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NATIONAL CLEARINGHOUSE  
FOR LEGAL SERVICES

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

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H. STUART CLINNINGHAM  
UNITED STATES DISTRICT COURT

Jacqueline Fields, James Norman,  
and Paulette Patterson  
on their own behalf; and  
on behalf of all others  
similarly situated,  
  
Plaintiffs,  
  
vs.  
  
GORDON JOHNSON, Director, Illinois  
Department of Children and Family  
Services  
  
Defendant.

No.

8901624

MAGISTRATE GOTTSCHALL

COMPLAINT

INTRODUCTORY STATEMENT

1. (a) Plaintiffs in this 42 U.S.C. §1983 class action suit are impoverished parents and legal guardians who have lost, are at risk of losing, will lose, or cannot regain custody of their children from the Illinois Department of Children and Family Services ("DCFS") because they are homeless or unable to provide food or shelter for their children. Defendant is the Director of the Illinois Department of Children and Family Services.

(b) Plaintiffs challenge defendant's policies and practices of (1) taking and retaining custody of children from impoverished parents and legal guardians because of their inability to obtain cash, food, shelter, or other subsistence, while failing to assist the parents and children to meet to these needs; (2) failing to assist them to secure cash, food, shelter or other subsistence through the coordination of services to

needy families and otherwise; (3) failing to make reasonable efforts to prevent removal of plaintiffs' children and reunite families; and (4) abridging the liberty and property interests of parents in retaining custody of their children and maintaining the means to support themselves and their families. Plaintiffs allege that these policies and practices violate provisions of Title IV-B and IV-E of the Social Security Act, as amended by the Adoption Assistance and Child Welfare Act of 1980, 42 U.S.C. §620 et seq. and 671 et seq., and the First and Fourteenth Amendments to the United States Constitution. Plaintiffs and plaintiff class members seek declaratory and injunctive relief.

#### JURISDICTION

2. Jurisdiction of this cause is premised upon 28 U.S.C. §1331 and 1343(3). Declaratory relief is authorized by 28 U.S.C. §2201 and Fed. R. Civ. P. 57.

#### PARTIES

3. Plaintiff Jacqueline Fields is a citizen of the United States and a resident of Chicago, Illinois. She is the mother of Latasha, age 14, Addarrel, age 12, Latrice, age 11, Chermaine, age 7, Shana, age 4, and Roy, age 3.

4. Plaintiff James Norman is a citizen of the United States and a resident of Chicago, Illinois. He is the father of Jamie, age 10, and Lynetta, age 12. The children's mother is deceased.

5. Plaintiff Paulette Patterson is a citizen of the United States and a resident of Chicago, Illinois. She is the mother of Antonia, age 10, Deandre, age 9, and Richard, age 7.

6. The named plaintiffs bring this action on their own behalf and on behalf of all persons similarly situated pursuant to Fed. R. Civ. P. 23(a) and (b)(2). The members of the plaintiff class ("plaintiffs") include:

All parents and legal guardians:

(a) whose children on or after January 1, 1988 have been, are, or will be in the temporary custody of the Illinois Department of Children and Family Services ("DCFS") or under its legal guardianship; and such parents and legal guardians upon whom DCFS has imposed, in a service plan or otherwise, a condition that such parent or legal guardian secure for themselves and their children such shelter, utility services, food, clothing, or income as DCFS deems necessary or appropriate for the return of their children; or

(b) for whom, or after January 1, 1988, there has been, is, or will be an "indicated" report pursuant to Ill. Rev. Stat. 23 §§2051 et seq. of "inadequate shelter," "inadequate food," "inadequate clothing," or "environmental neglect," or a service plan requiring that such parent or legal guardian secure adequate shelter, utility services, food, clothing, or income meet these or other subsistence needs.

7. There are, at any one time, hundreds of class members throughout the state. Because many class members lack permanent housing, and because the class is so numerous, joinder of all members is impracticable. There are questions of law and fact common to the class. The claims of the named plaintiffs are

typical of those of the class, and the named plaintiffs will fairly and adequately represent the class members. They have no interests antagonistic to the class; they seek relief which will benefit all class members and they are represented by counsel who are experienced at prosecuting class actions and representing parents and children to secure their constitutional and statutory rights. Finally, defendant has acted and refused to act on grounds generally applicable to the class, thereby making injunctive and declaratory relief appropriate for the class as a whole.

8. Defendant GORDON JOHNSON is the Director of DCFS. It is his duty to insure that DCFS complies with the requirements of the Adoption Assistance and Child Welfare Act of 1980, its implementing regulations and the United States Constitution. He is sued in his official capacity.

#### THE CHILD WELFARE SYSTEM IN ILLINOIS

9. When any person makes a complaint to the DCFS Hotline that a child in Illinois is lacking necessary care, including adequate shelter, food, or clothing, DCFS must immediately investigate that claim and determine whether it is founded in fact. If credible evidence of that complaint is found, the report is "indicated".

10. Defendant maintains a unit of investigative caseworkers to respond to child abuse and neglect complaints. This unit is called the Division of Child Protection (DCP). These DCP workers are empowered by state law to take protective custody of

neglected children.

11. Children reported "neglected" due to inadequate shelter, food, clothing or other subsistence often are taken into the protective custody of DCFS, though some such children are allowed to remain with their families. Those allowed to remain with their families, however, are at risk that DCFS may later seek protective custody of them.

12. Within 48 hours of taking protective custody, DCFS must have a "petition for adjudication of wardship" filed in juvenile court. If DCFS is awarded temporary custody, or later, guardianship of a child, it has the right to place the child with a caretaker other than the parent. This placement is referred to as "foster care." DCFS pays regular foster care providers \$200-\$300 per month per child. Specialized foster care providers (for children with special needs) may receive more money for the care they provide, as much as \$100 per day per child.

13. Unless parents lose their parental rights as a result of a judicial decree terminating parental rights, they may petition at any time for return of their children. DCFS makes recommendations concerning such return of children. Such recommendations routinely include evaluations as to whether the parent has adequate shelter and adequate income to provide for the children. If a DCFS caseworker believes the parent has inadequate shelter or income, DCFS routinely recommends against returning the child home.

THE ADOPTION ASSISTANCE AND CHILD WELFARE ACT

14. Titles IV-B and IV-E of the Social Security Act (the "Act"), 42 U.S.C. §§620 et seq. (Title IV-B) and 670 et seq. (Title IV-E), as amended by the Adoption Assistance and Child Welfare Act of 1980, provide federal funding for the state administered foster care program and for services to families to avoid the need for foster care.

15. Illinois receives more than \$141 million under Title IV-B and also receives millions of dollars in Title IV-E funds. As such, it must comply with the Act and its implementing regulations.

16. DCFS is the single state agency designated in Illinois to administer and oversee the state's compliance with Title IV-B and IV-E state plans.

17. Under Title IV-B, Illinois must:

(a) have in effect policies and practices designed: 1) to prevent the unnecessary separation of children from their families, 42 U.S.C. §§625(a)(1)(C); and 627(b)(3); 2) to restore children to their families through the provision of child welfare services, §625(a)(1)(D) and §627(a)(2)(C); and 3) to prevent or remedy problems which may result in neglect, abuse and dependency, §625(a)(1)(B) and 45 C.F.R. §§1357.15 (e)(1) and (2).

(b) coordinate programs and services under Title IV-A, IV-E, and XX of the Act, with a view to providing those welfare and related services for children and their families which will best promote their welfare. 42 U.S.C. §622(b)(2).

(c) have in effect an individualized case plan for each child in foster care that details appropriate services to be provided to the parent, child and foster parents in order to improve the conditions that led to removal of the child and to achieve family reunification. 42 U.S.C. §§671(a)(4) and 675; 42 U.S.C. 627(a)(2)(B).

(d) provide written notices to parents and a right to a fair hearing when the agency denied benefits to them. 45 C.F.R. §1355.30(k).

18. Under Title IV-E, Illinois must:

(a) make reasonable efforts to prevent the need for removal of a child from his or her family or to make it possible for the child to be reunited with his or her family if the child has been removed. 42 U.S.C. §671(a)(15) and 45 C.F.R. §1356.21(b).

(b) have in effect an individualized case plan for each child in foster care which details appropriate services to be provided to the parents, child and foster parents in order to improve the conditions leading to placement of the child and to achieve family reunification. 42 U.S.C. 675(1).

(c) have in effect a case review system containing procedural safeguards. 42 U.S.C. §671(a)(16), §675(5)(c) and 45 C.F.R. §1356.21 (d)(4).

(d) provide for coordination of services with other state programs, including assistance under Title IV-A and Title XX. 42 U.S.C. §671(a)(4).

(e) provide written notices to parents and a right to a

fair hearing when the agency denies benefits to them. 42 U.S.C. §671(a)(12) and 45 C.F.R. §1355.30(k).

**ILLINOIS CASH, FOOD, HOUSING AND UTILITIES ASSISTANCE  
PROGRAMS FOR INDIGENT PARENTS**

19. Illinois, through the Illinois Department of Public Aid ("IDPA"), participates in the federally-funded Aid to Families with Dependent Children Program (AFDC), 42 U.S.C. §601 et seq. The purpose of this program is to provide subsistence benefits to indigent children and the "caretaker relatives" residing with them who meet the eligibility requirements for the program.

20. In Illinois, IDPA also administers three emergency assistance funds to provide cash assistance to families with special needs and to keep families together. These funds provide, inter alia, assistance to forestall eviction, security deposits for homeless families, as well as assistance to secure replacement furniture, stoves and refrigerators and other basic necessities for families. AFDC PO §1300 et seq.

21. Parents whose children are removed from their custody by DCFS for more than one month lose eligibility for AFDC. While the parents whose children have been taken from them may be eligible for the state or locally-funded General Assistance (GA) program, the GA benefit levels are much lower than those for AFDC. For example, while AFDC provides benefits of \$250 for a mother and child in Chicago and slightly less in other parts of the state, GA provides benefits of only \$154 per month for a single adult, and much less in those parts of the state whose GA programs are not state-funded. Indeed, many localities provide



no cash GA at all. An adult cannot requalify for AFDC unless she regains actual custody of the children.

22. Illinois administers the federally-funded food stamp program through the IDPA. The purpose of the food stamp program is to alleviate hunger and malnourishment in low-income households. 7 U.S.C. §2011. Under this program, a family's food budget is supplemented by coupons redeemable for food. 7 U.S.C. §2011 et seq.

23. The Illinois Department of Public Health administers the Women, Infants and Children (WIC) food supplement program. This program provides food for "high risk" mothers, pregnant women infants and children. Under this program, coupons are provided to eligible women which can be used for milk, cheese, eggs and other highly nutritional foods. 42 U.S.C. §1786; 7 C.F.R. §246.

24. (a) Through a variety of funding mechanisms, the United States Department of Housing and Urban Development provides funding for public housing and subsidized housing for low income families. These programs include the Public Housing Program, the Section 8 Housing Program, the Rent Supplement Program, the Section 221(2)(3) Program, the Section 236 Program, and the Housing Voucher Program. 24 U.S.C. §§1437 et seq.; 12 U.S.C. §§1701s, 1715(d)(3), 1715z-1.

(b) The Illinois Housing Development Authority provides subsidized housing for low-income families in Illinois through several funding mechanisms, some of which are entirely independent of federal funds, such as state bond issuances. Ill.

Rev. Stat. ch. 67 1/2, §§301 et seq.

(c) Homeless families, families living in substandard housing, and families paying more than 50% of income in rent are entitled by law to priority placement in public housing. 24 C.F.R. Parts 215, 880-884, 886 and 960 (1988).

(d) Public housing authorities throughout the state are chartered under Ill. Rev. Stat. ch. 67 1/2, §§1 et seq. and provide low-income housing. The Chicago Housing Authority, for example, operates approximately 26,000 units of public housing reserved for low-income families. Approximately 6,000 of those units are vacant. In some of the projects of the Chicago Housing Authority, the waiting list for these is as short as one or two months.

25. Illinois administers the Illinois Home Energy Assistance Program (IHEAP) which is a cash assistance program, providing funds to low-income persons to pay utility bills and to enable persons without utility service to be reconnected. The Illinois Residential Affordable Payment Plan (IRAPP) is a bill-payment program that protects enrolled households from utility disconnection in the winter if they make certain percentage payments on their utility bills.

26. DCFS also has established two funds to meet the subsistence needs of families: the privately funded Harris Fund, which can make grants of \$350 or more for families in need of funds to reunite their families, and the statutorily-created and state-funded Family Services Emergency Assistance Fund which can

provide up to \$500 each year for families in economic crisis to prevent dissolution or to promote family reunification. Ill. Rev. Stat. ch. 23 §5005.

27. DCFS also administers the Title XX day care program in Illinois which provides subsidized child care to low-income families.

28. In addition to publicly-funded subsistence programs, there are hundreds of private charitable programs in Illinois providing food, cash, clothing and shelter assistance to needy families.

DEFENDANT'S POLICIES AND PRACTICES CONCERNING POOR FAMILIES

29. Under defendant's policy and practice:

(a) DCP removes children from their houses without determining whether provision of the family subsistence needs would enable the child to remain safely at home, and without providing or arranging for provision of such subsistence in appropriate cases.

(b) DCP does not assist families found "neglectful" because they lack cash, food, shelter or other subsistence in securing such cash, food, shelter, or other subsistence through provision of benefits or referral for benefits and services;

(c) DCP routinely removes children from their parents due to homelessness or other conditions caused by poverty alone.

30. Under defendant's policy and practice, DCFS:

(a) authorizes its workers to: intervene to terminate parents' tenancies or other housing arrangements, place parents

and families in housing facilities that DCFS itself deems inadequate, and to act to cause reductions in assistance available to the family even when parents have custody of their children;

(b) routinely fails to assist parents in applying for the programs described in §§19-28 supra;

(c) maintains no coordinated program of assistance to poor families to remedy the deprivation of shelter, food, clothing, child care or other subsistence that led to an indicated report or removal of children from their homes;

(d) fails to maintain referral lists for available shelter, utility assistance, food, and cash assistance from other public and private agencies;

(e) routinely fails to provide needed documents to plaintiff class members to enable them to demonstrate their eligibility for federal, state, and local assistance programs, even when plaintiffs themselves take all steps to qualify for available benefits;

(f) routinely requires that plaintiff class members discover and procure shelter, utility services, food, clothing, child care or other provisions that they cannot afford, as a condition of retaining or obtaining custody of their children. Defendant's determination of what constitutes "adequate" housing is left to individual caseworkers, without any written standards;

(g) routinely delays notifying IDPA and public housing authorities of the intended or actual return of plaintiff

children. As a result, plaintiff class members' ability to requalify for assistance is delayed and their ability to reunite their families is imperilled for lack of AFDC or public housing benefits.

(h) by enforcement of the policies and practices described in subparagraphs (a) - (g) or otherwise, exacerbates plaintiffs' poverty and takes and retains custody of plaintiffs' children because of conditions caused solely by plaintiffs' poverty.

31. Defendant routinely:

(a) fails to notify plaintiffs concerning cash, child care and other benefits available from DCFS;

(b) when plaintiffs become aware of benefits available from DCFS and apply for such assistance, defendant does not notify them when benefits are denied or of their appeal rights;

(c) does not maintain a system allowing for a fair hearing or any other appeal or review when cash assistance, child care or coordinated services to secure cash, food, shelter or child care are denied.

#### THE PLAINTIFFS AND THE PLAINTIFF CLASS

##### JACQUELINE FIELDS

32. (a) Plaintiff Jacqueline Fields is the mother of six children. Except at those times DCFS has intervened to reduce her public aid, she has received AFDC benefits of \$481 for herself and her children. She lost custody of her youngest children, Roy and Shana, on December 28, 1987 after she entered a

drug rehabilitation program. The children's cousin reported her children to DCFS as "abandoned." The children were returned to Plaintiff Fields' custody on January 21, 1988, with a protective order. That order requires Plaintiff Fields to find suitable housing and to seek assistance from IDPA in securing additional beds for her children.

(b) Plaintiff Fields has attempted to locate suitable housing for her children. At the time her children were returned to her, in January, 1988 she was living in a four room apartment. Her DCFS worker found the apartment unsuitable because it was too small and told her to move. In October, 1988, she moved to an eight room apartment. Two weeks later, she learned that this building had been condemned. She then moved temporarily to a shelter until December 15. She found a five bedroom apartment and moved in shortly thereafter.

(c) Plaintiff Field's DCFS caseworker visited Plaintiff Field's apartment in mid-January 1989. Plaintiff Fields had left that same day to go to her public aid office in order to obtain vouchers for beds for her children. When Plaintiff Fields was not present, her DCFS caseworker told Plaintiff Field's landlord of her history with DCFS. The worker also told the landlord that she had seven children living there. As a result of this conversation, Plaintiff Field's landlord told her to vacate the apartment that day and he returned her January rent money.

(d) On or about January 12, 1989, Plaintiff Field's DCFS caseworker also called IDPA to inform her public aid

caseworker that Plaintiff Fields was not living at her apartment and that she was "mishandling her AFDC grant." As a result, in the first week of February, 1989, IDPA cancelled the family's AFDC grant.

(e) Plaintiff Fields has now found a five bedroom apartment which rents for \$390 per month. She cannot move into this apartment until she secures funds. She must wait 45 days for a decision on her renewed AFDC application, and she is likely to lose the apartment if she does not secure funds sooner.

(f) DCFS has acted to cut off Plaintiff Field's AFDC benefits and has caused her to move or be evicted several times. DCFS has never offered Plaintiff Fields any financial assistance or other assistance, including referral to secure housing or furnishings for her family. At the same time as it has acted to impair Plaintiff Field's tenancy, DCFS has insisted that Plaintiff Fields on her own secure "adequate housing" for herself and her six children.

g. Plaintiff Fields remains at risk that DCFS will remove her children from her custody due to her lack of adequate housing.

JAMES NORMAN

33. (a) Plaintiff James Norman became the sole caretaker of his two children when his wife died in October, 1987. Plaintiff Norman is a former steel and construction worker. After his wife's death, the family had a monthly household income of \$300 in Social Security benefits, occasionally supplemented by

Plaintiff Norman's wages when he could find part-time work. At one time, the family also received \$140 per month in AFDC, but IDPA, claiming an overpayment, cancelled the grant in August, 1988. Plaintiff Norman stopped receiving \$200 in Social Security benefits for his daughter in November, 1988.

(b) Plaintiff Norman could not meet all the household expenses, which included rent, utility bills, and medication for his heart condition. Since he could not pay for the mounting utility bills, the gas and electric service to his apartment was terminated. Plaintiff Norman had applied for an IHEAP grant to assist him with the utility bills in April of 1988, but he was told that it was too late in the year for him to obtain such assistance;

(c) Primarily because he was unable to pay his utility bills and maintain the gas and electric service in his apartment, DCFS accused Plaintiff Norman of "financial neglect" and removed his children from his custody on August 16, 1988. Before and after removing the children, DCFS offered Plaintiff Norman no help in securing cash assistance to maintain the utilities, nor did DCFS ever inform him of cash assistance programs for which he might qualify. DCFS also claimed that Plaintiff Norman was too often absent from the home and the children lacked sufficient supervision. Plaintiff Norman had been trying to increase his family's income and his job opportunities by attending auto mechanic classes at the Lincoln Technical Institute and also working part-time. Plaintiff Norman could not afford to pay for



child care services during the time he was attending classes. At no time did DCFS offer help to Plaintiff Norman with child care or other necessities.

(d) After DCFS took his children Plaintiff Norman had to give up his apartment and move into a cramped quarters with relatives. DCFS has told him that he must secure adequate housing and utility service in order to have his children returned to him. DCFS has given him no help however, in relocating housing. In addition, DCFS has never notified him of any funds or other assistance available to him and has not helped him to qualify for such assistance. Instead, DCFS has simply told him to get a job.

PAULETTE PATTERSON

34. (a) Plaintiff Paulette Patterson suffers from ataxia and is confined to a wheel chair. She has been adjudicated disabled by the Social Security Administration and currently receives Supplemental Security Income (SSI) payments in the amount of \$94 per month.

(b) In July 1983, Ms. Patterson, then receiving SSI and AFDC while caring for her three children, was evicted from her dilapidated apartment for non-payment of rent. She had been withholding rent in an effort to have the landlord make necessary repairs. At the request of DCFS, a church in Maywood, Illinois then housed Plaintiff Patterson and her children in a run-down hotel with no bathroom and no elevator. Shortly thereafter, DCFS informed Plaintiff Patterson that this housing was inadequate.

DCFS took custody of her three children on September 19, 1983.

(c) When the children were taken, Plaintiff Patterson was put out of the hotel and she lost her AFDC grant. Plaintiff Patterson had to live for four days in a park. When she asked her DCFS worker for help, the worker informed her that DCFS helps children, not parents. Ms. Patterson asked the Maywood church for help and eventually was admitted into a shelter.

(d) Once Plaintiff Patterson's children were removed from her and she became homeless, DCFS gave her no help in relocating housing. Her DCFS worker told her that she could neither see nor talk to her children until she located adequate housing.

(e) DCFS refused to permit any visitation with her children for three months. Thereafter, Plaintiff Patterson was permitted to visit her children for one hour per month. Over the strenuous objections of the plaintiff, and approximately six months after they had taken custody, DCFS placed the children with their maternal grandparents in Arkansas where they remain today. DCFS has failed to arrange any regular visitation between Plaintiff Patterson and her children.

(f) In the ensuing four years, DCFS has offered no cash assistance to Plaintiff Patterson and has not told her how she might qualify for any such assistance. DCFS has repeatedly insisted that plaintiff could not have her children returned until plaintiff secured adequate housing. DCFS has offered no assistance in procuring such housing.

(g) DCFS has spent over \$600 per month to maintain Plaintiff Patterson's children in foster care. DCFS has spent nothing to help Plaintiff Patterson locate or maintain an apartment in which she could be reunited with her children.

#### THE PLAINTIFF CLASS

35. Plaintiffs and members of the plaintiff class have lost custody of their children, or are at risk of losing custody or cannot regain custody because they lack money to provide care food, shelter or other care that DCFS considers necessary.

36. The policies described at paragraphs 29-31 have been applied to plaintiffs and the plaintiff class.

37. As a direct result of the policies and practices of the defendant as stated in paragraphs 29 through 31, the plaintiffs and the members of the plaintiff class have suffered and continue to suffer irreparable injury due to the threatened or the actual dissolution of their families. Plaintiffs' poverty has increased due to defendant's policies, leading to further irreparable injury. Plaintiffs have also suffered profound and irreparable emotional distress due to threatened or actual loss of custody of their children. There is no adequate remedy at law.

#### CLAIMS

38. The policies and practices described at paragraphs 29-31 violate:

(a) 42 U.S.C. §§ 627(a)(2)(c), 627(b)(2) and 45 C.F.R. §1357.15(e) which require that Illinois have in effect a service program designed to prevent placement and facilitate return of a

child to his or her family, where appropriate;

(b) 42 U.S.C. 622§§(b)(2) and 671 (a)(4) which require that DCFS child welfare services be coordinated with the IV-A, IV-E and Title XX program, and other related programs;

(c) 42 U.S.C. §§627(a)(2)(C), 671(a)(15), and 45 C.F.R. §1356.21(b) which require that reasonable efforts be made to prevent placement of children and reunite families;

(d) 41 U.S.C. §671(a)(16) and 45 C.F.R. §1356.21 (d)(4), which require the development of a written case plan for each child that will facilitate return of the child to his home; and

(e) The First and Fourteenth Amendments to the United States Constitution.

39. The policies and practices described in paragraph 31 violate:

(a) 42 U.S.C §627(a)(2)(B) and 42 U.S.C. §671 (a)(12), and 45 C.F.R. §1355.30(k) which require that the Illinois child welfare agency afford parents written notices and a right to a fair hearing when the agency denies benefits to them.

(b) The due process clause of the Fourteenth Amendment to the United States Constitution.

PRAYER FOR RELIEF

WHEREFORE, plaintiffs pray that this Court:

A. Declare that the defendant's policies and practices as described in paragraphs 29 through 31 violate 42 U.S.C. §§622(b)(2), 627(a)(2)(c), and (b)(2), 671 (a)(4), (12), (15) and (16), and 45 C.F.R. §1335.30(k), §1356.21 (b) and (d)(4),

1357.15(e), and the First and Fourteenth Amendments to the United States Constitution;

**B. Preliminarily and permanently enjoin defendant from:**

1. Maintaining policies and practices of removing children from impoverished parents instead of assisting them with cash, food, shelter, utilities or other subsistence or referring them for such assistance;
2. Intervening to terminate plaintiff's housing arrangements or subsistence benefits except pursuant to lawful requirements;
3. Failing to maintain or coordinate services and benefits available to plaintiffs with IV-A, IV-E, Title XX, and other programs related to child welfare;
4. Failing to adopt reasonable written standards as to the nature and quality of housing or other subsistence plaintiffs must secure in order to maintain or reunite their families;
5. Maintaining policies and practices of failing to assist plaintiffs promptly to qualify for assistance to which they may be eligible or impairing their eligibility for assistance;
6. Maintaining policies and practices of failing to notify plaintiffs immediately of cash, food, shelter, utility, child care and other services

available from DCFS, from other publicly-funded agencies and from local private agencies;

7. Maintaining policies and practices of failing to afford plaintiffs the opportunity to appeal the denial of subsistence benefits or other assistance;

C. Award the plaintiffs their costs and attorney's fees; and

D. Award plaintiffs such other relief as this Court deems just.

  
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