

TANF Grant Guidelines

January 2015

The Federal Temporary Assistance for Needy Families (TANF) block grant allows states to allocate resources for a broad array of services that promote the four purposes of the TANF statute: assisting needy families so children may be cared for at home, ending dependence of needy families on government benefits by promoting work and marriage, reducing non-marital pregnancies and encouraging the formation and maintenance of two parent families. In Minnesota, TANF funds allocated through the Local Public Health Act can be used for eligible program services including non-medical home visiting for families, Women's Infants and Children (WIC) clinic services, and youth development: focus on reducing out of wedlock births.

These TANF Grant Guidelines provide local public health agencies guidance regarding eligible services, eligible populations, determination and documentation of eligibility, matching requirements, allowable program and administrative costs, reporting requirements and intervention examples. The Federal Poverty Guidelines referenced in this document are produced by the Department of Health and Human Services (HHS) and are updated on an annual basis. The most current Federal Poverty Guidelines may be accessed by going to <http://aspe.hhs.gov/poverty>.

I. Eligible Program Services

Includes services provided by a professional staff in one or more of the following program areas: non-medical home visiting for families, WIC clinic services, or group youth development activities focusing on reducing out of wedlock births.

A. Non-Medical Home Visiting for Families

Interventions designed to foster healthy beginnings, improve pregnancy outcomes, promote school readiness, prevent child abuse and neglect, reduce juvenile delinquency, promote positive parenting and resiliency in children, and promote family health and economic self-sufficiency for children and families. TANF funds can not be used to fund home visits that provide medical services such as home health care.

B. Women's, Infants and Children (WIC) Clinic Services

Interventions that address nutritional issues of women, infants, and young children through WIC clinic services. No more than forty-nine percent (49%) of the total annual award of TANF funds may be used for WIC services.

C. Youth Development: Focus on Reducing Out of Wedlock Births

Interventions in this service area should be evidenced based or promising practice strategies that address the risk and/or protective factors contributing to teen pregnancy and involve youth and their parents in the development and implementation of activities. The need for interventions in this area should be developed based on a needs assessment of the community. Activities should be coordinated with other community efforts, build partnerships to mobilize the community in addressing the issue of teen pregnancy and must occur in a group setting.

II. Eligible Populations

Family home visiting and WIC services using TANF funds may only be provided to families who are receiving federal funded MFIP or have an adjusted gross income at or below 200% of federal poverty guidelines and who are U.S. citizens or eligible non-citizens and who live in an eligible household (See III.B.2). Eligibility for services must be documented in the individual's case record. Group youth development activities focused on reducing out of wedlock births do not require documentation that youth meet income and citizen status, but activities should be directed to eligible populations.

III. Determination and Documentation of Eligibility for Family Home Visiting or WIC Clinic Services

To receive family home visiting or WIC services funded by TANF dollars, a family must be receiving federally funded MFIP OR have an adjusted gross annual household income equal to or less than 200% of federal poverty guidelines, be a U.S. Citizen or an eligible non-citizen, and live in a household comprised of a minor child or a pregnant woman. Eligibility determinations must occur at least once every 12 months. An agency providing services must determine whether the participant meets the income and citizen eligibility criteria and document in their record the participant's eligibility. See Section III D for documentation guidelines.

A. Automatic Eligibility Screening

A family receiving federally funded Minnesota Family Investment Program (MFIP) can be determined automatically eligible for home visiting or WIC services.

If a family is receiving state funded MFIP, they are NOT automatically eligible for TANF funded home visiting or WIC services.

Information on whether a recipient is receiving federal or state funded MFIP can only be obtained by contacting the local social service agency.

B. Non Automatic Eligibility Screening

If a family is not receiving federally funded MFIP, eligibility screening is required. Family composition, citizen status, household size and income levels are critical components of the eligibility screening process.

1. Eligible households

A household must consist of either:

- A pregnant woman
- Parent(s) or guardian(s) and a child or children under age 18
- Parent(s) or guardian(s) and a child or children age 18 and 19 who attend secondary school

2. Household size determination

Household is defined as a group of related or non-related individuals who are living together as one economic unit sharing income and consumption of goods and/or services. The total number of individuals sharing income and consumption of goods and/or services comprises the household size.

It is possible that more than one household lives under one roof. An example: Residents of a homeless facility or an institution are not considered members of a single household. The following guidelines should be used to determine household size.

- a. If the family to be provided services is living without economic support from the other persons in the same residence, the family to be provided services is considered a separate household and only the members of the family unit to be provided services is counted to determine family size. However, if the family unit is fully sharing resources, then all the members residing in the household are counted in determining family size. If the family unit is only receiving temporary shelter (a place to sleep at night), the individuals making up that family unit would be considered a separate household. If the family unit is providing services (e.g. child care) in exchange for room and board, the family can be counted as a separate household.

A family who has little or no income to report should be asked to explain her/his situation to determine whether there is a household in which s/he should be counted, or if any public assistance, union benefits, unemployment or other sources of income are being received.

- b. A child who resides in more than one household as a result of joint custody shall be considered part of the household of the guardian who is receiving services. If, for example, a mother and child live together and receive child support payments from a father who does not live with them, the child is counted in the mother's household size and not the father's. When determining income, the mother must count the child support payment as income. If the father's household also requests TANF funded services, the father may not deduct child support payments for the reported income from his household, since deductions are not allowed. However, all children being supported may be counted as part of the household.
- c. A foster child who is living with a foster family but remains the legal responsibility of a welfare or other agency shall be income eligible for services.
- d. An adopted child is counted in the household size of the family with whom s/he resides.
- e. A child family member who resides in a school or institution is counted as a member of the household if the participant's family pays for the child's support.
- f. A pregnant woman should be counted as two, taking into consideration the unborn fetus. If there is more than one fetus, the household size can be increased by the number of expected births.
- g. A pregnant unmarried teen (under 18 years of age) or an unmarried teen (under 18 years of age) with a child or children can be counted as a separate household.
- h. In determining household size, a child must be under the age of 18, or be 18 or 19 and enrolled full time in a secondary school. If the child is 18 or 19, school verification of full time enrollment in a secondary school must be attained.

3. Income Determination

- a. Local agencies may establish their own policy of what to do when an applicant does not have the necessary income information at the initial home visit.
- b. Income information is required except in extenuating circumstances where this requirement would pose an unreasonable

barrier to participation. Examples of extenuating circumstances would be:

- Homeless woman or family
- Instances where there is domestic abuse
- Natural disasters

c. When calculating income, the adjusted gross income of the family during the last twelve months, the month prior to application or their current income rate may be used, whichever reflects the family's status most accurately. However, a local agency must apply the same method consistently for each applicant of the same type of case (e.g., all persons who are seasonal workers or all persons who are on strike). For self-employed persons whose income fluctuates, persons on extended or maternity leave and students, and seasonal workers who do not work 12 months of the year or are laid off and rehired, eligibility must be determined based on adjusted gross annual income. If they are not rehired as expected, their eligibility should be redetermined at that time. If an individual receives child support on an infrequent or inconsistent basis, an annual income determination might be more appropriate.

d. Income includes all of the following:

- Monetary compensation for services, including wages, salary, commissions, or fees
- Adjusted gross income from farm and non-farm self-employment (use the most current income tax statement)
- Social Security benefits
- Dividends or interest on savings or bonds, income from estates or trusts, or net rental
- Public assistance or welfare payments
- Unemployment compensation
- Government civilian employee or military retirement or pensions or veteran's payment
- Private pensions or annuities
- Alimony or child support payments
- Regular contributions from person not living in the household
- Net royalties
- Other cash income. This includes, but is not limited to, cash amount received or withdrawn from any source, including savings investments, trust accounts and other resources which are readily available to the family.

Do NOT include the following as income:

- The value of in-kind housing and other in-kind benefits. An in-kind benefit is anything of value which is not provided in the form of cash
- The value of assistance to children or their families under the national School Lunch Act, the Child Nutrition Act of 1966, and the Food Stamp Act of 1977
- The value of child care provided or arranged, or payments received under Child Care and Development Block Grants
- Payments or allowances received pursuant to the Home Energy Assistance Act of 1980
- Payments received under the Job Training Partnership Act
- Financial assistance received by an individual from any program funded under Title IV of the Higher Education Act of 1965 (including the Pell Grant, Supplemental Educational Opportunity Grant, State Student Incentive Grant, National Direct Student Loan, PLUS, College Work Study, and Byrd Honor Scholarship programs), which is used by the student for specified costs (such as books, equipment, materials, tuition, fees, supplies, and transportation)
- Any cash housing allowances received by military personnel living in off-base housing
- Infrequent and irregular income, such as cash birthday gifts.

C. Determination of citizenship or eligible non-citizens as defined under the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, Public Law 104-193 Determination.

1. All members of a household receiving family home visiting or WIC services must be citizens of the United States or eligible non-citizens. Verbal declaration of citizenship of all household members by parent or guardian must be recorded in the participant's chart. If a participant responds that all household members are citizens and the household meets all other eligibility criteria, TANF funded family home visiting or WIC services can be provided.
2. If a family home visiting or WIC participant who receives MFIP indicates that any member of the household is a non-citizen, the local county human services agency should be contacted to verify the funding source that is used to pay for the MFIP grant. If the funding source is federally funded MFIP, the eligible non-citizen criteria is met and family home visiting or WIC services can be provided. If the funding source for the MFIP grant is state funds additional determination of eligibility based on eligible non-

citizen status should be completed. Use the checklist in Appendix A to determine status.

3. If a family home visiting or WIC participant who does not receive MFIP indicates that any member of the household is a non-citizen use the checklist in Appendix A to determine if the family home visiting or WIC participant is an eligible non-citizen and thus, eligible for TANF funded services.
4. When providing youth development services, effort should be made to provide outreach for group activities to communities that are citizens or eligible non-citizens. It is not necessary to determine or document the citizenship status of each individual in the group.

D. Documentation of Household Size and Composition, Income and Citizenship Status for Family Home Visiting and WIC Services.

Local agencies must keep at a minimum the following information in the participant's chart. The documentation may be kept in a format that meets the agency's needs.

Is the family receiving federally funded MFIP? YES/NO

If family is not receiving federally funded MFIP the following information must be documented on the participant's chart:

Are all members of the household US citizens/eligible non-citizens? YES/NO

Is annual household income at or below 200% of federal poverty guidelines? YES/NO

Household includes (indicate all that apply):

_____ A pregnant women (age 20 or over)

_____ Child under age 18

_____ Child 18 and 19 who attends a secondary school full time (school verification required)

_____ An adolescent (19 and under) who is pregnant or parenting

IV. Matching Requirement

No match is required.

V. Program and Administrative Costs

A. Program Costs

Includes expenditures made to implement or support program activities.

Expenditures can include salary and fringe benefits for staff directly involved in program activities. It also can include actual costs of such things such as training materials, conference registration, mileage, outreach activities, educational and safety materials for families, program planning, evaluation or purchase of a computer.

The following CANNOT be reimbursed: patient medical care, family planning medical services, capital improvements or alterations, cash assistance paid directly to clients, childcare or client transportation, or any cost not directly related to the grant.

B. Administrative Costs

Costs that represent the expenses of doing business that are not easily identified with the program but are necessary for the general operation of the organization and the conduct of activities it performs. Examples of such expenses include accounting, human resources, general agency administration, and costs to operate and maintain facilities.

Administrative costs can be computed as an indirect cost rate or through a cost allocation plan. Administrative costs cannot exceed 10 percent of the invoiced program costs or agency's standard cost whichever is lower. Administrative costs can only be incurred on expenditures.

VI. Reporting Requirements

A. Invoices

Invoices are due on the 20th day of the month following the end of the quarter.

October 20 for services provided July 1 through September 30

January 20 for services provided October 1 through December 31

April 20 for services provided January 1 through March 30

July 20 for services provided April 1 through June 30

B. Plan and Evaluation

Reporting requirements related to the Plan that must be submitted by local public health departments and evaluation reports will be provided at a later time after the Family Home Visiting Steering Committee and Evaluation Work Group recommendations are received.

VII. Intervention Examples

A. Family Home Visiting

Family Home Visiting Interventions.

B. WIC Clinic Services

Nutrition services.

C. Youth Development: Reducing Out of Wedlock Births

Adolescent Pregnancy Prevention Interventions.

APPENDIX A

Family Home Visiting Non-Citizen Checklist

The purpose of this checklist is to act as a reference guide to determine if a client is a qualified non-citizen eligible for home visiting services to be reimbursed through federal TANF funds.

When a family containing non-citizens receives MFIP, contact the local county human services agency and verify with the agency the funding source that is used to pay for the MFIP grant. If the funding source is federal or TANF, the home visiting services the non-citizen criteria is met. If the funding source is state dollars, the home visiting services cannot be reimbursed through TANF.

When the non-citizen family does not receive MFIP, use the following procedure. Ask for an unexpired immigration document. Nearly every non-citizen who lawfully enters the country will have a foreign passport, or is issued an I-94 or I-551 document. If the non-citizen has no documentation or expired documents, do not use TANF funds to pay for the visit. If the non-citizen has documentation follow the procedures below.

1. If the non-citizen has an I-551 card, check admission/adjustment date (residency since);
 - A. If the date is before 8-22-96, the client is eligible for services reimbursed through TANF funds.
 - B. If after 8-22-96, check #2.
 - C. If the non-citizen has an I-94 or a foreign passport, see #4.
 - D. If the non-citizen has other documentation, see #6.
2. Ask about United States military service: the individual's spouse's and dependent child's parent's. If the non-citizen has a DD-214, and the other family members meet the citizenship criteria, the family is eligible for reimbursement through TANF federal funding. If there is no military service documentation, go to #3.
3. Check class category code on the documentation:
 - A. If the code is 'RE', 'AS', 'CU', or 'AM', the non-citizen is eligible for services reimbursed through TANF funding.
 - B. If any other code, (i.e. 'IR1', 'CR1', 'CR2', or 'F11', 4) the client is NOT eligible for services reimbursed with TANF funds for 5 years from the date of entry into the U.S.

- C. For all other codes, the family is NOT eligible to be reimbursed with TANF funds.
4. An I-94 and/or foreign passport will be stamped at the time of entry with the date and the immigration category (class) or section of the law under which the non-citizen is granted admission.
- A. If the class code is a single letter and number, e.g. A-1, B-2, F-1, etc., the client is NOT eligible for services reimbursed through the TANF program.
- B. If the stamp says “Processed for I-551...”, the client must meet A, B or D in #1.
- C. If the stamp says “Admitted as a refugee...”, “Asylum status granted...”, or refers to I & N Act sections 207, 208, or 203(a)(7), go to #5.
- D. If the stamp says “Paroled until...” or refers to section 212(d)(5), see below:
- If “Cuban/Haitian Entrant” (sometimes “C/H” only) is written in, see #3A.
 - If the date of parole is granted to the date the form expires is one year or more, or indefinite (indef.) and the date of entry is before 8-22-96, the person is eligible for services reimbursed through TANF.
 - If the date of parole is less than 1 year, the client is NOT eligible for services funded through TANF.
5. Refugees (RE), people granted asylum (AS) or withholding of deportation (or withholding of removal), Cuban or Haitian entrants (CU/CH) and Amerasian immigrants(AM) are eligible for services funded through TANF funds.
6. An Employment Authorization card may indicate a non-citizen is a refugee (code ‘A#’) or asylee (code ‘A5’) but will not indicate a status date. The possession of an Employment Authorization card itself is not evidence of eligibility for funding through TANF. Some non-immigrants, such as foreign students, may have permission to work, but non-immigrants are ineligible for services reimbursed with TANF funds.