

CALIFORNIA DEPARTMENT OF CHILD SUPPORT SERVICES

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



June 18, 2003

CSS LETTER: 03-11

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

SUBJECT: USE OF FILE TRANSFER PROTOCOL (FTP) FOR ELECTRONIC FILE
 TRANSMISSIONS

Federal regulations 45 CFR 307.10(b)(11) and 307.13(a) provide guidance for the securing of data. In effect, they state that each local child support agency is responsible for providing security to prevent unauthorized access to or use of the data in the system and that sufficient safeguards are required to ensure the integrity, accuracy, completeness, and appropriate access and use of data. These safeguards should be documented through written policies and address data access and the sharing of data with other persons or entities. The purpose of this letter is to establish the initial steps and policy for data transmissions in accordance with the above directives.

This letter is to notify the local child support agencies (LCSAs) of new requirements for transmitting electronic files to the State for child support processes. The Department of Child Support Services (DCSS) is requiring LCSAs to transition to the use of File Transfer Protocol (FTP) for all electronic file transmissions to and from DCSS and other State agencies responsible for child support program functions as an initial step to increase the security of confidential child support related information. For example, DCSS currently receives the LCSA input files through a variety of electronic means such as CD-ROM, diskettes, and mainframe tapes which are mailed to DCSS and then forwarded to the Health and Human Services Data Center for processing. This process is time consuming and requires numerous people to handle the data files increasing security risks.

DCSS-SY-2003-CTY-0089

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
- Initiated by DCSS



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The FTP transmission protocol enables a secure transmission of data to be exchanged between the sending and receiving organizations. The data content typically transmitted in this fashion, for example, data transmitted to the Integrated Database (IDB), contains confidential or highly sensitive information, and as such, extra care must be taken to ensure that this information is distributed in as secure a connection as reasonable. Please note that the use of the FTP protocol is unrelated to electronic mail.

As the prevalence of computer-related theft and intrusions have increased, we believe that our diligence in this area must improve to safeguard our customers, their associated data, and to protect the integrity of child support administration throughout the State. As we continue to evaluate the threat to information security, additional measures such as the use of data encryption techniques may be considered in the future as a means to better protect our data assets from misuse.

If you have any questions or concerns regarding this matter, please contact Michele Rappleye, DCSS Information Security Officer, at (916) 464-5600.

Sincerely,

JOAN OBERT
Deputy Director
Technology Services Division