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Joanne Samuel Goldblum
Executive Director
The National Diaper Bank
Network

Dear Mr. Palermino:

Thank you for allowing the National Diaper Bank Network and our member diaper banks in Connecticut the opportunity to comment on Connecticut's proposed Temporary Assistance for Needy Families (TANF) State Plan. Diaper banks in the state of Connecticut are dedicated to ensuring that children have the diapers they need to stay clean, healthy, and dry. Because diapers cannot be bought with food stamps (SNAP) or WIC, many families have difficulty affording a sufficient supply of diapers for their infants and toddlers. This is a condition we call "diaper need." TANF is the only federally funded government program that needy families may use to purchase diapers. Thus, the diaper banks of the state are very interested in the Connecticut State TANF Plan.

We find much to admire in the plan; the state has developed programs clearly designed with the objective of helping people secure and maintain stable employment. We note, however, a lack of explicit consideration of basic hygiene needs in the programs that touch infant and toddler care and parents' ability to care for their children that may result in unintended barriers to service. Additionally, we urge as a general matter the state to consider not only income, but also basic needs beyond food and shelter when calculating eligibility levels. For families with children who have not yet been toilet trained, diapers can mean the difference between participating in child care and not, which can affect a caregiver's ability to work outside the home.

An adequate supply of diapers for each child can cost \$100 per month or more—particularly if bought in small quantities at the corner convenience store—a sum which can command a sizeable portion of a fulltime minimum wage salary of \$1508 per month (pre tax) or the average TANF cash assistance allowance (in 2013, \$688 a month for a family of three). Even for families making 75% of the state's median income for a family of three (in 2014, \$7676.56 per month gross), as the state defines "needy family" for the purpose of the Temporary Family Assistance (TFA) Program, \$100 per month can require families choose between diapers and a utility payment, fresh produce, or filling the car with gas.



We therefore make the following suggestions of areas where the state might consider including diapers in the services provided to needy families.

Diaper Assistance for Child Care Related Programs

Importantly, for the work support programs featured in Connecticut's TANF plan, diapers can represent a hidden barrier to entry to many of the state's programs. For example, without diapers, a family may be unable to take advantage of the Child Care Assistance for Unemployed and TFA Recipients, as most child care centers, including those that receive payment through Care4Kids, require parents to provide the diapers that their children will use while at the center. Our research surveying child care centers in the state finds that the same is also true for home-based centers, many of which are less well funded than center programs as they charge less and receive less state reimbursement than center programs. Indeed, in our survey of 150 child care providers in Connecticut, only 30 said that they provide free diapers to children. Five of these were Early Head Start programs, which are required by federal regulation to provide diapers.

For families making less than 50% of the SMI, the diapers required for child care programs can cost more than the family fee for child care under the TANF Plan Child Care Assistance Programs. For example, a three-person family receiving less than 20% of the SMI, or \$1444 per month, is required to pay 2% of their income, or \$28.88 per month. The diapers for one child cost \$100 or more per month, or 6.9% of the family's gross income. Because parents must provide diapers for their children under the Care4Kids program as currently constructed, parents of infants and toddlers must pay more than three times as much as the family is required to contribute to subsidized child care for the diapers necessary to participate in the subsidized child care program.

Although not applied universally, there is recognition in government programs that diaper need can present a barrier to access to assistance. Head Start center based programs are required to provide diapers per federal regulation because requiring diapers would result in a *de facto* fee to access Head Start. Additionally, certain state Young Parents Programs which separately contract with local diaper banks already provide diapers for the children of teen parents who receive child care through the program. Although the state Care4Kids implementation of the CCDF and TANF child care programs do not currently provide diapers, as noted in the letter attached from the U.S. Department of Health and Human Services to U.S. Congressional Representative Rosa DeLauro, there is no restriction in federal regulation or legislation from states using federal Child Care Development Funding (CCDF) for diapers as a way to increase access to child care for families. Because use of TANF for child care is governed by the CCDF regulations,



either federal TANF or CCDF can be used or supplemented by state funding for diapers in support of the mission of subsidized child care programs.

For these reasons, we request that the state extend similar recognition that requiring parents to provide diapers in order to participate in the other state funded Child Care Related programs is a *de facto* fee and potential barrier to access. Further, we request that the state provide diapers, diaper vouchers or additional funds for families with children under the age of three years old enrolled in the following programs included in the state TANF plan:

- Child Care Assistance for Unemployed (A.2)
- Connecticut Workforce Advancement Grants for Education (CT WAGE) (C.1)
- Women in Transition (C.2)
- Child Care Assistance Programs (Non-TFA and former TFA families) (C.6)
- Center based early childhood services (D.1)
- Special benefit and Child Care Assistance (D.6)
- Child Care Assistance (TFA Recipients) (D.10)
- Young Parents Programs (D.25)

Diaper and Toilet Training Assistance for School Readiness

We have heard from Connecticut diaper banks and state agencies that school readiness programs are also affected by diaper need, as more and more children entering these programs are not yet toilet trained. While toilet training is arguably one of the most important milestones to being ready for a classroom environment, there is no provision either for toilet training or diapers for children over three years old who are otherwise of the appropriate age for school readiness training. They are then denied access to the benefits of school readiness training as well as living under a stigma that may aggravate delayed behavioral development.

We therefore request that the state allow children who are not toilet trained but are otherwise eligible to enroll in school readiness programs and that the state provide diapers as necessary in School Readiness and train teachers to toilet train children who need instruction in that critical hygiene function. (C.7)

Diapers in Home Visiting and as Incentives

We also request as a general matter that the state consider using diapers as incentives for the various education and home visiting programs provided in the TANF plan. We know from diaper banks across the country who partner with education programs, Healthy Start, Nurse Family Partnership home visiting programs, and other models of intervention assistance, that diapers can serve to open a closed door to home visitors and can provide a bond between parent and the visiting assistant. We also know from the success of the Baby and Me Smoke Free smoking cessation program, a private



initiative that began in 2002, that diapers can be a very useful incentive for changing parental behavior. The Baby and Me Tobacco Free program has been implemented in 9 states and is in the progress of implementation in 11 additional states.

Diapers can reinforce the home visiting program in myriad ways. Parents may find themselves involved in the child welfare program because well meaning bystanders mistake poverty, and a lack of diapers and other hygiene products, as neglect. Diapers, as a basic need that are expensive and not covered by the SNAP or WIC programs, are often the most requested item for social service programs that provide products for babies. Moreover, a sufficient supply of diapers can reinforce the work of home visitors because diapers can help parents address the needs of a crying baby, protect children from diaper rash or increased risk of urinary tract infection, and establish parent-child bonding during diaper changes. For programs that include an initial home assessment, diapers could be provided during the first visit as an inducement to open the door to the assessment and then as an incentive to continue or complete the program.

We request that the state include diapers as an explicit element of the following programs:

- Emergency Assistance Foster Care Maintenance Months 1-12, Department of Children and Families (A.3)
- Fatherhood Initiative (C.4)
- Child Welfare Prevention and Intervention Services (particularly the Family Support Teams, Intensive Home Based Services—Family Based Recovery, Parent Aid (Love and Security, Therapeutic Child Care, and Treatment/Prevention of Child Abuse programs) (D.1)
- Addiction Treatment Services (D.3)
- Employment Success Program—Department of Social Services (D.12)
- Alternative in the Community (AICO)—Judicial Branch Court Support Services (D.16)
- Family Resource Centers (FRC)—State Department of Education (D.20)

Diapers as Basic Need for Individual and Public Health

When we refer to basic needs, we often refer to those most fundamental requirements for survival and health—food, shelter and clothing. Hygiene, and the products required to ensure that our bodies are clean and protected from the filth that can adversely affect health, similarly is a fundamental requirement for health and survival. Diapers, as the only means for infants and young toddlers to “toilet” without contaminating the environment around them and their families, are a basic need for the health of the child, the child’s family, and the community around them. Children who remain in wet or soiled diapers too long are exposed to greater risk of severe diaper dermatitis, urinary tract infections, and other illnesses. Children left in a “loaded” diaper for long periods of time



may expose their families and communities to fecal borne pathogens. Diapers are a critical component of ensuring that babies and their families stay healthy.

We request that the state include as its operating principle a commitment to first ensuring that participants in the State TANF programs can meet their basic needs whether independently or with assistance. We also request that the state include diapers as a basic need for families with very young children in the following programs:

- Aliens-Temporary Family Assistance (B.1)
- Non-hardship Families who received more than 60 months of TFA benefits (for those with children under three years old) (B.2)
- Safety Net Services (C.5)
- Employment Services, including Special Benefits and Child Care Assistance (D.6)
- Individual Performance Contracts (D.7)
- Employment Success Program (D.12)

We applaud all that the state has proposed to assist families in improving their economic and emotional situations, but we ask that the state explicitly address not only work opportunity, but also the very material need of diapers for families enrolled in the TANF program. Diaper need can present obstacles to parents hoping to improve the economic conditions for themselves and their families by preventing parents from taking part in child care and endangering the child's, family's and public's health. We ask that the state take advantage of the many opportunities provided by this plan to make diapers available to our youngest and most vulnerable residents.

Thank you for the opportunity to comment.

Sincerely,

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