

Child Welfare Agency (IV-E) to Child Support Agency (IV-D) Case Referral IEPD

Business Requirements

The Children's Bureau/Office of Child Support Enforcement Joint Workgroup

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EXECUTIVE SUMMARY

The Department of Health and Human Services (HHS) has identified challenges faced by state and local child welfare and child support agencies in sharing data. These agencies must resolve the questions in identifying data that can provide accurate, timely and measurable information for business use, identify the necessary data elements that can be shared and then, identify the path to share it. Exchanging information over disparate system platforms and data-naming conventions can be problematic.

HHS, in an effort to identify potential solutions for this challenge, turned to the National Information Exchange Model (NIEM). NIEM provides a standard language for exchanging data using an Extensible Markup Language (XML) information exchange format. The basic element for storing and exchanging information in NIEM is an Information Exchange Package Document (IEPD).

The goal of this document is to make available to state, tribal, and local child welfare and child support agencies a NIEM IEPD for an automated child welfare agency referral for child support services.

Included in this document are business process improvement justifications with regulatory and policy citations supporting an automated child welfare referral for child support services. Currently, several states conduct electronic referrals between state child welfare and child support the two agencies. For example, state child support and child welfare agencies may share information when a child welfare agency makes a referral for child support services.

INTRODUCTION

HHS administers the title IV of the Social Security Act. The Office of Child Support Enforcement (OCSE) administers the child support program under Title IV, Part D, while the Children's Bureau (CB) administers child welfare services under Title IV, Parts B and E.

Due to the complexity of data sharing, HHS has identified challenges faced by state and local child welfare and child support agencies in sharing data. These agencies have to resolve what data can be shared and how to share it and exchanging information over disparate system platforms and data-naming conventions can be problematic.

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Several components of the U.S. Government use NIEM, including the Department of Homeland Security (DHS), the Department of Justice, and HHS. The proposed information exchange described in this IEPD will facilitate information sharing between state child support and welfare agencies in order to better serve and protect our Nation's children.

The Children's Bureau/Office of Child Support Enforcement Joint Workgroup was formed in 2011 to promote collaboration between the child welfare (titles IV-B and IV-E) and child support (title IV-D) programs. Some of the accomplishments of this group include issuing joint guidance on information sharing (ACYF-CB-IM-12-06; OCSE-IM-12-02), presenting on data sharing, participating in the Federal Parent Locator Service (FPLS) State Services Portal (SSP) Pilot Project, and issuing the FPLS SSP FAQs and updated User Manual.

In 2015, the team, which consists of representatives from CB, OCSE, state child welfare agencies, and state child support agencies convened to develop a NIEM-compliant IEPD for the exchange of data between child welfare and child support agencies. These data exchanges facilitate an efficient process for state child welfare agencies and state child support agencies to exchange data electronically.

MISSION STATEMENT

To promote data exchanges to support child welfare/child support collaboration leading to improved outcomes for children and families. The improved outcomes include:

- Safety—Preventing and responding to maltreatment of children

- Permanency—Stabilizing children’s living situations and preserving family relationships and connections; and
- Well-Being—Enhancing families’ capacity to meet their children’s financial, physical, mental health, and educational needs.

STAKEHOLDERS

- State and local child welfare agencies and information systems
- State and local child support agencies and information systems
- ACF Office of Child Support Enforcement
- ACF Children’s Bureau

GOAL

To make available to state and local child welfare and child support agencies a NIEM compliant IEPD for an automated child welfare agency referral for child support services.

OBJECTIVES

To provide or to create the exchange of necessary data from the child welfare information system to the child support information system in order to:

- support the efficient automated referral from the child welfare information system to the child support information system, providing timely and accurate information to allow for the establishment, enforcement and servicing of a child support case;
- provide current foster care maintenance payment amount;
- assist with identifying potential child support resources for the child or youth; and
- provide the child’s title IV-E eligibility status.

ASSUMPTIONS AND CONSTRAINTS

Assumptions

To identify factors that affect the IEPD’s viability:

- Participants identified in this exchange are the child and child’s parents for whom the referral is being made,
- This exchange includes an indicator to identify the referral as new or as an update to a previous referral; therefore, all IV-E/IV-D agencies exchanging data will develop and agree to transmission protocols and policies for the indicator,
- This data exchange may be modified to meet requirements of specific agencies for establishing a child support case, e.g., tribal, title IV-A and Medicaid,
- This data exchange may be used for the benefit of non-title IV-E eligible children provided the title IV-E agency submits to IV-D an application and the applicable fee on behalf of the family, and

- This IEPD can be extended to include additional data objects and attributes to satisfy specific needs of state systems.

Constraints

To identify factors that affect the IV-E referral:

- This is a one-way data exchange from the child welfare information system to the child support information system, i.e., IV-E to IV-D.
- This data exchange is intrastate exchange only.
- This data exchange will only support the transmission of information for one child in a IV-E Referral Case (not for the use of multiple children, e.g., a sibling group can be submitted one child at a time, not in a group).

BUSINESS CASE

BUSINESS PROCESS IMPROVEMENT

By creating the data exchange referral process, it:

- supports efficient, economical, and effective coordination between the child welfare and child support programs;
- creates more timely and accurate data;
- eliminates or reduces paperwork;
- prevents duplicate data entry; and
- supports improved outcomes for children and families through both programs.

REGULATORY AND POLICY

The following supports the data exchange referral process:

- [45 CFR 1355.52 \(e\)\(2\)\(iv\)](#). This regulation requires a bi-directional data exchange between a title IV-E agency's Comprehensive Child Welfare Information System (CCWIS) and systems operated under title IV-D of the Act to exchange relevant data, including data that may benefit both data exchange partners in serving clients and improving outcomes.
- [ACYF-CB-IM-12-06](#) and [OCSE-IM-12-02](#) issued jointly by CB and the OCSE. This Information Memorandum discusses requests for locate services, referrals, and electronic interfaces between child welfare and child support systems.
- [Automated Systems for Child Support Enforcement: A Guide for States updated in 2009](#), Section A-3. ACF developed this Child Support Enforcement Systems Requirement Guide to support States in the development of comprehensive, statewide automated Child Support Enforcement systems.
- [Automated Systems for Child Support Enforcement: A Guide for States updated in 2009](#), Section A-5. ACF developed this Child Support Enforcement Systems Requirement Guide to support States in the development of comprehensive, statewide automated Child Support Enforcement systems. This section outlines

the use of unique case identifier(s) assigned to identify and track each case in the state, tribe, territory, or foreign country.

- [Automated Systems for Child Support Enforcement: A Guide for States updated in 2009](#), Section D-2. ACF developed this Child Support Enforcement Systems Requirement Guide to support States in the development of comprehensive, statewide automated Child Support Enforcement systems. The system must automatically accept and process case updates and provide information to other programs on a timely basis.
- The Adoption and Foster Case Analysis and Reporting System (AFCARS) – This collects case-level information from state and tribal title IV-E agencies on all children in foster care and those who have been adopted with title IV-E agency involvement. Title IV-E agencies are required to submit AFCARS data twice a year.

CURRENT EXAMPLES OF AUTOMATED EXCHANGES

Several states participating in the NIEM workgroup currently use data exchanges:

- As part of an OCSE 1115 grant, North Dakota initiated a project to improve case coordination between child welfare and child support agencies through the use of automation. One of the main objectives of the project was to create a referral of foster care cases to the child support agency to establish a child support case and access child support services.
- Currently, the Georgia child support services referral process initiates within five days of the court hearing when Georgia's Revenue Maximization unit (RevMax) electronically sends the child and parents' demographic information to the child support agency. Subsequent updates from child welfare to child support include person ID information and the placement address of child. Placement specific information is not included in the update, but the update includes the per diem.
- Ten to fourteen days after the removal of a child from the parents, Oklahoma sends an electronic referral for child support services using a bidirectional interface between the SACWIS and the child support agency. Custody specialists are then able to access child support information in reference to an order for a Non-Custodial parent.

BUSINESS REQUIREMENTS

The IV-E/IV-D Case Referral IEPD will not define any business rules such as, "Validate that birth dates are no more than nine months in the future." Business rules may change and by not embedding business rules in the IEPD reduces the need to change the IEPD when business rules change or are added.

These following requirements are recommended solely as best practices:

- Define mandatory fields for initial and update types of transmissions.
- In an update, only the fields that have changed information should be transmitted along with mandatory fields.
- The IV-D agency should acknowledge receipt of an initial or update referral.
- All roles in a referral are based on the relationship to the child, e.g., parent to child, absent parent to child, grandparent to child.
- Other participants associated with the child, e.g. care-giver, siblings, etc., are not required for this referral.
- A “participant” can be associated with multiple employers.
- A “payroll processor” is associated with an employer.
- The frequency of provider payments may be weekly, bi-weekly, monthly, bi-monthly, and semi-monthly.
- A “provider” can be the placement provider and/or a service-related provider.
- A single referral and update for a child may include many court documentation identification numbers.
- Single court documents may have multiple decisions.
- If the child support order number is unknown, the field should be blank.
- Foster Care Permanency Goal updates, established by title IV-E agencies, contain only one primary goal, but may have multiple concurrent goals.
- The Head of Household is an optional field indicator of the specified parent who is considered the head-of-household for IV-E eligibility purposes.
- Non-enforcement of an order with a later, subsequent update seeking enforcement of an existing child support order may accommodate agency business practice. Examples might include:
 - when the parent is cooperating with reunification efforts and the establishment or enforcement of a child support order would be deemed a barrier in achieving that goal,
 - when a special needs child is adopted, then later re-enters foster care, or
 - when the parent is the victim of the child’s criminal conduct.
- An update transmission from the IV-E agency to suspend further IV-D agency activity may be necessary to accommodate agency business practice.
- Only one principal may be identified in a case and it excludes the child in the data exchange.

IEPD DESIGN CONSIDERATIONS

MESSAGE TRANSMISSION POLICIES

The IV-E/IV-D Case Referral IEPD will include data elements to ensure the integrity of transmission of the data such as message receipt acknowledgement.

DATA QUALITY REQUIREMENTS

The IV-E/IV-D referral recommends a data quality approach that sustains: completeness of fields in the referral, valid names and dates that are accurate from the IV-E case. The IV-E referring office should be timely in submissions based on state or tribal regulations and policies.

A timely, complete and accurate response from IV-D is to be expected. The transmission of IV-D information through NIEM is to be determined.

PRIVACY REQUIREMENTS

- Referral information be exchanged and maintained in accordance with confidentiality requirements in section 471(a)(8) of the Social Security Act, and 45 CFR 205.50 (cross referenced in 45 CFR 1355.30(p)(3)), and 42 U.S.C. 5106a(b)(2)(B)(viii)-(x) of the Child Abuse Prevention and Treatment Act.
- Referral information must be exchanged and maintained in accordance with the confidentiality requirements of applicable state or tribal laws.

REFERENCE MATERIALS

For further information:

- Administration for Children and Families, <https://www.acf.hhs.gov/>
- Children's Bureau, <https://www.acf.hhs.gov/cb>
- Division of State Systems, <https://www.acf.hhs.gov/cb/research-data-technology/state-tribal-info-systems>
- Child Welfare Policy Manual, https://www.acf.hhs.gov/cwpm/programs/cb/laws_policies/laws/cwpm
- U.S. Government Publishing Office, Electronic Code of Federal Regulations (eCFR), <https://www.ecfr.gov/cgi-bin/ECFR?page=browse>
- Children's Bureau Technical Bulletins, <https://www.acf.hhs.gov/cb/laws-policies/technical-bulletins>
- Comprehensive Child Welfare Information System, 45 CFR §95.1355
- Social Security Act (The Act) https://www.ssa.gov/OP_Home/ssact/title04/0471.htm