



Oklahoma Department of Human Services, Child Support Services Division

Final Report

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Executive Summary

In 2019, the Office of Child Support Enforcement (OCSE), within the U.S. Department of Health and Human Services' Administration for Children and Families, awarded Intergovernmental Case Processing Innovation Demonstration grants to seven states and two tribal child support agencies. These grants provided funding to test innovations that will increase payments on intergovernmental cases and improve case processing procedures for parents. The Oklahoma Department of Human Services (DHS), Child Support Services Division (CSS), received one of the grants.

CSS proposed a collaborative Information Technology (IT) project with three comprehensive tribal child support (IV-D) programs in Oklahoma: the Cherokee Nation, the Modoc Nation, and the Muscogee (Creek) Nation. The goals of this project were to:

- Improve Temporary Assistance to Needy Families (TANF) and Foster Care (IV-E) recovery collections for Oklahoma from tribal IV-D programs on intergovernmental cases
- Decrease or eradicate duplication of child support cases by tribal child support services and CSS
- Ensure tribal IV-D custodial parents receive proper current support and arrears distributions of collections after termination of their state assistance benefits

The grant project sought to produce several important products and outcomes:

- Electronic file transfer for case information important to both the tribal and state child support programs and their customers
- Modified tribal child support system that will automatically receive and consume data when tribal case participants start or end state benefits (TANF or IV-E) and correctly distribute child support collections
- New tribal caseload database within the state child support system. If approved, the grant will pay 100% of the cost of this project.

On March 11, 2020, the World Health Organization declared COVID-19 a pandemic. All government functions in Oklahoma had to divert primary manpower and Information Technology resources to providing services in a new environment. The state and tribal child support programs converted from an in-office delivery system to a remote workforce. To do that, paper files had to be imaged, staff had to be issued home office IT equipment, and business processes had to be converted to online and remote capability. The changes thrust onto the child support program devoured all available IT resources, significantly affecting this project.

With a one-year no-cost extension of the initial two-year grant period, the state IV-D program has completed all its intended IT infrastructure goals to make this project functional. However, the intended recipients of the grant project were primarily customers of both the state and tribal child support programs. Because the tribal IV-D programs could not complete their IT portions of the grant project, key components of the intended outputs stand incomplete. The state and tribal partners are still working to complete the goals of this project, but many goals and results are incomplete. It is the hope of the state CSS to submit a later final report that better reports on the expected success of this project.

Problem

Oklahoma Child Support Services (CSS) manages over 189,500 active child support cases and serves as an economic advocate for the children of Oklahoma. In Federal Fiscal Year 2018, CSS collected \$357 million dollars in child support. In addition, and importantly for this project, DHS is the state agency that administers the Temporary Assistance to Needy Families (TANF) and Foster Care (IV-E) programs.

CSS proposed a collaborative Information Technology (IT) project with three comprehensive tribal child support (IV-D) programs in Oklahoma. The partners include the Cherokee Nation, the Modoc Nation, and the Muscogee (Creek) Nation. Since tribal children are Oklahoma children, CSS prioritizes strong relationships with tribal partners serving them. CSS sought to improve customer service, streamline intergovernmental processes with tribal IV-D programs, and improve current business practices. The project aimed to pilot and establish a national standard for data transfer between state and tribal partners, better align with National Information Exchange Model (NIEM) data standards, and integrate NIEM into OCSE's Model Tribal System (MTS). The goal was to improve processes to refine practices, increase collections, and improve intergovernmental tribal partnerships.

The transmission of state benefits case data between governmental agencies is often a barrier to processing and distributing child support correctly. With the current practices, it is possible for families in Oklahoma to receive child support payments from tribal IV-D programs and TANF benefits from the state. This results in overpayments. CSS loses assigned TANF and IV-E collection recoveries when tribal IV-D programs are unaware of their customers' receipt of state benefits and their required assignment of child support collections. Erroneous payments to custodial parents that have assigned their child support to the state hinder processes and result in a loss to the state of Oklahoma. Overpayment to the beneficiary requires repayment of potentially already-used funds, resulting in further difficulty to the recipient families and governments involved. Likewise, custodial parents sometimes do not receive the distributions of collections to which they are entitled.

Currently, to have state benefits information, the tribal IV-D programs staff must manually search and view the state computer system for each of their child support case participants to determine if state benefits are being provided. In addition, the tribal IV-D staff must then manually update MTS or another tribal child support case management system with the state benefits information to follow proper distribution requirements. There is no automated searching for state benefits or automated updating to the MTS.

Tribal IV-D programs only learn when one of their child support customers begin receiving state benefits that require a state child support case when the customer notifies the agency, when CSS receives an intergovernmental referral and manually matches to a manually created tribal case list, or when a CSS District Office attempt collecting from a non-custodial parent already paying a tribal Child Support agency. In addition, tribal IV-D programs have no way of knowing when a custodial parent stops receiving state benefits. Under these circumstances, tribal IV-D programs will continue to remit collections to CSS that should have been paid to the custodial parent per Family First distribution requirements. Between the three participating tribes, there are 5,676 total active child support case. Of those cases, 844 custodial parents are known to either currently be receiving state TANF or are former state TANF recipients. Each of these cases should be an "intergovernmental" case between the state CSS and the tribal IV-D program. With such a large pool of recipients, intergovernmental communication of case data between CSS agencies would not only expedite the process but would improve their ability to provide better customer service, recognize and avoid overpayments and

duplications, saving both agencies time and money. This project would also allow the four participating child support programs to identify the unknown state benefit recipients.

Process Changes

The proposed project allows the computer systems to do a large part of the manual work related to tribal intergovernmental case processing when a tribal customer receives state benefits. The project aimed to establish a standard protocol for sharing information electronically between the state and tribal partners. The new process removes the burden of manually matching duplicate cases and reducing the time staff spend on working duplicate cases. Oklahoma CSS will receive an electronic file of open cases from a tribal IV-D program. Information received in the file will be matched to the DHS mainframe to participants who receive state benefit assistance. The file is then returned to the tribal IV-D program with the matches to state benefits.

Interventions

The project sought to produce several important products and outcomes:

- Electronic file transfer for case information important to both the tribal and state child support programs and their customers
- Modified tribal child support system that will automatically receive and consume data when tribal case participants start or end state benefits (TANF or IV-E) and correctly distribute child support collections
- New tribal caseload database within the state child support system

Intervention 1: Electronic File Transfer

The goal of this intervention was to develop a process and electronic information pipeline to securely share data with the Cherokee, Muscogee (Creek), and Modoc Nations.

Development

The state CSS program and the three tribal IV-D programs previously worked together to establish a similar secure file transfer process (SFTP) to offset state and federal tax refunds of tribal case obligors. The child support programs worked together to establish this new SFTP as described in Appendix A.

Description

The state CSS has successfully exchanged electronic test files through the SFTP with all three tribal IV-D programs. However, because IT resources for both the state and tribal programs were diverted to deal with the COVID-19 pandemic, two of the tribal IV-D programs have been unable to complete the establishment of the regular and periodic file transfer of case data.

Intervention 2: Modified Tribal CSS Systems

Oklahoma CSS and the three tribal programs set a goal of modifying each tribal child support case management system to automatically receive and consume data when tribal case participants start or end state benefits (TANF or IV-E) and correctly distribute child support collections.

Development

Efforts to establish a national standard for data transfer between state and tribal partners, better align with National Information Exchange Model (NIEM) data standards, and integrate those standards into the MTS began right after the grant was awarded. CSS and the tribal programs worked with OCSE staff to acquire the expected NEIM standards for data transfer and these standards have guided all programming efforts to design the transfer of data in each case management system. The file layouts for both the file to be sent from a tribal IV-D program to the state and the return file from state to tribal IV-D programs was designed in group meetings and is documented in Appendix B.

Description

Because IT resources for the tribal IV-D programs had to be diverted to pandemic-related projects, the tribal IV-D programs could never make the desired updates to their case management systems. The Cherokee Nation has reported that they are able to take the return file from the state containing their customers' TANF or IV-E participation and create a report for case workers.

Intervention 3: Tribal Caseload Database in State System

CSS sought to build a database of all known and open tribal IV-D cases from the tribal case participant files. The database would be used by the staff of the state CSS Case Initiation Center (CIC) and the CSS case management computer system to identify open tribal IV-D cases/participants for all referrals or applications received by CSS. Mandatory state child support case referrals are received when individuals receive state TANF or are involved in IV-E funded custody cases. Instead of opening new state cases and immediately beginning establishment or enforcement efforts, CSS would know to initiate outgoing intergovernmental referrals to tribal IV-D programs when custodial parents and/or their children are in the database.

Development

A number of technical meetings were held between CSS and the tribal IV-D programs to establish the tribal case load file layout design. This design was then used by the three tribal IV-D programs to at least send through the SFTP a test file of tribal cases.

In addition, IT resources for the state program created a database within the state case management system to receive the tribal case participants files and display all such cases for use by CIC staff. A complete description of this process and database are in Appendix C.

Description

Because the tribal IV-D programs had to devote IT resources to other projects during the pandemic and grant period, only one of the three programs has been able to regularly send a case participants file through the SFTP. A second tribal IV-D program was initially able to send one tribal participants file but was unable to send a similar file on a regular schedule. That second tribal program continues to state they will establish a regular process as soon as their IT resources allow. The third tribal IV-D program, although they have not yet sent a file of case participants, continues to state they will work toward sending a regular file as their IT resources allow. The state is ready to continue work on this effort.

The state has also developed training materials for case initiation staff and will train such staff when the two tribal IV-D programs are able to send regular files.

Accomplishments and Conclusions

- Established an SFTP for exchange of key data necessary to improve customer service for child support between the state and the three tribal IV-D programs. This infrastructure development is a necessary first step in the continued hope for project success.
- Developed a standardized file layout and format using National Information Exchange Model (NIEM) standards for the exchange of data between state and tribal child support case management systems.
- Successfully exchanged test files between the state and each of the participating tribal IV-D programs.
- Successfully completed programming necessary to receive a tribal case participant electronic file, match those tribal cases against all state TANF and IV-E participants, and create a return file of information for tribal case management system consumption and updating.
- One of three tribal IV-D programs developed and implemented a regular transfer of case participants using SFTP.
- One of three tribal IV-D programs developed a report and manual process to deal with their customers going onto or off state TANF and IV-E benefits.
- Successfully completed all programming necessary to receive tribal case participant files (in a standard format) and add such cases to a database within the state case management system.
- Successfully created training protocols necessary for state case initiation staff to use the new tribal case database to avoid duplication of state child support efforts when an existing tribal child support case exists.

Learned Lessons and Future Action

- Even when you have the best laid plans and an easy project, a pandemic can waylay your goals and efforts. Staffing and IT resources had to be diverted to necessary changes to all

IV-D programs to keep up levels of customer service. This additional grant project had to be delayed for a significant period because of those very necessary resource diversions.

- Personnel changes can affect efforts. The original three tribal IV-D directors and the original three tribal project coordinators were all replaced during the term of this grant. All new staff had to go through a significant learning curve in a longer than expected time.
- Oklahoma CSS and the three participating tribal IV-D programs continue to indicate that they hope to complete the project and conduct a more comprehensive evaluation of the outcomes.