CALIFORNIA DEPARTMENT OF CHILD SUPPORT SERVICES
P.O. Box 419064, Rancho Cordova, CA 95741-9064

Reason for this Transmittal

[ ] State Law or Regulation Change
[ ] Federal Law or Regulation Change
[ ] Court Order or Settlement Change
[ ] Clarification requested by One or More Counties
[X] Initiated by DCSS

April 5, 2005

LCSA LETTER: 05-07

ALL IV-D DIRECTORS

SUBJECT: POLICY INTERPRETATION REQUEST FORM AND INSTRUCTIONS

The Department of Child Support Services (DCSS) has completed an assessment of the policy interpretation request process in order to ensure that the Department provides the best possible services to local child support agencies (LCSAs). We are committed to providing complete and timely responses to these requests. However, due to the high volume of inquiries submitted through this process we can only accomplish this commitment through a collaborative effort with the LCSAs. Therefore, we have revised the process to better coordinate the efforts of DCSS and the LCSAs.

DCSS has incorporated a Policy Interpretation Request Form (DCSS 0014) which provides instructions to the designated LCSA Policy or Fiscal Coordinator, hereafter referred to as Coordinator, regarding the preparation, completion and submittal of policy questions resulting from an actual case or need for interpretation of specific policy or statute. The form has been designed to encourage the LCSA's participation in 1) reviewing all questions, 2) conducting preliminary research of the case or policy area needing clarification, and 3) citing all resources utilized in researching the issue prior to submitting any policy interpretation requests to the DCSS Policy Branch. DCSS will review the Policy Interpretation Requests submitted to determine the need for future policy development.

Preparing and Completing a Policy Interpretation Request

The revised process is to be used by any staff the LCSA determines appropriate when initiating and/or preparing a Policy Interpretation Request Form. However, the Coordinator is responsible for ensuring all Policy Interpretation Request Forms are complete prior to submittal to the DCSS Policy Branch. Each LCSA should utilize its own internal procedures in determining how LCSA staff and Coordinators work with one another in preparing the Policy Interpretation Request Form when submitting a request for a policy interpretation to the DCSS Policy Branch.

It is advisable to clarify any questions, if necessary, from the individual initiating the issue prior to submitting the request. Please be concise when preparing the Policy Interpretation Request Form and include relevant background information necessary to make the case absolutely clear. Please avoid the use of unique acronyms.

Preliminary research of the case, related policy or statute, should be conducted to determine if an answer has already been established. This may include, but not be limited to review of the following:

- California Code of Regulations at:
  http://www.oal.ca.gov/
- Federal Action Transmittals at:
  http://www.acf.dhhs.gov/programs/cse/
- Manual of Policies and Procedures at:
  http://www.childsup.cahwnet.gov/regulations/mpp.asp
- Child Support Services Letters at:
  http://www.childsup.cahwnet.gov/css04.asp
- Child Support Services Information Notices at:
  http://www.childsup.cahwnet.gov/cssin04.asp
- Local Child Support Agency Letters at:
  http://www.childsup.cahwnet.gov/lcsa04.asp
- Child Support Handbook at:
  http://www.childsup.cahwnet.gov/cshandbook.asp

If the Coordinator or appropriate staff concludes the research and is unable to find an established answer, the Coordinator should submit a Policy Interpretation Request Form citing any relevant background information gathered. Alternatively, if the Coordinator or appropriate staff concludes the research and formulates a proposed response which he/she believes addresses an issue and would like DCSS confirmation, the Coordinator may submit the proposed response via the Policy Interpretation Request Form.

Submitting a Policy Interpretation Request

The revised process is to be used by Coordinators when submitting a Policy Interpretation Request Form to the DCSS Policy Branch. The Coordinator will be responsible for ensuring that all the required fields are completed and any documentation (e.g., CSS Letter) and/or statute citation(s) utilized in researching an

issue are documented on the Policy Interpretation Request Form prior to submittal via email to the DCSS Policy Branch at policy.branch@dcss.ca.gov. A Policy Interpretation Request will be returned if it does not contain a specific question, does not provide a complete fact pattern, is a hypothetical scenario or is limited to comments on regulations. Incomplete Policy Interpretation Requests will also be returned to the LCSA Coordinator.

The electronic version of this letter and corresponding attachment (Policy Interpretation Request Form) can be accessed via the DCSS Public Website Reference Library indicated above under the heading "Letters and Notices" by clicking on the "Local Child Support Agency (LCSA)" icon and the appropriate year. A listing of LCSA letters for the corresponding year will be displayed. Click on the specific Letter Number you are interested in viewing. A separate Policy Interpretation Request Form (DCSS 0014) is accessible via the DCSS Public Website Reference Library under "Forms and Publications".

Outdated Policy Interpretation Requests

The Child Support Program has undergone tremendous change over the past several years. Numerous requests for policy interpretations have been received to which the DCSS could not respond due to limited staff resources. Most of those issues have either been addressed through subsequent regulatory or policy changes, or are no longer relevant. Therefore, any remaining, unanswered requests for policy interpretation dated prior to January 2004 will not receive a separate written response unless the question is resubmitted using the revised process outlined above.

If you have any questions or concerns regarding this process, please contact Tonya Crawford-Comage, Chief of the Financial Management and Interstate Section at (916) 464-5055.

Sincerely,

/os/

SANDRA O. POOLE
Deputy Director
Child Support Services Division

Attachment

POLICY INTERPRETATION REQUEST

DCSS 0014 FRONT (01/7/2005)

Before completing this form, please read the instructions on the reverse.

1. DATE OF REQUEST	2. REQUESTOR'S NAME	3. COUNTY

4. CASE NUMBER / FILE NAME	5. SUBJECT

6. ISSUE / PROBLEM:

7. POLICY QUESTION:

8. RELEVANT CITES:

Civil Code: Family Code: Policy Letters:

Code of Federal Regulations: Government Code: Probate Code:

Other:

9. LCSA SUGGESTED RESPONSE (Optional):

10. LCSA COMMENTS (Optional):

11. COORDINATOR'S NAME	12. DATE	13. TELEPHONE NUMBER	14. COORDINATOR'S E-MAIL ADDRESS

DCSS USE ONLY

DCSS Comments:

ASSIGNED ANALYST	MANAGER	DCSS ASSIGNMENT LOG #	FILE PATH

BRANCH CHIEF'S APPROVAL	DATE

INSTRUCTIONS FOR COMPLETING THE POLICY INTERPRETATION REQUEST

DCSS 0014 BACK (01/07/04)

Each local child support agency (LCSA) must complete a Policy Interpretation Request in order to obtain policy interpretations from the California Department of Child Support Services. The LCSA coordinator is responsible for ensuring that all the required fields listed below are completed and any resources utilized in researching the issue/problem are documented on the Policy Interpretation Request before submitting the request to the California Department of Child Support Services.

Incomplete Policy Interpretation Requests will be returned to the coordinator.

1. **Date of Request:** Required field. Enter the date the requestor completes the Policy Interpretation Request.

2. **Requestor's Name:** Required field. Enter the name of the individual who is completing the Policy Interpretation Request.

3. **County:** Required field. Enter the name of the county submitting the Policy Interpretation Request.

4. **Case Number/File Name:** Required field. Enter the LCSA's case number or file name.

5. **Subject:** Required field. Enter the subject of the policy interpretation, (e.g., arrears, foster case, case transfer, etc.)

6. **Issue/Problem:** Required field. Describe the situation that has created the need for a policy interpretation. Please include all relevant background information necessary to make the issue/problem absolutely clear. Include details that identify the case or case circumstances, (e.g., case aid status, UAP balances, support order amounts, etc.).

7. **Policy Question:** Required field. Concisely state the question(s) to be answered.

8. **Relevant Cites**: Required field.

9. **Suggested Response:** This is an optional field. If, after the coordinator or appropriate staff has completed the required research and formulates a proposed response to the policy question, the proposed response can be entered here and submitted to DCSS for confirmation.

10. **LCSA Comments:** This is an optional field. Enter any comments the LCSA may have regarding the issue/problem.

11. **Coordinator's Name:** Required field. Enter the name of the coordinator reviewing and verifying the completion of the Policy Interpretation Request before submitting the request to DCSS.

12. **Date:** Required field. Enter the date the coordinator submits the Policy Interpretation Request to DCSS.

13. **Telephone Number:** Required field. Enter the coordinator's telephone number.

14. **Coordinator's Email Address:** Required field. Enter the coordinator's Email address.