



NCCSD

*National Council of
Child Support Directors*

Annual Business Meeting

Part 1: July 19, 2021

Medora, North Dakota
and via Microsoft Teams

Part II: July 22, 2021

Bismarck, North Dakota
and via Microsoft Teams



Annual Meeting
July 19, 9:30-11:30 AM Mountain
July 22, 2021, 3:30-5:30 PM Central

AGENDA

Monday

[Join Microsoft Teams Meeting](#)

+1 701-328-0950 United States, Fargo (Toll)
Conference ID: 151 918 914#

Thursday

[Join Microsoft Teams Meeting](#)

+1 701-328-0950 United States, Fargo (Toll)
Conference ID: 628 893 05#

Monday

- 9:30 – 9:45 Welcome and Roll Call
- 9:45 – 10:15 Officer reports
- President
 - Secretary
 - Treasurer
- 10:15 – 10:20 Report of Nominating Committee and election of officers
- 10:20 – 10:30 Election of regional representatives
- 10:30 – 10:40 Break
- 10:40 – 10:45 Announcement of regional representatives
- 10:45 – 11:30 Committee Reports
- Audit Workgroup – Michele
 - Child Support-Employer Collaboration Workgroup – Jim
 - Finance Committee – Liesa
 - Joint Committee on Public Relations – David
 - Mentoring Committee – Karen
 - Policy and Practice Committee – Eileen, Carol
 - System Modernization and Data Sharing Workgroup – Carla, Robin
 - Website Committee – Kate
- 11:30 Lunch and Recess until Thursday, 3:30 PM Central

Thursday

- 3:30 – 4:00 Meeting with Cynthia Longest to present the new State Systems site on the OCSE Collaboration Tool.
- 4:00 – 4:30 Committee reports continued
- 4:30 – 4:40 Break
- 4:40 – 4:55 Unfinished business
- Study of Cost Avoidance
- 4:55 – 5:30 New business
- Use of Reserves
 - OCSE Commissioner vacancy
 - Fall “Closed Door” meeting with OCSE
 - Walk-on
- 5:30 Adjourn



NCCSD

*National Council of
Child Support Directors*

2021 President's Report

Jim Fleming, President

July 19, 2021



TO: NCCSD
FROM: Jim Fleming, NCCSD President
DATE: July 19, 2021
RE: Annual President's Report

It probably goes without saying that the pandemic has continued to have significant impact on state programs and directors. I am thankful for the vaccines and the ability to have our annual meeting in person. It will be a welcome relief to see each other after so long. Although the workload of the year so far is not typical, it appears to me like a possible gap is emerging between what we would like to accomplish as an organization and what we can accomplish as a volunteer organization of very busy people.

Below are some highlights of the last 10 months for NCCSD:

- Our meeting with Assistant Secretary Johnson did not yield much in the way of results. As we all know, we have gone more than a year without an OCSE Commissioner. From nearly three years of monthly meetings with OCSE, both before and after the previous commissioner left, there seems to be a practical limit on what OCSE provides in the way of guidance or policy decisions in the absence of a commissioner.
- A large group of interstate experts provided comments on OCSE's draft Action Transmittal on intergovernmental case processing. The final AT did not adopt all of NCCSD's comments, but the AT was accompanied by a response from OCSE to some of the comments. This response was helpful because it explained OCSE's position and thought process regarding current regulations. I think it will guide NCCSD to suggest changes to existing regulations.
- OCSE attempted to form a resilience workgroup, but later we mutually agreed that the effort would be postponed indefinitely. It seemed to me that the effort, which did not involve NCCSD as an organization, revealed a difference between the operational side of OCSE which works with one state at a time and a commissioner who works with NCCSD at a national level.
- NCCSD adopted an extension to its pandemic impact paper in the specific area of retroactive modifications.
- In September, the Strengthening Families for Success Act was introduced, which was a catalyst for a lot of conversation on the role (or lack thereof) of retained

collections in the current IV-D program, whether referrals from IV-E should be refined, and the pros and cons of PRWORA and DRA distribution.

- Offsets of Economic Impact Payments continued to challenge states. Many states knew there were offsets stemming from EIPs to joint filers where the injured spouse portion of the offset had yet to be reversed. Eventually, IRS acknowledged it had underestimated the number of such cases and agreed it would not initiate further reversals.
- NCCSD compiled suggested changes to OCSE's guide for amending child support orders. Many of these changes were incorporated in the final update.
- States, through NCCSD, shared best practices for Stafford Act Waiver requests.
- NCCSD monitored the various Congressional proposals for stimulus payments to find clarity on whether such payments would be subject to offset, and when it made a difference if the payment was made independently or claimed as a credit on a person's annual tax return.
- NCCSD continued to ask OCSE for PEP relief and successfully obtained a timeline for imposition of penalties based on FY 2020 performance.

Some areas of interest in the last year remain pending:

- The previous administration proposed a rule, supported by NCCSD, to create two exceptions to the requirement to undertake a review when a parent is incarcerated for more than six months: incarceration for willful failure to pay child support and incarceration for a crime against the child. It is unclear whether the new administration will complete the rule.
- Roughly 15 states continue to face a penalty for lack of sufficient performance or improvement in their paternity establishment percentage. OCSE has announced intent to propose a rule change in December 2021, and NCCSD will no doubt need to comment on whatever is proposed.

Please see the secretary's report for a complete list of our official actions for the year.

The last two years have been hard for all of us, but I think we have made lasting program improvements as a result of the lessons learned during the pandemic. It has been an honor to serve NCCSD during this time, but I will also be happy to complete the year and join my dear friends Erin, Craig, and Wally as a PAST NCCSD President. Our organization is strong and has a great future.

Respectfully Submitted,

Jim

Jim Fleming
NCCSD President 2019-2020



2021 Secretary's Report
Kate Cooper Richardson, Secretary
July 19, 2021



Relevant Excerpts of the Bylaws

Article IV, Paragraph D:

The Secretary shall prepare a summary of the events and actions that take place at each meeting of the Council. This summary shall be completed within thirty days of the conclusion of the meeting. The Secretary shall also prepare a summary of events and actions that take place at each meeting or conference call of the Executive Committee. Such summaries shall be completed within twenty-one days of the conclusion of the meeting or call. Copies of summaries from all meetings and calls shall be distributed to all Council members electronically, via either e-mail or posting on the NCCSD website. The Secretary shall serve as Parliamentarian during all meetings. When the Secretary is unavailable for a meeting, the President may appoint a Parliamentarian for that meeting.

The Secretary shall be the custodian of the Bylaws, Resolutions, and Minutes of the Council for the current year. Upon the conclusion of the year, the original records mentioned above as well as the financial records, and other records as deemed appropriate by the President for the year concluded, will be stored, along with all previously archived Council records, in storage in a location determined by the Executive Committee. Such records will be placed into storage after the completion of the annual review of the financial records and the filing of the taxes. Copies of all of the Council's records for the year completed will be forwarded to the incoming Secretary by October 31. Copies of the prior year's Council records, as requested, will also be sent to the incoming President.

Article VIII, Paragraph B:

The business of the Annual Meeting of the Council shall include ... [a] Report of the Secretary.



Council Members:

Please accept this brief annual summary of NCCSD activity and data for which the NCCSD Secretary maintains records.

Council Membership and Rosters

As set forth in the NCCSD bylaws, the Council membership comprises the directors “of the IV-D child support enforcement program of each state and territory,” which number 54 without vacancies. The 2020-21 year saw the departure of nine (!!!) IV-D directors: Tangler Gray (GA), Carol Eaton (IA), Mary Bartolomucci (IL), Lydia Scales (LA), Lyndsy Landry Irwin (MS), Jeremy Toulouse (NM), Stephanie Garcia Vidal (PR), Gail Stoltenberg (SD), and Sharon Santilli (RI). Membership was added for new IV-D directors John Hurst (GA), Konitra Jack (LA), Chad Shook (MS), Terilyn Sastre Fuente (PR), and Frank DiBiase (RI). Barbara Morris-Williams (AR) moved from interim/acting to permanent IV-D Director. Heather Noble (AZ) returned from temporary reassignment. Interim/acting IV-D directors added during this committee year are Kylie Claycomb (IA), Bryan Tribble (IL), and Betina Gonzales McCracken (NM). Current NCCSD membership:

| | |
|-------------------------|-----|
| Carol Beecher | AK |
| Lathesia McClenney | AL |
| Barbara Morris-Williams | AR |
| Heather Noble | AZ |
| David Kilgore | CA |
| Larry Desbien | CO |
| John Dillon | CT |
| Sophia Hollis Ticer | DC |
| Ted Mermigos | DE |
| Ann Coffin | FL |
| John Hurst | GA* |
| Andrew Perez | GU |
| Lynette Lau | HI |
| Rob Rinard | ID |
| Bryan Tribble | IL* |
| Adam Norman | IN |
| Kylie Claycomb | IA* |
| Elizabeth Cohn | KS |

| | |
|---------------------------|-----|
| Lily Patteson | KY |
| Konitra Jack | LA |
| Michele Cristello | MA |
| Kevin Guistwite | MD |
| Jerry Joy | ME |
| Erin Frisch | MI |
| Shaneen Moore | MN |
| John Ginwright | MO |
| Chad Shook | MS |
| Chad Dexter | MT |
| Carla West | NC |
| James Fleming | ND |
| Cindy Wiesen | NE |
| Karen Hebert | NH |
| Patricia Risch | NJ |
| Betina Gonzales McCracken | NM* |
| Cathy Kaplan | NV |
| Eileen Stack | NY |

| | |
|------------------------|-----|
| Jeffrey Aldridge | OH |
| Renee Banks | OK |
| Kate Cooper Richardson | OR |
| Robert Patrick | PA |
| Terilyn Sastre Fuente | PR |
| Frank DiBiase | RI |
| Tim Mose | SC |
| Nichole Brooks | SD* |
| Robert Duck | TN |
| Ruth Anne Thornton | TX |
| Liesa Stockdale | UT |
| Barbara Lacina | VA |
| Terrence Joseph | VI |
| Robin Arnell | VT |
| Sharon Redmond | WA |
| Debra Barnes | WI |
| Garrett Jacobs | WV |
| Kristie Arneson | WY |

**acting or interim*

Meetings and Summaries (Minutes)

The NCCSD Annual Business meeting was held virtually over two days, July 28-29, 2020. The minutes of the annual meeting were approved at the September 17 Executive Committee



meeting. A copy is included in this report. They are maintained on the NCCSD website on the Executive Committee page in the Agendas & Minutes section.

The NCCSD Executive Committee met on the following dates in the 2020-21 committee year:

| | | |
|-------------|-------------|------------------------|
| October 15 | February 18 | June 17 |
| November 18 | March 18 | July 15 |
| December 17 | April 15 | August 19 (canceled) |
| January 21 | May 20 | September 16 (planned) |

Meetings packets with agendas, minutes, and documents for reference and consideration are maintained in the Agendas & Minutes section of the Executive Committee page on the NCCSD website. Final and approved minutes for each meeting are included in the respective meeting packet for that meeting.

Significant Records

The records below represent actions taken by NCCSD or the NCCSD Executive Committee during the 2020-21 committee year. These records are maintained on the Executive Committee page of the NCCSD website.

- Supplement to NCCSD position paper on retroactive modifications – August 11, 2020
- Comments to OCSE on Draft Action Transmittal on intergovernmental case processing – September 30, 2020
- Comments to OCSE on incarceration exceptions proposed rulemaking – November 12, 2020
- NCCSD Financial Statement for 2018 from Marcum accounting firm – January 10, 2020 (received February 3, 2021)
- NCCSD Financial Statement for 2019 from Marcum accounting firm – February 3, 2021
- Engagement letter with Haga Kommer accounting firm – February 3, 2021
- Letter of support for S.534 (Tribal Child Support Enforcement Act) addressed to Senator Thune – May 5, 2021

It has been a privilege and a pleasure to serve as the secretary for NCCSD for a second year. My warm thanks are extended to the other officers for their assistance in keeping the operation of NCCSD smooth during a most unusual year: Treasurer Liesa Stockdale, Vice President Michele Cristello, and especially President Jim Fleming.

Respectfully submitted,

Kate Cooper Richardson
NCCSD Secretary



Annual Business Meeting

Tuesday, July 28, 2020
 Wednesday, July 29, 2020

MINUTES

10 AM – 1 PM AST/EDT • 9 AM – 12 PM CDT • 8 AM –11 AM MDT • 7 AM –10 AM MST/PDT
 6 AM – 9 AM AKDT • 4 AM – 7 AM HST • 12 AM – 3 AM (+1 day) Guam

IV-D Director Members & Attendees

| DAY 1 | DAY 2 | STATE/TERRITORY | NAME | ROLE |
|--------------|--------------|-----------------------------|-------------------------|-----------------------|
| ✓ | ✓ | Alabama | Lathesia McClenney | IV-D Director |
| | | Alaska | Carol Beecher | IV-D Director |
| ✓ | ✓ | Arizona | Molly Bright | Interim IV-D Director |
| ✓ | ✓ | Arkansas | Barbara Morris-Williams | Interim IV-D Director |
| ✓ | ✓ | California | David Kilgore | IV-D Director |
| ✓ | ✓ | Colorado | Larry Desbien | IV-D Director |
| ✓ | | Connecticut | John Dillon | IV-D Director |
| ✓ | ✓ | Delaware | Ted Mermigos | IV-D Director |
| ✓ | ✓ | District of Columbia | Sophia Hollis Ticer | Acting IV-D Director |
| ✓ | ✓ | Florida | Ann Coffin | IV-D Director |
| ✓ | | Georgia | Tangler Gray | IV-D Director |
| | | Guam | Andrew Perez | IV-D Director |
| | | Hawaii | Lynette Lau | IV-D Director |
| | | Idaho | Rob Rinard | IV-D Director |
| ✓ | | Illinois | Mary Bartolomucci | Interim IV-D Director |
| ✓ | ✓ | Indiana | Adam Norman | IV-D Director |
| ✓ | ✓ | Iowa | Carol Eaton | IV-D Director |
| ✓ | ✓ | Kansas | Elizabeth Cohn | IV-D Director |
| ✓ | ✓ | Kentucky | Lily Patteson | IV-D Director |
| ✓ | ✓ | Louisiana | Lydia Scales | IV-D Director |
| ✓ | ✓ | Maine | Jerry Joy | IV-D Director |
| ✓ | ✓ | Maryland | Kevin Guistwite | IV-D Director |
| ✓ | ✓ | Massachusetts | Michele Cristello | Vice President |
| ✓ | ✓ | Michigan | Erin Frisch | IV-D Director |
| ✓ | ✓ | Minnesota | Shaneen Moore | IV-D Director |

| DAY 1 | DAY 2 | STATE/TERRITORY | NAME | ROLE |
|-------|-------|-----------------|------------------------|-----------------------|
| ✓ | ✓ | Mississippi | Lyndsy Landry Irwin | IV-D Director |
| ✓ | ✓ | Missouri | John Ginwright | Acting IV-D Director |
| ✓ | ✓ | Montana | Chad Dexter | IV-D Director |
| ✓ | ✓ | Nebraska | Cindy Wiesen | IV-D Director |
| | | Nevada | Cathy Kaplan | IV-D Director |
| ✓ | ✓ | New Hampshire | Karen Hebert | IV-D Director |
| | | New Jersey | Patricia Risch | IV-D Director |
| ✓ | ✓ | New Mexico | Jeremy Toulouse | IV-D Director |
| ✓ | ✓ | New York | Eileen Stack | IV-D Director |
| ✓ | ✓ | North Carolina | Carla West | IV-D Director |
| ✓ | ✓ | North Dakota | Jim Fleming | President |
| | | Ohio | Jeff Aldridge | IV-D Director |
| ✓ | ✓ | Oklahoma | Renee Banks | IV-D Director |
| ✓ | ✓ | Oregon | Kate Cooper Richardson | Secretary |
| | | Pennsylvania | Robert Patrick | IV-D Director |
| ✓ | | Puerto Rico | Stephanie Garcia Vidal | Interim IV-D Director |
| ✓ | ✓ | Rhode Island | Sharon Santilli | IV-D Director |
| ✓ | ✓ | South Carolina | Tim Mose | IV-D Director |
| | ✓ | South Dakota | Gail Stoltenburg | IV-D Director |
| ✓ | ✓ | Tennessee | Robert Duck | IV-D Director |
| ✓ | ✓ | Texas | Ruth Anne Thornton | IV-D Director |
| ✓ | ✓ | Utah | Liesa Stockdale | Treasurer |
| ✓ | ✓ | Vermont | Robin Arnell | IV-D Director |
| | | Virgin Islands | Terrence Joseph | IV-D Director |
| ✓ | ✓ | Virginia | Barbara Lacina | IV-D Director |
| ✓ | ✓ | Washington | Sharon Redmond | IV-D Director |
| ✓ | ✓ | West Virginia | Garrett Jacobs | IV-D Director |
| ✓ | ✓ | Wisconsin | Debra Barnes | IV-D Director |
| ✓ | ✓ | Wyoming | Kristie Arneson | IV-D Director |
| 44 | 41 | | | |

Welcome

- President Jim Fleming called the meeting to order at 9:01 AM Central, July 28, 2020

Roll Call

- Secretary Kate Cooper Richardson called roll by state/territory

- Attendance as noted for Day 1
- Quorum present
- Guest: Kristen Donadee, Chief Deputy Director (CA)

Officers' Reports

- President's Report
 - Jim gave some history and background of NCCSD
 - Congratulations to Elizabeth Cohn (KS), made permanent director in May
 - Reviewed the director tenure record, Nov 2015 average start date
 - Reviewed the written President's Report in meeting packet
 - Year started with ambitious agenda – much will be left undone because of the disruption
 - Hopeful for lemonade from lemons –
 - Highlights are listed in report
 - Senate announced its next Covid-19 response legislation
 - Interesting to see how OCSE and ACF respond to letter
 - Never seen so much activity from directors in decade
 - Sorry for so much email – but tried to share as much as possible
- Secretary's Report
 - Went over written report
- Treasurer's Report
 - Quiet job this year
 - Reviewed written report
 - Extension on this year's taxes to August 15
 - Since there wasn't a conference this year, less activity
 - We were able to get full refunds for 2020 conference cancellation
 - Thanks to committee, grateful for extra set of eyes
 - Balance: \$82,890.90
 - Erin (MI) comment: we need to find good uses for it!

Committee Reports

- Audit Committee – Michele (MA)
 - Provided background on reason for the committee
 - Goal: how best to support directors in process
 - Goal: work with OCSE to get more transparent, consistent process
 - Wanted to be involved in the process
 - OCSE has been working well with committee
 - 2019 DRRs were very fast to complete
- Child Support-Employer Collaboration Workgroup – Jim (ND)
 - OCSE Employer Services team staffs—helpful
 - Great combo of people: employer associations, payroll, large employer reps
 - Hard getting traction to research between meetings due to Covid-19
 - Employers pain point: working in multiple states, other than new hire
 - Only have 1 form—believe we all should do things the same way, e.g., multiple IWOs
 - Their dream isn't possible unless we federalize program
 - National employer database is achievable
 - Discussed CSLN—if there was something like this in the employer space, it would be helpful, and we should look at it
 - Helps to standardize
 - It's a dream, but possible
 - Look at existing VOE form—what does it need?
- Collaborative Analytics – Sharon (WA)

- Final report included in packet; committee dissolving
- Formed in 2017: concept was to share info and predictive analytics model from developed states with others
- Washington shared model with Minnesota as a test run, but didn't end up working well because of difference in inputs
- So changed model to consider shared platform; OCSE developed Alfresco platform
- Jim (ND): This area something for a retired IV-D director to do in the future, if interested
- Finance Committee – Liesa (UT)
 - Covered in Treasurer's Report in packet
- Joint Committee on Public Relations – David (CA)
 - 3rd year of 3-year cycle for committee; he joined mid-stream
 - Written report in packet identifies deliverables
 - Several resources helpful, including responding to Covid-19
 - Want to look again at infographic again in a year
 - Posing the question: renew committee or let it sit?
 - It has been challenging to get momentum—e.g., housing material but can't find right platform, not a lot of resources
 - If want committee to continue, where to focus?
 - Q from Kate (OR): NCSEA and OCSE position? A from David (CA): just wanted to take NCCSD temperature
 - Jim (ND): maybe sit out 6 months, then revive original committee?
 - General support expressed for infographics, helpful
 - Erin (MI) perspective: This is an area where investment now will help in long run, risk of pause will force further behind
 - David (CA): really appreciates requests for specific materials, etc.
 - Various comments:
 - Need very basic, generic message/materials
 - Follow-up on focus, such as human services crisis following this pandemic
 - Consider combining with cost-avoidance message
 - Making clear that child support not a benefit program
 - Infographic approach is positive
 - Framing our messages around what's important to customers right now—helping to focus families on how we can help them with what's important to them now
 - Equity, diversity, inclusion—how do we get an assessment of current customers, are our messages reaching everyone we need to
 - David (CA): happy to continue with the committee
 - Suggestion to add some staff to help support
 - Sentiment to move forward with renewed focus, effort
- Mentoring Committee – Karen (NH)
 - Been in place since 2014
 - Written report plus supplemental materials in packet
 - Monthly call-ins, camaraderie vital to the strength of organization
 - Calls are proven winner
 - The monthly calls were solid base for setting up foundation for pandemic crisis—upped the game by converting to 2x/month
 - Committee focus on creating more developed mentoring structure
 - Thanks expressed to Karen (NH) for taking on role of “de facto group therapist” during pandemic
- Policy & Practice Committee – Eileen (NY) / Carol (IA)
 - 2nd year of committee

- Number of subcommittees
- Medical referral sub – goal to develop white paper for next gen (Liesa (UT) leading) – paused to Covid-19
- Incentives sub goal to pull together library of resources
 - So could react if congress activity
 - Position: risk of losing funding, but needed to be able to respond quickly thoughtfully regarding funding and incentives
 - Massachusetts' team helpful pulling together a resource library
 - Work put on hold pending discussion in pandemic
- Pandemic document to the Congressional committees—helpful resource
- System Modernization & Data Sharing Workgroup – Carla (NC) /Robin (VT)
 - Very active year
 - Met 1 or 2 times per month, even with Covid-19
 - Have asked that there aren't contractors involved anymore for the sake of OCSE
 - Webinars
 - Educational presentations—replatforming/refactoring
 - Contractor presentation
 - Website committee page has all the documents
 - Will schedule a series on how states manage system project stages
 - On each stage, from pre-planning through certification
 - Will be reaching out to different states to share lessons learned on each stage
 - As part of relationship with OCSE, working on development on feasibility study guidelines
 - This committee will be vehicle for director feedback
 - Goal is by end of September
 - Glad that OCSE is asking for input so it fits our needs
 - Data analytics part—two-pronged mission, added this about a year ago
 - OCSE work, especially with Cynthia Longest (contracted with OCSE)
 - UDC webinar: 64 state reps, 28 states represented
 - New webinars planned: income withholding and percentage of collections
 - OCSE creating an Alfresco site as home for this data
 - State point of contact needed
 - In system testing, UAT late July
 - OCSE + IV-D agencies with access only
 - Survey regarding prioritization of future topics
 - Front runners: current support and total collections
 - Cost effectiveness lowest priority
 - Also working on distribution cheat sheet for directors to explain how it all works
 - For IT personnel, leadership, etc.
 - Maybe flow chart, infographic
- Website Committee – Kate (OR)
 - Written report in packet
 - Website Committee develops, maintains both the NCCSD website and listserv.
 - Original focus for this committee year
 - Trouble-shoot some glitches on the website before undertaking more development
 - Collect and populate the website with more materials, both archival and current
 - Identify areas for upgrade and improvement on the website
 - Strategize sustainable maintenance practices
 - Maintain status quo with the listserv

- With onset of the coronavirus pandemic, committee's efforts disrupted
 - Only goals 1, 5 achieved, some partial achievement on goals 2, 3, 4
 - Not held a formal meeting since the outbreak, instead taking care of any necessary actions via email communication
 - Priorities since that time are to maintain the listserv due to especially heavy use and upload pandemic-related resources as quickly as possible.
- Looking forward, committee to pick up its regular cadence of meetings, assess the current status of the website (some upgrades needed), and complete its 2019-20 goals

Bylaws Amendment

- The amendment proposal stems from an Executive Committee discussion after the decision to cancel the conference in North Dakota
- This year we put a hiatus on most activities
- The idea was a “gap year” solution, carrying over the officers and essentially replicating 2020 in the 2021 year
- To do that, need adjustment to the bylaws because of the two-year term for the treasurer
- Proposed amendment in meeting packet
- Ted (DE) moved and Carla (NC) seconded to adopt the bylaws amendment as proposed.
 - No discussion
- Motion carried, no nays

Report of Nominating Committee and Election of Officers

- Three-person committee made up of former NCCSD presidents still in ranks: Erin (MI), Carol (IA), Sharon (RI)
- Nominating committee provides a two-part recommendation—officers and election
- Erin (MI) moved and Lyndsy (MS) seconded to nominate existing officers to serve another year in those roles, plus extending Liesa (UT) as treasurer one year in 2-year term
- No nominations from floor
- Motion carried, no nays
- Carla (NC) moved and Lydia (LA) seconded to move the nominated slate to the ballot for election
- No discussion
- Motion carried, no nays

Meeting recessed at 11:46 AM Central until 9:00 AM Central, July 29, 2020

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*Meeting reconvened at 9:00 AM Central, July 29, 2020*

### Roll Call

- Attendance as noted for Day 2
- Quorum present
- Guests:
  - Former OCSE Commissioner Vicki Turetsky
  - Kristen Donadee, Chief Deputy Director (CA)

### Presentation by Vicki Turetsky on Aspen Institute Project

- Missed working with OCSE colleagues and all the directors
- In awe of all the IV-D directors for “keeping the ship afloat” during these challenging times
- Her involvement in child support now:
  - She originally intended to retire after the administration change
  - Was reeled back in; was still getting frequent technical requests from the Hill, foundations, advocates



- Also worked some with NCCSD, NCSEA,
- Had developed many connections in advocacy network because, since 1996, she's been involved in all the legislation related to child support
- Now has tried to carve out neutral, straightforward role—but lots of pressure to be more of an advocate
- Her personal goal is to serve as information resource, a mitigating, moderating force
- She's seeing an expanded interest in child support reform
- New entrants into the arena; her perspective is that it's a good thing, but not always balanced, and a lot of misunderstandings
- Much of the interest is focused on low-income factors, tied to equity, racial equality
- However, huge knowledge gap about the child support program, outdated info
- E.g., efforts related to driver license suspension—removal of ability to suspend for non-moving violation removal; few advocates know it is federal law for child support
- Please feel free to get in touch and share perspective
  - Still in touch with the Hill on coronavirus response, package in HEROES Act
  - Now involved with the HEALS Act—sitting in Senate
  - The fight will be over state/local government aid
  - Hopes the final legislation will include child support provisions, but probably won't get resolved until very late, which makes it hard to get the elements in
- Aspen Institute
  - Vicki has a contract to draft child support toolkit focused on low-income fathers
  - Thanks to the directors for completing survey last fall
  - Reviewed, researched articles, etc.
  - Aspen is known as popularizing the 2Gen approach – family centered
  - 13 states part of 2Gen network—commitment at some level
  - Often Aspen has recruited Human Services directors as Aspen fellows
  - Part of ethos: call to action through letters to state governors
  - In 2018, held a convening for fatherhood project, wanted to focus on child support
  - Goal to bring family-centered policies into fatherhood efforts
  - Depth of background in child support policy is not broad
  - Good+Foundation (Jerry and Jessica Seinfeld) partnered, influential in fatherhood arena
  - Upside and downsides: opportunity to improve information, showcase evolution of program
  - Audience: state policymakers, governors, commissioners, legislators
  - Aspen Institute will publish 10-page overview paper on child support and 7 fact sheets, starting with paper and first two fact sheets coming out in August for Child Support Awareness Month
  - Expect media attention; Vicki can't give advance copy due to leak potential
  - Basic message
    - Research better way to approach strong families, communities
    - Modernizing programs for innovative app
    - Wholistic approach to families, family-centered
    - Partnership with parents, go beyond collection for program
    - Culture of child support program is changing
    - Recommend promising practices
    - Expansive reach of child support program provides opportunity
    - Should be a part of each state's program
  - Fact sheet topics
    - Debt reduction
    - Family distribution
    - Modification

- Employment and EIC
  - Child support orders
  - Access to justice, contempt
  - Family stabilization
- Fact sheets all set up the same way, straightforward
- Anticipation that governors will send fact sheets to directors with examples and work together to advance policies
- Distribution to media, major national groups, to all the fellows, to governors/commissioners
- She'll get copies to directors, nothing wild and crazy in the recommendations, will be familiar
- Examples attempt to be diverse approaches, geography, "best of class"
- Other 5 fact sheets will be published one or two at a time over next few months
- This effort is a pre-Covid project—hard to retrofit. Hope to create positive energy about what states are already doing
- Hope to do for child support awareness what was done for child welfare awareness
  - Advantage of being under the radar—steer own course
  - Disadvantage—neglected in recognition and resources
- Language choices: uses NCP term, also gendered—lost that battle, too bad perpetuating stereotypes

### Election of regional representatives

- The regions caucused respectively and provided the following representatives to the NCCSD Executive Committee for the 2020-21 year:
  - Region 1 Karen Hebert (NH)
  - Region 2 Eileen Stack (NY)
  - Region 3 Ted Mermigos (DE)
  - Region 4 Lyndsy Landry Irwin (MS)
  - Region 5 Erin Frisch (MI)
  - Region 6 Jeremy Toulouse (NM)
  - Region 7 Cindy Wiesen (NE)
  - Region 8 Chad Dexter (MT)
  - Region 9 David Kilgore (CA)
  - Region 10 Sharon Redmond (WA)

### Unfinished Business

- Audits
  - Not much else to say beyond earlier report
  - Michigan in midst of DRA, OCSE extremely accommodating of due dates, so far okay
  - Mississippi in midst, did include deadline will ask for more time
  - Maine finishing 2018 DRA—line of findings on system certification issues on reliable data, wanted findings removed even though passed
  - Rhode Island said auditor focused on financial lines, will share with committee
  - Concern that Audits Division being briefed by Policy Division and may result in changes to 157 report
  - Committee has 157 future on radar, too
  - Karen (NH): concerning how integrating policy into findings, committee needs specific examples from states
- The Work Number (TWN)
  - Was working on its documents
  - NCCSD signed on to APHSA complaining about rate structure – apparently no response

- Carla: been in several meetings with TWN over the last weeks, combined agency contract
  - Equifax has tripled rates lately, many states cancelling contracts
  - Three or four other companies providing service, growing in this area
  - Medicaid has requirement says that employment verification must be electronic, so may be driving cost
  - North Carolina will be issuing RFP
- California in negotiation with Equifax, says free service will go away—different story
- Louisiana just signed on with Equifax, was hoping to leverage TANF connection
- Oregon plans to combine with its TANF agency
- Database is still the best, though
- Jim (ND) will reply to Equifax to ask about free service
- Share the cost information with each other? Survey?
- California will survey/compile information

## New Business

- Legislative
  - Position paper on pandemic completed
  - House legislation favorable for child support relief
  - Senate legislation stimulus/economic impact payments at same levels plus expanded benefits
    - No child support funding/flexibility
    - How to get provisions back in? Committee staff know of NCCSD desire
    - If states can let their Congressional reps know about these provisions, will help
  - NCSEA paid advocate shares info with NCCSD regularly
  - Senator Cornyn's FFP employment bill to be introduced
- Regulatory
  - Sent follow-up to ACF after meeting. No response, no idea when one expected
  - OCSE is moving forward as if this administration will be around another four years
  - Opened floor for comments?
    - None
- Resilience document, workgroup
  - Document from Deputy Commissioner Linda Boyer related to workgroup in packet
  - Ann (FL) will be NCCSD co-facilitator
    - Document seems very broad, though
    - Hope to scope it to actionable efforts
    - As a group, need input
    - Meeting every two months is far apart, will push on deliverables in between
  - Sharon (WA): was somewhat disappointed that didn't address concerns, no action items—seems more like chit-chat, like regional meeting
  - Jim (ND): concern about impact if lame-duck administration
  - Eileen (NY): may help us shape the direction even for incoming commissioner
  - Chad (MT): encourages jumping in with both feet, and if the ball drops with new commissioner, good example of what we've been talking about
  - Karen (NH): want to show we are engaged, advocating for own concerns
  - Ann (FL) asks for feedback, priorities from directors to help guide and build group
- Operations
  - Seems as if most if not all states are reopening for interstate work
  - Lots of Stafford Act waiver requests being shared on the website
  - Request for waiver of federal self-assessment—don't need a paper trail, may be one or two years potentially
    - Timeframes go into next fiscal year of emergencies

- Distribution issues
- Jeremy (NM): has anyone done projections on unemployment and how it will impact collections?
  - New York created response teams monitoring performance and administrative enforcement
  - Discussion about impact on collections from unemployment
- Lily (KY): With potential new act and stimulus, what will states be doing this time around?
  - Sharon (WA): current approach is very manual, customer-friendly, objection process in place already
  - California using Governor's Executive Order as a catalyst for legislation changes
  - Michigan, Wyoming, Oregon made changes to their distribution for Round 1—plan to keep if Round 2
  - Survey suggested to gauge states' plans going forward
  - Maybe include questions regarding telephonic hearings, electronic filings judicial
  - Action item: Create state survey and distribute—Lily (KY) to work with Jim (ND)
- Committee – Adam (IN) and Lyndsy (MS)
  - Webinars
  - Put out a call for volunteers
  - Maybe not many webinars—a couple? Directors only?

### Closing Remarks

- Jim: Thanks for doing this in new format, not many technical problems
- All: Looking forward to meeting in person in Medora next year!

*Meeting adjourned at 11:31 AM Central, July 29, 2020*

*Minutes respectfully submitted by Kate Cooper Richardson, NCCSD Secretary*



2021 Treasurer's Report  
Liesa Stockdale, Treasurer  
July 19, 2021



### **Bylaws (updated 2013)**

*The Treasurer shall have a review of the Council financial records conducted, and completed by January 15 each year. The Treasurer shall establish an independent member review committee within the NCCSD to sign off on the financial review. The Treasurer shall ensure that all appropriate federal and state income tax forms are filed by February 15 each year, and that all forms and any fees due to state of Incorporation are filed timely. The Treasurer shall be the custodian of the financial records of the Council for the current year. Treasurer shall deposit all funds belonging to the Council in an account, and shall report the current balance and any past financial transactions at each meeting of the Council and Executive Committee.*

#### Article IV, Paragraph E.

*The term of office for all persons elected or appointed shall coincide with the Federal Fiscal Year immediately following the election. An elected Treasurer's term shall be two years.*

#### Article V, Paragraph B.

*The business of the Annual Meeting of the Council shall include ... [a] report of the Treasurer.*

#### Article VIII, Paragraph B.

*The President must prepare a budget of anticipated revenues and expenditures for the annual meeting of the Council no later than January 1st and for such other called meetings of the Council at least one month prior to the event. The President must seek approval of the Executive Committee for the budget, and for any subsequent change to budgeted expenditures exceeding ten percent (10%) in total, before obligating or incurring any related expenses. Actual expenditures must not exceed budgeted expenditures by more than 10%.*

#### Article VIII, Paragraph C.

*Donations in cash or in kind from any private entity shall only be used for the annual meeting of the Council and shall be limited to a value of \$1,500 from each entity per year. The Council or members acting on behalf of the Council will not accept donations for any other meeting or purpose except for other uses approved by the Council.*

#### Article X, Paragraph B.



## Council Members:

The National Council of Child Support Directors operates as a nonprofit trade association under 501(c)(6) of the Internal Revenue Code. NCCSD is incorporated in the Commonwealth of Virginia, and the Virginia IV-D Director serves as NCCSD's registered agent.

During 2021, NCCSD opted not to extend the contract with the accounting firm of Marcum LLP. Instead, NCCSD entered into a new contract with Haga Kommer to conduct the annual review of NCCSD's financial records.

NCCSD's tax return is due on January 15<sup>th</sup> annually. For the 2021 tax return, NCCSD was between contracts with accounting firms on the due date. The Treasurer filed IRS Form 8868 in a timely manner and notified the new firm Haga Kommer of the extension. The Treasurer will monitor to ensure that the tax return is filed prior to August 15, 2021 pursuant to the extension.

NCCSD maintains an account with Wells Fargo, and utilizes PayPal to process payments during conference enrollment. Each month, the Treasurer's Report reconciles the monthly statements from both financial accounts. The report is prepared by the treasurer, reviewed by the Finance Committee members, and approved prior to submitting the report to the NCCSD Executive Committee in the monthly meetings. Attached is the most recent financial statement from for June, 2021, which has been approved by the Finance Committee and was submitted for acceptance by the Executive Board at the July 15, 2021 Executive Board meeting.

To provide an idea of the financial trends for the organization, the actual end-of-year balances for NCCSD for the past five years are presented below:

|            |                                                     |
|------------|-----------------------------------------------------|
| 9/30/2016: | \$76,529.74 (web development and director training) |
| 9/30/2017: | \$72,780.03                                         |
| 9/30/2018: | \$78,287.77                                         |
| 9/30/2019: | \$88,012.20                                         |
| 9/30/2020: | \$84,565.80                                         |

The primary financial activity of NCCSD is the annual conference. Ongoing non-conference expenses include approximately \$2500 for the financial review and \$3000 for the spring dinner, along with expenses for honoraria, corporate registration, and expenses related to maintaining the NCCSD website and domain name.

During FY 2021, the NCCSD annual conference resumed meeting in person after a one-year hiatus due to the COVID-19 pandemic. Final numbers for attendance, sponsorships and costs for the 2021 Medora conference will be calculated and added to this report at a later date.

The following statistics are included for continuity in the records:

|                  | 2017<br>Seattle | 2018<br>Norfolk | 2019<br>Mackinac<br>Island | 2020<br>Virtual<br>(pandemic) | 2021<br>Medora<br>(to date) |
|------------------|-----------------|-----------------|----------------------------|-------------------------------|-----------------------------|
| State Director   | 36              | 35              | 41                         | 44                            | 22                          |
| State Staff      | 7               | 7               | 2                          | N/A                           | 3                           |
| Other            | 1               | 9               | 6                          | N/A                           | 2                           |
| Vendor           | 77              | 76              | 76                         | N/A                           | 75                          |
| OCSE/ACF         | 13              | 26              | 18                         | N/A                           | 0                           |
| Host State       | 6               | 8               | 8                          | N/A                           | 5                           |
| Total Attendance | 140             | 161             | 151                        | N/A                           | 107                         |
| Virtual Only     | N/A             | N/A             | N/A                        | 44                            | 22                          |

2016 – 26 sponsors for \$25,500, net revenue of \$13,398.72

2017 – 28 sponsors for \$29,000, net revenue of \$2,595.01

2018 – 25 sponsors for \$28,900, net revenue calculations not available

2019 – 26 sponsors for \$31,500, net revenue \$22,003.73

2020 – Sponsorships N/A

2021 – 29 sponsors for \$37,500 (to date)

It has been a pleasure to serve as the treasurer for NCCSD this year. I also wish to thank the Finance Committee members for their service in keeping NCCSD on solid financial ground: Michele Cristello, Jim Fleming, Garrett Jacobs, and Sharon Santilli.

Respectfully submitted for approval,

Liesa Stockdale  
NCCSD Treasurer





**NCCSD**

*National Council of  
Child Support Directors*

Committee Annual Reports

2021



**TO:** NCCSD

**FROM:** Michele Cristello, Committee Chair

**DATE:** July 15, 2021

**RE:** Audit Committee Annual Report

**Committee Members**

| Name                     | State or Territory |
|--------------------------|--------------------|
| Adam Norman              | Indiana            |
| Konitra Jack             | Louisiana          |
| Michele Cristello, Chair | Massachusetts      |
| Barbara Delaney          | Montana            |
| Karen Hebert             | New Hampshire      |
| Robert Duck              | Tennessee          |

**Committee Activity**

The vision of the Audit Committee is that all IV-D Directors are supported in their management of the DRAs, there is open communication with OCSE and DRAs are conducted in a consistent, transparent manner in accordance with clearly understood and widely accepted criteria. The Committee will provide support to Directors through information gathering, monitoring of ongoing audit activity across states and disseminating relevant and timely information.

The Committee’s objectives were to solicit information from Directors regarding the DRA process and identify common issues and themes and then provide that information back to Directors for their own use. In addition, the Committee will work with OCSE to develop training and guidance for Directors that clarifies a consistent and well-understood process. After some initial discussions with OCSE about their ongoing initiatives to support Directors in the DRA process, OCSE and the Committee agreed to collaborate to develop training, guidance, and improvements to the process. Last year, the Committee provided a bulleted list of audit related items that the directors see as pertinent to the audit process. This list included a number of different aspects of the

process that were concerning to Directors and areas where improvement was necessary. OCSE reviewed the list and provided the Committee with a response that was a detailed document that addressed each item and described their process. The Committee met with OCSE in December 2020 and discussed the list of pertinent items and OCSE's response and the Committee identified areas where further clarification was needed. OCSE recognizes that strengthening communication is critical particularly bringing new directors in the audit process and answering their questions. OCSE indicated that they were excited to work with the Committee to address questions and provide comprehensive answers that speak to the need of the directors. OCSE is taking this very seriously and want a transparent and open process that is as flexible as possible and supports states with open, two-way communication. The Committee conducted an in-depth review of OCSE's document and met again with OCSE in February 2021 to provide feedback and request further clarification. The Committee and OCSE discussed the areas of Communication/Collaboration, Evidence, Technical Assistance/Knowledge Transfer, Transparency and Consistency and where directors needed more insight into the process. OCSE provided further clarification in May 2021.

In addition, the Committee sent a survey to Directors that included a number of in-depth questions about the DRA process, states' statuses, and Director needs. Thirty-one states responded to the survey. The survey provided a lot of great information and actionable next steps for the Committee. A summary of the survey results was provided to the Directors and to OCSE. The survey results provided valuable information for the Committee's next steps. The Committee agreed to focus on the top three items from the survey as guidance for Directors.

- Start to finish process map of the DRA process: create a map/flowchart of the process that reflects how the Directors want to see the process.
- Knowledge and understanding of what auditors use for guidance in their determinations, including a description of how an error is determined in practice, what auditors use for information and evidence and what they exclude
- OCSE providing and explaining the authority and evidence that supports each error finding.

### **Next Steps**

The Committee is working on a guidance document for Directors. The Mentoring Committee is making recommendations to OCSE for revisions to their 2018 Resource Guide and the intent is to augment it with guidance developed by the Audit Committee. The Committee is also considering holding workshops – perhaps before DRA season and in the middle or nearing the end of DRA session – for Directors to provide training-like information to prepare for the current DRA and provide a question/answer session/team discussion to support the process. Another workshop during the DRA

season could also be beneficial for Directors to ask questions, discuss findings, process, and strategies.

The Committee has also asked for time on the agenda at the NCCSD Annual Business Meeting. Input from Directors is requested to see whether DRAs have improved for states since our Annual Meeting in 2019. We are also requesting input on new issues that have arisen and how the process has been as states have tried to resolve them.

The Audit Committee wants to make sure that we get to a fair, transparent, and consistent process across all states, and we need to gauge where we think we are. We are seeking specific examples that we can then discuss with OCSE.

### **Attachments**

Survey Results

OCSE's Original Response to Committee's List of Pertinent Items

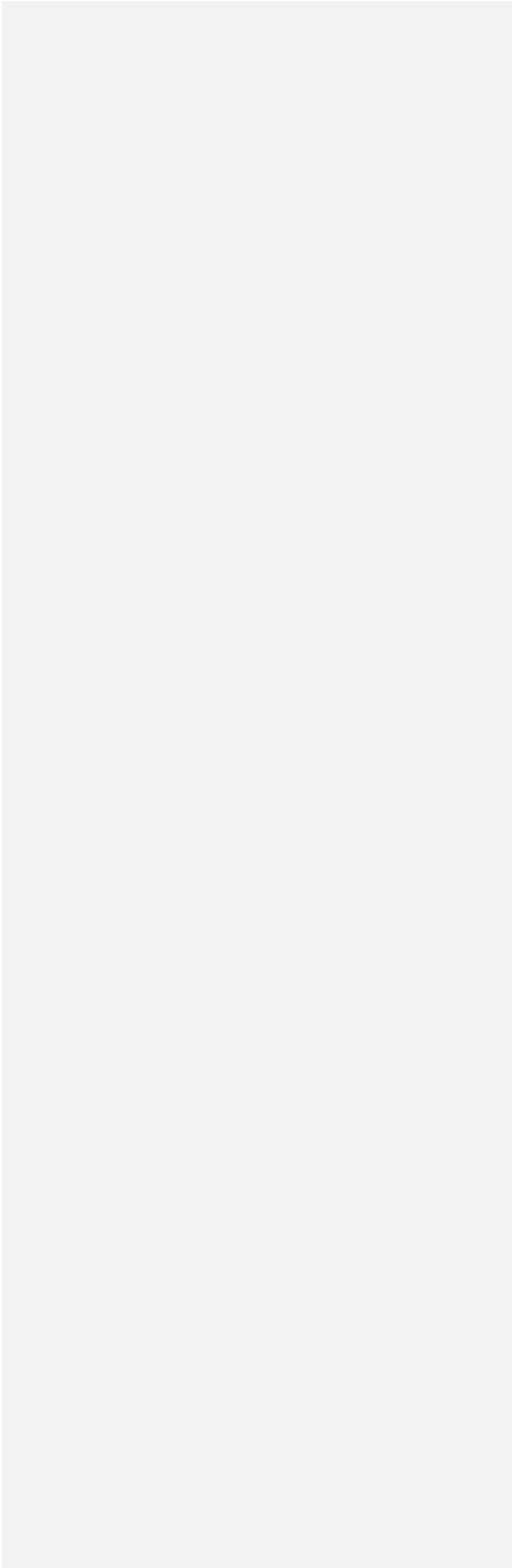
Draft (work-in-progress) Guidance document

Purpose and Intent of this Guide

NCCSD PROVIDES SUPPORT TO STATE DIRECTORS OF THE CHILD SUPPORT PROGRAM IN ALL STATES AND TERRITORIES. THE ORGANIZATION BELIEVES DIRECTORS SHOULD BE ADEQUATELY INFORMED ABOUT THE DATA RELIABILITY AUDIT, AND THAT DIRECTORS SUPPORT A PROCESS THAT IS WELL UNDERSTOOD AND TRANSPARENT, WITH EFFECTIVE COMMUNICATION AND ACCOUNTABILITY ON PART OF BOTH THE STATE AND OCSE.

THIS GUIDE WAS PREPARED BY NCCSD AS A HELPFUL INFORMATIONAL TOOL FOR ALL STATE DIRECTORS REGARDING THE COMPLEX PROCESS AND VARIOUS ROLES AND RESPONSIBILITIES OF THE DATA RELIABILITY AUDIT (OR REVIEW).

DRAFT



## Federal Data Reliability Audits— A Map

THIS SECTION IS INTENDED TO PROVIDE THE AUDIT PROCESS WORKFLOW IN SOME DETAIL FROM ANNUAL DATA REQUIREMENTS RELEASE, VALIDATING AUDIT TRAILS TO EXIT CONFERENCE

The OCSE audit process consists of four phases:

- I. Audit Planning
- II. Audit Engagement
- III. Audit Fieldwork
- IV. Audit Reporting

### Phase I. Audit Planning:

Prior to the beginning of the Data Reliability Audit activities for the current year, OCSE assigns each state either a Data Reliability Audit (DRA) or a Data Reliability Review (DRR) as required per Dear Colleague Letter [\(DCL\) 04-02](#). The OCSE auditors are assigned states to review.

In preparation for every DRA and DRR, the OCSE auditors are required to review the following per OCSE:

- Prior policy, state laws and instruction interpretations unique to each state,
- System changes, and
- Anything that may have been brought to Office of Audit's (OOA) attention by the OCSE Division of Federal Systems (DFS), OCSE Division of Policy and Training (DPT), OCSE Division of Regional Operations (DRO) and OCSE Division of State and Tribal Systems (DSTS) for conducting a DRA or DRR.

The OOA issues the DCL - Data Reliability Audit Requirements FY 20XX, (<https://www.acf.hhs.gov/css/policy-guidance/data-reliability-audit-requirements-fy-2020>) which includes the timeframe for submission of the universe and audit trails to the OCSE Child Support Portal. The DCL includes the following:

- Required Data Submission specifications for the current year
- The available upload date and the due date for submission (usually around January 31<sup>st</sup> for the previous FFY)
- Specifications about the auditors' access to state systems

During this phase, Auditors are required to sign independence certifications forms to ensure auditors do not have any personal or external impairments, including business or personal relationships with the organizations and staff to be audited, which would affect auditor's views or cause others to question auditor's objectivity and independence to perform an impartial audit.

To prepare for the start of the DRA, states should identify state-specific information that would potentially be impactful for the DRA and communicate this information to OCSE by... Examples of this information would be new state laws and/or regulations, what else?

### Phase II. Audit Engagement:

During the audit engagement phase, the state is notified in writing that a DRA or DRR is required for the fiscal year being audited (see attached DRA Engagement Letter). The auditor

**Commented [CMA(1)]:** Ask OCSE how and when this kind of information should be provided and include here.

What are the examples we would want to include here?

This may also be more appropriately put under Phase II.

**Commented [CMA(2)]:** Attach a draft example of the audit engagement letter.

then sends an email to the state umbrella head and IV-D director to schedule an Entrance Conference meeting. The auditor holds a meeting with the IV-D director and staff to discuss the audit objective and scope of the audit. OCSE Division of Regional Operations (DRO) staff is invited to participate in this meeting. In addition, the audit staff works closely with the states and federal/state IT staff to gain access, if necessary, to the state's automated child support enforcement system and signing any confidentiality forms in order to conduct the sampling portion if a DRA is conducted.

### Phase III. Audit Fieldwork:

The main difference between a DRA and a DRR is that the Office of Audit selects sample cases to test the data on the OCSE-157 for Lines 1, 2, 5, 6 or 8, 9, 24, 25, 28, and 29 based on a statistically valid sample in the DRA. The DRR is substantially less in scope than a full DRA and acknowledges states for having demonstrated the ability to produce reliable data and good performance. Audit fieldwork may be conducted onsite or remotely from the audit office for a DRA or DRR.

The auditor will download the universe and audit trails from the OCSE Child Support Portal to validate and select the samples. Audit trails and the states universe are tested to ensure that they meet all requirements including whether they are free of material misstatements resulting from problems that affect the consistency and the logical relationship among related lines. Validation includes several audit processes, which includes:

- A review of the state's OCSE-157 data to identify trends in the reported data;
- Using Microsoft Access and data extracts (universe and audit trails) provided by states, auditors use a consistent process to run queries of the universe and all OCSE-157 lines to provide a preliminary analysis of the reliability of the performance indicator data produced and subsequently reported to OCSE by State IV-D agencies. Although some of the discrepancies may not have a material impact on the audit for that fiscal year, it is shared with the states to ensure full disclosure and provide them with advance knowledge of the reported data. States may be expected to answer questions and/or provide clarification or explanation for the discrepancies;
- If a DRA, a statistically valid sample is performed. The auditors will identify the data elements used by the State IV-D computer system to compile the basic data necessary to produce the performance indicators reported to OCSE;
- The sample selected will be used to evaluate the data reported to OCSE to calculate 4 of the 5 Performance Indicators (PI). The indicators and the lines on the OCSE-157 that will be evaluated are as follows: Paternity Establishment Performance Level (5 & 6, or 8 & 9), Support Order Performance Level (1 & 2), Current Collections Performance Level (24 & 25), Arrears Collections Performance Level (28 & 29);
  - The number of open cases sampled will vary based on the percentage relationship of the total child support universe of cases to the cases open at the end of the reporting period;
  - The sample size will be computed by determining the percentage relationship that exists between the total child support universe and the cases open at the end of the audit period. Multiply the minimum sample size of approximately 150 by the percentage relationship cited in the preceding sentence to arrive at the audit sample size, i.e., (universe equals 150,000, cases open at the end of the audit period = 100,000 then the relationship percentage is 150 percent. Sample = 150 x 1.5 or 225);

- For states that use the Statewide PEP option, separate samples of 50 children will be selected from the audit trails for line 8 and line 9, respectively.
- Data reported on the OCSE-157 are traced and reconciled to the OCSE-157 performance indicator lines audit trails.

The auditors define each of the data elements involved in the calculation of the performance indicators and then compare data defined with the federal requirements. System data definition provides the auditor with the knowledge regarding the data elements involved in the reporting process. This comes by reviewing the system documentation (specifications).

Sample cases are reviewed during a DRA. The auditor must review, analyze, and document each case based on the facts of the case in accordance with the federal reporting instructions. The auditors will verify whether the sample children selected were properly reported on the OCSE-157. States will be expected to answer questions, provide additional documentation and/or provide clarifications on the cases that are being reviewed.

The five performance indicators audited and used to calculate incentive payments are:

- Paternity Establishment Performance Level
- Support Order Establishment Performance Level
- Current Collections Performance Level
- Arrears Collections Performance Level
- Cost-Effectiveness Performance Level

The OOA reviews the state automated child support system and evidence for the first four performance indicator levels above to determine whether a case or a child should have been reported. For the Cost-Effectiveness performance indicator, we ensure that the performance indicator line items are verified to supporting evidence.

The OOA also reviews the adequacy of the physical security, access controls, and supporting documentation received from the state to ensure the reliability and security of the systems processing the data used to calculate the performance indicators.

During the fieldwork phase, the auditor will provide each state with a clear and concise summary of their audit results based on Federal reporting requirements and existing policy guidance. The auditor will also provide a clear understanding of the conclusions for any sample case. These results are articulated throughout the entire audit process as it becomes available to the auditors. Any findings presented to the state are labeled as "potential" to allow states to provide additional documentation for consideration until the final report issuance. During the audit process, if the state requires clarifications of policies or instructions the state is referred to DRO and DFS staff in order to provide technical assistance. OCSE is to provide technical assistance or other services, as applicable, per a state's request or as needed.

There are two kinds of findings – audit findings and management findings. Management findings align with recommended actions that are provided to the states that (1) did not result with a state failing the performance indicator lines or an efficiency rate that is below 95 percent or (2) where data sampling was not completed because the audit was a Data Reliability Review or (3) disclosure of weaknesses with physical security and internal controls. These deficiencies are presented to the state to provide them with an opportunity for correction in order to avoid any adverse impact(s) on their reporting results in the future.

**Commented [CMA(3):** We need OCSE to provide the standards they are basing this on.

**Deleted:**

**Commented [CMA(4):** Provide an example of the Case Findings document used by the auditors.

**Commented [CMA(5):** In a particular timeframe so as to complete before the final report?



At the conclusion of the audit process, an Exit Conference with the state is held. DRO management and non-management staff are invited to participate in the exit conference. The state is briefed along with DRO and provided with a full list of errors and results of the audit. Additional technical assistance is available to the state from the DRO once the actual results of the audit are presented. The state can ask additional questions and provide any additional information for the auditor to review that may have an impact on the potential findings. At this stage of the audit and until the issuance of the final report, states still have an opportunity to provide additional competent, reliable and sufficient evidence in support of any findings.

The auditor will request a management representation letter from the state that asserts the following (see attached example):

- Performance indicator data was prepared in accordance with instructions issued by OCSE;
- Management made available and disclosed all relevant documentation;
- There were no known omissions, deficiencies, or errors affecting the performance data submitted, or the occurrence of any material events subsequent to submission that would require disclosure;
- The state must confirm that they have made all records and supporting documentation available and have not knowingly withheld information or data relevant to the audit purpose.

**Commented [CMA(6):** Attached sample management representation letter

**Phase IV. Audit Reporting:**

During the audit reporting phase, the OCSE auditors ensure the draft and final report are supported by sufficient, appropriate evidence with key facts, figures, and findings being traceable to the audit evidence and in compliance with federal reporting requirements.

The independent audit office assigned to review the report will verify that all working papers, or series of working papers, supporting statements, and memorandums to management have been completed, signed and dated, and reviewed by the senior auditor. In addition, a secondary independent review will ensure all error cases are properly documented with the condition, cause, effect, conclusion and federal reporting and policy existing guidance.

OCSE management audit staff receives the draft/final report after the independent review for submission to the state. If a draft report is required to be issued, the state has the opportunity to review and respond to the draft report, typically within 2 weeks. A state can request an extension for their response submission. Any response will be included in the final report to the state. The reports are disseminated to the IV-D state grantees, the OCSE Commissioner, OCSE Deputy Commissioner, and internal OCSE Division staff (see attached sample report).

**Commented [CMA(7):** Is the independent audit office within OCSE? Is the senior auditor within OCSE? Who is conducting the secondary independent review? When is it done? Prior to communicating the potential finding to the state or after? Once a finding is disputed, additional secondary review?

**Commented [CMA(8):** Attach sample report

**Commented [CMA(9):** I believe that the DRA stops with the final report meaning there is no other “dispute resolution” that a state can take advantage of. Is that right?

## Auditors' Practices

THIS SECTION IS INTENDED TO PROVIDE SOME UNDERSTANDING TO WHAT AUDITORS USE FOR GUIDANCE, HOW ERROR FINDINGS ARE DETERMINED, WHAT AUDITORS USE FOR INFORMATION AND EVIDENCE, AND AUDIT STANDARDS. **NOTE: THE PRACTICES DESCRIBED BELOW ARE BASED ON INFORMATION PROVIDED BY OCSE.**

The OOA uses federal reporting requirements, existing policy guidance, and GAO standards in conducting the Data Reliability Audits.

### Federal Reporting Requirements and Existing Policy Guidance

Internal OCSE Divisions create, establish, and provide technical guidance of the federal reporting requirements and existing policy guidance. The OOA adheres to the federal policy and reporting instructions as defined by these OCSE internal Divisions. The OCSE-157 is developed to capture activities conducted by states operating a child support enforcement program to ensure that they are in compliance with title IV, part D of the Social Security Act, Child Support Performance and Incentive Act of 1988 (CSPIA), and the federal regulations that govern the program. The OCSE-157 federal reporting instructions are not written to be all-inclusive. They are written to capture a snap-shot of all required activities governed by laws for states operating a child support enforcement program. In addition, there is existing policy guidance that clarifies additional reporting requirements.

### Government Accounting Office Standards

In accordance with Government Auditing Standards, auditors must test the evidence provided by the auditee as it pertains to sufficiency, competency and relevancy. The evidence must be sufficient. The evidence is sufficient, if enough evidence exists to persuade a knowledgeable person of the validity of the findings. These standards also address competency. In terms of competency, the evidence must be valid, reliable and consistent with fact. In assessing competence, the auditors must consider such factors as whether the evidence is accurate, authoritative and authentic. The standards also address relevancy. This means that the evidence must have a logical relationship with an importance to the issue being addressed.

### Audit Practices

The Data Reliability Audits are conducted using evidence and a review of activities performed in the state's system (manual or automated). The audit process entails a detailed analysis and review to obtain a reasonable assurance that the system used by the state's IV-D program to compile and report performance measurement data is reliable and the data generated by that system is accurate and complete. This also incorporates an analysis and review for compliance with all federal reporting instructions, regulations, and existing policy guidance.

The OOA must consider all evidence as a whole and apply that to the objective for the specific reporting line that is measured. The audit process does not concentrate on one piece of evidence to determine whether a case should or should not be reported on any given performance indicator line. Instead, the audit process requires a review of multiple pieces of evidence that support compliance with federal reporting instructions and existing policy guidance. GAO standards are utilized by auditors to perform and document an overall assessment of the collective evidence used to support findings and conclusions, including the results of any specific assessments performed to conclude on the validity and reliability of specific evidence. When assessing the overall sufficiency and appropriateness of evidence,

**Commented [CMA(10)]:** I added this line because although we may feel that OCSE doesn't always follow these, the goal of this is to provide what the practices are stated to be.

**Commented [CMA(11)]:** I thought that OCSE had a "Guide for Auditing Data Reliability" – if so, we should attach a copy for the directors. Anything else should also be provided to states.

**Commented [CMA(12)]:** It would be helpful to include more details about how an error is determined and what information and/or evidence is included or excluded when provided by the state. We've asked OCSE for more information but hadn't gotten anything back yet. If we get anything else, we can include it here.

auditors evaluate the expected significance of evidence to the audit objectives, findings, and conclusions; available corroborating evidence; and the level of audit risk. If auditors conclude that evidence is not sufficient or appropriate, they will not use such evidence as support for findings and conclusions. Having a large volume of evidence does not compensate for a lack of relevance, validity, or reliability. The evidence must be consistent with fact in support of the objective or federal reporting requirements and existing policy guidance for the specific line being measured and reported.

**Commented [CMA(13)]:** I would like to include language that indicates that the auditors must explain their reasoning for not accepting – in Adam’s words “show their work”. We need to get OCSE to agree to that.

When evaluating and reviewing the states data for reporting, discretion is not applied during the audit process. In instances where the federal reporting requirements are ambiguous, the OOA immediately seeks clarification from OCSE Internal Divisions and if the OOA is informed that the regulations are ambiguous, those cases reported by the auditee do not result in error findings.

The audit process has been designed to recognize and implement flexibilities to consider that states will have different automated systems with unique parameters, unique state laws and will utilize and interact with a variety of third party vendors to establish and document paternity acknowledgments, born out of wedlock, support orders, etc. The audit process has also been designed to recognize and implement flexibilities where an interstate case is in the sample. The audit process accepts complete Transmittal 1 forms as sufficient evidence if no conflicting documentation is viewed. For those instances where the Transmittal 1 form is incomplete, states are afforded opportunities during the audit process to contact other states to obtain competent, reliable and sufficient documentation in support of data reported.

**Commented [CMA(14)]:** We need clarification from OCSE – is there an ability to correct after the fact? Additional documentation must exist but can’t be created? Is interstate an exception here?

DRAFT

## Roles

THIS SECTION DESCRIBES ROLES OF VARIOUS FEDERAL POSITIONS IN THE FEDERAL AUDIT OR REVIEW OF DATA RELIABILITY. ITS PURPOSE IS TO PROVIDE POINTS OF CONTACT FOR ON-THE-SPOT GUIDANCE AND POST-REPORT GUIDANCE TO HELP UNDERSTAND AN AUDITORS' PERSPECTIVE THAT WOULD ASSIST STATES TO DEVELOP EFFECTIVE CORRECTIVE ACTION.

OOA staff collaborate closely with the internal OCSE Divisions that create, establish, and provide technical assistance of the federal reporting requirements and existing policy guidance. Below is a high-level overview of the roles and responsibilities of the internal OCSE Divisions.

### Office of Audit:

Director: Mona L Ferrell – [Mona.Ferrell@acf.hhs.gov](mailto:Mona.Ferrell@acf.hhs.gov)

Primary services:

- Perform Data Reliability Audits and review for all 54 states and territories annually to ensure that states receive their fair share of incentive dollars.
- Conduct limited cost audits and special reviews to determine whether federal and other funds made available to carry out the child support program are being appropriately expended, and properly and fully accounted.
  - Assist states to improve program performance.
- Perform other audits as deemed necessary by the HHS Secretary or designee.

### Division of Regional Operations (DRO):

Director: Melissa Johnson – [Melissa.Johnson@acf.hhs.gov](mailto:Melissa.Johnson@acf.hhs.gov)

Primary services:

- Provide technical assistance to 54 states/territories, and tribal child support programs.
- Conduct site visits and training.
- Review state/territory/tribal program plans.
- Conduct outreach with community-based organizations.
- Collaborate on initiatives across other human services programs.

### Division of Policy and Training (DPT):

Director: Yvette Riddick – [Yvette.Riddick@acf.hhs.gov](mailto:Yvette.Riddick@acf.hhs.gov)

Primary services:

- Propose and implement national policy, and provide policy guidance and interpretations.
- Provide national direction and leadership regarding child support program training.
- Facilitate conference coordination as the point of contact for national and state child support organizations (NCSEA, NTCSA, NCCSD, ERICSA, and WICSEC).
- Oversee US Central Authority activities.

### Division of Federal Systems (DFS):

Director: Veronica Ragland – [Veronica.Ragland@acf.hhs.gov](mailto:Veronica.Ragland@acf.hhs.gov)

Primary services:

- Manage and operate the Federal Parent Locator Service.
- Provide guidance, analysis, technical assistance, and oversight to state and tribal child support programs regarding performance measurement; statistical, policy and program analysis; synthesis and dissemination of data sets to inform the program; and application of emerging technologies, such as business intelligence and data analytics to improve and enhance the effectiveness of programs and service delivery.
- Responsible for collection, compilation, analysis, and dissemination of state and tribal data to Congress and the public.
- Responsible for promoting public access and understanding of data, managing academic and research projects, and providing support for researchers.

#### **Division of State and Tribal Systems (DSTS)**

Director: Raghavan Varadachari – [Raghavan.Varadachari@acf.hhs.gov](mailto:Raghavan.Varadachari@acf.hhs.gov)

Primary services:

- Review, analyze, and approves/disapproves State and Tribal requests for Federal Financial Participation for automated systems development and operations activities.
- Provide assistance to state and tribal programs in developing or modifying automation plans to conform to federal requirements.
- Monitor approved state and tribal systems development activities; certify statewide and tribal automated systems; conduct periodic reviews to assure compliance with regulatory requirements applicable to state and tribal automated systems supported by Federal Financial Participation.
- Provide guidance on functional requirements for automated information systems

### Strategy and best practices for directors

THIS SECTION IS INTENDED TO PROVIDE DIRECTORS WITH SUGGESTED STRATEGIES AND BEST PRACTICES FOR WORKING WITH OCSE AND FEDERAL AUDITORS DURING THE DATA RELIABILITY AUDIT OR REVIEW. COMMON LESSONS LEARNED ARE CAPTURED HERE BASED ON STATES' EXPERIENCES WITH EXAMPLES.

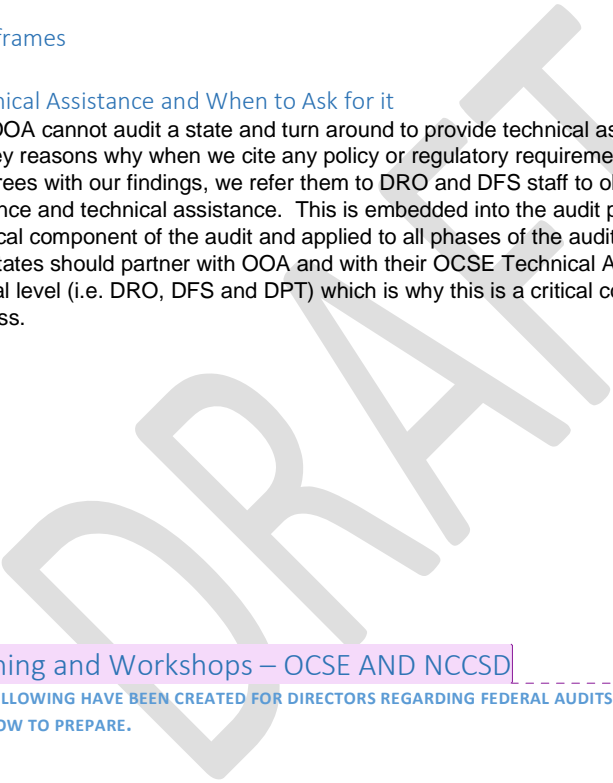
How to Prepare

Communication

Timeframes

#### Technical Assistance and When to Ask for it

The OOA cannot audit a state and turn around to provide technical assistance. This is one of the key reasons why when we cite any policy or regulatory requirements and if the state disagrees with our findings, we refer them to DRO and DFS staff to obtain the necessary guidance and technical assistance. This is embedded into the audit process. Communication is a critical component of the audit and applied to all phases of the audit process. OOA agrees that states should partner with OOA and with their OCSE Technical Assistance partners at the federal level (i.e. DRO, DFS and DPT) which is why this is a critical component of the audit process.



#### Training and Workshops – OCSE AND NCCSD

THE FOLLOWING HAVE BEEN CREATED FOR DIRECTORS REGARDING FEDERAL AUDITS WITH FOCUS ON THE ABOVE AND HOW TO PREPARE.

**Commented [CMA(15):** We can also add “Other Useful Information” – not sure what that is yet but we can discuss.

## NCCSD Audit Committee

### List of Pertinent DRA items

State Directors are seeking a stronger partnership to the process and requirements of the Data Reliability Audit (DRA). For something that carries such significant impacts on state programs and their success to serve families, NCCSD regards this partnership and the outcomes of the DRA as a very high priority. The following list was requested by Deputy Commissioner Linda Boyer, which addresses the collective concerns, questions and asks of State Directors. We are pleased to provide this and hope it will lead to positive outcomes for all states regarding the DRA. We look forward to taking the next steps with OCSE on this.

1. [Directors need a map of the DRA and DRR processes, from annual data requirements release, validating audit trails to exit conference, with timeframes.](#)

### **OCSE's Response to Question 1**

The OCSE audit process consists of four phases, and we'll describe a high level overview of the four phases:

- I. Audit Planning
- II. Audit Engagement
- III. Audit Fieldwork
- IV. Audit Reporting

#### **Phase I. Audit Planning**

This phase includes the state assignments of the Data Reliability Audit (DRA). It also includes the state assignments of a Data Reliability Review (DRR) as required per Dear Colleague Letter [\(DCL\) 04-02](#). At the start of every audit engagement, the auditors are assigned states to review and are required to look back at prior policy, state laws and instruction interpretations unique to each state, system changes, and anything that may have been brought to Office of Audit's attention by the OCSE Division of Federal Systems (DFS), OCSE Division of Policy and Training (DPT), OCSE Division of Regional Operations (DRO) and OCSE Division of State and Tribal Systems (DSTS) for conducting a DRA or DRR. It is imperative to the audit process that Office of Audit collaborates with these internal OCSE program staff to ensure accurate audit results to our state partners.

The Office of Audit also works closely with DFS and DPT for issuance of Audit's DCL - Data Reliability Audit Requirements FY 20XX, which includes the timeframe for submission of the universe and audit trails to the OCSE Child Support Portal. No later than August of each year, the Office of Audit works closely with DF S and OCSE Child Support Portal (Portal) staff on any modifications that are required to audit's application on the Portal in order to provide states with a timeline of the Portal's upload availability for states to upload their universe and audit trails. DFS provides the available upload date and this is included in Audit's DCL. During this phase, Auditors are required to sign independence certifications forms to ensure auditors do not have any personal or external impairments, including business or personal relationships with the

organizations and staff to be audited, which would affect auditor's views or cause others to question auditor's objectivity and independence to perform an impartial audit. In addition, travel budgets are established.

Communication is a critical component of the audit process and applies to all phases of the audit process. The Office of Audit walks a fine line of auditing states while trying to respect the roles and responsibilities of our internal partners. The Office of Audit cannot audit a state and turn around to provide technical assistance. This is one of the key reasons why when auditors cite any policy or regulatory requirements and the state disagrees with our findings, we refer them to DRO and DFS staff to obtain the necessary guidance and technical assistance. This is embedded into the audit process. The Office of Audit work closely behind the scenes with the DFS and DRO staff to ensure that the auditors are reviewing state data in compliance with federal reporting requirements. The audit process further includes an open door policy that allows state partner's direct access to Office of Audit management staff to ensure all audits are consistently conducted and uniform treatment is applied. We respect the technical guidance and expertise that DRO and DFS provide to the states. The audit process also includes collaboration with DPT staff and the HHS Office of General Counsel (OGC), if there are areas that are not clearly defined within the federal requirements or legal advice or interpretation is required. We work closely with DPT, DRO, and DFS staff for guidance.

The audit process also includes bringing to the state's attention:

- any issues identified that have an adverse impact on the states' reporting data
- any issues that are not material during the audited period but may result with an adverse impact if not addressed in the future;

This communication process is implemented through all phases in the audit process. Therefore, at the time of the exit briefing, it is a recap of what has been shared during the entire audit.

Although the audit process included sharing all information identified, we recognized that improvement was required with doing a better job of presenting errors to the state. To address the concerns of the child support community, workgroups were created; training and GAO guidance was reinforced to ensure uniformity and transparency in communicating results to the states. The audit process also was modified to strengthen collaborative efforts with our Federal internal partners, i.e. DRO, DFS and DPT by not only including management but also the inclusion of non-management DRO, DFS and DPT staff to the entrance conferences, keeping them abreast of the final error lists, working with the staff if state's request technical assistance during the audit process and inclusion during the exit briefings. Also, the Office of Audit allows as much flexibility as possible during the audit process to allow states to provide additional documentation for consideration until the final report issuance. Our mission is to ensure we collaborate effectively; support states and the final reports support accurate results.



## **Phase II. Audit Engagement**

During the audit engagement phase, the state is notified in writing that a DRA or DRR is required for the fiscal year being audited. The auditor sends an email to the state umbrella head and IV-D director to schedule a meeting. The auditor holds a meeting with the IV-D director and staff to discuss the audit objective and scope of the audit. DRO staff is invited to participate in this meeting. In addition, the audit staff works closely with the states and federal/state IT staff to gain access, if necessary, to the state's automated child support enforcement system and signing any confidentiality forms in order to conduct the sampling portion if a DRA is conducted.

## **Phase III. Audit Fieldwork**

The main difference between a DRA and a DRR is that the Office of Audit selects sample cases to test the data on the OCSE-157 for Lines 1, 2, 5, 6 or 8, 9, 24, 25, 28, and 29 based on a statistically valid sample in the DRA. The DRR is substantially less in scope than a full DRA and acknowledges states for having demonstrated the ability to produce reliable data and good performance. Audit fieldwork may be conducted onsite or remotely from the audit office for a DRA or DRR.

The auditor will download the universe and audit trails from the OCSE Child Support Portal to validate and select the samples. Audit trails and the states universe are tested to ensure that they meet all requirements including whether they are free of material misstatements resulting from problems that affect the consistency and the logical relationship among related lines. Validation includes several audit processes, which includes:

- A review of the state's OCSE-157 data to identify trends in the reported data;
- Using Microsoft Access and data extracts (universe and audit trails) provided by states, auditors use a consistent process to run queries of the universe and all OCSE-157 lines to provide a preliminary analysis of the reliability of the performance indicator data produced and subsequently reported to OCSE by State IV-D agencies. Although some of the discrepancies may not have a material impact on the audit for that fiscal year, it is shared with the states to ensure full disclosure and provide them with advance knowledge of the reported data;
- If a DRA, a statistically valid sample is performed. The auditors will identify the data elements used by the State IV-D computer system to compile the basic data necessary to produce the performance indicators reported to OCSE;
- The sample selected will be used to evaluate the data reported to OCSE to calculate 4 of the 5 Performance Indicators (PI). The indicators and the lines on the OCSE-157 that will be evaluated are as follows: Paternity Establishment Performance Level (5 & 6, or 8 & 9), Support Order Performance Level (1 & 2), Current Collections Performance Level (24 & 25), Arrears Collections Performance Level (28 & 29);
  - The number of open cases sampled will vary based on the percentage relationship of the total child support universe of cases to the cases open at the end of the reporting period;

- The sample size will be computed by determining the percentage relationship that exists between the total child support universe and the cases open at the end of the audit period. Multiply the minimum sample size of approximately 150 by the percentage relationship cited in the preceding sentence to arrive at the audit sample size, i.e., (universe equals 150,000, cases open at the end of the audit period = 100,000 then the relationship percentage is 150 percent. Sample = 150 x 1.5 or 225);
- For states that use the Statewide PEP option, separate samples of 50 children will be selected from the audit trails for line 8 and line 9, respectively.
- Data reported on the OCSE-157 are traced and reconciled to the OCSE-157 performance indicator lines audit trails.

The auditors define each of the data elements involved in the calculation of the performance indicators and then compare data defined with the federal requirements. System data definition provides the auditor with the knowledge regarding the data elements involved in the reporting process. This comes by reviewing the system documentation (specifications).

Sample cases are reviewed during a DRA. The auditor must review, analyze, and document each case based on the facts of the case in accordance with the federal reporting instructions. The auditors will verify whether the sample children selected were properly reported on the OCSE-157.

The five performance indicators audited and used to calculate incentive payments are:

- Paternity Establishment Performance Level
- Support Order Establishment Performance Level
- Current Collections Performance Level
- Arrears Collections Performance Level
- Cost-Effectiveness Performance Level

We review the state automated child support system and evidence for the first four performance indicator levels above to determine whether a case or a child should have been reported. For the Cost-Effectiveness performance indicator, we ensure that the performance indicator line items are verified to supporting evidence.

We also review the adequacy of the physical security, access controls, and supporting documentation received from the state to ensure the reliability and security of the systems processing the data used to calculate the performance indicators.

The Data Reliability Audits are consistently conducted using evidence and a review of activities performed in the state's system (manual or automated) as defined by Federal requirements and existing policy guidance. These audits are also conducted based on Government Auditing Standards. In these standards, auditors must test the evidence provided by the auditee as it

pertains to sufficiency, competency and relevancy. The evidence must be sufficient. The evidence is sufficient, if enough evidence exist to persuade a knowledgeable person of the validity of the findings. These standards also address competency. In terms of competency, the evidence must be valid, reliable and consistent with fact. In assessing competence, the auditors must consider such factors as whether the evidence is accurate, authoritative and authentic. The standards also address relevancy. This means that the evidence must have a logical relationship with an importance to the issue being addressed.

For OCSE auditors, we must thoroughly test the evidence in connection with compliance to federal reporting instructions and existing policy guidance. The audit process entails a detailed analysis and review to obtain a reasonable assurance that the system used by the state's IV-D program to compile and report performance measurement data is reliable and the data generated by that system is accurate and complete. The OCSE-157 federal reporting instructions are not written to be all-inclusive. They are written to capture a snap-shot of all required activities governed by those laws for states operating a child support enforcement program. The audit process does not concentrate on one piece of evidence to determine whether a case should or should not be reported on any given performance indicator line. Instead, the audit process requires a review of multiple pieces of evidence that support compliance with Federal reporting instructions and existing policy requirements.

Although the audit process has a timeframe for the upload of the universe and audit trails, the audit process has been designed to recognize and implement flexibilities to consider that although state systems are functionally certified, OCSE allow states to design their automated systems with unique parameters; state laws are unique but are considered for reporting data; all states do not utilize the same third party vendors such as Vital Registry, Hospitals, Universities and the Courts to establish and document paternity acknowledgments, born out of wedlock, support orders, etc. and their interactions with such vendors are different. These are some of the key factors why the Office of Audit does not implement specific timeframes to states and allow multiple opportunities for states to provide competent, reliable and sufficient evidence that is enough to determine that the cases and/or dollar amounts reported are in compliance with federal requirements. In instances where the sample size selection is an interstate case, the audit process accepts complete Transmittal 1 forms as sufficient evidence if no conflicting documentation is viewed. For those instances where the Transmittal 1 form is incomplete, states are afforded opportunities during the audit process to contact other states to obtain competent, reliable and sufficient documentation in support of data reported.

The auditor will request a management representation letter from the state that asserts the following:

- Performance indicator data was prepared in accordance with instructions issued by OCSE;
- Management made available and disclosed all relevant documentation;

- There were no known omissions, deficiencies, or errors affecting the performance data submitted, or the occurrence of any material events subsequent to submission that would require disclosure;
- The state must confirm that they have made all records and supporting documentation available and have not knowingly withheld information or data relevant to the audit purpose.

During the fieldwork phase, the auditor will provide each state with a summary of their audit results. As previously indicated in the planning phase above, communication is a critical component of the audit process and we have taken steps to strengthen communication with the states, and develop stronger partnerships with our internal state partners and external grantees. These results are articulated throughout the entire audit process as it becomes available to the auditors. Any findings presented to our state partners are labeled as “potential.” The word “potential” is used for a reason because, the Office of Audit allows as much flexibility as possible during the audit process to allow states to provide additional documentation for consideration until the final report issuance. During the audit process, if the state requires clarifications of policies or instructions we refer them back to DRO and DFS staff in order to provide technical assistance. There are times when HHS OGC’s involvement is needed, and we work with them through the appropriate OCSE federal divisions (DPT, DFS, and DRO) in order to resolve any issues.

During the fieldwork phase in the audit process, the audit process includes an exit briefing to the state. As indicated previously, communication is essential and at the time of the exit, states have been briefed throughout the audit of any issues, findings, and recommendations. DRO management and non-management staff are invited to participate in the exit conference. In addition, and depending on the circumstances, technical assistance has been provided to states during the fieldwork phase because a state has requested technical guidance states have requested help from DRO or DFS. The state is briefed along with DRO and provided with a full list of errors and results of the audit. This provides DRO with another opportunity to provide technical assistance to the states and hear actual results of the audit from the auditors. Although the auditors have worked closely with the state during the audit process, the state can ask additional questions and provide any additional information for the auditor to review that may have an impact on the potential findings. At this stage of the audit, states still have an opportunity to provide additional competent, reliable and sufficient evidence in support of any findings. They have until issuance of the final report to provide supporting documentation.

#### **Phase IV. Audit Reporting**

During the audit reporting phase, the auditors ensure the draft and final report are supported by sufficient, appropriate evidence with key facts, figures, and findings being traceable to the audit evidence and in compliance with federal reporting requirements.

The independent audit office assigned to review the report will verify that all working papers, or series of working papers, supporting statements, and memorandums to management have been

completed, signed and dated, and reviewed by the senior auditor. In addition, a secondary independent review will ensure all error cases are properly documented with the condition, cause, effect, conclusion and federal reporting and policy existing guidance.

Management audit staff receives the draft/final report after the independent review for submission to the state. If a draft report is required to be issued, the state has the opportunity to review and respond to the draft report, “typically” within 2 weeks. The word “typically” is used because there are times when a state request extensions for their response submission. Any response will be included in the final report to the state. The reports are disseminated to the IV-D state grantees, the Commissioner, Deputy Commissioner, and internal OCSE Division staff.

2. Directors need definitions of roles of all parties who are or may be involved; Directors need this to include points of contact for on-the-spot guidance and post-report guidance to help understand an Auditors’ perspective that would assist States to develop effective corrective action. Until recently, Auditors had always given insight and legitimately useful information that greatly benefits States in development of effective corrective action. No information has been offered to explain why this no longer provided.

### **OCSE’s response to Question 2**

As indicated above in the response for question 1, it is imperative to the accuracy and integrity of the audit process that the audit staff collaborate closely with the internal OCSE Divisions that create, establish, and provide technical assistance of the federal reporting requirements and existing policy guidance. The audit process provides states with useful information in support of how a state’s data is being reported by auditing the data and providing the results. Here are a few items in support that the audit process provides insight and useful information that benefits states in their development of being effective and efficient to the child support program:

- Strengthened communication verbally and in writing of the findings in compliance with the federal reporting requirements and existing policy guidance;
- Inclusion of OCSE staff by working closely with the DRO Regional Program Manager, front-line specialist; and DFS staff to provide technical assistance;
- When clarifications or interpretations are requested, grantees are referred to the appropriate OCSE division to provide technical assistance;
- Issues identified that may have an adverse impact are immediately presented to the state;
- Issues that are not material during the audited period but may result with an adverse impact if not addressed in the future are presented to the states attention;
- Where the federal reporting requirements are ambiguous, we immediately seek clarifications internally, from the divisions that create and establish policies and reporting instructions. In some cases, audit was informed that the regulations were ambiguous and those cases did not result in error findings.

The bullets listed above are only a few internal processes that the Office of Audit uses to assist states in the development of their corrective action process. The Office of Audit has received positive feedback on the collaborative efforts and internal process. During the four phases, a map was provided as requested in question 1. It included the various roles that each OCSE Division plays to ensure consistency and uniformity of accurate results to our grantees. Below is a high-level overview of the roles and responsibilities.

**Office of Audit:**

Director: Mona L Ferrell – [Mona.Ferrell@acf.hhs.gov](mailto:Mona.Ferrell@acf.hhs.gov)

Primary services:

- Perform Data Reliability Audits and review for all 54 states and territories annually to ensure that states receive their fair share of incentive dollars.
- Conduct limited cost audits and special reviews to determine whether federal and other funds made available to carry out the child support program are being appropriately expended, and properly and fully accounted.
  - Assist states to improve program performance.
- Perform other audits as deemed necessary by the HHS Secretary or designee.

**Division of Regional Operations (DRO):**

Director: Melissa Johnson – [Melissa.Johnson@acf.hhs.gov](mailto:Melissa.Johnson@acf.hhs.gov)

Primary services:

- Provide technical assistance to 54 states/territories, and tribal child support programs.
- Conduct site visits and training.
- Review state/territory/tribal program plans.
- Conduct outreach with community-based organizations.
- Collaborate on initiatives across other human services programs.

**Division of Policy and Training (DPT):**

Director: Yvette Riddick – [Yvette.Riddick@acf.hhs.gov](mailto:Yvette.Riddick@acf.hhs.gov)

Primary services:

- Propose and implement national policy, and provide policy guidance and interpretations.
- Provide national direction and leadership regarding child support program training.
- Facilitate conference coordination as the point of contact for national and state child support organizations (NCSEA, NTCSA, NCCSD, ERICSA, and WICSEC).
- Oversee US Central Authority activities.

**Division of Federal Systems (DFS):**

Director: Veronica Ragland – [Veronica.Ragland@acf.hhs.gov](mailto:Veronica.Ragland@acf.hhs.gov)

Primary services:

- Manage and operate the Federal Parent Locator Service.
- Provide guidance, analysis, technical assistance, and oversight to state and tribal child support programs regarding performance measurement; statistical, policy and program analysis; synthesis and dissemination of data sets to inform the program; and application of emerging technologies, such as business intelligence and data analytics to improve and enhance the effectiveness of programs and service delivery.
- Responsible for collection, compilation, analysis, and dissemination of state and tribal data to Congress and the public.
- Responsible for promoting public access and understanding of data, managing academic and research projects, and providing support for researchers.

**Division of State and Tribal Systems (DSTS)**

Director: Raghavan Varadachari – [Raghavan.Varadachari@acf.hhs.gov](mailto:Raghavan.Varadachari@acf.hhs.gov)

Primary services:

- Review, analyze, and approves/disapproves State and Tribal requests for Federal Financial Participation for automated systems development and operations activities.
  - Provide assistance to state and tribal programs in developing or modifying automation plans to conform to federal requirements.
  - Monitor approved state and tribal systems development activities; certify statewide and tribal automated systems; conduct periodic reviews to assure compliance with regulatory requirements applicable to state and tribal automated systems supported by Federal Financial Participation.
  - Provide guidance on functional requirements for automated information systems.
3. [Directors need to know and understand what Auditors use for guidance, including a description of how an error is determined in practice, i.e., what do Auditors use for information and evidence and what do they exclude? Is the Office of Audit using universal audit practice standards? Auditors appear to have much discretion, as evident by numerous states experiencing error findings in processes that haven't changed in more than a decade and that have survived numerous audits with no respective findings.](#)

**OCSE's response to Question 3**

The Office of Audit uses Federal reporting requirements, existing policy guidance, and GAO standards. It is imperative to the accuracy and integrity of the audit process that the audit staff



collaborate closely with internal Divisions that create, establish, and provide technical guidance of the federal reporting requirements and existing policy guidance. The Office of Audit adheres to the federal policy and reporting instructions as defined by the OCSE internal Divisions. The OCSE-157 is developed to capture activities conducted by states operating a child support enforcement program to ensure that they are in compliance with title IV, part D of the Social Security Act, Child Support Performance and Incentive Act of 1988 (CSPIA), and the federal regulations that govern the program. The OCSE-157 federal reporting instructions are not written to be all-inclusive. They are written to capture a snap-shot of all required activities governed by laws for states operating a child support enforcement program. In addition, there is existing policy guidance that clarifies additional reporting requirements. The audit process entails a detailed analysis and review to obtain a reasonable assurance that the system used by the state's IV-D program to compile and report performance measurement data is reliable and the data generated by that system is accurate and complete. This also incorporates an analysis and review for compliance with all federal reporting instructions, regulations, and existing policy guidance.

The audits are consistently conducted using evidence and a review of activities performed in the states system (manual or automated) as defined by Federal requirements and existing policy guidance. Audits are also conducted based on GAO standards. In these standards, auditors must test the evidence provided by the auditee as it pertains to sufficiency, competency and relevancy. The evidence must be sufficient. The evidence is sufficient, if enough evidence exist to persuade a knowledgeable person of the validity of the findings. These standards also address competency. In terms of competency, the evidence must be valid, reliable and consistent with fact. In assessing competence, the auditors must consider such factors as whether the evidence is accurate, authoritative and authentic. The standards also address relevancy. This means that the evidence must have a logical relationship with an importance to the issue being addressed. OCSE auditors, must test the evidence in connection with compliance to federal reporting instructions and existing policy guidance.

The Office of Audit must consider all evidence as a whole and apply that to the objective for the specific reporting line that is measured. The audit process does not concentrate on one piece of evidence to determine whether a case should or should not be reported on any given performance indicator line. Instead, the audit process requires a review of multiple pieces of evidence that support compliance with Federal reporting instructions and existing policy guidance. GAO standards are utilized by auditors to perform and document an overall assessment of the collective evidence used to support findings and conclusions, including the results of any specific assessments performed to conclude on the validity and reliability of specific evidence. When assessing the overall sufficiency and appropriateness of evidence, auditors evaluate the expected significance of evidence to the audit objectives, findings, and conclusions; available corroborating evidence; and the level of audit risk. If auditors conclude that evidence is not sufficient or appropriate, they will not use such evidence as support for findings and conclusions. Having a large volume of evidence does not compensate for a lack of relevance, validity, or reliability. The evidence must be consistent with fact in support of the objective or Federal



reporting requirements and existing policy guidance for the specific line being measured and reported.

When evaluating and reviewing the states data for reporting, discretion is not applied during the audit process. As noted above, to conduct audits, the Office of Audit uses Federal reporting requirements, existing policy guidance and GAO standards

Let's use an example of a Never Assistance intrastate case and the auditor is evaluating whether or not the case should have been reported on Line 1 on the OCSE-157 form (Cases open at the end of the fiscal year). Per OCSE Federal requirements, cases are considered never assistance when the recipient of services has not applied for or received public assistance and they file an application for services with the child support agency. In GAO standards relevance refers to the extent to which evidence has a logical relationship with, and importance to, the issue being addressed. Validity refers to the extent to which evidence is a meaningful or reasonable basis for measuring what is being evaluated. Among other requirements for this line, the auditors are evaluating the IV-D status of the case in compliance with federal requirements. The logical relationship to the objective or Federal reporting requirements and existing policy guidance for the specific line being measured and reported (i.e. verification of the IV-D status) is the IV-D application in a never assistance case. This evidence defines the reasonable basis for the acceptance of this supporting documentation.

Let's use another example. In a sample case where the IV-D agency reported Children in IV-D Cases Open During or at the End of the Fiscal Year With Paternity Established or Acknowledged (Line 6). Among other requirements for this line, the objective or Federal reporting requirements and existing policy guidance for the specific line being measured and reported is whether paternity was established for the child (ren) on the IV-D case. The audit process entails a review of the full case file to ensure that all documents are thoroughly reviewed and considered, as noted above. The full case file is also reviewed in order to ensure all pieces of evidence are reviewed and evaluated in compliance with GAO standards, Federal reporting requirements and existing policy guidance. While implementing GAO standards for sufficiency, relevancy and validity, the auditor also evaluates the logical relationship to the objective or Federal reporting requirements and existing policy guidance for the specific line being measured and reported. The logical relationship to the objective or Federal reporting requirements and existing policy guidance for the specific line being measured and reported is paternity establishment. OCSE federal requirements allows states various tools for paternity establishment such as support order (if paternity is defined for the child in the order); or Acknowledgement of Paternity or genetic testing, etc. If acceptable evidence is provided for the other requirements in support of this line, the auditor accepts the mentioned paternity document as acceptable evidence.

4. Directors expect Auditors will provide and explain authority and evidence that supports error findings, and will engage in dialogue regarding the finding. Directors expect the opportunity to partner with the Office of Audit and with OCSE Technical Assistance representatives to attempt resolution to disputed error findings before the audit is completed. If the Auditor cannot do this during the audit, then who does? Directors believe the disputed matter should remain open and the audit reasonably paused until evidence is received and understood leading to consent or an understanding that we disagree.

#### **OCSE Response to Question 4**

The Office of Audit cannot audit a state and turn around to provide technical assistance. This is one of the key reasons why when we cite any policy or regulatory requirements and if the state disagrees with our findings, we refer them to DRO and DFS staff to obtain the necessary guidance and technical assistance. This is embedded into the audit process. Communication is a critical component of the audit and applied to all phases of the audit process. We agree that states should partner with the Office of Audit and with their OCSE Technical Assistance partners at the federal level (i.e. DRO, DFS and DPT) which is why this is a critical component of the audit process. The Office of Audit heard the voices of the child support community and strengthened communication verbally and in writing of the findings in compliance with the federal reporting requirements and existing policy guidance. Audit's communication, roles of responsibilities and collaboration during all phases of the audit process has been discussed in detail in questions 1, 2 and 3 above.

5. Directors believe OCSE has the "burden of proof" to support an error in the first instance, from which the State can either concur with the Office of Audit or contest. If evidence or information is ambiguous, Directors expect that the finding will either be voided or identified as a "management finding" that is not considered in the efficiency ratings.

#### **OCSE Response to Question 5**

The burden of proof is on OCSE to provide you with clear and concise results based on the OCSE Federal reporting requirements, and existing policy guidance. The burden of proof is on the Office of Audit to provide you with an understanding of the conclusions for any sample case. We heard your concerns from various channels and have improved communicating effectively the audit results. OCSE is to provide technical assistance or other services, as applicable, per your request or as needed. Upon submission for the Federal forms, the burden of proof is at the state level to ensure that the data submitted as prescribed for Federal reimbursement is accurate, complete, and reliable based on OCSE Federal reporting requirements and existing policy guidance.

In instances where a state contests the audit findings, the Office of Audit provides a detailed response in support of what should or should not have been reported for the performance indicator lines based on the Federal reporting requirements and existing policy guidance.

Furthermore, to conduct audits and as noted above, the Office of Audits uses Federal reporting requirements, existing policy guidance, and GAO standards. In instances where the federal reporting requirements are ambiguous, the Office of Audit immediately seeks clarification from OCSE. For example, in some cases, audit was informed that the regulations are ambiguous and those cases reported by the auditee did not result in error findings based on the decisions made by OCSE.

In addition, the audit process is designed to provide states with all recommended actions to correct deficiencies and other findings identified during the audit to improve programs and operations. Management findings do not align with ambiguity. The results from management findings are communicated to the states during the audit process and again at the exit briefing. Management findings align with recommended actions that are provided to the states that (1) did not result with a state failing the performance indicator lines or an efficiency rate that is below 95 percent or (2) where data sampling was not completed because the audit was a Data Reliability Review or (3) disclosure of weaknesses with physical security and internal controls. These deficiencies are presented to the state to provide them with an opportunity for correction in order to avoid any adverse impact(s) on their reporting results in the future.

6. Directors want to resolve error findings and have an opportunity to reverse them prior to OCSE's completion of the audit and report. When the State disagrees with an error finding or evidence (if any) used to support the finding, there is no true means to contest it. While Directors will certainly consent to error findings, and design corrective action that may include costly systems changes or legislation, it is extremely concerning when OCSE or the Office of Audit expects States to take such action as a result of findings that remain in dispute, yet provides no means to resolve the dispute and no consideration for the State's evidence, information, and impacts.

### **OCSE Response to Question 6**

There are processes in place at the OCSE level for states to dispute, contest and voice any concerns. This document provides:

- insight into the entire audit process;
- the roles and responsibilities of the OCSE internal Divisions;
- the collaborative efforts of those internal divisions and how they align with the audit process;
- the form of evidence and how it aligns with GAO standards and the federal reporting requirements and existing policy guidance;

- the communication components between OCSE internal Divisions through the entire audit process from the planning stage to the issuance of the final report;
- the explanation of how the Office of Audit does not create OCSE policies but rather ensures compliance with the established policies;
- the internal divisions that provide technical assistance in compliance with federal reporting requirements and existing policy guidance that OCSE has available to states to assist with accurate, complete and reliable reporting;
- the open door policy that all OCSE Directors, including the Acting Commissioner and Deputy Commissioner has instituted and will continue to remain in effect with our state grantees at all levels.

These processes are applied consistently from the OCSE Federal level by all OCSE Divisions, and not just isolated to the OCSE Office of Audit.

7. Directors believe it is important to acknowledge that knowledge transfer does not necessarily occur for Directors or Auditors during attrition. States need a basic level training for new Directors and advance training for all Directors on the DRA and DRR, which would include the items mentioned in this list. Directors believe Auditors should receive the same trainings.

### **OCSE Response to Question 7**

In every organization, attrition can result into various risk that can be mitigated with strategic processes in place to minimize the risk levels. Currently, the strategic processes that OCSE has in place uses resources or tools such as trainings, webinars, workgroups, utilization of third-party vendors for training, internal peer-to-peer training, workshops, etc. for Directors and Auditors. These processes are strengthened by the continuous trainings that are currently being provided to the Federal OCSE Directors and staff, which includes all Auditors, and all our OCSE state grantees.

All Auditors received several refresher trainings in 2020 to ensure the Office of Audit's evaluation of the states' data to Federal regulations, reporting requirements and existing policy guidance is uniform and consistent. In addition, OCSE provides tools to states such as site visits that allows for a direct connection from DFS and DRO staff to provide technical assistance to states at various levels. This strategic process further minimizes the risk level of receiving error findings because it provides states with pertinent information required for reporting accurate, reliable and complete data.

**NCCSD Audit Committee**  
**Data Reliability Audits**  
**Survey Results – Key Points**

Thirty-one responses were received. Somewhat Agree and Strongly Agree were considered as agreement.

**The DRA Process**

- While most respondents understand the DRA process (81%), a somewhat smaller number of respondents understand how the auditor determines findings (68%) and understood and were satisfied with the explanation or documentation provided by the auditor (65%).
- While all the respondents felt they were given an opportunity to refute findings (or were neutral in their response), a small number felt that their explanation or evidence was not reasonably taken into account (16%).
- States were asked whether they received timely technical assistance regarding error findings when requested. Many states provided a neutral response (42%) which could indicate that many did not have error findings and thus did not request it, but it could also indicate that some states were not asking for it or taking advantage of the opportunity. Most states who received technical assistance (i.e., did not provide a neutral response) agreed it was timely (78%) and resolved the issue (74%),
  - Comments suggest that perhaps respondents were unclear about what technical assistance means in the context of DRA.
- Individual comments received indicate specific issues states are having and although, not many, states are still having frustrating experiences with their Audit.
- About half of the respondents (52%) indicated that they had a consistent auditor over the last several years while the other half (48%) had at least two different auditors.
- Almost half of the respondents (45%) were recently experiencing new findings that they have never received before (41% had not and 14% did not know) and of those that have, a vast majority (85%) disputed the new findings. Also, the vast majority of states (93%) did not have findings that they considered out of scope of the audit.

**Logistics/Status**

- 90% of respondents have some kind of electronic case file for the auditor to review.
- 76% of respondents indicate that their auditor accesses their automated system remotely (pre-COVID), 17% indicate their auditor accesses their automated system both remotely and within their office and only 7% indicate their auditor only accesses their automated system within their office.

- 52% of respondents do not limit the auditor's access to their automated system in any way while 28% do and 21% did not know.
- In FFY18, 52% of the respondents had a DRR and 48% had a DRA. All audits were completed with only one respondent awaiting their final report. Only one respondent expected to fail at least one line item and one respondent disputed error findings (two respondents did not know if they disputed any error findings).
- In FFY19, 62% of the respondents are having or had a DRR and 38% are having or had a DRA. 59% of those audits are complete.

### **Directors' Needs**

- Respondents were given the opportunity to review eight items that may be helpful in future audits (documentation, training, etc.). Seven of the eight items were selected by more than 75% of the respondents (the eighth item was selected by 65% of the respondents).
- The top three items are as follows:
  - A complete map of the process from start to finish.
  - Knowledge and understanding of what auditors use for guidance in their determinations, including a description of how an error is determined in practice, what auditors use for information and evidence and what they exclude
  - OCSE providing and explaining the authority and evidence that supports each error finding.

### **Next Steps**

Based on the results of this survey and in-depth discussions among state directors in the past 18 months, it is very clear that more information and assistance for directors is needed. As a next step, NCCSD intends to put together a plan to develop the top three items we see as essential to the success, collaboration, and mutual objective of the Data Reliability Audit. In the spirit of that collaboration and the partnership between OCSE and states, it is our hope that OCSE will join us in this endeavor.



**TO:** NCCSD

**FROM:** Jim Fleming, Workgroup Chair

**DATE:** July 19, 2021

**RE:** Child Support-Employer Collaboration Workgroup Annual Report

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This workgroup was an extension of the previous employer collaboration group and is working on the action items identified during the 2019 Employer Symposium. The workgroup consists of several state IV-D directors and key internal subject matter experts, the OCSE Employer Services team, the American Payroll Association, and representatives from many large national employers.

The workgroup continued its work from the previous year, with the focus for the year being on updating the template response to verification of employment requests from states. The data elements requested by states were compiled and sorted by how many states asked for the same piece of information. The template was reviewed over the course of several meetings and now is ready for a review of the final round of comments from directors before being considered final. 45 states and territories have indicated willingness to accept the template response.

The workgroup also compiled information on how states used the various identifiers currently included in the income withholding order form. Despite the variety of usage, there appears to be potential for reducing the number of indicators from three to two. The workgroup received information from OCSE on an upcoming eNMSN project and from CSLN and Rhode Island Director Sharon Santilli on the consortium's new service regarding lump sum payments.

In its last meetings, the workgroup began a high-level discussion on what a national employer database would look like.

I appreciate the support for this workgroup from many states, particularly the commitment of their in-house experts in the employer services area to describe their processes. I believe the best way forward is to compare the business processes of some of the larger states as a model for a national approach.





**TO:** NCCSD

**FROM:** Joint NCCSD/NCSEA/OCSE Public Relations Committee

**DATE:** July 14, 2021

**RE:** Joint Public Relations Committee Annual Report

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The National Council of Child Support Directors (NCCSD), National Child Support Enforcement Association (NCSEA), and the federal Office of Child Support Enforcement (OCSE) proposed a child support public relations initiative nationwide to promote a more positive, holistic image of the IV-D Program and improved understanding of its services. The Public Relations Committee is comprised of representatives from NCCSD, NCSEA, and OCSE. The Committee is responsible for creating, developing, and implementing an initiative to improve the perception and awareness of the program.

### **Initiatives completed in 2018**

The Committee conducted two surveys of state child support agencies to learn more about their current outreach and public relations tools, services, and messaging. This initiative provided a snapshot of the state of child support public relations today and offered an opportunity to learn about innovative and successful approaches used in states. To learn more about current public relations and outreach efforts across the country, the Committee sought to create a baseline of current outreach efforts. The results were remarkably similar in that they showed a lack of coordinated efforts nationwide to conduct outreach.

### **Initiatives completed in 2019 and 2020**

The Committee identified several objectives, including the development of strategies to educate legislatures, court systems, employers, and other stakeholders about the child support program and the importance of their role in helping families and facilitating payment of support. It also sought to develop strategies to change the perception of the program by the general public, as well as the child support community itself, so that the program is viewed as a service agency whose goal is ensuring children have the emotional and financial support they need. To assist child support programs across the



country, the Committee developed several talking points to use for different purposes and for different audiences. The Child Support Program Talking Points publication is a result of the joint efforts of the Committee to help meet those objectives and was distributed out to all directors through the NCCSD List Serve.

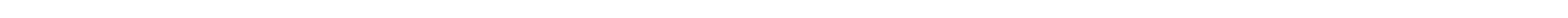
### **Initiatives in progress for 2021**

The Committee is proposing the develop a national application, or enrollment form. This is believed to be the single fastest action we can take to address the declining caseload, and it will create simplicity and consistency for our customers around the nation. Following up the dramatic findings in the OCSE Digital Media Marketing Grant, in which Virginia saw a 22% increase in case openings in a month after launching a new online application and Minnesota gained 1,000 new cases during their testing of a similar approach, it's clear that we all would gain immediate benefits from a short, simple, mobile responsive application. NCSSD believes they can host the website that would manage such a national effort and route the completed applications to the appropriate states for processing, and we in California have sent out the prototype from our own application project for other states to review.

Another finding from the Digital Media Marketing grantees is that our messaging is hit and miss when it comes to correctly identifying benefits of our program that will resonate with our target audience. The Committee will be addressing the need for more market research which can be designed to elicit the reasons why parents don't come to us and identify options or services we could offer that would address their needs, resonate with them, and stimulate case openings.



# The Case for National Enrollment



# 2017 Market Research

- Commonly chosen words:
  - Bureaucracy, difficult, paperwork, slow, headache
- Descriptors:
  - Complicated, confusing, intimidating
  - “They ask for BOOKS of information”
- What the Customer Wants
  - Technically advanced, approachable, responsive, straightforward





# We Know Complexity is a Barrier

# California Website Traffic Data

- Not Mobile-Responsive – 3.6M unique pageviews first half 2019
  - 56% via mobile
- Mobile-Responsive – 11.8M unique pageviews in 2020
  - 86% via mobile
- “Apply For Services” consistently in Top 10 Pages Viewed



# Online is a Requirement, Not a Luxury



# OCSE Digital Media Marketing Grant

- **Virginia** - Tested a two-page online application –
  - 22% increase in unassisted case openings,
  - 12% increase in formerly assisted case openings during rollout phase
- **Minnesota** - Took application from 16 pages to 10 –
  - increase of 1,000 submissions in three months
  - Normal annual applications are around 9,000 a year
- No other activities increased case openings this significantly

OCSE Digital Media Marketing Grant





# Simplification Gets Immediate Results



# Virginia's New Online Enrollment Form

- Custom-built using in-house IT
- Concept to final execution within six months
- Single page, bare minimum to open a case
- Linked to Google Analytics
- **Did I mention the 34% increase in case openings?**



# Virginia's Current Implementation

## NEXT STEPS:

- Original output in PDF format that caseworkers manually entered in database
- Full integration with case management software by August 2021
- E-signature goes live August 2021
- Upon “submit,” applicant will now get email with invitation to register on self-service platform and instructions to upload further documents



# View Virginia's Form

[mychildsupport.dss.virginia.gov/McsCaseApplication/ApplyNow](https://mychildsupport.dss.virginia.gov/McsCaseApplication/ApplyNow)



# California's Current Pilot

## GOOD FOR THE CUSTOMER

- Hover Tips to explain each step
- Behavioral Economics
- Option not to begin but to simply receive info
  - Choose time and contact method
  - Progress updates
  - Can save and return
- See only what needs an answer
- Receive Confirmation Email
- Receive copy of Submission plus info documents



# California's Current Pilot

- Uses SimpliGov – GOOD FOR THE AGENCY
  - Does not need programmers – WYSIWYG content management platform
  - Google Maps to standardize addresses
  - Electronic Acknowledgment of required documents
  - Reminder Emails automatically sent
  - Can't submit without all mandatory fields complete
  - LCSA Output configured for ease of input into databases
  - Routes the completed output by state or zip codes
- NEXT STEP – DocuSign forms via e-mail



# View California Pilot

<https://cadcss.preprod.simpligov.com/preprod/portal/ShowWorkFlow/AnonymousEmbed/ddff137d-bcd2-4622-8e8f-60abec6b65b3>



# The Benefits of a Single, National Enrollment Form



# Why Is This a Good Idea?

- Normalization. The concept of a single national center for services for single parents, under the aegis of ACF, places child support squarely in the “simple necessity” category
- Simplification. We need to admit that our complex processes make things easier for US, not our customers
- Consistency. Standardizing enrollment in the program will go a long way towards addressing our “incomprehensible” reputation
- **SINGLE FASTEST ACTION WE CAN TAKE (WITH DOCUMENTED RESULTS!) TO ADDRESS DECLINING CASELOAD**





# Considerations/Implications

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- More work on intake
- Security of data comes at a price
- Expectation that eventually we would move toward system integration
  - SimpliGov exports into most common database formats
- Wouldn't replace current applications... but it could if you prefer it



# NCSEA/NCCSD/OCSE Public Relations Committee

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Based on all of the previous data, the formal recommendation to all directors is a single, national child support enrollment form



# The Fine Print

California is exploring our ability to build, host, and maintain a national SimpliGov-based enrollment process

- OCSE would probably need to purchase SimpliGov license (\$1.5M including PII security)
- Networks, backups, recovery, redundancy DCSS: \$1M
- Ongoing hosting CDT \$200K (annual total)



# The Fine Print (continued)

- Initial cost of SimpliGov version \$7M
  - \$6.1K to build MAIN workflow
  - California pilot was built in less than 100 hours, but integration TBD
- Build state specific forms \$1.5K (per) SECONDARY, dependent workflow
  - Completed submission generates link to form asking required state-specific info

MAIN and SECONDARY workflow benefits:

- Troubleshooting issues is easier – can isolate and manage problems readily
- If one state requests a change, it doesn't impact other states or questions downstream
- Better accounting of time going into each state's respective application



# Expectation for Participants

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- Data Governance
- Acceptance of manual entry for period before integration
- Acceptance of federal info requirements for initial case opening
- Consolidation of extra state requirements to bare minimums





# MENTIMETER



**TO:** NCCSD

**FROM:** Karen Hebert, Committee Chair

**DATE:** July 14, 2021

**RE:** Mentoring Committee Annual Report

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The following directors serve on the Mentoring Committee:

- Kristie Arneson, Wyoming
- Larry Desbien, Colorado
- Chad Dexter, Montana
- Karen Hebert, Chair, New Hampshire
- Lily Patteson, Kentucky
- Eileen Stack, New York

Members are responsible for identifying the vision, purpose(s), and objectives of the Committee, and for developing and implementing activities that support Committee objectives, and for the dissemination of any relative information to the National Council Executive Committee and other Council members as applicable.

The Committee developed its Charter, which was submitted to the NCCSD Executive Committee in January 2020. The Committee's vision is that all state and territory IV-D Directors feel welcome and supported by their peers in a culture where learning is a constant and achieved more easily. The purpose of the Committee is to provide professional support to state and territory IV-D Directors and strengthen the National Council to ensure positive outcomes for families served by the Child Support Program.

Primary objectives are to:

1. Share knowledge, experience and expertise among state and territory IV-D Directors;
2. Maintain a culture of support, reliability and trust among all state and territory IV-D Directors; and
3. Overcome challenges in meeting Child Support Program objectives.

To meet objectives, the Committee continues to support state and territory IV-D directors, specifically targeting newer directors. The Committee currently meets monthly. Activities include conducting outreach and welcoming communications to new state and territory IV-D directors on behalf of the National Council, facilitating monthly

voluntary call-in meetings, and sharing documentation that may be provided during those calls.

Directors continue to express the importance of having reliable exchanges and information sharing with other directors to gain insights, seek innovation, and to promote and accelerate professional development and leadership skills for the directors' unique role and responsibilities within the Child Support Program. The past year has been a remarkable experience for all directors in our response to pandemic impacts. NCCSD has provided extraordinary support and opportunity for directors to connect and assist each other.

### **Call-in Meetings**

Monthly call-in meetings are highly valued by directors. The success is a fine example of the long-supportive culture fostered by directors. The calls have been a prime place and time to learn, and to share information, ideas, and experiences. Agendas are director-driven and include anything related to Child Support that a director needs or needs assistance with.

During the second half of 2020, monthly calls received high attendance where directors shared a great deal of information regarding pandemic-related business practices and updates to common challenges, e.g., EIP reversals, Congressional pandemic benefits. At the end of 2020, the popular "Time for You" theme evolved as states moved out of the chaotic environment and began to refocus on general business needs. The Committee determined it was time to refresh the monthly theme to accommodate directors, and the name of the monthly calls was changed to "NCCSD Team Huddle". Agenda items from directors in the first half of the 2021 calendar year included challenges with administrative enforcement remedies, business practices in a remote environment, audit issues, distribution questions, and system topics. Directors have been able to share information with each other regarding onboarding guides, training programs, use of incentive funds, procurements, and issues with OCSE actions/non-actions. It is clear that the monthly Huddles are a valuable use of time, keeping directors well connected.

### **New Directors**

2020-2021 has seen several retirements and new directors across the country. The Mentoring Committee actively welcomed each new director, personally inviting them to the monthly Huddle, and providing them with a copy of the 2018 OCSE Recourse Guide for Directors. The Committee reached out to the directors in the same region of the new director asking them to personally contact the new director in support of any immediate needs. Feedback indicates this practice has been very much appreciated.



## **Training and Support**

The Mentoring Committee provided the National Council with recommendations for the director training at the end of the NCCSD Annual Meeting. The Council has arranged for OCSE's Financial Management training, taught by professional consultant/former director Wally McClure. A pre-meeting training was also scheduled for directors on Distribution taught by Elizabeth Morgan. Other available trainings will be considered by the Committee to offer new directors in the future, such as the basic training created for legislators.

The Committee's intent to develop a structured mentoring program for newer directors continues. The Committee conducted a survey in August 2020 to gather thoughts from directors for designing such a program. Written results from the survey were reported to the Executive Committee in September 2020 and are incorporated by reference. Several next steps were completed, including redefining the monthly calls, and collecting information for a future resource guide. One of the next steps was to seek subject matter experts among directors to be identified for all. This activity stalled as only five directors responded. The Committee determined that most directors do not consider themselves "experts". A new approach to this has yet to be formulated.

## **New Director Resource Guide**

Directors, particularly new directors, have expressed a need for some kind of resource guide that would provide them with fundamental and specific information in support of their role. Particularly of interest is information needed for the first 90 days of appointment, whether their status is interim, new from the outside or promoted from within the program. The Committee sought direction from the Executive Committee to either create a new guide, or make recommendations to revise the 2018 OCSE Resource Guide for Directors. The latter was decided upon, and the Mentoring Committee is presently preparing revision recommendations.



**TO:** NCCSD

**FROM:** Erin Frisch and Eileen Stack, Committee Co-Chairs

**DATE:** July 16, 2021

**RE:** Policy and Practice Committee Annual Report

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The NCCSD Policy and Practice Committee had a productive 2020-2021 year, meeting monthly starting on October 1, 2020. The committee was co-chaired by Erin Frisch and Eileen Stack and consisted of representatives from approximately 20 states. The Committee's work involved monitoring and assessing federal rulemaking, proposed federal legislation, federal OCSE policy issuances, and various programmatic impacts and needs arising from the pandemic.

#### **Federal Rulemaking**

The Committee assisted in preparing and drafting comments to a September 17, 2020 NPRM from OCSE proposing to provide states with two optional exceptions to the prohibition against treating incarceration as voluntary unemployment. The Comments addressed technical concerns with the proposed regulatory language and were submitted to OCSE on behalf of NCCSD.

#### **Proposed Federal Legislation**

The Committee conducted a preliminary review and assessment of the Strengthening Families for Success Act outlining specific areas for further discussion and language review. The Committee is continuing its work in anticipation of upcoming legislative action on the bill.

#### **Recommendations for the New Administration**

Several meetings of the Committee have been devoted to identifying and developing a proposed future vision and agenda for the new administration. As part of this work, the Committee reviewed NCSEA resolutions, NCCSD's and NCSEA's comments to the October 23, 2014 federal request for information for OCSE's Report to Congress, and NCCSD's 2017 Future Focus Survey outcomes, and put together a draft NCCSD federal agenda document to present to the executive committee and association.

Other assignments included monitoring and assessing OCSE policy issuances, evaluating issues impacting state programs including federal tax offsets issues and

reversals stemming for COVID relief, and monitoring developments with Medicaid referrals. In December 2020, a subcommittee on administrative enforcement was formed to explore how state programs modified administrative enforcement mechanisms during the pandemic, how those modifications impacted programs and whether recommendations for permanent changes to administrative enforcement mechanisms or approaches should be made. The subcommittee's survey to states will be issued in the near-term.



**TO:** NCCSD

**FROM:** Carla West and Robin Arnell, Workgroup Co-Chairs

**DATE:** July 15, 2021

**RE:** Systems Modernization & Data Analytics Workgroup Annual Report

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### **Membership**

The workgroup currently has 23 members with the composition equally divided between IV-D directors and state IV-D employees who specialize in IV-D systems work. Now that the streamlined Feasibility Study is complete and the focus of the workgroup's work has shifted, OCSE has decided to step off as official members and has agreed to participate on an invitation basis. The one exception is OCSE Senior Technical Advisor, Cynthia Longest, who was contracted under the prior OCSE administration to provide collaborative support to IV-D directors and their delegates.

### **Summary of Workgroup Work for 2020 – 2021**

- Reviewed and offered feedback to OCSE relative to the new streamlined feasibility study prior to the release of AT-20-16 (*Streamlined Feasibility Study for Child Support for Child Support System Modernization*) published on December 16, 2020.
- Created a document that illustrates the complexities of the IV-D distribution process at a high-level for individuals who are not familiar with the nuances of the program. The workgroup's goal was to create a document that can be used with non-child support systems technology executives, administrators under their umbrella agency, legislators or perhaps even a training tool for new child support employees. The *IV-D Distribution At-A-Glance Document* was disseminated to all directors on the NCCSD listserv in February 2021.
- Prepared and disseminated a survey for directors that polled interest in hearing from states who are in various stages of a systems modernization project. The survey simultaneously solicited volunteers to participate in upcoming webinars. The workgroup spent a lot of time pulling topics and sub-topics together which

can also be used as a comprehensive checklist for states when embarking on a systems modernization project.

- Planning for upcoming webinars currently occupies most of the workgroup's time. Five "States Lessons Learned" webinars will be held in October and November (dates to be finalized after consultation with presenters). Webinar topics will be: 1) Pre-planning and Planning, 2) Procurement, 3) Development, Design, and Implementation (DDI) I, 4) DDI II, and 5) Certification.
- Data Analytics: The workgroup sponsored two Data Analytics webinars: one that featured IWO data and the other that focused on Current Support data. There were five webinars in all, and all were very well attended. The next series will focus on Overall Collections.
- Recordings of webinars are stored on the OCSE Collaboration Tool. Another feature will soon be added to the tool to store other items like the "States Characteristic Matrix." Cynthia Longest is scheduled to walk through the new feature this week.



**TO:** NCCSD

**FROM:** Kate Cooper Richardson, Committee Chair

**DATE:** July 19, 2021

**RE:** Website Committee Annual Report

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### **Membership**

- Kate Cooper Richardson, Oregon IV-D Director (chair)
- Craig Burshem, former Virginia IV-D Director
- Jeff Cohen, retired Vermont IV-D Director
- Paula Phillips, Arkansas IV-D Policy Manager
- Amy Price, Michigan IV-D Communications Specialist
- Nisha Garimalla, ProTech Solutions, Inc.

### **Meetings in 2020-21 Committee Year**

- No formal meetings

### **Summary of Activities**

The Website Committee develops and maintains both the NCCSD website (on a WordPress platform) and the NCCSD directors' listserv. The committee has not held formal meeting since the outbreak of the pandemic, instead taking care of any necessary actions via email communication. The focus for this committee year was extremely limited due to other demands (on the chair, almost exclusively). The priority for the first part of the committee year was still on pandemic-related matters, maintaining the listserv due to especially heavy use and uploading pandemic-related resources to the website as quickly as possible.

The approach for the second half of the year was maintenance only for the website and the listserv, although the website is in need of software upgrades.

Activities include:

- Maintained Covid-19 section on Resources page
- Maintained website current user list, including deleting former users and adding new IV-D directors
- Individual user help for website: instructions, resetting passwords, etc.

- Maintained listserv current user list, including deleting former users and adding new IV-D directors
- Individual user help for listserv: bounce action notifications, listserv moderator requests, etc.

### **Future Plans**

As the chair, I recommend that, for the sake of sustainability and continuity, NCCSD consider investing in its future by engaging professional services to set up a website on a platform that meets NCCSD's needs better than WordPress. WordPress is targeted more to graphic and website designers, but there are platforms that would allow NCCSD to just be content managers, not technicians. The leading example is Squarespace, but there is also Wix and Weebly (although I believe Squarespace bought Weebly). A site on a platform like Squarespace would not require full-time professional assistance, although for an initial build and occasional upgrades, it would be worthwhile to engage some services.

The Website Committee would research the options, gather some quotes, and provide a proposal to the NCCSD Executive Committee.

The listserv would not need to be a part of that effort; it's simple, but it's working. The barriers that some listserv recipients experience are due to their respective state email systems, not the listserv itself.

### **Shout-Out**

The Website Committee could not manage without the generous volunteer work of Nisha Garimalla and ProTech Solutions, Inc. The technical assistance—graciously and quickly provided—virtually (literally!) keeps NCCSD going.