

The IRA: Individual Responsibility Agreements and TANF Family Life Obligations

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THE IRA

INDIVIDUAL RESPONSIBILITY AGREEMENTS AND TANF FAMILY LIFE OBLIGATIONS

Background. The 1996 welfare law, Temporary Assistance for Needy Families [TANF], includes a specific provision entitled Individual responsibility plans.¹ One part of the provision requires that each state agency conduct an assessment of the recipient within a prescribed time frame; it is then a state option whether to develop an activities plan based upon the assessment.

Most states developed, or already had in place, some type of activities plan for participants. These plans take a variety of shapes. Many states have employability plans that address the activities and timing associated with job search, job training, etc. Some states also focus on more personal activities, such as immunization of children. Some states have one document that is an employability plan and another that addresses personal obligations; other states combine these activities in a single plan.

While an individual responsibility plan may prove useful in establishing family life obligations, the plan creates concern in those situations where:

\$ the form itself generates ineligibility;

In Tennessee, over 3,500 families lost assistance because they did not sign the state's individual responsibility plan.²

\$ the form substitutes for more thorough information about the terms of the obligation;

The majority of states with explicit family life obligations use boilerplate forms that merely list obligations; these may or may not be augmented with more detailed information for recipients and their families.

\$ the form creates inappropriate obligations;

A parenting class obligation may have the desired result of improving the capacity to parent effectively; however, it is inappropriate to expect the obligation to be fulfilled if the recipient faces a transportation barrier.

\$ the obligations of the individual but not of the state are defined.

Half of the states with individual responsibility plans fail to mention any state obligation; those that do mention some obligation often limit state engagement.

The IRA. This document seeks to identify the family life obligations required in individual responsibility agreements³ used by welfare agencies. This analysis is based upon a review of state documents called *personal responsibility plans* or *personal responsibility agreements* or any similar name; since the focus is on family life obligations, this analysis does not include a review of employability plans⁴ that solely address work activities. In this text, we refer to the *individual responsibility agreement*, or IRA.

Parameters. If a state establishes individual responsibility agreements following the required assessment, the state decides such fundamentals as:

- \$ who must sign
- \$ who the agreement applies to (e.g., the signer only; all family members)
- \$ whether the agency assumes any obligations
- \$ the types of obligations for the agency
- \$ the types of obligations for the family
- \$ the consequences if the agency does not fulfill its part of the agreement
- \$ the consequences if the family does not fulfill its part of the agreement (e.g., partial sanction; family termination)
- \$ the time frame for completing obligations
- \$ the capacity to revise obligations
- \$ the capacity to appeal adverse decisions based on the agreement

The federal statute only binds states to conduct an assessment; while the law lists types of obligations that might be imposed in a plan following the assessment, the statutory list is illustrative, not obligatory. Nevertheless, in establishing the state option, Congress communicates to the states its recommendations for the contents of individual responsibility agreements.

Family Life Obligations. Congress listed a set of personal obligations related to family life that could, but are not required to be, included in the optional individual responsibility plan. Under a plan, an individual may be required to:

- \$ attend school
- \$ maintain certain grades and attendance
- \$ keep school age children in school
- \$ immunize children
- \$ attend parenting and money management classes

\$ Aor do other things that will help the individual become and remain employed in the private sector.@

In addition, the law notes the plan

\$ A may require the individual to undergo appropriate substance abuse treatment.@

The Congressional list is illustrative; states are free to add additional requirements.

Family Members. The law requires states to conduct assessments for each individual who:

\$ is 18 years or older or
\$ not completed high school (or equivalent) and not attending secondary school.

States are free, under TANF, to mandate assessments of other family members; if a state chooses to develop an IRA, it could apply the IRA to everyone who is assessed.

TANF Sec. 408(b)
Individual Responsibility PlansB
A(1) ASSESSMENT-- The State agency responsible for administering the State program funded under this part shall make an initial assessment of the skills, prior work experience, and employability of each recipient of assistance under the program who-
A(A) has attained 18 years of age; or
A(B) has not completed high school or obtained a certificate of high school equivalency, and is not attending secondary school.
A(2) CONTENTS OF PLANS.--
A(A) In General.BOn the basis of the assessment made under subsection (a) with respect to an individual, the State agency, in consultation with the individual, may develop an individual responsibility plan for the individual, whichB
A(i) sets forth an employment goal for the individual and a plan for moving the individual immediately into private sector employment;
A(ii) sets forth the obligations of the individual, which may include a requirement that the individual attend school, maintain certain grades and attendance, keep school age children of the individual in school, immunize children, attend parenting and money management classes, or do other things that will help the individual become and remain employed in the private sector;
A(iii) to the greatest extent possible is designed to move the individual into whatever private sector employment the individual is capable of handling as quickly as possible, and to increase the responsibility and amount of work the individual is to handle over time;
A(iv) describes the services the State will provide the individual so that the individual will be able to obtain and keep employment in the private sector, and describe the job counseling and other services that will be provided by the State; and
A(v) may require the individual to undergo appropriate substance abuse treatment.

Some states require IRAs of all recipients; others make exceptions (e.g., no IRA required for one-time diversion payments or for Achild-only@ cases). This paper identifies those IRAs that require more than the recipient to be a party to the IRA; however, it does not include information about state policy regarding exceptions. The paper is based on reviews of the IRA form itself, and these documents do not note those who do not need the IRA form.

Agency Obligations. While many IRAs only identify the recipients's family life tasks, some agency IRAs include checklists or open-ended spaces for the agency to note its related activities. In some

instances the agency, like the individual, is obligated to perform the activity; in other situations, the listing may only reflect the intention of, rather than an obligation by, the agency. For the purposes of this paper, we have identified agencies that state they *will* or *shall* undertake certain activities as conveying at least the impression of mutual obligation. Again, we only note such obligations when they are indicated for *family life* activities, not employment-specific activities.

Penalties. The federal law also describes penalties for non-compliance; like the listing of types of obligations, the statutory description of penalties is merely suggestive. This is because the imposition of a personal responsibility agreement is wholly at state option, and also because the state, under the block grant structure, has considerable discretion in determining not only the level and timing of sanctions, but also whether the family at any particular moment may receive any grant whatsoever.

The IRA: Individual Responsibility Agreements and State Requirements of TANF Families identifies sanctions and penalties that are noted within the IRA document itself. In those states in which the IRA itself does not describe any penalties, this paper lists none. This does not mean there are no sanctions associated with failure to meet the terms of the IRA, as penalties may be described in other state documents (e.g., the agency's policy or procedures manuals).

Many IRAs have *boilerplate* language asserting that to receive assistance, the individual must abide by the terms of the IRA but the meaning of that *boilerplate* is not further defined within the IRA document. This paper includes descriptions of specific penalties, not *boilerplate* broad statements. Many of the IRAs also have boilerplate that notes that the agency will recover payments in those instances where the recipient was ineligible because of fraud or information withheld. While this is not reported, instances where the IRA asserts that payments will be recovered from the recipient for other reasons are included (e.g., recoveries of cash assistance payments when activities are not completed by the recipient or family member).

Purpose. States are not required to establish individual responsibility agreements regarding family life issues or employment.

The IRAs are sometimes used as tools to identify family issues and to focus both the client and the agency on barriers to success. It appears that few states have undertaken any analysis of the value of their IRA. As states increasingly utilize IRAs and as the failure to meet the terms of an IRA more frequently becomes the reason for a sanction or termination of the family from assistance the need for such analysis grows.⁵

Scope. Even if a state does not have an IRA, recipients are bound to follow agency rules when they sign an application, including any family life obligations. Thus an IRA may or may not capture all of the state's family life related obligations. For example, Georgia has a pre-natal care requirement for TANF participants that, if not met, could lead to ineligibility; but this requirement is not included in the IRA.

Form. The form of the individual responsibility agreement varies. Some are checklists that a caseworker uses and is signed by a participant; others are open-ended documents that a caseworker writes; still others are merely boilerplate that everyone signs. The following symbols are used in this document to identify the method used in the individual responsibility plan:

- B** means the family life obligation is mentioned as part of the IRA in a *boilerplate* form and not individualized;
- C** means the family life obligation is noted on a *checklist* that could be individualized;
- O** means the family life obligation is *open-ended* and created by the caseworker

The document identifies, for the following topics, the state's provision and the form which it takes (a boilerplate listing, checklist, or open-ended):

Life Skills/Parenting		Child Support	
School	Health Visits	Repay	
Teen Living	Family Planning	Sanctions	
Immunization	DrugAssessment/Treatment	Agency	Other

This Document. This analysis was made possible by the collection of IRAs undertaken in 1997 by staff of the Center on Budget and Policy Priorities. We are particularly grateful to Karen Flores and Lynette Rawlings for collecting the materials from state officials and advocates. The absence of information from a state may mean that no IRA exists, an IRA was in development at the time of contact, or a state advocate or official was unable to provide an IRA. The states listed in the document are states for which there was relevant information within the IRA at the time material was collected. Additional relevant information regarding reproductive health issues also is contained in some states' TANF plans. Readers are encouraged to review CLASP's *State TANF Plans: Out-of-Wedlock Births and Statutory Rape*.[@] Any errors in the attached analysis are made by the author alone.

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SUMMARY OF FAMILY LIFE OBLIGATIONS IN IRAS

CLASP identified 37 states with family life obligations established within the Individual Responsibility Agreements collected from state agencies and advocates in the states. Of the remaining 14 states (including the District of Columbia), six state agencies indicated that they did not have an IRA; four states= forms appear not to include family life obligations; and for three states and the District of Columbia, we did not receive any document.

The following text summarizes IRA information from the 37 states in which it appears a family life obligation may be made of the recipient. Some states= obligations are more explicit on the form than other states. About 30 state IRAs explicitly target family life obligations and appear in the text as well as the chart; the other seven appear to expect a family life obligation (three states expect the counties to establish an IRA, and four states include information about family life obligations within the agency responsibilities and sanction sections).

The CLASP review found that:

The majority of statesC 30C have an IRA which contains some type of explicit family life obligation.

In addition to the 30 states which have an explicit family life obligation defined in the IRA, 3 county-established IRAs (Colorado, Ohio, Maryland) may also mandate family life obligations. Several states have open-ended forms that may also result in family life obligations.

Family life obligations range from life skills/parenting training to family planning to child support cooperation.

The most common family life obligations identified in the 30 states with explicit IRA family life obligations are:

school participation	23 states
child support	20 states
immunization	17 states
health visits	17 states
life skills/parenting	13 states
drug assessment	10 states
family planning	10 states
teen living arrangement	9 states

States= family life obligations include specific health requirements not established elsewhere in TANF.

Many state IRAs include obligations created by TANF (e.g., child support cooperation and minor teen parent school/living arrangement rules); thus, the IRA merely reiterates existing obligations. Congress also offered several health topics otherwise not addressed in TANF: immunization and substance abuse treatment. Seventeen states include an immunization requirement within their IRA, and 10 include a substance abuse treatment requirement. In addition, some states include requirements for health visits (17 states) and/or family planning (10 states).

The Individual Responsibility Agreement is most typically a universal form that lists the obligations of any recipient and is not tailored to the particular recipient or family.

Twenty states utilize a form with boilerplate family life obligations that are expected of all families; 10 states utilize a checklist or open-ended format that allows the caseworker to individualize to some degree the family life obligations; three additional states with open-ended forms are less explicit about incorporating a family life obligation. Finally, three reviewed states pass on to their counties the possibility of family life obligations as part of a county-established individual responsibility agreement.

Half of the states with family life obligations in their IRAs mention some state obligation to TANF recipients within the IRA.

Within the group of 18 states that mention some type of agency responsibility, only a few clearly establish a mutual obligation in which the state must make identified services available. For example, in Missouri, the unavailability of [services negotiated in the plan] will result in the re-negotiating of the Plan; and, in Delaware, the contract specifically states that the participant will take part fully so long as the State gives me the supportive services I need. Some agencies, in articulating limited state obligations, do not similarly limit the obligations of the family. For example, in Idaho, the agency agrees to provide mutually agreed-upon support services that are necessary...[for] this contract to the extent that such services are within resource limits.

SOME FAMILY LIFE IRA ISSUES

Among the IRA issues that need to be considered are:

, Where is the authority for the IRA?

Congress allows states to establish an IRA, but it did not mandate one. State legislatures frame each state's welfare program under the welfare block grant. The IRA may or may not have been part of state legislation. The IRA may not need any legislative imprint, but is the form in keeping with legislative intent? For example, if a state considered but rejected a substance abuse requirement for TANF recipients until the state invested more in treatment programs, does the IRA reflect this decision? How will states with open-ended IRAs ensure that local case managers do not mandate activities the legislature has rejected?

, Is the IRA generating sanctions based on failure to sign a form?

In Tennessee, over 3,500 families lost assistance because they did not sign the state's individual responsibility plan. The Tennessee form includes TANF obligations related to minor teen parents and child support; it also includes three additional obligations: regular school attendance by all children, immunization of children, and well-child health check ups. It is not known why these families did not sign the IRA. It may be that families who need assistance feared they could not meet the obligation without help—the state might be interested in working with such families.

In many—if not most—states with IRAs, it may never be known how many families are sanctioned for failure to sign an IRA. Nothing requires states to collect or report this information; at the same time, nothing precludes a state from tracking whether its IRA is generating sanctions.⁶

, Is the family obligation appropriate?

A family life obligation may be inappropriate if it is required of an individual who has accomplished the activity or does not need the activity. For example, if a state's IRA boilerplate language requires parenting classes of everyone, it could require attendance at parenting classes by a grandmother recently recognized as the state's most outstanding caregiver. Or a state may mandate attendance at family planning counseling sessions, but this might then require grandmothers or those who were voluntarily sterilized to attend a counseling session; failure to attend could result in a sanction (or loss of the grant).

Inappropriate obligations may be easier to avoid with individualized IRAs. Nevertheless, inappropriate obligations could well occur unless the caseworker works closely with the client to understand the needs of the family.

An obligation is also inappropriate if it can not be accomplished. For example, if the participant is mandated to attend a parenting class, but the only available class is late afternoon when the mother does not have child care or transportation, she may not be able to participate.

In Arkansas between January and May 1998, 230 families⁷ lost TANF due to non-compliance with the state's personal responsibility agreement. (During the same period, about 3,020 families lost TANF due to income that exceeded state limits; thus, IRA-caused loss of TANF is equal to about 7% of the loss of TANF due to income.) It is not known how many of the Arkansas IRA case closures are attributable to inappropriate family life obligations.

Is the agency obligation established?

An IRA form is an ideal location to consolidate and list the obligations of the agency. The participant should understand whether the agency has any obligation to provide the mandated services and the support services necessary to participate. In short, is the participant expected to achieve each task whether or not the agency helps in locating the mandated programs and/or helps with essential support services (such as child care and transportation)? States understandably do not want to obligate themselves to provide services beyond available resources; however, if the resources for essential services become unavailable, it is appropriate to reduce the obligations of the family accordingly.

An IRA form should help participants understand family obligations. At the same time, the form itself may cause concern. For example, women who have experienced domestic violence may find statements on the IRA regarding cooperation with paternity establishment too worrisome; consequently, these women might refuse to sign the IRA. It may be that the state has a waiver for domestic violence victims, but unless this is explained along with the IRA, some number of women may not apply because of concerns about safety for themselves and their children. What policy and what steps is the state taking to understand why an individual decides not to sign an IRA?

Is the value of the IRA being assessed? Is the IRA form just another form that gets signed during a too-rushed, information-overloaded session with an eligibility worker? Or is the IRA a useful tool for both the recipient and the caseworker to revisit family life related obligations established in the law as well as other services/programs that might be appropriate to meet the needs of the family? If no assessment has been made of the form's utility, it might help to get the

input of clients and caseworkers on the current system to assess whether to continue or refine the current IRA.

In Tennessee, the University of Memphis found that 34% of those families sanctioned reported that they did not understand what they would have to do to comply with the plan.⁸

STATE-BY-STATE SUMMARY OF FAMILY LIFE OBLIGATIONS IN IRAS

ALABAMA

Family Responsibility Plan
Form: FRP-1-5; 2-97

School Children must be enrolled in school, attending, and encouraged to make satisfactory grades. ' **B**

Teen Living Teen parents must live in an adult-supervised setting and that mandatory clients agree to accept/continue responsibility for all teen parents living in [the] home. [Note: The text refers to teen parents, not *minor* teen parents.] ' **B**

Immunization Children must be immunized. ' **B**

Health Visits Children must have regular health check ups. ' **B**

Repay Clients and other family members must be participating satisfactorily in order to be eligible for the supportive services listed and the client is to repay any supportive services received in error. ' **B**

Other The head of the family is responsible for making sure that other members of the family participate in listed activities.

Alabama has a separate plan for mandatory clients, teen parents, volunteers, and deferred clients. In addition, there is a separate form for clients to sign regarding the release of information contained in their family responsibility plan.

Open-ended sections are available to describe supportive/family services authorized as well as the activities required of other members of the family. ' **O**

ALASKA

Family Self-Sufficiency Plan
Form: ATAP-2; 6/97

Life Skills/ Parenting

Both life skills instruction and parenting skills workshop are on a list of other activities that might be part of steps to achieve self-sufficiency.
' C

Drug Assessment/
Treatment

Substance abuse assessment/treatment are part of other activities within steps needed to achieve self-sufficiency.'
' C

Child Support

Other activities includes six specified items, three of which relate to child support: help CSED [Child Support Enforcement Division] locate absent parent; get a child support order in place; establish paternity.
' C

Agency

The IRA form combines information on work activities, education/training, and other activities. For these three areas, the agency form includes space to identify services needed to accomplish the plan and details who will arrange, who will provide, and who will pay for the service.

Other

In the boilerplate language that establishes the family may lose some or all of its cash assistance and other assistance if the recipients fails to meet obligations, the list of possible obligations notes the following: screening and treatment for substance abuse, planning for and obtaining reliable transportation, and securing stable housing.'
' B

ARIZONA

[no title to form submitted by state]

School

All school-age children are to attend school. ' B

Immunization

Immunizations are to be kept up to date. ' B

Child Support

Cooperate in all respects with Child Support Enforcement. ' B

Sanctions

Penalties will apply if my family or I do not follow this agreement. Month one 25% reduction in cash assistance; Month two 50% reduction. Any additional time my family or I do not follow this

	agreement, DES will stop our Cash Assistance and may stop other supportive services.@ Personal Responsibility Agreement Form: DCO-180; R 7/97
ARKANSAS	
School	Ensure attendance by school age children. ' B
Teen Living	Unmarried minor parents agree to reside in some adult supervised living arrangement unless case worker approves other arrangements.' B
Immunization	Ensure age appropriate immunization. ' B
Child Support	Cooperation with the agency regarding payments and/or establishing paternity. ' B
COLORADO	Individual Responsibility Contract Form: State Sample Available for County Adaptation
Repay	One county, Adams, uses a form which notes that the recipient may be required to reimburse the agency Afor any financial assistance that was received@if activities Aare not completed.@
Other	The state=s sample form is largely open-ended and work-focused. Each county establishes its own contracts/agreements form.
CONNECTICUT	Employability Plan, Part II W-1678; Rev. 12/95
Other	Part II of the state Employability Plan ⁹ provides open-ended space to note Aadditional activities, including those to meet the specific needs of my children, that I <u>may</u> undertake@[emphasis in the original]. ' O
DELAWARE	Contract of Mutual Responsibility Form: 256 New 3/96
Life Skills/ Parenting	The state notes that it will identify service providers Aavailable to clients at no cost@for parenting education. ' C

School	<p>Teens aged 16-18, including teen parents, are to meet school and work participation requirements and the state will set up a plan to assist. ' C</p> <p>For those under age 16, no specific state supports are noted with respect to mandated school attendance. ' C</p>
Immunization	<p>The state notes that it will provide a recommended immunization schedule and pay for immunization through Medicaid. ' C</p>
Family Planning	<p>The state notes that it will identify service providers available to clients at no cost for family planning; the individual is required to obtain family planning information at provider of choice. ' C</p>
Drug Assessment/ Treatment	<p>The state notes that it will identify service providers available to clients at no cost for substance abuse assessment. ' C</p>
Child Support	<p>The state notes that it will help the client to prove paternity, to get a support order, and to collect on and enforce the order. ' C</p>
Sanctions	<p>Each activity (e.g. parenting, family planning) has a distinct set of sanctions. For child support, there are no benefits without cooperation; for parenting education, substance abuse assessment, immunization, and family planning, there is a \$50 reduction in month one, increasing by \$50 each month until compliance. The family planning consequences section also describes the family cap policy under which an additional child is not included in the standard of need for any birth that occurs 10 or more months following the signing of the first Contract of Mutual Responsibility.</p> <p>For the 16-18 year old school/work participation requirement, failure results in removal of the teen's needs in calculating the grant. In addition, if the caretaker of the teen is not cooperating, the grant may be calculated without consideration of those needs.</p>
Agency	<p>The contract specifically states that the participant will take part fully so long as the State gives me the supportive services I need. ' B</p> <p>The mutual contract is a chart of nine components (e.g. child support; family planning) including one open-ended component. Next to each</p>

component are three columns: client responsibility/state supports/consequences. While the *consequences* (sanctions) are spelled out, the *client responsibility* section is not; this suggests that there is some flexibility in the assignment of related activities. The *state supports* column notes the general state obligation, but also includes additional lines that might be filled in with greater specifics.

GEORGIA

Personal Responsibility Plan
Form: Revised 7/97

Life Skills/ Parenting

Attend parent/teacher conferences. ' C
Participate in parenting skills classes. ' C

School

Ensure that minor child(ren) attend school. ' C

Health Visits

Participate in rehabilitation services. ' C
Participate in mental health counseling/treatment. ' C

Family Planning

Attend family planning counseling. ' C

Drug Assessment/
Treatment

Participate in substance abuse counseling/treatment. ' C

Other

Comply with child welfare case plan.' C

HAWAII

Memorandum of Understanding
Form DHS 1242; 5/97

School

Minor teen parents who receive their own welfare checks, will receive assistance only if they stay in school and complete ...high school or equivalency.@ ' B

Sanctions

The MOU also requires the teen parent to acknowledge that Aif I do stay in school, I will still be subject to the 5-year time limit, but my welfare check will not be reduced.@ [In Hawaii, non-exempt able-bodied families are subject to a 20% grant reduction after three months of eligibility.] ' B

Other The MOU, while it addresses the school requirement, is basically a work agreement form rather than a delineation of any family life obligations.

IDAHO Personal Responsibility Contract
Form: HW 06522 ; 4/97

School School-age children are to attend school according to the local school district's standard for attendance. ' B

Immunization Children are to be kept current on immunizations against communicable diseases. ' B

Child Support Cooperation with child support for minor children includes identifying the father, allocating the resident and employment of the other parent and providing other necessary information. ' B

Sanctions Child support cooperation must be complete in order for the family to receive cash assistance; failure to immunize may result in the loss of the family's grant; and if a child does not attend school, the grant will be reduced by \$50 per child per month.

Agency If the agency does not act on a reported change in a timely manner, the family will not be held responsible for errors in the amounts of cash assistance provided. @

The agency agrees to provide mutually agreed upon support services that are necessary...[for] this contract to the extent that such services are within resource limits. @

Other Signatories to the contract include the participant, spouse, other adult living with the family, and any child 16 years of age or older.

ILLINOIS Responsibility and Services Plan
Form: DHS 4003; N-7-97

School Education/Training is noted as one goal area among 10. ' C

Health Visits Health is noted as one goal area among 10. ' C

Agency The Family Investment Agreement, of which Steps to Achieve Self-Sufficiency is a part, establishes its purpose as the identification of the activities to be completed by the family and the resources and supportive services to be provided to the family. @

Among the areas of possible assistance from the agency is family development services. @ ' C

Other The Steps to Achieve Self-Sufficiency form is largely an open-ended form that identifies what needs to be resolved to achieve self-sufficiency @ and time frames for meeting those goals. These might include family life issues. ' O

KENTUCKY

K-TAP Transitional Assistance Agreement

School A teen parent is to set goals for completing school.

Life Skills/ Parenting It is the responsibility the participant to care for her/himself and any child(ren). ' B

Immunization Pre-school child(ren) are to be taken for all required shots. @ ' B

Family Planning A teen parent is to set goals for family size.

Child Support Full cooperation is expected. ' B

Agency The agency lists the activities it agrees to undertake with dates.

LOUISIANA

Individual Responsibility Agreement, Section II
OFS PW 6; 5/97

Life Skills/ Parenting For teen parents: attend parenting classes under the Parenting Skills Training Program. @ ' B

School Keep school age children in school with the objective to improve their educational level through regular school attendance. @ ' B

For teen parents: if not exempt from participation and schooling is not completed, must participate in educational activities, maintain passing grades and maintain a good attendance record at school. @ ' B

Immunization	Take child(ren) for immunizations. ' B
Health Visits	Take child(ren) for scheduled medical appointments. ' B
Drug Assessment/ Treatment	Satisfactorily participate in assigned substance abuse treatment. ' B
Child Support	Assist in establishing paternity and enforcing awards. ' B
Agency	The form explicitly calls for the signature of the case manager to the following statement I will assist you by arranging any needed activities and services and by providing counseling when necessary. @
MAINE	Family Contract for TANF and PaS Families BFI-APP06 R11/97
Life Skills/ Parenting	A plan developed with the case manager must be completed and may include A parenting activities. @ ' B
Health Visits	A plan developed with the case manager must be completed and may include A health care services. You can refuse health care services your religious beliefs forbid it. @ ' B
Child Support	The participant must help in establishing paternity and A getting @ child support. ' B
MARYLAND	Family Responsibility Plan FIA Action Transmittal #97-24 FIA Memo, February 7, 1997
Agency	State guidance establishes that A the plan should also describe the services the State will provide to assist the individual to attain self-sufficiency. @

Other Each local department of social services designs its own family responsibility plan form. Guidance from the state indicates that the plan should specify the requirement to comply with the requests for cooperation, participation in work activities, and supportive services which the local department provides. The customer's actions may include, but are not limited to participating in, child support activities, job search activities, employment activities, community service and substance abuse treatment programs, if appropriate. Thus, some local plans may specify family life requirements while others may not.

MICHIGAN

Personal Responsibility Plan and Family Contract; Section IV&V
Form: FIA 4783; Rev 4-97

Life Skills/ Parenting

For minor teen parents: parenting and life skills classes may be required. ' C

School

For minor teen parents: full time attendance at school is required for those without a diploma or GED. ' C

Immunization

Agree to schedule all child(ren) for immunization appointments.' C

Health Visits

Agree to schedule medical and dental appointments for child(ren). ' C

Child Support

Agree to cooperate fully with the Office of Child Support. ' C

Agency

In the AFIA Responsibilities@section, the agency A agrees to provide a set of services as long as the individual meets program eligibility requirements. FIA agrees to help with child support and a list of supportive services which is also open-ended.

MISSISSIPPI

Personal Responsibility Contract
Form: MDHS-EA-312; Revised 10-01-97

School

ASend the children in my care (ages 6 through 17 years old) to school regularly and encourage their success in school.@' B

Immunization

Obtain recommended immunizations. ' B

Family Planning TANF grants will not increase to reflect babies born or added to the assistance unit 10 months after the individual was originally notified of the family benefit cap, except for good cause. New children must be reported and can be eligible for Medicaid and food stamps. ⁹ **B**

Sanctions TANF is denied for the family if there is a failure to cooperate with the child support agency or a failure to assign rights to the state. ¹⁰ **B**

Failure to immunize child(ren) or to send child(ren) ages 6-12 to school results in grant reduction of 25%; children who fail to attend school will be disqualified from TANF benefits. ¹¹ **B**

Agency The agency establishes a list of its obligations including that it will explain the TANF Work Program requirements and exemptions and that it may provide transitional Medicaid and child care. ¹⁰ **B**

Other The contract specifies that if a child leaves the home, such a change must be reported within 5 days and states that a failure to timely report child leaving means disqualification. ¹¹ **B**

The contract specifies that food stamps will be reduced by 25% or entirely for failure, without good cause, to comply with TANF requirements other than the Work Program. ¹² **B**

The contract is to be signed by the parent/caretaker and second parent.

The Personal Responsibility Contract replaces the Social Contract of AFDC Recipients that had been used in the state's welfare demonstration program. That contract listed certain family life obligations not part of the revised statewide form including that parents would take children up to 18 months old for Medicaid checkups two times a year, and take children between 18 months and six years old for one Medicaid checkup each year.

MISSOURI

Family Self-Sufficiency Pact
Form: MO 886-2628; 8-95

Agency The pact includes the development of a Family Self-Sufficiency Plan under which the Division of Family Services agrees to provide supportive

services that are indicated in the Plan...the unavailability of these services will result in the re-negotiating of the Plan.

Other The Family Self-Sufficiency Plan has six parts. Open-ended sections first establish employment goals and a plan, these are followed by an open-ended section entitled a parent and child development plan. The remaining three parts are: a supportive services, a schedule of contacts, and a agreement.

MONTANA Family Investment Agreement
Form: DPHHS-FA-781; Rev. 8/96

Immunization Immunizations according to the Early and Periodic Screening, Diagnosis and Treatment (EPSDT) schedule must be received by children in the household. ' C

Health Visits Health screenings according to the EPSDT schedule must be received by children in the household. ' C

Child Support Benefits will not be received until all preliminary paperwork is completed; the grant may be sanctioned if at any time there is a failure to respond to a request from the child support enforcement agency. ' C

Sanctions The needs of the individual will be deducted from the grant for each non-compliance with the FIA:

1 st non compliance	one month minimum
2 nd non compliance	three month minimum
3 rd non compliance	six month minimum
4 th & subsequent	twelve month minimum

Agency The Department of Public Health and Human Services will provide services deemed necessary as well as explanations as needed about EPSDT requirements and child support requirements

NEBRASKA Employment First Self-Sufficiency Contract
Form: Attachment C

School	Children age 15 and younger are to be encouraged to regularly attend school. ' B
Health Visits	A Enroll in available health insurance plans, when appropriate.@ A Obtain payment for medical services from a third party, when appropriate.@ ' B
Family Planning	A child born into the family more than 10 months A after the date of the [agency] interview@will not be given incremental assistance added to the grant. ' B Instructions for caseworkers on this provision indicate that the family should be A told what happens to cash assistance, Food Stamps and Medical when a child is born more than 10 months after the initial or the eligibility interview.@
Child Support	Cooperation with child support enforcement can include a A Service plan outlining more actions toward obtaining child support. ' B
Sanctions	Failure to try to encourage school attend could reduce a grant by \$50. Failure to enroll in health insurance when appropriate A will result in termination of ...medical coverage@, and failure to obtain payment from a third party when appropriate A will result in the reduction of my ADC grant and termination of my medical coverage.@ Failure to cooperate with child support will result in the reduction of the A grant and termination of...medical coverage.@ ¹³ ' B
Agency	The Department of Social services A agrees to provide component activities and supportive services detailed in the Employment First Employment Plan, which is a part of this contract.@
Other	The form allows for the signature of two adults.

NEVADA Personal Responsibility Plan
Form: 2024-WA; 10/97

Life Skills/ Parenting	Parenting classes and mentoring programs are two specific items a caseworker may individually check on the form for minor parents; the form for an adult includes a specific item called family responsibilities that could trigger life skills training, among other activities. [A third form for minor children is also used by the state.] ' C
School	School attendance by minor children (ages 7-12) and education by minor parents are two specific items a caseworker may check. ' C
Immunization	Immunization is listed as a specific item a caseworker may check for minors. ' C
Health Visits	Physical and mental health as well as domestic violence issues are specific items a caseworker may check on the form for adults and on the form for minor children; these items are not listed on the form for minor parents. ' C
Drug Assessment/ Treatment	The form for adults and the form for children, but not the form for minor parents, specifically lists substance abuse issues as an item that could be checked. ' C
Sanctions	The Personal Responsibility Plan is separate from the Agreement of Cooperation, which must be also be signed. The PRP notes that in addition to the Cooperation agreement, the individual must comply with the PRP as a condition of eligibility.
Agency	Each form includes an open-ended section in which the agency identifies what it will agree to do.
Other	The specific items listed that the caseworker might individually check are designed to reflect and employability and assessment process; the list is headed employability and assessment results. In addition to the listed items, the adult form invites the caseworker to check off other if appropriate. Each form includes an open-ended section in which the individual identifies what she will agree to as steps to address the identified issues.

Life Skills/ Parenting	The recipient is required to follow the steps established in the personalized plan to address identified individual/family counseling issues. ' O
Health Visits	The individual is required to follow the steps established in the personalized plan to address identified health issues. ' O
Drug Assessment/ Treatment	The individual is required to follow the steps established in the personalized plan to address identified health issues. ' O
Sanctions	Failure to keep appointments and take the established steps may result in a loss of benefits for the individual and her children.
Other	The form is a list of topics with open-ended sections that identify the nature of a set of barriers to employment as well as the activity/service that could address the barrier, the supports needed to participate, and a timetable for each step.

NORTH CAROLINA

Personal Responsibility Contract
Form: DSS-6963; Rev. 7/96

School	School-aged children must attend school according to school policy.' B
	Any teen parents in the family must stay in school.@ ' B
Teen Living	Any teen parents in the family must live at home.@ ' B
Immunization	Children must get their immunizations.@ ' B
Health Visits	Children must have regular medical check ups. ' B
Child Support	Cooperation with child support is required unless good cause. ' B
Sanctions	First failure \$50 grant reduction for 3 months Second \$75 grant reduction for 3 months Third \$75 grant reduction for 6 months

Fourth \$75 grant reduction for 12 months

Agency The agency obligates itself to a set of activities and establishes also that the participant has a right to receive the assistance with services that you can not reasonably provide, and that are necessary...as listed in...the contract.

OHIO Self-Sufficiency Contract (SSC)
OWF Letter No. 2

Sanctions LEAP participants who fail to meet requirements will lose the \$62 monthly incentive for regular school attendance, and the grant will be reduced with termination possible for the participant and child(ren).

Learnfare participants who fail to attend school will be removed from the assistance group's grant. A parent of a Learnfare participant who fails to attend school will have grant reduced.

Failure to cooperate with child support, meet work activities, or other responsibilities will result in:

First time One month off cash assistance and food stamps or until the failure ceases, whichever is longer, for the entire assistance group.

Second time Three months

Third time Six months medical coverage of the adult

Other Counties are required to adopt and use a Self-Sufficiency Contract for every OhioWorks First Assistance Group. When signed by all adult or minor head of household members, the SSC, along with the work plan, becomes a binding agreement. If any member of the assistance group fails to comply with the provision, the entire assistance group is subject to the three-tiered sanctions process. The components of the SSC described above are derived from a model circulated to counties by the state in August 1997.

OKLAHOMA

Mutual Agreement/Employability Plan
Form: DHS, Section 7, Revised 9-1-95

Life Skills/ Parenting

The Family Development and Support Services section of the agreement states: There are family problems which can make it hard for you to get off welfare. Please read the list below and ask for information on as many areas as you want. If there are problems in your family, your social worker can assist you in getting help. In addition to family planning, the list includes requests for information on the following topics: child abuse, disabled children, health screening, school attendance/truancy; AIDS/Sexually Transmitted Diseases; Drug or Alcohol Abuse; Chronic Health Problems; smoking cessation; parenting class; other.

Immunization

Participants can request information from DHS.

Health Visits

Participants can request information from DHS.

Family Planning

The Family Development and Support Services, Section 7 of the agreement, states helping your family help themselves is a part of the purpose of DHS. If you have more children while you are working on your plan for self-sufficiency, you may not be able to meet your goals. Family planning/birth control services are available and include information, counseling services, and medical referrals. The participant is invited to request information on family planning among a list of family issues topics.

Drug Assessment/
Treatment

Participants can request information from DHS.

Child Support

Participants agree to turn in all child support payments and to cooperate.

Agency

The Department of Human Services agrees to provide the necessary services or refer ...to another agency for those services. The instructions to caseworkers indicates that while DHS has the responsibility to provide or refer for services, it is the responsibility of the client to request such services.

PENNSYLVANIA

Agreement of Mutual Responsibility
Form: PA 1661; 2/97

- School Those under age 18 without a high school diploma must attend high school or GED classes and graduate, others are encouraged to return to school. ' **B** Also part of a Activities checklist of 12 times set aside for Caseworker use only.
- Immunization Immunization is included as part of the Activities checklist of 12 items.
- Health Visits Participants are encouraged to keep yourself and your children healthy as an important step to independence, including keeping health appointments during pregnancy and health screenings for children. Participants are advised to ask caseworkers about transportation assistance to get to a doctor or clinic. (Also part of an Activities checklist.) ' **B**
- Drug Assessment/
Treatment If drugs or alcohol prevent the individual from finding or keeping a job, that individual must participate in and complete an available certified substance abuse counseling program. (Also part of an Activities checklist.) ' **B**
- Child Support Child support cooperation is required. (Also part of an Activities checklist.) ' **B**
- Sanctions Failure to cooperate with child support reduces benefits by at least 25%, and benefits for the children will be sent to a protective payee.

Failure to attend school makes removes the individual's share of the grant until the individual returns to school.

Failure to participate in a substance abuse treatment plan if available and if determined to be a barrier to employment removes the individual's share of the grant until the individual cooperates with the treatment plan.
- Agency The agency will provide supportive services to the extent possible.

SOUTH CAROLINA

Individualized Self-Sufficiency Plan

Form: DSS1230 (Dec.95)

Life Skills The ISSP is an open-ended one page document in which a service and provider are noted along side of each objective; prior to the delineation of these objectives is the question are Afamily life skills completed?@

SOUTH DAKOTA

Personal Responsibility Agreement
Form: DOL-TANF-003&004; 6/97

School Participant agrees to ensure that child(ren) attend school Aaccording to school standards.@ ' B
Minor parents agree to attend school. ' B

Teen Living Minor parents agree to live in an adult-supervised arrangement. ' B

Health Visits Participant agrees to Adevelop a plan to help...improve the financial and emotional circumstances@ of the family. ' B

TENNESSEE

Personal Responsibility Plan

School Minor parents agree to stay enrolled and attend school. ' B

Participants agree their children will regularly attend school Aincluding kindergarten.@ ' B

Teen Living Minor parents agree to live in an adult supervised setting. ' B

Immunization Participants agree to make Aensure ...children receive immunization shots.@ ' B

Health Visits Participants agree to make Aensure...children receive health check ups.@ ' B

Child Support Participants agree to send Aall child support to the Department of Human Services.@ ' B

Agency The agency agrees to provide referrals.

TEXAS

Personal Responsibility Agreement
Form: 1073; June, 1996

Life skills/ Parenting

Participants must ensure that each AFDC recipient attend parenting skills classes if requested to do so. ' B

School

Participants must ensure that each child who is younger than 18 or a teen parent younger than 19 attend school regularly unless the child has a diploma or GED. ' B

Health Visits

Participants must ensure that each child gets medical and dental checkups as scheduled through the EPSDT program. ' B

Drug Assessment/
Treatment

Participants must ensure that each parent or relative of a child receiving assistance not use, sell, or possess controlled substances or abuse alcohol. ' B

Child Support

Participants must cooperate with child support. ' B

Agency

Among the agency responsibilities is providing support services to strengthen the family, such as life skills and parenting training. @

UTAH

Family Employment Program Agreement
Form: 842

Agency

The agency agrees to give information and services that may be needed and the participants responsibilities includes understanding that resources will be available to support my plan. These may include...assessment, counseling, and referrals to community agencies. @

VERMONT

Family Development Plan
RU 614; R 3/96

Other

The Family Development Plan is related to the Family Assessment Summary, which considers the head of household as well as other participants in the family. The Plan is a completely open-ended

document identifying steps, tasks, and supports designed to support a goal.

WEST VIRGINIA

Personal Responsibility Contract
IM-WVW-2; New 1/97

Life Skills/ Parenting

The participant will attend counseling, parenting courses, or mentoring if the Family Support Specialist suggests it. ' **B**

Teen parents agree to attend parenting classes or participate in a mentorship program or both. ' **B**

School

Teen parents agree to stay in an educational activity to complete high school, get a GED, or get vocational training and **A**make satisfactory academic progress without getting into trouble.@ ' **B**

Teen Living

Unemancipated minors agree to live an adult-supervised arrangement. ' **B**

Immunization

The participant ensures that the child/ren will **A**get all their required shots.@ ' **B**

Health Visits

The participant agrees **A**with the help of an appropriate health care provider@to develop and keep a schedule to include **A**shots and routine exams@for the children. The participant understands that (s)he may be asked to **A**go to classes that teach..about healthy eating habits.@ ' **B**

Family Planning

The participant agrees to attend family planning classes if the Family Support Specialist suggests it. ' **B**

Child Support

The participant agrees to help collect child support. ' **B**

Other

Open-ended section on challenges and support services needed to overcome challenges.

WISCONSIN

W-2 Participation Agreement
Form: DES-2471; N 3/97

School	Participant agrees to make sure that children go to school. ' B
Teen Living	Minor teen parents agree to live with parent(s) or in an approved home. ' B
Family Planning	Additional children will not increase the grant amount. ' B
Child Support	The participant agrees to cooperate with child support enforcement. ' B
Sanctions	Failure to cooperate with child support three times will result in no cash assistance for six months or until cooperationCwhichever is longer. Failure of children to attend school may cause a benefit reduction.

WYOMING

Individual Responsibility Plan

School	<p>The parent or caretaker agrees to ensure that school-age children (under age 16 or without an 8th grade education) are attending school full time. ' B</p> <p>The teenager who is 16 or older and has completed 8th grade is responsible for attending school full-time and must maintain a AC@ average, and graduate with the Agraduation class.@ He or she must work during summer months unless attending summer school. ' B</p> <p>Minor parents must attend school full-time, maintain a AC@ average, and graduate with the Agraduation class.@ They must work during summer months unless attending summer school. ' B</p>
Teen Living	Unmarried minor parents must live in an adult-supervised setting. ' B
Child Support	The participant agrees to cooperate with child support. ' B

State	TANF Individual Responsibility Agreements: Family Life Requirements							
	Life Skills	School	Teen Living	Immunization	Health Visits	Family Planning	Drug Assessment	Child Support
AK	U						U	U
AL		U	U	U	U			
AR		U	U	U				U
AZ		U		U				U
DE	U	U		U		U	U	U
GA	U	U			U	U	U	
HI		U						
IA						U		
ID		U		U				U
IL		U			U			
IN		U	U	U		U	U	
KY	U	U		U		U		U
LA	U	U		U	U		U	U
ME	U				U			U
MI	U	U		U	U			U

MS		U		U		U		U
MT				U	U			U
NC		U	U	U	U			U
NE		U			U	U		U
NJ	U				U		U	
NV	U	U		U	U		U	
OK	U			U	U	U	U	U
PA		U		U	U		U	U
SC	U							
SD		U	U		U			
TN		U	U	U	U			U
TX	U	U			U		U	U
WI		U	U			U		U
WV	U	U	U	U	U	U		U
WY		U	U					U

A state is not included on this chart when no IRA exists; no family life requirements were explicitly outlined in the existing IRA; an IRA was in development at the time of contact; or a state advocate or official was unable to provide an IRA. Note that the accompanying text contains additional information for the states listed in the chart; in addition, some states that are not on the chart contain family life obligations that are explicitly listed but may be part of sanctions or agency responsibilities sections.

NOTES

1. P.L. 104B93. Sec 408 (b).
2. *Who's Off First: A Look at the Impact of Families First and the Effect of Welfare Reform in Tennessee.* Tennessee Justice Center, 1997.
3. For an examination of the full range of issues associated with individual responsibility plans see *Temporary Assistance for Needy Families: Assessments, Individual Responsibility Plans, and Work Activities* by Wendy Pollack, *Clearinghouse Review*, January-February 1998.
4. CLASP and CBPP are seeking additional information about plans and agreements, including some information about employability plans and the procedures surrounding the development of personal responsibility agreements (e.g., are they developed jointly by the case manager and recipient? Are they developed prior to approval of an application?).

The IRA is limited to a review of family life obligations. While information from employability plans is not reviewed, it is understood that employment-related activities affect family life.

5. A number of state agencies contend that these agreements [regarding employment and family life obligations] encourage participants to think seriously about what they need and to plan for the future, enable the agency to be sure the participant gets all services that will be helpful and assure that the participant has a clear understanding of what the agency will do, and allow for individualization from the outset and modification along the way whenever changes occur. The good news is that some states have developed forms that clearly call for a mutual and individual planning process...These state contrast sharply with many other states that use forms full of boilerplate dictating what the agreement is. *Welfare News*, Welfare Law Center. Sample Personal Responsibility Agreements and Instructions from five states are available from the Welfare Law Center for \$20, 275 Seventh Avenue, Suite 1205, New York, NY 10001-6708.
6. Proposed TANF regulations require states to report on reasons for case closure; however, the sanction category is not disaggregated into reasons for sanction. Thus, any IRA-related sanction would be lumped together with all other sanctions (e.g., failure to meet a work requirement).

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7. Arkansas Status Report on Welfare Reform. June 10, 1998.
 8. ACustomer Service Review.@ Russ Overby. Tennessee Justice Center, June 1998.
 9. The state agency, when asked for its individual responsibility plan documents, submitted the employability material form which includes within it the reference to family life obligations.
 10. Eligible individuals are required to be provided up to one year of transitional Medicaid; states have discretion regarding the provision of transitional child care.
 11. The federal statute addresses minor child absences. It establishes that federal TANF funds are not to be spent in support of minor children who are away from home for a significant period of time. It denies assistance where a child has been or is expected to be Aabsent from the home for a period of 45 consecutive days or, at the option of the State, such period of not less than 30 and not more than 180 consecutive days...@Section 408(a)(10)(A). It also denies assistance for the parent or guardian who fails to notify the state agency of the absence of a child Aby the end of the 5-day period that begins with the date that it becomes clear to the parent (or relative that the minor child will be absent for such period...Section 408(a)(10)C)
 12. Food Stamp law, clarified by a November 19, 1997, U.S. Department of Agriculture memo, establishes that the federal food stamp program can only be denied to an individual (not the family of the individual) who fails to meet a work requirement under certain circumstances.
 13. Medicaid may only be terminated for the individual who failed to cooperateCnot the individual's family.