

APPENDIX D

CONDITIONAL CERTIFICATION

OCSE Action Transmittal 90-11 specifies the circumstances in which a State may be granted a conditional certification.

L(3) Conditional certification. States may be granted a conditional certification at either level if the system meets all functional requirements but does not include a Federally mandated change that occurred late in the systems development life cycle, or if OCSE finds discrepancies which are minor in nature and easily correctable.

After soliciting input from States, OCSE has determined that the following certification objectives are eligible for conditional certification under the criteria of "late in the development life cycle" because Federal data specifications either have not yet been finalized or were finalized but issued late in the development cycle.

We also remind the States that a conditional certification does not mean that the functional requirement has been eliminated, it merely means that OCSE has agreed to grant additional time to States to program functional specifications that are evolving or only recently finalized.

OCSE after soliciting comments and suggestions from the National Council on Child Support Directors as well as individual State suggestions, has agreed to grant more time, past the October 1, 2000 statutory deadline for the following functional requirements:

AEI

Objective E-12

The timeframe for this requirement will not be set until after the current AEI pilot and recommended data specifications for AEI are published in final. After the functional certification requirements are published and disseminated to States, the States will have at least 6 months to program for this functional requirement.

7 digit FIPS Code updates

Objective D-7(e)

The timeframe for this requirement will not be set until OCSE meets with States to determine the value of the 6th and 7th FIPS code digits and if Federal standards are needed. If the Federal/State workgroup recommends that the FIPS digits are necessary, the States will have at least 6 months after the data specification are published to program for this functional requirement.

State Disbursement Unit

Objective F-2

Additional time to address the State Disbursement Unit (SDU) functional requirement is only permitted if the State has met all other requirements for a full or conditional PRWORA certification except the SDU, *and* the State has requested and is currently subject to the alternative penalty for the SDU. In this situation, OCSE would permit a conditional PRWORA certification without meeting the SDU functional requirements.

Objectives F-1 and F-3

In addition, if the State demonstrates that EFT/EDI capability and/or billing is planned as an integral part of the SDU and the State has met all other requirements for a full or conditional PRWORA certification except SDU, and is subject to the alternative SDU penalty, the requirements in Objectives F-1 and F-3 may be eligible for a condition as well.

The additional amount of time to complete such functional requirement(s) will vary from State to State based on when the State is compliant with their SDU. We remind States that the alternative SDU penalty increases each year of non-compliance.

CSENet

Objective A-5, D-7, D-8 and D-9

Since the OCSE and the States concur that a re-evaluation of the CSENet applications and process is needed to ensure that this interstate network best meets the recent revisions in interstate processes, we agree to permit a condition for CSENet certification functionality through a phased development.

Phase I - To initially qualify for a conditional certification for CSENet functionality, States must implement the frame relay communication, and demonstrate the ability to send and receive the Quick Locate (LO1) and Case Information Transaction (CSI) by October 1, 2000. In addition, States must agree as part of phase I certification to abide by the consensus plan for phased implementation for the remaining interstate functionality.

Phase II - OCSE will commit considerable resources over the next six months to work in partnership with a group of State representatives (one from each Region) appointed by the National Council of Child Support Directors on the remaining functions (PAT, EST, ENF and MSC) of the CSENet application. The intent will be to develop consensus on Phase II CSENet implementation, including: timeframes for implementation of specific functional areas, simplification of functional requirements, and recommendations for tasks/processes that may be better handled by the server. Between now and December the group will determine the sequence of implementation for Phase II (e.g., which functions to implement next). In addition, the group will examine the possibility of simplifying the data transmission requirements. For example, an OCSE server may handle certain processes better. The consensus plan will be issued in December, 2000.

Based upon the decisions of the group, any changes in data specifications will follow shortly thereafter. If changes are proposed every effort will be made to minimize the impact on States that have already programmed for CSENet.

States will then have until October 1, 2001 to fully implement the remaining interstate functionality in accordance with the revisions.

Phase III – States have identified the need for CSENet to support the enhanced business processes that have emerged during the past few years as a result of new legislation and automated systems development. The CSENet Collection function is likely to be substantially expanded by proposals from the Interstate Reform Initiative. Therefore, the phased development and implementation of new business processes and the CSENet Collection function will not be required until at least 6 months after the data specifications are published.

Automated Wage Withholding

Because of confusion over whether the certification requirement applied to just new hire information, intra-state new hire information or information from any source (i.e. Quarterly Wage and UI), OCSE has agreed to allow States more time to address the automation of wage withholding under certification objective E-2 (d). We agree to permit a conditional certification for Objective E-2 (d) and allow States until April 2001 to automate wage withholdings. We have also provided more clarification on what is an

acceptable level of automation for automated wage withholdings. See Appendix E for questions and answers related to automated income withholding.