



Leadership Symposium 2025

TANF Cooperation Requirements

Workshop 203
August 12, 2025
3:45 – 5:00 PM

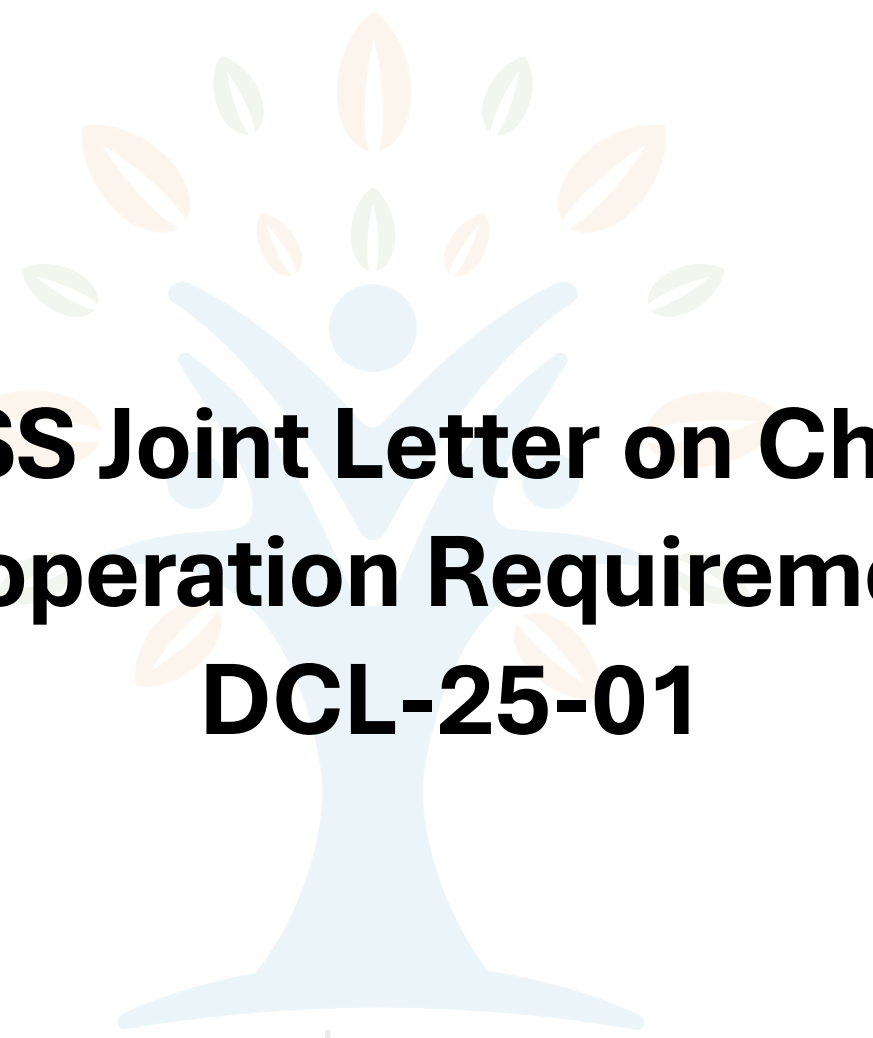


Our Presenters

- Grefonda Tisdale, Establishment Supervisor, Wake County DHHS / Child Support Services
- Michele Cristello, Deputy Commissioner and IV-D Director, Massachusetts Department of Revenue, Child Support Services
- Stephanie Mealy, Program and Policy Analyst-Advanced, Wisconsin Department of Children and Families, Division of Family and Economic Security/Bureau of Child Support
- Nicole Price, Wisconsin Department of Children and Families, Division of Family and Economic Security/Bureau of Child Support
- Rachel Wildfeuer, Ph.D., Research Analyst, Center for Policy Research

Agenda

- Overview of recent joint federal guidance on Cooperation and Good Cause policies (DCL-25-01)
- State Program Activity
 - Massachusetts
 - North Carolina
 - Wisconsin
 - SAVES Center
- Discussion – What are you doing in your program?



**OFA – OCSS Joint Letter on Child Support
Cooperation Requirements
DCL-25-01**

From Foundation to Future

Joint Letter Regarding Cooperation and Good Cause Policies



The federal Office of Child Support Services (OCSS) and the Office of Family Assistance (OFA) issued a joint letter that encourages states to review their requirements “through a lens centered on the child’s safety and well-being.”

OCSS and OFA encourage state TANF and child support programs to review good cause and cooperation policies and utilize existing flexibilities within the federal requirements to be more responsive to the needs of families on TANF and strengthen access to child support.

[OFA – OCSS Joint Letter on Child Support Cooperation Requirements | The Administration for Children and Families](#)



Joint Letter Regarding Cooperation and Good Cause Policies – Areas of Guidance



Caretaker relatives

- States can define “appropriate individuals” and may set standards for cooperation that differ for parents and non-parents.

Intact families and missing parents

- Recommendation to not refer cases where intact families are separated or one parent is missing due to such circumstances out of the family’s control (i.e. political unrest).

Good faith

- Urges states to look at specific circumstances in each case for an individual’s “good faith” effort to cooperate rather than “one size fits all”



Joint Letter Regarding Cooperation and Good Cause Policies – Areas of Guidance



Good cause & other exceptions to cooperation

- Encourages states to consider additional recurring circumstances that might warrant an exception to cooperation

Best interest of the child

- Incorporate a flexible “best interests of the child” standard in the definition of good cause to allow for consideration of individual circumstances

Family violence option under Title IV-A

- Encourage agencies to undertake additional efforts to connect survivors to assistance and reduce barriers



A large, faint background graphic of a tree is centered on the page. The trunk and branches of the tree are formed by light blue hands with fingers spread, reaching upwards. The leaves are represented by various colored shapes in shades of green, orange, and yellow. The text is overlaid on this graphic.

**OFA – OCSS Joint Letter on Tribal Child
Support Cooperation Requirements
TDCL-25-01**

From Foundation to Future

Joint Letter Regarding Tribal Cooperation Requirements



The federal Office of Child Support Services (OCSS) and the Office of Family Assistance (OFA) issued a joint letter that reminds Tribes about the flexibilities they have when establishing or amending Tribal TANF and IV-D plans in supporting family stability.

OCSS and OFA are committed “to supporting tribes so that families overcome barriers and experience greater well-being.”

<https://acf.gov/css/policy-guidance/ofa-ocss-joint-letter-tribal-child-support-cooperation-requirements>



Joint Letter Regarding Cooperation and Good Cause Policies




Tribal TANF Programs

- Can determine whether to require assignment of rights & cooperation requirements
- Can set their criteria for good cause and other exceptions
- Can include NCPs in their definition of “Indian family” and provide services to help them meet their child support obligations

Tribal Child Support Programs

- Flexibility to establish case closure criteria
- Can offer employment and training programs under Final Rule with 100% FFP





Massachusetts
Child Support Cooperation for Relative
Caregivers
Expanding the Definition of Good Cause

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Child Support Requirements – Good Cause



- It is a federal requirement that states attempt to secure child support and establish paternity for all children who receive TANF with exceptions for good cause
- In 1996 states were given the authority to define good cause themselves, with the only restriction being that these must be based on the best interests of the child.
- DCL 25-01 clarifies states may set different standards for parents and non-parents



Relative Caregivers



- Relative caregivers often take over care of children during times of crisis with very little notice, often through probate court or with child welfare involvement.
- These placements keep children with family and out of the foster care system when their biological parents are unable to care for them due to struggles with substance misuse, mental health issues, and other challenges.



Relative Caregivers



- The monthly cash supplement TANF provides for relative caregivers is especially important when the relative caregiver is living on a low or fixed income and had not been expecting to be raising a child.
- Historically, in order to receive the TANF benefit, relative caregivers were required to cooperate in pursuing child support on their own family member.
- While pursuing child support can be a difficult thing for anyone to do, it often hits these caregivers the hardest, with DTA's current exceptions for good cause not fully acknowledging their unique concerns.



Expanded Good Cause for Relative Caregivers



- Massachusetts now provides an exception to cooperation for relative caregivers when it is not in the best interest of the child
- For ease of implementation, it is presented as a good cause reason
- Any relative caregiver who is not concerned about establishing a support order can still do so.
- No verification is necessary for this good cause reason



Expanded Good Cause for Relative Caregivers



- Our TANF agency collaborated with Child Support Services on the changes in the good cause policy.
- Referrals to the child support program from the TANF agency are automated, so CSS clarified system actions under the new policy and the steps CSS would take on any affected cases.



Intact Families and Missing Parents



- Some families, who are eligible for TANF benefits, have come to Massachusetts because of political unrest or violence in their home country. Some of these families are intact but have been separated, with one parent being unable to join the family.
 - TANF benefits are critical for these families to ensure they have the means necessary to get their family situated and stable.
 - MA policy as it relates to these otherwise intact families is that these families would not be referred to CSS and do not fall under cooperation requirements.





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Child Support Cooperation – Work First (TANF)



TANF recipients assign their rights to support when they receive Public Assistance (PA).

Child Support Services (CSS) program is entitled to establish retroactive support owed to the State subsequent to June 30, 1975 (NCGS 110-135).



Child Support Cooperation – Work First (TANF)



As a condition to receive Work First (TANF) benefits, the applicant/recipient:

- Assigns the "rights to support" from any other person on their behalf, or on behalf of any other family member for whom they are applying for or receiving assistance.
 - NCGS 110-137 accomplishes an automatic “assignment of rights” of child support for recipients of TANF for or on behalf of a dependent child up to the amount of benefit that is paid.
- Is required to cooperate in good faith to establish paternity for a child or to establish, modify, or enforce a support order.



Child Support Cooperation – Work First (TANF)



- The Work First program provides a copy of the "Notice Of Requirement To Cooperate And Right To Claim Good Cause For Refusal To Cooperate with Child Support Services" document to families at the time of application and review of Work First assistance.
 - This notice explains the meaning, benefits, and consequences of cooperation and noncooperation. Unless a claim of Good Cause is granted, recipients must cooperate fully with CSS in all Public Assistance (PA) cases that they have with CSS.



Good Cause – Work First (TANF)

- Recipients who believe that cooperation would be detrimental to the child can make a claim of Good Cause to the Work First or CSS agency.

The Work First case workers evaluate the claim, determine whether or not Good Cause exists based on the best interest of the child, and within five (5) business days of the determination, notifying CSS of the decision.



Evidence of Good Cause – Work First (TANF)

1. The applicant/recipient's cooperation in establishing paternity and support is reasonably anticipated to result in:
 - a. Physical or emotional harm to the child for whom support is being sought; or
 - b. Physical or emotional harm to the CP that could result in the inability to adequately care for the child.

2. Proceeding to establish paternity or support would be detrimental to the child for one of the following reasons:
 - a. The child for whom support is sought was conceived as a result of incest or rape.
 - b. Legal proceedings for the adoption of the child are pending before a court of competent jurisdiction; or
 - c. The applicant/recipient is currently being assisted by an agency to decide whether to keep the child or relinquish him/her for adoption, and the discussions have not gone on for more than three (3) months.





Wisconsin

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Child Support Good Cause and Noncooperation



- Good Cause and Noncooperation: As a condition of eligibility, any custodial parent who applies for or is receiving assistance from W-2/TANF, Foster Care, and Medicaid must cooperate with the child support agency (CSA) in establishing paternity and obtaining child and/or medical support.
 - May claim good cause for refusing to cooperate with the CSA. In this instance, the individual feels that cooperating with the agency would not be in the child's best interest because of physical or emotional harm to the child(ren) or to the parent.
 - In WI CSAs decide noncooperation and TANF (W-2) agencies determine whether noncooperation is a product of good cause



Child Support Good Cause and Noncooperation



- What is WI Doing?
 - Released a statewide Child Support Letter Pertaining DCL 25-01. A commitment to analyzing policy and guidance to counties surrounding the following areas:
 - Family Violence Indicator (Privacy Protection)
 - Case Closure Requirements
 - Location and Identity Protection
 - Protective Orders
 - Child Support Process Modifications
- Challenges/Opportunities



Child Support Good Cause and Noncooperation



- Wisconsin found opportunities
 - Wisconsin research performed analyzing the number of WI cases placed in noncooperation status
 - Reviewing the reasons why CSAs placed participants in a noncooperation status and why
 - Reviewing noncooperation policies to provide more streamlined guidance



- Wisconsin- SAVES Grant
 - WINS- Wisconsin's Network for Safety



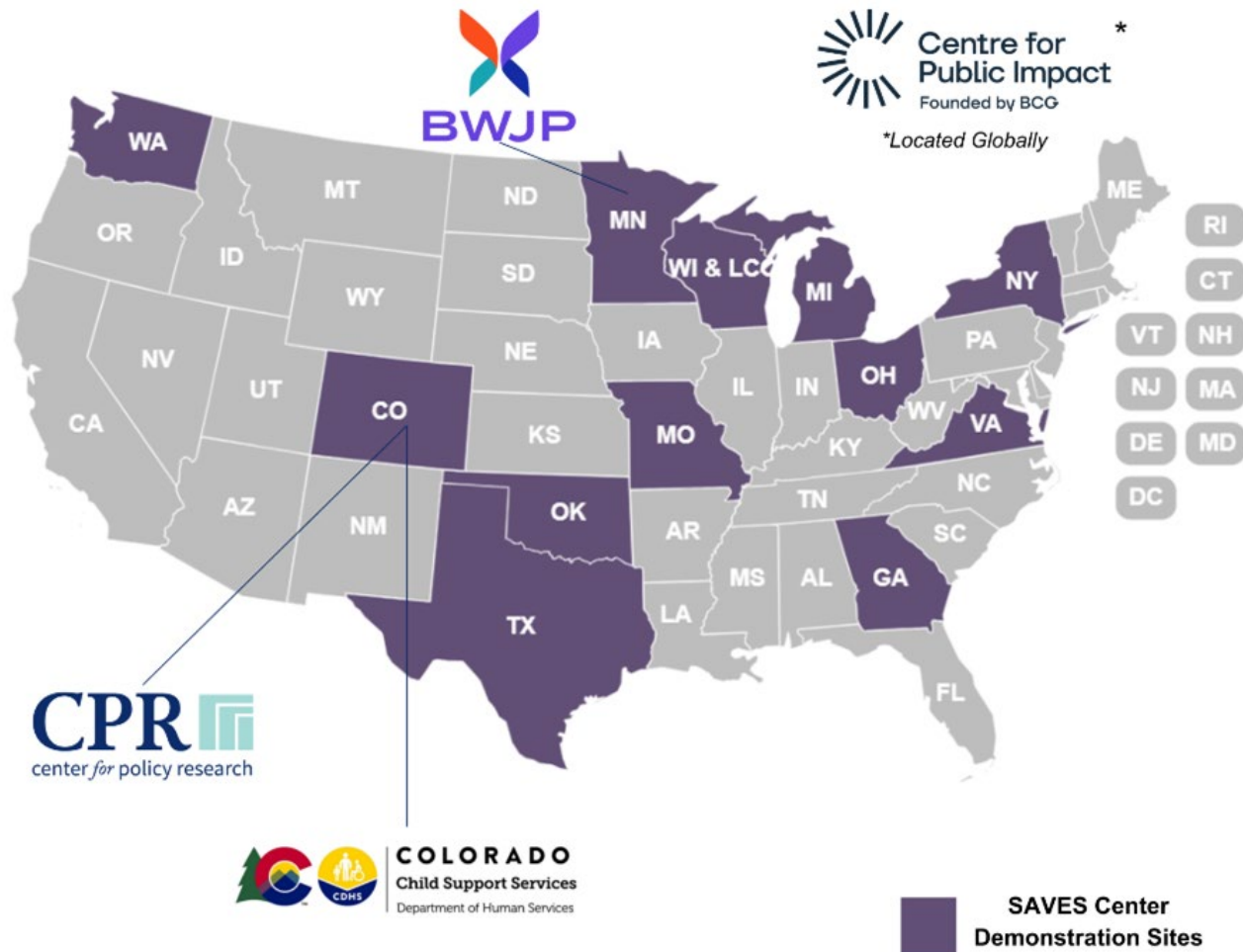
SAVES Center

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SAVES Center

- National resource center, funded by the federal Office of Child Support Services (OCSS)
- Works to increase safe access to child support, parenting time, and establishment of paternity services for survivors of domestic violence
- Works with the 13 SAVES demonstration sites (12 state and one tribal child support programs) and the national child support program
- info@savescenter.org

SAVES Demonstration Sites



Patterns at SAVES Demonstration Sites

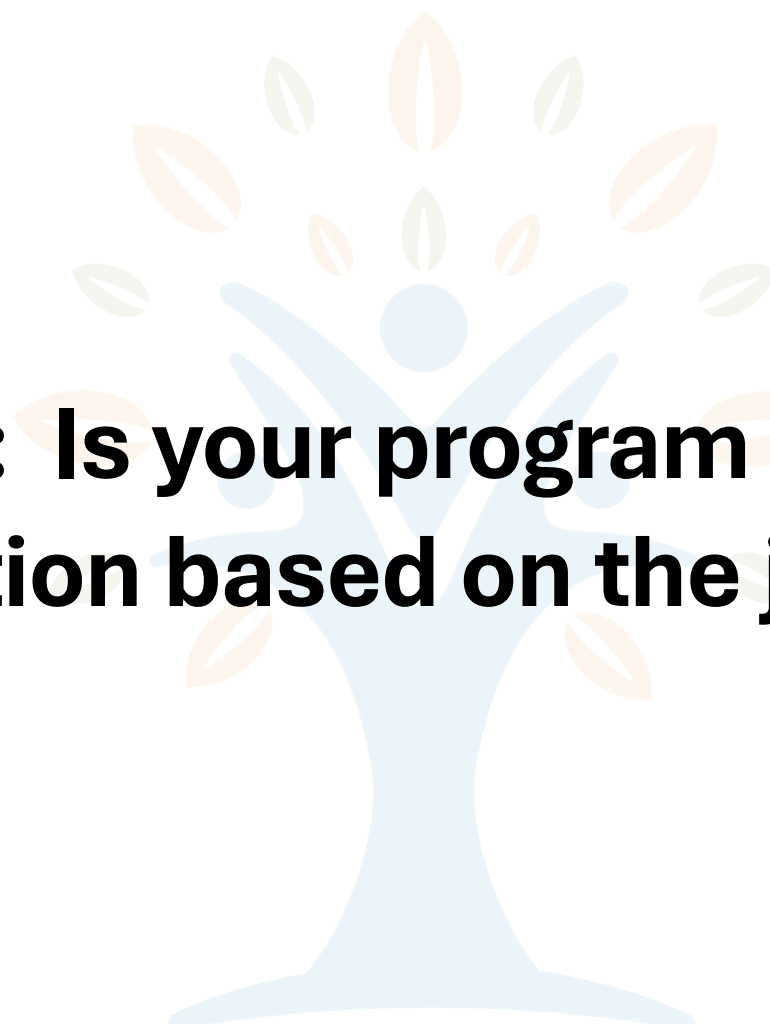
- Eligibility for good cause
- Documentation to determine good cause



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Activities at SAVES Demonstration Sites

- Joint bulletin on good cause
- Cross-agency workgroup with child support and TANF staff
- Better understanding of existing good cause practices and how they may vary by county
- Specialized staffing arrangement to better facilitate the good cause process



Discussion: Is your program thinking about or taking action based on the joint guidance?

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THANK YOU!