

# Who is Benefitting from Your Clients' Benefits?

## Preserving the Social Security Disability and Survivor Benefits of Youth in Foster Care

### INTRODUCTION

You may have represented or been involved in a case with a child or youth who was eligible for and may have been receiving federal disability or survivor benefits. Chances are that neither you, your client, the judge, nor even the agency attorney knew these benefits had been applied for, paid out — and to whom or for what purpose. And chances are that nary a dollar of those benefits were ever used as required by law to address the individual needs and best interests of your client or conserved on their behalf.

*Tristen Hunter was 16 and preparing to leave foster care in Juneau, Alaska, when a social worker mentioned that the state agency responsible for protecting him had been taking his money for years. Hunter's mother died when he was little, and his father later went to prison, court records show, leaving him in a foster home. In the years that followed, he was owed nearly \$700 a month in federal survivor benefits, an amount based on Social Security contributions from his mother's paychecks. "It's really messed up to steal money from kids who grew up in foster care," said Hunter, now 21, who says he is struggling to afford college, rent and car payments. "We get out and we don't have anybody or anything. This is exactly what survivor benefits are for."*<sup>1</sup>

This scenario is not anomalous, but standard practice from coast to coast — so entrenched in our child welfare system it has gone largely unnoticed and unchallenged for decades. How is it possible that several sources of federal entitlement benefits, as well as the savings and assets of youth in foster care, are being regularly intercepted and pocketed by another public agency — without notice, due process, or accountability?

<sup>1</sup> Hager, Eli & Shapiro, Joseph. "State Foster Care Agencies Take Millions Of Dollars Owed To Children In Their Care." *NPR*, (April 22, 2021). Available at: <https://www.npr.org/2021/04/22/988806806/state-foster-care-agencies-take-millions-of-dollars-owed-to-children-in-their-ca>.

### ABOUT THE AUTHOR:



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Fortunately, change is afoot due to courageous storytelling by youth, bold legislative action in states such as Maryland and Texas, thoughtful rulings by judges from North Carolina to Alaska, and powerful high-profile media coverage. This article will outline the issue and the related law, review successful reform to date as well as pending opportunities for policy change at the state and federal levels, and recommend avenues for practitioners to better protect their clients, hold agencies accountable, and ensure that their clients' benefits are actually benefiting their client.

## THE ISSUE

A child may be eligible for Supplemental Security Income (SSI) benefits due to a physical or mental disability. In addition, a child may have entered care due to the disability or death of a parent who worked and contributed payroll taxes to Social Security, or one who served in the U.S. military. When this happens, these earned death benefits, Old-Age, Survivors, and Disability Insurance (OASDI) or Veteran's Affairs (VA), are in most cases paid to a parent's surviving children until they turn eighteen.

Disability benefits are intended to make up for the lost income of a deceased parent or to pay for special services, equipment, or therapy related to the child's disability. A child deemed eligible for benefits is required to have a representative payee to receive and manage the funds in their best interest.<sup>2</sup> When a child is at home or with family, the parent or guardian is first priority to serve in this fiduciary role.<sup>3</sup>

When a child enters foster care, however, a very different process is set in motion. State and county agencies in nearly every jurisdiction in the country routinely screen (or as some have characterized the process, "mine") every incoming youth for disability and death benefits.<sup>4</sup> This mining is often conducted by private for-profit revenue-generating corporations which essentially serve to "shake down" incoming youth to assess their financial worth with an eye on minimizing the state's financial obligations for the child.<sup>5</sup> If a child is deemed eligible for any of these benefits, the agency often automatically applies for the benefits and to serve as the representative payee.<sup>6</sup> This happens without notice or any effort to identify another representative payee (a relative, family friend, community leader) who could manage the funds in the child's best interest, as required by law. The Social Security Administration (SSA) clearly states

2 Social Security Administration. "Frequently Asked Questions (FAQs) for Representative Payees." Available at: <https://www.ssa.gov/payee/faqrep.htm?tl=7>.

3 Social Security Administration. "GN 00502.105 Preferred Representative Payee Order of Selection Charts." *Program Operations Manual System (POMS)*. Available at: <https://secure.ssa.gov/poms.NSF/lnx/0200502105>.

4 Hatcher, Daniel. "Stop Foster Care Agencies from Taking Children's Resources." *Florida Law Review Forum*. Vol. 71(1) (2019). Available at: [http://www.floridalawreview.com/wp-content/uploads/Hatcher\\_Publish.pdf](http://www.floridalawreview.com/wp-content/uploads/Hatcher_Publish.pdf) ("agencies are monetizing vulnerable children. In Florida, a contract describes 'data mining techniques' to 'score' and 'triage' foster children to maximize revenue. In Maryland, an assessment report by MAXIMUS, Inc. describes foster children as a 'revenue generating mechanism.'")

5 White, Gillian B. "When Poverty is Profitable." *The Atlantic*. (June 22, 2016). Available at: <https://www.theatlantic.com/business/archive/2016/06/poverty-industry/487958/>.

6 See Boyer, Bruce & Matthews, Martha. "Should Agencies Apply for and Receive SSI on Behalf of Foster Children?" *Youth Law News*, Vol. XX No. 6 (Nov-Dec 1999); U.S. Government Accountability Office. "Social Security Administration: New Data Exchanges with Some States Provide Limited Information on Foster Care Beneficiaries." (June 3, 2021). Available at: <https://www.gao.gov/products/gao-21-441r>.



in their policy directives that the state agency is the last of seven options on their preference list and is the payee of last resort after all other resources are ruled out.<sup>7</sup>

***Do not routinely appoint the foster care agency as payee for a child in foster care. Gather all pertinent information and make a thoughtful and careful choice and decide each case on its own merit. Your primary concern must be that the person, agency or organization you select as payee will best serve the interest of the child.***<sup>8</sup>

This is not consistent with state practice nationwide, as reported recently by the Government Accountability Office.<sup>9</sup> Once the benefit checks start arriving to the agency (they can range up to more than \$800/month), the agency payee deposits the entire check into state accounts — sometimes general child welfare accounts, sometimes general accounts unrelated to child welfare.<sup>10</sup> Rarely are the funds attached to spending for that beneficiary.<sup>11</sup> The money is neither used for individualized services for the child, nor conserved for their future use. And if a youth in foster care is eligible for benefits and also has money saved from a job, a gift, a bequest, or high-value asset such as a car, the agency may move to seize all their assets beyond \$2,000 — purportedly to maintain the child's eligibility for these means-tested benefits — and then pockets those assets too. Not only does this violate basic premises of ethics and common sense, it violates federal law which specifically requires agencies to “help prepare youth emancipating from the foster care system for self-sufficiency and independent living.”<sup>12</sup>

Approximately 10% of children in foster care receive SSI benefits.<sup>13</sup> Research indicates that closer to 20% of children in care have conditions that would likely qualify them for SSI<sup>14</sup>, which translates to 40,000-120,000 impacted children in any given year.<sup>15</sup> Disability benefits can total about \$9,200 annually per child. The Congressional Research Service estimates that states intercept roughly \$258 million in Social Security benefits of foster children each year.<sup>16</sup> In spite of federal legislation in 2018<sup>17</sup> requiring data collection and sharing, the Administration for Children and Families (ACF) has failed to collaborate with the Social Security Administration to produce reliable national data on this practice. A 2021 GAO report sampling data on 11 states identified over 5,500 errors in appointment of a representative payee.<sup>18</sup>

7 Social Security Administration. “GN 00502.105 Preferred Representative Payee Order of Selection Charts.” *Program Operations Manual System (POMS)*. Available at: <https://secure.ssa.gov/poms.NSF/lrx/0200502105>.

8 Social Security Administration. “GN 00502.159 Additional Considerations When Foster Care Agency is Involved.” *Program Operations Manual System (POMS)*. Available at: <https://secure.ssa.gov/poms.nsf/lrx/0200502159>.

9 See, *supra*, footnote 6, available at: <https://www.gao.gov/products/gao-21-441r>.

10 Hatcher, Daniel. “Foster Children Paying for Foster Care.” 27 *Cardozo L. Rev.* 1797 (2006). Available at: [https://scholarworks.law.ubalt.edu/cgi/viewcontent.cgi?article=1293&context=all\\_fac](https://scholarworks.law.ubalt.edu/cgi/viewcontent.cgi?article=1293&context=all_fac).

11 *Id.*

12 45 C.F.R. §1355.25 (c).

13 See, *supra*, footnote 1, available at: <https://www.npr.org/2021/04/22/988806806/state-foster-care-agencies-take-millions-of-dollars-owed-to-children-in-their-ca>.

14 Moulta-Ali, Umar, Fernandes-Alcantara, Adrienne L., & Stoltzfus, Emilie. “Child Welfare: Social Security and Supplemental Security Income (SSI) Benefits for Children in Foster Care.” *Congressional Research Service*. (September 28, 2012). Available at: [https://greenbook-waysandmeans.house.gov/sites/greenbook-waysandmeans.house.gov/files/2012/documents/RL33855\\_%20v3\\_gb\\_0.pdf](https://greenbook-waysandmeans.house.gov/sites/greenbook-waysandmeans.house.gov/files/2012/documents/RL33855_%20v3_gb_0.pdf).

15 U.S. Department of Health and Human Services, Administration for Children and Families, Administration on Children, Youth and Families, Children's Bureau. “Adoption and Foster Care Analysis and Reporting System (AFCARS) FY2019 data.” No. 27. Available at: <https://www.acf.hhs.gov/sites/default/files/documents/cb/afcarsreport27.pdf>.

16 See, *supra*, footnote 14, available at [https://greenbook-waysandmeans.house.gov/sites/greenbook-waysandmeans.house.gov/files/2012/documents/RL33855\\_%20v3\\_gb\\_0.pdf](https://greenbook-waysandmeans.house.gov/sites/greenbook-waysandmeans.house.gov/files/2012/documents/RL33855_%20v3_gb_0.pdf).

17 Pub. L. No. 115-165. Available at: <https://www.congress.gov/bill/115th-congress/house-bill/4547>.

18 See, *supra*, footnote 6, available at: <https://www.gao.gov/products/gao-21-441r>.



The disability and death benefits of youth in foster care across the country are being applied for, received, and spent by child welfare agencies without any notice to the child or their attorney, without any due process or opportunity to intervene, without an accounting for the funds, and with no regard for the particular current or future best interest of the individual beneficiary.

## WHY DOES THIS HAPPEN?

As sinister as the practice sounds, it is in most instances not a deliberate coordinated effort to defraud youth in foster care. It is, however, an insidious long-standing revenue maximization strategy for states, who in most instances understand that they may not “double-dip” into both IV-E and SSI benefits, and that SSI provides more money to states without requiring state matching.<sup>19</sup> But, of course, states are legally obligated to pay for foster care for every child that comes into care<sup>20</sup>, so choosing to supplant IV-E with SSI to pay for state costs related to foster care is from the outset an unlawful proposition. The state does not have authority to determine which categories of children coming into care they will and will not support. It seems plain that charging certain classes of foster youth for their own care while paying the full cost for the remainder of children in care creates equal protection issues.

Yet states, desperate to find ways to fill out their anemic budgets, understand how valuable these benefits are, and have grown accustomed to this practice, though it ultimately constitutes only about 1% of their budgets.<sup>21</sup> Agencies argue that their role in screening foster children for benefits is valuable to the child's present and future well-being and that they may not be sufficiently motivated to continue screening without recouping their investment.<sup>22</sup> Agencies further argue that because most of these benefits are means-tested, precluding the accumulation of assets beyond modest caps, they are doing youth a favor by obtaining and preserving eligibility for benefits even if those dollars are not benefitting them now.

Because there is no notice or due process in most instances, and neither attorneys nor youth nor even judges are aware this is happening, there has been little pushback and few challenges to the practice. In the absence of legislation or caselaw prohibiting the practice, states surmise that it is allowable and it continues largely unabated across the country.<sup>23</sup>

## WHAT DOES THE LAW SAY?

There is no federal legislation expressly permitting or prohibiting the practice of states' interception of foster youth benefits. Three bills have been introduced in Congress since 2007,<sup>24</sup>

<sup>19</sup> See, *supra*, footnote 10, available at: [https://scholarworks.law.ubalt.edu/cgi/viewcontent.cgi?article=1293&context=all\\_fac](https://scholarworks.law.ubalt.edu/cgi/viewcontent.cgi?article=1293&context=all_fac).

<sup>20</sup> Federal law under Title IV-E requires states to cover “foster care maintenance payments” for each child removed into care using state funds. 42 U.S. Code § 6729(a). The structure is intended so that states pay foster care maintenance with state funds, and may then claim a IV-E federal match for eligible children.

<sup>21</sup> Shapiro, Joseph. “Consultants Help States Find And Keep Money That Should Go To Foster Kids.” *NPR*. (April 28, 2021). Available at: <https://www.npr.org/2021/04/28/991503850/consultants-help-states-find-and-keep-money-that-should-go-to-foster-kids>.

<sup>22</sup> See, *supra*, footnote 4, available at: [http://www.floridalawreview.com/wp-content/uploads/Hatcher\\_Publish.pdf](http://www.floridalawreview.com/wp-content/uploads/Hatcher_Publish.pdf).

<sup>23</sup> There are a few exceptions to this. Florida has established clear notice provisions through their Master Trust program. Allegheny County states that its agency does not screen incoming foster youth for benefits, and thus does not apply for appointment as representative payee. Cook County, IL is under a continuing consent decree requiring notice in these cases. See, *supra*, footnote 6, available at: <https://www.gao.gov/products/gao-21-441r>.

<sup>24</sup> H.R. 1104 (110th): Foster Children Self-Support Act. Available at: <https://www.govtrack.us/congress/bills/110/hr1104/cosponsors>.

most recently the Protecting Foster Youth Resources to Promote Self-Sufficiency Act of 2016,<sup>25</sup> which would not only require proper notice and due process to all children and their legal representatives, but prohibit states from using the funds to supplant their own fiscal obligations. Champions in Congress plan to reintroduce the bill. To date, Maryland is the only state to pass legislation limiting the practice. The 2018 Protecting the Resources of Children in State Custody Act<sup>26</sup> was championed by then Maryland state Senator and now U.S. Representative Jaime Raskin who stated to NPR, “This is like confiscating someone’s Social Security benefits because they availed themselves of the fire department.”<sup>27</sup> In 2021, Texas introduced similar legislation.<sup>28</sup> Nebraska is gearing up to be next.<sup>29</sup>

In 2003, the U.S. Supreme Court heard *Washington State Dep’t of Social and Health Services v. Keffeler*<sup>30</sup> — a case widely misconstrued to justify this continued practice. In *Keffeler*, the Supreme Court held that Washington State did not violate the anti-attachment provision of the Social Security Act by using children’s Social Security benefits for foster care costs.<sup>31</sup> The Court concluded that state agencies could not be deemed creditors to children in care<sup>32</sup>, which seems an obvious conclusion given that foster children owe no debt for the cost of their care. The Court explicitly declined to address claims related to due process, breach of fiduciary duties, and other claims, encouraging these claims to be brought to the Social Security Administration or via subsequent litigation:

*Respondents also go beyond the § 407(a) [anti-attachment provision] issue to argue that the department violates § 405(j) itself, by, for example, failing to exercise discretion in how it uses benefits, periodically “sweeping” beneficiaries’ accounts to pay for past care, and “double dipping” by using benefits to reimburse the State for costs previously recouped from other sources. These allegations, and respondents’ § 405(j) stand-alone arguments more generally, are far afield of the question on which we granted certiorari.... Accordingly, we decline to reach respondents’ § 405(j) arguments here, except insofar as they relate to the proper interpretation of § 407(a). Respondents are free to press their stand-alone § 405(j) arguments before the Commissioner, who bears responsibility for overseeing representative payees, or elsewhere as appropriate.*<sup>33</sup>

Challenges in state courts, however, have resulted in orders questioning the constitutionality of the practice or directing at least a portion of children’s benefits for actual current or future needs of the child. The North Carolina Court of Appeals affirmed a judge’s order that a portion of a transition aged youth’s benefits be used to pay the mortgage on the house left to him by

25 H.R.5737: Protecting Foster Youth Resources to Promote Self-Sufficiency Act. Available: <https://www.congress.gov/bill/114th-congress/house-bill/5737/text>.

26 Md. Code Ann., Fam. Law § 5-527. Available at: <https://casetext.com/statute/code-of-maryland/article-family-law/title-5-children/subtitle-5-child-care-foster-care/part-iii-child-welfare-services-foster-care/section-5-5271-protection-of-resources-of-child-in-state-custody>.

27 See, *supra*, footnote 1, available at: <https://www.npr.org/2021/04/22/988806806/state-foster-care-agencies-take-millions-of-dollars-owed-to-children-in-their-ca>.

28 Texas House Bill 4244. Available at: <https://legiscan.com/TX/text/HB4244/2021>.

29 “Editorial: Nebraska must stop seizing foster children’s Social Security benefits.” *Omaha World-Herald*. (June 8, 2021). Available at: [https://omaha.com/opinion/editorial/editorial-nebraska-must-stop-seizing-foster-childrens-social-security-benefits/article\\_40bfd176-c555-11eb-a7fa-0763a5843df4.html?utm\\_medium=email&utm\\_source=govdelivery](https://omaha.com/opinion/editorial/editorial-nebraska-must-stop-seizing-foster-childrens-social-security-benefits/article_40bfd176-c555-11eb-a7fa-0763a5843df4.html?utm_medium=email&utm_source=govdelivery).

30 537 U.S. 371 (2003).

31 *Id.* at 372.

32 *Id.* at 382.

33 *Id.* at 389, fn.12.

his adoptive father, which was on the verge of going into foreclosure.<sup>34</sup> In Maryland, a court concluded that the state violated a youth's constitutional due process rights by applying for and taking his benefits without notifying him or his lawyer.<sup>35</sup> An Alaska court recently enjoined the state from violating the due process rights of children in foster care by applying to receive their disability and survivor benefits without proper notice and opportunity to intervene.<sup>36</sup>

## WHAT'S THE ANSWER?

Practices shrouded in secrecy are most compromised by sunlight. By becoming aware of this practice, knowing the law, sharing that knowledge, counseling your clients on their rights and options, and raising the matter in court, you can play a role in stemming this injustice. Ultimately, state legislatures, courts, and Congress must act to explicitly prohibit this unethical and illegal practice. In the meantime, attorneys on the ground and stakeholders across the field have a meaningful opportunity to make an impact case by case.

## BE INFORMED AND ROUTINELY ASK QUESTIONS IN COURT

- The most direct and impactful opportunity for attorneys and court-involved child welfare professionals is also the simplest: ASK. Ask the agency:
  - ✓ Has the agency screened your client for any of these benefits?
  - ✓ Has the child or youth qualified for one of these classes of benefits?
  - ✓ Has the agency applied to serve as representative payee?
  - ✓ Has the agency provided notice as required?
  - ✓ Has the agency documented their efforts to identify another representative payee (a natural or adoptive parent, relative, close friend) higher up on the preference list?<sup>37</sup>
  - ✓ Has the agency properly fulfilled their obligations as fiduciaries? Can they document use of the child's benefits in their best interests, according to their individual and future needs?<sup>38</sup>

## REVIEW CASELOADS AND ENGAGE YOUR CLIENTS

- Assess your caseload and determine the extent to which this issue impacts your clients. Propose that your colleagues do the same.
- Counsel your clients and empower them with information about their rights, the law, and options to hold agencies accountable and prevent future harm.

<sup>34</sup> *In re J.G.*, 186 N.C.App. 496, 512, 652 S.E.2d 266 (2007).

<sup>35</sup> *In re Ryan W.*, 434 Md. 577, 76 A.3d 1049 (2013). See also Hatcher, Daniel, "How Maryland robs its most vulnerable children." *The Baltimore Sun*. (October 14, 2013). Available at: <https://www.baltimoresun.com/opinion/op-ed/bs-ed-foster-care-maryland-20131013-story.html>.

<sup>36</sup> *Z.C. v. State*, Case No. 3AN-14-07961 CI (Alaska Super Ct. Oct. 22, 2021) (unpublished opinion) (pending appeal); see also Verge, Beth, "Court finds state improperly managed foster kids' money." *Alaska's News Source*. (September 4, 2019). Available at: <https://www.alaskasnewsresource.com/content/news/Court-finds-OCS-Alaska-foster-kids-Social-Security-monies-559405261.html>.

<sup>37</sup> For the enumerated list of SSA payee preferences, see Social Security Administration, "GN 00502.105 Preferred Representative Payee Order of Selection Charts." *Program Operations Manual System (POMS)*. Available at: <https://secure.ssa.gov/poms.NSF/lnx/0200502105>.

<sup>38</sup> For the duties of a representative payee, see Social Security Administration, "GN 00502.159 Additional Considerations When Foster Care Agency is Involved." *Program Operations Manual System (POMS)*. Available at: <https://secure.ssa.gov/poms.nsf/lnx/0200502159>.





- Work with your client to identify a family member or trusted friend who may be willing to serve as the representative payee and apply for a change of payee. Counsel your client and any new payee on use, records, and accountability for the funds.
- If no other payee can be identified, document how current or conserved benefits could actually serve your client's best interest by providing support for ongoing physical or mental health needs, educational plans, or basic needs when they exit care and advocate for orders directing such use of the funds.
- Encourage youth who want to share their stories and advocate for change.

### MEDIA MATTERS

- In 2021, National Public Radio and the Marshall Project partnered on a multi-part investigative series on the interception of foster children's federal benefits. The first piece<sup>39</sup> provides an excellent overview of the practice as a whole and highlights the impact on several young people in Alaska. The second piece<sup>40</sup> outlines how young people are recouping some of their intercepted benefits, and the third article<sup>41</sup> covers how private for-profit companies are mining children for benefits.
- Work with impacted clients interested in highlighting egregious cases to your local media outlets. Nothing increases public awareness and political pressure like a good investigative report.

### TAKE IT TO COURT

- This issue is ripe for litigation at all levels. Some attorneys have successfully had their clients' benefits restored to them. Others such as the recent case in Alaska, have involved certified class actions against the state as a whole.
- Litigators and advocates suggest that claims could focus on anything from due process to theft to conversion to takings to fraud and beyond. Carefully pick a strong case, consult with a law firm that engages in pro-bono public interest practice, and check in with experts in legal reform through the courts.

### CLEAR THE PATH FOR SPECIALIZED ACCOUNTS

- Financial vehicles exist to preserve eligibility for youth and conserve their benefits. The use of Individual Development Accounts (IDAs), for example, provide a mechanism to set aside some or all of a foster youth's benefits without that money being considered as income or resources used to determine or preserve benefits.<sup>42</sup>

39 See, *supra*, footnote 1, available at: <https://www.npr.org/2021/04/22/988806806/state-foster-care-agencies-take-millions-of-dollars-owed-to-children-in-their-ca>.

40 Shapiro, Joseph. "Movement Grows for States to Give Back Federal Funds Owed to Foster Children." *NPR*. (May 3, 2021). Available at: <https://www.npr.org/2021/05/03/992993650/movement-grows-for-states-to-give-back-federal-funds-owed-to-foster-children>.

41 See, *supra*, footnote 21, available at: <https://www.npr.org/2021/04/28/991503850/consultants-help-states-find-and-keep-money-that-should-go-to-foster-kids>.

42 Social Security Administration. Spotlight on Individual Development Accounts – 2021. Available at: <https://www.ssa.gov/ssi/spotlights/spot-individual-development.htm>.



- Many states have their own variety of these accounts such as Special Needs Trusts,<sup>43</sup> Master Trusts,<sup>44</sup> or other vehicles established which allow benefits to be held in trust for or used for a beneficiary without impacting eligibility.
- Advocate in your county/state for easy access to specialized accounts to conserve benefits and technical assistance to maintain them.

## BE A CHANGEMAKER

- Advocates in many states are already or may be interested in addressing this through policy changes, regulations, or state legislation. Check in with allies who have succeeded in other states. Appeal to veterans' rights champions by highlighting the impact of this practice on surviving children of U.S. servicemembers.
- Incorporate these questions and interventions into your and your office's practice and maintain ongoing recordkeeping of the numbers of impacted clients.
- Contact your member of Congress to flag egregious experiences of their constituents and express support for legislative change. Agencies should be required to continue screening children for benefits and offer to serve as the representative payee when there is no one higher up on the list able to serve. But the benefits should be used as required in the child's, not the agency's, best interest.

## CONCLUSION

Children and youth coming into foster care with a physical or mental disability, or after having lost a parent have more than enough challenges facing them. Federal disability and survivor benefits are intended to assist them with their immediate needs or be conserved to ensure a modicum of stability in the absence of a parent. They are for the benefit of the child, not the state. Rooting out this unscrupulous practice will rectify a long-standing injustice, pave the way for greater economic stability for this population of youth in foster care, and move us further towards a child welfare system worthy of the children it serves. ■

43 Maryland Department of Human Services. "Protecting the Resources of Children in Custody." SSA/CW #19-6. (October 1, 2018). Available at: <https://dhs.maryland.gov/documents/SSA%20Policy%20Directives/Child%20Welfare/SSA%2019-06%20CW%20Protecting%20Resources%20of%20Children%20in%20Custody.pdf>.

44 "Master Trust Issues for Children and Youth in Foster Care." Available at: [http://www.gpiflorida.org/webshow/episodes/s3/handouts/ep9-Ch19\\_Master\\_Trust\\_Issues\\_for\\_Children\\_and\\_Youth\\_in\\_Foster\\_Care.pdf](http://www.gpiflorida.org/webshow/episodes/s3/handouts/ep9-Ch19_Master_Trust_Issues_for_Children_and_Youth_in_Foster_Care.pdf).