



Department of Human Resources
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FIA ACTION TRANSMITTAL

Issuance Date:
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**TO: DIRECTORS, LOCAL DEPARTMENTS OF SOCIAL SERVICES
 DEPUTY/ASSISTANT DIRECTORS FOR FAMILY INVESTMENT
 FAMILY INVESTMENT SUPERVISORS**

**FROM: KEVIN MAHON, EXECUTIVE DIRECTOR, FIA
 LINDA HEISNER, EXECUTIVE DIRECTOR, CCA**

RE: MINOR CUSTODIAL PARENT AND EDUCATIONAL REQUIREMENT

PROGRAMS AFFECTED: TEMPORARY CASH ASSISTANCE

**ORIGINATING OFFICE: OPA/ DIVISION OF PROGRAM POLICY AND
 REGULATION**

BACKGROUND:

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 included two new requirements for minor parents. Maryland had already implemented the requirement that minor parents live with a parent or other adult representative. This action transmittal outlines the policy regarding minor custodial parents and school attendance.

OLD POLICY

Minor parents under age 16 who were not in school had the \$25.00 PPI disallowance imposed. Those that were 16 and 17 and not in school were referred to Project Independence where education needed to be a component of the work activity.

NEW POLICY

All minor custodial parents with a child over 12 weeks of age must be enrolled full time and attending school, or an alternative educational or training program approved by the state, to be included in the TCA assistance unit. The educational curriculum must result in the individual acquiring a high school diploma or equivalent. To meet the attendance requirement, the minor custodial parent must attend 80% of the time. Minor custodial parents not in compliance with the education requirement will be removed from the TCA grant until they comply for 30 days.

- * A minor parent who is the head of household and not in school receives a full family sanction since that parent has not complied with the work requirement.

This policy applies to all custodial parents under the age of 18 with a child over 12 weeks old. All minor students who are not parents who do not comply with the 80% attendance requirement will receive a \$25.00 disallowance. Minor custodial parents who are not in compliance with the attendance requirement are ineligible.

IMPLEMENTATION REQUIREMENT:

The minor custodial parent education requirement must be explained to all customers applying for TCA on or after December 9, 1996. At application, the minor parent's school enrollment must be documented. Minor parents who are not enrolled in school will be excluded from the TCA grant until they are enrolled. The 80% attendance will be monitored at the first and all subsequent redeterminations.

At the first redetermination on or after December 1996, the minor custodial parent education requirement is explained when applicable. If there is an educational disallowance of \$25 for not meeting the attendance requirement, the disallowance will become an individual sanction for the minor parent who is still not in compliance at the next redetermination. If the minor parent is not enrolled in school or another approved educational program, the minor parent is removed from the grant until enrolled. When the minor parent is attending school 80% for one month, the minor parent can be added back on the grant effective the month after proof is obtained. Case managers should stress the need that all children, whether minor parents or not, meet the 80% attendance requirement.

Purchase of child care (POC) will continue to be given if the minor parent is still enrolled in school. If the minor parent is sanctioned and not included in the grant because of failure to meet the 80% attendance requirement, the minor parent can apply for POC as a non-TCA category 4A teen parent if still enrolled in school.

ACTION REQUIRED:

AIMS

Application Process

- * If the minor parent is not enrolled in school, reduce the household size by subtracting the sanctioned minor parent. Enter the reduced household size on the AIMS 2.
 - * Include the reason for the reduced household size in your narrative and send a manual notice.
 - * If the minor parent complies by getting enrolled in school complete the AIMS 2 "ACHG" transaction to increase the

household size to include the minor parent.

- * Narrate the reason for the change in the household size and send a manual notice.

Initial Redetermination Process

- * If the case is receiving a disallowance for non-compliance, continue the disallowance on the AIMS 2. Until the next redetermination if the minor is not attending 80% of the time.
- * If non-compliance continues at next redetermination reduce household size by subtracting the sanctioned minor parent. Enter the reduced household size on the AIMS 2.
 - * Narrate the reason for the change in the household size.
 - * Send a manual letter
- * If the minor is in compliance remove the disallowance on the AIMS 2.

CARES

Application Process

- * If the minor parent is not enrolled in school, enter the minor on STAT screen as a non member.
- * Be sure to enter any assets or income for the minor parent on the ASTI, AST2, UINC, ERN1 and ERN2 screens as CASH countable income only, if applicable.
- * PF9 and enter on remarks the reason for the additional income. Also include this information in your narrative.
- * Add text to your notice explaining that the minor parent is sanctioned for non-compliance with the educational requirement.

Initial Redetermination Process

- * If the case has a disallowance because the minor parent is not meeting the educational requirement, allow the disallowance to continue.
- * At the next redetermination, if the minor parent is still not complying change the minor parent to a non-member on the STAT screen.

- * Be sure to enter any assets or income for the minor parent on the AST1, AST2, UINC, ERN1 or ERN2 screens as CASH countable income, if applicable.
- * PF9 and enter on remarks the reason form the additional income. Also include this information in your narrative.
- * Add text to your notice explaining that the minor parent is sanctioned for non-compliance with the educational requirement.

ACTION DUE DATE:

The policy is effective December 9, 1996 for applicants and at first redetermination or interim change after January 1, 1997 for recipients.

INQUIRIES:

Inquiries may be directed to Patricia Jeffers, Division of Program Policy and Regulations, at 410 767-7143.

KM/ bbs

**cc: DHR Executive Staff
FIA Management Staff
Constituent Services**