

Date: Thursday, May 19, 2005

To: All DCS Child Welfare Staff

Fr: James W. Payne, Director Department of Child Services

Subj: Title IV-E Verification Process Changes

(DCS 05-06)

The purpose of this letter is to inform you of policy changes relating to the Title IV-E eligibility determination process. The changes relate specifically to the process of verifying that each eligibility criterion is met, and the requirements for recording verification sources in the ICWIS eligibility screens. The changes do not affect any other process for which staff gather documentation for a child's case record, or any other ICWIS module; Title IV-E eligibility verification is the only affected process.

These changes are the result of ongoing review and analysis activities aimed at streamlining operations, simplifying tasks, and clarifying policy so that all DCS staff may better serve the children of Indiana.

Changes contained in this letter replace policy found in Section 9, Appendix G of the Indiana Child Welfare Policy Manual (October 1995 Revision). A full revision of Section 9, including changes outlined in this letter, is in process and will be made available to all staff upon completion.

1) Elimination of Primary/Secondary Requirement

- *Old Policy* required the use of one "primary" verification source or two "secondary" sources for most Title IV-E eligibility criteria.
- *New Policy* eliminates the primary and secondary distinction. Any applicable and credible source of eligibility information shall be used as the sole verification for a given Title IV-E eligibility criterion.

Please note that the sole source of verification used under the new policy must be credible to the best of your knowledge, must clearly relate to the child, family, and time period for which eligibility is being determined, and must not be contradicted by other information in the child's case record. If discrepancies exist, staff must resolve them with additional research until such time as the preponderance of evidence allows for a determination of the facts in a given case. Staff are expected to exercise sound judgment and common sense in determining the credibility of source documentation. Staff must continue to place copies of verification sources used for Title IV-E eligibility determinations into the child's case record or Title IV-E eligibility file, and record verification sources in ICWIS. *Please note that other non-Title IV-E case record requirements are not affected by this change*.

2) Expanded Use of ICES

- *Old Policy* allowed use of ICES as a verification source only when the information was matched against an electronic data exchange (such as SDX, Bendex, etc.).
- *New Policy* allows screen prints from ICES to serve as single-source verification of all eligibility criteria, as long as the data displayed on the screen prints clearly relates to the child, family, and time period for which eligibility is being determined.

Under the new policy, staff are no longer required to obtain additional hard-copy validation of information in ICES as long as the printouts of the applicable screens ("screen prints") meeting the standards of the new policy are placed in the child's case record or Title IV-E eligibility file. Screen prints clearly identifying the child (or family) and the time period for which eligibility is being determined <u>must</u> be included in the child's case record or Title IV-E eligibility file if ICES is cited as the source of verification.

Please see Attachment B for lists of ICES screens that may be useful for determining whether a child meets specific eligibility criteria. Note that Attachment B is not an exhaustive list of useable screens in ICES, and the screens that are listed may not be useful for all cases. Staff are again expected to exercise sound judgment in the use of ICES data for purposes of Title IV-E eligibility, and should seek appropriate assistance if they have questions about the use of the system or the data it contains.

If a child and/or family are not found in the ICES system, or the system does not contain information pertaining to the time period for which eligibility is being determined, staff must obtain other, hard-copy sources of verification to prove eligibility (such as INS documents to prove legal alien status, employer statements/pay stubs or other documents to prove income, etc). There is no change in policy related to obtaining other, hard-copy sources of verification; staff should continue to follow the same process they are currently using to obtain this information.

Local office staff should contact their county ICES security coordinator to obtain ICES access. Central office and contract staff should contact Kate McHenry at 317-234-0533.

3) Changes to ICWIS Verification Screens

- Old Policy required staff to record the verification source used for each Title IV-E eligibility criterion from drop-down lists of specific documents in the ICWIS verifications screen.
- New Policy requires staff to record the verification source used by choosing from a streamlined list of broad "verification categories" into which the specific document used for verification fits.

Attachment A lists the broad verification categories that will be displayed in the ICWIS verification screen as of Monday, May 23, 2005. Please note that all of the documents currently listed in the ICWIS verification screen fall into one of the broad categories. Under new policy, staff must choose the broad category into which the specific source of verification most closely fits, and place a screen print from the ICES system (if applicable), or a hard copy of the verification source document into the child's case record or eligibility file. Verification sources relating to court language requirements will not change; court orders or transcripts of court proceedings remain the only acceptable sources of verification for Title IV-E court language requirements.

Example 1: Staff using ICES to verify the child's date of birth for Title IV-E eligibility purposes would choose "ICES" as the verification category in ICWIS, and would place hard copies of the ICES screen that clearly identifies the specific child and the date of birth in the child's case record or Title IV-E eligibility file.

Example 2: Staff using a bank statement as verification of a family's resources in the eligibility month would choose "Financial Institution Documents" as the verification category in ICWIS, and would place a copy of the bank statement into the child's case record or Title IV-E eligibility file.

Example 3: Staff using employer records or pay stubs to verify the family's income in the eligibility month would choose "Employer/Wage/Labor Organization Documents" as the verification source in ICWIS, and would place a copy of the document into the child's case record or Title IV-E eligibility file.

Questions regarding access or use of ICES should be directed to supervisors and/or the appropriate ICES security coordinator. For questions regarding the policy changes detailed in this letter, please contact DCS policy staff at DCSPolicy@fssa.in.gov. This policy change is effective as of the date of this letter.