no surprise that most prime-age adults are raising children. Yet, despite the seemingly normative status of parenthood, prime-age adults who have children face much greater poverty risks than those who do not.

As **Table 4** shows, among married prime-age adults, those caring for children are 56 percent more likely to be living below the contemporary poverty line than those who are not caring for children. Similarly, in each of the remaining marital status categories, prime-age adults caring for children are much more likely to live below the contemporary poverty line than adults with the same marital status who do not have children.

11 See McQuillan et al (2008).



**TABLE 4**  
**Prime-Age Adults (30-49) Caring for Children Have Higher Poverty Rates**

	Number of Prime-Age Adults Below Contemporary Poverty Line who are Caring for Children (thousands)	Contemporary Poverty Rate of Adults		Percentage Increase in Poverty Risk for Adults Caring for Children Compared to Adults with Same Marital Status who are Not Caring for Children
		Not Caring for Related Minor Children	Caring for Related Minor Children	
All Prime-Age Adults	9531	16.5%	20.1%	21%
<i>By Marital Status</i>				
Married	5741	9.7%	15.1%	56%
Married But Separated	680	29.2%	53%	82%
Widowed	148	33.1%	42.5%	28%
Divorced	1198	19.5%	32.2%	65%
Never Married	1764	20.3%	43.2%	112%

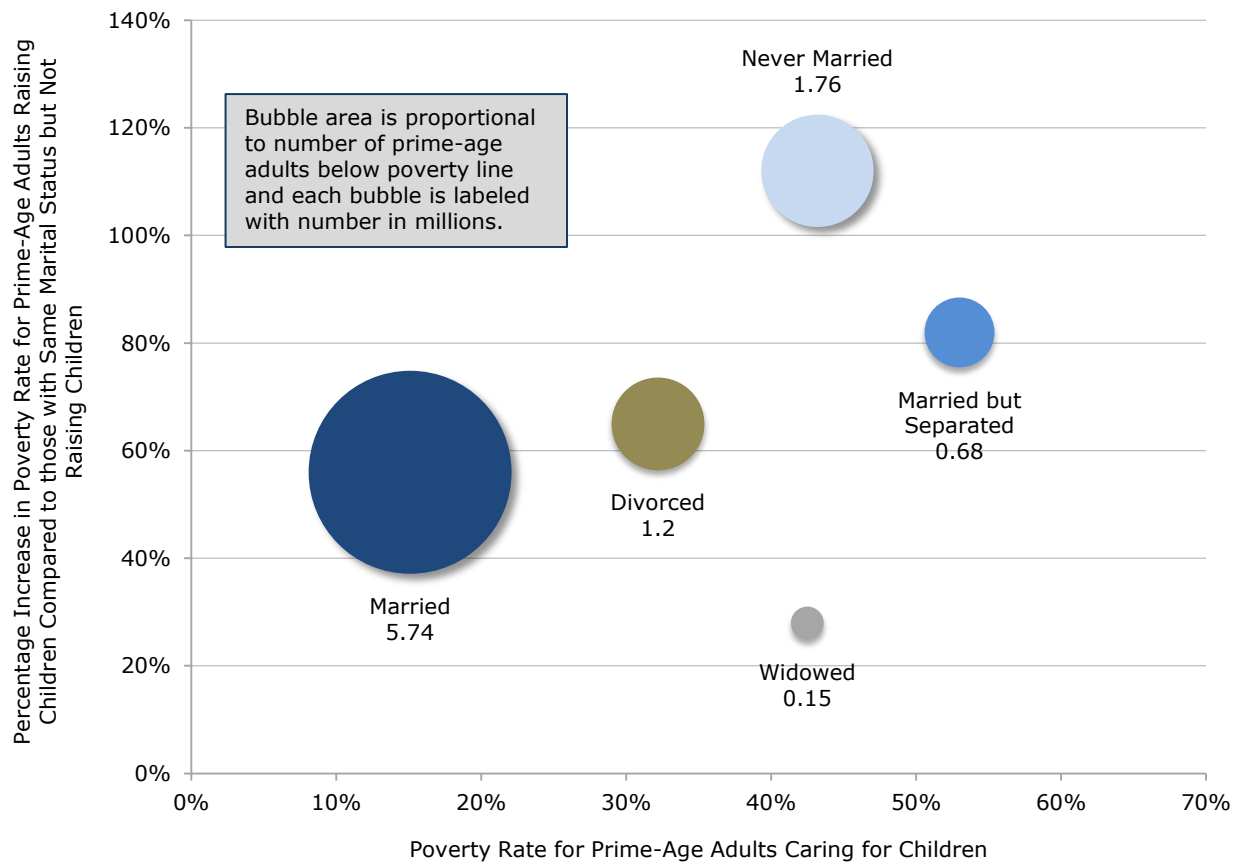
Source: Author's calculations using Current Population Survey Annual Social and Economic Supplement. Contemporary poverty line is equal to \$33,868 in 2010 for a family of four.

Not surprisingly, divorced parents (who have not remarried) have higher poverty rates than currently married parents. However, there is not much difference in the impact that caring for a child has on their respective risks of living in poverty (56 percent increase in poverty risk for married parents compared to a 65 percent increase for divorced ones). And divorced parents caring for children have lower poverty rates and less poverty risk associated with children than married but separated parents and never married ones.

About 41 percent of married prime-age parents living below the poverty line are Latinos, a group disproportionately employed in poorly compensated jobs. Divorced parents are mostly non-Latino and white. For them, the strengthening of child support norms and enforcement, as well as gains in pay equity and women's employment over time, have probably helped lower their poverty risk associated with raising children.

**Figure 2** below is a bubble chart that displays, by marital status, the number of prime-age adults with below-poverty incomes who are caring for children (the first data column in table 4), the poverty rate for prime-age adults caring for children (the third data column), and the increase in poverty risk associated with caring for children (the fourth data column).

**FIGURE 2**  
**Prime-Age Parents with Below-Poverty Incomes—Number, Poverty Rate, and Poverty Risk Associated with Having Children by Marital Status, 2010**



Source: Author's calculations using Current Population Survey Annual Social and Economic Supplement. Contemporary poverty line is equal to \$33,868 in 2010 for a family of four.

## Limitations and Directions for Future Research

There are at least three limitations with the approach used here to quantify marital poverty and hardship.

First, it does not address the considerable bias introduced by treating unmarried couples who are living together and sharing expenses as two separate family units. Currently, the federal poverty measure only accounts for *marital* status and not for *partnership* status, even among unmarried couples who have children in common. Ideally, unmarried couples who share expenses would have their own status in this analysis.<sup>12</sup> If they did, the numbers of divorced, separated, widowed, and never married adults with incomes below the poverty line would decline, and the number of coupled

<sup>12</sup> Research finds that cohabiting-parent households do generally pool resources, although at a slightly lower rate than married ones. See Kenney (2004) and Provencher (2011). Cohabitation is now the modal path to marriage—in the 2000s, 67 percent of women cohabitated before their first marriage. And recent couples who cohabit before marriage are *no* more likely to experience marital instability than those who do not. Manning and Cohen (2012).

adults in poverty would increase. Currently, about 2.8 million parents in unmarried couples with incomes under \$40,000 have one or more joint children, so even just taking this group into account would make a significant difference.<sup>13</sup>

Second, I use the same income definition (pre-tax, money income) as the federal poverty measure. This has the effect of excluding some resources, such as the Earned Income Tax Credit, that should arguably be counted as income, while not subtracting some expenses, such as payroll taxes, that should arguably be excluded.

Third, the analysis is limited to income poverty. It would also be helpful to look at various direct measures of economic hardship, including food insecurity. Looking simply at USDA's published tables on food insecurity, it appears that among households that include minor children, about 7.1 million adults in married couples lived in food-insecure households compared 4.3 million unmarried male or female households heads.<sup>14</sup>

I hope to address these limitations in future analyses, but for the time being let them stand in the interests of simplicity and making a straightforward and conservative comparison with the official poverty statistics.

In future research, it would also be useful to track marital poverty trends over time. In doing so, it would make sense to use both the contemporary poverty measure used here and a measure that is anchored at median income in a base year and then only adjusted for price changes for a period of time (to avoid obsolescence, no more than 10 to 20 years at most). This two-measure approach would be similar to that used by the Pew Foundation's Economic Mobility Project to measure changes in economic mobility over time.

Finally, it would also be interesting to examine geographic variation in marital poverty. In *Red Families v. Blue Families: Legal Polarization and the Creation of Culture*, Naomi Cahn and June Carbone, "use geography as an organizing theme in an effort to capture the relationship between different family patterns and different political and ideological packages."<sup>15</sup> They find that the demographic story is "overwhelmingly about the age at family formation." According to Cahn and Carbone:

The reddest areas of the country, both in terms of their politics and the lives of their families, marry and have children at younger ages and are most likely to see the embrace of traditional values as critical to community well-being. The "bluest" areas of the country, and particularly the urban Northeast, have the highest average ages of family formation and demonstrate the greatest support for mechanisms that effectively deter teen birth.

A quick comparison of marital poverty statistics for a prototypical red state (Texas) and a prototypical blue one (Massachusetts) suggests that geographic differences in culture and economics play a similar role here. Texas has a relatively high poverty rate (17.9 percent in 2010), while

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13 Author's calculation from America's Families and Living Arrangements, Tables FG1 and FG5, accessed on October 30, 2012 at <http://www.census.gov/hhes/families/data/cps2011.html>.

14 Author's calculations from Table 2, Household Food Security in the United States, ERR-141, Economic Research Service/USDA. The source for Table 2 was the December 2011 Current Population Survey Food Security Supplement. A household is considered food insecure if, at least some time during the year, the food intake of one or more household members is reduced and their eating patterns disrupted due to a lack of resources to obtain food.

15 Cahn and Carbone (2010).

Massachusetts has a relative low rate (11.4 percent). Parents with below-poverty incomes in Texas are significantly more likely to be married in Texas than in Massachusetts, and married parents caring for minor children have much higher poverty rates in Texas than in Massachusetts.<sup>16</sup>

## Conclusion

Most parents with below-poverty incomes who are raising minor children are married. The failure of many policy elites to recognize the extent of marital poverty covers up the profound economic struggles of millions of married parents. To reduce marital poverty and hardship—and increase economic security for families of all types—policy makers need to expand and strengthen labor market institutions as well as universal systems of social protection against economic risks, and make quality child care and early education a birthright for all children.

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16 Similarly, in a recently published paper, Kearney and Levine (2012) find that state-level income inequality, measured using the 50-10 income ratio, explains a sizable share of the geographic variation in teen birth rates. The high inequality/high teen birth states are mostly red states (including Texas with the second highest teen birth rate in the United States, while the low-inequality/low-teen-birth states are mostly blue ones (including Massachusetts with the third lowest teen birth rate).

## Appendix

### Methodology for Contemporary Poverty Threshold

The contemporary poverty threshold used in this paper is set at nearly the same level of median family income in 2010 as the official one was in 1959. I use conservative and transparent assumptions to construct the contemporary thresholds. Specifically, I anchor the threshold to a percentage of median rather than average income. While the base-1959 poverty threshold in 1959 was equivalent to 53.2 percent of median income, I round down, setting the contemporary threshold at 50 percent of median family income (as a result, the 2010 contemporary threshold is about \$1,200 lower for an individual than it would be if I had used the exact 1959 equivalent).

To adjust for family size, I use a standard equivalence scale that divides household income by the square root of family size. So, for example, a family of four is assumed to need an income that is only twice as large as one composed of a single person. For certain family types, including single-parent families and families with children or people with disabilities there are strong arguments for using equivalence factors that assume lesser economies of scale than this approach. But in this initial paper, I want to establish a conservative baseline using simple and transparent methods.

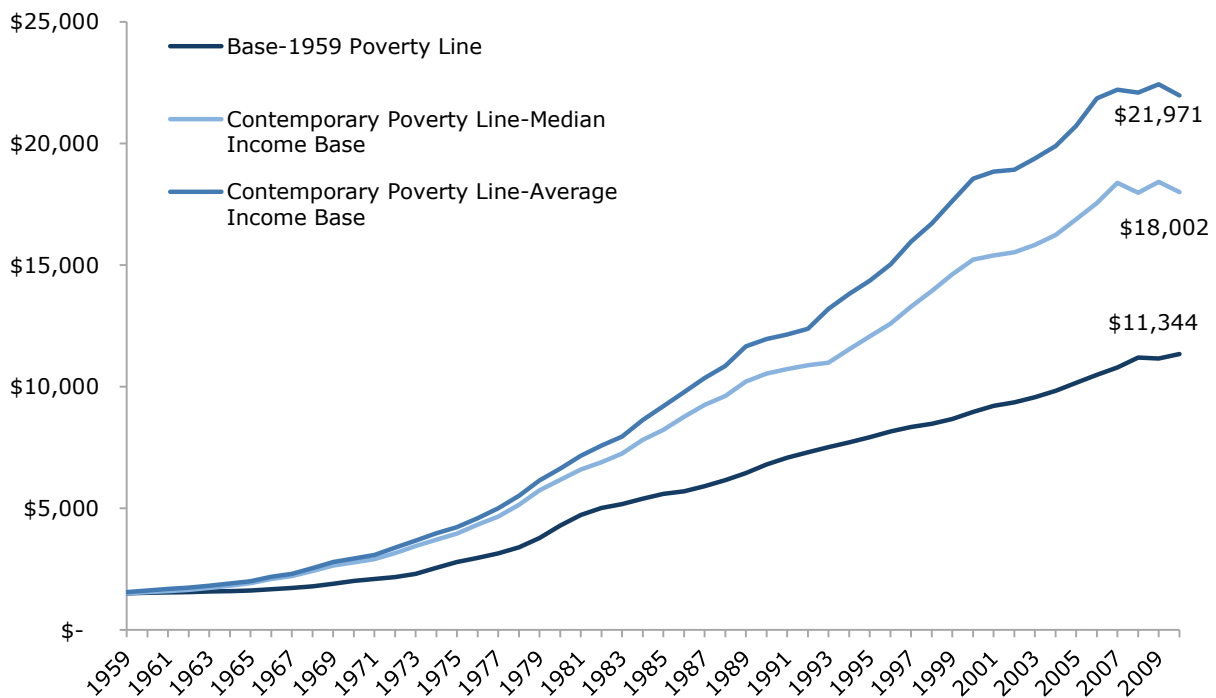
Both the official poverty statistics and the contemporary poverty statistics in this paper were calculated using the Census Bureau's CPS Table Creator at <http://www.census.gov/cps/data/cpstablecreator.html>.

### Background on How the Federal Poverty Line has Defined Economic Deprivation Down

The poverty threshold for the official poverty measure was created in the early 1960s based on data from a 1955 survey of consumption expenditures. Official poverty data using this threshold starts in 1959 with a poverty threshold that is equal to about half of family income (53.2 percent of median and 48.2 percent of average, both equivalised for family size). Today, even with declines in median family incomes in recent years, it has fallen to one-third (33.5 percent) of median family income. Moreover, as a result of increasing inequality, driven mostly by outside increases in incomes for the elite, it has fallen to only one-fourth (25.8 percent) of average family income.

In essence, the federal government's half-century-long failure to update the official poverty measure has defined economic deprivation down. To be counted as poor today, a family needs to be considerably worse off compared to a typical American family than a family half a century ago. Figure A1 charts how the official poverty measure has defined economic deprivation down since 1959. It compares the official poverty measure with two contemporary poverty measures that define economic deprivation consistently over time. The first has been adjusted to maintain the same level as a percentage of median family income as it had when it was set in the early 1960s. The second has been adjusted to maintain the same level as a percentage of average family income. To avoid confusion in this appendix, I will refer to the official poverty measure as a "base-1959" poverty measure and to measures that maintain the same level of deprivation over time as "contemporary" poverty measures, anchored to the same percentage of either median or mean income.

**FIGURE A1**  
**The Base-1959 “Official” Poverty Measure Defines Deprivation Down Compared to Contemporary Measures—Poverty Lines for One Person**



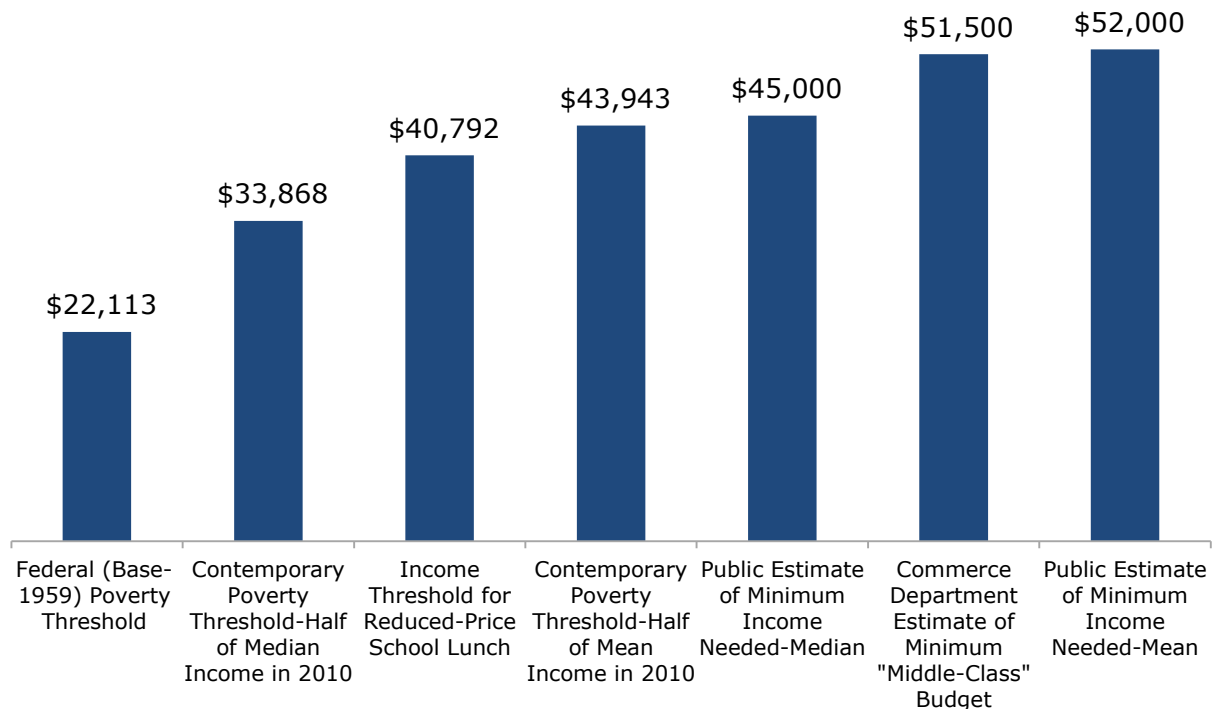
Source: Author’s calculations using Current Population Survey.

As **figure A1** shows, the contemporary poverty threshold (tracking half of median incomes over time) for one person in 2010 was equal to about \$18,000, an amount equal to approximately 150 percent of the base-1959 poverty threshold. The vast majority of Americans would agree that this is a very conservative measure of the annual income needed to maintain a minimally decent living standard in today’s economy.

**Figure A2** below compares the base-1959 measure with contemporary measures for a family of four and responses to a Gallup survey, which asked Americans to estimate “the minimum amount of yearly income a family of four would need to ‘get along in your local community.’”<sup>17</sup> The average response was \$52,087 and the median one was \$45,000, still \$11,000 higher than the contemporary poverty threshold (median anchored) for a family of two adults and two children in 2010 of \$33,868.

17 Jones (2007).

**FIGURE A2**  
**Minimum Income Standards for a Family of Four in 2010**



Sources: Author's calculations using Current Population Survey; Gallup (2007); Commerce Department, and USDA. Gallup figures are for 2007.

The rationale for this sort of contemporary threshold of minimum income adequacy, instead of the current base-1959-measure, is straightforward and should be uncontroversial.<sup>18</sup> In *The Wealth of Nations*, Adam Smith defined poverty in terms of what “the custom of the country” required people, “even of the lowest order,” to have for a minimally decent standard of living. As Figure A2 shows, a contemporary poverty standard better reflects public opinion on what “the custom of the country” requires than does the federal poverty threshold.

Similarly, echoing Smith, Ron Haskins and Isabel Sawhill explain that:<sup>19</sup>

... relative poverty [a contemporary measure] is a better measure of individual well-being than absolute poverty [a measure set to living standards in some base year, and adjusted only for inflation since then], because social context and community norms

18 Of course, poverty measurement is a highly politicized area in the United States. This is likely due in large part to the use of the label “poverty” and the outdated idea that poverty can be best measured with a single income-based measure. For thoughts on an alternative approach, see Fremstad (2010a).

19 Haskins and Sawhill (2009), p. 37. Although the terms relative and absolute are commonly used in academic literature, I avoid them here because they are imprecise and misleading descriptors. The current federal poverty measure is commonly described as an “absolute” poverty measure, even though it was initially set in an explicitly “relative” fashion (specifically relative to consumption expenditures in 1955). As a practical matter, it’s hard to imagine a meaningful income poverty measure in a wealthy nation that isn’t “relative” to something. And the popular and political connotations of the terms absolute and relative have little in common with their meaning in technical, academic literature.

about what it means to be poor change over time, implying that the poverty line should be adjusted as economic growth makes everyone better off. ...

On the fringes, some libertarian economists have argued that the base-1959 poverty measure is much too high because the Consumer Price Index (which is used to adjust the measure) doesn't take into account technological and other innovations, such as dishwashers, air conditioning, and computers.<sup>20</sup> Their argument is an interesting ivory tower one, mainly because, if applied consistently to both the rich and poor, it would mean that today's rich haven't just got a lot richer, but *fantabulously richer* as a class in a way that goes beyond the wildest imagination of most rich people fifty years ago. This would further strengthen the case for returning to the historically high 1950s-era marginal tax rates on the current rich. But this approach also produces a poverty threshold of around \$10,000 for a married couple with children, an amount that is completely lacking in any real-world plausibility, and the proponents of this theory make no attempt to provide one.<sup>21</sup>

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20 For more on this approach and a more detailed critique of it, see Fremstad (2010b).

21 Ibid.



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