

Department of Health and Human Services

**OFFICE OF
INSPECTOR GENERAL**

**HEAD START, TANF, AND CHILD CARE
NEEDS ASSESSMENTS**



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EXECUTIVE SUMMARY

PURPOSE

To describe efforts to assess family needs and provide support services to low-income families receiving Head Start, Temporary Assistance to Needy Families (TANF) and Child Care and Development Fund (CCDF) subsidies.

BACKGROUND

Family Needs Assessments and Support Services

Welfare recipients and other low-income families may need help in order to enter the workforce and remain self-sufficient. The replacement of the Aid to Families with Dependent Children program with TANF block grants heightens the importance of providing services that will enhance the employment outcomes for welfare participants. Federal legislation requires that both TANF and Head Start agencies assess participants' needs to help them address barriers to employment and self-sufficiency. There is no formal requirement that CCDF-funded child care programs or Child Care Resource and Referral agencies who administer subsidies assess family needs or offer support services.

This report examines needs assessments and support services in these three programs in order to learn how to maximize efforts to help families reach and maintain self-sufficiency. It draws on interviews and reviews of case files, policies and procedures of Head Start grantees, TANF agencies and child care providers in six communities as well as with their respective State offices. We interviewed 77 parents or guardians of young children receiving Head Start, TANF and/or CCDF subsidized child care.

We define support services as those which help low-income families overcome barriers to employment such as emergency assistance (e.g. food, housing, clothing), intervention (e.g. mental health, substance abuse, child abuse and domestic violence), child care, transportation and health care.

FINDINGS

Head Start uses needs assessments to help low-income families move towards self-sufficiency

All Head Start grantees we visited conduct an individual family needs assessment to determine the need for support services and provide a variety of referrals and services for families. Nearly all Head Start families we interviewed report receiving information, referrals and some services from Head Start grantees.

State and local TANF agency policies, as well as caseworker discretion, affect the needs assessments, referral processes and the provision of support services that help families reach and maintain self-sufficiency

The TANF offices we visited focus almost exclusively on vocational needs. Most TANF agency policies indicate and staff respondents report that their focus is on assisting recipients make the transition from welfare to work. Support services to help families attain self-sufficiency are lacking in most cases.

Individual child care programs do not assess family needs. Although Child Care Resource and Referral agencies are not required to assess family needs, some may make informal assessments and refer families to needed services

Some low income families may get referral assistance for support services if they make their families' needs known when they call a child care resource and referral agency (CCR&R) for child care information or child care subsidy. The Federal CCDF block grant does not require child care programs or providers to assess family needs or offer additional services. Additionally, States we visited do not require families using CCDF child care subsidies be assessed for support needs.

The Head Start grantees, TANF agencies, Child Care Resource and Referral agencies and child care providers we visited do not coordinate around individual families' needs assessments. However, in some sites we visited, these agencies will make referrals to other agencies and frequently work together on community issues

Although they all serve low-income families, some of whom are the same families, none of the Head Start, TANF, CCR&Rs and child care providers we visited coordinate around an individual family's needs. Lack of coordination around a family's needs assessment may affect families' access to resources. In some States we visited, Head Start, TANF and CCR&R agencies communicate on matters not directly related to individual families and their needs assessments. While families enrolled in the Head Start program are more likely to have their needs assessed, be referred and access services than the families we interviewed receiving TANF or CCDF benefits, we found families in these three programs often lack knowledge about services when they are available in their communities.

OPPORTUNITIES FOR IMPROVEMENT

Head Start, TANF and child care programs serve many of the same low-income families who are trying to reach or maintain self-sufficiency. Both Head Start grantees and TANF agencies are required by law to assess families' needs and provide families with support services. Head Start grantees are also required to partner with other agencies. In order to maximize efforts to help families reach and maintain self-sufficiency, the Administration for Children and Families (ACF) could:

Explore strategies that encourage and facilitate coordination between agencies around needs, referrals and provision of services for families

As economic conditions change or the pool of easier-to-serve clients diminish, agencies will face increased demands on their resources, both in the numbers of families needing services as well as the extent of their needs. Coordination between Head Start, TANF and child care programs, as well as with other community agencies, will become more important in providing needed services to families trying to attain self-sufficiency.

The ACF could address current issues involving the coordination of families' needs, referrals and provision of services and anticipate future trends that may require additional interagency coordination. The ACF could devise ongoing methods to assist State, local and community agencies with communication and coordination in providing services based on family needs. For example, ACF could develop technical guidance on information sharing, convene regional or national conferences on coordination and communication between agencies, and disseminate best practices of coordination. The TANF and child care programs may be able to use Head Start grantees as resources to help them improve needs identification.

Encourage Head Start grantees, TANF offices, and child care programs to increase parent awareness about the resources they and other community agencies provide

The ACF could encourage Head Start grantees, TANF agencies and child care programs to train front-line staff to act as resources to identify community services. Many parents do not know where to find needed services. They are unaware that Head Start, TANF offices and child care programs are resources that may help them identify services that may be available to them in their communities.

In addition to these opportunities for improvement, there is one other area that the Office of Inspector General (OIG) will evaluate. Since both agency and family interviews indicated that in most TANF agencies we visited, needs assessments and referrals to support services are not regularly being offered, the OIG will examine the degree to which

States are complying with the law requiring them to “make an initial assessment of the skills, prior work experience and employability of each [TANF] recipient”¹ and “to conduct a program ... that... provides parents with support services to enable them to leave the program and become self-sufficient.”²

AGENCY COMMENTS

In their written comments, ACF wanted to distinguish between their legal authority to require State compliance and their encouragement for States to move in directions viewed as model practices. They also wanted to document certain actions they had already taken to address some of the underlying concerns expressed in our report. The full ACF comments are contained in the Appendix. Where appropriate, we changed the report to reflect their comments and concerns.

We recognize that the nature of the relationship between ACF and States has significantly changed since the implementation of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA). The ACF’s primary role is to ensure States’ compliance with TANF and CCDF regulations, while PRWORA gives the States unprecedented authority to administer the programs according to their own policy choices. The State’s TANF programs that have emerged are in various stages of development. States are still experimenting with ways to meet the PRWORA goals of reducing welfare dependency and helping participants reach and maintain self-sufficiency.

We agree with ACF that the nature, mission and goal of each State’s TANF program is not centered on family assessments. We further agree with ACF that TANF does not require States to enter into an individual responsibility plan with their clients. Our intent in the report is not to become overly-focused on a certain kind of formal needs assessment, but rather to meet the self-sufficiency needs of low-income parents and families served by these three programs. In order to help clients become self-sufficient, States first have to know what needs have to be met. In reviewing case files and discussing individual parent and family needs, we did not find, for the most part, that needs were being appropriately identified, either in a formal or informal way. Therefore, we have maintained our first suggested action but deleted the word “assessment” to avoid the impression we are encouraging TANF agencies and Child Care programs to conduct the same type of formal assessments as Head Start grantees.

¹ Public Law 104-193, Section 408(b)1

²Public Law 104-193, Section 402(a)(1)(A)(i)

The ACF supports the concept that all child care providers have information on community resources to assist families with assessments. We agree that many child care providers are not trained to do the assessment themselves, nor that they have sufficient resources to hire support service staff. However, we did not find examples of child care programs or State agencies in the sites we visited which emphasize linking families to community services which can provide assessments or needed services. We believe further attention should be focused on ensuring that parents receiving subsidized care have access to information about community resources.

The ACF stated that some collaboration among these three programs takes place. We support this collaboration. We emphasize that focusing local-level collaboration around identifying and providing for families' needs remains an opportunity for improvement. If families participate in two or three of these programs, local-level coordination can ensure a more focused plan for individual families and improve the efficiency of resource utilization.

Finally, as welfare caseloads continue to drop, States are increasingly looking for ways to help remaining recipients make the transition from welfare to work. Many of the recipients remaining on the rolls face myriad personal and family problems which may hinder rapid employment and long-term attachment to the labor force. Appropriate identification of needs can enable States to provide or refer recipients to the services which will help facilitate a successful transition to employment and self-sufficiency.

The Office of the Assistant Secretary for Management and Budget also commented on the report. They conceptually agree with the report, but point out that limited funding and the reduced Federal role in welfare administration may hamper the coordination efforts we recommend.

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INTRODUCTION

PURPOSE

To describe efforts to assess family needs and provide support services to low-income families receiving Head Start, Temporary Assistance to Needy Families (TANF) and Child Care and Development Fund (CCDF) subsidies.

BACKGROUND

Federal legislation involving welfare and Head Start changed the relationship between Head Start and TANF and has had considerable impact on child care as well. The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) replaced Aid to Families with Dependent Children (AFDC) with TANF block grants to States. The PRWORA imposed work requirements and lifetime limits on TANF recipients. Despite large reductions in the number of welfare recipients in the last 5 years, there are still nearly eight million TANF recipients, approximately two-thirds of them children.

The PRWORA also replaced existing child care funding for low-income families with a single integrated Child Care and Development Block Grant. Congress increased child care funding for fiscal years (FY) 1997-2002 to \$20.9 billion, a \$4 billion increase over the previous funding cycle. States use these funds to reimburse child care programs for serving eligible families or providing parents with child care certificates or vouchers to purchase child care. Program goals include: promoting parental choice, encouraging States to provide consumer education to parents, and helping States implement health, safety, licensing and registration standards.

The Head Start program, a comprehensive child development program funded at \$4.35 billion for FY 1998, with over 1,400 grantees, serves nearly 800,000 low income children and their families. Revised performance standards require Head Start grantees to coordinate with TANF, child care programs, and other social service agencies.

Needs Assessments and Support Services

Welfare recipients and other low-income families may need help beyond child care in order to enter the workforce and remain self-sufficient. Federal legislation requires that both Head Start and TANF agencies assess participants' needs to help them address barriers to

employment and self-sufficiency. Child care programs are not required to assess family needs.

The replacement of AFDC with TANF block grants heightens the importance of providing services that will enhance the employment outcomes for welfare participants. States must and are beginning to prepare to serve welfare recipients with tougher problems, moving beyond the “work first” approach to programs designed to help families access a wide range of services.³ In this inspection, we define support services as services which help families overcome barriers to employment such as emergency assistance (e.g., food, housing, clothing, and transportation), intervention (e.g., mental health, substance abuse, child abuse, and domestic violence), as well as employment services, child care, transportation and health care.⁴

Head Start Requirements

Head Start grantees offer parents the opportunity to develop and implement an individualized family partnership agreement that describes family goals, responsibilities, and strategies for achieving these aims. Head Start’s Performance Measures pertaining to the Family Partnership Agreement require that grantees work with parents to identify and access services and resources appropriate for each family’s interests and goals. Support services that should be identified and accessed include emergency assistance, intervention and employment services. Head Start’s follow-up with each family should ensure the “kind, quality and timeliness” of the services received through referrals.

Head Start agencies are required to take an active role in community cooperation among agencies to improve the delivery of services to children and families. Head Start’s Performance Measures emphasize that providing linkages to other service sources in the community, particularly child care, is a critical role for Head Start grantees. Head Start grantees are also required to partner with other agencies, rather than provide all services for Head Start families. The Head Start Family Partnership Agreement, “must take into account and, build upon where appropriate, information obtained from the family and other community agencies concerning preexisting family plans.”

³National Governors Association, “Working Out of Poverty: Helping Welfare Recipients Stay Employed,” 1998 and “Ancillary Services to Support Welfare to Work,” Mathematica Policy Research, 1998.

⁴There is no accepted definition of what constitutes support services. In this report, we use the set of support services used in the ASPE-funded, ACF-sponsored “Ancillary Services to Support Welfare to Work,” distributed to all attendees of ACF’s Welfare Reform Promising Practices National Conferences..

Temporary Assistance to Needy Families Requirements

Under PRWORA, States are required to “make an initial assessment of the skills, prior work experience and employability of each [TANF] recipient” and refer them to support services as necessary⁵. Each States’ TANF agency must decide if it wants to develop an individual responsibility plan for a particular recipient. In addition to setting forth an employment strategy for the recipient, the individual responsibility plan describes the specific services the State will provide to the family to enable the parent to acquire and maintain employment. Further, TANF agencies often contract with other community agencies to provide education, training, child care and transportation services for recipients.

Child Care Requirements

The CCDF block grant does not require child care programs or providers to assess family needs or offer additional services. However, the CCDF block grant does require States to coordinate the provision of child care services with other Federal, State, and local child care and early childhood development programs, particularly TANF, public health, employment services and public education. In recent years, many child care programs and Head Start programs have worked together to provide extended hour care and additional education and support services.

Other community-based child care programs may offer needs assessments and referrals. Child Care Resource and Referral Agencies (CCR&R) may provide assessments and referrals to families who receive CCDF-funded subsidies. While CCR&Rs do not provide direct child care services, many serve as the State-contracted voucher management agency. Nationally, CCR&R’s primary mission is to link parents to child care and promote universal access to quality child care. The CCR&Rs whose missions are defined by their communities, often serve a multi-dimensional role of promoting integrated supports to children and families. In addition, some social service agencies administer child care programs and may provide additional services to these families.

SCOPE

This report examines needs assessments and support services in these three programs in order to learn how to maximize efforts to help families reach and maintain self-sufficiency. We compared the needs assessments, referrals and provision of support services for families with children enrolled in Head Start programs, or who are TANF

⁵ Public Law 104-193, Sections 402(a)1(i) and Sec. 408(b)

recipients, or who use CCDF child care subsidies in the local communities we visited. We examined families' needs related to the following areas: child care, health promotion and treatment, mental health, nutrition, domestic violence, intervention services, emergency assistance and employment services. We also examined the coordination, referrals and linkages among Head Start programs, TANF agencies and child care programs relating to these needs and services.

We looked at families in poverty with children between 3 and 5 years old since they comprise 96 percent of Head Start families. We interviewed families with children in licensed and regulated child care settings who use CCDF funded child care certificates to pay for those services or fill a CCDF funded contracted slot.

METHODOLOGY

We made onsite visits to one community in California, Illinois, Nebraska, New York, North Carolina and Texas. We selected these States based on TANF caseload, Head Start enrollment, expert recommendation and geographic location. We selected individual sites based on a mix of urban, rural and suburban settings. We interviewed Head Start administrators and Family Service Workers and other staff at each Head Start site.⁶ In California, we visited two Head Start grantees. At each local TANF office, we spoke with directors, supervisory staff, and caseworkers. In New York, we visited two local TANF offices. At the CCR&R agencies, we interviewed a director or someone responsible for responding to parents' child care needs. At the child care providers, we interviewed the director. In Nebraska and Texas, we also interviewed directors of other social service agencies that conduct family needs assessments. In each State we visited, we interviewed directors or representatives from the State TANF and State lead child care offices.

⁶These Head Start employees may have different job titles at different locations. For the purpose of this report, we will refer to them as Family Service Workers. Likewise, we will refer to TANF employees, whose job function is to assess families' needs and refer families for services, as caseworkers.

We examined the available family files to determine if needs assessments had been completed, what action had occurred and if any coordination between agencies took place. In addition, we interviewed parents who were randomly selected from lists provided by the programs whose children are in Head Start, and/or who participate in the TANF program, and/or receive child care subsidies for their children. We interviewed a total of 77 families. We made our site visits in September and October 1998.

FAMILIES	
Head Start Only	29
TANF Only	8
Child Care Only	9
Head Start and TANF	11
Head Start and Child Care	7
TANF and Child Care	9
Head Start, TANF and Child Care	4
Total Families Interviewed	77

We did not examine any Early Head Start programs which is a separate program serving children ages 0-3 in full day, full year programs. We make neither national projections based on our case study sites nor rank individual Head Start grantees, TANF agencies or child care programs. Rather, our purpose was to gain an increased understanding of the needs assessment processes in these programs and to identify ways to improve their effectiveness in meeting families' needs for support services.

Our review was conducted in accordance with the *Quality Standards for Inspections* issued by the President's Council on Integrity and Efficiency.

FINDINGS

Head Start uses needs assessments to help low-income families move towards self-sufficiency

All seven Head Start grantees we visited administer an individual family needs assessment to determine the need for support services and provide a variety of referrals and services to families

Head Start grantees use different models to meet the objective of strengthening families through links with community services. After reviewing Head Start grantee assessment instruments, agency policy and procedures, interviewing Head Start parents, Head Start administrative and front-line staff, and reviewing available client files, we found that needs assessments vary in content, length and use. Assessments range from a one-page checklist of services to seven pages of detailed questions and probes. Variations between grantees in the procedures for using needs assessments include: how and when assessments are completed, who determines what action should be taken, if a referral will be made or a service offered on site, if referrals are written and documented in case files, and if follow-up is made.

Head Start grantees use information obtained from the needs assessments to identify services or workshops they can offer families or to provide referrals to community providers. In five of the seven grantees we visited, families complete the needs assessment on their own. The Family Service Worker (FSW) then reviews the assessment with the family, usually at the first home visit, and will make referrals for any needed support services. At the Illinois and New York Head Start grantees we visited, the FSW completes the assessment form with the family. At another grantee, the FSWs do not participate in the completion of the needs assessment, but that Head Start grantee uses the assessments to plan onsite workshops to meet families' needs.

To meet families needs, Head Start grantees make referrals to outside service providers and provide on-site services

Head Start referral processes differ by grantee in the manner a referral is made and documented. All of the Head Start grantees we visited give referrals to families in need of services. Head Start referral processes in the different grantees we visited include:

- informal information sharing between staff and families
- formal written procedures for documentation and follow-up

- the FSW calls ahead to service providers to verify availability of service for the families
- Head Start staff make group decisions regarding what services families should access.

In six of seven Head Start grantees we visited, FSWs determine which families should be given referrals for support services. Two of these six grantees (Illinois and Texas) report that the FSW, teacher, education coordinator and/or health coordinator hold “staffings” to determine referrals. Four Head Start grantees give the family a written referral, and two grantees make initial phone contact with the provider verifying availability of the needed service before referring the family. At one Head Start grantee, teachers provide referrals to families. Almost all of the Head Start grantees we visited indicate that they follow up on referrals. Another grantee we visited provides referrals and follow up exclusively on services for children.

While some Head Start grantees emphasize referrals to outside service providers, others elect to meet families’ needs through onsite workshops and services rather than through referring families to other community agencies. Families and staff at these grantees report that workshops are well attended. These grantees provide workshops on a variety of topics including those that families indicate on their needs assessment form are of concern to them.

Although they may provide effective ways to identify or address families’ needs, the various models of assessments, referrals and provision of services that we observed do not ensure that everyone’s needs are identified and resolved. For example, many Head Start grantees report that families often approach a teacher, rather than an FSW, with a problem or concern. Teachers may not be specifically trained to help families access services or make appropriate referrals.

Also, while most Head Start grantees we visited rely on FSWs to refer families to needed services, some Head Start grantees provide information to their families by giving them copies of community resource books. Though useful for some families, providing a list or book may not help families with low literacy levels or non-English speakers. Additionally, a resource book alone may not help families find the providers who can best meet their needs. Similarly, Head Start grantees that focus on providing workshops often do this in lieu of referring families to other community agencies. Consequently, families’ needs may not be individually addressed and services already available in the community may be duplicated.

Some Head Start grantees recognize the need to conduct the needs assessment later in the school year

Delaying the timing of assessing families' needs may improve the ability of Head Start grantees to effectively provide services. Historically, most Head Start grantees administer the needs assessment either during the Spring application period or at the beginning of the school year. According to most agency staff and families that we interviewed, some families need to establish trust before feeling comfortable expressing their needs. In response to this apprehension, beginning this year, Head Start families in the grantees we visited in California, Illinois and New York will complete the needs assessment later in the school year after relationships with Head Start staff are more established. In Illinois, the FSW will conduct the needs assessment and discuss the child's educational and developmental screening at the same time later in the school year.

Before the school year begins, families must complete large amounts of paperwork to enroll their child in Head Start and the needs assessment form may not hold importance to them at that time. A few families we spoke with who had a completed needs assessment in their Head Start file and/or who should have completed an assessment at the time of our interview, report that they do not recall filling out a Head Start form asking them about their family needs. Others report that they did not indicate needing any services when they filled out their form. Parents may not recall completing the needs assessment or appreciate how Head Start uses it to help them meet their needs. Consequently, the North Carolina grantee we visited encourages FSWs to focus more attention on the needs assessments form and process to make it more meaningful for parents.

The Illinois and North Carolina Head Start grantees we visited periodically reassess families for additional needs. These grantees regularly revisit the needs assessment at home visits and at other parent meetings. These additional visits are important because families' needs may have changed since the needs assessments were first completed, or families may not always indicate their needs on the assessment forms.

Nearly all Head Start families we interviewed report receiving information, referrals and some services from Head Start grantees

We found that low-income families enrolled in the Head Start program are more likely to have their needs assessed, be referred and access services than the families we interviewed receiving TANF or CCDF benefits. Head Start families we interviewed report receiving referrals and some services including transportation, child care, General Equivalency Degree classes or English as a Second Language classes, counseling services, and health care. One parent said she "loves Head Start because even though it's for children it helps parents." Despite these successes, some Head Start parents we interviewed need support services, but do not know that they can ask Head Start grantees for assistance as problems arise or that Head Start may facilitate access to services.

State and local TANF agency policies, as well as caseworker discretion, affect the needs assessments, referral processes and the provision of support services that help families reach and maintain self-sufficiency

The PRWORA legislation requires that TANF agencies make an “initial assessment of the skills, prior work experience and employability of each recipient,” and requires States “to conduct a program ... that... provides parents with support services to enable them to leave the program and become self-sufficient.”⁷ Most TANF agency policies indicate and staff respondents report that their focus is on assisting recipients make the transition from welfare to work. Consequently, in four of the seven TANF offices we visited, needs assessments and services provided to families exclusively focus on child care and transportation, and not other barriers to employment, such as emergency assistance (e.g., food, housing, clothing, and transportation), intervention (e.g., mental health, substance abuse, child abuse, and domestic violence), as well as employment services, child care, transportation and health care.

State and Local Policies

While five of seven local TANF agencies we visited have policies and procedures for assessing the needs of recipients, the methods by which they assess and the content of their assessments vary. At intake, most TANF recipients complete a brief skill and employability assessment and are asked if they have child care or transportation needs that would prevent them from holding a job. In four of the seven TANF offices we visited, caseworkers report they are not required to refer families to support services. In New York, the only referral obligation of caseworkers is to provide recipients with the names of two child care providers who have space available.

There is no assurance that families are asked about their need for services. In three TANF offices we visited, if a recipient identifies a domestic violence, substance abuse, or mental health problem, the caseworkers will refer them for professional treatment. But these services are “client driven,” i.e., referrals for services are determined by what recipients indicate rather than caseworkers probing for support services that families need.

Two TANF offices we visited in North Carolina and Illinois use needs assessment techniques similar to Head Start. Recipients undergo a detailed assessment which addresses a wide range of support services. In fact, North Carolina caseworkers go over a support services checklist with families every 6 months or at each meeting to determine if

⁷Public Law 104-193, Section 402(a)(1)(i)

family needs are being addressed. Illinois is implementing a new process where caseworkers will informally update the assessment at every meeting with recipients. No other TANF offices we visited reassess recipient's needs.

Caseworker Discretion

In Illinois, caseworkers not only provide recipients with referrals for a broad range of services, but can only make referrals to providers with whom they verify the providers availability to serve the recipient. Illinois caseworkers use a written referral form in triplicate with a copy for the caseworker, the family and the service provider. They also contact the service provider by telephone, note the action in the case file and follow up to see if the family received the services.

Some caseworkers we spoke with report they try to help meet recipient's needs on a case-by-case basis even though their State procedures do not require them to help families find services. In New York and California, caseworkers we interviewed report routinely using their own community lists and resources to help families access programs like Head Start and community food pantries. However, this is not agency protocol.

Recipient Responses

Twenty-three of thirty-two TANF recipients interviewed report that TANF caseworkers had neither assessed nor addressed their families' needs. Most recipients report that caseworkers did not ask them if they need any support services, nor did they inform them of any available services through TANF or in the community. One parent who needs housing, says that she "did not learn about any services from the TANF agency and didn't know they could help with services." Some recipients have seen multiple caseworkers and did not know who they should contact to ask for help. Of the TANF recipients we interviewed who had been assessed, some were given referrals from their caseworkers. Most of these recipients found this information helpful.

In some cases recipients face problems accessing needed services when services relate directly to employment. In New York, one recipient says her TANF benefits stopped when the transportation subsidies she needed to get to work never materialized, causing her to lose her job. Another recipient reports that she was "only told about job training." When she asked her caseworker for help with transportation she "was told to call 411 (the directory assistance phone number)." Most families do not know if they can get information about community resources and services from their TANF office. A few caseworkers we interviewed report that they are not trained well enough to help families with the types of problems that arise.

Individual child care programs do not assess family needs. Child Care Resource and Referral agencies are not required to assess family needs, but some may make informal assessments and refer families to needed services

Neither Federal nor State law require that families using CCDF child care subsidies be assessed for needs beyond child care or offered additional services. In addition, CCDF does not provide specific funding for family needs assessments. None of the child care providers we visited administer needs assessments to their families. These child care providers do not consider it their responsibility to help families access support services. The child care directors we met with report little, if any, contact with community agencies. Further, most child care staff we interviewed know little about community services and do not routinely refer families to community services. One director reports that she “assumed that families would get information from public aid.”

However, one child care director we interviewed espouses views similar to Head Start’s philosophy. He believes that in order to educate children, he must help their families access services. Along with other respondents, he feels:

Families have lots of problems accessing services. They don’t even receive child care subsidy information from the welfare office and don’t know they are available. Families are intimidated to ask welfare caseworkers for help.

Some low income families may get referral assistance for support services if they make their families’ needs known when they call a CCR&R for child care information. The CCR&Rs we visited report that other family needs may emerge when determining eligibility for subsidized child care or when providing child care information. These CCR&Rs will help families access needed services beyond child care, like family counseling, emergency services, transportation, education and job training. Many CCR&R staff report families’ awareness of community resources and services is scarce.

The Head Start, TANF, Child Care Resource and Referral and child care programs we visited do not coordinate around individual families’ needs assessments. However, in some sites we visited, these agencies will make referrals to other agencies and frequently work together on community issues

Coordination of families' needs assessments between agencies has not yet evolved

The welfare reform legislation that created TANF “affects not only needy families, but also intergovernmental relationships....It transforms the way agencies do business, requiring they engage in genuine partnerships with each other.”⁸ Although they all serve low-income families, some of whom are the same families, none of the Head Start, TANF, and child care providers we visited coordinate around an individual family’s needs.

Federal guidance on coordination around families’ needs is unfocused. Head Start performance standards require that the Family Partnership Agreement consider and build on any other family plans from other community agencies. However, only two of seven Head Start grantees we visited ask families if they have plans or agreements with other agencies. There are no specific Federal requirements that TANF offices or individual child care programs coordinate around individual assessments. The Child Care Bureau believes that State and local child care planning should promote comprehensive services to families by linking child care to critical services like health, family support services, employment services, transportation, housing, etc. State Lead Child Care agencies are required to coordinate the provision of services with other programs including TANF and early childhood developmental programs.

Very limited progress towards coordinating around families’ needs assessment has begun in some agencies. In North Carolina, a Head Start respondent said they are developing a written agreement with the TANF agency to share information on families’ needs assessments. The North Carolina TANF director indicated that they had considered including the Head Start Family Support Workers in their staffings to discuss families’ needs. In Nebraska, Head Start grantees met once with the State TANF agency to suggest coordinating around families’ needs assessments, but no agreement resulted from this meeting. Two Head Start directors we met with indicated a willingness to coordinate with other agencies on needs assessments, but are unsure how to proceed.

Not everyone agrees that agencies should exchange information on individual family’s needs. Some workers feel that confidentiality issues prohibit sharing of data between agencies. One Head Start FSW said that it is not her job to discuss referrals with the welfare office and job services. Other respondents fear that staff in other agencies may not be knowledgeable about where to refer families for services or trained to assess family needs. Some Head Start employees believe they (or their contractors) can provide better service to families at the Head Start site, rather than referring families elsewhere for some services.

⁸Preamble to final rule, 64 FR17722.

Lack of coordination may affect families' access to resources

Although Head Start, TANF and CCR&R agencies have different missions, they share a goal of helping families toward self-sufficiency. The absence of coordination around a family's needs assessment may hinder a family's ability to become self-sufficient. For example, one social service agency respondent reports that, in order to receive services, families may promise different things to different agencies on family partnership agreements or responsibility plans. These agreements or plans may pose conflicts and/or confuse families regarding deadlines and priorities. Moreover, agencies may penalize families for failing to live up to the terms of their contracts and agreements.

Communities we visited varied in the extent of support services available to low-income families. In communities without many services, the lack of coordination between agencies may strain finite resources, decreasing the likelihood of families finding and accessing services. In contrast, in communities with more resources, duplication of services may result from a lack of coordination between Head Start, TANF and child care programs. One Head Start grantee we visited, for example, offered on-site services instead of referring families to other community agencies which provide the same service. Two additional respondents in other States were concerned about their agencies offering the same services that other community providers offered.

In some communities that we visited, Head Start, TANF and CCR&R agencies communicate on matters not directly related to individual families and their needs assessments

While there is no sharing of information on individual families' needs, most Head Start, TANF and CCR&R staff routinely refer clients to each other's agencies and some inform other agencies of a family's participation in their programs. Almost all Head Start grantees we visited ask families if they access services at other community agencies. In Illinois the TANF agency provides some Head Start grantees with lists of TANF participants in nearby zip code areas, allowing Head Start to target their recruitment efforts. In California, TANF caseworkers visited Head Start grantees to inform staff and parents about welfare reform changes. Also in California, Head Start recruitment information is sometimes included with welfare checks.

At some sites we visited, we found that numerous formal and informal agreements exist between agencies, including referrals from health services, child welfare, substance abuse, domestic violence and food pantries. In Nebraska, the TANF office we visited contracts with 11 local hospitals to take Medicaid applications for emergency room patients, assess their needs and refer them to appropriate agencies for social services. In North Carolina, Smart Start is a community partnership aimed at better preparing young children to enter school and is comprised of representatives from agencies such as Head Start, the

Department of Social Services, and local health and mental health agencies.

Head Start, TANF and CCR&R management staff often serve on community planning councils and interagency boards and workgroups, both locally and at the State level. To overcome some of the problems created by the lack of coordination, some multi-agency partnerships evolved in some communities that focus on particular community needs. In these instances, agencies sharing common goals are working together to serve children and their families. However, these councils, boards and workgroups do not resolve all interagency communication and coordination issues. One respondent states that the existing councils and projects are “excellent networking vehicles, but none have broken through to a collaborative effort [because]... agencies are afraid of losing their identity. Dwindling resources make us come together to work together. But some [agencies] are also competing for [clients].”

OPPORTUNITIES FOR IMPROVEMENT

Though they serve many of the same low-income families, Head Start, TANF and child care programs vary substantially in the extent to which needs are assessed and addressed. Both Head Start grantees and TANF agencies are required by law to assess families' needs and provide families with support services. We found that families enrolled in the Head Start program are more likely to have their needs assessed, be referred to and access services than families receiving TANF or CCDF benefits. Needs assessments can be an important tool in determining what services families need in order to become self-sufficient.

Since the enactment of welfare reform, States have reduced welfare caseloads substantially. States' efforts, as well as a healthy economy, have enabled many TANF recipients to find employment and work towards self-sufficiency. As economic conditions change or the pool of easier-to-serve clients diminishes, all three agencies will face greater difficulties in serving families trying to reach or maintain self-sufficiency. We have identified promising practices to encourage agencies to begin developing more effective means to assess and address the needs of low-income families, including the coordination of services to maximize the resources that enable families to realize self-sufficiency.

The Administration for Children and Families could further explore strategies that encourage and facilitate coordination between agencies around needs, referrals and provision of services for families

The ACF could address current issues involving the coordination of families' needs, referrals and provision of services and anticipate future trends that may require additional interagency coordination. Coordination around families' needs between Head Start, TANF and child care programs, as well as with other community social service agencies, will become increasingly important in providing needed services to families working towards self-sufficiency. Agencies will face increased demands on their resources, both in the numbers of families needing services as well as the extent of their needs.

Head Start, TANF and child care programs may benefit by coordinating with other agencies based on families' needs. Coordination may allow for increased awareness of existing community services, more efficient use of resources, and reduced duplication of

services. Further, coordination may permit agencies to specialize their services. The ACF could devise methods to provide ongoing guidance and support to State, local and community agencies delivering services to low-income families. Specific steps ACF could take include:

- developing technical guidance addressing broad conceptual issues such as confidentiality, jurisdiction, and information sharing,
- convening regional or national conferences highlighting the best coordinating and communicating practices among agencies,
- disseminating best practices detailing the use of existing avenues for communication and coordination. Planning commissions and/or interagency workgroups exist at every site we visited. These entities provide many opportunities to resolve differences and share information on common and cross-cutting issues.

The Administration for Children and Families could encourage Head Start grantees, TANF offices and child care programs to increase parent awareness about the resources they and other community agencies provide

We found that families in all three programs lack knowledge about available services and are uncomfortable expressing their families' needs. Many parents do not know where to find needed services or that Head Start, TANF offices and child care programs are potential resources that may help them identify available support services. Further, families indicate that they are often reluctant to make their needs known or pursue needed services.

In order to meet Head Start, TANF and child care program goals and objectives relating to these families, there is value in enhancing needs assessments, referrals and provision of services. While we recognize that each program has specific missions and relates to States and grantees in different ways, these programs and missions converge around low-income families trying to reach and maintain self-sufficiency. We suggest that ACF encourage the following promising practices to increase parent awareness and access to services through Head Start, TANF and child care:

- Complete the needs assessment at intake or eligibility determination and periodically measure family progress. This may ensure that previously indicated needs, as well as emerging needs, are met. In addition, families may be more

comfortable expressing their needs as they become acquainted with a family service worker or caseworker.

- Include questions on the needs assessment regarding what other agencies and services families are currently accessing. This may allow agencies to avoid duplication of services and conflicting service plans, as well as to facilitate the coordination of resources.
- Increase staff and program awareness of available support services in the community through training, interagency information exchange and common resource books.
- Include questions on the needs assessment that address general community needs. This may encourage families inhibited from expressing their personal needs to come forth with their problems and may help programs devise applicable workshops.
- Sponsor on-site workshops and services for families if not accessible elsewhere in the community.
- Establish formal referral processes and follow-up procedures to improve accountability of both staff and families.
- Develop a comprehensive assessment tool for CCDF voucher management agencies. Needs assessments may be an effective way for CCR&Rs and child care programs to gain greater knowledge about the needs of their families and to develop strategies toward linking families with appropriate services.

In addition to these opportunities for improvement, there is one other area that the Office of Inspector General (OIG) will evaluate. Since both agency and family interviews indicated that in most of the TANF agencies we visited, needs assessments and referrals to support services are not regularly being offered, the OIG will examine the degree to which States are complying with the law requiring them to “make an initial assessment of the skills, prior work experience and employability of each [TANF] recipient” and “to conduct a program ... that... provides parents with support services to enable them to leave the program and become self-sufficient.”

AGENCY COMMENTS

In their written comments, ACF wanted to distinguish between their legal authority to require State compliance and their encouragement for States to move in directions viewed as model practices. They also wanted to document certain actions they had already taken to address some of the underlying concerns expressed in our report. The full ACF comments are contained in the Appendix. Where appropriate, we changed the report to reflect their comments and concerns.

We recognize that the nature of the relationship between ACF and the States has significantly changed since PRWORA was implemented. The ACF's primary role is to ensure States' compliance with TANF and CCDF regulations, while PRWORA gives the States unprecedented authority to administer the programs according to their own policy choices. The State's TANF programs that have emerged are in various stages of development. States are still experimenting with ways to meet the PRWORA goals of reducing welfare dependency and helping participants reach and maintain self-sufficiency.

We agree with ACF that the nature, mission and goal of each State's TANF program is not centered on family assessments. We further agree with ACF that TANF does not require States to enter into an individual responsibility plan with their clients. Our intent in the report is not to become overly focused on a certain kind of formal needs assessment, but rather to meet the self-sufficiency needs of low-income parents and families served by these three programs. In order to help clients become self-sufficient, States first have to know what needs have to be met. In reviewing case files and discussing individual parent and family needs, we did not find, for the most part, that needs were being appropriately identified, either in a formal or informal way. Therefore, we have maintained our first suggested action but deleted the word "assessment" to avoid the impression we are encouraging TANF agencies and Child Care programs to conduct the same type of formal assessments as Head Start grantees.

The ACF supports the concept that all child care providers have information on community resources to assist families with assessments. We agree that many child care providers are not trained to do the assessment themselves, nor that they have sufficient resources to hire support service staff. However, we did not find examples of child care programs or State agencies in the sites we visited which emphasize linking families to community services which can provide assessments or needed services. We believe further attention should be focused on ensuring that parents receiving subsidized care have access to information about community resources.

The ACF stated that some collaboration among these three programs takes place. We support this collaboration. We emphasize that focusing local-level collaboration around identifying and providing for families' needs remains an opportunity for improvement. If families participate in two or three of these programs, local-level coordination can ensure a more focused plan for individual families and improve the efficiency of resource utilization.

Finally, as welfare caseloads continue to drop, States are increasingly looking for ways to help remaining recipients make the transition from welfare to work. Many of the recipients remaining on the rolls face myriad personal and family problems which may hinder rapid employment and long-term attachment to the labor force. Appropriate identification of needs can enable States to provide or refer recipients to the services which will help facilitate a successful transition to employment and self-sufficiency.

The Office of the Assistant Secretary for Management and Budget also commented on the report. They conceptually agree with the report, but point out that limited funding and the reduced Federal role in welfare administration may hamper the coordination efforts we recommend.

**Administration for Children and Families
Comments on the Draft Report**



DEPARTMENT OF HEALTH & HUMAN SERVICES

ADMINISTRATION FOR CHILDREN AND FAMILIES
Office of the Assistant Secretary, Suite 600
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Washington, D.C. 20447

July 30, 1999

TO: June Gibbs Brown
Inspector General

FROM: Olivia A. Golden *Olivia A. Golden*
Assistant Secretary
for Children and Families

SUBJECT: Comments on the OIG Draft Report: "Head Start, TANF and Child Care
Needs Assessments" (OEI-05-98-00540)

Attached are the Administration for Children and Families comments on the OIG Draft Report: Head Start, TANF and Child Care Needs Assessments. If you have any questions, please call Frank Fuentes, Acting Associate Commissioner, Child Care Bureau, at 401-7256.

Attachment

COMMENTS ON THE ADMINISTRATION FOR CHILDREN AND FAMILIES ON
THE OFFICE OF INSPECTOR GENERAL'S DRAFT REPORT ON "HEAD START,
TANF, AND CHILD CARE NEEDS ASSESSMENTS" (OEI-05-98-00540)

The Administration for Children and Families is pleased to have the opportunity to provide comments to the Office of Inspector General's draft report entitled "Head Start TANF and Child Care Needs Assessment" (OEI-05-98-00540). The rules of the Child Care and Development Block Grant require that States collaborate with public education, public health, TANF and employment services. The Child Care Bureau and the Head Start Bureau have been working collaboratively toward the goal of providing full-day/full year services for children and their families. Work that has been done at the Federal level includes the establishment of the National and Regional Head Start/Child Care Workgroup. In 1997, Olivia Golden, then ACYF Commissioner, established a Head Start/Child Care Workgroup. The Workgroup was established in response to an ACF priority goal to provide responsive full day/full year, quality, comprehensive, affordable and available services for children and families. The Workgroup consists of members from the Central and Regional offices of Head Start and Child Care and supports strategies that can assist the Regions and States in combining resources. At a National level, the Head Start and Child Care Bureaus have sponsored several joint efforts that include National Leadership Forums on Infant and Toddler Initiatives; Blended Funding Resources; Family Child Care and Fiscal and Licensing issues. The forums are geared to State Child Care Administrators and other leaders in the Head Start, early care and education communities.

This report presents an analysis of interviews and reviews of case files, policies and procedures of Head Start grantees, TANF agencies and Child Care providers in six communities, as well as with their State offices. Interviews of 77 parents or guardians of young children receiving Head Start, TANF and/or CCDF subsidized child care were made. The purpose of the study was to describe efforts to assess family needs and provide support services to Head Start and TANF families or who receive Child Care and Development Fund child care subsidies, and to determine what coordination around families' needs exist among agencies serving these families. A summary of the findings and opportunities for improvement are contained in the report. These findings are particularly about child care programs and Child Care Resource and Referral agencies.

General Comments

We recommend that the paragraph below be substituted for paragraph #2 in the background section:

"The passage of the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996 repealed a number of child care programs and created a single integrated Child Care and Development Block Grant for low income families. Program goals include: promoting parental choice, encouraging

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States to provide consumer education to parents, and helping States implement health, safety, licensing and registration standards.”

We also recommend that the last sentence of the same paragraph read: “States use these funds to enhance the quality of child care programs and to reimburse programs for serving eligible families or providing parents with child care certificates or vouchers to purchase child care.”

We want to comment that we do not view child care as a support service simply to help low income families overcome barriers to employment such as emergency assistance, etc. We believe that child care is education and a quality care setting is essential for healthy child development to occur.

Additionally, the statement that individual child care programs do not assess family needs is not a totally accurate statement. It would be more correct to say “some” child care programs do not assess family needs. It should be noted that there are no requirements nor funds provided for family assessments in the Child Care and Development Fund (CCDF) program. Therefore, many child care providers are not trained to do the assessment themselves nor do they have the resources to hire support service staff such as social workers. Yet many child care programs provide information about the community resources and often make the linkages for the parents. The Child Care Bureau would support the concept that all child care providers should have information on community resources to assist families with referrals.

The OIG recommends (page 3) that the Head Start, TANF and child care agencies coordinate their programs. It should be noted that indeed there is collaboration among those three programs that takes place, but due to the nature, mission and goals of each program, it is not centered on family assessments.

We support the idea that the point of eligibility determination is where the assessment should be done. The appropriate site for this type of assessment is a question to be explored with the States since it may be occurring in the case management process, but not at the local level, as it does with the Head Start. Consequently, the recommendations on this issue should reflect the different structures and expectations of each program.

Requirement for Support Services:

The “scope of work” defined on page 8 states that “This report examines needs assessments and support services in these three programs in order to learn how to maximize efforts to help families reach and maintain self-sufficiency.” However, the content of your report seems to reflect your view that TANF and Child Care should be conducting assessments at least as extensive as Head Start and that the services that they provide or make available should be as exhaustive as Head Start as well. The statutory

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language governing assessments for TANF found in Section 408(b)(1) of the Social Security Act states:

“(1) ASSESSMENT - The State agency responsible for administering the State program funded under this part shall make an initial assessment of the skills, prior work experience, and employability of each recipient of assistance under the program who-

- (A) has attained 18 years of age; or
- (B) has not completed high school or obtained a certificate of high school equivalency, and is not attending secondary school.”

The language governing Individual Responsibility Plans follows in Section 408(b)(2):

“(2) CONTENTS OF PLANS -

(A) In general - On the basis of the assessment...with respect to the individual, the State agency, in consultation with the individual, may develop an individual responsibility plan for the individual, which

- (iv) describes the services the State will provide the individual so that the individual will be able to obtain and keep employment in the private sector, and describe the job counseling and other services that will be provided by the State; and
- (v) may require the individual to undergo appropriate substance abuse treatment.” (Emphasis added)

While we agree that comprehensive assessments that take into account all of the family members' needs can be a very effective tool in identifying needed services, we do not agree with your statement on page 20 (first paragraph) that “Both Head Start grantees and TANF agencies are required by law to assess families needs and provide families with support services.” (Emphasis added.) Under TANF, the Individual Responsibility Plan is optional. States are required to provide “parents” with “support services to enable them to leave the program and become self-sufficient.” (Section 401(1)(A)(i)). However, the statute does not define the support services States must provide or require assessments of family needs. Your report has adopted a very broad definition of support services.

Generalization:

Although the OIG team only visited 6 offices, statements such as the one on page 6, “Support services to help families attain self-sufficiency are lacking in most cases,” imply that TANF offices as a whole are not providing any support services. First, we know that many offices do offer an array of services, conduct broader assessments, and refer families to other services. Second, it denigrates all of the work that States

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do to help families move to work. And, third, while finding a job does not equate with self-sufficiency in all cases, in many cases it does. Clearly, it is a huge step in that process and one that seems to be minimized in your report. Your note at the bottom of page 9 in Methodology about not making national projections is not adequately conveyed in the rest of your report.

Assessment Tools:

Many of the assessment instruments (and those that the report seems to describe) focus on "shortcomings or barriers" rather than strengths. The Work First Model (that many States have adopted) emphasizes letting the marketplace "test" or "assess" clients. Clearly in the hiring process, some client's personality and drive overcome major shortcomings; while some, who have good credentials, still cannot get employed. While agencies trying to find all of the problems is one strategy for helping families, focusing on strengths, responsibility and self-advocacy is another approach that has been used successfully.

Specific Comments

Page 17, footnote 7 - Since the Final Rules are now published, you may wish to cite the Final Rule rather than the NPRM.

Page 20, Technical Assistance - We agree that more work needs to be done with regard to collaboration and coordination of services. It is a subject that we try to use every opportunity to promote. Over the past year, ACF sponsored five Promising Practices conferences throughout the country, highlighting best practices, including those with a focus on community outreach and collaboration, substance abuse, depression, mental health, domestic violence, learning disabilities, child care, urban and rural transportation, and many more. They were very well attended by a variety of agencies and groups that work with welfare recipients, including child care providers and Head Start grantees. Overall attendance ranged from 300 to 500 for each conference.

We also devoted one of our monthly Family Independence Forums to "TANF and Head Start Collaboration." The focus of the forum specifically addressed family needs, encouraging coordination and collaboration between Head Start and TANF agencies. These forums are interactive discussions and that are lead by either experts in the field or practitioners who operate programs that are recognized as successful or promising. In this case, our discussion leaders included Head Start Collaboration Directors from two States and a Head Start Director. Attendance in these these video/audio conferences generally includes a variety of participants from 25 to 30 States.

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ACF created the Peer Technical Assistance network to enable States and local TANF officials to exchange information and to conduct on-site visits to model programs. The overarching goal of the Peer Technical Assistance network is to highlight promising programs, promote the exchange of information on successful programs, and to provide "hands-on" technical experience - all in the context of assessing families' needs and bringing those services together in a coordinated manner. Issues surrounding child care have been a priority for States and Head Start is always included as part of that discussion. Please see our web site at <http://www.calib.com/peerta/>.

In addition, ACF is providing funding, through 16 grants, to promote intensive joint planning activities at the local level that would reinforce the concept of the temporary nature of welfare and promote self-sufficiency and employment. These grants provide local communities seed money to convene planning meetings to develop alternative methods to reduce welfare dependency, facilitate partnership building and strengthen community support for families in need.

Finally, because we believe "that no family be left behind" in the successful move to self-sufficiency, we have devoted resources to addressing the needs (with an emphasis on child care needs) of children with disabilities. The Administration on Developmental Disabilities (ADD) in ACF has targeted a significant portion of its funding to their Projects of National Significance to develop and establish a national Family Support Program for families of children with disabilities. These grants allow States maximum opportunities for systems change through the collaboration with and strengthening of generic community action service organizations (including child care agencies) in order to ensure the provision of family support to families of children with developmental disabilities.

Additionally, these programs allow the establishment or utilization of a State policy council to assess the needs of children with disabilities and their families and provide a comprehensive statewide system of family-centered supports. While statewide systems help ensure the availability of services, the assessments and coordination of services are focused on the individual family needs. These projects address the needs of children from families participating in State's TANF, welfare-to-work, and/or SSI program, veterans with families having children with disabilities, parents with cognitive disabilities who have children, and adoptive/foster families of children with disabilities.