

California Child Support Enforcement System

Independent Verification & Validation Assessment Review Report February 1-2, 2000



**U.S. Department of Health and Human Services
Administration for Children and Families
Office of Child Support Enforcement**

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EXECUTIVE SUMMARY

As a result of missing the October 1, 1997, deadline for achieving statewide installation and operation of a comprehensive automated child support enforcement system as required under the requirements of the Family Support Act of 1988, the California Child Support Enforcement System (CSES) project became subject to mandatory provisions of 45 CFR 307.15(b)(10). These provisions require an entity independent of the State Title IV-D agency and of the CSES project management structure to review all technical and managerial aspects of the project. An Independent Verification and Validation (IV&V) assessment of the CSES was conducted by the Federal Office of Child Support Enforcement (OCSE) on February 1-2, 2000. The purpose of the assessment was to determine the scope of IV&V services required on the California CSES system project. This report presents the findings of our assessment review.

CALIFORNIA CSES PROJECT ORGANIZATION

The structure of California's CSES project is unique and therefore requires some explanation. The State has recently introduced new legislation to form a new agency, the Department of Child Support Services (DCSS), to be responsible for operating the State's child support enforcement program. Under DCSS, the California Franchise Tax Board (FTB) is responsible for developing, implementing and maintaining a new single statewide system, the California Child Support Automation System (CCSAS). While this system is being developed, the State's Health and Human Services Agency Data Center (HHSDC), also under the direction of DCSS, is responsible for the administration of the Pre-Statewide Interim Systems Management (PRISM) project that counties will operate under until the new single statewide system is in place. In addition to the above projects, the Federal Office of Child Support has recently conditionally approved FFP for the State to develop an enhanced arrearage collection system, the "California Arrearage Management Project (CAMP)." The FTB will be responsible for the development of the CAMP system.

IV&V ASSESSMENT REVIEW - FINDINGS AND RECOMMENDATIONS

The State must immediately acquire IV&V services for California CSES planning and development. These services must be provided at an organizational level that is independent of and will ensure oversight to all California Child Support Automation. California Child Support Automation is defined to include CCSAS, PRISM, DCSS, and CAMP. The IV&V Service Provider who supplies these services shall review and make recommendations on the following areas of planning and development processes as described in this report:

- Project Initiation
- Project Organization
- Project Planning and Reporting
- Quality Assurance
- Requirements Management
- County Technical Oversight

- County Transitions

IV&V services will be required until such time that California successfully implements and receives Federal certification of CCSAS for all requirements of the Family Support Act (FSA) of 1988 and the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), as delineated in this report. The acquisition of this "IV&V Service Provider," either through a formal procurement of contract resources or Interagency Cooperative Agreement, will need to commence immediately. To assist the State in this regard, this report's recommendations are structured to present specific IV&V tasks that can be included in the Statement of Work of an IV&V Service Provider. Services of the State's IV&V Service Provider must include all California Child Support Automation. **The IV&V Service Provider must supply all plans, reports of findings, and recommendations to ACF Central and Regional Offices at the same time that they are supplied to the State, as specified in 45 CFR 307.15(b)(10)(ii).**

IV&V SERVICE PROVIDER

The State must move to begin the identification of requirements for and formulation of a Scope of Work for ongoing IV&V services to California Child Support Automation. It is incumbent on the State to begin the acquisition process for these services now to avoid any schedule delays. Therefore, the State should immediately pursue the identification of potential IV&V resources in-State. If these resources, independent of State's Title IV-D and its umbrella agency, cannot be identified then a contract procurement effort must be initiated. This report has been designed to provide the State with a series of initial recommendations that can be incorporated into a Scope of Work for the project's IV&V Service Provider. To further support the State's IV&V process, OCSE is committed to providing the State with technical assistance in the form of documentation review and recommendations, as needed, to assist the State in the acquisition/ procurement of an IV&V Service Provider.

PRIOR APPROVAL

The Request for Proposals (RFP) and contract (or similar documents if IV&V is performed by another State agency) must be submitted to ACF for prior approval, regardless of the cost or contractual arrangements. The IV&V services contract or agreement with a State agency must include the names and qualifications of key personnel who will actually perform the IV&V services. **For all IV&V activities, the State must submit an Advance Planning Document Update (APDU) for the CCSAS project addressing in sufficient detail the IV&V activities and related costs eligible for Federal financial participation (FFP) at the applicable matching rate.**

IV&V DURATION

IV&V must be performed at initial activation of the IV&V Service Provider contract or State agency agreement. Thereafter, the IV&V services must be performed as an on-going activity until such time that California successfully implements and receives Federal

certification of CCSAS for all FSA of 1988 and PRWORA requirements. ACF will periodically reevaluate the IV&V scope of work and frequency requirements based upon project progress or when one or more of the IV&V triggers occurs, as described in 45 CFR 307.15(b)(10)(i), such as failure to meet a critical Advance Planning Document (APD) milestone.

INDEPENDENT VERIFICATION AND VALIDATION (IV&V) ASSESSMENT REVIEW REPORT FOR THE CALIFORNIA CSES PROJECT

1 INTRODUCTION

As a result of missing the October 1, 1997, Federal certification deadline for operating a statewide, comprehensive automated system meeting the requirements of the Family Support Act of 1988, the State of California's Child Support Enforcement System (CSES) became subject to the mandatory provisions of 45 CFR 307.15(b)(10). These provisions require an entity independent of the State to review and report on all technical and managerial aspects of the project. ACF requested a review of the current documentation of the system, as well as current and future management planning for the project, in order to make recommendations on the scope of the IV&V services that the State will be required to obtain.

1.1 Background

As a result of ACF's request, an assessment to determine the required scope of IV&V for the California CSES was held on February 1-2, 2000. The Federal assessment team consisted of:

Mike Rifkin	ACF/OCSE/OAPO/DCSIS	John Schambre	ACF/Region IX
Dave Tabler	BAE SYSTEMS	Pat Colonnese	ACF/Region IX
Valerie Moore	ACF/Region IX		

The first day of this assessment was conducted at the Franchise Tax Board offices. State representatives in attendance included:

Elaine Moody	DCSS	Jean Fredericks	FTB
Michael Coleman	DCSS	Carlos Zamarippa	FTB
Curtis Howard	DCSS	Sharyn Matsumoto	FTB
Joan Hanacek	FTB	Lillie Yee-Shiroi	FTB
Cher Woehl	FTB	Jan Sherwood	FTB

The second day of the assessment was held at the Department of Child Services office. State representatives in attendance included:

Elaine Moody	DCSS	Cheryl Hotaling	PRISM
Joanne Jensen	DCSS	Evan Auberry	PRISM
Curtis Howard	DCSS		

1.2 Methodology

Each daily meeting began with discussions relative to the IV&V assessment. After these initial discussions, the remainder of each day was spent on other system areas, including APD questions and comments, corrective compliance plan questions and comments, quarterly reporting, financial reporting, organizational structure, and future APD Updates. The findings and recommendations in this report were derived from a combination of all of these discussions. Day One was spent discussing the CCSAS project. Day Two focused on the PRISM project.

Since the California CSES project is in the planning stages, little documentation was available for review. The State's Corrective Compliance Plan (CCP), the PRISM project's Advance Planning Document Update (APDU), and the CCSAS project's Planning Advance Planning Document Update (PAPDU) were provided prior to the meetings to allow time for review by the assessment team. In addition, during a break on Day Two, one member of the Federal Team was given a demonstration of the PRISM project's tool for development of system requirements for the county interim systems.

2 FINDINGS

The findings in this report are based on the discussions held with State staff during February 1-2, 2000, and upon the January 1, 2000, APD submittals. Because of the unique organizational structure in California, these findings are divided into three sections. Section 2.1 provides findings relating to DCSS organization and management. Section 2.2 provides findings relating specifically to the new single statewide system development project, CCSAS. Section 2.3 provides findings relating specifically to the interim systems project, PRISM.

2.1 DCSS Findings

The findings in this section relate to the newly-established Department of Child Support Services (DCSS). DCSS representatives were present at both days of the meetings. These findings relate to both days' discussions.

2.1.1 Project Initiation

DCSS was officially established effective January 1, 2000, and is therefore in the early stages of defining its organizational structure and responsibilities. At the time of this review, the new director for DCSS had been selected by the governor, but was awaiting approval by the State legislature. Due to the on-going restructuring of the organization of California's child support program, there does not yet appear to be a clear definition of roles. This lack of project organization is apparent not only within DCSS, but also in the definition of DCSS's leadership role in the interim system support and new statewide system development projects.

2.1.2 Project Organization

Each project (PRISM and CCSAS) had developed an organization chart, however, an overall statewide project organization chart showing lines of authority between DCSS and the individual projects has not yet been developed. In addition, the State has not yet developed an Interagency Cooperative Agreement outlining the roles and responsibilities between DCSS, FTB, HHSDC, and any other State agencies involved in the California Child Support Automation project. While some of this information is provided by State legislation, such legislation is not sufficiently detailed to meet OCSE requirements. Further, although various project team member responsibilities were described to the IV&V assessment review team, not all organizational roles and responsibilities were addressed. In particular, the role of DCSS in the coordination and control of the two projects was not clearly defined.

2.1.3 Independent Verification and Validation (IV&V)

The State's current plan is to obtain IV&V services for the CCSAS project, but not for the PRISM project. The procurement process for the IV&V vendor appears to be planned as an FTB function. The State must ensure that all California Child Support Automation projects are included in the IV&V review process and that the procurement and management of the IV&V contract resides in an agency which is separate from DCSS, FTB, and HHSDC.

2.2 CCSAS Findings

Under the direction of DCSS, the California Franchise Tax Board (FTB) has the responsibility for development, implementation and maintenance of the new California Child Support Automation System (CCSAS). The findings in this section are specific to this project.

2.2.1 Project Organization

Lines of authority and reporting requirements between FTB and DCSS are not yet clearly defined. The project's Planning APD indicates intent to create a Project Charter, which will gain consensus between key stakeholders at the beginning of the project. The Planning APD also indicates intent to establish a governance structure, which will define the roles of the various stakeholders in the CCSAS project.

2.2.2 Project Planning and Reporting

As discussed in their PAPD, the CCSAS project plans to use a new system procurement strategy. This procurement methodology uses a phased procurement approach consisting of multiple "solicitations for conceptual proposals" (SCP's). The SCP process results in a proposed solution to the project's "business problem"¹ from each vendor competing for the contract. It is not clear how the State will then combine these alternatives into a single feasibility study which includes the required Federal alternatives ("Status quo" and a transfer system).

The State then uses a process of "best value evaluation" to select the vendor solution best solving the business problem. This process considers the quality of the proposed business solution, the risks associated with the solution, and the benefits derived from the solution. Cost is not a factor in the evaluation process. In order to meet Federal regulations, the State must develop a cost/benefits analysis which considers quality, risk, benefits, and cost. It is not clear how the State will accomplish development of the cost/benefit study.

¹ Instead of performing analysis and documentation of requirements in the procurement process, the Performance Based Procurement Model first develops a business case by defining a business problem and a high level conceptual plan for developing solutions.

The project's Planning APD does not include plans to perform Federally mandated feasibility, alternatives and cost/benefits analyses for the CCSAS project. The State has not yet provided an explanation of how these Federally required analyses will be developed in the context of their unique procurement methodology.

2.2.3 Quality Assurance (QA)

The State currently plans to procure both an IV&V provider and a QA organization for the CCSAS project. As discussed earlier, Federal requirements are for the IV&V contract to be independent of the projects and DCSS. The IV&V services must be provided to all California Child Support Automation projects. The current plan to have a separate QA organization for the CCSAS project is acceptable and encouraged.

2.3 PRISM Findings

Under the direction of DCSS, the California Health and Human Services Agency Data Center (HHSDC) has the responsibility for operating the State's interim child support enforcement program, known as the Pre-Statewide Interim Systems Management (PRISM) project. The findings in this section are specific to this project.²

2.3.1 Project Organization

Lines of authority and reporting requirements between the PRISM project and DCSS are not yet clearly defined. In particular, the role of DCSS is not clear. The organization chart provided in the project's Implementation Advance Planning Document (IAPD) only shows a dotted line from the PRISM Project Manager to DCSS. This implies either there will be only minimal control by DCSS or that there is a lack of necessary documentation of the lines of authority, oversight, and control by DCSS. The DCSS role in the PRISM project needs to be further clarified.

2.3.2 Quality Assurance

The PRISM project does not have a formal Quality Assurance (QA) function as part of their organization. However, vendor staff is present to perform tasks such as development and maintenance of processes, procedures, and standards; development and maintenance of specialized tools and documentation management; and assisting in the development and maintenance of project work plans. Collectively, this staff could be regarded as QA for the

² Because the PRISM project is more established, the IV&V assessment team was able to review this project in more detail than the newly-established CCSAS and DCSS organizations. As a result, this report contains more findings for PRISM than for these other organizations. This should not be misinterpreted to mean the PRISM project is more problematic than the other projects.

PRISM project, though without a formal QA structure defined for this project it is unclear whether resource constraints, risk analyses, or similar considerations are incorporated.

2.3.3 Requirements Management

The State is in the process of developing a set of CSE automation requirements for the county systems. These automation requirements will fall primarily into two categories, system requirements and functional requirements. The system requirements are being developed in a database which was demonstrated during the February 2, meetings. These system requirements are based on the Federal Certification Guide, Federal regulations, and some specific action transmittals. Also included are requirements taken from State legislation.

State staff indicated they are still in the process of augmenting these system requirements with other, functional requirements for county systems. During the February 2, 2000, meeting with DCSS and PRISM staff, OCSE was asked by the State to provide recommendations for items to include in this list. These are included in this report, in Section 3.3.3 under PRISM Recommendations.

2.3.4 County Technical Oversight

There is currently no single organization responsible for interfacing with the counties. If, for example, a county were to have a question about state requirements for their system, State personnel indicated the county would currently not have a single State resource to call upon.

Also, counties are responsible for all aspects of system development, implementation, and maintenance for their child support systems. The State, under the newly formed DCSS and PRISM projects, must take a more active role in monitoring these activities and for providing guidance at the State level. For example, the individual training plans, security plans, software development plans and other development documentation exist only at the county level. Our review found a lack of coordinated oversight for these disparate county automation projects, including uniform requirements management and programming standards for similar platforms, software models, design requirements, and development methodologies.

2.3.5 County Transitions

The State is in the process of developing a transition plan for counties that have not yet transitioned to one of the four approved interim systems. State personnel reported during the February 2, meeting that they are on schedule for providing a May 1, 2000, update to their APD which will provide detailed plans for transition of counties to one of the four approved systems, or a cost effectiveness evaluation for counties they would like to remain on legacy systems.

3 RECOMMENDATIONS

The IV&V assessment team provided the following recommendations to the State's CSES project management team during the course of the two-day onsite visit. Additional recommendations are also presented herein based upon the analyses conducted of the State's APD documentation after the onsite portion of the review. As with the "Findings" section above, these recommendations are divided into three sections. Section 3.1 provides recommendations relating to DCSS organization and management. Section 3.2 provides recommendations relating specifically to the new single statewide system development project, CCSAS. Section 3.3 provides recommendations relating specifically to the interim systems project, PRISM.

3.1 DCSS Recommendations

The recommendations in this section relate to the newly-established Department of Child Support Services (DCSS). DCSS representatives were present at both days of the meetings. These recommendations are based upon both days' discussions.

3.1.1 Independent Verification and Validation (IV&V)

The State must acquire Independent Verification and Validation services in accordance with 45 CFR 307.15(b)(10). These services can be obtained from a contractor via a Request for Proposal (RFP) or from an independent State agency. If a contractor is used, the RFP and contract must be submitted to ACF for prior approval, regardless of the cost or thresholds. The contract must include the names, experience, and skills of key personnel who will actually perform the IV&V analyses. If IV&V is performed by another State agency, similar, equivalent documentation must be submitted, usually taking the form of a detailed Interagency Cooperative Agreement. The State must then submit an Advance Planning Document Update (APDU) describing in sufficient detail, the prescribed IV&V activities, work products, and costs eligible for Federal financial participation.

This IV&V activity should describe three separate levels of IV&V services. The first level, the *IV&V Planning Review*, is a one-time review of the methodologies used in the State's project feasibility study to ensure that study was conducted in a manner that was measurable, repeatable, and with a verifiable methodology. This planning review will provide further input supplementing the information contained in this IV&V Assessment Review report. This report, and the recommendations to be presented in the IV&V Planning Review report are intended by OCSE to assist the State in defining in some detail the required scope and frequency of future IV&V reviews.

The second level of IV&V services will consist of ongoing monitoring of the overall status and management of the project's development effort. This level of IV&V will also review

the interim systems management project and may also include reviews of individual county interim system projects as deemed necessary by the State's PRISM project. Many aspects of this level of IV&V services are briefly described in this report, and will be further defined by the IV&V Planning Review.

The third level of IV&V services are full technical reviews of various facets of the system's software and hardware operation and performance, and documentation maintenance, as needed. Each of these levels of IV&V services is discussed in detail below. **In each case, the IV&V Service Provider must supply all plans and reports of findings and recommendations to OCSE Central and Regional Offices at the same time that they are supplied to the State, including draft documents submitted for comment.**

3.1.2 IV&V Planning Review

The IV&V Planning Review will provide OCSE and the State assurance that the methodology used to conduct the Feasibility Study for the CCSAS project was objective, measurable, repeatable and verifiable. This review will concentrate on the verification and validation of the Feasibility Study documentation and of the processes used to perform this analysis. While, for most State's, this review is the initial IV&V review performed for the project, it is expected that California will already have an IV&V provider in place conducting the On-Going IV&V reviews described in section 3.1.3 below. A secondary work product of this review will be supplemental input, as needed, to the State's IV&V Management Plan. This review will supplement information to be included in the State's forthcoming Implementation Advance Planning Document (IAPD).

3.1.3 On-Going IV&V Reviews

IV&V will be required to ensure the project is on schedule and that requirements are being met for Federal certification. The frequency and task level of these reviews will be defined in the IV&V Management Plan. Reviews will encompass all areas of California Child Support Automation, including DCSS, CCSAS, PRISM, CAMP, and interim county systems. These reviews will require the IV&V Service Provider to assess system development in areas including, but not limited to, the following:

- a) Analyze project management and organization, evaluate project progress, resources, budget, schedules, work flow, reporting and contractor oversight.
- b) Assess California interagency coordination and management to include project dependencies and critical path methodologies.
- c) Review and analyze project management planning documents.
- d) Review and analyze project software development documents.
- e) Review and analyze processes to ensure they are being documented, carried out, and analyzed for improvement.

- f) Monitor the performance of the QA contractor/organization by reviewing its reports and performing spot checks of system documentation.
- g) Assess and recommend improvement, as needed, to assure continuous stakeholder buy-in, support and commitment, and that open pathways of communication exist among all stakeholders.
- h) Assess and recommend improvement, as needed, to assure lines of communication between vendor staff and State management are in place and engaged.
- i) Assess and recommend improvement, as needed, to assure appropriate user and developer training is planned and carried out.
- j) Assess and recommend improvement, as needed, to assure establishment and maintenance of a data center, including data center input to the project regarding operational and maintenance performance of the application.
- k) Assess and recommend improvement, as needed, to the risk management plan and conduct periodic risk analyses to identify, analyze, and mitigate risks.
- l) Review and analyze system capacity studies.
- m) Review system hardware and software configuration and report on any compatibility and obsolescence issues.
- n) Assess and recommend improvement, as needed, to assure software testing is being performed adequately through review of test plans or other documentation and through direct observation of testing where appropriate, including participation in and coordination of peer reviews.
- o) Develop performance metrics, which allow tracking of project completion against milestones set by the State.
- p) Report on the State's efforts to address the findings and recommendations from this IV&V Assessment Review Report, as well as the forthcoming IV&V Planning Review.

Some of the above tasks may be assigned to the State's Quality Assurance (QA) provider. In that case, the IV&V provider would be responsible for ensuring these tasks are being performed through the review of QA products and reports.

3.1.4 Full Technical IV&V Review

In addition to the reviews discussed in the previous section, the State should consider employing full technical (software and hardware) IV&V reviews. These reviews could be prompted by major milestones in the project's development cycle such as program version turnover or completion of a test phase. A full technical review may also become necessary as a result of significant findings during the periodic IV&V reviews, such as a need to assess application performance or system capacity issues. These reviews may also be initiated by the State to give them assurance that the project's code base, documentation, etc., is in good

shape and to identify and address any problems before they become unmanageable. Full technical IV&V reviews may include, but not be limited to the following areas of review for remediation and elimination of deficiencies:

- a) Perform a detailed review of the system documentation (Requirements, Design, Training, Test, Management Plans, etc.) for accuracy and completeness.
- b) Perform a detailed review of the software architecture for feasibility, consistency, and adherence to industry standards.
- c) Inventory and review the application software for completeness and adherence to programming standards for the project.
- d) Review the traceability of system requirements to design, code, test, and training.
- e) Analyze application, network, hardware and software operating platform performance characteristics relative to expected/anticipated/contractually guaranteed results and industry standards/expectations.
- f) Review interim county systems to assure adherence to State and Federal requirements and to assure platform consistency in similar county systems.

3.1.5 IV&V Management Plan

Many of the recommendations contained in this report are presented to the State in the form of general requirements for the State to incorporate into what this review refers to as an "IV&V Management Plan³." The plan should be one of the first deliverables created by the State in collaboration with its IV&V Service Provider. These recommendations are intended to assist the State in the creation and refinement of an acquisition/procurement document's Scope of Work for the eventual solicitation of an IV&V Service Provider. This IV&V Management Plan will then be refined and finalized based upon the IV&V Service Provider's detailed Technical Proposal to the State's IV&V solicitation (e.g., Scope of Work in a Request for Proposal) document. If the IV&V Service Provider is to be a State agency, the IV&V Management Plan, incorporating these recommendations, will be jointly constructed as part of an interagency agreement defining the roles and responsibilities between the Title IV-D agency and the State agency serving as the IV&V Service Provider. OCSE is committed to providing ongoing technical assistance to the State relative to the creation and finalization of a comprehensive Statement of Work for the acquisition of a IV&V Service Provider, as well as in consultation and coordination with the State on all aspects of project management and organization.

Figure 1 presents an estimated timeline representing an appropriate order for the major milestones in the planning phase, from the issuance of this report through to the final submission for Federal review and approval of an Implementation Advance Planning Document. While this

³ The need for an IV&V Management Plan, beyond its use as a basis for a Scope of Work for an IV&V Service Provider (whether contract or State agency) is as a detailed plan of action for periodic independent reviews of the CSES project's critical development and implementation phase procurements, milestones and deliverables.

timeline is typical for most States' planning phase, the unique nature of the California project

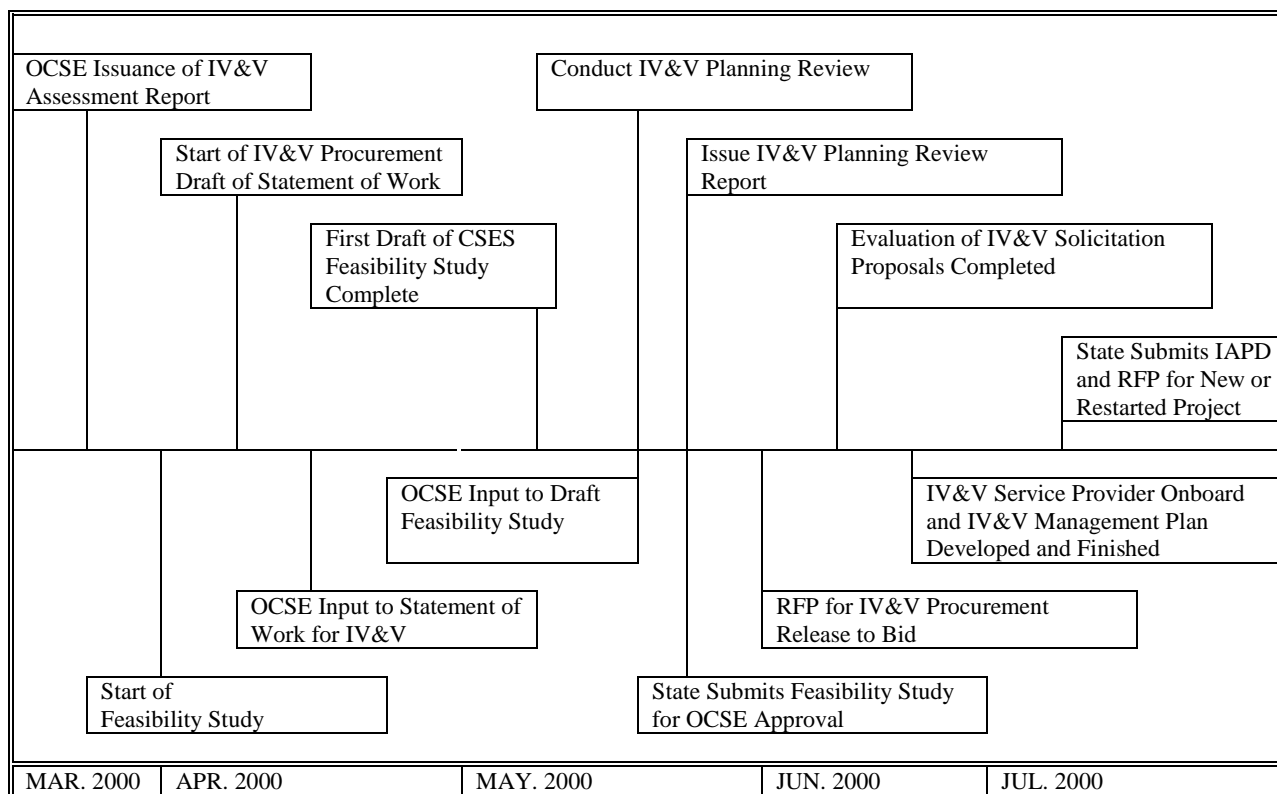


Figure 1. Estimated Critical Milestones Schedule in California IV&V Procurement

may affect this timeline. The State must develop a timeline appropriate for their unique system development methodologies which includes the events shown in Figure 1.

3.1.6 Project Initiation

The organizational structure of DCSS and the organizational relationships between DCSS and the PRISM and CCSAS projects must be clearly defined. The State's IV&V provider will be responsible for reviewing this organizational structure and ensuring lines of communication and control are established and functional within California Child Support Automation.

3.1.7 Project Organization

During the February 1-2, meetings, the State was advised that an organization chart of the overall State program would be required as a condition for approval of their Corrective Compliance Plan. The State must demonstrate through this organization that DCSS is in overall control of both the interim system support and new statewide system development projects. In addition, the State must provide an Interagency Cooperative Agreement outlining the roles and responsibilities between DCSS, FTB, HHSDC, and any other State

agencies involved in the California Child Support Automation project. The State's IV&V provider will continually review the organization and make recommendations where overall management of the California CSES project by DCSS can be improved.

3.2 CCSAS Recommendations

Under the direction of DCSS, the California Franchise Tax Board (FTB) has the responsibility for development, implementation and maintenance of the new California Child Support Automation System (CCSAS). The recommendations in this section are specific to this project.

3.2.1 Project Organization

As stated earlier, lines of authority and reporting between FTB and DCSS must be clearly defined. The State's IV&V provider will continually review the organization and make recommendations where CCSAS management of the new system development and communications within California Child Support Automation can be improved.

3.2.2 Project Planning and Reporting

The State was informed during the February 1-2, meetings that they will need to show an intent and schedule to conduct feasibility, alternatives, and cost/benefits analyses as a condition for approval of the CCSAS PAPDU. These analyses must be completed and documented in the CCSAS IAPD. Section 3.1.5, Table 1 provides an estimated timeline representing an appropriate order for the major milestones in the development of these analyses, from the issuance of this IV&V assessment report through to the final submission for Federal review and approval of an IAPD. The State must determine how they will accomplish these requirements within the context of their unique procurement methodology and provide documentation of this process and a schedule for completion to OCSE. An IV&V review of the methodologies used in developing the feasibility, alternatives, and cost/benefits analyses must be conducted by the State's IV&V provider.

3.2.3 Quality Assurance (QA)

The QA services provider should be required to define, provide and support a thorough QA methodology. Once the State has the appropriate QA processes and product review methodologies defined and in place, the QA job will consist primarily of ensuring the processes are followed, measuring product quality, and working on continuous improvement of the process in order to further improve product quality. The QA organization should exist independently from other functional areas of the project's organization, though ultimately the QA provider must report to the CCSAS software project manager. The software project manager will work with and, therefore, ultimately be responsible for ensuring that defined and required QA tasks are conducted and that all project processes are followed.

3.3 PRISM Recommendations

Under the direction of DCSS, the California Health and Human Services Agency Data Center (HHSDC) has the responsibility for operating the State's interim child support enforcement program, known as the Pre-Statewide Interim Systems Management (PRISM) project. The recommendations in this section are specific to this project.

3.3.1 Project Organization

As stated earlier, lines of authority and reporting between PRISM and DCSS must be clarified. The State's IV&V provider will continually review the project's organization and make recommendations where PRISM management of the interim county systems and communications within California Child Support Automation can be improved.

3.3.2 Quality Assurance

Since the current plans are to have a QA organization within the CCSAS project, it is recommended a QA project also be organized within the PRISM project. The QA provider would be responsible for the tasks currently performed by the vendor staff currently residing in PRISM. These tasks include development and maintenance of processes, procedures, and standards; development and maintenance of specialized tools and documentation management; and assisting in the development and maintenance of project work plans. In addition, the QA provider would be available to aid the State in performance of periodic quality reviews of the interim systems, as needed. The QA provider will also need to assure consistent and compatible development of software among the interim system platforms to the greatest extent possible. We will require the State's IV&V provider to monitor these QA activities and to give recommendations on whether existing vendor roles can and should be structured into a more formal QA organization within the PRISM project.

3.3.3 Requirements Management

The county requirements documentation remains in development by the State. The State must determine a schedule for completion of this documentation and its provision to the counties. The State's IV&V provider will want to review this documentation as part of their review. Also, there do not appear to be any plans to share this system requirements documentation with the CCSAS project. DCSS, as the State's overall child support agency, should ensure that appropriate communications between the PRISM and CCSAS projects are in place. It seems reasonable that the information in the PRISM project's system requirements database could easily be reused by CCSAS to help develop requirements for the single statewide system. The State's IV&V provider should also provide recommendations on the sharing of information and work products between PRISM and CCSAS.

Once these system requirements have been provided to the counties, the State needs to determine how they will ensure the requirements are being met. At a minimum, they should require each interim system project to perform a self-evaluation, incorporating these requirements as a guide with results reported to the State. Ideally, the State would conduct these evaluations or be involved in the evaluations at some level.

Recommendations for functional requirements for inclusion in the requirements document for counties follow:

- a) All counties using a particular interim system application must be using the same version of that application.
- b) Source code for each interim system should reside only in the county responsible for the development and maintenance of the system software.
- c) Individual counties will not be permitted to make unique modifications to their system unless all other counties using that interim system adapt that change. The change must be for a State or Federal requirement, or the counties must prove to the State and to OCSE that the change is cost effective.
- d) Each interim system must run on a single platform.
- e) Each interim system project will provide a periodic (monthly is recommended) report to the State showing the progress the project has made in the previous reporting period, the planned goals for the next reporting period, and any issues requiring State attention for that interim project.
- f) Each interim system project will conduct an evaluation of their system using the system requirements document provided by the State as a guide. The State may choose to provide an observer to participate in these evaluations or to conduct the evaluations themselves.
- g) Each interim system must comply to PRWORA distribution requirements.
- h) Each county interim system must provide copies of all system development and process definition documentation to the State. If this documentation does not exist for a particular system, this will allow the State to provide documentation from another system for their use. This will also allow the State to promote cooperation between counties in their development and maintenance efforts. Finally, this will allow the State to maintain a single repository of this documentation for use by their IV&V and QA providers.
- i) Each interim system must have a Change Control Board in place. This board will be required to provide a period report to the State to show the status of pending and completed changes to the county systems.
- j) Each interim system will be subject to reviews by the State PRISM project. These reviews may be conducted by PRISM project personnel or by the State's IV&V provider.

3.3.4 County Technical Oversight

When defining the organizational structure of the PRISM project and DCSS, the State must also make it clear to the counties where their point of contact(s) will be with the State. The State's IV&V provider must monitor communications between the counties and the State to ensure information is flowing in both directions through a well-structured information flow.

The State must ensure that the counties are developing and maintaining the documentation required for the development, implementation, and maintenance for their child support systems. Once the number of county systems has been reduced to the four approved systems, managing these systems at the State level will be more feasible. The State should plan to conduct periodic reviews of these county systems. Use of QA and/or IV&V staff should be included in these plans.

3.3.5 County Transitions

The State's IV&V provider must monitor county transitions to ensure schedules are being met and to make recommendations on ways to make these transitions go smoothly. It is also recommended that the IV&V provider periodically review county systems for adherence to State defined requirements. A plan for such periodic reviews should be incorporated into the IV&V Management Plan.

GLOSSARY

APD	Advance Planning Document
APDU	Advance Planning Document Update
CAMP	California Arrearage Management Project
CCP	Corrective Compliance Plan
CCSAS	California Child Support Automation System
CFR	Code of Federal Regulations
CSES	Child Support Enforcement System
DCSS	Department of Child Support Services
FFP	Federal Financial Participation
FSA	Family Support Act (of 1988)
FTB	Franchise Tax Board
HHSDC	Health and Human Services Agency Data Center
IAPD	Implementation Advance Planning Document
IV&V	Independent Verification and Validation
OCSE	Office of Child Support Enforcement
PAPDU	Planning Advance Planning Document Update
PRISM	Pre-Statewide Interim Systems Management
PRWORA	Personal Responsibility and Work Opportunity Reconciliation Act of 1996
QA	Quality Assurance
RFP	Request for Proposal
SCP	Solicitation for Conceptual Proposal