



Memo

To: Career Advancement Program Partners
Refugee Center Partners providing Career Advancement Program Services

From: SFW Adult Programs

Date: March 3, 2008

Re: Work Referral of Teen Parent Heads of Household

PURPOSE:

To inform Career Center and Refugee Center Partners of the change in the Department of Children and Families (DCF) procedure for referring teen parent heads of household to the Career Advancement Program (CAP)

BACKGROUND:

Previously, a parent who was considered a "teen parent" was not referred to the Career Advancement Program (CAP) for engagement with the exception of rare circumstances:

- The teen parent was 19 years of age;
- The teen parent had obtained a high school diploma or a General Equivalency Diploma (GED); or
- The teen parent was a parent was 18 years of age and had dropped out of a secondary education/GED program.

Teen parents usually do not receive Temporary Assistance for Needy Families (TANF) funded cash assistance directly. In the State of Florida, a "minor" parent must receive TANF-funded cash assistance through an adult payee. Most teen parents have an adult payee assigned to receiving TANF-funded cash assistance on behalf of the teen parent and related child(ren). However, there are some teen parents who receive the TANF-funded cash assistance directly for a variety of reasons. For example, the teen parent is married, emancipated or the State has not been able to designate a responsible adult payee. Teen parents who are minors that receive the TANF-funded cash assistance payment directly are called "minor heads of household." Minor heads of household are included in the participation rates.

Eligibility Requirements-Florida Statutes Chapter 414

Heads of household who are under 18 years of age and do not have a high school diploma or a GED are required to attend school or engage in a program that leads to a secondary education diploma/GED as a condition of eligibility for TANF-funded cash assistance. An 18 year old who does not have a high school diploma or a GED and has dropped out of school may apply for assistance as an adult. This teen parent is not considered a “minor” in the State of Florida. As a legal adult, age 18, the teen parent may apply for cash and be subject to participation requirements.

Participation Credit Based--Federal Regulations

Education or training for teen parents under the age of 20 who do not have a high school diploma or a GED may include educational programs that are vocational in nature but also assist the teen parent with securing a secondary education diploma or GED. Federal law also emphasizes the importance of teen parents securing a high school diploma or a GED by allowing heads of household who are under the age of 20 to be considered meeting performance requirements for participation rate purposes if:

- A single parent head of household who does not have a high school diploma or a GED maintains “Satisfactory attendance in a program that leads to a secondary education diploma or a GED”;
- A single parent head of household who does not have a high school diploma or a GED and who participates in “Education directly related to employment” for an average of 20 hours per week;
- A two-parent family with two work-eligible heads of household without a high school diploma or a GED both participate in one of the following educational activities for an average of 20 hours per week: Maintains “Satisfactory attendance in a program that leads to a secondary education diploma or a GED”; and/or “Education directly related to employment.”

Prior to Federal Fiscal Year 2007, minor heads of household were counted as fully participating for the participation rates if the DCF’s data entry system indicated that they were attending school. However, the internal controls outlined in the Interim Final Rule require the State to collect documentation of participation and proof of satisfactory progress for individuals engaged in secondary education programs. Although the Final Rule published in 2008 may allow the State of Florida to change the Work Verification Plan, Florida is operating under an approved Work Verification Plan that requires “satisfactory progress” for hours to be included in the participation rates if the participant is engaged in “Satisfactory attendance in a program that leads to a secondary education or a GED” or in “Education directly related to employment”. This was required by the United States Department of Health and Human Services (HHS) when the initial Work Verification Plan was being drafted and approved. The Interim Final Rule is in effect until October 1, 2008. For school attendance to be included in the participation rates:

- The number of hours the teen parent is required to attend to meet satisfactory attendance must be established in advance with a schedule or syllabus from the educational institution;
- The hours of participation must be verified by a designee established by the institution;

- The actual completed hours must be documented according to Florida's Work Verification Plan; and
- Currently the participant must also be progressing at a satisfactory rate. Satisfactory progress must be documented and retained in the case file. Although the Final Rule published in 2008 modifies this requirement, Florida is still required to operate under its approved plan until October 1, 2008.

Effective March 1, 2008, the DCF will refer all work eligible minor heads of household to the Career Advancement Program (CAP) as mandatory program participants.

ACTION REQUIRED:

Teen parents receiving TANF-funded assistance and who designated as heads-of-household will be referred to the Career and Refugee Centers for engagement in the Career Advancement Program (CAP) starting March 1, 2008 by the DCF. This is less than 50 cases Statewide.

Work Registration-teen parents who are under 19 years of age and are in school full-time will not be required to register for work. If an 18 year old is in school full-time and demonstrates full-time attendance at the time of application with DCF, the applicant will not be required to complete the work registration process. If an 18 year old has left school (dropped out), the teen parent may still receive cash assistance. The teen parent will be required to register for work and will be subject to penalties. *The DCF will determine if the teen parent is subject to the work registration requirements.* If the teen parent is required to register for work, (s)he will be provided the appropriate directions to complete the work registration process at the local Career Center. The DCF will be responsible for denying assistance if the teen parent does not cooperate with work registration requirements.

- The Career and Refugee Centers will be required to engage the program participant once referred to the (CAP) program.
- An initial assessment of the participant's skills, work history and employability must be completed within 30 days of becoming eligible for assistance and being referred to the (CAP) program.
- The Career Advancement Program (CAP) staff and program participants must develop and sign an Individual Responsibility Plan (IRP) as required under the Florida TANF State Plan.
- The Career and Refugee Center staff will be required to track the attendance and progress of teen parents who are engaged in education, training and other activities.

The focus of participation is to assist teen parents without a high school diploma or a GED with securing a secondary diploma or a GED. After assessing the participant's needs, barriers, skills and goals, the participant may choose to participate in an alternative education/employment program that combines hands-on-training and classroom activities. The Career and Refugee staff may choose to engage participants in a manner that meets the participants' learning styles, needs, barriers and goals. However, minors are subject to the Child Labor laws.

- If the teen parent head of household stops attending school, training and/or other assigned program, the counseling process must be initiated.

If the Career and Refugee Center staff learns that a teen parent head of household is not attending school or the teen parent fails to provide verification of attendance/progress, the Career and Refugee Center staff must initiate the counseling process.

Staff should follow the counseling process according to the Work Penalty and Pre-Penalty Guidance paper. If the teen parent is under 18 years of age and does not have a high school diploma or a GED, program staff should not request a sanction beyond level one. The sanctions are not requested in a progressive manner while the participant who is under the age of 18 and does not have a high school diploma or GED. Once the participant turns 18 years of age or secures a high school diploma or a GED, the participant is subject to the sanction levels.

- If the Career and Refugee staff requests a sanction on a teen parent head of household (18 years of age or younger) who does not have a high school diploma or a GED for failure to attend school, the participant may go to the DCF and show proof that they have returned to have the sanction removed. Because participation in a secondary education program or an equivalent program is a condition of eligibility, the participant does not necessarily have to bring the documentation to the Career and Refugee to have the penalty removed from the case.
- The Career and Refugee staff should receive an alert from the DCF stating that the penalty has been removed once the teen parent head of household had demonstrated to the DCF that (s)he has returned to school.
- If the teen parent head of household provides current proof of school attendance to the (CAP) provider, the sanction should be lifted accordingly.
- Once the teen parent head of household has been referred to the (CAP) program, program staff must engage the participant.
- If the participant stops attending school again, the Career and Refugee Center staff must initiate the pre-penalty process. If a sanction is warranted, the teen parent should be sanctioned, but the sanction level will remain at the first level.
- Teen parent heads of household, who have a high school diploma/GED or are at least 18 years old and are not attending school, must be engaged in countable work activities.
- Teen parent heads of household who fall under this category are required to work register as a condition of eligibility.
- This population must be engaged according to federal and State law.
- This population is subject to sanction levels like other cash assistance recipients who are non-compliant with (CAP) program requirements, including the progression of sanction levels if there are several occurrences of noncompliance.