

June 1998

# CHILD SUPPORT ENFORCEMENT

## Certification Process for State Information Systems



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**Accounting and Information  
Management Division**

B-279010

June 15, 1998

The Honorable Daniel Patrick Moynihan  
Ranking Minority Member  
The Honorable John D. Rockefeller IV  
Committee on Finance  
United States Senate

This report responds to your request that we review the Department of Health and Human Services (HHS) certification process for state child support enforcement systems and its administration of the process and determine the certification status of the state systems. The Family Support Act of 1988 requires states to obtain HHS certification that their child support enforcement systems meet federal requirements. All states were to obtain this certification by October 1, 1997, or face the possibility of substantial financial penalties for noncompliance after the deadline.<sup>1</sup>

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**Results in Brief**

Certification guidance issued by the Office of Child Support Enforcement (OCSE) addresses the system requirements of the Family Support Act of 1988 and HHS' implementing regulations. Our analysis of the certification process shows that OCSE has administered this process consistently across states since it began certifying child support enforcement systems in 1993. It has used the same guidance for certification reviews and conducted reviews that were similar in scope and length for each level of certification. While OCSE published many certification reports on the results of its certification reviews, its reporting was not always consistent. For example, six preliminary certification review reports included an inaccurate description of the criteria against which the systems' financial components were measured. As of March 31, 1998, OCSE had either certified or conditionally certified 25 of the 54 child support enforcement systems.<sup>2</sup> OCSE had also conducted 13 additional reviews and was preparing certification reports<sup>3</sup> for those systems.

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<sup>1</sup>Legislation to reduce the penalties for failure to certify state systems was pending as of March 31, 1998.

<sup>2</sup>The 54 state systems consist of systems for the 50 states and for the District of Columbia, Guam, Puerto Rico, and the Virgin Islands. The term system refers to the hardware and software components of the child support enforcement systems.

<sup>3</sup>OCSE conducted the review for one state during the week of March 30, 1998, and began preparing that state's report on April 6, 1998.

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## Background

The Child Support Enforcement Program was established in 1975 to help strengthen families and reduce dependence on welfare by helping to ensure that the responsibility for supporting children was placed on parents. The states operate programs to locate noncustodial parents, establish paternity, and obtain support orders, along with enforcing actual collections of those court-ordered support payments. The federal government—through OCSE—funds 66 percent of state administrative and operating costs, including costs for automated systems, and up to 90 percent of expenses associated with planning, designing, developing, installing, and/or enhancing automated systems.

The Family Support Act of 1988 required that statewide systems be developed to track determination of paternity and child support collections. To address that requirement, OCSE developed regulations and guidance for conducting certification reviews. In 1993, OCSE published a certification guide,<sup>4</sup> which addresses the functional requirements for child support enforcement systems. In general, the certification guide requires that the systems be operational, statewide, comprehensive, and effective and efficient. The guide also provides 53 specific requirements, which are grouped into the following categories: case initiation, location of parents, establishment of paternity, case management, enforcement, financial management, reporting, and security and privacy. (See appendix I for the system regulations and appendix II for descriptions of the guide's specific requirements by category.) The guide was developed to help OCSE's analysts ensure that certification reviews are conducted consistently—using the same criteria and standards for documentation. The analysts use the certification guide in conducting certification reviews, and states refer to it in preparing for their certification reviews.

To ensure that states are meeting the functional requirements specified in the certification guide, OCSE also developed a certification questionnaire.<sup>5</sup> The questionnaire provides a series of questions for analysts' use in determining if the states' systems address the functional requirements. The format and content of the questionnaire mirror those of the certification guide. In addition to the certification guide and questionnaire, OCSE has provided supplementary guidance to (1) aid in developing and testing specific areas such as financial requirements and (2) clarify and expand

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<sup>4</sup>Automated Systems for Child Support Enforcement: A Guide for States, U.S. Department of Health and Human Services, Administration for Children and Families. (Revised June 1993.) (This guide replaced draft guidance distributed in November 1992.)

<sup>5</sup>Automated Systems for Child Support Enforcement: Child Support Systems, Certification Questionnaire, U.S. Department of Health and Human Services, Administration for Children and Families. (Revised January 1994.)

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upon the requirements provided in the certification guide and questionnaire.

OCSE uses its guidance to ensure that its staff consistently perform three types of certification reviews: functional, level 1, and level 2. A functional review occurs early in the development of a system before it is operational in a pilot site. During functional reviews, analysts evaluate parts of the system against the certification requirements to inform the state of the work that remains before its system can be certified. A level 1 review occurs when an automated system is installed and in operation in one or more pilot locations. (OCSE created this level of review in 1990 due to state requests for agency guidance prior to statewide implementation.) A level 2 review occurs when the system is considered by the state to be operational statewide.<sup>6</sup> This review is required for final certification. Systems are granted full certification when they meet all functional requirements and conditional certification when the system needs only minor corrections that do not affect statewide operation. According to OCSE analysts, states whose systems receive either type of level 2 certification are exempt from penalties for failing to meet system requirements imposed by the Family Support Act.

The Family Support Act of 1988 set a deadline of October 1, 1995, for implementation and federal certification of such systems. However, when only a few states met the deadline, the Congress passed legislation extending it by 2 years, to October 1, 1997. Current law requires HHS to impose substantial financial penalties on states that did not have certified child support enforcement systems by October 1, 1997. The Congress, under the House bill HR 3130 with Senate modifications SP 2286, is considering legislation to reduce those penalties. OCSE certified 17 states by the extended deadline and another 8 states since the deadline (as of March 31, 1998).

In June 1997 we made several recommendations designed to strengthen OCSE's oversight of child support enforcement systems. Specifically, we reported that the certification reviews are conducted too late for effective oversight.<sup>7</sup> Because the reviews are conducted toward the end of the system development projects, the reviews come too late for timely

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<sup>6</sup>According to OCSE analysts, if a state had a level 1 review prior to its level 2 review, the scope of the level 2 review may be limited to those problems identified during the level 1 review.

<sup>7</sup>Child Support Enforcement: Strong Leadership Required to Maximize Benefits of Automated Systems (GAO/AIMD-97-72, June 30, 1997).

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redirection of systems development without significant costs being incurred.

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## Objectives, Scope, and Methodology

Our objectives were to determine (1) whether HHS' certification guidance addresses the system provisions in the Family Support Act of 1988 and implementing regulations, (2) whether HHS has consistently administered the certification process, and (3) the certification status of the state systems. Our work was done to determine whether OCSE's certification guidance completely addresses the system requirements in the act and supporting regulations; it does not determine the overall adequacy of OCSE's certification review process. This issue was addressed in our June 1997 report,<sup>8</sup> in which we identified weaknesses in HHS' oversight of these systems, including the timeliness of the certification reviews.

To document the certification process, we obtained and analyzed OCSE's guidance for certifying child support enforcement systems. To determine whether this guidance addresses the legal and regulatory requirements for child support enforcement systems, we compared the certification guide and questionnaire to the child support enforcement system regulations. We also analyzed whether the regulations addressed the system provisions of the Family Support Act of 1988.

To determine whether OCSE consistently administered the certification process, we obtained and reviewed all certification reports issued as of March 31, 1998, and assessed how OCSE officials at headquarters and in one regional office plan, administer, and report the results of certification reviews. While we discussed this review process with these officials, we did not visit states to observe OCSE conducting certification reviews or conduct independent work to verify the information presented in OCSE's certification reports.

We performed our work at HHS headquarters in Washington, D.C., and at the HHS regional office in Atlanta, Georgia. We conducted our work between December 1997 and April 1998, in accordance with generally accepted government auditing standards.

HHS provided written comments on a draft of this report. These comments are highlighted in the "Agency Comments" section of this report and are reprinted in appendix IV.

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<sup>8</sup>GAO/AIMD-97-72, June 1997.

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## OCSE Certification Guidance Addresses Law and Implementing Regulations

OCSE's guidance for certification reviews generally complies with the system provisions in the Family Support Act of 1988 and the implementing regulations established by the Secretary of HHS. This guidance includes: (1) the certification guide, which defines systems functional requirements and (2) the certification questionnaire, which in essence, is the certification guide presented in a questionnaire format.

Our analysis showed that the certification guide and questionnaire address key system elements of the law and implementing regulations. OCSE included references to system and program regulations in both the certification guide and questionnaire. We analyzed those references to determine whether the certification guidance addressed the regulations cited. The comparison in appendix III shows that each of the implementing regulations is addressed in OCSE's certification objectives. For example, section 307.10(b)(1) of the regulation requires that child support enforcement systems maintain identifying information on individuals involved in child support cases. Seven different certification objectives in the certification guidance address this requirement. Two of those certification objectives, A-8 and D-4, demonstrate how the guide addresses this requirement; respectively, they state that, "the system must accept and maintain identifying information on all case participants," and "the system must update and maintain in the automated case record, all information, facts, events, and transactions necessary to describe a case and all actions taken in a case."

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## Consistent Administration of Certification Reviews

OCSE has been consistent in the way it administers certification reviews. Specifically, it used the same types of teams, the same guidance that was discussed earlier, and the same method for certification reviews. Although the scope and length of functional, level 1, and level 2 certification reviews varied, OCSE has been generally consistent in the way that it conducted each type of review.

OCSE's review process is as follows. It begins preparing for a certification review when the state notifies it that the state system is compliant and ready for certification. When OCSE receives the request, it requires the state to submit consistent documentation, which includes the completed certification questionnaire. After OCSE receives the documentation, it assigns a team to review the information and develop issues for discussion during the certification review. These teams consistently included at least one supervisor and two systems analysts. In some cases, regional analysts also participated in the documentation review.

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Following that review, certification teams are formed from staff who have similar background and expertise. For example, the certification team leaders are usually systems analysts from OCSE headquarters. These leaders are assisted by teams from the Administration for Children and Families regional offices responsible for the states being reviewed. The regional teams are usually a combination of staff with systems, policy, or audit expertise.

In performing the certification reviews, these teams consistently use the certification questionnaire. OCSE used the same certification questionnaire for all of its level 1 and level 2 certification reviews except one. The first level 1 review was conducted before OCSE developed the certification questionnaire.

OCSE analysts have also used a consistent method for conducting certification reviews. Certification review teams spend approximately 1 week on-site conducting certification reviews. (Because functional reviews and level 1 reviews are more limited in scope, those reviews do not always take a full week.) During the certification review, the review team usually holds an entrance conference at the state office and allows the state staff to provide an overview of the child support enforcement system. The next few days are spent reviewing the state's responses to the certification questionnaire and observing how adequately system screens and functions address the federal requirements. This review at the state office is often performed using a test version of the system—one that does not include actual cases. To supplement the information obtained at the state office, the certification team usually spends at least one day visiting local offices to observe the system in operation. At the local offices, the team interviews staff about their use of the system and the systems training they have received. In addition, they have the staff process sample cases to ensure that the system will handle them correctly, observe the staff processing actual cases, and review reports and documents generated by the system.

OCSE uses the certification guide and questionnaire in lieu of a manual to instruct its staff on how to conduct certification reviews and relies heavily upon on-the-job training to ensure that the reviews continue to be conducted consistently. In one instance when a new certification staff member was added, that person was paired with experienced staff for the first two or three reviews after joining the review team, to gain experience and learn how to consistently cover the issues addressed by the certification teams.



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## Inconsistent Reporting on Certification Reviews

OCSE began reporting on the results of its certification reviews in 1994. In general, the format and process for preparing certification reports has been standardized. However, we noted that several reports contained inconsistencies, such as including inaccurate descriptions of the criteria against which the systems' financial components were measured.

OCSE's analysts used a standard template for preparing certification reports. As a result, we found the certification reports to be very similar in format and content. Even though the scope of the different reviews varied, the reports for functional, level 1, and level 2 reviews addressed similar topics. For example, they typically included a background section giving the history of the development of and funding for the system and describing the scope and methodology of the certification review. The reports also presented both certification findings and management findings. Certification findings are those system problems that must be addressed prior to system certification. Management findings are optional systems changes for management to consider. These findings often relate to the efficiency of the states' systems.

OCSE used a consistent process for reviewing the draft certification reports. According to an OCSE supervisor, division management reviewed all certification reports for consistency prior to their issuance. In addition, the office requested comments from states before publishing the final reports. According to OCSE officials, the nature, extent, and timeliness of the states' comments varied and, when appropriate, states' comments were incorporated into the final certification reports.

While OCSE published many standardized certification reports on the results of its certification reviews, we noted three types of exceptions with the reporting process. First, OCSE certified two state systems in July and December 1997, respectively, by sending a brief letter to each state instead of issuing a complete standardized written report. The division director explained that standardized reports were not prepared for those systems because the certification team found no problems with them during the review. Second, according to officials, a report was not published for one state's level 1 review because the level 2 review was requested before the earlier report was published.

Finally, the reports for one level 1 and five functional reviews contained a qualifying statement not contained in the boilerplate language of the standardized reports. This qualifying statement said that, in order to even be conditionally certified, a system must process the financial component

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of all sample cases correctly, in accordance with predetermined results. In contrast, the other standardized reports' paragraph on this subject did not contain this qualification.

The division director told us that the boilerplate language in the standardized reports was appropriate and that the qualifying language in the six reports was incorrect. She said OCSE will conditionally certify a system even though it does not process all sample cases correctly, as long as the majority of the financial transactions are processed accurately and the state has reasonable explanations for any variances. She added that none of the systems was denied level 2 certification based on the qualifying statement, and that she was unaware of any other systems that were denied certification for failing to process all test cases correctly.<sup>9</sup> The division director also noted that the problem was not widespread because only one lead analyst was responsible for the incorrect language. However, the review process did not prevent the incorrect language from being incorporated into the six published reports. Finally, she said that, until we brought this issue to her attention, she was not aware that any reports included this language; and that she would act to ensure that such qualifying language did not appear in future reports.

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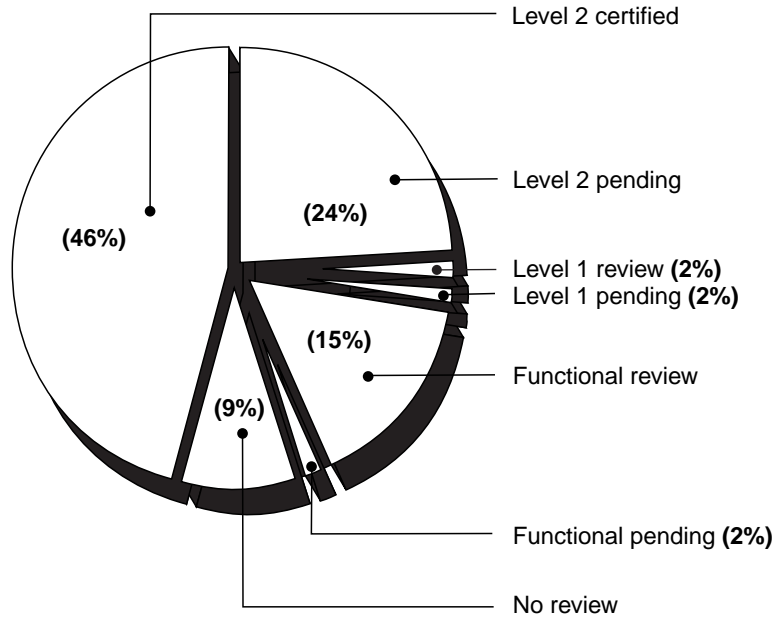
## Current Status: Many Systems Not Certified, More Reviews Scheduled

As of March 31, 1998, OCSE had either certified or conditionally certified 25 of 54 child support enforcement systems, representing approximately 38 percent of the reported average national caseload for fiscal year 1995. OCSE had conducted 67 certification reviews for the 54 state systems as of March 31, 1998. Some states have had several levels of review. Figure 1 shows the highest level of certification for the 54 child support enforcement systems as of March 31, 1998.

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<sup>9</sup>We did not verify whether any states were denied certification based on the results of their sample test cases, nor did we assess the sample case test process to determine if all cases should, or should not, be processed as a condition of certification.

Figure 1: Certification Status of 54 State Systems as of March 31, 1998<sup>a</sup>



<sup>a</sup>Level 2 certified state systems include 7 systems that were fully certified and 18 systems that were conditionally certified as of March 31, 1998.

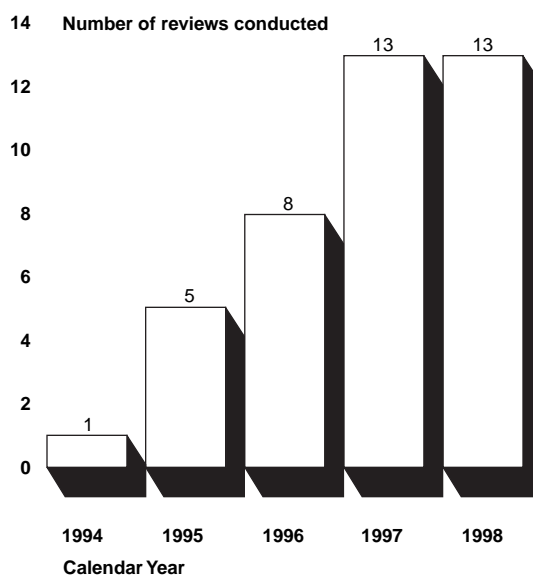
Source: HHS.

On page 10, as figure 2 indicates, 25 state systems were level 2 certified as of March 31, 1998. Figure 2 shows the status of level 2 certification for each state.



Since the October 1997 deadline, OCSE's certification review workload has increased substantially, as shown by figure 3. OCSE conducted 13 level 2 certification reviews for the first quarter of calendar year 1998,<sup>10</sup> equaling the number of level 2 reviews conducted in 1997—the most done in any previous year.

**Figure 3: Level 2 Certification Reviews Conducted, June 1, 1994 - March 31, 1998<sup>a</sup>**



<sup>a</sup>This graph reflects all level 2 reviews conducted, including reviews for the 25 certified systems. The 1998 reviews were conducted during the first 3 months of the calendar year.

Source: HHS.

The OCSE systems director told us, however, that the increased workload did not affect the staffing or quality of the certification reviews. She explained that (1) her staff traveled extensively, used newly acquired laptop computers, and worked long hours to manage the increased workload and (2) additional OCSE staff supported the system certification staff by relieving them of administrative duties. The systems director said that management chose to maintain its experienced review teams rather than add additional staff to conduct certification reviews. She said she prohibited the certification staff from taking vacations to ensure that the scheduled work was expeditiously completed. OCSE is currently

<sup>10</sup>The first quarter of calendar year 1998 is the second quarter of OCSE's fiscal year 1998.

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documenting the results of and preparing certification reports for the certification reviews performed in 1998. The systems director said she expects the rate of certification reviews to decline sharply because, as of March 31, 1998, only one request for a certification review was pending.

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## Conclusions

OCSE's certification guidance addresses the system requirements of the Family Support Act of 1988 and HHS' implementing regulations, and OCSE has administered the certification process consistently across states. Further, while OCSE, in general, used a standardized format and process in preparing certification reports on the results of its reviews, these reports were not always consistent.

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## Recommendation

We recommend that the Assistant Secretary of the Administration for Children and Families increase OCSE's oversight of the reporting process to ensure that the reports consistently address criteria for evaluating the financial components of state systems.

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## Agency Comments

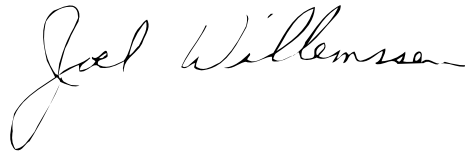
The Assistant Secretary for Children and Families agreed with our recommendation to increase OCSE's oversight of the reporting process. She stated that OCSE would increase its oversight and consistency of reporting by subjecting the functional and level 1 reports to the same degree of management review being provided to the level 2 reports.

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We will provide copies of this report to the Assistant Secretary, Administration for Children and Families, Department of Health and Human Services; the Director of the Office of Management and Budget; and appropriate congressional committees. We will also make copies available to others upon request.

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Please contact me at (202) 512-6253 or by e-mail at *willemsenj.aimd@gao.gov* if you have any questions concerning this report. Major contributors are listed in appendix V.

A handwritten signature in black ink that reads "Joel Willemsen". The signature is written in a cursive style with a large, looping initial "J".

Joel C. Willemsen  
Director, Civil Agencies Information Systems

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**Abbreviations**

AFDC	Aid to Families With Dependent Children
APD	advance planning document
C.F.R.	Code of Federal Regulations
GAO	General Accounting Office
HHS	Department of Health and Human Services
OCSE	Office of Child Support Enforcement
TANF	Temporary Assistance for Needy Families

# Child Support Enforcement Systems Regulations

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## 45 C.F.R. 307.10: Functional Requirements for Computerized Support Enforcement Systems

At a minimum, each state's computerized support enforcement system established under the title IV-D state plan at § 302.85 of this chapter must:

- (a) Be planned, designed, developed, installed, or enhanced in accordance with an initial and annually updated APD [advance planning document] approved under § 307.15; and
- (b) Control, account for, and monitor all the factors in the support collection and paternity determination processes under the state plan. At a minimum this must include:

- (1) Maintaining identifying information such as Social Security numbers, names, dates of birth, home addresses, and mailing addresses (including postal zip codes) on individuals against whom support obligations are sought to be established or enforced and on individuals to whom support obligations are owed, and other data as required by the Office;
- (2) Periodically verifying the information on individuals referred to in paragraph (b)(1) of this section with federal, state, and local agencies, both intrastate and interstate;
- (3) Maintaining data necessary to meet federal reporting requirements on a timely basis as prescribed by the Office;
- (4) Maintaining information pertaining to
  - (i) Delinquency and enforcement activities;
  - (ii) Intrastate, interstate and federal location of absent parents;
  - (iii) The establishment of paternity; and
  - (iv) The establishment of support obligations;
- (5) Collecting and distributing both intrastate and interstate support payments;
- (6) Computing and distributing incentive payments to political subdivisions which share in the cost of funding the program and to other political subdivisions based on efficiency and effectiveness if the state has chosen to pay such incentives;
- (7) Maintaining accounts receivable on all amounts owed, collected, and distributed;
- (8) Maintaining costs of all services rendered, either directly or by interfacing with state financial management and expenditure information;
- (9) Accepting electronic case referrals and update information from the state's title IV-A program and using that information

to identify and manage support enforcement cases;

(10) Transmitting information electronically to provide data to the state's AFDC [Aid to Families With Dependent Children; now Temporary Assistance for Needy Families (TANF)] system so that the IV-A agency can determine (and report back to the IV-D system) whether a collection of support causes a change in eligibility for, or the amount of aid under, the AFDC program;

(11) Providing security to prevent unauthorized access to, or use of, the data in the system;

(12) Providing management information on all IV-D cases under the state plan from initial referral or application through collection and enforcement;

(13) Providing electronic data exchange with the state Medicaid system to provide for case referral and the transfer of the medical support information specified in 45 C.F.R. 303.30 and 303.31;

(14) Providing electronic data exchange with the state IV-F program for purposes of assuring that services are furnished in an integrated manner unless the requirement is otherwise met through the exchange conducted under paragraph (b)(9) of this section;

(15) Using automated processes to assist the state in meeting state plan requirements under part 302 of this chapter and Standards for program operations under part 303 of this chapter, including but not limited to:

- (i) The automated maintenance and monitoring of accurate records of support payments;
- (ii) Providing automated maintenance of case records for purposes of the management and tracking requirements in § 303.2 of this chapter;
- (iii) Providing title IV-D case workers with on-line access to automated sources of absent parent employer and wage information maintained by the state when available, by establishing an electronic link or by obtaining an extract of the data base and placing it on-line for access throughout the state;
- (iv) Providing locate capability by automatically referring cases electronically to locate sources within the state (such as state motor vehicle department, state department of revenue, and other state agencies), and to the Federal Parent Locator Service and utilizing electronic linkages

to receive return locate information and place the information on-line to title IV-D case workers throughout the state;

(v) Providing capability for electronic funds transfer for purposes of income withholding and interstate collections;

(vi) Integrating all processing of interstate cases with the computerized support enforcement system, including the central registry; and

(16) Providing automated processes to enable the Office to monitor state operations and assess program performance through the audit conducted under section 452(a) of the Act.

# Child Support Enforcement System Requirements Provided in OCSE Certification Guide<sup>a</sup> and Questionnaire

## (A) Case Initiation

A-1	The system must accept, maintain, and process information for non-AFDC services.
A-2	The system must automatically accept and process referrals from the State's Title IV-A (AFDC) agency.
A-3	The system must accept and process referrals from the State's Title IV-E (Foster Care) agency.
A-4	The system must automatically accept appropriate referrals from the State's Title XIX (Medicaid) agency.
A-5	The system must automatically accept and process interstate referrals.
A-6	The system must uniquely identify and edit various case types.
A-7	The system must establish an automated case record for each application/referral.
A-8	The system must accept and maintain identifying information on all case participants.

## (B) Locate

B-1	The system must electronically interface with all appropriate sources to obtain and verify locate, asset and other information on the non-custodial/putative parent or custodial parent. The system must automatically generate any needed documents.
B-2	The system must record, maintain, and track locate activities to ensure compliance with program standards.
B-3	The system must automatically resubmit cases to locate sources.
B-4	The system must automatically submit cases to the Federal Parent Locator Service (FPLS).

## (C) Establishment

C-1	The system must automatically track, monitor, and report on the status of paternity establishment and support Federal regulations and State laws and procedures for establishing paternity.
C-2	The system must automatically record, track, and monitor information on obligations, and generate documents to establish support including medical support.
C-3	The system must accept, maintain, and process information concerning established support orders.
C-4	The system must accept, maintain, and process information concerning medical support services.

## (D) Case Management

D-1	If the State chooses to have case prioritization procedures, the system must automatically support them.
D-2	The system must automatically direct cases to the appropriate case activity.
D-3	The system must automatically accept and process case updates and provide information to other programs on a timely basis.
D-4	The system must update and maintain in the automated case record all information, facts, events, and transactions necessary to describe a case and all actions taken in a case.
D-5	The system must perform routine case functions, keep the caseworker informed of significant case events, monitor case activity, provide case status information, and ensure timely case action.
D-6	The system must automatically support the review and adjustment of support obligations.
D-7	The system must allow for case closure.
D-8	The system must provide for management of all interstate cases.
D-9	The system must manage Responding-State case actions.
D-10	The system must manage initiating-State case actions.

## (E) Enforcement

E-1	The system must automatically monitor compliance with support orders and initiate enforcement actions.
E-2	The system must support income withholding activities.

(continued)

**Appendix II  
Child Support Enforcement System  
Requirements Provided in OCSE  
Certification Guide<sup>a</sup> and Questionnaire**

E-3	The system automatically must support Federal tax refund offset.
E-4	The system must automatically support State tax refund offset.
E-5	The system must automatically identify, initiate, and monitor enforcement actions using liens and bonds.
E-6	Where action is appropriate under State guidelines, the system must support Unemployment Compensation Intercept (UCI).
E-7	The system must be capable of forwarding arrearage information to credit reporting agencies.
E-8	The system must support enforcement through Internal Revenue Service full collection services when previous enforcement attempts have failed.
E-9	In cases where previous enforcement attempts have failed, the system must periodically re-initiate enforcement actions.
E-10	The system must support the enforcement of spousal support.
E-11	The system must automatically monitor compliance with and support the enforcement of medical insurance provisions contained within support orders.

**(F) Financial Management**

F-1	With the exception of those cases with income withholding in force, the system must automatically bill cases with obligations.
F-2	The system must automatically process all payments received.
F-3	The system must support the acceptance and disbursement of payments using electronic funds transfer (EFT) technology.
F-4	The system's accounting process must be uniform statewide, accept and maintain all financial information, and perform all calculations relevant to the IV-D program.
F-5	The system must distribute collections in accordance with 45 C.F.R. 302.32, 302.51, 302.52, 303.72, and 303.102.
F-6	The system must generate notices to AFDC and former AFDC recipients, continuing to receive IV-D services, about the amount of support collections; and must notify the IV-A agency about collections for AFDC recipients.

**(G) Reporting**

G-1	The system must maintain information required to prepare Federal reports.
G-2	The system must provide an automated daily on-line report/worklist to each caseworker to assist in case management and processing.
G-3	The system must generate reports required to ensure and maintain the accuracy of data and to summarize accounting activities.
G-4	The system must provide management reports for monitoring and evaluating both employee, office/unit, and program performance.
G-5	The system must support the expeditious review and analysis of all data that is maintained, generated, and reported by the system.

**(H) Security and Privacy**

H-1	The State must have policies and procedures to evaluate the system for risk on a periodic basis.
H-2	The system must be protected against unauthorized access to computer resources and data in order to reduce erroneous or fraudulent activities.
H-3	The State must have procedures in place for the retrieval, maintenance, and control of the application software.
H-4	The State must have procedures in place for the retrieval, maintenance, and control of program data.
H-5	The system hardware, software, documentation, and communications must be protected and back-ups must be available.

(Table notes on next page)

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**Appendix II**  
**Child Support Enforcement System**  
**Requirements Provided in OCSE**  
**Certification Guide<sup>a</sup> and Questionnaire**

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Source: OCSE's Automated Systems For Child Support Enforcement: A Guide for States.

<sup>a</sup>The certification guide is currently being revised to incorporate changes required by welfare reform. The new version will refer to Temporary Assistance for Needy Families, the program that replaced Aid to Families With Dependent Children.

# Comparison of Regulations to OCSE's Certification Objectives for Child Support Enforcement Systems

Sections 1-16 of system regulations [45 C.F.R.]	Child Support Systems Certification Objectives (A-H)																							
	A-1	A-2	A-3	A-4	A-5	A-6	A-7	A-8	B-1	B-2	B-3	B-4	C-1	C-2	C-3	C-4	D-1	D-2	D-3	D-4	D-5	D-6	D-7	
307.10(b)(1)						■	■	■												■	■			■
307.10(b)(2)									■			■								■		■		
307.10(b)(3)																					■			
307.10(b)(4)							■									■	■				■			■
307.10(b)(5)																								
307.10(b)(6)																								
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307.10(b)(9)		■							■													■		
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307.10(b)(13)				■					■						■		■			■		■		
307.10(b)(14)																								
307.10(b)(15)	■	■	■	■	■		■		■	■	■	■	■	■	■	■		■	■		■	■	■	■
307.10(b)(16)																								





# Comments From the Department of Health and Human Services



DEPARTMENT OF HEALTH & HUMAN SERVICES

**ADMINISTRATION FOR CHILDREN AND FAMILIES**

Office of the Assistant Secretary, Suite 600  
370 L'Enfant Promenade, S.W.  
Washington, D.C. 20447

May 15, 1998

Mr. Gene L. Dodaro  
Assistant Comptroller General  
United States General Accounting Office  
Washington, D.C. 20548

Dear Mr. Dodaro:

Enclosed are the Administration for Children and Families comments on the draft report, Child Support Enforcement: Certification Process for State Information Systems (GAO/AIMD-98-134). Thank you for the opportunity to review and comment on this report prior to its release.

If you have any questions on the enclosed comments, please contact Robin Rushton of my staff at (202) 690-1244.

Sincerely,

Handwritten signature of Olivia A. Golden in cursive script.

Olivia A. Golden  
Assistant Secretary  
for Children and Families

Enclosure

**Appendix IV  
Comments From the Department of Health  
and Human Services**

COMMENTS FROM THE ADMINISTRATION FOR CHILDREN AND FAMILIES  
ON THE U.S. GENERAL ACCOUNTING OFFICE DRAFT REPORT, **CHILD  
SUPPORT ENFORCEMENT: CERTIFICATION PROCESS FOR STATE  
INFORMATION SYSTEMS.** (GAO/AIMD-98-134)

Thank you for the opportunity to comment on your report evaluating our efforts to certify States' child support enforcement automated systems as meeting the requirements of the Family Support Act of 1988. I'm pleased that your report confirmed that:

- o Our efforts to ensure that our certification process is consistent and fair to all States have been successful;
- o The certification requirements are well grounded in statute and regulation; and,
- o ACF staff have worked long and hard to bring this about.

I want to assure you that the Administration for Children and Families and the Federal Office of Child Support Enforcement (OCSE) are committed to maintaining consistency in how we conduct reviews and reporting on our findings as we work with those States which have not yet been certified as having met Family Support Act requirements. There will be no relaxation of our certification requirements for these States. To address the GAO recommendation that OCSE increase the oversight of the reporting process to ensure that the reports consistently address criteria for evaluating the financial components of States' systems, OCSE will subject Functional and Level I reports to the same management review for consistency that Level II system certification reviews have been undergoing. In addition, OCSE will develop new review report templates in Word 6.0 for follow-up Family Support Act reviews, letters/reports related to removing conditions and technical assistance and Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) reviews.

We plan to apply much the same process and procedures to our certification of States as meeting the additional certification requirements mandated by PRWORA. We do, however, plan to begin on-site reviews earlier than we were able to do in the past. We are also considering more frequent, limited-scope reviews focusing on particular modules as they are developed by States. These enhancements will improve our oversight of States' systems development process and provide useful, timely feedback to States as they implement systems.

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**Appendix IV  
Comments From the Department of Health  
and Human Services**

We look forward to continuing to work with you and your staff as States implement the automated systems that are so crucial to our efforts to ensure that America's children receive the support they deserve.

# Major Contributors to This Report

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# Related GAO Products

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Child Support Enforcement: Privatization: Challenges in Ensuring Accountability for Program Results ([GAO/T-HEHS-98-22](#), Nov. 4, 1997).

Child Support Enforcement: Leadership Essential to Implementing Effective Automated Systems ([GAO/T-AIMD-97-162](#), Sept. 10, 1997).

Child Support Enforcement: Strong Leadership Required to Maximize Benefits of Automated Systems ([GAO/AIMD-97-72](#), June 30, 1997).

Child Support Enforcement: Early Results on Comparability of Privatized and Public Offices ([GAO/HEHS-97-4](#), Dec. 16, 1996).

Child Support Enforcement: Reorienting Management Toward Achieving Better Program Results ([GAO/HEHS/GGD-97-14](#), Oct. 25, 1996).

Child Support Enforcement: States' Experience with Private Agencies' Collection of Support Payments ([GAO/HEHS-97-11](#), Oct. 23, 1996).

Child Support Enforcement: States and Localities Move to Privatized Services ([GAO/HEHS-96-43FS](#), Nov. 20, 1995).

Child Support Enforcement: Opportunity to Reduce Federal and State Costs ([GAO/T-HEHS-95-181](#), June 13, 1995).

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