



**State of Florida
Department of Children and Families**

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Governor

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Secretary

DATE: October 28, 2009

TO: Regional Directors

FROM: Alan Abramowitz, State Director of Family Safety Program Office

SUBJECT: Policy Clarification - Determining TANF Eligibility for Children in Institutional Investigations in FSFN

PURPOSE: This document provides guidance for determining Temporary Assistance to Needy Families (TANF) eligibility for children involved in child care or school institutional investigations, or in child on child special conditions referrals in FSFN.

POLICY: TANF funds help pay for administrative costs (such as salaries) for the Florida Abuse Hotline, protective investigation and case management staff. Consistent with CFOP 175-93, TANF Uses in Child Welfare/Community Based Care, and existing contractual agreements with community based care lead agencies and sheriff's offices providing investigative and case management services, a Request for TANF/Eligibility Determination is required for all investigations of child abuse or neglect reports sent to the circuits or community-based care lead agencies. This also includes children involved in child care or school institutional investigations, or in child on child special conditions referrals.

The eligibility determination is a two-step process.

- Step 1 involves the protective investigator or case manager gathering and inputting the necessary information to complete the Request for TANF Funds/Eligibility Determination application in FSFN.
- Step 2 involves the supervisor or designee. The supervisor completes the eligibility determination by answering whether the income is below or at/above the 200% of federal poverty level, signing, and dating the application.

When the child resides with his/her parent(s) or legal guardian at the time of the initial determination and/or redetermination of TANF eligibility, the child's family who are living together with the child as one economic unit must be included on the TANF form. If a child is residing in a court ordered legal guardianship, the guardian's income counts the same as if a parent. All the income of the child and child's family counts when determining initial eligibility.

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Mission: Protect the Vulnerable, Promote Strong and Economically Self-Sufficient Families, and Advance Personal and Family Recovery and Resiliency

Children residing with a specified relative, i.e., someone other than the parent(s) or legal guardian, at the time of the initial TANF determination and/or redetermination, are considered as a "family of one." Only the income of the child counts. (Refer to CFOP 175-93, TANF Uses in Child Welfare/Community Based Care, chapter 1 for a list of specified relatives).

FSFN PROCESS: The Florida Safe Families Network (FSFN) requires a TANF determination as a part of each child investigation including institutional investigations and special conditions referrals. The TANF 200% eligibility form must be completed and eligibility determined by the Child Protective Investigations Supervisor in order to close the investigation.

a.) Determining TANF eligibility for children in institutional investigations involving child care or school settings or for children in child on child special conditions referrals. The child's family (as described in the Policy above) must be included in the eligibility determination. The process is as follows:

- Determinations for alleged child victims in child care or school settings differ from other institutional TANF determinations because the children do not reside in the child care or school setting. These children reside with their families; therefore, the families *must* be a part of the eligibility determination. This includes the child's parent(s) or legal guardian, and siblings (whether or not an alleged child victim) living in the home with the child.
- Children living in residential facilities on a full time basis, however, are evaluated as a "family of one".
- Due to existing FSFN programming parameters, the Child Protective Investigator (CPI) completing these types of investigations must first generate the CASE TANF and, second, generate the INVESTIGATION TANF determination. Otherwise, the Investigation TANF will be "pending" and will not allow the Case TANF to be approved.
- A TANF determination is completed on children who are alleged child victims, not on other children in the child care or school settings who are not specifically named in the investigation as alleged child victims, unless they are siblings residing in the household of alleged child victims. Siblings residing in the household of an alleged child victim must be included on the alleged child victim's TANF determination whether or not they were present in the institution where the abuse is alleged to have occurred.
- The family of each alleged child victim, to include siblings and other related household members, must be added to the "FSFN Case" as CASE participants in order to accurately determine TANF eligibility.

b.) Determining eligibility for a child in a child care or a school setting. The Child Protective Investigator (CPI) must first create the CASE TANF determination as described above. The process is as follows:

- Create Case work, then select TANF from the Eligibility dropdown;
- Create one determination per child, but include the parents/caregivers, siblings of the child victim and other household members;
- The "Eligibility from" date will be the "Intake" date;
- Complete and Submit the CASE TANF form for approval;
- Approval will follow the standard FSFN approval process (My Approvals);
- Prior to submitting the Investigation for closure, the CPI must create the INVESTIGATION TANF;
- The INVESTIGATION TANF will be applied for the youngest child as a family of one (include only the child);
- Set the "Effective from" and "Effective to" dates to be the same day, using the date the Intake was received at the Hotline;
- Save the work;
- Complete remaining Investigation processes and submit for closure.

Helpful hints regarding the Investigative TANF process:

- The four TANF eligibility questions will be answered via the yes/no radio buttons.
- The income claim will be zero.
- The "Removal date" shown on the FSFN screen is not relevant to the Investigative TANF process. The relevant date for the Investigation is the "Intake" date, which is the same as the "Effective" date.
- Approval is complete upon investigation closure.

c) Determining eligibility for Child on Child Special Conditions Referral. Child on Child Special Conditions referrals involve alleged sexual activity between minor children. A TANF 200% eligibility form must be completed on each named alleged child victim in the investigation or referral. The process with an example is as follows:

For example, a Child on Child report is received involving an alleged juvenile sexual offender and one known alleged victim child. The children are residing in separate family homes and are not in an institutional setting. Subsequent investigation reveals no other child victims.

Two CASE TANF determinations are completed: (1) one for the alleged juvenile sexual offender and his/her parent(s) or legal guardians, siblings and any other related household members, and (2) one for the alleged child victim and his/her parent(s) or legal guardians, siblings and any other related household members.

An Investigation "child of one" TANF eligibility determination form is completed for the youngest alleged child victim, if there is more than one alleged child victim. The Investigation TANF determination is completed and provided to the Child Protective Investigator Supervisor for approval through the standard approval process.

ACTION REQUIRED: Please share this with all Family Safety, community-based care, and sheriff's offices staff with responsibility for completing TANF eligibility determinations, documenting, and reviewing TANF eligibility. Additionally, please encourage staff to become familiar with existing TANF policy and procedures. Some examples include Children and Families Operating Procedure 175.93, FSFN topic papers, FSFN "How Do I..." guides, and the Frequently Asked Questions posted on the CENTER for the Advancement of Child Welfare Practice.

CONTACT INFORMATION: Please direct questions to Chris Compton at Chris_Compton@dcf.state.fl.us, telephone (850) 922-2425; Linda D. Johns at Linda_D_Johns@dcf.state.fl.us by telephone at (850) 414-9982, or Mukweso Mwenene at Mukweso_Mwenene@dcf.state.fl.us or telephone (850) 922-0510.

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