

Implementing Welfare Reform Requirements for Teenage Parents: Lessons from Experience in Four States

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Mathematica Policy Research, Inc.
for
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CONTENTS

VOLUME I: SUMMARY REPORT

I. EXECUTIVE SUMMARY

- Identifying Teenage Parents
- School Attendance Requirements
- Living Arrangement Requirements

II. INTRODUCTION

- Teenage Parent Requirements under Tanf
- Teenage Parent Requirements Prior to Tanf
- Challenges Associated with the Requirements
- Study Objectives
- Selection of the Four Study States
- Characteristics of the Four Study States
- Data Sources

III IDENTIFICATION OF TEENAGE PARENTS

- Identification and Computer Data Systems
- Identification and Local Welfare Staff
- Strategies for Improving Identification
- Tanf and the Identification of Minor Parents

IV SCHOOL ATTENDANCE REQUIREMENTS

- Decisions for States
- Implementation Lessons

[V MINOR PARENT LIVING ARRANGEMENT REQUIREMENT](#)

- Decisions for States
- Implementation Lessons

[VI CONCLUSION](#)

[REFERENCES](#)

TABLES

[1 Selected Characteristics of the Four Study States](#)

[2 School Attendance Policies in Four States](#)

[3 Minor Parent Living Arrangement Policies in Three States](#)

VOLUME II: CASE STUDIES

- A. [ARIZONA](#)
- B. [CALIFORNIA](#)
- C. [MASSACHUSETTS](#)
- D. [VIRGINIA](#)

[References used in case studies.](#)

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I. EXECUTIVE SUMMARY

Current federal welfare policy requires minor custodial parents receiving cash assistance to attend school and live with their parents or in an adult-supervised setting. Congress established these requirements as part of the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA), which created the program for Temporary Assistance for Needy Families (TANF) and abolished the Aid to Families with Dependent Children (AFDC) program. While we have little ability to examine how these requirements are being implemented under TANF at this early date, we can observe how several states implemented similar requirements under federal waivers.

This report summarizes lessons based on an examination of the operational experiences in four states that implemented school attendance and living arrangements requirements using federal waivers under the prior AFDC program. The four states are Arizona, California, Massachusetts, and Virginia. The report draws lessons in three areas: (1) identifying teenage parents, (2) implementing school attendance requirements, and (3) implementing living arrangement requirements.

IDENTIFYING TEENAGE PARENTS

Implementing policies and programs that target teenage parents requires, first of all, the ability to identify them. The new federal TANF regulations require states to deny cash assistance to unmarried minor custodial parents who do not live in an adult-supervised setting and who do not attend school regularly if they do not yet have a diploma or its equivalent. Therefore, compliance with TANF may require some states, which previously had no operational need to identify minor parents, to develop the capability to identify this population. Moreover, states may want to target supportive services to this high-risk population. Many teenage parents face substantial obstacles to future success: unsupportive home environments, social isolation, long-standing poor school performance, lack of role models from whom they can learn parenting and other life skills, and struggles over child care. If state

welfare agencies want to provide meaningful assistance to help teenage parents meet the new requirements, they must be able to identify teenage parents and refer them to the necessary support services.

Identifying teenage parents, particularly those on someone else's grant, can be a major challenge.

Welfare policies that apply specifically to teenage parents pose a special challenge, because many young parents do not head their own cash assistance case. When an assistance case includes an older adult, an adolescent, and a very young child, it is often unclear whether the adolescent or the older adult is the parent of the young child. Income eligibility staff must identify relationships among the household members, record these relationships, and act upon the information appropriately. Since minor parents are a relatively small proportion of most welfare caseloads, staff may have no opportunity to become proficient in applying the complex rules to them. Data systems that record the characteristics of parent-child relationships among all case members greatly facilitate identifying teenage parents, especially those who receive assistance as a member of someone else's grant. If existing data systems do not provide this support and cannot easily be modified, staff effort can compensate.

Several strategies can help identify all teenage parents. Programs can pursue strategies that support the efforts of busy staff in applying complex rules to a small proportion of their caseload. Among the strategies we observed are (1) persistent staff training to correct errors, (2) use of alternative information sources to identify teenage parents eligibility workers may not have identified and referred, and (3) establishing positive incentives for identifying and referring all teenage parents.

Attendance policies covering all school-age minors allow TANF compliance without identifying minor parents. Requiring ***all children*** in families receiving cash assistance to attend school as a condition of assistance eliminates the need to identify teenage parents in order to enforce a school attendance requirement. If all school-age minors--including those who are custodial parents-- must attend school, then the TANF requirements can be met without separately identifying minor parents. Such policies, however, may sacrifice the capacity to target teenage parents for special services that support school attendance.

SCHOOL ATTENDANCE REQUIREMENTS

States may not use TANF block grant funds to provide financial assistance to unmarried minor custodial parents who do not have a high school diploma or its equivalent unless they are attending school. To meet this requirement, state welfare agencies must define school attendance requirements, obtain attendance information, and follow up with teenagers who fail to attend school. Several lessons emerged from the experiences of the study states in implementing school attendance requirements.

A range of education options, including GED programs, should be available.

General Equivalence Degree (GED) programs are important for meeting the educational needs of teenage parents, especially those who have dropped out of school. Because many teenage parents leave school before giving birth and others do so shortly after, providing programs for youths who have dropped out of school is important for implementing a meaningful school attendance requirement. A substantial number of teenagers attend and complete high school after becoming parents. However, many teenage parents prefer GED programs over regular high school programs as a faster and more flexible route to a high school credential. Directly funding GED programs for teenage parents is a way for welfare agencies to ensure that suitable school placements are available for teenage parents receiving cash assistance. The capacity of public education to serve school dropouts, especially those who are parents, varies greatly from place to place. GED programs can ensure that a program is available. Such programs also can build in a variety of supportive elements (such as parenting education, life skills training, and child care). These program elements may not be critical for the average adult learner, but they are important for young parents.

Programs must determine the focus and scope of case management in light of goals and costs.

To implement a school attendance requirement, a welfare agency must have a system for managing individual cases. This system must gather information about attendance and, if attendance is unsatisfactory, take action to change the grant. In addition, an agency may decide to provide other services that support students' efforts to attend school, such as: (1) help in selecting a suitable program or arranging child care; (2) assessing needs for and securing other services such as housing, health care, and counseling; and (3) providing practical help in solving problems.

Conducting case management for teenage parents through existing systems developed for the AFDC and JOBS programs allows states to build directly on existing staffing and data management systems. However, these systems only monitor teenagers enrolled in school every six months and, therefore, may not identify attendance problems promptly enough to prevent the teenagers from dropping out.

Concentrating all case management functions--including administration of the cash grant--with specialized eligibility workers who work exclusively with cases involving a teenage parent streamlines information flow and allows for the development of specialized knowledge in working with teenage parents. This approach, however, requires staff flexibility, care in delineating the responsibilities of these specialized eligibility workers, and training to allow staff to handle new responsibilities.

Intensive case management requires small caseloads and specialized staff.

Incorporating intensive case management into the responsibilities of a case manager of a teenage parent allows the agency to provide intensive, long-term personal support across a range of areas for the teenage parent and her child. Such support, provided through the public health system, has been found to improve birth outcomes and the health of young families (Smith et al. 1990). The approach, however, requires highly trained staff whose background and orientation differ from that of eligibility workers and JOBS case managers. Intensive case management is relatively expensive because caseloads per worker must be small (40 cases or less in programs we observed). Implementation requires developing staff capability or forging working relationships with agencies outside the income assistance agency.

Monitoring attendance increases welfare agency workload, sometimes substantially.

States must plan for additional staff time in which to monitor school attendance, whether they monitor the attendance of all students receiving cash assistance or just teenage parents' attendance. The amount of staff time will depend on how case management is organized and integrated with the work of eligibility workers, how data systems support information flow, and the other duties assigned to teenage parent case managers.

Monitoring attendance can complicate the relationship between welfare agencies and schools.

Many local welfare agencies and schools have not previously worked together. Schools may be reluctant to monitor school attendance of welfare recipients because they do not consider it part of their mission to enforce welfare agency policy. Welfare agencies must also address school districts' concerns about the burden on their staff time and the privacy of their students. Focusing the attendance requirement on teenage parents and making the teenage parents responsible for securing reports on their attendance will reduce the burden on schools and eliminate concerns about privacy.

LIVING ARRANGEMENT REQUIREMENTS

States may not use TANF funds to provide assistance for unmarried minor custodial parents unless they are living with an adult relative or legal guardian, or unless certain exceptions apply. This requirement necessitates procedures for monitoring the living arrangements of minor parents and for determining when exceptions to the requirement serve the well-being of the teenage mother and her baby. The experiences of the states studied illustrate several lessons concerning implementation of living arrangement requirements.

A very restrictive living arrangement requirement may create implementation

difficulties.

Current federal law requires that, except in certain limited circumstances, unmarried minor custodial parents must live with a parent, adult relative, or legal guardian as a condition of receiving cash assistance. One state in the study initially required that a minor parent live with a parent, if at all possible. Living with a grandparent was not an acceptable arrangement unless there was a substantiated claim against the parent of abuse or neglect. This policy was problematic, however, because in some cases it disrupted stable living arrangements. Concerns of local agency staff about the problems this created for clients led state policymakers to make the policy more flexible.

Funding group homes may enable states to have fewer exceptions to the requirement. The option of group homes enables welfare staff to enforce a strict policy in which few exceptions are granted, while at the same time assuring a safe alternative for young mothers if their parental home is unsafe. Without a group home option, welfare officials must pursue one of three approaches to dealing with situations in which a minor parent has no adult relative or legal guardian with whom she can live: (1) allow more minor parents to live independently; (2) accept a broader interpretation of what constitutes an acceptable adult-supervised arrangement; or (3) accept that some minor parents who do not meet the state's requirements will be denied cash assistance.

Group homes offer a safe, structured, and supportive environment; even so, only a small fraction of teenage parents may choose to reside in them.

Like intensive case management for teenage parents and school programs tailored to their needs, supervised group living arrangements are a way to provide support for young parents who lack constructive involvement with peers and adults. Yet the experience of one study state suggests that only a small percentage of teenage parents will use this option even when it is readily available. For this reason, although the costs per client housed in group homes can be high, the overall cost of providing this option for teenage parents may be relatively modest. If the proportion of teenage parents residing in group homes increases, however, overall costs will also increase.

Implementing Welfare Reform Requirements for Teenage Parents: Lessons from Experience in Four States

II. INTRODUCTION

Congress and the President abolished the AFDC program in August 1996. The PRWORA replaced AFDC, which created an entitlement to financial assistance for single-parent families with children, with federal block grants to states for TANF, in which no entitlement exists.⁽¹⁾ States have wide latitude in designing their TANF programs; however, they may not use TANF block grant funds to provide financial assistance to unmarried minor custodial parents who do not have a high school diploma or its equivalent unless they are attending school. Moreover, states may not use TANF funds to provide assistance for unmarried minor custodial parents unless they are living with an adult relative or guardian.

The PRWORA requires that many states implement new procedures for their teenage parents receiving cash assistance. State welfare agencies must identify the minor custodial parents in their caseload, define school attendance requirements, obtain attendance information, and follow up with teenagers who fail to attend school. The requirement that minor parents live with an adult relative or guardian necessitates new procedures for monitoring the living arrangements of minor parents, as well as procedures for determining when exceptions to the requirement serve the well-being of the teenage mother and her baby.

Before Congress enacted federal welfare reform legislation, several states had implemented similar school attendance and living arrangement requirements for teenage parents under waivers to their AFDC programs. To ensure that other states have the benefit of this experience, the office of the Assistant Secretary for Planning and Evaluation (ASPE), in the U. S. Department of Health and Human Services (DHHS), contracted with Mathematica Policy Research, Inc. (MPR) to examine teenage parent programs in four states that have implemented school attendance and living arrangement requirements as part of state welfare reform demonstrations. This report presents the operational lessons gathered from Arizona, California, Massachusetts, and Virginia in implementing school attendance and living arrangement requirements for teenage parents receiving cash assistance.

TEENAGE PARENT REQUIREMENTS UNDER TANF

Women who give birth before age 18 have lower educational attainment than other women and are more likely to become long-term welfare recipients (Ribar 1996; Klepinger et al. 1995; and Bronars and Grogger 1995). Moreover, their children have lower cognitive abilities, are more likely to drop out of school, and are more likely to become teenage parents themselves than the children of older mothers (Moore et al. 1997; and Havemen et al. 1997). The poor

economic and educational outcomes of very young mothers and their children led Congress, when drafting the PRWORA, to identify minor parents as a population requiring special attention.

TANF School Attendance Requirement

Under the PRWORA, a state may not use TANF block grant funds to provide assistance to an unmarried custodial parent under age 18 who does not have a high school diploma or its equivalent unless the parent participates in an appropriate educational activity. Educational activities permitted under this requirement include those "directed toward attainment of a high school diploma or its equivalent" or "an alternative educational or training program that has been approved by the State."⁽²⁾ States may exclude minor parents with children under 12 weeks of age from the attendance requirement.

TANF Living Arrangement Requirement

The PRWORA also specifies that states may not use TANF block grant funds to provide assistance for unmarried custodial parents under age 18 unless they live with a parent, adult relative, or legal guardian. The legislation allows exceptions to this requirement if (1) no parent, legal guardian, or other appropriate adult relative is living, can be located, or will allow the minor parent and child to live in his or her home; (2) the state welfare agency determines the minor parent or child "is being or has been subjected to serious physical or emotional harm, sexual abuse, or exploitation" in the home of the parent or legal guardian; or (3) "the state welfare agency otherwise determines it is in the best interest of the minor child to waive the requirement."⁽³⁾ The legislation does not provide funding for group homes for minor parents. It does, however, direct the state welfare agency to provide or assist minor parents in locating a group home or other alternative adult-supervised setting when they are unable to live with an adult relative or guardian.

TEENAGE PARENT REQUIREMENTS PRIOR TO TANF

Prior to TANF, under waiver provisions of the AFDC program, several states had received approval from DHHS to implement (1) a school attendance requirement covering teenage parents, (2) a requirement that minor parents live with an adult relative or guardian, or (3) both. For example, 26 states received waiver provisions under their old AFDC programs designed to foster school completion by establishing financial incentives for teenage parents to complete their high school education. States most often have created incentives by tying the level of AFDC benefits to satisfactory school attendance. Benefits are reduced if the teenage parent leaves school before completing high school or fails to meet a specified attendance standard. In a few states, teenage parents can also receive a benefit increase if they comply with the attendance requirement. In some states, special bonuses are paid when teenage parents graduate from high school; in others, incentives to complete high school or attend

school regularly are applied to all school-age children, not only to teenage parents.

Prior federal regulations allowed states, under specified conditions, to require, without receiving waiver approval from DHHS, that minor parents receiving AFDC live with a parent or guardian or in some other supervised living arrangement. Several states have exercised this standard option. Other states have received waivers to limit the exemptions from the minor parent living arrangement provision allowed under the standard state option.

CHALLENGES ASSOCIATED WITH THE REQUIREMENTS

These requirements create new challenges for young mothers receiving cash assistance. Some states have implemented, along with the new eligibility requirements, services to help teenage parents respond to these challenges. These services may include special life skills training, instruction in parenting skills and pregnancy prevention, academic classes and tutoring, help in finding and paying for child care and transportation, and special attention to obtaining child support orders and support. A few states have funded group homes for teenage parents as an alternative adult-supervised living arrangement when the parental home is found to be unsafe for the young mother or her baby. In many programs, case managers work with teenage parents to identify their special needs and help arrange needed services, motivate them to comply with program requirements, and trigger changes in financial benefits (as sanctions or rewards) based on teenage parents' response.

The requirements also create challenges for the agencies administering the AFDC and TANF programs. They must establish clear definitions that distinguish compliance from noncompliance. They must develop workable procedures for obtaining timely information to determine whether teenage parents are meeting requirements. Staff members must be trained and supervised to ensure that teenage parents are identified, compliance is monitored, and action is taken consistently and promptly when noncompliance is detected. Adequate resources must be made available to ensure that support services intended to facilitate the desired behavior can be delivered.

STUDY OBJECTIVES

This study examines the development, implementation, and operation of programs that have required teenage parents to attend school and live with an adult relative or guardian. It addresses questions in three areas:

How are eligible teenage parents identified?

What manual and computer-assisted methods are used to identify teenage parents subject to the new requirements, particularly minors receiving cash assistance on someone else's case? Did computer data systems have to be adapted to facilitate identification of teenage parents?

What roles do particular staff members play in identifying teenage parents? Once teenage parents are identified, are they referred promptly to the appropriate programs and services? What strategies have welfare agencies developed to ensure complete identification and referral of eligible teenage parents?

How is the school attendance requirement operationalized and monitored?

What educational programs can be used to fulfill the requirements? How is attendance monitored? What steps are taken when a teenage parent fails to comply? Are special services (such as specialized teenage parent case managers) provided to help teenage parents comply with the attendance requirement? How are child care needs addressed? Are other supportive services (such as transportation and life or parenting skills training) available?

How is the living arrangement requirement operationalized and monitored?

What living arrangements are allowed for minor parents receiving cash assistance? Are minor parents ever allowed to live independently? If so, under what circumstances? How is a determination made that the home of a parent or relative is not suitable? Are teenage parents group homes available to minor parents unable to live with their parents? How is compliance with this requirement monitored?

SELECTION OF THE FOUR STUDY STATES

Four states participated in the study: Arizona, California, Massachusetts, and Virginia. In selecting states for the study, we considered, and balanced, several analytic and policy objectives.⁽⁴⁾ First, within the past few years, each of the four study states has implemented a school attendance or living arrangement requirement covering teenage parents receiving cash assistance. Second, at the time we conducted site visits and data collection, all four states had been operating under the policies for at least a year, which allowed us to observe the experiences of states that had actually implemented the policies. Third, these states' experiences with their teenage parent programs and provisions had not been well documented in previous research.

Because the purpose of the study is to examine operational issues arising from the imposition of both school attendance and living arrangement requirements for teenage parents, a fourth objective was to choose states that had implemented both policies. Three of the four study states have imposed both requirements. The exception is California, which did not implement a minor parent living arrangement requirement until 1997. We considered California a good candidate for the study, however, because of a fifth study objective: to examine states that have implemented innovative approaches to serving teenage parents. The state's mandatory school attendance program, Cal Learn, offers an unusual approach to the school requirement. Unlike programs in the other study states, Cal Learn focuses on academic performance rather

than attendance, offering bonuses to teenage parents who earn good grades and imposing sanctions on teenage parents with poor grades or those who do not attend school at all.

We were particularly interested in including Virginia in the study because of a sixth objective: to examine states that have chosen different approaches to serving teenage parents. Unlike the other study states, Virginia has a broad attendance requirement that covers all school-age minors, not just minor parents. Inclusion of Virginia in the study allows us to examine the implementation experience of a state that has chosen a common approach to mandatory school attendance. Of the 26 states that had waivers approved by July 1996 to impose a school attendance requirement, 16 had mandates covering all minors (or, in some cases, all teenagers), whereas just 10 required school attendance only of teenage parents. Because of the frequency with which states chose to require school attendance of all minors through waivers, we considered it important to examine a state that had used this approach.

CHARACTERISTICS OF THE FOUR STUDY STATES

As Table 1 illustrates, the four study states are quite diverse. Arizona is a medium-sized state with one of the highest teenage birth rates in the nation. Relatively poor in terms of both per capita income and percentage of its population living below the poverty level, the state offers low cash assistance benefits. California contains more people and provides cash assistance to a larger proportion of its population than any other state. Its cash assistance benefits are among the highest in the nation. Although the state has an above-average per capita income, a very high proportion of its population lives in poverty.

Massachusetts--one of the most affluent states, with one of the highest per capita incomes--has one of the lowest poverty rates. It has a low teenage birthrate and offers above-average cash assistance benefits. Virginia offers low cash assistance benefits and provides cash assistance to a small proportion of its population; the state's per capita income is slightly higher than that of the nation as a whole, and its poverty rate is low.

DATA SOURCES

This study relies on both qualitative and quantitative data. MPR and DHHS staff members conducted site visits to each of the four study states. In addition, each state provided data covering school attendance sanctions and other information for a sample of teenage parents.

Site Visits

Site visits to each state consisted of approximately one day of interviews with state-level welfare officials and an additional day or two in at least one local welfare agency. At the state level, we spoke with staff members knowledgeable about the development, implementation, and evolution of the state's policies toward teenage parents. At the local level, we spoke with

agency directors, supervisors, and eligibility and intake workers about their specific procedures for (1) identifying teenage parents, (2) monitoring and enforcing their compliance with attendance and living arrangement requirements, and (3) providing teenage parents with support services.

In some instances, we conducted additional interviews with people who work closely with teenage parents receiving cash assistance but who function outside the welfare department. For example, in Arizona and Massachusetts, we spoke with the directors of GED programs serving large numbers of teenage parents about, among other topics: (1) barriers to school attendance facing teenage parents, (2) the involvement of their programs with attendance-monitoring procedures, and (3) their interaction with the welfare department. In Massachusetts, we spoke with a director of a teenage parent group home about the day-to-day operation of this type of facility and the advantages of this living arrangement for teenage parents and their children. In California, we spoke with Cal Learn case management staff about their program's policies and operations.

TABLE 1
SELECTED CHARACTERISTICS OF THE FOUR STUDY STATES

| | Arizona | California | Massachusetts | Virginia | United States |
|---|----------------|-------------------|----------------------|-----------------|----------------------|
| 1995 Population (in Millions) | 4.2 | 31.6 | 6.1 | 6.6 | 262.8 |
| 1995 Per Capita Income (in Dollars) | 18,987 | 22,035 | 25,099 | 21,940 | 21,188 |
| Percentage of the Population Below the Poverty Level in 1994 | 15.9 | 17.9 | 9.7 | 10.7 | 14.5 |
| Percentage of the Population Receiving AFDC or SSI in June 1994 | 6.5 | 11.7 | 7.5 | 4.8 | 7.7 |
| Maximum AFDC Grant for Family of Three in January 1996 (in Dollars) | 347 | 607 | 565 | 354 | 389 ^a |
| Births per 1,000 Unmarried Women in 1990: | | | | | |
| Ages 15 to 17 | 41.2 | 34.4 | 22.2 | 26.2 | 29.6 |
| Ages 18 to 19 | 81.5 | 71.4 | 38.2 | 53.2 | 60.7 |

Source: Birthrates from "Births to Unmarried Mothers: United States, 1980-92." U.S. Department of Health and Human Services, Public Health Service, Centers for Disease Control, National Center for Health Statistics, June 1995. All other figures from "Statistical Abstract of the United States, 1996." U.S. Department of Commerce, Economics and Statistics Administration, Bureau of the Census, 1996.

^a Maximum AFDC grant for the median state.

AFDC = Aid to Families with Dependent Children.

SSI = Supplemental Security Income.

Quantitative Data

In each of the four study states, we collected and analyzed quantitative data to supplement the qualitative interview data.⁽⁵⁾ Each state provided us with longitudinal data for a sample of teenage parents who received cash assistance in the early months of 1996. The longitudinal data cover sanction data (and, in California, bonus data) associated with the school attendance requirement for a 12- to 15-month period.

Each state provided additional, descriptive, statewide data covering such items as the number of teenage parents receiving cash assistance and changes in this number over time, as well as the number of teenage parents participating in certain programs and receiving particular services. Virginia also provided statewide information on the number of case closings and application denials for violation of the living arrangement requirement during the first 18 months of the policy.

III. IDENTIFICATION OF TEENAGE PARENTS

Implementing policies and programs that target teenage parents requires, first of all, the ability to identify them. The new federal TANF regulations require states to deny cash assistance to unmarried minor custodial parents who do not live in an adult-supervised setting and who do not attend school regularly if they do not have a diploma or its equivalent. Therefore, compliance with TANF may require some state welfare agencies, which previously had no operational need to identify minor parents, to develop the capability to identify this population. Accurate and efficient identification and referral of teenage parents receiving cash assistance is essential because it enables welfare agencies to enforce the relevant requirements specific to teenage parents.

Moreover, states may want to target supportive services to this high-risk population. Many teenage parents face substantial obstacles to future success: unsupportive home environments, social isolation, long-standing poor school performance, lack of role models

from whom they can learn parenting and other life skills, and struggles over child care. If state welfare agencies want to provide meaningful assistance to help teenage parents meet the new requirements, they must be able to identify teenage parents and refer them to the necessary support services.

Identifying all eligible teenage parents can be a major challenge.

Welfare policies that apply specifically to teenage parents pose a special challenge, because many young parents do not head their own cash assistance case. These policies require that welfare agencies collect information on the parent status of all case members, not just the case head. Procedures and computer data systems often are not designed to collect and maintain detailed information about case members other than the case head. Therefore, successful implementation of policies focusing on teenage parents frequently requires modifications of procedures and supporting information systems.

Teenage parents on someone else's case can be particularly difficult to identify.

Research on programs for teenage parents has consistently found that identifying young parents who receive cash assistance on someone else's case is difficult (Hershey 1991; Bloom et al. 1991; and Bloom et al. 1993). For example, the evaluations of the Learning, Earning, and Parenting (LEAP) program in Ohio and the Teenage Parent Demonstration in Illinois and New Jersey found that welfare agencies in these states had considerable difficulty identifying teenage parents who did not head their own cash assistance case. In contrast, it was relatively easy for all three programs to identify teenage parents who headed their own cash assistance cases.⁽⁶⁾ The states in our study reported similar difficulties identifying teenage parents receiving cash assistance on someone else's case.

IDENTIFICATION AND COMPUTER DATA SYSTEMS

A computer data system that tracks the parental status of all case members, not just the case head, greatly enhances a welfare agency's ability to identify teenage parents receiving cash assistance. For example, Arizona's automated data system for tracking cash assistance cases links teenage parents to their children on the grant, even if the teenager does not head the case. This capability makes it possible for the state welfare agency to identify, in an automated fashion, all teenage parents receiving cash assistance.

Identifying information may be inaccurate or incomplete.

Even if a state's data system is able to identify teenage parents, however, this information may be inaccurate or incomplete. Identifying information is particularly likely to be incomplete if local welfare agencies have no operational reason to identify this population. Virginia's computer data system illustrates this point. The state's central computer system for tracking

cash assistance cases has for many years contained a field for flagging teenage parents. However, an analysis conducted by the state welfare agency as part of this study revealed that only about one in four teenage parents receiving cash assistance on someone else's case was actually flagged in the state's computer system. Because Virginia has no policies or programs that require identifying teenage parents, it appears that local welfare staff do not use the teenage parent field consistently.

Agencies may need to modify data systems to facilitate identification.

If a welfare agency's data system does not track the necessary information for identifying teenage parents, the agency may choose to modify its system. For example, when Massachusetts first implemented a school attendance requirement for teenage parents, the state welfare agency added to the data system a field for flagging teenage parents. The state welfare agency instructed eligibility workers to use the flag each time they encountered a teenage parent on one of their cases. However, even when states modify their data systems in this way, staff in local welfare offices may not use the new fields consistently. For example, welfare officials in Massachusetts reported that local staff often did not use the new fields for flagging teenage parent cases.

IDENTIFICATION AND LOCAL WELFARE STAFF

Identification of eligible teenage parents depends not only on data systems, but also on local welfare staff. Upon application for cash assistance, intake workers must ask about the relationships among all case members. In addition, when an eligibility worker adds a new baby to an existing case, that worker must determine whether the mother of the child is a teenager on the case who is now subject to one of the new teenage parent provisions. If the data system has the capability, the eligibility worker must enter the necessary relation and education information.

Staff must not only identify teenage parents, they must also refer the parents to the proper programs and services.

Properly identifying teenage parents is essential, because it provides the basis for referring those eligible to the appropriate programs and services. Even if the state's computer system identifies all (or almost all) teenage parents, eligibility workers may not always refer them properly. For example, in November 1995, Arizona began requiring 13- to 15-year-old custodial parents who were on cash assistance to participate in the state's JOBS program if they had dropped out of school.⁽⁷⁾ The state's data system identifies teenage parents and links them to their children on the grant, even when the teenager is not the head of the case. Moreover, eligibility workers are trained to ask about relationships among all members of the case. In spite of these computer capabilities and procedures, statewide data provided by the state's welfare agency reveal that, during the first several months under the new policy, most

parents under 16 who had dropped out of school had not been referred to JOBS. In early 1997, state welfare staff reported that eligibility workers continued to have difficulty remembering to refer these cases to JOBS.

The small number of eligible teenage parents may make it difficult to remember to refer them.

One important reason why local welfare staff may not refer eligible teenage parents to the proper program may be that eligible teenage parents represent such a small fraction of the caseload. For example, in Arizona, only 0.2 percent of cash assistance cases contain a teenage parent under age 16 (the group that may require a special referral to JOBS under the state's waiver). It may be difficult for eligibility workers to remember special rules and procedures that affect so few cases and that they so rarely need to use.

STRATEGIES FOR IMPROVING IDENTIFICATION

The experiences of the study states suggest some useful strategies for improving the process for identifying and referring eligible teenage parents. These strategies are summarized next.

Data systems that require welfare staff to record the mother of all minors on the case greatly facilitate identification.

A data system that includes as a required field a "pointer" that identifies the mother of each minor on a cash assistance case greatly improves the ease with which welfare agencies can identify teenage parents. This type of system links all minor parents on the case to their children, which allows welfare agencies to identify young parents in an automated fashion. Moreover, requiring local welfare staff to record the mother of a minor in order to move on to the next field in the data system will ensure that staff record this information completely. If, instead, the system uses a teenage parent flag that is not a required field, it will be unclear whether a blank field indicates that the minor is not a parent or that welfare staff simply forgot to flag the teenage parent in the system.

Training and regularly reminding staff about new procedures is crucial for complete identification.

Welfare agencies implementing new teenage parent provisions need to train local welfare staff to follow the new procedures for identification and referral. Agencies also should send regular reminders to local staff to use the new procedures during the first months under the policy. In addition, state welfare agencies may need to conduct periodic audits to determine the frequency with which local staff are referring eligible teenage parents and using the new data fields, as well as the level of accuracy of the recorded information.

Positive incentives to refer teenage parents may facilitate the referral process.

Establishing positive incentives for eligibility workers to identify and refer teenage parents may facilitate the referral process. For example, procedures for handling teenage parent cases in Massachusetts enable regular eligibility workers to reduce their workload by referring teenage parents to the appropriate services.

Teenage parent cases are handled by specialized eligibility workers known as "teen specialists" who, in most cases, work exclusively with cash assistance cases containing a teenage parent. Local staff in Massachusetts reported that regular eligibility workers (those not assigned to teenage parents) work diligently to find and refer teenage parents, because these potentially complicated cases are moved from their caseloads to those of the teen specialists. Staff believe that the desire of regular eligibility workers to make their workloads more manageable will soon cause almost all teenage parents to be identified and properly handled by local offices.

Referrals from other agencies can improve identification.

Given the potential challenges to identifying and referring all those subject to the new teenage parent provisions, it may be a useful strategy for welfare agencies to rely on referrals from other agencies that serve teenage parents. For example, Cal Learn staff considered referrals from schools and health care providers to be an extremely useful and important method of improving their coverage of eligible teenage parents and the speed with which they are brought into the program. Program staff from both California counties visited for the study reported that they were actively working to strengthen ties with schools and health care providers. These closer ties will allow Cal Learn staff to rely on these agencies for referrals of eligible teenage parents, so that the program can more quickly begin serving teenagers when they first become eligible for Cal Learn.

Local welfare staff in Massachusetts reported that the Division of Medical Assistance (which administers the state's Medicaid program) notifies the local welfare office of all births to families receiving cash assistance, so that the new baby is added to Medicaid. Staff described this process as very useful for identifying teenagers on existing cases who become parents.

TANF AND THE IDENTIFICATION OF MINOR PARENTS

The new federal TANF regulations may require some states to develop the capacity to identify minor parents. A state that imposed the most narrow mandatory attendance policy allowed under TANF, one that applied only to unmarried minor custodial parents, would need the capability to identify minor parents (including those on someone else's case) from among its cash assistance caseload.

Attendance policies covering all school-age minors allow TANF compliance without identifying minor parents.

A substantial number of states, however, have chosen attendance policies for young cash assistance recipients that are consistent with this TANF requirement and that do not require identification of minor parents on someone else's case. For example, Virginia's state welfare reform initiative, implemented in 1995, meets the TANF requirement by mandating that all school-age minors (not just minor parents) attend school. Those who do not attend regularly can have their needs removed from the cash grant. By requiring all school-age minors (including those who are parents) to attend school regularly as a condition for cash assistance receipt, the state can deny cash assistance to minor parents who do not attend school (as required under TANF) without being able to distinguish minor parents from other school-age minors on their caseload.

The new federal TANF regulations also require that states deny cash assistance to minor parents who do not live with an adult guardian unless certain limited exceptions apply. However, states do not need to identify minor parents on someone else's case to enforce this requirement, since, presumably, these minors are already living with an adult guardian (the case head). Therefore, states such as Virginia, which impose attendance requirements covering all school-age minors, will not need to be able to identify minor parents on someone else's case to comply with TANF.

However, a state that cannot identify teenage parents cannot target services to this population.

Teenage parents are very likely to become long-term welfare recipients. For this reason, welfare agencies may want to target limited resources for special programs and services to this high-risk population. If the agency does not have the capability to identify teenage parents, however, it will be unable to target this population for special services.

1. Title I, Section 101, of PL 104-193 describes the reasons that Congress enacted sweeping changes to the welfare system.
2. See PL 104-193, Section 103, Part A, Section 408 a (4).
3. See PL 104-193, Section 103, Part A, Section 408 a (5).
4. For a more detailed discussion of the selection of states for the study, see Burghardt and Wood (1996).
5. Analyses of these quantitative data are presented primarily in Volume II.

6. The identification of teenage parents who head their own cases is typically done by simply searching the data system for case heads who are under age 20.
7. Both before and after this policy change in Arizona, 16- to 19-year-old dropouts on cash assistance were required to participate in JOBS, regardless of their parent status.

Implementing Welfare Reform Requirements for Teenage Parents: Lessons from Experience in Four States

III. IDENTIFICATION OF TEENAGE PARENTS

Implementing policies and programs that target teenage parents requires, first of all, the ability to identify them. The new federal TANF regulations require states to deny cash assistance to unmarried minor custodial parents who do not live in an adult-supervised setting and who do not attend school regularly if they do not have a diploma or its equivalent. Therefore, compliance with TANF may require some state welfare agencies, which previously had no operational need to identify minor parents, to develop the capability to identify this population. Accurate and efficient identification and referral of teenage parents receiving cash assistance is essential because it enables welfare agencies to enforce the relevant requirements specific to teenage parents.

Moreover, states may want to target supportive services to this high-risk population. Many teenage parents face substantial obstacles to future success: unsupportive home environments, social isolation, long-standing poor school performance, lack of role models from whom they can learn parenting and other life skills, and struggles over child care. If state welfare agencies want to provide meaningful assistance to help teenage parents meet the new requirements, they must be able to identify teenage parents and refer them to the necessary support services.

Identifying all eligible teenage parents can be a major challenge.

Welfare policies that apply specifically to teenage parents pose a special challenge, because many young parents do not head their own cash assistance case. These policies require that welfare agencies collect information on the parent status of all case members, not just the case head. Procedures and computer data systems often are not designed to collect and maintain detailed information about case members other than the case head. Therefore, successful implementation of policies focusing on teenage parents frequently requires modifications of procedures and supporting information systems.

Teenage parents on someone else's case can be particularly difficult to identify.

Research on programs for teenage parents has consistently found that identifying young parents who receive cash assistance on someone else's case is difficult (Hershey 1991; Bloom et al. 1991; and Bloom et al. 1993). For example, the evaluations of the Learning, Earning, and Parenting (LEAP) program in Ohio and the Teenage Parent Demonstration in Illinois and New Jersey found that welfare agencies in these states had considerable difficulty identifying

teenage parents who did not head their own cash assistance case. In contrast, it was relatively easy for all three programs to identify teenage parents who headed their own cash assistance cases.⁽¹⁾ The states in our study reported similar difficulties identifying teenage parents receiving cash assistance on someone else's case.

IDENTIFICATION AND COMPUTER DATA SYSTEMS

A computer data system that tracks the parental status of all case members, not just the case head, greatly enhances a welfare agency's ability to identify teenage parents receiving cash assistance. For example, Arizona's automated data system for tracking cash assistance cases links teenage parents to their children on the grant, even if the teenager does not head the case. This capability makes it possible for the state welfare agency to identify, in an automated fashion, all teenage parents receiving cash assistance.

Identifying information may be inaccurate or incomplete.

Even if a state's data system is able to identify teenage parents, however, this information may be inaccurate or incomplete. Identifying information is particularly likely to be incomplete if local welfare agencies have no operational reason to identify this population. Virginia's computer data system illustrates this point. The state's central computer system for tracking cash assistance cases has for many years contained a field for flagging teenage parents. However, an analysis conducted by the state welfare agency as part of this study revealed that only about one in four teenage parents receiving cash assistance on someone else's case was actually flagged in the state's computer system. Because Virginia has no policies or programs that require identifying teenage parents, it appears that local welfare staff do not use the teenage parent field consistently.

Agencies may need to modify data systems to facilitate identification.

If a welfare agency's data system does not track the necessary information for identifying teenage parents, the agency may choose to modify its system. For example, when Massachusetts first implemented a school attendance requirement for teenage parents, the state welfare agency added to the data system a field for flagging teenage parents. The state welfare agency instructed eligibility workers to use the flag each time they encountered a teenage parent on one of their cases. However, even when states modify their data systems in this way, staff in local welfare offices may not use the new fields consistently. For example, welfare officials in Massachusetts reported that local staff often did not use the new fields for flagging teenage parent cases.

IDENTIFICATION AND LOCAL WELFARE STAFF

Identification of eligible teenage parents depends not only on data systems, but also on local

welfare staff. Upon application for cash assistance, intake workers must ask about the relationships among all case members. In addition, when an eligibility worker adds a new baby to an existing case, that worker must determine whether the mother of the child is a teenager on the case who is now subject to one of the new teenage parent provisions. If the data system has the capability, the eligibility worker must enter the necessary relation and education information.

Staff must not only identify teenage parents, they must also refer the parents to the proper programs and services.

Properly identifying teenage parents is essential, because it provides the basis for referring those eligible to the appropriate programs and services. Even if the state's computer system identifies all (or almost all) teenage parents, eligibility workers may not always refer them properly. For example, in November 1995, Arizona began requiring 13- to 15-year-old custodial parents who were on cash assistance to participate in the state's JOBS program if they had dropped out of school.⁽²⁾ The state's data system identifies teenage parents and links them to their children on the grant, even when the teenager is not the head of the case. Moreover, eligibility workers are trained to ask about relationships among all members of the case. In spite of these computer capabilities and procedures, statewide data provided by the state's welfare agency reveal that, during the first several months under the new policy, most parents under 16 who had dropped out of school had not been referred to JOBS. In early 1997, state welfare staff reported that eligibility workers continued to have difficulty remembering to refer these cases to JOBS.

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Implementing Welfare Reform Requirements for Teenage Parents: Lessons from Experience in Four States

IV. SCHOOL ATTENDANCE REQUIREMENTS

The PRWORA of 1996 specifies that block grant funds may not be used to provide assistance to a minor custodial parent unless the minor parent is attending school. In this chapter, we present an overview of the key decisions states face when implementing school attendance requirements, using the experiences of the four study states as a guide. In addition, we present the lessons from our examination of these states' programs.

DECISIONS FOR STATES

The states in the study adopted very different approaches to structuring their policies and programs for requiring teenage parents to attend school. These approaches reflect differences in the policy priorities of the state governments and in the operational histories of their cash assistance programs. The states' policies relating to school attendance differed in several key parameters:

- The groups covered by the requirement
- The specific educational programs teenage parents must attend
- Whether services such as case management were offered to support efforts to complete high school
- The criteria and procedures used to monitor attendance
- The fiscal incentives used to enforce the attendance requirements

Table 2 summarizes the choices of the states in our study along these dimensions.

TABLE 2

SCHOOL ATTENDANCE POLICIES IN FOUR STATES

| | Arizona | California | Massachusetts | Virginia |
|--|----------------------------|---------------------------------|---------------------------------|-----------------------|
| <i>When did policy take effect?</i> | November 1995 | September 1995 | November 1995 | July 1995 |
| <i>Who is covered?</i> | Custodial parents 13 to 19 | Custodial parents 18 or younger | Custodial parents 19 or younger | All school-age minors |

| | | | | |
|---|--|--|---|--|
| <i>Must client work toward diploma or GED?</i> | No, but strongly encouraged | Yes | Yes | Yes |
| <i>Does state welfare agency pay for special GED programs?</i> | Yes, limited | No | Yes, extensive | No |
| <i>Who is responsible for case management?</i> | Primarily JOBS | County welfare agency contracts primarily with Adolescent Family Life Program provider | Eligibility workers | Eligibility workers |
| <i>Do case managers specialize in teenage parents?</i> | No | Yes | Yes | No |
| <i>What is the average caseload size?</i> | 80-100 in most cases 25-35 for a small number of cases in Phoenix | 35-40 | 65-80 | Not available |
| <i>What is the attendance standard?</i> | Attend and make satisfactory progress | Passing grades on four report cards in a 12-month period | Not absent more than 25 percent of school in a month without good cause | Not considered truant by the local school district |
| <i>Who reports attendance to welfare agency?</i> | Client | Client | Client | School |
| <i>How frequently is attendance monitored?</i> | Monthly (or weekly) | Four times per 12 months | Monthly | Monthly |
| <i>Are bonuses used in addition to sanctions?</i> | No | Yes | No | Yes |

| | | | | |
|--|-----|----|-----|----|
| Can sanction cut grant to zero? | Yes | No | Yes | No |
|--|-----|----|-----|----|

What groups will be covered by the school attendance requirement?

When implementing school attendance requirements, states will have to determine who will be covered by the new policy. Three of the four states in the study--Arizona, California, and Massachusetts--focused their school attendance requirements specifically on **custodial teenage parents** who did not possess a high school diploma or equivalent. Among the three, there were differences in the ages covered: Arizona's and Massachusetts's policies applied to custodial parents age 19 and under. California's policy applied to custodial parents age 18 and under. In contrast, Virginia's school attendance requirement applies to **all school-age minors** (not just to those minors who are parents). This latter approach is one that many states have chosen. Our initial review of states' AFDC waivers revealed that more than half the states that sought waivers to implement a school attendance requirement chose to implement it for all school-age minors, as Virginia has done.

What education programs will be acceptable?

States must determine what programs are acceptable for the purpose of satisfying the attendance requirement. The definition of "appropriate school setting" appears self-evident: an education program that leads to a high school diploma. Yet the issue is greatly complicated by the educational, emotional, and other needs of adolescents who have children and who apply for welfare. A large body of experience demonstrates that it is often extremely difficult to get teenage parents to stay in or (since many dropped out well before becoming pregnant) to return to regular high school programs.

All states in the study except Arizona require that teenage parents who do not have a high school diploma or its equivalent attend a high school or GED program. Arizona strongly encourages teenage parents to work toward a diploma, although JOBS staff have the flexibility to assign a teenage parent to a training or education program that does not grant a high school diploma or equivalent, if that is in the best interest of the client.

Will the state fund special education programs for teenage parents?

An important related issue is the extent to which cash assistance programs will directly fund education and training services for welfare clients or will rely on services funded through other sources. This issue is similar to one all states confronted in deciding about the funding of employment training services under the former JOBS program. The issue is especially important for minor parents because states typically require that adolescents attend school--thus some program to serve this group already exists everywhere. Yet public schools may not be equipped to meet the special needs of teenage parents. Thus, as policymakers implement a

requirement that teenage parents receiving cash assistance attend school, they must also decide whether or not the welfare agencies will provide funding for education programs tailored to the needs of parents.

All the states in the study relied primarily on the public education system and existing community resources to provide an educational program for teenage parents. Arizona, however, contracts directly for GED programs for teenage parents on a limited basis, and Massachusetts does so on a larger scale. Nearly 20 percent of teenage parents receiving cash assistance in Massachusetts are enrolled in GED programs that the state welfare agency funds directly.

How will case management be organized?

In organizing case management, states must determine how they will find a suitable school assignment, monitor compliance with the attendance requirement, and arrange and administer child care and transportation assistance. They also must decide how they will provide notice and determine whether good cause exists if the client does not comply, order sanctions, and administer the cash assistance grant. Programs also must provide for the flow of information among staff responsible for each function. In addition, states may provide more intensive, proactive case management in which a case manager has frequent contact with the teenage parent to provide personal support, assist with problem solving, and serve as an advocate.

The states adopted diverse approaches to case management. Arizona's waivers extended to custodial parents age 13 to 15 the requirement to participate as mandatory JOBS participants if they did not attend school. In line with this policy approach, the work of monitoring, providing support services, and administering financial incentives is conducted for teenage parents in the same way these functions are conducted in Arizona's JOBS program. Eligibility workers identify teenage parents, monitor school attendance of those who attend school, and refer to JOBS as mandatory participants those teenage parents who do not attend school. A JOBS case manager ensures that each mandatory JOBS participant enrolls in a suitable program, monitors attendance and progress, and requests sanctions when appropriate. The eligibility worker administers cash assistance, including sanctions.

California's Cal Learn program is administered through California's GAIN program (the state JOBS program). Case management services and monitoring are conducted by specialized staff who work only with teenage parents. Case management services include needs assessment; identifying appropriate health care, housing, and education services; and monitoring service delivery. Case management must be provided according to standards established for the Adolescent Family Life Program (AFLP) of California's Department of Health. In many counties, the welfare agency contracts with the local AFLP agency to conduct Cal Learn case management. Cal Learn case managers work closely with GAIN staff and income eligibility staff who are responsible for administering the program's fiscal incentives and support

services.

In contrast to approaches in which responsibility for different functions is shared among different staff, Massachusetts has made income eligibility staff responsible for monitoring attendance and arranging support services, as well as for administering the grant. For cases that include a teenage parent, one eligibility worker (a teen specialist) is responsible for administering cash assistance, monitoring school attendance, arranging support services, and implementing sanctions. Massachusetts further concentrated this responsibility among a limited number of staff by having teen specialists handle all cases that include a teenage parent.

In Virginia, as in Massachusetts, eligibility workers are responsible for monitoring school attendance, assisting with child care, and administering the grant. In contrast to Massachusetts, however, cases with teenage parents are not assigned to specialized eligibility workers.

Caseloads per case manager differed across the study states, depending on whether case managers were expected to provide extensive personal support. In line with its goal of providing intensive case management, Cal Learn case managers may have caseloads of no more than 40. Thus, California has adopted a statewide policy of providing intensive case management with associated personal support. In Arizona, Young Families Can (YFC) in Phoenix provides case management for 150 to 180 teenage mothers under contract with the Arizona state welfare agency. YFC provides case management services similar in their intensity to those of Cal Learn, with caseloads of 25 to 35 teen parents per case manager. In contrast to the intensive model, case managers in the Arizona JOBS program handle 80 to 100 cases, including adults and teenage parents. Finally, teen specialists in Massachusetts have 65 to 80 cases per worker, approximately a third smaller than the caseloads other eligibility workers serve, in recognition of the additional work associated with monitoring school attendance.

What role will child care assistance play?

Imposing a school attendance requirement for teenage parents may increase their need for child care assistance. Child care is a major program support service offered to teenage parents in all four study states. For example, among teenage parents receiving cash assistance in Arizona in early 1996, one-fourth received child care assistance at some point during that year. State and local staff in each study state reported that both funding and slots for serving teenage parents' child care needs were adequate.

What methods will be used to monitor attendance?

States that impose school attendance requirements will have to establish procedures for monitoring attendance on a regular basis. Monitoring procedures differed across the study

states in terms of the frequency of reports, who is responsible for furnishing the information, and what information is reported (days attended or grades received).

In Arizona, for teenage parents who were enrolled in school at their last case review, attendance is monitored only every six months as part of case redetermination. Teenage parents who are found to be dropouts at redetermination become JOBS mandatory. JOBS-mandatory teenage parents have their attendance monitored monthly (or, in some cases, weekly) through standard monitoring procedures for all JOBS participants.

In contrast, Massachusetts monitors the attendance of all teenage parents without a diploma or its equivalent (including those who were enrolled at their last review) on a monthly basis. The welfare agency requires teenage parents to have an attendance form completed each month by their high school or GED program. It is up to the teenage parent to take the form to the school or program and, usually, to see that it is returned to the welfare office.

Virginia monitors the school attendance of all school-age children who receive cash assistance on a monthly basis. Each month, the state welfare agency provides each of Virginia's 134 school districts with the list of children in their district subject to the attendance requirement. Districts then match the list of names to their enrollment and attendance records and report to the local welfare office the children who are either not enrolled or enrolled but considered truant.

California policymakers who designed the state's Cal Learn program chose a different strategy to promote the educational attainment of teenage parents. The state monitors the school progress and school grades of teenage parents rather than their attendance. To verify satisfactory progress and grades, Cal Learn participants must submit report cards to case managers four times in a 12-month period.

What financial incentives will be used?

Finally, states will have to determine the types of financial incentives they will use to enforce the attendance requirement. The sanctioning systems in Arizona, California, and Massachusetts focus on the behavior of the teenage parent. In Massachusetts, if a teenage parent fails to meet the attendance requirements and does not establish good cause, her needs--and, if the situation persists, those of her child--are removed from the grant. Thus, if noncompliance persists, the cases of teenage parents who head their own case are closed. In Arizona, the grant is reduced by 25 percent in the first month and 50 percent in the second month. In the third month of noncompliance, the case is closed.

In California, a sanction is assessed for failing to demonstrate adequate progress--either by not submitting a report card or by submitting one that does not show at least a D average--on four report cards per 12-month period. The sanction is \$100 per unsatisfactory report card,

with each sanction assessed over two months at \$50 per month. A bonus of \$100 is awarded up to four times in a 12-month period for a report card demonstrating satisfactory progress ("C" or better). California also awards a \$500 bonus for attainment of a high school diploma or GED certificate.

Virginia monitors the school attendance of all school-age children included in a cash assistance case. When a school district reports as truant a child receiving cash assistance, state policy requires that the eligibility worker meet with the case head to develop a plan for addressing the child's attendance problem. If the parent or guardian fails to meet with the caseworker or to comply with the plan developed by the caseworker, the case is subject to a sanction, which entails removing the needs of the truant child from the grant.

The sanctioning policy used in Virginia differs in an important respect from the policies used in the other states in the study. In Arizona, California, and Massachusetts, an attendance sanction is deemed appropriate or not on the basis of the teenage parent's behavior. In Virginia, the sanction policy focuses on the behavior of the parent responsible for the minor. A sanction is imposed when the parent fails to take steps to correct the truant behavior of the child. Virginia's focus on the parent's behavior follows logically from the state's decision to include all school-age children (including those as young as age 6) in its attendance requirement, since younger children are subject to greater parental control.

IMPLEMENTATION LESSONS

The four study states had all been operating under their school attendance policies for more than a year at the time of our site visits. Their experiences illustrate several important lessons for other states that are implementing school attendance requirements.

A range of education options, including GED programs, are important for meeting the educational needs of teenage parents.

Implementing a meaningful school attendance requirement for teenage parents requires a broad range of alternatives to regular public education programs leading to a high school diploma. GED programs are an important part of the mix. Staff responsible for working with teenage parents to administer school attendance requirements in Arizona, California, and Massachusetts emphasized that teenage parents face obstacles to remaining enrolled and attending school every day. Responsibilities of child-rearing, lack of support from families and friend for their efforts to stay in school, and their own immaturity all can make it difficult for teenage parents to stay in school. Moreover, many teenage parents had fallen behind grade level or dropped out of school before they became parents. Thus, staff who worked with teenage parents perceived that returning to a regular high school program was not a suitable placement for many teenage parents receiving welfare.

Research evidence supports the view that GED programs and other alternative education options should play a prominent role in efforts to helping teenage parents complete a high school diploma or equivalent. In Ohio's demonstration of LEAP, researchers found that a school attendance requirement for teenage parents receiving cash assistance was effective in increasing regular school and GED program attendance, but that it did not increase rates of graduation with a regular high school diploma (Long et al. 1996). LEAP improved rates of GED attainment among students who were still in school when the demonstration started, although it produced no similar improvement for teenage parents who had already dropped out of school. Thus, GED programs played a role in LEAP, enabling some teenage parents who would not have achieved any high school credential to achieve at least a GED.

A study of demonstration programs designed to improve the high school completion of at-risk students reached similar conclusions (Dynarski et al. 1997). The demonstration included some programs that offered a GED and some that provided alternative high school programs, in which students work toward a high school diploma in modified, more intensive programs. The study found that many at-risk students and school dropouts entered GED programs from alternative high schools. Furthermore, GED programs increased attainment of a high school equivalency. In contrast, alternative high school programs did not improve high school completion. The researchers hypothesized that the GED programs were more successful because they were self-paced, had clear objectives, and could be completed relatively quickly.

Earning a GED may not be a good substitute for completing a high school diploma. Evidence indicates that completion of a GED (without further education beyond it) contributes less to future earnings capacity than does completion of a high school diploma (Cameron and Heckman 1993). Even so, for young people who do not complete high school, a GED is better than no high school credential at all (Murnane et al. 1995).

Directly funding GED programs for teenage parents helps ensure that suitable school placements are available.

State welfare agencies in two study states (Massachusetts and Arizona) directly fund GED programs for teenage parents. Through its Young Parents Program (YPP), Massachusetts's Department of Transitional Assistance (DTA) directly funds GED programs throughout the state that serve young parents (age 14 to 21) who receive cash assistance. In early 1997, approximately 20 percent of Massachusetts's teenage parents receiving cash assistance were enrolled in a YPP-sponsored GED program. Arizona funds GED programs on a more limited scale, primarily in Phoenix.

In contrast, the California Department of Social Services does not pay for such programs. Cal Learn clients may enroll in adult education programs leading to a GED, but Cal Learn's financial incentive system discourages this option. Because GED programs do not provide interim reports on progress, a Cal Learn client enrolled in a GED program cannot qualify for an

interim bonus unless the program is willing to establish a system for measuring interim progress. Cal Learn staff perceived that this feature discouraged Cal Learn clients' use of GED programs. Clients can avoid a sanction by attending a GED program regularly, and they qualify for the \$500 completion bonus if they achieve a GED certificate.

Staff we spoke with in California had different perceptions than staff in Massachusetts and Arizona about the availability of adequate educational opportunities for teenage parents. Cal Learn staff reported difficulty finding enough good placements for their clients; they felt that many teenage parents chose "independent study" through their high schools, in part because too few spaces in educational programs tailored to the needs of young parents were available. Staff in Massachusetts and Arizona generally reported that education opportunities were adequate to ensure that teenage parents can find a suitable program. It is likely that the difference in staff perceptions in Arizona and Massachusetts, compared with California, is due, at least in part, to differences in the availability of GED programs and the differing incentives to use these programs.

GED programs designed specifically for teenage parents can incorporate program elements that address their special needs.

Not only can GED programs for teenage parents provide education, they can also directly address some of the barriers that interfere with school attendance and completion. For example, the Maricopa Center for Adolescent Parents, in Phoenix, Arizona, incorporates life skills and parenting education in its GED program for teenage parents, in addition to offering on-site child care. Staff work with mothers to help them become more comfortable about leaving their babies in the care of other adults. Resources are available for identifying developmental problems of the babies and intervening with professional assistance. Maricopa Center staff emphasized the importance of establishing a safe atmosphere in which the teenage parents can meet clear expectations and draw support from staff and peers.

Massachusetts' Young Parent Programs provides both educational activities and life skills training, as well as counseling and case management. Educational activities include GED preparation classes, remedial adult basic education classes, and job readiness and job skills classes. Life skills classes cover such topics as the health and nutrition of the young mother and her child, child development, good parenting skills, and family planning.

Choosing the focus of case management involves trade-offs among different program goals and costs.

Implementing a school attendance requirement requires a system for gathering information about the attendance of individual teenage parents and, if attendance is unsatisfactory, acting on this information. In addition, programs can provide varying levels of support in helping teenage parents overcome the barriers they face to persevering in school, such as child care,

counseling, proactive assistance in problem solving and meeting the needs of the young mother and her child.

In the three study states that identified teenage parents and offered special services for them, we observed three distinct approaches:

1. Using the JOBS program case management approach for teenage parents (in Arizona)
2. Placing responsibility for case management and income maintenance functions with specialized eligibility workers responsible for all aspects of the teenage parent's case (in Massachusetts)
3. Instituting an intensive case management system that provides personal support and assistance in securing a broad array of health care, housing, and other services in addition to those most directly associated with welfare agency concerns (in California and parts of Arizona)

The key difference among these approaches lies in the intensity of case management. At 65 to 80 cases per case manager, case management for teenage parents in Massachusetts is less intensive than in California but more intensive than has been observed in other programs serving teenage parents. For example, case managers in the Teenage Parent Demonstration generally had caseloads nearly twice the Massachusetts level. The case management provided in Cal Learn and through Arizona's contract with the city of Phoenix is even more intensive than that offered in Massachusetts, with only 25 to 40 cases per case manager. These different approaches to case management involve important trade-offs among (1) the level of personal support that can be provided, (2) the types of staff backgrounds required to provide case management, (3) administrative complexity, and (4) costs.

Intensive case management can provide a high level of support, but it can be expensive and requires a different mix of staff skills.

Following the standards for case management of teenage parents established by the California Department of Health, Cal Learn case managers give priority to a broad assessment of needs for health care, housing, and other services, including education. Case managers also place priority on finding the services necessary to address these needs, on monitoring receipt of these services, and on building a long-term relationship with the teenage parent.

This type of case management requires background and skills that differ from those of eligibility workers and, to some extent, from those of JOBS case managers. It also requires small caseloads per case manager. The agencies providing Cal Learn case management in the two California counties we visited were health care providers--in one case, a private organization and, in another, the county health department. Individual case managers came from diverse backgrounds in health, mental health, social work, and related human service fields. In both agencies, case managers were supervised by master's-level social workers. The

YFC program in Phoenix, Arizona, uses an approach to case management similar to Cal Learn's, although it is not operated by an organization providing health care.

The mix of staff skills needed for intensive case management can be obtained by contracting with a separate agency. In Cal Learn, contracting for case management on a broad scale brought with it the necessity to build collaboration between organizations with differing philosophies around missions. More important, it introduced the need to establish methods of communicating information among staff who performed key functions. County welfare agency eligibility workers issued grants and paid for support services, while county welfare agency GAIN staff retained formal responsibility for making recommendations on sanctions and bonuses. Cal Learn case managers worked directly with teenage parents. Substantial staff effort was necessary to develop smoothly functioning procedures initially and make the communications system work on an ongoing basis. Each of the two counties we visited relied heavily on a complex, paper-based system to achieve the necessary communication of information about individual clients. Coordination and information flow were simpler in the YFC program in Phoenix, due to the program's much smaller size and to the automated data system in place to support case management. The small caseloads, specialized staff skills, and need to communicate across organizations are important costs to take into account when considering intensive case management.

Agencies conducting case management through AFDC and JOBS systems can build directly on existing staffing and data management systems.

The Massachusetts and Arizona programs illustrate two approaches to incorporating teenage parent school attendance requirements into existing procedures. Because Arizona's program to require school attendance by teenage parents operated through its JOBS program, the existing case management system required almost no modification. The primary change was that eligibility workers referred teenage parents between 13 and 15 who were not attending school to the JOBS program as mandatory participants. (Teenage parents 16 and older had been subject to these requirements for several years under JOBS and AFDC rules.)

Massachusetts chose to concentrate all case management functions, including administration of the cash grant, with teen specialists who work exclusively with cases involving a teenage parent. Placing all functions with one worker eliminated the need to make sure information moved from one staff member to another. Specialization also enabled managers to place responsibility for working with teenage parents on staff who welcomed the challenge. It also enabled each eligibility worker to develop a strong working knowledge of the special rules pertaining to teenage parents, as well as knowledge of supportive services available to assist them.

Adopting the approach used in Massachusetts requires flexibility among staff in taking on new responsibilities, care in delineating teen specialists' responsibilities, and training to allow staff

to handle new responsibilities. For example, at the time of our visit in early 1997, teen specialists were taking on the responsibility of making annual home visits to monitor teenage parents. Even with lower caseloads than their colleagues who performed income maintenance tasks for other cases, some Massachusetts teen specialists still expressed frustration that they had to limit their involvement in problem solving and the supportive aspects of case management. It is important that policymakers and program managers choose the level and type of case management they want to provide, to ensure that staff have the training and time needed to perform their functions effectively.

Programs must address teenage parents' reluctance to use child care.

Staff reported that child care funding and slots were adequate to meet the expressed need among teenage parents and that the availability of child care was seldom a barrier to attending school. However, teenage parents are often reluctant to use child care. Staff in all states and local offices visited for the study reported that many teenage parents do not like to use formal child care arrangements and prefer to rely on relatives for care. As one case manager put it, many teenage parents believe that good mothers do not leave their babies with strangers. Staff also said that most teenage parents are not well-informed consumers of child care; thus, they are insecure about judging the quality of care and asserting their rights as consumers. Several staff in each state mentioned recent stories in the media that drew attention to abuses in child care centers and informal child care homes, noting that this media attention increased the reluctance of teenage parents to use formal child care.

Even when assistance is readily available, child care issues can affect attendance and young parents' schooling decisions.

Staff raised several concerns about the way child care issues affect implementation of a school attendance requirement. A GED program administrator in Massachusetts noted that, since sanctioning for poor attendance leads to the loss of child care assistance for the month in which the sanction is assessed, a teenage parent can lose her spot at a desirable day care facility. The loss of child care, in turn, impedes her return to school and, thus, her ability to have the sanction lifted.

Several staff noted that children of teenage parents tend to have more health problems than other infants, leading to frequent school absences for some teenage parents who must stay home with sick children. Others reported that teenage parents tend to prefer family day care over day care centers and that family day care tends to be less reliable and stable than center care. Care provided in informal child care homes may be temporarily unavailable (if the provider is sick or has a personal emergency), or permanently unavailable (if the provider decides to pursue another occupation).

Teenage parents' attitudes about child care, coupled with the reluctance of some schools to

have parents attend regular school programs, may cause some teenage parents to select schooling options that are not in their best interest. For example, Cal Learn staff said that, while many public schools do not like to enroll teenage parents in their regular school programs, these schools do not have suitable alternative programs to meet the needs of all teenage parents. The schools then encourage teenage parents to pursue independent study. Furthermore, many teenage parents favor independent study because it requires no child care and avoids conflicts with family members or boyfriends who think young mothers should not be attending school. Case managers view the selection of independent study as harmful because it reinforces the young mother's isolation and discourages her efforts to find support systems outside her home that will help sustain her efforts to complete school.

Monitoring attendance increases welfare agency staff workload, sometimes substantially.

Monitoring school attendance can require substantial time from case managers serving teenage parents. Staff in Arizona did not consider workload associated with attendance monitoring a major issue, because teenage parents who were enrolled in school at their last case redetermination (a substantial fraction of teenage parents) are monitored only every six months through the normal redetermination process. Teenage parents who are dropouts at redetermination are monitored through the normal JOBS process for other JOBS-mandatory participants.

In California, the staffing requirements for Cal Learn case management were recognized explicitly: caseloads of Cal Learn case managers may not exceed 40 clients, to ensure that Cal Learn agencies can provide the full range of services outlined in the AFLP case management standards. Monitoring school progress is just one of many tasks (albeit a time-consuming one) Cal Learn case managers are asked to perform.

Moreover, integrating into the workloads of case managers the notification requirements associated with monitoring report cards and communications with the welfare agency to change grants posed challenges for the Cal Learn program. Case managers in both California counties visited for the study initially found the paperwork requirements of the welfare system formidable. To alleviate the case managers' clerical burden, managers in both counties have, to varying degrees, moved responsibility for tracking cases, sending forms to clients, and entering data into computer systems away from case managers and into a separate administrative support unit.

In Massachusetts, state welfare staff have explicitly recognized the additional work inherent in implementing the school attendance requirement. They have created specialized eligibility workers (teen specialists) with smaller caseloads who work exclusively with teenage parent cases. Teen specialists have caseloads of 65 to 80, compared with 110 cases for other eligibility workers. State-level staff indicated that teen specialists' caseloads were reduced in

recognition of the additional work associated with enforcing the attendance requirement. This suggests that monitoring school attendance and all the attendant activities is viewed as increasing the work per case by roughly 50 percent.

In Virginia, the school attendance monitoring was designed so that state welfare staff would provide each school district with a list of school-age children receiving cash assistance, and the school district would provide the local welfare agency with a list of students who were truant. Developing workable procedures at the local level has been a continuing challenge, and the process continues to require substantial local staff time. In principle, Virginia's schools report to the county welfare agency those students who are truant. In practice, it is difficult for schools to distinguish between students who are briefly absent and those who have serious attendance problems. In one large district, welfare agency staff found that many students reported as truant by the school district were briefly absent for illness. Thus, following up on cases listed as truant by the school district has required significant staff time for the local welfare agency.

Monitoring attendance through the AFDC and JOBS structure can lead to delays in discovering that a young parent has dropped out.

Although conducting case management for teenage parents through the AFDC and JOBS program structure (as is done in Arizona) offers many advantages, it appears to have some drawbacks as well. The school attendance of a teenage parent enrolled in school is monitored every six months at case redetermination. If a teenage parent drops out of school, the eligibility worker most likely would not learn about the change until the next periodic case redetermination, perhaps as much as six months later. Upon learning of the change, the eligibility worker would refer the teenage parent to JOBS as a mandatory participant. In this monitoring system, many months could elapse between the point at which the teenage parent leaves school and the time when a JOBS case manager begins to work with the teenage parent. Monthly monitoring of all teenage parents without a diploma, including those enrolled at their last review (as in Massachusetts), eliminates this potential delay. Even with monthly reporting, however, some Massachusetts staff reported that they were concerned that too much time could pass before they learned of an attendance problem.

Monitoring attendance can complicate the relationship between welfare agencies and schools.

Most local welfare agencies and school districts have not worked together previously. Establishing working relationships posed substantial challenges in Virginia's Learnfare program. As in many states, local school districts in Virginia operate with a great deal of autonomy. State welfare officials reported that some school districts initially objected to monitoring compliance with Learnfare. In implementing attendance monitoring at the local level, the welfare agency had to address resistance stemming from schools' belief that

monitoring was not germane to their basic mission, burdens on school staff, technical difficulties stemming from lack of computer experience, and concerns about privacy.

Making teenage parents responsible for reporting reduces the burden on schools.

Both Massachusetts and Virginia instituted regular monthly attendance reporting as part of implementing their school attendance requirements. In Massachusetts, staff reported that the process worked smoothly. In Virginia, staff reported difficulties making the process work. We suspect that the smoother operation in Massachusetts may have resulted from (1) limiting the reporting requirement to a smaller segment of the cash assistance caseload (that is, only teenage parents and not all school-age minors), and (2) placing the responsibility for securing the attendance report on the student. Both factors significantly reduced the burden placed directly on schools. California's approach to implementing school progress monitoring eliminated the reporting burden on schools completely by relying on report cards and making it the teenage parent's responsibility to provide these to the Cal Learn case manager.

A significant fraction of teenage parents received sanctions.

We examined the sanctioning experiences of a sample of teenage parents in each study state over a one-year period. We found that, over the course of a year, about 20 percent of cases with a teenage parent statewide in Arizona were sanctioned at least once, and 22 percent of teenage parents in two offices in Massachusetts were sanctioned. Sanctioning rates were lower in Virginia (about 11 percent, statewide) and higher in California (about 48 percent, in the two study counties).

While it appears that sanctions were imposed on substantial percentages of teenage parents, we cannot readily assess the extent to which sanctions had the intended effect of persuading clients to attend school. Staff in Virginia and California generally felt the financial incentives were small and had little effect on clients. In contrast, staff in Arizona and Massachusetts, where sanctions could result in termination of the grant, generally felt that the sanctions carried more weight with clients. Data from Massachusetts suggest that sanctions may have had the desired effect. Of the cases that closed due to a sanction for poor attendance, roughly half reopened within a few months, suggesting that loss of the grant may have led some teenage parents to return to school.

Implementing Welfare Reform Requirements for Teenage Parents: Lessons from Experience in Four States

V. MINOR PARENT LIVING ARRANGEMENT REQUIREMENT

The PRWORA of 1996 specifies that states must deny cash assistance to unmarried minor custodial parents who do not live in an adult-supervised setting, unless certain exceptions apply. At the time of our site visits in early 1997, three of the four study states---Arizona, Massachusetts, and Virginia---had implemented similar policies under waivers to the AFDC program and had been operating under these policies for more than a year.⁽¹⁾ Using the experience of these three states as a guide, we outline some of the decisions facing other states as they develop living arrangement policies for minor parents receiving cash assistance. In addition, based on the experiences of these three states, we highlight lessons for other states to consider when developing and implementing their own living arrangement policies.

DECISIONS FOR STATES

States implementing a requirement governing the living arrangements of minor parents must make decisions on several issues of policy and program design. For example, they must determine what living arrangements are acceptable and how they will substantiate a minor's claim that her parents' home is unsafe. States must also determine how they will verify compliance with the requirement on a regular basis. Here, we outline some of the key decisions facing states, using the choices of our study states as a guide. Table 3 summarizes the living arrangement policies in these three states.

What living arrangements will be allowed for minor parents receiving cash assistance?

When states first implement a living arrangement requirement, they will have to determine the set of living arrangements they consider acceptable for minor parents receiving cash assistance. The study states vary on the set of acceptable living arrangements for minor parents. Arizona and Massachusetts allow minor parents to live with a parent, an adult relative, or a legal guardian.⁽²⁾ However, they do not allow minor parents to live with unrelated adults who have not been declared their legal guardians. In contrast, Virginia allows minor parents to live with any adult, provided the local welfare agency considers the adult able to function as an appropriate guardian for the minor and her child.

[TABLE 3](#)

MINOR PARENT LIVING ARRANGEMENT POLICIES IN THREE STATES

| | Arizona | Massachusetts | Virginia |
|---|--|---|--|
| <i>When did policy take effect?</i> | November 1995 | November 1995 | July 1995 |
| <i>What are the acceptable living arrangements for minor parents?</i> | With an adult relative With a legal guardian | With an adult relative With a legal guardian In a state-sponsored group home for teenage parents | With a responsible adult |
| <i>Does the state welfare agency fund teenage parent group homes?</i> | No | Yes | No |
| <i>Under what circumstances can minor parent live independently?</i> | No parent or legal guardian available OR Child protective services substantiates the minor's claim the home is unsafe OR Minor has lived independently for at least 12 months prior to applying for assistance | 17 years old and regularly attending school AND Child welfare authorities assigns client low priority for placement in a state-sponsored group home | No parent or legal guardian available OR Local welfare agency concludes that the minor parent or her child's well-being would be jeopardized by living with the parent or guardian |
| <i>What is the process for investigating allegations that the parental home is unsafe?</i> | Referral to child protective services | Referral to child protective services | Local welfare agency determines process |

| | | | |
|---|--|------------------------------|--|
| <i>What is the process for monitoring living arrangements?</i> | Notes from landlords Other "third party" verification | Forms completed by landlords | Consulting school records Consulting housing authority records Landlord verification |
|---|--|------------------------------|--|

Will the state welfare agency fund teenage parent group homes?

Some advocates and policymakers have argued that, if federal or state governments impose a requirement that minor parents receiving cash assistance must live in an adult-supervised setting, they should provide funding for teenage parent group homes. These homes would serve as an alternative for minor parents unable to live with their parents because the parent is dead, in prison, or cannot be located. The group homes could also serve as an alternative adult-supervised living arrangement when the minor parent makes a substantiated claim of abuse or neglect on the part of her parent. The PRWORA does not provide funding for states to establish teenage parent group homes. The legislation does, however, direct state welfare agencies to assist minor parents who have no adult relative or guardian with whom they can live in locating a group home or other appropriate adult-supervised living arrangement.

Of the states in our study, only Massachusetts has funded group homes for teenage parents in conjunction with imposing a living arrangement requirement. As part of its welfare reform initiative, the state has committed \$5 million annually to fund group homes for teenage parents who receive cash assistance and cannot live with an adult relative. This funding supports 22 group homes statewide that can serve more than 100 teenage parents and their children. The average annual cost of the program's housing and other services is about \$45,000 per participating teenage parent.

Under what circumstances will a minor parent be able to live independently?

When establishing a living arrangement policy, states also will have to determine under what circumstances, if any, they will allow minor parents to live independently. The study states all allow minor parents to live independently under certain limited circumstances; however, the particular circumstances vary across the states. For example, Arizona allows minor parents to continue to live independently if they have been living independently for at least 12 months before applying for cash assistance; Massachusetts and Virginia do not.

Massachusetts has a particularly narrow set of circumstances under which a minor parent receiving cash assistance can live independently. The minor parent must (1) be 17 years old,

(2) attend school regularly or already possess a high school diploma or GED, and (3) be ruled by child welfare authorities to be capable of living independently. In contrast, Arizona and Virginia allow minor parents to live independently when no parent or guardian is living or can be located or when there is a substantiated claim of abuse or neglect on the part of the minor's parent. Under these circumstances, Massachusetts requires minor parents to live in a state-sponsored group home.

What will the process be for determining whether the parental home is unsafe?

States also must decide how the welfare agency will determine whether the minor custodial parent or her child is at risk of physical or emotional harm if they reside in the home of the parent or legal guardian. In particular, when a minor parent alleges that she is at risk in her parent's home, the cash assistance agency must determine whether the allegation is true. Arizona and Massachusetts have imposed specific guidelines at the state level, giving child protective services the responsibility for making this determination. In Virginia, local welfare agencies are responsible for making this determination. However, these local agencies may involve the child protective services if these agencies deem it appropriate to do so.

How will living arrangements be monitored?

When a state imposes a living arrangement requirement for minor parents, it must develop procedures for verifying compliance with the policy. In the states in our study, local welfare staff verify compliance with the living arrangement requirement when an unmarried minor parent applies for cash assistance as the head of a case and again at regular case reviews. Local welfare agencies also require verification of living arrangements whenever a minor parent who heads her own case reports a change of address. Local agencies monitor only the living arrangements of minor parents who head their own cash assistance cases, because those who are not case heads are presumed to be living with an adult guardian (the case head).

The specific methods of verifying living arrangements differ somewhat across the states studied. In Massachusetts, an unmarried minor parent who heads her own cash assistance case must have her landlord and the primary tenant on the lease complete a form verifying where and with whom the minor lives. She must also provide proof of relationship to the primary tenant, typically with a birth certificate. In addition, teen specialists conduct mandatory annual home visits for all teenage parents receiving cash assistance (including those on someone else's case). State welfare officials report that these visits are intended primarily to monitor the general quality of the teenage parent's home environment. However, the visits also will serve as a means of monitoring compliance with the living arrangement requirement.

In Virginia, when a minor parent applies for cash assistance, intake workers first consult local

school district records to try to verify a minor parent's address and the name of her guardian. Local staff in one large agency visited for the study are able to access this information from the welfare office through a direct link to the district's computer system. For minor parents living in public housing, intake workers are also able to verify living arrangements by using the local welfare agency's computer data link to local housing authority records.

IMPLEMENTATION LESSONS

Arizona, Massachusetts, and Virginia had all been operating under their minor parent living arrangement policies for more than a year at the time of our site visits. Based on discussions with state and local welfare staff in these states, several broad implementation lessons emerged.

A very restrictive living arrangement requirement may create implementation difficulties.

If a state imposes a very restrictive living arrangement requirement, it may encounter local agency opposition and other difficulties. For example, when the Virginia Department of Social Services (VDSS) wrote the original regulations for the state's living arrangement policy, the agency imposed a requirement that minor parents live with a parent if at all possible. Under the original rules, a minor parent living with her grandmother was required to move back in with her mother or father, unless there were strong reasons to suspect that the minor parent would be at risk of physical or emotional abuse. If a minor parent refused to move back in with her parents, her cash assistance case was closed, even if she was living with another adult relative.

According to state-level VDSS staff, local agencies found this policy difficult to enforce. Moreover, they considered it bad policy to force minor parents out of stable living situations with an adult relative to return them to their parent's home. Because of these local concerns, VDSS changed the policy a year after implementing the living arrangement requirement. Under current VDSS policy, a minor parent must live either with her parent or with an adult considered by the local welfare agency to be an appropriate guardian. Since the change in policy, application denials for violation of the policy have dropped from five or six per month statewide under the old policy to one or two per month under the new policy.

Funding group homes may enable states to have fewer exemptions to the requirement.

Having space readily available in teenage parent group homes may make it easier for states to allow only a narrow set of living arrangements for minor parents. For example, Massachusetts allows minor parents to live independently only in very limited circumstances. In early 1997, no unmarried minor parents receiving cash assistance in Massachusetts lived independently. In

spite of the state's strict living arrangement policy, Massachusetts has a low rate of case closings for violation of the living arrangement requirement relative to other study states.

Massachusetts' Teen Living Program, which funds group homes for teenage parents throughout the state, allows welfare staff to tell young mothers they can provide a safe alternative if their parental home is not safe. Without this option, program staff might be forced to pursue one of three alternative approaches: (1) allow more minor parents to live independently; (2) accept a broader interpretation of what constitutes an acceptable adult-supervised arrangement; or (3) accept that some minor parents who do not meet the state's requirements will be denied cash assistance. It appears that the Teen Living Program enables Massachusetts to adopt a strict definition of acceptable living arrangements and to allow few exceptions to the policy, without resorting to frequent case closings and application denials.

Group homes offer a safe, structured, and supportive environment.

Group homes, such as those sponsored by the Teen Living Program in Massachusetts, offer substantial advantages for some teenage parents. In Teen Living Program group homes, a program staff member is on-site 24 hours a day, seven days a week, to provide supervision and security, as well as counseling for problems and crises. Residents must attend an education or job training activity for a minimum of 20 hours each week. They must also participate in several hours each week of parenting and life skills training, help with household chores, and abide by curfews and other requirements. Constructive involvement with program staff and peers may help some teenage parents feel much less isolated and alone. Teenage parents who are emotionally immature or who suffer from depression, low self-esteem, or other emotional problems may particularly benefit from the program's structure and support services. For those who come from chaotic and dangerous living situations, group homes provide a safe, stable alternative.

Even when space is readily available, only a small fraction of teenage parents are likely to reside in group homes.

Despite these advantages, only a small fraction of teenage parents may reside in group homes. Since it began operation, the Teen Living Program has continually had the capacity to serve additional teenage parents and their children. Throughout the first half of 1997, the vacancy rate for the group homes throughout Massachusetts remained over 20 percent. Therefore, the program appears to be more than meeting the demand for group homes among teenage parents receiving cash assistance in the state. Even so, less than two percent of teenage parents receiving cash assistance in Massachusetts reside in group homes, including four percent of minor parents and one percent of 18- and 19-year-old parents. The director of one local welfare office serving a large number of teenage parents suggested that these small numbers were evidence that many teenage parents found the program's curfews and its restrictions on visitors and other activities unappealing.

Although costs per resident are high, overall costs of teenage parent group homes may be relatively modest.

The average annual cost of the Teen Living Program's housing and other services is about \$45,000 per resident. This relatively high cost is due primarily to the program's high staff-to-client ratio. For example, one group home visited for the study had seven full-time staff members (a program director, four counselors, and two overnight staff) serving eight teenage parents and their families. In spite of high costs per resident, because a very small percentage of teenage parents end up residing in group homes, the overall costs of providing group homes are relatively modest. If Massachusetts's experience is typical, a state can expect to spend only about \$800 per teenage parent cash assistance recipient annually to meet the demand among this population for similarly structured group homes. However, if participation rates are higher in other states, their overall costs of providing group homes may also be higher.

Assessing the safety of the parental home will most likely require involvement of child protective services.

When establishing a living arrangement requirement for minor parents, state welfare agencies may need to work with child protective services (CPS) to develop policies and procedures. For example, states may want to consult with CPS officials when determining the specific living arrangements considered acceptable for minor parents receiving cash assistance. Moreover, because local welfare staff may lack the necessary training to assess the safety and appropriateness of a minor parent's living situation, welfare agencies may need to work with CPS to develop procedures for investigating claims by minor parents that their parent's home is unsafe for them or their babies.

The study states varied in how they involved CPS in administering the living arrangement policy. In Arizona and Massachusetts, state policy requires caseworkers to refer all claims by a minor that her parent's home is unsafe to CPS. In Virginia, however, it is up to individual caseworkers to determine whether compliance with the living arrangement requirement threatens the physical or emotional well-being of the minor parent and whether an unrelated adult with whom the minor is living can serve as an appropriate guardian. According to Virginia welfare officials, during the planning phase for the living arrangement requirement, some welfare caseworkers expressed concerns that they did not have adequate training to make determinations concerning the appropriateness of a minor parent's living arrangement. The state agency addressed this concern by allowing local welfare offices to involve CPS social workers in the process if the local offices considered this appropriate.

Monitoring the living arrangements of minor parents is a small burden on staff time because it involves so few cases.

Local welfare staff interviewed for the study consistently reported that monitoring the living arrangements of minor parents was a small burden because so few cases required monitoring. Only one or two percent of cash assistance cases contain a minor parent, most of whom do not head their own cases. Since welfare agencies assume that minor parents on someone else's case are in compliance with the living arrangement requirement (and therefore do not monitor them), welfare agencies monitor only the very small fraction of cases that are headed by a minor parent (0.2 to 0.6 percent of cases in the states we examined).

1. The fourth study state, California, was developing a minor parent living arrangement policy at the time of our visit and planned to implement the policy in mid-1997.
2. A legal guardian is someone who has been granted custody and has been declared responsible for the child by a judge.

Implementing Welfare Reform Requirements for Teenage Parents: Lessons from Experience in Four States

VI. CONCLUSION

Several broad conclusions emerge from our examination of four states' experiences implementing school attendance and living arrangement requirements for teenage parents receiving cash assistance.

First, identifying teenage parents, especially those who are part of someone else's case, is difficult. Several useful strategies are available to states to improve the identification process, including persistent staff training and reliance on referrals from outside agencies that work with teenage parents.

Second, great diversity exists in the way attendance policies are formulated and services delivered. States varied along such dimensions as: specific groups covered by the policies, types of education programs available and methods of funding those programs, definitions of the attendance standard, and methods of monitoring. Financial penalties for poor attendance range from small reductions in grants to eliminating them altogether. Approaches to providing services to support the efforts of teenage parents to persevere in school and raise healthy children are especially diverse. The ones we observed included intensive case management, enriched and targeted GED programs, and supportive, supervised living arrangements.

Finally, living arrangement requirements are broadly similar across states. States differed primarily in their emphasis on providing adult-supervised group living arrangements and the resources they devoted to these arrangements.

We conclude the report with a reminder to the reader. This study has focused on the **operations** of programs that impose school attendance and living arrangement requirements for teenage parents. It was not designed to examine the underlying question of what effects these requirements have on the outcomes of the teenage parents or their children. For example, our study was not designed to assess how many more teenage parents will acquire a high school credential because a school attendance requirement is in effect.

California's evaluation of its Cal Learn program is examining these questions as they pertain to Cal Learn. In fact, the evaluation has been designed in a way that will allow the researchers to estimate separately the effects of intensive case management and the effects of Cal Learn's financial incentives. Accordingly, that evaluation will make an important contribution to our knowledge of the effectiveness of these two key program elements. Evidence developed prior to TANF from demonstration programs such as LEAP, New Chance, and the Teenage Parent

Demonstration shows that improving the outcomes of teenage parents is a challenge.

Implementing Welfare Reform Requirements for Teenage Parents: Lessons from Experience in Four States

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Implementing Welfare Reform Requirements for Teenage Parents: Lessons from Experience in Four States

APPENDIX A: CASE STUDY OF ARIZONA

Arizona implemented statewide welfare reform in November 1995, through its EMPOWER program (Employing and Having People Off Welfare and Encouraging Responsibility). The provisions of EMPOWER relating to teenage parents deal primarily with teenage parents under age 16. Minor custodial parents and pregnant girls between the ages of 13 and 15 must attend school full-time or participate in the Job Opportunities and Basic Skills (JOBS) program, requirements already in effect for older teens. In addition, Empower requires that minor parents live with their parents to receive cash assistance.

A. OVERVIEW OF POLICIES AFFECTING TEENAGE PARENTS

1. School Attendance Policies

Arizona's school attendance requirement for teenage parents was implemented and enforced through the state's JOBS program. Under JOBS program rules at the time, Arizona received its AFDC waivers, all parents between 16 and 19 were required to attend school or be mandatory JOBS participants unless they had a high school diploma or its equivalent. This requirement applies even if the teenage parent has a child under one year of age. Arizona's waivers extended requirements in effect for teenage parents 16 and over to those parents between 13 and 15.

These policies apply to assistance recipients differently, depending on their age. All custodial parents who are 18 or 19 years of age (and pregnant women in their third trimester) and lack a high school diploma or equivalent are mandatory JOBS participants, except that an 18-year-old full-time student who can reasonably expect to graduate before turning 19 may be exempt. All 16- and 17-year-olds, whether custodial parents or not, must be referred to JOBS unless they are attending school full-time or qualify for some other exemption. Finally, as noted, a waiver granted by the U.S. Department of Health and Human Services (DHHS) in November 1995 extended this requirement to welfare recipients between the ages of 13 and 15 who are either custodial parents or in the third trimester of pregnancy.

Although teenage parents attending school full-time are not required to participate in JOBS, they are encouraged to do so voluntarily. As voluntary JOBS participants, they qualify for child care, training-related expenses, and other support services.

2. Minor Parent Living Arrangement Requirements

Arizona's minor parent living arrangement requirement applies to custodial parents under the age of 18 who have never been married. To receive cash assistance, these unwed minor parents must live with their parent(s), an adult nonparent specified relative, or a legal guardian, unless they can establish good cause for living on their own. When the unwed minor parent cannot establish good cause, her assistance unit (mother and child) cannot receive cash assistance, although they may receive medical assistance and support services, including child care and JOBS services.

B. ORGANIZATION OF SERVICE PROVISION FOR TEENAGE PARENTS

The Arizona Department of Economic Security (DES) provides services to teenage parents receiving cash assistance under Arizona's JOBS program and according to JOBS policies. Serving people under age 20 has been a priority of the JOBS program since its inception in 1990. Arizona DES and the City of Phoenix Department of Community Affairs received a DHHS grant to establish Young Families Can (YFC), which, for more than 10 years, has provided case management services to teenage parents receiving cash assistance in Phoenix. In addition, since 1993, DES has entered into agreements with local school districts and community agencies, which provide a broad range of services to help teenage parents receive health care and remain in school. The AFDC waivers granted by DHHS in spring 1995 and implemented in November 1995 did not greatly alter Arizona's system for serving teenage parents; rather, they extended the system's reach to include parents between 13 and 15, seeking to ensure that their needs for health care, schooling, counseling, and support services are met.

Eligibility workers in the Arizona DES Family Assistance Administration (FAA) identify teenage parents at intake or at periodic case reviews. The FAA worker determines whether each teenage parent is attending school or has a diploma. The FAA worker refers to the JOBS program all teenage parents who are not attending school and do not have a high school diploma. The FAA worker also determines the monthly grant amount, including any sanctions levied for failure to comply with JOBS requirements.

The referral from FAA to the JOBS program for JOBS services is accomplished through the Arizona DES automated data system. The name of each person being referred to JOBS is transmitted to JOBS staff in a "referral file," with an indicator showing the person's status for JOBS services. Those on the referral file are called for an appointment with a JOBS case manager, usually within one week. If a backlog exists for JOBS services, custodial parents age 19 or younger, with no high school diploma or GED, are in the JOBS target groups that receive the highest priority.

JOBS case managers help mandatory participants identify a suitable school or training option and then enroll. The case manager also determines the need for child care and transportation

assistance and helps arrange for these, as well as having DES pay for the services, if necessary. The case manager also monitors participation and, if participation is not satisfactory, requests a sanction and generates notices of adverse actions. As described in Section D, the organization of case management and the available school/training options vary considerably across the state.

C. IDENTIFYING TEENAGE PARENTS AND REFERRING THEM FOR SERVICES

FAA workers appear to identify most teenage parents, but they do not consistently refer the youngest teenage parents to the JOBS program. To ensure that teenage parents who do not have a diploma attend school, it is important to identify and focus attention on them.

Arizona state DES staff believe FAA intake and eligibility workers correctly identify most pregnant and parenting teens. FAA workers are trained to ask about the relationships among all the people in an AFDC household. The DES automated data system allows workers to record information by which teenage mothers and their babies are linked, even if the mother is not the head of the assistance unit.

DES state staff believe that the number of younger teenage parents receiving public assistance may be low compared to Arizona's high rate of child-bearing for this age group. They noted that many Arizona communities and families, especially Hispanic ones, prefer to care for the children of their children without public assistance. Thus, while Arizona has one of the highest rates of teenage pregnancy in the country, state staff believe many of these teenage parents do not apply for cash assistance and many are ineligible due to the income of their parents or adult relatives with whom they reside.

We have no firm basis for assessing how well Arizona teenage parents are identified. However, the proportion of cases that include a teenage parent is similar in Arizona to the proportion in other states included in this study. In February 1996, Arizona's cash assistance caseload included 3,660 custodial parents age 19 or younger, which is nearly six percent of the 63,000 cases receiving AFDC at that time. The number and share of total caseload are shown in Table A.1. Minor parents (age 17 and younger) were approximately one percent of cases, and parents age 18 and younger were just over three percent of the caseload.

TABLE A.1

TEENAGE CUSTODIAL PARENTS IN ARIZONA, FEBRUARY 1996

| | Number | Percentage of Caseload |
|--------------|---------------|-------------------------------|
| Less than 16 | 147 | 0.2 |
| 16 | 263 | 0.4 |

| | | |
|--------------|--------------|------------|
| 17 | 356 | 0.6 |
| 18 | 1,282 | 2.0 |
| 19 | 1,612 | 2.6 |
| Total | 3,660 | 5.8 |

Source: Tabulations on data of all teenage parents receiving assistance in Arizona during February 1996.

In assessing the completeness with which Arizona eligibility workers identify teenage parents, it is important to bear in mind that being a parent does not affect the school attendance requirements of recipients between ages 16 and 18: all people age 16 to 19 are required either to attend school or be mandatory JOBS participants. Younger teenage parents, however, are subject to more stringent school attendance requirements than their nonparenting peers.

Referring younger teenage parents for JOBS services if they drop out of school has been a problem. State DES staff reported that FAA eligibility workers continue to have difficulty remembering to refer younger parents who have dropped out of school and thus should be referred to JOBS as mandatory participants under the waiver rules. Data on the JOBS status of teenage parents receiving assistance in February 1996 support these concerns. Exemptions from jobs in Arizona is granted only for persons under 16, and the waiver rules eliminated this exemption reason for parents age 13 to 15. Assuming that all 112 exemptions for age were granted to 13- to 15-year-olds, it appears that the exemption was incorrectly applied for nearly three-fourths of the approximately 150 custodial parents under 16. (Some of these persons may have been in school; others have dropped out and should have been mandatory JOBS participants.)

The small number of teenage parents under age 16 suggests an explanation for the problem: workers encounter so few young teenage parents that they do not remember to apply the revised rules for them. Indeed, less than 1 in 10 of Arizona's 1,400 FAA workers will have encountered even one case.

Despite this problem, most cases are being handled correctly, according to the data on JOBS referral status. Nearly half of teenage parents statewide are mandatory JOBS participants (40 percent) or full-time students (4 percent). Approximately one-fourth were exempt from JOBS because they were remote (5 percent), needed at home as a caretaker (less than 1 percent), employed (11 percent), in their third month of pregnancy or later (5 percent), or unable to obtain child care (3 percent). Another one-fourth were exempt as the caretaker of a child under one year, an exemption available to teenage parents who have a high school diploma or equivalent.

D. IMPLEMENTING THE SCHOOL ATTENDANCE REQUIREMENTS

Teenage parents have access to the same JOBS services as regular JOBS participants. Arizona JOBS policy states that pregnant and parenting teens may be served in separate programs tailored to their needs. The nature of the services varies in different communities. In Phoenix, DES contracts with the City, whose staff provide intensive case management for teenage parents. While applying the appropriate JOBS rules, case managers provide close monitoring and extensive support to help the teenage parent overcome the many obstacles to staying in or returning to school. In the remainder of the state, however, JOBS case managers themselves oversee the activities of teenage parents, along with those of the adult participants in their caseloads. In some JOBS offices, notably those in Tucson, a few specialized case managers work exclusively with teenage parents. By ensuring that eligible teenage parents are enrolled in JOBS, DES staff make sure that JOBS support services, especially child care, are available to help teenage parents stay in school and graduate.

1. Case Management and Education Programs

For the most part, JOBS case managers guide teenage parents to enroll in existing programs funded through schools. In addition, where appropriate programs exist, DES contracts with local community agencies to provide comprehensive services for teenage parents receiving public assistance. In some instances, DES contracts for GED or basic education services for teens who cannot return to school and for ancillary services such as counseling, prenatal care, and life skills. In other instances, DES collaborates with existing school-based programs for teenage parents.

Programs for teenage parents in Phoenix illustrate the diverse ways in which Arizona DES serves teenage parents receiving cash assistance in an urban setting. In February 1996, the Phoenix DES district served approximately 2,040, or nearly 56 percent, of the state's 3,660 custodial teenage parents receiving cash assistance. JOBS program case managers oversee the activities of most teenage parents in Phoenix. DES also contracts with the city of Phoenix Human Services Department to provide case management for 150 to 180 teenage parents per month.

YFC case managers provide counseling to teenage parents and assistance in finding services to support their efforts to stay in school. They also ensure that JOBS program guidelines are followed. Assessment activities upon entry to the program include a self-survey for indications of literacy problems or learning disabilities. If the teenage parent appears to have a learning problem, a complete educational assessment can be requested through JOBS. A teenage parent who is learning disabled can be exempted from the school attendance/JOBS requirements.

Arizona DES contracts with Young Families Can (YFC), an agency of the Phoenix Human

Services Department, to provide case management services for teenage parents in Phoenix. Begun 10 years ago as a demonstration project with funding from the DHHS, the program currently is a partnership between DES (which provides just over 20 percent of its annual budget of \$360,000) and the City of Phoenix (which provides about half the program's annual budget). The balance of funding comes from a variety of sources, including the Social Services Block Grant program.

Under its contract, YFC provides intensive, specialized case management services for a small but significant fraction of teenage parents in Phoenix. It is funded for 150 to 180 slots in fiscal year 1997, or just under 10 percent of all Phoenix district teenage parents. YFC was serving 150 teenage parents at the time of our visit in February 1997. Located in South Phoenix (where a high proportion of teenage parents reside), YFC primarily serves local clients who receive FAA services at an office across the street. Teenage parents residing in other parts of the city may also come to YFC, but distance and lack of transportation lead most to receive case management services from regular JOBS case managers at their local offices. Each YFC case manager works with 25 to 35 clients. In contrast, regular JOBS case managers who do not specialize in working with teenage parents typically have about 80 clients. Thus, through a contract with YFC, Arizona DES is able to provide more intensive and specialized case management services to a significant number of its teenage parents.

Case managers recommend educational placements that are realistic for the teenage parent. If a client is 19 and has no high school credits, a high school diploma or a GED is not a realistic goal. In this case, the case manager seeks a suitable educational or work activity, but does not insist that the client return to high school. If the teenage parent is 16 and has some high school credits, the case manager will strongly encourage her to return to high school.

Case managers consider a range of school placement options for their clients in Phoenix:

- Regular high school or junior high school
- Metrotech, a city alternative high school designed specifically for students who have encountered problems in regular school. It provides vocational programs and a regular high school diploma. It has a variety of programs for learning-disabled students, including food service training.
- Charter high schools, which are alternative public schools serving multidistrict areas.
- Maricopa County College, which offers GED, English as Second Language, and Adult Basic Education programs
- GED programs for which JOBS contracts with selected providers

In considering JOBS activities for teenage parents, case managers emphasize high school equivalency completion (GED) programs, while discouraging programs designed to provide vocational skills without a high school credential. They urge clients to focus on a GED first, because they feel the high school credential is important and because JOBS may support

vocational training for teenage parents after they complete a GED if deemed appropriate.

JOBS program rules lead to adaptations in GED programs for teenage parents. The JOBS program requires 20 hours a week of education and training activities, but many GED programs offer only 16 hours. In this circumstance, the remaining four hours required are devoted to other approved JOBS activities, such as participation in a support group and attendance at parenting and life skills classes.

The Arizona JOBS program expects that teenage parents may need to participate in GED for a longer period of time than most adults. For teenage parents, JOBS will approve participation in a GED program for periods of six months at a time. In general, they try to keep GED participation to one year for the teenage parents, although longer periods can be approved. After a teenage parent earns a GED certificate, the JOBS program may support post-secondary or vocational skills training for up to one year. The immediate goal is to have the teenage parent become employable in a trade at an entry level.

The Maricopa Center for Adolescent Parents (MCAP) illustrates the operation of a GED program contracting with DES. The center provides comprehensive services--GED instruction, life skills, and parenting education, as well as child care on-site--for infants as young as two weeks and toddlers up to two years. DES contracts for 20 of the center's 25 slots; the remaining 5 slots, funded from other sources, are reserved for teenage parents not receiving cash assistance. At the time of our visit, 14 of the 20 DES-contracted slots were occupied; the 5 slots funded by other sources had long waiting lists. YFC refers most (but not all) of the center's students funded through DES.

MCAP staff strive to establish a safe atmosphere in which teenage parents can meet clear expectations and draw support from staff and peers. In fact, staff reported that the center program becomes the primary source of encouragement for many teenage parents whose family and partners do not support their efforts to further their education. Individualized GED instruction is the core of the program. Life skills and parenting education are important components as well. Life skills class includes long- and short-term goal setting, career planning, workplace behavior (accepting criticism, dealing with conflicts, keeping a checkbook), communication, self-esteem, relationships, and nutrition. Staff reported that setting realistic long- and short-term goals is especially difficult for teenage parents, because most have never done it (or observed adults who did) and because immediate problems of survival push goals into the background. Parenting skills class focuses on child development, including such topics as the importance of play, bonding, reading, and alternative approaches to discipline. Because many of the mothers have never left their children with anyone else and find it difficult to do so, staff work with the young mothers to help them adjust to leaving their babies in the care of other adults.

The infants and toddlers attending the child care center are at-risk children, many of whom

are developmentally delayed in one or more areas and have significant bonding or attachment problems. Child care staff address these needs by developing and carrying out individualized services plans for the children. Staff, therefore, have access to the assistance of professionals who can conduct the necessary assessments and help the teenager's family develop strategies for dealing with these problems.

YFC and MCAP illustrate the types of intensive services available to teenage parents in Arizona cities. However, not all parents are served in such a manner, even those in Phoenix. YFC provides case management services for just 150 to 180 (or 5 to 10 percent) of the teenage parents in the Phoenix district. JOBS caseworkers, who serve 80 clients on average, provide case management services for most teenage parents as part of their adult caseload. In addition to the Maricopa Center for Adolescent Parents, the JOBS program also contracts with three other providers in Phoenix for the same services and with two providers in rural areas.

State staff emphasized that JOBS services for teenage parents in rural areas are far more limited than services in Phoenix, Tucson, and other Arizona cities. This is partially due to the fact that there are no providers in rural areas that specialize in teenage parents. Subject to limited staff resources, Arizona DES seeks to conduct outreach in rural areas by going into schools and letting the teenage mothers know about the support services available to them through JOBS.

2. Child Care

Teenage parents can receive child care assistance through JOBS as voluntary or mandatory JOBS participants if they need assistance in attending school. Data for teenage parents who were receiving cash assistance near the beginning of 1996 show that approximately 27 percent received child care during calendar year 1996. DES pays for child care provided by licensed centers, certified group and family child care providers, and relatives. DES staff reported that centers provide 85 percent of the care for DES clients. Average reimbursement rates are close to the average market rates based on market surveys. Staff reported that clients in some rural areas had difficulty finding a provider, but that, in general, child care posed no obstacle to participation in JOBS. (Only three percent of teenage parents were exempt from JOBS due to lack of child care.) Interestingly, however, despite the evidence that child care generally can be arranged and does not pose a barrier to participation, DES staff reported that in focus groups held with clients (not necessarily teenage parents), child care was cited as an obstacle to JOBS participation, especially in rural areas.

3. Progress Monitoring and Sanctions

Monitoring school attendance and progress is done in a variety of ways. For all people (not just teenage parents) between 16 and 18, who do not participate in JOBS, FAA workers must verify school attendance at application and at each review by asking the school to complete a

written form. However, attendance monitoring for AFDC recipients enrolled in schools is not done on a monthly or weekly basis.

If the teenage parent is a JOBS participant, the case manager monitors school attendance. YFC case managers reported that monitoring entails a face-to-face meeting with each teenager at least once a month. Teenage parents must submit weekly time reports signed by their school instructor to show that they are attending school regularly. YFC encourages the client to bring the report to the office; to meet with those who cannot do this, case managers frequently travel to the school (but rarely to the home). Regular JOBS case managers who work with teenage parents also said that they require attendance reports as often as once a week. They emphasized that it is also important for teenage parents to come in and meet with them, although JOBS case managers usually are not able to leave the office to meet with clients at school. Case managers like to receive weekly reports from clients, so that they will be aware immediately of any problems or drop-off in attendance.

State staff reported that case managers exercise discretion in determining whether the client is making a good-faith effort to fulfill program requirements, and whether a sanction is necessary. Case managers are encouraged to be flexible but to watch for patterns of behavior which indicate that a client is taking advantage of this flexibility. Case managers follow guidelines designed to rule out such factors as "good cause" for missing school (taking a vacation was offered as an example) and that allow others which are clearly valid (illness of the client or child, death in the family). Temporary transportation breakdown is an example of a situation in which the case manager could exercise judgment and would likely not impose a sanction, especially if the client's participation record is otherwise good. Also, the case manager will assist the client in eliminating the barrier.

YFC case managers reported that, although they carry out DES policies on noncompliance, they are more lenient with teenage parents than JOBS case managers are with adult clients. If teenage parents blatantly refuse to go to school, the case manager requests a sanction, though not before working with the client to remedy the problem. The JOBS case managers we spoke with also said they were more lenient with their teenage parents than with their adult clients.

Arizona's sanctioning system has changed with welfare reform. At the time of our visit in February 1997, a sanction entailed removing the needs of the teenage parent from the cash grant. The JOBS case manager sends out a notice of change, which gives the client seven days to call or come in and establish good cause for the infraction. After that period, the case manager requests a sanction and the eligibility worker reduces the grant. The first instance of noncompliance results in a one-month sanction; the second, a three-month sanction. The third infraction brings a six-month sanction. After the sanction is implemented, it must remain in effect for the full period--compliance does not remove the sanction. After the minimum period, the sanction remains in effect if the client does not agree to comply. During the sanction period, the person may not receive JOBS services.

On August 1, 1997, new cash assistance sanctioning procedures became effective. For the first month of noncompliance, the household's grant is reduced by 25 percent; for the second month, it is reduced by 50 percent. For the third month of noncompliance, cash assistance is stopped (the case is closed). Compliance with JOBS ends the sanction, and the grant can be restored to 100 percent without a new application unless the case has been closed.

E. MINOR PARENT LIVING ARRANGEMENT REQUIREMENT

Arizona's requirement that minor parents live with an adult relative or guardian was first implemented in November 1995, under a waiver granted by DHHS. All minor custodial parents who have never been married must live with a parent, legal guardian, or legally responsible adult. If the minor parent refuses without good cause to do so, all cash assistance to the assistance unit is denied. However, the minor custodial parent remains eligible for Medicaid, JOBS assistance, and related support services. Good-cause reasons include the following:

- The minor parent does not have a living, natural or adopted parent or legally responsible adult.
- The whereabouts of the parent or legally responsible adult are unknown.
- The minor parent meets emancipation criteria: has lived apart from parents for the 12 months before application, has been financially independent, and has not received AFDC during the 12 months before application.
- The minor parent claims abuse and neglect, and a Child Protective Services (CPS) investigation has substantiated the claims or has been unable to determine whether the claims are true.

The FAA worker must verify the first three good-cause reasons. If the minor parent claims abuse or neglect, the worker asks whether she can substantiate the claim and refers the case to CPS, forwarding any documentation that the unwed minor parent provides. The case remains eligible for assistance, pending completion of the CPS investigation. If CPS substantiates the claim of abuse, or neglect is substantiated, or CPS is unable to determine whether the claim is accurate, the case remains eligible for AFDC. If CPS finds the claim is not substantiated, AFDC cash assistance is stopped, effective two months after the FAA worker enters the data into the system. If an unwed minor parent supplies additional information to support a claim of abuse or neglect, she must reapply and the CPS investigation must be redone. The case is not eligible for cash but remains eligible for support services until the minor parent turns 18. At that time, the parent may reapply for cash assistance; indeed, she must do so to remain eligible for JOBS assistance and support services.

An unwed minor parent is always part of the assistance unit of the parent or responsible adult if the adult is receiving assistance. If the minor parent lives with a nonparent who is not requesting aid, the minor parent is not eligible unless the adult is also needy.

As noted earlier, Arizona has a relatively small number of unwed minor parents on its cash assistance caseload. Of nearly 3,700 teenage parents receiving cash assistance in February 1996, approximately 700 were unwed parents under the age of 18. Of these, 70 percent were part of an assistance unit headed by an adult, and 30 percent were heads of their own assistance unit. The case heads include minor parents living with an adult who is not receiving assistance, as well as minor parents living on their own for good cause. We do not know how many of the approximately 200 minor parents who head cases are living independently.

Approximately 70 minor parents statewide are receiving only support services because cash assistance was denied for refusal to live at home without good cause. The Arizona DES does not provide alternative living arrangements.

Implementing Welfare Reform Requirements for Teenage Parents: Lessons from Experience in Four States

APPENDIX B CASE STUDY OF CALIFORNIA

This chapter presents a case study of California's Cal Learn program. Cal Learn is a statewide program to encourage and assist teenage parents receiving cash assistance to graduate from high school or its equivalent and become self-sufficient. The case study is based on discussions with Cal Learn staff at the California Department of Social Services and with Cal Learn and county welfare agency staff in Sacramento and Santa Clara counties.

California's living arrangement requirement for teenage parents was being developed at the time of our visit in early 1997 and was implemented in May 1997. In light of California's evolving policies and limited operational experience in this area, the case study of California's teenage parent programs does not include information on the living arrangement requirement.

The Cal Learn program was implemented statewide in 1994 and 1995, under authority of waivers granted by the U.S. Department of Health and Human Services. The case study describes the program's operations as they existed in early 1997. On August 11, 1997, California's legislature and governor enacted Assembly Bill (AB) 1542, which overhauled several existing welfare programs operating at the time under the federal Temporary Assistance for Needy Families (TANF) Program. The legislation creates California Work Opportunity and Responsibility to Kids (CalWORKS), which eliminates the Aid to Families with Dependent Children (AFDC) and the Greater Avenues of Independence (GAIN) programs. Assembly Bill 1542 retains the Cal Learn program. The provisions of CalWORKS will be implemented beginning in 1998.

A. OVERVIEW OF TEENAGE PARENT REQUIREMENTS IN CALIFORNIA

Cal Learn, a statewide initiative of California's governor and legislature, is a mandatory, statewide entitlement program administered through county welfare departments. All pregnant and parenting teens who have not yet reached their 19th birthday are receiving AFDC, and who do not have a high school diploma or its equivalent, are required to participate. The Cal Learn program consists of three components:

1. Bonuses and sanctions to encourage teenage parents to attend and progress in school
2. Support services necessary for teenage parents to attend school--including reimbursement for child care, transportation, and educational expenses

3. Intensive case management to assist the teenage parent in obtaining needed education, health, and social services

Specific Requirements. Teen parents eligible for Cal Learn must participate full-time in a school program that leads to a high school diploma or its equivalent. The state has a wide variety of traditional and alternative high school programs through which teen parents can meet this requirement: regular high school, continuation education, court and community schools, home and hospital instruction, independent study, opportunity schools, adolescent pregnancy and parenting programs, and adult education programs leading to a GED or completion of high school graduation requirements.

Monitoring and Enforcement.

Cal Learn participants must submit report cards to case managers within 10 days of issuance up to four times in a 12-month period. Although the school defines academic progress, regulations specify that satisfactory progress (grade point of 2.0 or "C" or better) results in a \$100 bonus to the assistance unit. A "D" (between 1.9 and 1.0) results in no bonus or sanction. Unsatisfactory progress (grade point below 1.0) results in a \$100 reduction in benefits. A \$500 bonus is awarded the adolescent for graduation or its equivalent. Thus, teenage parents can earn a financial bonus up to \$400 in a 12-month period, plus the \$500 graduation bonus. Sanctions for failure to attend school and make satisfactory progress can be up to \$400 in a 12-month period. School attendance per se is monitored only for the purpose of reimbursing child care costs.

B. ORGANIZATION OF PROGRAMS AND RESPONSIBILITIES

County welfare departments administer Cal Learn. The legislation establishing Cal Learn requires that case management services meet the standards and scope of the Adolescent Family Life Program (AFLP), which is administered by the California Department of Health Services. Cal-Learn case management aims to involve the teenage parent, her partner, and her family, in collaboration with the case manager, in identifying the teen's educational, social, and health needs and in determining how best to meet those needs. The following specific goals have been set for the teenage parent and her child:

- Obtain the appropriate educational services for graduation from high school or its equivalent
- Reduce maternal and child mortality and morbidity
- Enhance the teenage parent's parenting skills
- Promote an effective ongoing relationship among the teenage parent, the noncustodial parent, and the child, where this is in the best interest of the child and the teenage parent
- Help the teenage parent obtain or maintain a physically and mentally healthy living

situation

- Help the teenage parent and her family use health care resources to achieve and maintain good health
- Help the teenage parent reduce unintended future pregnancies

After conducting an initial interview and assessment, the Cal Learn case manager develops an individual service plan for each teenage parent, prescribes services to address the parent's needs, and follows up to ensure that the teenage parent receives the services. The caseload of a Cal Learn case manager must not exceed 40 clients. As the list of goals indicates, progress in school is one goal among many for teenage parents that the program promotes.

The legislation establishing Cal Learn directs county welfare departments to contract with an AFLP provider to provide Cal Learn case management services. County welfare departments can make other arrangements if AFLP is not available, AFLP services are not cost-effective, or the county welfare department has an existing teenage parent services program. However, if the county decides not to contract with an AFLP provider, it must establish protocols for Cal Learn that meet the standards and scope of AFLP. The Department of Health Services reviews and approves the protocols.

In each of the two counties that participated in this study, three agencies played a role in Cal Learn:

1. ***The local AFLP agency provides Cal Learn case management services, under contract with the county welfare department.*** Case managers assess needs, identify services, and monitor client progress. They also assist and encourage clients to fulfill program requirements (such as keeping appointments with the case manager and submitting requested report cards) and provide written confirmation of compliance or noncompliance to the county welfare department. The case manager also identifies and verifies a teenage parent's need for child care, transportation, and ancillary services, and transmits this information to the county welfare department. In both Sacramento County and Santa Clara County, the agency providing Cal Learn case management services also operates AFLP, with separate funding, to serve teenage parents who are not cash assistance recipients.
2. ***The county welfare department identifies welfare clients eligible for Cal Learn, refers them to the program, and issues payments.*** It also notifies the Cal Learn case manager when a client is discontinued from AFDC. The county welfare department retains final responsibility for acting on recommendations of case managers for bonuses, sanctions, and sanction-related good cause and for making final determinations for program exemptions and deferrals. Furthermore, the county welfare department prepares and issues notices of adverse action and calculates and issues payment for support services. Some of these functions are performed by income maintenance workers and some are performed by staff in California's Greater Avenues for Independence (GAIN) program. Because Cal Learn is within GAIN administratively,

the county GAIN program provides oversight to ensure that program rules are administered correctly.

3. ***Public school districts provide education services to most Cal Learn participants.*** Indeed, state law requires that public schools provide an educational program to all people under the age of 18.

The state provides funding for Cal Learn. For case management, counties are reimbursed \$137.50 per case per month that a client is enrolled. They also receive an allotment of \$25.26 per month per enrolled client for AFDC case administrative costs. Counties receive reimbursement for child care, transportation, and ancillary expenses according to the same policies that govern supportive services in the GAIN program. However, to counties for Cal Learn, state supportive service payments are not subject to a maximum amount, as they are under GAIN counties.⁽¹⁾ Similarly, county costs claimed for Cal Learn case management are not capped. No resources are allocated for educational services, since these are to be provided by local school districts. In 1996, state planners expected to serve 23,000 Cal Learn clients and allocated \$92 million for the state's share of the Cal Learn program.

C. IDENTIFICATION OF TEENAGE PARENTS

All pregnant girls and custodial parents who are under 19 years of age, receive AFDC, and do not have a high school diploma or equivalent must participate in Cal Learn. The county welfare department identifies eligible clients and refers them to the Cal Learn program. However, Cal Learn program staff also conduct outreach and case-finding activities. Through these efforts, Cal Learn staff learn about and enroll a substantial number of clients. Nevertheless, identification and referral of all eligible clients remains a significant challenge for the program.

Eligibility workers in the county welfare department have primary responsibility for identifying clients eligible for Cal Learn. When a new case applies, the eligibility worker conducting the intake is responsible for determining whether a teenage parent is in the assistance unit and, if so, for finding out whether the teenager has a high school diploma. If the teenage parent is the head of the assistance unit, identification of the parent is straightforward: the eligibility worker must determine the relationship between the case head and each child for whom assistance is requested and determine whether the teenager has graduated from high school or has a GED. In contrast, if the teenage parent is "embedded" within the case of a senior parent that may contain younger siblings of the teenage parent and the child of the teenage parent, the eligibility worker must identify the relationships among all members of the assistance unit. Eligibility workers who handle ongoing cases are expected to identify births to embedded teenage parents at the annual redetermination of case eligibility. When a teenage parent is identified, the eligibility worker refers the client to the Cal Learn program by entering an appropriate code to the automated case data system. Lists of new Cal Learn referrals are then transmitted to the Cal Learn program on a regular basis.

Several factors pose obstacles to identifying and referring all eligible custodial parents to Cal Learn. First, the family may not promptly report the pregnancy of, or birth to, a teenage parent. A teenage girl on her mother's cash assistance case might not know she is pregnant until the third or fourth month of the pregnancy, and even then she might not tell her mother that she is pregnant. Even if the teenage girl does tell her mother that she is pregnant, the family has no incentive to report the pregnancy to the welfare department until the point at which the grant can be increased.

Second, forms and data systems are not structured to record and store all the necessary information. Although the application form contains a question about pregnancy status, this form is completed at intake and annually thereafter. Therefore, unless the pregnancy occurs during these periods, the application/reinvestigation form would not be used by either the client or the eligibility worker to report or verify the information. Furthermore, the relationship identifiers in the data systems are not adequate to identify embedded cases. When Cal Learn was initially implemented, computer runs identified all cases with a child under age three and at least one teenage female. Eligibility workers then had to check whether the teenage female was the parent of the child under three. The monthly reporting forms ask a general question, "Does anyone have anything else to report?" and the caretaker answers "yes" or "no". Becoming pregnant, having a baby, aborting or miscarrying are examples provided. However, staff reported that often this section of the "Monthly Eligibility Report" is routinely checked "no". Revisions to the forms and data systems that might remedy some of these problems are under consideration, but such changes are expensive and cannot be implemented quickly.

Third, situations may arise when--due to large caseloads, frequent regulation changes, and other demands of the eligibility worker's job--an eligibility worker cannot aggressively pursue information which might indicate that a teen in an embedded case is a custodial parent and whether she has a high school diploma. This occurs infrequently, however. The number of these cases is a small percentage of the total number of cases carried by an eligibility worker.

Cal Learn staff reported that they identify many pregnant or custodial teenage parents who are eligible for Cal Learn but have not been referred to the program. In some cases, these teens are receiving welfare; in other cases, they are eligible for welfare but not receiving it. If the teenage parent is not receiving cash assistance but is eligible to do so, the case manager works with a county eligibility worker to establish her eligibility for cash assistance, then to enroll her in Cal Learn. If the teenage parent is already receiving cash assistance, the case manager contacts her eligibility worker to ask that she be referred to Cal Learn.

The Cal Learn providers engage in outreach and case finding, as called for in the AFLP standards for Cal Learn case management. Two sources of direct referrals to the Cal Learn agency are important. First, Cal Learn providers work with and become known to school staff. In both the local Cal Learn programs we visited for this study, a major responsibility of case managers and their direct supervisors was working with school districts to promote school-based programs for teenage parents. Thus, when school staff learn that a student is pregnant,

they may refer her to Cal Learn for case management and support services. Second, as AFLP agencies, the agencies providing Cal Learn case management are well known to health care providers. Cal Learn staff reported that health providers are especially eager to have their patients enroll in AFLP or Cal Learn because the intervention of the case manager increases the likelihood that the girl will follow through in getting prenatal care for herself and well-baby care for her newborn. Thus, MediCal (California's Medicaid program) and other health care providers refer pregnant and parenting teenagers to Cal Learn.

Cal Learn staff's outreach efforts identify a significant, though small, percentage of Cal Learn clients. While Cal Learn programs do not keep records on the number of Cal Learn clients they identify, one Cal Learn manager estimated that 10 percent of the clients are referred through a source other than the county welfare department. Cal Learn staff believe that the county welfare agency is especially likely to miss identifying younger teenage parents, either because agency workers assume the senior mother, not the teenager, is the parent of the newborn or because the family conceals the truth. Cal Learn staff feel that schools and doctors are key to identifying the younger teenagers. Staff also expressed concern that California's Maximum Family Grant (family cap) law will discourage the reporting of new babies to welfare and thereby make identifying teenage parents through the welfare system even more difficult.

Although many of the staff we spoke with believe identifying and referring all eligible teenage parents to Cal Learn remains a significant challenge, the available data suggest that, on the whole, the various strategies being pursued are succeeding in bringing most eligible youth in the program. State planners estimated that Cal Learn would have a caseload of approximately 23,000 clients statewide. This estimate was based on data from California's AFDC Characteristics Sample, a sample representative of cases statewide, which showed that 2.3 percent of cases across the state included a teenage parent.

During 1996, the Cal Learn caseload fluctuated between 20,500 and more than 23,000; it averaged 22,000. Both the statewide AFDC caseload and the Cal Learn caseload declined between January and December 1996. Thus, the number of Cal Learn clients as a percentage of cases is close to projections, suggesting that most teenage parents are being identified and referred. Cal Learn clients as a percentage of total statewide caseload were 2.4 to 2.5 percent in 1996.

D. DEVELOPMENT, IMPLEMENTATION, AND OPERATION OF CAL LEARN

This section describes development and implementation of Cal Learn.

1. Development and Implementation

California pays out \$6 billion in cash assistance payments annually, and a high proportion of the state's population receives cash assistance (18 to 19 percent in California, compared with

12 percent nationally). Research has established that having children as a teenager, without being married, increases the likelihood of not completing high school and becoming a long-term recipient of cash assistance. California wanted to develop services for this population that would lessen their long-term welfare dependence. Accordingly, focusing services on teenage parents was a key feature of Governor Wilson's welfare reform plan. Initial legislative proposals for Cal Learn were put forth in 1991, and it was established as part of the California Work Pays Demonstration enacted through Senate Bill 35 in June 1993.

The legislation culminating in Cal Learn involved extensive negotiations between interested legislators and executive branch staff. California policymakers initially intended to replicate Ohio's LEAP program. However, they decided to monitor progress, as measured by report card grades, rather than attendance per se, as was done in LEAP. In part, this was a philosophical decision: California policymakers believed that progress, not merely "seat time," should be rewarded. But fiscal considerations also played a role in the decision, as California planners recognized the difficulty and expense of establishing new systems to monitor attendance consistently across the state. California school districts operate autonomously, with diverse attendance standards and diverse definitions for excused and unexcused absences. Also, data systems for capturing attendance data at the individual student level in consistent formats do not exist. Policymakers regarded as too high the costs of negotiating standards and developing the requisite data collection systems. They decided, instead, to link bonuses and sanctions to "progress in school," and chose report card grades as the measure. Planners believed this approach would be simpler to implement, so they prescribed that sanctions and bonuses be tied to progress as measured by up to four report cards in a 12-month period. Even this simpler approach, however, raised a host of operational issues that the state and counties continue to struggle with (see Section D.6).

2. Cal Learn's Case Management Model: The Adolescent Family Life Program (AFLP)

An important aspect of Cal Learn operations is that AFLP agencies provide case management services in many counties. AFLP was developed as a demonstration project in the early 1980s, with state and federal funding through the Department of Public Health and the public health system. The program used a holistic approach, which sought to address simultaneously the many problems teenage parents and their children face: lack of health care, precarious living situations, social isolation, poor educational opportunities, and the teenage parent's immaturity and lack of parenting skills. The program's initial goals were to improve birth outcomes (reduce the incidence of low birth weight), improve educational outcomes, increase parenting skills, and reduce repeat pregnancies. These goals were to be achieved primarily by providing case management services that link teenage parents and their children to the services they need and by advocating on behalf of the teenage parents. An evaluation of the demonstration by researchers at the University of Southern California found that the program met all its goals (Thiel et al. 1990).

After the demonstration, the California Department of Health Services, Maternal and Child

Health Branch sought to expand the program. In 1985, AFLP was launched statewide, with 37 AFLP programs in 32 of California's 58 counties. By 1989, AFLP programs operated in 43 counties, and by 1997, 45 counties. Current funding for AFLP is \$19.3 million, of which \$10 million comes from general state funds and \$9.3 million from federal funding.

The AFLP standards specify the following program goals and elements:

- **AFLP Administration and Management.** AFLP providers must fulfill administrative and management functions necessary to achieve the goals of AFLP.
- **Network Coordination.** Adopting a systemwide, long-term perspective, AFLP providers participate in network coordination in their communities to improve services for pregnant and parenting teenagers and their families.
- **Outreach and Case Finding.** The AFLP provider conducts outreach to identify adolescent women younger than 18, who are pregnant or have one or more children.
- **Intake.** To enroll clients in the program, the AFLP provider has a structured process in which clients are fully informed about the program and their responsibilities.
- **Initial Client Assessment.** The AFLP case manager systematically collects, records, and analyzes information about the client to establish a baseline for developing an initial, comprehensive Individual Service Plan (ISP).
- **Planning.** An ISP will be developed with each client after the initial assessment. The ISP specifies the goals for the client and her family and delineates services and activities to meet those goals. It will be reviewed at least quarterly and, if necessary, revised.
- **Implementation.** The AFLP case manager facilitates client access to and use of available public and private services specified in the ISP.

Monitoring and Evaluation. The AFLP case manager monitors the client's progress on a monthly basis through contacts with clients, service providers, and third parties, to determine how effectively services are being provided and to gauge the client's progress toward her goals.

The Cal Learn program combines a strong focus on financial incentives for school performance and the holistic case management approach embodied in AFLP. At the time Cal Learn was conceived, AFLP was in place and it had a strong focus on teenage parent clients and linkages with support service networks. Yet, joining the two central elements--fiscal incentives for school attendance and AFLP case management--represented a last-minute compromise in the legislative process. Some legislators wanted the new program for teenage parents on welfare to focus primarily on the school attendance requirement; others wanted simply to expand AFLP without imposing a school attendance requirement. The result was a compromise that combined the two ideas: Cal Learn focuses on school progress and introduces financial incentives, but the legislation grants AFLP contract agencies the right of first refusal to operate Cal Learn and requires that the programs not operated by AFLP agencies adhere to AFLP program standards. Currently, county welfare departments contract with a local AFLP agency

to operate Cal Learn in 27 California counties, which have 93 percent of Cal Learn clients statewide. In 22 counties with five percent of the caseload, the county welfare department operates Cal Learn; in the remaining counties, another agency operates Cal Learn, or the county welfare department and AFLP operate Cal Learn jointly.

3. Learning to Work Together

Implementing Cal Learn required that welfare agencies and health agencies work together at the state and local levels. Welfare agencies were eager to operate Cal Learn, because it serves welfare clients and is administered through GAIN. At the same time, welfare agency staff were not familiar with the work AFLP agencies were doing. At the local level, county welfare agencies also were concerned about the ability of an agency that served a relatively small number of voluntary clients to increase the scale of its operations and to serve clients whose participation is mandatory. For example, Sacramento County's AFLP program served 150 teenage parents at the time Cal Learn was implemented. The county welfare department was concerned about the program's ability to expand and serve a projected 1,500 Cal Learn clients. County welfare departments were also hesitant to accept the task of making determinations on sanction and bonus amounts while the case management work on which these actions would be based was to be conducted under contract by another agency.

On the other side, AFLP managers and staff came from backgrounds in health service delivery and social work. They were accustomed to serving all teens seeking their services without imposing requirements or requiring documentation. Thus, the welfare system's concept of "eligibility," the fiscal incentives of sanctions and bonuses, and the extensive documentation necessary to ensure payment integrity and adherence to due process requirements were foreign to AFLP program staff. Furthermore, AFLP providers assumed that the eligibility side with its rules and regulations would lead to excessive attention being paid to the rules and school attendance, and would detract from their ability to provide comprehensive case management. Since AFLP agency staff saw themselves as advocates for the teenagers, many resisted the concept of sanctions in a mandatory program.

Staff expressed concern that Cal Learn's focus on school progress would distort AFLP's holistic approach to teenage parents' many problems. Some staff expressed the view that school should not be given the highest priority for young teens in unstable living situations or abusive relationships. Another concern is with interference in the emphasis AFLP case management traditionally places on developing a long-term relationship between the case manager and the teenage parent. The AFLP model emphasizes working with teenage parents as early as possible, and continuing to work with them even if the teenage parent initially refuses help. Persistent interest in the teenage parent and her child often helps establish trust, that lets the case manager be of assistance when the teenage parent becomes ready to accept it.

Two elements of Cal Learn work against the establishment of long-term relationships. First,

many teenage parents come into Cal Learn just before they turn 19 and are no longer subject to Cal Learn requirements. Although this is a natural consequence of the fact that the preponderance of births to teenagers on welfare is among older teenagers, it shortens the period when case managers can work with them. California's welfare reform legislation (Assembly Bill 1542) has addressed this problem by extending Cal Learn eligibility, on a voluntary basis, for 19-year-old teenage parents who enter the program by the age of 18 and have not yet graduated from high school. Second, girls become ineligible for Cal Learn if they stop receiving welfare, a restriction not present in AFLP.

4. Moving Clients into Cal Learn and Sharing Information Between Agencies

Developing procedures for moving clients into Cal Learn, providing services for them, and conveying information about client activities between Cal Learn and a county welfare department posed challenges for both agencies. Because the Cal Learn program can affect a family's AFDC grant, careful record keeping and adherence to notice and due process requirements are essential. Because Cal Learn involves welfare department eligibility workers, GAIN staff, and Cal Learn contract agency staff, information flows and data systems are complex. Staff in both counties reported that developing the necessary procedures required patience and flexibility. Here, we outline the Cal Learn intake procedures.

Eligibility workers refer teenage parents 18 or younger to Cal Learn. The Cal Learn program sends each new Cal Learn client a notice inviting them to attend Cal Learn orientation. At orientation for a new client, Cal Learn staff explain Cal Learn program requirements and services and assign the client to a case manager. After orientation, the case manager contacts the client and arranges a time to conduct the intake interview and assessment, usually (though not always) in the client's home. On the basis of the assessment, the case manager helps the client identify and arrange for necessary services, including an appropriate educational program if she is not in school and child care if she needs it. The case manager also establishes a report card schedule. During the first 90 days in Cal Learn, the client cannot receive a sanction or bonus; therefore, she does not have to submit a report card. After the initial 90-day period, however, she must submit up to four report cards in a 12-month period to receive a bonus and avoid a sanction.

All identified custodial parents who are eligible for Cal Learn are subject to the requirement to make progress in school, whether or not they choose to receive case management and support services. Accordingly, clients who fail to attend the initial orientation are mailed a formal notice stating Cal Learn requirements, a notice that they have not carried out a required program activity, and a new request to attend an interview. Clients who respond to the second notice receive orientation and other services. Those who miss the second orientation are sent a notice stating when report cards are due and notifying them that cash assistance may be reduced if they fail to submit a report card when one is due. The Cal Learn staff maintain up-to-date report schedules for each of the county's school districts. The staff can then assign a report card schedule to each client who does not attend orientation, on the

basis of the school district in which she resides.

Integrating these notification requirements into the workloads of case managers posed a challenge for the Cal Learn managers. Case managers in both Santa Clara County and Sacramento County initially found the paperwork requirements of the welfare system formidable. They felt that the requirements interfered with their ability to carry out the basic task of working directly with clients. To alleviate the case managers' clerical burden, program managers in both counties have, to varying degrees, moved responsibility for tracking cases, sending forms to clients, and entering data into computer systems away from case managers and into a separate administrative support unit.

In Santa Clara County, more of the responsibility for case tracking has shifted from case managers to a Cal Learn administrative unit. In Santa Clara County, specialized administrative staff notify clients about orientation, conduct orientation, and follow up with subsequent notices to clients who failed to attend orientation or to contact Cal Learn for an interview. Case managers are assigned after a client attends orientation.

In Sacramento County, Cal Learn case managers retain more of the responsibility for sending required forms and following up to bring into the program teenage parents who do not attend orientation. A case manager is assigned to each client before orientation, to facilitate the intake and follow-up process. The clerical support unit checks information in the county welfare data system, which Cal Learn needs to conduct effective case management and to ensure accuracy for invoicing purposes. It also enters data into Lodestar, the database used for Cal Learn internal management and for providing data for ad hoc reporting to the county and state.

Each county also has an elaborate system through which Cal Learn case managers communicate requests to the county welfare department for bonuses and sanctions and for child care and other support services. The Cal Learn case manager is responsible for sending official notices to clients notifying them of their Cal Learn program obligations or informing them that they are not in compliance and may have their grant reduced if they do not show good cause. However, ultimate legal authority for requesting a bonus or sanction resides with the GAIN program. Accordingly, Cal Learn case managers send a recommendation for a bonus or sanction to GAIN, where a GAIN worker makes a final determination on the bonus or sanction request and initiates a request to an eligibility worker to impose the sanction or pay the bonus. Clerical support units in both county Cal Learn programs fulfilled similar functions in facilitating this information flow.

Cal Learn staff in both counties emphasized the important role county GAIN staff played during the two-year period of Cal Learn operation in helping Cal Learn staff understand the program rules and in facilitating the timely flow of information between Cal Learn and the welfare agency.

5. Types of School Programs

California law requires that each person between the ages of 6 and 18 attend school full time. Many pregnant and parenting teenagers in California enroll in regular school programs--junior high and middle schools and comprehensive high schools. In addition to regular school programs, pregnant and parenting teenagers in California have the following education options:

- **Adult Education.** All minor pregnant and parenting students may enroll in adult education programs, either with "adult status" or concurrently within the K-12 program.
- **Continuation Education.** Youths 16 to 18 years of age may enroll in continuation education to work toward a diploma. Minimum attendance is 15 hours a week if not employed and 4 hours a week if employed.
- **County Pregnant Minor Parent Programs.** Eighty-five programs in 17 counties serve pregnant girls under the age of 18 who have not completed a high school education and whose pregnancy has been verified. Full-time participation is four hours a day and may continue for one semester following the semester in which the pregnant minor delivers.
- **Court and Community Schools.** These schools serve students who have been expelled from regular school, are chronically truant, are on probation or parole and not attending school, or are homeless. Students in these programs can work toward a diploma.
- **Home and Hospital Instruction.** Programs of home instruction for students who experience a temporary physical, mental, or emotional disability while in regular school classes and can reasonably be expected to return to regular classes.
- **Independent Study.** Independent study provides a flexible education program for students. It may be part-time study connected with classroom instruction or a full-time program separate from traditional classroom instruction. It must be covered by a district policy and must be voluntary for both student and school.

Opportunity Schools and Programs. Programs with specialized structure and learning environment that are designed to help at-risk students develop the tools and positive self-image to stay in or return to regular school and succeed there.

The School Age Parenting and Infant Development (SAPID) program, which provides child care in or near the school and, in some sites, transportation to and from the school and child care center, is available in some districts. Student participation in parenting education is a required part of SAPID.

Cal Learn clients use the full range of education programs (Table B.1). Comprehensive high school programs and adult education programs leading to a GED certificate are the most common school setting. Approximately 40 percent of clients in Sacramento County and 27

percent in Santa Clara County were in one of these two types of programs. Continuation school and alternative school together accounted for approximately 20 percent of placements in each county. Other programs--elementary and middle schools, court and community schools, private schools, and others--each accounted for a small percentage of the placements. About 12 percent of clients in Sacramento County and 19 percent in Santa Clara County attended special programs for pregnant and parenting teenagers.

TABLE B.1
SCHOOL PROGRAMS OF CAL LEARN CLIENTS ACTIVE IN CAL LEARN IN FEBRUARY
1996:
SACRAMENTO COUNTY AND SANTA CLARA COUNTY

| | Sacramento County | Santa Clara County |
|---|-------------------|--------------------|
| Percentage in Each Type of School Program ^a | | |
| Elementary school | 0 | <1 |
| Junior high/middle school | 1 | 3 |
| Comprehensive high school | 19 | 16 |
| Continuation school | 15 | 9 |
| Court/community | <1 | 1 |
| Alternative school | 8 | 11 |
| Adult education | 21 | 11 |
| Private school (K-12) | <1 | 0 |
| Other | 3 | 4 |
| Not applicable | 29 | 32 |
| Unknown | 4 | 13 |
| Total | 100 | 100 |
| Percentage in a School Program for Teenage Parents ^a | | |
| County pregnant parenting program | 1 | 6 |
| School Parenting and Infant Development (SAPID) | 7 | 1 |
| Other pregnant/parenting program | 4 | 13 |
| Not applicable | 84 | 67 |
| Unknown | 4 | 13 |
| Total | 100 | 100 |
| Number of Clients with Data on Schooling in Cal Learn Management Information System (MIS) | 1,094 | 419 |
| Total Number of Clients Active in Cal Learn ^b | 1,161 | 548 |

Source: Tabulations from the Cal Learn MIS (Lodestar).

Note: Data pertain to clients who were enrolled in Cal Learn as of the end of February 1996. Since data in Lodestar for each client may include multiple records (reflecting the completion of an intake interview and perhaps subsequent follow-up interviews), tabulations are based on the earliest Cal Learn intake or follow-up form completed in 1996. If the client had not completed an intake or follow-up form in 1996, data from the last form in 1995 was used.

^a Percentages are based on cases with information on schooling in the Cal Learn MIS (n = 1,094 in Sacramento County; n = 419 in Santa Clara County)

^b Total number of clients active in Cal Learn exceeds number of clients with data on schooling in the Cal Learn MIS because some active clients do not complete an intake interview or receive Cal Learn services. School program is not known for these individuals.

Under Cal Learn, the education program must lead to a high school diploma or its equivalent. To encourage participation in school, sanctions and bonuses are issued up to four times in a 12-month period, based on school progress as indicated on report cards. Initially, these requirements appeared to preclude enrollment in English as a Second Language (ESL) courses as appropriate placements because ESL courses generally do not lead to a high school diploma or its equivalent. State policy was clarified to allow Cal Learn students to be enrolled in ESL, provided ESL is necessary for the student to make progress toward a high school diploma.

Cal Learn legislation presumed that students would be enrolled in a traditional, comprehensive school that issues four report cards during each school year. In reality, many schools--particularly those that offer alternatives to a traditional, comprehensive program--issue report cards more frequently or less frequently than four times a year; and some issue no report cards at all. Initially, Cal Learn regulations specified that only report cards issued for all students were allowable. However, requirements were clarified to allow Cal Learn staff to negotiate special arrangements with programs that do not issue report cards. Such arrangements with these schools must apply to all Cal Learn students in school and must allow for both bonuses and sanctions.

During the planning phase for implementing Cal Learn, staff realized that some teen parents faced school residency barriers for enrolling in school. Because the statute specified that minor students could register only in the school district in which their parent/legal guardian resided, youth, including teenage parents who did not live with a parent/legal guardian, were usually unable to enroll in school. In 1994, the statute was amended (Chapter 98, Statutes of 1994) to allow a student living with a caregiver adult, upon submission of a signed affidavit, to enroll and receive school-related medical care in the district within which the caregiver resides.

6. Administering Bonuses and Sanctions

At orientation, Cal Learn clients are told that they must establish a report card schedule within 90 days and that after 90 days they must submit their report card to the case manager. They are eligible for a bonus of \$100 if they receive a "C" average or better, but they are assessed a sanction of \$100 if they fail to submit a report card or if it shows a "D" average or below. All teenage parents enrolled in Cal Learn are subject to the report card requirements, whether or not they receive Cal Learn case management services. Exempt teenage parents receive no Cal Learn program services. Deferred teenage parents continue to receive case management services, but they are not eligible for support services or bonuses and sanctions. Reasons for exemption are:

- A serious illness or injury prevents attending school for three months or longer.
- The student is expelled from school, and no school alternative can be arranged.
- Necessary child care or transportation services are unavailable or cannot be provided for three months or more as a result of lack of funding.

An AFDC-Foster Care payment is being made on behalf of the teenage parent.

Deferred teens continue to receive case management services but are not eligible for support services and bonuses or subject to sanctions. Deferral reasons are:

- Needed child care or transportation services are unavailable for less than three months.
- Case management services are not available.
- A special need that prevents the teenage parent from meeting program requirements cannot be met.
- A physician prescribes a period of recovery after the birth of a child.

Each client is supposed to submit the report card to the case manager by a designated due date, which is typically 10 days after the client receives it. After the due date, a reasonable-effort period follows, during which (1) the client can submit the report card late, and (2) the case manager must make a reasonable effort to let the client know a report is due and a sanction will be assessed if it is not submitted. If the report card does not demonstrate adequate progress, a sanction of \$100 is assessed unless the client can show good cause. If no report card is submitted, a sanction of \$100 is assessed. If a report is submitted late (and within the reasonable-effort period) but demonstrates good progress, a sanction of \$50 is assessed. To receive the \$100 bonus, the student must submit the report card on time and the report card must demonstrate adequate progress. For implementing the bonus or sanction, the case manager makes a formal recommendation to the GAIN worker (through a form designed for this purpose) who notifies the eligibility worker to implement the sanction or bonus through the automated Case Data System (CDS).

Cal Learn's financial incentives appear to be administered effectively in Sacramento and Santa

Clara counties and to affect the benefits of most Cal Learn clients. In 1996, about six percent of cases in Sacramento and five percent of cases in Santa Clara received a sanction each month on average (Table B.2). Slightly higher percentages received bonuses (eight and seven percent, respectively, in Sacramento and Santa Clara). The higher turnover in Santa Clara's Cal Learn caseload, which places more of the caseload in the 90-day period before a Cal Learn client is eligible for sanction or bonus, accounts for the small differences in sanction and bonus rates in the two counties.⁽²⁾ To provide perspective, we made a rough estimate of the average percentage of cases each month who had been participating in Cal Learn long enough to qualify for a sanction or bonus. We found that 25 percent were qualified each month in Sacramento and 21 percent in Santa Clara.⁽³⁾

TABLE B.2
AVERAGE MONTHLY RATES OF SANCTION AND BONUS RECEIPT DURING 1996 FOR CAL LEARN CLIENTS IN SACRAMENTO AND SANTA CLARA COUNTY

| | Sacramento County | Santa Clara County |
|---|--------------------------|---------------------------|
| Average Number of Cal Learn Cases | 1,212 | 468 |
| Average Percentage of New Cases | 6 | 9 |
| Average Percentage of Cases Leaving Cal Learn | 8 | 9 |
| Average Percentage of Cases Assessed a First-Month Sanction | 6 | 5 |
| Average Percentage of Cases Receiving a Bonus | 8 | 7 |
| Estimated Average Percentage of Cases Eligible for a Bonus or Sanction ^a | 25 | 21 |

Source: Tabulations of data from Cal Learn's Stat-45 Reports provided by the California Department of Social Services.

^a Estimated as $(1 - (\text{average percentage leaving Cal Learn} \times 4))/3$. The estimate assumes new cases will not receive a sanction or bonus during the first four months and that, in any month, one-third of those required to submit a report card may receive a bonus or be assessed a sanction.

For Sacramento = $(1 - (.06 \times 4))/3 = .25$

For Santa Clara = $(1 - (.09 \times 4))/3 = .21$

Therefore, we estimate that about 56 percent of people who qualified for a bonus or sanction

in Sacramento actually received one ($(8 + 6)/25 = .56$) and 57 percent did so in Santa Clara County ($(5 + 7)/21 = .57$). The approximately 46 percent of cases who qualified for a sanction or bonus but did not receive one are in one of several situations: (1) they received a "D" report card, which was sufficient to avoid a sanction but not to receive a bonus; (2) they were participating in a GED or other program that did not have report cards; or (3) an error was made in not assessing a sanction or paying a bonus. While we cannot tell how many of the 45 percent who qualified for a bonus or sanction did not receive one, overall, these data strongly suggest that, in most cases, Cal Learn's financial incentives were applied appropriately. The available data on sanctions and bonuses indicate that Cal Learn's financial incentives affect the benefits of most Cal Learn clients.

Most Cal Learn case managers in Sacramento and Santa Clara counties have reservations about the bonus and sanction elements of the program. Some view the bonuses as a way of getting more benefits to clients to partially offset the loss in income from reductions in the real value of benefits over time. Others thought it was good that the system tells teenage parents in a concrete way that "school is very important and if you chose not to go, consequences will follow." Yet many think school is not the highest priority for clients who are homeless or in abusive situations, but a problem that can be dealt with after more pressing crises have been resolved. Some case managers also questioned how much the fiscal incentives mattered. One expressed the view that sanctions and interim bonus payments made little difference in the behavior of most teens. For one thing, the incentives are relatively small (a \$100 sanction assessed over two months for each report card due or \$100 bonus for each report card due in a 12-month period). For another, a teenage parent on her parent's cash assistance case would not necessarily see either the bonus or the grant reduction, because progress incentives are paid to the assistance unit as part of the grant, rather than directly to the teenage parent. (The \$500 high school completion bonus is paid directly to the teenage parent, however.) This case manager thought that long-term, persistent attention and showing that someone cared were more important factors than financial incentives in turning girls around and getting them back into school.⁽⁴⁾

Our informal review of a small number of case records supports the view that long-term, persistent attention helped return some clients to school. We saw case files of several teenage parents who remained out of school for long periods (and presumably received sanctions that did not alter their behavior). But then they experienced some life change--most often, leaving a boyfriend--or matured to the point where they wanted to return to school. At that point, these teenage parents were receptive to a case manager who had shown persistent interest in their well-being by staying in contact over many months even though they refused to go to school. We did not review enough cases to estimate the frequency with which this occurred, but we saw the pattern often enough to lend credibility to case managers' reports that this behavior pattern is common.

Several operational issues have arisen in implementing the bonus and sanction policy. The use of report cards as the measure of progress and incentives linked to grades brings operational

complexities, despite the simple, intuitive appeal of report cards. Making sure teenage parents understand the rules, establishing report card schedules and changing them as necessary, dealing with special situations in which the school does not have a four-point grading scale with four report cards per school year, administering sanctions, and determining whether good cause exists are all complex and time-consuming. In recognition of the staff burden, Cal Learn case managers may have no more than 40 clients. As a rough gauge of the amount of staff time that goes into administering report card requirements, one Cal Learn manager estimated that she could reduce her staff by about one-fourth (while still meeting all other AFLP service standards) if the Cal Learn report card requirements were eliminated.

Use of grades as the measure of progress introduces some unforeseen inequities. Districts and even schools within the same district have different grading criteria. Cal Learn staff reported that some districts never give less than a "B." Other districts do not use grades at all, and some nontraditional schools do not measure student progress on a four-times-per-school-year basis that would permit a student to earn an interim bonus. GED programs, which appeal to teenage parents who have dropped out of school, present a special problem in this regard. All students may enroll in GED programs, can avoid sanctions by attending, and can receive the completion bonus. But students attending GED programs are not eligible for interim bonuses unless the GED program establishes a system for measuring progress.

Some elements of program operation cut the link between actions and consequences, thereby lessening the effects of fiscal incentives. One factor is that embedded teenage parents may never see the bonus payment or feel the sanction, since the grant goes directly to the head of the assistance unit. Another factor stems from the time frame in which sanctions are applied. Sometimes a case may be assessed a sanction after submission of a report card deserving a bonus. This can occur when the time required for reasonable effort and the need to assess the sanction in two separate months coincides with a report card schedule in which report cards are less than three months apart. It can also occur if eligibility workers do not process the bonuses and sanctions in a timely manner, due to workload.

7. Child Care

Cal Learn staff reported that many Cal Learn participants do not like to use formal child care providers. Many teenage parents believe that good parents do not leave their babies with strangers. Most are not well-informed consumers of child care; thus, they are insecure about judging the quality of care and standing up for their rights as consumers. Several staff mentioned recent media attention to abuses that have occurred in child care centers and informal child care homes.

These attitudes about child care, coupled with schools' perceived reluctance to have teenage parents attend regular school programs, leads some teenage parents to select school programs that may not be in their best interest. Cal Learn staff said many districts do not like

to serve the teenage parents in their regular school programs. In addition, the number of slots in special school programs for teenage parents is limited. Because of these factors, many teenage parents select schooling options (such as "independent study") that require limited use of child care. Yet, teenage parents must often overcome the opposition of families and boyfriends to persevere in school. Thus, case managers view the selection of independent study as harmful because it reinforces the young parent's isolation and discourages her efforts to find support systems outside the home that will help sustain efforts to complete school.

In part, because of teenage parents' attitudes toward child care, Cal Learn funding for child care has been more than adequate. In fact, authorized funds have not been fully used because the demand for subsidized child care has been less than anticipated. Staff reported also that reimbursement rates for subsidized care are adequate. GAIN and Cal Learn pay at the 93rd percentile of rates for child care providers in an area. Teenage parents and schools like programs with child care on-site: the program can incorporate parent training with the school program and knows that the teens are in school. However, since very few programs with on-site care exist, this is not an option for most Cal Learn clients.

FOOTNOTES

1. Under GAIN, counties receive reimbursement for support services up to a specified annual allocation it funds for support services. Under Cal Learn, support services costs and all other costs are considered an entitlement, and counties are reimbursed the amounts claimed, with no annual limit.
2. First-month sanctions, as a percentage of all cases less cases in the first three months of Cal Learn enrollment, are seven percent in both Sacramento and Santa Clara. Bonuses, as a percentage of all cases less cases in the first three months of Cal Learn enrollment, are 10 percent in both counties.
3. Details of the estimate are presented in the note to Table B.2.
4. The evaluation of Cal Learn being conducted by U.C.-Davis is designed to address the relative importance of case management and financial incentives in achieving high school completion and other Cal Learn objectives.

Where to Now?

Implementing Welfare Reform Requirements for Teenage Parents: Lessons from Experience in Four States

APPENDIX C CASE STUDY OF MASSACHUSETTS

As part of Welfare Reform '95, the state's welfare reform initiative implemented in November 1995, Massachusetts imposed two new requirements for teenage parents receiving cash assistance. First, teenage parents (including those age 18 and 19) without a high school diploma or its equivalent are required to attend school or a GED program or face reduction or elimination of their cash grant. Second, minor parents (those under age 18) who receive cash assistance are required to live with an adult relative or legal guardian or in a state-sponsored group home for teenage parents. Unless they qualify for an exception, minor parents who fail to comply will have their cash assistance cases closed and their applications for assistance denied.

A. OVERVIEW OF THE NEW REQUIREMENTS

1. School Attendance Requirement

Specific Requirements. As part of Welfare Reform '95, Massachusetts imposed a statewide school attendance requirement for teenage parents (including 18- and 19-year-old parents) who receive cash assistance and who do not have a high school diploma or its equivalent. A teenage parent can satisfy the attendance requirement by attending a regular high school or another program leading to a high school diploma or by attending a GED program. However, if the GED program meets for less than 20 hours per week, the teenage parent must engage in part-time employment, community service, vocational training, or other similar activity to bring the total time in education or training to at least 20 hours per week.

Monitoring. The Department of Transitional Assistance (DTA), the agency that administers the state's cash assistance program, monitors the attendance of teenage parents monthly by requiring them to have an attendance form completed by their high school or GED program. It is up to the teenage parent to take the form to the school or program and, in most cases, to see that it is returned to the welfare office.

Enforcement. A teenage parent who misses more than 25 percent of scheduled days without "good cause" during a month is sanctioned. If the parent does not have an acceptable excuse, cash benefits are reduced by her portion of the grant. If the teenage parent heads her own cash assistance case and fails to comply within 30 days after this initial sanction, the entire

case is closed. If she is receiving cash assistance on someone else's grant and fails to comply within 30 days, the case remains open, but the needs of both the teenage parent and her child or children are removed from the grant.

2. Minor Parent Living Arrangement Requirement

Specific Requirements. Under Welfare Reform '95, unmarried custodial parents under 18 who receive cash assistance are required to live with a relative or legal guardian who is at least 20 years old. Minor parents who claim they have no adult relative with whom they can live are referred to the Department of Social Services (DSS), the state agency that handles child welfare issues. DSS investigates the minor's living and family situation and verifies whether the minor cannot live with a relative.

If DSS determines that the minor parent cannot live with a relative, she is referred to the Teen Living Program, which operates 22 group homes for teenage parents throughout the state. These residential facilities provide 24-hour adult supervision and offer counseling services and parenting and life skills classes. The Teen Living Program was created as part of Welfare Reform '95 and is managed jointly by DTA and DSS.

Monitoring. The living arrangements of a minor parent who heads her own cash assistance case is verified at application, at case review (which occurs about every six months), and whenever she reports a change of address. The minor parent must have her landlord and the primary tenant on the lease affirm, on a form provided by the welfare office, that she lives at that address and that the primary tenant is a relative. The relationship to the primary tenant must be verified using birth certificates or, in some cases, sworn affidavits from friends or neighbors.

Enforcement. A minor parent who is receiving cash assistance and refuses to comply with the living arrangement requirement will have her cash assistance case closed. She will remain eligible for Food Stamps and Medicaid, however. If a minor parent is applying for cash assistance and is unwilling to comply with the requirement, her application will be denied.

3. The Number of Cases Requiring Regular Monitoring Under the New Provisions

Cases that require school attendance monitoring represent a small fraction of the full caseload. In December 1996, approximately 4,800 teenage parents received cash assistance statewide, which represents about six percent of all cash assistance cases (see Table C.1).⁽¹⁾ Analysis of DTA automated data from the two local offices visited for the study suggests that more than a third of teenage parents receiving cash assistance already have a high school diploma or a GED certificate and thus are not subject to the attendance requirement. Therefore, less than four percent of cash assistance cases are subject to monthly monitoring of school attendance.

Regular monitoring of living arrangements required for a particularly small fraction of cash assistance cases. Less than two percent of cash assistance cases include a minor parent (Table C.1). Moreover, DTA monitors only the living arrangements of minor parents who head their own cases, since those on someone else's case are assumed to be in compliance with the requirement.

TABLE C.1

NUMBER OF TEENAGE AND MINOR PARENTS RECEIVING CASH ASSISTANCE IN DECEMBER 1996

| | Minor Parents (Those Under 18 Years Old Only) | Teenage Parents (Including 18- and 19-Year-Olds) |
|---|---|--|
| Number | | |
| Who receive cash assistance ^a | 1,219 | 4,802 |
| Who head their own cash assistance cases | 512 | 4,081 |
| On someone else's cash assistance case ^a | 707 | 721 |
| Percentage of Cash Assistance Cases: | | |
| That contain a teenage or minor parent ^a | 1.5 | 6.0 |
| Headed by a teenage or minor parent | 0.6 | 5.1 |

Source: Massachusetts Department of Transitional Assistance (DTA) data and MPR estimates.

^aStatewide figures on the number of teenage or minor parents on someone else's cash assistance case were not available. Therefore, the number of these cases was estimated using data from 2 of 39 local DTA offices and assuming that the proportion of teenage or minor parents who were on someone else's case was the same statewide as it was in these two local offices.

Therefore, less than one percent of cash assistance cases (or about 500 minor parents statewide) are subject to regular living-arrangement monitoring associated with the requirement.

B. ORGANIZATION OF PROGRAMS AND RESPONSIBILITIES

1. Teen Specialists

In order to facilitate implementation of the new teenage parent requirements imposed under Welfare Reform '95, DTA created a new class of case workers to work with teenage parents receiving cash assistance. These special case workers, known as "teen specialists," were recruited from the existing pool of DTA case workers. A few local offices converted to the teen specialist model soon after Welfare Reform '95 took effect in November 1995; however, most offices had no teen specialists in place until the end of 1996. In early 1997, there were 65 teen specialists statewide serving about 4,500 teen parents. Teen specialists typically handle 65 to 80 cases, whereas the average caseload size for other case workers is about 110 in offices where case workers handle both ongoing cases and applications for assistance and 150 in offices where case workers handle only ongoing cases.

Teen specialists are responsible for monitoring compliance with the school attendance and living arrangement requirements and for offering referrals and counseling to help teenage parents comply with these mandates. In some offices, teen specialists also handle eligibility determination for teenage parents applying for cash assistance. Eventually, teen specialists in all local DTA offices will handle teenage parent applications.

In spring 1997, DTA added another responsibility for teen specialists: conducting annual home visits for all teenage parents receiving cash assistance. Through these home visits, according to DTA officials, teen specialists will monitor the general living conditions of their caseload and will be on the lookout for signs of sexual or physical abuse or child neglect for possible referral to DSS. The visits will also serve as a means of monitoring compliance with the minor parent living arrangement requirement. To prepare teen specialists for conducting home visits, DTA held an all-day training session. This session included training from social workers from the Massachusetts Society for the Prevention of Cruelty to Children on recognizing signs of physical, sexual, and emotional abuse and child neglect. Initially, the union representing DTA case workers expressed safety concerns regarding the plan for teen specialists to conduct home visits. DTA addressed this concern by allowing teen specialists to conduct home visits in pairs.

Time constraints limit some teen specialist activities. Monitoring and referral associated with the attendance and living arrangement requirements, eligibility determination, and home visits demand substantial amounts of time on the part of teen specialists. Because of their caseload sizes, they have little, if any, time to counsel clients on pregnancy prevention, good parenting techniques, money management, and other life skills. Although this type of counseling is not part of the teen specialists' job description, staff in both local DTA offices visited for the study thought training in parenting and life skills was sorely needed and should be mandatory for teenage parents. They regretted the lack of time for these activities.

Similarly, teen specialists typically do not have time to contact their clients' education providers on a regular basis to discuss the teenager's progress in the program. The director of a GED program serving more than 40 teenage parents receiving cash assistance reported that her staff had little contact with teen specialists, which she thought unfortunate, because it reduced the quality of the case management that both her staff and DTA staff were able to provide. If teen specialists and education providers shared more information, she suggested, they might be in a better position to identify and address problems and barriers facing the teenage parents they serve.

Broad support exists for the teen specialist model. When asked the lessons they had learned from the first year of operating under the new teenage parent requirements, DTA staff members at the state and local levels most often pointed to the importance of teen specialists. Staff members supported the model because (1) it made sense operationally to have only a few staff members in each office learn the special rules for teenage parents; (2) community agencies that serve teenage parents like to have only a few individuals serving as their point of contact with the welfare office; and (3) by focusing exclusively on teenage parents, teen specialists were able to become familiar with the support services available to young parents in the community and, therefore, better serve this population.

2. Relationship Between the Attendance Requirement and the JOBS Program

The teenage parent school attendance requirement imposed as part of Welfare Reform '95 revises and expands an existing attendance requirement imposed through the Employment Services Program (ESP), the state's Job Opportunities and Basic Skills (JOBS) program. ESP, which began in 1993, requires all out-of-school teenagers (including those with children) who are at least 16 years old and who do not have a high school diploma or its equivalent to attend school or another education or training activity. Those who do not comply have their needs removed from the cash assistance grant.

Welfare Reform '95 revised this requirement in several ways. First, it expanded the attendance requirement for teenage parents to include those who were younger than 16. Second, it required that teenage parents who are not high school graduates pursue a diploma or GED certificate instead of a more general education or training activity. Finally, it increased the maximum sanction for noncompliance: teenage parents out of compliance for more than 30 days have their needs and the needs of their children removed from the grant.

As was the case before Welfare Reform '95, a teenage parent with a diploma or its equivalent is exempt from ESP education or training requirements as long as she has a young child. However, if she has no child under six (which would be extremely rare for a teenage parent), she may be required to participate in an ESP activity or face sanction. In all cases, teenage parents remain on the caseloads of teen specialists until they turn 20.

C. IDENTIFYING TEENAGE PARENTS RECEIVING CASH ASSISTANCE

1. Initial Identification of Teenage Parents

DTA staff members indicated that, when Welfare Reform '95 began in November 1995, the initial identification of teenage parents who headed their own cash assistance cases was straightforward and posed no problems. DTA's central computer system could easily flag all cases in which the head was under 20 and was the parent of someone on the grant. In contrast, identification of teenage parents on someone else's cash assistance case ("embedded" teenage parents) proved to be much more difficult. DTA's computer system does not identify relationships beyond those of the person who heads the case. Moreover, at that time, the computer system had no field for flagging teenage parents. Therefore, when Welfare Reform '95 was implemented in November 1995, it was not possible to identify all teenage parents in an automated fashion.

For this reason, DTA planned to identify embedded teenage parents by reviewing all cash assistance cases performed during the first 10 months of Welfare Reform '95. Case workers were instructed to be on the lookout for teenage parents during these reviews. DTA modified its computer system to include a field for identifying teenage parents, so that case workers could flag these cases during the review process.

2. Ongoing Identification of Teenage Parents

DTA staff members report that identification of embedded teenage parents remains an issue. For example, in spite of the addition of a teenage parent flag to the DTA computer system, local staff members expressed frustration that they were unable to generate simple printouts of the embedded teenage parents for their local office.⁽²⁾ In addition, case workers do not always use the teenage parent flag. Nevertheless, staff members expressed confidence that they were identifying the large majority of teenage parents.

Local DTA staff members mentioned several ways in which they identified teenagers who have become parents. Staff usually learn of births to teenagers on existing cash assistance cases when the client simply informs the welfare office of the birth. Although Massachusetts has a family cap, a cash assistance case still receives additional money for the first birth to a teenage parent on the case. In addition, the child of the teenager is eligible for Medicaid and Food Stamps, so clients have a strong incentive to report teenage births to the welfare office. Of course, if some cash assistance recipients misunderstand the state's family cap law, this policy may lead some recipients not to report teenage births to the welfare office.

DTA staff members also reported that the Division of Medical Assistance (which administers the Medicaid program in Massachusetts) notifies DTA of all births to families receiving cash assistance, so that the new baby is added to Medicaid. Staff described this process (which has

been in place for years) as very useful for identifying embedded teenage parent cases as they emerge.

Local DTA staff members described an informal method by which embedded teenage parents are identified. Regular case workers (those not assigned to work with teenage parents) work hard to find and flag embedded teenage parents because these potentially complicated cases are then moved off their caseloads and onto those of teen specialists.⁽³⁾ Staff members believe that the desire of regular case workers to make their workloads more manageable would soon cause virtually all teenage parents to be identified.

D. IMPLEMENTATION OF THE SCHOOL ATTENDANCE REQUIREMENT

1. Changes to the Minimum Hours Requirement

During the first few months of operation under the new attendance requirement, DTA lowered the minimum hours of participation required of teenage parents enrolled in GED programs. The legislation imposing the attendance requirement specified that, to be in compliance, teenage parents enrolled in GED programs had to attend "full time." Initially, DTA interpreted "full time" to mean 30 hours per week. If the GED program in which she was enrolled scheduled less, the teenage parent had to supplement her GED hours with community service, job or life skills training, or a similar activity. However, after a few months of operating under the attendance requirement, DTA relaxed its interpretation of "full time" to 20 hours per week. Few GED programs have 30 scheduled hours per week, so the original requirement meant that virtually all teenage parents enrolled in GED programs had to supplement the program.

After operating under the requirement for several months, DTA decided that it was too burdensome on teenage parents to spend 30 hours each week in an education or training activity. Moreover, it was quite burdensome for local offices to create and track so many additional activities. After the threshold was lowered to 20 hours per week, relatively few teenage parents needed to supplement their GED programs with other activities.

2. Good-Cause Exemptions

Teenage parents without a high school diploma or GED certificate are in violation of the attendance requirement if they miss more than 25 percent of scheduled days in a month without "good cause." DTA classifies absences as having good cause if they are excused by the teenage parent's school or GED program. However, teen specialists can excuse additional absences. DTA's central office specifies the good-cause excuses in a list identical to the one DTA created with regard to absences from mandatory JOBS education and training activities.

According to DTA staff members, illness of the teenage parent or her baby were the most common good-cause excuses for missing school. Others include the illness of the child care

provider, other problems with day care, the funeral of a family member, court appearances, and homelessness. Teenage parents are entirely exempt from the school attendance requirement during the first three months after their child's birth. Teenage parents, however, are not exempt during pregnancy unless they have a doctor's recommendation. For most good-cause excuses, DTA requires written verification.

3. Monitoring School Attendance

DTA monitors the school attendance of teenage parents on a monthly basis. Near the end of each month, DTA's computer system automatically generates an attendance form, which is mailed to all teenage parents who receive cash assistance and who have not completed high school or earned a GED certificate. It is the teenage parent's responsibility to take the form to her school or education program. Once the school or program has completed the form, the teenage parent has until the 15th of the month to return it to her local DTA office (for example, until February 15 to return the form covering attendance in January). In some cases, the school or education program mails completed attendance forms directly to the welfare office.

Teenage parents are given considerable opportunity to prove compliance. Teen specialists report that their clients often lose the attendance forms, forget to give them to their school or GED program, or fail to return the completed forms to the DTA office. In such cases, the teen specialist typically tries to telephone the teenage parent to remind her that she needed to return the form. If the form comes back reporting that the teenage parent missed more than 25 percent of scheduled days without excuse, the teen specialist attempts to contact the teenage parent to determine whether she had a good cause for not attending.

A teen specialist unable to contact the teenage parent or obtain verification that she is either attending school or absent for good cause sends her a letter stating that she is in violation of the attendance requirement. At this point, the teenage parent has 10 days to produce verification that she is in compliance before a sanction is ordered. Even then, the teenage parent still has two weeks to produce evidence of compliance and prevent the sanction from going into effect. Sanctions are imposed approximately six weeks after the month in which attendance was deficient. For example, poor attendance in January would result in a grant reduction in mid-March.⁽⁴⁾

One teen specialist identified as a significant problem the potential delay--sometimes more than six weeks--from when the teenage parent stops attending school to when the situation comes to light. The specialist who raised this concern said that she could better address the problems leading to absenteeism (such as a child care or housing problem) if she heard about it more quickly. She reported that although some education programs call the teen specialists on their own to report that the teenage parent has stopped attending, this practice is far from universal.

Attendance monitoring requires substantial effort on the part of schools and GED programs serving large numbers of teenage parents. The administrator of one such GED program in Boston reported that attendance monitoring was a substantial burden on staff time because of the large amount of paperwork involved and the fact that the program served teenage parents from seven different local DTA offices, which made it necessary to mail attendance forms to seven different locations. The GED program administrator said that she would prefer an electronic exchange of attendance information with DTA and a more-centralized reporting system that did not require sending forms to so many different offices. In spite of the concerns expressed by this provider, DTA staff members said that schools and GED programs had been very cooperative with the attendance-monitoring process.

4. Results of a Review of Teenage Parent Case Files

As part of the study, MPR staff members reviewed 164 case files of teenage parents receiving cash assistance from two local DTA offices. MPR examined the documentation of regular attendance to determine the frequency and regularity with which teen specialists monitored the school attendance of their clients. This review had considerable limitations. In particular, when attendance documentation was missing for a particular month, reviewers could not be certain whether the teenage parent provided no verification of regular attendance, whether formal verification was provided but the form was misfiled, or whether verification occurred in some informal fashion (such as through a telephone call). Nevertheless, results of the review are informative.

Among teenage parents who had no diploma or GED certificate, the large majority of these files contained some evidence of formal attendance monitoring (such as a completed monthly attendance form or other written verification from the school or program) over the 12-month follow-up period for the case file review. However, many case files that contained evidence of monitoring had several months for which no form was present, even though no sanction was imposed and the teenage parent did not yet have a diploma or GED. Missing forms were particularly common among teenage parents who attended high schools. Materials from these files suggest that monitoring for teenage parents attending high schools was often done less often than monthly (in some cases, only at application and recertification).

In addition, teenage parents who attended GED programs often had missing forms. Materials from these files suggest that in many of these cases, attendance was not monitored because the teenage parent was on a waiting list for a GED program or was still in the application process (for example, waiting for GED program pretest results). In other cases, teenage parents were waiting to take the GED test or waiting for test results. In some cases in which there was no evidence of attendance monitoring, notes in the file indicated that the teenager had passed parts of the GED test and was waiting to retake the parts she did not pass. In some cases involving GED enrollees, periods in which no attendance monitoring took place for these reasons appeared to last several months.

In several cases in which forms were missing but no sanction was imposed, it appeared that the three-month exemption from the attendance requirement after the birth of a child may have been extended a few months. This extension appeared particularly common when the three-month exemption period expired near the end of the school year (in April or May).

5. Enforcement of the Attendance Requirement

Two stages of sanctions can be imposed on teenage parents for violation of the attendance requirement. A teenage parent receiving a first-stage sanction, imposed for the first month of noncompliance, has her needs removed from the cash grant. For a teenage parent who heads her own case, has one child, and has no other income, a first-stage sanction would reduce her grant by \$91, from \$474 to \$383. A first-stage sanction would also result in a \$91 grant reduction for a teenage parent who heads her own case and has two children and for a teenage parent with one child on her mother's cash assistance case, assuming they have no other income.

If a teenage parent remains out of compliance with the attendance requirement for 30 days after a first-stage sanction, a second-stage sanction is imposed. A teenage parent receiving a second-stage sanction has both her needs and those of her child or children removed from the cash grant. For a teenage parent who heads her own case, a second-stage sanction results in elimination of her entire cash grant. She continues to receive Medicaid and Food Stamps, however. For a teenage parent who is on someone else's cash assistance case, the case remains open, but the grant is substantially reduced. For example, in a case consisting of a teenage parent, her mother, and her baby, the grant would be reduced from \$565 to \$383, a reduction of \$182. For all cases containing a teenage parent, the full cash benefit is reinstated as soon as the teenage parent can prove she is regularly attending a school or GED program.

Data from the two local DTA offices visited for this study suggest that sanctions for poor school attendance are imposed with considerable frequency. For example, among teenage parents receiving cash assistance in the early months of 1996 in these two offices, 22 percent received a first-stage sanction and 19 percent received a second-stage sanction during the subsequent 12 months (see Table C.2).⁽⁵⁾ Moreover, among this sample, all but one of those who received a second-stage sanction during this 12-month period headed their own cases when they were sanctioned. Therefore, in virtually all these cases, the cash grant was eliminated. However, many cases that are closed for poor attendance reopen within a short time. For example, among those having their cash grants eliminated for poor attendance during the first eight months of the follow-up period, over half (54 percent) had their grants restored within six months.

6. Barriers to Compliance with the School Attendance Requirement

According to welfare staff, a lack of family support and unstable home environments impede

regular attendance for many teenage parents. The director of one local DTA office serving a large number of teenage parents attributed their resistance to school attendance to a low emphasis on education in the households in which they were raised. Similarly, a teen specialist in another office mentioned lack of support from family members as an important barrier to school attendance facing many teenage parents. Several local staff members mentioned chaotic living situations and housing problems as a major barrier. One local director cited the results of an ongoing DTA-sponsored inspection of all households of cash assistance cases headed by teenage parents to make this point. She said that inspectors had found a surprising number of extremely poor living conditions, including mattresses on the floor and no cribs for the baby. She thought that a teenager living in this environment would find it difficult to make it to school on time every day. Several people reported that, for many teenage parents, unstable housing situations--particularly, frequent moves and periods of homelessness--were another obstacle to regular school attendance.

TABLE C.2

ATTENDANCE SANCTIONS FOR TEENAGE PARENTS RECEIVING CASH ASSISTANCE IN
JANUARY OR FEBRUARY 1996 IN TWO LOCAL WELFARE OFFICES

| | |
|--|------------|
| Percentage Receiving First-Stage Sanction Within | |
| 3 Months | 9 |
| 6 Months | 14 |
| 9 Months | 18 |
| 12 Months | 22 |
| 14 Months | 24 |
| Percentage Receiving Second-Stage Sanction Within | |
| 3 Months | 5 |
| 6 Months | 11 |
| 9 Months | 14 |
| 12 Months | 19 |
| 14 Months | 20 |
| Among Those Receiving Second-Stage Sanction Within 8 Months (N=26), Percentage Having Cash Grant Restored Within | |
| 3 Months | 27 |
| 6 Months | 54 |
| Sample Size | 194 |

Source: Massachusetts Department of Transitional Assistance (DTA) automated data.

Note: The sample represents all teenage parents who received cash assistance in January or February 1996 in the two local DTA offices included in the study and who were 18 years old or younger at the beginning of the follow-up period.

State and local DTA staff members said that adequate child care funding exists for teenage parents receiving cash assistance, and that a lack of such funds should not prevent any teenage parents from meeting the attendance requirement. However, teen specialists reported that many of the teenage parents they serve are reluctant to put their children in day care. According to these staff members, some teenage parents have heard reports in the media of child abuse and neglect in day care facilities and have concluded that none of these facilities are safe. Some teenage parents are especially reluctant to place children only a few months old in day care.

Others interviewed for the study described other child care issues concerning teenage parents. For example, an administrator of a GED program serving many young parents complained of encountering a problem in which teenage parents who have poor attendance for one month immediately lose their child care assistance. In these instances, a teenage parent can lose her spot at a desirable day care facility, which could impede her return to school.

Several DTA staff members, as well as others who work closely with teenage parents, pointed out that children of teenage parents tend to have more health problems than other infants. Since day care providers typically do not accept sick children, it is fairly common for teenage parents to be absent from school for extended periods while caring for a seriously ill child.⁽⁶⁾ Others reported that teenage parents prefer family day care over day care centers and that family day care tends to be less reliable than center care. For example, it may be unavailable temporarily if the provider is sick or has a personal emergency or permanently if the provider decides to pursue another occupation.

DTA staff members and others interviewed for the study cited other reasons that some teenage parents fail to comply with the school attendance requirement. For example, DTA staff members at both the state and local levels reported that in many cases teenage parents simply do not want to attend school or to be away from their small children. Several staff members thought teenage parents who have been out of school for a few years are particularly resistant to school attendance. In addition, an administrator of a GED program serving large numbers of teenage parents reported that low self-esteem and depression are common among this population. She considered mental health problems an important reason why some teenage parents fail to attend school regularly.

7. Alternative Education Programs

Many teenage parents prefer GED programs over high schools. The review of 164 case files conducted for this study revealed that, among teenage parents who had already earned a degree, about the same number had GED certificates as had high school diplomas. Moreover, among those still pursuing a degree, a larger number were attending GED programs than were attending high schools. A GED program administrator interviewed for the study said that teenage parents, many of whom are substantially behind grade level, often preferred GED programs to high school because it was a much faster method of obtaining a degree.

State-level DTA officials reported that when the attendance requirement was first imposed, there was a shortage of alternative education programs for teenage parents. However, this shortage of GED programs has become much less severe in recent months. Most local DTA staff reported that currently there are no major problems with the supply of GED programs available to teenage parents.

One reason that the supply of GED slots for teenage parents appears to be adequate may be the Young Parents Program (YPP), an alternative education program funded by DTA for young parents (age 14 to 21) receiving cash assistance. DTA contracts with local community-based organizations that operate programs in 28 locations throughout Massachusetts. The program now serves about 1,100 young parents, a large majority of whom are teenagers. In early 1997, approximately 20 percent of teenage parents receiving cash assistance statewide were enrolled in a YPP-sponsored GED program.

Programs must meet a minimum of 20 hours per week and must offer at least 12 hours of educational activities and at least 5 hours of life skills training. Educational activities include GED preparation classes, remedial adult basic education classes, and job readiness and job skills classes (such as computer literacy). Life skills classes cover such topics as the health and nutrition of the young mother and her child, child development, good parenting skills, and family planning. Programs funded through YPP also offer counseling and case management. Most young parents (about 70 percent) spend less than a year in the program, although some (less than 10 percent) spend two years or more. Median length of stay in the program is about nine months.

DTA currently devotes almost \$3 million annually to YPP, \$2,635 per young parent served. There has been a substantial increase in enrollment in YPP since Welfare Reform '95 was implemented in November 1995, from about 900 in July 1995 to about 1,100 in January 1997. The manager of the statewide program attributes this rise to welfare reform and the new school-attendance requirements.

E. IMPLEMENTATION OF THE LIVING ARRANGEMENT REQUIREMENT

1. Role of Child Welfare Authorities

DTA coordinates closely with the Department of Social Services (DSS), the state agency that handles child welfare issues, in monitoring the living arrangements of minor parents. Whenever a minor parent receiving or applying for cash assistance claims that she has no adult relative to live with, DTA refers the case to DSS, which conducts an investigation. As part of this investigation, a social worker talks with the minor parent about her living situation and attempts to contact family members to determine whether there are any relatives who could accommodate the minor parent. Based on this investigation, DSS rates the minor as high, medium, or low priority for the Teen Living Program. DTA places teenage parents in the program based on the DSS rating, as well as the availability of slots. On rare occasions, DSS recommends that the minor parent move back with her parents in spite of the minor's objections.

2. Exemptions from the Living Arrangement Requirement

DTA has specified some extremely limited situations in which a minor parent can live independently--in other words, not with an adult relative or in a state-sponsored group home for teenage parents. To live independently, the minor parent must (1) be 17 years old, (2) attend school regularly or already possess a high school diploma or GED, and (3) be ruled by DSS as a low priority for the Teen Living Program. Only five cases were granted this exemption during the first 15 months the requirement was in effect. In early 1997, according to DTA officials, no minor parents receiving cash assistance in Massachusetts had permission to live independently.

3. Monitoring Living Arrangements

Compliance with the living arrangement requirement is verified at application and at recertification, which occurs about every six months. Unmarried minor parents who head their own cash assistance cases must have their landlord and the primary tenant on the lease complete a form verifying that the minor lives where she claims. She must also provide proof of relationship to the primary tenant, typically with a birth certificate. Verification of living arrangements is also required whenever a minor parent case head reports a change of address. In the spring of 1997, teen specialists began conducting mandatory annual home visits for all teenage parents receiving cash assistance. These visits will serve as an additional means of monitoring compliance with the living arrangement requirement.

Monitoring compliance with the living arrangement requirement is a fairly small burden on the time of teen specialists, because (1) it is not done for many cases, and (2) it is not done often (typically only at application and recertification). Although teen specialists have caseloads of 65 to 80, the 4 interviewed for the study reported each having only 4 or 5 unmarried minor parent case heads on their caseloads. Since it is assumed that minor parents on someone else's grant are in compliance with the requirement, teen specialists need to monitor the living arrangements of only a small fraction of their total caseload.

4. Enforcement of the Living Arrangement Requirement

An unmarried minor parent who does not comply with the living arrangement requirement will have her cash assistance case closed, though she will continue to receive food stamps and Medicaid. Closings for violation of the living arrangement requirement appear to occur infrequently. According to DTA records, in February 1997, only 10 cases statewide were closed because of violation of the living arrangement requirement. DTA was not able to provide statewide information on how many minor parent cases had ever been closed for this reason, so there may have been some additional closed cases that later reopened. However, neither local DTA office visited for the study had closed a case for violation of the living arrangement requirement during the first 16 months it was in effect.

DTA officials did not know how many minor parents had been denied cash assistance at application because of the requirement. Moreover, no data exist on how many minor parents would have applied for cash assistance but did not because they were aware of the living arrangement requirement and did not want to comply with it. Therefore, it is not possible to say how many minor parents in Massachusetts are not receiving cash assistance because of the requirement.

5. The Teen Living Program

As part of Welfare Reform '95, the State of Massachusetts created the Teen Living Program. Through the program, the state has committed \$5 million annually to fund group homes for teenage parents who receive cash assistance and cannot live with an adult relative. Statewide, this funding provides more than 100 slots for teenage parents and their children. The average annual cost of the program's housing and other services is about \$45,000 per participating teenage parent. In May 1997, 22 group homes sponsored by the Teen Living Program were operating statewide, providing 110 permanent slots and 10 additional emergency slots. At that time, 91 teenage parents resided in group homes sponsored by the program (87 in permanent slots and 4 in emergency slots). This number represents about two percent of teenage parents receiving cash assistance statewide.

Community-based organizations operate the group homes under contract with DSS. Most of these facilities began after Welfare Reform '95 was implemented, although some predate welfare reform. To be eligible for the Teen Living Program, a teenage parent must receive cash assistance, and a DSS investigation must conclude that she has no adult relative to live with. Teenage parents must contribute one-third of their cash assistance check each month to help cover the cost of the program.

Two basic models of group homes are funded through the Teen Living Program, the congregate model and the apartment model. In the congregate model, several teenage mothers and their children live in a single-family home. Residents prepare meals together and

share responsibilities for chores. In the apartment model, the group "home" consists of a cluster of apartments. Residents prepare their own meals and are responsible for their own cleaning and chores. However, they are required to keep their unit clean or they can lose visitor and other privileges. In both models, on-site counseling for problems and crises is available, and a program staff member is on site 24 hours a day, seven days a week. Many group homes do not provide child care on site. Instead, residents use a variety of off-site child care providers. Other group homes are affiliated with a particular child care provider that may offer child care in the same location as the group home.

Group homes impose significant requirements and restrictions on residents. As a condition of residence, teenage parents in group homes sponsored by the Teen Living Program must attend an education or job training activity for a minimum of 20 hours each week. They must also participate each week in several hours of parenting and life skills activities, such as supervised play with their children or discussions about money management. Group home residents must help with household chores, such as cooking and cleaning. In addition, the group homes impose curfews and restrictions on the hours residents can have visitors. Drinking, drugs, and overnight guests are not allowed.

Group homes offer substantial advantages for some teenage parents. The director of one group home interviewed for the study reported several advantages for teenage parents living in this type of facility. Most important, unlike many teenage parents, residents are not isolated and have the support they need. Moreover, the group homes provide a structure that makes it easier for residents to attend school regularly. In addition, they provide environments that are better for the infants than many other living arrangements available to the teenage parents. Finally, the director reported that the housing options facing the teenage parents she served were bleak, that most of them would be homeless if it were not for the program.

Despite these advantages, however, a substantial number of vacant slots remain. In February 1997, 30 of the 106 Teen Living Program slots statewide were vacant. The director of one local DTA office suggested that these vacancies were evidence that many teenage parents did not find group homes very attractive. She reported that few teenage parents in her office were willing to accept this type of housing. She thought that most teenage parents she encountered found the program's curfews and its restrictions on visitors and other activities unappealing. By May 1997, the vacancy rate for the group homes had dropped somewhat (23 of 110 slots), but it remained over 20 percent. State DTA officials reported that in a few instances these openings represent planned vacancies, in which a slot is being held for a particular teenage parent. In any case, the persistence of vacancies suggests that the Teen Living Program is more than meeting the demand for group homes among teenage parents on cash assistance in Massachusetts.

6. Living Arrangements of Teenage Parents Receiving Cash Assistance

According to DTA computer tracking system data from the two local offices visited for the study, most teenage parents receiving cash assistance live with their parents (Table C.3). Even among 18- and 19-year-old parents (who are not subject to the living arrangement requirement) most live with a parent. A substantial fraction of teenage parents who do not live with their parents live with another adult relative. Among the teenage parents in these two local offices, 68 percent lived with a parent or other adult relative. This proportion ranged from 85 percent among minor parents to 60 percent among 19-year-old parents.

TABLE C.3

CHARACTERISTICS OF TEENAGE PARENTS RECEIVING CASH ASSISTANCE IN FEBRUARY 1997 IN TWO LOCAL WELFARE OFFICES (Percentage)

| | Teenage Parents Who Are: | | | All Teenage Parents |
|------------------------------------|--------------------------|--------------|--------------|---------------------|
| | Less than 18 Years Old | 18 Years Old | 19 Years Old | |
| Living Arrangements | | | | |
| Living with a parent | 60 | 56 | 52 | 54 |
| Living with another adult relative | 25 | 19 | 8 | 14 |
| Living in a TLP group home | 13 | 3 | 1 | 3 |
| Living independently | 2 | 22 | 38 | 29 |
| Heads Own Cash Assistance Case | 42 | 97 | 100 | 90 |
| Ever Married | 0 | 0 | 3 | 2 |
| Female | 100 | 99 | 100 | 100 |
| Ethnicity | | | | |
| African American | 35 | 35 | 36 | 35 |
| Hispanic | 51 | 57 | 52 | 54 |
| White | 12 | 8 | 12 | 11 |
| Other | 2 | 0 | 0 | 0 |
| Sample Size | 49 | 98 | 174 | 321 |

Source: Massachusetts Department of Transitional Assistance (DTA) automated data.

Note: The sample represents all teenage parents receiving cash assistance in February 1997 in

the two local DTA offices included in the study.

TLP = Teen Living Program.

1. TA provided statewide figures only for the number of teenage parents who head their own cash assistance cases; the agency did not provide statewide figures on the number of teenage parents on someone else's cash assistance case. DTA did, however, provide data on the number of teenage parents on someone else's grant from the two local DTA offices visited for the study (which serve about seven percent of the teenage parents in the state). Therefore, statewide, the number of teenage parents on someone else's grant was estimated using the number from these two offices and assuming that the proportion of teenage parents who are on someone else's grant was the same statewide as it was in these two offices.
2. State DTA officials report that this problem with the central computer system was fixed in the months following our site visit, and now local offices can print out lists of embedded teenage parents.
3. In these instances, the entire case is transferred to a teen specialist, who is then responsible for working with the case head as well as the teenage parent.
4. Massachusetts issues cash assistance checks twice each month.
5. This analysis is restricted to teenage parents who were 18 or younger at the beginning of the follow-up period and therefore were subject to the attendance requirement for the subsequent 12 months.
6. In this case, as long as she has written verification from a doctor, a teenage parent would receive a good-cause exemption from the attendance requirement.

Implementing Welfare Reform Requirements for Teenage Parents: Lessons from Experience in Four States

APPENDIX D CASE STUDY OF VIRGINIA

The Virginia Independence Program (VIP), the state's welfare reform initiative implemented in July 1995, imposed two new requirements of particular significance to young parents receiving cash assistance. First, all school-age minors receiving cash assistance (including those who are not parents) must comply with the state's compulsory education laws. Those who do not can have their cash grants reduced. Second, unmarried minor custodial parents receiving cash assistance must live with a parent or with another adult standing "in loco parentis" (in place of the parent). Minor parents who do not comply can have their cash assistance cases closed or their applications for cash assistance denied.

A. OVERVIEW OF THE NEW REQUIREMENTS

1. School Attendance Requirement (Learnfare)

Specific Requirement. As part of VIP, Virginia imposed a statewide school attendance requirement (known as Learnfare) for all school-age children (age 5 to 17) receiving cash assistance. Minors can fulfill the Learnfare requirement through attendance at a public or private school, home school, or GED program. To meet the Learnfare requirement, school-age minors must comply with the state compulsory education laws and must not be considered truant by the local school district.

Monitoring and Enforcement. Compliance with Learnfare is monitored monthly. Each month, the Virginia Department of Social Services (DSS), the agency that administers the state's cash assistance program, provides each of Virginia's 134 school districts with the list of children in their district subject to Learnfare. Districts are then supposed to match the list of names to their enrollment and attendance records and report to the local DSS office the children who are either not enrolled or enrolled but considered truant. Local agencies are also responsible for developing their own procedures for monitoring the attendance of students in private schools and GED programs.

According to DSS procedures, caseworkers are to notify clients if a child on their grant has been identified by the school district as truant. Clients have an opportunity to explain the reason for their child's absence before any sanction is imposed. They are asked to schedule an appointment with their caseworker to develop a plan for returning their child to school. If the

parent or other caretaker complies with this plan, the case will not be sanctioned. However, if the parent fails to comply with the plan or fails to come into the welfare office to develop an attendance plan, the cash grant is reduced by the child's portion of the grant. This sanction averages about \$60 per month. DSS allows local agencies to determine the specific schedule for attendance monitoring and enforcement.

2. Minor Parent Living Arrangement Requirement

Specific Requirements. As part of VIP, unmarried custodial parents under age 18 are required to live with a parent or with another adult at least 21 years old serving in loco parentis. The adult does not have to be a relative, but the welfare caseworker must consider the adult able to function as a parent for the minor. The state has left it up to local DSS agencies to establish their own guidelines for when an adult can serve in loco parentis. The central DSS office has, however, instructed local agencies that adult boyfriends of minor parents are not acceptable guardians.

The state legislation that created the living arrangement requirement allows two exemptions for unmarried minor parents. First, a minor without a living parent or guardian who can be located is exempt. Second, if the local DSS agency determines that the minor parent's physical or emotional well-being would be jeopardized by compliance with the requirement, the minor parent is exempt. Under procedures established by DSS, this latter exemption requires corroboration, such as a court order, a report from child welfare authorities, or medical records. Under state law, if one of these exemptions exist, the local agency must assist the minor parent in locating an adult-supervised living arrangement.

Monitoring and Enforcement. An unmarried minor parent who heads her own cash assistance case must provide proof of compliance with the living arrangement requirement when she applies for assistance, and then every six months at recertification. Local DSS offices first look for verification of a minor parent's living arrangement through school district records, which typically provide an address and a name of a parent or guardian. Local agencies also use housing authority records for verification when a minor parent claims to live in public housing with her parent or guardian. If the welfare office is unable to verify the minor parent's living arrangement using one of these methods, either a copy of a lease or a letter from the landlord or a neighbor is sufficient proof. If a minor parent does not comply with the living arrangement requirement, state law requires DSS to close her case or deny her application for cash assistance. She continues to be eligible for food stamps and Medicaid.

3. Reorganization Resulting from the New Requirements

The new attendance and living arrangement requirements imposed under VIP did not involve substantial reorganization of DSS programs or responsibilities. As before, teenage parents, as well as other cash assistance cases containing school-age minors, are handled by regular

caseworkers who handle all types of cash assistance cases. These caseworkers are responsible for enforcing compliance with Learnfare and for monitoring the living arrangements of minor parents. VIP did not create additional support services as part of the new attendance and living arrangement requirements. Since no special services for Learnfare cases or for teenage parents receiving cash assistance were established, there has been little perceived need for substantial reorganization associated with the new requirements.

B IDENTIFYING MINOR PARENTS RECEIVING CASH ASSISTANCE

Since it was put into place in the 1970s, DSS's central computer system for tracking cash assistance cases has contained a field to allow intake workers and caseworkers to flag minor parents on someone else's cash grant. However, staff in local offices do not consistently use this flag. In January 1997, the system identified 203 minor parents on cash assistance: 116 minor parents who headed their own cases and 87 on someone else's grant. Senior DSS officials acknowledge that this figure seriously undercounts the number of minor parents who receive cash assistance on someone else's grant. DDS estimates that, in January 1997, 265 minor parents were on cash assistance cases but were not identified as minor parents in their computer system, for a total of 468 minor parents receiving cash assistance in the state (see Table D.1). DSS identified these additional "likely" minor parents by searching for cash assistance cases that contained both a grandchild and a minor daughter of the case head and where the minor daughter was at least 13 years older than the grandchild.⁽¹⁾ Based on these estimates, less than one percent of cash assistance cases statewide contain a minor parent.

Based on its current policies, DSS can enforce its living arrangement and school attendance requirement without identifying minor parents who receive cash assistance on someone else's grant. For example, it is not necessary to identify minor parents on an adult relative's case to enforce the living arrangement requirement, since only the living arrangements of minor parents who head their own cash assistance cases are monitored. (As in other states, those on someone else's case are assumed to be in compliance.)

TABLE D.1

NUMBER OF CASH ASSISTANCE CASES AND NUMBER OF MINOR PARENTS RECEIVING CASH ASSISTANCE JULY 1995 THROUGH JANUARY 1997

| | Number of Cash Assistance Cases | Number of Minor Parents | | |
|-----------|---------------------------------|---|--|---------------------------|
| | | Who Head Their Own Cash Assistance Case | On Someone Else's Cash Assistance Case | Receiving Cash Assistance |
| July 1995 | 68,462 | 125 | 368 | 493 |

| | | | | |
|--------------|--------|-----|-----|-----|
| January 1996 | 65,371 | 148 | 425 | 573 |
| July 1996 | 61,388 | 114 | 397 | 511 |
| January 1997 | 55,498 | 116 | 352 | 468 |

Source: Virginia Department of Social Services estimates.

Similarly, because Learnfare applies to all school-age minors (not just minor parents) and because DSS offers no services specifically for teenage parents, the agency does not need to identify minor parents for these reasons. It is not surprising, therefore, that DSS's identification of minor parents in its computer system is incomplete.

C. IMPLEMENTATION OF THE LEARNFARE ATTENDANCE REQUIREMENT

1. The Planning Phase

Getting Learnfare off the ground was a major effort, according to state-level DSS staff members. One senior DSS official said of Learnfare, "This was the hardest part of welfare reform." In preparation for implementation of the new attendance policy in September 1995, DSS began coordinating with the Virginia Department of Education (DOE) during the spring and summer of 1995. While DSS was working with DOE during this planning phase, two problems arose.

First, the legislation creating Learnfare required sanctioning of cash assistance cases containing a "truant" child. However, while writing the new regulations, DSS learned that school districts across the state did not use a standard definition of truancy. Therefore, the agency developed an attendance standard of its own. In its original form, this standard defined truancy as (1) 10 or more unexcused absences in a month, or (2) 8 or more unexcused absences in each of two consecutive months.

The second problem DSS encountered during the planning phase was the very limited control DOE could exert over local school districts. As in most states, Virginia has a strong tradition of local control of education. Therefore, the ability of DSS to coordinate implementation of Learnfare at the state level through DOE turned out to be very limited. Instead, DSS and its local agencies had to coordinate with each of Virginia's 134 school districts. This required DSS staff to spend more time than had been anticipated preparing training materials for local districts and addressing their questions about Learnfare procedures.

In September 1995, DSS sent written materials to all of Virginia's school districts, explaining the attendance information DSS needed from schools and the procedures for providing DSS

the information. In October 1995, DSS and DOE conducted an audio conference presentation and a question-and-answer session covering Learnfare for staff members from schools and local DSS offices.

2. Changes to Learnfare During Initial Implementation

Local DSS agencies believed the original attendance standard, which allowed as many nine unexcused absences in a month before a child was considered truant, to be too lenient; so did many state legislators. In addition, many school districts did not distinguish between excused and unexcused absences and, thus, were unable to track the number of unexcused absences, as required by the original attendance standard. In response to these concerns and problems, DSS amended the Learnfare regulations in early 1996, redefining truancy as consistent with the state's compulsory school attendance laws. At the same time, the Virginia General Assembly passed legislation that amended these laws, setting a stricter attendance standard for all students (not just those receiving cash assistance). Both the new Learnfare regulations and the new compulsory attendance legislation went into effect July 1, 1996.

Under the 1996 compulsory attendance legislation, schools are required to attempt to contact the parent of any frequently absent child to determine the reason for the absences. The legislation defines students as "frequently absent" if they have (1) three consecutive absences, (2) five absences within a month, or (3) seven absences within a calendar quarter. If the parent or guardian has not contacted the school regarding the absences, and has failed to respond to a written request for an explanation of the absences within three days of the date of the notice, the law specifies that the child be considered truant. Unlike the original Learnfare standard, the new truancy policy does not require schools to track the specific number of unexcused absences. Instead, schools are to identify frequently absent students and then investigate the reason for these absences.

During the first few months of the Learnfare requirement, DSS mailed each of Virginia's 134 school districts a computer disk containing a list of all school-age children receiving AFDC in their district. Within a few months, however, it became clear that this method was too time-consuming and costly. As an alternative, in January 1996, DSS established a computer bulletin board where the agency posts the lists of Learnfare children for each of the state's school districts. Using a modem and a toll-free number, a district can access the bulletin board, but only for the Learnfare students in its own schools. Many smaller school districts do not use this automated system; instead, they find it simpler to get the relatively short list of Learnfare students for their districts directly from the local DSS agency.

3. The Attendance Monitoring Process

DSS procedures specify that school districts are to match the list of Learnfare students with their attendance records and report to the local DSS agency students who are either not

enrolled or enrolled but considered truant. Attendance monitoring for students in the public school system takes place on a monthly basis. The state has not set a specific timetable for how quickly attendance information must be received from schools by local DSS agencies. Development of a specific schedule for attendance monitoring is left up to local agencies and school districts.

As discussed earlier, DSS refined the Learnfare truancy definition at the local level. However, based on discussions with staff members from one of the largest local DSS agencies (serving almost 10 percent of the statewide caseload), it appears that some confusion remains over the definition of truancy under Learnfare.

Caseworkers from one large local DSS agency, serving almost 5,000 cash assistance cases, reported that they spend substantial time following up on the hundreds of potential truants reported by the local school district. Each month, the local school district sends the welfare agency a list of about 400 truants. Upon investigation, however, DSS caseworkers often discover that many of these "truants" are actually students who have moved or enrolled in private school. The rest (as many as 300, in some months) typically are students who were out sick and are already back in school.⁽²⁾ State DSS staff indicated that, based on state-level policy, local districts should not report as truant students who are out sick for only a few days. The large number of students reported by this school district as truant each month suggests that the district may have misunderstood DSS's definition of truancy. Furthermore, it appears that this misunderstanding has placed a significant burden on staff time for this local DSS agency.

In spite of these difficulties, staff in this local DSS agency reported an unexpected benefit of exchanging information with the local school district. A report to DSS by a local school district that a Learnfare student is not enrolled often indicates that the minor no longer resides in the area and therefore should not be receiving cash assistance from the local DSS agency. Local staff indicated that several cases of fraud had been uncovered through these computer matches with the local school district.

Learnfare required local welfare agencies and school districts to work together, something rarely done in the past. Establishing working relationships posed substantial challenges. For example, state DSS officials reported that some school districts were initially resistant to monitoring compliance with Learnfare. According to DSS staff, some districts felt that they were not involved with developing policy and therefore should not be required to help enforce it. Many districts considered having to provide the local welfare agency a monthly list of truants a major burden because of staffing limitations, as well as initial confusion over the truancy definition. According to state DSS staff, however, this latter concern is no longer a major issue, because of the revisions to the truancy definition made in 1996. In addition, district staff have become more comfortable and familiar with the reporting procedures.

State DSS officials also reported problems associated with school districts' limited computer experience. Many districts had difficulty dialing into the state's computer system to retrieve the list of Learnfare students. This usually occurred in districts without the appropriate equipment or software, or where the staff members assigned to retrieve the data were inexperienced with computers. These problems have diminished substantially as districts have learned the procedures and acquired the necessary equipment. DSS's central office provides ongoing technical support to assist local school districts with retrieving lists of Learnfare students from their computer bulletin board.

According to state DSS staff, some local agencies experienced problems exchanging information with districts because the districts did not have students' social security numbers. In other localities, schools were reluctant to report students with poor attendance records because of concerns over violating students' right to confidentiality. According to state welfare officials, confidentiality concerns regarding Learnfare were resolved by the state's attorney general's office, which concluded that reporting truancy to the local DSS agency was not a violation of a student's right to confidentiality.

With few exceptions, school district boundaries in Virginia are county- or city-wide, as are the boundaries for local DSS agencies. For this reason, in almost every instance, local DSS agencies deal with only one school district, and school districts deal with only one DSS agency when monitoring school attendance. This correspondence of school district and DSS agency boundaries along county and city borders greatly simplifies interaction between schools and local welfare offices concerning Learnfare. In other states, where each county is divided into numerous school districts, the necessary interaction between schools and local welfare agencies to enforce a broad attendance requirement may be substantially more complicated.

DSS policy requires local agencies to develop procedures for monitoring the attendance of students enrolled in private schools and GED programs. Staff in the local DSS agency visited for the study estimated that about five percent of their Learnfare students were in education programs outside the public school system. Caseworkers from this agency reported that they monitor the attendance of the few students attending private schools by contacting the schools directly. One caseworker said that she checks attendance of her private school students every six months, at recertification, as well as additional times, "when I think of it." Caseworkers reported that they monitor the attendance of Learnfare students in GED programs, using monthly attendance forms completed by the GED instructor.

4. Enforcement of the Learnfare Requirement

Under DSS policy, when a child is reported by the school district as truant, the caseworker is to attempt to schedule an appointment with the case head to develop an attendance plan for returning the child to school. As part of establishing this plan, the caseworker must determine the reasons for the child's frequent absences. According to state-level policy, this attendance

plan should specify the actions that constitute compliance, as well as a time frame for achieving compliance. State policy requires that whenever a child is reported as truant, a plan must be developed and signed by both the case head and the caseworker.

Local practice does not appear to be entirely consistent with this state-level policy. For example, the three caseworkers interviewed for this study indicated that, in a typical month, the local school district reports as truant four to eight children on each of their caseloads. Nonetheless, all three caseworkers reported that, during the first 18 months of the Learnfare policy, they had never worked with a client to develop an official plan for returning a child to school. According to these workers, in most cases, they simply telephone the case head to determine the reason for the child's absences. If the parent or guardian reports that the child has been out sick (as is the case for the large majority of those reported as truant), the caseworkers said they typically do not require the client to come into the welfare office to develop a plan to address the attendance problem, nor do they require verification of the illness from a doctor. However, the caseworkers reported that they could demand verification of the illness if they became suspicious of repeated absences, but that it was up to them to decide when to impose a stricter standard.

If a parent or guardian fails to comply with the plan developed by the caseworker for addressing the truancy problem, or if he or she fails to come into the welfare office to develop a plan, the case can be sanctioned. If a case is sanctioned, the needs of the child with poor attendance are removed from the grant. The actual size of the grant reduction resulting from a Learnfare sanction depends on the composition of the cash assistance case; however, it averages about \$60 per month. Some DSS staff expressed skepticism that this small grant reduction would have a substantial impact on the school attendance of many children receiving cash assistance.

Most sanctions are imposed because parents fail to respond to the initial notice of a truancy problem. For example, the three caseworkers interviewed for the study, whose combined caseloads contained about 200 children in Learnfare, reported that, among them, they had imposed four Learnfare sanctions during the first 18 months of the policy. In all four sanction cases, the parents had failed to respond to the caseworkers' attempts to contact them concerning the report that their child was truant. Similarly, state-level data indicate that, during the first six months of the policy, 75 percent of Learnfare sanctions were imposed because the parent or guardian failed to respond to the initial notice that the child had been reported as truant. The remaining 25 percent were sanctioned for failing to comply with the attendance plan developed by their caseworker to address a child's truancy problem.

Learnfare sanctions are imposed infrequently. Based on figures provided by DSS, less than one percent of the more than 100,000 school-age children on cash assistance in Virginia received a sanction during the 1995-1996 school year. A major reason for the low overall rate of Learnfare sanction is the fact that most Learnfare children are in elementary school and, thus, are at an age when chronic absenteeism is rarely a problem. Presumably, the Learnfare

sanction rate among teenagers is substantially higher than the overall sanction rate; however, sanction rates for teenagers were not readily available from the state.⁽³⁾

The state did, however, provide Learnfare sanction data specific to minor parents. These data indicate that minor parents are sanctioned much more frequently than other Learnfare cases. Among minor parents who received cash assistance in Virginia during the first quarter of 1996, 11 percent received a sanction during the 12-month period January to December 1996 (Table D.2).⁽⁴⁾

TABLE D.2

LEARNFARE SANCTIONS FOR MINOR PARENTS RECEIVING CASH ASSISTANCE IN THE FIRST QUARTER OF 1996 (Percentage)

| | Minor Parents Who Are: | | | All Minor Parents |
|-------------------------------------|-------------------------------------|---------------------------|---------------------------|-------------------|
| | Less than 16 Years Old ^a | 16 Years Old ^a | 17 Years Old ^a | |
| Received Learnfare Sanction Within: | | | | |
| 3 months | 3 | 3 | 3 | 3 |
| 6 months | 6 | 10 | 8 | 8 |
| 9 months | 7 | 11 | 9 | 9 |
| 12 months | 7 | 15 | 11 | 11 |
| 15 months | 8 | 18 | 12 | 13 |
| Sample Size | 98 | 166 | 339 | 603 |

Source: Virginia Department of Social Services automated data.

Note: The sample represents all minor parents who received cash assistance in Virginia during January, February, or March 1996 and who were younger than 18 on July 1, 1996.

^a Age as of July 1, 1996.

One important, possible explanation for the low overall sanction rate is the "cooperation" exemption from Learnfare sanctioning. When the parent cooperates with the local DSS agency in trying to return a truant child to school, the case can be exempt from sanctioning. Localities have wide flexibility in deciding what constitutes cooperation with the welfare office. This flexibility in interpreting "cooperation" may explain, at least in part, why some local agencies rarely imposed Learnfare sanctions during the first year of the requirement. For example, during the 1995-1996 school year, three of the largest local DSS agencies had Learnfare

sanction rates of less than 0.2 percent, while other large agencies sanctioned Learnfare cases at 7 to 10 times that rate. One large agency, serving more than 2,000 Learnfare students, imposed no sanctions during the first year the policy was in effect.

Another important reason why Learnfare sanction rates are low may be that Virginia does not encourage frequent use of sanctions by local DSS agencies. For example, a passage from a DSS report from February 1996 reads:

As written, the [Learnfare] requirement is a preventative measure, with penalties instituted only as a last resort when there is noncooperation in working toward achieving compliance with school attendance laws. As long as the family follows the plan developed by the local department of social services and the parent or other caretaker/relative, the child remains eligible for AFDC benefits during the intervention period (DSS 1996).

The number of Learnfare sanctions has increased somewhat during the second year of the policy. According to DSS figures, between July 1995 and December 1995, 218 school-age minors were sanctioned for failure to attend school. During the same six-month period in 1996, 305 school-age minors were sanctioned, a 40 percent increase. Moreover, the cash assistance caseload in Virginia fell over this period by about 15 percent (see Table D.1). These trends suggest that Learnfare sanction rates may have increased by as much as two-thirds from the first to the second year of the policy. However, even with the increase in the sanction rate, the proportion of school-age minors on cash assistance who received a sanction during the 1996-1997 school year most likely remained quite low, probably between one and two percent.⁽⁵⁾

There are several possible explanations for an increase in the Learnfare sanction rate over this period. For example, a lenient attendance standard was in place during the 1995-1996 school year. Sanction rates may have risen, in part, because DSS imposed a stricter standard, beginning with the 1996-1997 school year. In addition, during the first year of the policy, local agencies were still working out systems of getting attendance information from school districts. As these systems improved, sanction rates may have increased.

5. Barriers to Compliance with Learnfare

Staff members in the local DSS agency visited for the study reported several reasons that some school-age minors fail to comply with the Learnfare attendance requirement. For example, one staff member said that some teenagers simply do not want to go to school. Another suggested that once students are doing poorly academically, they no longer want to attend school. Other staff members thought that teenagers who have been out of school for some time had a hard time returning.

Staff in the local DSS agency visited for the study believe that lack of child care funding poses

no barrier to school attendance for minor parents receiving cash assistance. According to these staff members, adequate child care funding is available for young parents receiving cash assistance who want to attend school. Similarly, local staff reported that access to providers is not a major problem, because young parents typically prefer using relatives for day care. DSS is very flexible concerning the use of relatives for child care. The agency will pay for a relative to provide care and does not require that the relative be certified by the state to be reimbursed. However, some local staff members reported that the extremely limited child care available in the schools in the area may be a barrier to school attendance for some young mothers who prefer this type of care. Only one small school in the area (a special school for new mothers, with a substantial waiting list) offers on-site child care.

Local DSS staff from this agency reported that very few special schools or education programs are available in the area that are specifically designed for teenage parents. Some staff suggested that the lack of special education programs for young mothers may be a significant barrier to school attendance for some teenage parents. Others believed that this was not a major obstacle to school attendance, because many minor parents continue to attend regular high schools.

D. IMPLEMENTATION OF THE LIVING ARRANGEMENT REQUIREMENT

1. The Planning Phase

According to state DSS officials, the minor parent living arrangement requirement involved, for two reasons, much less planning and training than did the Learnfare attendance requirement. First, unlike Learnfare, the living arrangement requirement did not involve coordinating with other state and local agencies. Second, and more important, the living arrangement policy affects far fewer cash assistance cases than does the attendance requirement. DSS estimates that fewer than 500 minor parents receive cash assistance statewide. Moreover, under the living arrangement policy, only minor parents who head their own cash assistance cases must have their living arrangements regularly monitored. In January 1997, only 116 minor parents headed their own cash assistance cases statewide, which represents only 0.2 percent of all cash assistance cases (Table D.1). In contrast, during the first year Learnfare was in effect, more than 100,000 school-age children who received cash assistance in Virginia were subject to Learnfare and its monthly monitoring of attendance.

According to state DSS officials, during the planning phase for the living arrangement requirement, staff members from local DSS agencies expressed two concerns. First, some welfare caseworkers felt they did not have adequate training to make determinations concerning the appropriateness of a minor parent's living arrangement. It is up to individual caseworkers to determine whether compliance with the living arrangement requirement threatens the physical or emotional well-being of the minor parent and whether an unrelated adult with whom the minor is living can serve as an appropriate guardian. State officials report

that DSS addressed this concern by giving local agencies flexibility in determining the appropriateness of living arrangements and by allowing them to involve social workers in the process. [\(6\)](#)

Second, some local DSS agencies expressed concern about the fact that the state had provided no funding for group homes for minor parents when imposing the living arrangement requirement. These agencies worried that a substantial number of minor parents would be unable to live with their parents and would have to be housed at agency expense. However, according to state-level DSS officials, because such flexibility exists in acceptable living arrangements for minor parents receiving cash assistance, alternative housing is rarely needed. Therefore, in the view of state staff, this local concern turned out to be unfounded. Moreover, the state welfare reform law requires only that local DSS agencies assist minor parents who are unable to live with an adult guardian in finding alternative adult-supervised housing; it does not require local agencies to pay for this housing.

2. Elimination of the Priority Ranking of Living Arrangements

When DSS wrote the original regulations for the living arrangement requirement during summer 1995, the agency imposed a priority ranking of the living arrangements of minor parents. DSS's ranking, from most to least desirable, was (1) with a parent, (2) with a legal guardian, (3) with another adult relative, and (4) with an unrelated adult. Under the original rules, unmarried minor parents were required to live in the highest-ranked arrangement possible. Therefore, a minor parent living with her grandmother was required to move back in with her mother or father unless there were strong reasons to suspect that the minor parent would be at risk of physical or emotional abuse. If a minor parent refused to move back in with her parents, her cash assistance case was closed, even if she was living with another adult relative.

According to state-level DSS staff, local agencies found this priority ranking difficult to enforce. Moreover, they considered it bad policy to force minor parents out of stable living situations with an adult relative to return them to their parent's home. After hearing these local concerns, state DSS officials decided that they had, as one staff member put it, "gone beyond the law" in imposing the strict priority ranking of living arrangements, since the original state legislation creating the requirement specified no such ranking.

For these reasons, DSS eliminated the priority ranking in July 1996. Under current DSS policy, a minor parent must live with either her parent or an adult 21 or more years old standing in loco parentis. Welfare caseworkers are expected to assess whether the adult with whom the minor is living can serve in such a capacity. State-level DSS policy explicitly eliminates only adult boyfriends as allowable guardians, since, according to state-level staff, their relationship toward a minor would clearly not be a parental one.

3. Monitoring Living Arrangements

At the time of application for cash assistance, and every six months at recertification, minor parents who head their own cases must provide a lease, landlord statement, or some other form of third-party verification of where they live and who lives with them. This verification is also required when the minor parent reports a change of address. According to staff in the local DSS agency visited for the study, when a minor parent applies for cash assistance, intake workers first consult local school district records to try to verify a minor parent's address and the name of her guardian. Local welfare staff are able to access this information from the welfare office through a direct link to the district's computer system. For minor parents living in public housing, intake workers can also verify living arrangements by using the local welfare agency's computer data link to local housing authority records.

4. Enforcement of the Living Arrangement Requirement

Under state law, if a minor parent receiving cash assistance does not comply with the living arrangement requirement, her cash assistance case must be closed. Similarly, if a minor parent applying for assistance does not comply with the requirement, her application for assistance must be denied. DSS data indicate that, during the first 18 months under the new policy, 51 minor parents in Virginia had their cash assistance cases closed, and 71 had their applications denied because of failure to comply with the living arrangement requirement (Table D.3).

The rates of case closings and application denials have slowed over time. During the first six months of the living arrangement requirement, DSS closed minor parent cash assistance cases and denied minor parent applications for violation of the policy at the rate of five or six a month. A year later, these rates had slowed to one or two a month (Table D.3). There are several possible explanations for this substantial decline. First, the more flexible living arrangement policy imposed

TABLE D.3

CASH ASSISTANCE CASE CLOSINGS AND APPLICATION DENIALS FOR VIOLATION OF THE MINOR PARENT LIVING ARRANGEMENT REQUIREMENT JULY 1995 THROUGH DECEMBER 1996

| | July 1995 Through December 1995 | January 1996 Through June 1996 | July 1996 Through December 1996 | July 1995 Through December 1996 |
|--|---------------------------------------|---|---------------------------------------|---------------------------------------|
| | | | | |

| | | | | |
|--|----|----|---|----|
| Number of Minor Parents Whose Cash Assistance Cases Have Been Closed for Violation of the Residency Requirement | 33 | 9 | 9 | 51 |
| Number of Minor Parents Whose Cash Assistance Applications Have Been Denied for Violation of the Residency Requirement | 33 | 30 | 8 | 71 |

Source: Virginia Department of Social Services automated data.

in July 1996 (which eliminated the priority ranking of living arrangements) may have resulted in fewer case closings and application denials during the later period. Second, application denials may have declined because, as word spread of the new requirement, fewer minor parents who preferred to live independently applied for cash assistance. Third, fewer cash assistance cases may have been closed in the later period because, by that time, most minor parents who preferred to live independently had already had their cases closed or their applications denied, or had chosen not to apply for assistance. Fourth, compliance with the policy may have increased over time as minor parents became more convinced that cases would actually be closed and applications denied for violation of the living arrangement requirement.

5. Exemptions from the Living Arrangement Requirement

Under state law, a minor parent receiving cash assistance is exempt from the requirement that she live with a parent or other responsible adult when:

- She is married.
- She has no living parent or adult guardian whose whereabouts are known.
- The local DSS agency determines that if she lives with her parent or guardian, her or her child's physical or emotional health or safety would be jeopardized.

According to DSS data, exemptions from the living arrangement requirement are relatively rare. In January 1997, according to data from DSS's computer tracking system for all cash assistance cases, 17 minor parents on cash assistance lived independently statewide (Table

D.4). This number represents less than four percent of minor parents receiving cash assistance in the state.

TABLE D.4

**LIVING ARRANGEMENTS OF MINOR PARENTS RECEIVING CASH ASSISTANCE
IN VIRGINIA IN JANUARY 1997**

| | Percentage | Number |
|---|--------------|------------|
| Living | | |
| With a parent or another adult relative | 85.9 | 402 |
| With a legal guardian | 7.3 | 34 |
| With an unrelated adult | 2.8 | 13 |
| In a group home | 0.4 | 2 |
| Independently | 3.6 | 17 |
| Total | 100.0 | 468 |

Source: Virginia Department of Social Services automated data.

Local DSS agencies are required by state law to assist minor parents who are unable to live with a parent or other responsible adult to locate alternative adult-supervised housing. However, according to state DSS officials, minor parents on cash assistance in Virginia rarely require alternative housing. According to DSS data, in January 1997, only two minor parents on cash assistance statewide lived in group homes (Table D.4). It is unclear whether these data support DSS's assertion that alternative housing is rarely needed. The extremely small number of minor parents in group homes may reflect the limited supply of these facilities in the state, as well as the limited demand.

6. Lessons Learned During Implementation of the Living Arrangement Requirement

When asked for advice they had for other states, DSS officials recommended that states use a broad, flexible list of acceptable living arrangements for minor parents when imposing a living arrangement requirement. According to DSS officials, they recommended this strategy because it allows greater flexibility for local agencies but still meets the goal of a stable and supportive living arrangement for minor parents. Furthermore, state staff indicated, this flexibility helps avoid the problems and opposition DSS encountered during the first year of the living arrangement policy, when they required minor parents to live with a parent if at all possible. Moreover, it avoids the substantial costs of placing large numbers of minor parents in

group homes.

Rather than place substantial numbers of minor parents in group homes at DSS's expense, the agency plans to have caseworkers make an extra effort to find an adult guardian for minor parents unable to live with a parent. To ensure that such an adult is available, DSS has implemented a broad definition of the type of adult considered an appropriate guardian. Any adult who is at least 21 years old and considered capable by the local DSS agency of serving in loco parentis can serve as a guardian.

1. Agency officials reported that, based on previous DSS reviews of cases identified in this manner, this method was quite accurate in identifying actual minor parents.
2. In spite of the large number of students reported by the school district as truant each month, relatively few receive a sanction. For example, during February 1997, only four Learnfare sanctions were imposed by this large local agency.
3. Among teenagers in Wisconsin's Learnfare program, two percent were sanctioned in their first semester in the program (State of Wisconsin Legislative Audit Bureau 1995).
4. This analysis is restricted to minor parents who were younger than 18 on July 1, 1996. All minor parents included were therefore subject to the Learnfare attendance requirement for at least six months.
5. Exact figures for the 1996-1997 school year were not available at the time this study was conducted.
6. Officials at the large local DSS agency visited for the study reported that, because they so rarely encountered minor parents who wanted to live independently, they did not consider lack of training a major issue.

***Implementing Welfare Reform Requirements for Teenage Parents:
Lessons from Experience in Four States***

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