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Testimony Before the Council of the District of Columbia

Committee on Facilities and Family Services

**Budget Oversight Hearing
Child and Family Services Agency
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Good morning Chairperson Lewis-George and Members of the Committee on Facilities and Family Services. My name is Victoria Taplin, and I am a managing attorney with DC KinCare Alliance. Our mission is to support the legal, financial, and related service needs of relative caregivers who step up to raise children in their extended families in times of crisis when the children's parents are not able to care for them due to mental health and substance use disorders, incarceration, death, abuse and neglect, and/or deportation. In the six years since our founding, we have helped over 850 relative caregivers raising more than 1,000 DC children in over 1,000 legal matters. DC KinCare Alliance is a member of the Fair Budget Coalition, and we support budget priorities and policies that alleviate poverty in the District of Columbia.

I am pleased to testify today regarding FY2025 funding levels for the Grandparent Caregiver Program ("GCP") and Close Relative Caregiver Program ("CRCP"), and to urge in the strongest possible terms that they be funded at levels that are in proportion to the increased numbers of applicants and children served each year. From calendar year 2022 to 2023, applications for both programs increased, as did the number of children served; notably, for the CRCP, there was a dramatic increase from 29 to 43 applications, with a corresponding increase of 71 to 106 children served.¹ At DC KinCare Alliance, we also are serving more caregivers every year and we tell all of them about these programs such that word of them continues to spread in the community. There is no reason, therefore, to believe that the number of applications will stay the same or go down; accordingly, keeping budget levels flat for these programs in FY 2025 is not appropriate and would result in tremendous hardship for DC's kinship families.²

¹ Grandparent Caregivers Program and Close Relative Caregivers Program, Annual Status Reports for 2022 and 2023.

² The Mayor's budget proposes a \$70,000 cut for the GCP for FY2025 after the program already sustained a \$100,000 cut for FY2024, and a \$113,000 cut for the CRCP in FY2025, amounting to a 12% reduction.

We must not return to the days of 2020 when there was a waiting list for applicants due to the funds having been exhausted. As it is, relatives who take children into their care under informal arrangements at the behest of CFSA do not receive the same amount in subsidies as foster parents. Relatives are only paid 66% of what foster parents receive, yet the cost of taking care of these children – food, clothing, child care, therapies to address the trauma they have experienced – is no less than what it is for foster parents. Other sources of cash assistance for these caregivers are very limited. If caregivers are employed and earning regular wages, they often exceed the income limits for regular TANF, so must apply for the child only rather than for their full household, which pays a lower rate. If child-only TANF and SNAP is all they have to cover the cost of the additional dependent in their household, the informal placement of the child in their home is not sustainable. The GCP and CRCP subsidies are vital and often make the difference between a relative caregiver being able to maintain their housing and put food on the table. If the public policy goal is to stabilize these children and families, underfunding these subsidy programs undermines that goal.

In order to maximize the benefit of these subsidies to kinship families, all efforts must be made to reduce barriers to access and the time from when a child enters a caregiver's home until receipt of the subsidy. In our experience, it would take a minimum of 3 months from the date the caregiver applies to when they receive their subsidy card. Yet recently, we have seen a trend toward increasing the documentation required to apply for the GCP and the CRCP, thereby extending the time period further. For example, CFSA now requires GCP applicants to provide a determination letter of TANF eligibility, rather than just proof that they have applied for TANF, which is all that is required by the GCP's governing statute³ and

³ See DC Code § 4-251.03(a)(7). It should be noted that although the GCP regulations do contain the TANF determination requirement, it had not been enforced before this year. Moreover, because the CRCP is a new program, no regulations have been issued yet and so CFSA does not require caregivers applying for the CRCP to wait for a TANF determination. We were informed by program staff that CFSA intends to issue regulations that would include this requirement and, at that time, would also impose the requirement on CRCP applicants.

all that has been required in the past. This change results in a tremendous hardship on grandparents, because it typically takes a minimum of 45 days after applying for TANF for a grandparent to receive an eligibility determination letter; thus, this new requirement front-loads an additional 45 days onto the application, resulting in a minimum time frame of 4½ months from start to finish. At the CFSA Budget Forum held on Monday, this issue was raised and Director Matthews indicated a commitment generally to reduce burdens to access these programs and specifically to change the GCP regulation to remove this requirement. We look forward to the prompt removal of this requirement from the regulation and implore CFSA to cease imposing this requirement in the interim period. We further note that the DC Council can make a legislative change to remove a related unnecessary barrier by removing the statutory requirement to apply for TANF if the caregiver can prove that the child is receiving SSI, as a child cannot receive TANF if they are receiving SSI.⁴ Accordingly, requiring an application for TANF in this instance is an exercise in futility.

Another new hurdle is requiring the applicant to furnish a copy of their lease or mortgage to prove DC residency. Until recently, a lease was just one way to prove DC residency; a District-issued ID or a utility bill was also sufficient. But now program staff is requiring a District-issued ID **AND** a current lease or mortgage, and is not accepting a utility bill. Not only is a lease longer and more cumbersome to submit than a one-page utility bill, but annual leases that have converted to a month-to-month have been rejected by program staff as “expired” and applicants have been told they need to obtain a rental verification from their landlord, an onerous task that can take time. A further example is requiring applicants who have a custody order to also obtain a document from the child’s school to prove that the

⁴ See DC Code Section 4-205.15(e)(1), which provides: “Individuals who are ineligible to receive TANF, and who shall be excluded from the TANF assistance unit during the period of ineligibility, shall include: (1) An individual who receives SSI benefits.”

applicant is the child's primary caregiver. This was never previously required of a caregiver who had a custody order awarding them primary physical custody of the child, but shows how CFSA now appears to be doubling down on documentation requirements without a statutory or reason-based rationale for doing so.

These burdensome and redundant new requirements place added stress on caregivers and their families and act in contravention of the Mayor's statutory duty to "process an application for a subsidy with reasonable promptness."⁵ Some of our clients have told us these extra requirements are just too much, and that they may have to forgo receiving the subsidy as a result. Indeed, it is likely that these new requirements have had a chilling effect on the number of applications submitted and approved and, correspondingly, the number of children served. Thus, the numbers reported by CFSA are likely artificially low and do not reflect the true demand for these subsidies. This only underscores the need to increase funding for these subsidies to meet demand.

Thank you for the opportunity to testify today. I am happy to answer any questions.

⁵ DC Code §§ 4-251.03(i) and 4-251.23(i).