

SEEKING SAFE HAVEN:

TWO STATES= APPROACHES to the MINOR PARENT TANF LIVING ARRANGEMENT RULE

Jodie Levin-Epstein

March 1999

Center for Law and Social Policy

CLASP

The author wishes to thank all of the state agency officials and others in Vermont and Illinois who contributed time and insights; this publication would not have been possible without their willingness to tell their implementation stories. As always, the author is indebted to colleagues at CLASP for their collective wisdom and good wishes.

8 Copyright 1999, Center for Law and Social Policy. All rights reserved. Any reproduction of the material herein must credit the Center for Law and Social Policy. *Seeking Safe Haven: Two States= Approaches to the Minor Parent TANF Living Arrangement Rule* is available for free on the web at www.clasp.org or for purchase from CLASP Publication.

Seeking Safe Haven: Two States=Approaches to the Minor Parent TANF Living Arrangement Rule was made possible through the support of the Henry J. Kaiser Family Foundation. CLASP's reproductive health work is also supported by the Nathan Cummings Foundation, the Ford Foundation, the Moriah Fund, Inc., the Charles Stewart Mott Foundation, and the Public Welfare Foundation.

Table of Contents

Introduction

The Minor Parent Population.....	1
The Law.....	2
Seeking Safe Haven.....	3
Implementation Issues and Challenges.....	4

Illinois

Illinois= Rules.....	6
State Management of Minor Parents	9
Integration of State Efforts.....	11
The Need for Alternative Living Arrangements	15
Impact.....	15
Evaluation.....	17

Vermont

Vermont= Rules.....	18
State Management of Minor Parents.....	21
Integration of State Efforts.....	23
The Need for Alternative Living Arrangements	25
Impact.....	25
Evaluation.....	27

Endnotes.....	28
---------------	----

INTRODUCTION

The Minor Parent Population

The number of teen mothers (under 20 years old) who receive welfare is a relatively small part of the entire caseload (about 5 percent of the female child recipients) and the number of minor (under 18 years old) teen mothers is even smaller. Currently, there are roughly 200,000 teenage mothers receiving welfare and less than 40,000 of these mothers are minors. This represents a decline in the percent of teenage mothers who are minors from 23% in FY 1994 to 19% in FY 97.

Since minor teen mothers constitute a small proportion of the welfare caseload, they have not traditionally been a priority for policymakers. In recent years, however, interest in minor parents has burgeoned because, as the Department of Health and Human services notes, "historical data suggest that teen mothers 17 and under who give birth outside of marriage are more likely to go on welfare and spend longer on assistance."¹ The immediate fragility of a minor mother family and the likelihood of her long term need for welfare suggests the value of implementing policies and programs that enable the minor mother to provide a stable environment for herself and her child. The relatively small numbers of minors who need such help suggests that such investments may be financially manageable, particularly in today's environment where declining caseloads translate into available welfare funds. However, the policy choices states must make in trying to assist minor parents and their families are complex. In the short term, there are inherent tensions between the goal of assisting minor mothers and the goal of ending dependency on government benefits.

The Law

In 1996, Congress overhauled the nation's welfare system and established Temporary Assistance for Needy Families (TANF).² Congressional revisions to the welfare system required states to address the

challenges minor mothers contend with and create. Under TANF, unmarried, custodial parents younger than age 18 may not receive federal TANF assistance unless they meet two requirements.³ One requirement relates to participation in schooling/training and the other addresses the minor's living arrangement. With respect to the living arrangement requirement, the 1996 federal law generally prohibits an unmarried, minor custodial parent from receiving federally funded TANF benefits, unless she is living with a parent, legal guardian, or other adult relative.⁴ However, a minor parent can be exempted from this living arrangement rule if:

- # the minor has no parent, guardian, or adult relative who is living or whose whereabouts are known;
- # the minor has no parent, guardian, or adult relative who will allow her to live in their home;
- # the state agency determines that the minor or her child is being or has been subjected to serious physical or emotional harm, sexual abuse, or exploitation in the home of the parent or guardian;
- # the state agency determines that living with the parent or guardian presents a risk of imminent or serious harm to the minor or her child; or
- # the state agency otherwise determines that it is in the best interest of the minor's child to waive the rule.⁵

If a minor parent qualifies for one of these five exemptions, the state agency must provide, or assist her in locating, a second chance home or an alternative adult-supervised supportive living arrangement.⁶ Alternatively, the state agency may determine that her current living arrangement is appropriate. A second chance home is defined as one in which teen parents are required to learn parenting skills, budgeting, and other skills that will promote their long-term economic independence and the well-being of their children. The state may provide TANF assistance to an exempt minor, on the condition that she and her child continue to reside in an appropriate living arrangement.

Prior to TANF, some states had recognized the role of minor mothers in welfare utilization and the role of the welfare system in addressing their needs to reduce long term utilization. These states implemented minor parent living arrangements under a state option created by the Family Support Act of 1988, if a state opted for a living arrangement rule, it was required to adhere to a statutory list of exemptions. Some states sought waivers to refine that list or to make other modifications. As policymakers throughout the country wrestle with teen living arrangement rules, they can draw upon the experiences of states which have already experimented with such rules.

Seeking Safe Haven

Seeking Safe Haven explores the policy choices available to states in the implementation of the TANF minor living arrangement rule. It is meant for agency officials who work on this issue, teen parent service providers in the community and others who are interested in how this policy plays out in a state. Every state faces tensions in implementing this rule: how should an agency assess whether a home is a safe haven? How should an agency proceed if a minor has no home? When should an agency sanction or make a minor ineligible because of the living arrangement rule? How can the state best integrate the programs and policies of related agencies (e.g. child welfare/housing) to assist minor parents? **Seeking Safe Haven** tells the story of how two states have addressed and are continuing to refine policies related to teen parent living arrangements. *Illinois and Vermont were chosen because they address the inherent tensions in such policies. Both Vermont and Illinois have explicit policies that seek to protect those minor mothers for whom a mandate to *Alive at home* is problematic.* The intention of these policies is to avoid possible harm from the living arrangement rule. Of equal interest is whether - and how -- these states have been able to engage in promoting healthy alternatives.

There are additional reasons for the selection of Illinois and Vermont including:

- # Both states began implementation prior to 1996 and therefore have more implementation experience than most other states;
- # Both states track and report data on aspects of the rule; in contrast, some other states do not collect basic information and many collect, but do not report information about their minor parent population and the living arrangement rule;
- # Both states have established living arrangement guidance materials;
- # Little has been told about these states= implementation stories;⁶ and
- # The states differ in geographic size as well as in the size of their minor parent population.

We hope that **Seeking Safe Haven** helps other states and those who work with minor parents as they seek to develop policies that balance the varying needs of minor parents. We also encourage readers to visit our web site or call CLASP publications for other CLASP resources on the TANF minor parent living arrangement rule.

Implementation Issues and Challenges

Seeking Safe Haven identifies some key implementation issues related to the living arrangement rule including:

- # *Living arrangement policies are intertwined with other welfare system goals* for minor teen parents. For example, school attendance and job-readiness are affected if the state mandates the teen move to a location some distance from where a student is currently enrolled. Alternatively, if the living arrangement rule causes the minor to be ineligible for TANF, the state loses the opportunity through TANF to mandate school/job training participation.
- # *Living arrangement policies affect other social system programs.* For example, the living arrangement rules can influence youth homelessness - either by decreasing or increasing the need for shelter. Similarly, the TANF minor teen living arrangement rule could increase or decrease demands on the foster care system. The living arrangement policy could also serve as the impetus for greater interaction and collaboration between TANF and other social service systems. For example, TANF could pay the child welfare system to help provide shelter or services to a minor parent who is not a ward of the state. The two agencies could then work together to prevent abuse and neglect of the minor parent or her child.
- # *Living arrangement policies can seek or shy away from including more minor teens.* A state can use the living arrangement rule to eliminate minor teens from TANF participation or can use it to embrace as many minor teens as possible. Restrictive policies or implementation could reduce dependency and save the state funds in the short run if those policies lead to TANF caseload reduction; more flexible rules could reduce dependency and save the state funds over the long-term if the policies lead to improved social outcomes for the minor parent and/or her child.
- # *Living arrangement policies and income deeming rules combine to determine the scope of participation by teen parents.* For example, a state might decide to consider a minor parent to have access to her parent's income if they live together. Such deeming would reduce the number of teen families eligible for TANF assistance. A state that wants to ensure as many teens as possible are subject to the school requirements and case management available through TANF could decide not to deem the adult's income or deem less of it.
- # *Living arrangement policies set by the state may not be implemented locally without adequate training on the rules.* For example, when a state uses a label like

the *live at home* rule, the staff at the local level may implement the rule based on the *short-hand* language of the label and not pay adequate attention to the state's list of standard exemptions or local discretion for exemptions. Not only should state and local agency staff be familiar with the living arrangement rules but teen parent service providers and teens themselves also need to be aware of the provisions.

- # *Living arrangement policies that expect agency staff to help locate alternative living arrangements are viable only to the extent alternatives are available.* For example, if an assessment reveals that the minor has no appropriate relative or guardian and should be living with adult supervision, the lack of a *second chance* home or other appropriate setting limits the options and avenues of assistance. The agency may have rules that allow the minor parent to be TANF eligible under these circumstances; at the same time, the agency is aware that this is less than what is needed for the minor and her child to thrive.

- # *Living arrangement policies should be tracked so that appropriate operational and policy changes can be made.* For example, it is useful for the agency to understand whether local lease agreements are creating the impetus for minors leaving their families. This could lead the agency to work for lease changes or lead to an exemption criteria.

Most minors who are mothers live with family members. Some minor mothers leave their parents or relatives home because living together is unhealthy. The impetus for the separation could be abuse or neglect or it could be due to housing overcrowding or other unhealthy situations. When a minor mother seeks help but is not living with a relative or guardian, the welfare agency is expected to determine the healthiest living arrangement: a *return* to a family member, a *second chance* home (if one is available) or approval to live independently. The state's decision could lead to a better living arrangement, one that is harmful, or could mean the minor mother and her infant become ineligible for subsistence (TANF). The decisions a state makes are fraught with challenges. We hope the following detailed description of Illinois and Vermont's approaches to these issues will assist states and advocates as they struggle with the complexities inherent in living arrangement provisions.

ILLINOIS

State Overview. Illinois has the 5th highest number⁷ of minor teen mothers [TANF and non-TANF] in the nation. The state has operated a minor living arrangement rule since September 1, 1995⁸ that is similar to the federal 1988 Family Support Act [FSA] provision. The Illinois policy expands upon the FSA exemptions to the living arrangement requirement. The state's policies are designed to protect minor teens who should not be subject to the rule. It is not clear, however, whether the state's policy is always known or communicated at the local level. For example, some advocates are concerned that teens, particularly those who the state intends to exempt, may need local staff to provide verbal explanations of the exemptions (in addition to the transmittal of the policy on paper that is most likely provided). The rule appears to have focused attention on the need for alternative living arrangements for some minor mothers but as yet it does not appear that the state has invested significant state dollars to provide stable alternatives. In working with TANF teen parents, Illinois utilizes Teen Parent Services -- specialized case managers. These case managers are not responsible for determining TANF eligibility or living arrangements but they are vitally aware of the housing needs of some of the TANF minor parents. As Denise Simon notes, "If living with a responsible adult is not an option, reliable, affordable, and safe housing for young parents is critical in order that they can attend school and concentrate on making healthy decisions for themselves and their families."⁹

ILLINOIS= RULES

Tiers. The Illinois living arrangement rule differs from the TANF requirement. Under TANF, the decision regarding where a minor parent lives falls into 3 tiers: first, she is required to live with a parent, adult relative, or guardian; second, an exception to this requirement may be made that allows the teen parent to live in other types of adult supervised arrangements [e.g a second chance home]; third, the state may determine that it is "in the best interest" of the minor child to entirely waive the requirement and may allow the minor teen to live independently. Under Illinois= rules, there are two tiers. The first tier combines all the types of adult supervision [defined in Illinois as someone 18 or older]; the second tier is state approval of an independent living arrangement.

Illinois= combined tiers means the welfare agency views all types of adult supervision equally; indeed, Illinois= rules establish that the minor's choice among alternative adult supervised living arrangements is to be accepted. Welfare agency guidance explains,

"For example, the minor parent may live with the minor's 20 year old sister or the minor's parent or in any other living arrangement that meets the live at home criteria. The minor parent does not need to explain this choice."⁹

Exceptions. The Illinois rule also differs from federal TANF in that the state has a broader list of defined exemptions than the federal rule. In addition to the exceptions noted in TANF, the Illinois rule exempts minor parents and pregnant minors¹⁰ who:

- ' have ever been married;
- ' have lived apart from a parent or guardian for at least one year before the child's birth or before application for welfare;
- ' would violate a lease or local health or safety standard if returned to the home of a parent or guardian;
- ' have been placed in Independent Living by the Department of Children and Family Services;
- ' have enrolled in a licensed substance abuse treatment program which would not be available if returned to the home of a parent or guardian.

The exemptions apply to the combined tier; thus, the minor mother is exempt from living with parents/relatives/guardian is also exempt from living in other adult supervised settings if she can demonstrate she meets an exemption criterion.

Assessment. The current living arrangement is established through verification materials¹¹ provided by the minor teen, or on behalf of the minor, to the welfare office. There is no visit made to assess the living arrangement.

Deeming. State guidance clarifies that if a minor parent returns home then the minor must be included in the same assistance unit as her siblings if there are siblings already receiving TANF.¹²

When the minor mother lives in the same household as her parent (the grandparent), the grandparent's income is deemed available to the minor mother. If the grandparent receives TANF, the minor mother is included in the grandparent's assistance unit.¹³ If the grandparent is not receiving TANF, her income is still deemed available to the minor mother. In practical terms, Illinois measures the grandparent's income (minus certain deductions) against the federal poverty level for the grandparent and her dependents. The difference is deemed available to the minor mother. This means that in Illinois a minor mother who lives with her own mother and two siblings cannot receive full TANF assistance if the grandmother has an annual income above \$13,400 (after allowable deductions).¹⁴

Representative Payee. When a minor mother is exempt for the living arrangement rule she receives a grant in her own name; if she is not exempt and lives with a responsible adult that adult becomes a

A representative payee unless the adult is already in a TANF household. The grant check is to be sent to a representative payee - the adult (non-parent) with whom the minor parent lives - unless:¹⁵

- ' the minor parent turns 18
- ' the adult does not agree to receive payment
- ' the adult misuses payment¹⁶

According to some Chicago welfare office caseworkers, virtually all minor parents who do not reside with a parent arrive at the welfare office having identified some adult as their representative payee.

Deeming is treated differently when the minor parent lives with adult relatives rather than with a parent. While a parent's (the infant's grandparent) income is deemed, that of an adult relative is not. This means that some minor parents who might be ineligible because of grandparent deeming can still receive TANF assistance B if they leave the parental home and are otherwise eligible; it also may mean that for some minor parents the act of leaving the parental home [for the home of an aunt or other adult relative] results in a larger TANF grant for the minor and her baby. Some local welfare offices believe that the minors identify an adult relative ARPT because the grant amounts are greater through this arrangement than by living at home. Thus, the policy may have an unintended consequence of A pushing out a minor teen from her nuclear family.

Heads of household. Under federal TANF, the 60 month lifetime limit on federal assistance ticks on teen parents, including minors, who are heads of household. In Illinois, state funds are used to assist those minor parents who are heads of household participating in the program; thus, the federal clock does not tick in this instance.

State guidance establishes the limited situations in which a minor parent, living with her own parent, can be her own separate family unit:

AMinor parents can receive TANF as a separate family unit and in those situations are considered adults; they can be living with their siblings and or parents who are receiving TANF. To get a separate family unit the minor must either have been married or the minor mother, legal father of the child and the child live together.@¹⁷

A number of TPS staff report that there have been situations in which a minor parent is raising not only her child, but also younger siblings.

Locating Alternatives. Illinois rules do not obligate the state to help a minor teen mother secure an alternative living arrangement; however, in practice such assistance may be given by staff in local offices.

TANF establishes that the state has an obligation to assist but does not define what that means.

Transition. Illinois rules do not provide for cash assistance to be provided to a minor teen who is not living in an approved setting but plans to transition into one.

TANF Disqualification. Failure to meet the living arrangement requirement results in disqualification for TANF for the minor teen and her child(ren) in her care. Disqualification is grounds for immediate referral to child protective services.

Appeals. Appeals of a state decision on the living arrangement for a minor mother are part of the standard appeals procedure. Minors who wish to contest a decision can file an appeal by filing out a form in their local office or by calling a central phone number.

STATE MANAGEMENT OF MINOR PARENTS

The state case manages its TANF teen parents through a special Teen Parent Services program. TPS works with all TANF young parents under age 21 who do not yet have their high school diploma or GED certificate. TPS is administered and operated by the Illinois welfare agency [Department of Human Services] but TPS is not involved with income maintenance functions. TPS providers include local welfare offices as well as local social service, education, and health agencies with a teen parent component. The services offered by TPS include comprehensive case management, skills assessment, pre-natal classes, and payments for transportation to school and other related expenses. Regarding the living arrangement rule, the TPS staff might be asked by the local welfare office to assist in the verification of the current living arrangement.

Information Dissemination: Agency Staff. A key issue in implementation of the living arrangement rule is how and what TPS and TANF staff learn about it. Most state information on the living arrangement rule has been transmitted through comprehensive information memorandum and other state guidance. However, while some training on the living arrangement rule occurred when it was first implemented in September, 1995, it has not been a focus of significant subsequent training (all new staff get trained on the full range of issues with which they will be responsible, including the living arrangement rule when appropriate). When TANF was enacted, the state undertook training on the new law and its provisions. The existing living arrangement rule was included in this training along with a list of other issues. For all states, the magnitude of change under TANF and under state waivers has been significant; in addition, like a number of other states, Illinois has undergone a major reorganization. In the context of all of these institutional and policy changes, the minor parent living arrangement rule - which affects a relatively few welfare participants - vies with more significant issues for staff time and resources. In Illinois, while TANF-related training included only a brief amount of time devoted to the living arrangement topic, the state did undertake a special training targeted directly at Chicago-area teens and school professionals regarding all the TANF requirements for teen parents [school,

living arrangement, child support].

Information Dissemination: Local Teen Parent Service Providers. Numerous adults come into contact with minor parents besides those employed to administer the rule; their knowledge of the rule can effect its implementation and how minor teens fare. In Illinois, the Ounce of Prevention Fund administers a network of Parents Too Soon providers who offer services to teen parents through non-profit, community based organizations. Their services for teen parents range from home visiting to enhancing parenting to support groups. A majority of the Parents Too Soon teen participants either receive or are eligible to receive TANF. The Ounce, in mid-1998, surveyed its sites to get a better sense of how the living arrangement requirement of Illinois TANF program is understood by Ounce site directors or appropriate staff.¹⁸ Regarding the rule, the findings of the informal survey indicate that among the 19 respondents:

- \$ about 1 in 5 report no knowledge of the living arrangement rule; and
- \$ about 4 in 5 express knowledge of the rule derived frequently from training by the welfare agency or Ounce of Prevention staff; roughly 20% report having read the state regulations.

Since knowledge of the exceptions provision is central to ensuring that those minor parents in abusive environments can receive TANF without returning to that environment, a key question is service provider familiarity with allowable alternatives to living with parents, relatives, and legal guardians. While state policy establishes that a minor parent in this situation should be exempt, the teen might not seek assistance if she believes she will be required to stay in an abusive environment. A knowledgeable service provider could help her understand her options and eliminate her worries about applying for assistance. The survey found that:

- \$ about 1 in 3 *inaccurately* report that minor parents are not allowed to be in living arrangements other than those with parents, relatives and legal guardians.

Asked their perception of others' knowledge of the living arrangement rule, the respondents:

- \$ rated Teen Parent Service caseworkers as more knowledgeable than welfare caseworkers
- \$ rated most teen parents as unfamiliar with the rules (11 of 15 respondents indicated teen knowledge at 5 or lower on a scale in which 10 indicates the highest level of knowledge; the respondents were not distinguished between those who are subject to the rule and need to know it and those who are not subject to the rule).

The survey suggests a mixed picture regarding knowledge of the rule. Of particular concern is the finding that as many as 1/3 of the service providers do not understand that the state has the ability to approve TANF assistance for minor parents who live in alternative living arrangements or who live independently with state approval.

INTEGRATION OF STATE EFFORTS

State Child Welfare Agency. According to the state's TANF plan, teen mothers who are wards of the state and enrolled in the child welfare agency's Independent Living Program may qualify for TANF.¹⁹ However, the State of Illinois has adopted policies to support teen mothers who are wards of the state through its own program, rather than have them funded through TANF.

The Independent Living Program is designed to provide young wards of the state a period of transition in which they learn the skills of living independently. These young people leave foster care homes and take up residence on their own or in shared apartments in the community.

Of the almost 1300 teen and young mothers through age 20 who are wards of the state, about 33% are in Independent Living.²⁰ The Independent Living Program is available to teen mothers ages 18 to 21; minors rarely are allowed into the program and only if their individual case plan calls for such a step.

A teen mother who participates in the Independent Living Program receives \$102 to support each child. In addition, she receives support for rent and allowance. All of this support comes from the child welfare agency and not TANF.

According to Mary Sue Morsch, a deputy director at the Illinois Department of Children and Family Services (IDCFS), "We explored whether we should seek TANF support for children of our teen wards. We decided everyone would be better off if we kept both the ward and her infant out of the TANF system as long as possible, so that, ideally, we would not have to utilize TANF benefits long term."

Frances Elbert, Teen Parent Coordinator for the Department of Children and Family Services, believes there is a role for the child welfare agency in the implementation of the TANF living arrangement rule.

She notes, "While I have been a coordinator, I have been engaged in discussions with the Illinois Department of Human Services (IDHS) which administers the TANF program about a possible role in assessing the living arrangements of non-wards. We have the expertise and could develop an assessment instrument that identifies barriers to family living. A concrete step to make this process feasible would be for IDHS to provide a transitional TANF assistance grant while the child welfare agency worked on family barriers and worked towards reunification."

In recent years, the IDCFS has shifted the focus from transitioning wards to public welfare to ensuring they obtain the education and vocational skills necessary to support their families independently. Elbert is concerned that those teen mothers, who will need TANF when they age out of the IDCFS system, may

not be as prepared for the work requirements as they should be.

“We should be working together to make those systems jibe,” Elbert said. “This includes ensuring that a young mother who is no longer a ward of the state can have seamless access to cash assistance if she needs it. That can come in the form of savings accumulated, community based support systems, and linkages to non-TANF benefits. For those who need to access TANF, a model may exist for addressing delays in benefits.”

“Currently IDCFS has an agreement with IDHS to expedite TANF participation for families who are in the process of reunification. The goal is to ensure the financial support is there when the families are reunited and dealing with the stress inherent during this immediate period,” Elbert said.

“We plan to explore the same sort of expedited process for very young mothers who need continued support after they are emancipated from the child welfare system. The expedited TANF would just make this crucial transition period less financially stressful and reduce the risk of homelessness.”

Morsch points to another possible area of interagency cooperation. She notes that IDCFS employs housing advocacy providers who help families find needed housing. These providers have the expertise to assist families outside of the child welfare system as well. “In extending this service, however, the agency would need to develop expertise regarding rental agreements for unemancipated minors.”

Youth Homeless Programs. In April 1998, the state awarded \$1 million in expanded state funds to homeless youth programs around the state.²¹ By FY 1999, the state expects to spend \$4 million towards assisting some of the estimated 25,000 homeless youth (ages 14-21) in Illinois.²² In describing the Homeless Youth Program, the Department of Human Services notes that the target group of 14-21 year olds who “cannot return home and lack housing and skills to live independently ...often includes pregnant or parenting teens.” The number may be significant - a study in 1980 found that of the homeless youth (age 20 and under), fully 18% were minors who were pregnant or parenting.²³

A 1994 report by the Chicago Coalition for the Homeless, “Alone After Dark: A Study of Homeless Youth in Chicago” found that the home environment was often untenable. As described by the Coalition²⁴, among the findings are that:

- \$ 75% of youth had been hit or beaten by those who raised them;
- \$ 1/6 reported having been sexually assaulted by those who raised them;
- \$ Almost 50% reported that they lived with a person with an alcohol problem.

Pregnant and parenting minors who are homeless are perhaps the most fragile teenage parents. TANF assistance could help these teens get on their feet. A number of shelter providers, however, report anecdotes indicating that barriers to TANF by homeless minor parents may not be unusual.

Renee Knight of The Children's Home and Aid Society oversees a housing service for youth without shelter that is funded through the state's Youth Homeless Program. Of the 150-200 homeless youth (through age 21) served annually, about 65% are under age 18 and about 40% are pregnant or parenting.

It's tough being homeless and a teen mother but the minor mothers who can't go back home face an added barrier in accessing TANF. Our understanding is that to apply for TANF you need an address.²⁵ We've been successful with our older teen parents in brokering apartments and in getting these teens into TANF but landlords won't rent to minors. That means, we can't get the minors an address. TANF could help some minors avoid entering the foster care system. A number of these young mothers have family or friends who are willing to take on the emotional burden of sheltering them and their children but who are unable to take on the financial burden. TANF could make the difference in these situations.@

Knight notes that she has been able to work collaboratively with local welfare offices when minor mothers live in difficult circumstances at home. Recently, two young mothers, both of whom lived with problem parents, went to their local welfare offices to get a welfare grant. They were initially told they could not get their own grant. We were able to help each teen mother document the home problems and this enabled the aid office to approve a grant in the teen mother's name. The collaboration worked well and the welfare agency welcomed the chance to help these minor mothers. We are concerned, however, about the minor mothers who don't come to us for advocacy but are these minor mothers staying in abusive homes? No one wants that.@

Fran Middleton of MELD in Rockford, a network of area shelter services, estimates that about 80% of the homeless minor mothers that come into contact with her program are unable to find alternatives and return to unsatisfactory home environments. In addition, Middleton reports there has been a horrendous increase in the number of minor parents entering our emergency shelter system. In the last ten years we have jumped from two to three minors each year to 45 this last year. This represents over 35% of the total youth served. By licensure standard, the longest that a family can stay in the emergency shelter system is 21 days with up to 120 day extensions for the most serious cases. Those who meet the total 141 days are generally the minors.@

Many, but not all, of MELD's minor parents are from families receiving TANF. Implementation of the TANF minor living arrangement rule does not seem, to Middleton, to adequately appreciate the dreadful living arrangements these minors have left. The welfare agency doesn't investigate what is going on in the home nor how TANF funds are being used. The minor could be exempt if she reported the abuse to the child welfare agency but sometimes the teen mother is not equipped to do that. For lack of resources or alternative living arrangements, many of our minors are forced to go back home.@

Middleton thinks more should be done to assess the living arrangements and expenditures of teen parents; she can't forget the image of one abused young mother who pleaded "Fran, can't you help me get out?"

Regarding the role of the TANF living arrangement rule, Middleton notes "I'm not enthusiastic about giving a TANF grant to a minor parent who might not spend her monies wisely but I am also troubled by the assumption that she's better off living with an adult. It depends upon the adult. I think it would help if TANF funds could be used by an intermediary to help pay for housing for those teens who have no where else to go. Minors are not legally able to rent so the intermediary could be the tenant of record and also could handle the financial transactions. The young woman would need case management services to assist her with her daily living and parenting responsibilities."⁶

While MELD could seek to be a representative payee for individual minor mothers who need TANF and have no other adult support, such an arrangement would be highly problematic for several reasons. Middleton notes that, "for MELD to become a rep payee for a very young homeless mother would generate costs and potential liability issues not covered through TANF; more importantly, since a young mother is with us for a very short time, we would have to terminate the rep payee arrangement as she left. While it would be helpful to be able to access TANF grants, there are real implementation barriers to the rep payee idea. In contrast, establishing a project for an institution to serve as an intermediary for housing needs might prove more feasible."

"Part of what explains the presence of homeless minor mothers," Middleton surmises, "is a child welfare

Pregnant Cici Seeks Home

Cici is a 15 years old and pregnant with her first child. Cici's parents were divorced when she was just 1 year old. Her mother was given custody of her and an older sister but they were raised by Cici's father until Cici turned 12. At that time, Cici's mother returned and decided she wanted Cici and her sister to live with her. Cici and her sister (who is now 16) have been with her mother since then, moving from place to place very 3-4 months. Cici's mother is a heavy drug user, as is her common-law husband. Cici's mother receives TANF benefits for Cici and her sister. Cici reports her sister has basically raised her and that neither of the parents are very supportive. Two months ago, Cici's mother found out about Cici's pregnancy, became angry and threw Cici and her sister out of the house. Cici and her sister went to stay with a friend but she and Cici got into a fight and Cici ended up here in the homeless shelter. Because of her age and the fact that she has no one over age 18 who could be in charge of her benefits (as an alternative to her mother if her mother agreed to such a shift) we had no choice other than to try reunifying the family. Cici's mom was not going to be willing to give up her benefits, so she came to the shelter for a session with our staff counselor. She reported giving up drugs, but had alcohol on her breath. Cici saw right through her mom's facade. She decided she would not raise her baby in her mom's drug abusing household. Since she felt this was the only place she'd be allowed to go, she ran away from the shelter and her current whereabouts are unknown. In some states, teen mothers are emancipated once they give birth. A 15 year old is too young to support herself, but someone other than a drug user, even if that drug user is your mom, should be made able to advocate and care for the young moms who so desperately need it!

MELD staffer report on Cici's story, 1998.

agency that appears to shy away from troubled teen mothers. Some get into the system but it seems to me the agency which is supposed to take in neglected/abused children becomes reluctant at the prospect when it involves a teen mother and her child. It costs the agency two, not just one foster care slot. It's an expensive proposition and it consumes resources that are already limited.@

Middleton explains that MELD is able to help some minors by developing a community based service plan for the minor mother and her child and sometimes other family members. MELD coordinates services to help her stay in school and care for her child. The 17 year old minors in MELD living in MELD's transitional living program live independently on the third floor of the homeless shelter. Middleton views this as not entirely satisfactory and asserts, "What we need is a group home for minor teen families, not an apartment model which perpetuates their isolation and for the 15-17 year olds this would provide a resource where there is nothing available.@

THE NEED FOR ALTERNATIVE LIVING ARRANGEMENTS

While no formal state analysis has assessed how many minor teens might be in need of some type of alternative living arrangement (such as a second chance home), informal conversations with some TPS staff and local Chicago welfare agency staff indicate that such alternative housing is needed by some young mothers within their caseload.

The Ounce of Prevention Fund/Kids PEPP surveyed its network of local program staff asking "Are you concerned that any of your participants are in living arrangements that may be unsafe or unhealthy? Are you concerned about crowding? Violence?" Of the 17 respondents, 12 (nearly 86%) said that they were worried about current living arrangements. When asked about whether the state should invest in "second chance" homes, 100% of the respondents thought such an investment should be made.

IMPACT

Assistance Denied. State data indicate that nearly 50 minor mothers were denied access to cash assistance in the month of May, 1998 due to the living arrangement rule. Not documented by the department but of concern to the Poverty Law Project are teens who decide not to apply because they are discouraged from applying - consequently, they do not show up in any data on application denials.²⁷ State policy guidance seeks to ensure that those denied TANF due to the minor teen living arrangement rule are processed properly by welfare workers for Medicaid eligibility.²⁸ Thus, the coding for Medicaid provides a relatively clear number of the minor teens denied TANF because of where they live. However, the number may actually be larger since the Medicaid coding appears to only include those cases in which the welfare office actually changed the existing TANF status of the individual. It may not include those who are TANF applicants. While the state may intend to ensure Medicaid participation by those eligible for it, this policy may not be reflected by the procedures in some welfare offices. As noted in a recent *Illinois Welfare*

*News.*²⁹

Caseworkers fail to inform minor applicants or would-be applicants that they may receive Medicaid for themselves (and their children) even if they are not living with an adult caretaker relative. Teens who are told that they are ineligible for cash benefits because they do not live with an adult are not offered the opportunity to apply for or receive Medicaid. This problem has been reported at a variety of local offices in the Chicago areas, including Western, Englewood, and Garfield local offices.²⁹

The question of whether, or to what extent, minor mothers are not seeking TANF assistance due to the living arrangement rule or teens' perceptions of it cannot be answered. Chicago area welfare workers report that they believe the rule is so flexible that few minor teens have any reason to be concerned that the rule will force them to live in an untenable environment. However, if a minor mother believes (or local agency staff tell her, contrary to clear state policy) she must live-at-home²⁹ and the minor finds her home environment unacceptable she might not apply. There is no source of information and no research investigating this question.

Supports for Non-TANF Teens. Access to TPS (Teen Parent Services) is limited to those teens in TANF; thus minor teens denied TANF due to the living arrangement provision do not have access to TPS case management supports.

Has the Rule Caused Any Changes in Living Arrangements? With respect to minor parents who head households, the state has reported data that allows a comparison of living arrangements between October, 1996 and March, 1998;³⁰ over this time period the total number of such teens dropped from 615 to 409. State and national TANF caseloads have also declined dramatically during this period.³¹

For both periods, most minor parent heads of household were living with a parent, adult relative or legal guardian and the percentage of each type of living arrangement remained roughly similar:

Living Arrangements of Minor Parents

	October, 1996	March, 1998
living with parent, adult relative, guardian	237 (38.%)	170 (41.4%)
lived apart from parents at least 1 year	16 (2.6%)	16 (3.9%)
living in an adult supervised home	124 (20.2%)	58 (14.1%)
parent/guardian deceased or whereabouts unknown	27 (4.4%)	19 (4.5%)
parent/guardian will not accept them	133 (21.6%)	93 (22.6%)
parent/guardian dangerous	22 (3.6%)	16 (3.9%)
good cause criteria met	56 (9.1%)	39 (9.5%)

A different question is whether there is an increase in the proportion of minor mothers (not heads of household) who reside with a parent, relative, or guardian. The answer to this question is not readily answered from available state data.

EVALUATION

The state reports that no evaluation of the minor parent living arrangement rule is planned at this time.³²

VERMONT

State Overview. Vermont adopted the Family Support Act minor teen living requirement in 1994.³³ Living arrangement assessment and placement is the responsibility of a network of community based organizations, Parent-Child Centers (PCC), under contract with the state. While Vermont is a small state with relatively few TANF minor parents -- 112 in 1995³⁴ B it has made a number of significant policy choices that could inform other states. For example, states decide whether and how much a grandparent's income is deemed available to a teen mother. The more income from a grandparent that is deemed available to the minor, the less likely she is to be eligible for TANF. Vermont decided to totally exclude the income of the grandparent in calculating a grant for a minor teen. The state's decision is designed to increase the likelihood that a minor mother will be able to stay with her family.³⁵ State welfare agencies also decide how much to integrate with the child welfare agency regarding the living arrangement rule. In Vermont, the welfare agency and the child welfare agency are putting in place a new cooperative policy. The goal is a straightforward. A TANF minor mother in a situation of particular need could be placed with specialized foster care parents, but the minor and her child would remain outside of the foster care system.

VERMONT'S RULES

Accepted Supervised Arrangements. The Vermont rule differs from TANF. The state accepts a pregnant minor or minor mother's living arrangement if she lives in any of these arrangements:

- # with a parent or legal guardian
- # with a relative at least 25 years of age
- # in a group home for pregnant and parenting teenagers
- # in a licensed foster home
- # in an approved congregate housing (with an adult residing in one of the living units)

In contrast, under TANF, a minor parent is expected to live with a parent, adult relative or guardian; TANF allows exemptions to these three categories but agency approval of each individual situation is required.

Criteria for Independent Arrangements. Vermont's policy and TANF's provisions both allow a minor to live independently if approved to do so. While TANF does not spell out the criteria that should trigger state approval, Vermont sets forth the following criteria:

- # a 17 year old minor parent has lived apart from a parent, legal guardian, or adult relative for at least 6 months and has been self-supporting during this period since the birth of a child or since application for TANF;
- # a minor parent resides with the other parent and both are age 16 or older;
- # the minor parent has been emancipated by a court order; or
- # the welfare agency operations chief or designee determines that no appropriate living arrangement is available.

An individual is not considered a minor - even if under age 18 - if she has married.

Procedures for Exploring Alternative Arrangements. The procedures for determining the living arrangement are straightforward. If the minor is not living in one of the acceptable arrangements and not exempt, the case manager and minor parent shall jointly determine whether one is available and appropriate, and exploration of the parental/guardian home is given priority consideration. However, if either the case manager or the minor disagrees about the appropriateness of the home, they are to explore other alternatives and the minor mother is not required to explain the reasons for rejecting her parental home. In addition, if the minor mother who is participating in a substance abuse or vocational education program that would no longer be available to her if she returned to the parent/guardian, the case manager shall help her find an alternative.

When the case manager and the minor can not agree on any of the alternatives above, the following living arrangements may be considered:

- # approved transitional housing
- # with a non-relative at least 25 years of age who, in the judgement of the case manager, can act in a parental role in relationship to the minor parent

If the case manager and the minor can still not agree, the case is reviewed by the welfare agency operations chief or designee. If the agency official determines that the minor is not exempt, the minor is subject to sanction.

Assessment. Vermont has established guidance, *Assessing Living Arrangements* which details the steps that are to be taken in reviewing different options for the minor parent's living arrangement. A complimentary guide, *Characteristics of Supervising Adults* distinguishes the characteristics associated with the most and least supportive adults.

Deeming. Vermont does not include grandparents' income in determining the TANF eligibility of a minor parent. By not limiting assistance to minor teens in the poorest of households, the state runs the risk of increasing its caseload of minor teens and therefore, the risk of increasing welfare program costs. Vermont views the cost along with the potential benefits. Notes Steve Gold, "When we get a teen mother into the welfare system, we immediately involve her in mandatory school participation and effective case management. We expect that the cost of including more minor teens will translate into improved outcomes. For a minor teen mother this includes the possibility of better educational status, longer intervals between children, and improved employment potential. This could mean that over the years, the young mother and her child(ren) will not need to return to TANF as much as she might otherwise - all that can add up to long-term TANF cost savings as well as savings to our other systems: child welfare, homeless services, corrections, etc. Viewed in this way, the TANF cost is modest."

"Given the relatively small group of minor teens and our high grant levels, the financial savings from deeming were not sufficient to contravene these social policy goals.

The key issue in eliminating grandparent deeming in Vermont was not a financial one, but rather that of removing a perverse incentive that pushed minor pregnant and parenting teens out of their parents' homes" Gold notes. Prior to eliminating deeming, it was not uncommon for grandparents to refuse to cooperate with the deeming process, thereby forcing the teen to leave in order to get a grant. Ending deeming removed this as an issue and, Gold explains, "promoted the minor remaining with her family of origin, which in most cases is considered the most positive living situation. The promotion of the family of origin is enhanced when deeming is removed. It is a valuable corollary to the living arrangement requirement."

"Vermont's position is that intensive effort with minor pregnant and parenting teens is necessary to achieve positive outcomes for both the minor parent and her child(ren). Ending deeming supports our ability to provide these kinds of interventions while at the same time encouraging family (grandparent) support for and involvement with the teen" Gold notes.

Gold also does not worry that the state will be assisting those who do not need help. "The risk of opening a flood gate for participation by middle class families is not a real risk in our view because in Vermont, everyone knows your business, and your neighbors would make life uncomfortable if a teen in otherwise comfortable family circumstances got TANF. Receiving welfare still carries a stigma in Vermont as elsewhere. Most families who are able to afford to provide for a minor parent on their own will not seek or encourage a minor to seek TANF assistance" Gold explains.

Heads of household. Under TANF, the 60 month lifetime limit on assistance ticks on heads of household, including minor heads of household. However, Vermont operates its living arrangement rule in accordance with a federal waiver approved prior to TANF and the state views the waiver - not TANF - as the controlling policy. "We have a pretty high percentage of minors as heads of household

because in Vermont, since we don't deem, more minors can receive their own grant even if the parents they live with don't receive TANF and because we allow a minor in a TANF family to get her own grant. The federal government, if it finalizes TANF rules as they have been proposed, may expect Vermont to run the federal time limit clock on minors who are heads of household. According to Steve Gold, we are taking issue with federal interpretation of what states with waivers can and can not do in an array of areas; we think our state policy is the best for minor teens and we think the federal law allows us to continue it if we choose to do so. We may revisit this issue if the final TANF rule fails to reflect state flexibility; we could change our policy or we could continue to contest the federal interpretation.

Transition. When a minor mother applies for TANF and she is subject to the living arrangement rule, she may get provisional TANF for 30 or more days as long as she is making a good faith effort to locate appropriate housing. This type of provisional assistance also is available if she leaves an approved arrangement to look for another. The state has established a set of good cause criteria that define acceptable reasons for leaving an approved living arrangement.

TANF Disqualification. Failure to meet the living arrangement requirement results in a sanction. In Vermont, the sanction is in the form of a vendored payment. Of the 115 pregnant minors and minor parents receiving TANF in 1996, one was sanctioned for non-cooperation.³⁶

Appeals. Any TANF recipient can request a hearing through the regular Human Services Board of Appeals process on any decision made on his/her case.

STATE MANAGEMENT OF MINOR PARENTS

Once a teen parent is part of TANF, case management is provided by a community based organization, one of the 15 Vermont Parent-Child Centers (VPCC) sites around the state. The welfare agency meets monthly with PCC staff to address the full range of teen parent implementation issues, including the minor living rule.³⁷

Before a minor teen enters TANF, however, she may well have come to the attention of a nurse who works with the teen during pregnancy.³⁸ The nurse is to help identify a supervised living arrangement for those pregnant minors who are not exempt and not living in an approved setting. No later than 30 days prior to the planned application for TANF, the nurse sends a minor parent referral form (signed by the minor parent) to the local welfare office. The local welfare office sends materials to the minor teen and then schedules an intake session; the nurse is notified about the scheduled intake appointment.

At the welfare office during intake, the Eligibility Specialist reviews the minor's living arrangement. If it is acceptable, TANF payments begin. If it is not acceptable, a minor who is otherwise eligible begins to receive a provisional TANF payment. In either situation, the welfare office passes along the information to the PCC case manager.

The first step PCC takes regarding the minor teen's living arrangement, is to coordinate with the nurse who was involved with the minor pre-TANF as well as with the eligibility specialist. In addition, it is the responsibility of the PCC case manager to connect monthly with the adult supervisor of a minor teen's living arrangement in order to discuss any problems and to keep the adult advised of any major changes in the minor's REACH UP (welfare/work program) Plan.³⁹

The PCC contract with the state establishes that each center will provide intensive case management services to REACH UP (welfare) program participants with particular emphasis on Job Readiness activities. PCC provides 8 core services: home visits, early childhood services, parent education, parent support, onsite services, community development, playgroups, and information/referral. With respect to the living arrangement rule, the PCC case manager may be involved in finding alternatives and in monitoring existing arrangements.

PCC case managers who deal exclusively with minor, teen, and 20-21 year old parents, are expected to average 30 welfare participants at any time during the year; the inclusion of a minor lowers the caseload by one. Thus, the case manager works with 15 minors (that is the maximum caseload).⁴⁰

It is the responsibility of PCC to collect data on the living arrangement status of minor teens in the welfare program. Reports are submitted quarterly to the state welfare agency.⁴¹

Information Dissemination: State Agency and Providers. The state has developed detailed policies and guidance with respect to the living arrangement rule. The policy defines which minor parents are subject to the rule, the types of approvable living arrangements, the availability of transitional grants and acceptable reasons for leaving a supportive living arrangement. The policy also makes clear that failure to participate in a supervised living arrangement does not result in denial of assistance; rather, the other welfare/work program rules still apply to the minor unless otherwise exempt. The state has also developed guidance which delineates at what point different agency staff are responsible for what living arrangement intervention and the communications loop that needs to be followed between the different staff. In addition to guidance that describes which agency staff does what and when, the state has guidance that helps define more subjective issues such as which type of living arrangement is most supportive for differently situated minor parents. For example, the guidance distinguishes between a minor mother age 15 with a history of abuse and a 16 year old who is able to prioritize her child's need. The former needs the most supportive environment such as 24 hour adult supervised setting while the latter may need a setting in which the case manager is available within a day. Other guidance describes the desired characteristics of adult supervisors.⁴²

As part of its contract with the welfare agency, PCC provides the case management, assessment, monitoring, and data reporting related to the living arrangement rule for all TANF minor parents. In monthly meetings with representative directors of the 15 PCC site directors, the state agency discusses

directly any concerns regarding implementation of the rule. The meetings cover not only this rule but also the gamut of welfare/work rules that apply to TANF teens of any age. Both PCC and the welfare agency shape the agenda for these meetings.

The interaction at the monthly meetings sets up a dynamic that allows the state agency to learn about implementation nuances. It can then help address thorny issues, clarify policy or revisit policy positions. For example, in Rutland, the PCC secured funding for an aggregate living facility. This would help Rutland address the need for expanded alternative living arrangements. At the same time, the state was asking all of the PCCs to assist in expanding alternative secondary school options for minor and older teen parents receiving welfare. The Rutland PCC proposed placing a secondary schooling program within the new aggregate living facility. All of the players agreed that this approach helped achieve the goal of integrated services. It also underscores how the living arrangement and achievement of welfare to work goals, in this case, participation in education, can become intertwined. The same outcome might well have occurred without the monthly sessions but as Steve Gold notes there is little doubt that because of our regular meetings we have come to trust and respect each other and develop a genuine partnership and mutual learning community which results in this kind of new approach.®

INTEGRATION OF STATE EFFORTS

State Child Welfare Agency. An interagency agreement between the child welfare and the TANF agencies was forged in 1998 to address living arrangement issues. Under the agreement, the welfare agency will be able to tap the child welfare agency for supervised living arrangements and the child welfare agency will call on the welfare agency for work/welfare case management. Of the 150 teens (12-18 years old) currently in state custody, about 20 give birth each year.⁴³ The interagency deal is considered a win/win proposition by both agencies.

One part of the agreement calls for TANF to pay for specialized foster care. Foster care homes would be made available to those minor parents who are not in the custody of the state and who volunteer for such placements. The advantages for the TANF agency include:

- # an increase in the number of alternative living arrangements available;
- # a setting which provides close supervision; and
- # cost savings.

With respect to cost, TANF pays the specialized foster care provider what the child welfare agency ordinarily would pay: a flat grant for the teen parent and since 1997, a flat grant for the baby totaling about \$350 per week.⁴⁴ The money is a combination of the minor's grant and TANF surplus funds. This cost is lower than what the state would pay to place the minor in a residential

care facility.

The specialized foster care also is viewed as advantageous to the child welfare agency. According to Jean McCandless "We may achieve some placement prevention. That's because many younger minor parents may have been sexually abused but never came into our system. By opening TANF-funded specialized foster homes to these girls, we believe we will provide services to at least some young women who could have qualified if they were in custody, but who now will get these services without being in our custody." McCandless notes that the number of specialized foster care slots will be limited and there may be no guarantee that such a slot will open. The child welfare agency is seeking foundation support so that we can better assure we will always hold a bed for a minor parent. The child welfare agency has recruited foster parents, provided special training and is going to pilot a senior foster parent peer consultation to support participating foster homes.

The second part of the agreement allows minor parents to participate in work/welfare case management. McCandless says "This is wonderful because it means our kids in custody will stand a little better chance of making it in the world of employment. The child welfare agency has no capacity to focus on work readiness issues which is exactly what PCC case management can do. When our minor mothers get out of custody they will now have a plan and more skills in place so they can move forward."

The use of PCC case management by minor parents while they are in state custody is viewed as advantageous by the welfare agency as well. This is because most minor parents in custody leave it for welfare. Absorbing these young parents adds costs to the welfare agency but the agency views it as cost effective in the long run. As a PCC director, Linda Dean-Farrar explains, "We're going to get her sometime; we are all better off the sooner she focuses on education completion and work readiness."

Some minors in the child welfare system leave foster care homes and move into approved settings through the Independent Living Program which serves youth ages 16-19 who have been part of the child welfare system. Some are parents, others become pregnant. The Independent Living Program is administered through the child welfare agency and supports not only housing but also additional supportive services⁴⁵. The income package for the Independent Living Program is greater than the TANF grant.

One Independent Living Program provider, Spectrum, offers 44 youth help in getting apartments and mentors including about 5 minor mothers per year and the few others who become pregnant. According to Will Rowe, Spectrum's executive director, his program could expand to include unhoused minor mothers referred by the welfare agency but it would be big challenge because these mothers come with little support. In contrast, the Independent Living teens have child welfare agency dollars that pay for shelter and a variety of other supports. The welfare teen mother who shows up at the door only brings a cash grant.

Rowe notes that homeless teen mothers resist systems; they resist adults. We have some terrific homes for mothers but most homeless kids won't go near anything regimented or institutionalized. Spectrum is attractive to runaways as well as those in state custody because it is not regimented. Spectrum is working on a collaboration with a residential home for teen mothers through which staff from the home would come to Spectrum's teen drop-in center to focus on pre-natal care and parenting issues. In turn, Spectrum might provide the teen mother home with substance abuse counseling/education.

Education. Completion of high school or its equivalent is the primary task for all minor teens receiving cash assistance. Agency officials note that this has frequently been frustrating due to the poor histories these teens have in public school, and the negative attitudes many schools have toward pregnant teens. In 1998, the Department of Social Welfare through REACH UP provided grants for each district to create new secondary education programs that will service teenage parents receiving public assistance who lack a high school degree or an equivalent certificate.⁴⁶ The grants are administered by each PCC but should reflect the collaborative efforts of the local Community Partnerships and the Adult Education Councils. These councils include traditional secondary education providers -- i.e. high schools, Vocation Technical Centers, ABE providers, Community Colleges of Vermont, etc. PCC case manages both the living arrangement and the education/work requirements of teen parents. As Karen Ryder notes, It is the view of the welfare agency and our PCC contractor that a successful living arrangement placement contributes to successful secondary education outcomes. The issues are twinned. Through the PCC contract we are structured so that a single case manager is focused on both. The new education grants reflect what PCC case managers were telling us - if you insist teen mothers return to the school from which they dropped out you are setting some up for failure. So we are moving forward in providing educational alternatives - in the communities where the teen is living so that she can keep the community supports she has established.

THE NEED FOR ALTERNATIVE LIVING ARRANGEMENTS

The availability of alternative living settings varies in different parts of the state. For example, the Rutland area had the highest number of waivers which allowed minor mothers to live independently. In part, the waivers reflect the lack of appropriate settings. While there sometimes physical spaces that were available, there were no supports located nearby. The solution has been a new home for 6 teen parents with 24 hour supervision where the teens can live until they are 18. The Rutland County Community Land Trust, an organization which buys housing to preserve it as affordable housing or serve the needs of special populations, purchased a building in Rutland which will have six small apartments and an education center for minor parents. They will rent the entire building to the Rutland Parent-Child Center for these purposes. DSW will pay the rent for the building.

In Burlington, a zoning dispute has hampered the siting of a facility for minor mothers designed to provide supervised congregate apartments for teenage single parents, along with other housing. As PCC Director Dean-Farrar noted, I wish we could have a nice home for all of our teen parents

where they could be mothered 24 hours a day because some of them missed out on mothering when they were growing up. The need for such supportive environments is tremendous by those with whom we work. We also worry about the few very needy young mothers who won't come through our door but who need a roof too.@"

IMPACT

Assistance Denied. In Vermont, those who are sanctioned lose control of their grant. Instead of receiving a grant, the recipient gets assistance through vendor payments. The minor teen living arrangement rule resulted in 1 out of the 112 minor parents receiving TANF was sanctioned in 1996. This represented 0.08% of the minor parents receiving TANF in that year.

Supports for Sanctioned Teens. Under Vermont's rule, minor teens who are sanctioned stay in TANF and are expected to continue to meet requirements and continue to be eligible for services. The rule states that,

All pregnant and parenting minors, regardless of their school-attendance or dependent status, age, pregnancy, the age of their youngest child or participation in a supervised living arrangement are required to participate in Reach Up unless exempt. They will have a [plan] which includes a requirement to participate in a case-managed support, education or training program.@"

Has the Rule Caused Any Changes in Living Arrangements? The data indicate that there have been some significant changes over time in the types of living arrangements of minor parents receiving TANF in Vermont:

Number of Minor Parents Receiving TANF

Year	Number of Minor Parents	Living with Parent	Living with Child's Other Parent	Living with Relative	Living with Adult Supervisor/ Supervised Residence	Other Approved Living Arrangements	Sanctioned for Non-Cooperation
1998	98	61.2%	17.3%	3.0%	10.2%	7.1%	1.0%
1997	112	64.2%	18.0%	3.5%	2.6%	10.7%	0.08%
1996	112	46.4%	35.7%	5.3%	2.6%	4.4%	0.08%
1995	116	54.0%	26.0%	0.0%	22.0%	4.0%	4.3%

[1998 as of 9/30/98]

The percent of minor parents living with a parent, living with the child's other parent, or living with an adult supervisor/supervised residence has fluctuated over the years. Compared to 1995 and 1996, the 1997-98 period has seen a substantial increase in minor parents living with a senior parent; at the same time there has been a dramatic decline in the percentage living with the other parent of the child. With respect to living in an adult supervised setting, the story is less clear - there was a significant drop in the middle years and the percentage is climbing back up.

EVALUATION

While Vermont's welfare program is currently being evaluated by the Manpower Demonstration Research Corporation, the rule is not part of this experimentally designed research project. More informally, many state officials and others share a view that the rule is working well because it is harming very few and because it is helping to contribute to the overall success of participants. Notes Steve Gold: "From our perspective, the living arrangement provision has been a dramatic success; a key measure is that very few minor mothers have been sanctioned for refusal to cooperate." PCC director, Linda Dean-Farrar concurs with the measure of success noting, "I think the evidence that it is working is that we have had very few sanctions." Adds Karen Ryder, "We've been able to focus on placing minors in suitable living arrangements but placements don't equal success; success with the living arrangement rule is possible because it is part of a whole package for the minor that is driven by the case management through the PCC's."

ENDNOTES

-
1. *TANF Report to Congress, 1998*. U.S. Department of Health and Human Services
 2. For a review of the TANF law, see CLASP's *A Detailed Summary of Key Provisions of the Temporary Assistance of Needy Families Block Grant* by Mark Greenberg and Steven Savner, 1996.
 3. Before 1996, states had the option to mandate that minor mothers meet a living arrangement requirement but most did not. The states that implemented the option were mandated to adopt of set of exemptions listed in the law or ask the federal government for approval to make changes to the list of exemptions. The new federal law requires all states to establish a minor parent living arrangement requirement although under the new law, states have the discretion not to provide TANF to minor parents (or other groups).
 4. (42 U.S.C. ' 608(a)(5)(A))
 5. (42 U.S.C. ' 608(a)(5)(B)(ii)).
 6. Massachusetts has a developed minor parent living arrangement rule and a network of state funded *second chance* homes. The Massachusetts program has been the subject of a number of reports including *Improving Outcomes for Mother and Child: A Review of the Massachusetts Teen Living Program* by Kathleen Reich. John F. Kennedy School of Government, Harvard University, April 1996 and *Evaluation of Programs for Teen Parents and Their Children* by Mary Collins. Boston University School of Social Work, June 1998. Arizona, Massachusetts, and Virginia living arrangement policies were reviewed in *Implementing Welfare Reform Requirements for Teenage Parents* by Robert Wood and John Burghardt. Mathematica Policy Research Inc for the U.S. Department of Health and Human Services, October 1997.
 7. Illinois had 9,822 births to minors age 17 and younger; California, Texas, Florida, and New York had more. Child Trends, *Facts at a Glance* October 1997
 8. The living arrangement policy in Illinois was implemented under a state option available through the Family Support Act of 1988. The FSA gave states an option to establish a living arrangement rule but required those states which implemented the rule to follow the federal legislation's list of exemptions. Illinois' exemptions included those in the FSA and a few additional exemptions (e.g. the minor is exempt if participating in a substance abuse treatment program away from home).
 9. Manual Release # 97.148 *Minor Parent Live-at-Home Policy*; 12/31/97

-
10. The federal law allows but does not require states to provide assistance to pregnant women.
 11. According to staff with the Poverty Law Center, at least one supervisor did not understand the verification/application procedures. The rules provide that a teen may apply and supply the verification materials herself; the supervisor, however, insisted that the teen's adult relative accomplish these tasks.
 12. Manual Release #97.148. Minor Live at Home Policy 12/31/97
 13. This is the case unless the other parent of the minor parent's child is also in the household.
 14. The grandmother's monthly income, less allowable deductions, must be less than \$1116 (the federal poverty line for a family of three) for the minor mother to receive a full TANF grant; the minor mother may be eligible for a partial TANF grant if her mother's income (less deductions) is less than \$1394.
 15. TANF Overview: Teens@Bureau of Policy and Training; August, 1997
 16. The form entitled Representative Payee for Teen Agreement [DPA 3606 (N-7-95)] states that the RPT agrees to work with the teen parent and the Illinois Department of Public Aid to make sure that the monthly check I receive on behalf of the teen and the child(ren) is spent for their benefit. I understand it is my responsibility to help the teen parent learn to manage their money, care for their family, and cooperate with the AFDC education and training requirements.
 17. TANF Overview: Teens. Illinois Department of Human Services; Bureau of Policy and Training, August 1997.
 18. The Ounce of Prevention Fund; April, 1998 Fax to Site Directors.
 19. State of Illinois Plan for Temporary Assistance for Needy Families states Awards of the Department of Children and Family Services participating in the DCFS Independent Living Program under the supervision of a case manager are living in an adult supervised arrangement and may qualify for TANF if they have a child. The Independent Living Program is a federally funded Administration for Children and Families' (ACF's) program that is intended to help adolescents in foster care (and those over age 16 who were formerly in foster care) adjust to adulthood through assistance in such areas as housing, employment, and social relationships.
 20. DCFS/Office of Quality Assurance 11/5/97
 21. The state housing agency indicates that the local housing authority/state housing development

authority has not been engaged in discussions regarding the minor parent living arrangement and that the state has not used federal funds for second chance homes.

22. Chicago Coalition for the Homeless Press Release April 8, 1998: *State Will Double Funding for Homeless Youth Programs*

23. Report of the Governor's Task Force on Homeless Youth. September 6, 1985 [p.35]. 4,335 homeless youth were contacted; of the actual sample, 18% were pregnant or parenting minors.

24. *The Statewide Homeless Youth Campaign* Chicago Coalition for the Homeless [undated]

25. State policy does not require a permanent address; author's personal communication with Denise Simon, Acting Chief, Bureau of Child and Adolescent Health, Department of Human Services.

26. State policy allows protective payee plans for teen parents who are approved to live independently; author's personal communication with Denise Simon, Acting Chief, Bureau of Child and Adolescent Health, Department of Human Services.

27. For example, according to Carolyn Shapiro, staff attorney with the Poverty Law Project one teen parent who might have met the independent living exceptions left the welfare office after being told that her adult relative would have to receive the grant for her; in fact, the exceptions allow for the minor to receive her own grant in certain circumstances.

28. Manual Release #97.148. Minor Live at Home Policy 12/31/97. *If the minor parent doesn't meet the [living arrangement] requirement and doesn't meet any of the exemption criteria, the case must be changed to TANF MANG [Medical Assistance, No Grant]. In addition, Minor parents who receive TANF MANG because of failure to meet the live-at-home requirement become eligible for cash upon reaching age 18. They must request a SWAP to cash*

29. *Illinois Welfare News* April 1998 *Let's Get It Right!* The Illinois Poverty Project

30. A chart *Minor Parents Who Are Heads of Households: By Living Arrangements* provides numbers for these two periods.

31. The caseload decline in Illinois is 25.2% between FY 95 and 98; the decline between FY 97 and 98 (based on a preliminary estimate using the first 9 months of the fiscal year) is roughly 10%.

32. CLASP/CBPP State Policy Documentation Project.

33. Vermont modified the minor living arrangement rules through a waiver which among other things, required that minors not living in a supervised setting meet with a caseworker three times a month; at least one meeting is at the place of residence.

34. ANumber of Minor Parents Receiving TANF@ Vt DSS, 1998

35. Conversation with Steve Gold, Vermont

36. Quarterly Statistical Report, July-September 1996

37. The Vermont welfare agency trains the PCC staff on Vermont's welfare program rules (REACH UP) including the living arrangement provision.

38. A minor may become eligible for welfare at the beginning of the third trimester of pregnancy. In addition, through state funds, two residential facilities for pregnant women can house minors who are pregnant but not yet eligible for TANF.

39. The state has established guidance AProcedures for Supervised Housing for Minor Parents@ which delineates the sequence of actions to be taken by those who work with pregnant teens prior to TANF receipt, the TANF eligibility specialist and teen parent service providers.

40. A minor parent counts as 2 adult parents. PCC caseloads vary around the state from 30-75. The caseload is reduced by the 2 for 1 minor parent ratio up to 1/3 of the total caseload.

41. The quarterly PCC reports also include basic demographic information, reasons for participant termination, reasons for minor non-cooperation with other welfare program rules, referral from the child welfare agency, and the number of minors who became pregnant.

42. ANFC Policy Bulletin No. 94-12F (7/1/94); AProcedures for Supervised Housing for Minor Parents;@ AAssessing Living Arrangements Procedures;@ ACharacteristics of Minor Parent and Need for Support;@ and AGuideline Characteristics of Adult Supervisors.@

43. Conversation with Jean McCandless. The child welfare agency is focused on pregnancy prevention and is in its third year of a sexuality education program that is foundation funded. The project provides for a full time sexuality education coordinator within the child welfare agency.

44. Since 1997 the child welfare agency has given foster care parents a payment for the infant along with the traditional payment for the teen according to Jean McCandless. Even with the new fiscal arrangement, McCandless notes that child welfare A minor parents give us a real

challenge -- on the one hand we talk about family preservation and keeping children with their parents; yet keeping the minor and the baby together is often difficult, there is a system bias that holds that a minor with a baby faces insurmountable odds. A foster parent with a minor who gives birth might decide not to keep the infant so we are faced with a new hurdle.®

45. The Independent Living program provides services to youth, age 16 and over, who are in foster care or who were in foster care after the age of 16, to help them make the transition to independent living. Activities include educational and employment assistance, training in daily living skills, individual and group counseling, coordination of services, outreach programs, and the development of individualized transitional living plans.

This is an entitlement program with a fixed funding level. Funds are awarded to States in the form of grants. Each State is eligible to receive a portion of the funds appropriated that is equal to each State's proportion of the national total of foster children that received maintenance payments under the IV-E Foster Care program in fiscal year 1984. For example, if 10 percent of the foster children who received maintenance payments under the Foster Care program resided in a particular state in FY 1984, then that state is eligible for 10 percent of the funds available. States are required to provide a 50 percent match for the funds over their share of \$45,000,000.® [www.acf.dhhs.gov]

46. The programs are required to offer a minimum of 15 hours per week of academic programming during the school year and the planning for the program must involve teen parents. Funding for this effort comes from TANF. A separate cash incentive program for teen parents will provide a bonus upon reaching a secondary education benchmark that is individualized for each teen parent who participates.