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**Making Child Support
Safe: Coordinating Child
Support and Public
Assistance Agencies in
Their Response to
Domestic Violence**

Final Report

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**MAKING CHILD SUPPORT SAFE:
COORDINATING CHILD SUPPORT AND PUBLIC ASSISTANCE AGENCIES
IN THEIR RESPONSE TO DOMESTIC VIOLENCE**

EXECUTIVE SUMMARY

Among its major policy provisions, recent federal welfare reform legislation sought to strengthen enforcement of child support for TANF recipients while concurrently helping to protect women who are victims of domestic violence. The Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996 expands penalties for noncustodial parents who fail to pay support and for custodial parents who, without "good cause," do not cooperate with the child support enforcement process. In addition, recognizing that domestic violence victims may not be able to comply with the new legislation's cooperation requirements, PRWORA includes two provisions that, under certain circumstances, exempt victims of domestic violence from requirements for cooperating with enforcement: the IV-D good cause policy and the Family Violence Option (FVO).

Though the IV-D good cause policy existed prior to PRWORA, revisions made it a far more flexible policy. States can now determine how to define good cause, set standards of evidence for good cause, and decide whether public assistance or child support agencies will determine whether good cause exists. The FVO offers states the new option of identifying victims of domestic violence, referring them to community services, and waiving the requirement that they cooperate with child support enforcement and other aspects of Temporary Assistance for Needy Families (TANF).

This new state latitude and the federal lifetime limit on cash assistance provide agencies with the opportunity to address the needs and concerns of domestic violence victims, but also make it urgent that they do so. Under the five-year lifetime limit of support, recipients of public assistance face a greater need for expediency in their efforts to achieve self-sufficiency, of which financial stability is a key piece. Most women who are victims of domestic violence want to pursue child support. Cooperation with child support requirements, however, can increase the risk of harm for the victim of domestic violence by alerting her abuser to her location; allowing for physical contact during courtroom proceedings; and/or angering an abuser by automatic procedures such as wage withholding or a driver's license suspension. If women who fear their abusers choose not to pursue child support, on the other hand, they impair their ability to become self-sufficient through the loss of resources for themselves and their children. For the majority of domestic violence victims who want this financial support, efforts to protect their safety throughout the collection process become extremely important.

The coordination of safety and child support receipt can be further complicated by the specifics of the family situation. The abusing partner or former partner may be the parent of all, some or none of the children for whom child support is being sought. There may also be more than one former partner with a history of abusive behavior. The collection of child support could illicit an abusive response by a child's father, but it could also illicit an abusive response by a jealous current partner who is threatened by the financial independence child support (or

employment) could provide. Systems must be developed that can take into account the specifics of each family in determining the best strategy for assuring both safety and child support.

The current legislation's dual emphasis on what can be competing objectives of child support enforcement and protection of victims of domestic violence has intensified the need for states to develop a response system. The response system needed would improve the coordination of information and delivery of services between public assistance and child support agencies. This need is particularly acute for victims of domestic violence who seek to collect the financial resources from child support payments.

Mathematica Policy Research, Inc. (MPR), in collaboration with the Urban Institute, has examined what local communities in Massachusetts, Minnesota, Missouri, and Oregon have done to improve the coordination of this response system. This report, funded by the Office of Child Support Enforcement (OCSE) of the U.S. Department of Health and Human Services, focuses specifically on the strategies that the child support and public assistance agencies in these sites have taken to improve the interagency coordination of information and services for victims of domestic violence with regard to the child support collection process, both for domestic violence victims who want exemption from this process and those who want to collect child support safely. Sometimes this coordination of effort extends to others, such as court personnel or staff from local domestic violence service organizations. The study's primary goal is to offer guidance for policymakers and agency staff in other states as they design and implement interagency strategies to help victims pursue child support safely. Given its focused purpose, the study does not attempt to present a comprehensive analysis of child support enforcement policies, domestic violence issues, or the outcomes that resulted from the initiatives in our study sites.

STUDY DESIGN

The study focused on communities in four states that have taken somewhat different approaches to providing services for domestic violence victims in the child support system. We studied IV-A (TANF) and IV-D (child support) agencies in Boston, Massachusetts; Hennepin County, Minnesota; Jackson County, Missouri; and Grants Pass-Josephine County and Medford-Jackson County, Oregon. Massachusetts, Minnesota, and Missouri are conducting pilot projects in those locations supported by Section 1115 funding from OCSE. Minnesota is implementing new FVO and IV-D good cause procedures for its pilot project in one county. Massachusetts and Missouri are implementing procedures for their pilots in one local jurisdiction, then spreading some of them statewide. Oregon is implementing new procedures statewide.

The study is based on information gathered from a variety of data sources. Project staff reviewed materials provided by the Office of Child Support Enforcement on the state demonstration projects and the family violence option. Staff also obtained documents from the state and project sites about their grant activities and the implementation of the family violence option. Documents reviewed included training materials, policy guidelines and procedural manuals. Staff verified their understanding of project activities with appropriate state and local county staff and where necessary asked state and site specific open-ended follow-up questions on such topics as the identification and assessment of domestic violence victims, referrals to

community services, waivers to exempt clients from child support cooperation requirements, and safe pursuit of child support. Discussions were held with policy analysts from state child support and public assistance agencies; administrators, supervisors and line staff from local-level child support and public assistance agencies; and representatives from statewide domestic violence advocacy groups and local domestic service providers. Descriptions of state-wide and demonstration specific activities were sent back to each state/site to ensure that information was accurate and complete.

FINDINGS

The four sites in our study are implementing strategies to strengthen coordination among IV-A and IV-D agencies to serve victims better. The following findings on interagency coordination emerged from our examination of the sites' efforts:

Tapping the expertise of specialized staff can help address domestic violence concerns.

In response to the expanded roles and responsibilities for staff under PRWORA, IV-A and IV-D agencies increasingly need staff with special skills or training. The FVO requires that a person trained in domestic violence conduct needs assessments and develop safety plans for victims. However, performing this work requires a level of skill and sensitivity to domestic violence beyond what most caseworker training is designed to develop.

To comply with FVO provisions, the IV-A agencies in the study sites variously used three types of specialized staff to assist domestic violence victims. Specialized IV-A caseworkers who developed some expertise on domestic violence were able to devote the time needed to coordinating service delivery for victims. IV-D staff stationed at welfare agencies could help all public assistance recipients and provide special assistance to recipients with domestic violence issues by helping them pursue child support safely. External domestic violence experts from community agencies were located at IV-A agencies to offer caseworkers and clients access to their special training and expertise in domestic violence issues.

To ensure that host staff and clients benefit from the expertise of specialized staff, IV-A and IV-D agencies need to develop clear roles and responsibilities for them. The IV-A agencies we examined are considering two strategies to increase specialized staff's integration into their host agency's offices:

- ***Developing Partnership Agreements.*** Some IV-A agencies are considering developing partnership agreements with community service providers before domestic violence counselors are out-stationed. The agreements would describe in detail the process for the agencies' interaction, including the roles and responsibilities of counselors and the steps to take when procedural or supervisory issues arise.

- ***Formalizing Interaction in Agency Processes.*** Other agencies are attempting to establish an effective working relationship between domestic violence counselors and IV-A caseworkers by formally including counselors in agency processes. They require domestic violence counselors to sign all good cause waiver requests or safety plans to ensure that IV-A caseworkers share information with them.

Supporting local cross-training efforts can deepen understanding among agencies.

IV-A and IV-D staff receive training on their own agency's procedures but may not know how other agencies work. This lack of understanding may reduce the effectiveness of interagency coordination and detract from an agency's ability to deal with the special problems faced by domestic violence victims in the child support process.

Cross-training is one approach that study sites have used to increase IV-A agencies', IV-D agencies', and community-based domestic violence service providers' knowledge of each other. Agencies offer formal presentations of policies and procedures or information on the dynamics of domestic violence. The sessions sometimes train staff from more than one agency and sometimes feature training by the staff of one agency for the staff of another. The study sites have also taken several other, more informal approaches to cross-training. Strategies include the following:

- ***"Brown Bag" Discussions and Agency Tours.*** A domestic violence service provider in Missouri hosts lunchtime discussions and agency tours for local IV-A agency staff to inform them about service provision in their community.
- ***"Buddy Visits" to Other Agencies.*** Some IV-A and IV-D agencies in Minnesota pair one worker from each agency and encourage them to visit each other's workplace to establish contacts with staff at partner organizations and learn about their responsibilities.
- ***Presentations at All-Staff Meetings.*** IV-A agencies invite representatives of IV-D agencies to all-staff meetings (or vice versa) to discuss their approach to service provision or introduce their agency's most recent procedural changes.

Cross-training provides several benefits, including learning firsthand about the policies and procedures of other agencies and organizations; understanding better the rationale behind approaches to case handling; and building partnerships that provide comprehensive services and support for clients.

Tying information systems together can help protect client safety.

To serve clients effectively, IV-A and IV-D caseworkers must be aware of each other's actions, especially when the client is a domestic violence victim. For example, if a IV-A

caseworker does not promptly inform a IV-D worker that a client received a good cause exemption and that her child support case should be closed, the IV-D worker will continue to take action on the case. In extreme situations, breakdown in communication between IV-A and IV-D staff can result in inadvertent “leaks” of personal information on domestic violence victims to their batterers.

In response to these concerns, several of the study sites have taken steps to improve interagency communication links using information systems. Strategies include the following:

- ***Establishing Shared Computer Screens and Common Codes.*** Creating screens that can be viewed by workers at IV-D and IV-A agencies expedites the transmittal of information. To help staff interpret these screens, some agencies are developing common codes for classifying a case’s status.
- ***Maintaining Case Notes Electronically.*** Recording all case notes in automated information systems rather than on paper helps to document case activity thoroughly and facilitates rapid sharing of case notes among public assistance and child support workers.
- ***Developing a System of Immediate Messaging.*** This is a computer-based approach that notifies a worker that a case needs special handling. If workers activate the alert option on their computer, messages are received immediately and automatically appear on their screens.
- ***Allowing for Manual Disabling of Automatic Computer-Based Child Support Enforcement Procedures.*** This approach allows child support staff to manually shut off certain collection procedures for domestic violence victims who want to safely pursue child support. Such special precautions may be needed in order to avoid further abuse.

Ensuring broad local participation strengthens planning for policy and procedures.

Committees that plan for policy usually include representatives of state-level agencies but may not include representatives from local-level agencies. As a result, state policy may not always address local-level concerns. Therefore, it is important to include a local perspective in planning for policy, so that operational concerns can be addressed.

In response to this issue, study sites have sought to include staff from local IV-A and IV-D agencies in policy planning. Local staff participate directly in committees for policy and procedural development or they review policies once they have been drafted. The involvement of these staff can generate practical suggestions on how procedures can be implemented more smoothly. For instance, local staff can make sure procedural language is intelligible to other local staff and alert policymakers to staffing issues or other potential implementation challenges.

In addition, some study sites have included representatives from local domestic violence service providers in planning for policy on domestic violence. These representatives can make important contributions because of their vast knowledge of domestic violence issues and of the local communities in which they are located. Although many domestic violence service providers want to participate in state planning efforts, some, especially those from smaller organizations, lack the funding to do so. Offering the modest funding needed to enable providers to participate promotes fuller collaboration.

I. INTRODUCTION

Collecting child support for TANF recipients is a complicated process, particularly for custodial parents who are victims of domestic violence. Multiple agencies, including child support and public assistance agencies, are responsible for gaining clients' cooperation, collecting information to locate noncustodial parents, establishing paternity, creating a child support order, and enforcing that order. Differing agency goals and responsibilities can make it difficult for them to coordinate their efforts in ways that ensure that the interests of the parents and children are best served. Because of the legislation's increased emphasis on employment, public assistance agencies are now focusing more on helping clients find jobs, which may include greater efforts to identify work barriers such as domestic violence, refer clients to supportive services, and monitor compliance with participation requirements. Child support agencies, on the other hand, are concerned with establishing paternity and child support orders, as well as enforcing legal obligations.

Collecting child support for victims of domestic violence, however, presents special concerns that are often heightened if interagency coordination is weak. These concerns stem in part from the inherent conflict that can arise between the need for financial support from child support payments and the need for safety from abuse. Unless she chooses to forego the child support payment because the risk of abuse is too great to warrant its pursuit, women who are victims of domestic violence must comply with the requirements for cooperation with the child support enforcement process.¹ These very requirements, however, can increase the risk of harm

¹In this paper, we refer to victims of domestic violence as women and batterers as men, since 85 percent of victims in the United States are women, and men are responsible for the great majority of attacks (U.S. Department of Justice 1998). However, in some instances, perpetrators of violence are female and victims male.

for the victim of domestic violence by alerting her abuser to her location; bringing the victim and abuser into near proximity during courtroom proceedings; and/or angering an abuser by automatic procedures such as wage withholding or a driver's license suspension. If women who fear their abusers choose not to pursue child support, on the other hand, they impair their ability to become self-sufficient through the loss of resources for themselves and their children. Most victims of domestic violence do not want to forego these resources, and yet want to ensure their own safety and that of their children.

The coordination of safety and child support receipt can be further complicated by the specifics of the family situation. The abusing partner or former partner may be the parent of all, some or none of the children for whom child support is being sought. There may also be more than one former partner with a history of abusive behavior. The collection of child support could illicit an abusive response by a child's father, but it could also illicit an abusive response by a jealous current partner who is threatened by the financial independence child support (or employment) could provide. Systems must be developed that can take into account the specifics of each family in determining the best strategy for assuring both safety and child support.

Among its major policy provisions, recent federal welfare reform legislation sought to strengthen enforcement of child support for TANF recipients while concurrently helping to protect women who are victims of domestic violence.² The Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996 expands penalties for noncustodial parents who fail to pay support and for custodial parents who, without "good cause," do not cooperate

²The major policy provisions of PRWORA changed the fundamental structure of welfare, eliminating the entitlement nature of cash assistance, requiring greater levels of work activity, establishing lifetime limits on receipt of assistance, imposing performance standards on states, and providing states with greater latitude in policy development.

with the child support enforcement process.³ In addition, recognizing that domestic violence victims may not be able to comply with the new legislation's cooperation requirements, PRWORA includes two provisions that, under certain circumstances, exempt victims of domestic violence from requirements for cooperating with enforcement: the IV-D good cause policy and the Family Violence Option (FVO).⁴

The current legislation's dual emphasis on two tenuously linked objectives—child support enforcement and protection of victims of domestic violence—has intensified the need for states to develop a response system that improves the coordination of information and delivery of services among public assistance and child support agencies. This need is particularly acute for victims of domestic violence who seek to collect the financial resources from child support payments. PRWORA takes an important step by establishing provisions to ensure the safety of domestic violence victims who want *exemption* from child support cooperation requirements. However, it leaves largely undefined the policies and procedures that local offices should follow to protect the safety of the majority of domestic violence victims who want to pursue child support payments. In the absence of such guidance, there is greater likelihood that the exchange of information and services between public assistance and child support agencies is not well coordinated. For victims of domestic violence, this lack of coordination poses enormous risk to their safety, the safety of their children, and their chances for becoming self-sufficient.

Mathematica Policy Research, Inc. (MPR), in collaboration with the Urban Institute, have examined what selected local communities in Massachusetts, Minnesota, Missouri, and Oregon

³P.L. 104-193, Sec. 103; 333; 367-70.

⁴IV-D good cause policy is contained in Title IV-D of the Social Security Act: 42 U.S.C. 654(29). The FVO is contained in Section 402(a)(7) of the Social Security Act.

have done to improve the coordination of this response system. Through grant support from the Office of Child Support Enforcement (OCSE) of the U.S. Department of Health and Human Services, these agencies are experimenting with child support and domestic violence policies and procedures in order to meet both the safety and self-sufficiency needs of TANF clients.⁵

In 1997, OCSE offered funding under Section 1115 of the Social Security Act to states for the development of child support enforcement policies and procedures to address domestic violence concerns and other reasons for non-cooperation. Three states who were awarded these grants in October of 1997 – Massachusetts, Minnesota, and Missouri – designed three-year projects to (1) collect information on the incidence of noncooperation, good cause exemptions, and domestic violence claims in the child support process; and (2) test approaches to identifying, referring, and pursuing child support payments on behalf of potential or actual victims of domestic violence. The states were required to implement their demonstration projects and to conduct evaluations of them. The Center for Policy Research in Denver, Colorado is currently evaluating the demonstrations for Massachusetts and Minnesota, and the University of Missouri in Columbia is evaluating that state’s demonstration. These state-funded evaluations will examine issues such as reasons for non-cooperation with the child support requirements; screening for barriers to cooperation; disclosure rates of domestic violence and factors associated with differences in these rates; client understanding of good cause exemptions; rates of interest in waivers and good cause; and the types of assistance requested by clients. This report does not focus on the issues addressed as part of the separate state evaluations.

Our report, funded by OCSE, focuses specifically on the strategies that the child support and public assistance agencies in selected sites have taken to improve the interagency coordination of

⁵Oregon was not a recipient of Section 1115 grant support from OCSE.

information and services for victims of domestic violence with regard to the child support collection process. This includes both domestic violence victims who want an exemption from the mandatory child support collection process and those who want to collect child support, if it can be done safely. The report looks across the four selected sites to assess what agencies are doing to address the growing need for interagency coordination as they are pushed by new federal policies to extend their traditional boundaries and partners. Sometimes this coordination of effort extends to others, such as court personnel or staff from local domestic violence service organizations. Issues related to the intersection between agencies are critically important to examine but often are superseded by those that focus within a single agency. As such, this report constitutes an important complement to the evaluation research noted above.

Each of the states in this study has adopted the FVO. In accordance with the latitude granted under PRWORA, each has also adopted its own set of policies and procedures in areas such as how to inform women about the good cause exemption, what constitutes cooperation with the child support requirements, responsibility for the “good cause” determination, and the process to be followed for an exemption claim. In the absence of effective interagency coordination, however, gaps can exist in these procedures—in knowledge, in communication, and in concern for safety, presenting dangers for victims of domestic violence. Our focus, therefore, is on what these sites have done to improve this interagency coordination while maintaining the dual objectives of child support enforcement and protection of victims of domestic violence.

A. POLICY CONTEXT

Domestic violence, broadly defined, is abusive or aggressive behavior by a person in an intimate relationship with the victim. The abuse can take physical, sexual, and/or emotional forms. The abuser may not be a current partner and the abuse itself may not be currently

inflicted yet may still constitute a threat or concern related to child support cooperation. Because of variations in the definitions of domestic violence and the wording of survey questions used to measure its prevalence, estimates of domestic violence for welfare recipients span a wide range, from 15 to 65 percent (Johnson and Meckstroth 1998).

Recipients of public assistance are more likely to suffer from domestic violence than are nonrecipients, and the repercussions from abuse can be extensive. Victims of domestic violence cycle on and off public assistance more frequently than other recipients, are far more likely to have their work compromised by absenteeism and tardiness related to their abuse, are significantly more likely to be unemployed at some point than nonvictims, and have lower personal incomes (Lloyd 1997).

Despite—or perhaps because of—the repercussions of abuse, most women who are victims of domestic violence want to pursue child support. The percentages of domestic violence victims wanting to pursue child support, from data collected in three states (two of which—Massachusetts and Minnesota—are included in this study), range from 50 percent, for those victims who said their abuser still posed a threat of harm, to 93 percent (Griswold, Pearson, and Thoennes 2000). Because most women who disclose domestic violence want to pursue child support and turn down the option of seeking an exemption from cooperation requirements, efforts to protect their safety throughout the child support collection process are extremely important.

Preexisting policy before PRWORA did little to address the often competing goals of child support collection and personal safety. In the past, victims of domestic violence were offered two options: “to forgo child support altogether or to enter the general caseload,” often referred to as the “red light” and “green light” responses to child support enforcement. Missing was the “yellow light” option which would allow for the identification of victims of domestic violence

whose pursuit of child support is then carried out with procedures designed specifically to protect their safety (Turetsky and Notar 1999). Under the AFDC program, states were required to give welfare applicants a good cause written notice which advised them, often in legal terms, of the child support cooperation requirement, their right to claim a good cause exemption from cooperation, and the need to provide evidence to support this claim. Preexisting policy defined good cause to include cases with adoptions pending, cases with children who were conceived through incest or rape, and cases with victims of domestic violence. A “good cause” claim, however, was restrictive and required evidence of anticipated physical or emotional harm to a child or to the custodial parent if the harm to the parent was “of such nature or degree that it reduces the person’s capacity to care for the child adequately,” often a difficult claim to substantiate (Turetsky and Notar 1999, pg. 11). If granted, these exemptions were typically for an indefinite time period, and did not specify a periodic review of possibly important changes in client circumstances.

PRWORA altered much of the previous legislation, including major provisions to enhance the child support enforcement process. The legislation adds state enforcement tools for collecting support from noncustodial parents, such as seizure of assets, license revocation, and reporting of new hires. As such, more noncustodial parents than previously—including those who are past or present abusers—will be brought into the child support system. At the same time, however, PRWORA’s provisions also increase the penalties for women who do not show good cause for failing to cooperate with child support enforcement requirements, by requiring states to reduce cash assistance for the entire family by at least 25 percent. These concurrent changes constitute a potentially dangerous combination for a woman who is a victim of domestic

violence. In tandem, they may increase the likelihood that she may come in contact with her abuser, making development and provision of a “yellow light” option so important.⁶

For domestic violence victims seeking an exemption from normal requirements to cooperate with child support enforcement efforts, federal welfare reform legislation also includes two provisions. First, PRWORA amended existing provisions on good cause waivers in Title IV-D of the Social Security Act, giving states more latitude. States can now determine how to define good cause, set standards of evidence for good cause, and decide whether public assistance or child support agencies will determine whether good cause exists. Second, the legislation introduced the FVO in Title IV-A of the Social Security Act. The FVO offers states the new option of identifying victims of domestic violence, referring them to community services, and waiving the requirement that they cooperate with child support enforcement and other aspects of TANF. For example, states can waive TANF work activity participation requirements, time limits on benefits, residency requirements, and family cap provisions. States can keep the IV-D good cause waiver and the FVO exemption processes separate, thus creating dual standards for exemptions from child support cooperation, or they can integrate the two. Those states that do not integrate these good cause standards, however, risk creating confusion for both clients and staff, duplicating efforts, and issuing inconsistent good cause determinations (Turetsky and Notar 1999).

This new state latitude, coupled with the federal lifetime limit on cash assistance, give agencies the opportunity to address the needs and concerns of domestic violence victims, and make it urgent that they do so. Under the five-year lifetime limit of support, recipients of public

⁶Prior to PRWORA, noncooperation of a parent did not reduce the cash assistance of children who were part of the case. Only the parents’ share of the grant could be removed due to noncompliance with the child support system.

assistance face a greater need for expediency in their efforts to achieve self-sufficiency, of which financial stability is a key piece. For a victim of domestic violence, obtaining child support may be the linchpin in allowing her to sever dependence on her abuser. Though the financial effect while on TANF may be small, child support payments can constitute an important supplement to total income once employed and off TANF. As noted earlier, most domestic violence victims want the financial assistance that comes from collection of child support.

There are a number of issues in the demonstration sites that could be examined, many of which are being carefully assessed by the local evaluations underway and mentioned above. Our focus here is on sites' efforts to create a coordinated interagency response to domestic violence victims' safe pursuit—or exemption from the requirements—of child support. Key provisions of PRWORA's FVO and the IV-D good cause exemption suggest the need for agencies to expand their roles and reach across traditional agency boundaries in order to develop the type of coordination needed to meet the legislation's objectives:

- A person trained in domestic violence must conduct individualized client assessments.
- A waiver from TANF requirements must be accompanied by a service plan, developed by someone trained in domestic violence, that reflects the individualized assessment.
- States can decide if a public assistance or child support agency will determine good cause for waivers from child support enforcement requirements.
- For those custodial parents subject to cooperation requirements, judgments about their level of cooperation have to be made by the child support agency. If agency staff determine that someone is not cooperating in good faith and therefore is not eligible for a good cause waiver, they must inform the public assistance agency, which is required to sanction clients for noncooperation.

Implementation of such efforts heightens the importance of, and benefits from, coordination between service agencies. The four sites we examine here have experimented with new procedures that entail closer cross-agency coordination than has generally been the rule. For this

reason, their efforts are noteworthy and can inform other states and localities of ways to improve the response to TANF clients' dual need for child support and safety.

B. ASSESSING COORDINATION IN CHILD SUPPORT AND DOMESTIC VIOLENCE STRATEGIES

For this study, we examined public assistance and child support agencies in local communities of four states implementing the FVO and IV-D good cause policies:

- Massachusetts (Boston area Department of Transitional Assistance and Department of Revenue offices);
- Minnesota (Hennepin County Family Assistance Division and Collection Services Division offices, some of which are in the city of Minneapolis);
- Missouri (Jackson County Division of Family Services and Division of Child Support Enforcement offices, some of which are in Kansas City); and
- Oregon (Grants Pass-Josephine County and Medford-Jackson County Adult and Family Services and Division of Child Support offices).

The four states' efforts to coordinate services for victims of domestic violence in the child support system are being carried out in varied settings and systems. Massachusetts, Minnesota, and Missouri are conducting pilot projects supported by Section 1115 funding from OCSE. Minnesota is implementing new FVO and IV-D good cause procedures for its pilot project in one county, and Massachusetts and Missouri are implementing new procedures for their pilots in one local jurisdiction and then are spreading some of them statewide. Oregon is implementing new procedures statewide.

The study is based on information gathered from a variety of data sources. Project staff reviewed materials provided by the Office of Child Support Enforcement on the state demonstration projects and the family violence option. Staff also obtained documents from the state and project sites about their grant activities and the implementation of the family violence option. Documents reviewed included training materials, policy guidelines and procedural

manuals. Staff verified their understanding of project activities with appropriate state and local county staff and where necessary asked state and site specific open-ended follow-up questions on such topics as the identification and assessment of domestic violence victims, referrals to community services, waivers to exempt clients from child support cooperation requirements, and safe pursuit of child support. Discussions were held with policy analysts from state child support and public assistance agencies; administrators, supervisors and line staff from local-level child support and public assistance agencies; and representatives from statewide domestic violence advocacy groups and local domestic service providers. Descriptions of state-wide and demonstration specific activities were sent back to each state/site to ensure that information was accurate and complete.

The report discusses three broad areas in which these agencies have coordinated efforts: in their internal procedures; through the use of specialized staff; and by promoting interagency understanding of one another. What follows is a brief overview, in Chapter II, of child support and domestic violence procedures implemented in local communities or statewide in our four focal states. The profiles in Chapter II are supplemented by summaries in Appendix A, which describe in more detail statewide domestic violence and child support policies in the focal states and note where these policies differ from initiatives in selected local communities. Both the profiles and appendix summaries were reviewed and approved by staff in each site. The report in chapters III through V then explores in greater detail the approaches that these sites are taking to pursuing child support while protecting the safety of domestic violence victims. We focus on those approaches that entail effort to coordinate agencies' activities in some way in their respective efforts to meet clients' needs. Specifically, Chapter III examines internal agency procedures that have been refined to develop a more coordinated flow of information in order to protect the safety of domestic violence victims during the child support process. Chapter IV

discusses the use of staff specialists in ways that draw on the expertise of partner agencies. Chapter V examines collaborative efforts to increase staff knowledge of the missions and procedures of other agencies. Chapter VI, in concluding, provides a summary of the broad areas in which agency coordination has attempted to bridge gaps and address the safety concerns of TANF clients who are victims of domestic violence.

II. PROFILES OF THE FOUR STUDY STATES

The four states in our study recently refined their child support and domestic violence policies in response to 1996 federal welfare reform legislation. This chapter describes the planning process for and implementation of those policies through OCSE-supported demonstration projects in three local communities—Boston, Massachusetts; Hennepin County, Minnesota; and Jackson County, Missouri—and statewide in Oregon. Two of the demonstration projects, Massachusetts and Minnesota, implemented their activities in three distinct phases, while Missouri and Oregon had a more gradual, multitiered implementation process.

All four sites convened interagency planning committees that included representatives of public assistance, child support, and domestic violence service agencies to review their policies on child support enforcement and domestic violence. Sites differed in the extent to which they emphasized strategies to help victims pursue child support safely, and whether they focused only on domestic violence or on broader reasons for noncooperation with child support requirements. Key elements of each site's initiative are summarized in Table II.1. All of the sites examined ways to identify public assistance recipients who have been, are, or who are potentially victims of domestic violence, though method and responsibility for this differ by site. Efforts to increase client cooperation with child support requirements, to designate specialized staff to address client issues, and to develop procedures for the safe pursuit of child support are also summarized in the table. Details on each state's domestic violence and child support policies are included in Appendix A.

A. DEMONSTRATION PROJECT IN BOSTON, MASSACHUSETTS

OCSE awarded a Section 1115 grant to the Massachusetts Department of Revenue's (DOR) Child Support Enforcement Division in 1997 for a demonstration project on domestic violence

TABLE II.1

EMPHASIS OF STUDY SITES' CHILD SUPPORT AND DOMESTIC VIOLENCE INITIATIVES^a

	Boston, Massachusetts	Hennepin County, Minnesota	Jackson County, Missouri	Oregon
Testing methods for identifying domestic violence victims	Public assistance caseworkers give clients written notification of domestic violence resources to encourage them to disclose abuse; some caseworkers directly question clients on domestic violence; on-site domestic violence experts offer in-depth assessments	Some child support caseworkers conduct preliminary screenings of personal issues that could affect cooperation with child support enforcement and offer in-depth assessments; specialized child support caseworkers—resource workers—who are located at the public assistance office also offer cursory screenings and in-depth assessments	Public assistance caseworkers conduct cursory screenings to identify domestic violence victims and offer in-depth assessments to clients who are victims	Public assistance caseworkers can use a state-developed assessment tool to identify victims of domestic violence; the caseworkers can modify the assessment tool to address local needs
Increasing cooperation with child support enforcement		Child support caseworkers conduct immediate telephone, immediate video, delayed in-person, or immediate in-person interviews with clients after their public assistance intake interview to discover if cooperation differs among the interviewing methods; some child support workers directly question clients on reasons for not cooperating with child support enforcement		
Introducing specialized staff	Domestic violence experts at public assistance agencies assist clients with needs assessments, applying for good cause exemptions, accessing community services, and developing safety plans; a domestic violence project attorney is a liaison with battered women's programs, coordinates activities with domestic violence experts, visits public assistance offices to review experts' cases that have child support issues, and provides other assistance to help clients safely pursue child support	Resource workers conduct immediate in-person child support interviews at the public assistance office after clients' intake interviews, assess barriers to cooperation with child support requirements, and make referrals to community services		Local and regional child support programs and public assistance agencies designate in-house staff to be domestic violence "point people" who are liaisons with their agency's central office and partner agencies, including domestic violence service providers, and offer training and support to their agency's staff
Developing procedures for the safe pursuit of child support	The domestic violence project attorney reviews child support actions in cases with domestic violence, helps ensure that proper action was taken, and works to develop practices to enhance client safety		Clients have the option of requesting an alternative address to their home address where child support caseworkers would mail agency documents; the state is developing family violence indicators that can be used in county public assistance and child support agencies' automated information systems as well as criteria for placing a domestic violence flag in the Federal Parent Locator System.	Child support program workers can mail agency documents to an alternative address instead of a client's home address; workers can also cover clients' personal information in copies of legal documents that go to court

^aThe information in the table may describe activities in one or more phases of the demonstration projects.

and welfare reform. The project, implemented in the Boston area Department of Transitional Assistance (DTA) offices and at DOR, tests different approaches to identifying domestic violence victims and meeting their safety and child support needs.

Planning

In response to domestic violence provisions in 1996 federal welfare reform legislation, an interagency working group formed to propose changes to state policy. The group included representatives from DTA, DOR, Department of Social Services, and Executive Office of Health and Human Services. Subsequently, in 1997 DTA formed a domestic violence advisory board that included government agency staff as well as members of the domestic violence advocacy community. This collaborative advisory board was supported by a second grant to DTA from the U.S. Department of Health and Human Services, which also supported statewide domestic violence training for DTA staff.

Planning for the OCSE-sponsored demonstration project built upon earlier efforts of the Massachusetts Governor's Commission on Domestic Violence. The commission, which examined the effect of welfare reform on battered women, released a report in early 1997 that offered policy recommendations on assisting public assistance recipients who were domestic violence victims. DOR and DTA implemented one of the key recommendations, stationing domestic violence specialists at DTA offices, as part of the demonstration project. The agencies also planned to examine methods of screening and disclosure for domestic violence victims in the project.

Activities

The demonstration project has three phases, which have successively refined methods for identifying domestic violence victims. These methods were tested in four DTA offices in Boston: Bowdoin Park, Grove Hall, Davis Square, and Newmarket.¹

Phase One. In this phase, DTA caseworkers offered public assistance applicants and recipients “universal notification.” Each applicant was given written materials on domestic violence issues and the availability of good cause exemptions from child support cooperation, work participation, the family cap policy, TANF time limits, and teen parent school attendance requirements. Written materials were available in 12 languages other than English. Caseworkers also explained orally what was meant by “good cause.”

Phase Two. DTA caseworkers continued to offer public assistance applicants and recipients universal notification, but also began informing them of the availability of on-site domestic violence specialists. The demonstration project hired one specialist to work at each of four Boston DTA offices.² The specialists’ responsibilities include assessing domestic violence victims; helping them apply for good cause exemptions and family violence option waivers, and make plans for economic self-sufficiency; making referrals to community service providers and shelters; and supporting DTA staff.

¹Boston was selected for the demonstration because of the large number of public assistance offices and size of the population receiving public assistance. This allowed for the collection of comparable data across agencies, and for similar clients. During the demonstration project, the Bowdoin Park DTA office closed and its clients and caseworkers were integrated into the Grove Hall DTA office.

²DTA also hired four domestic violence specialists to serve multiple DTA offices in regions throughout the state. As of July 2000, DTA has assumed responsibility for having specialists serve all local DTA offices and has hired some of the DOR domestic violence specialist staff.

Phase Three. Building on the approaches in the first two phases, DTA introduced direct questioning of clients by public assistance caseworkers.³ Caseworkers asked specific questions to identify domestic violence victims and then referred them to on-site domestic violence specialists. This change shifted from a passive notification procedure, which placed full responsibility for disclosure of domestic violence with clients, to an active one that attempts to detect problems that clients might not otherwise reveal.

During this phase, the demonstration project also sponsored the efforts of a domestic violence project attorney. This attorney, based in the Boston DOR office, acts as a liaison with battered women's programs, coordinates activities with DTA specialists, and visits DTA offices to review the specialists' cases when they have child support issues. She also reviews child support actions in cases with domestic violence, helps ensure that proper action was taken, and works to develop practices to enhance client safety.

B. DEMONSTRATION PROJECT IN HENNEPIN COUNTY, MINNESOTA

OCSE awarded a Section 1115 grant to the Minnesota Department of Human Services (MDHS) in 1997 for a demonstration project in Hennepin County, Minnesota. The project, administered by the Collections Services Division (CSD) of the Hennepin County Department of Economic Assistance (DEA), tests new procedures for obtaining public assistance recipients' cooperation with child support requirements and explores reasons for noncooperation.

³Researchers conducting the evaluation in Massachusetts have found that disclosure rates of domestic violence vary widely by approach: under universal notification, in which clients are expected to volunteer information about abuse in response to a notification process or brochure, only nine percent of clients spontaneously disclosed domestic violence; under direct questioning by independent researchers, 35 percent disclosed domestic violence (Griswold, Pearson, and Thoennes 2000).

Planning

An advisory board plans activities for and reviews the implementation of the demonstration project. The board includes representatives from a state agency, MDHS, as well as from a variety of Hennepin County agencies: the Collection Services and Family Assistance Divisions of the DEA; the County Attorney's office; the County Planning and Development office; and four county service providers. A special work group, consisting of Hennepin County child support and public assistance staff, coordinated the implementation of interactive video interviewing methods.

Activities

The demonstration project builds on earlier efforts to overcome perceived difficulties associated with the physical separation of the Hennepin County child support and public assistance agencies. Concerned that clients were burdened by having to go to two different locations, a previous, six-month pilot project (October 1995 to April 1996) in the county sought to improve public assistance recipients' cooperation with child support requirements by enhancing communication between the two agencies. The pilot used desktop computers with two-way video and voice communication to allow child support staff to conduct interviews from their office with public assistance applicants after their intake interviews at the welfare office. Hennepin County's current project expands upon this effort, testing whether child support interviews conducted by telephone or through video technology to reduce client travel affect cooperation with child support requirements.

Phase One. The first phase of the project tested three methods of conducting child support interviews after public assistance intake interviews. Applicants were randomly assigned to one of the following methods:

- ***Immediate Telephone Interviews.*** After the TANF intake interview, applicants at the public assistance agency spoke with child support caseworkers by telephone.
- ***Immediate Video Interviews.*** Child support caseworkers spoke with clients after their TANF intake interview through an interactive two-way video and voice communication system.
- ***Delayed In-Person Interviews.*** Following the TANF intake interview, child support caseworkers made appointments to speak with applicants face to face at the child support agency within the next few weeks.

The purpose of this effort was to discover whether the quality of applicants' information and instances of cooperation differed among the interviewing methods. Some child support caseworkers volunteered to conduct the telephone and video interviews, and all caseworkers conducted delayed, in-person interviews.

Phase Two. In this phase, the immediate telephone and video interviews were retained, but the delayed in-person interviews were replaced by immediate in-person interviews. Two resource workers, who were specially designated child support caseworkers, administered the immediate in-person interviews at a public assistance agency. These workers also offered referrals to community service providers.

Regardless of the interviewing method used, a second aspect of this phase included questioning clients directly on their reasons for not cooperating with child support requirements (if they were not). As part of the child support interview, staff conducted a cursory screening of issues, including domestic violence, that might make it difficult for a person to cooperate with child support enforcement. If a resource worker was conducting the screening and an applicant answered "yes" to any question, the worker then conducted an in-depth needs assessment. If a caseworker was conducting the screening over the telephone or through video and an applicant answered "yes" to any question, the caseworker asked if she would like to meet with a resource worker for a needs assessment. Toward the end of the project, the resource workers began

training the child support caseworkers who conduct video and telephone interviews so they can also offer in-depth assessments.

Phase Three. In phase three, project staff chose in-person immediate interviewing as the method to be used for all initial child support interviews. This choice reflected concerns with the other two methods, particularly video interviewing. Some staff and clients found it somewhat disorienting that words spoken through the audio system did not exactly match the timing of the speaker's mouth movements on the video screen. Video interviews also caused a logistical disruption noted by staff, since they had to leave their desks and conduct the interviews in a special booth.

In this phase, the immediate interviews are being expanded so that child support caseworkers can ask clients about information that was not captured during the public assistance interview. In addition, caseworkers are receiving additional training on interviewing techniques and staff team-building.

C. DEMONSTRATION PROJECT IN JACKSON COUNTY, MISSOURI

Missouri's Division of Child Support Enforcement (DCSE) received a Section 1115 grant in 1997 from OCSE to conduct a demonstration project in Jackson County, Missouri. The primary goals of the demonstration are to increase the safety of domestic violence victims who are clients of DCSE offices and strengthen child support collections for them and their families.⁴ To accomplish these goals, DCSE, Division of Family Services (DFS), and prosecuting attorney's offices in Jackson County are implementing new procedures for identifying domestic violence

⁴Other goals of the project are to obtain information on domestic violence victims in the state's child support caseload and to discover the impact of early outreach to victims on their continued cohabitation with abusers, application for public assistance, and receipt of child support.

victims and specially handling their cases. After initial implementation in Jackson County, the procedures will be refined and adopted statewide.

Planning

To plan for the demonstration, DCSE convened a Domestic Violence Grant Implementation Team. The team included representatives from state DCSE and DFS offices; Jackson County prosecuting attorney's, DCSE, and DFS offices; and statewide and Jackson County domestic violence organizations. Members of the team developed and then evaluated the implementation of new agency procedures and client assessment tools that address domestic violence issues.

Activities

New procedures were developed to increase the safety of domestic violence victims, and caseworkers in Jackson County were trained on the procedures and began to use them. The main activities of the demonstration, implemented in a gradual process from 1997 to 2000, are:

- ***Developing New Good Cause Procedures.*** A subset of the implementation team, DCSE and DFS policy writers, developed procedures for their own agencies. These procedures involved how staff should use screening and assessment tools, provide information on local domestic violence resources, and offer assistance with good cause waivers from child support cooperation requirements.
- ***Reviewing Procedures and Creating Assessment Tools.*** The broader implementation team reviewed DFS's and DCSE's procedures to ensure that they were consistent. They also developed screening and assessment tools for child support and public assistance caseworkers to use with clients. Public assistance and child support agency caseworkers use uniform interview protocols to (1) screen individuals for domestic violence, and (2) provide in-depth needs assessment. At public assistance agencies, caseworkers conduct a cursory screening of TANF and Medicaid applicants during intake and interim visits to identify victims of domestic abuse. If an applicant or client indicates that she has experienced domestic violence and fears her abuser, the caseworker conducts an in-depth assessment. The assessment process collects information on an individual's level of concern for her and her children's safety, ability to engage in work activities, and willingness to cooperate with paternity establishment and/or enforcement of a child support order.
- ***Training Staff on New Procedures.*** Trainers from DCSE and DFS collaborated with trainers from the Missouri Coalition Against Domestic Violence (MCADV), a

statewide domestic violence advocacy organization, to conduct training on the dynamics of domestic violence and new agency procedures. Staff at Jackson County's DCSE, DFS, and prosecuting attorney's offices were trained first, and then the training was offered by regional training teams to staff at the three agencies statewide. Domestic violence service providers from local communities also attended the training sessions.

- ***Protecting Client Confidentiality.*** The implementation team developed two methods for agencies throughout the state to use in protecting domestic violence victims. One method allows DCSE and DFS staff to flag domestic violence cases in their automated information systems. A second method allows DCSE staff to keep victims' home addresses confidential.
- ***Providing Resources on Domestic Violence.*** MCADV developed a resource directory of domestic violence service providers in the state and educational materials for caseworkers to use when referring victims to services.

D. CHILD SUPPORT AND DOMESTIC VIOLENCE PROCEDURES IN OREGON⁵

In response to the FVO provision of 1996 federal welfare reform legislation, Oregon has implemented new child support and domestic violence procedures statewide.⁶ This profile describes planning undertaken by state offices in Oregon to develop policies that address the needs of domestic violence victims and other clients with safety concerns. Key offices involved in this effort include the Oregon Department of Human Services' Adult and Family Services Division (AFS), which administers the Oregon Child Support Program (CSP), as well as the Oregon Department of Justice's Division of Child Support (DCS) and county District Attorney's (DA's) offices, which are contracted by AFS to implement the CSP.⁷ The profile also describes

⁵Unlike the other states in our study, Oregon does not have a Section 1115 grant from OCSE to conduct a demonstration project. Therefore, Oregon's statewide policy innovations are discussed in this profile. The information is based on conversations with respondents in Grants Pass-Josephine and Medford-Jackson counties in southern Oregon.

⁶Oregon received a welfare reform waiver prior to the passage of PRWORA. As a result, the state has been working to refine policies and procedures longer than many other states.

⁷In this profile, state-level CSP staff refer to staff at AFS, DCS, and DA's offices. Local CSP staff refer to staff in local DCS and DA's offices.

initiatives to inform local child support and public assistance agency staff and partner agencies of the new policies.

Planning

AFS, domestic violence service providers, and other partner agencies developed Oregon's child support and domestic violence policies. AFS sponsored an appraisal of statewide domestic violence services and convened an interagency committee to review and revise AFS policy on domestic violence. The agency also worked with domestic violence advocates, particularly the Oregon Coalition Against Domestic and Sexual Violence (the Oregon Coalition), to implement a bill that included elements of the FVO provisions in state law.⁸

The legislation developed by AFS, the Oregon Coalition, and other domestic violence advocates, House Bill 3112, became law in June 1997.⁹ Among other provisions, it requires AFS to identify public assistance applicants and recipients who have been, are, or who are potentially victims of domestic violence and offer them individualized case management, make referrals to community services, and offer waivers from TANF requirements, including cooperation with child support enforcement.

Subsequent to the 1997 legislation, an interagency committee on CSP confidentiality issues began to focus on domestic violence. The group reviewed the CSP's policy on good cause exemptions and client confidentiality and developed new approaches to ensuring the safety of domestic violence victims. In addition to state-level staff from the CSP program and other AFS staff, participants in this group included representatives from Services to Children and Families,

⁸The Oregon Coalition is a coalition of domestic violence service providers from throughout the state.

⁹ORS 411.117.

the Oregon Health Division, Legal Aid Services of Oregon, Oregon Employment Division, the Oregon Coalition, and the state Court Administrator's office.

Aspects of Child Support and Domestic Violence Strategies

Oregon's state-level CSP staff and other state-level AFS staff adopted a variety of approaches to ensure that state policies addressing the needs of domestic violence victims were implemented at local agencies across the state. In addition to developing procedures for local AFS staff to use to assess clients for domestic violence safety concerns and offering them safety options, they also sponsored staff training sessions on new policies and instituted district liaisons. CSP staff from local DCS and DA's offices also helped plan for and participated in the training.

Developing a Model Assessment Tool. To help AFS branch offices fulfill requirements of House Bill 3112, which stipulates that AFS offices identify victims of domestic violence, state-level AFS and Oregon Coalition staff developed a model assessment tool. This assessment tool contains a series of questions that can be asked during initial TANF intake interviews or subsequent interactions with clients. AFS encourages its branch offices to refine the assessment tool to address local needs or develop their own tool in collaboration with their local domestic violence service providers.

Customizing Client Safety Options. The committee on CSP confidentiality issues developed a three-tiered approach to protect the privacy and safety of domestic violence victims in the child support system.

- ***Address of Record.*** Clients with safety concerns but who still want child support can request an address of record.¹⁰ Paternity and child support enforcement action is taken but an address other than a home address is used on legal papers.
- ***Non-Disclosure Based on a Claim of Risk.*** Clients with safety concerns who want information in addition to their home address to be held confidential can request a non-disclosure based on a claim of risk. Paternity and child support enforcement action is taken, but legal papers, including those that go to the court, conceal not only address but also any other personal identifying information such as phone numbers, driver's license information, and social security numbers. An address of record is required to obtain a claim of risk.
- ***Good Cause.*** Clients who feel that child support actions would put them at too great of a risk of incurring violence can request a good cause waiver, and no paternity or child support enforcement action is taken.

Sponsoring a Multi-Faceted Training Program. Through a 1997 grant from the U.S. Department of Health and Human Services, AFS, the Oregon Coalition, and other domestic violence service providers offered training on domestic violence. The training, which was for local AFS, CSP, and domestic violence agency staff, included three strategies. First, an expert trainer developed an advanced curriculum on domestic violence and case management and then trained staff across the state. Second, a session was conducted to prepare local AFS staff and its partners to facilitate non-physical self-defense courses. Third, Ed-net educational broadcasts on closed circuit television, featuring such topics as child support and domestic violence, were televised at community locations statewide. Local AFS and CSP staff and other partners watched the broadcasts together at community viewing sites, phoned in questions to be answered on the air, and then participated in local discussions on the topic after the broadcast.

In addition to training sessions sponsored by the grant, state-level AFS, DCS, and DA's offices sponsored their own training to inform staff of new or revised policies on confidentiality

¹⁰The address of record can be used by either party in child support actions, even if domestic violence is not an issue.

and safety concerns, and local AFS and CSP offices collaborated with community domestic violence service providers to design local training on the dynamics of domestic violence.

Designating Agency Liaisons. AFS and CSP local district and regional offices selected staff to be domestic violence “point people.” Point people are liaisons with their agency’s central office and partner agencies, including domestic violence service providers. Point people can be either senior-level staff—office managers and supervisors—or line staff. They perform a variety of activities, including disseminating state-level policy to staff at their offices, sharing staff’s reactions with the central office, coordinating training sessions with local service providers, supporting staff whose clients are domestic violence victims, and participating in local domestic violence councils. AFS and CSP point people and representatives from partner organizations, such as domestic violence service providers, attend quarterly meetings to share information and coordinate their efforts.

III. INTERAGENCY PROCEDURES TO SAFEGUARD CLIENTS

A critical component of a coordinated interagency response to the dual concerns of child support enforcement and domestic violence victims' safety lies in interagency procedures. Methods for collecting and communicating information about clients are particularly important when clients are victims of domestic violence. If interagency information exchange is not timely, if communication gaps exist, or if confidentiality can be easily breached, clients will be at risk of further victimization. To refine how information is collected, stored, and conveyed among staff, the agencies in the four sites we examined have taken steps to (1) alert all relevant staff to cases that involve domestic violence, and (2) preserve confidentiality during child support collection to ensure client safety.

A. ALERTING STAFF

The agencies in the four focal sites have taken important steps toward supporting women in the disclosure of domestic violence. In recognition of the growing body of research that suggests the need for a supportive, nonjudgmental, and confidential environment in which to voluntarily disclose the presence of domestic violence in victims' lives, these sites have provided training, developed assessment tools, and added staff expertise to improve the identification and assessment processes. Chapter IV discusses the use of specialized staff to conduct in-depth client assessments to address issues related to domestic violence. Here we focus on what agencies are doing, once domestic violence is disclosed, to alert all relevant staff—across agencies—of these cases in order to ensure that they are handled with appropriate sensitivity.

Alerting staff across agencies entails the exchange of important pieces of information. This information can include, in addition to the fact that domestic violence has been disclosed,

confidential address information, the case's exemption status, documentation of referrals, and notes that discuss special concerns or handling procedures. Whether this information is maintained on paper or electronically, both formats present pitfalls that can undermine the reliability of agencies' use of information on victims of domestic violence. For records maintained in paper form, there is some risk that important information gets lost in the sheer volume of agency documents; files tend to look alike and, as a consequence, victims and non-victims of domestic violence are treated similarly; and critical status information can get buried several layers down in a file. Electronic systems can cause automatic enforcement of certain collection procedures, such as revocation of a hunting license, that could perpetuate more violence.

Another risk arises from differences in agency terminology. Whether they use paper or computerized records, agencies sometimes have unique terminology to describe a client's status or situation, and in some cases, the same term can have one meaning to a public assistance caseworker and another to a child support caseworker. For example, income exceeding the resource limit can lead to TANF "case closure" at a public assistance agency, but "case closure" at a child support agency might apply to action taken as the result of failure to establish paternity, termination of a child support order, or inability to locate a noncustodial parent. The result in this example might be that a client who has just found employment and left TANF loses the income from child support.

Agencies are instituting new systems and procedures for using paper and electronic media so that domestic violence cases are effectively passed from worker to worker, with clearer directives to take special precautions. Strategies in the four focal sites include the following:

- ***Color-Coding Files or Attaching Cover Memos.*** Public assistance and child support staff in Massachusetts, Missouri, and Oregon use colored jackets for paper files or attach cover memos to draw attention to cases with domestic violence.
- ***Establishing Shared Computer Screens and Common Codes.*** Creating designated screens that can be viewed by workers at child support and public assistance agencies expedites the transmittal of information. To help staff interpret these screens, some agencies are developing common codes for classifying a case's status.
- ***Maintaining Case Notes Electronically.*** Recording all case notes in automated information systems rather than on paper helps to document case activity thoroughly and facilitates rapid sharing of case notes among public assistance and child support workers.
- ***Developing a System of Electronic Immediate Messaging.*** This approach provides an immediate alert to a worker that a case needs special handling. If the recipient selects an option on his or her computer to activate this "alert," messages immediately appear on the computer screen.
- ***Allowing for Manual Disabling of Automatic Computer-Based Child Support Enforcement Procedures.*** This approach allows child support staff to manually shut off certain collection procedures for domestic violence victims who want to safely pursue child support. Such special precautions may be needed in order to avoid further abuse.

While these approaches are designed to address particular challenges and promote effective flow of client information, there are several important implementation issues that have arisen and that agencies interested in adopting these approaches ought to consider. Effective exchange of information requires that one party convey information in a timely way and that another party read it promptly. Even with a shared computer system, public assistance caseworkers must enter important child support information without delay to make it useful to child support workers (and vice versa). In addition, immediate messaging is effective only if a caseworker on the receiving end activates the alert option so messages will automatically appear on his or her computer screen. Agencies that use electronic messaging must train staff to read messages right away and provide the appropriate response. Otherwise, those sending messages start to doubt that their communications are being read and may become lax in their use of the system.

To some extent, of course, interagency communication can be expected to improve as a culture of collaboration takes deeper root. As the exchange of written, electronic, and verbal information between agencies becomes routine, staff are likely to gain understanding of the relevance and importance of information to partner agencies and, hence, greater respect for the process. Some collaborative efforts in improving staff understanding of other agencies are discussed in Chapter V.

B. PRESERVING CONFIDENTIALITY DURING CHILD SUPPORT ENFORCEMENT

Collecting child support for victims of domestic violence requires that agencies share victims' personal information with other agencies while concealing it from abusers. Child support, public assistance, and outside service providers often can better help victims pursue child support by exchanging information on client status, receipt of services, and program participation. All agencies, however, risk confidentiality (and thus safety) breaches when case information is transmitted from one agency to another for any victim of domestic violence. Special precautions are needed, therefore, in the interagency handling of personal information to protect clients from their batterers.

Multiple agencies exchange information on victims of domestic violence during the child support process. In some study states, public assistance caseworkers conduct child support intake and forward information from the interview to a child support agency. Child support agencies directly and indirectly collect information on clients and many send cases to legal staff, who initiate court actions (for example, establishing child support orders). During the child support collection process, both public assistance and child support agencies may need to contact shelters where domestic violence victims are staying to inform them of case action or collect further information.

The interagency exchange of client information presents three main confidentiality and safety concerns. First, agencies may not have clients' consent to share information with community providers. Second, personal information about clients could be divulged during legal proceedings and then obtained by batterers. Third, if court personnel are not aware that a case involves domestic violence, they may inadvertently fail to protect domestic violence victims from their batterers during court appearances.

To address these issues, agencies in the study sites are adopting collaborative approaches to protecting client confidentiality and safety during child support enforcement:

- ***Using Alternative Client Address.*** Child support agencies in Missouri and Oregon can use an address for domestic violence victims that differs from their home address. This alternative address, which can be a post office box or the address of a child support agency, is used in the child support agency's official correspondence so a batterer does not discover a victim's home address.¹
- ***Concealing Personal Information in Legal Documents.*** For legal documents that are sent to court, child support agencies in Oregon offer victims the opportunity to have personal information covered over—such as phone numbers, social security numbers, and employer names—so that a batterer could not access this information.
- ***Explicitly Authorizing Information Sharing.*** In order for agency staff to share information among public assistance, child support, and domestic violence service providers, some agencies request that clients sign a release granting permission.
- ***Establishing Relationships with Court Staff.*** Agencies have developed relationships with court personnel to minimize a client's risk from her batterer. A child support worker may contact court personnel to alert them to a pending case; court staff then can find a safe place for a client to wait before a court appearance, help the client leave the courthouse safely, and make sure the client and her batterer do not stand near each other during a hearing.

¹These programs are similar to the Address Confidentiality Program (ACP), in operation in the state of Washington since 1991. ACP provides a confidential substitute address for any victim of domestic violence who seeks to escape an abusive environment. Participants' mail is forwarded by the state to the confidential address, and the program also protects participants' voting and marriage records. It also provides them with special identification cards they can use when applying for a driver's license or child support.

There are several important implementation issues that agencies interested in adopting these approaches ought to consider. Agencies need to agree on the specific conditions for and limits on release of confidential client information, even when client consent is provided, because one agency's release form may stipulate sharing confidential information more widely than another agency feels is appropriate. In addition, the confidentiality of home addresses needs to be guaranteed, since many different parties' access to the child support computer system increases the potential for a security breach. In some cases, it may not be appropriate to share client information beyond the staff of a single agency, and this should be acknowledged and understood. Despite general guidelines about how to share and protect information, local circumstances may make it unwise to share more than the most essential information. For example, sharing information in a small community, where personal connections are more common, poses a greater risk of access by an abuser than in a larger community. Finally, as in all approaches, special supplemental or precautionary steps require additional time, staff awareness, and staff commitment to the cause at hand. Where the sharing of information is appropriate and would benefit the client, staff training and administrative support for the special handling of domestic violence cases can help to reduce these risks.

IV. ASSIGNING THE RIGHT STAFF

As PRWORA pushes child support and public assistance agencies to extend their responsibilities beyond traditional boundaries, they increasingly need specialized staff—workers with special skills, training, or assignment—who can coordinate the delivery of services. Assessing the needs of victims of domestic violence and developing safety plans, for example, require a level of skill and sensitivity to domestic violence issues beyond what most caseworkers are trained to provide. Provisions of the FVO stipulate that such work must be done by a person trained in domestic violence. To comply, local agencies in the four study sites are collaborating in various ways to meet this mandate, sometimes designating internal staff and other times engaging staff from community service providers to conduct these activities.

Several factors in addition to the FVO stipulation contribute to the need for specialized staff, particularly for the assessment of domestic violence victims. Large caseloads can limit the time available for assisting victims. Caseworkers who lack experience working with victims or are not sensitive to their needs may inadvertently traumatize them or jeopardize their safety. Some staff are, themselves, current or former victims of domestic violence and may be unduly stressed by having to assess victims' needs. In rare instances, caseworkers were—or still are—abusers and are unlikely to perform assessment well.

In addition to work demands and personal experiences, another issue that complicates assessment for caseworkers is that clients may not feel comfortable confiding in them. Some clients fear that discussing their domestic violence experiences with caseworkers who are required by law to report child abuse could jeopardize custody of their children. Others have adversarial relationships with their caseworkers and choose not to discuss their abuse. In

addition, some clients are reluctant to share personal information with male caseworkers, because they associate men with abuse.

In response to such factors, the agencies in our focal sites have created two types of specialized staffing positions: (1) specially designated internal staff—public assistance and child support caseworkers—who assist domestic violence victims, and (2) domestic violence experts from external agencies who serve clients in public assistance offices.

A. USING IN-HOUSE SPECIALISTS

To serve domestic violence victims more effectively, some public assistance and child support agencies in our focal states are creating specialized roles for internal staff. Under this arrangement, victims are assessed by a caseworker who is likely to be sensitive to and knowledgeable about domestic violence issues. These specialized caseworkers can focus on coordinating services for these clients with child support staff and community-based domestic violence service providers.

Deploying specialists involves selecting caseworkers, defining their new responsibilities, and establishing their location. To recruit candidates best suited for these specialized positions, some agencies seek volunteers from among their caseworkers. This is intended to attract those most interested in working with domestic violence victims and most sensitive to their needs—often caseworkers who already have some experience working with community-based domestic violence agencies.

Roles and responsibilities of specialized staff vary depending on whether staff are located at the IV-A agency or the IV-D agency (Table IV.1). To enable them to focus on their targeted responsibilities, specialized staff in the study sites were generally assigned a specially defined caseload, often exclusively domestic violence victims. Staff who assess clients' needs and make referrals to community services work at public assistance agencies, where they have regular

TABLE IV.1

TYPES OF SPECIALIZED STAFF AT CHILD SUPPORT AND PUBLIC ASSISTANCE AGENCIES IN STUDY SITES

	Specialized IV-A Caseworkers		Specialized IV-D Caseworkers			External DV Experts	
	MN	OR	MN	MO	MA	OR	
Location of Staff	IV-A	IV-A	IV-D	IV-A	IV-D	IV-A	IV-A
Clients Served	DV victims with good cause exemptions	DV victims	Public assistance recipients with pending good cause claims	Public assistance recipients with new child support cases	DV victims seeking child support	DV victims referred by IV-A caseworkers	DV victims referred by IV-A caseworkers
Assistance to Clients							
Assesses Needs	X	X		X		X	X
Refers to Service Providers	X	X		X		X	X
Assists with Safety Plans	X	X				X	X
Assists with Good Cause Claim ^a	X	X				X	X
Determines Good Cause Claim ^a		X	X	X			
Helps Pursue Child Support Safely		X	X		X		
Assistance to Staff							
Assists with DV Cases	X					X	X
Counsels on Personal DV Issues							X
Funding for Staff	IV-A	IV-A	IV-D	IV-D's OCSE grant	IV-D	IV-D's OCSE grant	Community provider's VOCA grant

NOTES: IV-A=public assistance agency; IV-D=child support agency; DV=domestic violence; OCSE=Office of Child Support Enforcement; VOCA=Victims of Crimes Act.

^a Good cause claim for exemption from child support cooperation requirements.

contact with clients. These can be both IV-A staff or IV-D staff, as is the case in Minnesota. Staff who exclusively assist clients with the child support process, such as the IV-D caseworkers in Minnesota and Missouri, generally require less in-person client contact and work at child support agencies.

Local agencies cite several benefits to designating internal specialists for these roles. These positions allow internal staff to develop expertise on domestic violence; to perform their new responsibilities, some caseworkers receive special training by community service providers. Another advantage of these staffing arrangements is that they increase the attention that domestic violence victims receive throughout their involvement with local agencies. This, in turn, results in more timely and thorough collection of client information. Specialized staff also can act as an agency's liaison with partner organizations, sharing information on clients' progress with local agency staff and, when appropriate, with community service providers. Designating one caseworker to communicate with other agencies increases the consistency of shared information and builds trust between organizations.

Using staff specialists to serve clients also presents some issues that must be addressed. Expanding the TANF intake or child support processes to include client interaction with these specialists often increases the time that clients must spend at agencies. Also, when agencies concentrate expertise on domestic violence within a few staff members, they need to ensure that other caseworkers remain sensitive to the subject so they can adequately help clients who have not yet disclosed that they are victims. Another consequence of specialized staffing is that if a long-term recipient of public assistance informs a caseworker of her abuse, her case may shift from the caseworker who is familiar with her and who has extensive knowledge of the case to a specialized caseworker. This shift forces a client to start over in developing trust, which some clients may resist or find difficult to do.

B. TAPPING EXTERNAL DOMESTIC VIOLENCE EXPERTS

Some focal states have developed collaborative relationships with domestic violence service providers by hiring these external experts to assist victims (Table IV.1). The public assistance agencies in Massachusetts and Oregon concluded that expert counselors should perform certain activities, such as developing victims' safety plans, because they have extensive training and experience in domestic violence issues. Expert counselors work at public assistance agencies from a few hours each week to full-time, and they are used by the agencies either instead of or in addition to staff specialists. They educate caseworkers on the dynamics of domestic violence and provide support to those working with victims. In addition, counselors' familiarity with domestic violence organizations helps public assistance agencies build partnerships with community providers.

Expert counselors offer a variety of assistance to clients. They assess clients' needs, make referrals to community services, develop safety plans, and assist with applications for good cause exemptions from child support requirements. Counselors also support staff at the public assistance agency, offering educational resources, training sessions, and individual counseling on personal domestic violence issues. They educate caseworkers on the dynamics of domestic violence and provide support to those working with victims. In addition, counselors' familiarity with domestic violence organizations helps public assistance agencies build partnerships with community providers.

Locating counselors at public assistance agencies has several advantages. They are not constrained by TANF eligibility issues (as are caseworkers), so they can focus more on developing an individualized response to clients' needs. In addition, clients may feel more comfortable confiding in them than in caseworkers, because counselors are not involved in determining clients' cash grants or imposing sanctions on cases.

The effectiveness of the efforts of expert counselors, however, depends on their integration into public assistance agencies. To consult with counselors in a meaningful way, caseworkers need to understand counselors' roles and responsibilities. Conversely, counselors need to be sensitive to their own positions within agencies; they should be a helpful resource to staff while also being respectful of the established role and expertise of caseworkers. Limited funding can constrain counselors' involvement at agencies, primarily in the form of a reduced number of hours. Being on-site only sporadically or for short periods of time exacerbates the challenges of successful integration. Successful integration may be further jeopardized if counselors feel safety will be compromised too much by the sharing of information. Some counselors feel torn between their duty to clients and their obligation to the public assistance agency; in some instances, to protect client safety, they elect not to share notes with caseworkers.

The public assistance agencies we examined have experimented with two strategies to improve counselors' coordination with caseworkers:

1. ***Developing Partnership Agreements.*** Some public assistance agencies develop partnership agreements with community service providers before counselors are out-stationed. The agreements describe in detail the process for the agencies' interaction, including the roles and responsibilities of counselors and steps to take when issues arise.
2. ***Formalizing Interaction in Agency Processes.*** Other agencies are working to establish an effective working relationship between counselors and caseworkers by formally including counselors in agency processes. For example, they require counselors to sign all good cause waiver requests or safety plans to ensure that caseworkers share information with them.

Another approach to enhancing coordination is increasing counselors' and caseworkers' understanding of each other's positions through cross-training sessions, discussed further in the next chapter.

V. PROMOTING INTERAGENCY UNDERSTANDING

Public assistance, child support, and other service agencies play distinct roles in child support enforcement, but the agencies must work together to achieve child support collection for domestic violence victims while protecting their safety. Collaboration among agencies results in greater efficiency of case handling, less duplication of effort, increased oversight of client support and progress, and greater likelihood of child support collection and client protection. Enhanced by the procedural and staffing changes discussed in the previous two chapters, coordination acquires a firmer grounding when staff in each agency have greater knowledge about, understanding of, and respect for what their partner agencies do.

The obstacles to establishing systemic coordination through greater staff knowledge of partner agencies are not trivial, however. Public assistance, child support, and domestic violence service agencies often interpret each other's missions narrowly and view them as conflicting. Child support staff may view public assistance agencies as focused only on helping individuals obtain cash assistance, and public assistance caseworkers may think of child support agencies as occupied solely with law enforcement. Staff at both agencies may give less recognition to their shared goal of promoting client self-sufficiency. In turn, staff at child support and public assistance agencies may view domestic violence advocates as concerned mostly with protecting client information, which can sometimes hinder collection of child support and redetermination of TANF benefits.

Differences in agencies' interactions with clients also present challenges to coordination. Staff at public assistance agencies have frequent, in-person contact with clients and focus discussions on TANF requirements, supportive services, and ongoing counseling. Staff at child support agencies, in contrast, often interact with clients by telephone to collect specific

information related to child support collections, with in-person contact only during a court appearance. The net result of these fundamental differences in mission and case handling is often an underlying mistrust between agencies—a substantial challenge that must be overcome if a coordinated response system is to be achieved. Agencies in our focal states have attempted to bridge these interagency divides through two collaborative approaches: (1) cross-training, and (2) out-stationing of staff.

A. CROSS-TRAINING TO SHARE SKILLS AND PERSPECTIVES

Staff of child support and public assistance agencies receive training on their own agencies' procedures but may be unfamiliar with how other agencies work. This lack of understanding may limit or reduce how well staff coordinate with others to provide services to clients. Cross-training is one approach the focal states have used to increase the knowledge that public assistance and child support staff have of each other's roles.

Cross-training staff can feature formal presentations of agency policies and procedures or information about the dynamics of domestic violence. These sessions sometimes offer training to staff from more than one agency and sometimes feature training *by* the staff of one agency *for* the staff of another. Agencies in our focal states described both types of efforts, which include the following initiatives:

- Training on child support issues provided to public assistance, child support, and local domestic violence services staff together
- Training on TANF policies for local domestic violence services staff, provided by public assistance staff
- Training on domestic violence for all public assistance and child support agency staff, delivered by local domestic violence service providers

Focal states have also taken several, more informal approaches to cross-training. These efforts generally constitute a nonthreatening means of bringing staff from different agencies and

organizations together in ways that help to nurture mutual appreciation and understanding of the environments in which their partners work. Strategies include the following:

- ***“Brown Bag” Discussions and Tours.*** A domestic violence service provider in Missouri hosts lunchtime discussions and agency tours for local public assistance staff to inform them about service provision in their community.
- ***“Buddy Visits” to Other Agencies.*** Some public assistance and child support agencies in Minnesota pair one worker to another from each agency and encourage them to visit each other’s workplace to establish contacts with staff at partner organizations and learn about their responsibilities.
- ***Presentations at All-Staff Meetings.*** Public assistance agencies invite representatives of child support agencies (or vice versa) to all-staff meetings to discuss their approach to service provision or introduce their agency’s most recent procedural changes.
- ***Interagency Committees.*** Some counties designate a committee consisting of child support and public assistance staff to address interagency issues regularly.

The benefits of cross-training are clear to respondents in the four states. While the distrust between organizations can pose a challenge to bringing staff together, cross-training itself is seen as a powerful vehicle for alleviating it. Training that is nonconfrontational and respectful of agency differences can help to break down some stereotypes staff have of one another. Cross-training is a way for staff to learn firsthand about the policies and procedures of other agencies and service providers, to understand the rationale behind approaches to case handling, and to build partnerships that can provide comprehensive services and support for clients. Staff education that extends beyond *what* an agency does to a full discussion of *why* this is done can help in reducing the tensions between organizations and in improving their response to clients’ needs.

Cross-training also presents some implementation issues. Training efforts should take into account that substantial geographic distances between some child support, public assistance, and community domestic violence service agencies can make it difficult for staff to gather in one place. Also, many staff, particularly those who work at agencies with frequent staff turnover,

expressed the need for ongoing education rather than one-time events. Increasing the frequency of cross-training increases the likelihood that staff will fully absorb and implement the information conveyed.

B. STATIONING CHILD SUPPORT STAFF AT PUBLIC ASSISTANCE AGENCIES

Another approach our focal states used to increase staff knowledge of partner agencies was out-stationing staff. This arrangement, which places child support caseworkers at public assistance agencies, helps staff understand not only the procedures of each other's agencies but also the cultures in which they work. Out-stationing also increases the accessibility of staff from other agencies; workers can communicate directly instead of through telephone calls or computer messages. In addition, child support staff, who usually do not see clients in person at their own agency, have more frequent contact with clients when stationed at a public assistance agency.

All the study states have out-stationed child support staff at public assistance agencies. The staff are out-stationed either full- or part-time, and sometimes as little as a half day each month. Given office space and a desk, colocated staff answer public assistance recipients' questions about their child support cases. They also provide public assistance caseworkers with information on child support agency procedures and help them to address client needs, including those involving domestic violence.

This approach has several benefits, most of which are relevant for all child support cases. Staff report a much improved and more frequent communication between public assistance and child support workers, a greater appreciation of each other's roles and responsibilities, and increased knowledge about procedural issues and client information that must be collected. Child support workers who are colocated have more access to clients. This can result in a more complete understanding of each client's circumstances and family, which, in turn, can help staff become more interested in and dedicated to their work.

According to staff interviewed for this study, out-stationing child support workers at the public assistance agencies improves the actual child support enforcement process. Because of this on-site resource, public assistance staff are more likely to convey accurate information to clients, case information is less likely to be lost or misinterpreted, and inconsistencies in clients' stories from caseworker to caseworker are more likely to be detected. In general, the information collected is more current and appropriately detailed, which gives child support staff a better chance of processing cases quickly and locating noncustodial parents.

Out-stationing is also more convenient for clients. With public assistance and child support workers in one place, clients can see them during a single visit and thus reduce travel time and expenses. Avoiding the need for a subsequent appointment virtually eliminates the chance that clients will fail to appear for an appointment with a child support worker.

While staff generally favor this approach and its positive effect on interagency communication, they also cited some implementation issues. Agencies need to be realistic about the costs of out-stationing, which requires office space and computer equipment, as well as clear agreement on which agency pays for these resources. In addition, agencies need to provide appropriate logistical support to out-stationed staff whose home offices are far from their "remote stations." These issues notwithstanding, increasing the frequency of out-stationing may increase the likelihood of its success. The extent to which partner agencies can institutionalize this approach will likely have an impact on its overall effectiveness.

VI. SUMMARY: COORDINATING CHILD SUPPORT AND PUBLIC ASSISTANCE AGENCIES IN THEIR RESPONSE TO DOMESTIC VIOLENCE

Among its major policy provisions, recent federal welfare reform legislation sought to strengthen enforcement of child support for TANF recipients while concurrently helping to protect women who are victims of domestic violence. The Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996 expands penalties for noncustodial parents who fail to pay support and for custodial parents who, without “good cause,” do not cooperate with the child support enforcement process. In addition, recognizing that domestic violence victims may not be able to comply with the new legislation’s cooperation requirements, PRWORA includes two provisions that, under certain circumstances, exempt victims of domestic violence from requirements for cooperating with enforcement: the IV-D good cause policy and the Family Violence Option (FVO).

But for the population of women who are both victims of domestic violence *and* interested in pursuing child support, gaps in current policy continue to neglect important safety considerations. Many of the safety considerations rest in procedures that cross agency boundaries, particularly in the sharing of information and in the understanding of partner agencies’ policies and procedures. In the absence of effective interagency coordination, these gaps—in knowledge, in communication, in concern for safety—present dangers for victims of domestic violence. Our focus, therefore, has been on what these sites have done to improve this interagency coordination while maintaining the dual objectives of child support enforcement and protection of victims of domestic violence.

The experiences of the four sites in our study can offer guidance for policymakers and state and local agencies as they design and implement coordinated responses to domestic violence victims’ dual needs for child support and safety. We summarize these efforts to reach across

traditional agency boundaries in implementing PRWORA's IV-D good cause policy and the FVO in five broad areas. These ideas can help states encourage coordination among public assistance, child support, and domestic violence service providers to serve victims better.

1. ***Tapping the expertise of specialized staff can help address domestic violence concerns.*** In response to the expanded roles and responsibilities for staff under PRWORA, IV-A and IV-D agencies can use three types of specialized staff to assist domestic violence victims. Specialized public assistance caseworkers can develop some expertise on domestic violence and devote the time needed to coordinating service delivery for victims. Child support staff stationed at welfare agencies can assist all public assistance recipients and provide special assistance to recipients with domestic violence issues by helping them pursue child support safely. External domestic violence experts located at public assistance agencies can offer caseworkers and clients access to people with extensive training and expertise in domestic violence issues.
2. ***Supporting local cross-training efforts can deepen understanding among agencies.*** Multiple local agencies may be interested in reciprocal staff training on their respective procedures and culture. Cross-training can be a powerful vehicle for alleviating the mistrust and knowledge gaps that exist among agencies and service providers, and for increasing staff knowledge of community services available to help clients. Agency administrators should foster this type of interaction by giving it appropriate priority. In addition, state funding for cross-training would support this effort. It would also demonstrate that interagency coordination is a priority of senior-level staff.
3. ***Tying information systems together can help protect client safety.*** To serve clients effectively, caseworkers from public assistance and child support agencies must be aware of each other's actions. This is especially true when the client is a victim of domestic violence, because interagency miscommunication could cause clients' personal information to be sent to their batterers. Coordinated electronic information systems can help to alleviate problems of miscommunication. The systems should (1) allow information entered into one agency's management information system to be viewed by workers at other agencies, and (2) enable the information to be viewed by other parties soon after it is entered. The use of computer codes that are common to both agencies would increase understanding of the information. In addition, using a system in which messages immediately appear on the computer screen of the recipient helps to alert workers of cases that require special handling. Allowing for the manual disabling of certain automatic collection procedures also helps to protect further domestic violence victims' safety.
4. ***State sponsorship of domestic violence providers' participation in policy planning adds expertise to the process.*** Domestic violence service providers can make important contributions to policy discussions because of their vast knowledge of domestic violence issues and of the local communities in which they are located. However, these agencies may lack the funding to do so. Offering the modest funding

needed to enable providers to participate promotes fuller collaboration by these agencies.

5. ***Local staff participation in planning or reviewing policies and procedures helps address operational concerns.*** The preceding approaches to encouraging interagency coordination are enhanced when policies and procedures are developed jointly by state and local staff, or reviewed by local staff once drafted. Committees that plan state policy usually include representatives of state-level agencies but may not include local-level staff. It is important to include the perspective of local-level staff because they can offer practical suggestions on how procedures can be implemented more smoothly. For instance, staff can make sure procedural language will be intelligible to other local staff and alert policymakers to potential implementation challenges.

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APPENDIX A:
STATE SUMMARIES

SUMMARY OF DOMESTIC VIOLENCE AND CHILD SUPPORT POLICIES IN MASSACHUSETTS

The Massachusetts Department of Transitional Assistance (DTA) and the Department of Revenue's (DOR) Child Support Enforcement Division developed new policies in 1997 in response to PRWORA. DTA issued regulations to implement the federal Family Violence Option (FVO) and grant domestic violence victims, when appropriate, waivers from work requirements, time limits, family cap provisions, and teen-parent school attendance requirements. DTA followed its existing regulations on good cause, which require DTA caseworkers to accept good cause exemption claims, notify DOR when a public assistance recipient has claimed good cause, and determine if good cause exists. DOR issued a good cause policy in 1997, which includes requirements for DOR staff to inform public assistance recipients of good cause exemptions and make referrals to DTA for the exemption determination. DOR also determines whether public assistance recipients are cooperating with child support enforcement efforts.

Boston-area DTA offices are implementing these statewide policies while also testing approaches to identifying domestic violence victims and meeting their safety and child support needs. The federal Office of Child Support Enforcement (OCSE) awarded a Section 1115 grant to DOR in 1997 to conduct the demonstration project, which is operated in close collaboration with DTA. The project has three phases: (1) informing public assistance applicants and recipients of domestic violence issues and good cause exemptions, (2) continuing to inform clients of these topics and also notifying them of the availability of on-site domestic violence experts, and (3) building on the approaches of the first two phases and directly questioning clients on domestic violence.

The following summary describes Massachusetts's policies for helping domestic violence victims to safely pursue child support. We note when the activities of the Boston area demonstration project differ from these policies.

A. STAFF TRAINING

DTA and DOR staff received several types of training on domestic violence to increase their awareness of the issue. DTA received a federal grant in 1997 from the U.S. Department of Health and Human Services to provide statewide training to DTA and DOR staff on the dynamics of domestic violence. In addition, the training new DTA workers receive includes a session on domestic violence issues. Community domestic violence service providers also offer informal training to DTA and DOR staff.

In 1997, DOR developed an agencywide training for its staff and offered the training regionally. The training focused on DOR's new good cause policy and included a video with general information about domestic violence and its effect on children.

B. CLIENT NEEDS ASSESSMENT

DTA caseworkers identify domestic violence victims using a passive notification procedure. The caseworkers give each applicant brochures on domestic violence issues and resources, and then discuss the information with them.¹ This method of identification places the full responsibility for disclosing abuse with clients. If a client reveals to a caseworker that she has experienced domestic violence, caseworkers refer her to a domestic violence specialist or community services.

C. EXEMPTIONS FROM CHILD SUPPORT REQUIREMENTS

DTA caseworkers administer the process of exempting public assistance applicants and recipients from child support cooperation requirements. While both DTA and DOR caseworkers inform clients of the availability of the good cause option, DTA caseworkers accept clients' good cause claims and decide whether to grant the exemptions.

1. Explanation of Good Cause Exemption

DOR and DTA caseworkers inform clients of the good cause exemption from child support cooperation requirements. DTA caseworkers describe the good cause option to clients when they apply or reapply for public assistance or have their eligibility redetermined. The caseworkers also give clients a brochure that includes information on the process of seeking an exemption from child support cooperation requirements. Domestic violence specialists also assist clients by explaining good cause and helping them decide whether and how to make a claim.

At DOR, staff are instructed to tell clients about good cause and safeguards DOR can take if the client indicates that there is or has been domestic violence. The DOR "welcome letter" to public assistance recipients explains good cause and instructs clients to contact DTA to make a claim. DOR staff who speak with clients explain the good cause option and, when domestic violence issues are raised, tell them to contact DTA to apply for the exemption.

2. Good Cause Exemption Claim

DTA caseworkers receive all good cause claims. Child support action on a case usually ceases while a claim is being considered.² Allowable evidence for a good cause claim includes a

¹In the Boston-area demonstration project, some DTA caseworkers directly question clients about domestic violence. If domestic violence victims are identified, they are referred to an on-site domestic violence expert who offers them in-depth assessments and information on community resources.

²Income withholding for a case may continue until a good cause claim is approved if a child support order is already in place.

restraining order, police records, hospital records, and witness statements, but if a client has no other documentation, her own sworn statement is acceptable.

3. Good Cause Exemption Determination

DTA workers determine good cause exemptions within 30 days of a claim, and DTA supervisors approve the decisions. If good cause is granted during the intake process, no case information is sent to DOR and a child support case is not opened. If good cause is granted after intake when a child support case has been opened, the decision is communicated to DOR staff and they close the case.

D. SAFE PURSUIT OF CHILD SUPPORT

DOR indicates that a client is a victim of domestic violence on the state's automated child support system. The system has three types of flags, which are used when a client provides information about a risk of harm: (1) a "family violence indicator" signifies that locating information is not to be disclosed but child support is fully enforced, (2) an "at-risk" indicator signifies that a client receives the "family violence indicator" but with selective enforcement of child support, and (3) a "good cause" indicator signifies that cooperation would put the custodial parent and child in danger and the child support case is closed. If cases are at risk, DOR staff, along with court personnel, can take steps to increase clients' safety. These steps include providing safe places for clients to wait before court appearances that involve their batterers and helping them leave the courthouse safely. Currently, DOR is refining its procedures to keep domestic violence victims safe during the child support process, both when orders are established in court and when they are enforced, which often involves automated action.

SUMMARY OF DOMESTIC VIOLENCE AND CHILD SUPPORT POLICIES IN MINNESOTA

Minnesota's welfare reform initiative, Minnesota Family Investment Program (MFIP), was implemented statewide on January 1, 1998, and offers the state's county agencies new opportunities to address child support enforcement and domestic violence. It provides a process for interagency county committees to exempt domestic violence victims and others determined to have good cause from child support cooperation requirements. MFIP also allows for the referral to supportive services of clients who are identified as domestic violence victims.

In addition to implementing these statewide policies, Hennepin County is testing methods of interviewing public assistance applicants and identifying their needs through a grant from the federal Office of Child Support Enforcement (OCSE). Child support staff in the county are using three methods of conducting interviews after MFIP intake--telephone, video, and in-person--to learn which approach is most effective in increasing child support cooperation and improving the quality of information collected. Specially designated child support caseworkers are screening applicants for domestic violence and other personal issues. If issues are identified, applicants can choose to speak with a resource worker who offers in-depth needs assessment and information on community services.

The following summary describes Minnesota's approach to implementing child support enforcement strategies that address domestic violence in response to federal welfare reform. While statewide policy is discussed, we note when this differs from the procedures of the Hennepin County demonstration project.

A. STAFF TRAINING

To prepare county workers to implement the new domestic violence policies, state legislation mandated that the Minnesota Department of Human Services (MDHS) establish a domestic violence awareness training course for child support and public assistance staff.³ MDHS contracted with Cornerstone Advocacy Services, a domestic violence advocacy organization, to develop the curriculum and conduct the training. The two goals of the training were (1) to increase staff's understanding of the dynamics of domestic violence and how it affects clients' ability to comply with program requirements, and (2) to promote better relationships between agency staff and the domestic violence service providers in their communities. Cornerstone Advocacy Services and its subcontracted domestic violence advocates offered regional training sessions in summer and fall 1999 and included domestic violence providers from each region in the sessions. Counties are now attempting to incorporate elements of the training into their own ongoing training efforts.⁴

³1997 Minnesota Session Law, ch. 203, Art. 9, Sec. 17.

⁴Hennepin County was exempt from the MDHS-sponsored training because it contracted with the Hennepin County Domestic Abuse Service Center to present a similar training for public assistance and child support agency staff.

B. CLIENT NEEDS ASSESSMENT

Public assistance caseworkers do not directly ask MFIP applicants and clients about domestic violence and other barriers to complying with child support enforcement. Instead, they provide information on community service providers during MFIP application and recertification interviews and when making referrals to child support agencies, and they rely on clients to disclose personal issues. If a client chooses to inform a caseworker that she is a victim of domestic abuse, the caseworker can refer her to community providers. As with public assistance caseworkers, child support caseworkers do not directly question clients about reasons for not cooperating with child support efforts.⁵

C. EXEMPTIONS FROM CHILD SUPPORT REQUIREMENTS

Clients with personal needs may be eligible for a good cause exemption from child support cooperation. To receive an exemption, clients must first be aware of the availability of the exemption, submit a written claim of good cause and evidence supporting that claim, and then wait for a determination by a county committee. The following sections describe in greater detail Minnesota's policy for the good cause exemption process.

1. Explanation of Good Cause Exemption

Either the child support or public assistance agency can inform clients of the good cause exemption. Clients usually are notified at a public assistance agency's orientation for MFIP, during a one-on-one intake interview for public assistance, or during a conversation with a child support caseworker. Agencies offer clients information on their right to claim good cause and on the procedure for determining if good cause exists. They also request that clients sign a notice to indicate that they understand the policy.

2. Good Cause Exemption Claim

Clients file a good cause claim by filling out a form and submitting it at a public assistance office. Within 20 days of filing the good cause claim, a client must provide evidence to support the claim. A public assistance supervisor can extend this period if a client needs additional time to gather evidence. Admissible evidence can include a woman's sworn statement as well as such documents as medical or law enforcement records that show a child was conceived as the result

⁵In the second of the Hennepin County demonstration's three phases, child support caseworkers began directly questioning clients on reasons for noncooperation with child support enforcement requirements. The caseworkers, who have volunteered to interview applicants immediately after their public assistance application, conduct a preliminary screening of personal issues. If issues are identified, applicants are asked if they want to speak with a child support resource worker out-stationed at a public assistance office. Resource workers conduct in-depth assessments and make referrals to community services. By the end of the project, all child support caseworkers who do immediate interviewing will also conduct in-depth assessments.

of incest or rape; court documents indicating that legal proceedings for adoption are pending before a court; court, medical, criminal, or other records indicating that the father might inflict physical or emotional harm on the child or parent; and/or sworn statements from a third party.

After receiving the claim, the public assistance agency gives a copy of the document to the client, puts a copy in the public assistance file, and sends a copy to the child support agency. Upon receipt of the claim, the child support agency must suspend all enforcement efforts.

3. Good Cause Exemption Determination

Under MFIP, public assistance agencies remain responsible for administering the good cause determination process, but they must form an exemption determination committee that includes at least one representative from the child support agency. Before this legislative change, public assistance agency staff in most counties determined good cause on their own.⁶ Each county can decide the specific members of the committee. Committee determinations on claims must be made within 45 days of the date a client filed the claim. The good cause committee must review exemptions at least once a year to determine if reasons for noncooperation still exist.

As administrators of the good cause determination committee, public assistance agencies are responsible for taking good cause claims, gathering information pertinent to cases, sharing claims and supporting proof with other committee members, and sending a letter to clients informing them of the good cause decision.

D. SAFE PURSUIT OF CHILD SUPPORT

Minnesota is beginning to develop a policy that would help domestic violence victims pursue child support safely. Officials in the state are currently considering some alternative policy options.

⁶Historically, Hennepin County's good cause determination committee has included representatives from child support and public assistance agencies.

SUMMARY OF DOMESTIC VIOLENCE AND CHILD SUPPORT POLICIES IN MISSOURI

To address the needs of domestic violence victims, Missouri adopted the federal Family Violence Option (FVO) as part of its state Temporary Assistance for Needy Families (TANF) program. This legislative change allows county agencies in Missouri to offer victims of domestic violence needs assessments, referrals to community service providers, and exemptions from cooperation with child support enforcement and other TANF requirements.

Procedures to implement FVO provisions were developed and tested as part of a demonstration project in Jackson County, Missouri, before they were adopted statewide. Missouri's Department of Child Support Enforcement (DCSE) received a Section 1115 grant from the federal Office of Child Support Enforcement (OCSE) to conduct the demonstration project. The project's main activities include the refinement of agency procedures to assist victims of domestic violence, creation of domestic violence screening and assessment protocols, training on new procedures and the dynamics of domestic violence for county staff, use of automated information systems to protect confidentiality, and cultivation of relationships with domestic violence service providers.

The following summary describes Missouri's policies to support domestic violence victims' safe involvement with county child support and public assistance agencies. We note when the state's policy differs from the activities of the demonstration project in Jackson County.

A. STAFF TRAINING

The head trainers from state DCSE and Division of Family Services (DFS) offices and representatives from the Missouri Coalition Against Domestic Violence (MCADV), a domestic violence advocacy organization, designed a cross-agency, two-day training curriculum for county legal, child support, and public assistance agency staff. The goals of the training were to (1) help staff understand each other's new procedures for assisting victims of domestic violence, (2) explain the dynamics of domestic violence, and (3) facilitate relationships between staff at different agencies. DCSE contracted with MCADV to develop the curriculum for the first day of training, which provided a framework for understanding domestic violence issues. DCSE and DFS trainers developed the curriculum for the second day, which featured the agencies' new procedures for assisting domestic violence victims and the flow of service delivery among agencies.

Regional teams of DCSE, DFS, and domestic violence agency trainers offered the training to county agency directors, supervisors, and line staff across the state.⁷ Community-based domestic violence agencies attended the sessions to offer information on their services, lend their perspective on issues, and learn about child support and public assistance agency procedures.

⁷The training was piloted in Jackson County before it was offered statewide.

B. CLIENT NEEDS ASSESSMENT

Public assistance and child support agency caseworkers use uniform interview protocols to (1) screen individuals for domestic violence, and (2) provide in-depth needs assessment. At public assistance agencies, caseworkers conduct a cursory screening of TANF and Medicaid applicants during intake and interim visits to identify victims of domestic abuse. If an applicant or client indicates that she has experienced domestic violence, the caseworker conducts an in-depth assessment. The assessment process collects information on an individual's level of concern for her and her children's safety, ability to engage in work activities, and willingness to cooperate with paternity establishment and/or enforcement of a child support order.

Child support caseworkers primarily are responsible for screening and assessing non-TANF applicants. The caseworkers also assess TANF clients who did not reveal abuse during a public assistance caseworker's screening but disclose it during a child support interview.

Caseworkers from both agencies can refer domestic violence victims to community-based service providers. If an individual indicates she has experienced abuse, caseworkers can refer her to a local shelter and give her a list of domestic violence resources in the community and educational materials. The domestic violence resources are included on a sheet with the title "Food Pantries," so they are not obvious if an abuser finds the sheet.

C. EXEMPTIONS FROM CHILD SUPPORT REQUIREMENTS

A domestic violence victim can learn about, apply for, and obtain a good cause exemption from child support requirements during TANF intake or subsequent visits to the public assistance office.⁸ The exemption process is described in detail below.

1. Explanation of Good Cause Exemption

If responses to questions on the assessment form (described above) indicate that an individual's cooperation with child support enforcement requirements would compromise her safety, the public assistance or child support caseworker performing the assessment explains the good cause exemption.

2. Good Cause Exemption Claim

After explaining the good cause exemption process, a public assistance or child support caseworker asks an individual if she would like to apply for the exemption. If an individual is interested, the caseworker describes the types of evidence required to establish a claim and asks if the individual can provide any documentation. Acceptable evidence for a good cause claim

⁸These procedures were implemented in Jackson County before they were adopted statewide.

includes such documentation as medical records; police records; order of protection; psychological/mental health records; letter from a witness, relative, or friend; and letter from a domestic violence program or shelter. Although caseworkers should try to obtain evidence corroborating a victim's claim of abuse, if no other documentation is available her written statement alone is allowable.

3. Good Cause Exemption Determination

Public assistance agencies appoint staff members to review and decide on good cause claims. Public assistance caseworkers, either during the intake process or subsequent visits, decide on the claims themselves after they complete the assessment form.⁹ Supervisors at public assistance agencies review caseworkers' determinations when information provided to the caseworker is questionable. If an individual informs a child support caseworker that she wants a good cause exemption, she is referred to the public assistance agency designee for a determination on her claim.¹⁰

When a public assistance caseworker grants a good cause exemption, she must notify the child support agency of her determination. The caseworker sends the agency a copy of the screening and assessment forms and an interoffice memo explaining the basis of the decision. If the recipient of the exemption has an open child support case, a child support caseworker closes it.

D. SAFE PURSUIT OF CHILD SUPPORT

Child support and public assistance agencies offer domestic violence victims two primary ways of safely pursuing child support. First, victims can use an address other than their home address for official correspondence with the child support agency. When her child support case is opened, a client receives a written notification that case information can be released to noncustodial parents and is informed of the option to request an alternative address. Second, the state is developing family violence indicators that can be used in county public assistance and child support agencies' automated information systems, as well as criteria for placing a domestic violence flag in the Federal Parent Locator System.¹¹ By helping staff to quickly identify cases with family violence, the indicators increase the safe handling of those cases.

⁹In Jackson County, the caseworker who screens and assesses a client also decides her good cause claim.

¹⁰Some child support caseworkers in Jackson County make the good cause determination.

¹¹The flags and indicators are being developed in conjunction with the Jackson County demonstration.

SUMMARY OF DOMESTIC VIOLENCE AND CHILD SUPPORT POLICIES IN OREGON

Oregon implemented new child support and domestic violence policies statewide in response to provisions of 1996 federal welfare reform legislation. State policymakers created House Bill 3112, and domestic violence advocates, particularly the Oregon Coalition Against Domestic and Sexual Violence (the Oregon Coalition), helped to implement the legislation.¹² House Bill 3112, which became law in June 1997, requires Oregon Department of Human Services' Adult and Family Services Division (AFS) to identify public assistance applicants and recipients who are victims of domestic violence and offer them individualized case management, make referrals to community services, and offer waivers from cooperation with child support enforcement and other TANF requirements.

The following summary describes key aspects of Oregon's domestic violence and child support policies. While the policies are crafted at the state level, local offices have latitude in determining how to provide services. Activities in Grants Pass-Josephine and Medford-Jackson Counties are noted in the summary to illustrate local public assistance and child support offices' approaches to implementing state policy.

A. STAFF TRAINING

Through a 1997 grant from the U.S. Department of Health and Human Services, AFS, the Oregon Coalition, and other domestic violence service providers offered training on domestic violence. The training, which was for local-level AFS, Child Support Program (CSP), and domestic violence service provider staff, included three strategies.¹³ First, an expert trainer developed an advanced curriculum on domestic violence and case management, and then trained staff across the state. Second, a session was conducted to prepare AFS staff and its partners to facilitate non-physical self-defense courses. Third, Ed-net educational broadcasts on closed circuit television, featuring such topics as child support and domestic violence, were televised at community locations statewide. AFS and DCS staff and community partners watched the broadcasts together at community viewing sites, phoned in questions to be answered on the air, and participated in local discussions on the topic after the broadcast.

¹²The Oregon Coalition is a coalition of domestic violence service providers from throughout the state.

¹³In this summary, state-level CSP staff refer to staff at AFS and its contractors, the Oregon Department of Justice's Division of Child Support (DCS) and county District Attorney's (DA's) offices. Local CSP staff refer to staff in local DCS and DA's offices.

In addition to training sessions sponsored by the grant, state-level CSP staff and other AFS staff sponsored their own training to inform staff of new and revised policies on confidentiality and safety concerns, and local agencies collaborated with community domestic violence service providers to design local training on the dynamics of domestic violence.¹⁴

B. CLIENT NEEDS ASSESSMENT

Caseworkers in local AFS branch offices can use two approaches to identify public assistance applicants and recipients who are domestic violence victims. First, applicants fill out Oregon's universal public assistance application, which has three questions that ask about domestic violence and assess an individual's risk of abuse if child support were collected.¹⁵ Second, local AFS offices can develop their own procedures for direct questioning of clients on domestic violence. AFS and the Oregon Coalition created a model assessment tool for AFS caseworkers, and AFS encourages its local offices to refine the tool or develop their own tool in collaboration with their local domestic violence service providers. Once domestic violence victims are identified, AFS caseworkers refer domestic violence victims to community resources.

C. EXEMPTIONS FROM CHILD SUPPORT REQUIREMENTS

AFS caseworkers have a primary role in the process of exempting domestic violence victims from child support cooperation requirement. Both AFS and CSP caseworkers explain the good cause exemption to clients, but AFS caseworkers have sole responsibility for taking good cause claims and deciding whether to grant exemptions. Good cause information is relayed to CSP staff through a shared information system.

1. Explanation of Good Cause Exemption

Clients can learn about the good cause exemption from the TANF application packet, their AFS caseworker, or their CSP caseworker. The TANF application packet includes information on child support cooperation requirements and the availability of good cause exemptions. AFS and CSP caseworkers also describe the good cause exemption during client interviews.

¹⁴In Medford-Jackson, a local domestic violence service provider trained AFS and CSP staff on the dynamics of domestic violence and on how to refer clients to their agency. In addition, CSP staff in the county explain their agency's services and confidentiality procedures to provider staff.

¹⁵In some AFS offices in Medford-Jackson and Grants Pass-Josephine counties, a receptionist reviews completed application packets to discover if domestic abuse is indicated. If so, the receptionist may alert a domestic violence expert, who is stationed at AFS and conducts an in-depth assessment. If abuse is not indicated in the packet, the applicant sees a screener who assesses safety issues and can make referrals to the domestic violence expert.

2. Good Cause Exemption Claim

Clients request good cause exemptions from their AFS caseworkers by completing a request form or by verbally requesting the exemption. Oregon accepts a client's statement as evidence of abuse.

3. Good Cause Exemption Determination

AFS caseworkers decide whether to grant good cause exemptions. When an AFS caseworker makes the determination, he or she informs CSP by entering a code in the computer system. If good cause is granted, CSP staff will not take action on the case.

D. SAFE PURSUIT OF CHILD SUPPORT

Oregon developed a three-tiered approach to protect the privacy and safety of domestic violence victims in the child support system. AFS caseworkers briefly describe these new options to applicants during their intake interview, and CSP caseworkers offer more in-depth descriptions of them to clients.¹⁶

- ***Address of Record.*** Clients with safety concerns but who still want child support can request an address of record.¹⁷ Paternity and child support enforcement action is taken but an address other than a home address is used on legal papers. When an address is more than six months old, CSP caseworkers will send a letter to clients asking them if they want to continue using the alternative address.
- ***Non-Disclosure based on a Claim of Risk.*** Clients with safety concerns who want information in addition to their home address to be held confidential can request non-disclosure based on a claim of risk. Paternity and child support enforcement action is taken, but legal papers, including those that go to the court, conceal not only address but also any other personal identifying information such as phone numbers, driver's license information, and social security numbers. An address of record is required to obtain a claim of risk.

¹⁶DCS staff in Medford-Jackson were stationed at an AFS office to meet with long-term public assistance recipients and inform them of the new confidentiality options. The DCS staff also reviewed the cases of clients who received good cause exemptions to determine if they were still appropriate.

¹⁷The address of record can be used by either party in child support actions, even if domestic violence is not an issue.

- ***Good Cause.*** Clients who feel that child support actions would put them at too great of a risk of incurring violence can request a good cause waiver, and no paternity or child support enforcement action is taken.