California Department of Child Support Services

CCSAS Third Party Access Process

January 11, 2008

January 25, 2008 (Version 1.1)

Technology Services Division -

REVISION HISTORY

REVISION	DATE OF RELEASE	PURPOSE
Version 1.0	01/11/2008	Initial Baseline
Version 1.1	01/25/2008	Update Pages 4, 5, 8, 9, 10, 12

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1. INTRODUCTION

State and Federal law allow disclosure of child support information to third party organizations for purposes of administration of California's Child Support Program, Welfare Program and Foster Care Program. Providing legally authorized third party users direct access to CSE for legally authorized purposes facilitates efficiency to Child Support Program staff as well as the third party organizations' staff.

DCSS is responsible for the security and confidentially of child support information maintained on CSE. DCSS must ensure that confidential child support information is disclosed to third parties only as permitted by law. DCSS must also maintain high level of system performance for CSE to ensure that Child Support Program users as well as third party users can perform their responsibilities efficiently. DCSS must balance the needs of third party users with the need to maintain a high level of system performance.

This Process describes the steps required to establish third party access. The Process also describes the information that DCSS will consider in granting access and establishing the number of users for each third party organization.

1.1 Goal of Process

The goal of the Process is to identify and document approved access by third party organizations for authorized purposes while protecting confidential information and ensuring availability of CSE for all authorized users.

1.2 Review Cycle for Process

This Process will be reviewed annually by the Process Owner for effectiveness and will be updated if necessary.

1.3 Process Communication

- This Process is published on the DCSS Public Website using the following path. Click on the Child Support Professionals tab. Then select the Third Party Access Process link.

- The Process Owner provides a process kickoff meeting to include all DCSS staff with Process roles approximately 1 week before the Process is published online. The kickoff meeting was held on January 18, 2008. The process team will meet once a month or as needed.

- The Process Owner provides a Process walk through to all IV-D Directors at either a CSDA Membership Meeting or at a CCSAS Bi-Monthly Meeting. The walk through was presented at a CSDA Membership Meeting on January 24, 2008.

1.4 Plan Organization

This Process is comprised of a narrative description of the process steps followed by Appendices containing Process tools.

1.5 Roles and Responsibilities

The following table describes roles and responsibilities for the Process.

Roles*	Responsibility	Organization
Process Owner	- Implements and oversees this Process - Assigns the Process Manager - Approves Requests for Third Party Access (Applications) - Determines number of users accounts to be authorized for each Requestor - Signs MOU on behalf of DCSS	DCSS
Process Manager	- Receives Applications and manages approval process - Maintains the process tracking spreadsheet (Spreadsheet) - Publishes approved user account matrix (Matrix) online	DCSS
LCSA Director	- Determines whether to invite a Requestor to submit an Application - Designates a Third Party Access Coordinator (Coordinator) for LCSA - Recommends number of users accounts that should be granted to Requestor	LCSA
Requestor	- Completes Application - Obtains signature for MOU - Implements procedures to ensure that users receive security awareness training and sign confidentiality statements before they obtain user accounts - Implements procedures to retain signed confidentiality statements for audit purpose	Third Party Organization
DCSS Legal	Provides advice regarding statutory authority for Requestor access to CSE for intended use	DCSS
Contract Manager	Retains signed MOUs and notifies Process Manager when renewal is needed	DCSS
LCSA Third Party Access Coordinator (Coordinator)	Acts as the contact person at the LCSA for all Third Party Access issues	LCSA
LCSA System Administrator (Administrator)	Assigns security role for each user and assigns role to each user account	LCSA
Infrastructure Manager	Creates office ID for Requestor Infrastructure Evaluation	CCSAS Systems Management
DCSS ISO	Audits Requestor's compliance with security requirements of MOU	DCSS

* All references to rolls throughout this Process are capitalized

1.6   User Account Allocation Guide

DCSS will not have complete information about how many Child Support Program users will need access to CSE until CSE implementation is complete. DCSS has limited information available to predict the number of user accounts that will be requested by third party users. DCSS's goal is to balance the benefit of granting third party user accounts against the risk of system performance degradation. DCSS wants to provide access to those third party users that had access to a consortia system before conversion to the extent possible. DCSS has developed a User Account Allocation Guide (UAAG) to achieve these goals.

DCSS considered the number of user accounts made available to each organization in the consortia systems and reserved a small number of user accounts for other third party users in each county for allocation based on justifications provided by Requestors and LCSA Directors. The table below is only a guideline. The Process Owner will consider all justifications provided in each Application and recommendations from LCSA Directors in granting user accounts. In addition, after completion of CSE conversion to all counties, the Process Owner will review the overall allocation of user accounts to determine if additional user accounts can be allocated.

County	User Organization	# of Pre conversion Users	Reserved for initial User Allocation #
Alameda	IV-A	5	5
Amador			1
Butte	District Attorney for PC270 cases	2	0
Calaveras			1
Colusa			1
Contra Costa			1
Del Norte			1
El Dorado	IV-A	2	2
Fresno			1
Glenn			1
Humboldt			1
Imperial			1
Eastern Sierra			1
Kern			1
Kings			1
Lake			1
Lassen	IV-A	1	1
Los Angeles	IV-A	22	22
	IV-E	150	150
Madera			1
Marin			1
Mariposa			1

County	User Organization	# of Pre conversion Users	Reserved for initial User Allocation #
Mendocino			1
Merced	IV-A	37	37
	Child Abduction	1	0
Siskiyou/Modoc			1
Mono			1
Monterey	IV-A	30	1
Napa			1
Sierra Nevada			1
Orange	IV-A	46	46
	DA	34	0
Placer			1
Plumas			1
Riverside			1
Sacramento	Child Abduction	2	0
	IV-A	71	71
Santa Cruz San Benito			1
San Bernardino			1
San Diego	IV-A	800	100
San Francisco			1
San Joaquin			1
San Luis Obispo	IV-A	5	5
San Mateo			1
Santa Barbara			1
Santa Clara	IV-A	49	49
Shasta	IV-A	4	4
Siskiyou			1
Solano			1
Sonoma	IV-A	5	5
Stanislaus	IV-A	10	10
Sutter			1
Tehama			1
Trinity			1
Tulare			1
Tuolumne			1
Ventura	IV-A	5	5
Yolo			1
Yuba			1

2. APPROVAL CRITERIA FOR GRANTING THIRD PARTY ACCESS

The following criteria must be satisfied before DCSS authorizes access to a Requestor.

1. LCSA Director identifies the Requestor as an organization that should be granted access and recommends the number of user user account to be granted.

2. Requestor must be authorized access to child support information for a purpose described in 42 USC 453A(f),(g) and (h); 45 CFR 302.35; 45 CFR 307.10, 307.11 and 307.13; and California Family Law section 17212.

3. Requestor must be able to connect to a DTS Point of Presence (POP) and provide all any other infrastructure necessary for connectivity to CSE within county of location.

4. Requestor and State must execute and comply with the provisions of the DCSS Memorandum of Understanding.

5. Requestor's identified users must complete security awareness training provided by DCSS, before obtaining an account and then annually.

6. Requestor's identified users must sign confidentiality statements before obtaining an account and then annually.

7. LCSA Director or designee directs LCSA System Administrators to set up Requestor's user accounts and provide necessary help desk services.

8. LCSA Director or designee provides technical assistance or training as needed to Requestor's users regarding CSE navigation for users' purpose.

3. IMPLEMENTATION TIMING

This Process is being implemented after several CSE conversion waves. Access will be granted to Requestors in counties with converted LCSAs first. LCSA Directors may Identify Requestors at any time after the Process is published. The Process Manager will send invitation letters to Requestors from converted counties first. The Process Manager will send invitation letters to Requestors in future conversion wave counties a minimum of two months after conversion. The reason for this is to ensure that LCSA staff can deal effectively with conversion issues prior to establishing and supporting Requestor user accounts.

4. TIMELINE FOR PROCESS ACTIONS

LCSA Directors may identify Requestors at any time. Requestors may apply at any time after receipt of the invitation letter. This process does not anticipate deadlines for either of these activities. Process actions to be performed by DCSS staff will be expedited to the extent feasible. The table below describes goals for DCSS staff performance of specific process steps. The table describes goals rather than deadlines. Once the Process is published and initial Invitation letters are sent, there may be a high volume of applications to process and the timelines may be

impossible to meet. DCSS staff may from time to time have to adjust the processing timelines to accommodate higher priority assignments.

TRIGGER	DCSS ACTION TO BE TAKEN	GOAL FOR COMPLETION AFTER TRIGGER	COMMENT
Receipt of LCSA Identification information or elapse of 2 months following CSE conversion, whichever occurs later	Send Invitation Letter to Requestor	Within 15 working days	
Receipt of Application from Requestor	Review Application for Legal Authority for Access for Purpose described in the Application	Within 15 working days	Action may be delayed if: purpose statement is unclear; CSE security role is inadequate for purpose or extensive legal research is necessary
Receipt of opinion from DCSS Legal that access to Requestor is legally authorized	Issue Conditional Approval of Application for Access, Send Training, Certification Statements and Final MOU to Requestor	Within 15 working days	Action may be delayed if number of users requested exceeds UAAG and justification for additional users must be approved
Receipt of MOU signed by Requestor	Obtain DCSS signature for MOU, Update Approved User Account matrix, Notify Infrastructure Management that Requestor is approved	Within 15 working days	
Receipt of Notice that Requestor is Approved	Establish Access	Within 30-45 working days	

This Process does not establish timeline goals for LCSA System Administrator Actions or CSE user training activities that LCSA may have to provide to third party users.

5. PROCESS TRACKING TOOLS

Process Manager develops and maintains:

1. The process tracking Spreadsheet to track the process steps.

2. The Matrix of authorized users that each Requestor is granted. The Matrix is available on the DCSS Public Website using the following path. Click on the Child Support Professionals tab. Then select the CSE Approved Users Matrix link. The matrix is available to interested persons from all organizations, DCSS, Requestor, LCSA.   Thus, the Process Owner, Process Manager, LCSA

Directors, Requestors, Coordinators, Administrators can check at any time to verify how many users are authorized for each organization.

6.   APPLICATION AND APPROVAL PROCEDURES

6.1   Process Owner Publishes Process to LCSA Directors

The Process Owner publishes the Process to LCSA Directors by CSS letter with link to the Process. The Process describes how LCSA Directors designate third party organizations for application for CSE access.

6.2   LCSA Directors Identify Requestors

LCSA staff provides security administration, CSE training and help desk services to any Requestor with access in their county. Each LCSA Director has discretion whether to authorize users from Requestors from the county and how many users to authorize. DCSS will send invitation letters only to Requestors identified by the LCSA Director for that county. The LCSA Director provides the following information to the Process Manager.

1. Name, title and address of individual at the organization to invite.

2. Name, title and contact information of the individual designated to perform the LCSA Third Party Access Coordinator responsibilities.

3. Name, title and contact information of the individual designated to perform the LCSA System Administrator responsibilities.

4. Number of users in identified third party organization that LCSA Director recommends access to CSE.

5. Date that invitation letter should be sent. (Must be a minimum of two months after CSE conversion for the LCSA.)

The above information may be sent to the Process Manager by mail, email or FAX at the following addresses.

CCSAS User Administrator
P.O. Box 419064
Mailstop 40
Rancho Cordova, California 95741-9064 or
Fax (916) 464-5335 or CCSASACCESS@DCSS.CA.GOV

6.3   Process Manager Sends Invitation Letters

Process Manager:

1. Updates the Spreadsheet

2. Schedules date to send invitation letter

3. Sends invitation letter to Requestor on scheduled date.

6.4   Requestor Completes Application

The Requestor completes the Application and sends it to the Process Manager according to the instructions in the invitation letter.

6.5   Process Manager Acts on Application

Upon receipt of the Application the Process Manager:

1. Obtains legal review of the application
2. Sends a request to the Infrastructure Manager to test the Requestor's ability to connect to DTS point of presence
3. Sends Application with Legal sign off and verification of connectivity to Process Owner for approval
4. Updates the Spreadsheet

6.6   Process Owner Approves Application

The Process Owner reviews the Application and prepares and signs either a:

1. Notice of Rejection and reason to the Requestor with a copy to the LCSA Director, or
2. Notice of Conditional Acceptance to the Requestor's Contact Person

6.7   Process Manager Sends Approval Package to Requestor

Process Manager sends:

1. The approval or rejection letter to Requestor
2. MOU, confidentiality statements and security awareness training modules to approved Requestors

6.8   Requestor Signs MOU and Implements Training and Certification Procedures

Requestor's Contact Person:

1. Obtains the Requestor's signature for the MOU and returns the original to the Process Manager
2. Identifies staff for CSE access
3. Implements security awareness training process for identified staff
4. Implements certification process
5. Retains certifications for audit purposes

6.9   Process Manager Posts Approval Status

Upon receipt of the Requestors signed MOU, the Process Manager:

1. Obtains the signature of the MOU by Process Owner

2. Updates the online Matrix

3. Notifies CCSAS Infrastructure Manager to create the organizational ID for the Requestor

4. Delivers the signed MOU to the MOU Manager and Requestor.

7. PROCEDURES TO ESTABLISH ACCESS

7.1 Create Office ID

The Infrastructure Manager creates the office ID for the Requestor and then notifies the Process Manager, Requestor's Contact Person, and the Administrator that the office ID has been created. The Process Manager updates the Spreadsheet with this information. The Requestor's Contact Person and the Administrator coordinate the set up of user accounts with the LCSA

7.2 Evaluate Infrastructure

The Infrastructure Manager will conduct an infrastructure evaluation of DTS, County, and Third Party entities. The evaluation will include defining the current environment proposal for recommendations, testing and implementation.

7.3 Set Up User Accounts

The Administrator follows the CCSAS End User ID Procedures, CDL TM 080 to set up third party user accounts choosing the appropriate security profile for the users.

8. SECURITY AUDIT

The DCSS ISO audits the Requestor for compliance with security awareness training and certification responsibilities and sends audit findings to the Process Owner and to the Requestor's Information Security Officer. Process Owner coordinates with Requestor's Information Security Officer coordinates to clear any negative audit findings.

9. DETERMINATION OF NEED FOR ADDITIONAL ACCESS

Following the conversion all LCSAs onto CSE, the Process Owner will survey all third party organizations that have been granted user user accounts for access to CSE. The purpose of the survey is to determine adequacy of the number of user accounts for each organization. If the survey indicates that additional user accounts are needed the Process Owner will investigate the feasibility of adding additional third party. If the Process Owner determines that additional user accounts can be made available to third party organizations, the Process Owner will update the UAAG and notify LCSA Directors of additional reserved user accounts. LCSA Directors may then pass on invitations to third party organization using the steps described above.

10.   MOU RENEWAL

10.1 Need for Renewal Notice to Process Manager

Six months before expiration of the term of each MOU, the DCSS Contract Manager notifies the Process Manager that the MOU is due for renewal. The Process Manager obtains information from DCSS ISO regarding any audit findings that have not been cleared by the organization. If there are no outstanding audit findings, the Contract Manager will notify the Process Owner that the organization is in good standing for renewal. If there are outstanding audit findings, the Process Manager notifies the Process Owner. The Process Owner notifies the Requestor that the MOU will not be renewed until all audit findings are cleared.

10.2 Invitation to Renew

The Process Owner initiates the renewal process using the same steps described in Section 6 above.

Appendix A INVITATION LETTER TEMPLATE

[Name and address of Requestor]

Dear **[name]:**

The Department of Child Support Services (DCSS) owns the Child Support Enforcement (CSE) system which maintains child support information. State and Federal law[1] authorize disclosure of child support information to individuals and organizations outside of the Child Support Program solely for the purpose of administration of the Child Support, Welfare and Foster Care programs. **[name of LCSA Director that identified the Requestor]** has identified your organization as one which either assists the Child Support Program or administers one of the other programs identified above. The Director has recommended that DCSS grant your organization [number of user accounts] with access to CSE. Below is a list of requirements that must be satisfied before access to CSE can be granted to users in your organization. Your organization must:

1. Be authorized by Federal and State law to access child support information for a purpose described therein.

2. Be able to connect to a Department of Technology Services Point of Presence and provide all infrastructures necessary for connectivity.

3. Execute a Memorandum of Understanding provided by DCSS.

4. Train your designated CSE users utilizing the security awareness training modules provided by DCSS.

5. Obtain signatures from your organization's CSE users on Confidentiality Statements provided by DCSS. A copy of the Confidentiality Statement is attached for your review.

An application for access to CSE and a sample Memorandum of Understanding is attached to this letter. If you would like to apply for access for your organization, please complete the Application and send it to:

>   [Process Manager Name]
>
>   P. O. Box 419064
>   Mailstop [ ]
>   Rancho Cordova, California 95741-9064 or
>   Fax (916) 464-[   ] or
>   [Process Manager Email]

If you have any questions or concerns regarding this letter, please contact me at (916) XXX-XXXX.

Very truly yours,

Process Manager

cc: LCSA Director

Attachments

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[1] 42 USC 453A(f),(g)and (h); 45 CFR 302.35; 45 CFR 307.10, 307.11 and 307.13; California Family Law 17212.

Appendix B THIRD PARTY ACCESS APPLICATION

CSE THIRD PARTY ACCESS APPLICATION

REQUESTOR INFORMATION	
Name of Requestor (organization filing this application):	
Contact person for request	Title:
Contact number:	Fax number #:
Email :	
Information Security Officer's name:	Title:
Phone Number:	Email address:
Name of person that will sign the MOU for Requestor	Title:
Describe statutory authority which allows disclosure of child support information to Requestor.	
For what purpose will requestor use child support information?	
Number of users requested.	
Signature of Requestor or Designee	
Date	

Appendix C CONDITIONAL ACCEPTANCE LETTER TEMPLATE

[Name and address of Requestor]

Dear [name]

I have reviewed your application for Child Support Enforcement access and have obtained authority to grant [number of user accounts] to your organization upon completion of the following actions:

1. Sign two originals of the Memorandum of Understanding which is enclosed and mail both originals to:

> [Process Manager name]
> Department of Child Support Services
> P. O. Box 419064
> Mailstop [ ]
> Rancho Cordova, California 95741-9064

Upon receipt of the signed Memorandum of Understanding original, I will obtain the signature on behalf of DCSS and return a signed original to you. I will notify the Infrastructure Manager to provide your organization with an organizational identification.

2. Train each of your identified users using the security awareness training module that is provided for you in the enclosed CD. This training must be completed by each user before obtaining a CSE account and annually thereafter.

3. Obtain each users' signature on the Confidentiality Statements provided with this letter. Users must sign these Confidentiality Statements before obtaining a CSE account and annually thereafter. You must retain these signed statements in a retrievable format and produce them upon DCSS request.

Once your users have completed security awareness training and signed the Confidentiality Statements, contact Access Coordinator.

> Local Child Support Agency
> Access Coordinator Name
> title
> Address
> Phone
> Email]

If you have any questions you may contact [Process Manager] at [phone number]. Thank you.

Sincerely,

Program Owner

Enclosures

cc: Director Local Child Support Agency

Appendix D SAMPLE APPROVED USER ACCOUNT MATRIX

COUNTY	USER ORGANIZATION	APPROVED USER ACCOUNTS	TERM
Alameda			
Central Sierra			
Amador			
Butte			
Calaveras			
Colusa			
Contra Costa			
Del Norte			
El Dorado			
Fresno			
Glenn			
Humboldt			
Imperial			
Eastern Sierra			
Kern			
Kings			
Lake			
Lassen			
Los Angeles			
Madera			
Marin			
Mariposa			
Mendocino			
Merced			
Siskiyou/Modoc			
Mono			
Monterey			
Mono			
Monterey			
Napa			
Sierra Nevada			
Orange			
Placer			
Plumas			
Riverside			
Sacramento			
Santa Cruz San Benito			
San Bernardino			
San Diego			

COUNTY	USER ORGANIZATION	APPROVED USER ACCOUNTS	TERM
San Francisco			
San Joaquin			
San Luis Obispo			
San Mateo			
Santa Barbara			
Santa Clara			
Shasta			
Siskiyou			
Solano			
Sonoma			
Sonoma			
Stanislaus			
Sutter			
Tehama			
Trinity			
Tulare			
Tuolumne			
Ventura			
Yolo			