

- **Take care of yourself**
- Be curious with yourself and others
- Be present with yourself and others
- **Confidential space - Learning can leave, stories stay. No recording.**
- Embrace collective expertise – no one person knows everything, but together we know a lot
- Be generous with yourself and others; we cannot be articulate all of the time
- We are moving at the speed of trust
- There is more than one way of knowing; there is more than one way of being an expert.





Building a Safer Child Support Program for Survivors:

Findings from the New York Family Safety Questions Pilot Study



What is the SAVES Center?

The SAVES Center is a national resource center (funded by OCSS) aimed at increasing financial independence and stability for domestic violence survivors by providing support related to:

- Child Support
- Parenting Time
- Paternity Establishment



Who is the SAVES Center?

- Division of Child Support Services, Colorado Department of Human Services (DCSS)



- Center for Policy Research (CPR)
- Battered Women's Justice Project (BWJP)
- Centre for Public Impact (CPI)



Why Screen for Safety in Child Support: What we know from past research

- Past research is dated and limited.
- The rate of client DV disclosure depends on:
 - Method of screening
 - Person doing the screening
 - Recency of DV
 - Concerns about being reported to child welfare agencies





New York Family Safety Questions Pilot Overview

- **Purpose:** determine the rate of disclosure of a safety concern by parents in the child support program by providing pre-screening education about safety in child support and testing two different screening forms- behavioral or operational-across 12 district sites
- **Methods:** Districts that were behavioral in Phase I switched to operational in Phase II and vice versa
 - NY SAVES team updated a “getting child support safely” document (LDSS-5228) as an additional resource to support parents in navigating the child support process. All parents were provided this information sheet with the screening form.
- **Timeline:** October 1, 2023 – July 31, 2024
 - **Phase I:** October 1, 2023 – February 29, 2024
 - **Phase II:** March 1, 2024 – July 31, 2024





Screening Tool Design

- Convening child support pilot district staff
- Meeting with public benefits district staff
- Convening survivors in Impact Expert Advisory Groups (IEAG)
- Holding discussions with DV community service providers





Behavioral Versus Operational Questions

- **Behavioral Question Examples (yes/no):**
 - “Using your money or bank accounts to control you”
 - “Emotional abuse (threatening, yelling, mocking you, putting you down, making you think you are crazy, etc.)”
 - “Harassment or stalking (in-person or online)”
- **Operational Question Examples (yes/no):**
 - “Would you be concerned for the safety of yourself or the children if the other parent knew your address, where you work, or how to contact you?”
 - “We may need to schedule genetic testing that could be at the same time and location for both parents. Do you have any safety concerns about meeting together with the children and the other parent?”



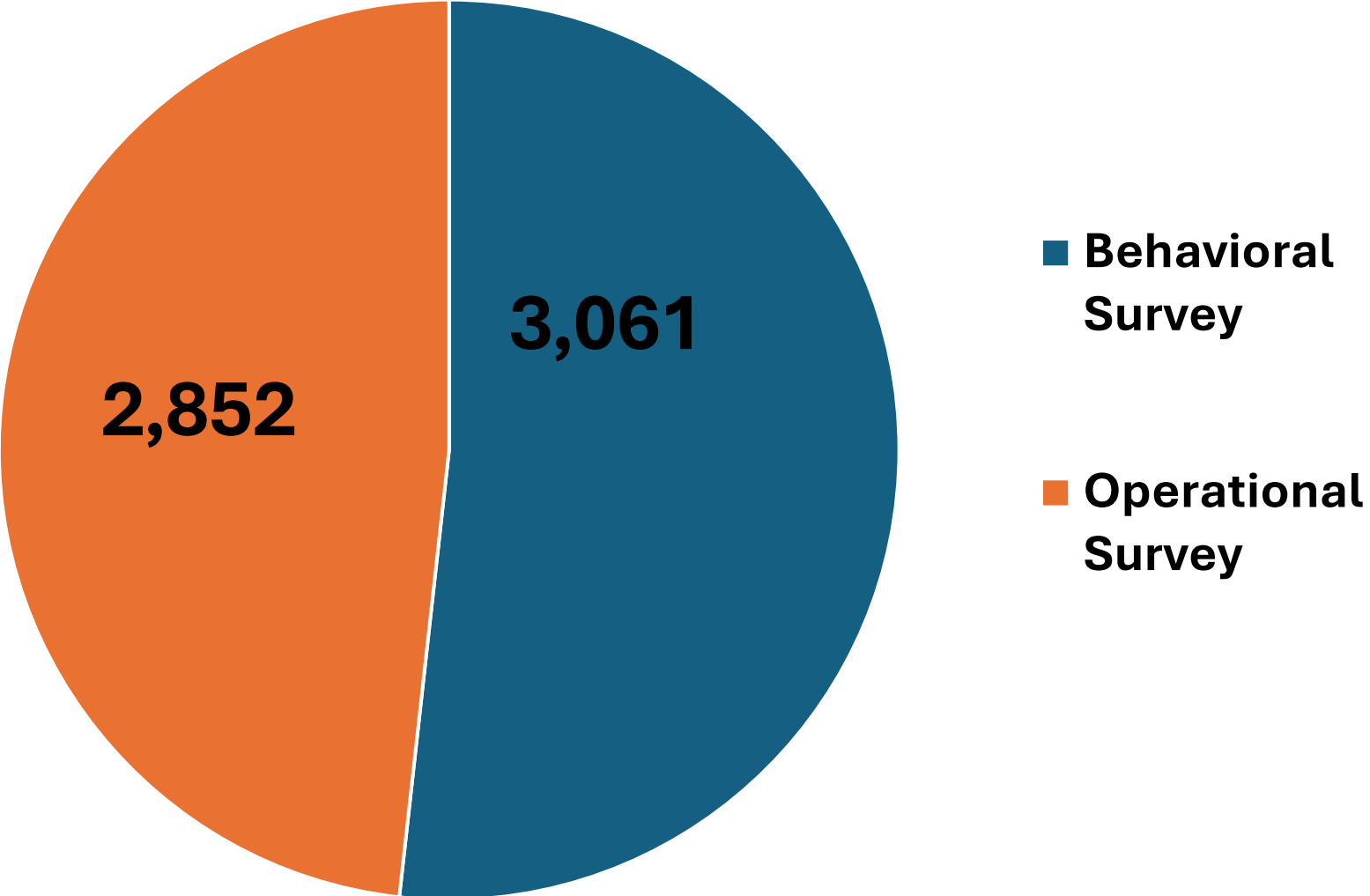
New York Family Safety Pilot

What We Learned and National Implications

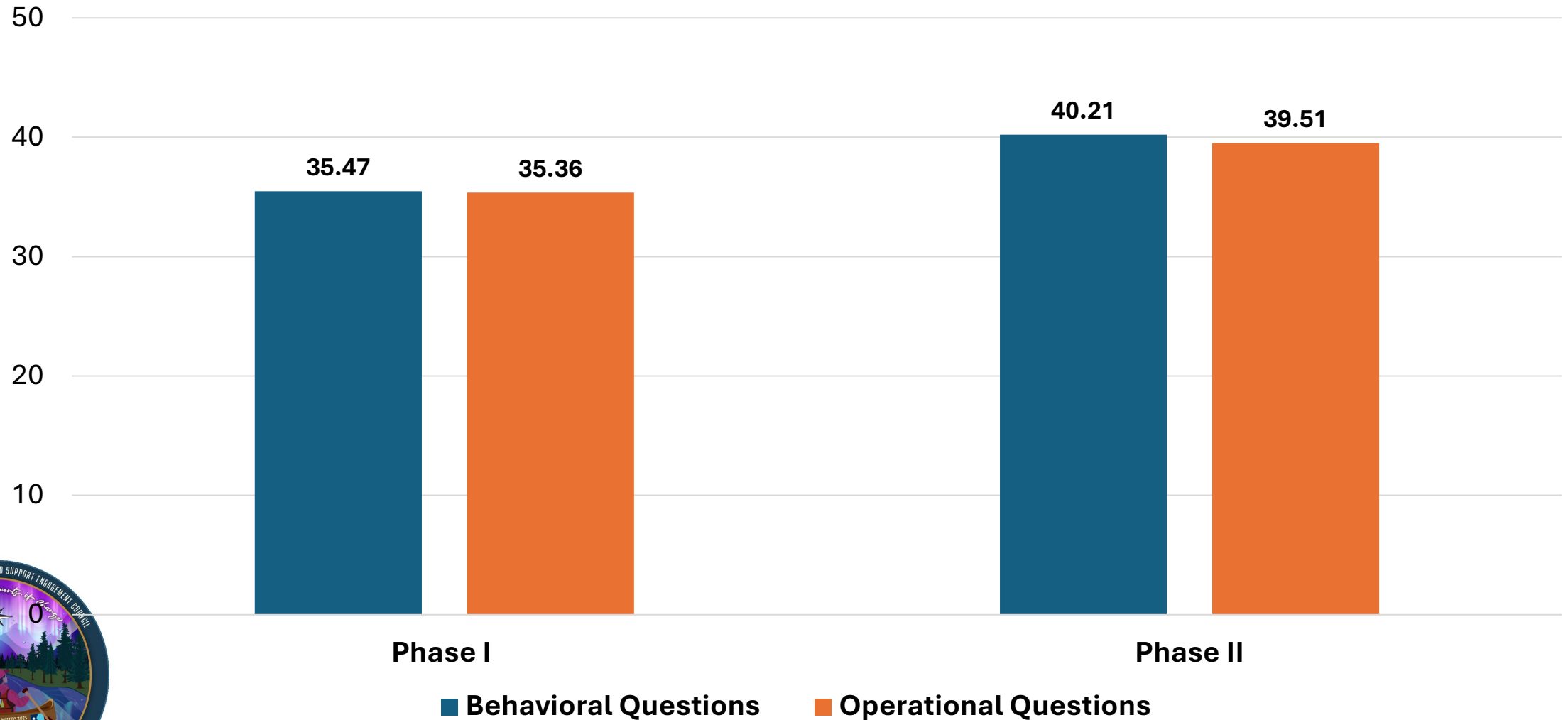
- Research on screening for safety in child support is limited and data.
- A review of 50 states CS applications reveal less than one-third include safety questions
- NY Family Safety Questions Pilot confirmed past results in one of the largest studies to date on screening for safety in CS



Overall Total Screening Tools Completed (N=5,913)



Percent of Screening Tools with at Least One “Yes” Response (Phase I and Phase II)





Statewide Implementation Builds Evidence to Support Screening for Safety in Child Support

- Lessons Learned from NY Pilot:
 - Educate parents about safety in the child support program by providing an information sheet to parents seeking child support services
 - Screening should be routine and universal
 - Direct specific questions yield a 40% disclosure rate
 - First study to support OCSS 2022 Guidance
 - Screening for safety in CS can be implemented on a large-scale statewide basis





Thank you!

Lanae Davis, Senior Research Associate
Center for Policy Research

ledavis@centerforpolicyresearch.org

Centerforpolicyresearch.org | Savescenter.org





MN Safety Assessment Tool

valerie and Jessica

Screening vs. Assessment

- SCREENING

Quick check to *determine if* a problem exists.

Determine whether further evaluation or intervention is needed/required.

Brief and narrow in scope.

Identify the signs and dynamics of DV in a relationship.

- ASSESSMENT:

Provides more complete picture. (Comprehensive)

In-depth, focused, looking at context (nature)

Not to be confused with a risk or lethality assessment

Guide your response

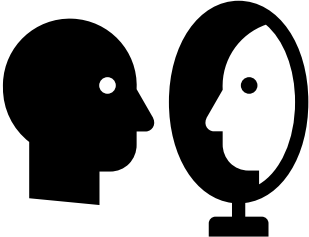




“I stopped answering domestic violence screening questions because no one ever did anything with it when I responded.”
-survivor



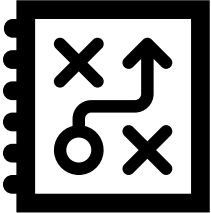
Safety Assessment toolkit



Self-assessment
0-3 Tool



Narrative assessment
conversation guide



Case management
safety plan



Assessment Rating System

IS NOT:

- A document that can be completed and submitted without a conversation.
- Something we are asking the survivors to do “If you have X concern, you need to Y”
- A tool for child support workers to determine if someone meets the criteria or standards of domestic violence
- A lethality or risk assessment

IS:

- An assessment process that starts with a self-assessment to begin the conversation, and ends in identified action steps
- What we do, not what we are asking the survivor to do “If we HAVE this information, WE can do this”
- A tool to identify if someone has safety concerns that need measures in the child support process
- Rating system on proceeding with child support to not proceeding with child support based on concerns



"Let's talk about safety"

Use the zero to three system below to determine what conversation on safety you may want to have with your child support worker



0

I have no fear or safety concerns OR I do not want to disclose at this time.

I do not need any safety measures in the child support process, or what may go in a court order.



1

I have fear or safety concerns about protecting my location and/or managing communication and contact with the other parent.

I would like to proceed with safeguards in place during the process.



2

I have fear or safety concerns about what may go in a court order and may also have concerns protecting my location or managing contact.

I would like to proceed and request safety measures for my court order and may need safeguards in place during the process.



3

I have safety concerns with proceeding or participating in the child support process altogether, and/or have concerns identifying the other parent.

I would like to discuss safety measures and review any options for not proceeding.





Continuum of safety measures



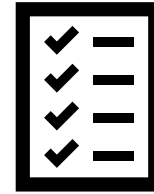


PRISM Changes

- Separate safety from location protection; match rating system
- Safety case-plan case code
- Narrative screen
- Banner



- Parenting Decisions Affidavit
- Pilot child support and legal advocate hotline
- Paternity educational information



- Narrative script
- Safety measures checklist
- Pre-hearing safety prep sheet





Contact Information

MN SAVES: Child Support Division
Department of Children, Youth, and Families

mnsaves.dcyf@state.mn.us





Panelists





Good Cause: PIQ

Michael Hayes



Policies to Promote Safety and Economic Stability for Survivors of Domestic Violence in the Child Support Program

ACF-OCSS-PIQ-25-01

POLICY INTERPRETATION QUESTIONS

ACF-OCSS-PIQ-25-01

DATE: January 14, 2025

“One of the core principles guiding OCSS’s model practices is that child support agencies must not be neutral when it comes to domestic violence. As outlined below, child support agencies must establish and implement policies that protect victims of domestic violence.”



Question 2:

Can the IV-D agency close a case for good cause when the applicant is the noncustodial parent?

Answer 2:

Yes. 45 CFR 303.11(b)(14) is often referred to as the good cause case closure criteria and states:

(b) The IV-D agency may elect to close a case if the case meets at least one of the following criteria and supporting documentation for the case closure decision is maintained in the case record:

(reference PIQ-25-01 Handout)



Question 3: In states where authority to grant good cause is given to the public assistance agency, what case closure code under 45 CFR 303.11 should a IV-D agency use when it has received a referral for child support services from an assistance agency and the IV-D agency has reason to believe it's not appropriate to provide child support services due to family violence safety concerns?

Answer 3: The FEM final rule included a new case closure criterion, 45 CFR 303.11(b)(20), providing states with flexibility to close cases referred inappropriately by the IV-A, IV-E, SNAP, and Medicaid programs. Section 303.11(b)(20) provides states with the option to close cases that are referred from other means-tested assistance programs (in addition to those listed) if the IV-D agency considers it “...inappropriate to establish, enforce, or continue to enforce a child support order in the case and the custodial parent has not applied for services.

(reference PIQ-25-01 Handout)



Question 4: In an intergovernmental case, can the responding IV-D agency close a case using the good cause case closure code if it has reason to believe it's not safe to proceed?

Answer 4: No, the responding state may not use 45 CFR 303.11(b)(14), known as the good cause case closure code, to close an intergovernmental case. Federal law limits a responding state IV-D agency's ability to close a case to the closure criteria under 45 CFR 303.11(b)(17) through (19):

(17) The responding agency documents failure by the initiating agency to take an action that is essential for the next step in providing services;

(18) The initiating agency has notified the responding State that the initiating State has closed its case under § 303.7(c)(11);

(19) The initiating agency has notified the responding State that its intergovernmental services are no longer needed.

(reference PIQ-25-01 Handout)





Contact Information

Michael Hayes
Division of Program Innovation
Office of Child Support Services
michael.hayes@acf.hhs.gov



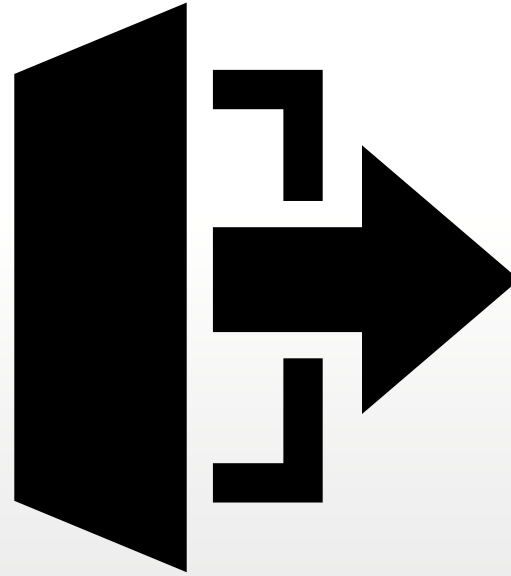


Good Cause: Minnesota

Melissa Froehle

Historical safety
measures

compliance-based



Good Cause Exemption



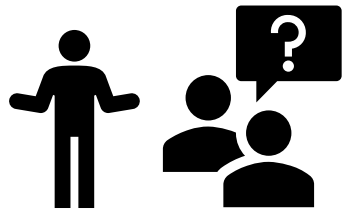
Address Confidentiality
Federal Protect Location



DV Workgroup Inventory

- Information provided:
 - No DV resources or referral on claim form
 - No information on child support services or processes; no information on safety measures in the program
- Processing practices:
 - Unclear practices of notifying participants of good cause; forms are required to be provided, but how this is done and if there are conversations about it varies.
 - Inconsistencies with processing incomplete forms
- Requirements
 - Some “hierarchal” interpretations of evidentiary requirements
 - Differences in accepting written statements and external documentation
 - Notarized form requirement not aligned with penalty under perjury legal practices
 - Yearly redetermination process and new evidentiary requests; differences in documentation needed

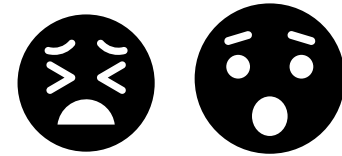




Confusing



Burdensome



Re-Traumatizing





“ Good cause is shrouded in mystery.
It varies from person to person. ”

- advocate





“You should rename good cause
false hope

Good cause gives a false sense of
security. Victims/survivors do not
know what the process is or what
is guaranteed.”

- advocate





“Why do some counties need court records , etc and others don’t?”

- advocate





“Can you give straight-up guidance?”

- advocate





“When I read the form, I thought I had to have every piece of evidence listed on there.

Once I finally had good cause, I ended up applying for Safe At Home because it was easier to keep good cause if I had that. The process to get Safe At Home was easier than trying to get and keep my good cause.”

-Survivor





“I wish there was someone available at the time who could have explained how things would go better and be available for questions and concerns.

My worker appeared to be uncomfortable with DV concerns being shared. “

-Survivor





“After fleeing my state to MN I had to apply for assistance, and on the application I saw a very small box that said something about good cause and if you feel unsafe.

It was the first time I had ever checked a box like that. It didn't say what happens next, or what to expect.

I checked it hoping with all hope something good would come of it.... (cont'd)





“Within a couple weeks I got a call from my abuser, shouting, he got a letter from MN saying they needed child support and he was coming to get us.

When someone turns in your paperwork with that box checked **you should immediately have a conversation with them and discuss the process, and options”**

- Survivor





Good Cause as part of a continuum of safety measures



Guiding Philosophies

- Survivor-centered
- Limit re-traumatization
- Limit burden on survivors
- Improve consistency in determinations
- Streamlined processes
- Improve communication between public assistance and child support agencies



Overhaul Good Cause Statute

Through SAVES, good cause subcommittee has helped create a legislative proposal to make significant changes

- Stream-line decision-making – move good cause into child support
- Update evidentiary requirements consistent with best practices and align with risk of harm case closure
- Update request (claim) process
- Change timelines to support survivor safety
- Change redetermination process to clarify what is needed for redetermination



NUMBER

#25-68-18

DATE

July 9, 2025

OF INTEREST TO

County Directors

Tribal Chairpersons and Tribal
Directors

Financial Assistance Supervisors
and Staff

County Child Support
Supervisors and Staff

Navigators, In-person assisters,
and Certified Application
Counselors

Community Partner Agencies
and Advocates

Good Cause Exemption for Child Support Cooperation Processes, Procedures and Best Practices for Public Assistance Programs

TOPIC

This is a joint bulletin between the Minnesota Family Investment Program (MFIP), Diversionary Work Program (DWP), Child Care Assistance Program (CCAP), Medical Assistance (MA), and Child Support Division on the good cause exemption for child support cooperation processes, procedures and best practices for cooperating with child support requirements.

PURPOSE

This bulletin clarifies the good cause exemption from cooperation with child support policy and disseminates best practices to create consistent procedures to ensure the safety of all parties.





Contact Information

Melissa Froehle, MPA JD

Deputy Director | Child Support Division

MN Department of Children, Youth, and Families

Melissa.Froehle@state.mn.us





Panelists





Q&A

