

CALIFORNIA DEPARTMENT OF CHILD SUPPORT SERVICES

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



September 9, 2014

CSS LETTER: 14-05

ALL IV-D DIRECTORS
 ALL COUNTY ADMINISTRATIVE OFFICERS
 ALL BOARDS OF SUPERVISORS

SUBJECT: ELECTRONIC PAYMENT PROCESSING

REFERENCE: CSS 09-13 PROCESSING FOR LOCALLY RECEIVED PAYMENTS

The purpose of this letter is to outline the mandatory and currently approvable methods for the acceptance of electronic payments at the local child support agency (LCSA) level. Electronic payments include payments that are made with a credit card, debit card or by providing a bank account number. LCSAs are to cease any other prior practices for accepting such payments, effective October 31, 2014. This letter supersedes LCSA letter 08-12, dated August 6, 2008.

Use of the electronic payment methods other than those described below constitute a violation of the Merchant Services Agreement between Department of Child Support Services (DCSS), Xerox (the State Disbursement Unit or SDU) and Wells Fargo (the merchant bank), which has agreed to host the electronic payments being processed within this framework. Any violation of this agreement may subject the State, the SDU, and LCSA workers to investigation by MasterCard, VISA, or the merchant bank, and could result in fines, penalties, or termination of the electronic payment program.

This letter establishes uniform practices statewide in order to comply with the Payment Card Industry (PCI) Compliance Standards. PCI Compliance Standards are technical and operational requirements set by the PCI Security Standards Council to protect account holder data and/or sensitive authentication data. The Xerox-managed SDU Texas Call Center is a centralized, PCI compliant operation that will act as an extension of the California SDU for electronic payments only.

The acceptance of electronic payments is an important component of overall child support collections. On September 15, 2014, LCSA staff who have completed mandatory training will have two new methods for processing electronic payments:

Customer Call Transfer:

- ✓ ECSS Call Center Agents at the county level will be able to transfer the call to a live agent at the SDU Texas Call Center. This is the preferred methodology.

<u>Reason for this Transmittal</u>
<input type="checkbox"/> State Law or Regulation Change
<input type="checkbox"/> Federal Law or Regulation Change
<input type="checkbox"/> Court Order or Settlement Change
<input type="checkbox"/> Clarification requested by One or More Counties
<input checked="" type="checkbox"/> Initiated by DCSS

The only interruption to the transfer will be a brief automated message that provides the remitter a choice of speaking with an English or Spanish-speaking agent, and identifies information needed to complete the payment.

- ✓ LCSA staff will be provided a new toll-free number to forward payment calls from their desk to a live agent at the SDU Texas Call Center. The only interruption to the transfer will be the same brief automated message. Please note that the ability of staff to transfer calls from their desks varies from office to office, thus this method is limited to offices with this capability. The toll-free number for the SDU Texas Call Center will be provided in the training materials. The toll-free number is for LCSA staff use only, and must not be given to the customer.

LCSA Website Payment Screen:

- ✓ Using a new LCSA website payment screen, authorized LCSA staff may enter payment information directly into the SDU Website. A hyperlink has been created to allow authorized staff to access the new website payment page screen from within the Child Support Enforcement (CSE) Participant Overview Page. LCSA staff who will be accessing the web payment page through CSE must first take mandatory training and receive a certificate of completion before the appropriate security role may be granted by their manager and LCSA System Administrator. In designating staff authorized to process electronic payments, LCSAs must ensure adequate separation of duties.

Training on the call transfer and new website payment screen is provided by DCSS's Statewide Training Branch. The self-study training module and *DCSS Guide to Accepting ePayments*, are located on the Child Support University and will include guidance on the most recent PCI standards. The self-study module is a mandatory training for authorized staff who accept electronic payments. All staff who participate in this practice must take the training. A certificate of completion must be provided to the LCSA System Administration prior to receiving the payment collection security role.

Customer Self-Service Tools:

- ✓ California's child support program continues to rely heavily on self-service tools for accepting customer payments. LCSA staff are reminded to encourage customers to make a payment using the secure California SDU Website and/or Interactive Voice Response line. Staff should educate customers on how to access, register and make a payment using these self-service tools.

To improve security and safety in accepting electronic payments, LCSAs are required to implement the following:

- Use only the above referenced methods to accept electronic payments.
- Restrict access to cardholder data to staff who have completed the mandatory *Accepting ePayments* training course, received a certificate of completion, and have been authorized by the LCSA to accept electronic payments.
- If staff are not authorized to enter electronic payments online, they must route or transfer calls to someone in the office who has this authority or to the SDU Texas Call Center. Do not use any other tool to enter electronic payments.
- Remind staff of the penalties for accessing or disclosing personal information for a non-business need.
- Assign functional roles in a manner that establishes adequate separation of duties. If resource constraints prohibit full separation of duties, supervisors must perform timely reviews of electronic payment processing.
- Never write down or copy cardholder information provided by the noncustodial parent (NCP)/third party remitter.
- Conduct in-person electronic payment services in plain sight of the person making the payment.
- Return any hard-copy account or credit card information provided to an LCSA worker, directly back to the NCP/third party remitter making the electronic payment.
- Ensure that LCSA kiosks and telephones made available to NCPs/third party remitters provide an adequate level of privacy.

LCSA implementation of this letter is required by October 31, 2014. This transition period is provided in recognition of federal fiscal year-end activities. It should provide LCSAs with sufficient time to ensure that appropriate staff receive the required training, designate staff authorized to process electronic payments, and develop operational procedures to implement the provisions of this letter.

It is important to the child support program to accept electronic payments safely and securely. The direction provided in this letter is an attempt to mitigate risk and meet PCI standards associated with electronic payments. We will monitor this area closely and expect to develop new methods to take advantage of improved technology and reduce risks moving forward.

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Please contact Business Solutions at ccsasbusinesssolutions@dcss.ca.gov if you have any questions.

Sincerely,

O/S

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& Intergovernmental Services