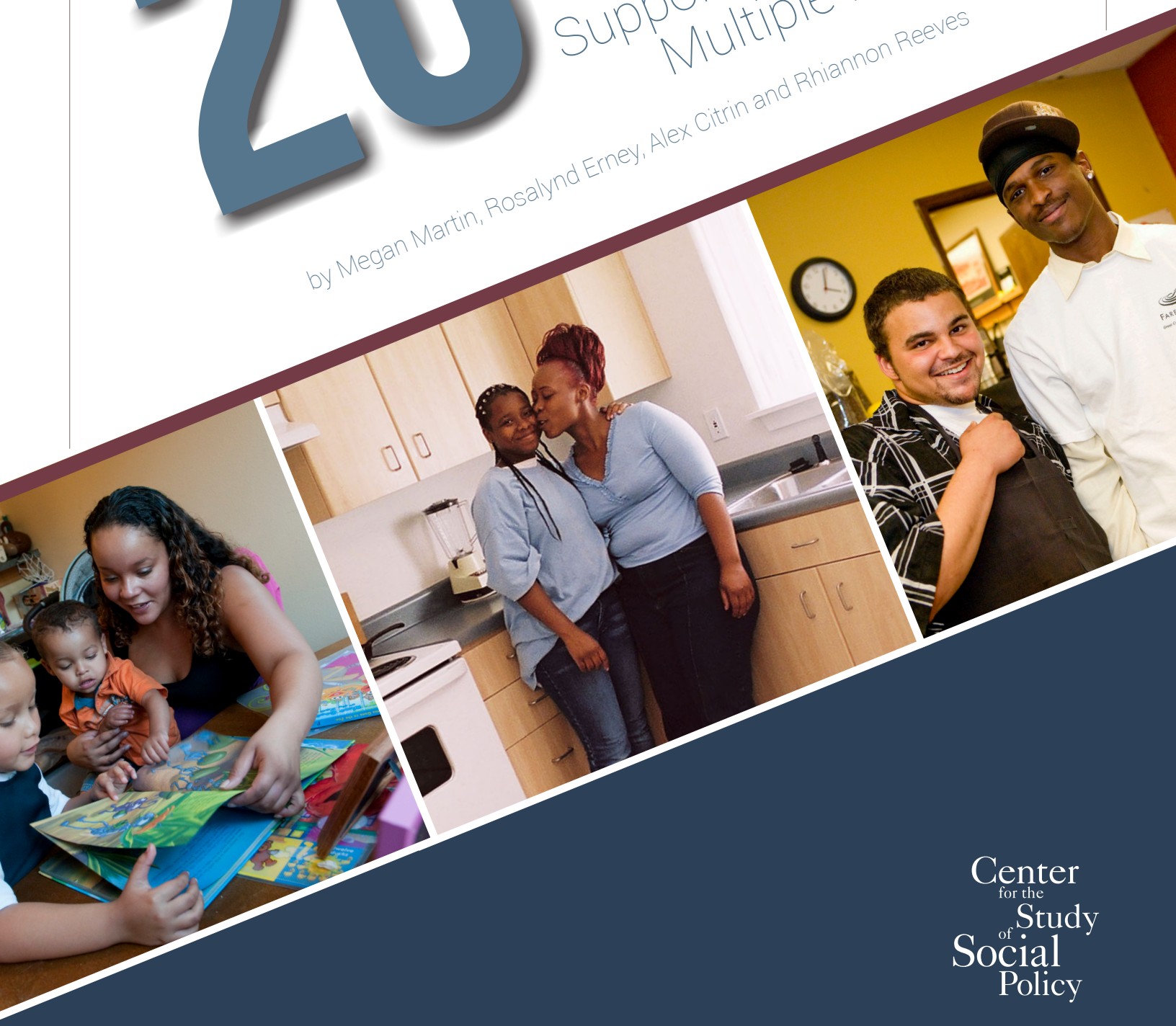
20 YEARS OF TANF

Opportunities to Better Support Families Facing Multiple Barriers

by Megan Martin, Rosalynd Erney, Alex Citrin and Rhiannon Reeves



Center for the Study of Social Policy

20 Years of TANF: Opportunities to Better Support Families Facing Multiple Barriers

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Center for the Study of Social Policy

1575 Eye Street, Suite 500
Washington, DC 20005
202.371.1565 telephone

50 Broadway, Suite 1504
New York, NY 10004
212.979.2369 telephone

1000 North Alameda
Street, Suite 102
Los Angeles, CA 90012
213.617.0585 telephone

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INTRODUCTION

August 22, 2016 is welfare reform's 20th anniversary, which provides an important opportunity to look back at the passage of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) and the sweeping policy and program changes that it created. More importantly, it is time to consider the impact these changes are having on families today. This compendium of policy briefs takes a closer look at welfare reform's anchor program—Temporary Assistance for Needy Families (TANF)—and recommends ways that states can optimize the program to serve the families facing the greatest barriers to success and shape the program to advance equity. Specifically, we look closely at TANF's challenges and opportunities for serving families living in ***deep poverty****, families involved with* ***child welfare*** *systems and families with* ***young children****, all of whom are the very families often experiencing exceptional barriers to economic stability. This series provides recommendations that states can adopt today, taking advantage of the flexibility provided through TANF and that can also be used to inform additional federal welfare reform efforts.*

TANF significantly changed the way that the safety net serves poor and low-income families, and it established a host of rules to ensure that program participants are actively engaged in the workforce. TANF includes program participation timelines, work requirements, eligibility shifts, sanctions and other adjusted program rules that have had significant consequences for families. Many families facing barriers to success are unable to successfully meet the requirements of TANF without additional supports.

Throughout this series, we emphasize racial disparities and the historical disadvantages that families of color continue to face, creating the need to craft programs and policies that are responsive to their needs. Families of color too often compete in a discriminatory labor market and live in communities that are disconnected from educational and professional opportunities. For them, establishing family economic stability requires more than promoting personal responsibility. Policy needs to actively offset these disadvantages to ensure families have the best chance of being successful and the greatest likelihood of ending intergenerational poverty.

States have begun to institute strategies that address some of the additional TANF supports and services required to meet the needs of families living in communities of concentrated poverty and that can be applied at the program level to begin to address the significant barriers placed on racial and ethnic minorities in the labor market. These strategies include those that reduce the undue burden for families involved in multiple serving systems, that support real alignment between work and training programs and parent needs for child care and that begin to target the needs of families in living in deep poverty. There is no programmatic fix that will address the broader issues of racism that influence employment and economic success for families of color; however, the recommended changes outlined here have the potential to mitigate some of their effects.

There has been a dramatic reduction in the last 20 years in the number of people who receive welfare benefits, and while there is no doubt that TANF incentivized and supported some people who went to work and continue to do so, there has not been a reduction in poverty. The success of TANF, as a whole, is difficult to determine due to the discretion provided to states and the resulting diversity in programming and implementation. However, if the ultimate goal is to provide families with supplemental income and support while they become economically stable—thereby reducing poverty—the program has not had the desired effect. Additionally, research suggests that the families who need these supports the most are often not benefiting from them.

KEY FEATURES AND HISTORICAL CONTEXT OF TANF

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996, enacted as part of a federal effort to "end welfare as we know it" created the TANF block grant.[1] The TANF block grant replaced the Aid to Families with Dependent Children (AFDC) program, which had provided cash welfare to poor families with children since 1935. AFDC, an open-ended entitlement, allowed states to provide cash assistance with federal matching reimbursement to eligible families for as long as they qualified. TANF, on the other hand, is a block grant, limiting the amount of dollars the federal government provides states annually but provides states with increased discretion over the welfare programs' eligibility rules, benefit amounts and general program parameters.

Under the TANF structure, the federal government provides a block grant to the states, which use these funds to operate their own welfare programs. States can use TANF dollars to meet any of the four purposes set out in federal law: (1) provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives; (2) end the dependence of needy parents on government benefits by promoting job preparation, work and marriage; (3) prevent and reduce the incidence of out-of-wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies; and (4) encourage the formation and maintenance of two-parent families.

States have broad discretion to determine who is eligible for various TANF-funded benefits and services. In general, states must use the funds to serve families with children, with the only exceptions related to efforts to reduce non-marital childbearing and promote marriage. A state can set different eligibility limits for different programs funded by the TANF block grant. For example, a state could choose to offer TANF cash assistance only to very poor families, but provide TANF-funded child care or transportation assistance to working families with somewhat higher incomes.

Two other key elements of the TANF program are work requirements and time limits, both of which apply to "assistance" (income support and other aid designed to meet basic ongoing needs). Federal law requires that half of the families receiving assistance under TANF must be engaged in some kind of work-related activity for at least 30 hours per week (or 20 hours per week for single parents with young children). States must have a higher share of two-parent families—90 percent—engaged in work, generally for 35 hours per week. States can get credit against this work rate for

recent declines in their assistance caseload. Changes made in the work requirements by the Deficit Reduction Act of 2005 and subsequent federal regulations effectively increased the work requirements that states must meet.[2]

TANF time limits established the general rule that no family that includes an adult recipient may receive federally funded assistance for longer than 60 months (whether or not consecutive). States are allowed to use federal TANF dollars to extend time limits beyond 60 months, but only for up to 20 percent of the caseload. States generally provide exceptions and exemptions for some groups of families meeting specified criteria. Federal law does not impose a time limit on families receiving assistance funded entirely with state funds, but most states have chosen to impose time limits on the bulk of enrolled families.

Although most states have set time limits of five years on TANF and state-funded assistance, about one-third of states impose time limits that are shorter than five years. Hundreds of thousands of families have been cut off of TANF due to reaching time limits, but many more families have had their benefits terminated due to other policies and procedures, such as sanctions for failing to meet a program requirement or procedural hurdles that make it difficult for families to apply for assistance.

STRUCTURING TANF PROGRAMS TO MEET THE COMPLEX NEEDS OF FAMILIES IN DEEP POVERTY

Families Facing Multiple Barriers

TANF was designed to serve as a safety net for poor families, but it often does not address the needs of those families facing the greatest barriers to economic self-sufficiency. TANF enrollees must juggle meeting program requirements and basic family responsibilities including housing, food, child care and health care. Families living in *deep poverty* and often involved in multiple public systems, including child welfare, can have conflicting and additional program requirements that work against program goals. Such cases highlight the need for targeted policy solutions that address families' needs in an intentional, holistic manner.

TANF's flexibility allows states to set their own rules about extensions and exemptions, administering sanctions and developing alternative state programs and funding streams. Many states' decisions do not account for factors associated with race, immigration or citizenship status, language barriers, poverty and health related issues. The data on families living in poverty and deep poverty provide important insights into barriers faced by many families for whom TANF could and should help.

Poverty : An annual income of **$19,073** or less for a family of three

According to the U.S. Census Bureau, 9.5 million families with children were living in poverty and the poverty rate for children under 18 was 21.1 percent in FY2014.[i]

30.6%

In 2014, female householders faced a poverty rate of 30.6 percent, compared to 15.7 percent of male householders and 6.2 percent of married couples.[ii]

2x Poverty Level

Research suggests that, on average, families need an income equal to about two times the federal poverty threshold to meet their most basic needs.[iii]

Sixty-nine percent of poor children in 2014, or 10.4 million children, lived in families with at least one working parent or guardian.[iv]

While children living in single-parent families are much more likely to be poor, millions of poor children live in two-parent families.[v]

Among children whose parents have less than a high school degree, 85 percent live in low-income (defined as at or above 200 percent of the federal poverty line) and 55 percent in poor families (between 100 and 199 percent of the federal poverty line).[vi]

Understanding the extraordinary barriers that contribute to persistent poverty for some families is important when crafting new anti-poverty solutions or strengthening existing ones. These barriers are wide-ranging, often interconnected and include homelessness, immigration status, language barriers, chronic illness, addiction and physical and intellectual disabilities. For families of color living in deep poverty, these barriers, exacerbated by historic disinvestment in communities and lack of connection to the workforce, perpetuate systemic, intergenerational poverty.

When policies and programs designed to alleviate poverty do not recognize the intersecting challenges associated with discrimination based on race, ethnicity, class, gender, immigration status and ability or fail to take into account the compounding impacts of housing instability and traumatic family history, they often fail to address the basic needs of the neediest families. The set of policies and programs that currently make up our nation's safety net provide essential supports for the very poor and serve as a crucial tool for promoting equity for all children and families. However, the realities faced by families living in deep poverty highlight the need for targeted policies that make safety net services and supports available and accessible to families facing the greatest barriers.

Addressing Barriers through Targeted Policy

PRWORA gave states flexibility over TANF programming and funding, including determining initial eligibility thresholds, benefit payment amounts, time-limit extensions and exemptions and fund allocations. This discretion has resulted in great variation in how programs are funded and administered throughout the country, and it suggests opportunities for states to implement targeted policy in ways that better serve families in deep poverty. These opportunities fall into three main categories:

1. Using sanctions as triggers to connect recipients to wrap-around services
2. Improving employment prospects for recipients with significant challenges to work
3. Targeting policy toward families approaching time limits before their benefits erode

Using Sanctions as Triggers to Connect Recipients to Wrap-Around Services

Federal law requires states to reduce TANF-funded cash assistance to families for noncompliance (general failure to comply without good cause) with the state's work requirements, but it gives states discretion in determining the amount and duration of the penalty, known as a sanction. Federal rules also require states to administer sanctions for violations of child support cooperation, and most states impose additional requirements for sanctions, including those related to a child's school attendance or grades. States typically have imposed "full-family" sanctions, meaning that they withhold all of the aid an entire family would otherwise receive, but five states and the District of Columbia only partially

Barriers to Work

Research has shown that families living in deep poverty often face multiple compounding barriers to connecting to the workforce. Families living in deep poverty are more likely to have lower levels of education, less work history, work-limiting health conditions, poor mental or emotional health and are more likely to be caring for very young children* or children with special needs. In addition, TANF work requirements often force workers to maintain employment in low-wage jobs with unpredictable work to maintain their benefits and support their families, rather than receiving training or education to obtain higher-paying jobs that could lift them out of poverty.

* Reeves, R. (2016). *An Equitable, Multigenerational Approach to Finalizing FY 2016-2018 CCDF State Plans.* Washington, DC: Center for the Study of Social Policy. Available at http://www.cssp.org/policy/2016/CCDF-state-plans-brief-feb-2016.pdf

Upon initial sanction:

- **25 states** reduce or remove benefits for 1-3 months
- **13 states** reduce or remove a family's benefits until they reach compliance
- **6 states** impose a wait period before reinstating a family's benefits after compliance
- **2 states** (North Carolina and Utah) require a family to reapply
- **2 states** (Massachusetts, South Dakota) issue no punishment for initial sanctions
- Only **one state** (Florida) issues sanctions for less than one month (10 days)
- **One state** (Alaska) issues sanctions for 4 months
- **One state** (New Hampshire) issues sanctions for one payment period

Urban Institute. (n.d.). *Welfare Rules Database table III.B.3: Sanction policies for noncompliance with work requirements for single-parent head of unit, July 2014.* Retrieved from http://wrd.urban.org/wrd/tables.cfm

reduce cash assistance benefits for noncompliance with state work participation requirements.[3] A majority of states impose minimum sanction periods ranging from one to three months for a first work requirement violation; most states impose longer minimums ranging from three to 12 months for any subsequent violations. Longer sanction periods and larger benefit reductions actually make it more difficult for a family to bring itself back into compliance and can create undue burdens for families.

The discretion provided to states through federal TANF rules to determine when and how to use sanctions is particularly important because studies have shown that many sanctions are made in error or imposed for minor violations, are disproportionately leveraged against families of color and families facing multiple barriers—such as homelessness, chronic illness, addiction, language barriers or physical and intellectual disabilities—and often result in these families leaving TANF and becoming further disconnected from the safety net.[4] Studies in multiple cities have shown that as few as 5 percent of work requirement sanctions were administered for not attending a job interview or quitting a job, while many more were for missing a single appointment or not filing a document.[5] Furthermore, an analysis of appealed sanction decisions in three states found that sanctions were reversed in 42 to 77 percent of cases.[6] Research has shown that sanctioned families are less likely to have completed high school, have more children to care for and have less access to transportation than other TANF recipient parents. In addition, sanctioned parents are disproportionately more likely to be African American.[7] About one-third of the least stable TANF leavers—meaning those without employment who lack alternative sources of financial support—left the social safety net because of a sanction.[8] Thus, for many families already facing significant barriers, the application of TANF sanctions means that TANF provides neither a reliable safety net nor workforce assistance that addresses their specific barriers to employment.

To prevent longer-term negative consequences when families are sanctioned, states could instead use initial sanctions as a trigger to connect a family with wrap-around services. Some jurisdictions have already employed this strategy to better serve families facing the greatest barriers. **Los Angeles County** in California, for example, performed a study of its Greater Avenues for Independence (GAIN) program and found that almost two-thirds of sanctioned participants were sanctioned before participating in any programming, primarily for failing to attend scheduled orientation. Additionally, the most common identified reasons for failing to meet work requirements included lack of adequate transportation, child care[a] and failure to receive program notifications. The same study found that families who had received multiple or long-term sanctions often faced personal or program-level barriers that took priority over complying with work requirements.[9] In response to these findings, the LA County Department of Social Services implemented a GAIN Sanction Home Visit Outreach (GSHVO) project. After receiving an initial sanction, a GSHVO social worker conducts a home visit with the family, where he or she conducts various screenings and evaluations to identify individual barriers—including transportation, child care assistance, learning disabilities, mental health, substance abuse and domestic violence issues—and refers the family to external professional services if needed. In the project's first year of implementation, 72.8 percent of its cases resulted in a successful resolution with agreements to participate, sanction exemptions granted, good cause determinations or other outcomes that prevented or resolved a sanction.[10]

a. For a more detailed analysis of the challenges of complying with TANF work requirements while caring for young children, please see section on TANF and federal child care subsidies.

Nebraska's Building Nebraska Families (BNF) program provided individualized education, mentoring and service coordination support to families who had an active TANF case, received a first or second sanction or were at the end of a third sanction period. Families enrolled in the program must have attempted or been considered for less intensive programs and faced multiple barriers including intergenerational poverty and limited education. Once accepted into the program, families met weekly in their home with a masters-level caseworker and received intensive pre-employment and life skills training for an average of 11 to 12 months. Clients had the option to continue their participation in the program for up to six month after leaving TANF. In a rigorous evaluation, this program was found to have been extremely successful in increasing employment and earnings, improving quality of life and reducing poverty for the very hard-to-employ.[11] Unfortunately, because the program did not target resources toward those facing the greatest barriers and was open to all active TANF cases, including those who were healthy, had graduated high school and had been receiving TANF for less than a year, the program became too costly and was shuttered in 2008. However, a similar program or approach that targets families facing multiple, complex barriers who have received an initial sanction has the potential to effectively connect those with the greatest need to the workforce and maintain the supports they need while managing costs efficiently.

Improving Employment Prospects for Recipients with Significant Challenges to Work

In addition to ensuring that families facing significant work barriers are not disconnected from the safety net through onerous sanctions, many states have crafted innovative workforce policies

to address work barriers and promote equity for all children and families. Several states have designed successful programs using federal TANF funding to

(1) create assessment tools that include disability screenings, clinical and psychological assessments, functional needs assessments; and vocational assessments

(2) provide targeted connection to work opportunities

(3) provide support services apart from work supports, such as intensive case management, rehabilitative services, job coaching, mental health counseling, substance abuse treatment, vocational rehabilitation and domestic violence services.[12]

Some states use TANF funds to create work opportunities that provide a first step to permanent unsubsidized employment for those facing significant barriers. The Department of Workforce Services in **Utah's Davis County** contracted with a county mental health treatment provider to offer unsubsidized transitional employment for up to 20 TANF participants with diagnosed mental health disabilities through the **Diversified Employment Opportunities (DEO)** program. Recipients' wages are paid solely by the contractor, while supportive services are paid directly with TANF funds. Specific components of the DEO program include: (1) unsubsidized transitional paid job opportunities for clients, (2) resources for identifying and addressing clients' mental health needs, (3) work supports such as child care and (4) ongoing collaboration and service coordination by a team of social work staff and mental health professionals. TANF participants are able to remain in the program as long as needed.[13] The program supports individualized and supportive employment opportunities for TANF participants living with a diagnosed mental health concerns—such as major depression, generalized anxiety, bipolar disorder and post-traumatic stress disorder—in food service, landscaping, painting, janitorial and clerical positions. Typically, clients work a smaller number of hours as they begin the program and gradually increase their work hour over time. This provides employees with the support and structure to gain new work skills while simultaneously balancing their mental health needs. As the participants are able to increase their ability to work more hours, the program responds by increasing their work hours in an individualized manner.

Other states leverage state TANF funds to better serve families facing significant barriers to work. Fourteen states have adopted solely state-funded TANF programs to serve parents with significant barriers to employment and to provide services not "countable" under federal TANF requirements. In nine of these states, families are not required to comply with federal TANF program requirements.[14] Other states, like California, allow participation in certain activities like substance abuse or mental health treatment to count toward TANF work activity requirements.[b]

b. For a more detailed analysis of innovative approaches to TANF work activity requirements that better meet families' needs, please see section on families experiencing child welfare involvement and their access to TANF.

Targeting Policy toward Families Approaching Time Limits before Their Benefits Erode

Under federal rules, states can set their own time limit policies for TANF recipients but cannot provide cash assistance from federal TANF funds for longer than 60 months to a family that includes an adult recipient. However, states can exceed the 60-month limit for up to 20 percent of their caseload based on hardship and are not required under federal law to impose a time limit on "child-only families" (those with no adult receiving benefits) or on families receiving assistance funded with state funds. Research has shown that families who reach these time limits are among the most vulnerable. They are far more likely to face barriers to employment from physical and mental health challenges, have lower levels of education, are more likely to be limited in English proficiency, have limited community mobility and limited social networks and are more likely to live in subsidized housing than other TANF participants.[15] Moreover, they are more likely to report that they are worse off financially after exiting TANF; and several state surveys have found that families whose cases were closed as a result of reaching time limits experience material hardship and rely heavily on other forms of public assistance, such as food stamps or SNAP.[16]

Implementing policies to support extensions of time limits or safeguarding the continuation of benefits to children in families approaching time limits are particularly important to ensure that families facing the most significant barriers are not completely disconnected from critical supports. Two states (**Massachusetts** and **New York**[c]) have no time limit, 31 states[d] adhere to the federal time limit and 17 states have time limits shorter than five years.[17] **Oregon** and **California** recognize the impact of growing up in poverty on child outcomes and have taken steps to support children in these families and provide exemptions or continue to provide benefits, though small, to only the children

c. New York continues TANF benefits through a separate state-funded program if the family remains in compliance.

d. Including Oregon where the 60-month time limit applies only to adult participants

in a family after they have reached the federal five-year limit. Importantly—and beneficial to both states and families—several states and localities have used targeted strategies to address families with the greatest need approaching time limits.[18] Three states (**Florida**, **New Mexico** and **Oklahoma**) grant extensions to Supplemental Security Income (SSI) program participants, and **Maine** and **Delaware** exempt SSI program participants from their time limits.[19]

To better understand the needs and barriers facing families nearing the time limit**, Ramsey County, Minnesota,** used financial surpluses resulting from its caseload reduction in the immediate years following the passage of PRWORA to craft solutions to improve positive outcomes for families facing significant barriers to the workforce. The county used vocational psychological testing, in-home functional needs assessments and intensive case management services to understand the personal and family challenges that many long-term TANF recipients face that severely limit their employment prospects. By taking a proactive approach to identifying the families facing the greatest employment barriers, Ramsey County granted time-limit extensions at almost twice the rate of a neighboring county, despite having similar demographics and TANF caseloads. Although some adults were able to find employment and leave TANF with the help of the county, other families had significant long-term needs and were unable to successfully participate in the workforce to a degree that would allow them to meet the basic needs of their families without additional supports, such as SSI.[20]

Deep Poverty

Living at or below half the poverty threshold ($9,536.50 per year or less for a family of 3)

6.4%

Adults aged 18-64 face a deep poverty rate of 6.4 percent while 3.2 percent of adults aged 65 years and over live in deep poverty. [vii]

Children experience deep poverty at the highest rates, with data showing that 6.8 million children—9.3 percent of all of America's children—were living in deep poverty in 2014.[viii]

Children under five years of age face the highest deep poverty rates (11.4 percent), followed by young people aged 18-24 (10.4 percent).[ix]

These families face multiple, persistent threats to their well-being and they and their children are more likely to remain poor than others who experience poverty.[x]

$11.9K

In 2014, a family of four earning $11,925 (50 percent of the poverty threshold) likely received less aid through TANF than a family of the same size earning $47,700 a year (twice the federal poverty line). [xv]

Before PRWORA, the AFDC program lifted 64 percent of otherwise extremely poor children out of deep poverty. In 2010, however, the TANF program lifted just 24 percent of deeply poor children above 50 percent of the poverty line.[xiv]

While 62.4 percent of low-income families living at two times the poverty line receive benefits from means-tested programs—including Temporary Assistance for Needy Families (TANF), the Supplemental Nutrition Assistance Program (SNAP) and child care subsidies–only 13.8 percent of families in deep poverty receive these same benefits.[xiii]

Families living in deep poverty are more likely to have lower levels of education, less work history, face work-limiting health conditions and poor mental or emotional health and are more likely to be caring for very young children or children with special needs.[xii]

Living in extreme poverty has lifelong consequences for children: they are more likely to experience chronic health conditions and mental and behavioral health difficulties, as well as poorer outcomes related to education and employment, among other negative outcomes that persist throughout their lives.[xi]

IMMIGRANT ACCESS TO THE SAFETY NET

Immigrant children and families in the United States—including those without legal status—often face significant challenges to accessing supports and services due to language and cultural and legal barriers. In some cases, these families are ineligible for many concrete supports in times of need, including federally funded TANF, Medicaid and SNAP. In other cases, linguistic and cultural barriers prevent families from accessing supportive services, such as mental health and substance abuse services. Ensuring immigrant families' access to the social safety net is particularly important given that children of disconnected, undocumented parents face a higher risk for lower preschool enrollment, reduced socioeconomic progress, higher rates of linguistic isolation, limited English proficiency and long-lasting poverty when compared with children of immigrants generally and the total population of children in the United States.[21]

PRWORA established a five-year waiting period for federal means-tested benefits for "qualified" immigrants (including Legal Permanent Residents (LPRs), refugees, asylees and other legal immigrants) to access federally funded services and prohibited states from using federal dollars to serve undocumented immigrants. This created a significant opportunity to use state funds to fill the gaps for immigrants who are ineligible for federally funded services—including both undocumented immigrants and lawful residents who have not reached their five-year waiting period. Twenty-two states currently leverage state funds, including General Assistance or similar programs, to supplant federal TANF services for immigrant families.[22] All nonexempt qualified immigrants are covered in 16 states, while the remaining six states only cover certain immigrants, (e.g., battered spouses and children).[23] In addition, five states (**California, Hawaii, Minnesota, New York** and **Washington**) provide state-only funded assistance for some nonqualified immigrants. For example, **California** and **Hawaii** provide assistance to most nonqualified lawfully present immigrants, and **Minnesota** provides assistance to individuals in temporary protected status.[24]

PRWORA also recognized the importance of supporting children of immigrants, many of whom are U.S. citizens. It calls for providing partial support to families who are either ineligible during the five-year waiting period or undocumented through ineligible immigrant parents (IIP) child-only grants that have no federal time limits or work requirements. Child-only benefit levels are calculated based on the number of eligible citizen children within the "assistance unit," although states have broad discretion in determining the benefit levels and income eligibility thresholds. Child-only cases account for roughly half of TANF cases, but very few child-only participants are immigrant families. In fact, immigrant families are unlikely to use IIP child-only grants, with take-up rates ranging from only three to 45 IIP cases per 1,000 undocumented families residing in a state (0.3-4 percent).[25] Research suggests that two factors influence immigrant families' likelihood to use child-only grants: benefit levels and income eligibility thresholds and whether a state's policy environment is hospitable[e] to immigrant families.[26] A posture of hostility toward immigrants and prospects of increased surveillance often isolate undocumented and mixed-status families, thereby preventing them from applying for and receiving benefits for which they are eligible for fear of alerting themselves to immigration authorities and becoming separated by immigration enforcement activities.

Several states and localities have already taken steps to better support immigrant families through IIP child-only grants by ensuring higher per-child benefit levels: **New Hampshire** and **New York** provide the highest per-child benefits levels at $539 and $460, respectively.[27] These benefits must also be accompanied by cross-system collaboration that is culturally competent and linguistically appropriate to promote immigrant families' awareness of programs for which they are eligible, including IIP child-only grants. States should use targeted outreach and engagement strategies to link disconnected immigrant families with resources in safe spaces where they already spend time, such as child care, schools, churches, hospitals and pediatrician offices. States and agencies must also make clear that information shared in the application process, including verification of income and citizenship status, will not be used or shared for the purposes of conducting immigration enforcement. These strategies are critical to encouraging and supporting immigrant families in accessing safety net supports and promoting equity for all children and families.

e. While immigration policy is largely a federal issue, states have broad discretion in providing certain services or extending state programs to immigrants, such as providing drivers' licenses or in-state tuition to undocumented residents. State and local law enforcement may also choose not to participate in federal immigration enforcement activities to promote trust between migrant communities and law enforcement agencies. For more information on state immigration policies, see Feliz, W. (2015). (*These Four Maps Illustrate How States Are Shaping Immigration Policy.*) Retrieved from http://immigrationimpact.com/2015/03/30/these-four-maps-illustrate-how-states-are-shaping-immigration-policy/

Families of Color and Poverty

African American and Hispanic families are more than twice as likely to experience poverty compared with white, non-Hispanic families. [xvi]

In 2014, Black and Hispanic communities faced deep poverty rates of 12.0 percent and 9.6 percent respectively, compared with 5.6 percent for their Asian and non-Hispanic white peers.[xvii]

Deep poverty rates for children of color were even higher, almost double (18.2 percent) for African American children and 12.9 percent for Hispanic children who are growing up in families living in extreme poverty, with income approximated by some researchers as less than $2 per person, per day. [xviii]

When looking at families of similar economic status, children of color are more likely to live in poor communities with poorer school districts that offer fewer job opportunities.[xix]

Not only do a disproportionate number of African American families experience poverty, but also exposure to poverty—for example living in neighborhoods with higher rates of poverty—at a disproportionate rate.[xx]

Recent data suggest that only one in 10 African American children has been raised in a neighborhood with less than 10 percent poverty, compared with six out of 10 whites. African American children also are far more likely to be raised in neighborhoods with more than 30 percent poverty compared with white children.[xxi]

SUPPORTING FAMILIES INVOLVED WITH BOTH TANF AND CHILD WELFARE THROUGH POLICY TARGETED TOWARD FAMILY WELL-BEING

Families involved with child welfare typically face multiple, complex barriers to success including language, mental health challenges, substance use and developmental and intellectual disabilities, each of which can impact their ability to successfully parent. When these challenges are coupled with extreme financial hardship, the climb to family success and well-being can seem insurmountable.[f] Not only do families of color experience poverty at higher rates, their children have higher rates of contact with child welfare systems and tend to have poorer outcomes once they are involved. Children of color are more likely to be removed from their homes. Their families are also less likely to receive family preservation services, and in the case of African American children, are more likely to experience longer stays in foster care.[28] The disparate representation of families of color in both public welfare programs and child welfare systems reinforces the importance of examining how TANF programs and child welfare systems can work together to support families.

f. See accompanying section on deep poverty for additional information and recommendations for supporting those living in deep poverty through TANF.

State TANF program requirements for work and training and their policies on sanctions can be particularly troubling for families also involved with child welfare. Some states have crafted solutions that recognize and try to address these families' multiple needs, but TANF policies in many states do not embrace opportunities for coordination and instead create additional barriers. Within state TANF flexibility, opportunities exist to better support families, and to address some of the inequities experienced by families of color who are over-represented in child welfare. Three opportunities to support families with complex needs involved in both public welfare and child welfare systems include:

1. Developing formal partnerships between public welfare and child welfare systems
2. Incorporating child welfare case plans into TANF program requirements
3. Supporting youth aging out of foster care to access concrete supports to meet individualized needs

Developing Formal Partnerships between Public Welfare and Child Welfare Systems

Families' inability to meet their concrete needs—including housing and food—directly impacts the likelihood they will come to the attention of the child welfare system. Many challenges related to child neglect, including unsafe housing, homelessness and lack of stable child care, disproportionately affect families of color, and in particular mothers of color with low-wage jobs. A study of families involved in New York City's child welfare system found that mothers of color are the most likely demographic to become involved with child welfare due in part to additional barriers associated with working low-wage jobs with inflexible schedules that directly impact their ability to obtain consistent and affordable child care.[29] When a family becomes involved with the child welfare system, the agency or court places additional requirements on the parent to either keep their children in their care or have their children reunified if they have been removed. However, formal partnerships that structure cross-system collaboration between TANF and child welfare programs can have a meaningful impact on family self-sufficiency and stability through supporting families in simultaneously meeting their concrete needs and their parenting needs. [30]

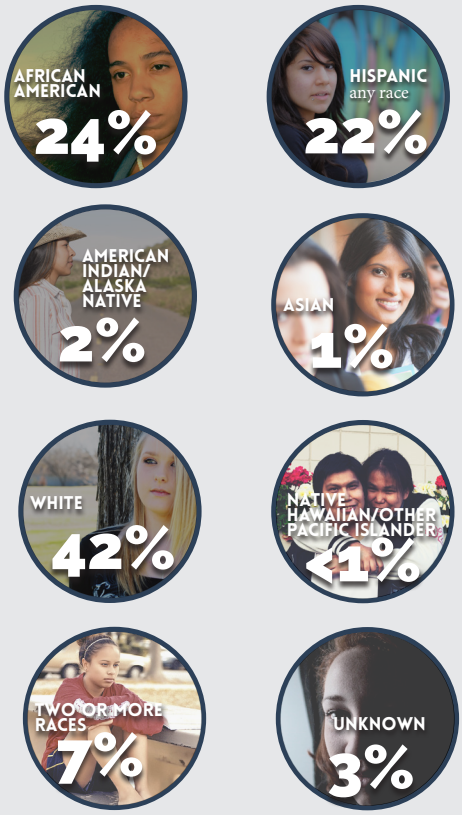
Many states allow parents to continue to receive adult-only TANF benefits when their children are removed and placed in foster care if the children's return home is reasonably anticipated[g] in the near future. This practice recognizes the importance of meeting parents' concrete needs as a critical aspect of providing a safe environment for their children and makes it possible for parents to fulfill the expectations of their child welfare case plan while maintaining housing stability for the future. Even when states provide this TANF option for parents, implementation varies between and within states. For example, when workers are not cross-trained, there can be confusion about the documentation required from the child welfare agency or court to verify that reunification will occur in the near future. An additional barrier is that many child welfare agencies and courts will not provide such documentation as they cannot predict when the safety concerns that led to the child's removal will be mitigated. Consequently, for these parents, TANF benefits are suspended and parents' poverty increases.

g. Definitions regarding the amount of time that is considered "reasonable" and benefits allowed for the parent vary by state.

Child welfare practitioners who are trained in TANF policy and procedures, as well as co-located TANF staff in child welfare offices can promote cross-systems collaboration to better support the well-being of families involved with both systems or who are involved with child welfare and are eligible for TANF support. Many states support co-located, integrated or coordinated staff**.** These staff assist multisystem involved clients by sharing information and helping to coordinate their case plans. While activities may not count toward requirements in both systems, the shared knowledge provides families with support in prioritizing and ensures caseworkers in both systems are aware of all case plan

FY2014 Foster Care Population

N=415,129



Source: U.S. Department of Health & Human Services, Administration for Children and Families, Administration on Children, Youth and Families, Children's Bureau. (2015). *AFCARS Report #22. Preliminary FY2014 Estimates as of July 2015.* https://www.acf.hhs.gov/sites/default/files/cb/afcarsreport22.pdf

FY2014 Victims of Maltreatment

N=702,208 Rates per 1,000 children

African American	15.3
Hispanic (any race)	8.8
American Indian/Alaska Native	13.4
Asian	1.7
Native Hawaiian/Other Pacific Islander	8.6
White	8.4
Two or more races	10.6

Source: U.S. Department of Health & Human Services, Administration for Children and Families, Administration on Children, Youth and Families, Children's Bureau. (2016). *Child maltreatment 2014.* Available from http://www.acf.hhs.gov/programs/cb/research-data-technology/statistics-research/child-maltreatment

requirements. Specifically, the **District of Columbia** has a case management structure that allows a family to select the case manager for their TANF Individual Responsibility Plan based on their relationships with workers from each system. For example, families who receive TANF and are also engaged with the child welfare and behavioral health systems can select a lead case manager from any of these agencies.

Incorporating child welfare case plans into TANF program requirements

Systems often focus exclusively on requirements mandated by their own agency and rarely coordinate efforts across systems to support families, resulting in not only multiple case plans but often conflicting requirements. Having multiple case plans that mandate compliance with strict requirements puts poor parents in a uniquely difficult situation: sometimes forced to decide whether to engage in the activities required by their child welfare case plan or the TANF program. If they neglect the TANF program requirements in favor of their child welfare case plan, they may lose TANF benefits and the ability to meet their concrete needs. If parents prioritize TANF program requirements over their child welfare case plan, they are at risk of losing custody of their children. For single parents,[32] who represent 45 percent of those receiving TANF benefits, the number of required activities on a child welfare and TANF case plans are especially challenging as these parents may be solely responsible for providing for their family and do not have a second parent to contribute to household income. For these parents, the decision to work toward reunification can mean a loss of the family's only income, which can lead to a loss of stable housing, access to health insurance and the ability to meet their daily needs.

Parents involved with child welfare often have scheduled visitation with their children, as well as multiple services on their case plan, which can include mental health, substance abuse and parenting classes. Parents working actively toward reunification are forced to juggle multiple appointments on a daily basis while meeting their TANF work requirements at the same time. When these work requirements and services are well coordinated, they can play a critical role in supporting family and child safety and reunification, as well as parental success in the workforce. Important mechanisms for public welfare programs to incorporate child welfare case plans include:

1. Allowing activities in a child welfare case plan to count as TANF work requirements
2. Providing TANF program extensions for parents involved with child welfare systems

TRIBAL TANF AND CHILD WELFARE CROSS-SYSTEM COLLABORATION

American Indian/Alaska Native (AI/AN) children are more likely to live below the federal poverty level and are disproportionately represented in child welfare systems. FY2014 data indicate that they are twice as likely to be victims of maltreatment, and FY2012 data showed them three times more likely to be in out-of-home care compared with white children. To understand how to better support (AI/AN) families, 14 tribes and tribal organizations received demonstration grants from the federal Office of Family Assistance for Coordination of Tribal TANF and Child Welfare Services to Tribal Families in 2011[31]. This five-year demonstration provided tribes and tribal organizations with opportunities to implement innovative and culturally responsive approaches to coordinate child welfare and tribal TANF services. The grantees focused on approaches that included:

- improved case management
- supportive services and assistance to tribal children in out-of-home placements
- prevention services and assistance to tribal families at risk of child abuse and neglect

Cook Inlet Tribal Council's *Everyone is Family (Luqu Kenu)* intervention addresses increased coordination and interoperability between Tribal TANF and the child welfare system. The intervention involves joint case planning by having a full-time intensive case manager who serves as a liaison between departments and conducts family assessments, initiates referrals for services, provides follow-up interventions and conducts home visits and training.

The *Athabascan Family Support Project* of **Tanana Chiefs Conference** employs Parent Navigators and Foster Parent Navigators who assist parents and relative caregivers with navigating the complexities of both systems to increase the families' access to and use of supportive services that are focused on TANF, state or tribal case plan objectives. Navigators work with their assigned families for up to six months; maintain weekly contact; participate in monthly joint meetings; and connect families with staff, services and resources.

Confederated Salish and Kootenai Tribes' *Family First Project* uses a strengths-based empowerment model for intensive case management that bridges the multiple systems that serve families and includes the development of individualized case plans. The approach includes coordinated intake/assessment, support services and referral to tribal and community resources, as well as advocacy on behalf of families with tribal and community agencies and systems.

Hoopa Valley Tribe implemented a *Multi-Departmental Action Team* that consists of Hoopa Tribal and Humboldt County human services programs. The tribal and county staff work together to identify and assess family needs and coordinate service delivery for child welfare-involved families and families at-risk of child welfare involvement. The meetings are chaired by the Hupa Family Resource Center who provides intensive case management services, as appropriate, to families.

The Adoptions and Safe Families Act of 1997 (ASFA) includes specific timelines for parents to engage in services to mitigate safety concerns that led to their child's removal and placement in foster care. ASFA requires that the status of each child in out-of-home care is reviewed at least once every six months through either a court or an administrative review[33] and that a permanency planning hearing must be held within 12 months of the date the child entered into out-of-home care.[34] If parents are unable to mitigate the safety concerns and the child remains in foster care for 15 of the most recent 22 months,[35] the child welfare agency can move to terminate parental rights.[36, 37, h]

h. The state can also move to terminate parental rights if the court determines that "reasonable efforts" are not required due to established federal guidelines (noted above) or other grounds that are specific to the state.

Allowing activities in a child welfare case plan to count as TANF work requirements

The services needed to support family reunification and engage in meaningful work can often be the same. In **California**, when a child has been placed in foster care or the family is required to engage in services for the child to remain safely in the home, child welfare case plan activities are allowed to fulfill TANF work participation requirements or work participation requirements are suspended until the child welfare case plan is completed. In addition, participation in mental health, substance abuse or domestic violence services can count as work hours for parents. Allowing for these services to count as work requirements acknowledges their importance to improving overall family well-being.

California further supports families who are balancing both child welfare and TANF requirements through intensive case coordination and the Linkages Program.[38] The Linkages Program, funded by the Department of Social Services, addresses the multiple challenges families in both systems face through ensuring that parents are addressing their immediate needs, improving potential safety concerns that led to their involvement with child welfare and promoting family strengthening activities. This approach to supporting parents and families with the most complex needs creates a targeted opportunity for long-term success through improved safety and well-being for the child and increased likelihood of self-sufficiency for the family. An evaluation of the program found many promising results including that in nine of 11 counties, families involved with Linkages had greater success in resolving TANF sanctions compared with families in the comparison group. Among 14 counties, two-thirds showed that families involved with the program had fewer substantiated repeated occurrences of maltreatment within three months compared with the comparison group. Specifically in Los Angeles County, the evaluation noted that through the collaboration between child welfare and CalWORKs staff, children experienced fewer removals from their homes due to the CalWORKs services and resources provided to families. Additionally, California saw an increase in families' participation in California's workforce development program through integrated case plans.[39]

Providing TANF program extensions for parents involved with child welfare systems

States have the flexibility to define "hardships" that allow families to continue receiving TANF benefits even when they have reached the 60-month time limit.[40] Five states—California, Kansas, Missouri, North Carolina and Washington—have created hardship extensions that recognize the impact of child welfare system involvement on a parent's ability to prioritize TANF requirements. Welfare rules in these five states include involvement and participation in child welfare services as a reason for a TANF extension.[41, i] In **North Carolina,** participation in family services, which prevents full-time employment, can qualify a family for a hardship extension if a parent has one or more children in the home receiving child welfare services. Other states have also recognized that parents with the most complex problems often need behavioral and mental health supports to remove barriers to work and have implemented extension reasons based on a parent's involvement in substance abuse or mental health treatment.[42, 43]

i. States have the option to extend assistance beyond the five-year limit for federally funded assistance for a maximum of 20 percent of their average monthly number of cases. This can look different between states: 1) A state may opt to extend assistance to a particular family only once an adult in the family has received 60 cumulative months of assistance. After the family reaches the 60-month limit; families may be exempt from termination and get extended benefits under the 20 percent cap. 2) Months in which a family receives cash assistance funded with Welfare-to-Work (WtW) monies count toward the five-year limit; months in which a family receives only noncash assistance under WtW do not count towards the five-year limit so families may receive assistance funded with WtW grant funds after they have received 60 months of assistance even though they are precluded from receiving other TANF assistance because of the five-year limit.

Supporting Youth Aging Out of Foster Care to Access Concrete Supports to Meet Individualized Needs

More than 20,000 **youth age-out of foster care**[j] every year without having been reunified with their caregivers or finding a permanent home through guardianship or adoption.[44] These youth face multiple barriers once they age-out of foster care and often are alone without permanent connections. Current data show that youth who age-out of foster care are more likely to experience fewer educational and employment opportunities. They are also more likely to face homelessness, early pregnancy, lack access to health coverage and have higher rates of involvement with the criminal justice system compared with peers who did not age-out of foster care.[45] Homelessness directly impacts a youth's ability to consistently attend school or work. Data from the National Youth in Transition Database indicate that at age 19, only 12 percent of former foster youth surveyed[46] were employed full-time and 23 percent were employed part-time. Research also has found that college attendance among former foster youth is considerably higher when young people have access to extended foster care, which provides support for housing, food and health insurance until their 21st birthday[k] when compared with youth who did not have access to this support and aged-out of foster care at 18 years old.[47]

j. Since the Fostering Connections to Success and Increasing Adoptions Act (2008), states have had the option to expand eligibility for foster care services for youth until their 21st birthday.

k. As of July 2016, 27 states have elected to extend foster care beyond age 18 years. With the exception of Indiana, which has extended foster care until 20 years of age, the remaining 26 states have extended care until 21 years of age. The map of states that have extended foster care can be found here: http://www.cssp.org/policy/2016/STATEs-with-extended-foster-care-MAP.pdf.

These data highlight the importance of providing targeted employment training and supports that incentivize work and education without compromising a young adult's ability to draw down concrete supports, thereby ensuring better outcomes for

these young people. To support these young people, TANF programs should:

1. Address the developmental needs of youth aging out of foster care in education and employment programs

2. Develop public welfare and child welfare partnerships to ensure that youth are connected to safety net programs—including SNAP, housing, child care and health insurance—for comprehensive support

3. Provide individualized support for expectant and parenting youth aging out of foster care

Address the developmental needs of youth aging out of foster care in education and employment programs

TANF employment activities for young adults, particularly youth who have aged-out of foster care, should be designed to meet adolescents' developmental needs, as well as account for the impact of trauma (often associated with experiences that led to the youth's involvement with child welfare or occurred during their involvement with child welfare) on the development of youth who have aged out of foster care. In addition to supporting workforce development and education through targeted TANF programming, states should allow co-enrollment between Workforce Innovation and Opportunity Act Title I Adult and Youth Programs and Title II programs for out-of-school youth as youth leaving foster care transition to adulthood and identify appropriate educational or employment opportunities.

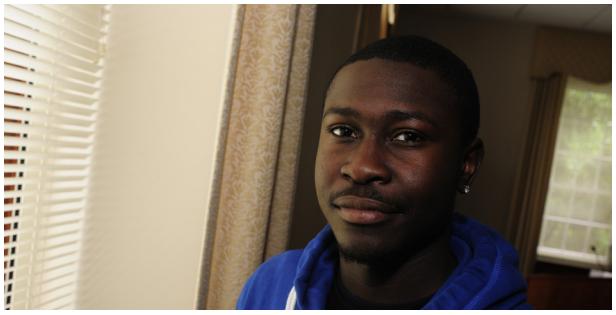
Develop public welfare and child welfare partnerships to ensure that youth are connected to safety net programs, including SNAP, housing, child care and health insurance, for comprehensive support

Public welfare and child welfare systems should designate a specific liaison to work with youth who have aged out of foster care so that youth are engaged as active participants in the case planning process and ensure they receive all of the benefits to which they are entitled. By connecting youth aging out of foster care to concrete supports, including health care (which they are categorically entitled to until age 26 under the Affordable Care Act), food assistance and child care subsidies, states can provide youth with an integrated safety net. When youth aging out of care have their concrete needs met, they can be actively engaged in other efforts to increase their academic potential and capacity to be economically successful in the future.

Provide individualized support for expectant and parenting youth aging out of foster care

Youth in foster care are more likely than their peers to be expectant or parenting. Data from the Midwest Evaluation show that young women who had aged out of care were 1.8 times more likely to be parenting and young men who had aged out of care were almost twice as likely to be parenting.[48] In addition to meeting their own concrete needs, these young parents must be supported to meet the needs of their children, including ensuring stable child care, health care and educational services.

A few states, including **Washington, Utah** and **Nevada,** consider minor parents eligible for a hardship extension in TANF benefits. It is critical that all states recognize the importance of supporting young parents transitioning from foster care. States should not only provide these young parents with an extension. It is also important to use TANF enrollment as a trigger for ensuring that young parents are connected to WIC and SNAP and that they are receiving child care subsidies. By meeting these concrete needs, youth are more likely to achieve their goals, including pursuing education and gainful employment, which are directly in line with TANF program goals.



Recognition of adolescent brain research – which indicates that the brain is still developing beyond 18 years of age through 26 years old – and the impact of trauma on brain development has been featured prominently in many recent pieces of federal legislation including the Fostering Connections to Success and Increasing Adoptions Act (2008), Affordable Care Act (2010) and Families First Prevention Services Act (2016) (currently under consideration in Congress in August 2016), which all include supports for older youth who are aging out or who have aged out of foster care, such as including eligibility for:

- Education and Training Vouchers up until age 26
- Title IV-E funding for the extension of foster care up until age 21
- Financial, housing, counseling, employment, education and other appropriate supports and services to former foster youth until age 23 through the Chafee Program
- Categorical eligibility for Medicaid health coverage up to age 26

Intervening System Involvement

In FY 2014, there were **415,129** children and youth in foster care. Of those, 24 percent were African American, 22 percent were Hispanic (any race) and 2 percent were American Indian/Alaska Native.[xxii]

More than half **(55 percent)** of the children in foster care are children of color. These data are likely an underestimate of the disproportionate number of children of color involved with child welfare systems because it does not account for children who are able to remain in their homes with a safety plan. Furthermore, states' lack of compliance with the Indian Child Welfare Act (ICWA) leads to an underestimate of American and Indian and Alaska Native children.

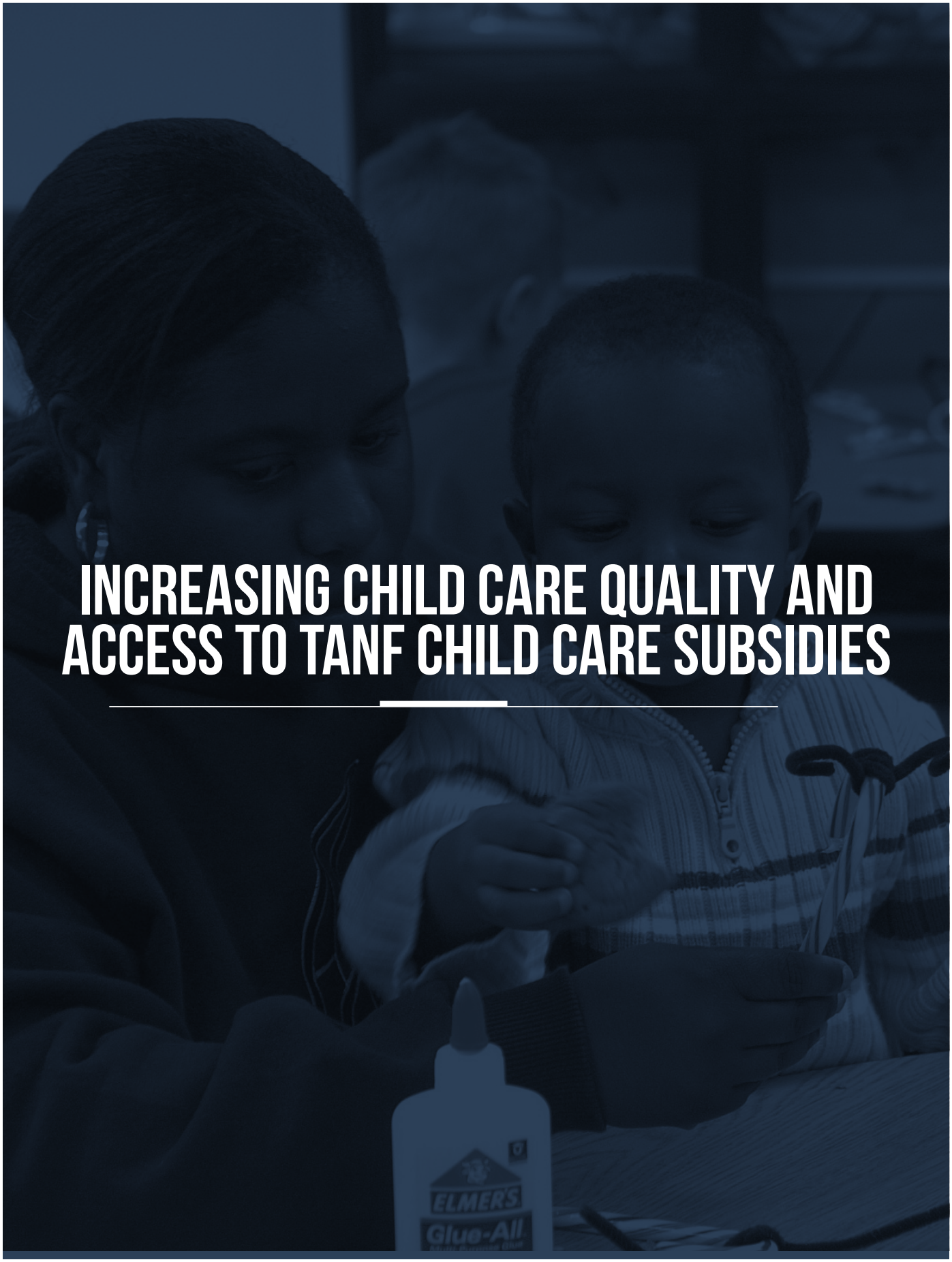
Poverty is the greatest threat to child well-being and the best predictor of abuse and neglect.[xxiii]

Nearly half of families **(47 percent)** who have their children removed from their homes have trouble paying for basic necessities.[xxiv]

The Fourth National Incidence Study of Child Abuse and Neglect found that children living in poor and low-income households experience significantly higher rates of maltreatment than children living in more economically secure homes.[xxv]

A study of families involved in New York City's child welfare system found that mothers of color are the most likely to become involved with child welfare due in part to additional barriers associated with working low-wage jobs with inflexible schedules that directly impact their ability to obtain consistent and affordable child care.[xxvi]

INCREASING CHILD CARE QUALITY AND ACCESS TO TANF CHILD CARE SUBSIDIES



PRWORA created two programs designed to meet the child care needs of low-income families: the TANF program that allows direct funding for child care and the Child Care Development Fund (CCDF).[49] CCDF is a mandatory block grant that specifically funds child care assistance to low-income families seeking to work or attend job training or educational activities. It gives states more flexibility to design child care policies.[50] Inherent in the design of PRWORA are provisions that establish connections between TANF and CCDF. A 2016 Information Memorandum from the Office of Family Assistance calls out the following links:[51]

- TANF funds may be spent directly on child care and up to 30 percent of TANF block grant funds may be transferred to CCDF. Once transferred, funds must be spent according to CCDF regulations.
- At least 70 percent of CCDF funds must be prioritized to meet the child care needs of families receiving, transitioning off of or at risk of becoming dependent on TANF cash assistance.
- Single custodial parents of children younger than age six receiving TANF must be informed that they cannot be sanctioned if they demonstrate an inability, as determined by the state, to obtain appropriate child care within a reasonable distance from home or work; suitable informal child care by a relative; or other arrangement or appropriate and affordable formal child care.

Policy Opportunities to Increase Access to High-Quality Child Care

The Child Care and Development Block Grant (CCDBG),[52] which authorizes the CCDF program, is the primary federal funding source for child care subsidies to low-income working families and in most states for the child care system and quality improvement infrastructure.[53] Approximately 14 percent of families receiving CCDBG subsidies report receiving TANF assistance,[54] with many states and territories prioritizing or guaranteeing child care for families receiving TANF.[55] Eligible children from families with the lowest incomes are the most likely to receive child care assistance through CCDBG. Roughly 33 percent of federally eligible children served are from families with incomes below 100 percent of the poverty level and 19 percent are from families with incomes between 100 percent and 149 percent of the poverty level.[56] Unfortunately, CCDBG does not reach all federally eligible children, with only 15 percent of the 14.2 million eligible children receiving the subsidy in 2012.[57]

States can bridge this gap by using TANF funds to supplement CCDBG resources. TANF's inherent flexibility enables states to allocate substantial resources to services and supports that facilitate a recipient's involvement in work or training through supporting programs including child care.[58] States have the ability to either transfer TANF funds to CCDBG or spend TANF or Maintenance of Effort (MOE)[l] funds directly on child care for recipients. By transferring or expending TANF funds on child care services, states can also make additional funds available to expand child care quality activities under CCDBG, including funding professional development activities, increasing payment rates to allow for better compensation of child care workers and establishing or enhancing incentives for providers who attain accreditation.[59]

l. TANF's "maintenance of effort" (MOE) requirement mandates that states continue to spend at least 75 percent of the amount that they did prior to the enactment of PRWORA on programs serving needy families. The MOE is raised to 80 percent for states that fail to meet the work participation rate requirement. For more information please see TANF 101: Block Grant and Guide to Use of TANF and MOE Funds by Elizabeth Lower-Basch of CLASP.

In November 2014, President Obama signed into law the Child Care and Development Block Grant Act of 2014[60] with broad bipartisan Congressional support, strengthening the subsidy's dual role as a major early childhood education program and a work support for low-income families.[61] The law supports goals intended to improve the health, safety and quality of child care while making it less burdensome for families to access stable child care assistance.[62] The law also seeks to boost the quality of child care services by increasing the minimum quality spending requirement mandating that states reserve a portion of their funds for activities aimed at improving child care quality, increasing parental options and increasing access to high-quality care.[63] Given the legislative histories of both CCDBG and TANF, the new law will impact the recipients, providers and administrators of child care subsidies served through both programs. While TANF Lead Agencies have the flexibility to determine rules governing TANF-funded child care programs, TANF agencies also have the ability to leverage improvements in CCDBG to improve TANF-funded child care programs, simultaneously promoting the goals of both programs.[64]

Meeting the Child Care Needs of Low-Income Families through Targeted State Efforts

When coordinated in a way that supports both program's goals, TANF and CCDBG are well-suited to meet the needs of poor children and their working caregivers. States should look to CCDBG as a model to accomplish the following in their own state's TANF child care policies:

1. Prioritize child care subsidies for families facing the greatest barriers
2. Establish 12 months of continuous eligibility for recipients of child care subsidies to promote continuity of care, accommodate families with nonstandard schedules and eliminate systemic churn
3. Expand the supply of accessible, affordable, high-quality child care for families living in areas with high concentrations of poverty through the use of grants and contracts
4. Intentionally target expenditures to activities and programs that seek to advance equity by improving outcomes for children of color and children who are dual-language learners
5. Intentionally target outreach and consumer education activities to ensure that low-income families of color are informed of and have access to subsidies and other services for which they are eligible

Prioritize Child Care Subsidies for Families Facing the Greatest Barriers

The TANF program is primarily focused on the responsibility of parents as financial providers and as such often fails to fully address the additional caregiving responsibilities that are legitimate barriers to becoming meaningfully involved in the workforce. Stronger coordination between programs that aim to meet the needs of these parents and their young children is needed for TANF to achieve its goals. Key provisions in CCDBG can serve as the vehicle for producing positive results for families served by these programs. Parents battling substance abuse, mental illness and chronic illness find that employment and training opportunities are often difficult to manage while attempting to address these immediate health concerns. Additionally, for families experiencing homelessness or involvement in child welfare systems, the additional requirements and competing priorities can limit their success in the workforce. Families need access to stable high-quality child care programs that offer a compendium of wrap-around services and supports, ensuring their children have stable care while parents strive to successfully participate in the workforce.

m. States should also consider prioritizing services for young children who may not be in foster care, but have a young parent who is in foster care or receiving protective services.

CCDBG prioritizes services for children experiencing homelessness, children involved with child protective services and children at risk of involvement with protective services.[m] TANF child care policies should also prioritize these groups and consider prioritizing the needs of other families facing significant barriers. These children and families should also be categorically eligible for waivers of income eligibility and work requirements. Once eligible, they should be added to the list of families with the greatest needs for whom differential payment rates may be set as an incentive for providers to serve them. To build and sustain the supply of services for these young children and families, states should use grants and contracts that couple higher standards of care (including trauma-informed practice, wrap-around services and other supports that are specific to the needs of these vulnerable families) with financial incentives, training and technical assistance and other supports to providers.

To assist homeless families in becoming self-sufficient, **Virginia's** Child Care for Homeless Children Program (CCHCP) uses funds made available through CCDBG to provide homeless families in emergency shelters and rapid re-housing programs with a broad range of child care options.[65] Families may begin receiving child care subsidy services when an eligible parent signs the Parent Application for CCHCP Services, when the family begins residing in the emergency shelter or signs a lease in a rapid re-housing program.[66]

California offers a variety of child care subsidy programs administered through the Department of Social Services and the Department of Education. Many of the programs streamline enrollment for children receiving child welfare services—in some cases waiving income requirements and giving priority status to children involved in Child Protective Services through the California Department of Social Services.[67]

Establish 12 Months of Continuous Eligibility for Recipients of Child Care Subsidies to Promote Continuity of Care, Accommodate Families With Nonstandard Schedules and Eliminate Systemic Churn

Volatile job schedules are increasingly characteristic of employment for low-income earners, with approximately half of low-wage hourly workers[n] having nonstandard[o] schedules.[68] These workers often find it extraordinarily difficult to meet their needs and those of their families due to their changing and often unstable work environments.

n. Low-wage workers are those whose full-time, annual hourly wages place them below the poverty level. The federal poverty level for a family of three (one adult and two children) was $19,073 in 2014.

o. Falling outside of Monday through Friday daytime hours.

Women and people of color are over-represented in this low-wage workforce. Although women make up less than half of all workers, they comprise two-thirds of the nearly 20 million workers in the low-wage workforce, and nearly half of these women are women of color.[69] Half of the women in the low-wage workforce are employed

full-time and close to one-third of these workers are mothers—with 40 percent of them having family incomes below $25,000 per year.[70]

Low-income parents represented in this workforce find it difficult to secure stable child care that also allows them to obtain additional employment to supplement their income or participate in school or training programs that facilitate career advancement.[71] Inconsistent work (and often pay) schedules in this form of employment create barriers to accessing child care subsidies due to reporting requirements and often force parents to make piecemeal arrangements for the care of their children. State TANF requirements mandating that families report changes in work schedules and income become particularly burdensome to those with nonstandard schedules. Small changes in families' employment patterns may render them eligible one month and ineligible the next. Families therefore churn[p] in and out of the TANF and child care subsidy systems. This churn creates undue burden in the lives of these families, child care providers and the subsidy agencies as well, often disrupting the continuity of the family's child care.

p. Families able to access child care subsidies often experience churn – the removal of families from benefits that they are eligible to receive, only to return within a short timeframe.

States can use CCDBG as a model for family-friendly TANF policy. To provide families with stability and facilitate families' continuous access to child care subsidies, the law establishes a 12-month eligibility period for subsidy recipients. In the event that a subsidy recipient is terminated from employment, the law extends coverage for three months of a job search. The law also provides families whose subsidies are pending termination from TANF with three full months of assistance to soften the effects of a cease in benefits. While the law does not address interim reporting,[q] states should eliminate requirements mandating that families report changes in income or employment during the 12-month eligibility period in both CCDF- and TANF-funded child care programs. States that choose to continue requiring interim reporting for child care subsidies should not take action to change a recipient's subsidy in ways that would decrease or terminate a families benefits until the next redetermination period at the end of a full 12 months.

q. The pending CCDF rules will offer clear direction in this area upon completion.

Delaware is one of a few states that only requires documentation for verification of employment and income for child care subsidy as opposed to, for example, documentation related to applicants identity, relationship to the child and immunization records.[72] Once eligibility has been approved, all child care subsidy recipients remain eligible for a full 12 months of assistance and must report changes in their status only when the child moves out of, or is removed from, the parent's or caregiver's home; the child moves out of state; the child dies; or the parent or caregiver does not cooperate with child support requirements.[73] Additionally, the child care parent fee does not change during the authorization unless a parent or caregiver loses his or her job.[74] Delaware has also aligned eligibility periods with other benefit programs administered in the state so that renewal for all programs occurs in one process.[75]

Expand the Supply Of Accessible, Affordable, High-Quality Child Care for Families Living In Areas With High Concentrations of Poverty Through the Use of Grants and Contracts

Research shows that participation in high-quality early childhood and school readiness programs improves educational outcomes for low-income children and children from cultural and linguistic minority groups.[76] However, many families lack access to affordable, high-quality child care options.[77] Communities that are low-income and rural often face shortages of licensed, high-quality child care. These areas are known as ***child care deserts***.[78] For rural families, an increasing majority of whom are Hispanic,[79] lack of licensed child care, long travel distances to work sites, lack of public transportation and volatile work schedules greatly reduces child care options.[80]

States can support the fixed costs of providing child care services through the use of grants and contracts. CCDBG provides states with the option to reserve a portion of their subsidy funds for direct service grants and contracts. The use of grants and contracts are particularly important because they increase the supply of quality child care for underserved or vulnerable populations by "purchasing" spaces directly from the provider that are reserved for subsidy-eligible families.[81] While the law states that grants or contracts should not be favored over the use of child care certificates (vouchers), both state CCDBG and TANF child care administrators should consider their use in cases where certificates are insufficient to sustain or expand the market of high-quality options. In such cases, grants and contracts can guarantee a stable source of funding which reduces the financial risk for providers and incentivizes provider participation in the subsidy program. Additionally, states can incorporate quality requirements directly into the grants and contracts and use quality dollars[r] to provide financial incentives (such as tiered payments[s]), targeted training and technical assistance, wrap-around services and other supports to encourage

r. CCDBG quality dollars provide state's child care systems with the resources needed to make improvements to the system's infrastructure by funding program monitoring and licensing, resource and referral agencies, professional development and additional quality initiatives preparing children for school.

s. Providers accepting child care subsidies can receive tiered payments or reimbursements from the state for providing families with higher levels of quality, special needs care, non-traditional hour care and care for infants and toddlers. The higher the tier, the greater the payment.

provider participation.[82]

Young children and families served in child care centers that used grants in **Pennsylvania** benefited from an increased quality of care. Grants enabled centers to both offer services to a wider range of age groups and to begin or continue providing services to low-income families.[83] Grants also enabled quality improvements that eventually led some centers to apply for accreditation and for some enters to offer expanded operating hours at the end of the grant period, including weekend and evening hours.[84] This is particularly important for parents or caregivers with nonstandard schedules. Additionally, centers that used grants were also able to increase teacher and staff salaries and more centers were able to offer benefits to teachers and staff[85] – likely reducing staff turnover and increasing retention.

Intentionally Target Expenditures to Activities and Programs that Seek to Advance Equity by Improving Outcomes for Children of Color and Children Who Are Dual Language Learners

Across the United States, young children of color disproportionally live in low-income households compared with their white counterparts,[86] with 44 percent of black, 42 percent of American Indian and 34 percent of Hispanic children from birth to age 3 living in poor families.[87] This is especially troubling as child poverty is associated with a host of negative life outcomes that extend well beyond childhood, including lower rates of academic achievement and educational attainment and higher incidences of antisocial behavior and chronic illnesses.[88] Of the 24 percent of U.S. children living in an immigrant household, 90 percent of these children are U.S. citizens,[89] making them eligible—contingent on additional factors—to receive child care subsidies. Of children living in immigrant households, 56 percent reside with a parent who is limited English proficient (LEP) and nationally, 22 percent of children speak a language other than English at home.[90]

Research shows that offering high-quality early childhood and school readiness programs can improve educational outcomes for low-income and cultural and linguistic minority children.[91] Given the diverse demographics of young children and families in the nation, a key component of quality early childhood programming is cultivating a culturally competent, ethnically and linguistically diverse workforce well-prepared to foster every child's healthy development.[92] Culturally competent programs include those that use curriculum, instruction and assessment practices that support home language development, offer professional development opportunities that give teachers the skills to work effectively with diverse cultural and linguistic groups and engage meaningfully with families.[93] The CCDBG Act of 2014 provides states with an opportunity to meet the needs of young children of color and a growing population of young children learning two or more languages at home. State child care subsidy administrators using both CCDBG and TANF funds should intentionally target expenditures on quality improvement activities that will demonstrably increase access to high-quality child care settings that support the unique needs of children of color, immigrant families and children from dual language families.

Funded in part by CCDF, Bright from the Start: **Georgia** Department of Early Care and Learning (DECAL) has emphasized supporting dual language learners (DLLs) through culturally competent professional development and family engagement initiatives.[94] Recognizing that Spanish-speaking DLLs were entering and leaving Georgia's universal pre-Kindergarten (pre-K) program significantly behind their monolingual English-speaking peers on all outcomes,[95] DECAL decided to provide a summer program to support children from homes where Spanish is the primary language as they transition to pre-K.[96] Georgia's free Rising Pre-Kindergarten (RPre-K) Program exclusively serves DLL children from low-income families whose predominant home language is Spanish for six weeks.[97] Each RPre-K classroom is comprised of a lead teacher and an assistant teacher one of whom is a Spanish speaker, and a half-time transition

According to the PRWORA, the child's citizenship and immigration status determines eligibility for child care subsidies, regardless of the status of their parents or caregivers. To ensure children of immigrants receive child care subsidies, both CCDBG and TANF administrators should implement the following strategies:

1. All applications and subsequent materials must make clear that eligibility is based solely on the status of the child and that any information obtained during the process will not be used for immigration enforcement purposes.
2. Engagement efforts and consumer outreach must be linguistically and culturally responsive to diverse providers and families in safe and accessible spaces.
3. As subsidy eligibility is also contingent on participation in an approved work or education/training activity, consider ways to reduce undue burden for families in their attempts to provide proof of employment or enrollment – such as accepting employer-provided income verification.

coach to help families meet transition needs and to offer parent educational activities and support services.[98]

Intentionally Target Outreach and Consumer Education Activities to Ensure that Low-Income Families of Color Are Informed of And Have Access to Subsidies and Other Services for which They Are Eligible

All too often, parents (particularly low-income parents) lack access to available information about resources that can help them make informed decisions about their young children's care and education. Both CCDBG and TANF administrators should partner with, support and invest in parents and service providers through targeted engagement efforts that are linguistically and culturally responsive to diverse populations in an effort to meet the child care needs of low-income families of color. States should also take into account the needs of families with limited literacy skills, who are LEP or lack access to a computer or the internet as most consumer information is offered online. Administrators should use culturally and linguistically responsive outreach strategies that are delivered in environments where families come into direct contact with other individuals in spaces such as pediatricians' offices and other healthcare offices, labor organizations, schools and resource and referral organizations. These places often provide a unique entry point to identify, engage and support families.

CCDBG serves as a model example for state TANF child care policy in that states can use funds to bolster activities that support the training and professional development of the child care workforce. These investments in the professional development of child care providers can equip them with culturally and linguistically appropriate outreach strategies that expand parents and families capacities to support their children's learning and development.[99] The law also requires states to engage in consumer education and outreach activities and explicitly identifies a number of items[t] that states must provide to parents receiving a child care subsidy, the general public and, where applicable, child care providers.[100] State TANF child care policies should replicate these same engagement efforts.

t. States must make public information regarding other financial assistance programs that families might be eligible for; programs carried out under the Individuals with Disabilities Education Act (IDEA); research and best practices concerning children's development; policies regarding the social-emotional behavioral health of young children; and information regarding developmental screenings.

Funded in part by CCDF, **Connecticut's** Family Resource Centers promote comprehensive, integrated, community-based systems of family support and child development services located in public school buildings. These community-based centers provide families with access to a broad continuum of early childhood and family support services that foster the optimal development of children and families.[101] In addition to these centers, the **Connecticut** Office of Early Childhood features a number of programs on its website that are available to provide services to help children and their families.[102]

Conclusion

Access to Child Care

On average, 61 percent of the nation's children from birth to age 5[xxvii] and their families regularly participate in a child care arrangement.

Poor families often face additional barriers associated with working low-wage jobs with inflexible schedules that directly impact their ability to obtain consistent and affordable child care.[xxviii]

When poor families are able to access child care, it is too often low-quality, with low-income parents of children age five or younger being more likely to report concerns about their child's learning, development or behavior than their peers in higher-income families.[xxix]

For TANF to successfully meet the needs of families facing multiple barriers, the program has to focus on the unique needs of families living in deep poverty, families involved with child welfare systems and families with young children. There are several strategies that states could adopt today that could help support these families as they work toward economic stability – strategies that should also be considered as a part of larger welfare reform.

To support the families that are least connected to work opportunities and who are living in deep poverty TANF programs could use sanctions as triggers to connect recipients to wrap-around services, improve employment prospects for recipients with significant challenges to work and target policy toward families approaching time limits before their benefits erode.

Implementing formal partnerships between public welfare and child welfare systems, incorporating child welfare case plans into TANF program requirements and supporting youth aging out of foster care in accessing concrete supports are all strategies that would better integrate child welfare and public welfare program requirements—lifting barriers for families and promoting opportunities for children to remain safely with their parents while they work toward economic stability.

For families with young children, who often face considerable costs and struggle to access high-quality child care, there are several strategies that have the potential to significantly impact their success both as parents and in the workforce. These strategies include prioritizing child care subsidies for families facing the greatest barriers; establishing 12 months of continuous eligibility for recipients of child care subsidies; accommodating families with nonstandard schedules; expanding the supply of accessible, affordable, high-quality child care for families living in areas with high concentrations of poverty through the use of grants and contacts; intentionally targeting expenditures to activities and programs that seek to advance equity by improving outcomes for children of color and children who are dual language learners; and intentionally targeting outreach and consumer education activities to ensure that low-income families of color are informed of and have access to subsidies and other services for which they are eligible.

Families living in deep poverty, families who experience child welfare involvement and families with young children are often the same families. To support these families as they work to raise healthy children and gain access to and succeed in the workforce, it is critical to focus on the complex and interconnected barriers they face. All families have the potential to be safe, healthy and economically successful. Investing in families facing multiple barriers through the TANF program is an important step in helping all families thrive and achieve their goals.

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