

**Policy 7.01 Implementation Plan and Progress Report DRAFT**

Timeframe: July 1, 2019 through June 30, 2020

Updated 03/27/2019

**Division: Child Support**

**Region/Office: Tacoma Field Office**

**Tribe(s): Port Gamble S’Klallam**

Plan and Progress Report Due Dates: April 2 (Regional Plan submitted to Assistant Secretary) and April 30 (Assistant Secretary Plan submitted to OIP) of each year.

<b>Implementation Plan-Director Level</b>				<b>Progress Report</b>
<p>1. Policy Identification: Provide Tribes with meaningful opportunities for involvement and consultation in the development of state child support related legislation, departmental plans, budgets, policies, program services, contracted services including services provided under contract with ESA/DCS, operational procedures, federal waivers or exemptions to state plans that affect American Indian people.</p>				<p>This is a proposed addition to the 7.01 Plan that is still being evaluated.</p>
<b>1 A. Coding Tribal Cases Correctly</b>				<b>Progress Report</b>
<b>Goals/Objectives</b>	<b>Activities</b>	<b>Expected Outcomes</b>	<b>Lead Staff and Target Date</b>	<b>Status</b>
<p>To properly code new cases that are open in SEMS with Tribal coding.</p> <p>PGST* requested DCS collect data to determine if there is a pattern for why all tribal cases are not coded with tribal information. Cases that are not coded with Tribal information could create major problems.</p>	<p>Tacoma Field Office and PGST will work to correctly identify PGST tribal members and make sure coding on the case is correct.</p> <p>Since PGST caseload is relatively small, DCS will work with TRT to review all cases that are not coded correctly to see if there is a pattern.</p>	<p>To reduce or eliminate the miscoding of Tribal members.</p> <p>Determine if there is a pattern as to why cases are coded incorrectly and to fix the problem.</p>	<p>State: TRT, Steve McDannel, Mary Groom</p> <p>Tribe: Maria Huynh</p> <p>Target Date: Review annually.</p>	<p>DCS developed a tracking spreadsheet. PGST will continue to bring to DCS attention any cases that have fallen through the cracks. All cases will be added to the spreadsheet.</p> <p>Last year, none were identified.</p>

<b>1 B. Inappropriate Letters sent to PGST Clients</b>				
<p>DCS is federally mandated to send letters regarding rights to modify orders to incarcerated NCP's expected to be in for more than 6 months. (45 CFR 303.8 (b) (7) ii). These letters can cause confusion on Tribal cases. DCS will work with PGST on this issue.</p>	<p>DCS is working with its Policy Unit to try to find a resolution.</p>	<p>Stop sending automatic letters on these cases whenever possible and/or create a cover letter to explain the tribal connection and how this affects any given case.</p>	<p>State: Kimberly Curtis (Policy), Steve McDannel, Mary Groom</p> <p>Tribes: Maria Huynh</p> <p>Target Date: 9/1/19</p>	<p>DCS is working on a process to exempt tribal members from getting an automatic letter.</p> <p>TRT and PGST will work together regarding SEMS sending these letters out automatically and seek solutions to prevent them going out manually without first notifying PGST.</p>
<b>1 C. Credit Bureau Reporting</b>				
<p>DCS is federally mandated to report cases to the Credit Bureau Reporting (42 USC 666(a)(7), 45 CFR 302.70(a)(7), 45 CFR 303.7(d)(6)(iii), WAC 388-14A-2160) on responding cases. For Tribal Cases DCS has been reporting to the Credit Bureau for responding and initiating cases.</p> <p>PGST does not want Credit Bureau Reporting on any of their cases.</p>	<p>DCS will work on developing a pilot with data tracking and if/when that is completed, then if appropriate, will fix cases in SEMS to stop the Automatic reporting to the Credit Bureau on a case by case basis.</p>	<p>To eliminate unwanted enforcement actions taken on Tribal Cases.</p>	<p>State: TRT, Kimberly Curtis, Kimberly Curtis (Policy), Steve McDannel, Mary Groom</p> <p>Tribes: Maria Huynh</p> <p>Target Date: 9/1/19</p>	<p>If/when policy is changed, PGST may request, on a case by case basis, to prevent credit bureau reporting if not already reported.</p> <p>For cases reported inappropriately due to incomplete payment info that DCS has, DCS will correct the reports when these cases are identified.</p> <p>For DCS initiated cases, DCS will send PGST a list of cases that currently have Credit Bureau Reporting being done.</p> <p>For automatic case reporting, TRT and DCS Policy will have discussion with DCS Director</p>

				Sharon Redmond and the Tribe regarding whether it can be discontinued.
<b>1 D. Communication and Problem Solving</b>				<b>Progress Report</b>
A. Shorten DCS response time to Tribal policy requests (state-wide).	Bi-annual meetings occur between the DCS Director and Tribal Child Support Directors for this purpose. -For the other two quarters, updates on progress should be reported from DCS by phone conference calls.	Issues will be resolved in a timelier manner with status updates provided at least quarterly.	State: Sharon Redmond, TRT  Tribes: Tribal Child Support Directors  Target Date: Bi-annually	The directors meet bi-annually and TRT will arrange quarterly conference calls with the Tribal Directors for the other quarters regarding Policy issues addressed at the Bi-Annual Meetings. TRT will send Tribal Directors draft canary notices changes.
B. Reducing the risk of child support distributing incorrectly on Tribal cases.	DCS to promulgate a distribution regulation for Tribal Distribution payments on tribal cases. The tribe will notify DCS when to set Special Instructions on cases to minimize distribution errors.	Regulation finalized.	DCS Policy staff/Sharon Redmond. Tribal Child Support Directors Target date: Review annually.	WA Policy was modified to allow distribution of payments that do not follow the algorithm when PGST requests for business purposes and/or to match their laws and policies. WAC 388-14A-5007 to allow this was amended and became effective 7/1/18.
<b>Implementation Plan</b> <b>2. Policy Identification: Case Referrals</b>				<b>Progress Report</b>

<p style="text-align: center;"><b>Goals/Objectives</b></p> <p>A. Continuation of Services: when a party terminates State TANF, determine who should continue services (DCS or PGST).</p> <p>When State TANF ends, PGST would like Non-assistance services to revert to them on a case by case basis.</p>			<p style="text-align: center;"><b>Activities</b></p> <p>DCS and PGST will review cases on a case by case basis to determine for which time periods each should charge.</p> <p>Investigate whether it is sufficient for DCS closure guidelines to allow PGST to take a verbal request for closure from a Custodial Parent for a DCS case and then provide their own written affidavit of this request to DCS.</p>	
<p>B. Handling cases for Continuation of Services when foster care (FC) ends.</p>	<p>When State foster care ends, PGST would like Non-assistance services to revert to them on a case by case basis.</p>	<p style="text-align: center;"><b>Expected Outcome</b></p> <p>Clear understanding by both DCS and PGST of which time periods each jurisdiction is charging; who is providing services; and who should enforce.</p> <p>When a Custodial Parent stops State TANF, Mary or Steve will contact PGST.</p> <p>Both agencies will work together to get services reverted to PGST within DCS policy guidelines.</p>	<p style="text-align: center;"><b>Lead Staff and Target Date</b></p> <p>State: Mary Groom, Steve McDannel, TRT</p> <p>Tribe: Maria Huynh</p> <p>Target date: Review Annually.</p>	<p style="text-align: center;"><b>Status</b></p> <p>At the beginning of each month, DCS will continue to pull a list of cases for which TANF has ended and provide it to PGST. PGST will then notify DCS if they have any info that the child is no longer in the household. On average this there is less than one case per month that meets this criterion.</p> <p>When appropriate, DCS will work with the tribe to try to close DCS cases so enforcement can revert to PGST.</p>
<p><b>3. Policy Identification: Technology and</b></p>	<p><b>Progress Report</b></p>	<p>To identify cases that should revert to PGST for enforcement when foster</p>	<p>State: Mary Groom, Steve McDannel, TRT</p>	<p>The DCS Policy Unit has developed policy regarding termination of FC that allows</p>

<b>SEMS Information and Access</b>		care ends and allow PGST to resume enforcement.	Tribe: Maria Huynh  Target date: Review Annually	PGST to resume services when FC ends. DCS will pull a list each month to provide to PGST.
<b>Goals/Objectives</b>  A. To locate parties of Tribal Child Support cases in the most expedient manner possible in circumstances when PGST and DCS do not have a shared case.			<b>Activities</b>  PGST will send a Transmittal #3 to DCS HQ when they need these services.	
B. PGST is requesting that DCS provide employer information unavailable through SEMS Web. e.g. the Employer Inquiry screen.	DCS will provide additional information as available	<b>Expected Outcome</b>  Enhanced locate services	<b>Lead Staff and Target Date</b>  State: Mary Groom (with assistance from DCS HQ)  Tribe: Maria Huynh  Target Date: Review annually	<b>Status</b>  DCS continues to provide locate services as resources allow. PGST can send a Locate Only Transmittal (#3) to DCS. DCS H.Q. can only check State databases for Locate Only cases. To get federal information an IG referral is needed and a case must be opened.
<b>4. Policy Identification: Treasury Offset Certification</b>	<b>Progress Report</b>	Allow the tribe ability to send the garnishment to the correct corporate headquarters.	State: Steve McDannel, Mary Groom  Tribe: Maria Huynh  Target date: Review annually	PGST may call DCS "Tribal Liaison" or any TL when they need the best address for an employer.
<b>Goals/Objectives</b>  Certify appropriate cases for Treasury Offset.			<b>Activities</b>  PGST requests DCS certify child support debt for Treasury	

				Offset.
<b>5. Policy Identification: Training Opportunities</b>	<b>Progress Report</b>	<b>Expected Outcome</b>  PGST cases referred by the tribe will be certified for Treasury Offset.	<b>Lead Staff and Target Date</b>  State: Steve McDannel, Mary Groom  Tribe: Maria Huynh  Target Date: review annually.	<b>Status</b>  Progress continues. There are no changes to our process.
<b>Goals/Objectives</b>  Share training opportunities. It is difficult for tribal case managers to come to Tacoma for a one hour or two hour class. As needed, PGST may request DCS to develop training and present it to their staff. Other tribe's staff could also attend these classes.				<b>Activities</b>  DCS and PGST will advise each other of ongoing training events.
<b>6. Policy Identification: Communication and Problem Solving</b>	<b>Progress Report</b>	<b>Expected Outcome</b>  Share training resources and opportunities from DCS to Tribal staff upon request.  DCS to provide refresher training on Conference Boards upon request.	<b>Lead Staff and Target Date</b>  State: TRT, Steve McDannel, Mary Groom  Tribe: Maria Huynh  Target Date: review annually.	<b>Status</b>  TL will develop the training and provide to PGST upon request and invite other tribes as appropriate.  DCS will provide refresher training on SEMS and ACES upon request.
<b>Goals/Objectives</b>  A. Provide avenues to discuss problems and solutions				<b>Activities</b>  All Division of Child Support staff commits to be accessible and approachable.

				Tribal staff is encouraged to call the SEO 4 Tribal Liaison, the District Manager, or TRT should front-line efforts at DCS not meet expectations or there are suggestions for improvement.
<p>B. Effectively working hard-to-collect cases involving PGST tribal members where collection remedies have been exhausted by the Tribe.</p> <p>C. DCS is federally mandated to send letters to incarcerated NCP's expected to be in for more than 6 months. These letters can cause confusion on Tribal cases. DCS will work with PGST on this issue.</p>	<p>Line staff from both offices will discuss individual cases and their circumstances to best identify the most effective way to work the case.</p> <p>DCS is working with its Policy Unit to try to find a resolution.</p>	<p><b>Expected Outcome</b> Problems will be corrected quickly and effectively.</p>	<p><b>Lead Staff and Target Date</b> State: Steve McDannel, Heidi Montgomery, or TRT  Tribe: Maria Huynh  Target Date: review annually.</p>	<p><b>Status</b>  Process continues. PGST will bring issues to the SEO4 tribal liaison, DM or TRT.</p>
<p>D. Promote regular meetings between Tribal and DCS Staff. PGST can request additional meetings as needed.</p>	<p>DCS and Tribal staff will meet separately from the regular 7.01 meetings to discuss issues of unique concern or process to this program and relationship. The District Manager Heidi Montgomery and the Tribal Unit staff will meet with all Tribal Representatives on a quarterly basis at our "7.01 Meetings."</p>	<p>Cases will continue to be worked utilizing the resources available to both DCS and the Tribe in a way that preserves the Tribe's jurisdiction and maximizes available collection remedies.</p> <p>Stop sending letters on</p>	<p>State: Steve McDannel, Mary Groom  Tribe: Maria Huynh  Target Date: as requested  State: Kimberly</p>	<p>It is very beneficial for DCS staff to meet face to face to go over more difficult cases.. DCS will periodically meet with PGST to review cases and DCS will come to PGST whenever requested. DCS will continue to work with Policy on this issue to try to resolve.</p>

		these cases whenever possible and/or create a cover letter to explain the tribal connection and how this affects any given case.	Curtis (Policy), Steve McDannel, Mary Groom  Tribe: Maria Huynh  Target Date: 9/1/19	
E. Effectively communicate circumstances where DCS receives an overpayment on a case and the payment has come from PGST.	DCS and PGST to consult with each other before refunding overpayments to clients.	Enhanced communication; understanding and respect; cross program discussions; problem solving; issue identification; mutual support.	State: Heidi Montgomery, Steve McDannel, Mary Groom  Tribe: Maria Huynh  Office of Indian Policy: Brenda Francis-Thomas Target Date: Quarterly	Quarterly 7.01 meetings work very well. DCS will organize and facilitate the meetings. These meetings have occurred regularly (quarterly) for many years.
		Prevent financial errors in applying and refunding money inappropriately.	State: Mary Groom, Steve McDannel  Tribe: Maria Huynh  Target Date: review annually.	Progress continues. DCS/PGST communicates as to where the refund should go if there is an overpayment and whether payment should be refunded or held for rollover.  Also, DCS will contact PGST regarding any payments being held for rollover.
<b>7. Policy Identification: Hiring</b>	<b>Progress Report</b>			

<b>Goals/Objectives</b>				<b>Activities</b>
Inclusion of Tribal Staff in major DCS hiring decisions				DCS will invite Tribal Staff to participate in interview panels and/or consult on major hiring decisions in this office, particularly any that have direct impact on Tribal Team workload, including District Manager, Child Support Program Manager, Supervisor and Tribal Liaisons.
<b>8. Policy Identification: Teambuilding</b>	<b>Progress Report</b>	<b>Expected Outcome</b>	<b>Lead Staff and Target Date</b>	<b>Status</b>
		Increased relationship building through participation in key hiring decisions.	State: Heidi Montgomery, Steve McDannel  Tribe: Maria Huynh  Target Date: review annually.	PGST will be asked to participate in interview panels and provide tribal aspect in hiring decisions that have a direct impact on the tribal team
<b>Goals/Objectives</b>				<b>Activities</b>
Build a stronger sense of teamwork between the DCS Tribal SEOs and Tribal Program Staff.				DCS staff and PGST will advise each other of relevant office or cultural events.

9. Policy Identification: Institutional Memory	Progress Report	Expected Outcomes	Lead Staff and Target Date	Status
		DCS and PGST will participate in gatherings as opportunities arise.	State: Heidi Montgomery, Steve McDannel  Tribe: Maria Huynh  Target Date: annual	DCS / PGST participate in relevant office and cultural events.
<b>Goals/Objectives</b>				
To memorialize decisions and agreements between PGST and DCS for future reference				

### Completed or Tabled Items

**\*List of Acronyms**

- ACES – Automated Client Eligibility System (IV-A database)
- FC - Foster care
- DCS - Division of Child Support
- DM – District Manager
- FC – Foster Care
- HQ – Headquarters
- OIP – Office of Indian Policy
- PGST- Port Gamble S’Klallam Tribe
- SEMS – Support Enforcement Management System (DCS’s database for cases and case work)
- TANF – Temporary Assistance to Needy Families (Cash benefits)
- TFO – Tacoma DCS Field Office
- TL - Tribal Liaison

TRT- Tribal Relations Team

Goal/Activity/Outcome	Date	Item
MEO cases referred when biological parents in the home	October 2013	Completed
Requested access to more SEMS WEB screens	December 2013	Complete can revisit at a future date if necessary
PGST requested training on SEMS and ACES	February 2013	Training Provided
Request for multiple Tribal Access Code	December 2015	Unable to update SEMS, can revisit at a future date if necessary
PGST requested DCS look at ways to get orders enforced without having to serve notice as there is a delay in enforcement	March 2016	TRT provided language that other Tribal courts used for immediate enforcement. PGST provided that language to their tribal court.
Foster Care Referrals. DCS is working with Children's Administration to ensure foster care cases are coded correctly	March 2016	Complete. DCS discovered why cases are not coded correctly and are working with Children's Administration to resolve this issue.
PGST requested ability to look at case file images to see the order. SEMS WEB only allows them to view DATA only	March 2016	PGST requested this item be moved to completed as they cannot access case file images only Court Order summaries in SEMS WEB.
PGST requested DCS look at easier options for payment to be deposited directly. The online web portal requires a debit which is not an option for the tribe.	March 2017	Unable to resolve at this time, may revisit in the future.
PGST requested DCS provide Conference Board training.	2017	Training provided.
DCS to train their HQ and Field Set-up staff on ways to identify Tribal cases.	2017	Training held at HQ and in Field Office.
PGST requested DCS look into other options for direct payments	2017	Due to limitations on both ends, no resolution was found. This may be revisited in the future.

Goal/Activity/Outcome	Date	Item
Find and close cases that were originally opened for Medical Enforcement only and for which DCS has never received an application for full services.	January 2018	It appears all cases have been identified and closed.
PGST participation on DCS hiring panels.	March 2019	In the past, PGST has been invited to hiring panels in Tacoma DCS for the positions of District Manager, Child Support Program Manager and on the Tribal team. They have participated when they were available to do so. This continues.
DCS to provide a list of common cases for which TANF has terminated so PGST can determine who should continue/resume services.	March 2019	DCS has provided a list each month and has networked with PGST to determine continuation of services for each case. This continues.
When requested, allowing continuation of services to revert to PGST when foster care ends.	December 2017	A change in policy now allows DCS to let PGST provide continuation of services with the new custodial parent when ongoing foster care ends. The policy changed, but the process is ongoing.
Conference Board training was provided.	January 24, 2019	

## Port Gamble S'Klallam Tribe

TLs are directed not to disclose IRS or FTI to Tribal child support programs in any way, verbally or written. Payment amounts may be described as voluntary or involuntary, or administrative/non-administrative.

### Caseload Assignments

The 6624 caseload is Responding to PGST CSP, it is a combination of "IRS Only", Full Enforcement and Associated cases. The 1963 caseload is Initiating to PGST for enforcement.

### Communication methods

PGST CSP prefers to be contacted by email, but if immediate assistance is required please contact the assigned Case Manager via the telephone. Please list NCP's initials in the Subject line.

If DCS is contacted by other states, Maria has given approval to give out her direct contact information.

### Employment and Enrollment Verifications

Send a Secure email to Amber Caldera; provide the parties (*name, social security number and date of birth*) if employment verification also include the tribal employer's name.

### Providing Continuation of Services

If there are any, then the Tribal Liaison will contact PGST CSP to discuss which agency will provide continuation of services to the CP. The CP must send DCS a written request to close the case if PGST CSP will continue enforcement. If the CP doesn't, DCS will send a letter to the CP to ask which agency should continue services. Then if there is still no response, DCS will initiate case closure based on non-cooperation. Meanwhile, DCS will hold current support payments until resolved.

### Referrals for Paternity and Order Establishment

*(Do not delay this process just because we do not have a current address for the NCP. As soon as it is identified that the NCP is a PGST member, start the process. If in doubt, check with PGST).*

1. Send 9-881 to CP (**2 week waiting period**)
2. Transmittal #1 – 18-570 and Acknowledgment - 18-729

3. Confidential Information form – 18-730
4. CBRI or Birth certificate (if available in SEMS or Barcode). If not, send a screen shot of DOH birth record screen.
5. Print out of Dates on/off TANF (*4R Screen*) and Dates on/off Foster Care (use dates in Famlink).
6. Scan referral and send via secure email to Amber Caldera, do not mail originals. Amber will send a response confirming receipt of referral and who has been assigned as Case Manager
7. Add Intergovernmental information to the 'BC' screen
8. Tribal Access Code: 25 and Non US FIPS Code: TR-025.
9. Set RC out for 6 months, to check status. (When possible, please send/email all DCS forms & additional information to PGST together in one combined PDF).

### Referrals for Enforcement

1. Send 9-881 to CP (**2 week waiting period**)
  2. Send Transmittal #1 – 18-570 and Acknowledgment - 18-729
  3. Confidential Information form – 18-730
  4. CBRI or Birth certificate (if available in SEMS or Barcode). If not, send a screen shot of DOH birth record screen.
  5. Print out of Dates on/off TANF (*4R Screen*) and Dates on/off Foster Care.
  6. Copy of Court Order
  7. Split version of Debt Calculation to show buckets (no certification required)
  8. Case Payment History
  9. AH screen if NCP has multiple cases
  10. Scan referral and send via secure email to Amber Caldera; PGST CSP does not require certified copies and do not mail originals. Amber will send a response confirming receipt of referral and who has been assigned as Case Manager.
  11. Add Intergovernmental information to the 'BC' screen
  12. Tribal Access Code: 25 and Non US FIPS Code: TR-025.
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10. Set RC out for 6 months, to check status. (When possible, please send/email all DCS forms & additional information to PGST together in one combined PDF).

### **Referred back to DCS – Paternity and Order Establishment**

PGST CSP will attempt to work a case; if unsuccessful they will refer the case back to DCS in approximately 6 months for enforcement. If DCS has jurisdiction to proceed, the Tribal Liaison will work it like a regular case.

### **Refunds and Rollover Payments**

When a case becomes current and there are additional funds held in suspense by DCS, the Tribal Liaison will contact PGST CSP to confirm if the payment should be refunded, held or applied to the next month's support or sent back to PGST to refund.

### **Special Distribution Cases**

Leeanne will notify Mary to set SI on cases when the tribal payment needs to be disbursed differently than by the algorithm, per PGST CSP request.

### **Treasury Offset Cases**

Our Treasury Offset Agreements with tribes *do not* include passport denial and never have. So if the only case we have is for treasury offset, we will need to manually deselect the passport denial option. Also, the Credit Bureau should be set to "E" = Exempt.

### **Treasury Offset Certifications**

1. PGST CSP may send cases for enforcement even if the debt has not yet met the threshold for certification. This is will be done if no additional payments from the NCP are anticipated.
2. Leeanne will continue to send the Treasury Offset Certification List by the 10<sup>th</sup> of each month.
3. If a case/debt is paid in full by the Treasury Offset payment, the case will remain open.

### **Credit Bureau Reporting**

The Credit Bureau Reporting indicator should be set to E (Exempt) on IRS only cases received for enforcement from the Port Gamble S'Klallam Tribe.

### **Domestic Violence Information**

Domestic Violence information should be listed on page 2 of the Transmittal #1 under Section VI. Other Pertinent Information.

## **Miscellaneous Information**

1. After a new referral has been received and DCS has completed setting up a case, send a “Split Debt Calc” to PGST. This will inform them that the case set-up has been completed and this will also provide PGST with the DCS case D# that has been assigned to the new case.

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