



## Temporary Assistance for Needy Families Program — Research Synthesis Brief Series

# TANF Child-Only Cases

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- 59 percent of child-only TANF units include ineligible parents; children living with nonparental caregivers, usually grandparents, make up 41 percent.
- The intersection between TANF and child welfare policies is critical since evidence suggests that from one-third to one-half of children in nonparental child-only units have had some contact with child protective services.
- The subgroups of parental child-only TANF cases are distinct and point to the need for tailored solutions.
- The evidence, while limited, suggests that these children are at risk, yet their families receive few services.

**A**lmost half of Temporary Assistance for Needy Families (TANF) cases are “child-only cases,” which arise when no adult is included in the benefit calculation. This exclusion can happen if children live with relatives (or, in some states, specified nonrelatives) instead of with their parents or if parents are ineligible for TANF for certain reasons other than income.<sup>1</sup> Despite their large share of the TANF caseload, child-only cases have generated little research relative to cases with adult recipients. This brief reviews the limited evidence available, including how child-only cases arise, their number and characteristics, children’s well-being, available services, and implications for policy and research. Table 1 shows references for all state and county studies.

### How Do Child-Only Cases Arise?

There are two broad categories of child-only cases: those in which no parent lives in the household (which we call nonparental child-only cases) and those in which a parent does live in the household but does not qualify for TANF for certain nonfinancial reasons (parental child-only cases). Some of these nonfinancial reasons are common to all or most states and others are state-specific.

#### Nonparental Cases

Nonparental child-only cases typically arise in situations of serious parental problems, represent long-term living arrangements, and may follow a family’s child welfare involvement or occur in lieu of formal involvement with the

Almost half of TANF cases are “child-only cases,” which arise when no adult is included in the benefit calculation. Despite their large share of the caseload, child-only cases have generated little research.

Table 1. State Studies focused on Child-Only TANF Cases

AUTHOR	LOCATION	DATA	SAMPLE	SAMPLE SIZE
CBER (2006)	Tennessee and Davison County, TN	Monthly administrative Families First records	Nonparental caretaker child-only cases active in October 2005	10,277
Edelhoch et al. (2002)	South Carolina	Administrative data plus telephone interviews during the spring of 2001	Nonparental caretaker child-only cases active in February 2001 with at least six consecutive months on the rolls	443 in data; 334 interviewees
Gibbs et al. (2004)	Louisiana, Maryland, Oklahoma, Washington, and Wisconsin	Randomly selected record review in one county per state: TANF reports, TANF service manuals, or case management information	Nonparental caretaker child-only cases	Not reported
Hetling et al. (2005)	Maryland	A variety of administrative data systems	Child-only cases active in October 2003	9,208
Lieberman et al. (2002)	San Mateo and Santa Clara Counties, CA	Interviews in the summer and early fall of 2001	Child-only cases active in February 2001 excluding SSI, nonneedy caretaker relative, and sanctioned cases	750
Mauldon et al. (2010)	San Francisco	Interviews between March and June of 2010 by phone or in person	English-speaking SSI child-only cases	60
Speiglmán et al. (2007)	Alameda, Humboldt, San Francisco, San Mateo, Santa Clara, Sonoma, and Stanislaus Counties, CA	County administrative data	Child-only cases active between November 2006 and February 2007	25,668
Wood and Strong (2002)	New Jersey	A survey during June and July of 2001 plus in-depth follow-up interviews with a small subset of respondents	Child-only cases active in April 2001	524

child welfare system. Common reasons for parental absence in a New Jersey study included substance abuse, mental health problems, and incarceration. Large majorities of nonparental TANF caregivers in South Carolina (91 percent) and Tennessee (79 percent) report that the arrangement is permanent, and analysis of the Survey of Income and Program Participation finds that 94 percent of children in TANF families living without a parent continue to live without their parents two years later.<sup>2</sup> Researchers synthesizing national data and interviewing service providers and relative caregivers in five states conclude that “many children enter informal kinship care as a result of circumstances that could justify child welfare involvement.”<sup>3</sup> In Maryland, half of children in nonparental child-only cases had prior substantiated or indicated child protective services (CPS) involvement compared to about 3 in 10 for other child-only cases. In South Carolina, 35 percent had prior CPS involvement (though not necessarily substantiated). A recent study by the U.S. Government Accountability Office (GAO) found that one-third of nonparental cases in Texas included children who were in state custody (that is, not only substantiated but removed from parents’ custody), while in Washington, only 12 percent had CPS involvement.<sup>4</sup> While it is extremely difficult to compare administrative CPS data with national surveys of harm from maltreatment, the data available suggest that these rates are extremely high (about 2 percent of all low-income children experienced harm from maltreatment in 2009).<sup>5</sup>

Both TANF and child welfare policies affect the incidence of nonparental cases. State TANF programs determine under what circumstances children’s caregivers can be eligible for TANF, whether to include the caregiver’s income and resources when determining eligibility for child-only cases, who is included in the assistance unit, and the payment amount.<sup>6</sup> Child welfare rules and practices are complex,

varied across states, and hard to summarize briefly. However, they generally determine whether a relative caregiver can receive a non-TANF subsidy as a fully licensed foster parent, and influence whether such caregivers choose to become foster parents or instead care for the child without child welfare or court involvement and seek TANF support. The interactions between TANF and child welfare policy are even harder to summarize across states and may be influenced by informal practice as well as formal policy.<sup>7</sup>

Children living with relatives other than their parents are eligible for TANF in all states. In Wisconsin, the child can receive child-only benefits while living with relatives only if living with the biological parents would place the child at risk of harm.<sup>8</sup> States define which relatives can be eligible, and about one-quarter count children living with an unrelated caregiver (usually only a legally appointed guardian) as eligible.<sup>9</sup> Federal TANF rules do not require states to impose work requirements or a benefit time limit on nonparental caregivers, but they may choose to do so.<sup>10</sup> Most states do not count the income of nonparental caregivers, but recent studies identify four that do (Arizona, Oregon, Nevada, and Washington).<sup>11</sup> Louisiana does not exclude caregivers based on income but provides a higher benefit for certain lower-income caregivers.<sup>12</sup>

Federal and state child welfare policies affect the formation of these TANF cases by determining under what circumstances kin can be formally licensed as foster parents and receive full foster care subsidies. If a kin caregiver receives a full foster care subsidy for a child, that child would generally be ineligible for TANF since the foster care payment level is high enough to place a child over the TANF income limit.<sup>13</sup> In addition, child welfare policies also determine whether kin can receive a subsidy to care for a child permanently, as permanent guardians or as adoptive parents. This likely makes the child ineligible for TANF

child-only benefits, because the subsidy is too high or because after adoption the case is no longer a child-only case.<sup>14</sup> Finally, child welfare policies and practices affect whether kin are sought when child maltreatment is identified and whether they are encouraged to keep their role informal (and are likely referred to TANF for financial support) or are asked to be formal, licensed foster parents.

The ongoing changes in child welfare policies regarding kin make fully documenting current interactions between TANF and child welfare nearly impossible. After the 1997 Adoption and Safe Families Act,<sup>15</sup> federal regulations made clear that states should license kin using the same standards as nonrelative foster parents. At the same time, child welfare demonstration authority<sup>16</sup> allowed states to experiment with subsidized guardianship so relative caregivers could make a lifetime commitment to children and receive financial support without parental rights being terminated.<sup>17</sup> Building on these demonstrations, the Fostering Connections to Success and Increasing Adoptions Act of 2008<sup>18</sup> allowed states to opt in to creating statewide guardian assistance programs for kin (as defined by the state), with federal support to operate the programs.<sup>19</sup>

However, despite an overall trend toward licensing a larger proportion of relative caregivers, state licensing practices still vary greatly. A five-state study reports one state licenses virtually all kin caregivers and uses TANF primarily as support during the process, while another licenses only about 10 percent of these caregivers.<sup>20</sup> A GAO survey found that 12 states (of 43 responding) said that all relatives caring for children in state custody were licensed, while 10 states said that fewer than 15 percent were.<sup>21</sup>

Researchers have not found a clear answer to whether changes in child welfare policy toward relative caregivers affect TANF child-only caseloads. GAO concludes that it is too early to assess the potential impact of the

subsidized guardianship option. However, one GAO site visit identified changes that could lead to a future effect: Texas child welfare workers told GAO that in contrast to the past, they now encourage relative caregivers to become licensed, to take advantage of subsidized guardianship. Researchers caution that some kin caregivers may choose not to approach the child welfare system, even with better state outreach, because they fear losing custody of the children or because they may not be able to meet licensing standards.<sup>22</sup>

Only one study sheds light on the effects of past child welfare policy changes on TANF child-only caseloads. Comparing three waves of the National Survey of America's Families, researchers concluded that children living with kin were far less likely to be poor in 2001 than in 1997 or 1999, and that one reason could be more kin receiving higher benefits, such as foster care, instead of TANF. However, the data did not allow researchers to distinguish fully among these benefits.<sup>23</sup>

### Parental Cases

The three primary causes of parental child-only cases—Supplemental Security Income (SSI) receipt, immigration status, and program rules that cut the parent from the case—arise from different circumstances.

**SSI parents.** SSI is a federal benefit for low-income elderly persons and persons with severe disabilities. SSI provides a higher benefit than TANF and is largely financed by the federal government, making SSI potentially advantageous for states and recipients. Most states now have administrative procedures to support SSI applications for TANF parents and children with disabilities.<sup>24</sup> In general, parents with SSI benefits are ineligible for TANF but may apply for child-only benefits without counting their own incomes, depending on state eligibility criteria.<sup>25</sup>

**Immigrant parents.** The 1996 Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) framed state policy choices regarding immigrants' TANF

eligibility. PRWORA barred many authorized immigrants from receiving federal TANF benefits (unauthorized immigrants were already ineligible) and other federally funded benefits during the five years after arrival in the United States. States' TANF choices include whether to provide state-funded benefits for authorized immigrants who immigrated after the enactment of PRWORA during their five years of federal ineligibility, and whether to provide state-funded assistance to other ineligible immigrants, both authorized and unauthorized. These federal and state policies in turn might affect whether households with citizen children of immigrants receive assistance as child-only cases or through state-funded programs that include adults in the household. State program rules may also affect immigrant families' knowledge about eligibility and their comfort in applying. State coverage for immigrants varies considerably: 22 states fund cash assistance programs for immigrants ineligible for federal TANF benefits, but eligibility varies from all legal immigrants in California to only protected statuses in Florida.<sup>26</sup>

**Other ineligible parents.** States may apply a partial sanction for noncompliance with TANF requirements that removes the adult from the case and allows the children to receive benefits, making the case child-only. This flexibility received attention from Congress in the Deficit Reduction Act (DRA) of 2005, which required states to include these parents in the work participation rate.<sup>27</sup> Following this legislation, six states shifted from partial to full family sanctions; in at least one of these states, a subsequent decline in child-only cases may be related.<sup>28</sup> By 2010–11, only California and New York maintained a sanction policy that cut just the adult portion of the benefit as the most severe penalty for noncompliance.<sup>29</sup>

Child-only cases may also arise when parents lose TANF eligibility for welfare fraud, a drug conviction, or a time limit.<sup>30</sup> For example, California and other states terminate only the adult's benefits when a case reaches the

state's lifetime limit.<sup>31</sup> Federal regulations indicate that states cannot convert an assistance unit to a child-only case after reaching the 60-month limit but could convert the case before that time.<sup>32</sup>

### How Many TANF Cases Are Child Only?

In 2009, child-only cases made up almost half of the national TANF caseload. In recent years, the number of child-only cases nationally has grown slightly; the share of TANF caseload has grown more substantially because of the decline in TANF cases with a parent present. Half of states saw an absolute increase in child-only cases between 2002 and 2009.<sup>33</sup>

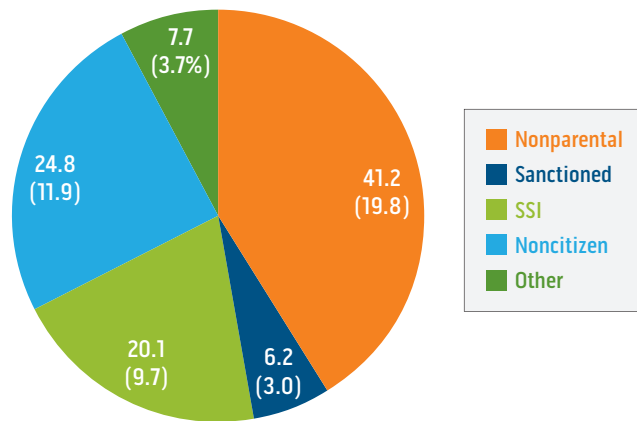
Nonparental cases made up 41 percent of all child-only cases in 2009, representing about one in five of all TANF cases (figure 1). Parental cases made up the remaining 59 percent.<sup>34</sup> In about 20 percent of all child-only cases, parents received SSI, 25 percent did not qualify because of immigration status, 6 percent were sanctioned, and 8 percent lost benefits for other reasons.

The distribution of child-only cases by type varies dramatically across states. Nonparental cases make up less than 15 percent of the child-only caseload in California but over 98 percent in Idaho. Eight states report less than 1 percent of their child-only cases are due to SSI, but in Rhode Island it is 60 percent. Twelve states report no child-only cases due to immigration status, but such cases constitute 42 percent in California and 50 percent in Texas. Differences likely reflect state demographics and program rules, but no comprehensive analysis is currently available.

### What Are the Characteristics of Nonparental Cases?

About two-thirds of children in nonparental cases live with a grandparent.<sup>35</sup> Not surprisingly these caregivers are older than other TANF heads, generally in their early 50s.<sup>36</sup> In Tennessee and North Carolina, many report health problems and difficulty with activities of daily living.

**Figure 1. Child-Only TANF Families by Category, 2009 (percent)**



Source: Author's tabulations of U.S. Department of Health and Human Services (2009) data.  
 Notes: The chart represents the distribution of child-only subgroups by the reason no adult is in the assistance unit. The percentage above indicates each category as a proportion of all child-only TANF families and the percentage below, in parentheses, indicates each category as a proportion of all TANF families; therefore the percentages above sum to 100 and those below sum to 48.1.

Nationally, these TANF families are economically better off than other TANF families, with less poverty and more earnings,<sup>37</sup> which would be expected since they are generally not subject to TANF income limits. Education is more ambiguous, with one study suggesting that nonparental caregivers obtain higher education levels than TANF parents (New Jersey) and another that they obtain lower levels (South Carolina).

However, even though these families are doing somewhat better economically, the children seem to do worse. One national study finds that children in nonparental cases demonstrated problems similar to children in foster care. While their economic circumstances and health care use were better than other TANF children's, they had higher rates of poor mental health, trauma, and educational difficulties. Also, TANF staff, child welfare staff, and service providers found complex, unmet emotional and behavioral needs.<sup>38</sup> In state studies, up to a quarter of nonparental caregivers reported caring for a

child with a physical, learning, behavioral, or mental health issue (Tennessee) or in fair or poor psychological health (South Carolina).

Nonparental cases typically receive TANF for a long time. In Maryland, these cases spent an average of 36.2 months in the current spell compared with 13.6 months for other TANF cases. In Tennessee, nonparental cases had received child-only TANF an average of 44 total months.

### What Are the Characteristics of Parental Child-Only Cases?

Parental child-only TANF cases are diverse.

#### SSI Parents

A San Francisco study of SSI parents in TANF child-only households finds 71 percent with a mental health diagnosis and 64 percent with a physical or mobility limitation. As would be expected, SSI parents have low levels of employment. Several jurisdictions (Maryland, New Jersey, seven California counties) report that about 2 in 10 adults in SSI child-only cases had

worked recently compared to about half the heads of non-child-only TANF families (New Jersey). In the San Francisco study, SSI benefits supplied about half and child-only TANF one-quarter of all family income; nearly three-quarters of these families reported material hardships, and 23 percent reported hunger in the past year. SSI families stay on TANF assistance longer than families in most other child-only subgroups and other TANF families (Maryland).

Based on two state studies, there is reason for concern about these families' well-being. In San Francisco, two-thirds of SSI parents reported children having behavior problems, and 18 percent reported children in poor health. About one-third (32 percent) responded that they or their children had recent contact with CPS. Similarly, in Maryland, about one-third of children in SSI parent cases had experienced a substantiated or indicated incident of child abuse or neglect.

#### Immigrant Parents

The racial and ethnic backgrounds of immigrant families vary across state studies, including Latino families, families of African origin, and families of Asian origin (New Jersey, Maryland, and the California seven-county study). About one-third of parents are or have been married (Maryland, San Mateo/Santa Clara). Adults in these households have little education. In Maryland, they average 9.3 years of education and in San Mateo and Santa Clara Counties, 57 percent have fewer than 8 years of education.

Employment varies across state studies, though earnings are consistently low. In Maryland, 22.2 percent of household heads worked in the past two years, compared with over 40 percent of survey respondents in California's San Mateo and Santa Clara counties. Immigrant parents had higher employment rates than adults in other child-only subgroups in the seven-county study. Studies report very low earnings among those working, around \$270 to \$370 per month.

State studies vary in their findings about immigrant families' time receiving TANF. In Maryland, these families averaged 15.6 months on assistance, far less than for other child-only groups. In contrast, 61 percent of child-only immigrant cases in San Mateo and Santa Clara Counties had received aid for three years or more.

### Sanctioned and Other Ineligible Parents

Little information exists about child-only cases arising from sanctions or other reasons. Studies in Maryland and the seven California counties describe sanctioned parents as in their early to mid-thirties; about half had worked recently. The seven-county study described time-limited child-only families as having slightly older adults with correspondingly older children and about 59 percent of the adults working.

### What Other Services Are Available to Child-Only TANF Families?

A GAO survey of state TANF administrators provides information about noncash services available to nonparental child-only families. It finds that almost all states report links to Medicaid and food assistance and about half to child care benefits, while fewer than 10 report access to education and training, mental health, respite care, and support groups.<sup>39</sup> Other researchers find that some states provide targeted advocacy and support programs, funds for emergency or miscellaneous expenses, and diversion assistance to help caregivers remain off the TANF caseload.<sup>40</sup>

Child care assistance for relative caregivers partly depends on states' child care policies for all families, for example, the availability of child care for families with income above the TANF cutoff. A few states (including Washington and Oklahoma) target subsidies to working relative caregivers<sup>41</sup> or to relative caregivers more broadly (South Carolina).<sup>42</sup>

While no single study has examined parental child-only families, limited informa-

tion can be pieced together. The study of San Mateo and Santa Clara Counties indicates that adults in child-only families due to immigration status are ineligible for TANF supportive services, including TANF-funded child care subsidies. They may be eligible for child care subsidies through other California programs available for citizen children regardless of parents' immigration status.<sup>43</sup>

In addition, the San Francisco study noted that TANF-subsidized child care services were rarely available for SSI parents. The study also found that many respondents had received TANF-funded mental health therapy but no longer received those services.

### What Are the Implications for State and Federal Policy?

While many gaps in the evidence remain, clearly child-only cases differ substantially. The overarching implication is that no single policy will likely address the varied needs of all subgroups.

For nonparental cases, the evidence suggests that TANF may face policy challenges quite similar to those faced by the child welfare system, since kin raising children in the two systems are markedly similar. The policy challenges include how best to address children's emotional, behavioral, and medical issues; how and whether to help families explore permanency options (including parent-child reunification); how to help kin provide a stable and nurturing home; how and whether to involve other service systems such as mental health or early intervention to address complex needs; and whether TANF should change in response to child welfare reforms that include more kin families in formal foster care and guardianship.

### What Are the Remaining Research Questions?

Key gaps include descriptive information about families receiving child-only TANF, state policies and services, and child outcomes.

Beyond description, studies should analyze the link between state policies, caseload trends, and family outcomes; and identify promising state approaches.

A key step is exploring state TANF administrative data to describe child-only families, including potential data matches with child welfare systems. To develop a national picture from state administrative data, a coordinated effort to engage those states with the most child-only cases in each subcategory would be helpful. A forthcoming study of child-only cases and policies in California, Florida, Illinois, New York, and New York City will provide an important foundation for this work.<sup>44</sup> Better national estimates of the characteristics and service needs of child-only cases would also be valuable, but difficulties in defining this population and its subgroups in nationally representative datasets hinder current efforts.<sup>45</sup> A first step would be to assess the strengths and weaknesses of potential datasets.

Understanding the child-only caseload also requires filling large gaps in our knowledge of the state policy choices that create these cases, an endeavor likely requiring a combination of survey, interview, and case study strategies. Updated case studies could illuminate how emerging trends in child welfare policy affect kin raising children as TANF child-only cases.

Building knowledge about children's well-being in child-only families is also crucial. Partnerships with other agencies might enhance the likelihood of collecting new data, taking advantage of existing or planned surveys, or analyzing administrative data.

Several research strategies could strengthen our understanding of how state policies, programs, and innovations affect child-only caseloads and family outcomes. Researchers might consider taking advantage of state variation as a source of natural experiments, comparing states with different policies. ■



## Notes

1. Beginning with the U.S. Department of Health and Human Services' "TANF Sixth Annual Report to Congress" (2004), the definition of child-only cases excludes TANF child-only cases due to a sanction for fiscal year 2000 and beyond. We include these cases because they have generated considerable policy and legislative attention and some relevant research includes them.
2. Bavier (2010).
3. Gibbs et al. (2004).
4. GAO (2011).
5. U.S. Department of Health and Human Services (2010).
6. National TANF policy sets the context for these choices. In order to be considered an eligible family for the purpose of receiving TANF assistance, the adult caretaker in nonparental child-only cases must be a relative; or if state law provides that legal guardians or other individuals stand in loco parentis, then a state could consider a child living with such an individual to constitute an eligible family (<http://www.acf.hhs.gov/programs/ofa/polquest/usefunds.htm>).
7. Gibbs et al. (2004); Scarcella, Macomber, and Geen (2003).
8. Scarcella et al. (2003).
9. The Welfare Rules Database (Urban Institute, 2011) reports that 33 states do not permit unrelated caregivers, 14 do, and 4 are unclear.
10. For example, Arizona, Connecticut, North Dakota, and Tennessee (GAO 2011) have time limits for child-only cases.
11. GAO (2011); Schott (2011).
12. Gibbs et al. (2004) note that eight states or localities provided higher benefits than the regular TANF child-only grant to all kin caregiver cases, and four provided supplements above the regular child-only grant to some families.
13. We did not find a resource detailing these rules in all states. The Welfare Rules Database (Urban Institute, 2011) indicates some states exempt foster care payments from the TANF income eligibility test, but this rule likely refers to payments for a foster child not included in the assistance unit. GAO (2011) reports that the minimum foster care payment is greater than TANF child-only in almost all states.
14. Only the District of Columbia specifies that children receiving subsidized guardianship are ineligible for TANF (Welfare Rules Database, Urban Institute, 2011).
15. Adoption and Safe Families Act of 1997, P.L. 105-89.
16. Adoption and Safe Families Act of 1997, P.L. 105-89, U.S. Code Title III, Sec. 301.
17. Eleven states mounted assisted guardianship demonstrations using demonstration authority (GAO 2011).
18. Fostering Connections to Success and Increasing Adoptions Act of 2008, P.L. 110-351.
19. States are allowed a great deal of flexibility in how they design their guardian assistance programs (GAP) and which caregivers are eligible for GAP.
20. Gibbs et al. (2004).
21. GAO (2011).
22. Gibbs et al (2004); GAO (2011).
23. Main, Macomber, and Geen (2006).
24. Wiseman (2010).
25. Anthony, Vu, and Austin (2008); only Wisconsin places children of SSI parents in a separate program but it is TANF funded and reported as such (Welfare Rules Database, Urban Institute, 2011). In 2011, proposals to count parents' SSI as income for TANF purposes were active in three states, but none were implemented (Schott 2011).
26. The 22 states with state-funded TANF programs for at least some immigrants are Arizona, California, Connecticut, Georgia, Hawaii, Illinois, Iowa, Maine, Maryland, Minnesota, Nebraska, Nevada, New Jersey, New Mexico, New York, Oregon, Pennsylvania, Rhode Island, Utah, Washington, Wisconsin, and Wyoming (Rowe, Murphy, and Mon 2010).
27. DRA Sect. 7102(c)(i)(1)(A)(i)(IV).
28. Pavetti, Rosenberg, and Derr (2009).
29. Rowe et al. (2010); Schott (2011).
30. Parrot et al. (2007).
31. Rowe et al. (2010) identify California, Indiana, Oregon, and Rhode Island. GAO (2011) identifies California and Louisiana.
32. TANF, Final Rule. Fed. Reg. 64, 17719-68 (April 12, 1999).
33. Authors' calculations from U.S. Department of Health and Human Services data downloaded from <http://www.acf.hhs.gov/programs/ofa/character/> for various years, table 12. See also calculations for fiscal years 2000-2008 in GAO (2011).
34. Bavier (2010) finds that 75 percent of child-only TANF cases had a parent present in 2008 and that exact reasons for differences in estimates are difficult to determine.
35. Calculation from U.S. Department of Health and Human Services (2009, table 38).
36. Based on studies from New Jersey, seven counties in California, Tennessee, South Carolina, and Washington.
37. Bavier (2010).
38. Gibbs et al. (2004).
39. GAO (2011).
40. See Gibbs et al. (2004) for examples; California's Kinship Guardianship Assistance Payment, Florida's Relative Caregiver Program, Georgia's Grandparents Raising Grandchildren, and Kentucky's Kinship Care Program were identified in the Welfare Rules Database (Urban Institute, 2011).
41. Gibbs et al. (2004).
42. Edelhoj, Liu, and Martin (2002).
43. These families could be eligible for Child Care Development Fund (CCDF)-funded child care; Department of Health and Human Services guidance under CCDF clarifies that a child's immigration/citizenship status is the relevant status to consider when determining immigrant eligibility.
44. Goerge, Speigman, and Mauldon (2011). This study is supported by the HHS Office of the

Assistant Secretary for Planning and Evaluation and by the Administration for Children and Families, Office of Planning, Research, and Evaluation.

45. Acs and Loprest (2007).

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