



# Bulletin

**NUMBER**

#14-75-01

**DATE**

Sept. 25, 2014

**OF INTEREST TO**

County Directors

Social Services and Child  
Support Supervisors and  
Staff

County and Tribal Attorneys

American Indian Child  
Welfare Initiative

Leech Lake and White  
Earth Child Support  
Supervisors and Staff

**ACTION/DUE DATE**

Please use for informational  
purposes

**EXPIRATION DATE**

September 25, 2016

## Child Welfare and Child Support Data Sharing Permitted

**TOPIC**

Federal regulations and Minnesota law allow the child support program authorized under title IV-D of the Social Security Act to disclose data with the child welfare program authorized under titles IV-B and IV-E of the Social Security Act.

**PURPOSE**

This bulletin provides a brief description, effective date, and the processes for the authorized data sharing between the Minnesota child welfare program and the Minnesota child support program.

**CONTACT**

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**SIGNED**

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**TERMINOLOGY NOTICE**

The terminology used to describe people we serve has changed over time. The Minnesota Department of Human Services (DHS) supports the use of "People First" language.

## **I. Background**

Previously, federal regulations were amended to permit child support agencies (authorized under title IV-D of the Social Security Act) to disclose a broader range of data to child welfare agencies (authorized under titles IV-B and IV-E of the Social Security Act). Specifically, the final regulations permitted disclosure of PRISM data and locate data on non-parent relatives of a child involved in a IV-B or IV-E case and allowed the data to be disclosed to the extent it is necessary to carry out the child welfare program's responsibilities.

However, Minnesota law was more restrictive than the federal regulation, so the child support program was not able to disclose locate data or child support computer system (PRISM) data on non-parent relatives. In 2012, bulletin #12-75-01 was issued outlining the process for data sharing involving the Shared Master Index (SMI).

In the 2014 legislative session, Minnesota Statutes Section 13.46, subdivision 2(a)(30) was amended to permit child support data on the child, the parents, and relatives of the child to be disclosed to agencies administering programs under title IV-B and IV-E of the Social Security Act. Effective July 1, 2014, IV-B and IV-E workers may now access data for the child, the parents, and relatives of the child using the procedures previously in place for child and parent data requests.

## **II. PRISM Data Requests**

Under the federal regulations child support agencies are permitted to respond to requests from authorized child welfare agencies for data from the computerized child support system (PRISM). The child support data elements that can be disclosed are not specifically defined but they are limited to the minimum data the requesting child welfare agency needs to meet its purpose. The available data may improve the provision of services to the child's entire family, and offer enhanced options for permanency.

The federal regulations specifically prohibit the child support program from releasing any Internal Revenue Service (IRS) or financial institution data match (FIDM) data and prohibit the release of data when the child support program has reasonable evidence of domestic violence or child abuse against a party or child and the release of information could harm the party or child

County and tribal child welfare agencies are not provided with direct access to PRISM. The SMI is available for county and tribal child welfare staff to access PRISM data. The SMI is a DHS computer system that links client data across the various DHS programs to provide state, county and tribal workers with a more holistic view of services a family or individual may be receiving, allowing better service for individuals and/or families. Clients may participate in multiple county and state programs and therefore be known to multiple systems. The SMI provides a common database for client demographic data and a comprehensive view of client participation.

## A. SMI Data Access

The following PRISM data is available through the SMI:

### Client Demographics

**Client:** Name (alias names), Spoken Language, Needs Interpreter (Y/N), Race/Ethnicity (Nationality), Marital Status, Gender, Date of Birth, Date of Death, Alien ID, Social Security Number (alias Social Security Number)

### Client Address

**Client:** Last Known Address, Phone Number

### PRISM Case Details

**Case:** Case ID, Status, Open/Closed Dates, Service Entity (County/Tribe)

**Parents:** Master Client Index Number, Name, Date of Birth, Role (Custodial Parent, Non-Custodial Parent)

**Child:** Master Client Index Number, Name, Date of Birth, Relationship to Custodial Parent and Non-Custodial Parent)

### PRISM Worker

**PRISM Worker:** User ID, Name, Service Entity (County/Tribe)

**Worker's Supervisor:** User ID, Name, Service Entity (County/Tribe)

The supervisor of any child welfare staff member needing access to the SMI should complete DHS Form 4442 the Service Delivery System Security Form available on DHS SIR.

Instructions for completing DHS Form 4442 can be found in [SIR](#). Also, [DHS Form 4442](#) is found in SIR.

## B. SMI Data Access Restrictions

- SMI does not display PRISM data for persons with a Conflict of Interest (COI) block
- SMI does not display relationships between children and excluded fathers;
- SMI does not display PRISM SSN status

## III. State and Federal Parent Locator Service Data

Under the federal regulations the child support agencies are allowed to respond to child welfare requests for state and federal parent locator service data. This data may be requested to facilitate the location of a parent who has or may have parental rights to a child and to facilitate the location of relatives of a child in the care of the child welfare agency in an effort to identify potential placements for the child.

The federal regulations permit child support agencies to share the following locate data on a parent (including an alleged or putative father) or child with authorized child welfare agencies:

- person's name,
- person's social security number,
- person's address,
- employer's name,
- employer's address,
- employer's identification number,
- wages, income, and benefits of employment, including health care coverage,
- type, status, location and amount of assets or debts owed by or to the individual.

The federal regulations permit child support agencies to share the following locate data on a non-parent relative with authorized child welfare agencies:

- person's name,
- person's social security number,
- person's address,
- employer's name,
- employer's address,
- employer's identification number.

## **A. Locate Data Requests**

County and tribal child welfare staff seeking to locate information should first submit a request for information in person (after presenting identification) or in writing by mail or fax (using agency letterhead stationery) to their county or tribal child support agency. Requests should only be submitted after the staff member has unsuccessfully searched for the person on the SMI or after the staff member has determined that the information he/she needs to administer his/her case is not available through the SMI.

The request for information of the parent, child, or relative of the child should include the following:

- the inquiring staff member's name and telephone number,
- the name of the agency they represent,
- the agency's case number for the child whose parent or relative the staff member is attempting to locate,
- the name of the person the staff member is looking for and the person's date of birth (if available), the social security number of the person the staff member is looking for (if available).

If there is no data available on the person the child welfare staff member is attempting to locate in the child support computer system, county or tribal child support staff will advise the county or tribal child welfare staff member to submit a request for Federal Parent Locator Service (FPLS) information to the State office. The child welfare worker should then fill out the ["Request for Information from the Federal Parent Locator Service" form](#)

The child welfare worker should send the completed form to the attention of the "Minnesota FPLS Coordinator" at the Department of Human Services Child Support Division, 444 Lafayette Road, St. Paul, MN 55155-3846 or by fax to 651-431-7517. The State FPLS

Coordinator will mail or fax back the requested information (if available) in a hard copy Word document.

## **B. Data Sharing Limitations**

Child support agencies cannot:

- release IRS or FIDM data to the child welfare program;
- release information to the child welfare program when the child support program has reasonable evidence of domestic violence or child abuse against a party or child and the release of information could harm the party or child (those cases flagged with the domestic violence indicator).

## **Americans with Disabilities Act (ADA) Advisory**

This information is available in accessible formats for people with disabilities by calling (651) 431-4199 (voice) or toll free at (800) 657-3954 or by using your preferred relay service. For other information on disability rights and protections, contact the agency's ADA coordinator.