

CALIFORNIA DEPARTMENT OF CHILD SUPPORT SERVICES

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



August 27, 2001

LCSA LETTER NO. 01-29

TO: ALL IV-D DIRECTORS

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

SUBJECT: STATUS OF FEDERAL DATA RELIABILITY AUDITS

This letter transmits information regarding the results of the federal data reliability audit for Federal Fiscal Year (FFY) 2000, potential changes in the way the State calculates the paternity establishment performance measure, and actions that have been initiated to improve data reliability.

Federal Data Reliability Audit Findings

The Department of Child Support Services (DCSS) recently received the results of the federal data reliability audit for FFY 2000. California was found out of compliance in the area of paternity establishment (specifically lines 5 and 6 on the OCSE 157). The findings cite variances where the mother is the non-custodial parent and the child was included on lines 5 and 6 of the OCSE 157. In the State's response to the audit, we stated that it may be advisable to improve the clarity of the federal instructions. The specific directions for the lines in question are to "report the number of children in the IV-D caseload open at the end of the fiscal year who were born out-of-wedlock." In our response, we pointed out that if the intention is to exclude children where paternity is not being pursued against the non-custodial parent (as in the case when the non-custodial parent is the mother), the directions for line 5 of the OCSE 157 should specify that exclusion.

As a result of the audit findings, it is critical that we focus on improving both our performance and data reliability in terms of paternity establishment. Beginning in FFY 2001, failing data reliability will result in a substantial penalty in addition to the loss of incentives. However, the State will have an opportunity to submit a corrective action



plan and if we pass the data reliability audit in FFY 2002, we will not incur the penalty. Otherwise, the penalty incurred in FFY 2001 will be assessed in FFY 2003.

We have been informed that Los Angeles County has initiated system changes to address the issue of establishing paternity for cases where the mother is the non-custodial parent. We need to ensure that all counties are also addressing this issue.

Paternity Establishment Measure

California has historically performed well on the statewide Paternity Establishment Performance (PEP) measure. However, because of federal concerns regarding data reliability, beginning in FFY 2000 we converted to the IV-D only measure. Because of the negative effect this change has had on California's PEP measure, DCSS is considering changing back to the statewide PEP measure if sufficient data cleanup activities have occurred to address the data reliability issues.

To ensure that all activities needed to achieve data reliability for the statewide PEP measure have been completed, we are asking the local child support agencies to take the following actions:

- The statewide PEP requires that children born in other states or where their birthplace is unknown be excluded from the calculation. Local child support agencies need to identify all children for whom paternity was established through the judicial process during FFY 2001, who were born in other states or where the place of birth is unknown, and report this number on line 16b of the CS 157. DCSS will identify and exclude those children born out of state for whom paternity was established by a declaration of paternity filed with the state. This will allow DCSS to exclude the children for whom paternity was established who were not born in California. According to the PRISM Advisory Group, system changes necessary for counties to accomplish their part of this process were previously funded and have already been made (per LCSA 00-03).
- It is critical that there not be duplicate counting of a child's paternity. This has previously happened when paternity was adjudicated and there is already a paternity declaration on file. To ensure this double counting will no longer occur, each county will receive a CD of paternity declarations established during the FFY 2001 around October 10th. The county must then compare the children for whom they established paternity through the judicial process during FFY 2001 against the children on the CD. Once all duplicates have been identified, that number must be reported on line 16c of the CS 157. We have solicited input from consortia leads on the number of CDs needed.

Actions to Improve Data Reliability

The DCSS is making data reliability a priority. Thus, we will continue our efforts of ensuring that both data maintained and reported by the State and the local child support agencies, is accurate and reliable. To that end, the following actions have been initiated:

- The Office of Research and Program Design was established and is responsible for maintaining data reliability.
- The firms of Policy Studies Inc., and Sjoberg Evashenk Consulting, LLC, have been commissioned to make recommendations for improving performance at both the statewide level and for selected counties. As part of that effort, the contractors are being asked to examine how data is reported.
- DCSS will examine the results of the data reliability audit for FFY 2000 to identify errors that indicate problems with programming in the consortia systems as well as other systematic errors.
- Information Technology are revamping our reporting process so that State staff will not have to key enter county data. The counties will download a flat file from their system which will be sent to DCSS. Data edits have been added to identify discrepancies.
- Information Technology staff has convened a workgroup (the Requirements Analysis Workgroup - RAW) to define system requirements. The group is examining each report to ensure that the consortia define data elements consistently and report accurately.
- The Regional Administrators will take a more active role in working with counties to improve performance and data reliability.

I believe that working together we can make great strides in improving California's data reliability. If you would like additional information, or if you have any questions or concerns regarding this matter, please contact Linda Patterson, Performance Evaluation and Analysis Manager, at (916) 464-5035.

Sincerely,

LEORA GERSHENZON
Assistant Director

Attachment