ACTION TRANSMITTAL

AT-12-01

DATE: June 18, 2012

TO: State Agencies Administering Child Support Enforcement Plans under Title IV-D of the Social Security Act and Other Interested Individuals

SUBJECT: Turner v. Rogers Guidance

CONTENT:

I. *Turner v. Rogers* Overview

In June 2011, the United States Supreme Court decided the case of *Turner v. Rogers*.[1] The question in *Turner* was whether the due process clause of the 14th Amendment of the U.S. Constitution requires states to provide legal counsel to an indigent person at a child support civil contempt hearing that could lead to incarceration in circumstances where the custodial parent or opposing party was not represented by legal counsel.[2] The United States Supreme Court held that under those circumstances, the state does not necessarily need to provide counsel to an unrepresented noncustodial parent if the state has "in place alternative procedures that assure a fundamentally fair determination of the critical incarceration-related question, whether the supporting parent is able to comply with the court order." [3]

The Supreme Court in *Turner* specifically left unresolved the question of what due process protections may be required where: (1) the other parent or the state is represented by an attorney; (2) the unpaid arrears are owed to the state under an assignment of child support rights; or, (3) the case is unusually complex. Accordingly, this guidance, directed to state child support agencies (and prosecuting attorneys funded with title IV-D funds), is based upon the due process considerations expressed in *Turner*. This AT is not designed to define for IV-D agencies what is constitutionally required when there is a IV-D attorney or representative participating in the civil contempt hearing that may lead to incarceration. However, using *Turner* as a guidepost, this AT urges state IV-D agencies to implement procedural safeguards when utilizing contempt procedures to enforce payment of child support and encourages IV-D agencies to individually screen cases prior to initiating or referring any case for civil contempt.

In 2003, Mr. Turner, the noncustodial parent, was ordered to pay $51.73 per week in child support. Over the course of several years, he was held in civil contempt for nonpayment on five occasions and was incarcerated on several occasions. In South Carolina, each month the family court clerk identifies child support cases in which the obligor has fallen more than five days behind and automatically initiates a civil contempt hearing.[4] In 2008, under the facts giving rise to this lawsuit, Mr. Turner was held in civil contempt and served a 12-month jail term. At the hearing, Mr. Turner was not

represented by counsel, nor was a IV-D attorney involved. In ordering that Mr. Turner be jailed, the lower court did not make any findings on the record regarding Mr. Turner's ability to pay the entire arrears amount, which the court set as the purge amount. Mr. Turner subsequently appealed alleging that his rights were violated because the due process clause of the 14th Amendment required the state to provide him with appointed counsel in a civil contempt hearing that could lead to incarceration.

In *Turner*, the United States Supreme Court held that a state does not need to automatically provide counsel to a defendant in a child support civil contempt proceeding, under the specific facts of the case, as long as the state provides adequate procedural safeguards. In *Turner*, neither the state nor the custodial parent were represented by legal counsel. The *Turner* Court indicated that adequate substitute procedural safeguards might include:

- Providing notice to the noncustodial parent that "ability to pay" is a critical issue in the contempt proceeding;
- Providing a form (or the equivalent) that can be used to elicit relevant financial information;
- Providing an opportunity at the contempt hearing for the noncustodial parent to respond to statements and questions about his/her financial status (e.g., those triggered by his/her responses on the form declaring financial assets); and
- Requiring an express finding by the court that the noncustodial parent has the ability to pay based upon the individual facts of the case.

The *Turner* Court concluded that, used together, these four procedures would have been sufficient to meet minimum due process requirements under the circumstances of the case where neither the custodial party nor the state was represented by counsel. The Court emphasized that these four procedures are not an exclusive list, and there may be other pathways to satisfying minimum due process requirements in similar proceedings. This remains an evolving and uncertain area of constitutional law, and states are encouraged to carefully review their own civil contempt procedures and consult with their attorneys to determine appropriate minimum due process protections warranted where incarceration is a possible outcome.

II. State Contempt Practices

Title IV-D agencies are bound to ensure that noncustodial parents receive due process protections.[5] The federal government has an interest in ensuring that the constitutional principles articulated in *Turner* are carried out in the child support program, that child support case outcomes are just and comport with due process, and that enforcement proceedings are cost-effective and in the best interest of children. Accordingly, this guidance is directed to state and local IV-D agencies and prosecuting attorneys funded with IV-D matching funds.

Child support civil contempt practices, including the right to appointed counsel in certain proceedings, vary considerably from state to state.[6] For example, some state child support

agencies rarely, if ever, bring civil contempt actions, and many states provide for legal counsel in a civil contempt action when it can lead to incarceration. In light of *Turner*, states continue to have latitude in determining the precise manner in which the state implements due process safeguards in the conduct of contempt proceedings, including the respective roles of the IV-agency, prosecuting attorneys, and court. It should be noted, however, that when there is a IV-D attorney or state representative participating in the civil contempt proceeding, even the procedural safeguards identified in the *Turner* case may not be sufficient to satisfy due process requirements in all cases.

Using *Turner* as a guidepost may be useful, however, as states review their civil contempt procedures. OCSE strongly recommends that IV-D agencies consult their attorneys concerning their existing practices, including notices, in light of the *Turner* decision. States should consider whether the procedures employed in the state's contempt practice are fundamentally fair, and whether additional procedural safeguards should be implemented to reduce the risk of erroneous decision making with respect to the key question in the contempt proceeding, the noncustodial parent's ability to pay.

This guidance identifies minimum procedures that IV-D programs should consider in bringing child support civil contempt actions that can lead to incarceration. At the same time, this guidance is not intended to prohibit the *appropriate* use of contempt. The issue is not the use of contempt procedures *per se*, but contempt orders that do not reflect the true circumstances of the noncustodial parent, and if not satisfied, can lead to jail time. Some states routinely use show cause or contempt proceedings to elicit information from the noncustodial parent, and jail is not a typical outcome. Other states have redirected their enforcement resources away from civil contempt to practices that encourage voluntary compliance with child support orders, such as setting realistic orders through early intervention programs when the noncustodial parent falls behind.[7] Civil contempt proceedings may also be used to direct certain actions by the obligor, such as obtaining or maintaining employment or participating in job search or other work activities. Due process protections, where incarceration is not a possibility, may be quite different depending upon individual case circumstances.

III. Distinguishing Between Civil and Criminal Contempt

Contempt is commonly understood as conduct that intentionally defies a court order, and which may be punishable by a fine or incarceration. The Supreme Court recognized a distinction between civil contempt and criminal contempt, which have different purposes and require different constitutional protections. Criminal contempt is punitive in nature, designed to punish a party for disobeying a court order. Defendants in criminal contempt cases are entitled to the protections of the Sixth and Fourteenth Amendments, including the right to counsel.

A civil contempt proceeding, on the other hand, is remedial and is designed to bring about compliance with the court order – "'to coerc[e] the defendant to do' what a court had previously ordered him to do."[8] Incarceration for civil contempt is conditional, and thus any sentence must include a purge clause under which the contemnor would be

released upon compliance. As noted in *Turner*, under established Supreme Court principles, "[a] court may not impose punishment in a civil contempt proceeding when it is clearly established that the alleged contemnor is unable to comply with the terms of the order."[9] Because once the civil contempt is purged the contemnor is free to go, it is often said that the contemnor "carr[ies] the keys of [his] prison in [his] own pockets."[10]

In the child support context, it is conceivable that either proceeding may be warranted, but ability to pay commonly "marks a dividing line between civil and criminal contempt."[11] A finding of civil contempt for failure to pay support typically requires that an obligor has been subject to a support order, was able to comply with the order, and failed to do so. Although state statutes vary in setting forth the elements of civil contempt, many civil contempt statutes require that the underlying order was willfully, or intentionally, violated. The *Turner* Court also suggested that an express finding that the obligor has the actual and present ability to comply with the court's purge order may be required prior to sentencing the contemnor. In other words, the obligor "must hold the key to the jailhouse door," whether it is satisfying a purge payment, participating in an employment or substance abuse treatment program, or other required actions.

IV. Using Civil Contempt in Child Support Cases in Which Ability to Pay is at Issue

A. Screening Cases Before Referring or Initiating Civil Contempt Proceedings that Can Lead to Incarceration

Turner highlights the importance of carefully screening cases prior to initiating contempt proceedings. Child support agencies should re-examine state and local policies and practices regarding civil contempt to ensure that obligors are afforded sufficient due process protections and that initiation of civil contempt proceedings is appropriate. This includes an assessment of the screening mechanism used by child support agencies before referring a case for prosecution or initiating or filing a request for an order to show cause or other contempt action that can lead to incarceration. Whether or not the state provides appointed counsel in civil contempt proceedings, effective screening to identify appropriate contempt actions will save child support program costs, preserve scarce judicial resources, avoid unnecessary court hearings, and avoid the risk of constitutional violations.

All IV-D programs are urged to screen cases before referring, initiating, or litigating any civil contempt action for non-payment of support that could lead to incarceration, regardless of the role of the IV-D program in the court action. Generally, a "show cause" or other contempt action should only be initiated in these cases where there is evidence of the noncustodial parent's ability to comply with the underlying child support order and evidence that there is actual and present ability to pay the purge amount ordered.

Agency screening procedures should include the following elements:

(1) cases should be individually reviewed;

(2) the individual review should include an assessment as to whether there is sufficient evidence of the obligor's ability to pay the underlying child support order at the time a payment was due and the obligor's actual and present ability to comply with the requested remedy in a civil contempt proceeding, i.e., pay the purge order amount, or participate in an employment program, or other required activities.

1. Cases Should Be Individually Reviewed

IV-D agencies are encouraged to consider the obligor's individual circumstances. Therefore, a screening process, whether automated or manual, that identifies a case for contempt proceedings based solely upon the obligor's failure to pay (e.g. a threshold amount or period of arrears) may often result in the state's inability to show willfulness. State laws may vary as to whether it is the obligor's primary burden to "show cause" why he or she should not be held in contempt, or whether the state must first present a *prima facie* ("on its face) case sufficient to warrant a finding of contempt. While states may use automation to identify such obligors who are *potentially* eligible for a civil contempt case, wherever possible the IV-D agency should also make an inquiry into the actual and present circumstances of the individual obligor before initiating contempt.

2. The Individual Review Should Examine Actual and Present Ability to Comply

The child support agencies should only pursue a civil contempt action leading to incarceration when there is: 1) *prima facie* evidence, or a good-faith basis to believe, that the obligor willfully violated the underlying child support order, *i.e.* the obligor had the ability to pay the order, but did not do so; and 2) the obligor has an actual and present ability to comply with the purge order. The purge amount may be the full amount of child support arrears, or a lesser amount, or a schedule of payments the noncustodial parent is required to make in order to pay the full amount of arrears. The fact that there are overdue payments on an existing support order should not, standing alone, usually be considered sufficient to result in an order of incarceration. Screening for actual and present ability to pay is especially important when the underlying support order amount is based on imputed income.

To the extent possible, the screening should be based upon current data or information. For example, IV-D programs could use data from the National Directory of New Hires or the State Directory of New Hires to ascertain whether the individual has any record of employment and income and Financial Institution Data Match (FIDM) information to ascertain whether the individual has available funds in any accounts in a financial institution (other than SSI or other needs-based income). Additionally, custodial parents may provide information on income or assets or circumstantial evidence of the obligor's income and assets may be available from other sources.

If the screening process reveals that the obligor does not have an appropriate support order based upon the obligor's ability to pay, the IV-D agency should conduct a review and adjustment of the order or provide information to the obligor about requesting review and adjustment upon proper notice to the parties.

B. Notice Should Be Provided to the Obligor that "Ability to Pay" is a Critical Issue in the Contempt Proceeding

The four criteria identified in the *Turner* case, though not necessarily sufficient to satisfy due process requirements where the custodial parent is represented or the state IV-D agency is involved in the case, provide insight into minimal due process protections that should be observed. The four criteria, taken together, may be sufficient in most circumstances, but states may also have additional or other protections that guarantee due process. States may use the *Turner* decision as a guide in determining the appropriate procedural safeguards necessary in IV-D civil contempt hearings. At a minimum, states should provide the noncustodial parent with specific notice about the hearing.

Notice that is sufficient to inform the obligor of the critical nature of the proceedings is the essential first criterion to assure due process. In *Turner*, the Supreme Court indicated that noncustodial parents charged with civil contempt must be given written notice that ability to pay will be a critical issue in the contempt proceeding. A IV-D agency should include this notice provision in its contempt process, for example, a statement that the court will consider evidence of inability to pay. Such a notice typically also includes an order to appear at a specific date, the amount of the claimed arrears, the dates during which the arrears accrued, and notice that a finding that the obligor willfully failed to pay support may lead to incarceration. The exact language should be clear, simple, and concise. Because this notice should be designed for obligors without legal representation, the notice should be written plainly and not use complicated legal language.

When providing the required notice, IV-D agencies may want to use this opportunity to provide information to, or elicit additional information from, the person charged with contempt. For example, they may enclose forms designed to obtain current financial information, and to inform the obligor that he should bring specific information to the civil contempt hearing or that he may have an opportunity to submit financial information in advance of the hearing. IV-D agencies may want to consider implementing a face-to-face meeting or conference with the obligor in advance of scheduling a contempt hearing. Additionally, IV-D agencies may wish to provide information about legal resources available to the noncustodial parent, such as self-help centers, legal services programs or pro bono attorneys, or legal representation projects that provide assistance to noncustodial parents in child support matters.

Some child support agencies may be required to use a contempt notice approved by the court, including a standardized Order to Show Cause notice applicable to all types of cases, not just child support cases or matters where ability to pay is at issue. In these situations, the IV-D agency could lend its expertise in developing new forms specifically for child support civil contempt cases or assist in developing an addendum with specific notice provisions applicable to child support contempt proceedings that can be attached to the notice. For example, following the *Turner* decision, a number of child support agencies have worked closely with their judiciary or with their state or local Access to Justice Commissions to develop new notice materials and other appropriate procedural safeguards for unrepresented litigants.[12]

Turner did not address the questions of whether notice of the proceedings should be provided to custodial parents or whether they should have an opportunity to participate in such proceedings. State practices vary on the level and type of notice provided to custodial parents (who are frequently not a party to the proceeding). Nevertheless, states may wish to inform custodial parents of the civil contempt proceeding. For example, the custodial parent may have information on the noncustodial parent's ability to pay. Some local IV-D offices have had success in routinely involving both parents in an informal conference early in the case and thereafter.

C. Judicial Procedures Should Provide an Opportunity to Be Heard on the Issue of Ability to Pay and Result in Express Court Findings

The remaining three procedural safeguards — eliciting financial information on ability to pay, providing the noncustodial parent an opportunity to be heard, and requiring express court findings about the noncustodial parent's ability to pay the purge amount — fall within the responsibility of the court in conducting a hearing in a child support civil contempt case. (States with administrative hearings may not have the capability to order incarceration, and do not routinely rely on civil contempt proceedings to enforce child support.) Additional or alternative procedures may be constitutionally required where one side is represented, where the case involves state debt, or where the case is unusually complex in order to ensure a fundamentally fair process.

To expedite these proceedings, it may be useful for the state agency to provide the obligor with a form, or the equivalent, that can be used to elicit relevant financial information. The purpose of this form is to assist the judicial officer in obtaining necessary information to make a determination about the noncustodial parent's actual and present ability to pay a purge amount, or possibly order other measures, such as participation in a work or substance abuse program, to avoid incarceration.

Providing a form is a relatively easy and efficient method of collecting information that can complement automated data available to the child support program. Although *Turner* did not state what might be required in the form, child support agencies are in a unique position to assist the judiciary in identifying the type of information that is most useful, readily obtained and relevant in the child support context. Courts are accustomed to eliciting information on financial status for purposes of determining whether a party is eligible for court fees to be waived or for appointed counsel, but this inquiry may not be as extensive, or appropriately tailored to assist the court in determining whether the obligor willfully failed to pay the underlying support order and the obligor's ability to pay the purge amount. A form may include, for example, questions about the noncustodial parent's expenses, employment information and specific questions about current income and assets. If the IV-D program uses forms in the civil contempt screening process, this information may be admissible at the contempt hearing. The form should be clear and easy for unrepresented obligors to understand and respond to.

In addition, basic due process requires that the alleged contemnor be provided an opportunity at the contempt hearing to respond to statements and questions about his or

her financial status (e.g., those triggered by his/her responses on the form declaring financial assets). Having an opportunity to be heard is a foundation of due process. The civil contempt hearing should present an opportunity to fully develop a record. Research finds that noncustodial parents are more likely to comply with child support obligations when they perceive that the proceedings have been fair, they have been able to explain their circumstances and to be heard, and they have been treated respectfully.[13] In light of *Turner*, at the conclusion of the hearing, the court should make an express finding that the noncustodial parent has the ability to pay the purge amount ordered. To best serve families, courts should consider requiring that this finding be written and tailored to the facts of the individual case before the court. A determination that the noncustodial parent has the actual and present ability to pay or otherwise comply with the purge order should be based upon the individual circumstances of the obligor. Thus, in calculating a purge amount, states are discouraged from setting standardized purge amounts — such as a fixed dollar amount, a fixed percentage of arrears, or a fixed number of monthly payments — unrelated to actual, individual ability to pay. A purge amount that the noncustodial parent is ordered to pay in order to avoid incarceration should take into consideration the actual earnings and income as well as the subsistence needs of the noncustodial parent. In addition, purge amounts should be based upon a written evidentiary finding that the noncustodial parent has the actual means to pay the amount from his or her current income or assets.

In some cases, the result of the contempt review may be a determination by the IV-D agency that the underlying order was inappropriately established or is no longer justifiable. If the noncustodial parent fails to respond to a support petition, some states have a practice of imputing income, which may not result in a support order based upon ability to pay and, ultimately, may not be effective in collecting child support. Research shows that support orders based on imputed income often go unpaid because they are set beyond the ability of parents to pay them. For example, research consistently shows that orders set above 15 to 20 percent of a noncustodial parent's income results in lower compliance than more accurate orders that are based upon actual ability to pay.[14] There also is evidence that when orders are set too high, even partial compliance drops off.[15] The result is high uncollectible arrears balances that can provide a disincentive for obligors to maintain employment in the regular economy. Inaccurate support orders also can help fuel resentment toward the child support system and a sense of injustice that can decrease willingness to comply with the law.[16] The research supports the conclusion that accurate support orders that reflect a noncustodial parent's actual income are more likely to result in compliance with the order, make child support a more reliable source of income for children, and reduce uncollectible child support arrearages.[17]

V. Using Civil Contempt in Child Support Cases in Which Ability to Comply is at Issue

Some states or localities use the threat of contempt sanctions to direct noncustodial parents to participate in programs or activities that will improve their ability to reliably support their children, such as requiring participation in workforce programs, fatherhood programs, or substance abuse treatment programs. Research indicates that these kinds of

programs and services can be successful in increasing child support payment and sustaining those increases for years.[18] In this context, the use of contempt proceedings may be a procedural mechanism to order a noncustodial parent to participate in programs or take advantage of other services as an alternative to incarceration.

These are also considered to be civil contempt actions because the obligor has the ability to comply with the contempt order (e.g. the ability to participate in a "jobs not jail" program or services offered by a problem-solving court), and thus "holds the key to the jailhouse door." In this context, ability to comply with the order may depend upon access to services (e.g. transportation, scheduling) or screening for any relevant disabilities.

More information on programs and services as an alternative to incarceration in civil contempt proceedings is provided in separate policy guidance.[19] These practices also include setting accurate orders based upon the noncustodial parent's actual ability to pay support, improving review and adjustment processes, developing debt management programs, and encouraging mediation and case conferencing to resolve child support issues. For example, establishing child support orders based on parents' ability to comply results in higher compliance and increased parental contact and communication with the child support agency. When parents are involved in setting orders and those orders are based on accurate information, they are more likely to avoid default orders and arrears, and thus less likely to be involved in civil contempt cases. Effective review and adjustment or modification of orders is also an important step in ensuring that noncustodial parents continue to comply with accurate orders based on actual ability to pay them.[20] Alternative dispute resolution, debt management, employment programs, and self-help resources[21] may also avoid the unnecessary build up of arrears and civil contempt actions.

Civil contempt that leads to incarceration is not, nor should it be, standard or routine child support practice. By implementing procedures to individually screen cases prior to initiating a civil contempt case and providing appropriate notice to alleged contemnors concerning the nature and purpose of the proceeding, child support programs will help ensure that inappropriate civil contempt cases will not be brought. By using *Turner* as a guidepost and urging the adoption of, at least, minimum safeguards in all such proceedings, this AT builds upon the innovations already incorporated into many child support programs over the past decade to limit the need for and use of civil contempt.

EFFECTIVE DATE: This action transmittal is effective immediately.

INQUIRIES: Please contact your ACF/OCSE Regional Program Manager if you have any questions.

Sincerely,

Vicki Turetsky
Commissioner
Office of Child Support Enforcement

Endnotes

[1] *Turner v. Rogers*, 564 U.S. ___, 131 S. Ct. 2507 (2011).

[2] Due process refers to the conduct of legal proceedings and the rules established to protect the rights of individuals, including notice and the right to a fair hearing.

[3] *Turner*, 131 S. Ct. at 2512.

[4] *Turner*, 131 S. Ct. at 2512. See S.C. Rule Family Ct. 24 (2011). This method of automatic judicial procedure appears to be unique among states.

[5] See 42 USC 466(a)(a)A) – state tax refund; 42 USC 466(a)(6) – requirement for noncustodial parent to post bond/security for payment; 42 USC 466(a)(7) – credit bureau reporting; 42 USC 466(a)(8)(B)(iv) – IWO; 42 USC 466(a)(14)(A)(ii)(II)(bb) – AEI; 42 USC 466(c) – Expedited Procedures; 45 CFR 303.5(g)(2)(iii) – Paternity establishment; 45 CFR 303.100(a)(6) – IWO; 45 CFR 303.101(c)(2) – Expedited Processes under 466(a)(2) and (c); 45 CFR 303.104(b) –Procedures for noncustodial parent posting bond/security.

[6] Karen Gardiner, *Administrative and Judicial Processes for Establishing Child Support Orders*, Lewin Group, 2002.

[7] See "Establishing Realistic Child Support Orders: Engaging Noncustodial Parents" OCSE fact sheet.

[8] *Turner*, 131 S. Ct. at 2516 (citing Gompers v. Bucks Stove and Range Co., 221 US 418, 442 (1911)).

[9] *Turner*, 131 S. Ct. at 2516 (quoting Hicks v. Feiock, 485 U. S. 624, 638, n. 9)

[10] *Turner*, 131 S. Ct. at 2516 (quoting Hicks v. Feiock, 485 U. S. 624 at 633).

[11] *Turner*, 131 S. Ct. at 2518, (quoting Hicks v. Feoick, 485 US 624, 635, n.7 (1988)).

[12] See https://www.americanbar.org/groups/legal_aid_indigent_defendants/reso...visit disclaimer page.

[13] Maureen Waller and Robert Plotnick, *Effective Child Support Policy for Low-Income Families: Evidence from Street Level Research Journal of Policy Analysis and Management*, Vol. 20, No. 1, Winter, 2001; I-Fen Lin, *Perceived Fairness and Compliance with Child Support Obligations*, Institute for Research on Poverty, Discussion Paper no. 1150-97, 1997 (based on a sample of divorced parents in 1986 and 1988).

[14] Carl Formoso, *Determining the Composition and Collectability of Child Support Arrearages*. WA: Washington Department of Social and Health Services, Division of Child Support (2003); Mark Takayesu, *How Do Child Support Order Amounts Affect Payments and Compliance?* CA, Orange County Child Support Services (2011); U.S. Department of Health and Human Services. Office of Inspector General. *The Establishment of Child Support Orders for Low Income Non-custodial Parents*, Washington, D.C.: U.S. Department of Health and Human Services. OEI-05-99-00390 (2000).

[15] Mark Takayesu, *How Do Child Support Order Amounts Affect Payments and Compliance?* CA, Orange County Child Support Services (2011).

[16] Christy Visher and Shannon Courtney, *Cleveland Prisoners' Experience Returning Home*, Urban Institute, 2006, available at https://www.urban.org/sites/default/files/publication/42966/311359-Cl...visit disclaimer page .; Maureen Waller and Robert Plotnick, Effective Child Support Policy for Low-Income Families: Evidence from Street Level Research Journal of Policy Analysis and Management, Vol. 20, No. 1, Winter, 2001.

[17] For further information, see the report, *The Story Behind the Numbers: Understanding and Managing Child Support Debt*, OCSE Study (2008).

[18] See, for example, Irma Perez-Johnson, Jacqueline Kauff, and Alan Hershey. 2003. *Giving Noncustodial Parents Options: Employment and Child Support Outcomes of the SHARE program*. NJ: Mathematica Policy Research (October). Irene Luckey and Lisa Potts. "Alternative to Incarceration for Low-Income Non-custodial Parents." *Child and Family Social Work*. (March) 2010: 1-11. Susan Gunsch. *PRIDE: Parental Responsibility Initiative for the Development of Employment.* Presented at Client Success Through Partnership: 2010 State TANF and Workforce Meeting. Dallas, Texas. July 2010. Pearson, Jessica, Lanae Davis, and Jane Venohr. 2011. *Parents to Work!* CO: Center for Policy Research (February). Daniel Richard and John Clark. "NEON program marks $10 million Milestone." *Child Support Report* 33:5 (May) 2011.

[19] These innovations are discussed further in Information Memorandum *IM-12-01, Alternatives to Incarceration*.

[20] See "Providing Expedited Review and Modification Assistance" OCSE fact sheet.

[21] See "Access to Justice Innovations" OCSE fact sheet.