

**Department of Health and Human Services**

**OFFICE OF  
INSPECTOR GENERAL**

**Client Cooperation With  
Child Support Enforcement**

**The Role of Public Assistance Agencies**



**JUNE GIBBS BROWN  
Inspector General**

**MARCH 2000  
OEI-06-98-00042**

## **OFFICE OF INSPECTOR GENERAL**

The mission of the Office of Inspector General (OIG), as mandated by Public Law 95-452, is to protect the integrity of the Department of Health and Human Services programs as well as the health and welfare of beneficiaries served by them. This statutory mission is carried out through a nationwide program of audits, investigations, inspections, sanctions, and fraud alerts. The Inspector General informs the Secretary of program and management problems and recommends legislative, regulatory, and operational approaches to correct them.

### **Office of Evaluation and Inspections**

The Office of Evaluation and Inspections (OEI) is one of several components of the Office of Inspector General. It conducts short-term management and program evaluations (called inspections) that focus on issues of concern to the Department, the Congress, and the public. The inspection reports provide findings and recommendations on the efficiency, vulnerability, and effectiveness of departmental programs.

OEI's Region VI prepared this report under the direction of Chester B. Slaughter, Regional Inspector General and Judith V. Tyler, Deputy Regional Inspector General.

Principal OEI staff included:

#### **DALLAS**

Blaine Collins  
Ruth Ann Dorrill  
Marnette Robertson  
Clark Thomas, Ph.D.  
Nancy Watts  
Lisa White

#### **HEADQUARTERS**

Alan Levine, *Program Specialist*  
Joan Richardson, *Program Specialist*  
Linda Hall

#### **FIELD OFFICES**

Lucille Cop  
Vincent Greiber  
Ianna Kachoris  
Thomas Purvis  
Graham Rawsthorn

To obtain copies of this report, please call the Dallas Regional Office at 214-767-3310.  
Reports are also available on the World Wide Web at our home page address:

<http://www.dhhs.gov/progorg/oei>

# EXECUTIVE SUMMARY

## PURPOSE

To describe the role of public assistance agencies and interagency collaboration in gaining cooperation with child support enforcement from Temporary Assistance for Needy Families (TANF) clients.

## BACKGROUND

Federal law requires TANF clients to cooperate with State child support enforcement by providing information about noncustodial parents and appearing for appointments as needed. Public assistance agencies are often responsible for informing clients of these requirements, eliciting information from clients about noncustodial parents, and transferring this information to the child support agency. If notified by the State child support agency that a client is not cooperating, the public assistance agency must reduce the family's cash assistance by at least 25 percent and, at State discretion, may deny the family all cash assistance. Additionally, States may choose to have their public assistance agency administer "good cause" and other exceptions that may exempt clients from cooperating. This report examines the role of public assistance agencies and interagency collaboration in gaining TANF client cooperation with child support enforcement in six focus States which we chose in order to examine a variety of implementation strategies and experiences regarding client cooperation. We surveyed staff and reviewed documents from 99 local child support and 103 local public assistance offices, and interviewed approximately 180 local office managers and caseworkers.

## FINDINGS

### AGENCY RESPONSIBILITIES

#### **Public Assistance Staff Typically Interview New Applicants and Clients to Gather Basic Information about Noncustodial Parents**

Public assistance staff spend limited interview time gathering information about noncustodial parents, with two-thirds of public assistance staff reporting spending 15 minutes or less on this portion of TANF client interviews. Clients are asked to provide basic information such as an absent parent's date of birth, current address, current employer, and Social Security number.

#### **Most Local Public Assistance Offices Quickly Transfer Information to Child Support Agencies, Yet Many Child Support Staff Are Concerned About the Accuracy and Completeness of Information**

While child support agencies generally rate the timeliness of electronic information transfer from public assistance offices as good, some complain they do not receive, or do not have access to, all

the useful information collected by public assistance staff. Public assistance staff often gather enough critical information, such as the noncustodial parent's Social Security number, for child support to pursue enforcement. However, many child support respondents rate the usefulness, accuracy, and completeness of information gathered by public assistance as only fair or poor.

### **Penalties for Noncooperation in Focus States Vary, But Many Child Support Respondents Are Concerned That Penalties are Not Properly Imposed**

In focus States, penalties for noncooperation range from the Federally-mandated 25 percent reduction in the family's cash grant to elimination of all cash assistance. All public assistance respondents report notifying TANF clients about the nature and timing of impending penalties, as well as their right to appeal an adverse action. Additionally, some local public assistance offices attempt to reconcile with clients, and gain cooperation prior to imposing penalties. Many child support respondents believe public assistance staff do not always follow through on imposing penalties on noncooperative TANF clients.

## **AGENCY COLLABORATION**

### **While Most Public Assistance and Child Support Staff Rate Their Relationship as Effective, Many Raise Concerns About Close Collaboration**

Most child support and public assistance staff believe their interagency relationship is effective, yet many perceive that their overall agency goals are not aligned. Staff generally characterize the public assistance agency as a service agency, whereas most view child support enforcement as an arm of law enforcement. Some believe these cultural differences make collaboration more difficult, while others see them as an advantage for gaining client cooperation.

### **Communication Between Child Support and Public Assistance Workers is Limited and Sometimes Problematic, Especially Telephone Contact**

Staff report little communication between workers of each agency and significant problems in reaching their counterpart by telephone. Workers suggest that these communication barriers complicate casework and potentially hinder client cooperation.

### **Staff in Both Agencies Receive Training About Gaining TANF Client Cooperation, But Most Training is Conducted Separately**

Most public assistance and child support respondents report formally training workers about State cooperation requirements and collecting noncustodial parent information from clients. Cross-training, however, is limited, with only one-third or less of all training involving representatives from the other agency. Respondents involved in cross-training believe it improves staff understanding of the needs of the other agency.

## **Some Local Offices Use Co-location or Out-stationing of Child Support Staff in Public Assistance Offices to Improve Agency Collaboration**

A number of local office respondents report having child support and public assistance offices at the same site (co-location). Others describe having child support staff work at public assistance offices either full time or on a scheduled basis (out-stationing). Many credit these strategies with improving communication between agencies.

## **RECOMMENDATIONS**

Successful operation of the child support enforcement program requires effective, cooperative action by both the Office of Child Support Enforcement and the Office of Family Assistance. Therefore, we recommend that the Assistant Secretary for the Administration for Children and Families (ACF) encourage States to complete the following.

### **Focus Public Assistance Information Gathering on Specific Facts about Noncustodial Parents That Are Most Useful for Enforcement**

### **Explore Ways to Enhance Public Assistance Staff Access to Information Verification Tools, Potentially Easing the Information Collection Process**

### **Continue to Improve Systems Which Allow the Exchange of Information Between Public Assistance and Child Support Enforcement Agencies**

### **Work with Local Public Assistance Offices to Insure That Penalties for Noncooperation with Child Support Are Properly Imposed**

### **Strengthen Interaction, Cross-Training, and Communication Between Their Public Assistance and Child Support Enforcement Agencies**

## **COMPANION REPORTS**

---

This is one of four OIG reports on how States gain TANF client cooperation with child support enforcement. One companion report, *Client Cooperation with Child Support Enforcement: Policies and Practices* (OEI-06-98-00040), provides an overview of cooperation policies and how they are implemented by States. Another report, *Client Cooperation with Child Support Enforcement: Challenges and Strategies to Improvement* (OEI-06-98-00041), examines why some clients do not cooperate and how States attempt to gain their cooperation. The remaining report, *Client Cooperation with Child Support Enforcement: Use of Good Cause Exceptions* (OEI-06-98-00043), describes how clients may be exempted from cooperation requirements under certain circumstances, especially when enforcement may put the child at risk of violence.

---

# TABLE OF CONTENTS

	<b>PAGE</b>
<b>EXECUTIVE SUMMARY</b>	i
<b>INTRODUCTION</b>	1
<b>FINDINGS</b>	
<b>Agency Responsibilities</b>	
<b>Information Collection</b>	4
<b>Transfer of Information</b>	5
<b>Imposing Penalties for Noncooperation</b>	7
<b>Interagency Collaboration</b>	9
<b>RECOMMENDATIONS</b>	13
<b>ENDNOTES</b>	15

# INTRODUCTION

## PURPOSE

To describe the role of public assistance agencies and interagency collaboration in gaining cooperation with child support enforcement from Temporary Assistance for Needy Families (TANF) clients.

## BACKGROUND

Federal law has long required public assistance clients to cooperate with State child support enforcement authorities in establishing and enforcing child support and medical support orders, and in establishing paternity. As part of a broad effort to reform the nation's welfare system, Congress made significant changes to Federal policy regarding client child support cooperation requirements in the Personal Responsibility and Work Opportunity Act of 1996. Currently, unless exempted from cooperation requirements through a good cause or other exception,<sup>1</sup> TANF clients must name and provide information about the noncustodial parent of their children, and otherwise cooperate as determined by the State.<sup>2</sup> Formerly, State public assistance agencies determined whether clients were cooperating with their State's child support agency; however, welfare reform made State child support agencies responsible for determining if TANF clients are cooperating in "good faith" and notifying the public assistance agency of each client's cooperation status. Before welfare reform, State public assistance agencies solely determined how to deal with clients who failed to cooperate. Now, if the child support agency determines a client has not cooperated, the TANF agency is required to reduce the family's cash assistance by at least 25 percent and, at State discretion, may deny the family all cash assistance. If a State public assistance agency does not enforce the penalties requested by the child support agency, Federal law allows for the State to be penalized up to 5 percent of their TANF funds.<sup>3</sup> All these changes were made in an attempt to improve client cooperation with child support enforcement. While families who receive Medicaid coverage, food stamps, or foster care services are also required to cooperate with child support enforcement efforts, this report focuses on cooperation issues involving clients of the TANF program.<sup>4</sup>

State public assistance agencies play a major role in gaining TANF client cooperation, a critical first step of child support enforcement. Public assistance staff are often responsible for explaining State cooperation requirements to clients, gathering initial information about noncustodial parents, transferring this information to the child support agency, and imposing penalties on clients deemed noncooperative by the child support agency. Child support staff often use the information gathered by public assistance staff to locate a noncustodial parent or putative father, establish paternity, create a child support order, and/or enforce a prior obligation. Welfare reform increased the importance of collaboration between child support enforcement and public assistance agencies. With a

greater focus on moving families toward work and self-sufficiency, child support is seen as a potential source of income for many needy families. Therefore, public assistance agency support of child support enforcement efforts has become more important than in the past. This report describes the role of public assistance agencies in gaining TANF client cooperation with child support enforcement and examines interagency collaboration in six States. We also identify potential barriers to effective interaction and offer recommendations where appropriate.

## **SCOPE AND METHODOLOGY**

We used several sources of information to examine TANF client cooperation with child support enforcement. The primary source of information comes from self-administered written surveys which we mailed to local child support and public assistance offices. Managers and administrators from 99 local child support offices and 103 public assistance offices in six focus States - California, Georgia, Illinois, New Jersey, Texas and Virginia - returned these mail surveys regarding cooperation policies, practices, and improvement strategies. The quantitative data (percentage of responses) presented in this report come from responses to the questions in these surveys. We also gathered and reviewed agency documents from these same local offices, including client cooperation policy statements, standardized forms, examples of correspondence with clients and other agencies, outreach materials, and other related documents.

We also made site visits to a subset of local offices, visiting offices in one or two cities and their surrounding areas in each of the six focus States. During these visits, we conducted interviews with approximately 180 local public assistance and child support managers and caseworkers. At almost all offices, we interviewed one or more managers, then separately interviewed two or more caseworkers. Resource constraints prevented us from directly interviewing clients. Finally, we conducted telephone interviews of administrators from each State's child support enforcement and public assistance agency to confirm information regarding State policies.

We purposively selected the six focus States to include a variety of implementation strategies and experiences regarding client cooperation. To achieve this variety, we considered many criteria including type of penalties for noncooperation, number of good cause claims, number of good cause exceptions granted, outstanding program characteristics (innovations, privatization, etc.), status as State-administered or county-administered, and geographic region. We also purposively selected local child support and public assistance offices within these States to provide a mix of urban, suburban, mid-size, and rural locations. The selection of focus States does not purport to be representative of the nation, nor do local offices represent all offices within individual focus States. The selections do, however, allow for examination of client cooperation processes under conditions found throughout the country.

This report relies on the perceptions of local office survey respondents and interviewees. These respondents provided detailed information about how cooperation policies are



implemented, as well as the effect of cooperation requirements on office operations, staff, and clients. We did not attempt to independently verify the information provided by staff. However, the information included in the report does relate the experience of front line staff who deliver services to clients on a daily basis, and who demonstrate considerable concern for the effectiveness of their programs.

This study was conducted in accordance with the Quality Standards for Inspections issued by the President's Council on Integrity and Efficiency.

## COMPANION REPORTS

---

This is one of four OIG reports on how States gain TANF client cooperation with child support enforcement. One companion report, *Client Cooperation with Child Support Enforcement: Policies and Practices* (OEI-06-98-00040), provides an overview of cooperation policies and how they are implemented by States. Another report, *Client Cooperation with Child Support Enforcement: Challenges and Strategies to Improvement* (OEI-06-98-00041), examines why some clients do not cooperate and how States attempt to gain their cooperation. The remaining report, *Client Cooperation with Child Support Enforcement: Use of Good Cause Exceptions* (OEI-06-98-00043), describes how clients may be exempted from cooperation requirements under certain circumstances, especially when enforcement may put the child at risk of violence.

---

# FINDINGS

## AGENCY RESPONSIBILITIES

In addition to explaining the requirements and benefits of cooperating with child support enforcement, public assistance agencies have four specific responsibilities that affect TANF client cooperation: collecting information about noncustodial parents from applicants and clients; transferring information to the child support agency; imposing penalties when the child support agency determines a client is not cooperating; and, at State discretion, administering good cause and other exceptions that may exempt clients from cooperating with child support enforcement. This section examines the first three of these responsibilities, while good cause exceptions are discussed in a companion report.<sup>5</sup>

## INFORMATION COLLECTION

Typically, the first opportunity TANF clients have to cooperate with child support enforcement occurs when they apply for assistance. During application interviews, clients are asked to provide information about noncustodial parents or putative fathers. This interview is usually conducted by public assistance staff, although child support staff may be out-stationed or co-located in some local public assistance offices and conduct the child support portion of the interview.<sup>6</sup> No matter who conducts this portion of the application interview, the information is generally entered into some form of automated system and transferred to the child support agency.

### **Public Assistance Staff Spend Limited Interview Time Gathering Noncustodial Parent Information, Often Focusing on Basic Information Only**

For public assistance staff conducting new application or re-determination interviews, gathering information about noncustodial parents is a small part of a typically lengthy process. Sixty percent of public assistance respondents estimate that initial client interviews with caseworkers last over half an hour, and another 30 percent indicate these interviews are between one and two hours in length. During this time, staff must determine deprivation, complete numerous documents, and explain program rules for cash assistance and, sometimes, medical coverage and food stamps. Caseworkers explain that with all of these demands and limited staff time, the child support portion of the interview becomes just one of a series of tasks which they necessarily move through as rapidly as possible.

About two-thirds of public assistance staff report the child support portion of TANF client interviews lasts 15 minutes or less. In addition to gathering information during this time, interviewers must also explain State cooperation requirements, policies regarding claiming good cause or other exceptions, and policies requiring that clients assign to the State any child support paid by the noncustodial parent. Clients are typically asked to sign a form indicating that they understand all of these policies, agree to cooperate with child support

enforcement, and do not wish to claim an exception. The result of all of these demands is that public assistance staff report spending very little time on actually gathering information needed for child support enforcement.

The noncustodial parent portion of the interview often involves obtaining very basic answers to specific questions appearing on a printed form or a computer screen and then moving to the next topic. Typically, clients are asked to provide information such as a noncustodial parent's date of birth, Social Security number, current address, and current employer. Staff report there is often little time to ask probing questions beyond the minimum required to fill in the intake form and workers often feel pressure to move on to the next interview. As one worker explained, *"We would sometimes like to be able to spend more time talking about the absent parent and getting better information, but you just have to clear the screen and move on sometimes. There's not time for a lot of finesse in getting more information."*

## **TRANSFER OF INFORMATION**

Public assistance staff we surveyed report their offices transfer case information to local child support offices by several means. Ninety-six percent say they provide access to electronic databases and 9 percent say they use electronic mail to send information. Additionally, 74 percent send paper forms and records. Most child support workers (91 percent) agree that they have electronic access to the data collected and maintained by the public assistance agency.

### **Although Timeliness of Transferring Basic Information to the Child Support Agency is Rated as Good, Limited Access to Complete Data Hinders Information Sharing**

Seventy percent of child support respondents rate the timeliness of information transfer as good or excellent, with the remaining 30 percent ranking timeliness as only fair or poor. Many administrators and staff in both agencies attribute this mostly positive rating to technology that allows immediate electronic transfer of case information, daily electronic batch transfers, or weekly or monthly data tape matches between agencies.

However, while many offices receive and transfer information in electronic form, some workers suggest that electronic systems, as they currently exist, pose a challenge to making the most useful information collected by public assistance staff available to child support staff. Apparently, public assistance workers enter potentially useful information into database fields that child support staff are not allowed to access in some systems. Additionally, few State or local computer systems allow workers from one agency to search for data within the other's files. As a result, a child support worker might be able to see a portion of a client's public assistance interview that contains answers to questions directly associated with child support, but be unable to access additional information that might be useful in locating an absent parent, or in establishing or enforcing a child support order. Many child support staff report they could be more efficient with greater access to public assistance databases. As one child support worker argues, *"If we could get on-line*

*with the full database, we wouldn't have to get all this again from the mom. They have the information, we just can't get to it in their system. I'd like to read their comments. We are dealing with people and we would like to have a sense of who we are dealing with ... and what their circumstances are."*

Virtually all local and State administrators report ongoing efforts to improve electronic interface capabilities between agencies, and many are excited about the potential benefits. One child support administrator, whose office is piloting a system intended to directly link public assistance and child support data says, *"The system handles a tremendous amount of information .... Whatever [public assistance] puts into their system, it will carry over into our system. [With this] one-step interview, the error rate is lower and lag [time between] when you enter information and when it is available for other users is greatly reduced. We are very excited."*

### **Information Gathered by Public Assistance Staff is Often Sufficient for Child Support Enforcement**

Public assistance staff often gather enough information from TANF clients for child support workers to pursue paternity establishment, create a child support order, or enforce support. One public assistance worker describes the information some clients provide, *"Some cooperate a ton. They want the benefits for their children. Also, they understand that the child needs support. They give Social Security number and workplace."* When critical information, especially a Social Security number or place of current employment, is provided to public assistance workers, child support staff indicate they may never need to see a client to collect additional information. A child support worker explains, *"We find that typically we do not have to have an interview. Public assistance may collect enough information about the absent parent and get all the necessary forms signed, so that we do not need to see the client."*

### **However, Many Child Support Staff Rate the Overall Usefulness, Accuracy and Completeness of Information Collected by Public Assistance as Only Fair or Poor**

Although the information public assistance staff collect is often sufficient to pursue support, it does not always contain everything that child support workers would like to have to create and enforce a support order. While child support staff usually use the information provided from public assistance interviews, some report they often must spend considerable time checking for accuracy and acquiring additional information through follow-up interviews with the client, or from databases and other investigation. Forty-five percent of child support respondents rate the usefulness of information they receive as good and eight percent report the information they receive is excellent, but the remaining 47 percent of child support respondents rate the usefulness of information as only fair or poor. Additionally, 70 percent of child support respondents rate the accuracy and completeness of this information as only fair or poor.

Staff identify several potential explanations for why the information child support offices receive from the public assistance agency may be less than optimal for their purposes.

First, as noted above, public assistance staff may not be able to devote enough interview time to gather all the information clients have about noncustodial parents. Second, because public assistance staff typically do not use noncustodial parent information for their own purposes, they may not understand which information is most useful to child support workers. As a child support caseworker explains, *“I don’t believe [public assistance] workers fully understand our child support [needs] and so cannot obtain the kind of noncustodial information we require.”* Third, public assistance staff may have little incentive to be concerned about gathering complete and accurate information. We found that few local public assistance administrators consider the child support interview as a “performance indicator” for front line workers. As one child support administrator expresses, *“There are no requirements or incentives for public assistance staff to provide child support with information. There is no monitoring.”* The result of this lack of incentive is that some public assistance workers may feel it is not their job to obtain information about noncustodial parents and may bypass questions on their automated intake forms. As one public assistance worker explains, *“A lot of times workers are just going into those fields that you have to clear and putting ‘unknown’ and that just clears the field ... and they go on.”* Fourth, many public assistance offices in focus States do not have access to electronic tools, such as State motor vehicle or employment databases, to immediately verify the information that clients provide. On the other hand, child support staff typically *do* have access to these tools and believe that clients are more likely to provide accurate information when they understand that workers can immediately verify what they are told. Finally, in a companion report, we detail that some TANF clients have personal and financial disincentives to providing complete and accurate information about noncustodial parents, or to otherwise cooperating with child support enforcement.<sup>7</sup>

## **IMPOSING PENALTIES FOR NONCOOPERATION**

### **Public Assistance Agencies Are Responsible for Imposing Penalties on TANF Clients for Noncooperation and Must Notify Clients of Impending Adverse Actions and Their Right to Appeal**

Procedurally, when child support staff determine that a TANF client is not cooperating, the caseworker notifies the public assistance agency by mail, telephone, FAX, e-mail, or by placing a code in the electronic case file of a shared database. It is then the responsibility of the local public assistance office to impose the appropriate penalties. Penalties for noncooperation in focus States range from the Federally-mandated 25 percent reduction in the family’s cash assistance to a full-family sanction, often resulting in closure of the TANF case. Respondents from every local public assistance office we surveyed report that they notify clients by mail, phone, or in person regarding what penalties will be imposed, when they will take effect, and the client’s right to appeal the adverse action. This notice often serves as the client’s last opportunity to avoid penalties for noncooperation.

One State has formalized this notification process such that public assistance staff schedule a noncooperative client for a “reconciliation meeting.” During this meeting, the

client is informed of the impending penalties and asked to explain why they failed to cooperate originally. If public assistance staff determine that the client had a valid reason for missing a meeting or otherwise failing to cooperate, the client is asked to indicate they will cooperate in the future by signing a “reconciliation agreement”. Clients must then appear for a re-scheduled activity or provide requested information to avoid penalties. While the reconciliation meeting effectively insures that clients have ample opportunity to avoid penalties, some child support staff criticize the process as redundant, because clients must agree to cooperate with child support when they initially apply for benefits.<sup>8</sup>

### **The Majority of Child Support Workers Believe Public Assistance Staff Do Not Adequately Enforce Penalties on Noncooperative TANF Clients**

While child support workers must determine whether TANF clients are cooperating, only the public assistance agency may impose penalties on clients. Staff from the two agencies disagree regarding how strictly and swiftly penalties are imposed on clients. Sixty-three percent of child support respondents identify the lack of enforcement of penalties as a barrier to clients providing complete and accurate information about noncustodial parents. In contrast, only 10 percent of public assistance respondents identify this as a barrier. Child support respondents often express doubt that penalties are being imposed. Two child support workers describe their experience, “[*Public assistance*] won't sanction them. Very, very rarely do we get that done. We just notify them through the computer system, then I don't know what happens.” And, “We are having a problem with [*public assistance*] not sanctioning someone, where we had recommended it. We think it is because the social workers are overloaded, that it takes them too long to implement the sanction. When that happens, it leaves us impotent for a while.”

Some child support workers express frustration that the public assistance agency takes weeks or months to impose penalties, thereby delaying enforcement efforts. As stated by a child support caseworker, “[*Public assistance*] sanctions don't work because they have 100 days to appeal and the bite just isn't immediate enough. There is then little initiative to cooperate.” One State has an automatic appeal of a noncooperation determination in which TANF clients who attend a ‘reconciliation’ meeting with their public assistance caseworker, and agree to cooperate in the future, can avoid being penalized. In another State, prior to imposing penalties, public assistance caseworkers are required to reassess all TANF clients who are designated as noncooperative to determine whether they meet qualifications for good cause exceptions through which they may be exempted from cooperating. While these procedures provide safeguards against inappropriately penalizing clients, they also serve to delay penalties, possibly making clients doubt that penalties will ever be imposed. A caseworker explains, “Sometimes, a year will go by, and a sanction we have recommended has not been imposed, so there is no incentive for that client to change their behavior. They learn they can “blow us off” and nothing happens, and word of mouth gets this knowledge to others.”

Within focus States, local public assistance offices appear to develop individual norms regarding how quickly they impose penalties for noncooperation with child support enforcement. For example, we frequently heard that staff in urban offices may act

differently than those in rural communities. As one child support worker notes, *“We code them as noncooperative and then [public assistance] calls them or sanctions them. Smaller counties seem to sanction right away. The larger ones tend to call. Then they notify us that they need another appointment. Larger counties sanction more slowly. They are giving them an extra chance.”*

## **INTERAGENCY COLLABORATION**

### **While Most Public Assistance and Child Support Staff Rate Their Relationship as Effective, Many Raise Concerns About Close Collaboration**

Eighty-four percent of child support and 72 percent of public assistance respondents rate their relationship with their counterpart as effective or very effective. Some staff report they are making efforts to work together across agencies to solve common problems and reach common goals. These efforts range from formal liaison officers responsible for initiating contact between agency offices to less formal managers’ meetings or occasional staff gatherings. Workers in several offices where some effort at staff or management interaction is underway report that, while misunderstanding or mis-communication between offices does occur, their overall relationship, and therefore the quality of work, is improving. As one child support administrator relates, *“We are now working closely together on several projects. Our goals are becoming more common and closely related.”* Similarly, a public assistance administrator says, *“We are working together to achieve a positive goal. We now hold regular meetings together. There is good communication between agencies. Everyone is trying to be a part of getting clients off TANF and into the workforce.”*

Despite these generally positive perceptions of interagency relationships, several respondents from each agency express frustration or concern about working with their counterparts. Staff from both agencies claim the other agency does not understand their agency’s work. Child support staff, for example, point out that front line public assistance workers have many different responsibilities, of which child support is only one, and question the ability of public assistance staff to make gathering noncustodial parent information a priority.

Even with welfare reform increasing the importance of child support enforcement for many TANF clients, staff still perceive the mission of each agency quite differently. While staff of both agencies mostly view public assistance as a service agency designed to assist clients to gain employment and attain independence, they mostly see the child support agency as a law enforcement agency concerned primarily with collections. As one public assistance administrator expresses, *“Our mission is basically a kind of helping, giving sort of mission. I think child support’s is ... basically a police kind of vision .... We are counselors, social workers. We help people with their lives, their situations ... but child support is totally different.”* This perception of different missions appears particularly prominent among staff in States where the child support agency is part of the State judicial

system and not as common where both agencies are housed within the State's social service department.

Others respondents suggest that the difference in cultures offers an advantage to having public assistance workers collect child support information. A child support worker explains, *"The clients tend to trust the welfare staff more than they trust us. They are giving them money, [clients believe] we are giving them a hassle. So, somebody with that trust can ask questions about the father. They are with them physically and are in a much better place to get information about the case. By the time we get the case, they have been through the system and don't want to have anything to do with another government agency."*

### **Communication Between Child Support Workers and Public Assistance Workers is Limited and Sometimes Problematic, Especially Telephone Contact**

While many offices of both agencies transfer specific case information electronically or through paper forms, less formal discussion among workers does not appear to occur often. Many public assistance workers express difficulty in contacting child support workers about a client's case once the initial application process is complete. Child support workers also note problems with reaching public assistance workers to obtain additional information or to provide information about a client's cooperation status.

Many of these communication problems are technical or logistical, such as poor telephone access. Staff complain of unanswered telephones and unreturned calls from workers and managers of both agencies. In some cases, caseworkers are assigned to answer phones and direct calls at the same time they are expected to conduct client interviews. In other cases, workers suggest that telephone lines are always busy with client inquiries and that they are not furnished with private or unpublished numbers through which they could reach their counterparts.

Staff report that clients may suffer because of the inability of caseworkers to communicate in a timely manner. For example, TANF clients who have received noncooperation notices often return to their local public assistance office to resolve the situation. If they are able to explain a valid reason for a missed appointment or provide additional information, they may avoid being penalized for noncooperation. Delays in communication between agencies can make this more difficult. As one public assistance worker explains, *"[Child support workers] are not easy to get [on the phone.] When [clients] get sanctioned, we can't give out the back phone number so that clients can comply by setting appointments or giving information over the phone. It is hard to get through. Phones are always busy. Its brutal to try to call [child support workers.]"*

### **Staff in Both Agencies Receive Training About Gaining TANF Client Cooperation, But Most Training is Conducted Separately**

Seventy-five percent of public assistance respondents report their workers receive formal training about collecting information from clients for child support enforcement. Most of



these respondents, 61 percent, indicate training involves only administrators, while the remainder report that all staff receive training. Likewise, 85 percent of child support respondents report that their staff receive training on client cooperation requirements. In those offices where training does take place, it is most often conducted internally by the respondents' own agency. Seventy-nine percent of public assistance and 80 percent of child support respondents report that an administrator or staff member of their own agency usually provides training.

In an effort to improve understanding about each other's objectives, cross-training does take place in some offices. Almost a third (32 percent) of public assistance respondents and 22 percent of child support respondents report that a representative of the other agency participates as a provider of at least a portion of their training. Also, 24 percent of public assistance respondents report that child support workers attend training with them, while 23 percent of child support respondents include public assistance workers in their training.

Administrators and workers report that cross-training helps both agencies achieve their goals. For example, a child support administrator relates, *"At community meetings I discovered that when I explained child support responsibilities, many public assistance staff members did not know the importance of coding. They did not realize how important it was for interface with child support. In their training, there is not much talk about child support except that any client that has children, excepting good cause, must cooperate with child support. Just a few of the offices represented at this community meeting were aware of that. I have been advocating for nine years for interagency training."*

Public assistance staff report benefits with receiving training from the child support agency. As one worker describes, *"They were here in the office a couple weeks ago. They covered paternity issues like how to complete the form on absent parent information. They want us to provide as much information as we can so the client doesn't have to repeat it at a child support interview."* Other respondents report that training about child support information requirements has helped them understand why certain information is important and how much child support workers depend upon complete and accurate information from the custodial parent. Child support workers also say that cross-training has helped them better understand the demands and problems public assistance workers face in handling their caseloads.

### **Staff Report Co-location and Out-stationing of Child Support Staff Can Promote Improved Interagency Communication**

A number of respondents report having child support and public assistance offices in the same place, commonly called co-location. Other respondents report that child support staff work at their public assistance offices either full-time or on a scheduled basis, often called out-stationing. Many credit these arrangements with improving communication between agencies. One public assistance administrator reports, *"The co-location of staff helps build the relationship between offices. It helps clients and staff from both agencies*

*communicate more effectively and builds understanding between the agencies.” A public assistance worker says, “The co-located person makes a lot of difference to communication. It is really easier than it was before to get information you need.” Another public assistance worker emphasizes the benefit of having a child support worker located in their office, “We often have to ask workers specific questions on cases we are working. [Having the child support] worker in this office has been very nice, and very helpful to us. When I have a question, she is great.”*

Child support staff also see value in co-location, as one respondent explains, “When clients are here, they can also see me. Having a child support worker here is a “one-stop shopping” kind of thing. They can get information on a case. I also maintain a close relationship with the benefit workers here. It is a quicker access to the information we need. I can just knock on a door, without telephone calls or a paper trail. It helps the coordination of the two agencies in many ways and makes things a lot simpler for communication.”

# RECOMMENDATIONS

Successful operation of the child support enforcement program requires effective, cooperative action by both the Office of Child Support Enforcement and the Office of Family Assistance. Therefore, we recommend that the Assistant Secretary for the Administration for Children and Families (ACF) encourage States to:

## **Focus Public Assistance Information Gathering on Specific Facts About Noncustodial Parents That Are Most Useful for Enforcement**

When public assistance staff obtain critical information about noncustodial parents, such as Social Security number and current employer, child support enforcement is often accelerated. Although child support staff may find additional information, such as address or schools attended, useful in locating absent parents, public assistance staff may be less successful in obtaining the most critical information when they are asked to collect more than is realistic. ACF should encourage States to clarify and prioritize the child support information they most want from these necessarily brief public assistance interviews and to provide staff guidance on how best to elicit priority information.

## **Explore Ways to Enhance Public Assistance Staff Access to Information Verification Tools, Potentially Easing the Information Collection Process**

Staff of both agencies report that access to information verification tools, such as driver's license and State employment databases, enhances their ability to obtain complete and accurate information from clients. While most child support workers appear to use such tools, many public assistance workers lack access, yet could benefit from it. The ability to quickly verify information provided by clients could make information collection easier and the use of limited interview time more efficient.

## **Continue to Improve Systems Which Allow the Exchange of Information Between Public Assistance and Child Support Enforcement Agencies**

Child support staff often rely on information about noncustodial parents which clients provide during interviews with public assistance workers. Expanding child support access to client information, while insuring client confidentiality, can allow child support workers to begin locate and enforcement efforts earlier. ACF should encourage States to utilize strategies which enhance the exchange and use of information among agencies.

## **Work with Local Public Assistance Offices to Insure That Penalties for Noncooperation with Child Support Are Properly Imposed**

Staff report that most TANF clients who are penalized for noncooperation with child support enforcement eventually cooperate. However, when threatened penalties are delayed or never imposed, clients may begin to believe that cooperation is unimportant

and that noncooperation has no negative consequences. ACF should encourage States to insure that public assistance agencies properly impose penalties on noncooperative TANF clients consistently and timely, while protecting due process safeguards.

### **Strengthen Interaction, Cross-Training, and Communication Between Their Public Assistance and Child Support Enforcement Agencies**

Interagency meetings, cross-training and regular communication at the management and staff level can help identify barriers to collaboration, develop joint objectives among child support and public assistance agencies, provide staff with opportunities to develop contacts for information exchange or help with particular clients. ACF should encourage State agencies to engage in more interaction at all levels, and provide the means, such as dedicated telephone lines, by which staff can routinely communicate with their counterparts.

ACF did not provide comments in response to our draft report and recommendations.

## ENDNOTES

1. See our companion report, Client Cooperation With Child Support Enforcement: Use of Good Cause Exceptions, OEI-06-98-00043, 2000.
2. Social Security Act, Title IV, Part A., Sec. 408 (2).
3. Social Security Act, Title IV, Part A., Sec. 409 (5).
4. For information regarding gaining client cooperation with child support enforcement from individuals receiving Medicaid, but not TANF, see our report, Client Cooperation with Child Support Enforcement: Medicaid-Only Clients, OEI-06-98-00045, 2000.
5. *Ibid*, OEI 06-98-00043, 2000.
6. For more information on interviews conducted by child support staff, see our companion report, Client Cooperation With Child Support Enforcement: Policies and Practices, OEI 06-98-00040, 2000.
7. See our companion report, Client Cooperation With Child Support Enforcement: Challenges and Strategies to Improvement, OEI 06-98-00041, 2000.
8. *Ibid*, OEI 06-98-00041, 2000.