

**Keeping Battered Women Safe Through the Welfare-to-Work Journey:
How are we Doing?**

**A Report on the Implementation of Policies for Battered Women in State
Temporary Assistance for Needy Families (TANF) Programs**

FINAL REPORT

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TABLE OF CONTENTS

Chapter 1: Setting the Context	p. 3
Chapter 2: Number of States with the Family Violence Option	p. 6
Chapter 3: Assessing for Domestic Violence	p. 9
Chapter 4: Temporary Waivers: How are They Handled:	p. 19
Chapter 5: Post-Assessment Service Delivery	p. 24
Chapter 6: Data: What Do We Know and What Does It Mean?	p. 36
Chapter 7: Conclusion	p. 40
Appendix A Sample Forms	
Appendix B State-by-State Summary of Domestic Violence Policies	

CHAPTER 1

Setting the Context

Consider three recent newspaper headlines and the implications of the accompanying stories.

1. Woman Stabbed to Death, Police Arrest Live-In Boyfriend. Infant in home uninjured. Neighbors report daylong domestic dispute

The Christmas Day victim of this man with a long history of arrest and imprisonment for domestic violence was a former TANF recipient who had just gone to work. She hadn't disclosed the domestic violence in her life to her case worker. The event triggered a department-wide discussion about what the state could do better to encourage women receiving TANF to let the department know so that help for them could be secured before they sought employment.

All too often, education, training, or work exacerbates domestic violence as the women's partners become threatened by their efforts at self-sufficiency.

2. Behind a Welfare Success Story, Struggles

In the April 20, 1999 New York Times a front-page story describes the welfare-to-work journey of Michelle Crawford, lauded by Governor Tommy G. Thompson and invited to tell her story to the Wisconsin Legislature in January as a symbol of the state's successful welfare reform policy. Reporter Jason DeParle went behind the public relations blitz to find out that Ms. Crawford's husband of two years, a recovering drug addict, seriously assaulted her at least four times last year. After Mr. Crawford was arrested for grabbing his wife by the throat, she had a nervous breakdown. Ms. Crawford enrolled in a Milwaukee, Wisconsin welfare-to-work program that obtained intensive outpatient therapy for her as well as medication. After removing her husband from her home, she eventually obtained a job and was able to go off welfare. Despite the order removing him from her home, Ms. Crawford let her husband return this winter, even after he was arrested for another fight last November. Mr. Crawford confided to the reporter that he worries that his role as the breadwinner is being usurped. "I don't like it, because I'm the man of the house," he said.

While the reporter stood by, Mr. Crawford angrily complained that his wife had failed to tell her admirers about his contributions to her success. "I pulled that lady in there out of a lot of rough stuff," he said. "Don't kick me to the curb, like, 'I did it all by myself.'" Worried that she would call the police again, he accused Ms. Crawford of 'telling lies on me'." He added ominously, 'I don't like liars.'"

What is the likelihood of Ms. Crawford being able to continue in her job without further injury or even death?

3. In the name of the Father

For Victims of domestic violence, feeding welfare databases is rarely worth the price.

This article in the Washington (D.C.) City Paper in February 1999 tells the story of Lisa, a TANF recipient. Lisa's boyfriend had physically abused her over the past year. She needed the income child support could provide, so she reluctantly filled out the form indicating that the abuser was the father of her son. When he received the letter asking him to visit the D.C. Corporation Counsel's Child Support Enforcement Division, he became enraged, Lisa says. After some pretty bad battles, Lisa's boyfriend devised a way he thought he could get out of paying the support. If Lisa signed over full custody of their baby to him, she would lose welfare benefits, but he wouldn't have to pay child support. Lisa's boyfriend

promised her that she could keep the child and he would give her money instead of to the city. And he capped off his proposal with a threat. He vowed that he would hurt her and the child if she did not cooperate with the scheme. So last September Lisa went to Superior Court and signed over her custodial rights to her one-and-a-half year old son.

Predictably, the plan fell apart. The father didn't give Lisa any money, and the abuse continued. So Lisa left her boyfriend, but as was his legal right at that point, the father took custody of the child at a Superior Court hearing. By December, Lisa, with the help of an attorney, had won joint custody of her son. Lisa feels that if she hadn't had to involve the father of her child in child support enforcement, she might not have had to give up her son. Lisa's attorney points out that when she was at the welfare department office last year, Lisa needed solid information about the implications of child support enforcement. She needed to know that judges could order custody and visitation if child support was being paid, and that she had the right not to cooperate if this would be dangerous to herself or her son. Some women interviewed in the newspaper story had never been told of the good cause exemption. Others didn't know that just giving the father's name would be enough to trigger the child support action.

How many states take the time and make the effort to explain all this to TANF recipients who may unfortunately be in Lisa's shoes?

The Family Violence Option

Recent data from five major research studies find that between 20 and 30% of welfare recipients are current victims of domestic violence. The Family Violence Option (FVO), an amendment to the federal welfare reform legislation, the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, enables states to keep women safe through the welfare-to-work process by giving them the opportunity to obtain access to domestic violence counseling, safety planning, and other needed services before seeking work. States most often implement the FVO by means of a temporary waiver from work requirements. Recently issued federal regulations clarify that states implementing the FVO will not be subject to federal financial penalties for failing to meet state work participation rates if the reason is that domestic violence victims have been temporarily exempted. In order to be held harmless from federal financial penalties, there are three requirements: (a) the program requirements that are waived must be specified; (b) the waiver must be granted appropriately based on need by a person trained in domestic violence and reevaluated every six months; and (c) the waiver must be accompanied by an appropriate service plan that is developed by a person trained in domestic violence.

Most states have adopted the FVO within their TANF plans or are making plans to do so this year. States are grappling with constructing policies, procedures, and service delivery schemes that keep women safe while at the same time complying with these newly enunciated federal requirements.

This report was completed before the new federal regulations implementing the FVO were promulgated in April 1999. States will be making a variety of changes in their policies and procedures as well as taking the time to formally certify that they have adopted the FVO as is required by the regulations.

Early in 1999 the federal Department of Health and Human Services asked Taylor Institute to determine what the states were doing to keep battered women and their children safe during welfare reform through a telephone survey and document review of the 50 states, the District of Columbia, and Puerto Rico.

How many states had adopted the FVO or policies similar to it?

What methods were the states using to encourage women to self-disclose domestic violence?

What assessment methods were the states using to screen for domestic violence?

How were women being referred for domestic violence services, and were these methods effective?

What have we learned about how to help battered women through the process without creating more scenarios like the three described above?

In short, how are we doing?

Between the end of January and early May of 1999 Taylor Institute interviewed 156 persons over the telephone: TANF policy people, child support enforcement officials, and state and local domestic violence coalitions. We received and reviewed state policies and procedures as well as most states' forms and notices. This year, unlike last year, we found that most states had finalized FVO or domestic violence policies and procedures, and had had some months of implementation on which conclusions could be drawn.

Chapter 2 of this document reports on the number of states adopting the FVO or with TANF policies on domestic violence. Chapter 3 focuses on what we consider the major issue in FVO implementation: how do states provide notice of the FVO to TANF recipients, and how they assess for domestic violence? Chapter 4 provides information on how temporary waivers work. Chapter 5 concentrates on service delivery strategies for battered women on TANF, especially focusing on the involvement of domestic violence advocates on-site at the welfare office. Chapter 6 describes the data we now have about the effectiveness of the FVO in keeping women safe. Chapter 7 recapitulates our recommendations for policy, service delivery, and further research.

We would like to acknowledge the assistance from the TANF officials and domestic violence coalitions who generously took the time to answer our questions, provide us with documents, and, in many instances, so graciously continued to receive our repeat telephone calls as we attempted to make certain that our information was correct. We hope that, in return, this report will contain information useful to them as they work to improve their FVO implementation.

We would also like to thank Jerry Silverman and Ann Rosewater at the federal Department of Health and Human Services whose funding of this project allowed Taylor Institute to uncover information that we hope will be useful to the field. FVO issues are critical issues, often involving death or serious injury. We are encouraged by the commitment of many states to seriously address the issue of domestic violence within their TANF programs, and we hope this 1999 report will be of assistance in this important effort.

CHAPTER 2

Number of States with the Family Violence Option or Domestic Violence Policies

As of May 1, 1999, most states had adopted the Family Violence Option (FVO) or had policies and procedures in place providing battered women with temporary waivers of work requirements. Some states told us that they did not formally adopt the FVO because they were worried about being able to implement all the federal requirements that might be necessary in the final regulations, but they did go ahead and put in place policies very similar to those in FVO-adopting states. For this reason, later on in this report we do not make a distinction between FVO and non-FVO adopting states, but will describe the contents of domestic violence-related policies.

States that have adopted the Family Violence Option

Thirty-six states have formally adopted the Family Violence Option (FVO). However, not all FVO-adopting states have final policies and procedures in place.

Thirty-two states have adopted the FVO and have policies and procedures in place.

STATES THAT HAVE ADOPTED THE FVO AND HAVE FVO POLICIES AND PROCEDURES

MAY 1999

ALABAMA	MINNESOTA
ALASKA	MONTANA
ARIZONA	NEW JERSEY
ARKANSAS	NEVADA
CALIFORNIA	NEW MEXICO
DELAWARE	NEW YORK
DISTRICT OF COLUMBIA	NORTH DAKOTA
FLORIDA	OREGON
GEORGIA	PUERTO RICO
HAWAII	RHODE ISLAND
IDAHO	TENNESSEE
IOWA	TEXAS
KENTUCKY	UTAH
LOUISIANA	VERMONT
MARYLAND	WASHINGTON
MASSACHUSETTS	WYOMING

FVO states without final procedures

Four states have adopted the FVO but have not finalized policies and procedures:

States with the FVO but without final procedures

Missouri
Nebraska
North Carolina
Pennsylvania

States adopting the FVO but giving counties the option to implement

Two states have left it to each county to determine whether to provide temporary exemptions from work for battered women.

States with county options

Colorado
Ohio (Ohio counties can offer some limited relief to domestic violence victims)

States in process of adopting the FVO

Five states report that they are in the process of adopting the FVO and implementing procedures:

States in process of adopting the FVO

Connecticut
Indiana
Kansas
New Hampshire
West Virginia

Non-adopting states with domestic violence policies and procedures

Six states have not adopted the FVO but do have policies and procedures that allow battered women temporary deferrals from work-related activities.

Non-FVO adopting states with policies and procedures

Maine
Michigan*
Mississippi
Oklahoma
South Dakota
Virginia

* Michigan is currently re-examining its decision not to adopt the FVO.

Wisconsin and Illinois have not adopted the FVO. In these states, policy does allow battered women to obtain domestic violence services as a work activity, but there are no specific policies for domestic violence victims at this time.

One state, South Carolina, will not adopt the FVO but has domestic violence policies in development.

**STATE CHOICES REGARDING THE FAMILY VIOLENCE OPTION
MAY 1999**

FVO AND FVO POLICIES	FVO AT COUNTY OPTION	FVO—NO FINAL POLICIES	ADOPTING FVO (IN PROCESS)	NON-FVO WITH DV POLICIES	NON-FVO DEVELOPING DV POLICIES	NO FVO NO SPECIFIC DV POLICIES
ALABAMA ALASKA ARIZONA ARKANSAS CALIFORNIA DELAWARE D.C. FLORIDA GEORGIA HAWAII IDAHO INDIANA IOWA KENTUCKY LOUISIANA MARYLAND MASS. MINNESOTA MONTANA NEVADA NEW JERSEY NEW MEXICO NEW YORK N. DAKOTA OREGON P.R. RHODE IS. TENNESSEE TEXAS UTAH VERMONT WASH. WYOMING	COLORADO OHIO	MISSOURI NEBRASKA N. CAROLINA PENN.	CONNECTICUT KANSAS N. HAMPSHIRE W. VIRGINIA	MAINE MICHIGAN MISSISSIPPI OKLAHOMA S. DAKOTA VIRGINIA	S. CAROLINA	ILLINOIS WISCONSIN

CHAPTER 3

Assessing for domestic violence

In the opinion of Taylor Institute, the major issue that has emerged in the implementation of domestic violence policies is effective assessment of domestic violence. Certainly it is every battered woman's right to decide whether she wants to disclose the domestic violence in her life. However, she cannot make a free and informed choice unless she clearly understands that she may disclose and why it may be in her interests to do so. The linchpin of any state's FVO effort is thus the method by which the state informs the TANF participant about the FVO or domestic violence policies, and provides the opportunity to self-disclose at all stages of the case processing and throughout the welfare-to-work process.

States have taken three general approaches to the issue of assessment.

Some states (29%) provide notice to TANF applicants and recipients of the availability of the temporary waiver. They rely on the women themselves to self-disclose and do not follow-up with any further questions about domestic violence.

② Some states (32%) do not directly tell TANF applicants and recipients about the FVO, but assess for domestic violence by asking a series of questions about the presence of domestic violence in the lives of TANF participants.

Some states (39%) provide both notification as well as assessment of domestic violence.

Notice and assessment protocols vary widely among the states. We have found, however, that fully 20 states have notice and assessment processes that on their face appear inadequate—in the words of one state domestic violence coalition, “FVO Lite.” Among these “FVO Lite” practices are one-sentence notices of the FVO that appear in small type face on the TANF application and that serve as the only notice of the FVO, as well as assessment schemes that add one or two questions about domestic violence on the application form or on family assessment forms. Some states have prepared brochures that describe the FVO as well as provide a great deal of information about domestic violence and battered women's services in the state. However, information about the FVO is often buried in these basic brochures about domestic violence, calling into question their effectiveness as FVO notice modalities.

This chapter will take a look at how states are performing notification and screening functions, describe emerging “best practices,” and provide information about innovative or creative features of interest. First, we will furnish information on emerging “best practices” around notice of the FVO or domestic violence policies. Then we will consider the issue of client assessment and the role that trained domestic violence advocates are playing in this process.

Notice of the FVO

“Best practices”

Many of the notices we have reviewed are simply too vague. They mention that domestic violence victims may request a waiver from the work program or from time limits. But they often fail to explain what the work requirements are going to be, and why victims of domestic violence might want to become temporarily exempt from them. In addition, many women applying for TANF do not relate to the description of domestic violence and thus will not respond affirmatively.

Some of the notices we have reviewed impress us with their clear layout, easy-to-understand language, and good enumeration of all the items that the FVO can temporarily waive. A few of these notices have strategically chosen not to use the term “domestic violence.” Rather they tell the TANF recipient that she will be required to participate in activities leading to a job. If working, or looking for a job may put the woman in danger of *physical, emotional or sexual abuse*, she may be able to be temporarily excused from these activities. Many women are unable to accept the term “domestic violence” or “domestic violence victim” as applying to themselves, and will resist being labeled by a welfare worker. The thinking is, however, that they may be willing to admit to “physical or emotional abuse” that sabotages their work-related activities.

In Appendix A of this report we reproduce some state notices that we think do a good job of clearly explaining the FVO to TANF applicants and recipients, describing domestic violence without using the term or labeling or characterizing women in detrimental ways.

✎ **Rhode Island’s** notice states, “If working, looking for a job or going to school may put you or your children in danger of physical, emotional or sexual abuse, we may be able to excuse you from these activities until the situation is resolved.”

✎ **Alaska’s** notice says, “Tell us if working, looking for a job, or going to school or job training may put you or your family in danger of physical, emotional, or sexual abuse. We may be able to delay you doing these activities so you can get help.” Alaska’s form presents many different examples of physical and emotional or verbal abuse on the back.

✎ **Oregon** tells recipients: “No family is the same, so we have many different types of services...Some families have things happening that keep them from being able to go directly to work...If working, looking for a job or going to school might put you or your family in danger, we can...”

✎ **Arkansas’s** brochure asks, “What if I am abused by a family member and can’t participate in a ‘work’ activity? If you are abused by a family member and can’t participate because of that abuse, then you are not expected to participate in a work activity....”

✎ **Nevada’s form** provides a list of abusive behaviors to which it may be easier for TANF participants to admit. The notice then makes a nice linkage of abuse to the requirements of the TANF program: “If you believe participating in these programs may put you or your family at risk of abuse, your worker may temporarily excuse you from such activities while you work through the domestic violence issues with the professionals in your community.”

✎ **New York** provides a notification of the FVO on a form, as well as on a palm card, which seems to be a useful format for battered women because they can easily hide the material from their abuser.

With its FVO notice form, **Rhode Island** takes the opportunity to tell the TANF recipient that the child support enforcement obligation can be waived due to danger of physical, emotional, or sexual abuse. Most FVO forms do not mention child support, although domestic violence is one of the primary reasons that paternity and child support collection efforts can and should be halted under the FVO. (See p. 15 for a fuller discussion of the need to integrate child support enforcement and FVO implementation.) *Most FVO forms we have reviewed fail to mention paternity or child support enforcement, and are sorely deficient in this respect.*

✎ **Washington’s** notice says, “Tell us if working, looking for a job, etc. may put you or your family in danger of physical, emotional, or sexual abuse. “ Importantly, the form also goes on to say, “Tell us if giving information about the absent parent(s) of your child may put you or your family in danger of physical, emotional or sexual abuse. We may be able to excuse you from giving us this information. Tell us if your child was conceived because of rape or incest. We may be able to excuse you from giving us information about the child’s absent parent. We may also be able to excuse you from helping us get child support for this child.”

✦ **Minnesota's** brochure also makes a good connection of domestic violence with TANF requirements. After stating that all recipients are required to work, the pamphlet goes on to say, "If you are being hurt by a family member or your abuser interferes with your effort to work, you can request a Family Violence Waiver." The rest of the brochure explains how to apply for the waiver.

The New Hampshire Coalition Against Domestic and Sexual Violence has produced a videotape describing the FVO for TANF applicants and recipients that the state TANF office department is now distributing to local offices. The eight-minute tape is a very professionally produced effort with excellent, easy-to-understand graphics. Repeated images of battered women getting assistance from domestic violence experts—at home, in the service office, and in the welfare department—should help to encourage women to seek assistance with the problem within the welfare-to-work context.

Copies of the tape are available for \$5, plus shipping and handling. Contact Linda Griebisch, Public Policy Director, New Hampshire Coalition Against Domestic and Sexual Violence at 603-224-8893, ext. 310, or linda@nhcadsv.mv.com

*** Recommendation**

We strongly recommend employing a notice that must be signed by the client, with a copy placed in the file. This plan provides an efficient way for TANF supervisors to monitor whether the notice is being used by spot-checking client files. The Rhode Island notice form must be signed by the TANF recipient. Hawaii's and Nevada's forms also require an applicant/recipient signature. (These forms can be found at the end of this report in Appendix A.)

Taylor Institute Guidelines for Rating a State's FVO Notice

Notice presents a clear statement of activities that the TANF office will require of the recipient, including child support cooperation requirements.

Clear linkage of work and domestic violence: notice explains that if an intimate partner will sabotage these work activities, the recipient may gain more time and special help to deal with the problem.

Notice explains domestic violence without labeling or victimizing women, using "abuse" or work or educational sabotage rather than the term "domestic violence."

Notice explains that paternity and child support enforcement obligations may also be suspended if they would be unsafe for the woman or her children due to the actions or responses of an abuser.

Notice is in at least 12-point type and in an easy-to-read format.

Notice is not buried in a lot of other information in a brochure about TANF or domestic violence, or on the TANF application form.

Applicant/recipient signs the notice so that the TANF office has a record that she has obtained the information.

Applicant/recipient is given a copy of the notice to take away with her.

Notice is given at numerous times during the welfare-to-work process, not just during the application time when women are the most nervous and tense.

Are Women Getting the Notices?

Once an adequate notice form is designed, the next issue to consider is: are women actually receiving a copy of it? Understandably, many TANF case workers experience difficulties in discussing a personal issue like domestic violence with recipients. This problem is exacerbated by the fact that so many women in the U.S. and/or their relatives have themselves experienced or experience domestic violence in their own lives. As a result, they may shy away from providing the notice that may serve to initiate a conversation about domestic violence that is difficult for them. A formal evaluation of one state's Family Violence Option program has found that some workers were not routinely providing the brochure to their participants.

Assessment

The family violence assessment or screening tools in use that we have reviewed are all brief, typically involving five or six questions. These questions ask whether the applicant or recipient has been the victim of any behaviors like pushing, grabbing, shoving, and the like from a current partner. At the conclusion of this report in Appendix A we reproduce three typical examples, from **Washington, Montana, and New York**. In some states shorter versions do exist, with two questions asked: Has your partner/former partner threatened you or done something that frightened you in the recent past? (within the last 12 months). Has your partner/former partner physically hurt you in the recent past? (within the past 12 months).

Evaluation reports from five FVO demonstration projects or research efforts provide us with much good information about the efficacy of TANF domestic violence screening instruments. In the 1998 Domestic Violence Screening Pilot in Kenai, **Alaska**, the staff found that the screening tool was "artificial" and that reading it was "bureaucratic." They didn't believe that the screening tool brought forth disclosures. Indeed, staff felt that it caused some individuals to "shut down." Because of these problems, the screening tool was used inconsistently, with some staff not using it at all, some using it some of the time, and a few using it all the time. Staff stated that child support requirements are a good introduction to discussion about domestic violence, and other opportunities present themselves as well. Staff also stated that use of the notification of Right to Claim Good Cause, along with their own interviewing skills, was more successful than reading the screening tool. As a result of this evaluation, the screening tool was totally eliminated.

In an evaluation of three FVO pilot projects implemented in 1998 in **South Carolina**, the South Carolina Coalition Against Domestic Violence and Sexual Assault interviewed a random sample of battered women in Richland County, one of the demonstration sites. These women stated that many of the questions were too personal to answer in an initial meeting with a case worker. The Coalition reports, "It was important to these women that the workers not get too personal. They were concerned about being pitied by the workers if the workers knew too much." The women also suggested that the screening questions be asked in a more conversational manner than being read item for item. "This would help applicants feel that the worker was really interested and saw them as more than just another number." Lastly, many of the women believed that the cubicles in the office do not afford adequate privacy to disclose personal information about the abuse. The women were afraid of being overheard. Family Independence workers also suggested eliminating some of the more personal questions on the form. "They thought that the more intimate questions were less likely to be answered truthfully."

As in Alaska, the short domestic violence screening tool devised for case worker use was eliminated about six months into the Options/Opciones Demonstration Project in **Chicago, Illinois**. Only a handful of case workers were making referrals to the on-site domestic violence advocates. These workers told evaluators that they did not use the screening form but just talked sympathetically with the participants. Since it appeared that most case workers were not using the form anyway, its use was discontinued.

In **Orange County, Florida (Orlando)**, interviews with TANF participants revealed that they were unwilling to disclose the abuse to others because of fear the abuser would find out; fear that their children

would be taken away due to failure to protect; and the feeling that others would not understand or be sympathetic.

And in **Wisconsin**, The Institute for Wisconsin's Future undertook a 1999 survey of battered women on TANF in domestic violence program sites, mainly in Milwaukee. Sixty-nine percent of the women did not disclose their abuse to anyone at the W-2 (TANF) agency. Twenty-two percent did not believe the abuse was "any of the case worker's business," and 18.7% indicated that they did not disclose because they were ashamed.

Rhode Island's more limited assessment questions may serve as helpful models in this regard:

"Has paternity been established for your child (ren)? If no, would it cause problems or put you in danger if paternity were established?

Is the absent parent(s) paying child support?

If not, what do you think would happen if s/he were required to pay child support?

The Family Independence Program wants everyone to have educational, job, or training opportunities if it is safe for them. Would this situation cause serious problems for you to participate in education or work requirements?"

Nevada's assessment form asks the worker to say "whether family and friends are supportive of household members working. What family support systems exist? (Look for possible indications of domestic violence. Does the significant other exhibit intensive interest in the applicant's application, ability to work or attend training? Is the significant other speaking or making decisions for the applicant?) Is there anyone who would interfere with a household member's efforts to obtain or keep a job? "

The experiences of these states indicate that it is possible to ask about domestic violence within the context of participation in child support enforcement and work activities. There is no need for the case worker to know, and for the applicant/recipient to be asked, about a range of abusive behaviors in the life of the woman. This information is personal and very intrusive. However, it is important for the worker to know, and for the woman to be asked, whether anyone in the household would try to keep her from going to a work-related activity by use of violence, or whether pursuing paternity or child support would cause danger for the woman and/or her children. Case workers should not be confused with persons charged with doing research on the prevalence of domestic violence within TANF caseloads. Researchers need to know the existence of various behaviors within the last year, but case workers only need to know if there is a person within the life of the applicant/recipient who might sabotage the woman's cooperation with the department through domestic violence.

*** Recommendation**

Although these evaluations from demonstration sites are hardly definitive, they do seem to suggest that screening questions should be asked in ways that are the least intrusive to the battered woman and force her to reveal the least amount of information about her private life that is necessary. All questions about domestic violence should therefore be linked to potential sabotage and danger around education, training, work, and child support enforcement; there is no need to ask general and intrusive questions about their partner's abusive behavior (kicking, punching, slapping, etc.) that will appear as entirely too personal or shaming.

The findings from these evaluations also present a conundrum: assessment seems to work better when the workers depart from the formal script presented by an assessment instrument. But without an instrument, it is difficult to make certain that workers are discussing domestic violence with their TANF participants.

We now report on a few innovative or best practices designed to provide case workers with sustained assistance and support in the assessment process.

Utah brings case workers together each quarter for additional domestic violence training and to discuss problems and issues around domestic violence assessment and service referral.

Oregon has produced a Domestic Violence Reference Card with tips for the case worker (See Appendix A). It reminds workers to send important messages to the victim: “We believe you. You are not alone. We will not share this information without your permission.”

The **Rhode Island** Coalition Against Domestic Violence produces a newsletter about the FVO implementation effort that is distributed to approximately 630 TANF staff members and other interested individuals. The newsletter is designed and written at the Coalition but is a collaborative project and is reviewed by 15 reviewers, including members of the state TANF administration. The coalition is currently exploring the idea of including a case worker on the review team. Of special interest is the message from the director of the Department of Human Services on the cover of each issue. Sample newsletters are reproduced at the end of this report in Appendix A.

Involving domestic violence advocates in the assessment process

Fourteen states involve outside domestic violence providers in the assessment or waiver process. We present them below as potential models for other states, especially in light of new federal regulations that require FVO waiver recipients to have service plans leading to work, developed by a person trained in domestic violence.

- * **Delaware** gives the TANF recipient ten days to contact a domestic violence provider, which then works jointly with the TANF agency and the recipient to devise an individual service plan.
- * **The District of Columbia** gives TANF recipients wanting an exemption three business days to make contact with a domestic violence provider, which also advises of the need for an exemption.
- * **Florida** requires the recipient interested in a waiver to seek an assessment from a trained domestic violence advocate with a minimum of two years experience. The results will be used to develop a safety plan, and elements of the safety plan will be used for joint development of the individual service strategy.
- * **Idaho** refers participants disclosing domestic violence to a domestic violence provider for a complete assessment and for recommendations about service delivery.
- * In **Maryland**, to receive the waiver, TANF recipients must participate in a minimum of one session with an in-house family violence expert.
- * In **Massachusetts**, there are eight domestic violence advocates hired from domestic violence programs, working with TANF offices to help with assessment, safety plans, documentation for waivers, and safe enforcement of child support. Four of the eight specialists work for the child support agency, as part of a research demonstration project funded by the Federal Office of Child Support Enforcement.
- * **Minnesota** requires a safety plan developed with the assistance of a public or private agency that has experience working with victims of domestic violence. Safety plans, along with corroboration or verification of the domestic violence, are then submitted to the TANF agency.
- * In **Montana**, the FVO exemption is only allowed if the woman is actively working with a domestic violence counselor, who verifies the meeting.

* **New Hampshire** requires women who obtain a waiver only with a sworn statement to provide corroborating evidence within six months. This new evidence can be obtained from a domestic violence provider.

* **New Jersey** requires TANF participants needing a deferral beyond one year to obtain an in-depth assessment from a domestic violence provider.

* **New Mexico** also requires TANF participants seeking waivers to visit a domestic violence service provider for a full assessment.

* **In New York**, on-site liaisons, either in-house or domestic violence service providers under contract, perform in-depth assessments, assist with verification, assess credibility, and coordinate referrals.

* **In Rhode Island** once an applicant/participant discloses domestic violence, a domestic violence advocate from the Women's Center of Rhode Island is summoned by beeper or cell phone. She comes to the office and undertakes an in-depth assessment, making a recommendation about a waiver. At the end of six months, all cases are reassessed to determine the waiver's renewal.

* **In Vermont**, to extend the waiver beyond six months, the department requires an independent clinical assessment by a health care professional of the continuing effects of domestic violence

Child Support Enforcement-Lack of Coordination Between FVO and Child Support Efforts

Of the 25 FVO notices and brochures that we reviewed, only nine states' materials mention child support in the context of domestic violence waivers available under the FVO (**Arkansas, Georgia, Kansas, Nevada, New Jersey, Oregon, Pennsylvania, Rhode Island, and Washington**). We think it is important to include child support when discussing domestic violence under the FVO. It could well be, for example, that many domestic violence victims---especially former victims---- will want to work and will not want or need a temporary waiver from work requirements, but it may be dangerous for them to collect child support as this action might reactivate the abuse. Discussing how domestic violence will affect various TANF obligations all at the same time appears less confusing for a domestic violence victim.

The majority of the FVO states currently give applicants and recipients a separate child support enforcement notice that explains that the women may ask for a good cause waiver of child support collection. This good cause waiver existed in previous federal welfare legislation, with a federal definition of good cause, allowing women to be exempt from cooperating with the child support program if pursuing child support is anticipated to result in:

Physical harm to the child for whom support is to be sought;
Emotional harm to the child for whom support is to be sought;
Physical harm to the parent or caretaker relative with whom the child is living which reduces such person's capacity to care for the child adequately;
Emotional harm to the parent or caretaker relative with whom the child is living, of such nature or degree that it reduces such person's capacity to care for the child adequately; and
Any other circumstances that would be detrimental to the child for whom support would be sought.

In addition, good cause would exist if the child was conceived as a result of incest or forcible rape or legal proceedings for the adoption of the child are pending before a court.

Under the 1996 federal welfare reform legislation, states gained the ability to come up with their own definition of good cause.

Our review of these child support notices indicates that most states have kept the original federal definition.

The notices range in length from one page to four pages, with the majority about two pages. Most have small, or even tiny, hard-to-read print. Most importantly, most of the forms do not use the terms used in the FVO notice. Instead, they use language like this:

Cooperation is anticipated to result in serious physical or emotional harm to the child;

Cooperation is anticipated to result in physical or emotional harm to you which is so serious it reduces your ability to care for the child adequately; or

The child was born after forcible rape or incest.

In the majority of the states, the FVO and the child support good cause are presented as separate processes, although the most compelling of circumstances-domestic violence-connects them. Domestic violence victims, already anxious, are exposed to additional stress when applying for TANF benefits, especially if they have recently escaped the violence. Two separate notices, with different definitions or descriptions of eligibility for exemptions, make the process all the more confusing for applicants and more labor-intensive for welfare workers. The first step toward a coherent, system-wide response to abuse is to explain as simply and clearly, and as early as possible, all the options available to the battered woman that will assist her in complying with welfare rules as well as keeping herself and her children safe.

Finally, a strict reading of “good cause” reasons in most FVO states, as a result of maintaining the old federal good cause definition, means that domestic violence victims and survivors cannot avoid child support enforcement unless the threat of domestic violence is so severe that it would reduce their ability to care for their child. This child-centered good cause definition is slightly different, and would appear to have a higher burden of proof, than the definition of domestic violence in the FVO. As the majority of the states have adopted the FVO, continuation of the pre-welfare reform good cause language in the child support context creates two different domestic violence determinations and verifications to have to occur.

Rhode Island can again serve as a model for coordination. (The notice can be found in this report’s Appendix A.) The notice brings together all the situations in which the welfare department can grant a temporary exemption due to domestic violence. The notice states: “You must help DHS and the Office of Child Support Services obtain a child support order for your children. If your children were conceived because of rape or incest, we may not have to pursue this case. If giving information about the absent parent(s) of your children or starting a paternity or child support case may put you or your children in danger of physical, emotional or sexual abuse, we may not have to pursue this case.”

Related to the issue of coordinated notices and forms, we found that states rarely allow the same verification used for FVO waivers, discussed in more detail in Chapter 4, to count for child support good cause determinations. For example, a state may accept a victim’s statement alone as verification for an FVO waiver, but require the same recipient to produce specific medical, law enforcement, or other legal documentation of her domestic violence before she can be considered for a good cause exemption from child support.

Although 11 FVO states will rely on the women’s word or her own sworn statement about the domestic violence for a waiver of the work requirement, and 17 FVO states will accept the victim’s sworn statement if no other evidence is available for such a waiver, we found only seven states that will accept the victim’s statement for child support enforcement as a first resort. These states are:

Alaska
Arizona
California
District of Columbia
New Jersey
Oregon
South Carolina

It is significant that these states report no significant increase in the number of good cause claims reported since they loosened up their evidentiary standards.

Of the 43 states that answered “No” when asked if state policy allowed the outright acceptance of a victim’s statement, 30 said that as a last resort they would likely accept a victim’s statement alone, if there was absolutely no other evidence to prove her claim.

***Recommendation**

We recommend that FVO-adopting states create a unified notice that describes both the work waivers as well as child support enforcement exemptions available, if pursuing either would create harm to the woman or her children. Standards for verification and corroboration should be similar for both waivers.

Making the assessment of domestic violence in the child support enforcement context more difficult is the fact that 29 states have not trained any of their child support enforcement staff in basic domestic violence awareness. Of the 23 states that have provided training to child support enforcement staff, over half (14) did not mandate the training for everyone involved in child support enforcement.

The seven states that have provided some level of basic domestic violence awareness training to **all** their child support enforcement staff are:

➤ **Alaska**, which held a training several hours long, conducted by a domestic violence provider. Tapes of the sessions held in Anchorage and Juneau were sent to the more remote areas.

➤ **Connecticut** has mandated all child support enforcement staff to attend a three-quarters of a day domestic violence sensitivity training conducted by a domestic violence provider.

➤ **Delaware** has provided all child support workers with very basic domestic violence information as part of a training on good cause policy. By summer 1999 a second full-day training will begin, conducted by domestic violence service providers.

➤ **Maryland** required its counties to conduct domestic violence training for child support workers based on an in-depth training model developed in Anne Arundel County. The training at the county level varied from one to two days.

➤ **Massachusetts** held a half-day training for child support workers in 1997.

➤ **New York** employed optional teleconferences that reached a large number of child support enforcement staff. Soon all county-level staff will attend sessions on the FVO that will include domestic violence awareness.

➤ **Rhode Island** provided three hours of domestic violence awareness training to all child support enforcement workers conducted by domestic violence providers.

A few states that have not trained all their child support workers have developed promising approaches to inform child support staff about domestic violence.

📁 **Maine** has three-day “New Worker Orientation Sessions” that bring together TANF and child support enforcement workers from all levels, data entry through management. Staff of domestic violence groups provide the four hours of domestic violence training during the sessions.

📁 **Iowa** is currently offering all its child support workers a half-day training in domestic violence. The training will be conducted jointly with TANF and Medicaid workers, and along with basic domestic violence information, the sessions will cover the FVO, child support good cause, and the Family Violence Indicator.

CHAPTER 4

Temporary waivers: how are they handled?

(See Appendix B for state-by-state description of domestic violence waivers.)

It is important to note that there are three types of “clocks”—time limits—created under welfare reform.

1. Federal law limits families’ receipt of federal cash assistance to 60 months unless they qualify for certain “hardship” or domestic violence exemptions. This is the “benefit clock.”
2. Federal law also requires TANF recipients to participate in work activities after 24 months of TANF receipt—this is the work “clock.”
3. States are free to adjust the above clocks to shorter time limits. They can also extend the clocks beyond the federal limits. However, states must then use their own non-federal monies to do so.

Fundamentally there are *three* ways in which states are implementing the waiver provisions of the Family Violence Option.

Some states are providing an up-front waiver of work requirements that stops the state’s work clock, the period of time before the TANF participant must be in work activities. Others will extend the time at the end of the work clock cutoff.

② Some states do exempt battered women from work participation, but the benefit clock (the length of time the participant can receive TANF benefits) is ticking, and the time can be extended at the end when the time lapses.

Some states do not provide an exemption or a deferral from work, but instead count participation in battered women’s services as a work activity.

Of 44 states with domestic violence policies and procedures known at the time of our interview, 20, or 45%, provide an up-front waiver of work requirements that immediately stops the work clock. Fourteen states excuse women from work requirements but extend the work clock at the end.

Of these 44 states, 15, or 34%, offered waivers that would also stop the 60-month lifetime TANF limit clock. (In some states the lifetime limit is a shorter period of time than the federally allowed maximum of 60 months.)

Ten states (23%) do not provide an exemption or a deferral, but instead count participation in social services as a work activity for battered women.

**HOW STATES ARE IMPLEMENTING FVO WAIVERS
MAY 1999**

Stop “Work Clock” Right Away	Stop “Work Clock” at End of Work Deadline	Stop “Lifetime Limit on TANF Benefit Clock” (1)	No Exemptions or Deferrals, Count DV svcs. as Work Activity	TOTAL
45%	32%	34%	23%	100%
(20)	(14)	(15)	(10)	(44)

(1) These states are included in the 34 states that offer the work exemptions

Length of waivers

Under the FVO, states may choose how long they want to exempt domestic violence victims from work requirements. The length of time of the waiver or deferral differs widely (See Appendix for state-by-state description of waivers.) Of 34 states with temporary waivers:

- 4 provide waivers lasting three months, with renewals (but one state limits renewals to 12 mos.)
- 1 provides waivers of four months, but renewable
- 1 provides waivers lasting 30 days, but renewable indefinitely
- 9 provide waivers of up to six months, with renewals
- 8 provide waivers of indefinite length
- 4 provide waivers of up to 6 months, with no renewals
- 3 provide waivers of one year, with renewals (one state renews for only one additional year)
- 3 provide waivers of one year, with no renewals
- 1 state allows counties to determine the length of the exemption

In five states, renewal of the waiver will require some additional review or corroboration.

One state requires that a domestic violence provider corroborate the participant’s statement of domestic violence.

Although one state does not initially require battered women with waivers to seek services, those needing renewals will be expected to be using services.

One state requires a state review team to review a waiver beyond the initial three-month period.

Another state requires a clinical assessment if a waiver is to be extended beyond six months.

In another state, the lack of corroboration will limit the initial waiver to six months. (Corroboration from a domestic violence provider will extend the waiver).

**LENGTH OF FVO WAIVERS/DEFERRALS
MAY 1999**

Length of Waivers	Waivers can be Renewed	Waivers Cannot be Renewed
3 months or less	5 states	
4 to 6 months	10 states	4 states
6 months to one year	3 states	3 states
Indefinite Length (includes at one state that allows counties to determine length of waivers)	9 states	

Corroboration for FVO waivers

(See Appendix B for detailed, state-by-state information about corroboration or verification.)

The vast majority of the states will rely on the woman's word or her own sworn statement about the domestic violence as part of the TANF waiver determination process.

11 states will take the woman's word for it unless the worker believes it is questionable, and will not ask for any verification.

17 states will accept the victim's sworn statement if no other evidence is available and if there is no reasonable basis to doubt the word of the victim. In one state, if this is the only verification, the waiver is limited to six months. In another, a supervisor has to approve a waiver when it is only based on the women's affidavit.

The remainder of the states require additional evidence of the domestic violence.

7 states will accept the sworn statement of another person familiar with the abuse, if no other evidence is available.

2 states require a domestic violence agency to perform an assessment before a waiver is granted, so therefore do not require any verification at this stage.

In 4 states, if verification from police or medical records is unavailable, a domestic violence provider assessment will serve as verification.

Three states require police, court, or medical records. One of these states requires a police report specifying that the abuse or battery actually occurred.

In one state, county departments determine the extent of the verification required.

**CORROBORATION REQUIRED FOR FVO WAIVERS
MAY 1999**

Victim's statement alone (written or verbal) is acceptable	Additional proof required, beyond victim's statement
38 states	6 states

Deciding about waivers

(See Appendix B for a state-by-state description of the waiver process.)

The FVO allows states to decide which personnel will grant waivers.

Most states have empowered the case worker to make the decision about the temporary waiver. The exceptions are:

Five states require a domestic violence agency to perform an assessment. The provider then advises the TANF office on the need for an exemption, and in some instances works cooperatively with the TANF office to develop an individual services strategy.

In one state, a central committee rules on all waiver requests.

In one state, the director of the agency must approve waiver extensions.

In another state, if more than three months are needed, the case must be handled by the state review team.

In another state, an official in the state office must review all waiver requests and verifications.

In one state, to obtain a renewal after a year, participants must obtain an in-depth assessment from a domestic violence provider.

In one state, on-site domestic violence liaisons, (specially trained TANF staff members) must assess the credibility of the claim and are empowered to make waiver decisions.

In one state, domestic violence advocates are called on site to perform the assessment and establish whether a waiver is necessary. The office supervisor then approves the waiver. Advocates follow-up before the end of six months to determine the need for a renewal of the waiver.

One state requires a clinical assessment by a health care professional to extend a waiver beyond six months.

CHAPTER 5

Post-Assessment Service Delivery

We found that in most states women obtaining temporary waivers are expected to cooperate with domestic violence services unless it is dangerous to do so. They are asked to be as active as they can toward elimination of the domestic violence serving as the work barrier, but no activities putting them at risk will ever be required.

At the time of our research there were 12 states that did not have mandatory service participation; the rest did. In some of these states, renewals of exemptions after six months or a year would definitely require participation in domestic violence services or other activities to help battered women become self-sufficient. In addition, although participation in services is not required in some states, women are strongly encouraged to take part in services designed to remove the domestic violence barrier.

This chapter will describe some of the interesting and innovative ideas we have uncovered at the state and local level around service delivery for battered women receiving TANF benefits.

These include:

- ① **Special appropriations for off-site domestic violence services; On-site or co-location of domestic violence services in TANF offices; Innovative arrangements for off-site services; and Innovative in-house TANF staffing.**

① **Special appropriations**

The State of **Maine** has appropriated \$500,000 over a two-year period to enter into contracts with domestic violence services. These providers will receive referrals of TANF families for counseling and other activities to assist them to remove the welfare-to-work barrier of domestic violence. Funds are provided up-front to the providers.

In **Nevada**, a two-year appropriation of \$250,000 for the same purpose is administered on a cost-reimbursable system for providers serving battered women on TANF.

Washington State has given each of its six regions funds for support services for battered women.

Maryland provides each district with a pot of money for domestic violence training each year.

Pennsylvania has allocated \$500,000 per year for positions in domestic violence service organizations to serve as liaisons with TANF offices. Seventeen of 67 counties, including Philadelphia and Allegheny (Pittsburgh) have TANF advocates. Only one domestic violence program has located the advocate in the TANF office. The advocates help battered women navigate the TANF system, obtaining waivers or good cause for child support enforcement, as well as obtaining needed social services connected with domestic violence. Although the TANF offices are to refer participants for services, most of the women helped so far by the liaisons have come first to domestic violence services, according to the Pennsylvania Coalition Against Domestic Violence.

On-site domestic violence advocates

Through our telephone calls we have identified some demonstration projects that involve placing a domestic violence advocate from a battered women's service program on-site at the TANF office. From our

conversations with these projects and a review of the data available from them, it would appear that these demonstrations represent a very promising approach. We will present information here about the demonstration projects that we have located, concentrating on the learnings from the projects as identified by their coordinators. It is important to note that these projects are as interesting for their failures as well as for their successes.

NOTE: Many district offices in **Oregon** have established collaborative arrangements with local domestic violence providers, through funding from Violence Against Women Act or Victims of Crime Act monies, and TANF dollars. District offices have domestic violence providers on-site varying amounts of time, from three hours a week to ten hours or more, undertaking a variety of activities. For more information contact Carol Krager at 503-945-5931.

1. The Massachusetts Domestic Violence Specialists

At the time of this writing Massachusetts has eight advocates in TANF offices, three in the Boston area and five covering the rest of the state. Four of the specialist positions are Massachusetts Department of Transitional Assistance employee positions. The other four are funded through a Federal Office of Child Support Enforcement demonstration grant to the Massachusetts Department of Revenue's Child Support Enforcement Division. The advocates provide information, training and technical assistance to recipients and workers, assist recipients with services and waiver requests, help with documentation, assist with safety planning, work with recipients to develop economic self-sufficiency plans, and help to make assessments for domestic violence waivers.

The specialists receive referrals from TANF workers who suspect domestic violence or to whom the TANF recipient has disclosed. They assist not only in safety planning and case management for needed domestic violence services, but also work with the TANF participant and the case worker to devise a self-sufficiency plan that the client can safely implement. A big piece of their work is to coordinate services between the TANF office and the domestic violence service community. One of the areas in which the specialists work is helping women obtain access to emergency shelter. Work with the TANF recipients has revealed the acute lack of shelter space in Boston as well as a whole host of additional service gaps.

Project supervisor Janet Fender observes that the physical presence of the domestic violence specialists at the TANF offices makes it easier for workers and recipients to recognize and gain access to domestic violence services, resulting in safer and more successful interventions for battered women who come to the TANF office. It is important to note that these domestic violence specialists are employed by the state and are not just domestic violence advocates co-located in the agency, which might make a difference in terms of the speed of acceptance of the project.

For further information: Janet Fender, Massachusetts Department of Transitional Assistance, 617-348-5978.

2. The Topeka, Kansas OARS Project (Orientation, Assessment, Referral, Safety)

The OARS demonstration project was established in February 1999 as a precursor to the State of Kansas's adoption and implementation of the Family Violence Option. The pilot emerged from a statewide task force consisting of state and local domestic violence and sexual assault advocates and state and local welfare staff. An OARS advisory committee was established that included staff from the local Department of Social and Rehabilitation Services (SRS) office, central SRS office, and advocates from across the state with various areas of expertise. The committee also included representation from Child Support Enforcement.

In the OARS Project, an employee of the YWCA/Battered Women's Task Force has a private office within the SRS TANF office. Individuals disclosing domestic violence/sexual assault are referred to the OARS advocate for further assessment and services. In addition, the advocate makes presentations about domestic violence during the 20-minute group intake orientations, at which time applicants receive a copy of the OARS brochure. The presentation is brief (about 3-5 minutes).

The workers use five screening questions. These questions are also found on posters placed throughout the office. Since face-to-face-screening by workers is not always a possibility, the project developed a self-test for domestic violence and sexual assault that the worker can give to the recipient to complete on her own time.

Although the OARS Project is considered to be a component similar to Job Club, there are no sanctions for failure to comply with the activities outlined in the individual's service plan. Women can be in the component full-time or part-time, and may participate in other work-related activities when appropriate and safe.

As in many demonstration projects, the number of women self-disclosing in the initial months has been low. Between February 1 and March 31, 1999, the OARS presentation was given to 495 individuals. Very few have disclosed domestic violence during or immediately following this session. Loretta Pyles of the Kansas Coalition Against Sexual and Domestic Violence, who has been involved in the design, implementation, and evaluation of the project, believes that this is due in part to the fact that women have just applied for assistance and are anxious about meeting with their worker and obtaining the needed information about their eligibility. "It is a time of economic crisis for these individuals and most are not prepared at this time to talk about domestic violence."

Between February 1 and the end of April 1999, 40 individuals disclosed and were referred to the OARS advocate for assessment and services. Twelve, or 30%, are participating in OARS. Approximately 85% of these referrals came directly from case workers, grounds for optimism. The on-site advocate has provided individually tailored domestic violence services including safety planning, counseling, assistance with orders of protection, other legal advocacy and referrals, shelter referrals, and referrals for clothing, child care and housing. At the three and six-month mark the project will track the employment status of these individuals.

Although the state hoped to expand the model to other Kansas locations, as of this writing it appears that the expected funds for this purpose will be unavailable.

For further information contact Loretta Pyles, Kansas Coalition Against Sexual and Domestic Violence, 785-232-9784. E-mail: lpyles@juno.com

3. Harbor House Work First Plus Program (Orlando, Florida)

Harbor House, a domestic violence services provider in **Orange County, Florida (Orlando)** is currently in collaboration with the Florida Department of Children and Families and four area Lockheed Martin One Stop Centers. The One Stops are funded by the local WAGES Board (county workforce development commissions) to provide employability-related welfare-to-work services for TANF recipients.

This past year Harbor House's domestic violence advocates have been unable to obtain a permanent office at the One Stops, but they hope to be able to establish four such offices by the end of summer 1999. As a result, during this past year Harbor House domestic violence specialists came on-site approximately two hours per week at the One Stops. Domestic violence advocates make presentations about domestic violence during the group orientation and Job Club sessions. During the mandatory orientation sessions, TANF participants fill out a 30-question self-assessment form that includes five yes or no questions about domestic violence. Harbor House staff attempted to follow-up with participants who self-disclose domestic violence on the forms.

In the first four months of operations, 100 women had self-disclosed through the orientation process. One Stop case managers made no referrals. However, only ten women, (10%) received domestic violence services from Harbor House as a result of this process. In addition, the project found that most women received services for three to five sessions but were not involved for the extended period they thought they would be.

According to Wende Phillips of Harbor House, the follow-up method was ineffective. Women were difficult to reach by telephone, and client safety precluded leaving messages for the women when answering machines, voice mail, or other family members were reached. Co-location at the One Stops is believed to be essential. "It is essential to begin services at the very moment that the woman self-discloses," explains Phillips. "If services are not immediately accessible, by the time the woman is linked up, the situation will have changed temporarily for the better and the victim will not be inclined to follow through." The future success of this project will hinge on the presence of a domestic violence advocate full-time at the One Stops.

According to Harbor House, the self-assessment instrument appears to be a success. It is filled out thoroughly, with many women writing extensive comments and notes on the side. However, Harbor House believes that the Job Club sessions are the more successful venue for generating self-disclosures. The groups are smaller and more private and giving and seeking information about domestic violence there seems safer for the women, according to project staff. TANF participants have told the project that they were unwilling to disclose because of fear the abuser would find out; fear that their children would be taken away due to "failure to protect;" and feeling that others would not understand or be sympathetic.

Phillips notes that the Lockheed case managers have very little time to spend with TANF participants, no more than 15 minutes, making the on-site domestic violence advocate essential.

For further information contact Wende Phillips, Harbor House, 407-246-7007.

4. Options/Opciones Project (Chicago, Illinois)

The Options/Opciones Project is a demonstration project of Taylor Institute in collaboration with the Illinois Department of Human Services and Rainbow House and Mujeres Latinas en Accion (two community-based domestic violence service providers) in the low-income community of North Lawndale who residents are primarily African-American and Hispanics. The project, which began in September 1997, is one of the very first projects in the country to experiment with the placement of domestic violence advocates in a TANF office.

According to the initial design, all TANF applicants and recipients were to be screened for domestic violence at intake and every subsequent meeting with their case worker at the office, using a written notice to be read to the client and a brief screening instrument designed by a city-wide working group that conceived and structured the project. Domestic violence victims were then to be referred to the domestic violence advocates on site at the TANF office. An off-site location nearby was also established where the women could receive follow-up individual counseling, group workshops, and case management. A total of three domestic violence advocates are employed by the project.

However, five months after the project began, referrals were at a low of eight women per month. Case workers advised that the notice and screening tool were cumbersome. Only a handful of workers were making referrals to the program. Those five workers making referrals to the project revealed that they had better luck when they dispensed with the forms and simply talked with the women. Although the forms were eliminated, referrals did not substantially increase. In an effort to jump-start the referrals, domestic violence advocates began providing information about domestic violence and the Options/Opciones Project to women in groups as they waited to see their case workers or to participate in job club activities at the TANF office. Referrals to and participation in the program increased significantly for the next 11 months, averaging 25 referrals per month, of which approximately 12 were a direct result of welfare department staff referrals.

Two months ago, at the suggestion of the domestic violence advocates, a new system was put in place. Intake workers were given a directive to send applicants to meet with the Options/Opciones advocate one-on-one following their intake interview. Staff states that it is still uncertain whether this process will be effective. In the last two months, 400 women came through the doors of the project through this automatic intake referral process, of whom 33 (8%) chose to participate in the project.

Outcomes of project participation are, however, extremely encouraging. As of March 31, 1999, of the women who said that they wanted to participate in the program, 27% actually followed through with services. Of these women who came for at least one follow-up session, 51% are either in school, a training program, or at work. The challenge now, according to project director Rebekah Levin, is to increase the numbers of women choosing to self-disclose and participate in the program.

The project is collecting extensive data about the women and their abusers so that an eventual analysis can be made of what factors are associated with program success.

Although the project has shown that domestic violence advocates on-site can effectively screen for domestic violence, according to Rebekah Levin, it remains an open question as to whether the TANF workers can be effective in notice and screening functions around domestic violence. Through training and other activities, the Illinois Department of Human Services continues to work with the project to improve the performance of the TANF case workers, but it may be that domestic violence advocates on site will always have a greater ability to establish the trust necessary for disclosure. Private foundations in the past have primarily funded the project, but the Illinois Department of Human Services will primarily support it beginning July 1, 1999.

For further information contact Rebekah Levin, Taylor Institute, 773-342-0630. E-mail: RebekahLevin@juno.com

5. Family Violence Option Advocacy Program-Rhode Island

This project began July 1998 as a collaboration with the Rhode Island Department of Human Services (DHS) and the Rhode Island Coalition Against Domestic Violence. TANF staff provide written notice to all TANF applicants and recipients about work and child support waivers, resources for victims, and a description of the process of applying for a waiver. Women indicating an interest in a waiver or in domestic violence services are referred to family violence advocates. One of two advocates from the Women's Center of Rhode Island is contacted by cell phone and immediately comes to the office to conduct assessments, safety planning, crisis counseling, and other domestic violence services. All the state's TANF offices are referring cases to the project.

For the ten-month period between July 1998 and April 1999, the advocates have served 168 women. Of these women, 49 went on to complete an in-depth assessment necessary to obtain a work or child support requirement waiver. Based on the assessments, 17, or 35%, had a waiver recommended for child support; 21, or 43%, had a work waiver recommended; and 11, or 22%, had a waiver recommended for both child support and work.

To evaluate the Family Violence Option Advocacy Program, the Department of Human Services has contracted with mch evaluation, inc., a data system design, management and analysis firm in Barrington, Rhode Island. Mch is designing a telephone survey for 100 DHS participants who were referred to or called a family violence advocate from July 1, 1998 to December 31, 1998. Women who received extensive advocacy services will be compared to those who received more limited services. The purpose of the survey is to:

- Measure the amount and type of advocacy services a client received;
- Determine participants' satisfaction with the referral process and advocacy services;
- Determine barriers to referral and advocacy services;
- Measure the knowledge gained about domestic violence resources; and
- Understand how the FVO program has helped the participants through education, training, employment, and improvements in their personal relationships.

For further information, contact France Mantak, Rhode Island Coalition Against Domestic Violence, 401-467-9940. E-mail: fmantak@ricadv.org

6. The San Antonio (Texas) Demonstration Project

Over the past 18 months a demonstration project in **San Antonio, Texas** operated as a joint project of the Texas Workforce Commission, Texas Department of Human Services, the Alamo Workforce Development Board, Family Violence Prevention Services, and the Center for Social Work Research at the University of Texas at Austin School of Social Work, the official evaluator of the project. The Texas Department of Human Services contracted with Family Violence Prevention Services to place three domestic violence specialists in two TANF and workforce offices in San Antonio. The specialists worked individually with participants who self-disclose or were referred to them by case workers, and provided information about domestic violence and the availability of a waiver to groups of TANF recipients in the offices. As of this writing, funding for the project has lapsed.

Domestic violence specialists spoke to groups of TANF recipients at TANF orientations, workforce Employment Planning Sessions, and in resource rooms to explain that they were available to talk individually with anyone for whom family violence was a concern. This process could reach only about 8% of the TANF caseload (about 250 women) at the study sites in any given month. From the first of June to the 31st of August, 1998, 47 women (19%) availed themselves of the opportunity to talk with the domestic violence specialist.

Forty women acknowledged domestic violence, but only 16 wanted waivers, and were excused from work requirements for a three-month period. As of August 31, none of the women who had been granted waivers had taken action to have them renewed. The evaluators caution that the data presented here are based on a relatively short experimental period of time. It is quite possible that victims of domestic violence may initially avoid the use of waivers, only to find themselves in difficulties as they try to meet TANF requirements later on.

In interviewing the 40 women who requested waivers, the evaluators were able to obtain some interesting information about how the problem of domestic violence impacted on their welfare-to-work efforts. Six of the victims believed they could meet TANF requirements without interference from their partners; twenty of the women weren't sure how their partners would react when they move toward financial independence, but they were concerned for their safety; and 14 women knew that their partners were going to make it difficult for them to get training or hold a job, because in some cases their partners had already done so when they tried to work in the past. Most of these women wanted to work, did not believe they needed a waiver, but did need assistance with managing this process in an environment of violence.

According to the National Training Center on Domestic Violence and Sexual Violence, which has been providing technical assistance throughout the project, women were more likely to reveal domestic violence and to seek help from staff if a special person talked to them about family violence in a group session and was available to talk with them privately. In those sites where the coordinator did not talk directly with participants and was not as available on a regular basis for individual conferences, women were less likely to self-identify as victims of domestic violence and to acknowledge their need for help. One of the key project recommendations is that in order for FVO implementation to work, some special staff must be available for this purpose. These staff members need to be people other than the staff who determine eligibility and recommend sanctions, although communication regarding participants with domestic violence problems will be needed among all staff.

For further information, contact Pat Cole, National Training Center on Domestic and Sexual Violence, 512-407-9020. E-mail: pcole@ntcdsv.org

7. Modesto, California Behavioral Health Services Team

The Stanislaus County (Modesto) California Behavioral Health Services Team consists of experts in the areas of substance abuse, mental illness and domestic violence, who are on-site at the TANF office. At present, two domestic violence advocates employed by Haven Women's Center are participating on the team, which is funded by the County Board of Supervisors.

Team members receive referrals from the approximately 300 TANF workers in the county office. Members of the team meet to staff cases and to determine which team member will take primary responsibility for the referral. Although some crisis counseling and crisis intervention is done, most women referred to the team are called into the office for an assessment. Of 144 referrals since the start of the program in May 1998 until the end of March 1999, 103 women were assessed. Seventy-five of these were enrolled in two on-site domestic violence groups that are run each week. Twenty percent of the women failed to participate in domestic violence services following assessment. In April and May 1999, an additional 42 women went through the assessment process. The team approach enables referrals to be made back and forth, but, importantly, allows battered women with multiple problems to receive coordinated services at the TANF office.

In the beginning, referrals from TANF workers were few and far between, but have picked up considerably since November 1998. Advocates explain that some workers are better than others at referring. Some workers still don't feel comfortable talking with the women about domestic violence, but they make referrals when they suspect domestic violence as a result of seeing bruises, for example. Advocates also believe that knowledge of the program is spreading by word of mouth, and some participants are asking their workers to be referred to the project.

According to one of the advocates, the biggest challenge is working with the women who do not realize that they are abused and are not yet ready to accept the fact that they are victims of domestic violence. The important thing, she says, is to engage them where they are, and not to jump immediately into safety planning or talk about leaving their partner.

The program was recently enhanced by the addition of a domestic violence specialist social worker position. She acts as liaison to the domestic violence counseling staff, provides ongoing domestic violence training to staff, and undertakes other duties to make certain that the Behavioral Health Services Team is well integrated into the TANF staff.

For further information, contact: Janette Garcia, Domestic Violence Specialist, Behavioral Health Services Team, 209-558-2716, or Joann Blaska, Stanislaus County Community Services Agency, 209-558-2862.

Common Pilot Project Themes

TANF eligibility determinations, times of economic crisis, may not be the best time to either capture the attention of battered women or convince them that they may safely disclose. However, because child support enforcement information is taken at the time of TANF eligibility, there is a need to raise the issue of domestic violence at this time. Many projects have found, however, that more disclosures occur after financial eligibility is established.

TANF caseworkers may never be able to obtain a large number of self-disclosures because of their ability to sanction participants or undertake other official actions. The presence of domestic violence advocates on-site may be necessary to increase the number of women who feel safe enough to self-disclose.

Some projects strongly believe that the presence of on-site advocates does stimulate “business.”

Presentations to large groups at orientation sessions have not been the expected panacea. More disclosures occur in smaller groups, like job clubs, or in one-on-one conversations with domestic violence advocates.

Many of the women self-disclosing do not need waivers from work; rather, they need assistance in working through the problems connected with trying to work or obtain training while they are living with an abuser.

Battered women continue to explain that they do not disclose because of the fear of being pitied. Self-assessment on a simple form, along with a one-on-one private interview with an experienced domestic violence service provider, may be one way to overcome these fears. There are other methods, but they must be designed to overcome shame and fears of being pitied.

Planned Demonstration Projects

The **Tennessee** Families First Program is in the process of implementing four pilot projects, funded with Victims Of Crime Act (VOCA) money. Each pilot will involve a trained domestic violence advocate four days in the TANF office and one day back in the battered women’s service program. The pilots will be implemented in Nashville, Memphis, two counties in eastern, rural Tennessee and two counties in western rural Tennessee.

North Carolina is now in the planning phase to establish six pilot projects throughout the state as a precursor to statewide FVO implementation. These pilots will involve different service delivery modalities, including on-site domestic violence providers in some locations.

In **Pasadena, Texas**, the Bridge Over Troubled Waters, Inc. is planning to provide on-site, intensive case management services to TANF participants who are identified as being in need of services due to domestic violence, through funding from the Houston-Galveston Area Council Workforce Program. Domestic violence advocates will be available at four area one-stop Career Centers, providing presentations about the dynamics of domestic violence in life skills training at the centers, with follow-up on site counseling and intensive case management services. The project hopes to serve 300 TANF recipients, five from each Career Center per month. In addition, the project will receive a set of referrals of participants who are at risk of sanction. This group will be assessed for domestic violence by the project. Staff will go to the women’s homes if necessary to conduct the assessments, because many of these women have not been able to cooperate by coming into the one-stop Career Centers.

The **Texas** Legislature recently provided funding for four pilot sites that will undertake assessment, intensive case management, and an array of services designed to promote job retention and advancement. The focus in these sites will be on assisting clients in overcoming barriers to success in long-term

employment, and will include clients for whom domestic violence is a threat to safety and an employment barrier.

Innovative off-site arrangements

Approximately 85% of TANF recipients in Tennessee are mandated to participate in the **Tennessee Fresh Start program**. Fresh Start offers a one-month Life Skills Component that is delivered by private contractors and is intended to explore and begin to resolve major barriers that interfere with the welfare-to-work journey. Domestic violence is a mandatory subject and is usually handled by the local domestic violence provider during the course of one day. The Tennessee Families First Program is currently attempting to strengthen this section of the module and better integrate it into the state's FVO implementation effort. The Fresh Start program would appear to provide battered women a safe milieu in which to disclose domestic violence and be connected up to services.

The **Massachusetts** Department of Transitional Assistance is funding an innovative training program called "Joining Forces for Women's Economic Development." Training seminars will be offered in thirteen locations throughout the state in late spring. In its invitation to service providers, the department states:

"To receive assistance, many TANF recipients must take steps toward economic self-sufficiency. Taking these steps safely and effectively may be difficult for those who have experienced domestic violence or substance abuse. Supporting survivors of domestic violence and women in recovery from substance abuse requires skill and solid collaboration between welfare-to-work providers and those who advocate for battered women and women with substance abuse."

In the first round, community-based providers of services to battered women, recovering substance abusers, and women involved with child protective services will come together to educate one another about the barriers to independence faced by TANF recipients, learn how to provide effective support to women with these problems as they undertake to meet welfare-to-work requirements, and begin to develop strategies for working together on behalf of the women to be served.

Then, in round two, these same providers will join welfare-to-work and workforce development specialists to educate one another about the barriers to achieving self-sufficiency and the services available to help women meet the challenges they face, and begin to develop strategies for working together to enable survivors of domestic violence and those in recovery to achieve economic independence.

For further information, contact Judith Lennett at Northnode Consulting Collaborative, 617-522-8755, or Valorie Faretra, Massachusetts Department of Transitional Assistance, 617-348-5508.

Innovative in-house TANF staffing

Some states have specialized in-house staff who provide in-depth case management services to families presenting domestic violence and other issues. These include **Utah**, which has MSWs trained in domestic violence in regional offices; **Iowa**, which has Family Development and Self-Sufficiency (FaDDS) case managers providing comprehensive services for families with multiple problems; **Vermont** Reach Up workers, also providing in-depth case management for families; and **Nevada**, which has licensed MSWS in most of its district offices.

Four states have developed systems for in-house domestic violence experts. In **Oregon**, each TANF district has a domestic violence point person who provides back up and support to TANF workers on issues of domestic violence. **Maryland** has an in-house family violence expert who is the first referral after disclosure.

In **Kentucky**, if women disclose domestic violence, a required report is made to the Division of Protection and Permanency for investigation and follow-up. Services will be offered through this process as well.

New York has established a system of on-site domestic violence liaisons. Liaisons are specially trained personnel, either in-house or domestic violence service providers under contract. The majority are in-house persons who have participated in four days of domestic violence training. Liaisons have the responsibility of assessing the credibility of the assertion of domestic violence; informing the victim about services as well as the waiver process; assisting the participant with verification of domestic violence; and coordinating domestic violence services referrals.

*** Recommendation**

We recommend that TANF offices experiment with and expand efforts to employ domestic violence advocates from local providers on-site at welfare department offices. Early indications are that these advocates increase the comfort level of TANF case workers, encouraging them to more enthusiastically implement domestic violence policies and procedures, as well as increase the number of women who do self-disclose domestic violence.

CHAPTER 6

Data: What do we know and what does it mean?

This chapter will present the data currently available from the states about FVO implementation. Data is still not available in the majority of the states. Data fall within three categories:

- ① **Number of waivers granted;
Number of women self-disclosing; and
Case outcome data after a waiver is granted.**

Using the **number of waivers** granted as an indication of the success of FVO implementation is fraught with difficulties. We have seen that in many states, temporary waivers are not given, but time is extended at the end of differing time periods. For this reason, the number of waivers granted does not adequately capture or measure a state's FVO effort. It is also possible that many battered women do not want or need temporary waivers or deferrals, but they could, as a result of self-disclosure, be receiving counseling or other domestic violence services that are providing them with great benefits. In addition, domestic violence victims may also be granted work exemptions through another category, such as having a very young child or a handicapped relative in the home. The number of waivers granted will thus not fully describe a state's FVO implementation effort. Thus, the number of waivers is just one tool to determine whether a state is assisting battered women through the welfare-to-work process.

With these caveats, we present waiver data from the five states where it is available.

Massachusetts

Between September 1, 1997 and March 9, 1999 (18 months), 91 work-related waivers were approved; 66 persons received an extension of the time limit for receipt of TANF benefits; 7 received an deferral from school attendance; and 29 an exemption from the family cap (where a child born to a TANF case is not added to the grant), for a total of 193.

Arizona

Between November 1997 and February 1999 (16 months), 203 temporary deferrals for domestic violence have been granted.

New Jersey

For the period beginning July 1, 1997 through January 1999 (18 months), 249 individuals requested a domestic violence deferral from the New Jersey work requirements. The total number of domestic violence exemptions from the 60-month lifetime limit of receipt of assistance for the same period totaled 152.

Minnesota

Minnesota has two waivers: a waiver of employment and training requirements and a waiver of the 60-month lifetime limit.

Women who were exempt from employment and training requirements because of a domestic violence safety plan in September 1998 numbered 140. Women whose domestic violence safety plan caused the month not to be counted for the 60-month TANF time limit in September 1998 numbered 274.

Kentucky

In February 1999, 54 women were participating in counseling for domestic violence as a work activity.

The number of women **self-disclosing** provides a better measure of a state's FVO implementation effort. Most states, however, have not yet moved to code cases in this manner. When we do have the numbers who self-disclose, analysis is difficult, because although we may have the total caseload number for the state, we may not really know how many women were screened in the time period so as to determine a percentage that can be used for comparative purposes. In addition, women may not self-disclose to the welfare worker, but they may take the domestic violence information in the palm card or brochure and use it productively. They may seek services on their own, or even obtain an order of protection as described in the brochure. There are ways to measure the impact of this information. For example, domestic violence service providers could ask how the battered woman heard about their services and keep track of the numbers who learned about them from a brochure or presentation in a TANF office. With all these caveats, however, tracking disclosure rates will give states some idea of how well they are doing in giving information to women about the FVO.

We present data about disclosure from eight locations. Although between 20 and 30% of women on TANF disclose current domestic violence to social science researchers, the disclosure rates in welfare offices are running considerably lower. Since not all battered women need or want a waiver, at this time we have no ability to evaluate the success or failure of FVO programs based on disclosure data alone. Battered women applying for or receiving TANF would need to be interviewed to determine whether they would have wanted a waiver had they adequately understood the policy or to ascertain the reasons that they did not disclose the domestic violence.

In the **Topeka, Kansas OARS demonstration project**, presentations about domestic violence were made between February 1 and March 31, 1999 (one-and-a-half months) to 495 TANF participants. Twenty-seven, or 5%, self-disclosed domestic violence.

At the **Anne Arundel County (Maryland) Department of Social Services Pilot site**, the disclosure rate for domestic violence remains at 5%.

In **Rhode Island**, a total of 168 TANF recipients were referred to the two domestic violence advocates between July 1998 and April 1999 (nine months). Forty-nine, or 29%, were recommended for waivers: 17 for child support waivers; 21 for work waivers, and 11 for both.

In **Nevada**, between July 1998 and the end of November 1998 (four months), 254 women had self-disclosed domestic violence. Of these, 157 obtained service referrals.

Utah reports that 12% of its caseload has reported domestic violence. In a small sample of long-term recipients, 15% self-disclosed.

South Carolina has provided data from three recently concluded demonstration projects that occurred within a 12-month period. In the Laurens County pilot, 351 women were screened during the year, and 98, or 25%, disclosed domestic violence. In Orangeburg County, 1,184 were screened, and 30 self-disclosed. In Richland County, 1,468 women were screened and 49 disclosed. Therefore, a total of 3,003 TANF recipients were screened and 176 identified as former or current victims of domestic violence, representing approximately 6% of the women assessed.

In the **San Antonio Pilot project**, in a three-month period 47 women were referred to on-site family violence specialists. Of these referrals, 68% reported the violence to the case worker. In an additional 8% of the cases, the case worker suspected violence. The site had approximately 3,300 open TANF cases, but many of them had no face-to-face contact with case workers during the demonstration period. The 47 women represent about 6% of the total coming into the office during the three-month demonstration period. Sixteen (40%) of the 40 recipients who acknowledged domestic violence sought waivers and were excused from work requirements for an average of 2.4 months.

Between February 1998 and March 1999 (13 months), 300 TANF recipients disclosed domestic violence in the **Chicago-based Options/Opciones project**. This represents about 10% of the total caseload in the office of 3,000 women.

Determining **outcomes** for battered women who do disclose or who receive temporary waivers, or who participate in domestic violence services is, of course, the very best method of determining success of a state's FVO implementation. We have not found a state that can give us any outcome information. Two sites, however, should yield interesting data. Through Portland State University **Oregon** is interviewing 125 women on TANF who have participated in domestic violence-related services through the TANF office. TANF recipients are being asked whether they were believed when they disclosed domestic violence, whether they felt supported, whether they were referred to services, whether the services were included in their individual plan, whether they were able to follow-through or complete the plan, and how the agency can improve services to people experiencing domestic violence. Interviews should be completed by mid-summer 1999.

Rhode Island has contracted with a data system design, management, and analysis firm to interview 100 recipients who were referred to or called a family violence advocate from July 1, 1998 to December 31, 1998. The purpose of the FVO survey is to measure the amount and type of services a client receives; to determine the client's satisfaction with the referral process; to determine barriers to obtaining services; to measure knowledge gained about domestic violence resources; and to understand how the FVO has helped recipients, in terms of education, training, employment, and the quality of their relationship.

*** Recommendation:**

States that refer domestic violence cases to in-house social workers or other specialized workers are in an excellent position to do outcome tracking on small samples of cases in this way, and we would strongly encourage them to do so. Women who have self-disclosed and have participated in domestic violence services are in good position to inform the state's entire FVO implementation effort. We still await data about employment-related outcomes for battered women who receive either waivers or specialized services. It would appear to be in every state's interest to capture and analyze this information.

Emerging Issues in Data Collection

Now that most states have policy and procedures determined and implemented, it is time for both states as well as for advocates concerned about how battered women are faring during welfare reform to obtain much needed data. In the previous section we have highlighted three benchmarks that can be used for this purpose. Here we talk about some additional important issues.

① Process evaluation

Are policies and procedures being implemented as required? Before data is collected and analyzed, it is important to determine whether the policies are actually being implemented at the local level. **New York** has taken the lead in this regard. In a process evaluation, each county TANF office was visited for an assessment using the attached Domestic Violence Review Instrument. The 56 New York counties were divided up by staff persons for visits, which began at the end of December 1998 and were completed in the spring of 1999. New York reports that most counties were in compliance, but that there was some confusion that the visits were able to straighten out.

County-option states

States that are required to grant wider powers to counties in administering TANF or the FVO must take extra efforts to make certain that battered women do not suffer more harm through local FVO policies that may exacerbate the violence. For example, Colorado has adopted the FVO, but allows counties to decide how to implement it. A survey of county policies found various county definitions of domestic violence,

some of which may increase the risk of abuse or are ineffective in helping women toward self-sufficiency. A good number of Colorado counties, for example, have written policies requiring that the domestic violence be a current problem within the last 30 days. Since domestic violence is often exacerbated when women undertake education, training, or work, it could be likely that no episode had occurred within the last 30 days, but the woman could be placed in serious danger if she were required to participate in a work activity in the future. In addition, domestic violence in the past that caused current problems like posttraumatic stress disorder would not be taken into account.

States with varying degrees of county autonomy include North Carolina, Ohio, Colorado, and Maryland, and present more complicated problems of FVO implementation than in other states.

In Florida and Texas, once TANF eligibility is established, the case is transferred to a local workforce development board that has the responsibility for taking the recipient from welfare-to-work. Here the TANF agency has no real power or authority over the local board, and in some instances the problem is complicated by the privatization of the function to any entity like Lockheed Martin. Increased attention to monitoring and staff training in states like Texas and Florida will be in order.

*** Recommendation:**

Because many battered women may be unable to comply with TANF requirements, their risk of sanction may be great. Since research has demonstrated that 20 to 30% of TANF caseloads are current domestic violence victims, and the number of women self-disclosing domestic violence remains low, TANF departments that are concerned to keep women safe during the welfare-to-work process should do a complete assessment for domestic violence prior to final sanctioning.

CHAPTER 7

Conclusion

Unlike last year's report, this year we find that most states have completed the process of adopting the FVO and implementing domestic violence policies and procedures. Our review of these policies and what we know about their implementation suggests the following urgent needs:

☆ **Better drafted FVO or domestic violence notices.** We strongly recommend employing a notice that is signed by the participant, with a copy placed in the file. This plan provides an efficient way for TANF supervisors to monitor whether the notice is being used, by spot-checking participant files. We recommend a notice that presents a clear statement of activities that the TANF office will require of the participant, as well as clear linkage of work and child support with domestic violence. The notice should explain domestic violence without labeling or victimizing women, using abuse or work or educational sabotage rather than the term "domestic violence."

☆ **Less personal and intrusive domestic violence assessment instruments.** Based on preliminary evaluations, we recommend that screening questions be asked in ways that are the least intrusive to the battered woman and force her to reveal the least amount of information about her private life that is necessary. All questions about domestic violence should therefore be linked to potential sabotage and danger around education, training, work, and child support enforcement. There is no need to ask general and intrusive questions about their partner's abusive behavior (kicking, punching, slapping, etc.) that will appear as entirely too personal or shaming.

☆ **Consolidated FVO and child support enforcement notices, with a common definition of domestic violence and the corroboration needed.** Separate notices, with differing definitions of domestic violence and differing standards for verification in FVO-adopting states, create needless confusion and difficulty for battered women and for welfare workers. We recommend that standards for corroboration be similar for both waivers.

☆ **Expansion of the number of on-site domestic violence advocates who seem more effective in assessing for domestic violence and immediately linking TANF participants to services.** Early indications are that these advocates increase the comfort level of TANF case workers, as well as battered women; and

☆ **More sustained and committed effort in some states to making the FVO work to keep women safe.** This could include in-depth domestic violence screening of all cases facing final TANF sanctions.

There is also a need for better data. We need:

☆ **More outcome data** (Are battered women receiving services eventually going to work? Which women are being helped by the FVO and which not?)

☆ **A more complete list of demonstration projects or sites employing on-site domestic violence advocates or other innovations;**

☆ **Better synthesis of experiences, data, and outcomes across demonstration projects; and**

☆ **More states willing to put TANF dollars into demonstration projects and other innovations.**

As this FVO monitoring project is ending, Taylor Institute, through its collaboration with the University of Michigan Research Development Center on Poverty, Risk, and Mental Health, will continue to report on research data coming from demonstration efforts through its Trapped By Poverty, Trapped by Abuse publications and supplements in 1999 and following years. Check our web site for this information at www.ssw.umich.edu/trapped Help us serve the clearinghouse function by sending us information and material. Become a member of Taylor Institute (\$75) to receive all publications in advance.