

**Department of Health and Human Services**

**OFFICE OF  
INSPECTOR GENERAL**

**PATERNITY ESTABLISHMENT**

**Use of Alternative Sites for  
Voluntary Paternity Acknowledgment**



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Inspector General**

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06-98-00052**

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# **Use of Alternative Sites for Voluntary Paternity Acknowledgment**

## **PURPOSE**

This report describes the early implementation efforts of State child support agencies to offer voluntary paternity acknowledgment services through alternative sites.

## **RESULTS IN BRIEF**

We found about half of the States currently offer acknowledgment services through some of their public assistance offices. Few States, however, have yet expanded services to other sites that child support agencies believe are potentially important to their paternity establishment efforts. State efforts to encourage participation have met reluctance by some entities due to time demands on limited staff and lack of financial incentives. Typical services offered through alternative sites include distribution of public outreach materials explaining voluntary acknowledgment and, to a lesser degree, personal assistance to parents in completing paternity acknowledgments. Many State child support agencies have yet to develop adequate methods of monitoring and evaluating alternative sites. We offer a number of suggestions to promote use of alternative sites by capitalizing on and refining effective practices now being used in some localities.

## **BACKGROUND**

As part of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, Congress requires State child support agencies to provide voluntary paternity acknowledgment services through in-hospital acknowledgment programs and through “the State agency responsible for maintaining birth records.”<sup>1</sup> To further expand services to unmarried parents, the Act allows, but does not require, States to offer acknowledgment services through “other entities.”<sup>2</sup> If States use this added flexibility to expand acknowledgment services, the law requires State child support agencies to administer alternative sites in the same manner as in-hospital programs.

The Office of Child Support Enforcement (OCSE) recently issued regulations on paternity establishment.<sup>3</sup> These regulations specify that “... State procedures governing hospital-based programs and birth record agencies must also apply ...” to alternative sites designated by the State. The regulations also impose certain requirements on alternative sites involved in acknowledgment efforts, including “... undergoing training, being evaluated annually, providing oral and written information to mothers and putative fathers, and transmitting the acknowledgments to the State registry of birth records.” States may decide which entities to use, but OCSE regulations provide a list of possible alternative sites including child support, public assistance, and food stamp offices, public health clinics (including WIC centers), private health care providers, Head Start and child care facilities, child care providers, Community Action

Agencies and Community Action Programs, secondary schools, Legal Aid agencies, private attorneys, and similar entities that provide health, welfare and/or social services.

This report focuses on expansion of acknowledgment services through these discretionary alternative sites. Excluded from this discussion are the voluntary paternity acknowledgment services provided through hospitals, other birthing centers, vital records offices and local child support offices.<sup>4</sup> We received survey responses on alternative site activity from all States and the District of Columbia.<sup>5</sup> The following preliminary findings are provided to assist OCSE in its efforts to monitor State progress and provide technical assistance to promote early implementation efforts.

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

## **FINDINGS**

### ***Public Assistance Agencies Participate in Voluntary Paternity Acknowledgment Efforts in Twenty-six States.***

State child support agencies have involved public assistance offices in acknowledgment efforts more frequently than other alternative sites. Sixteen States report offering acknowledgment services through one hundred percent of local public assistance offices, while ten other States report partial implementation. Providing voluntary acknowledgment services through public assistance offices seems a natural fit in many States for several reasons. These agencies administer Temporary Assistance to Needy Families programs and often handle eligibility for Medicaid, food stamps and other human service programs. Caseworkers at public assistance offices often see clients with children who do not have paternity established. Clients may feel more comfortable dealing with their public assistance caseworker who assists them with child care, transportation and work-related matters. Application and re-determination interviews provide opportunities for clients to receive information and sign voluntary paternity acknowledgment forms. Additionally, in many States, child support and public assistance agencies have very strong inter-agency relationships, making training and coordination efforts less challenging than with other alternative sites.

### ***Participation by Entities Other Than Public Assistance Offices is Still Very Limited.***

State child support agencies have begun to offer voluntary acknowledgment services through a variety of other alternative sites. Table 1 lists the number of States that report using alternative sites in their acknowledgment programs.<sup>6</sup> Two sites on the list, public health clinics and food stamp offices, may be viewed as expansions of service within agencies that already offer acknowledgment services. In many States, public health clinics, the second most frequently used alternative site, are administered through the vital records agency. Therefore, many of these States have simply expanded voluntary acknowledgment services beyond their vital records offices to public health clinics. Similarly, food stamp programs are often administered through

public assistance offices. Other activities, however, clearly represent expansions of service to new locations. Several States now use Women, Infant and Children (WIC) centers, high schools and Head Start agencies in their acknowledgment programs. Some additional entities, such as fatherhood organizations, appear to offer voluntary acknowledgment services, yet may not be counted as alternative sites by State child support agencies.<sup>7</sup>

<b>TABLE 1: Participation and Importance of Alternative Sites in State Voluntary Paternity Acknowledgment Programs</b>		
<b>Alternative Site</b>	<b>States Currently Using Site</b>	<b>States Considering Site 'Important'</b>
Public Assistance Offices	26	36
Public Health Clinics	15	26
High Schools	11	18
Food Stamp Offices	10	21
Head Start Agencies	9	21
Private Doctors' Offices	9	19
WIC Centers	8	22
Middle Schools	5	12
Medicaid HMO Facilities	2	16
Pre-natal Clinics	N/A	26

It is important to note that the responses summarized in Table 1 do not reflect the extent to which a particular site participates Statewide. That is, use of an alternative site may occur in only one or a few locations within a State. Some State child support agencies are testing alternative sites through 'pilot' programs or have initiated participation only in selected geographic areas which may be expanded in the future.

***Participation by Certain Alternative Sites is Seen as Important by Child Support Agencies.***

As listed in Table 1, State child support agencies believe participation by several alternative sites is important to their voluntary paternity establishment programs. More than half of States view public assistance offices, public health clinics and pre-natal clinics as important sites for acknowledgment services. More than a third of States consider WIC centers, Head Start offices, food stamp offices, doctors' offices and high schools as potentially important to their acknowledgment programs. However, many of the possible alternative sites listed in OCSE regulations are not viewed as important by most respondents. For example, only nine respondents indicated that providing voluntary acknowledgment services through child care

providers would be important to their program. As expected in early implementation, more States view alternative sites as important than currently use those sites in their acknowledgment efforts.

***Most State Child Support Agencies Have Made at Least Some Outreach Efforts to Alternative Sites, But Some Entities are Reluctant to Participate.***

To expand acknowledgment services, most States have made contact with other entities. Fifteen State child support agencies, however, report making no efforts to expand acknowledgment services to alternative sites.<sup>8</sup> Most agencies indicate they use one of the following methods to attract new participants: presentations at meetings and/or conferences (33 States), conversations between key personnel (28), memos/letters sent to alternative site local offices (21), or phone calls to alternative site local offices (16). According to one child support administrator responsible for outreach to other entities, personal contact is critical because key people at the alternative sites must be committed to the program. This official offered several examples of sites that participated in paternity establishment efforts, but failed to generate many acknowledgments. He suggested that other sites were more successful because their leaders were committed to the project and encouraged staff to discuss voluntary paternity acknowledgment with clients.

Most State child support agencies who have conducted outreach report that some entities are reluctant to provide voluntary acknowledgment services. Although only three States report reluctance by “most” or “all” alternative sites contacted, another twenty States report reluctance by half or fewer contacted sites.<sup>9</sup>

***Lack of Resources is Cited as the Most Significant Barrier to Participation of Alternative Sites.***

State child support agencies identified barriers that hamper participation by alternative sites. In general, other entities often see the voluntary paternity acknowledgment program as a potential drain on limited staff time. Twenty-eight States report sites they approached were “too busy with their primary function” and 25 States responded that entities “lacked the manpower to offer such services.” Fourteen States report the absence of any financial incentive is a barrier to participation. Despite having the authority to use Federal matching funds to pay other entities for completed paternity acknowledgments, only four State child support agencies report paying alternative sites for any services. By comparison, 20 State child support agencies paid hospitals for completed voluntary acknowledgments in 1996.<sup>10</sup>

***Most Participating Alternative Sites Provide Forms and Written Materials, But May Not Actually Assist Parents in Completing Paternity Acknowledgments.***

Table 2 shows the number of States in which alternative sites are providing different types of acknowledgment services. The most common service is provision of outreach materials to the general public. Typical outreach materials are wall posters, brochures or pamphlets that explain the mechanics and benefits of voluntary paternity acknowledgment. In several States, alternative sites currently participate in outreach, but offer no further services such as making

acknowledgment forms available to the public. While 21 States report that their public assistance agencies distribute acknowledgment forms, only a handful of States currently make acknowledgment forms available through high schools, WIC Centers, or Head Start facilities. Some alternative sites also provide personal assistance to individuals and accept completed acknowledgment forms. Personal assistance may include notification of rights and responsibilities,<sup>11</sup> or guidance on how to present the idea of acknowledging to the other parent. Fewer alternative sites accept acknowledgment forms from the public and forward them to the appropriate agency (typically the child support agency or the vital records agency.) As shown in the last column of Table 2, only 15 States report that even their public assistance agencies currently provide this higher level service.

<b>Alternative Site</b>	<b>Outreach Materials</b>	<b>Acknowledgment Forms</b>	<b>Personal Assistance</b>	<b>Accept &amp; Forward Forms</b>
Public Assistance Offices	26	21	17	15
Public Health Clinics	15	13	8	4
High Schools	11	4	3	3
Food Stamp Offices	10	7	6	4
Private Doctors' Offices	9	5	1	1
Head Start Facilities	9	5	5	4
WIC Centers	8	5	4	2

***Most State Child Support Agencies Provide Training or Materials to Alternative Sites, and Some Have Begun to Monitor Their Performance.***

Thirty-five State child support agencies report providing materials or training to other entities. Additionally, vital records agencies perform some of these tasks in 15 States.<sup>12</sup> In nine States, however, neither the child support agency nor the vital records agency report providing any training or materials to other entities. Eighteen State child support agencies report monitoring the performance of most or all alternative sites, and an additional three States said their vital records agency performs this monitoring function. The most common form of monitoring involves tracking the number of acknowledgments generated through individual sites. Fourteen State child support agencies and three vital records agencies monitor alternative sites by this method. However, fewer than ten States report tracking alternative sites through more in-depth methods such as personal conversations, telephone calls or on-site visits. Even less monitoring of acknowledgment services may occur with entities that are not officially considered alternative sites, such as fatherhood organizations. One approach to monitoring alternative sites was developed for Cook County, Illinois where a single unit (3-4 staff members) acts as a liaison with

all alternative sites. This unit maintains contact with participating entity staff and insures periodic training.

## **RECOMMENDATIONS**

While State programs to offer voluntary paternity acknowledgment services through alternative sites are still in early stages of development, many preliminary efforts appear promising. Therefore, we recommend that the Office of Child Support Enforcement (OCSE) capitalize on these early efforts by promoting refinement of potentially effective approaches. As we offer these suggestions, we recognize that OCSE has already taken action to promote innovation in acknowledgment services. For example, OCSE's 8<sup>th</sup> National Training Conference highlighted effective practices in a session on expanding voluntary acknowledgment services through alternatives sites.

### ***Focus technical assistance on the most promising sites.***

States are using the flexibility afforded by welfare reform legislation and OCSE regulations to expand voluntary paternity acknowledgment services offered through alternative sites, especially public assistance agency offices. Although OCSE regulations list a large number of potential sites, our research suggests that a few (public health and pre-natal clinics, WIC centers, food stamp offices, Head Start agencies, doctors' offices and high schools) clearly have the greatest potential. To maximize the impact of technical assistance, OCSE should primarily focus on helping States expand services through these sites.

### ***Minimize complexity for participating entities.***

Lack of staff is viewed as a significant barrier to participation by alternative sites. To address this barrier, OCSE should assist States in simplifying the role of alternative site staff in the voluntary paternity acknowledgment process. For instance, several states have established toll-free phone lines through which parents may hear a recorded explanation of the rights and responsibilities of acknowledging paternity or talk directly with a child support specialist. Many States have also simplified processes through which sites may order needed materials or arrange for training of new staff. These efforts reduce the burden on alternative site staff, while insuring that parents may obtain accurate, consistent information.

### ***Encourage full-service participation.***

While most participating alternative sites provide public outreach materials about voluntary acknowledgment of paternity, many do not offer full services that would enable parents to complete and submit acknowledgments through the site. By encouraging alternative sites to assist parents in completing voluntary acknowledgments, State child support agencies could increase the use of acknowledgments and better utilize resources devoted to alternative sites. To accomplish this goal, at least one State makes the percentage of cases with paternity established a performance measure for its local public assistance office managers. Thus, these managers have a



direct incentive to give their staff the training and resources to assist parents in completing voluntary paternity acknowledgments.

***Consider developing incentives for alternative site participation.***

Lack of financial incentives is seen as a significant barrier to participation by other entities. Payment for completed voluntary acknowledgments, which currently occurs in only a few States, may be one way to encourage alternative site participation. States might focus financial incentives on sites - such as public assistance offices and public health clinics - which are full service sites, appear to be promising, and are regarded as important by State child support officials. However, some State child support administrators surveyed considered payment for acknowledgments akin to offering a “bounty” for completed acknowledgments. On the other hand, others view a small (\$10 - \$20) payment as minimal compensation for assisting the State in the important task of paternity establishment.

***Encourage State agencies to more closely monitor sites.***

While virtually all States provide training or materials to participating alternative sites, relatively few appear to monitor the performance of these sites. Monitoring not only allows State child support agencies to review the performance of sites, it also helps insure consistent service to parents. To encourage monitoring, OCSE may wish to highlight the activities of States that do actively monitor alternative sites. At a minimum, effective monitoring involves tracking the amount of outreach materials distributed through other entities and the number of acknowledgments completed at sites. More extensive methods may include periodic visits to sites to conduct training and assess progress.

**AGENCY COMMENTS**

The Administration for Children and Families (ACF) notes that OCSE has made a commitment to State development of alternative sites by allowing States to provide up to \$20 to hospitals, State birth record agencies, and other entities designated by the State and participating in the State’s voluntary paternity establishment program for each voluntary acknowledgment obtained pursuant to an agreement with the child support agency.<sup>13</sup> ACF also anticipates that, in an effort to increase paternity establishment ratios to the levels PRWORA requires, States will work closely with, and monitor, the progress of paternity acknowledgment in alternative sites.

While ACF’s comments reaffirm that financial incentives are available for alternative sites, our study shows that few States as yet pay alternative sites. On this issue and others addressed in our recommendations, we continue to believe that States could benefit from further Federal leadership and focused technical assistance as they seek to expand voluntary paternity acknowledgment services through alternative sites.

ACF’s comments are provided in their entirety in Appendix A.

## ENDNOTES

1. The State agency responsible for maintaining birth records is also known as the vital records agency or the public health statistics agency. We use the term 'vital records agency' in this report.
2. The terms 'alternative sites' and 'other entities' are used interchangeably here.
3. OCSE Action Transmittal 99-02 (March 10, 1999).
4. Our office previously evaluated in-hospital voluntary paternity acknowledgment programs and presented the results in August of 1997 in a series of four reports entitled In-Hospital Voluntary Paternity Acknowledgment Program: State Agency and Birthing Hospital Implementation (OEI-06-95-00160); Hospital Experiences in Sample States (OEI-06-95-001610); Effective Practices in Hospital Staff Training (OEI-06-95-00162); and Effective Practices in Parent Outreach (OEI-06-95-00163). Also, see our companion reports Paternity Establishment: Use of Voluntary Paternity Acknowledgments (OEI 06-98-00053) and Paternity Establishment: States Use of Genetic Testing (OEI 06-98-00054).
5. While every State returned the survey, three States did not fill out a series of questions on other entities. Other questions on alternative sites were answered by varying numbers of respondents. The effect, if any, of non-response to individual questions is that our findings may understate actual alternative site activity.
6. This table does not include sites that fewer than twelve State child support agencies believed would be important to their voluntary paternity program.
7. Our data collection concentrated on the other entities suggested in OCSE Action Transmittal 98-01 (January 8, 1998) and, therefore, did not ask about fatherhood organizations or other community based organizations (CBOs). One State did report contacting CBOs to offer acknowledgment services and fatherhood organizations have publicized offering services to assist fathers in acknowledging paternity. Any unofficial involvement of CBOs may create problems for State child support agencies, however, because they may lack mechanisms through which to monitor or evaluate the efforts of these organizations.
8. Some of these fifteen States may not yet use voluntary paternity acknowledgments outside hospitals and birthing centers. For more details, see our companion report, Paternity Establishment: Use of Voluntary Paternity Acknowledgments (OEI 06-98-00053).
9. By contrast, 14 States report no reluctance at all by the alternative sites approached to provide acknowledgment services.
10. As indicated in our report, In-hospital Voluntary Paternity Acknowledgment Program: State Agency and Birthing Hospital Implementation (OEI-06-95-00160), August, 1997.

11. If an alternative site distributes acknowledgment forms, it is required to provide parents with written and oral notification of their rights and responsibilities regarding voluntary paternity acknowledgment. For more details, see our companion report, Paternity Establishment: Notification of Rights and Responsibilities for Voluntary Paternity Acknowledgment(OEI 06-98-00051).

12. Nine State vital records offices conduct on-site training of alternative site staff. For more details see our companion report, Paternity Establishment: The Role of Vital Records Agencies (OEI 06-98-00055).

13. While the original ACF Response in Appendix A suggests that other entities must provide prenatal or birthing services to be eligible for the \$20 payment, OCSE clarified that States could provide payment to any alternative site participating in the State's voluntary paternity establishment program pursuant to an agreement with the child support agency, as indicated in OCSE Action Transmittal 99-02.

AGENCY COMMENTS

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DEPARTMENT OF HEALTH & HUMAN SERVICES

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ADMINISTRATION FOR CHILDREN AND FAMILIES  
Office of the Assistant Secretary, Suite 600  
370 L'Enfant Promenade, S.W.  
Washington, D.C. 20447

**DATE:** June 4, 1999

**TO:** June Gibbs Brown  
Inspector General

**FROM:** — Olivia A. Golden  
Assistant Secretary  
for Children and Families

**SUBJECT:** OIG Draft Reports "Paternity Establishment Notification of Rights and Responsibilities for Voluntary Paternity Acknowledgement"(OEI-06-98-00051); "Paternity Establishment Payment to Vital Records Agencies"(OEI-06-98-00056); and "Paternity Establishment Payment to Vital Records Agencies" (OERI-06-98-00052).

Thank you for the opportunity to comment on the above-captioned reports. If you have questions, please contact David Ross, Commissioner, Office of Child Support Enforcement, at (202) 401-9370.

Attachment

**COMMENTS OF THE ADMINISTRATION FOR CHILDREN AND FAMILIES ON THE OFFICE OF INSPECTOR GENERAL DRAFT REPORTS: "PATERNITY ESTABLISHMENT NOTIFICATION OF RIGHTS AND RESPONSIBILITIES" (OEI-06-98-00051); "PATERNITY ESTABLISHMENT PAYMENT TO VITAL RECORDS AGENCIES" (OEI-06-98-00056); AND "PATERNITY ESTABLISHMENT USE OF ALTERNATIVE SITES FOR VOLUNTARY PATERNITY ACKNOWLEDGMENT" (OEI-06-98-00052).**

**General Comments:**

The Federal Office of Child Support Enforcement (OCSE) would like to thank the Office of Inspector General (OIG) for being given the opportunity to comment on these three draft reports. We would like to generally note the quality of the reports and we are pleased that OCSE's significant work in this area is noted.

**Background:**

Paternity establishment is a crucial step to establishing a legal relationship between a child and father. Paternity establishment can provide basic emotional, social, and economic ties between a father and his child. It can also provide a child with legal rights and privileges including rights to inheritance, rights to a father's medical and life insurance benefits, and to social security and possibly veteran's benefits. It also provides a child the opportunity to develop a sense of identity and connection with the father, and may be important for the health of the child for doctors to have knowledge of the father's medical history. Paternity establishment is also the first step to establishing an enforceable child support order.

The administration has made paternity establishment a top priority. In fiscal year 1997, an estimated 1.28 million paternities were established and acknowledged. Of these, nearly 480,000 were in-hospital paternities that were voluntarily acknowledged. The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) streamlined the legal process for paternity establishment and required States to publicize the availability of and encourage the use of the paternity establishment process.

**OIG Recommendation:**

OCSE should encourage outreach by child support offices to educate service providers about their responsibility to provide oral notification for parents, and simplify the language used.

**ACF Response:**

OCSE has taken a number of steps to encourage State child support enforcement offices to provide information about the oral notification requirements. For example: soon after the passage of PRWORA in 1996, OCSE worked with our State partners to develop and issue a number of "legislative implementation guides" one of which was devoted to paternity establishment. It contained a "plain English" version of the new requirements and provided examples of State practices that were particularly good. OCSE and our State partners

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disseminated these guides widely, in an attempt to educate service providers about their new responsibilities. In the years following the enactment of PRWORA, OCSE has held a number of conferences in which the new paternity requirements were discussed. OCSE has also amended its paternity regulations to require States to have in effect laws requiring parents to be given both oral and written notice of the rights and responsibilities of acknowledging paternity, and to have safeguards in place to ensure that due process protections are afforded to both parents (see 64 FR 11802, March 10, 1999). Regarding the OIG's recommendation to encourage States to simplify the language they use in their documents, OCSE tries to ensure that its own documents are written clearly, and in plain English, and we will encourage our State partners to do the same.

We would like to note that on page 1 of the report on the notification of rights and responsibilities for voluntary paternity acknowledgment, it indicates that PRWORA requires mothers and putative fathers to be given notice that the father's name not be added to the birth certificate without a signed acknowledgment of paternity. We believe that this is a misreading of the law, which requires that the father's name may not go on the birth certificate unless he has acknowledged paternity. However, this requirement is not part of the rights and responsibilities language in the statute.

Page 2 of that report refers to the "proposed rule" on paternity establishment, which has now been issued in final (see 64 FR 11802, March 10, 1999).

### **OIG Recommendation:**

OCSE should promote use of innovative paternity establishment practices.

### **ACF Response:**

OCSE endeavors to promote innovative State practices on a wide variety of areas, including paternity establishment, and will continue to do so. Several examples of the way in which innovative paternity practices are promoted are: 1) publication of examples in the OCSE *Best Practices* guide; 2) discussion of innovative practices at OCSE conferences; and, 3) articles in the OCSE *Child Support Report* describing new practices.

### **OIG Recommendation:**

OCSE should clarify that matching funds may be used to reimburse vital records agencies for reasonable paternity establishment expenses, and should allow reasonable State discretion, in view of the wide variety of State funding, policy and practice.

### **ACF Response:**

We are willing to work with our State partners to determine the best way to assist the vital records community establish paternity for the nation's children, but we are unable to support this recommendation. As we stated in the final rule on paternity establishment (64 FR 11802, March 10, 1999), according to the OMB Circular A-87, "Cost Principles for State and Local Governments"; the general rule governing this issue is that Federal funds are not available to

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offset the general costs of a State or local government. That is, Federal funds may not be used to finance general types of government services normally provided to the public, such as filing birth records. For that reason, FFP is not available to reimburse a State or local vital records agency that has responsibility for maintaining paternity acknowledgments. FFP is also not available to reimburse a State or local vital records office for the costs of establishing a system to process or store paternity affidavits because those activities are required of those entities under State law.

### **OIG Recommendation:**

OCSE should capitalize on voluntary paternity acknowledgment in alternative sites, including focusing technical assistance on the most promising sites; minimizing complexity for participating entities; encouraging full-service participation; considering developing incentives for alternative site participation; and encouraging State agencies to monitor sites more closely.

### **ACF Response:**

OCSE has made a commitment to State development of alternative sites by allowing States to provide up to \$20 to birthing hospitals and other entities that provide prenatal or birthing services for each voluntary acknowledgment of paternity they obtain pursuant to an agreement with a IV-D agency. We anticipate that, in an effort to increase their paternity establishment ratios to the levels PRWORA requires, States are working closely with, and monitoring, the progress of voluntary paternity acknowledgment in alternative sites.

In the last paragraph of page one of the report, please note that the paternity establishment regulations have now been issued in final (see 64 FR 11802, March 10, 1999), the report refers to proposed regulations.

The OIG might also want to consider updating the endnotes on page 8 of this report to refer to OCSE Action Transmittal 99-02, March 10, 1999.