CALIFORNIA DEPARTMENT OF CHILD SUPPORT SERVICES
P.O. Box 419064, Rancho Cordova, CA 95741-9064

December 12, 2000

LCSA LETTER: 00-08

TO: ALL IV-D DIRECTORS

SUBJECT: PRISM ADVISORY GROUP NOVEMBER 6, 2000 MEETING QUESTIONS AND ANSWERS

Please find attached the questions and answers from the special November 6, 2000 Pre-Statewide Interim Systems Management (PRISM) Advisory Group (PAG) meeting. The purpose of the special meeting was to discuss the new CS 155, 156, and 157 reporting requirements. Regular PAG meetings will resume effective December 5, 2000.

For this special PAG meeting, counties submitted questions to DCSS in advance of the meeting. DCSS developed draft responses, which were distributed to attendees at the start of the meeting. The draft responses were discussed, and where additional clarification was needed, or a change in the draft response occurred as a result of the discussion, these changes are noted as such in the attached document.

If you have any questions, please contact Evan Auberry, PRISM Branch Manager, at (916) 464-5350.

Sincerely,

CHERYL HOTALING
Deputy Director
Technology Services Division

PAG MEETING, NOVEMBER 6, 2000

The following questions were submitted by the counties prior to the November 6, 2000 PAG meeting. DCSS distributed draft responses at the beginning of the PAG meeting; additional discussion that occurred at the PAG meeting itself is noted as such.

1. One of the CASES counties spoke to Donna Martin and was provided with an edit sheet to validate that the figures are reported on the CS157 correctly. The county contacted me and also provided me with the listing. She and I went through each line item and discovered a "BIG" problem. The problem is with the numbers reported on Section C: SERVICES PROVIDED line 8. According to the edit list, Line 8 must be equal to Line 1 minus line 2. Our figures, based on this edit, are not even in the ballpark.

   San Francisco figures:

LINE #	CURRENT	FORMER	NEVER	TOTAL
1	12,844	12,762	3,291	28,897
2	10,533	11,494	2,810	24,837
1 minus 2				**4,060**
8	1,563	887	332	**2,782**
Difference				**1,278**

   The difference being 1,278, which is approximately the number of cases in our Locate for establishment caseload.

   We took a look at the instructions from the state dated Oct 14, 1998 FSD letter 98-27 and the instructions say " If a case requires multiple services, i.e., locate, paternity establishment, and/or enforcement, the case should be reported only where it "sits" at the time of reporting." So, if a case needs an order established but it is in a locate status, from this instruction, I would NOT report the case in line 8.

   So, we took a look at the OCSE AT 99-15 dated December 22, 1999 from the Feds. This AT was distributed at the last PAG meeting and we are still waiting for the final instructions from the state for the revisions that we need to do based on the federal instructions. In this AT under Questions and Answers for section 3 Services Required:

   > "Question 13: Since states no longer report on line 11, Cases Requiring Location Services, should the cases that would have been reported on that line be included in count for line 12, Cases Requiring Order Establishment?"
   >
   > Answer: Yes.

(Note: The State confirmed on 11/3 from the feds that, "Since line 11 of the OCSE-157 has been eliminated, the State does not need to report cases that require locate services only.")

Based on the federal instruction, the state instructions need to be changed, as we are not reporting cases that need both location and order establishment in this line item and have never been advised that we should be doing this. In addition, the edit logic, would still not be correct for the following situation:

> I have a case with two children who are with one Custodial Person so it is just one case. One child has an order and one child does not. This case would be reported on Line 1 as 1 case, on line 2 as 1 case as I have an order for one child and then on line 8 as 1 case as I still need to establish an order for the second child. Line 1 minus line 2 = 0 and line 8 = 1 so the edit would not be correct.

RESPONSE:

(Note: References to line 8 in the question correspond to the 10/98 version of the CS 157. Line 8 has since been renumbered and is now line 12 on the new CS 157 10/00.)

Yes, this case should be counted on Line 1 as an open case, on Line 2 as a case with an order, and on Line 12 as a case requiring services to establish an order. When the second child is added to the order, this case would also be counted on Line 17 as a case for which an order was established. See AT-99-15, Question 16.

11/6 PAG - This is a three-part question. Part 1 deals with "in-house" edits associated with reporting. Part 2 deals with how to count "cases requiring locate services." Part 3 deals with counting multiple children within the same case; some children with and some children without support orders.

- Part 1 - The edit will be removed. Counties are cautioned to be careful when counting orders established for a subsequent child. That action can be counted in Part D, Services Provided but it should not be added into the inventory on Line 2. Count cases only once regardless of the number of orders.
- Part 2 - Include cases requiring services to establish a support order. Additionally, counties are to count the number of children requiring paternity determination services. Counties are no longer required to report cases requiring locate services.
- Part 3 – The case should be counted on Line 1 as an open case, on Line 2 as a case with an order, and on Line 12 as a case requiring services to establish an order. When the second child is added to the order, this case would also be counted on Line 17 as a case for which an order was established. See AT 99-015, Question 16.

2. Based on the instructions in the ACF letter, DC-00-77 (data Reliability Audit Requirements for FFY 2000), this question is in regards to closed cases. At the October 5 PAG meeting, it was indicated that we should only report the closed cases on this audit trail for the cases that were closed during the audit time period. As I read the letter, it seems to indicate that the Feds want all closed cases. The wording is as follows: "We are requesting the complete Child Support Universe which would include all closed cases and all non-IV-D cases on the child support system as of the end of the fiscal year." I just want to make sure what it is that we are to put on the audit trail.

   RESPONSE:

   Edwina called Don Wall and was advised that the feds want all closed cases. However, counties do not have to go back and add closed cases to the consortia system that did not convert from their legacy system.

   11/6 PAG – We will need to include the entire universe. LCSA 00-003 is incorrect.

3. Based on the instructions in the ACF letter, DC-00-77, this question concerns reporting line 6: Children in IV-D cases open during or at the end of the fiscal year with paternity established or acknowledged. The state reports this line by taking what the counties report on a quarterly basis and adding them up to come up with the number. A problem arises when this situation occurs:

   1st quarter: child is reported as having paternity established during the second quarter (or anytime during the fiscal year), the order is vacated or set aside and the FS office is required to do blood testing. What this means is that the paternity that was established is overturned. 3rd quarter: FS office gets the results of the blood tests and he is determined to be the father and a paternity judgment is entered against him. This is reported as a paternity established in the 3rd quarter. The state has no way of knowing that this child had paternity reported twice. The question is: for the audit trail, do I only report the child as an unduplicated count or do I report it twice. If I report it as unduplicated, then the counts won't match what the state has reported. If I report it twice, then that's is bad data. Just let me know which way to go on these and we will get it done.

   RESPONSE:

   This issue has been clarified in subsequent CS 155, 156, and 157 instructions, which instruct to add paternity establishment and subtract when paternity is overturned as for the applicable quarter.

11/6 PAG – Recessions and set-asides should be subtracted from Section B of the report for the applicable report period. A footnote will be added to the annual table (CS 156) stating "This reflects rescissions and set asides."

Consortia leads will need to generate a separate log of children for which paternity was established in the courts and subsequently were determined to have a POP declaration on file. Consortia leads can do this by matching the POP declaration CD against the statewide database.

ARS - can provide
BEST – need to generate an exception report
CASES – can provide
KIDZ – can provide
STAR/KIDS - ???
CHASER – unknown

For purposes of submitting quarterly and annual reports, counties:

1. Will not create a log of rescinds or set-asides
2. Record just services for quarter
3. Report will include a footnote explaining that the net figure takes into consideration negative set-asides.
4. The numbers from the quarterly report will not be added together to make the annual report.
5. For orders not established, report paternity established and as an order not established. If an order has been established, county will generate an exception report. Don't deduct, but run an exception report.

4. We need to have a file format for the "Audit Master Case List". The attachment to the Federal "Dear Colleague" letter is not adequate.

   RESPONSE:

   Mike Graham is providing an exemplar to be distributed at today's 11/6 PAG meeting.

   11/6 – Mike provided an exemplar.
   Update – Exemplar has some problems. Revised version was released on 11/15.

5. The requirement to provide statistics for both the State fiscal year and the Federal fiscal year needs to be reconsidered. While this can be done, it requires significant programming changes to assure that each report gets the correct data. What purpose does this serve and is it worth the cost? Further, you have the State using one set of numbers and the Feds using different numbers to evaluate the program. What requires this reporting?

RESPONSE:

We must conform to the legislation mandating the quarterly and annual State and federal fiscal year reporting requirements required by both the State and the feds. We recognize the additional effort this entails, however, we are still required to provide this information. DCSS is reviewing state and federal requirements to determine if there is some discretion for reconciling federal and state reporting mandates to alleviate this concern.

6. Eliminate the requirement to count cases differently for the State reports vs. the Federal reports (counts regarding welfare cases that are non-federal). This requirement will mean two sets of statistical program code. Also, we count activities as they occur and we cannot go back and retroactively recreate these counts. With everything else we are working on, including converting Fresno county, we would not be able to begin programming on this until January with code possibly ready in March, which is 9 months into the State FY and 6 months into the Federal FY. Until there is a Statewide system, only Federally mandated changes should be required.

   RESPONSE:

   Again, the State must conform to the legislation mandating State and federal reporting requirements.

Questions regarding the new CS155 (state quarterly)/CS156 (state annual) /CS157 (fed annual):

#	Source of Issue	Issue / Concerns / Comments
7.	CS155/CS156 headings	CS155 form: form heading should have the word 'STATE' in the title. The word STATE on both CS155/CS156 should be larger and in bold since all three forms look so similar **Response:** The State will make the requested change
8.	All forms instr: page 3 para 5	Form number references incorrect, should be CS155, CS156 and CS157 **Response:** This change has already been made
9.	All forms inst: page 3	Are we to count Non Federally funded CalWorks two-parent cases only or **all** Non Federally funded CalWorks cases as never on the federal report CS157? **Response is from the 11/6 memo from Sandra Poole to Edwina Young. The source for the responses are in OCSE-AT-99-15, and were further discussed with Elise Wing of Region IX.**

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		Response: All non-federally funded cases are reported as never assistance on the CS 157. **Statement:** Federal and non federal CalWORKs cases will be reported as current/former assistance on the state forms CS 155/156, but as never assistance on the federal form CS 157. **Additional Response:** However, if a case is receiving State Only Assistance, and at least one member of the family has ever received federally funded assistance, the case should then be reported as former When reporting on the State CS155/CS156 the case should be reported as current or former. The cases should be reported in the status of current, former, or never as they are on the last day of the quarter for which the report is due.
10.	All forms inst: pg 3 para 4	Fed and Non Fed Calworks case will be reported as Current/former on State forms CS155/ CS156 but Never on Fed form CS157. **Responses are from the 11/6 memo from Sandra Poole to Edwina Young. The source for the responses are in OCSE-AT-99-15, and were further discussed with Elise Wing of Region IX.** 1. What if the aid code is changed mid-qtr and went from state funded to fed funded or vice versa? **Response:** When reporting on the federal report, the case should be reported as current assistance if federal funding is currently provided. The case should be reported as former assistance if federal funding was provided in the past. When reporting on the state report, the case should be reported based upon its current status of current, former or never assistance. 2. For the federal report if the funding goes from Fed to Non Fed wouldn't this case be considered former not never? **Response:** The case should be reported as former assistance on the federal report (CS 157) if federal funding was ever provided. 3. For certain aid types, they had been federally funded previously, i.e. 35 aid. Should this be counted on the federal report as former not never? **Response:** The case should be reported as former assistance on the

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		federal report (CS 157) if federal funding was ever provided. 4. What if aid code changed mid-quarter? Do we count the case status at end of quarter but show money in all three current/former/never buckets? **Response:** The reporting of the money should be consistent with the reporting of the case for both the state and federal reports. When reporting on the federal report, the case should be reported as current assistance if federal funding is currently provided. The case should be reported as former assistance if federal funding was provided in the past. When reporting on the state report, the case should be reported based upon its current status of current, former or never assistance.
11.	CS155 Instr: pg 3 para 4	Is it possible that one case could have Fed CalWorks and Non Fed Calworks at the same time? It doesn't seem that IV-A would do this but I don't know. **Response is from the 11/6 memo from Sandra Poole to Edwina Young. The source for the responses are in OCSE-AT-99-15, and were further discussed with Elise Wing of Region IX.** **Response:** It is possible that one case could include some participants eligible for federal CalWORKs and others that qualify for only non federal CalWORKs. When this situation occurs, a case that is receiving or has received federal funding in the past should be reported as current or former assistance, whichever is applicable. .
12.	CS155 & CS156 Instr Pg 3-5	Page 3 – 5 instructions for both CS155 and CS156 look identical except for top of page 5 in bold: CS155: non-fed state-only two-parent cases (see FSD letter no. 99-23) CS156: non-fed KinGAP, non-fed state-only two-parent cases (see FSD letter no. 99-23) Both of these are in conflict with the language on page 3 and should be removed. **Response:** See response to issue 9. 11/6 PAG – For State-only foster care, always count the case. The instructions have been revised.
13.	CS155 Instr: Page 6, Sect A 4th para	What is meant by : 'County-to-county transfers of cases and multiple county involvement in cases within the state should not be reflected in case inventory counts? If we are enforcing current support in our county and another county has arrears owed to them how will we know not to count the case or know that we should count the case and the other county will not count the case. This is the duplicate case issue which has not really

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		been resolved. **Response:** To eliminate duplicate reporting when there are arrears only cases in one or more counties and the child is residing in another, the rule will be that the county who has responsibility for the current support obligation will report the case. How does a county with arrears only know when they should report the case? When the child is emancipated and there is no longer a current support obligation but there are welfare arrears the county with arrears should report the case on the CS 157 as a FORMER case. This does not answer the issue when there is more than one county that had a period of welfare arrears and the child is emancipated. However, it will reduce the number of duplicate cases reported. 11/6 PAG – For **intrastate** cases originating in California, once the current support and arrears obligation have been satisfied in the county collecting current support, the originating jurisdiction collecting arrears counts the case. For **interstate** cases, any California counties receiving interstate collections count the case – even duplicates. i.e., whoever is collecting counts the case.
14.	CS155 Instr: Pg 7, para 1	Exclude international cases. Should this be clarified to indicate foreign countries with no reciprocal agreements? **Response:** Yes, will be clarified to indicated foreign countries with no reciprocal agreements.
15.	All forms: Page 9 Section B + D	Is this correct: Fed CS157: include only children under 18 on line 4-10, and 13, and 16. Also include children that turned 18 within year. State CS155/CS156: continue to count all children regardless of age. Or do we exclude from both the Fed and State reports? **Response:** Report the children who were under the age of 18 on October 1 of the reporting year on the OCSE 157 (the federal report September 30 of each year). Children who reach age 18 during the reporting year can be reported. Report all children requiring services or children for whom services were provided on the CS155/CS 156 (the state reports) regardless of their age. 11/6 PAG – On the State reports (CS 155 & 156), continue to count

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		children as you always have. However, on the federal report (CS 157), identify and delete from all children counts all children over 18 years of age.
16.	CS155/CS156 Page 11, Sect D	Subtract any set asides and/or rescissions. Since these are point in time reports do we really want to count negatives? Do we subtract the counts if the Pat Estab was counted in the previous fiscal year? **Response:** Yes, negatives should be counted. Subtract the count even if the paternity establishment was counted in the previous FY. 11/6 PAG – See response to question #1.
17.	CS157 Instr: Page 12, #14	Number of IV-A cases closed with IV-D payment. We currently report this but with the Non Fed Calworks situation, do we count the case if there is no Federal participation? **Response:** No. Do not count the case if there is no federal IV-A participation. 11/6 PAG – This does not apply to State forms.
18.	CS157 page 12: CS155/CS156 page 11: Paternity established section	The state forms CS155/156 only wants the total count of Pat established and a subtotal for POP. The fed form CS157 wants 3 subtotals: 1, Pat estab for kids born outside of state 2, Pat estab by POP 3, Pat estab for kids born outside of state and estab by POP. Wouldn't the state want the same breakdown as the Feds? **Response:** No 11/6 PAG – Revisions will provide clarifications.
19.	CS157 line 17: CS155/156: line 12	Cases with support orders established. The instruction did not call for unduplicated counts but this is one place that may have duplicated counts (a case with support orders established in two different quarters) If we establish multiple court orders should the case be listed multiple times? **Response:** Yes, the case should be counted multiple times - see question #1.
20.	CS155/CS156 Page 14 & 15 Section F lines 22-25	Line 22: Do we count the case multiple times if the case went from never to current to former or do we count the case where it sits at the point in time? Line 23: This says unduplicated count but wouldn't that depend on the answer to line 22. Same issue for lines 24 and 25. **Response:** Count the case where it sits at the point in time.

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		11/6 PAG – Report the status of the case as it is at the end of the reporting period.
21.	CS155/156 Page 15 & 16:	Cases paying toward arrears: Now we have to report case counts by Current/former/Never, how should we report the case if it went through several status during the quarter or year? Should we count based on its status at end of the quarter or year and only count 1? **Response:** Count based on the status at the end of the reporting period. The 2nd paragraph on page 16 makes it more confusing. If a case is Former but the payments were recouped (PLDC or user adjustment) instead of sent to the family, do we drop the case? **Response:** The case should be dropped because there was no payment on arrears. Also, we can have a case that was Never and had payment paid to CP, and just turned Current at end of quarter but no $ was recouped. Should we drop this case under this definition? **Response:** Yes, the case should be dropped because there was no payment on arrears. 11/6 PAG – See question #22 for clarification on IRS intercept collections on arrears.
22.	CS155 Page 15 CS156 Page 16	The final statement on these pages says Do not count the cases if the collection was an IRS tax intercept, since it must be applied to welfare recoupment first. This is in conflict with the other instructions on this line item. If the case is Never current support with never arrs and IRS payment is applied to Never arrs, why would the case not be counted. In a former case, it the IRS payment satisfied the wel arrs and some money was paid to the family, why would this not be counted? **Response:** Note – the OCSE 157 line numbers referred to in the answer below directly correspond to the new CS 157 (10/00) line numbering schema. The instructions for OCSE-157, Line 18 state that you may count cases in which the payment received is the IRS tax intercept as Cases with Collections during the fiscal year. Furthermore, for Line 29, you may count such cases in certain

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		instances. Please refer to AT-99-15, Question 22 and the instructions for Line 29 for all instances in which you may count cases. I believe your question refers to former assistance cases. In such cases where there are welfare arrears and also past due support owed to the family AND the IRS intercept exceeds the welfare arrears so that some money is paid to the family, the case should be counted on Line 29. The State cannot count this case if there are no funds left for the family after the welfare arrears are satisfied (that is, there are no "excess" IRS intercept funds). 11/6 PAG – Helen to get clarification from OCSE on IRS collections that get distributed to welfare arrears only. 11/22 Federal Clarification –The following questions were prepared and submitted to Region IX for clarification (question 22 of AT-99-15 was used as a guide for the federal response). This should provide guidance to counties regarding how to count those cases where the only collection was an IRS tax intercept: 1. The only time an IRS intercept only case cannot be included as a case paying towards arrears, would be a former assistance case, and NO money was paid (or owed) to the family? Answer: In this case you need to differentiate between former assistance cases where past due support is owed to the family and those cases where past due support is NOT owed to the family. In former assistance cases, if past due support is owed to the family, but they do not receive any money because the IRS intercept is used to pay welfare arrears first and there are insufficient funds left for past due support owed to the family, you cannot count the case. If no past due support is owed to the family and an IRS intercept is made and used to pay welfare arrears, you may count the case. 2. Never and current assistance cases with only an IRS intercept are included as paying cases because in both cases, the money went to either the family or to the state or both? Correct? Answer: For never assistance and current assistance cases where the only collection made is an IRS intercept and the money collected went either to the family (never assistance cases) or the State (current assistance cases), you may count these cases as paying toward arrearages.

23.	CS156 page 18	28a – f column two. This asks for the Salaries and benefits for all FTE's for each classification listed, during the state fiscal year. Is this asking for the actual salary and benefits for the entire year based on the FTE's on last working day of June or is this just a calculation that is multiplying the FTE's by the salary/benefits per month to come up with an annual figure. **Response:** The figure should be the actual salary and benefits for the entire year.
24.	CS157 page 2	"Counties are required to have quarterly detail documentation to support counts and amount on CS157. Since 157 is an annual report would we just want the annual documentation that supports the Cs157. **Response:** The instructions have been revised to state "annual detail" rather than "quarterly."
25.	OCSE AT99-15 dated December 22, 1999 – Q&A's	For these sections, instructions should include the clarification provided by the Feds **Section B – Paternity Establishment** Question and Answer 7: We should be excluding children with a deceased parent unless paternity is established for the child. Question and Answer 8 : We should be excluding children in cases found to have good cause. **Section C -Services required** We are no longer required to report cases requiring location services. However, based on question and answer #13 we should be counting locate cases requiring order establishment in this section. **Response:** The requested clarifications will be added.
26.	CS800/820	This question has to do with reconciliation between what we report to the Feds on the CS157 and what is reported on the 800. The 800 will have reported out the non fed CalWorks cases on either the 800 for current assistance or the 800 for former assistance. Since the cases reported here would be reported on the CS157 as never, there could be no reconciliation done between the reports. The Never cases and dollars are reported on the CS820. **Response:** The State will be addressing this issue through the establishment of the Office of Research and Program Design within CDSS.

OTHER DISCUSSION ITEMS

Jim Mohler expressed the need to have a sub-group work on requirements definition for the programming changes necessary to implement the new CS 155, 156 and 157 reporting requirements. The purpose is to ensure the consortia leads program the changes

consistently. Evan Auberry will facilitate a requirements definition sub-group consisting of technical leads from the six consortia and appropriate representation from DCSS Policy.