SEP - 6 2019

Tim Mose
Director, Child Support Services Division
Department of Social Services
3150 Harden Street Ext.
Columbia, SC 29202

Dear Mr. Mose:

It is with great pleasure that we unconditionally grant a full certification to the Palmetto Automated Child Support System (PACSS). We commend South Carolina on meeting the Family Support Act of 1988 (FSA-88), and the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) statewide child support systems requirements.

Enclosed is our report of the results of the Level I and Level II certification reviews. The new PACSS system offers a significant improvement in automation and functionality over and above the legacy child support enforcement systems. As you can see from the report, all certification findings have been closed.

There are two areas that OCSE will continue to monitor: (1) the development and implementation of the automated interface with the South Carolina Title XIX agency and (2) the enhancement of PACSS to include Administrative Enforcement Interstate functionalities. We will require South Carolina to provide updates to these two areas during our regular monthly calls with your office and in your Annual Advance Planning Document Update submissions.

Again, we offer our most sincere congratulations to you and all those involved in this significant achievement. Your team did an outstanding job during our functional and statewide reviews. Your level of preparation for our review was exceptional. Please thank the staffs of CSSD, Central and Regional Offices of the Department of Social Services, Clerk of Court county offices, State Disbursement Unit, State Data Center, and the disaster recovery site.

If you have any questions regarding our certification, please contact Raghavan Varadachari at (202) 260-5478.

Sincerely,

Scott M. Lekan
Commissioner
Office of Child Support Enforcement

Enclosure

Reference: SC20190905

cc: Calvin Mitchell, Grants Officer, ACF/OGM
        Jacqueline Mull, OCSE Regional Program Manager, ACF/Region 4

SOUTH CAROLINA
PALMETTO AUTOMATED CHILD SUPPORT SYSTEM (PACSS)

FAMILY SUPPORT ACT OF 1988 (FSA-88)

PERSONAL RESPONSIBILITY AND WORK OPPORTUNITIES RECONCILIATION ACT OF 1996 (PRWORA)

LEVEL I CERTIFICATION REVIEW
January 14-18, 2019

LEVEL II CERTIFICATION REVIEW
August 19-23, 2019

Final Report
September 6, 2019

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

SOUTH CAROLINA PALMETTO AUTOMATED CHILD SUPPORT SYSTEM (PACSS)
FSA88 AND PRWORA CERTIFICATION REVIEW REPORT

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SOUTH CAROLINA PALMETTO AUTOMATED CHILD SUPPORT SYSTEM (PACSS)
FSA88 AND PRWORA CERTIFICATION REVIEW REPORT

1. PREFACE

The technical, administrative, operational, and management requirements for automated child support enforcement systems for the Family Support Act of 1988 (FSA-88) and the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), Public Law 104-193, enacted August 22, 1996 are defined in the Administration for Children and Families (ACF) publication, "Automated Systems for Child Support Enforcement: A Guide for States", revised in April 1999, December 1999, August 2000, June 2007, and December 2009. The guide also incorporates the functional requirements of the Deficit Reduction Act of 2005.

The guide provides specific requirements for automated child support enforcement systems and defines eight general areas of functional criteria these systems must support. These eight areas are case initiation, locate, case establishment, case management, enforcement, financial management, reporting, and security/privacy. An optional customer service functional area has been added to the guide that encourages the states, but does not require the states, to utilize the statewide child support enforcement (CSE) system to provide services and information to customers.

When a state's automated CSE system is redesigned and/or replaced, it must undergo a federal review for recertification of all functionality for compliance with both FSA-88 and PRWORA. These certification reviews may be performed all at one time or incrementally with discrete items of functionality being reviewed at different times. ACF/Office of Child Support Enforcement (OCSE) reserves the right to re-review any FSA-88 or PRWORA functionality during any subsequent review, even if it has been previously approved. Full certification will be granted only when OCSE has verified that all FSA-88 and PRWORA requirements are met (also known as Level I certification), and that the complete, fully functioning system is installed and operational statewide in all political jurisdictions (referred to as Level II certification).

The findings and conclusions expressed in this report should not be considered as an opinion or judgment as to the state's ability to meet federal or state audit standards for child support enforcement program requirements. Though the automated system was tested through the use of case simulations, live case data, system documentation, test case scenario processing, and other forms of demonstration testing, not all system capabilities, limitations and/or defects can be identified through the limited volume of testing conducted as part of a certification review.

OCSE conducts data reliability and financial audits of state's child support programs to determine their compliance with federal laws and regulations governing the Title IV-D program. Automated child support systems, at all times, remain the responsibility of their respective states. These systems, developed with federal assistance and guidance, serve states in their endeavor to implement effective and efficient child support programs encompassing all relevant political jurisdictions and program components.

2. EXECUTIVE SUMMARY

On August 3, 2018, the South Carolina Child Support Services Division (CSSD) requested that the Administration for Children and Families (ACF), Office of Child Support Enforcement (OCSE) conduct a certification review of the South Carolina Palmetto Automated Child Support System (PACSS). OCSE is tasked to verify that PACSS meets the criteria for a child support enforcement system as defined at 45 CFR Parts 307.5(a), 307.10, and 307.11. In other words, that it meets all of the requirements contained in the Family Support Act of 1988 (FSA-88), and the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996.

ACF/OCSE conducted its FSA-88 and the PRWORA Level I certification review during the week of January 14-18, 2019 at the CSSD office in Columbia, South Carolina. The federal review team included computer systems staff from OCSE's central office in Washington, DC and a program specialist from the OCSE/Region 4 office. State representatives to the review included the Director of CSSD, CFS Project Chief, CFS Project Manager, Clerks of Courts of two counties, program management, subject matter experts, numerous members of the PACSS project team, and contract support staff.

The Level I review focused on a detailed examination of the system's functionality with respect to established criteria in OCSE's publication "Automated Systems for Child Support Enforcement: A Guide for States," as revised in April 1999, December 1999, August 2000, June 2007, and December 2009 (abbreviated as '2009 cert guide' below). The guide also incorporates the functional requirements of the Deficit Reduction Act of 2005. The review assessed the system in eight critical areas of functional comprehensiveness: case initiation, locate, case establishment, case management, enforcement, financial management, reporting, security/privacy, and the optional customer service functional area.

During the week of April 16-18, 2019, when conducting the routine IV&V review, the federal analysts of ACF/OCSE visited the central and regional offices of the Department of Social Services (DSS), as well as three Clerk of Court (CoC) county offices in Columbia region with respective caseload of 2,287, 9,836 and 25,547,[1] to observe the system in use. The federal team also visited the State Disbursement Unit (SDU), data center and disaster recovery site to observe and evaluate the federally mandated requirements listed in the 2009 cert guide are implemented.

ACF/OCSE conducted its FSA-88 and PRWORA Level I follow-up certification review and Level II certification review during the week of August 19-23, 2019. While numerous members of the PACSS project team, and contract support staff were present in the Level I follow-up certification review, state representatives were present in both reviews. The Level I follow-up review, conducted at the CSSD office in Columbia, was to verify that the findings resulting from the Level I certification review were remediated. The Level II review focused on an examination of the system's statewide implementation by visiting the DSS Central Office and Regional Office, as well as selected small, medium and large county offices in Charleston, Florence and

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[1] Caseload information as of January 2019, obtained from '201901 SC CFS January Monthly Status Report'.

Greenville regions, and observing the system in use. The caseworkers were asked to perform tasks that involved the various critical areas of functionality. In addition, the review team paid a visit to the SDU.

Findings of the federal certification team citing federal functional requirements not met by PACSS are provided in Section 4 of this report. Each finding is accompanied by a corresponding recommendation that, if implemented as described, should allow the state to fully address the respective deficiency noted. As previously stated, however, OCSE reserves the right to re-review any FSA-88 or PRWORA functionality during any subsequent review, even if it has been previously approved, and to cite additional deficiencies when found.

3. INTRODUCTION

The U.S. Department of Health and Human Services (DHHS), Administration for Children and Families (ACF), Office of Child Support Enforcement (OCSE) is responsible for promoting the development and implementation of comprehensive, automated Child Support Enforcement (CSE) systems nationwide. Based on statute as codified in federal regulations at 45 CFR 95.621 and 307.25, OCSE conducted a review of the operational compliance of the South Carolina Palmetto Automated Child Support System (PACSS) automated child support enforcement system with regulatory, programmatic, and operational requirements of the FSA-88 and PRWORA.

3.1 PROJECT BACKGROUND

In response to South Carolina's August 3, 2018, submission of their Child Support Systems Certification Questionnaire and Financial Test Deck results, OCSE notified South Carolina Child Support Services Division (CSSD) that it would conduct an FSA-88 and PRWORA Level I certification review of the PACSS system. OCSE conducted the review at CSSD office located at 1628 Browning Road, Columbia, SC 29210-6924, during the week of January 14-18, 2019. During the week of April 16-18, 2019, when conducting the routine IV&V review, the federal analysts of ACF/OCSE visited the Department of Social Services (DSS) Central Office and Regional Office, as well as three Clerk of Court (CoC) county offices in Columbia region. The federal team also visited the State Disbursement Unit (SDU), data center and disaster recovery site. Subsequently, OCSE conducted a Level I follow-up certification review at CSSD office, and a Level II certification review at the DSS Central Office and Regional Office, selected small, medium and large CoC county offices[2] in the remaining regions (Charleston, Florence and Greenville) and SDU during the week of August 19-23, 2019, to observe the system in use.

3.2 REVIEW METHODOLOGY

To assess the PACSS functionality is meeting FSA-88 and PRWORA system certification requirements, the review team:

- Evaluated the state's certification questionnaire, as submitted to OCSE on August 3, 2018;
- Observed and participated in demonstrations of PACSS functionality using live operational and production test versions of the application software, as appropriate, dependent upon whether live or test data was needed for verification and validation of the function in question;
- Conducted an evaluation of distribution processing through the use of OCSE's PRWORA financial distribution test deck, and the associated OCSE-34A collections report;

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[2] CoC county offices with caseloads ranging from as low as 1,266 to as large as 18,801.

Prior to the actual on-site visit, the review team collected and assessed existing technical and project management documentation, including the project's currently approved Advance Planning Document, and the state's certification questionnaire response. The review team also conducted conference calls with key project staff to determine and finalize the scope and methodology of the certification visit, as well as to establish expected outcomes.

Upon completion of the initial on-site certification review, review team members briefed state project and program staff on the preliminary findings of the review. After the on-site visit, the review team conducted further analyses of the project documentation gathered during, as well as subsequent to, the on-site visit portion of the review.

State staff representatives to the review included Tim Mose, Director of CSSD, Jimmy Earley, Project Chief, Jake Brewbaker, Project Manager, Clerks of Courts of two counties, program management, subject matter experts, numerous members of the PACSS project team, and contract support staff. The federal review team included computer systems staff from OCSE's central office in Washington, DC, as well as Regional Program Manager and program specialist from the OCSE/Region 4 office.

Level I Review Team	Organization
Dorothy Wan, Team Lead	OCSE Central Office
Gregory Jordan	OCSE Central Office
Dorothy Simmons	OCSE Central Office, Contractor
Demetricus Johnson	OCSE Region 4 Office

Level II Review Team	Organization
Dorothy Wan, Team Lead	OCSE Central Office
Dorothy Simmons	OCSE Central Office, Contractor
Jacqueline Mull	OCSE Region 4 Office
Demetricus Johnson	OCSE Region 4 Office

4. CERTIFICATION FINDINGS AND RECOMMENDATIONS

This exception-based report presents the following findings from the federal Level I certification review conducted on January 14-18, 2019. Only those South Carolina PACSS functions that did not meet or only marginally met the requirements for certification are cited herein. OCSE's recommendations for improvement or modification of PACSS, as well as any corrective actions taken by the state to-date (under the heading "Status") are provided, where applicable.

4.1   DEFERRED FUNCTIONALITIES AND INTERFACES WERE NOT AVAILABLE FOR REVIEW

Impacts Objectives
A-5.b.2, 6; D-7; D-8; D-9;
D-7.f;
E-2.q;
D-4.b.6, E-1.a.2, E-7;
E-15

Finding

Since the PACSS project team adopted a phased implementation approach to implement the system statewide in five phases/rollouts, interface with CSENet and functionalities pertaining to intergovernmental forms, eIWO, credit bureau reporting and interstate FIDM, though developed and tested, were deferred to be rolled out. During the Level I review, the review team was not able to review these deferred interface and functionalities because the phased implementation was still in progress. The PACSS project team indicated that interstate FIDM will be implemented in Region 2 rollout scheduled for February 4, 2019, intergovernmental forms, eIWO and interface with CSENet will be implemented when the system is statewide in early August 2019.

Recommendation

The deferred interface and functionalities need to be implemented as planned and be available to be reviewed by the review team. Upon review, if the interface/functionalities/impacted system objectives do not meet federal requirements, the review team will open more findings.

Date Opened

January 14 – 18, 2019 Review

Update (February 14, 2019)

On January 24, the state sought guidance from OCSE with regard to CSENet implementation approaches. The state planned to begin transmitting and receiving information with other states

through CSENet beginning in August of this year when the new child support system is statewide. At the point when the system is statewide, are they required to be able to transmit/receive information with all of the states that uses CSENet? Or, can they start with a handful of states and adding the others over a period of time? On February 14, Division of Federal Systems of OCSE responded, recommending that they agree with South Carolina's approach to do incremental implementation with states. This minimizes risk for South Carolina and work for the receiving states.

State's Response (April 24, 2019)

We would like to clarify Section 4, item 4.1 of the draft report, specifically, the statement "that interstate FIDM will be implemented in Region 2 rollout." The MSFIDM (or Multi State FIDM) requirements are currently operational in PACSS. The State considers that MSFIDM is the matching with the Family Case Registry (FCR) for large multi-state banks. In-state FIDM is the matching with smaller in state banking institutions done for South Carolina via the Interstate Data Exchange Consortium (IDEC). This "in-state" functionality become operational following the implementation of SC DSS Region 2 on April 1, 2019.

Update (May 2, 2019)

The deferred functionality 'interstate FIDM' included in Finding paragraph above should be 'in state FIDM'. The word 'interstate' is a typo.

State's Response (July 29, 2019)

CSENet/Intergovernmental Forms Objectives – Requirements D-7 to D-9

The State of South Carolina initiated CSENet processing with the State of Georgia on July 1 and with the States of West Virginia, Minnesota and Missouri on August 1. As discussed during the OCSE Level I visit, CSENet capabilities were designed, developed and tested, but implementation was delayed until later in the PACSS rollout schedule. PACSS is functioning as designed; however, in reviewing the Narrative responses, we determined that several statements in Objectives D-7 through D-9, needed to be revised. The updated PACSS Federal Certification Narrative can be viewed by double-clicking on the icon below.

PDF
4.1 Objectives
D-7-D-9.pdf

eIWO Objective - Requirement E-2 q

The State of South Carolina initiated eIWO via PACSS on July 5, 2019. As this was an enhancement, the PACSS Federal Certification Narrative was updated and can be viewed by double-clicking on the icon below.

[PDF] 4.1 eIWO Objective E-2.q.pdf

Credit Bureau Reporting Objective - Requirements D-4 b.6 and E-7

The State of South Carolina initiated Credit Bureau Reporting (CRA) via PACSS on July 1, 2019, in conjunction with the implementation of Region 3 (Florence). During the first week of August 2019, we anticipate forwarding the initial CRA file to Equifax. PACSS CRA processing was designed, developed and tested with this functionality, but it was not implemented until a majority of the State was converted to the new system. The Narrative response for Objectives D-4 b.6 and E-7 may be viewed by double-clicking the icons below.

[PDF] 4.1 CRA Objective D-4.b.6.pdf   [PDF] 4.1 CRA Objective E-7.pdf

In State FIDM - Requirement E-15

As indicated above (May 2, 2019), Multi-State FIDM was operational during the OCSE Level I visit. In State FIDM became operational in PACSS in conjunction with the implementation of Region 2 (Charleston) on April 1, 2019. PACSS FIDM processing was designed, developed and tested with this functionality and there were no deviations between the processing implemented and Narrative descriptions, so no changes to the existing Narratives were made.

Update (August 12, 2019)

OCSE followed up with the state regarding their narrative for CSENet/Intergovernmental Forms Objective D-9 a.2 requirement. OCSE asked whether PACSS uses 30 business days for the federal timer? 2009 cert guide says '30 days'. 2017 cert guide[3] says '30 calendar days'. 2017 guide has added clarification to 2009 guide.

State's Response (August 13, 2019)

State staff discovered this error a few weeks ago and created a bug to resolve the issue. The change to "30 calendar days" – instead of business days, is scheduled to be moved to our production system this week. The necessary coding changes have already been completed and tested.

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[3] "Automated Systems for Child Support Enforcement: A Guide for States" updated in 2017

Status (as of September 4, 2019)

Closed – During the review on August 19, the review team verified that CSENet interfaces with some states have been implemented. As of August 19, 2019, CSENet interfaces with GA, MN, MO and WV have been established. Interfaces with another 22 states have been confirmed to be implemented by October 1, 2019. The review team also verified that functionalities pertaining to the latest version of intergovernmental forms required by AT-17-01 (https://www.acf.hhs.gov/css/resource/omb-approved-standard-intergovernmental-cse-forms-december-2016), eIWO,[4] credit bureau reporting with Equifax[5] and in state FIDM are implemented. On August 27, 2019, OCSE also received updated narratives for objective D-8 c and D-9 a.2 requirements, reflecting 'calendar' day is used to calculate federally mandated timeframes.

4.2   ABSENCE OF AUTOMATED INTERFACE WITH TITLE XIX AGENCY
Impacts Objectives A-4; B-1.a.14; C-4.a, e; D-2.a, g; E-11.a, i

Finding

In South Carolina, the Title IV-D program is administered by the Child Support Services Division (CSSD) of the Department of Social Services (DSS) and the Title XIX program is administered by the Department of Health and Human Services (DHHS). PACSS does not have an automated interface with Title XIX's Medicaid Management Information System (MMIS). The PACSS project team explained that DHHS is in the process of modernizing their MMIS system. Although PACSS has the ability to generate automated 'batch' processes to accept an incoming file containing health insurance information from Medicaid and send a file containing PACSS member records to Medicaid, DHHS has elected not to create an automated interface with PACSS at this time for the relatively small number of child support referrals. Until an automated interface is in place, all paper referrals are handled manually and entered into PACSS by case initiation workers.

Recommendation

Manual process steps are not efficient and have potential risks. South Carolina is required to develop and implement the automated interface with the Title XIX Agency. If the state anticipates the automated interface, due to environmental/institutional constraint(s) beyond their

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[4] eIWO was implemented on July 5, 2019. As of August 19, 3,420 employers have signed up for eIWO.
[5] The interface with another credit bureau, Experian, has been designed and developed. The state has initiated discussion with Experian.

control, cannot be implemented by the time it executes its last phase of PACSS rollout scheduled for early August 2019, the state, at a minimum, needs to:

1) Provide a plan for developing and implementing the automated interface – a plan acceptable to OCSE. The plan needs to be submitted to OCSE by June 28, 2019.
2) Include the development and implementation of the automated interface as a project activity in future Advance Planning Document submission(s).

Date Opened

January 14 – 18, 2019 Review

Update (June 27, 2019)

The state submitted the following documents which were developed in collaboration with DHHS:

- Solutions Plan
- Project Schedule
- Initial Draft of the Test Plan

Update (July 25, 2019)

On July 24, OCSE had a conference call with the state to go through the comments and questions that OCSE had with the documents that the state submitted on June 27. OCSE identified couple action items for the state and, on July 25, requested the state to submit an updated Solution Plan by August 23, 2019. During the July 24 call, the state made a commitment that they will include the development and implementation activities of the automated Title XIX interfaces as a project activity in future Advance Planning Document submission(s).

Update (August 23, 2019)

The state responded to the action items given by OCSE on July 25 and provided clarification to the questions that OCSE had. The state also submitted an updated Solution Plan.

Status (as of September 4, 2019)

Closed – The state's plan for developing and implementing the automated interface is acceptable to OCSE. The state also included activity "Complete work on required system interface with SCDHHS (Title XIX agency) to comply with certification finding 4.2" in their FFY 2020 Annual Advance Planning Document submitted to OCSE on July 31, 2019.

4.3 MISSING SSNs OF SOME NCPs IN CONVERTED NON IV-D CASES IMPACTS INCOME WITHHOLDING

Impacts Objectives A-8.a.1; D-4.a, b.7; E-1.a.2; E-2

Finding

For the non IV-D cases converted into PACSS, the social security numbers of some non-custodial parents (NCPs) are missing. On August 17, 2018, OCSE advised the state that they "must include NCP's SSN on income withholding orders. Employers will not process IWOs without that information." During the Level I review, PACSS project team provided statistics drawn from the cases converted into PACSS from the four counties of the Pilot rollout, showing as of January 17, 2019 there were 17 NCPs with no SSN with an income withholding process started.

Recommendation

For the purpose of income withholding, the state needs to make sure that the SSNs of NCPs of non IV-D cases are in PACSS.

Date Opened

January 14 – 18, 2019 Review

State's Response (July 29, 2019)

In response to this Finding, the State initiated an Enhancement Request (ER00047) to require NCP SSN (ITIN) to generate an IWO. Alerts were also added if: the IWO Notice fails due to the lack of this data (edit) when a Source of Income is added, and the IWO chain cannot start; or, the Termination IWO Notice fails to generate from closing the IWO chain. The modified testing was completed, tested and was implemented in production on July 3, 2019. The narrative responses for these requirements (A-8 a.1; D-4 a, b.7; E-1a.2; E-2) may be viewed by double-clicking the icon below.

📄 PDF	📄 PDF	📄 PDF
4.3 SSNs Objective A-8.a1.pdf	4.3 SSNs Objective D-4.a.pdf	4.3 SSNs Objectives E-1 & E-2.pdf

Update (August 19, 2019)

With the completion of the statewide rollout of PACSS, there are 46 NCPs on wage withholding with missing SSN.

State's Response (August 27, 2019)

Of the 46 NCPs with missing SSN, 9 of these missing SSNs have been added. Approx. 21 of the remaining NCPS are candidates for a member merge. Using agency resources (filed documents and CLEAR system) CSSD was unable to find an SSN for the balance of the 46 NCPs. CSSD will complete member merges and SSN updates by close of business on August 28th. Per agency policy, if an SSN cannot be found, CSSD will end date the employment in PACSS.

State's Response (August 29, 2019)

Of the 46 missing SSNs for NCPS on wage withholding:
- Nine (9) SSNs were found and added to the respective NCPs last week.
- Twenty one (21) member merges were identified and have been completed.
- After researching our files (including document management) and reaching out to the listed employers, we were unable to identify a SSN for the remaining sixteen (16) NCPs. We have end dated the employer records for these members. This would close the Wage Withholding chain/workflow in PACSS. Any payments that are coming in would not be interrupted. These payments would be posted in PACSS and disbursed. And, if any of these NCPs do not pay, their names will appear on the Clerk of Court list to be ruled into court. NCPs on wage withholding are now exempt from being ruled into court. Wage withholding is one of several enforcement options that can be re-established if current information is obtained through this Rule to Show Cause (RTSC) process.

Status (as of September 4, 2019)

Closed – The state has exhausted available means to recover the 46 missing SSNs of the NCPs of the non IV-D cases converted into PACSS from the 46 counties' CoC legacy systems. 30 of them have been resolved. The state does have agency policy and processes in place to ensure that the remaining 16 NCPs will continue to pay their child support payments.

4.4   DATE TO RE-SEEK AN ORDER IS MADE AS AN OPTION
Impacts Objective C-2.g

Finding

According to the certification questionnaire provided by the state, "when the court dismisses a support order petition without prejudice, PACSS records the information in the establishment workflow and generates a case journal entry. The authorized worker who enters the dismissal order has the option to enter a reseek date. The system alerts the primary case worker when the reseek date is reached." According to the 2009 cert guide requirement, the IV-D agency <u>must</u> determine a date to re-seek an order. Thus, entering a date to re-seek an order is not an option. The state indicated that they have a number of case dismissal reasons that, at a practical level,

would not require the entry of a date to re-seek an order, such as "NCP Deceased", and it does not make sense in scenario like this to enter a date to reinitiate action to obtain a support order.

Recommendation

For cases where dismissal reasons make sense and re-seeking an order is practical/appropriate/beneficial, a date to re-seek an order must be entered for each of these cases, and, based on the re-seek date entered, PACSS must automatically reinitiate action to obtain a support order at that time.

Date Opened

January 14 – 18, 2019 Review

State's Response (July 29, 2019)

In response to the Finding for Objective C-2 g, the State initiated two Enhancement Requests (ER00049 and ER00131) to ensure a date to re-seek an order is entered and, based on the re-seek date entered, that PACSS automatically reinitiates action to obtain a support order at that time. The IV-D agency also modified the date to re-seek an order from 55 to 90 days.

Although the processing is fundamentally the same, ER00049, which addressed this functionality for Administrative Orders, was designed, tested and placed in production on June 14, 2019. ER00131, which addresses this functionality for Judicial Orders, was placed in production on July 25, 2019. The narrative response for the Administrative re-seek, as well as the Judicial re-seek, processes may be viewed by double-clicking the icon below.

PDF
4.4 Re-Seek
Objective C-2.g.pdf

Status (as of September 4, 2019)

Closed – During the review on August 19, the review team verified that when the system process to establish an order is closed without establishing an order, PACSS generates a Case Journal entry which includes the closure reason and logs a 90-day timeframe from the closure date. PACSS will automatically reinitiate action to re-seek an order and alert the case worker when the 90-day timeframe is reached.

4.5   GUIDELINES CALCULATION IS NOT ENTERED/LOGGED IN THE CASE JOURNAL

Impacts Objective C-3 b

Finding

In establishing an order, the system must use the state's approved child support guidelines to automatically calculate the support obligation amount. While the calculation is automatically calculated, it is not entered/logged in the Case Journal in PACSS.

Recommendation

Every time when a calculation is done, the calculation needs to be automatically entered/logged in the Case Journal.

Date Opened

January 14 – 18, 2019 Review

State's Response (July 29, 2019)

PACSS Guidelines processing was designed, developed and tested with this functionality. However, during our OCSE Level I presentation, a system problem was detected in that PACSS did not create case journal entries each time the Guidelines were calculated for a child support case. This was identified as Bug 67865. This issue has been corrected and PACSS functions as designed – recording when a guideline calculation is done automatically in the Case Journal. Since there were modifications to PACSS, the Narrative was revised and can be viewed by double-clicking the icon below.

[PDF icon] 4.5 Guidelines Objective C-3.b.pdf

Status (as of September 4, 2019)

Closed – During the review on August 19, the review team verified that after the support obligation amount is automatically calculated, the calculation is automatically entered/logged in the Case Journal.

4.6 ADMIN REVIEW OF FEDERAL TAX REFUND OFFSET: 10-DAY TIMEFRAME TO PROVIDE INFORMATION TO THE STATE WITH THE ORDER IS NOT BASED ON 'CALENDAR' DAYS

Impacts Objective E-3 h 1

Finding

Within 10 days of the non-custodial parent's request for an administrative review in the State with the order, the submitting State must provide the State with the order all necessary information. According to the guidance given by Division of Policy and Training of OCSE, the 'days' mentioned in this objective should be interpreted as 'calendar days.'. PACSS calculates the days based on 'business days.'

Recommendation

PACSS needs to be modified so that the 10 days' timeframe is calculated based on <u>calendar</u> days.

Date Opened

January 14 – 18, 2019 Review

State's Response (July 29, 2019)

The PACSS Tax Offset processing timeframes were designed, developed and tested with the required functionality.   However, during our OCSE Level I presentation, a problem was detected with our use of "business" days, which was identified as Bug 67803. This problem has been corrected and PACSS now utilizes the correct (calendar) timeframes. Since the timeframes were changed, the Narrative was modified and appears below. To access the corrected narrative, please double-click the icon below.

PDF
4.6 Timeframes
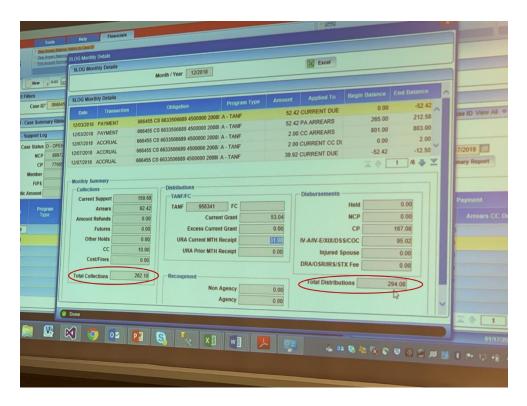Objective E-3.h.1.pdf

Status (as of September 4, 2019)

Closed – During the review on August 19, the review team verified that the 10 days' timeframe is calculated based on calendar days.

4.7   DISCREPANCY WITH COLLECTION AND DISTRIBUTION AMOUNTS

Impacts Objective F-5 a

Finding

When reviewing the financial management functionalities, the review team noticed a case having discrepancy with its total collection and distribution amounts as shown in the following screen shot:

PACSS project team indicated that it is a display bug.

Recommendation

The state needs to resolve the bug.

Date Opened

January 14 – 18, 2019 Review

State's Response (July 29, 2019)

PACSS processing to display collections and distribution amounts was designed, developed and tested with the required functionality.   However, during our OCSE Level I presentation, a

system problem was detected - two of the amounts displayed were not in synch. This was identified as Bug 67747. This problem has been corrected and PACSS correctly displays all financial balances. Since the system now functions as designed, there were no modifications to PACSS; the original Narratives remain correct.

Status (as of September 4, 2019)

Closed – During the review on August 19, the review team verified that the discrepancy with the total collection and distribution amounts has been resovled.

5. MANAGEMENT FINDINGS AND RECOMMENDATIONS

The following recommendations are not considered certification issues. However, the state should consider these findings and their related suggestions as they affect the overall efficiency and/or effectiveness of the PACSS system and as such, the IV-D program overall.

5.1 LOTTERY INTERCEPT IS DEFERRED TO BE ROLLED OUT

Impacts Objectives B-1.a, E-1.a.2, E-1.b

Finding

The functionality of lottery intercept was planned to be rolled out as part of the Region 2 rollout. During the Level 1 review, the review team was not able to review the functionality.

Recommendation

Lottery intercept is not an enforcement action required by either the 2009 cert guide or its updated version, "Automated Systems for Child Support Enforcement: A Guide for States" updated in 2017 (abbreviated as "2017 cert guide" below). Since the intercept is a valuable means of enforcement, the state is recommended to implement it.

Date Opened

January 14 – 18, 2019 Review

State's Response (July 29, 2019)

The State of initiated the intercept of winnings from the South Carolina Educational Lottery via PACSS on April 1, 2019, in conjunction with the implementation of Region 2 (Charleston). The PACSS Lottery Intercept was designed, developed and tested with this functionality, but the processing was not initiated until later in the implementation roll-out. The narrative response for this requirement may be viewed by double-clicking the icon below.

Finding 5.1 Lottery Objective B-1.pdf   Finding 5.1 Objective E-1.pdf

Status (as of September 4, 2019)

Closed – During the review on August 19, the review team verified that lottery intercept with the South Carolina Educational Lottery is implemented.

5.2   INCOMING IV-A REFERRAL DATA IS MANIPULATED DURING CASE INITIATION

Impacts Objective A-2 d

Finding

During the process of creating a child support case from a pending IV-A referral, system errors are generated if the information received from the referral for the question 'Does the NCP have a police record' is 'Yes' – but other mandatory information required by PACSS for the same question is missing due to the unavailability of such information in the incoming referral data. In order to by-pass the errors, the case worker does a workaround by manually overriding the 'Yes' answer to 'No', entering notes in the Case Journal, and then following up with the IV-A agency. The referral information of whether the non-custodial parent has a police record is not required by either the 2009 or 2017 cert guide.

Recommendation

Manipulating incoming factual data may cause future confusion and thus is not recommended. The PACSS project team needs to enhance the system code, such that the unavailability of information from the referral will not stop a case from being created – and at the same time, a system alert will be generated to alert the case worker, prompting him/her to take appropriate steps. If possible, the state is also recommended to work with the IV-A agency to enhance the data elements requirements for the referrals.

Date Opened

January 14 – 18, 2019 Review

State's Response (July 29, 2019)

In response to this Finding the State of South Carolina initiated an Enhancement Request (ER00048) to allow workers to process partial information received from the IV-A and IV-E interfaces during the IV-D case initiation process. The State's requirements were defined and PACSS was modified to insert incomplete information into the case record, reducing the need for data manipulation. After State testing, PACSS processing associated with this ER was

implemented on May 23, 2019. The Fed Cert Narratives for Objectives A-2.d and A-3.d were updated and appear below. To view the Narratives, please double-click on the icons below.

5.2 Incomplete Referral Objective A-2   5.2 Incomplete Referral Objective A-3

Status (as of September 4, 2019)

Closed – During the review on August 19, the review team verified that PACSS is able to process partial information pertaining to the question 'Does the NCP have a police record' received from an incoming IV-A referral, and generate an information alert to the case worker.

5.3   AN INTERSTATE CASE IS IDENTIFIED AS AN INTERNATIONAL CASE
Impacts Objective A-5.d

Finding

When reviewing the case initiation functionalities, the review team noticed an interstate case, in which both custodial and non-custodial parents have U.S. addresses, was incorrectly labelled as an 'international' case due to manual data entry error.

Recommendation

PACSS must perform more thorough data check to mitigate the risk that an interstate case is incorrectly categorized due to manual data entry error and thus is not processed appropriately. If the check identifies a data discrepancy, the caseworker should be prompted with an error message, and the case should not be created until the discrepancy is resolved.

Date Opened

January 14 – 18, 2019 Review

State's Response (July 29, 2019)

In response to this Finding, the State of South Carolina initiated an Enhancement Request (ER00050) for PACSS to display a warning message if an incoming case is created and the intergovernmental indicator is set to Responding International, PACSS displays a warning message if the CP address is not an international address, , "NCP/ DOES NOT HAVE A FOREIGN ADDRESS CONTINUE? YES/NO." If a South Carolina case is created and the intergovernmental indicator is set to Initiating International, PACSS displays a warning message if the NCP address is not an international address, "NCP/ DOES NOT HAVE A FOREIGN

ADDRESS CONTINUE? YES/NO." PACSS also displays a warning message in the screen status bar (tray) that states: "Out of State IV-D Agency: INVALID OOS AGENCY FIPS."

The State determined that using error/warning messages was the best alternative for the worker, as prohibiting this address combination outright would prevent certain legitimate cases from being established.

The State's requirements were defined and PACSS was modified to display the warning message when PACSS is presented with the case details described above. After State testing, PACSS processing associated with the ER was implemented on May 7, 2019. The Fed Cert Narratives were updated and appears below. To view the Narrative, please double-click on the icons below.

[PDF]
5.3 International
Objective A-5.d.pdf

Status (as of September 4, 2019)

Closed – During the review on August 19, the state demonstrated that PACSS is able to generate system alert prompt and error message when it detects an error during case worker's data entry process. The system alert prompt and error message do help mitigate the risk that an interstate case is incorrectly categorized due to manual data entry error and thus is not processed appropriately.

5.4 CASES HAVING FAMILY VIOLENCE INDICATOR AS 'YES' ARE NOT VISUALLY HIGHLIGHTED

Impacts Objective A-7.d

Finding

PACSS does maintain information that indicates whether a participant is subject to family violence. However, a case with Family Violence Indicator as 'Yes' is not visually highlighted to draw case worker's attention.

Recommendation

Cases with Family Violence Indicator as 'Yes' should be highlighted through visual mechanism to draw case workers' attention.

Date Opened

January 14 – 18, 2019 Review

State's Response (July 29, 2019)

In response to this Finding, the State of South Carolina initiated an Enhancement Request (ER00011) to highlight the Family Violence Indicator (FVI) displayed on PACSS when the FVI is set to "Yes." The State's requirements were defined and PACSS was modified to highlight the FVI displayed on PACSS screens when the indicator is set to "Yes." After State testing, PACSS processing associated with this ER was implemented on May 9, 2019. The Fed Cert Narratives were updated and appear below. To view the Narrative, please double-click on the icon below.

PDF

5.4 FVI Objective
A-7.d.pdf

Status (as of September 4, 2019)

Closed – During the Level I follow-up review (on August 19) and Level II review, the review team verified that cases with Family Violence Indicator as 'Yes' are highlighted in yellow.

5.5   LACK OF AUTOMATIC INTERFACES WITH ELECTRONIC COMMUNICATIONS AND INTERNET SERVICE PROVIDERS

Impacts Objective B-1.a

Finding

The system must have automated interfaces with Federal, State, interstate, and intrastate sources, when appropriate, feasible and cost-effective to facilitate obtaining and verifying case information.
Though not being mentioned in the 2009 cert guide, electronic communications and internet service providers are included in the 2017 cert guide as interfaces that a child support system should interface with.

Recommendation

Where appropriate, feasible and cost-effective, the state is highly recommended to implement automatic interfaces with electronic communications and internet service providers in order to facilitate obtaining and verifying case information.

Date Opened

January 14 – 18, 2019 Review

State Response (July 29, 2019)

In response to this Finding the State of South Carolina initiated an Enhancement Request (ER00009) to establish automated interfaces with Verizon and Sprint to obtain information (address information and/or cell phone numbers) regarding their Electronic Communications customers (cell phone and Internet) who are included in Title IV-D cases. The State's requirements were defined, and the interface files were developed. After State testing, PACSS processing associated with the ER will be implemented on July 30, 2019. The Fed Cert Narrative was created and appears below. To view the Narrative, please double-click on the icon below.

5.5 Internet Objective
B-1.a.pdf

Status (as of September 4, 2019)

Closed – During the review on August 19, the review team verified that interfaces with Sprint and Verizon are implemented.

5.6   LACK OF ADMINISTRATIVE ENFORCEMENT INTERSTATE (AEI)

Impacts Objective E-12

Finding

South Carolina does not pursue intergovernmental administrative enforcement at this time. AEI is an optional requirement in the 2009 cert guide.

Recommendation

AEI is a mandatory requirement in the 2017 cert guide. The state is highly recommended to enhance PACSS to include AEI functionalities.

Date Opened

January 14 – 18, 2019 Review

State Response (July 29, 2019)

In response to this Finding, the State of South Carolina initiated an Enhancement Request (ER00016) to design, develop, test and implement PACSS AEI processing, meeting the Federal

requirements included as Objective E-12 in the Updated 2017 certification guide. The State's requirements were identified, and we are waiting for the PACSS System Development Contractor's Impact Analysis to be completed. The development, testing and implementation of AEI processing will not occur until after the OCSE Level II visit during August 2019. In conjunction with the implementation of this processing, training materials and aids will be developed to facilitate staff use of this enforcement tool.

Status (As of September 4, 2019)

Open – This management finding remains open.