

CALIFORNIA DEPARTMENT OF CHILD SUPPORT SERVICES

P.O. Box 419064, Rancho Cordova, CA 95741-9064



February 12, 2019

CSSP LETTER: 19-02

ALL IV-D DIRECTORS
 ALL COUNTY ADMINISTRATIVE OFFICERS
 ALL BOARDS OF SUPERVISORS

SUBJECT: SUPPRESSIONS

PURPOSE: This letter provides policy to local child support agencies (LCSAs) regarding the use of suppressions on child support enforcement actions. Establishment of a statewide suppression policy will ensure that LCSAs apply manual suppressions in a consistent manner that complies with federal and state laws and regulations.

POLICY: To ensure statewide uniformity in setting manual suppressions that align with the program mission to provide child support services to establish parentage and collect support:

- Suppressions shall not be placed on Financial Institution Data Match (FIDM) or Multistate FIDM as these are locate tools. Suppression of FIDM does not prevent the generation of bank levies.
- Suppressions shall not exceed a period longer than 12 months, with the exception of bankruptcy and interest suppressions. This timeframe is established to support the effectiveness of the program and ensure child support collection activities continue without disruption. Suppressions may only be extended beyond 12 months upon an annual review for appropriateness and compliance with applicable laws and regulations.
- Credit reporting must be suppressed for NCPs who qualify for relief under FC Section 4007.5 once an administrative or judicial adjustment to the support order has been made.
- Bankruptcy suppressions shall be placed and reviewed in a manner determined in consultation with LCSA legal counsel.
- Interest suppressions require financial oversight and therefore must be placed by a financial worker. This requirement ensures that appropriate internal controls and separation of duties are in place. A caseworker may identify that interest suppression is needed only when directed by:

Reason for this Transmittal

- State Law, Regulation and/or Change
- Federal Law, Regulation Change
- Court Order or Settlement Change
- Clarification requested by One or More Counties
- Initiated by DCSS

- court order.
- active out-of-state order.
- Income Withholding Orders may only be suppressed at the Supervisory level, as identified by the caseworker, to place suppressions under the following circumstances:
 - it is court ordered that the wage assignment be stayed,
 - parties file a formal stipulation with the court and NCP is compliant every month,
 - social security derivative benefits exceed the court ordered obligation.
- All suppressions must include an end date to facilitate review of the suppression, its appropriateness, and determination whether and/or when enforcement activities should resume.

BACKGROUND: Pursuant to Family Code (FC) § 17500, LCSAs are granted authority and responsibility for promptly and effectively collecting and enforcing child support obligations. LCSAs must consider a number of circumstances impacting the noncustodial parent's (NCP) and custodial party's circumstances, such as bankruptcy filings, when pursuing appropriate enforcement actions.

ACTION: LCSAs shall adhere to this policy when applying enforcement suppressions.

CONTACT: If you have any questions or concerns regarding this matter, please contact the Policy and Program Branch at (916) 464-5883.

Sincerely,

o/s

VICKIE K. CONTRERAS
Deputy Director
Child Support Services Division