

ACF Administration for Children and Families	U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES	
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INFORMATION MEMORANDUM

TO: States, Tribes and Territories Administering the Temporary Assistance for Needy Families (TANF) Program and State, Tribal and Territorial Agencies Administering or Supervising the Administration of Titles IV-B and IV-E of the Social Security Act (the Act)

SUBJECT: Data sharing between TANF and child welfare agencies

LEGAL AND RELATED REFERENCES: Sections 402(a)(1)(A)(iv), 471(a)(8) and 474(a)(3)(C) of the Social Security Act; and 45 CFR 1355.30

PURPOSE: This Information Memorandum (IM) provides information to TANF agencies authorized under title IV-A of the Act and child welfare agencies authorized under titles IV-B and IV-E of the Act to encourage them to coordinate, collaborate, and share data on the children, youth, and families that they serve.

BACKGROUND: TANF programs and title IV-B/IV-E agencies (child welfare agencies) often serve an overlapping population. TANF focuses on promoting the economic self- sufficiency of families with children, while child welfare agencies focus on ensuring that children are safe and grow up with stable, caring, permanent families. For example, a TANF program may provide financial assistance to a child living with a relative caretaker as a “child only” case, while the family also receives supportive child welfare services. While both systems share a common mission of ensuring the well-being of children and families and sometimes serve the same families, it is important for both policymakers and caseworkers to understand that living in poverty and qualifying for TANF does not equal neglect, and caseworkers should consult their state’s definition of neglect if they have concerns about possible child maltreatment. Through improved data sharing and collaboration, TANF and child welfare agencies can improve their effectiveness in meeting their respective missions and, more importantly, the needs of the children and families that they serve.

Under title IV-E of the Social Security Act, agencies that receive federal funding to develop a comprehensive child welfare information system known as the Statewide Automated Child Welfare Information System/Tribal-wide Automated Child Welfare Information System (S/TACWIS) are required to the extent practicable to develop an interface with the information system used by the state’s or tribe’s TANF program in order to exchange relevant client data

(section 474(a)(3)(C) of the Act). However, some states and tribes have not developed robust data exchanges between their TANF and S/TACWIS child welfare information systems, sometimes citing privacy concerns as a barrier to information exchange. We are not promoting automatic referrals between the two systems but rather data sharing that promotes coordination and improved service delivery.

Since 2006, both the Children's Bureau and the Office of Family Assistance have promoted various initiatives to improve coordination and collaboration between child welfare and TANF agencies. The Children's Bureau funded five grant opportunities to demonstrate models of effective collaboration between child welfare and TANF agencies to improve outcomes for children and youth who are in, or are at risk of entering, the child welfare system.

The evaluations of the results of these initiatives showed that improvements in coordination between child welfare and TANF systems provide benefits for families receiving such services as well as the agencies providing them. Some examples of the findings are:

- Compared to receiving only child welfare or TANF services, participants who received services from the collaboration of the two agencies showed statistically significant pre- to post-test improvements in the domains of environment (e.g., housing stability, income/employment, and food and nutrition), parental capabilities, family interactions, family safety (e.g., child abuse, domestic violence), child well-being (e.g., school behavior, mental health, relationships), readiness for reunification, and reductions in caregiver and child ambivalence.
- Promising trends were found in statewide data related to lower recurrence of substantiated maltreatment, success in resolving TANF sanctions, and reductions in time receiving cash aid.
- Mothers receiving services saw the program as beneficial in helping them navigate child welfare and TANF systems and perceived improvements in their parenting and child development knowledge.
- Participants reported decreased levels of stress at case closure as indicated on a comprehensive family assessment tool.

Most recently, the Children's Bureau funded grants under the authority of the Family Connections Grants program to support Kinship Navigator programs focused on collaborations between child welfare and TANF agencies. The Kinship Navigator Programs are designed to assist kinship caregivers in learning about and linking to programs and services to meet the needs of the children they are raising as well as their own needs. The Office of Family Assistance has funded Tribal TANF and child welfare coordination grants to improve case management for families eligible for Tribal TANF assistance; to provide supportive services and assistance to tribal children in out-of-home placements; and to offer prevention services and assistance to tribal families at risk of child abuse and neglect.

Cross-training and information sharing have proven to be effective strategies among grantees. Grants have promoted cross-training between agencies for staff to better understand the other agency's goals, services, policies, and programs and to recognize their shared objectives in supporting families. Cross-training has provided opportunities for increased learning about agency policies, thresholds for referrals, and appropriate services available to particular families.

As a result, staff gained new knowledge and developed relationships with partnering agency staff. Several projects worked to develop new policies, procedures, and practices that promoted integrated service delivery. These programs ensure that child welfare and TANF agency workers are aware of the services and supports available in each other's programs, and that only appropriate referrals are made. We believe that increased coordination, collaboration, and data sharing will improve services for children, youth, and families in both systems.

INFORMATION: We remind states, tribes, and territories administering TANF that they are permitted under federal law to determine their own confidentiality rules regarding the safeguarding and disclosure of client information.¹ Federal law requires only that TANF jurisdictions will “[t]ake such reasonable steps as the State deems necessary to restrict the use and disclosure of information about individuals and families receiving assistance under the program attributable to funds provided by the federal government (section 401(a)(1)(A)(iv) of the Act).” Such rules allow for data sharing between TANF and state or tribal child welfare agencies, regardless of whether the state or tribe has implemented a S/TACWIS or non-S/TACWIS application to support their child welfare case practice model, as there are no statutory or regulatory barriers to doing so.

We also remind title IV-B and IV-E child welfare agencies that there are no specific federal barriers to child welfare agencies exchanging information with TANF agencies. State and tribal child welfare agencies must adhere to specific confidentiality requirements when administering the title IV-B and IV-E programs, but federal statute and regulations for titles IV-B and IV-E allow agencies to disclose confidential information if the disclosure is limited to the specific purposes enumerated in the law (section 471(a)(8) of the Social Security Act and 45 CFR 1355.30(p)(3)). This includes purposes related to the administration of TANF. It is important to note that under the title IV-B and IV-E confidentiality requirements, authorized recipients of this otherwise confidential information are subject to the same confidentiality standards as the agencies administering the title IV-B/IV-E programs.

Information sharing between TANF jurisdictions and child welfare agencies will foster coordination and collaboration and maximize the resources and services available to families served by both programs. For example, TANF workers may have access to different family contact information than a child welfare agency has, which can help a child welfare worker locate relatives who may be able to provide a temporary or permanent home for a child at risk of being removed from his or her home or who is placed in foster care. Data sharing will also allow TANF workers to identify if a family is being served by the child welfare agency and therefore prevent duplicative services.

By sharing information, agencies can better coordinate service provision and meet case plan requirements, helping families successfully meet the requirements and goals of both programs. For these reasons, ACF encourages TANF jurisdictions and child welfare agencies to have policies and procedures in place for the appropriate disclosure of client information. In order to address confidentiality concerns from families and staff about agencies sharing client data, we

¹ A TANF agency is permitted to define its own confidentiality rules, and states must take into consideration the Child Abuse Prevention and Treatment Act mandatory reporter requirements.

encourage states and tribes to consider informing individuals when disclosing their information to another agency.

INQUIRIES: TANF or Children’s Bureau Regional Program Managers

_____/s/
Rafael López
Commissioner
Administration on Children,
Youth and Families

_____/s/
JooYeun Chang
Associate Commissioner
Children’s Bureau

_____/s/
Nisha Patel
Director
Office of Family Assistance

Attachment A: TANF Regional Program Managers

Attachment B: Children's Bureau Regional Program Managers