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# Colorado Guide 2: TANF for Local Communities

## Over 50 Ways to use your TANF!

### A "How To" Guide



Prepared by Spark Policy Institute on behalf of the  
Blending & Braiding Your TANF Initiative

In cooperation with the  
Colorado Systems of Care Collaborative  
& funded by the Colorado Department of Human Services



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## INTRODUCTION TO THIS GUIDE

The purpose of The Colorado Guide to TANF for Local Communities is to demonstrate how to maximize the impact of TANF through its flexibility to meet critical gaps in safety net services, leading to improved outcomes for low-income families. TANF is often referred to as a very “grey” funding stream due to the lack of concrete information available about specific uses and its relative flexibility compared to other government funding sources. This guide will help service providers and local TANF administrators navigate the “grey” and explore the scope of this funding source to more creatively meet the needs of low-income families outside of the traditional realm of welfare.

TANF funds, according to federal TANF regulations, are classified as either “assistance” or “non-assistance.” (The distinction between non-assistance and assistance will be addressed in greater detail later in the guide). TANF administrators at a county level are familiar with TANF as a source of assistance targeted at addressing the ongoing basic needs of low-income families. This guide will provide an overview of over 50 of the more widely used “non-assistance” services that transcend direct welfare support and are more preventative in nature. It is important to note that TANF, similar to any government funding source, is a finite resource and, as a result, should be used strategically. The overall flexibility of TANF provides an opportunity to both blend and braid TANF funds to enhance programs, provide seed funding for new initiatives, and to support system capacity building efforts.

### *Audiences and key purposes for this guide:*

- Providing information to County TANF Offices on the flexibility of both how they can spend their funding on supportive services within the four purpose areas of TANF and the types of supportive services that meet TANF eligibility guidelines;
- Providing information to non-profits, faith-based organizations and other entities whose safety net services might benefit from a partnership with TANF; and
- Providing information to systems building and/or leadership coalitions, seeking to develop a comprehensive array of services tailored to meet their community’s needs, using TANF as one of the funding streams.

**How to use this Guide:** This guide is intended to provide a range of ideas to help those enhancing and developing services and integrating service delivery models with the support of TANF funds. The guide is best used by learning about TANF through the background materials, understanding the purpose areas of TANF, and then reading sections on services that are relevant to your community. The guide provides:

- A broader understanding of TANF as a funding stream;
- An overview of TANF eligible services; and
- Detailed examples of supportive services that can be provided with TANF funding.

While this guide will address the use of TANF as Basic Cash Assistance, its primary focus is the strategic application of TANF for a broad array of “non-assistance” supportive services.

### *This guide is not intended for:*

- In-depth information about federal or Colorado TANF guidelines, except as it relates to supportive services that can be provided using TANF funding. TANF has many complex regulations that go beyond the service elements. To learn more about those regulations, please contact Colorado Works, a Division of the Colorado Department of Human Services.

- Legal and regulatory advice on the services listed. The information contained in this guide was accurate as of 2010. However, laws and regulations related to TANF are regularly updated. As you identify services to fund using the list provided in this guide, outreach to your local TANF office and the state Colorado Works office to clarify any changes in the laws and regulations that might affect the design of your program.

This guide is one of three guides developed as part of the Blending & Braiding Your TANF Initiative in Colorado. The other guides can be accessed at <http://sparkpolicy.com/fiscalguides.htm> and include:

- Colorado Guide to Partnering with Your Funders; and
- Colorado Guide to Blending and Braiding.



## A BRIEF INTRODUCTION TO TANF

Temporary Assistance for Needy Families (TANF) is considered the principal federal safety net for impoverished families. The TANF program was created as a result of the 1996 Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) – sweeping welfare reform legislation that embodied federal efforts “to end welfare as we know it.” TANF replaced Aid to Families with Dependent Children (AFDC), a federal assistance program administered from 1935 to 1996 by the United States Department of Health and Human Services, which provided financial assistance to children whose families had low or no income. The 1996 welfare reforms shifted the intent of this safety net under AFDC from an income maintenance program to an employment program under TANF. The law has gone through multiple reauthorizations, including 2002, 2005, and 2010, each of which have modified the program.<sup>1</sup> However, the current reauthorization is temporary, and the program will again be reviewed for reauthorization in 2011.

“Under the TANF structure, the federal government provides a block grant to the states, which use these funds to operate their own programs. The basic federal TANF block grant has been set at \$16.5 billion since it was established in 1996. As a result, the real value of the block grant had already fallen by 28%. However, the 1996 Personal Responsibility and Work Opportunity Reconciliation Act also created supplemental grants for certain states with high population growth (such as Colorado) or low block grant allocations relative to their needy population, as well as a contingency fund to help states weather a recession. These supplemental grants have been extended through federal fiscal year 2010.”<sup>2</sup>

The supplemental grants, critical for states like Colorado, have been reduced as part of the short-term reauthorization of the program. Currently, the reduced amounts go through June 30, 2011 and the supplemental grants end as of July, unless Congress passes additional laws to extend them.<sup>3</sup>

The intent of TANF is to provide states with a great deal of autonomy in the administration of their TANF programs. While there are certain federal prohibitions (i.e., segregated federal TANF funding cannot be used for capital construction), states can exercise broad flexibility in designing their TANF programs. The primary guidance provided on the federal level is that programs and services supported with TANF funding must be reasonably calculated to meet one of the four TANF purpose areas:

- Provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives;
- End the dependence of needy parents on government benefits by promoting job preparation, work, and marriage;
- Prevent and reduce the incidence of out-of-wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies; and
- Encourage the formation and maintenance of two-parent families.

In addition, states must demonstrate support for the TANF program by providing match funding. State and county match funding for federal TANF funds are known as Maintenance of Effort (MOE) funds. The Maintenance of Effort Requirement stipulates that each:

“...state must spend at least a specified amount of state funds for benefits and services for members of needy families each year or face severe fiscal penalties. Specifically, a state must have state expenditures each fiscal year of at least 80% (or 75%, if the state meets the TANF overall and two-parent participation rate requirements) of a historic state expenditure level for “qualified state expenditures,” i.e., certain allowable benefits and services for members of needy families.”<sup>4</sup>



Colorado's State TANF Plan is aligned with the above federal regulation and states that:

"Colorado will continue its maintenance of effort based on FFY 1994 expenditures at the level of at least 80 percent unless federal work participation rates are met, in which case Colorado will reduce its MOE expenditures to 75 percent. In order to meet its annual MOE obligation, Colorado may count any qualifying expenditures that are allowed under federal statute and regulation. Qualifying MOE expenditures are any expenditures made on behalf of TANF-eligible families with household gross income up to \$75,000 per year."<sup>5</sup>

### Understanding "Needy"

The term "needy" is used in TANF Purpose Areas 1 and 2 and in federal requirements related to MOE expenditures. Colorado has defined "needy" families as families with a household gross income of up to \$75,000 per year.<sup>6</sup>

The definition of Needy is repeated in Appendix A for your reference as you read this Guide.

### Understanding "Family Unit"

The terms family or family unit are used throughout TANF regulations and this Guide. TANF has very specific definitions for households that are considered family units. A family unit is a family consisting of children within the 5<sup>th</sup> degree of kinship living with a caretaker relative or parent(s) with unborn child(ren); residing legally in the United States. A family unit can also include a single mother or couple who are expecting a child. Children living with non-relatives would not be eligible for support.

The definition of Family and Family Unit is repeated in Appendix A for your reference as you read this Guide.

### TANF County Reserves

Another component of TANF that contributes to its overall flexibility is the ability of counties and states to keep in reserve the funding not expended in the previous fiscal years. In Colorado, counties may only keep a certain percentage of their yearly allocation in reserves. Carry-over funds (reserves) have to be used for any eligible benefit or service that may be provided under TANF. The only exception to this is the transfer of TANF funding to special programs, such as the Social Services Block Grant and the Child Care Discretionary Fund.<sup>7</sup> For counties, this means that reserves function exactly like the yearly TANF allocation that is not transferred to other programs. They can be used for the same array of services and supports. Since the inception of TANF, states have used their federal TANF funds for a comprehensive range of services from child care to transportation to help low-income families achieve self-sufficiency. The flexibility of this federal funding source provides numerous opportunities for states to implement creative strategies to assist those most in need.

## OVERVIEW OF TANF CATEGORIES

Some services are defined by federal TANF regulations as assistance services, while others are non-assistance services. The categorization is important, as it defines who is eligible to receive means tested monetary assistance and others who are eligible only for services that are not connected to a monetary payment. Financial eligibility levels for some non-assistance can be higher than financial eligibility levels for TANF cash assistance. Note, however, that a family receiving only non-assistance will not be part of a state's TANF assistance caseload, which has implications for TANF participation rates and child support collections.<sup>8</sup>

## Assistance

A number of key TANF requirements, such as time limits, work participation requirements, and child support assignment requirements all depend on whether a family is receiving TANF “assistance.” Any benefits that are “assistance” automatically invoke the TANF rules which include time limits, work participation, data reporting and child support requirements.

According to the final TANF regulations, the definition of assistance is as follows:<sup>9</sup>

- “Cash, payments, vouchers and other forms of benefits designed to meet a family’s ongoing basic needs (i.e., for food, clothing, shelter, utilities, household goods, personal care items, and general incidental expenses) even when conditioned on participation in a work experience or community service activity.”

Examples of assistance include:<sup>10</sup>

- Money for ongoing basic needs such as food, clothing, shelter, utilities, household goods, personal care items, and general incidental expenses.
- Federal regulations also define supportive services such as transportation and child care provided to non-employed families as assistance. However, this is an area where one encounters the multilayered nuances of TANF. There are some cases where unemployed families will receive transportation and/or childcare through a nonprofit, faith-based entity and/or for profit entity that has a contract with a County Department of Human/Social Services to provide transportation and/or childcare support to low-income families in the community. In that particular scenario, the unemployed family who is accessing some form of child care/transportation at a community agency would not have to fill out a TANF application for TANF assistance and the child care and/or transportation support would be perceived as a non-assistance service that does not trigger certain TANF requirements such as the TANF cloak, etc.
- If a family is employed, many services that would count as assistance to unemployed families do NOT count as assistance, including:<sup>11</sup>
  - Child care and transportation benefits;
  - A reasonable work expense allowance; and
  - Job retention and career advancement services for employed families who have left or never received TANF basic cash assistance.

The definition of Assistance is repeated in Appendix A for your reference as you read this Guide.

## Non-Assistance

“Non-assistance” benefits and services are those that do not fall within the definition of assistance. Non-assistance services include:

- Services that do not function as income support (such as education or counseling);
- Supportive services provided to families in which an adult is employed (such as cash assistance used to offset work expenses and child care and transportation assistance); and
- Wage subsidies — i.e., subsidies to employers that are used to help pay someone’s wages — are not considered assistance;<sup>12</sup>
- Education and training, including tuition assistance;
- Employment entry or retention bonuses;<sup>13</sup>

- Contributions to and distributions from Individual Development Accounts; and
- Non-recurring short-term benefits (mostly provided through state and county diversion programs in the State of Colorado) that provide less than four months of support.<sup>14</sup>

Certain services fall under a non-recurring, short-term benefits category:

- Services designed to deal with a specific crisis situation or episode of need;
- Services provided on a one-time basis or for a prospective period that does not exceed four months; and
- Services that are not intended to meet recurrent or ongoing needs.

If benefits are provided to meet a short-term, non-recurrent need, they may be provided to the same client more than once during a year. Payments of the same type may be made in a single year as long as each payment is made without the expectation of making additional payments.<sup>15</sup> If short term non-recurrent benefits are paid beyond a four month period for the same episode of need all of those payments become assistance and trigger TANF requirements, such as the TANF clock, payment of child support, etc.

Non-assistance services must be an allowable TANF expenditure (i.e., meet one of the four purposes of TANF), as described in the Services & Supports chapter. Non-assistance services and non-recurrent short term benefits can be offered without triggering time limits, work requirements, and child support rules.

If authorized under the 1st or 2nd purposes of TANF, the funding must be for a “needy” family or parent. Purpose 3 and 4 of TANF are not designated solely for “needy” families. This enables States to develop community-oriented programs with a prevention-oriented approach.<sup>16</sup>

Counties can contract with private, public, non-profit, and faith-based providers to provide non-assistance services without the recipient(s) of the service being required to fill out an application for assistance, or an Individual Responsibility Contract (IRC) (i.e., a written agreement).<sup>17</sup>

The definition of Non-Assistance is repeated in Appendix A for your reference as you read this Guide.

## UNDERSTANDING DIVERSION (NON-RECURRENT SHORT TERM BENEFITS)

Diversion programs are categorized federally as “non-assistance” and are a strategy to divert TANF-eligible families from long-term TANF involvement. Diversion consists of payments for short term needs to help clients get a job or meet emergency needs instead of placing them on monthly cash assistance. Colorado Works participants, for example, can access short-term, non-recurrent benefits in two ways – state diversion and county diversion:

- State diversion requires that the family meets the eligibility guidelines for Basic Cash Assistance; and
- County diversion is for those families who do not meet the requirements for Basic Cash Assistance but do meet the county’s financial eligibility. Colorado Counties can choose their income eligibility requirements for county diversion within the following parameters: Income eligibility must be set at a standard greater than the specified Basic Cash Assistance income requirement for the state but less than an annual income of \$75,000.

To be eligible for both county and state diversion, adults must be lawfully present in the United States. County diversion is intended to provide benefits and services under the four purpose areas to a broader population than those eligible for Basic Cash Assistance.

Both state and county diversion may include support in the form of cash, supportive services, housing, and transportation and are all based on individual/family need. In addition, the benefit amounts provided through

both state and county diversion are flexible and are defined by each individual county's policy. (Please note: Some Colorado Counties do not have diversion programs.) Recipients of either state or county diversion must enter into a written mutual agreement known as the Individual Responsibility Contract (IRC) (similar to the IRCs that Basic Cash recipients are required to sign) with the county assessment worker that shall:

- Document the reason the participant does not need an ongoing Basic Cash Assistance grant; and
- Define the expectations and the terms of the diversion grant.

Circumstances beyond a client's control shall be defined as those events the client could not have prevented or foreseen, such as a family emergency resulting from a serious/terminal illness of immediate family member; natural disaster (fire, flood, etc.); lack of child care as determined by the County as unavailable; job lay-off or lockout; domestic violence, homelessness, or severe mental/physical disabilities.<sup>18</sup>

State and county diversion payments will not advance the 60-month TANF clock unless greater than four months of cash assistance is provided.<sup>19</sup> In addition, recipients of State and County Diversion who receive a one time or short term payment are not required to assign child support rights.<sup>20</sup> Neither State nor County Diversion programs can exceed 120 days of support. In addition, neither imposes lifetime limits or participation requirements.<sup>21</sup>

Colorado Diversion payments are generally provided in one of the following three formats:<sup>22</sup>

- *“Lump-sum payment.* These payments are generally targeted towards families that have a good chance of finding work quickly and maintaining employment. Lump-sum payments are usually used to assist families who are struggling due to some crisis or unforeseen event. Federal rules do not apply and families are not counted in the work participation rate. Eligibility for lump-sum payments at the county level is determined by the county diversion policy, so lump-sum payments could be used to help a “needy” family who would not qualify for TANF assistance.
- *A precursor program to families before they become ongoing TANF recipients.* A precursor program is similar to a lump-sum program but involves several monthly payments. The program includes more intensive work with the family than does a lump-sum program. The family is provided with supports while a worker helps them to overcome barriers by developing a work plan, locating affordable child care, and providing basic job counseling or job search skills to adults who are basically ready to work but may need some minor assistance to be successful.
- *Bonus or incentive payments for families leaving TANF after becoming employed.* Parents are most likely to lose their jobs in the first few months after leaving TANF, so incentive payments (designed as assistance or non-assistance) can help families make it through the transition period and feel rewarded for their efforts. Incentive payments can be designed in a variety of ways including one-time payments or periodic payments. The amount can stay the same throughout the transition from TANF, decrease as families become more stable, or increase as families successfully maintain employment over a longer period.”

## COLORADO'S TANF PROGRAM

Colorado's TANF Program is known as Colorado Works. Established in 1997 when federal welfare reform was passed, Colorado Works has had many statutory revisions that have been intended to align with changes at the federal level and increase the county flexibility to administer TANF.<sup>23</sup>

In order for Colorado to receive its federal TANF block grant, it must commit to providing match funding known as the Maintenance of Effort Obligation, which is \$88.4 million annually.<sup>24</sup> In addition, Colorado has to meet the Work

Participation Rate requirement as outlined in the reauthorization of TANF under the Deficit Reduction Act of 2005. The Act requires 50% of adults receiving TANF assistance (and 90% of two-parent households receiving assistance) to participate in work activities.

Colorado's TANF program is based on the state plan it submits to the U.S. Secretary of Health and Human Services. The plan details Colorado's eligibility criteria, benefit levels, services (specifically eligibility for cash assistance); who is ineligible to receive TANF support (i.e., fugitive felons); additional Colorado Works benefits and services, and Colorado's eleven defined eligible work activities that can be utilized to meet work participation rates. The plan also outlines administrative policies and procedures, fiscal oversight policies and Colorado's primary sources of Maintenance of Effort expenditures.

As described earlier, a state can use its TANF funds for any services and activities reasonably calculated to meet one of the TANF purpose areas.

Colorado has a basic eligibility standard for TANF recipients. TANF recipients in Colorado must:

- a. "be a family consisting of children living with a caretaker relative or parent(s) with unborn child(ren);
- be residing legally in the United States; and
- have a gross income is under \$75,000 per year."<sup>25</sup>

However, services that are provided through TANF grant initiatives or contracts to community providers that are delivered under Purpose Areas 3 and 4 can serve a broader population as detailed later in the guide.

More than 80% of Colorado's TANF funds are spent at the county level, distributed through a formula based on a variety of factors from population, Basic Cash Assistance caseloads, etc. The remainder of the federal block grant is maintained at the state for administration or held in a long-term reserve fund. Counties receive block grant allocations at the beginning of each fiscal year.

Colorado Counties can exercise a great deal of autonomy in administering their TANF programs. In addition to defining criteria for who qualifies as "needy," counties can choose to provide services directly or contract out services through community nonprofits, other government agencies, faith-based entities, or private agencies.<sup>26</sup> They must, however, maintain appropriate policies as determined by Colorado Works and meet specific federal requirements, which include:

- Work participation rates;
- County level MOE obligations;
- Federal reporting requirements; and
- Spending all TANF funding in one of the four Purpose Areas.

Counties may use different approaches in how they utilize their Maintenance of Effort (MOE) funds in concert with federal TANF funds (i.e., MOE funds can cover capital construction or provide services to certain qualified aliens, which are not eligible expenditures for federal TANF funds). Counties may comeingle, segregate, or separate their federal TANF funds with their Maintenance of Effort funds. It is important to note that when funds are comingled, different eligibility standards apply. For more information on MOE funding options, please see: Administration for Children and Families' Funding Guide for TANF at: [http://www.acf.hhs.gov/programs/ofa/resources/funding\\_guide.htm](http://www.acf.hhs.gov/programs/ofa/resources/funding_guide.htm).

Colorado Works and counties also have the flexibility to transfer a portion of Colorado's federal TANF funding into other programs that benefit low-income families: Childcare Development Block Grant and the Social Services Block

Grant. Only 30% of state TANF funds can be transferred to the child care fund, and 10% to the social services fund. The combined transfer is limited to 30% total across the two block grants. In Colorado, the counties work closely with the state to determine transfers at the local level to ensure the state does not exceed the limits.<sup>27</sup>

## PURPOSES OF TANF

Services provided with TANF funds must be reasonably calculated to meet the four TANF Purpose Areas. The first two purpose areas of TANF are designed to address existing poverty and public assistance dependence, while Purpose Areas 3 and 4 are geared towards preventing the poverty of future generations. The federal Administration for Children and Families, which administers TANF on a federal level, provides some overall guidance on what would be reasonably calculated to meet a TANF purpose. However, there is a great deal of nuance on a state and county level of what is required to meet a TANF purpose area particularly when TANF is contracted out to community service providers. The information below reflects federal guidance on each purpose area and does not cover every nuance of how these general principals may apply to TANF funded services provided by a community provider through a contract with a local county Department of Human/Social services.

Many of the terms used in this section (Assistance, Non-Assistance, Needy, Family Unit) are defined in Appendix A.

### PURPOSE 1

*To provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives.*

Services under Purpose Area 1 can only be provided to “needy” families. Under this purpose area, a combination of *assistance* and *non-assistance* services can be provided. Appropriate assistance services would include money for housing, food, clothing, utilities, household goods, personal care items, and general incidental expenses. Assistance services appropriate for this purpose area also include services like childcare and transportation when provided to non-employed families. If “assistance” services will be ongoing for a period of more than four months, families receiving services under this Purpose Area must be eligible at the Basic Cash Assistance level.<sup>28</sup>

Families that receive TANF *non-assistance* services under Purpose Area 1 must simply meet the state definition of a “needy” family. Non-assistance services appropriate to Purpose Area 1 include supportive services that will help “needy” families keep their children in the home. For example, repairing a pipe system in the home of a needy family to ensure the family has running water would be a service that would meet TANF Purpose Area 1. Providing counseling and guidance support to a low-income family who is struggling to raise a child with a disability would be an example of some of the softer services (i.e., case management, counseling, financial management classes, etc.) that can be provided under Purpose Area 1 to help ensure that a child can be cared for in their own home. Services under this Purpose Area do not have to be provided to a single family. If a community service is providing supports to many families who fit the definition of “needy,” TANF can fund the services. A good example would be a food bank that provides groceries to needy families in the community.

### PURPOSE 2

*To end the dependence of needy parents on government benefits by promoting job preparation, work, and marriage.*

Similar to Purpose Area 1, families served under Purpose Area 2 must be “needy” and if “assistance” services will be ongoing for a period of more than four months, families receiving services under this Purpose Area must be eligible at the Basic Cash Assistance level. Families that receive TANF *non-assistance* services under Purpose Area



2 must simply meet the state definition of a “needy” family. In short, financial need criteria are applied to any families receiving services under Purpose Area 2.<sup>29</sup>

Purpose Area 2 is focused on supporting families, including a noncustodial parent or a working parent, by providing employment, job preparation, or training services. Three specific objectives are highlighted in Purpose Area 2 – job preparation, work, and marriage. Services that contribute to assisting needy parents in these areas would meet TANF Purpose Area 2.

Examples of services that would fall under promoting job preparation include vocational training programs, ESL classes, or other training that would increase employability. Examples of services that would fall under promoting work include job or career advancement activities, refundable earned income tax credits, child care, preschool, and employment services designed to increase a noncustodial parent's ability to pay child support. Activities that promote any of the three objectives – job preparation, work, and marriage -- would be consistent with this Purpose Area.<sup>30</sup>

The following is an example of a collaborative strategy that falls under the *non-assistance* service category, would be aligned with TANF Purpose Area 2, and could be fully supported with TANF funds. A county TANF program could determine that there is high unemployment in their community among low-income families and the local hospital is in need of trained medical assistants. The county could work in partnership with the hospital to provide a subsidized medical assistance training program specifically for needy parents.

### PURPOSE 3

*To prevent and reduce the incidence of out-of-wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies.*

Purpose Area 3 is not limited to needy families or parents and can serve a much broader population. In fact, Colorado's State TANF Plan specifically states that “all Colorado residents are eligible to receive services intended to reduce out-of-wedlock pregnancies and/or encourage the formation and maintenance of two-parent families if paid exclusively with federal TANF funds.”<sup>31</sup> Colorado has a specific goal of achieving a two percent annual reduction in out-of-wedlock pregnancies through TANF Purpose Area 3 programs and services funded across the state. Programs that fall under Purpose Area 3 should, however, establish their own objective criteria for the delivery of services to the non-needy.

Programs that could be reasonably calculated to meet Purpose Area 3 include an array of Positive Youth Development services that reduce high risk behavior that could lead to early parenting. Services provided under Purpose Area 3 are not limited to youth specific services but can be provided to any TANF eligible family that is interested in preventing and reducing the incidence of out-of-wedlock pregnancies (i.e., a single mother with three kids who does not want to have a fourth child until she is married or in a better place economically). Specific services and activities under Purpose Area 3 could include, for example, media based pregnancy prevention campaigns, after school programs that provide supervision, youth mentoring programs, and visiting nurse programs. Services are not limited to group activities and can include mentoring, counseling, and case management with an at-risk teenager.

### PURPOSE 4

*To encourage the formation and maintenance of two-parent families.*

Similar to Purpose Area 3, Purpose Area 4 is not limited to needy families or parents and can serve a much broader population. Purpose Area 4 targets the importance of maintaining a two parent family for the overall socio-



economic well-being of the family (Please note: this only applies when there is no domestic violence or other destructive behavior in the marriage or partnership). This Purpose Area addresses the high percentage of unmarried mothers living apart from the fathers of their children where the fathers would like to be significant contributors to the lives of their children. Purpose Area 4 is intended to avoid the historical problems of welfare programs with rules that discourage family formation and involvement of fathers in their children's lives.<sup>32</sup> It is also intended to help sustain existing marriages by addressing the strains due to fiscal instability and relationship challenges.

Appropriate services under Purpose Area 4 include a wide variety of approaches to building parenting skills, such as nurse home visitor programs; classes and mentoring services to develop healthy relationships, including premarital and marriage counseling; services to address barriers to full involvement by fathers, including mediation services and other activities that promote parental access and visitation; and services that address financial barriers and build financial stability for families, such as job placement and training services. Additionally, many states have developed healthy fatherhood initiatives under this purpose area that increase the capacity of fathers to be emotionally and financially supportive of their children. Services in this area can be provided in a group format or an individual format (i.e., individual counseling/case management sessions or classes and workshops). This purpose area is also appropriate for crisis services that will help keep a family together.<sup>33</sup>

## TANF ELIGIBILITY IN COLORADO

While TANF is a highly flexible program, there are still a number of specific eligibility requirements to meet when providing services. As described earlier, TANF services provided under Purpose Areas 1 and 2 must be for "needy" families, while services provided under Purpose Areas 3 and 4 can serve a much broader population. However, the type of service provided and whether it is categorized as assistance or non-assistance will affect how services are tracked, what federal requirements must be met, and what the recipient must commit to in order to receive the services.

The eligibility levels explained below are returned to throughout the Guide and serve as the key guidelines for appropriate service delivery spending using TANF funding.

### ELIGIBILITY FOR BASIC CASH ASSISTANCE

Basic Cash Assistance eligibility is required for families who are receiving direct cash payments or assistance services for more than four months (not as part of a County or State Division Program). As noted earlier, Assistance services are services that address ongoing basic needs, such as food, clothing, or shelter.

The Colorado State Plan outlines uniform statewide basic eligibility and minimum benefit levels for Basic Cash Assistance based on Aid to Families with Dependent Children (AFDC) rules that were in effect on July 16, 1996, with the following exceptions:

- Families do not have to include half siblings in the same assistance unit if at least one of the half siblings is receiving child support;
- Two-thirds of a participant's income gets disregarded for the first twelve cumulative months of assistance; and
- Two parents are treated the same as single parent families.
- Eligibility criteria for Basic Cash Assistance also include the following:

- Colorado does not impose different eligibility criteria or benefit levels on families moving into Colorado from other States;
- Colorado does not impose a family cap;
- Colorado does require the assignment of child support rights as a condition of eligibility for Colorado Works;
- Expectant parents who are pregnant are eligible; and
- All work eligible individuals must sign and comply with an Individual Responsibility Contract (IRC).<sup>34</sup>
- Eligibility at the Basic Cash Assistance level comes with many requirements, including the:
  - 60 month time limit requirement (i.e., a family cannot receive more than 60 months of TANF support), which can be extended in the cash of hardship or domestic violence if approved by the county department;
  - Work participation, which requires that recipients participate in work activities unless exempt (exemptions can include a variety of factors from being disabled to domestic violence, etc.). Work activities fall into 11 federal categories: (1) unsubsidized employment; (2) subsidized private sector employment; (3) subsidized public sector employment; (4) work experience; (5) on-the-job training; (6) job search and job readiness assistance; (7) community services programs; (8) vocational educational training; (9) job skills training directly related to employment; (10) education directly related to employment (for those without a high school degree or equivalent); and (11) satisfactory attendance at a secondary school.<sup>35</sup>
- Assignment of child support rights, which requires that families applying for TANF must sign over to Colorado all rights to unpaid child support owed before and during the assistance period.<sup>36</sup>

## ADDITIONAL ELIGIBILITY CRITERIA FOR TANF “ASSISTANCE” RECIPIENTS

Please Note: These stipulations specifically apply to TANF “assistance” recipients. There may be scenarios in which these eligibility requirements are not applicable because the service (although funded through a TANF contract) is provided by a community provider to the broader population.

**Sixty-Month Time Limit:** Families on Basic Cash Assistance are limited to 60 months of assistance unless they are provided with an extension as a result of a hardship such as domestic violence or a disability. The TANF clock starts once the family receives assistance. If, for example, the family stops receiving assistance after a year, the clock will stop and restart again if assistance is again required. The TANF clock, however, once triggered never returns to zero. Extensions are only implemented when a family has reached 60 months of assistance.

**Felons:** In Colorado, felons can receive TANF assistance. However, a fugitive felon (anyone with an outstanding arrest warrant) cannot receive TANF support though Basic Cash Assistance. In addition, “current departmental rules call for persons who have committed intentional program violations that are fraud to be disqualified from the Colorado Works Program, and others, such as fleeing felons or illegal aliens, to be excluded from the program. In both instances, other family members can remain on welfare and children of that person can receive the basic assistance grant. Persons convicted of drug-related felonies after July 1, 1997 cannot receive TANF unless the county has determined such person has taken action toward rehabilitation.”<sup>37</sup> Ex-offenders with drug convictions cannot receive TANF assistance. Parole and probation violators are also not TANF eligible.

**Illegal Immigrants:** Illegal immigrants are not eligible for TANF. Some states use MOE funding to support illegal immigrants.

**Legal Immigrants:** TANF services provided to family members age 19 and over can only be provided to “legal immigrants who have been in the U.S. for at least five years. This restriction applies not only to income assistance, but also to TANF-funded work supports and services such as child care, transportation, and job training.”<sup>38</sup>

**Minors who are Parents:** Unmarried minor teen parents who receive assistance must live with adults (with exceptions for good cause) and stay in school.<sup>39</sup> According to the Colorado State plan, a minor parent is a parent who is under age 18. “All unmarried minor parents are considered children for purposes of time limits and budgeting. Minor parents who have not completed high school or its equivalent must attend high school, work on a GED, or be in an alternative education training program approved by the State in order to be eligible for assistance unless receiving benefits paid with segregated state/local funds.”<sup>40</sup>

**Child Support Non-Cooperation Restriction:** Families that repeatedly do not cooperate with child support assignments will not be eligible for TANF. “Sanctions are imposed on individuals for failure to comply with child support enforcement, work activities, or to secure immunizations for their children.”<sup>41</sup>

**Child Only TANF Eligibility:** “Child-only cases are typically defined as those TANF cases in which no adult recipient is included in the TANF cash grant. Child-only cases are classified as either parental or non-parental. Parental child-only cases are those cases in which a parent is present in the household, but is ineligible for TANF receipt due to a sanction, time limit, SSI receipt or alien status. Non-parental cases are those cases in which no parent is present; the children are residing with a relative or other adult with legal guardianship or custody.”<sup>42</sup>

**Eligibility when Child is Absent from the Home:** A child typically must be present in the home for a family to receive basic assistance TANF support. “Exceptions to this requirement are granted for: (1) children receiving medical care or education, which requires them to live away from home; (2) children visiting an absent parent; and (3) children in temporary foster placement.”<sup>43</sup>

**TANF and Older Youth:** Currently TANF only provides basic assistance or supportive services for youth under the age of 18 or a youth “between 18 and 19 who is expected to graduate from high school, secondary school or an equivalent vocational training program prior to his/her 19th birthday.”<sup>44</sup> The one exception is if the youth is pregnant.

## ELIGIBILITY FOR SUPPORTIVE SERVICES (NON-ASSISTANCE)

While Purpose Area 1 and 2 services can be provided to anyone who is Basic Cash Assistance eligible, they can also be provided to families who are Supportive Services eligible (which has the advantage of not triggering the federal requirements of the 60 month TANF clock, the work participation agreement, child support assignment and comprehensive data reporting).

- To be eligible for supportive services, families must:
- Meet the definition of a “family unit” (see Appendix A for the full definition);
- Meet the definition of “needy” (see Appendix A for the full definition); and
- Be legally in the United States.

Additionally, the income limit associated with “needy” can be decreased according to a local county policy. It is important to note that in the area of child care and transportation, there is a distinction in whether the service is considered a supportive service or basic assistance. If the child care or transportation support is provided to an unemployed family, the family must be eligible at the Basic Cash Assistance level. If the transportation and/or child care support are provided to an employed family, it is considered a supportive service. In addition, services

designed to deal with specific episodes of need that will not extend past four months would be considered a supportive service that would not trigger the federal requirements. Such benefits can be provided more than once during a year if the expectation is that the benefit is not intended to meet a recurring need. An example of supportive service eligible TANF recipients would be an employed young couple with a child who need short-term child assistance in order for the mother to work.

**Please note:** Basic Cash Assistance recipients can also receive any non-assistance supportive services and/or participate in various county contracted services.

## ELIGIBILITY FOR PURPOSE AREAS 3 AND 4

Eligibility for services that fall under Purpose Areas 3 and 4 will depend on the accounting practices of the county. The State of Colorado has determined that:

“Eligibility criteria regarding income and family composition are not relevant for community services under Purposes 3 and 4 delivered via **segregated federal funds**.”<sup>45</sup>

Consequently, in a county that has chosen to segregate its funds, recipients of Purpose Area 3 and 4 services do not have to be “needy” families or parents (i.e., they do not have to meet the Colorado TANF criteria of being a “family” unit that contains a dependent child; earns less than \$75,000 in family income, etc.). Please Note: Lawful presence is also a requirement for Purpose Area 3 and 4 service recipients if you are 18 and over. If the county does not segregate its federal TANF and county MOE funds, recipients of services under Purpose Area 3 and 4 must meet the definition of a “needy” family.

### Eligibility for Purpose Area 3

Regardless of whether the county is segregating its funds, services provided under Purpose Area 3 should be reasonably calculated to reduce teen pregnancy or other high risk behavior that contributes to pregnancy. For this reason, service recipients served under Purpose Area 3 should meet some established program criteria, such as a program that serves a specific target population of teen mothers who are trying to complete high school.

*Thus, eligibility under Purpose Area 3 is determined by the need for services in order to prevent out-of-wedlock pregnancies. Eligibility is not limited by income or family situation when the county segregates its federal funds. Broad client eligibility (i.e., not held to the State definition of a needy family) under a Purpose Area 3 program funded with federal TANF funds applies, regardless if the service is offered in a one-on-one format or in a group format (i.e., individual case management versus a teen pregnancy prevention class). However, recipients over the age of 18 must verify lawful presence in order to qualify for services.*

An example of Purpose Area 3 eligible recipients are juniors and seniors attending an alternative high school who participate in an after school mentoring program that provides one-on-one counseling, academic tutoring, and art therapy. Transitioning youth who are 18 and older are eligible for services under this Purpose Area, provided they are at-risk of out-of-wedlock pregnancy or other high risk behaviors that might contribute to out-of-wedlock pregnancy. Purpose Area 3 recipients do not have to meet any federal TANF requirements (i.e., TANF time clock, data reporting, child care assignment and work participation).

### Eligibility for Purpose Area 4

Regardless of whether the county is segregating its funds, services provided under Purpose Area 4 should be reasonably calculated to lead to two parent marriages, sustain marriages, or ensure continued involvement of both

parents in a child's life. For this reason, recipients of services under Purpose Area 4 must be receiving a service that can be reasonably calculated to achieve Purpose Area 4 (encouraging and maintaining a two person marriage).

*Thus, eligibility for Purpose Area 4 is determined by the need for services to support and maintain a marriage and ensure continued involvement of the father in a child's life. Eligibility is not limited by income or family situation when the county segregates its federal funds. However, recipients over the age of 18 must verify lawful presence in order to qualify for services.*

An example of an eligible Purpose Area 4 service recipient is a young father who is attending a promoting fatherhood program to learn how to be more involved and participatory in his son's life or a newly married teen couple who is attending marriage counseling to address the challenges of parenthood and various fiscal strains on their marriage. Transitioning youth who are 18 and older and who are married, already parents, or considering parenthood are eligible for services under this Purpose Area.

## SERVICES & SUPPORTS APPROPRIATE FOR COLORADO TANF

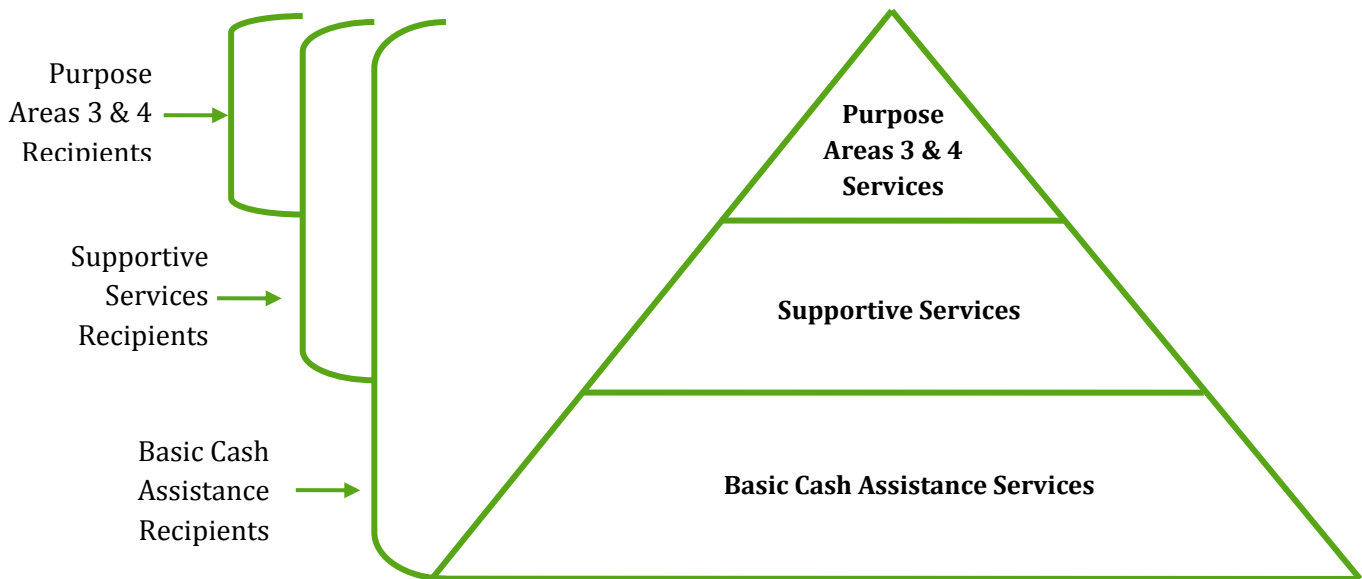
TANF is able to fund many different types of supportive services for families in Colorado. The list included in this guide is not intended to be comprehensive, but is intended to provide more detail than is often available. Each service section includes:

- *Background:* Background information about the service with bulleted lists of how the service could be provided;
- *TANF Purpose:* The purpose areas that the service falls under, using the Purpose Areas outlined in the Purposes of TANF section above;
- *Eligibility:* The eligibility criteria for individuals receiving the services, using the three criteria explained earlier in the section on TANF Eligibility in Colorado; and
- *Other Information:* Examples from here in Colorado and resources as available.

The chart on the next page offers a quick overview of all of the service types included in this guidebook, along with the purpose areas and eligibility. As you use the service sections to identify ways to utilize funding in your county, keep in mind that it is intended as a guide only – it is important to work with your local and state TANF offices as you create new programs to fund through TANF.

### THE TANF SERVICE PYRAMID

The services covered in this guidebook include a spectrum of non-assistance, supportive services that transcend Basic Cash Assistance. However, any Basic Cash Assistance recipient would be eligible for all the supportive services covered in this guide. It is helpful to visualize TANF as a pyramid:



- *Basic Cash Assistance recipients are eligible for any services paid for by TANF.*
- *Families that are eligible for Supportive Services, but not Basic Cash Assistance, are also eligible for any services funded under Purpose Areas 3 & 4.*
- *A general population not eligible for Basic Cash Assistance or supportive services can only access Purpose Areas 3 and 4 services (when paid for through segregated federal TANF funds).*

Service Type	Purpose Areas				Eligibility Levels		
	1	2	3	4	Supp. Services	Purp. 3	Purp. 4
Administrative Costs					N/A		
After School Programs & Camps	✓	✓	✓		✓	✓	
Capacity Building	✓	✓	✓	✓	✓	✓	✓
Case Management	✓	✓	✓	✓	✓	✓	✓
Child Care	✓	✓			✓		
Child Safety & Wellbeing	✓			✓	✓		✓
Community Development		✓			✓		
Computer Purchases & Classes		✓			✓		
Crisis Intervention Services	✓	✓	✓	✓	✓	✓	✓
Debt Repayment and Prevention	✓	✓	✓	✓	✓	✓	✓
Dental Services	✓	✓			✓		
Disability Services	✓	✓	✓	✓	✓	✓	✓
Domestic Violence	✓	✓		✓	✓		✓
Early Childhood Programs		✓			✓		
Emergency Shelter	✓	✓			✓		
Education Services	✓	✓			✓		
Faith-Based & Cultural Services	✓	✓	✓	✓	✓	✓	✓
Family & Youth Leadership Training			✓	✓		✓	✓
Family Planning			✓	✓		✓	✓
Food Banks & Food Assistance	✓				✓		
Foster Care	✓				✓		
Health Education/Promotion			✓	✓		✓	✓
Home Repair & Other Construction	✓				✓		
Home-Based Services	✓	✓	✓	✓	✓	✓	✓
Home Purchase	✓	✓			✓		
Housing & Homelessness	✓	✓	✓	✓	✓	✓	✓
Individual Development Accounts		✓			✓		
Juvenile Delinquency Prevention			✓			✓	
Legal Services	✓	✓			✓		
Life Skills		✓	✓	✓	✓	✓	✓
Mediation	✓	✓	✓	✓	✓	✓	✓
Mental Health & Substance Abuse	✓	✓	✓	✓	✓	✓	✓
Mentoring	✓	✓	✓	✓	✓	✓	✓
Non-Custodial Parents	✓	✓		✓	✓		✓
Outreach & Enrollment in Medicaid	✓	✓			✓		
Parenting Classes	✓		✓	✓	✓	✓	✓
Prenatal Services		✓			✓		
Promoting Marriage			✓	✓		✓	✓



Service Type	Purpose Areas				Eligibility Levels		
	1	2	3	4	Supp. Services	Purp. 3	Purp. 4
Primary Health Care & Medical Services	<i>Can be provided only w/Maintenance of Effort Funds</i>						
Recreational Services/Activities		✓	✓		✓	✓	
Refugee & Legal Immigrant Services	✓	✓	✓	✓	✓	✓	✓
Respite Care	✓			✓	✓		✓
Responsible Fatherhood Initiatives			✓	✓		✓	✓
Seed Funding	✓	✓	✓	✓	✓	✓	✓
Supplementing Family Income/Assets	✓	✓			✓		
Teen Parenting Services	✓	✓		✓	✓		✓
Teen Pregnancy Prevention			✓			✓	
Transportation	✓	✓			✓		
Youth Development	✓	✓	✓		✓	✓	
Vision Services	✓	✓			✓		
Vocational & Employment Placement	✓	✓			✓		

## ADMINISTRATIVE COSTS

Administration and Systems costs can be covered by TANF funds when expense directly relates to managing a TANF program. Under federal rules only 15% of TANF and MOE funds can be spent on administrative costs. Case management, referrals, caseworkers for dual eligible families (child welfare and TANF), and other activities that involve the delivery of direct services do not count toward the 15% limit.<sup>46</sup> This cap does not apply to the use of funding for information technology and computerization for tracking and monitoring purposes.<sup>47</sup>

Eligible administrative expenditures include:

- Eligibility determination
- Program development
- Developing agreements
- Auditing
- Evaluation
- Monitoring
- Training
- Preparing reports
- Indirect costs
- Travel
- Rent
- Supplies (office)<sup>48</sup>

**Purpose Areas:** TANF administration costs can support all four TANF Purpose Areas.

**Eligibility:** Non-applicable. Personnel for TANF programs ensure eligibility of participants based on the purpose area(s) the programs fall under. However, staff members administering TANF programs are not subject to TANF eligibility criteria.

## AFTER SCHOOL PROGRAMS & CAMPS

TANF can support after school programming and summer camps that fit within the purpose areas. When designing an after school program or summer camp, consider whether it is providing any of the following types of services:

- Early childhood programming;
- Faith-based and cultural services;
- Independent living/life skills;

- Recreational services;
- Teen pregnancy prevention;
- Youth development; or
- Other service categories included in this guide.

If the program is providing services that fall into the list above, use the eligibility and purpose area information in those sections. Otherwise, consider whether the program fits into the purpose areas for other reasons.

**Purpose Area:** After school programs and summer camps will generally fall under Purpose Area 3, but could include services that fall under other purpose areas. For example, a program that is providing childcare is appropriate under Purpose Area 1 and 2.

**Eligibility:** Depending on the purpose of the service, after school programs and summer camps can be provided to families that are eligible at the following levels:

- Supportive Services; and
- Purpose Area 3.

If the program is to meet a family's ongoing childcare needs, families receiving the service for more than four months and who are unemployed must be eligible for Basic Cash Assistance.

## CAPACITY BUILDING

TANF funds can be used to build capacity for programs and agencies that provide services that can be reasonably calculated to meet one of the four TANF purposes. The term "building capacity" can apply to a variety of contexts, such as:

- Addressing an agency's infrastructure needs at an agency that specifically meets the needs of TANF eligible individuals and where enhancing the infrastructure will benefit TANF eligible clients;
- Providing training for employees who work with TANF eligible families;
- Upgrading the software or hardware needs of the computer lab of a community based organization that provides computer classes for TANF eligible adults so that they can increase their marketability to potential employers; and/or
- Training TANF eligible adult as child care providers in a community where there is inadequate child care support and there is a market need for trained certified, child care providers.

**Please note:** When TANF is used to specifically support an infrastructure need such as a hardware or software upgrade at an employee training center, costs for that infrastructure expansion or upgrade have to be shared across a number of funding sources and cannot be fully sported with TANF dollars.

**Purpose Area:** Capacity building, depending on the context of its use, can fall under all four of the TANF Purpose Areas.

**Eligibility:** Capacity building efforts can be provided to help organizations better meet the needs of families, youth, and individuals who are eligible at the following levels.

- Supportive Services;
- Purpose Area 3; and
- Purpose Area 4

**More Information:** An example of an innovative capacity building program that is funded through TANF includes:

- The Ohio Department of Human Services provided TANF funding for a pilot program of The Literacy Cooperative of Greater Cleveland that strives to improve the literacy skills of out-of-school youth and pregnant or parenting young adults through increasing literacy program capacity. The Literacy Cooperative sub-granted TANF funds out to five projects to participate in a pilot aimed at building the capacity of organizations offering literacy services. The participating organizations received: capacity building support through a team of consultants and partners with expertise in program assessment, literacy content and instruction, data tracking and evaluation, and marketing and fundraising; and organizational stipends to support active participation in and prioritization of this work, including costs associated with implementing new standards, training of instructors, recruitment, tracking learner gains, learner incentives, evaluation and accountability, and transition strategies.<sup>49</sup>

## CASE MANAGEMENT

Although activities such as eligibility determination, monitoring, and tracking are administrative expenses, case management is a program expenditure. Case management is defined by the federal government as including information, referral, and counseling activities.<sup>50</sup>

**Purpose Areas:** The purpose area of case management is dependent on the reason case management is provided and how it connects with other services that are part of the program. For example, case management to connect families with employment services to improve self-sufficiency would fall under Purpose Area 2. Case management to connect families with marital counseling, parenting classes, and mediation services would fall under Purpose Area 4.

**Eligibility:** Depending on the Purpose Area of the service, case management can be provided to families at a variety of eligibility levels including:

- Supportive Services;
- Purpose Area 3; and/or
- Purpose Area 4.

## CHILD CARE

TANF funds can be used to cover the cost of child care or child care related services and activities. Counties have a lot of flexibility in how they use TANF funds to provide child care assistance to families. The Child Care and Development Block Grant, the main source of child care funding for TANF families, serves only one eligible child in seven.<sup>51</sup> Local County Departments of Social Services/Human Services are increasingly utilizing TANF to directly support the child care costs of low-income families.

Examples of appropriate Child Care expenditures under TANF include:<sup>52</sup>

- Transferring Federal TANF funds into the Child Care and Development Fund to support "quality activities," e.g., to help child care providers attain accreditation and increase monitoring and unannounced inspections of child care settings;
- Counseling needy parents about health, safety, educational, social, and emotional development issues to consider in selecting child care;

- Providing full-day/full-year high quality child care services for young children in needy families by expanding or extending the hours of programs with high educational and developmental standards, such as Head Start and accredited pre-kindergarten;
- Increasing child care subsidy levels, especially for infant and toddler care, to expand the availability of care for needy families;
- Increasing child care payment rates for child care offered during non-traditional hours in order to expand the availability of such care;
- Expanding child care staff recruitment activities to increase the availability of care for needy families, especially in areas of short supply such as care for children with special needs, sick-child care, care in rural areas, and care during non-traditional work hours; and
- Funding after-school and summer recreation activities that provide supervision and developmental services for children and youth while their needy parents work.

For TANF families or families transitioning from TANF who are paying for their own child care, case managers may want to connect them to the Child and Dependent Care Tax Credit (DCTC). DCTC is a tax credit for parents (married, divorced or single) who, in order to work or pursue work, pay for child care services for children under age 13. This is different from TANF funding programs directly providing child care services, as it is an incentive that applies to families who are purchasing their own child care services. DCTC will refund from 20 – 35% of qualifying expenses for families, with the amount dependent on adjusted gross income and total cost of work-related child care expenses paid to a provider.<sup>53</sup>

**Purpose Area:** Child care related services for families and individuals primarily fall under Purpose Areas 1 and 2.

**Eligibility:** Child care services can be provided to families at one eligibility level:

- Supportive Services.

It is important to note that child care can be viewed as either an assistance service or a non-assistance service. This affects how long the service can be provided to a family at the Supportive Services level.

- Child care is non-assistance for employed persons, even when provided during non-work activities, e.g., education/training.
- Child care is assistance for non-employed persons unless it is a non-recurrent, short-term benefit (e.g. during job search) and designed to deal with a specific crisis situation or episode of need; not intended to meet recurrent or ongoing needs; and will not extend beyond four months.<sup>54</sup> Child care for unemployed participants is often paid for from the childcare block grants rather than TANF.<sup>55</sup> However, TANF can pay directly for child care services. *Please Note: As discussed earlier, while the above categorization is a basic federal stipulation—there will be cases where childcare in the form of after school programs, etc. provided through a community-based organization with a TANF contract and eligible to the broader public can be accessed as a non-assistance service for an unemployed family (i.e., the family does not have to fill out a TANF application and TANF requirements such as the TANF clock and signing an IRC do not apply).*

**More Information:** Example county-level child care programs include:<sup>56</sup>

- “To support working parents, Cheyenne County used its TANF funds to help open a child care center for low-income individuals. The center also offers training opportunities for individuals on Colorado Works, who work in the center to learn valuable job skills.”

- “Following the closure of a major child care provider in Garfield County, the Garfield Department of Social Services worked with other community groups and used TANF funds to invest in a new child care center that provides free and reduced-cost child care.”

**Additional Resources:** The following report is a helpful resource for any program administrators who wish to expand child care support services in their communities with the support of TANF funding:

- The Center for Law and Social Policy’s *Using TANF for Child Care: A Technical Guide*. Available at: <http://www.clasp.org/admin/site/publications/files/0075.pdf>

## CHILD SAFETY AND WELLBEING

TANF funds can be used to support general child safety and wellbeing services and activities. Child safety and wellbeing covers a broad spectrum of services and is typically the jurisdiction of Child Welfare offices. However, child safety and wellbeing issues impact a high percentage of TANF eligible families and Divisions of Child Welfare often work in partnership with TANF administrators to ensure families have the support they need to keep their children safe and healthy.

Examples of appropriate child safety and wellbeing expenditures under TANF include:<sup>57</sup>

- Providing parenting classes, premarital and marriage counseling and mediation services;
- Providing home visits or other programs for new or expecting parent(s) focused on child development, parent skills, child health, and healthy family functioning;
- Providing crisis intervention services;
- Providing initiatives and programs to promote responsible fatherhood and increase the capacity for fathers to be emotionally and financially involved in the life/lives of their child(ren);
- Collaborating with child welfare to provide services to families that will assist in keeping the child in the home or with a relative; and
- Using funds to assist dual-eligible families – TANF eligible clients who also have open Child Welfare cases.

**Purpose Area:** Child safety and wellbeing services primarily fall under Purpose Area 1, but could also be appropriate for Purpose Area 4 if they include services to improve and sustain the parent’s marriage or engage the father in the child’s life.

**Eligibility:** Depending on the purpose of the service, child safety and wellbeing services can be provided to families that are eligible at the following levels:

- Supportive Services; and
- Purpose Area 4.

Child safety and wellbeing services are not assistance, and thus can be provided to families eligible at the Supportive Services level for longer than four months.

**More Information:** TANF emphasizes the importance of family preservation as a contributing factor in child safety and wellbeing. Numerous family preservation programs are offered in communities across Colorado with services such as basic parenting skills and behavior interventions for families where the children are at risk of out-of-home placement. In addition, the Colorado State Plan for TANF includes a provision for a Family Preservation Program:

“This program utilizes segregated federal TANF funds to provide services to families where the children are at risk of out-of-home placement. Services are designed to ensure that children can be cared for in their own homes or in the homes of caretaker relatives, and include case planning, case management, counseling, family support programs, intensive family therapy, day treatment, home-based services, non-medical drug and alcohol treatment, and crisis intervention services.”<sup>58</sup>

Families participating in CDHS’ Family Preservation Program have to meet the Colorado state definition of a “needy” family and have to sign a treatment plan.

**Additional Resources:** The following report is a helpful resource for any program administrators who wish to expand child safety and wellbeing services in partnership with Divisions of Child Welfare.

- *Working Together for Children and Families: Where TANF and Child Welfare Meet.*
  - [http://peerta.acf.hhs.gov/uploadedFiles/working\\_together.pdf](http://peerta.acf.hhs.gov/uploadedFiles/working_together.pdf)

## COMMUNITY DEVELOPMENT

The U.S. Department of Health and Human Services specifically mentions community development as an appropriate use of TANF funds. Effective community development can promote economic self-sufficiency by increasing opportunities for low income TANF eligible families to access jobs in their communities. TANF and MOE funds can be used creatively to improve and transform an economically challenged neighborhood and increase local employment opportunities.

“Community Development Centers (CDC) and Economic Development Programs (EDP), in addition to coordinating neighborhood revitalization efforts, play an important role in attracting jobs to local communities and providing job training, job placement, and support services. These programs typically assist populations similar to those served by the Temporary Assistance for Needy Families (TANF) program and usually operate in urban cores and rural counties, areas where TANF caseloads are concentrated.”<sup>59</sup>

Strategies that contribute to community development include:

- Providing grants to welfare planning councils for addressing recipient needs within a specific local area;
- Supporting a neighborhood revitalization effort that results in additional jobs in the construction field and increased affordable housing options in the community;
- Providing loans to local small businesses that hire and train TANF recipients;
- Funding local microenterprise efforts and encouraging the creation and use of individual development accounts to support microenterprise development;
- Funding local organizations or community development corporations that employ TANF recipients by covering a share of the planning and development financing; and
- Providing subsidized work or wage support, in conjunction with economic development funds, to CDCs involved in a project’s physical development.<sup>60</sup>

**Purpose Area:** Community development primarily falls under Purpose Area 2, as it helps to create jobs in the community. Depending on the program design, it could potentially be appropriate for other Purpose Areas.



**Eligibility:** Most services provided under community development would be non-assistance services and would utilize the Supportive Services eligibility level. Some community development services may fall under Purpose Areas 3 and 4 (i.e., a family planning class offered in the local Community Development Center or a youth job skills class that is open to the general public). These relevant TANF services do not have to be for needy families.

**More Information:** Community development partners may have less experience with client eligibility than other contractors. For this reason, it is important that the county works with the CDC or EDC to make sure they thoroughly understand TANF eligibility requirements. In addition, a contract should be developed that clearly specifies the contract period, client eligibility requirements, how eligibility will be documented, client payment structure, performance measures to track, and guidelines for invoicing and reporting.

## COMPUTER PURCHASES AND CLASSES

Federal TANF guides explicitly recognize that familiarity with computers and the Internet enhances employability for many jobs. Additionally, the Internet can be a critical source of information about employment and training opportunities. For these reasons, local counties can use their TANF funding to:<sup>61</sup>

- Purchase computers;
- Provide training; and
- Cover the cost of internet.

**Purpose Area:** Computer purchase and classes fall under Purpose Area 2.<sup>62</sup>

**Eligibility:** Computer purchase and classes can be provided to families that are eligible at the following level:

- Supportive Services.

## CRISIS INTERVENTION SERVICES

TANF funds can be used to support Crisis Intervention Services including a broad array of services intended to immediately address a crisis situation (i.e., domestic violence, child abuse, impending homelessness, or legal issues) that put a family's safety and stability at risk.

Eligible crisis intervention services that can be funded by TANF include:

- Assessment, case management, and short-term services for families and children affected by a crisis situation such as an incident of domestic violence;
- Making referrals to appropriate partners;
- Following up on referrals and the status of the emergency;
- Joint planning and follow-up with the client and partners; and
- Crisis support related to mental illness.

**Purpose Area:** Crisis intervention services cover a broad array of programming and could fall under all 4 purpose areas. Crisis intervention services are certainly applicable to keeping a family in their home under Purpose Area 1; if they eliminate a key barrier to unemployment such as domestic violence, it could reduce the dependence of a family on public assistance (Purpose Area 2). Crisis intervention can be part of the array of services offered to teenagers at higher risk of teen pregnancy (although this would be far less common than the other purpose areas) and fall under Purpose Area 3. If a crisis intervention service contributes to the maintenance of a marriage, it would fit under Purpose Area 4.



**Eligibility:** Depending on the purpose of the service, crisis intervention services can be provided to families that are eligible at the following levels:

- Supportive Services;
- Purpose Area 3; and
- Purpose Area 4.

Crisis Intervention Services would not be considered ongoing “assistance” services because they would be categorized as “non-recurrent, short-term benefits, which: (1) are designed to deal with a specific crisis situation or episode of need; (2) are not intended to meet recurrent or ongoing needs; and (3) will not extend beyond four months.”<sup>63</sup> Thus, while crisis intervention services can be provided to families at the Supportive Services eligibility level, they would typically not be provided for more than four months.

**More Information:** Often crisis intervention services will be contracted out from a county TANF agency to non-profit community partners. For example:

- Denver Department of Social Services contracts out TANF funds for crisis intervention services specifically in the area of domestic violence from Project Safe Guard (a nonprofit that addresses domestic violence) and in the area of mental health support from Project Wise (a nonprofit that provides support for individuals and families addressing mental health challenges).
- Some states issue TANF payments or vouchers to families that are specifically defined as a crisis intervention payment such as Georgia’s Crisis Intervention Services Payment (CRISP).

## DEBT REPAYMENT AND PREVENTION

There are two contexts where TANF funds can be used to support debt repayment services. TANF funds can be used to support a periodic or onetime expense for debt counseling classes or case management around fiscal management. More commonly, TANF funds can also be used to pay a benefit to noncustodial parents in order to pay off their child support arrearages. A county may also choose to waive child support debt owed to the state by a noncustodial parent, but it may not use TANF funding to reimburse itself for the debt. “The state may use TANF or MOE funds to pay all or part of the child support debt owed to the custodial family by: directly paying off the arrearage in the form of a child support payment; or by paying a benefit to a custodial parent that the custodial parent accepts in lieu of unpaid child support owed to the family.”<sup>64</sup>

If other types of debt are affecting a family’s ability to care for the child in the home or remain employed, counties can also choose to help the family resolve those debts. A common approach to debt repayment is to mandate that the parent (custodial or noncustodial) participate in specific employment, training, and other activities in exchange for the debt repayment.

**Purpose Area:** Debt repayment falls under Purpose Areas 1 and 2. Debt counseling services could fall under Purpose Area 4, similar to other educational services on financial skills. Debt prevention and management classes may also be provided as one of an array of services provided to teenagers at risk of early parenting and therefore fall under Purpose Area 3.

**Eligibility:** Debt repayment services are only appropriate for families who are eligible at the following level:

- Supportive Services.

This applies to both the custodial and non-custodial parents, as debt reduction is only appropriate for “needy” families.<sup>65</sup> Debt repayment is only appropriate for families at the Supportive Services level if they are short-term and non-reoccurring.

Debt *counseling services* are appropriate for families eligible at the following levels:

- Supportive Services;
- Purpose Area 3; and
- Purpose Area 4.

## DENTAL SERVICES

Federal TANF funds can be used for specific dental services such as dentures, crowns, tooth extractions, fillings, etc. Dental services can improve an individual’s or child’s general health. They are also considered a strategy for assisting low-income adults to gain employment. TANF can only cover dental expenses if they are not covered by State Medicaid or an alternative form of health insurance. Prior to covering dental expenses, the TANF agency should ask for proof that the requested dental service is not covered by a health care plan.

Local or state TANF offices can put a cap on the amount of funds they are willing to use to support one individual’s or child’s dental care (for example, Jefferson County Department of Human Services and Maine’s TANF program cap their dental support at \$2,000 and Oklahoma caps dental support at \$2,500).

Many TANF families in economically destitute urban, suburban and rural areas have challenges simply finding an affordable dental provider. As a result, TANF funds have also been used to support dental programs specifically for low income TANF eligible families in provider scarce communities.

**Purpose Area:** Dental services fall under Purpose Areas 1 and 2.

**Eligibility:** Dental services can be provided to families that are eligible at the following level:

- Supportive Services.

Dental services could be provided on an ongoing basis as a supportive service to families receiving Basic Cash Assistance or to any families that meet the state definition of “needy” and whose non-cosmetic dental needs are not covered by State Medicaid or an alternative form of health insurance.

**More Information:** Dental services are being paid for by TANF in some Colorado counties and in other states. For example:

- Jefferson County Department of Human Services has identified dental services as an eligible TANF funded service that it provides to needy families.
- Multiple states from West Virginia to Oklahoma consider dental services appropriate for TANF funding if they are not already covered through a health care plan such as Medicaid.

## DISABILITY SERVICES

TANF funds can be used to support low-income individuals and families with disabilities. Transitioning families and individuals to self-sufficiency through employment is a more complex process when a TANF eligible family has a child or family member with a disability. A substantially higher proportion of TANF recipients report physical and mental impairments as compared to non-TANF populations. Additionally, many TANF families have children

with disabilities. The TANF work requirements and lifetime limits to benefits can present challenges for state and local TANF agencies in addressing the unique needs of families with a disability who are TANF beneficiaries.<sup>66</sup>

The types of services and supports that families with a member with a disability need in order to succeed are often intensive, individualized, long-term, and more costly than the services other families need.<sup>67</sup> Local government administrators need to address these factors in developing effective strategies to help transition families and individuals with disabilities to self-sufficiency.

Colorado's State TANF plan acknowledges that a disability may present an ongoing barrier to self-sufficiency and provides guidance to program administrators working with families with disabilities. The plan stipulates the use of an assessment in determining barriers to self-sufficiency such as mental and physical disabilities. "Reasonable accommodations to address these barriers will be included in the Individual Responsibility Contract that is developed as a result of this assessment."<sup>68</sup> The Colorado State plan also includes additional work definitions and exceptions for individuals and families with disabilities under eligible work activities, which include employment, training, and education.

Options for using TANF funds to support individuals and families with disabilities include:

- "Arranging for the State's vocational rehabilitation agency or similar provider to provide assessment, evaluation, assistive technology and equipment, and vocational rehabilitation services to needy individuals who have physical or mental disabilities, but would not otherwise receive services (Such services may also be important to parents or caretakers who receive SSI, while their children receive TANF.);
- Providing cash assistance during the waiting period for SSI benefits for a disabled parent or disabled child in the family;"<sup>69</sup>
- Paying for Assistive Technology for people with disabilities. Assistive technologies use technology to make it easier for people with disabilities to live their lives independently and can include telecommunication devices for the deaf, electronic wheelchairs, screen magnifiers, etc.; and
- Systems Navigators who specifically assist individuals with disabilities navigate barriers to employment or access support and resources.

*Supplementary Security Income (SSI)* is a program that provides monthly benefits to adults with limited income and resources who are disabled, blind, or age 65 or older and blind or disabled children. The Program is administered by the Social Security Administration and allocated to the states where it is managed by county departments of social services/human services. It is important for TANF Program Administrators and Case Managers to know about Supplementary Security Income because:

"Families who qualify for SSI would receive a greater amount of income support than they would through TANF. They would also receive services and supports more closely tailored to the needs presented by their individual disability. Disabilities covered by SSI include physical and mental disabilities as well as some severe forms of mental illness."<sup>70</sup>

The challenge of SSI for many eligible recipients is that program is complicated to navigate and has strict eligibility guidelines. An eligible family should be matched with an experienced and knowledgeable case manager who can help them understand the eligibility requirements and apply for the program. "If funds are spent supporting a family with basic assistance and/or services and the family is eventually found eligible for SSI, the funds spent can be reimbursed to the state's TANF program when the family transitions to SSI."<sup>71</sup>

**Purpose Area:** Adapting services to fit the needs of families and individuals with disabilities could occur under any purpose area. The services provided would have to be assessed on an individual basis to determine which Purpose Area they best qualify under.

**Eligibility:** Depending on the purpose of the service, support related to a family member's disability can be provided to families that are eligible at the following levels:

- Supportive Services;
- Purpose Area 3; and
- Purpose Area 4.

Disability services fall within TANF's non-assistance category. It is important to note that if a family or individual with a disability is receiving assistance, extensions beyond the 60-month time limitation for receipt of TANF assistance benefits may be granted in recognition that disabilities can be barriers to employment. This extension applies in cases where the disability impacts the "caretaker relative, his/her spouse, the dependent children, or immediate relative for which the caretaker is the primary caregiver."<sup>72</sup>

**More Information:** Colorado has specialized programs and additional sources of funding support to assist individuals and families with disabilities. *The Early Intervention Program for Infants and Toddlers with Disabilities* provides grants to all the states and territories based on a statutory formula. At the local level, funding is used for direct services that are not otherwise available, specifically including specialized instruction, speech therapy, occupational therapy, physical therapy, and psychological services to support the family. These can include family training and counseling. The intent is to ensure early intervention services for disabled infants and toddlers.<sup>73</sup>

As services to disabled infants and toddlers aid TANF families in being available for work and employment activities, the program can be a critical support. Program Administrators working with TANF families who have infants and toddlers with disabilities should put the family in touch with the Early Intervention Program Coordinator in their community. Contacts for Colorado Early Intervention Coordinators (based on county or region) can be found at: <http://www.eicolorado.org/index.cfm?fuseaction=contactus.main&CCBID=12>

**Additional Resources:** The following report is a great resource for program administrators working with TANF eligible families and individuals with disabilities:

Mathematic Policy Research's Assisting TANF Recipients Living with Disabilities to Obtain and Maintain Employment.

[http://www.acf.hhs.gov/programs/opre/welfare\\_employ/identify\\_promise\\_prac/reports/tanf\\_final\\_report/tanf\\_final\\_report.pdf](http://www.acf.hhs.gov/programs/opre/welfare_employ/identify_promise_prac/reports/tanf_final_report/tanf_final_report.pdf)

## DOMESTIC VIOLENCE

Some studies have found that over half of the women receiving public assistance have reported being battered.<sup>74</sup> Often domestic violence is a barrier to sustaining the employment requirements for families receiving TANF Basic Cash Assistance. A 1999 study of Colorado welfare mothers by the Center for Policy Research found that 44% were prevented from working by abusive ex-partners.<sup>75</sup> Responding to these concerns, the Family Violence Option (FVO) allows Colorado counties to screen and assess for domestic violence, offer domestic violence services, and grant waivers from Temporary Assistance for Needy Families (TANF) requirements when such requirements would endanger an individual client. Through the Family Violence Option, clients may be eligible to receive

referrals for counseling or other mental health services, exemptions from required work activities, and/or extensions of the 60-month TANF time limit.<sup>76</sup>

Eligible domestic violence services include but are not limited to:

- Use of TANF or MOE funds to help victims of domestic violence relocate somewhere else in the State or outside the State where employment or safe housing has been secured;
- Collaboration with domestic violence service providers to screen and identify victims; develop safety and services plans; provide appropriate counseling, referrals, and other related services; determine the need for waivers of TANF program requirements; establish procedures that will maintain confidentiality of case-record information and ensure safety; and develop appropriate staff training;<sup>77</sup>
- Building a jungle gym at a domestic violence shelter;
- Paying for soft skills training (personal attributes that enhance an individual's interactions, job performance and career prospects<sup>78</sup>) for mothers impacted by domestic violence who are seeking employment; and
- Paying to transport mothers impacted by domestic violence to work force centers so that they can conduct job searches.

Case managers working with families have to be well trained to identify domestic violence in the home and ensure that families experiencing domestic violence can access a work waiver as needed. In addition, families receiving assistance are subject to time limits and data reporting (which may jeopardize a family's safety). The case manager should work with the family to ensure their personal identifying information is protected and that the TANF time limit regulations are waived if needed.

**Purpose Area:** Services for victims of domestic violence can fall under Purpose Areas 1, 2, or 4, depending on the reason for the services. For example, if the domestic violence services are provided to ensure children can remain in the home, it would fall under Purpose Area 1. If domestic violence in the home is interfering with a parent's ability to maintain employment, the services would be appropriate under Purpose Area 2. If the domestic violence services are intended to help ensure a father is more participatory in contributing to the economic wellbeing of his children, they would fall under Purpose Area 4. Please Note: Services that would fall under Purpose Area 4 should be monitored to ensure the victim(s) of abuse are not at risk and reunification services are not recommended except in cases where the perpetrator has received treatment and has demonstrated behavior change over a significant period of time.

**Eligibility:** Depending on the purpose of the service, domestic violence services can be provided to families that are eligible at the following levels:

- Supportive Services; and
- Purpose Area 4.

Domestic violence services are not assistance, and can be provided to eligible families in a diversion format (to meet a non-recurrent, short term need) or in a longer term supportive services format (i.e., ongoing case management and counseling for families impacted by domestic violence).

**Additional Resources:** The Colorado Coalition Against Domestic Violence is an umbrella organization that provides a comprehensive array for domestic violence related technical assistance and training services. Their website can be accessed at <http://www.ccadv.org/>

## EARLY CHILDHOOD PROGRAMS

The Federal Administration of Health and Human Services recognizes the positive impact an effective early childhood program can have on a child's long-term academic achievement as well as their cognitive, social and emotional development. This is reflected in the Federal TANF regulations, which state the TANF funds can be used to support and expand a broad range of child care,<sup>79</sup> pre-kindergarten, kindergarten, and other early educational costs under Purposes 3 and 4, provided these activities are not part of the State's general free educational system.<sup>80</sup> Examples of appropriate early childhood program expenditures under TANF include:

- Expanding Head Start services;
- Providing early childhood development programs;
- Expanding pre-kindergarten programs;
- Expanding home visitation programs aimed at improving parenting skills, child health, and child development for at-risk new parents;
- Supporting early childhood initiatives that promote the health, learning, and safety of children from birth to three years of age;
- Funding a collaboration with an Early Head Start program to provide resources and technical assistance to develop a full-day/full-year head start program;<sup>81</sup> and
- Supporting a preschool initiative to provide supportive services to income eligible families with four-year-old children.

**Purpose Area:** Early Childhood Programs fall under Purpose Area 2, as they are a higher quality means for child care services that incorporate educational programming.

**Eligibility:** Early childhood programs can be provided to families that are eligible at the following level:

- Supportive Services.

If the family is employed, early childhood programs are not assistance, and thus can be provided to families eligible at the Supportive Services level for longer than four months. There may also be scenarios where unemployed families access an early childhood program through a community based organization that is providing the program to a broader population in which case the unemployed family would not have to fill out a TANF application and thus the early childhood program would not be categorized as assistance and evoke the TANF clock, an IRC, etc.

**More Information:** A number of Colorado Counties have used TANF funds to expand early childhood programs in their communities. For example:

- "Eagle County uses TANF funds to place caseworkers in the county's alternative high school. The caseworkers work with teenage parents to focus on parenting, child development, education, employment, and high school completion. Teens receiving services from this program do not need to be on the TANF caseload, and the program collaborates with the local community college to provide services to additional students not attending the alternative high school."<sup>82</sup>

**Additional Resources:** The following report is a helpful resource for any program administrators who wish to expand early childhood programs in their communities with the support of TANF funding:

- The Center for Law and Social Policy's report, *Using TANF for Early Childhood Programs*.  
<http://www.clasp.org/admin/site/publications/files/0293.pdf>



## EMERGENCY SHELTER

TANF is used with increasing frequency to fund homeless programs, which include an array of services from subsidized housing to emergency shelter. While ideally the support in this area is geared towards keeping families in their current homes through subsidized rental and or mortgage assistance, it can also be used to cover emergency shelter, particularly in cases of domestic violence.

In the context of emergency shelter, TANF could be utilized in two ways – for individual unit support and for programmatic support. The more common approach is to provide payment or vouchers for families for stays in motels (i.e., for a women and her children’s motel stay if they are fleeing an abuser) to ensure that they do not end up homeless.

Emergency shelter in the context of a motel stay is typically a short term arrangement (maximum of four months) and, as a result, is not considered basic assistance and does not trigger the requirements that accompany Basic Cash Assistance. In addition, as long as the emergency shelter support is offered with the clear understanding that it is not an ongoing support, it can be offered more than once in a twelve month period or a different form of support can be offered to the same family in that twelve month period. For example, a family that receives a motel voucher for one month could also receive utility support when they are living in a rented apartment three months later.

**Purpose Area:** Services for families in need of emergency housing/shelter fall under Purpose Areas 1 and 2. These two purposes deal with existing poverty and dependency and are intended to ameliorate and reduce dependency of families already in need of public assistance.<sup>83</sup> While emergency shelter does not address long-term self-sufficiency, it may be necessary to address prior to engaging a family in other services that can promote long-term improved outcomes.

**Eligibility:** Emergency shelter can be provided to families that are eligible at the following level:

- Supportive Services.

If provided as a short-term, non-recurrent service of less than four months, emergency housing services could be appropriate for Supportive Services eligible families (and, of course families who would meet the eligibility for Basic Cash Assistance). If housing support is provided as an ongoing, long term service, the families must be Basic Cash Assistance eligible.

## EDUCATION SERVICES

While TANF can be used to support education, it is important to note that there are specific restrictions in how TANF funds can be applied to support educational activities.<sup>84</sup>

“Participation in vocational certificate and Associate degree programs, as well as in non-credit vocational education, can count toward the first 20 hours of required TANF work hours as “vocational educational training,” as long as the programs prepare individuals for employment in current or emerging occupations. However, the regulatory definition of vocational educational training explicitly rules out postsecondary education that directly results in a baccalaureate or advanced degree. (HHS has stated that such activities can be counted as job skills training, if directly related to employment. However, to be counted as such, hours in postsecondary education must be combined with 20 hours per week of a core work activity.)”<sup>85</sup>

Examples of education activities that can count toward meeting a state’s work participation include:

- “Engaging in vocational educational training for a period not to exceed 12 months; and



- For single teen heads of household or married teens, either maintaining satisfactory attendance in secondary school or participating in education that is directly related to employment if they have not received a high school diploma or a certificate of high school equivalency.”<sup>86</sup>

Participation in a range of education-related activities may also count toward the work participation rates after the first 20 hours of work per week under the all-families rate, or 30 hours per week for the two-parent families’ rate. Activities that may count for these additional hours include:

- “Education directly related to employment, in the case of a recipient who has not received a high school diploma or a certificate of high school equivalency; or
- Satisfactory attendance at secondary school or in a course of study leading to a certificate of general equivalence if a recipient who has not completed secondary school or received such a certificate.”<sup>87</sup>

TANF funds can also be used to cover one-time or short-term expenses that support the skill building of low-income families. They include such things as:

- “Funding education or job training activities at colleges and secondary and technical schools that promote advancement to higher paying jobs and self-sufficiency;
- Testing Fees/GED Fees (Pretest and Program);
- Tutoring fees;
- Tuition and fee support (for a limited period of time such as a semester);
- Uniforms;
- Assisting a parent to pay for a special education class for their child (e.g., a science preparatory class offered over the summer);
- Supplementing work study programs, helping the participants to stay in school past the 12 month limit while meeting work requirements; and
- Other one-time expenses that lead to education, skill building, and vocational skills development.<sup>88</sup>

**Purpose Area:** Education support primarily falls under Purpose Areas 1 and 2.

**Eligibility:** Education support is primarily appropriate for families that are eligible at the following level:

- Supportive Services.

**Additional Resources:** The following report is a helpful resource for any program administrators who wish to expand educational programs in their communities with the support of TANF funding:

- The Center for Law and Social Policy’s report, *Improving Access to Education and Training for TANF Participants*. <http://www.clasp.org/admin/site/publications/files/0363.pdf>

## FAITH-BASED AND CULTURAL SERVICES

Sometimes helping families achieve self-sufficiency requires services that are culturally specific to the family’s background. This is particularly true with hard to serve populations who have traditionally failed to succeed in mainstream service delivery systems. While faith-based and cultural services are not technically a category of service, they provide a means of delivering a range of TANF relevant services. Counties can contract with a faith-based organization for any of the array of services that they would contract with any other community-based provider. Faith-based and cultural services may fall outside the usual set of service delivery providers working with a local TANF office. However, providing services within the cultural context of a family can improve

outcomes.<sup>89</sup> Faith-based and culturally specific services can also fill gaps in the service array of a community, particularly around odd-hours services and volunteer-based services like mentoring.

When determining whether a faith-based or culturally specific service is appropriate for TANF funding, the criteria should be the same as any other service: does it fit within one of the four TANF Purpose Areas, and if so, is it for someone who is eligible under that Purpose Area? Examples of services that would be appropriate in a faith-based and culturally specific setting include:

- Linguistically and culturally appropriate case management;
- Linguistically and culturally appropriate counseling services;
- Housing and homelessness services;
- Family mentoring;
- Youth mentoring;
- Holiday items;
- Food/food banks;
- Crisis response services; and
- Interviewing clothing/coaching.

The following paragraphs are intended to provide guidance for program administrators interested in utilizing TANF funds for faith-based and cultural services.

*Faith-Based Services:* While TANF cannot be used to directly support the operational functioning of a faith-based organization such as Catholic Charities, funds could be used to support a program of Catholic Charities that provides general case management and substance abuse support for “needy” families as long as 1) the organization does not discriminate in who they will serve, and 2) a viable, equitable choice exists for families who would prefer not to receive services through a faith organization.

*Cultural Services:* While TANF funds may not be used to directly support a program focused solely on a cultural community, services provided by a culturally relevant provider are appropriate for TANF. For example, case management and counseling might be best provided through a local Asian community association, if language and cultural barriers would otherwise make the services difficult to provide directly through TANF agencies or mental health providers. TANF can also be used to “pay refugee service providers to provide linguistically and culturally appropriate services that help refugee TANF recipients obtain employment or participate in work activities.”<sup>90</sup>

**Purpose Area:** Faith-based and cultural services must meet one of the four TANF purpose areas. For example, a faith-based entity providing child care to unemployed families so they can seek employment would meet Purpose Area 1, while a program that provides culturally appropriate family planning classes to refugee teenagers would fall under Purpose Area 3.

**Eligibility:** Depending on the purpose of the service, faith-based and culturally specific services can be provided to families that are eligible at the following levels:

- Supportive Services;
- Purpose Area 3; and
- Purpose Area 4.

Faith-based and cultural services are often not considered assistance, though it depends on the specific service being offered (i.e., shelter in a specific context would certainly be considered a basic needs).

**More Information:** Recognizing that some individuals may not wish to seek help from the Department of Social Services, some counties have set up contracts with local faith-based groups to provide services using TANF funds, for example:

- Rio Grande’s job preparation facility in Del Norte, a program run by a faith-based provider that offers training, education, and guidance for clients with barriers including criminal records and family problems;
- Prowers County’s Ministerial Alliance, a program that provides food assistance, short-term emergency medical assistance, shelter, and utility support; and
- Pagosa Outreach Connection in Pagosa Springs, in which the County Department of Human Services, local churches, and other community organizations partner to offer financial assistance, food, gas vouchers, and medical assistance for low-income families.<sup>91</sup>

## FAMILY AND YOUTH LEADERSHIP TRAINING

Family Leadership Training provides families with the skills to advocate for their needs and the needs of their family. Additionally, family leaders can become advocates for other families and participate in systems change at all levels, from supporting individual families through participating on governance councils. Leadership skills will help families to advocate for changes in programs and systems and promote community capacity to empower family members to participate on committees, advisory boards and in peer-to-peer mentor roles.

Similarly, Youth Leadership Training provides direct benefit to youth, by developing their self-esteem and self-awareness, as well as for the community, by preparing youth to participate in shaping their community and advocating for other youth. Example family and youth leadership training programs include:

- Family Leadership Training Institute, a statewide project lead by the Colorado Department of Public Health and Environment;
- Parent Professional Partners, a training model available periodically that develops skills for parents and staff to work together in partnership;
- Family advocacy training associated with High Fidelity Wraparound, which utilizes Family Support Partners as a key component to supporting families with complex needs; and
- Youth leadership training using a positive youth development model, such as the youth leadership opportunity offered through Youth Partnership for Health, a state level board of youth leaders advising the Colorado Department of Public Health and Environment.

**Purpose Area:** Family and youth leadership training fits best under Purpose Areas 3 and 4.

**Eligibility:** Family and youth leadership training can be provided to families and youth who are eligible at the following levels:

- Purpose Area 3; and
- Purpose Area 4.

**Additional Resources:** The following report is a helpful resource for exploring how youth leadership can be included in a TANF funded program:

- The Center for Law and Social Policy’s report, *Tapping TANF for Youth: When and How Welfare Funds Can Support Youth Development, Education and Employment Initiatives*.  
<http://www.policyarchive.org/handle/10207/bitstreams/14042.pdf>

## FAMILY PLANNING

Although primary health expenses are not appropriate for TANF funding, federal TANF funds can be utilized to support family planning services not available through Medicaid.<sup>92</sup> They must be pre-pregnancy family planning services to be eligible for funding.<sup>93</sup> In addition to family planning services, TANF can fund contraceptive access and information related services, such as promoting contraceptive use through clinic-based family planning services, public information campaigns, and targeted community awareness programs.

**Purpose Area:** Family planning services cover a broad spectrum of programming and could fall under Purpose Areas 3 and 4.

**Eligibility:** Family planning services can be provided to families that are eligible at the following levels:

- Purpose Areas 3; and
- Purpose Area 4.

## FOOD BANKS AND FOOD ASSISTANCE

While long-term food assistance for low income families is primarily provided through the Supplemental Nutrition Assistance Program (SNAP), TANF can be used to provide additional funds to food banks and their partner agencies (pantries, shelters, soup kitchens, etc.) that assist low-income families. Providing additional funding to food banks increases their capacity to serve more families and assists families in meeting their basic needs.

*Colorado's Transitional Supplemental Nutrition Assistance Program (SNAP)* provides transitional food stamps for families that leave TANF as a result of increased earnings. TANF families that receive County Diversion assistance, State Diversion assistance, or TANF Cash Assistance are automatically categorically eligible for food stamps. Counties can provide up to five months of traditional food stamps to families leaving welfare without families reapplying or submitting additional paperwork.<sup>94</sup> Eligibility is limited to families that leave cash assistance or diversion without sanctions.<sup>95</sup>

**Purpose Area:** Services for families in need of food assistance through a nonprofit or food bank would primarily fall under Purpose Area 1.

**Eligibility:** Food banks and food assistance services can be provided to families that are eligible at the following level:

- Supportive Services.

Food banks and food assistance services are assistance, and thus can only be provided to families eligible at the Supportive Services level for up to four months.

## FOSTER CARE SERVICES

One of the core requirements for TANF is the placement of children in the home with their parents or relatives. When a child enters out-of-home placement or is away from the home for more than 45 days for other reasons, the family's eligibility for TANF can be affected. However, children in out-of-home placements can be considered still under the care and control of parents or caretaker relatives provided that they are absent from the home for the following reasons:

- The child or the adult is out of home for medical reasons;
- The child is receiving educational services that require him/her to be away from the home;

- The child is visiting an absent parent;
- The child is in voluntary foster care placement (which in Colorado is limited to 3 months);
- The child is under the jurisdiction of the court, but the goal remains reunification with the family; and/or
- Legal custody is held by an agency that does not have physical possession of the child.<sup>96</sup>

Consequently, services to families whose children are in foster care are appropriate for TANF funding, provided the goal is reunification. For example, a child may be in a Therapeutic Foster Care home due to complex mental health needs. While the child is in placement, both the parents and the child could receive TANF funded services to develop better parenting skills, resilience, and strategies for managing the mental health needs.

Please note: Foster care payments to the foster family are not an appropriate service for TANF funding.

**Purpose Area:** Services to families and children while the children are in foster care placements fall under Purpose Area 1. The primary objective of the services must be reunifying children with parents or other relatives.<sup>97</sup>

**Eligibility:** Foster care services can be provided to families that are eligible at the following level:

- Supportive Services.

Most foster care services are not assistance, and thus can be provided to eligible families in a diversion format or longer term supportive services format.

## HEALTH EDUCATION/HEALTH PROMOTION

Federal TANF Funds can be used to fund Health Education and Promotion, in recognition of the strong correlation between poverty and poor outcomes for families in the areas of nutrition and health.<sup>98</sup> Appropriate uses of TANF to fund health education and health promotion TANF expenditures include such things as:

- Health education, nutrition, and healthy lifestyle choices as a component of a life skills curriculum for youth, young adults, or needy parents;
- Nutrition and health education included in parenting classes, particularly for pregnant women or families with young children;
- Home-based services to improve the health of the home environment; and
- Prevention classes focused on substance abuse, obesity, HIV/AIDS, or other health risks.

**Purpose Area:** Health education and promotion services primarily fall under Purpose Areas 3 and 4 because they would be offered as components of life skills curriculums and parenting programs that target at risk teens and young families and are more preventative in nature.

**Eligibility:** Depending on the purpose of the service, health education and promotion services can be provided to families that are eligible at the following levels:

- Purpose Area 3; and
- Purpose Area 4.

## HOME REPAIR AND OTHER CONSTRUCTION

Colorado Works offers the following guidance on the construction prohibition: Federal dollars cannot be used for capital construction. Segregated state and local MOE dollars may be used in limited circumstances, which have not

been clearly defined in regulation. Thus, counties should use extreme caution if pursuing this option because they can inadvertently misuse MOE funds.

The proportion of MOE funding used for the capital construction project cannot exceed the ratio of TANF eligible people who will benefit from the construction project. For example, if 15% of the people who will use the building will be TANF eligible and receiving services that meet the purposes of TANF, then up to 15% of the project may be paid from MOE funds. The project must further at least one of the purposes of TANF and continue to serve the TANF-eligible population into the future. Examples of capital construction projects include childcare centers, social service buildings, employment centers, and counseling centers.

Counties may not use TANF funds to construct or purchase buildings or facilities or to purchase real estate. This restriction is based on the general rule that in the absence of specific legislative authority, appropriated funds may not be used for the permanent improvement of property, including construction and purchase.<sup>99</sup> It is now, however, permissible to use TANF funds for "minor rehabilitation" but there is no HHS guidance on what types or cost of repairs are allowable, making it difficult for states to determine the extent to which using TANF funds in this area is permissible.<sup>100</sup>

Options for home repair and other construction through TANF include:<sup>101</sup>

- Providing direct funding for home repairs or funding to a community agency that provides such services; and
- Providing assistance with weatherization.

**Purpose Area:** Home repair falls under Purpose Area 1. If construction expenses are for other types of buildings (e.g., repairing a community center for youth development classes), it would fall under the same Purpose Area as the service that will be delivered in the building being improved.

**Eligibility:** Home repairs can be provided to families that are eligible at the following levels:

- Supportive Services; and
- Purpose Area 4.

Home repairs are generally not categorized as assistance, and would most likely be offered in a diversion format because they, by nature, would be a non-recurrent, short-term need.

**More Information:** In Colorado, some counties have programs that support housing repairs or contracting with private service providers, such as exterminators and repairmen. For example:

- Boulder County uses its TANF funds to contract with the County Housing Authority and Workforce Investment Act center in an effort to buy property that has been dilapidated and restore it for client habitation. This program simultaneously employs low-income individuals serviced through the Workforce Investment Act while creating housing opportunities for TANF clients.<sup>102</sup>

## HOME-BASED SERVICES

At the local level, home visitation services like the Nurse Family Partnership Program are appropriate for TANF funding. These programs are designed to keep children in the home, improve parenting skills, improve nutrition and health skills, and generally strengthen families who have newborns or toddlers.

These services fall under many other service types, such as family planning, parenting classes, promoting marriage, responsible fatherhood, life skills, etc. As services are designed for families, counties may wish to identify which



services will be more successful when provided one-on-one in the home and design the home visitation program with those in mind. Nurse Family Partnership is an evidence-based approach to these services.

**Purpose Areas:** Home-based services may fall under a variety of Purpose Areas, depending on the type of service. Federal guidelines have explicitly noted that home-based services are appropriate under Purpose Area 3,<sup>103</sup> but they may also address needs under Purpose Areas 1 and 4.

**Eligibility:** Depending on the purpose of the service, home-based services can be provided to families that are eligible at the following levels:

- Supportive Services;
- Purpose Area 3; and
- Purpose Area 4.

Home-based services are not assistance, and thus can be provided to eligible families in a diversion format or longer term supportive services format.

## HOME PURCHASE

- TANF funding may support families wishing to purchase homes in a variety of ways:<sup>104</sup>
- Helping the family with a down payment on a home for first-time home buyers;
- Helping the family with the settlement costs on a home for first-time home buyers; and
- Providing loans to former TANF families to assist with first-time home purchases.

Appropriate requirements and incentives can be added to these services, such as requiring families remain in the home for at least five years. Counties can penalize families failing to meet the requirements by treating the money provided as an overpayment subject to recovery. Alternatively, counties can create incentives to meet the requirements, such as converting loans that help with home-ownership to grants if the families stay in the home for at least five years.

When TANF funds are used for loans, they do not count as “assistance.” If the loan was later converted to grant, it would be a non-recurrent, short-term benefit and would also not count as assistance.<sup>105</sup>

**Purpose Area:** Home purchase falls under Purpose Areas 1 and 2.

**Eligibility:** Home purchase services can be provided to families that are eligible at the following level:

- Supportive Services.

Home purchasing services are not assistance, and most likely would be offered in a short term, diversion format or a longer term financial investment program such as an individual development account.

## HOUSING AND HOMELESSNESS

Research demonstrates that adequate housing is essential for low-income families to improve their economic well-being. In addition, low-income families with access to affordable housing are more likely to successfully transition to improved economic well-being and family stability.<sup>106</sup> However, housing affordability is a challenge for families currently receiving TANF benefits as well as for families who have recently moved from welfare to work. High housing costs can leave families with insufficient remaining income for basic necessities or to pay for

childcare, clothing for work, transportation, and other expenses that often must be met for families to move from welfare to work.<sup>107</sup>

TANF can be used strategically to prevent homelessness by assisting families in accessing or maintaining affordable housing opportunities. Using the flexibility afforded by the definition of “assistance” in the final TANF regulations, states and counties may finance short-term homelessness prevention benefits for all families with children. Homelessness prevention benefits are excluded from the definition of “assistance” if the benefits meet the following three criteria:

- Benefits are designed to deal with a specific crisis situation or episode of need;
- Benefits are provided on a one-time basis or for a prospective period that does not exceed four months; and
- Benefits are not intended to meet recurrent or ongoing needs.

It is not necessary either to deny emergency assistance to families because they do not receive TANF cash assistance or to run the clock on families’ 60-month federal lifetime TANF time limit to provide them with emergency housing assistance and services. Overall TANF requirements such as time limits, work participation, and child support assignment will not apply to short term housing services.

However, if housing assistance exceeds four months, TANF Basic Cash Assistance eligibility and requirements will apply unless the benefits are provided entirely with MOE funds that are accounted for separately from TANF funds. Counties that wish to provide such ongoing housing benefits to families that are not receiving monthly TANF cash benefits would be advised to use MOE funds in these cases so the months of assistance do not count against the federal time limit.<sup>108</sup>

Options for supporting housing and homeless services through TANF include:<sup>109</sup>

- Providing payment for rent, mortgage or utility;
- Providing first and last month rent deposits and security deposit;
- Providing emergency shelter, transitional housing, or short-term rent payments for homeless or other needy families;
- Providing services that help prevent eviction or locate new housing;
- Contracting with community agencies that provide homelessness prevention services; and
- Making loans to needy families to provide stable housing.

Home repairs are another strategy for assisting families to maintain safe housing. Please see the section, “Home Repair and Other Construction” for more information.

**Purpose Area:** Services for families in need of housing and homeless services will often be provided under Purpose Areas 1 and 2. However, housing and homelessness prevention services can also be appropriate under Purpose Areas 3 and 4. For example, Purpose Area 3 applies because studies demonstrate that housing assistance that allows families to move to better neighborhoods can have positive effects on youth development, including lower teen pregnancy, lower involvement in the criminal justice systems, increased high school graduation rates, and the increased likelihood of entering college.<sup>110</sup> Purpose Area 4 applies as housing services are critical for maintaining two parent families.

**Eligibility:** Depending on the purpose of the service, housing services can be provided to families that are eligible at the following levels:

- Supportive Services;
- Purpose Area 3; and
- Purpose Area 4.

**More Information:** In Colorado, many counties have used TANF funds to support homeless shelters, emergency housing, and, as noted earlier, even housing repairs or contracting with private service providers, such as exterminators and repairmen. Other counties have developed specialized programs that fight homelessness in conjunction with job training efforts. For example:

- The CHOICES program in Adams County identifies low-income families in the community before they enter cash assistance and connects them with both housing assistance and training and professional licensure and certification programs.<sup>111</sup>
- In 2000, the North Carolina General Assembly agreed to set aside \$3 million of federal TANF funds for housing assistance programs to help families transitioning from welfare to work. Pilot projects were initiated in eight counties, each of which was allowed to structure the program in its own way, to best meet the needs of that community. Most of the programs include some form of counseling--classes on successfully negotiating the maze of finding a rental unit, budgeting advice, or homeownership counseling--to help families achieve self-sufficiency. They also included rental subsidies or assistance with making a deposit on a rental unit, to help those families gain a foothold when they are just entering the working world. These subsidies then decrease with time, as earnings increase. Most of the programs subcontract out to nonprofit organizations in the community, and many have successfully leveraged local dollars to extend the program further.<sup>112</sup>

**Additional Resources:** In Colorado: LEAP is a state program that provides assistance with home heating to TANF eligible households:<sup>113</sup> <http://www.cdhs.state.co.us/leap/>

The Crisis Intervention Program (CIP) provides assistance for furnace repair or replacement and for replacing broken windows:<sup>114</sup> <http://www.cdhs.state.co.us/leap/>

## INDIVIDUAL DEVELOPMENT ACCOUNTS

Individual Development Accounts (IDAs) are matched savings accounts funded partially by TANF and partially by the recipient. They can be utilized for the following three purposes, with a goal of supporting self-sufficiency by helping families build assets for:

- Post-secondary education and training;
- Business capitalization; and/or
- Home ownership.
- Savings accumulated in IDAs are not counted toward the resource limit or toward determining eligibility for all means-tested government assistance. To implement an IDA program through TANF, counties must have a formal, written policy in place describing the purpose of the funded IDA program, allowable use of TANF funds, and specific detail regarding how a participant is assisted in establishing an IDA account. TANF IDA Programs can be operated internally within Human Services or through contracts with partners.

When contracting out your IDA Program, key steps include:

- Selecting a community partner that has experience moving clients to self-sufficiency through fiscal management;

- Meeting with your potential community partner to review the requirements of establishing an IDA Program; and
- Developing a contract with your community partner that clearly specifies the contract period, client eligibility requirements and how eligibility will be documented, client payment structure, performance measures to track, and guidelines for invoicing and reporting.

**Purpose Area:** IDAs always fall under Purpose Area 2.

**Eligibility:** IDAs can be provided to families that are eligible at the following level:

- Supportive Services.

IDAs are federally excluded from the definition of assistance. IDAs offered in the context of a specific program (such as the first example below) may have their own programmatic guidelines.

**More Information:** Example programs include:

- Denver County offers clients who have exited TANF and maintained employment for six months a match of \$4 for every \$1 in earned income that a client saves in an IDA.
- Boulder County's IDA program, called Personal Investment Enterprise (PIE), is contracted out to a local non-profit and implemented through a collaborative effort which includes numerous private and public partners.

## JUVENILE DELINQUENCY PREVENTION

TANF funds are not intended to fund juvenile justice programs, but are appropriate when the program is focused on delinquency prevention and falls under the third purpose area. Delinquency prevention programs may be targeted for at-risk youth or youth already involved in the justice system, and should have a youth development focus intended to increase protective factors and decrease risk factors among the youth. Such programs must fall under a TANF purpose area, which means incorporating more than risk prevention strategies. For example, a juvenile delinquency prevention program that includes employment, self-esteem and self-awareness development, teen pregnancy prevention, or other services that explicitly fall under a TANF purpose area would be appropriate.

**Purpose Area:** Juvenile delinquency prevention as part of a youth development program targeted at high risk behavior would fall under Purpose Area 3.

**Eligibility:** Juvenile delinquency prevention services are appropriate for youth at the following eligibility level:

- Purpose Area 3.

**More Information:** An example of a TANF funded juvenile delinquency prevention program comes from the Juvenile Delinquency Prevention and Diversion Initiative in Maryland.

- This program provides for community based, multi-service prevention programs serving youth and families. It is a statewide program with local government oversight that serves youth at risk of becoming delinquent because of their behaviors and circumstances and youth who committed minor delinquencies. Parents, schools, juvenile justice programs, police, youth, and other agencies can refer a youth into the program. The purpose of the program is to enhance the motivation, performance, and self-esteem of youth, all of which contribute to TANF Purpose Area 3.<sup>115</sup>

## LEGAL SERVICES

TANF funds may be used for legal services, provided those services do not involve “prosecution of claims against the Federal government.”<sup>116</sup> Examples of appropriate legal services include:

- Legal support to help families pursue SSI benefits;
- Resolving legal problems that are a threat to family stability;
- Resolving legal problems that are a threat to the employment of needy parents; and
- Legal issues involved with the settlement of bad debt (e.g. credit cards, car payments).

**Purpose Area:** Legal services fall under Purpose Areas 1 and 2.

**Eligibility:** Legal services can be provided to families that are eligible at the following level:

- Supportive Services.

Legal services are not assistance, and thus can be provided to eligible families in a diversion format or longer term supportive services format.

## LIFE SKILLS

TANF is designed to assist families and individuals gain the life skills required for self-sufficiency. Life skills classes can be an important component for many families and youth. TANF funds can also be used for “services that enable youth who have or who will emancipate from foster care to have the skills and support necessary to help them achieve self-sufficiency and lead productive lives in the community.”<sup>117</sup> Life skills classes may be equally appropriate for youth outside the foster care system or adults involved with other TANF services. These classes can include a wide variety of content, such as:

- Job and work skills;
- Computer skills;
- Financial management skills;
- Cooking, nutrition, and healthy living skills;
- Interpersonal communication and relationship skills;
- Time management;
- Critical thinking and problem-solving;
- Goal setting and self-discipline;
- Effective communication; and
- Conflict resolution.

**Purpose Area:** Life skills classes can apply to all four purpose areas depending on the focus and the population being served. For example, adults participating in life skills classes may be most appropriate for Purpose Area 2, as these skills are critical for achieving long-term self-sufficiency, and Purpose Area 4, as these skills can help in maintaining healthy relationships. However, youth participating in life skills classes are more likely to be served under Purpose Areas 3, as these are skills that will help them with healthy relationships and life choices, such as preventing out of wedlock pregnancies.

**Eligibility:** Depending on the purpose of the service, life skills classes can be provided to families and youth that are eligible at the following levels:

- Supportive Services;
- Purpose Area 3; and
- Purpose Area 4.

Life skills classes are not assistance, thus can be provided to eligible families in a diversion format or longer term supportive services format.

**More Information:** Colorado has numerous examples of programs that provide life skills classes to assist at risk youth and low-income families achieve self-sufficiency. For example:

- “Garfield County uses its block grant to contract with Colorado Mountain College to offer classes on parenting skills, job readiness, and life skills. The comprehensive classes also include opportunities for English language learning, job development services, Pell grant application assistance, presentations about topics such as domestic violence, and case management for individuals who need vocational rehabilitation or will be applying for Supplemental Insurance Income. The college covers the cost of taxis for any student needing transportation. In a similar effort, Mesa County has begun to combine diversion payments, Pell grants, and part-time employment in order to fund college educations for qualified individuals.”<sup>118</sup>

## MEDIATION

Mediation is a specific type of legal service that is appropriate for TANF funding when it is used to directly address one of the Purpose Areas. For example, to keep families in their homes, TANF can be used to pay for mediation between a family and their landlord. This is similar to services available through the Homelessness Prevention and Rapid Re-housing Program and a partnership between TANF and this program can be beneficial to the outcomes of both in preventing homelessness.

Additionally, TANF can pay for mediation between parents, whether married or not, to improve marital, parenting, and child support outcomes. Mediation is a recommended service according to federal guidance, and, in this context, mediation would fall under Purpose Area 4, as it can help sustain two parent families or ensure the non-custodial parent remains involved with the family, including paying for child support.

Finally, other types of mediation services may be appropriate for TANF funding on a case-by-case basis. For example, if debt repayment is a barrier for a family to achieve self-sufficiency, mediation to resolve the debt or establish a payment schedule may be a necessary service.

**Purpose Area:** Mediation services can fall under all four TANF Purpose Areas, depending on the design of the program and the need it seeks to fill. Mediation within a marriage is specifically appropriate for Purpose Area 4.

**Eligibility:** Depending on the purpose of the service, mediation services can be provided to families that are eligible at the following levels:

- Supportive Services;
- Purpose Area 3; and
- Purpose Area 4.

Mediation services are not assistance, and thus can be provided to eligible families in a diversion format or longer term supportive services format.



## MENTAL HEALTH & SUBSTANCE ABUSE SERVICES

Mental Health and Substance Abuse services and support can be funded through TANF. However, it is important to remember that TANF funds can only be used for non-medical/non-treatment services. Examples of appropriate uses of TANF Funds to support mental health and substance abuse programming include:

Using Federal TANF funds to provide counseling services (e.g., mental health services, anger management counseling, and substance abuse counseling services) to family members with barriers to employment and self-sufficiency; and

Using Federal TANF or State MOE funds to provide non-medical substance or alcohol abuse services, including room and board costs at residential treatment programs.

**Purpose Area:** Services for families and individuals in need of mental health and substance abuse support fall under Purpose Areas 1 and 2, as mental health and substance abuse needs can interfere with family's stability and self-sufficiency. Individual and marital counseling services are also appropriate under Purpose Areas 3 and 4.

**Eligibility:** Mental health and substance abuse services are appropriate for families eligible at the following level:

- Supportive Services.

Mental health and substance abuse services are not categorized as assistance and thus can be provided to eligible families in a diversion format or longer term supportive services format.

If the services are specific to preventive activities, they are appropriate for families and youth who are eligible at the following levels:

- Purpose Area 3 ; and
- Purpose Area 4.

**More Information:** There are numerous examples across Colorado of TANF supported mental health services:

- *La Plata County:* The SUCCESS program, which is based on the Dialectic Behavior Therapy model and operates out of Southwest Colorado Mental Health Center, requires a six-month commitment from clients to attend weekly sessions that last two hours. The target population is individuals with serious mental health issues, suicidal thoughts, or chronic problems in maintaining relationships. The curriculum covers mindfulness, interpersonal effectiveness, emotion regulation, and distress tolerance.<sup>119</sup>
- *El Paso County:* Pike's Peak Mental Health outstations a licensed clinical social worker at the TANF office to assist TANF case managers and technicians with assessing need for mental health services and connecting those in need with mental health services. This worker can provide short-term consultation; in the case of longer-term counseling or treatment, the social worker refers the individual to other treatment services operated by Pike's Peak Mental Health.<sup>120</sup>
- *Denver County:* Project Wise receives TANF funding to serve 50 TANF families with intake assistance, crisis intervention, individual counseling, and support and therapy groups. The program serves women whose problems are not chronic or severe, but who face issues such as anxiety, personal or family crisis, depression, or behavioral issues. The initiative bases its services on an "empowerment model" instead of a mental health model, with the goal of helping women make their own choices and recognize their own power.<sup>121</sup>

**Additional Resources:** The following reports are helpful resources for any TANF administrators who wish to fund an expansion of mental health and substance abuse support services in their communities:

- Welfare Peer Technical Assistance Network ~ Office of Family Assistance Department of Health and Human Services' report, *Effectively Serving TANF Clients with Substance Abuse Problems: Making a Difference on the Frontline*. <http://peerta.acf.hhs.gov/pdf/seminar2.pdf>
- Mathematica Policy Research's report, *Addressing Mental Health Problems Among TANF Recipients: A Guide for Program Administrators*.
  - <http://www.mathematica-mpr.com/PDFs/addressmental.pdf>

## MENTORING

Mentoring services for at risk teens and children is an eligible TANF expenditure, as are mentoring services for parents.

*Youth Mentoring:* Mentoring is an important component in an array of programs that serve at-risk youth and children. It can build self-esteem, enhance potential for self-sufficiency, reduce adolescent risk-taking behavior, improve school attendance, improve parental relationships, and improve feelings of self-worth. To be effective, mentoring programs must be highly structured, reflect the unique needs of each youth participant, use trained adult mentors, and include a combination of enrichment activities and adult supervision to achieve these improved outcomes. Successful programs typically have weekly meetings between adults and youth, with interactions focused on developing self-esteem and awareness, positive attitudes toward school, healthy life style choices, and goal setting skills.<sup>122</sup>

*Adult Mentoring:* Mentoring programs can also connect adults with families who are struggling. Adult mentoring is often focused around developing parenting skills, stress management, financial and life-skills development, and developing resiliency in the parents. Mentoring programs can also specifically focus on marriage and developing healthy and sustainable marriages. Adult mentoring is often one component in a larger program that addresses a variety of barriers to self-sufficiency.

***Purpose Area:*** Mentoring services can fall under all four TANF Purpose Areas, depending on the design of the program and the need it seeks to fill. If the mentoring service reduces disruptive behavior that might result in a family being challenged with keeping a child in the home or improves parenting skills to manage a high-needs child, the service would support Purpose Area 1. If a mentoring program reduces barriers to parents maintaining employment the program would support Purpose Area 2. Mentoring focused on building youth skills is most likely to fall under Purpose Area 3. Mentoring may also be appropriate for Purpose Area 4 when it is focused on developing healthy marriages.

***Eligibility:*** Depending on the purpose of the service, mentoring programs can be provided to families and youth that are eligible at the following levels:

- Supportive Services;
- Purpose Area 3; and
- Purpose Area 4.

Mentoring services are not categorized as assistance, and thus can be provided to eligible families in a diversion format or longer term supportive services format.

***More Information:*** Colorado has a number of TANF funded mentoring programs. For example:

- Montrose County funds Teen Companion Program, which provides mentoring to at-risk youth ages 10 to 18 to target teen pregnancy prevention and promote school completion.<sup>123</sup>

**Additional Resources:** The following report is a helpful resource for any program administrators who wish to expand mentoring programs in their communities with the support of TANF funding:

- Welfare Information Network's article, *Addressing the Challenges Faced by Teens in TANF*. <http://76.12.61.196/publications/TANFTeensIN.htm>

## OUTREACH AND ENROLLMENT IN MEDICAID OR CHP+

The U.S. Department of Health and Human Services' Administration for Children and Families' TANF Funding Guide highlights outreach activities that improve access of needy families to medical benefits provided under the Medicaid or CHIP (CHP+ in Colorado) programs as a legitimate TANF expenditure.<sup>124</sup>

The TANF prohibition on expending Federal TANF funds on medical services is based largely on the concept that the medical needs of low-income families should be provided for under Medicare, Medicaid, and CHP+. In Colorado, families who get cash benefits from Colorado Works (State TANF office) are also eligible for Medicaid.<sup>125</sup> In addition, Transitional Medicaid benefits are available to families transitioning off of welfare due to increased earnings.<sup>126</sup>

**Purpose Area:** If TANF funding is being used to support outreach that increases the enrollment of needy families in public health insurance, the outreach activity would be considered a non-assistance service and would fall under Purpose Areas 1 and 2 (because outreach would be specifically targeted to families that meet the TANF eligibility criteria of "needy").

**Eligibility:** Outreach activities can be provided to families eligible at the following level:

- Supportive Services.

**Additional Resources:** The Colorado Department of Health Care Policy and Financing is the umbrella organization for Colorado's public health insurance programs (Medicaid and CHP+). The website below is a helpful resource in connecting families and children to public health insurance. <http://www.colorado.gov/cs/Satellite/HCPF/HCPF/1197969485591>

## NON-CUSTODIAL PARENTS

"A non-custodial parent is a parent who does not have physical and/or legal custody of his/her child by court order."<sup>127</sup> TANF funds can be used to support a non-custodial parent of a child who is receiving TANF.<sup>128</sup> However, it is important to remember the following when providing services to non-custodial parents:

- Non-custodial parents whose children are ineligible for TANF-funded services cannot receive assistance;<sup>129</sup>
- Colorado would not consider minor parents as "non-custodial parents" because Colorado defines a minor parent as a parent who is under age 18 and all unmarried minor parents are considered children for purposes of time limits and budgeting;<sup>130</sup>
- States can help any needy parent, including a noncustodial parent, by providing services that meet one of TANF's key purpose areas such as ending the dependence of needy parents on government benefits by promoting job preparation, work, and marriage through vocational training programs, marital counseling, and workshops that help participants learn how to submit successful job applications, etc.;<sup>131</sup> and
- The non-custodial parent *must* live in the same state as the child to be eligible for TANF services and supports.<sup>132</sup>

Programs that help non-custodial parents prepare for and find jobs can help states meet their work requirement targets. “If a non-custodial parent with a child receiving TANF assistance participates in countable work activities, that parent can count toward the state’s work rates. To count the work participation of a non-custodial parent, a state must provide some benefit to that parent that meets the definition of “assistance.” If it does so, the state may not retain the non-custodial parent’s child support payments as reimbursement for this assistance. The 1999 TANF regulations specify that a state may choose to include the non-custodial parent (living apart from the child) as a member of the child’s eligible family. (If non-custodial parents are included in the state’s definition of “family,” the family would *not* be considered a “two parent family” for purposes of the two-parent work rate.)”<sup>133</sup>

Examples of eligible TANF expenditure that can be used to support non-custodial parents include:

- Job or career advancement activities;
- Marriage counseling;
- Refundable earned income tax credits;
- Child care services;
- Employment services designed to increase the noncustodial parent's ability to pay child support; and
- Education and certification programs.

**Purpose Area:** Services to non-custodial parents can fall under Purpose Areas 1, 2, or 4.

**Eligibility:** Depending on the purpose of the service, non-custodial parents can be eligible for services at the following levels:

- Supportive Services; and
- Purpose Area 4.

Services to non-custodial parents may be assistance, depending on the service. If the service is not an assistance service it can be provided to eligible families in a diversion format or longer term supportive services format.

## PARENTING CLASSES

TANF funds can be used to help new parents develop good parenting skills. These types of services could be provided either through group classes or individual, home-based skill building sessions. Home visiting programs and nurse/family partnerships that help prevent child abuse, promote good prenatal and infant care, and enhance child development would be appropriate for TANF funding. These programs also provide counseling and information and link pregnant women or mothers with services they need. Some programs have included goals like increased spacing between births and avoidance of welfare dependency by the mother. Nurse home visiting is one of the few programs shown through a random assignment research design to delay or reduce subsequent births.<sup>134</sup>

**Purpose Area:** Parenting classes cover a broad spectrum of programming and could fall under Purpose Areas 1, 2, and 4.

**Eligibility:** Depending on the purpose of the service, parenting classes can be provided to families that are eligible at the following levels:

- Supportive Services; and
- Purpose Area 4.

Parenting classes are not assistance, and thus can be provided to eligible families in a diversion format or longer term supportive services format.

## PRENATAL SERVICES

TANF funds can be used for prenatal related services only for pregnant adults and teenagers who do not have Medicaid or an alternate health insurance plan that covers prenatal services. Individuals seeking support to cover prenatal costs will have to demonstrate to their case manager that prenatal services are not covered through a public health insurance program or alternate healthcare program. Case managers working with pregnant teens and mothers should encourage prenatal care (covered through public health insurance if possible) as early as possible because “current evidence-based best practices for prenatal care recommend care begin in the first trimester due to heightened fetal vulnerability in the first trimester.”<sup>135</sup> While TANF funds can be used to cover prenatal care and checkups for pregnant women, most pregnant women who receive TANF should be eligible for prenatal support through Medicaid and/or Special Supplemental Nutrition Program for Women, Infants, and Children (WIC).

TANF can also fund non-medical prenatal services, such as parenting classes, referrals to community services, eligibility verification for other prenatal programs, and other supportive services that will aid a pregnant woman, particularly pregnant teens, in avoiding long-term dependence on social welfare programs.

**Purpose Area:** Prenatal services are primarily appropriate under Purpose Areas 1 and 2.

**Eligibility:** Prenatal services can be provided to women that are eligible at the following level:

- Supportive Services.

Prenatal services are not assistance, and thus can be provided to eligible families in a diversion format or longer term supportive services format.

**More Information:** Example programs from other states include:

- Illinois Teen parent Services, which includes prenatal services for parenting teens in combination with employment, parenting, education, and other supportive services. The primary goal of the program is to provide services that will reduce long-term risk of dependence.<sup>136</sup>

Another excellent source of prenatal care for low income families is the Nurse Home Visitor Program or Nurse/Family Partnerships. These programs help prevent child abuse, promote good prenatal and infant care, and enhance child development. While Nurse Home Visitor programs are not funded through Federal TANF funds, they often serve as a qualifying maintenance of effort expenditure for states.

## PROMOTING MARRIAGE

TANF encourages states to think creatively about services that help individuals form and maintain healthy marriages.<sup>137</sup> Eligible marriage promotion services include, but are not limited to:

- Providing parenting classes, premarital and marriage counseling, and mediation services;<sup>138</sup>
- Education in high schools on the value of marriage, relationship skills, and budgeting;
- Creation of marriage education services for couples;
- Providing classes that promote relationship skills to teens and young adults;
- Training for service providers to deliver healthy marriage services;

- Conferences, meetings and events designed to educate stakeholders about healthy marriage initiatives;
- Divorce reduction programs that teach relationship skills;
- Surveys and studies to determine attitudes, barriers, and perceptions about marriage;
- Handbooks, flyers and brochures about the benefits of marriage and how to increase skills for a healthy marriage;
- Marriage mentoring programs that use married couples as role models and mentors in at-risk communities;
- Public service materials/advertising campaigns to raise awareness for what constitutes healthy marriage, benefits of healthy marriage, and where to access services to support healthy marriage skills; and
- Support for healthy marriage coalitions or commissions.<sup>139</sup>

Federal TANF law recommends programs target three different populations:<sup>140</sup>

- Non-married pregnant women and non-married expectant fathers, with services that include marriage education, relationship skills, parenting skills, financial management, conflict resolution, and job/career advancement;
- Engaged couples and couples or individuals interested in marriage, with services that include pre-marital education and marriage skills training; and
- Married couples, with services that include including marriage enhancement and marriage skills training.

Federal law also allows for programs that reduce the disincentives to marriage in means-tested aid programs, but these can only be offered in conjunction with another healthy marriage activity.”<sup>141</sup>

**Purpose Area:** Marriage Preservation Programs fall under Purpose Areas 3 & 4.

**Eligibility:** Marriage Preservation Programs can be provided to families that are eligible at the following levels:

- Purpose Area 3; and
- Purpose Area 4.

**Additional Resources:** The following report is a helpful resource for any program administrators who wish to expand Marriage Preservation Programs in their communities with the support of TANF funding:

- The Center for Law and Social Policy’s report, *The Marriage and Fatherhood Provisions of the Deficit Reduction Act of 2005*. <http://www.policyarchive.org/handle/10207/bitstreams/13931pdf>

## PRIMARY HEALTH CARE & MEDICAL SERVICES

The U.S. Department of Health and Human Services’ Administration for Children and Families’ TANF Funding Guide emphasizes that *ensuring families have sufficient food, medical coverage, quality affordable childcare, and reliable transportation* are critical components in transitioning a family to self-sufficiency. However, Federal TANF regulations specifically include a prohibition on expending Federal TANF funds on medical services. The only exception to this prohibition is pre-pregnancy family planning (see the Family Planning section for more information).

The Health and Human Services TANF Funding Guide recommends that states that need to expand medical support for TANF eligible families should consider using their state Maintenance of Effort funds (that have **not** been commingled with Federal TANF funds) to pay for medical services (i.e., for treatment of substance or alcohol abuse



not paid by Medicaid) or to provide medical coverage for families that lack medical benefits (e.g., for families ineligible for transitional Medicaid or for adults whose children are served by Medicaid or CHIP).<sup>142</sup>

**Purpose Area:** As stated above, medical services are not eligible service expenditures under TANF unless the service is pre-pregnancy family planning.

## RECREATIONAL SERVICES/CHILDREN'S ACTIVITIES

TANF funds can be used to specifically fund recreational services and children's activities as a component of after school programs, summer programs and a whole array of Positive Youth Development activities. It is important to note that the funded programs and activities have to be reasonably calculated to meet one of the TANF Purpose Areas. If they do, then funds for activities and recreational services as part of that program are considered acceptable TANF expenditures. For example, a summer employment program for youth that teaches trail maintenance may arrange a backpacking trip to the Spanish Peaks in order for the youth to gain experience with alpine trail maintenance. TANF funds could be used to cover the hiking boots and backpacks needed by the youth for their trip.

Examples of TANF eligible expenditures that cover recreational services and children's activities include:

- Covering water park costs for children participating in a summer program that specifically caters to TANF families;
- Covering art supplies for children participating in a summer art program in an economically challenged neighborhood; and
- Covering the costs of swimming goggles for low income, middle school students who are participating in a summer swim camp or on a school swim team.
- This list is only a start to the variety of recreational expenses that are appropriate for TANF funding, when the program falls under a purpose area.

**Purpose Area:** Recreational services and youth activities primarily fall under the Purpose Area 3 as activities related to positive youth development that are more preventative in nature. However, when provided to younger children, they may also indirectly contribute to Purpose Area 2 because a child's participation in summer camp, for example, may make it possible for a single mother to go to work and thus keep the family unit together under one roof.

**Eligibility:** Depending on the purpose of the service, recreational services for children and youth can be provided to families that are eligible at the following levels:

- Supportive Services; and
- Purpose Area 3.

If the family is employed, recreational services provided as a childcare service will not count as assistance and thus can be provided to eligible families in a diversion format or longer term supportive services format. However, if the family is unemployed, and the recreational service specifically serves as childcare it would be considered assistance and if the family needs ongoing support beyond four months – they would have to be eligible at the Basic Cash Assistance level. Please Note: There may be cases where a local County Department of Social/Human Services has a TANF funded contract with a local Boys and Girls Club to provide recreation services to low-income families and an unemployed family would not be required to fill out a full TANF Basic Cash Assistance application

to access those recreational services for their children (which also double as childcare) so the service would be offered in a non-assistance, supportive service context despite the employment status of the parents.

**More Information:** Many activities that fall under recreation are also youth development services. To learn more please see the Youth Development Service Template.

## REFUGEE AND LEGAL IMMIGRANT SERVICES

Refugees and legal immigrants who meet TANF eligibility requirements can receive TANF support in the state of Colorado.<sup>143</sup>

- A refugee is an individual who has been granted legal status of “Refugee” by U.S. Citizenship and Immigration Service (USCIS) based upon the person’s persecution, or fear of persecution, due to their race, religion, nationality, or membership in a particular group or political party.
- Legal immigrants are immigrants who legally entered and reside in the United States under one of five approved categories (employment based preference, family preference, Immediate Relatives of U.S. Citizens, Diversity, Refugees/Asylees).

If a refugee or immigrant family is eligible for TANF services, they can receive all of the same types of services as other families. The National Conference of State Legislatures’ Immigrant Policy Project has compiled a list of appropriate potential uses of TANF funds to better support refugee and immigrant populations working to achieve self-sufficiency. Recommended services include:

- Offering employment supports such as job search and placement assistance, post-employment follow-up services to ensure job retention, transportation, childcare and job skills training;
- Providing work experience and case management to individuals with employment barriers, such as little or no work history or limited English-speaking ability;
- Initiating public awareness campaigns to inform immigrant and refugee populations of their eligibility for EITC, food stamps, SCHIP and other services;
- Paying refugee services providers for linguistically and/or culturally appropriate services to help refugee TANF recipients in work activities;
- Sharing with employers the cost of on-site ESL or literacy classes;
- Providing skills training for new, unskilled, and semi-skilled workers to improve chances of job retention and advancement;
- Using federal TANF for nonmedical services such as substance abuse screening and counseling by a nonmedical professional;
- Providing stipends to parents with limited English proficiency who combine education and training with work;
- Funding a micro-enterprise program;
- Funding community-based organizations that employ TANF clients by covering the appropriate share of planning, development, and implementation costs;
- Using funds to purchase food stamps from the USDA for legal immigrants who are not eligible for benefits under the federal food stamp program; and
- Offering educational programs to prepare TANF recipients for the responsibilities of home ownership.<sup>144</sup>

**Purpose Areas:** Services to refugees and legal immigrants cover a broad range and can fall under all four of the TANF Purpose Areas.

**Eligibility:** To be eligible for TANF services, refugees and immigrants must have entered the country on or after August 22, 1996 and have been in the country for five or more years.<sup>145</sup> Depending on the purpose of the service, refugees and immigrants can be eligible at the following levels:

- Supportive Services;
- Purpose Area 3; and
- Purpose Area 4.

Some services to refugees and immigrants will be assistance services while others are non-assistance.

**More Information:** Colorado TANF funds support refugee recertification/retraining programs aimed at reemploying refugees in areas of high need, such as nursing. Colorado is also using TANF funding for case management, English as a Second Language, and childcare to job seekers and the newly employed.<sup>146</sup>

**Additional Resources:** The following agencies would be good resources for learning more about what is required in operating an effective refugee/immigrant program:

- African Community Center of Denver's Refugee Resettlement Program, which welcomes newcomers who have had to flee persecution within their home country. <http://www.africancommunitycenter.net>
- The Agency for Human Rights and Community Relations, which empowers communities to address local issues and strives to promote equal opportunity and protects the rights of all people regardless of race, color, creed, gender, sexual orientation, age, or disability. <http://www.denvergov.org/HumanRights>
- Ecumenical Refugee and Immigration Services, Inc., which helps to resettle refugees and asylees who are legally in Colorado by providing them assistance with educational needs, family and social services, medical attention, employment, and cultural orientation. [www.ersden.org](http://www.ersden.org)
- Lutheran Family Services of Colorado, which provides services, support, and encouragement to newcomers as they adjust to life in the United States. [www.lfsco.org](http://www.lfsco.org)
- Colorado Refugee Services Program (CRSP), Department of Human Services, State of Colorado, which ensures effective resettlement and promotes refugee self-sufficiency. [http://stateboard.cdhs.state.co.us/oss/Refugee/refugee\\_services\\_program.htm](http://stateboard.cdhs.state.co.us/oss/Refugee/refugee_services_program.htm)
- Rocky Mountain Survivors Center (RMSC), which assists survivors of torture and war trauma, and their families, to heal and rebuild their lives. <http://rmscdenver.org>

## RESPITE CARE

TANF funds can be used to support respite care in cases where it contributes to the child's welfare and supports the family's ability to be self-sufficient. Federal guidance on TANF indicates that TANF funds can be used to provide appropriate supportive services such as respite care to caregiver relatives who can provide a safe place for a needy child to live and avoid his or her placement in foster care. Respite care can help families and legal guardians or kin take care of a child with disabilities or behavioral issues because it provides respite for the family from the daily routine and stress of ongoing care.

**Purpose Area:** Respite services fall under either Purpose Area 1 or 4, depending on the intent and need. Services for families, caregiver relatives, and legal guardians in need of respite would fall under Purpose Area 1 because it

would contribute to keeping a family unit together in their own home. Respite services can also fall under Purpose Area 4 because it could alleviate marital strain related to the ongoing stress of caring for a child with a disability or behavioral issues and help keep a family unit intact.

**Eligibility:** Depending on the purpose of the service, respite services can be provided to families that are eligible at the following levels:

- Supportive Services; and
- Purpose Area 4.

Respite services provided under Purpose Area 4 are not assistance, and thus can be provided to eligible families in a diversion format or longer term supportive services format.

## RESPONSIBLE FATHERHOOD INITIATIVES

Responsible Fatherhood Initiatives are intended to promote fatherhood through a combination of improving marriages, improving parenting skills, and fostering the economic stability of families. Federal TANF laws define responsible fatherhood activities as including those activities that promote or sustain marriage, including:<sup>147</sup>

- Counseling, including pre-marriage counseling;
- Mentoring;
- Disseminating information about the benefits of marriage and two-parent involvement for children;
- Disseminating information on the causes of domestic violence and child abuse;
- Disseminating information about good parenting practices;
- Enhancing relationship skills;
- Education about controlling aggressive behavior;
- Marriage preparation programs including skills-based marriage education programs;
- Marital inventories;
- Financial planning services including education, counseling and mentoring on household management, budgeting, banking, and handling financial transactions;
- Divorce education and reduction programs, including mediation and counseling; and
- Encouraging child support payments.

Fatherhood Initiatives can also include improving the economic status of fathers, with activities that include:<sup>148</sup>

- Job search, training, retention, enhancement, and education services;
- Subsidized employment;
- Encouraging education (including career-enhancing education);
- Dissemination of employment materials;
- Coordination with existing employment services such as welfare-to-work programs; and
- Referrals to local employment training initiatives.

Fatherhood Initiatives can also support:

- Media campaigns that encourage fathers to play a responsible role in their children's lives;
- Assistance with establishing paternity;

- Case management services;
- Assistance with paying formal child support (e.g., reduced child support payment while participating in the program); and
- Peer support groups.

Many Responsible Fatherhood Initiatives are focused on men who are non-custodial parents. TANF funding for such initiatives is appropriate due to the importance of child support in ensuring economic stability for the child and mother. Initiatives focused on fathers who are custodial parents and/or remain married to the mothers are also appropriate for TANF funding.

**Purpose Area:** Responsible Fatherhood Initiatives are appropriate for funding under Purpose Areas 3 and 4.

**Eligibility:** Responsible Fatherhood Initiatives can be provided to families that are eligible at the following levels:

- Purpose Area 3; and
- Purpose Area 4.

**Additional Resources:** The following report is a helpful resource for any program administrators who wish to expand Marriage Preservation and Responsible Fatherhood Programs in their communities with the support of TANF funding:

- The Center for Law and Social Policy's report, *The Marriage and Fatherhood Provisions of the Deficit Reduction Act of 2005*. <http://www.policyarchive.org/handle/10207/bitstreams/13931.pdf>

## SEED FUNDING

As a result of TANF's relative flexibility compared to other government funding sources, TANF can be used to provide seed grants for new and innovative programs that can be reasonably calculated to meet one of the four TANF Purpose Areas. Counties can creatively use their TANF County Block Grants to subcontract with an initiative establishing a new service that would specifically address the needs of TANF eligible families in the community. Examples of TANF eligible seed funding would include:

- Helping employers establish or expand employee training programs to meet job access barriers faced by TANF recipients;
- Expanding the availability of mental health or substance abuse services for low-income families by developing new programs at community nonprofits;
- Establishing a new food bank in a rural community that provides food for very low income and homeless families; and
- Establishing new parenting programs that build strong parenting skills for teen parents.

**Purpose Area:** Seed money can be used to fund initiatives and new programs that are reasonably calculated to meet any of the four TANF Purpose Areas.

**Eligibility:** New or expanded supportive services resulting from an infusion of seed funding can be provided to families that are eligible at the following levels:

- Supportive Services.
- Purpose Area 3; and
- Purpose Area 4.

**More Information:** An example program includes:

- Massachusetts' State TANF funds recently provided a percentage of seed funding for a collaborative effort that included Massachusetts Department of Housing and Community Development, the North Shore Community Action Programs, Inc., and the Community Teamwork, Inc. to provide comprehensive job search and placement services for low income youth and adults. The Job Readiness Pilot Project included career counseling, educational and vocational training and skills building.

## SUPPLEMENTING THE FAMILY INCOME OR ASSETS

TANF funds can be used to directly enhance or supplement a family's income or assets. Eligible TANF expenditures include:

- "Increasing the level of earned income disregard for working families, which has a dual advantage because earned income disregard will benefit the state by increasing the work participation level;
- Funding educational programs that help working families to identify support services for which they may be eligible (Medicaid, food stamps, etc.), community agencies providing relevant services (food bank, clothing closet, etc.), or programs such as the Earned Income Tax Credit;"<sup>149</sup>
- "Creating a State refundable Earned Income Tax Credit Program, using State MOE funds to pay for the refundable portion of the credit;"<sup>150</sup>
- "Funding programs that actively help families become enrolled with other safety net and social support programs. This could include helping families to understand and fill out paperwork, or to create a plan for applying for and maintaining services, etc.;"<sup>151</sup>
- "Making loans to needy families to provide stable housing, secure a car, or for other reasons that are reasonably calculated to meet a purpose of the program;
- Funding a supplemental unemployment insurance program for unemployed workers in needy families who are not eligible for benefits under the State's regular unemployment insurance program;
- Providing stipends to needy parents who combine education/training and work;
- Matching the contributions of TANF eligible individuals in Individual Development Accounts (IDAs);
- Passing through to the family (increasing the child support disregard) some or all of the State's share of the assigned child support collection or pass through the full amount of the child support collection by using the State's share of the assigned child support collection for part of it and using additional State MOE funds to pay the remainder;
- Providing weatherization assistance or pay for home repairs;
- Providing rental assistance, including security deposits, application fees, and payments of back rent to prevent evictions; and
- Providing a moving allowance (e.g., when a needy adult family member secures a job that is not close to the family's home)."<sup>152</sup>

**Purpose Area:** Enhancing or supplementing a family's income or assets can fall under Purpose Area 1 or 2.

**Eligibility:** Enhancing or supplementing a family's income or assets can be provided to families that are eligible at the following level:

- Supportive Services.



If the support meets the ongoing basic needs of an unemployed family, the support is regarded as assistance. If the support helps an employed family get ahead and avoid needing ongoing Basic Cash Assistance, the support will be considered non-assistance and qualifies as a supportive service.

## TEEN PARENTING SERVICES

TANF can help new teen parents provide basic supports for their infants. For example, TANF funds can be used to cover necessities such as toiletries, diapers, baby food, etc. It is important to note, however, that the Act that created TANF places restrictions on minor teen parents who receive assistance, typically requiring them to live with adults and stay in school.<sup>153</sup>

Examples of appropriate services for teen parents include:

- Home visiting programs and nurse/family partnerships that help prevent child abuse, promote good prenatal and infant care, and enhance child development. These programs also provide counseling and link pregnant women or mothers with services they need. Some programs have included goals like increased spacing between births and avoidance of welfare dependency by the mother. Nurse home visiting is one of the few programs shown through a random assignment research design to delay or reduce subsequent births;<sup>154</sup>
- The addition of sites to an existing home visiting program;
- School-based childcare that allows teen parents to return to school and provides high quality early childhood care and education to their children;
- Teen parent educational programs that provide case management and/or education in alternative settings to encourage teen parents to continue their educations; and
- Supporting Second chance homes, which are group homes for teen parents who have no appropriate adult family member with whom to live. The homes often provide an array of services, including counseling and education in parenting and life skills.<sup>155</sup>

**Purpose Area:** Teen Parenting Services cover a broad spectrum of programming and could fall under Purpose Areas 1, 2, and 4. For example, if teen parents are unemployed and have a new infant that needs baby food and diapers, the support would qualify as basic assistance. However, if a teen parent participates in a parenting class, that service would be appropriate for Purpose Area 4.

**Eligibility:** Depending on the purpose of the service, teen parenting services can be provided to families that are eligible at the following levels:

- Supportive Services; and
- Purpose Area 4.

Some teen parenting services will be assistance, while others will count as non-assistance. Each service should be carefully assessed.

**Additional Resources:** The following report is a helpful resource for any program administrators who wish to expand Teen Parenting Services in their communities with the support of TANF funding:

- The Center for Law and Social Policy's report, *The TANF Funding Stream: When and How Welfare Funds can support Reproductive Health or Teen Parent Initiatives*.  
<http://www.policyarchive.org/handle/10207/bitstreams/14042.pdf>

## TEEN PREGNANCY PREVENTION

TANF funds can be used “to support youth development programs that have a primary goal of teen pregnancy prevention, but that provide a broad range of services including academic help, career preparation, and recreation.”<sup>156</sup> The State of Colorado’s goal under Purpose Area 3 is to achieve a two percent annual reduction in out-of-wedlock pregnancies. Colorado’s State TANF Plan has identified strategies for reaching that goal, which include:<sup>157</sup>

- “Providing counties with resource information regarding national evidence-based strategies and promising practices implemented by other counties in Colorado, including sharing evidence-based practices designed to reduce the incidence of teenage pregnancies. As such, an emphasis on developing after-school programs that engage middle and high school age children (both boys and girls) in positive youth development activities will be encouraged at the local level;
- Assisting counties in developing collaborations with their local health departments, schools, family and resource centers, and other partners;
- Continuing to seek statewide opportunities to fund initiatives designed to reduce out-of-wedlock pregnancies in general, and teenage pregnancies in particular; and
- Continuing its strict enforcement of child support. Colorado’s nationally recognized Child Support Enforcement program has helped to reduce the number of children born out-of-wedlock in the state by its aggressive pursuit of support. Potential single fathers are more cognizant of the fact they will be required to provide for their children and potential single mothers are more aware of the cost of raising a child with, or without, child support.”

On a more general programmatic level, family planning, teen parenting programs and teen pregnancy prevention services that can be supported by TANF include:<sup>158</sup>

- The establishment of a county teen pregnancy prevention program;
- Youth development programs that address high risk behavior such as unprotected intercourse, drug abuse, and dropping out of school and that incorporate tutoring, community service, and sexuality education;
- Counseling services or classes that focus on teen pregnancy prevention; and
- State or local media campaigns to encourage young people to delay parenting or to encourage fathers to play a responsible role in their children’s lives.<sup>159</sup>

**Purpose Area:** Teen Pregnancy Prevention services are highly appropriate for Purpose Area 3.

**Eligibility:** Teen Pregnancy Prevention services can be provided to teens that are eligible at the following level:

- Purpose Area 3.

**More Information:** Colorado has numerous examples of innovative teen pregnancy programs supported through TANF funds, such as:<sup>160</sup>

- Arapahoe County’s WAIT, a teen pregnancy prevention program funded with the TANF block grant and administered through the school system, that teaches students about abstinence and healthy teen relationships.
- Montrose County administers a Teen Companion Program, which mentors students ages 10 to 18. The *Get Real* evidence-based curricula promote informed decision making and positive life skills towards adolescent pregnancy prevention and school completion.

- In Prowers County's *Baby Think It Over* program, TANF funds support the purchase of electronic baby dolls that students must care for over the course of the week. The goal of the program is to demonstrate to students the responsibility and work associated with early childbearing.

**Additional Resources:** The following report is a helpful resource for any program administrators who wish to expand Teen Pregnancy Prevention in their communities with the support of TANF funding:

- The Center for Law and Social Policy's report, *The TANF Funding Stream: When and How Welfare Funds can support Reproductive Health or Teen Parent Initiatives*.  
<http://www.policyarchive.org/handle/10207/bitstreams/14042.pdf>

## TRANSPORTATION

Lack of transportation is often a barrier to work for low-income individuals – especially in rural and suburban communities throughout Colorado and across the United States. Improving access to transportation for low income individuals is closely aligned with TANF's primary focus of transitioning needy families to self-sufficiency. TANF funded transportation support can be provided in many forms such as:<sup>161</sup>

- Directly to families through transportation allowances (including providing tokens or passes for public transportation);
- Directly to families through reimbursement of mileage, fuel, auto repairs, or auto insurance for vehicles necessary to fulfill work participation requirements, including the costs of transporting "needy" children to and from childcare;
- Directly to families through financial support for purchasing a vehicle, and providing relocation assistance when an adult member of the family has secured work that is not close to the family's current home;
- Contracting with other agencies for busses or vans, or making an agreement to share the costs of transportation;
- Contracting with a community organization to refurbish old cars to provide to TANF recipients; and
- Investing in local initiatives to improve the transportation network in a way that would allow needy families better access to workplaces.

Transportation support can be provided as ongoing assistance or in the form of a Diversion payment. Diversion payments can also be used indirectly to assist an individual to address transportation challenges such as through the establishment of an Individual Development Account (IDA) that a TANF-eligible individual could use to cover qualified business capitalization expenses to establish a transportation service such as a van, shuttle, or door-to-door transportation service or the establishment of other types of IDAs or asset-building programs that permit car purchases and support a TANF purpose.

TANF funds may also be transferred to the Social Services Block Grant (SSBG) to address the lack of transportation infrastructure in many rural and inner city areas (SSBG may be used to serve families and children up to 200 percent of the poverty level). In addition, TANF funds could cover the administrative costs incurred by a State, local, or tribal TANF agency and other non-government agencies in the planning of transportation services for TANF-eligible individuals.<sup>162</sup>

*Job Access Reverse Commute (JARC) Grants:* The Colorado Works Program partners with the Colorado Department of Transportation to provide the Job Access/Reverse Commute (JARC) Program. The program provides funds to allow local communities to improve access to transportation services for employment and employment-related activities, with a focus on TANF recipients and eligible low-income individuals.<sup>163</sup> Funds from the JARC can be

utilized for capital, planning, and operating expenses. JARC grants are allocated to government, non-profit, and tribal organizations and include a special emphasis on rural and small urbanized areas.<sup>164</sup>

The JARC is an ongoing competitive grant program that has funded projects in many Colorado communities that address many of the same community-wide purposes as the list of appropriate uses of TANF above. Consequently, TANF funding can be used to meet the cost sharing requirements of this grant. For example, Montrose used some of its TANF funds to pay for transportation vouchers included as part of the JARC Grant match.<sup>165</sup>

**Purpose Areas:** Addressing the transportation needs of low income individuals is closely aligned with TANF Purpose Areas 1 and 2.

**Eligibility:** Eligibility will vary depending on the status of the family. Additionally, many transportation initiatives are community-wide, which carries its own requirements for eligibility.

- *Employed families:* If the transportation support is provided to an employed family, the family must meet the TANF Supportive Services eligibility level.
- *Unemployed families:* If the transportation support is provided to an unemployed family, the family must meet Basic Cash Assistance eligibility level.
- *Community-wide:* If the transportation support is in the form of a new bus line or new shuttle service that also meets the transportation needs of the broader public, the percentage of TANF funds must equal the percentage of users who can reasonably be expected to be families who meet the TANF Supportive Services eligibility. This can be determined through census data or a ridership survey. For example, if your survey demonstrates that 80% of your bus riders are TANF eligible, you can fund 80% of the bus service through TANF funds and must find 20% in other matching funds.

**More Information:** Many Colorado counties offer funding to help low-income families purchase vehicles (typically through diversion payments), but some counties also directly invest in public transportation to reach a broader group of low-income and disadvantaged families. For example:<sup>166</sup>

- Rio Grande County provided TANF funds to the Monte Vista Economic and Development Corporation to establish a local public bus system for the San Luis Valley, which is available for use by all county residents; and
- Grand Valley Transit in Mesa County has a “Rides to Work” program that offers free public bus rides for anyone in the community.

## YOUTH DEVELOPMENT

TANF funds can be used to support a broad array of youth development services. Many youth development, education and employment programs can be reasonably calculated to meet one of the four TANF purpose areas. The Health and Human Services TANF Funding Guide states that programs that “help young people stay in school, those that keep them supervised after school, and those that increase their motivation and self-esteem, can all be funded under Purpose 3.”<sup>167</sup> Purpose 4 also provides rationale for TANF supported youth development services since programs which “provide opportunities and motivation for disadvantaged boys to continue their education might make them more likely to become and stay married in the future.”<sup>168</sup>

There are numerous examples across the nation of states using TANF funding to support after-school programs for at-risk middle school students, provide services to low-income, at-risk youth with the goals of preventing welfare dependency and teen pregnancy and improving social, academic and employment outcomes; and to provide summer jobs to low-income youths.<sup>169</sup>

Examples of appropriate youth development expenditures under TANF include:

- Funding initiatives to improve motivation, performance and self-esteem of youth;
- After-school programs that provide supervision;<sup>170</sup>
- Parenting classes for teen parents;
- Cooking classes as part of a life skill curriculum for youth;
- Independent living classes;
- A full range of services for transition age youth;
- Job coaching/resume writing for youth;
- Service learning/community service programs;
- Summer camps/school; and
- Costs associated with an after school or summer program such as passes & tickets to recreational activities, sports equipment, notebooks, laptops, etc.

**Purpose Area:** Youth development services primarily fall under Purpose Area 3. However, there are specific scenarios where a youth development service would fall under Purpose Area 1, 2 or 4 (as described above). For example, “Purpose 1 might apply when a youth program might prevent a child’s removal from home by keeping the child in school and preventing disruptive behavior, or when a program helps a young parent keep her children at home.”<sup>171</sup>

**Eligibility:** Depending on the purpose of the service, youth development services can be provided to youth that are eligible at the following levels:

- Supportive Services; and
- Purpose Area 3; and
- Purpose Area 4.

Youth development services provided under Purpose Areas 1 and 2 are not assistance, and thus can be provided to eligible families in a diversion format or longer term supportive services format.

**More Information:** Colorado has numerous examples of innovative collaborations in expanding youth development services. For example, TANF funds have been used to support the following effective youth development programs:

- “The Colorado Youth Development Team is a public-private partnership of youth and professionals that raises awareness, promotes, enhances and unites positive youth development efforts and strategies across the State of Colorado. It was born out of the Colorado Advisory Council on Adolescent Health to develop a collective framework and common message regarding Positive Youth Development (PYD) in Colorado. The CYDT team is striving to institutionalize PYD at both the state and local levels.”<sup>172</sup>
- Jefferson County’s TANF-Youth Program “works with adolescents in TANF households to focus on long-term goals and prevent out-of-wedlock pregnancy. The program offers career counseling, referrals to other community and educational resources, and supportive services including tutoring, clothing, and transportation vouchers.”<sup>173</sup>

**Additional Resources:** The following report is a helpful resource for any program administrators who wish to expand youth development services and activities in their communities with the support of TANF funding:

- The Center for Law and Social Policy's report, *Tapping TANF for Youth: When and How Welfare Funds Can Support Youth Development, Education and Employment Initiatives*. <http://www.policyarchive.org/handle/10207/bitstreams/14042.pdf>

## VISION SERVICES

If eye exams and glasses are not covered through State Medicaid or another health plan, TANF funds can be used to cover the cost of eye exams and glasses. While Federal TANF regulations specifically include a prohibition on expending Federal TANF funds on medical services, the category of vision, while certainly health related, does not fall under primary medical services and can directly impact an individual's ability to both access and perform a job. In fact, many Departments of Social Services/Human Services will categorize vision related support as a pre-employment TANF service.

Departments of Human Services/Social Services that cover vision related expenses through TANF will require proof that the service is not already covered through Medicaid or another health plan. Also, while the support may be categorized as a pre-employment service, Departments of Human Services/Social Services will both cover the head of household and the children of the household (in recognition that TANF eligible families seeking employment cannot cover this expense and that is necessary for their child's wellbeing and basic functioning).

**Purpose Area:** Vision related services fall under Purpose Areas 1 and 2.

**Eligibility:** Vision services can be provided to families that are eligible at the following level:

- Supportive Services.

Vision related services would generally be considered a non-assistance supportive service offered through a diversion format.

**More Information:** Although vision services are not widely provided in Colorado, Jefferson County Department of Human Services has identified vision services as one its TANF funded services that it provides to needy families.

## VOCATIONAL AND EMPLOYMENT PLACEMENT SERVICES

Educational and vocational training is directly linked with the ability to acquire jobs that pay living wages and is an effective tool in transitioning families to self-sufficiency. Despite the correlation between vocational training and the ability to find and maintain viable employment, only a small percentage of TANF funds are spent on vocational training nationwide.

States have a variety of options in using TANF funds to support vocational training opportunities, but most services provided in this area support activities that can be counted toward achieving high work participation rates. Examples of training activities that can count toward meeting a state's work participation include:

- Providing revenue for employers as an incentive to hire TANF eligible employees. Funds would be used to supplement the employee's wages;
- Providing employment incentives for TANF-eligible individuals who achieved certain work deliverables;
- Providing employment related supplies (uniforms, tools, etc.);
- Supporting Youth Temporary Employment Programs (i.e., summer programs that employ TANF-eligible youth, such as a program in partnership with Parks and Recreation that teaches youth trail maintenance);



- Funds for interview clothing, phone service, or other ways of communicating and job searching (thus ensuring that the family member has the tools to pursue a job and succeed in the interview);
- Funding programs or staff that provide support with resume writing, job search skills/interview skills;
- Paid or unpaid internships/externships and field placements related to a formal training experience; and
- Participating in on-the-job training. Typically, on-the-job training contracts reimburse employers for a portion of the costs associated with providing training and the decreased productivity of the newly hired employee during a specified training period. Participation in a range of education-related activities may also count toward the work participation rates after the first 20 hours of work per week under the all-families rate, or 30 hours per week for the two-parent families' rate.<sup>174</sup>

In addition, states can use TANF funds to support skill building and vocational training for individuals directly and not as a work activity. Support of this nature would have to be shorter (less than four months) or one lump payment of support that is provided with the participant's understanding that the support would not be ongoing. An example of an appropriate short-term support is funding job training at a technical school to promote self-sufficiency through a higher paying job.

While TANF funds are primarily funneled directly to the participant, they can also be used to fund a specific program that will provide job skills and training to low income individuals. For example, TANF funds can be used to provide a class or program such as a weatherization class or a dental hygienist certification program that serves predominantly low income individuals and prepares them for available jobs in the community that require specialized training.

**Purpose Area:** Vocational training programs are primarily appropriate for Purpose Areas 1 and 2.

**Eligibility:** Vocational training programs can be provided to families that are eligible at the following level:

- Supportive Services.

Vocational training programs would be categorized as a non-assistance service and thus can be provided to eligible families in a diversion format or longer term supportive services format.

**More Information:** Colorado has numerous examples of innovative collaborations in expanding vocational training opportunities for low income families.

- "Pueblo County has developed special partnerships with schools and industries in the area to provide education and training opportunities to TANF clients. As part of an effort to train clients to work in "untraditional" industries, they partner with Trinidad State Junior College to offer a nine month certificate in the Energy Production and Industrial Construction (E.P.I.C) program. Graduates of the program are able to obtain jobs in welding or electrical alignment as heavy duty operators. Pueblo also partners with local banks to assist in training clients for bank teller positions. The county provides space for the trainings, which take place on a nightly basis."<sup>175</sup>

**Additional Resources:** The following report is a helpful resource for any program administrators who wish to expand vocational programs in their communities with the support of TANF funding:

- The Center for Law and Social Policy's report, *Strategies for Increasing Participation in TANF Education and Training Activities*. <http://www.hawaii.edu/bridgetohope/downloads/tanfEducation.pdf>

## SPECIALIZED PROGRAMS PARTIALLY FUNDED BY TANF

In addition to the many types of services that can be paid for by TANF to eligible families, TANF also supports some specialized programs. Some of these are programs counties can choose to fund; others are programs the state already funds.

### CHILDCARE AND DEVELOPMENT FUND (CCDF) TRANSFERS

The Child Care and Development Fund (CCDF) is a federal program that focuses on childcare services and quality. It is tied to TANF because it allows TANF families to work or participate in the training programs they need by providing them with high quality childcare services.<sup>176</sup> States receive annual allocations of CCDF funds. In Colorado, the Division of Child Care distributes these funds as grants to the 64 counties. Counties have a great deal of autonomy in how they implement the program.

CCDF is one of two programs (the other is the Social Services Block Grant) that counties can transfer their TANF funds into. However, the total state transfer to CCDF and the Social Services Block Grant (SSBG) combined may not exceed 30% of total TANF dollars. If Colorado chooses, for example, to transfer 10% of TANF funds to the SSBG then the state may only transfer 20% to CCDF. These maximums apply at the state level, but in Colorado, counties can choose to transfer these funds on a local level. So, it is important for counties to work closely with their state partners as they consider transfers of TANF funding into either the CCDF or SSBG at the local level.<sup>177</sup>

Counties can use several options in expanding childcare for low-income parents in their communities. They can either spend TANF directly on childcare, transfer funds to the CCDF to expand CCDF resources for childcare, or contract with a CCDF agency to support childcare programs. If a county transfers funds to CCDF, those funds must be from current year TANF only and can be transferred back to TANF at any time. Once funding is transferred into CCDF, it must operate under all of the CCDF rules and regulations, including 4% being applied toward quality expenditures, state health and safety requirements being met, and staying within the administrative caps.<sup>178</sup>

However, if rather than transferring the funds, the county chooses to contract with their CCDF agency and commingle the funds, both the TANF and CCDF rules will apply. If the TANF agency decides to contract with the CCDF agency, but keeps the funds separate from CCDF funds, only the TANF rules will apply to the TANF funds.<sup>179</sup>

### CHILD TAX CREDIT

The Child Tax Credit (CTC) is a refundable federal tax credit available to low to moderate income families with at least one child under 17. “The CTC is the largest federal tax provision benefiting children. Distributing roughly \$45 billion to 31 million families annually, the tax assistance provided by the credit is equal to the entire federal budget for children and family services programs (excluding health care) administered by the Department of Health and Human Services.”<sup>180</sup> Through the Child Tax Credit, an eligible family can reduce its federal income tax by up to \$1,000 for each qualifying child under the age of 17.

“Foster children, adoptive children, stepchildren, grandchildren and several other categories of relations are all eligible family members when claiming the CTC tax credit. CTC credits do not count as income when determining eligibility for any social safety net programs funded, even in part, with federal dollars. To be eligible a single or married adult must: have a qualifying child under the age of 17; have a taxable income above \$11,000; and have a Social Security Number or Individual Taxpayer Identification Number.”<sup>181</sup>

*The Child Care Tax Credit is a qualifying Maintenance of Effort expenditure for the State of Colorado.*

## COLORADO CHILD CARE ASSISTANCE PROGRAM (CCCAP)

The Colorado Childcare Assistance Program (CCCAP) provides childcare assistance for low-income families that are working, searching for employment, or involved in training. The program specifically provides assistance for TANF families who need childcare services in order to achieve self-sufficiency.<sup>182</sup> The Colorado Child Care Assistance Program is funded through a combination of federal, state, county dollars and parental fees (established by the state).

Colorado Department of Human Services, Division of Child Care, serves as the lead agency and allocates CCCAP funds to Colorado's 64 counties. The funds are administered through county departments of social services. Counties have autonomy in establishing eligibility levels for families, "but must serve families consisting of caretaker relatives caring for children up to 225 percent of the federal poverty level."<sup>183</sup>

*The Colorado Child Care Assistance Program is a qualifying Maintenance of Effort expenditure for the State of Colorado.*

## COLORADO PRESCHOOL PROGRAM

The Colorado Preschool Program (CPP) (formerly known as the Colorado Preschool and Kindergarten Program) was created in 1988 through the Colorado General Assembly "to serve the young children in Colorado who were most vulnerable to starting grade school unprepared."<sup>184</sup> The program targets young children identified with risk factors for learning and was created in recognition that research overwhelmingly demonstrates that "providing quality early childhood education ultimately curbs dropout rates, helps children achieve their full potential, reduces dependence on public assistance, and decreases susceptibility to criminal activities."<sup>185</sup> The number of children who can be served through CPP is capped by the State Legislature. CPP funding is determined by the Colorado Public School Finance formula and is a voluntary program that school districts can opt into.<sup>186</sup> It requires local advisory councils and all providers must be licensed through the Division of Child Care in the Colorado Department of Human Services.

Many TANF eligible families have children who are appropriate for CPP services, as the criteria for children participating in the program focus on: language development needs, receiving services from human services as a neglected or dependent child, eligible for free and reduced lunch, homeless, living with an abusive adult, living with drug and alcohol abuse in the home, teen parents, parents who have not completed high-school, frequent relocation, or challenges with social skills.<sup>187</sup>

*The Colorado Preschool Program is a qualifying Maintenance of Effort Expenditure for the State of Colorado.*

## EARLY HEAD START

The Colorado Early Head Start Program is dedicated to ensuring "healthy prenatal outcomes for pregnant women, enhancing the development of very young children, and promoting healthy family functioning."<sup>188</sup> Funding is derived from a small percentage of Federal Head Start funds and is specific to low-income women who are pregnant and/or have children under the age of three, or disabled children under the age of five.<sup>189</sup> Early Head Start evolved from the Head Start Programmatic model in recognition that providing support and resources to ensure healthy infant development yields long terms results in an infant's future cognitive, emotional, social, and behavioral wellbeing.

Early Head Start is another mechanism for local counties to provide child care services to TANF families. TANF can contract directly with Early Head Start for services or the services could be provided under the existing funding for the program.

## EARNED INCOME TAX CREDIT

The Earned Income Tax Credit (EITC) is a refundable federal tax credit designed to benefit low and moderate income families. The tax supplements the wages of low-income workers, primarily those with children, and reduces the burden of payroll taxes. In 2010, a worker with one qualifying child could receive a refundable credit of up to \$3,050. With two qualifying children, this amount goes up to \$5,036.<sup>190</sup>

Cash benefits provided to TANF participants who are involved with work experience and community service programs are not counted as income in determining eligibility. However, “current or former recipients who are employed in private or public sector jobs for which employers are subsidized through state welfare block grants or other government programs do earn wages that count in determining eligibility for the EITC and Child Tax Credit.”<sup>191</sup>

*The Earned Income Tax Credit is a qualifying Maintenance of Effort expenditure for the State of Colorado.*

## LOW-INCOME ENERGY ASSISTANCE PROGRAM (LEAP)

The Colorado LEAP program provides support for home heating costs for low-income families during the winter months. The program is federally funded and while the state provides oversight, the program is administered on a county level. The program runs November 1 through April 30<sup>th</sup> and is not available during Colorado’s summer months. The program is recommended for TANF case workers as a resource their families may need to further supplement their incomes by covering a critical expense.

While LEAP serves as one of Colorado’s qualifying Maintenance of Effort expenditures, the state does not “count toward its TANF MOE requirement any expenditures used to receive Federal LIHEAP Leveraging Incentive Funds.”<sup>192</sup>

## COLORADO CRISIS INTERVENTION PROGRAM (CIP)

The *Colorado Crisis Intervention Program* (CIP) is a complimentary program to Colorado’s Low-income Energy Assistance Program (LEAP). CIP helps low-income families and individuals address emergency energy related expenses by specifically assisting with the repair, maintenance, and replacement of primary heating source such as furnaces and/or windows. Eligibility is identical to LEAP and enrollment is done through the same local agencies as LEAP.<sup>193</sup> CIP support is available year-around, unlike the LEAP program’s seasonal support. CIP services are appropriate for TANF families.

## NURSE FAMILY PARTNERSHIP PROGRAM

Colorado’s Nurse Family Partnership Program (also known as the Nurse Home Visitor Program) is aligned with all of TANF’s key goals:

- “Targeting first-time mothers beginning during pregnancy and continuing until the child’s second birthday, the Nurse-Family Partnership model utilizes registered nurses to improve pregnancy outcomes. In doing so, it strives to promote health-related behaviors; improve child health, development, and safety by

promoting competent care-giving; and encouraging pregnancy planning, educational achievement, and employment.”<sup>194</sup>

- The Nurse Family Partnership Program is a state-wide initiative, serving families in 52 of Colorado’s 64 counties. The program is provided through 19 agencies, including public health departments, community health centers, community nursing agencies, and hospital systems.<sup>195</sup> In addition, the program plays a vital role in Colorado’s TANF Program by providing critical maintenance of effort funding. The Nurse Family Partnership Program is one of Colorado’s primary Maintenance of Effort qualifying expenditures. In Colorado, the Nurse Family Partnership is funded through tobacco settlement proceeds and supplemented with a federal Medicaid match.
- At the local level, home visitation services like the Nurse Family Partnership Program are appropriate for TANF funding. For example, if a local Nurse Family Partnership Program has insufficient funds to meet the needs of TANF families, the TANF office can choose to contract with the program to expand the number of families served. The program would need to track eligibility of families for TANF services.

## **SOCIAL SERVICES BLOCK GRANT (SSBG OR TITLE XX)**

Social Services Block Grants (SSBG) (also known as Title XX of the Social Security Act) are federal grants allocated to the States annually to “help them achieve a wide range of social policy goals, which include preventing child abuse, increasing the availability of childcare, and providing community-based care for the elderly and disabled.”<sup>196</sup> The funding amount awarded to each state is based on the state’s population. Similar to TANF, States have broad discretion over the use of SSBG funds. The funds must, however, be used to meet one of five statutory goals:

- “Achieving or maintaining economic self-support to prevent, reduce, or eliminate dependence;
- Achieving or maintaining self-sufficiency, including reduction or prevention of dependency;
- Preventing or remedying neglect, abuse, or exploitation of children and adults unable to protect their own interests, or preserving, rehabilitating or uniting families;
- Preventing or remedying inappropriate institutional care by providing for community-based care, home-based care, or other forms of less intensive care; and
- Securing referral or admission for institutional care when other forms of care are not appropriate or providing services to individuals in institutions.”<sup>197</sup>

## COLLABORATIVE USES OF TANF

As demonstrated throughout this Guide, TANF is a funding stream with tremendous potential to fund services that are critical to help families achieve self-sufficiency. Though the families in any given county could benefit from the full array of services listed in this Guide, no county TANF program can fund all of the services listed. In identifying strategies for building service capacity in your county, collaboration between TANF agencies and other funding streams, agencies, and non-profits will allow for a wider array of necessary and helpful services to be funded.

### CONTRACTING WITH COMMUNITY PROVIDERS

Many counties contract with non-profits and other government agencies to provide services to youth and families in their communities. Contracting out services has many advantages, including:

- **Flexibility:** Counties can shift their contracts yearly based on the needs in their community, rather than developing inflexible infrastructure internally to address needs that may be less important over time;
- **Quality:** Non-profits who specialize in providing a specific array of services may have better quality and capacity than can easily be recreated in a county TANF agency;
- **Avoid Duplication:** In communities with limited resources, contracting with non-profit organizations who already provide a service decreases the duplication of services; and
- **Accessibility:** Some youth and family members may not be willing to approach the Department of Human or Social Services for support, but are willing to approach a local non-profit.

When a county chooses to contract out their services, it is critical that the contracts are carefully executed to ensure the non-profit is providing appropriate services to eligible populations. In the process of developing the contract, county TANF agencies must clearly indicate in the contract the:

- TANF Purpose Areas that services will be provided under;
- Eligible populations for the services, including separate eligibility if some services are provided under one Purpose Area and others under another Purpose Area;
- Tracking of eligibility required by the contractor; and
- Reporting requirements from the contractor.

It is highly recommended to provide the contractor with TANF eligibility forms specific to the Purpose Areas and eligibility of the population they will be serving. Reporting requirements should include submission of the TANF forms. Additionally, contractors should work with the local TANF agency to establish appropriate mechanisms for ensuring confidentiality of eligibility information.

### BLENDING & BRAIDING YOUR TANF

Blending and braiding are fiscal coordination techniques that allow programs to fund a broader array of populations and services than could be provided through a single funding stream. For an in-depth review of fiscal coordination and how-to guides, see the Colorado Guide to Blending & Braiding (available at: <http://sparkpolicy.com/fiscalguides.htm>). In Colorado, TANF has the potential to blend and braid in many types of programs, due to its unique level of flexibility in both the eligibility for services and the allowable services.

**Flexibility in Eligibility:** As described in the eligibility section, some services are limited to those individuals who are eligible due to very low incomes, but most services are appropriate for families with dependent children



under \$75,000 (Supportive Services eligibility level). In many rural counties, this broad definition of eligibility will cover almost all families in the county. When services fall under Purposes 3 and 4, eligibility is even broader.

Due to this flexibility, TANF can help sustain and expand programs at the local level when it is braided with more restrictive funding streams. For example, a parenting program delivered through child welfare may be relevant to families not yet involved in child welfare. By funding the program through child welfare and TANF dollars, more families will be able to access it without becoming involved with the child welfare system.

***Flexibility in Services:*** As described in previous sections, TANF can fund a very wide range of services, allowing for tremendous flexibility in how individual family needs are met and how community needs are met.

Due to this flexibility, TANF can be invaluable in supporting programs that otherwise might be less comprehensive in their approach. For example, a juvenile justice program might have funding for substance abuse prevention and mental health treatment, but only for the youth involved with the juvenile justice system. By funding the program partially through TANF dollars, services could be expanded to include family counseling and parenting classes, ensuring the high-risk youth have supportive environments at home.

To utilize local TANF funds in a braided or blended model, it is important to ensure the program being funded has the capacity to track eligibility of participants, report services provided across all funding streams, and break service costs out by funding stream if the other funding sources require it. Some non-profits will need technical assistance on administrative and tracking practices from their local TANF office as they learn to blend and braid funding to expand the availability of their programs.

## USING TANF FUNDING FOR SYSTEMS CHANGE

TANF is one of the more flexible funding streams in many local communities. Consequently, it can play a unique role in supporting systems change initiatives. Systems change is when multiple service systems come together to reform their approach to meeting the needs of their overlapping populations. For example, the mental health and child welfare systems might come together to create a more coordinated, early-intervention model that utilizes strategies for identifying and intervening with families who have mental health needs before children are removed from the home. Or, many more systems could come together to develop a community-wide systems change initiative that engages all human service partners, public health, mental health, substance abuse, education, workforce development, and more. Regardless of the scope of the systems change effort, TANF can be a key component to developing a flexible, prevention-oriented service delivery array that is often a key component of such change initiatives.

In identifying the role for TANF, it is important to carefully consider how the populations served by the partner systems fit into the four Purpose Areas and eligibility levels. If the population being served is appropriate for TANF funding, the next step is to determine the services and supports needed by families, including the potential for flexible, individualized services. As these needs are identified, similar to the above description of blending and braiding, TANF may be a good fit for some services, while other funding streams would fund other services.

Often TANF is the funding stream that allows for the early interventions with families to keep children in the home and ensure economic stability, while other funding streams step in for families who are struggling more. TANF can also be an excellent funding stream for crisis services that intervene prior to a family's eligibility for other funding streams being determined.

Regardless of how TANF funding is used to support systems change, it is important to track eligibility of populations served and appropriateness of services under Purpose Areas.

## APPENDIX A: TANF DEFINITIONS

The following terms are used throughout the Guide and are fully defined within the Guide as noted.

**NEEDY:** Fully defined on page 14.

In Colorado, “needy” is defined as a family unit with an income less than \$75,000 per year.

The term “needy” is used in the first two TANF Purpose Areas 1 and 2 and is legally significant in that a state must establish specific financial eligibility guidelines to describe “needy” families.

**FAMILY OR FAMILY UNIT:** Fully defined on page 14.

A family unit is a family consisting of children within the 5<sup>th</sup> degree of kinship living with a caretaker relative or parent(s) with unborn child(ren); residing legally in the United States. A family unit can also include a single mother or couple who are expecting a child. Children living with non-relatives would not be eligible for support.

**ASSISTANCE:** Fully defined on page 15.

Cash, payments, vouchers and other forms of benefits designed to meet a family’s ongoing basic needs (i.e., for food, clothing, shelter, utilities, household goods, personal care items, and general incidental expenses) even when conditioned on participation in a work experience or community service activity.

**NON-ASSISTANCE:** Fully defined on page 16.

Benefits and services that do not fall within the definition of assistance, such as services that do not function as income support, a wide range of supportive services, and short-term, non-reoccurring services. Non-assistance services do not trigger the TANF requirements outlined above (60 month time limit, work participation, the assignment of child care rights).

**BASIC CASH ASSISTANCE:** Fully defined on page 22.

Basic Cash Assistance is direct cash payments or vouchers provided to TANF eligible families for more than four months (these payments are separate and distinct from a County or State Diversion Program) to support ongoing basic needs such as food, clothing, or shelter. Eligibility at the Basic Cash Assistance level comes with many requirements including a 60 month time limit; work participation; and the assignment of child support rights.

**SUPPORTIVE SERVICES:** Fully defined on page 25.

This TANF guide uses the term “supportive services level” to categorize a TANF eligibility level. Supportive Services are services that fall outside of benefits that are specifically required to meet ongoing basic needs (in essence, non-assistance services). Supportive services can include a broad array of non-assistance services from case management to life skills curriculums for at-risk youth to financial management classes for young families. Supportive services have the advantage of not triggering the federal requirements of the 60 month TANF clock, the work participation agreement, child support assignment and comprehensive data reporting.

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