QUESTIONS AND ANSWERS FOR
TRIBAL APD PROCESS AND OTHER MTS ISSUES

Section 1: Model Tribal System General Information

The MTS is an automated child support system, designed using tribal requirements, specifically for the management of tribal child support programs. The project is managed by the Administration for Children and Families' Office of Child Support Enforcement (OCSE).

Question 1.1: What options are available to automate my tribal child support program?

Answer 1.1: The regulation at 45 CFR 310.5 allows five options for tribes seeking to automate tribal child support programs. Options one through four below are funded with Federal Financial Participation (FFP). However, the fifth option is not eligible for federal funding. The options are:

1) Implement the MTS
2) Office Automation
3) Implement an existing tribal system
4) Implement an existing state system
5) Develop an automated solution using tribal-only funding

Here are some issues to consider in determining the best option:

- Do you have an existing child support system and is it meeting your needs?
- How old and complex is your existing system?
- How long has your program been operating?
- What is your annual child support budget?
- How many staff do you have?
- Do you have multiple offices?
- How many cases do you manage?
- How much is your caseload expected to grow?
- Do you have geographical challenges with getting information technology (IT) support?
- Are your program processes and procedures sufficiently documented?
- What is the level of expertise of your existing IT support?
- What are your other tribal priorities?
- Do you operate other ACF programs?
- How much staff time and effort could be saved by an automated system?

Tribes interested in implementing an automated system (tribal, state, or MTS) must be prepared to give the project the priority it will require to succeed, such as committing the necessary resources, time, and finances.

Question 1.2: Where can I find out more about the MTS, including functionality, technical documentation, news about the MTS, and training presentations?

Answer 1.2: OCSE publishes a monthly newsletter, "The MTS Flash". Detailed descriptions of the MTS functionality, technical documentation, and all previous communications can be found on our website at www.acf.hhs.gov/programs/css/tribal-systems. If you conduct a search for "MTS" on the OCSE website, you will find the complete list of all MTS documents. If there is something you cannot find, please contact us at MTSProject@acf.hhs.gov.

Question 1.3: What are the personal computer hardware and server configuration recommendations for use with the MTS?

Answer 1.3: The configuration recommendations, distributed to all tribes in PIQT-13-01 are reviewed and updated regularly. The most recent version can be found on our website - www.acf.hhs.gov/programs/css/tribal-systems. It is important to consider these recommendations before purchasing computers and servers. We designed these recommendations to ensure that tribes have the latest technological equipment and software.

Question 1.4: How can our tribe get a demonstration of the MTS?

Answer 1.4: Send an email to MTSProject@acf.hhs.gov and OCSE will arrange a demonstration.

Question 1.5: What are the four MTS implementation options available to tribes?

Answer 1.5: There are four options:

1) OCSE Supported: Use OCSE support with installation, testing, and configuration activities (similar to our work with the Modoc Tribe of Oklahoma and Forest County Potawatomi Community).
2) Independently Supported: Receive the MTS system and use your own internal or contracted information technology resources to manage the installation, testing, and configuration activities.
3) Tribal Organization Supported: Join a tribal organization such as a consortium, or tribal services group. These groups are comprised of one lead tribe with several member tribes. We expect there will be several tribal organizations offering a range of services from training to comprehensive IT support. See Question 1.6 for more information.
4) Self-Implementing: Receive/install, test, and configure the MTS using internal or contract information technology resources and then alter or expand it for your tribe's unique business processes.

Each option has many implications for your tribe. The chart below highlights a few of the major points that you should consider as you choose a path that fits your needs.

The first three options will allow you to continue to receive and accept system updates from OCSE as the MTS continues to evolve. OCSE will continually gather feedback from tribes to

adjust the system, and to add functionality in order to keep pace with the growing needs of the tribal child support program. If you choose the Self-Implementing path, although you will be able to make whatever changes you want, it will limit the amount of support you receive from OCSE in the future. This is because changes made to your system may not resemble the original MTS and any changes OCSE incorporates to the MTS may not be compatible with changes a Self-Implementing tribe may have made to their version of the MTS.

Major implications of the implementation paths:

	Who provides technical implementation support?	Will tribes have input on changes to the MTS?	Will tribes be able to obtain new releases?	Will tribes be able to obtain help desk support from OCSE?
OCSE Supported	OCSE (based on resources)	Yes, as members of the Change Control Board	Yes	Yes, during installation, very limited thereafter
Independently Supported	Tribal Resources (internal or contractual)	Yes, as members of the Change Control Board	Yes	Very limited, based on available resources
Tribal Organization Supported	Lead Tribe	Yes, through the Lead Tribe who will serve as your representative on the Change Control Board	Yes, through the Lead Tribe	No, support is provided by the Lead Tribe
Self-Implementing	Tribal Resources (internal or contractual)	No	Yes, but you will need to do extensive testing prior to using any new MTS releases	No, some limited initial technical support is possible

Question 1.6: Can I make changes to the MTS based on the needs of my tribe?

Answer 1.6: Yes. The MTS has a configuration module that allows the tribe to select a wide range of options in how the system will perform and operate. Examples of configurable items include:

- how the MTS will handle different types of data (automatically update or require the user to confirm they want the data updated);
- how it will print documents (locally or centrally);
- what interest rate it will charge on arrears debts ;
- what logos and other graphics are displayed on documents; and
- what other items needed to ensure the system works for each tribe according to their specific policies.

MTS configuration options include:

Configuration Areas	Options
Tickler Configuration: MTS has 80 different ticklers (alerts) to keep workers informed of case progress.	- Use of all ticklers - Timing of all ticklers - Create customized ticklers
Document Configuration: MTS has 126 documents that can be generated from pre-defined templates.	- Document appearance and content - Create unlimited additional document templates
Office and Worker Configuration: MTS can be configured to support multiple offices, and supervisors have many options for their case workers.	- Assignment of cases to a worker within an office - Movement of cases between offices - Assignment of caseworkers to roles - Assignment of caseworkers to an alphanumeric range for automatic assignment of cases
Financial Configuration: MTS can be configured to align with your tribe's specific financial processes and policies.	- Automated distribution of current support, arrears, fees, in-kind, etc. - Pass-through of current support - Pass-through of arrears - Direct deposit and debit card processing - Interest on child support arrears and TANF arrears - Check printing - Automated and manual bank account reconciliation

Configuration Areas	Options
Check Configuration: Checks generated by the MTS have 22 configurable parameters to meet your tribe's needs.	• Signatures (number and placement) • Logo • Micron encoding • Watermarks • Payment stub • Check content (e.g. case information, address, etc.)

Outside of these areas, tribes may choose to make other changes to the system. However, if a tribe has chosen to modify its version of the MTS outside of OCSE's periodic updates, the tribe will no longer be aligned with the current version of the MTS. This means that prior to accepting any system updates from OCSE, the tribe will need to do extensive testing to ensure that the new update will be compatible with and will not damage its version of the MTS.

Question 1.7: What is a tribal organization?

Answer 1.7: For the purposes of the MTS, a tribal organization is comprised of a lead tribe THAT has experience with the MTS and is available for hire by other member tribes. If you choose the "Tribal Organization Supported" path you will be hiring a lead tribe to provide one or more services, such as MTS implementation, operations, and/or maintenance on your behalf. These organizations can provide a range of services, including training, data clean-up, data conversion, help desk services, hosting, software maintenance, and software development. In this instance, the term "Tribal Organization" is specific to operation of a MTS and does not change the definition of "Tribal Organization" found at 45 CFR 309.05.

Question 1.8: What is a lead tribe?

Answer 1.8: A lead tribe is a tribe that serves as the head of a tribal organization and offers MTS services to member tribes. See Question 1.7 for more information.

Question 1.9: What is a member tribe?

Answer 1.9: A member tribe is a tribe that belongs to a tribal organization and purchases MTS support from a lead tribe. See Question 1.7 for more information.

Question 1.10: Is there a MTS help desk for "OCSE Supported" tribes?

Answer 1.10: Yes. When a tribe chooses the "OCSE Supported" pathway it will be given a phone number for both technical and end-user support throughout the implementation period. The exact hours of the help desk are negotiated with each tribe, as determined by the tribe's needs and documented in the tribe's memorandum of understanding (MOU). See question 2.5 and 2.16 for more information on MOU's.

Question 1.11: How long does it take to implement the MTS?

Answer 1.11: For a tribe with 500 cases, it may take up to 6 months. The implementation phases and activities are listed below.

Implementation Phases	Activities Included
Planning and Acquisition	• Evaluating the existing IT infrastructure • Writing the Advance Planning Document (APD). See section 2 for more information on APDs • Getting APD approved • Acquiring needed hardware and software
Installation Preparation	• Reviewing current business practices • Documenting the "as is" process • Documenting new business processes that need to be adjusted because of the MTS • Gaining stakeholder approval of the new processes
Installation and Preliminary Test	• Installing the physical MTS test, production and development environments • Reviewing configuration options and setting up the desired configuration • Developing test data and entering it into the MTS for testing purposes • Running preliminary tests to ensure that the system was configured appropriately
Conversion	• Training staff who will be using the MTS • Instituting a help desk to assist end-users • Converting cases from the tribe's existing system to the MTS (either manually or automatically) • Reviewing the converted data to ensure that the data transferred correctly • Fixing or entering any data that was not converted or was not converted completely
Document Preparation	• Identifying all documents that will need to be created or modified to support tribal business processes • Creating/updating existing MTS document templates to align with tribal practices • Creation of test data needed to test the documents • Creation of new templates as-needed • Reviewing completed documents and verifying them with needed stakeholders

As a Sample: The six-month project may look similar to this:

	Jan	Feb	March	April	May	June
Planning and Acquisition	▓	▓				
Installation Preparation		▓	▓	▓		
Installation and Preliminary Test			▓	▓		
Conversion				▓	▓	
Document Preparation					▓	▓

It is important to note that this is merely an example used for illustrative purposes. The length of individual implementation will vary based on the number of cases needed to be transferred, available resources, schedule, and other factors.

Question 1.12: How much does the MTS cost?

Answer 1.12: The MTS has no built-in licensing costs or fees for any of its components; including the database, document management software, programming code, and documentation. The only expense is for the installation, maintenance, and ongoing operation of the system. These costs will vary depending on a number of factors, including:

- How many existing cases need to be cleaned-up, converted, or transferred?
- How many employees will need to be trained?
- Which implementation services can be performed by the tribe or need to be contracted out?
- Is new hardware or software required?
- Who will maintain and operate the MTS on the tribe's behalf?

For illustration purposes, the table below provides an approximation of the costs for installing the MTS in a tribe with 500 cases. As such, tribes should expect variations based on the required activities, including those performed "in-house" or through a contract.

Item	Approximate Cost
Tribal Staff – System administrators, caseworkers, financial specialists, supervisor.	33,000
Contracts – Data entry, installation support services, wiring, and cable.	35,000

Item	Approximate Cost
Hardware/Software – For server.	8,000
Local Travel – Training attendance.	500
Training – Windows 7 and Red Hat Linux Usage.	3,000
Computer Supplies – backup tapes, printer paper, printer cartridges, etc.	500
Total	$80,000

Question 1.13: What is the current MTS National Launch Plan?

Answer 1.13: OCSE began the National Launch in June of 2013. Current planning is for OCSE to install the MTS in new tribal child support programs as resources become available and tribes submit APDs.

Question 1.14: Is there a time limit to decide whether to implement the MTS?

Answer 1.14: No. Comprehensive tribes may decide to implement the MTS at any time by contacting OCSE and submitting an APD. The exact timing of the actual implementation will depend on the negotiated schedule in the APD and, if support is required, on the available resources of the tribal organization or OCSE.

Question 1.15: Can a start-up tribe receive funding to perform MTS installation activities?

Answer 1.15: No. As stated at 45 CFR 310.20(a)(1), a tribe must have comprehensive status prior to submitting an APD for federal funding. If a start-up tribe is considering implementing the MTS there are limits as to what and when MTS-related activities can begin. For example, some activities that can be done include attending demos of the system, and working on tribal policies that facilitate the installation and configuration of the MTS after the tribe becomes comprehensive. However, actual implementation activities, such as purchasing hardware and software, attending training, and other system implementation activities are not permissible during start-up.

Section 2: Advance Planning Document (APD)

APD is defined at 45 CFR 95.605 and can be used according to 45 CFR 310.20(a)(1) by a comprehensive tribe seeking FFP to install the MTS, a state system, another tribal system, or to make improvements to their installed copy of the MTS, state, or tribal system.

Question 2.1: When do I need an APD?

Answer 2.1: You must submit an APD if you need FFP to support your IT needs. If the tribe is using office automation, the funding is though the Annual Budget submission. If the tribe plans to build its' own system, no APD is needed, as these costs are ineligible for federal funding.

Question 2.2: What goes into an APD?

Answer 2.2: The regulations at 45 CFR 310.20(a)(2) mandate that an APD must:

- represent the sole systems effort being undertaken by the comprehensive tribal IV-D agency under this part;
- describe the projected resource requirements for staff, hardware, software, network connections, and other needs and the resources available or expected to be available to meet the requirements;
- contain a proposed schedule of project milestones with detail sufficient to describe the tasks, activities, and complexity of the initial implementation project;
- contain a proposed budget including a description of expenditures by category and amount for items related to installing, operating, maintaining, and enhancing the computerized tribal IV-D system; and
- contain a statement that the comprehensive tribal IV-D agency agrees in writing to use the computerized tribal IV-D system for a minimum period of time.

Question 2.3: Does my APD need to include copies of my contracts?

Answer 2.3. Yes. Per 45 CFR 310.25(b), contracts should be provided when a procurement is anticipated to or will exceed the Simplified Acquisition Threshold amount ($100,000). In accordance with 45 CFR 310.25(d), OCSE may request to review related procurement documents under the Simplified Acquisition Threshold. This AT serves as the written request for draft copies of any related contracts with your APD, including those under the Simplified Acquisition Threshold. OCSE reviews these documents to ensure a comprehensive review of the project before providing funding approval.

Upon approval of the APD, the tribes must submit final signed copies of any procurement documents.

Question 2.4: If I am hiring a tribal organization to assist me with implementation is a competitive procurement process required?

Answer 2.4: Yes. Per 45 CFR 92.36 Procurement, tribes are required to conduct procurements in a manner providing full and open competition. However, if the planned acquisition is less than the Simplified Acquisition Threshold ($100,000), OCSE may approve a limited competitive procurement, such as a single source or sole source acquisition (per 45 CFR 310.1(a)(10)). Limited competitive procurements over the Simplified Acquisition Threshold may require additional justification prior to approval of funding for their costs by OCSE.

Question 2.5: Is there an APD template available to assist me in developing my APD?

Answer 2.5: Yes. The template can be found at: www.acf.hhs.gov/programs/css/resource/tribal-apd-template.

Question 2.6: What costs are allowable for installation?

Answer 2.6: According to 45 CFR 310.1(a)(4), installation is defined as the act of installing automated data processing equipment and software, performing data conversion, and turnover to operation status. Possible examples include:

- new equipment and software;
- system installation activities (be they for the MTS, a state, or another tribe's IV-D system) including tribal IT and program salaries,
- staff time to clean up and enter case data,
- software configuration,
- system testing, and attending and conducting end-user training;
- system enhancement (be it for the MTS, state, or another tribe's IV-D system);
- operating and other costs charged by a state or another tribal IV-D program for use of their system; and
- any other costs incurred to operate and maintain the MTS, state system or another tribe's system.

See question 2.14 for more information on funding of operations and maintenance costs.

Question 2.7: How much money is available for MTS installation?

Answer 2.7: Per 45 CFR 310.20(a)(4)(i), the total acquisition cost for which federal funding is being sought in an APD cannot exceed the program's total grant award for the federal fiscal year in which the request is made.

Question 2.8: Can I get help with my APD prior to submission?

Answer 2.8: Yes. When you are ready to begin drafting your APD, please contact us to arrange a technical assistance teleconference and we will provide assistance in drafting your APD. We also encourage you to share a draft of your APD before formally submitting the final version. We are here to help you throughout this process. If you have any questions, you can email them to MTSProject@acf.hhs.gov.

Question 2.9: When should I start working on our tribe's APD?

Answer 2.9: We suggest starting to work on your tribe's APD as soon as you have secured approval for the match funds through your tribal council or other internal processes. It is important that you have done all of the internal vetting and reviewed your own internal processes prior to submitting your APD. Please provide ample time for us to review the APD, including any time for OCSE to review working drafts. Our goal is to provide a final, formal review for approval within 60 days of the official submission.

Question 2.10: If I am implementing the MTS with a tribal organization, do I still need an APD?

Answer 2.10: Yes. Originally, OCSE planned for and anticipated providing tribes flexibility with the APD process, including allowing a lead tribe in a tribal organization to submit an APD on behalf of member tribes. Subsequently, OCSE determined that there were concerns with this approach, as described below.

1) There would be difficulty separating and documenting funding transferred between the tribes and the exact amounts allocated to each.
2) Fiscal and legal risks for OCSE and tribes would increase in the event of conflicts between the lead tribe and its members.
3) There may be difficulty proceeding in the event of a contractual dispute once the lead tribe had already received the funding.
4) There has to be a clear contractual relationship between OCSE and each tribe that aligns with the funding provided.
5) After a complete review of the policy and regulatory documents, OCSE determined we do not have a clear regulatory basis upon which to authorize parties, in this case lead tribes, to submit APDs on behalf of a member tribe.

Based on these concerns and the regulations outlined in 45 CFR Part 310 and Part 95, OCSE amended its decision to allow flexibility on APD submission. As such, we can only accept APDs directly from member tribes. In addition to alleviating risk, this decision aligns the process for tribes with the process for states in that each tribe will have its own source of funding.

See question 1.7-1.9 for more information on tribal organizations, lead tribes, and member tribes.

Question 2.11: What is the official submission process for an APD?

Answer 2.11: Per 45 CFR 310.20(6)(b), APDs should be sent to OCSE, Office of the Commissioner, ATTN: Division of State and Tribal Systems. If you are also sending your documents electronically, please forward a copy to MTSProject@acf.hhs.gov and to your regional program specialist. Your APD submission must be approved and signed by the tribal child support program director and the appropriate tribal officials.

Question 2.12: What can I expect once the APD is submitted?

Answer 2.12: When your APD is received, OCSE will send a formal acknowledgement letter that your APD has been received. If there are questions, we will contact you for more details or information. The goal is to provide our APD review within 60 days of submission. Once the APD is approved, an official approval letter signed by the OCSE Commissioner will be sent to the tribe. This letter will include the approved amount of your award and will be followed by an official notice of grant award letter sent from the Administration for Children and Families, Office of Grants Management.

Question 2.13: What is the funding timeframe of a typical APD award?

Answer 2.13: APD funding is typically awarded for a period of one year. Since most installations take less than 12 months, this gives the tribe ample time to complete the implementation and expend the funding.

Question 2.14: How/When do MTS costs transition from an APD to our annual child support program budget?

Answer 2.14: With the typical MTS installation taking less than twelve months, a tribe has the option of including operations and maintenance costs in the APD for the remainder of the federal fiscal year, or immediately submitting an amended annual program budget to fund ongoing operations and maintenance after installation is completed. Beginning with the start of the next federal fiscal year after an MTS installation is finished, all subsequent operations and maintenance costs are to be submitted as line items under the tribe's annual program budget request.

Question 2.15: Can a tribe roll over unspent APD funds into an annual child support program budget/grant funds?

Answer 2.15: No. Unlike program grant funds, up to 10 percent of which can be redirected to program activities other than that for which the money was originally requested, funding under an APD is specific to both the time period for the APD (one year) and the activities for which the money was approved.

If there is money remaining, you may submit an APD Update to request repurposing of the remaining, unspent funding. The other option is to communicate in writing to OCSE of any funding left over, and if so, how much. We will then de-obligate those funds.

Question 2.16: What is a memorandum of understanding (MOU) as it relates to the MTS?

Answer 2.16: A MOU is a signed agreement between OCSE and a tribe that is implementing the MTS. The MOU outlines the roles and responsibilities of the tribe and OCSE as it relates to the system implementation and ongoing use of the MTS. The MOU must be signed by both the tribe and OCSE prior to the approval of the APD. The MOU will be tailored to your tribe and to your

specific installation of the MTS. You may find a sample MOU attached to the APD Template at:
www.acf.hhs.gov/programs/css/resource/tribal-apd-template.

Section 3: MTS Change Control Board (CCB)

The MTS CCB is the entity that drives all changes to the MTS. The CCB is responsible for the systematic identification of system issues, defects, change requests, and enhancements that must be prioritized, designed, developed, and tested prior to being rolled out to tribes. The CCB evaluates all reported problems and requested changes with the system and determines how those problems should be addressed, at what priority level, and when they should be corrected.

Question 3.1: Who is on the CCB?

Answer 3.1: The CCB membership includes one voting representative from all tribes operating their own version of the MTS, including OCSE Supported tribes, Tribal Organization Supported lead tribes, and Independently Supported tribes. OCSE leads and facilitates the CCB. Tribes not participating on the CCB include Self-Implementing Tribes, Tribal Organization Supported member tribes, and any tribes not using the MTS.

Question 3.2: Why can't Tribal Organization Supported member tribes participate on the CCB?

Answer 3.2: Member tribes are represented at the CCB meetings by their lead tribe. The lead tribe is responsible for gathering input as needed from its members to ensure that everyone has a voice in this process. MTS member tribes are invited to listen to the meetings to hear the conversation, but only CCB members can vote.

Question 3.3: How do any of the current procedures of the CCB change?

Answer 3.3: If a tribe wishes to propose a change to the existing process, they may bring it before the CCB for a vote. Any changes in process require a majority vote and concurrence from OCSE.