

Non-Parents: Custody, Visitation, and Support



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Bailes v. Sours, 231 Va. 96 (1986)

Facts and Trial Court Ruling:

After the death of Wayne Sours, the father of Michael Sean Sours, custody of Sean became contested between his natural mother, Frances Jean Bailes, and his stepmother, Carol Elaine Sours, who had raised Sean since infancy. Jean had consented to Wayne having custody in 1974 and had minimal contact with Sean during his childhood. Sean had lived continuously with his father and stepmother, forming a close maternal bond with Elaine, referring to her as his mother. After Wayne's death, Jean sought custody, but the circuit court awarded custody to Elaine. The court found that although Jean was a fit parent, the presumption favoring a natural parent was rebutted by clear and convincing evidence that it was in Sean's best interests to remain with Elaine.

Appellate Ruling and Legal Standard:

The Virginia Supreme Court affirmed the ruling and, in doing so, established a clear standard for when a nonparent may overcome the parental presumption in a custody dispute. The Court held:

“In a custody dispute between a parent and a non-parent, the law presumes that the child's best interests will be served when in the custody of its parent. This presumption is rebuttable, however, and may be overcome by clear and convincing evidence showing that (1) the parent is unfit; (2) there has been a previous order of divestiture; (3) there has been a voluntary relinquishment; (4) there has been abandonment; or (5) there are special facts and circumstances which constitute an extraordinary reason for taking the child from the parent.”

In Bailes, the Court found the fifth prong—special facts and circumstances constituting an extraordinary reason—was met. The Court emphasized the importance of the child’s established emotional ties, psychological well-being, and stated preference to remain with the stepmother. It warned, however, that this decision should not be seen as weakening the strong parental presumption, which it described as “a strong one, not easily overcome.”

Troxel v. Granville, 530 U.S. 57 (2000)

Facts and Lower Court Rulings:

Tommie Granville, the mother of two young daughters, restricted the visitation of the children’s paternal grandparents (the Troxels) after the children's father passed away. Although Granville allowed limited visitation, she opposed the extended schedule the grandparents sought. Relying on Washington’s nonparental visitation statute, which allowed “any person” to petition for visitation “at any time” based solely on the “best interests of the child,” the Superior Court granted the Troxels more visitation than Granville had agreed to. The Washington Court of Appeals reversed, and the Washington Supreme Court affirmed, holding the statute unconstitutional because it infringed on the fundamental rights of fit parents by not requiring any showing of harm to the child.

U.S. Supreme Court Ruling and Rationale:

The Supreme Court affirmed, holding that Washington’s statute, as applied, violated the Due Process Clause of the Fourteenth Amendment. Writing for the plurality, Justice O’Connor emphasized that a fit parent’s decision regarding visitation is entitled to “special weight” and that courts cannot override that decision based solely on a judge’s belief about a child’s best interests. The Court stressed that parents have a fundamental liberty interest in the care, custody, and control of their children—an interest long recognized in cases like *Meyer v. Nebraska*, *Pierce v. Society of Sisters*, and *Parham v. J.R.*.

The Court took issue with the statute's breathtaking scope, which allowed any person to petition for visitation at any time, with no requirement to show harm, changed circumstances, or a pre-existing relationship. Critically, the trial court gave no deference to Granville's judgment as a fit parent and instead applied the opposite presumption—placing the burden on her to disprove that extended visitation was in the children's best interests. This inverted the constitutional presumption and imposed an impermissible burden on parental rights.

The Court did not rule that all nonparent visitation statutes are per se unconstitutional, nor did it require a showing of harm in every case. Instead, it found that the combination of the statute's broad language and its application without deference to the fit parent's wishes rendered the order unconstitutional in this case. Justice Thomas concurred, advocating for strict scrutiny review and concluding that the state lacked even a legitimate interest in overriding a fit parent's decision.

Delbridge v. Snipes, 2019 Va. App. LEXIS 40

Facts and Trial Court Ruling:

Sandra Perry, the child's paternal great-aunt, and Sterling Delbridge, the child's father, sought custody of K.S., arguing that the mother, Erin Snipes, was unfit due to her past drug use and neglect. Although Snipes had a troubled past, including drug use during pregnancy and erratic behavior after K.S.'s birth, she later demonstrated significant improvement. The circuit court found that Snipes had addressed her substance abuse, maintained a stable household, and was capable of caring for the child. The court awarded custody to Snipes, granting Perry visitation and Delbridge supervised visitation.

Appellate Ruling:

The Court of Appeals affirmed the circuit court's ruling, emphasizing that while nonparents may seek custody, the law presumes that the best interests of the child are served by placing custody with a fit parent. The court found that the appellants failed to rebut the parental presumption with clear and convincing evidence of unfitness or extraordinary circumstances. The trial court's finding that Snipes had not actually harmed the child and was currently capable of parenting was supported by the evidence.

Handy v. Eaton, 2023 Va. Cir. LEXIS 25

Facts and Trial Court Ruling:

Following the death of S.L.'s mother, the maternal aunt, Erica Eaton, took physical custody

of the four-year-old child. The biological father, Robert Handy, and paternal grandmother, Ramona Handy, petitioned for custody. The aunt alleged the father was unfit, had abandoned S.L., and that extraordinary circumstances justified an award of custody to a nonparent. She also sought court-ordered visitation if custody was denied. After a full trial, the circuit court ruled that the aunt failed to meet her burden and awarded joint legal and physical custody to the father and grandmother. The aunt's petitions for custody and visitation were denied.

Application of Bailes v. Sours:

The court relied heavily on *Bailes v. Sours*, 231 Va. 96 (1986), to articulate the governing standard for awarding custody to a nonparent. Under *Bailes*, a nonparent may overcome the presumption favoring parental custody only by **clear and convincing evidence** of: (1) parental unfitness, (2) a prior order of divestiture, (3) voluntary relinquishment, (4) abandonment, or (5) **special facts and circumstances constituting an extraordinary reason to remove the child from the parent**. The court emphasized that this is a strong presumption, "not easily overcome," and clarified that a mere showing of best interests is insufficient. Applying this standard, the court found the aunt had not shown actual harm or any of the five grounds required by *Bailes*, and thus could not displace the father's fundamental right to custody.

Leidel v. Leidel, 2025 Va. App. LEXIS 57

Facts and Trial Court Ruling:

Jason Leidel appealed a J&DR court order granting joint legal custody to him and his children's mother, with the mother holding tie-breaking authority on major decisions and the father limited to therapeutic visitation. Before the scheduled hearing in circuit court, Leidel was detained out of state on unrelated federal charges. Despite written requests for a continuance due to his confinement and inability to appear, the circuit court proceeded in his absence and dismissed the appeal for failure to prosecute. The result left the restrictive J&DR custody and visitation arrangement in place.

Appellate Ruling and Application of Troxel:

The Court of Appeals reversed and remanded, holding that the circuit court erred in denying a continuance under circumstances that effectively barred Leidel, a pro se litigant, from presenting his case. The appellate court cited *Troxel v. Granville*, 530 U.S. 57 (2000), to reaffirm that parents have a fundamental liberty interest in the care, custody, and control of their children. That right includes not just retaining custody, but also the procedural right to a fair opportunity to be heard in proceedings that may impact that relationship. By

proceeding without Leidel present and without sufficient justification, the circuit court violated his due process rights, contrary to the constitutional protections affirmed in *Troxel*.

L.F. v. Breit, 285 Va. 163 (2013)

Facts and Trial Court Ruling:

William Breit and Beverley Mason, an unmarried couple, conceived a child, L.F., through in vitro fertilization using Mason's egg and Breit's sperm. The couple lived together throughout the pregnancy, and the day after L.F.'s birth, they executed a written Acknowledgment of Paternity recognizing Breit as the child's legal and biological father. For over a year, Breit provided financial support, maintained L.F. on his health insurance, and had regular visitation until Mason unilaterally cut off all contact. When Breit petitioned for custody and visitation, Mason argued that he was a mere sperm donor under Virginia's assisted conception statute (§ 20-158(A)(3)), which barred him from asserting parental rights since the two were unmarried. The trial court sustained her plea in bar and dismissed Breit's petition.

Appellate Ruling and Parental Status Determination:

The Supreme Court of Virginia held that Breit was a legal parent, not a nonparent. The Court harmonized the assisted conception statute with the parentage statute (§ 20-49.1(B)(2)), which allows unmarried biological parents to voluntarily establish paternity by written acknowledgment under oath. Because Breit and Mason executed such an acknowledgment, he was not considered a "donor" under the meaning of § 20-158(A)(3), and thus was not barred from asserting custody and visitation rights. This classification was critical: because Breit was legally a parent, the parental presumption applied in his favor, and he did not need to overcome the high burden imposed on nonparents (as set out in *Bailes v. Sours*). The ruling ensured that legal parentage could not be defeated merely by the method of conception or marital status, provided that parentage was acknowledged according to statute.

Schneider v. LeVesque, 2016 Va. Cir. LEXIS 203

Facts and Trial Court Ruling:

After the child's mother died of a drug overdose, both the biological father and maternal grandmother sought custody of G.S. Years earlier, in response to a Child Protective Services investigation in Arizona, both parents had **voluntarily consented** to a court order appointing the grandmother as **permanent guardian**, with permission to relocate the child

to Virginia. Though custody later returned informally to the parents, no court formally dissolved the Arizona guardianship. Upon the mother's death, the Virginia juvenile court awarded joint legal custody to the father and grandmother, with primary physical custody to the grandmother. The father appealed, and the circuit court conducted a de novo trial.

Application of *Bailes v. Sours* and Ruling:

The circuit court applied *Bailes v. Sours*, recognizing the strong presumption in favor of a natural parent, but found that the grandmother had rebutted the presumption by **clear and convincing evidence** on two grounds:

1. **Voluntary Relinquishment** – The 2006 Arizona guardianship order, signed by both parents, constituted a voluntary and formal relinquishment of custody to the grandmother.
2. **Special Facts and Circumstances** – The grandmother had been the child's stable caregiver during times of parental instability, including substance abuse and absence. Given her deep, long-standing relationship with the child and the father's limited involvement, the court found extraordinary reasons justifying nonparent custody.

With the presumption rebutted, the court proceeded to a best interests analysis and awarded primary physical custody to the grandmother.

Williams v. Williams, 24 Va. App. 778 (1997)

Facts and Trial Court Ruling:

Paternal grandparents sought visitation over the objections of both biological parents, arguing it was in the child's best interest. The circuit court found the grandparents were fit and loving, and awarded visitation under Code § 20-124.2(B) without finding that harm would occur if visitation were denied.

Appellate Ruling and Visitation Standard:

The Court of Appeals reversed, holding that parental autonomy is a fundamental right under the Due Process Clause of the Fourteenth Amendment. Applying strict scrutiny, the court held that a compelling state interest—such as a showing that the child would suffer harm or detriment without visitation—was required before ordering visitation over the objections of fit parents. The best interests standard alone was insufficient to overcome this constitutional protection.

Yokshas v. Bristol DSS, 2017 Va. App. LEXIS 286

Facts and Trial Court Ruling:

Yokshas and Greaser, former foster parents of a medically fragile child, filed petitions for custody, adoption, and injunctive relief after the child was removed from their care. The circuit court dismissed all petitions, holding that they lacked standing as they were no longer “persons with a legitimate interest” once their foster care agreement ended and the child was placed with a new foster family.

Appellate Ruling:

The Court of Appeals reversed, holding that the appellants did qualify as persons with a legitimate interest under Code § 20-124.1 and should have been allowed to proceed on their custody petition. The court emphasized that the definition of a “person with a legitimate interest” is to be construed broadly, especially in cases involving complex foster care histories. The decision reinforced the idea that standing is a separate threshold question from whether the nonparent ultimately prevails on the merits.

Williams v. Panter, 83 Va. App. 520 (2025)

Facts and Trial Court Ruling:

After the suicide of their son, the paternal grandparents of three children sought visitation. Initially permitted by the children’s mother, contact was later restricted due to concerns about inappropriate messaging and undermining her parental authority. The grandparents filed for visitation under Code § 20-124.2(B2), a statute that permitted grandparents to prove a deceased parent’s prior consent and then have visitation determined under a best interests standard. The circuit court ruled that the statute was unconstitutional as applied because it allowed intrusion on the surviving parent’s rights without requiring proof of actual harm.

Appellate Ruling and Constitutional Analysis:

The Court of Appeals affirmed, holding that the statute violated the mother’s fundamental rights under the Fourteenth Amendment and *Troxel v. Granville*. It emphasized that a surviving, fit parent retains exclusive authority over visitation decisions unless a nonparent can show that denial of visitation would cause actual harm to the child. The court reiterated that parental rights do not survive posthumously and cannot be invoked by others to override the surviving parent’s constitutional protections. The court’s holding did

not address what the outcome would be if the surviving parent was incapacitated.

Yopp v. Hodges, 43 Va. App. 427 (2004)

In Yopp v. Hodges, the Court of Appeals upheld an award of visitation to maternal grandparents over the mother's objection. The mother argued that the trial court erred by not applying the heightened standard from Williams v. Williams, which requires a showing of actual harm before granting visitation over both parents' objections. The Court distinguished Williams, holding that only one parent objected while the other (the father) supported visitation. Under Dotson v. Hylton, when one fit parent supports visitation, courts may apply the "best interests of the child" standard rather than the more stringent "actual harm" test.

Key takeaway: In visitation cases where one parent objects but the other consents, Virginia courts may grant visitation to nonparents based solely on the child's best interests without requiring proof of harm.

Moore v. Joe, 76 Va. App. 509 (2023)

In Moore v. Joe, the Court of Appeals affirmed the dismissal of custody and visitation petitions brought by former foster parents against the child's biological mother. The Norfolk Juvenile and Domestic Relations District Court had previously awarded custody of the child to the Norfolk Department of Human Services after the mother abandoned the child at a shelter. The child was placed with the Moores. Following extensive reunification efforts, the J&DR court found the mother fit and returned custody to her in April 2021. The J&DR court simultaneously dismissed the Moores' custody and visitation petitions.

On appeal, the circuit court found that the mother had since demonstrated fitness by maintaining stable housing, employment, and participating in reunification services. The Moores failed to show actual, current harm to the child that would result from denying them custody or visitation. The trial court properly excluded speculative or stale evidence, including a deposition from a psychologist who had not evaluated the mother in nearly two years. The Court emphasized that nonparents must prove actual harm to overcome a fit parent's constitutional rights under Bailes v. Sours and Williams v. Williams.

Key takeaway: Former foster parents cannot override a fit parent's custody rights without clear and convincing evidence of actual harm. Mere concerns about parenting quality or comparisons to a nonparent's resources are not enough.

Application of *Bailes v. Sours* and *Troxel v. Granville* in Virginia Custody and Visitation Cases

Custody and visitation disputes involving nonparents require courts to balance the best interests of the child against the fundamental constitutional rights of parents. Two cases have become pillars in this area of law: *Bailes v. Sours*, 231 Va. 96 (1986), and *Troxel v. Granville*, 530 U.S. 57 (2000). Virginia courts have relied heavily on these decisions to shape the legal standards applied when nonparents seek custody or visitation over the objections of a parent.

I. *Bailes v. Sours*: Establishing the Rebuttable Parental Presumption

In *Bailes v. Sours*, the Virginia Supreme Court held that a fit parent is presumed to act in the best interests of the child and is entitled to custody unless that presumption is rebutted by clear and convincing evidence. The Court articulated five grounds on which a nonparent can overcome this presumption: (1) the parent is unfit, (2) there has been a previous order of divestiture, (3) there has been a voluntary relinquishment, (4) there has been abandonment, or (5) special facts and circumstances constitute an extraordinary reason for removing the child from parental custody.

Virginia courts have applied this framework consistently. For instance, in *Handy v. Eaton*, 2023 Va. Cir. LEXIS 25, the circuit court denied a maternal aunt's petition for custody following the mother's death. Despite the aunt's longstanding relationship with the child, the court found no evidence of unfitness or extraordinary circumstances and therefore upheld the father's rights under the *Bailes* standard.

Similarly, in *Schneider v. LeVesque*, 2016 Va. Cir. LEXIS 203, the court awarded custody to a maternal grandmother who had previously served as the child's legal guardian. The court found that both the "voluntary relinquishment" and "special facts and circumstances" prongs of the *Bailes* test were satisfied, thereby rebutting the parental presumption.

In *Moore v. Joe*, 76 Va. App. 509 (2023), former foster parents failed to meet the *Bailes* standard. The court found no current evidence of harm to the child and concluded that the biological mother's fitness had not been rebutted (the court likened unfitness prong in *Bailes* to the actual harm standard set out in *Troxel*), reaffirming that the best interests of the child cannot override the constitutional presumption in favor of a fit parent without a proper evidentiary showing.

II. *Troxel v. Granville*: Constitutional Limits on Third-Party Visitation

In *Troxel v. Granville*, the U.S. Supreme Court held that the Due Process Clause of the Fourteenth Amendment protects a parent's fundamental right to make decisions concerning the care, custody, and control of their children. The Court found Washington's

visitation statute unconstitutional as applied because it gave no special weight to the decisions of a fit parent and allowed any third party to petition for visitation based solely on a judge's opinion of the child's best interests.

Virginia courts have followed *Troxel* in holding that the best interests of the child standard alone is insufficient to override a fit parent's objections. In *Williams v. Williams*, 24 Va. App. 778 (1997), decided before *Troxel* but later reaffirmed in its reasoning, the Virginia Court of Appeals applied strict scrutiny and reversed a trial court order granting visitation to grandparents over the objections of both parents. The court held that actual harm must be shown before a court may infringe on a parent's fundamental rights.

Williams v. Panter, 83 Va. App. 520 (2025), is a more recent example. There, the Court of Appeals struck down a visitation order granted to grandparents under a statute that allowed visitation based on a deceased parent's prior consent. Citing *Troxel*, the court found that such statutes violate the surviving parent's constitutional rights unless there is a showing of harm or some compelling state interest.

Leidel v. Leidel, 2025 Va. App. LEXIS 57, further illustrates *Troxel*'s influence. The appellate court reversed a trial court's decision to proceed with a custody appeal in the father's absence due to incarceration. The Court emphasized that denying a fit parent the opportunity to be heard violates due process, aligning with *Troxel*'s recognition that parents' rights include not just custody but meaningful participation in legal proceedings that affect their children.

Conclusion

Virginia courts have consistently applied the framework established in *Bailes v. Sours* and the constitutional protections reinforced by *Troxel v. Granville* to custody and visitation disputes involving nonparents. Together, these cases ensure that the rights of fit parents are given paramount consideration and that third-party claims are subjected to a high evidentiary threshold before parental autonomy is disturbed. This balance reflects Virginia's commitment to both protecting children and upholding constitutional family rights.

Calculating Child Support When the Child Resides with a Nonparent in Virginia

When a child lives with a nonparent—such as a grandparent, aunt, or foster parent—Virginia's child support guidelines still apply, but only the **legal parents** (biological or adoptive) are financially responsible for support. The process for calculating support in such cases is rooted in **Va. Code § 20-108.2**, with definitions drawn from § 63.2-1900.

Step-by-Step Process

1. Identify the Parents and Custodial Arrangement

Determine who the biological or adoptive parents are. Only they will be responsible for paying child support. A nonparent custodian may have physical custody but is not treated as a "parent" for support purposes.

2. Determine Gross Monthly Income of Each Parent

Under § 20-108.2(C), only the gross incomes of the **parents** are included. A nonparent's income is **not** used in the calculation.

3. Refer to the Guideline Schedule

Use the combined monthly gross incomes of the parents and the number of children to find the basic child support obligation in the schedule provided in § 20-108.2(G).

4. Allocate the Obligation Between the Parents

Divide the total support obligation between the parents in proportion to their respective incomes.

5. Add Allowable Additional Expenses

- **Work-Related Daycare Costs (§ 20-108.2(D)):** If the **custodial parent** (which includes nonparents per § 63.2-1900) incurs work-related daycare expenses, those must be included and allocated between the parents.
- **Health Insurance Premiums (§ 20-108.2(E)):** Only added if actually being paid by a **parent or the parent's spouse**. If the nonparent custodian pays the premium, it is **not automatically included** and may only be considered via a deviation.

- **Unreimbursed Medical/Dental Expenses (§ 20-108.2(D)):** These must be allocated **only between the parents in proportion to their gross incomes**. The nonparent has **no obligation to contribute** and is not responsible for a share.

6. Consider Deviation if Appropriate

Under § 20-108.1(B), the court may deviate from the guideline support amount if it would be unjust or inappropriate, including to reimburse a nonparent custodian who has incurred health insurance or medical costs not otherwise covered by the guidelines.

7. Issue the Support Order

Support is paid by the parents to the nonparent custodian, either directly or through the Department of Child Support Enforcement.

Advanced Scenario: Shared Custody with a Nonparent Custodian

In some cases, one parent has the child for more than 90 days per year (thus qualifying for shared custody treatment), while the child resides with a nonparent custodian the rest of the year. In this situation:

- **Run both a sole and a shared custody guideline calculation.**
- In the shared custody calculation, substitute the **nonparent's time and financial care** using the **other parent's income** (since the nonparent does not owe a duty of support).
- **Do not subtract the parents' incomes from each other**, as you would in a traditional two-parent shared custody case.
- The final support obligation should be based on **whichever calculation yields the lower amount**—either the sole custody or the modified shared custody guideline.

This hybrid approach allows the court to capture the actual economic contributions of both parents while acknowledging that the nonparent does not have a support obligation under law.

Summary Table

Expense Type	Included If Paid By	Statutory Language
Health Insurance	Parent or Parent's Spouse	§ 20-108.2(E)
Daycare Costs	Custodial Parent (includes nonparents)	§ 20-108.2(D)
Unreimbursed Medical	Parents Only	§ 20-108.2(D)
Nonparent Custodian's Income	Not Included	Not within "parent" scope

Key Legal Distinctions

- **Parent** = Only biological or adoptive parents; their income is used for support calculation.
- **Custodial Parent** = Broader definition under § 63.2-1900, includes nonparents with physical custody.
- **Nonparents are not obligors** and have **no duty to contribute** financially but may receive support and reimbursement through a deviation based on the parent's income shares.

This structure ensures the child is financially supported by their legal parents, while nonparents who step in to care for the child are not penalized or made involuntarily responsible for expenses outside the statutory framework.

Alternative Means of Support for Children Living with Non-Parents

1. Social Security Administration (SSA)

Dependent/Child Benefits:

- Who qualifies: If the grandparent receives Social Security retirement or disability benefits and:
 - * The child's parents are deceased or disabled OR
 - * The grandparent has legally adopted the child

- * The child has lived with the grandparent and was financially dependent for at least one year before the grandparent became eligible.
- Benefit: Up to 50% of the grandparent's benefit (subject to family maximum).

Supplemental Security Income (SSI):

- Who qualifies: A child with a disability and limited income/resources.
- Note: If the grandparent is not the legal parent, their income is not counted (no deeming).
- Benefit: Monthly cash assistance (varies by state and household).

2. Local Department of Social Services (DSS)

TANF - Child-Only Grant:

- Who qualifies: Child living with a grandparent, without the parent in the home.
- Income considered: Only the child's; grandparent's income is not counted.
- Benefit: Monthly cash payments (~\$146-\$265/month per child in VA).

SNAP (Food Stamps):

- Who qualifies: Based on household income.
- Benefit: Monthly food assistance.

Medicaid or FAMIS:

- Who qualifies: Child with low income.
- Income considered: Household income.

Child Care Subsidy Program:

- Who qualifies: Grandparent must be working or in school.
- Benefit: Subsidized or fully covered child care.

Relative Maintenance Support Payment (VA-specific):

- Who qualifies: Child diverted from foster care.
- Benefit: \$200/month per child.
- Requires: Verification from DSS Family Services Specialist.

Kinship Guardianship Assistance Program (KinGAP):

- Who qualifies: Grandparent has legal custody of child formerly in foster care.
- Benefit: Monthly foster care equivalent; child remains eligible for Medicaid.
- Not compatible with TANF.

3. How to Apply

Program	Where to Apply	Website / Phone
Social Security Benefits	SSA Office	ssa.gov / 1-800-772-1213
SSI (Disability)	SSA Office	ssa.gov/disability
TANF, SNAP, Medicaid	Local DSS / CommonHelp	commonhelp.virginia.gov
Child Care Subsidy	Local DSS	commonhelp.virginia.gov
KinGAP / Relative Support	Family Services at DSS	Local DSS caseworker

4. Tax Assistance for Grandparents

1. Child Tax Credit (CTC)

- Up to \$2,000 per child under 17. Income limits apply (\$200,000 single / \$400,000 married filing jointly).

2. Earned Income Tax Credit (EITC)

- For working grandparents with low-to-moderate income. Amount depends on income and number of children.

3. Child and Dependent Care Credit

- For grandparents who pay for childcare to work or look for work. Up to 35% of eligible expenses.

4. Education Credits (AOTC & LLC)

- If paying for college, may qualify for up to \$2,500 (AOTC) or \$2,000 (LLC) in credits.

5. Head of Household Status

- If you pay more than half the cost of the home and the child lives with you, this status may reduce taxes owed.