Department of Health and Human Services

OFFICE OF INSPECTOR GENERAL

CLIENT COOPERATION WITH CHILD SUPPORT ENFORCEMENT

Challenges and Strategies to Improvement

JUNE GIBBS BROWN
Inspector General

MARCH 2000
OEI-06-98-00041

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 challenges States face in gaining cooperation with child support enforcement from Temporary Assistance for Needy Families (TANF) clients and strategies States use to improve cooperation.

BACKGROUND

Federal law requires TANF recipients to cooperate with State child support enforcement agencies in establishing paternity and in creating and enforcing child support and medical support orders. Child support staff use the information provided by clients to locate a noncustodial parent or putative father, establish paternity, create a child support order, and/or enforce a prior obligation. These tasks are easier to accomplish when clients cooperate. While most TANF clients do cooperate, some may face barriers or disincentives to cooperating. State child support and public assistance agencies attempt to overcome these challenges through client education and procedural improvements, and by imposing penalties on clients who do not cooperate. This report describes challenges to improving TANF client cooperation with child support enforcement identified by child support and public assistance staff in six focus States which we chose in order to examine a variety of implementation experiences regarding client cooperation. It also examines strategies these States employ to improve cooperation when clients are reluctant, or fail to cooperate. We gathered survey information and reviewed documents from 99 local child support and 103 local public assistance offices, and interviewed approximately 180 managers and caseworkers.

FINDINGS

Some TANF Clients Face Barriers That Prevent Them from Providing Sufficient Information, or Otherwise Cooperating, and Some May Also Have Disincentives to Cooperating

The majority of TANF recipients and applicants appear to cooperate with child support enforcement. However, lack of knowledge about noncustodial parents, lack of understanding of cooperation requirements, and limited interview time may hinder some clients from providing information about noncustodial parents. Other logistical barriers, such as lack of transportation, may hinder clients as they attempt to meet with child support staff. Many respondents report that TANF clients may also have strong personal and financial incentives not to cooperate with child support enforcement.

State Agencies Employ A Variety of Strategies for Surmounting Challenges to Client Cooperation, Focusing on Improving Services and Imposing Penalties

Local offices encourage cooperation by enhancing staff interview skills to improve clients' understanding of the benefits of child support and to elicit more complete and accurate information about noncustodial parents. Staff also encourage cooperation by educating clients about the potential benefits of paternity establishment and pursuing child support. Some offices ease cooperation by completing multiple tasks during appointments at child support offices and by assisting clients in gathering information about noncustodial parents. Staff in other offices avoid "no-shows" by reducing the need for clients to make separate appointments at the child support enforcement office.

When Encouragement Fails, States May Threaten or Actually Impose Penalties to Motivate TANF Clients to Cooperate With Child Support Enforcement

Many respondents believe the threat of penalties influences TANF clients to cooperate, while a few believe threats exert only a limited influence on clients. Nearly all public assistance respondents report most TANF clients who are penalized eventually cooperate, regardless of the type of penalty imposed.

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.

Reassess Policies Requiring Redundant Client Visits to Child Support Offices When Sufficient Information About Noncustodial Parents Has Already Been Gathered

Evaluate Current Policies That May Create Disincentives for Client Cooperation

Train Front Line Staff in Skills Designed to Encourage Client Cooperation

Use Innovative Strategies to Make it Easier for TANF Clients to Cooperate With Child Support Enforcement

Evaluate the Advantages and Disadvantages of Delaying Cash Assistance Until Child Support Staff Determine an Applicant Has Initially Cooperated

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 polices and how they are implemented by States. Another report, *Client Cooperation with Child Support Enforcement: The Role of Public Assistance Agencies* (OEI-06-98-00042), discusses responsibilities of public assistance agencies and collaboration between agencies. 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

	PAGE
EXECUTIVE SUMMARY	i
INTRODUCTION	1
FINDINGS	
Challenges to Client Cooperation	4
Strategies to Improve Client Cooperation	7
Imposing Penalties for Noncooperation	13
RECOMMENDATIONS	16
ENDNOTES	18

INTRODUCTION

PURPOSE

To describe challenges States face in gaining cooperation with child support enforcement from Temporary Assistance for Needy Families (TANF) clients and strategies States use to improve cooperation.

BACKGROUND

Federal law has long required public assistance clients to cooperate with State child support enforcement authorities in establishing paternity and creating and enforcing child support and medical support orders. 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,[1] TANF clients must name and provide information about the noncustodial parent of their children, and otherwise cooperate as determined by the State.[2] 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.[3] 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.[4]

Client cooperation is a critical first step of child support enforcement. States require TANF clients to provide information about noncustodial parents or putative fathers, keep various appointments, and submit to genetic testing. Child support staff use the information provided by clients to locate a noncustodial parent or putative father, establish paternity, create a child support order, and/or enforce a prior obligation. When clients cooperate, these tasks are easier to accomplish. Clients, however, may face barriers or disincentives which keep them from cooperating. State child support and public assistance agencies may attempt to overcome these challenges through various strategies, including client education, procedural improvements, and by imposing penalties on clients who do not cooperate. This report describes challenges to TANF client cooperation with child

support enforcement as identified by child support and public assistance staff in six focus States. It also examines strategies these States employ to gain the cooperation of clients who are reluctant, or fail to cooperate.

METHODOLOGY AND SCOPE

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 polices and how they are implemented by States. Another report, *Client Cooperation with Child Support Enforcement: The Role of Public Assistance Agencies* (OEI-06-98-00042), discusses responsibilities of public assistance agencies and collaboration between agencies. 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

Child support staff in focus States report that most TANF clients provide enough useful information to pursue child support.[5] Furthermore, staff of both agencies believe it is fairly easy for clients to meet their State's cooperation requirements.[6] However, our research also indicates that clients may face barriers that prevent them from providing sufficient information, or otherwise cooperating, and that they may also have incentives not to cooperate. To address these challenges, child support and public assistance agencies attempt to surmount barriers and encourage cooperation by improving procedures and by educating clients regarding the benefits of paternity establishment and child support, as well as the consequences of noncooperation. When encouragement fails, States impose penalties, which appear to motivate many TANF clients to cooperate.

CHALLENGES TO CLIENT COOPERATION

Barriers, Such as Lack of Knowledge, May Hinder TANF Clients from Providing Information about Noncustodial Parents

As shown in Table 1, child support and public assistance staff in focus States agree some clients cannot provide information about noncustodial parents because they lack the knowledge. Clients may either know little about a noncustodial parent or be unsure of the identity of the father of a child. Staff report that lack of knowledge is more frequent in cases with older children, because clients may not have seen or heard from the noncustodial parent in years. When mothers are unsure who the father of a child is, genetic testing can typically identify the father if the mother provides enough information to allow him to be tested.[7]

Table 1: Barriers to Provision of Complete, Accurate Information about Noncustodial Parents

Barrier	Child Support Respondents	Public Assistance Respondents
Client knows little about noncustodial parent	78 % (76 offices)	82 % (84 offices)
Client does not know the identity of the father	68 % (66)	64 % (65)
Client does not understand requirements	35 % (34)	23 % (23)
Paperwork too difficult	18 % (17)	14 % (14)
Too little time with caseworker to build trust	13 % (13)	45 % (46)
Lack of staff training	11 % (11)	14 % (14)
Interview too brief to gather information	11 % (11)	24 % (24)

Even when clients have useful information, they may fail to provide it completely and accurately because they do not understand they are required to, and because they find the paperwork too difficult. Also, client interviews are often brief, and staff may not be adequately trained to encourage clients to provide maximum information. Almost half of public assistance offices (45 percent) report that TANF client interviews are too short to allow caseworkers the chance to gain client confidence, yet few child support offices (13 percent) see this as a barrier. Local public assistance staff explain that gaining client confidence is critical to their agency's long-term goals of helping clients find employment and achieve independence, as well as short-term objectives such as gathering information about noncustodial parents. They complain, however, that seeking personal information involving a client's relationship with a noncustodial parent, particularly during initial interviews, often strains their efforts to gain the client's confidence.

Some TANF Clients May Routinely Be Required to Meet With Child Support Staff in Addition to Their Public Assistance Interview, Posing Logistical Barriers for Clients, Such as Lack of Transportation and Inconvenient Appointment Times

The child support agency in one focus State requires that all newly approved TANF recipients attend personal interviews with child support staff. Some local child support staff in other States also report routinely requiring interviews with all TANF clients. Workers suggest problems with this practice of mandatory interviews. They complain that many of these interviews never need to occur, often because clients have provided sufficient information during their interview with public assistance staff. When scheduled unnecessarily, these interviews tend to frustrate both the client and worker, and may make the client less likely to appear for appointments in the future. Therefore, staff report the no-show rate for these interviews is very high, often because the client knows they have already provided all available information. Overall, 53 percent of local child support respondents report most or all public assistance clients personally interview with a child support worker at some time during the enforcement process, 21 percent report about half of clients have such an interview, and 26 percent report fewer than half of TANF clients interview with child support staff.

Some clients have difficulty keeping appointments with child support and public assistance staff for logistical reasons. Transportation to agency offices is often a problem for clients with limited resources, especially in some rural areas where single offices service multiple counties. One worker in a rural office describes, *"The clients who live farther out don't have transportation. It's up to 40 or 50 miles. A very legitimate problem."* Staff in several offices report that public transportation, even bus lines, are not available as a practical means of traveling to their offices.

The scheduling of appointments may also present problems. Public assistance workers report that clients complain of receiving notices from child support offices for appointments scheduled during regular business hours when the client works. Staff add that clients say it is often impossible to get through to child support staff on the telephone

to reschedule, and few offices are open after-hours to accommodate employed clients who cannot take time off work. Some clients also suggest to staff that they have to arrange child care during these scheduled appointments, but all the offices we visited seemed to expect children to regularly accompany adults. Several child support offices we visited had play areas, toys, and books available for children while their parents met with staff.

Many Agency Staff Report That Some TANF Clients Have Strong Personal Incentives Not to Cooperate with Child Support Enforcement

As shown in Table 2, staff believe that many clients avoid cooperating with child support simply because they do not want the noncustodial parent to be involved with their children. Staff explain that perhaps a client has developed a relationship with another person, and believes that child support enforcement may strain that relationship. One worker describes the length to which some clients will go to keep noncustodial parents out of their lives, *"I had a lady name three wrong guys. She knew that they were not the father. She did 'cooperate', by giving names, but not the right one. She wasn't gaming the system. She didn't want it to be him. She named men that she might like to be the father first. We explained how genetic testing works, but she still tried."*

Table 2: Staff Perception of Reasons for TANF Client Noncooperation

Reason	Child Support Respondents	Public Assistance Respondents
Client does not want noncustodial parent in child's life	95 % (92 offices)	91 % (93 offices)
Client wants to protect noncustodial parent from obligation	94 % (91)	92 % (94)
Client fears loss of informal support	88 % (85)	88 % (90)
Client does not want to establish paternity	67 % (65)	37 % (38)
Client sees no benefit to cooperation	64 % (62)	39 % (40)
Client fears violence from noncustodial parent	63 % (61)	73 % (74)

Staff also explain that some mothers fear if paternity is established the father may seek custody of the child or try to change visitation arrangements, especially if he is paying child support. Clients may fear the noncustodial parent becoming involved in the child's life if the noncustodial parent is a substance abuser, is involved in criminal activity, or imprisoned. Some clients fear violence from the noncustodial parent, either directed at the child or themselves. In a companion report, we note that, while TANF clients may be exempted from cooperation requirements for good cause based on fear of physical harm from noncustodial parents, local offices in our focus States report granting very few good cause exceptions.[8]

Many Agency Staff Report That Some TANF Clients Have Strong Financial Incentives Not to Cooperate with Child Support Enforcement

Staff explain that many noncustodial parents provide informal financial support to their children, or in-kind support such as child care services, and may spend at least some time living in the client's home or visiting their children. If noncustodial parents are required to pay child support through the formal system, the family may actually be worse off because the noncustodial parent may cease informal or in-kind support. Additionally, clients know that many States will retain most or all formal child support as reimbursement for public assistance, rather than allowing the support to go to the family. Federal law allows States to pass-through to the family a portion or all child support collected, and disregard this amount when calculating the size of cash assistance grants. At least two States currently use this flexibility to forward all child support collections to public assistance families, yet most States pass-through only 50 - 100 dollars of monthly child support collections or have eliminated all pass-through provisions. All six focus States we studied pass-through and disregard 50 dollars of any current child support collected. Staff believe that, for clients who receive even modest informal support from noncustodial parents, meager pass-through provisions provide strong financial disincentives to cooperate. Clients may also have little confidence that States will collect support, especially from low-income or unemployed noncustodial parents. Even if no child support is collected, as staff report is often the case, the noncustodial parent may withhold informal or in-kind support if the client cooperates with authorities.

One caseworker describes what we heard repeatedly, *"I think the reason [TANF clients] don't want to cooperate is that those who do cooperate see no benefits coming from the [child support] office. It doesn't matter to the parent if [CSE] collects or not. The client will not get any money or support. [They] may be living with him, or getting support on the side. They don't want to cooperate, because it will only hurt their family. They don't want to have the State collect their children's support, because it will hurt their children. They will go from getting support to not getting support. There is a $50 disregard, but that is a cut for someone who's been getting any real support, and not enough to matter to the rest. Plus, only about 10 percent of my clients have any support being collected - maybe less. [There is] no incentive."*

STRATEGIES TO IMPROVE CLIENT COOPERATION

To surmount barriers and reduce disincentives to client cooperation, States employ various strategies, including improving staff skills to gain better cooperation, educating clients on the benefits of cooperation, improving procedures to ease cooperation, and imposing penalties to deter noncooperation.

Local Offices Encourage Cooperation by Enhancing Staff Interview Skills for Eliciting More Complete and Accurate Information and Improving Client Understanding of Benefits of Cooperating

Respondents from both agencies report making significant efforts to improve the interviewing skills of front line workers. Staff explain they have two basic goals to accomplish during interviews: to establish a positive relationship with clients; and to obtain as much information about noncustodial parents as possible. Workers report that interviewers can have a big impact on client attitude, a critical element in gaining cooperation. Staff appear to attempt to strike a balance in communicating with clients, encouraging strict compliance while remaining pleasant and respectful. Two workers explain how they handle interviews, *"The manner in which the parents are treated will often affect the amount of cooperation. The interviewer should be professional, courteous and firm with the client."* And, *"We try to make clients feel comfortable. We try to relate to them one-to-one. We try to make them feel empowered and a part of the system and explain to them why we have to do this. Sometimes they are scared or angry. Sometimes we have to insist, but most of the time we can take a friendly approach."*

After establishing a positive relationship, interviewers turn their attention to the information provided by clients. Staff report that most TANF clients provide all they know, yet some apparently withhold information or give false information. Again, staff describe their efforts, *"[You have to] hone your interviewing skills to elicit information. If she has a new pregnancy or baby, act interested. Say in a friendly way, "Were you living with the baby's father?" "How long were you dating?" "Did you tell him you were pregnant?" This will encourage her to confide in you. Gently tell the reasons for establishing paternity and obtaining support for their child."* To improve the quality of information, child support workers attempt to immediately verify information through various data sources such as State department of motor vehicle or employment databases. Access to these tools helps staff quickly identify false or outdated information and ask follow-up questions to uncover additional details.

Local Staff Encourage Cooperation by Educating TANF Clients about Cooperation Requirements and the Potential Benefits of Pursuing Child Support

Local child support and public assistance staff in focus States agree that educating clients regarding cooperation requirements, and on the benefits of cooperating, is one of the most effective ways they have to improve client cooperation with child support enforcement. Caseworkers are likely to address cooperation requirements during individual interviews, but report that clients may not always fully understand what is expected.[9] Staff also report this lack of understanding can create a barrier to client cooperation (Table 1). Caseworkers discuss the benefits of cooperating either in person during these same interviews, or in group orientation sessions. These group sessions are likely to be offered several times a month, as needed, and may include information on paternity establishment and support collections.

Staff report spending significant time explaining the long-term benefits of child support enforcement and discussing other reasons why TANF clients should cooperate. Caseworkers often describe child support as a possible source of income the client can access after their time-limited cash assistance runs out, or as a supplement to income from employment. When clients suggest the noncustodial parent is unemployed or has few resources to pursue, staff explain that those circumstances are likely to change as the noncustodial parent ages. Workers also explain that it is the responsibility of the noncustodial parent to support the children and that it is unfair for the client to shoulder this burden alone. If the noncustodial parent has children in another household, caseworkers emphasize that those other children may be getting support to the detriment of the client's child. If workers suspect the noncustodial parent is actually providing informal support to the family, staff often react as one worker describes, *"A lot of times the guy might be giving them money instead of paying child support, but I try to inform them that if they don't go through the courts, then that guy can disappear anytime, and without an order we can't do anything to help her."* Finally, in cases in which paternity has not been established, staff remind clients that children have the right to know their father, to have a relationship with him, to have access to medical history information, and to be a possible beneficiary of Social Security or other benefits.

Local Staff Encourage Cooperation by Reducing the Need for TANF Clients to Make Separate Appointments at the Child Support Enforcement Office

Failure to keep appointments is the most frequent reason clients are considered noncooperative with child support enforcement cooperation requirements in many offices. Child support workers describe the severity of this problem, *"No-shows at child support are the typical reason for noncooperation with child support."* And, *"We average only a 30 percent rate of appearance for first interviews."* To combat this problem, many offices avoid ever having clients come to the child support office. Offices use five strategies to accomplish this: relying on information gathered by public assistance staff; co-locating or out-stationing child support staff at public assistance offices; mailing documents to clients for completion and return; conducting telephone interviews; and conducting video conference interviews.

Information From Public Assistance Interviews

During typical application and re-determination interviews, public assistance caseworkers ask TANF clients to provide information about noncustodial parents. While child support workers are concerned about the completeness and accuracy of this information, it may still be sufficient for child support enforcement. Information can be sufficient especially when critical facts are obtained, such as the noncustodial parent's Social Security number, driver's license number, current address, or current employer. Some child support offices report they rely heavily on noncustodial parent information collected by public assistance workers, while others report that this information is merely a starting point for casework.[10]

Information From Co-located Child Support Staff

All six focus States use co-location or out-stationing of child support staff in at least some local public assistance offices. In one focus State, child support and public assistance workers are employees of the same agency and are co-located in every county of the State. In other focus States, child support workers are assigned to work at public assistance offices on regular or periodic schedules. Areas with larger caseloads tend to have full-time, out-stationed workers, while rural areas tend to send child support workers to public assistance offices less frequently. One worker describes, *"Once a month I visit each one of my four counties to talk to the people that for whatever reason cannot provide the information by mail or phone. So I go to one county this week, another one next week, etc. I schedule clients so I can handle them all in one day."*

Information Requested by Mail

Some local child support offices mail clients various documents in advance of, or in lieu of, personal interviews at agency offices. One office we visited primarily uses the mail to facilitate interaction with clients. Staff from this office report they often only need to personally interview about 5 percent of clients. As a caseworker describes, *"They don't come here very much. We send out the [questionnaire] and they complete it and send it back. Then we often make phone contact to fill in the incomplete information. The [questionnaire] is long and tedious. It also asks very personal questions and some people feel uncomfortable putting some of that on paper."*

Table 3 lists the items child support offices most frequently mail to TANF clients. In addition to allowing some clients to avoid coming to the child support office, staff report that clients who receive program information and checklists in advance are better prepared to cooperate if they eventually have a personal interview because they know what will be expected of them.

Table 3: Items Which Child Support Offices Mail to TANF Clients

Item	Percent of Respondents*
Questionnaire about Noncustodial Parents	60 % (52 offices)
Checklist of Noncustodial Parents Information Needed	60 % (52)
Information about the Consequences of Failure to Cooperate	56 % (49)
Information about Cooperation Requirements	46 % (40)
Child Support Application	34 % (30)
Voluntary Paternity Acknowledgment Form	21 % (18)

* Percent of child support respondents who report mailing documents to TANF clients from among the 87 offices that report mailing any documents to clients.

As mentioned above, staff report one serious concern regarding mailing documents to clients for completion and return. Clients often have difficulty accurately completing detailed documents and may be reluctant to write down confidential information. As explained by one worker, *"Our biggest problem or our biggest barrier is getting a form completed. It's a confidential information gathering letter that our attorneys have grown terribly attached to. They will not proceed without that form completed, signed and dated, with no discrepancies in it. If we cannot accomplish that by mail, then we have to sit down and have a staff member take [the client] through it."*

Information from Telephone Interviews

Many local child support offices interview clients by telephone, whether as the primary information collection method or as follow-up to previous contact. One State has a policy which requires child support workers to be available in person or by telephone to interview all new applicants for public assistance. Staff report that telephone interviews speed the enforcement process because it may be faster to contact parents by telephone than to arrange and wait for an in-person appointment.

While telephone interviewing can be an effective information gathering tool, staff report the method has three significant weaknesses. First, some clients do not have telephone service or may be difficult to reach by phone. Second, it may be difficult for some clients to reach caseworkers when returning calls due to inadequate agency phone systems. Staff report callers to child support offices may experience frequent busy signals and long waits on hold. Finally, caseworkers explain they like to see the client's face during interviews to help establish good rapport and to get signals about when to ask additional questions on particular topics. Telephone interviewing obviously deprives caseworkers of these 'visual' tools. To address one of these weaknesses, staff in several child support offices describe efforts to improve their procedures for handling phone calls, and customer service generally, *"We have a public service staff in our call center who pull up records to obtain the status of cases. We were one of the first counties to get this capability, but many other counties are beginning this practice. Phone calls were inundating staff, and they were not able to get work done. The operators are highly trained, and can answer most questions over the phone, almost like case managers. They can make referrals, and know local resources. The support officers will take the most complex calls, but usually the phone staff handle things."*

Information from Video Conference Interviews

One of the 24 local child support offices we visited is utilizing video conference technology to facilitate client interviews with child support workers. This office has clients spread over twelve mostly rural counties, each of which has a local public assistance office. Through video conferencing, clients who are already at the public assistance office for application or re-determination interviews may speak directly with child support workers seeking information about noncustodial parents. Although the

technology had only been used for two months at the time of our visit, staff report favorable first impressions and a few significant benefits. First, clients were spared from a trip to the child support office. Second, child support staff felt they obtained better information than they might have on the telephone. Caseworkers attribute these better results to clients feeling more comfortable because they can see the interviewer and because the client's public assistance worker, with whom many clients develop a close relationship, is also present for the video conference call. Additionally, interviewers can see clients, making it easier to pick up body language and other signals and ask more pointed and timely follow-up questions.

Local Staff Encourage Cooperation by Completing Multiple Tasks During Appointments at Child Support Offices and Assisting TANF Clients in Gathering Information about Noncustodial Parents

When clients *do* attend appointments at local child support offices, staff attempt to accomplish as much as possible, depending on the needs of the case. In addition to eliciting information about noncustodial parents, many offices also help clients voluntarily acknowledge paternity and may arrange for meetings between parents. For example, some local child support offices hold special "paternity" or "support" days in which staff meet with clients and putative fathers or noncustodial parents to seek agreement on terms for child support. Additionally, many local offices are equipped to collect genetic samples from clients, children, and putative fathers. Staff suggest that collecting genetic samples from clients who already have appointments at child support offices eases cooperation, because it avoids requiring clients to make a second trip to submit samples.

One of Our Study's Focus States Encourages Cooperation by Delaying TANF Benefits Until Child Support Staff Deems an Applicant Cooperative

Federal welfare reform legislation places the responsibility for determining whether a TANF client is cooperating with the child support enforcement agency. In many local areas of most focus States, child support staff do not have an opportunity to make this determination until after a new client is already receiving benefits, because the case is not referred to the child support agency until after the applicant is approved for assistance. In one focus State, however, individuals may not proceed with their application for cash assistance until they interview with child support staff and are determined to have initially cooperated. In this State, child support and public assistance workers are employees of the same agency and are co-located in every county of the State. TANF applicants who provide information about noncustodial parents and agree to cooperate in the future are given a certificate of cooperation to present to public assistance staff to demonstrate their cooperation with child support enforcement. One benefit of this pre-approval process is that child support staff may obtain and verify information sooner, and immediately begin working the case. Child support workers indicate that at the time of application clients often have the best information they will ever have about noncustodial parents.

Additionally, some workers suggest they have more leverage to gain cooperation when clients are still in need of benefits, than when clients are already receiving cash assistance. One worker notes, *"At the initial interview, they are wanting help so they are more likely to give information. At that time, [cooperating is] just one more thing and they wouldn't think about it."*

However, some child support staff argue that if pre-approval cooperation determinations require child support staff to interview all TANF applicants, this will unnecessarily waste staff time because some applicants will be denied assistance, and may never enter the child support caseload. They argue that the agency receives little gain from any time child support staff spend interviewing applicants who are subsequently denied benefits. Additionally, they argue that since public assistance workers do gain sufficient information in some cases, the best policy is to require an interview with child support workers only after an applicant is approved for benefits, and then only if additional information is required to pursue support. On the other hand, proponents of pre-approval by child support staff argue that if an applicant needs child support services, an initial child support interview is a proper agency function, regardless of whether the family is eventually approved for TANF.

IMPOSING PENALTIES FOR NONCOOPERATION

In lieu of, or in addition to, the strategies discussed above, States also encourage cooperation by penalizing TANF clients who fail to cooperate. Cash penalties for noncooperation with child support enforcement in our six focus States range from the Federally-mandated 25 percent reduction in the family's cash assistance, to a "full-family" penalty which eliminates all cash assistance to the family of a TANF client who fails to cooperate.[11] Staff indicate that the ultimate effectiveness of penalties as a strategy to improve cooperation appears to rely upon three factors: whether clients *believe* that penalties will be imposed; whether penalties are *actually* imposed; and the *size* of penalties relative to the total public assistance a client receives.

Many Agency Staff Believe the Threat of Penalties Influences TANF Clients to Cooperate, While a Few Believe Threats Exert Only a Limited Influence

As shown in Table 4, 54 percent of public assistance and 42 percent of child support staff feel that the *threat* of penalties for noncooperation strongly influences TANF clients to cooperate with child support enforcement. Only 9 percent of public assistance and 21 percent of child support respondents believe the threat of penalties has weak or no influence on client cooperation. These perceptions are consistent with the evidence that most TANF clients and applicants cooperate as required, without having penalties actually imposed.

Table 4: Staff Perception of How Threat of Penalties Influences TANF Client Cooperation		
Level of Influence	**Child Support Respondents**	**Public Assistance Respondents**
Very Strong Influence	15 % (15 offices)	17 % (17 offices)
Strong Influence	27 % (27)	37 % (38)
Moderate Influence	37 % (37)	37 % (37)
Weak Influence	19 % (19)	9 % (9)
No Influence	2 % (2)	0 % (0)

Our research suggests two possible explanations for why the threat of penalties may have limited influence on some clients. First, it appears possible that the threat of penalties has less influence on TANF clients who receive lower benefits than those receiving higher benefits. Eighty percent of the 30 respondents expressing a belief that the threat of penalties has only weak or no influence on client cooperation work at local offices in the three focus States having the lowest cash benefit levels. Second, respondents suggest that some clients doubt that threatened penalties will actually be imposed and, therefore, may not respond to threats.

Nearly all Public Assistance Staff Report Most TANF Clients Who Are Penalized Eventually Cooperate, Regardless of the Type of Penalty

As shown in Table 5, 90 percent of local public assistance offices report that TANF clients who have been penalized for noncooperation with child support enforcement eventually cooperate most of the time or frequently. The remaining 10 percent of respondents report that clients only sometimes or rarely cooperate after being penalized. As one worker states, *"They will usually have excuses for missed appointments. Once they are actually sanctioned, cooperation follows."*

We examined local office responses regarding whether penalized clients eventually cooperate by State characteristics, to examine if stiffer (full-family) penalties are seen as having greater influence on clients than lesser (partial) penalties. Our small, purposive sample did not yield data to definitively determine which type of penalties have the most impact on clients. Nevertheless, we can offer several observations based on staff responses.

First, staff of both agencies report that TANF clients are most likely to act in response to the *first* cash penalty, whether that involves a full or partial reduction in benefits. Staff suggest that States which impose stiffer penalties after some period of time are unlikely to influence clients to cooperate much beyond the effect of the initial penalty. One worker explains, *"It depends on the client. We only hear from a percentage of the women we sanction. The others are not going to cooperate with us no matter what. They will take*

the grant money as long as possible, and not get assistance once we cut them off. Closing the case does not do the trick. She will cooperate when we first reduce the check, or else she is not going to cooperate at all."

Table 5: Local Public Assistance Staff Perceptions of Client Cooperation After Being Penalized

States by type of penalties and cash benefits levels	Frequency of TANF Client Cooperation	
	Most of the Time or Frequently	Sometimes or Rarely
All Focus States	90 % (87 offices)	10 % (10 offices)
States with Immediate Full-family Penalties	85 % (29)	15 % (5)
States with Initial Partial Penalties	92 % (58)	8 % (5)
States with High Benefits	97 % (35)	3 % (1)
States with Low Benefits	76 % (13)	24 % (4)

Second, as shown in Table 5, a higher percentage of respondents from focus States which initially impose only partial cash penalties (92 percent) report that most TANF clients eventually cooperate, compared to respondents from focus States with full-family penalties (85 percent). Surprisingly, based on public assistance staff responses, partial penalties appear to have at least as much influence on client cooperation as full-family penalties.

Third, among focus States which initially impose partial penalties, staff from States with relatively high cash benefits perceive penalties as having greater influence (97 percent) than do staff from low cash benefits States (76 percent). One apparent explanation is that TANF clients in States with low cash benefits tend to receive higher food stamp benefits, and therefore, may not miss the small cash reduction caused by a partial penalty.

Finally, staff suggest that access to public assistance other than cash benefits may affect how much influence penalties have on client cooperation. One worker explains, *"Some clients have their needs removed and just go on with TANF at a lower benefit. All we can do is cut $75 - $80 off their grant. They still get their housing, their WIC, their Medicaid, and food stamps. So the sanction is not effective to get them to cooperate."*

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:

Reassess Policies Requiring Redundant Client Visits to Child Support Offices When Sufficient Information about Noncustodial Parents Has Already Been Gathered

Most States we studied attempt to avoid having TANF clients visit child support offices unless absolutely necessary. However, one of our focus States' computer system automatically schedules all new TANF clients for appointments at their local child support office. State policies which require all clients to appear at child support offices, even when the client has previously provided sufficient information for child support enforcement, are counterproductive because they frustrate both staff and clients, and may delay enforcement. As ACF and States work to improve the quality of information gathered during initial interviews at public assistance offices, they should discourage policies which require redundant efforts.

Evaluate Policies That May Create Disincentives for Client Cooperation

Staff suggest that cooperation with child support enforcement may actually make some TANF families worse off financially because noncustodial parents may stop providing informal or in-kind support to clients who provide information to the State. Additionally, many clients appear to have little faith that collections will occur, and know that many States retain most or all child support collected on behalf of families receiving TANF cash assistance. Considering that welfare reform empowered States with broad flexibility to implement policies to assist needy families, ACF should encourage States to evaluate whether their current pass-through policies and treatment of in-kind support are counter-productive to long-term goals of helping clients attain independence and self-sufficiency.

Train Front Line Staff in Skills Designed to Encourage Client Cooperation

Some TANF clients do not fully understand cooperation requirements or the benefits of cooperating with paternity establishment efforts and child support enforcement. Staff suggest that educating clients improves their cooperation. ACF should assist State agencies in providing local office staff training needed to insure they educate clients on what is required and how they might benefit.

Use Innovative Strategies to Make it Easier for TANF Clients to Cooperate With Child Support Enforcement

Some States have changed their procedures to make it easier for clients to cooperate. For instance, some areas avoid having clients come to local child support offices through methods such as mailing requests for information to clients, video conferencing, and out-stationing child support staff at public assistance offices. When appointments at child support offices *do* occur, local offices may attempt to complete multiple tasks, including signing voluntary paternity acknowledgment forms and collecting genetic testing samples. ACF should encourage appropriate State use of these and other strategies for enhancing client cooperation.

Evaluate the Advantages and Disadvantages of Delaying Cash Assistance Until Child Support Staff Determine an Applicant Has Initially Cooperated

While States must require client cooperation with child support enforcement as a criterion for participation in the TANF program, one focus State will not approve new applicants for benefits until the child support agency certifies that the client has at least initially cooperated. Staff suggest that such a policy improves client cooperation because individuals are often more willing and able to provide useful information about noncustodial parents at the early stages of the application process. ACF should encourage States to evaluate whether adoption of such a policy could improve cooperation in States that do not currently require such pre-approval determinations by child support staff. Of course, States should continue to assure that emergency assistance is readily available for applicants in dire need.

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. Fifty-five percent of child support offices report that custodial parents provide enough information about noncustodial parents to successfully pursue child support enforcement often or very often. Another 35 percent report that clients provide this level of information about half the time, and only 10 percent indicate clients do so less than half the time.

6. Eighty-nine percent of child support and 90 percent of public assistance respondents report that it is at least somewhat easy for clients to meet cooperation requirements. About three-quarters of these respondents from each agency said cooperating was easy or very easy for clients.

7. See our report, Paternity Establishment: States Use of Genetic Testing, OEI 06-98-00054, September, 1999.

8. *Ibid*., OEI 06-98-00043, 2000.

9. For further information regarding client understanding of cooperation requirements, see our companion report, Client Cooperation With Child Support Enforcement: Policies and Practices, OEI 06-98-00040, 2000.

10. See our companion reports, *ibid*, OEI 06-98-00040, and Client Cooperation With Child Support Enforcement: The Role of Public Assistance Agencies, OEI 06-98-00042, 2000.

11. *Ibid*., OEI 06-98-00040, 2000.