

CALIFORNIA DEPARTMENT OF CHILD SUPPORT SERVICES

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

Reason for this Transmittal

- State Law or Regulation Change
- Federal Law or Regulation Change
- Court Order or Settlement Change
- Clarification requested by One or More Counties
- Initiated by DCSS

August 12, 2003

CSS LETTER: 03-09

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

SUBJECT: QUALITY ASSURANCE AND PERFORMANCE IMPROVEMENT (QAPI)
 QUARTERLY ASSESSMENT PROCESS

Pursuant to Quality Assurance and Performance Improvement (QAPI) Manual requirements outlined in Chapter 8 – Improving Organizational Performance, Section IOP.1.4, the Department of Child Support Services (DCSS) is requiring local child support agencies (LCSAs) to conduct quarterly case reviews that validate compliance with case management requirements and at the same time, ensure the accuracy and reliability of reported data. The former is intended to meet State and federal self-assessment requirements, while the latter will evaluate and emulate the federal data reliability audit and resolve any issues that may arise as a result of these reviews. The intent is to combine these required activities into a management approach that will rectify problem areas early on in order to avoid a repeat of the intensive data reliability case review effort that occurred last year and meet federal self-assessment requirements in a more reasonable incremental manner.

Data Reliability ReviewsReview Process

DCSS expects the quarterly reviews for data reliability to include a comparison of all auditable lines previously reviewed by the federal auditors (lines 1, 2, 16, 24, 25, 28 and 29 of the CS1257, or CS457 for the first quarter) and newly added Lines 5 and 6 (more information below). LCSAs with a caseload of fewer than 10,000 must review 25 cases per quarter, while all other agencies must review 50 cases per quarter.



Consortium leads will pull a random listing of cases on a quarterly basis for review. For LCSAs with 50 cases to review, the consortia lead will pull 35 cases from line 1, 10 from lines 16 and 16b, and 5 from line 47. For LCSAs with 25 cases to review, the consortia lead will pull 15 cases from line 1, 5 from lines 16 and 16b, and 5 from line 47. Of those cases, at least 20 percent must include paternity establishment. If the random sample listing does not include the minimum number of paternity establishment cases, additional cases must be pulled until the minimum number of paternity establishment cases are reviewed. Line 47 cases are included for the compliance review to ensure cases are closed correctly. They should be reviewed for DRA purposes for any pertinent audit lines.

Due to the delay in issuing this letter, the first review shall include the first and second quarter of federal fiscal (FFY) 2003. To meet this requirement, LCSAs shall review a minimum of 25 or 50 cases for the first half of FFY 2003 and the same number for the third quarter (100 total for large LCSAs and 50 for small LCSAs). Consortia leads will generate a random list of cases for this initial review and will pull cases by the appropriate lines above for future quarters. Attachment 1 (parts a through e) includes a sample review form for all lines to be audited. Review forms do not need to be submitted to DCSS but should be maintained by the LCSA for audit purposes for at least two years after the date of the review.

DCSS expects verification that the review has been completed on a quarterly basis, with the first quarterly confirmation to be submitted no later than 45 days from the date of this letter. This confirmation should state that either no errors have been identified or if errors are found, verification that the errors have been corrected and any system issues addressed and corrected. A template for response [Quarterly QAPI Data Reliability Review – DCSS 0011 (07/03)] (in fillable PDF) is attached.

Addition of Lines 5 and 6 to the Data Reliability Audit

In a letter to “All State IV-D Directors” dated August 27, 2002, the federal Department of Health and Human Services (DHHS) transmitted information about Data Reliability Audit (DRA) Requirements for the FFY 2002 Reporting Period. In that letter, states were informed that the FFY 2002 DRA will examine all paternity indicator lines (5, 6, 8, and 9), irrespective of whether the state has elected to use the Statewide Paternity Establishment Percentage or the IV-D Paternity Establishment Percentage. The letter explained that the IV-D case status has been eliminated from the Child Support System Universe and the child’s Social Security Number has been eliminated from lines 8 and 9. In addition, the child’s date of birth was added for line 5 and the paternity establishment date is now needed for line 6.

Although DHHS began auditing Lines 5 and 6 during the FFY 2002 DRA, any findings will be used for management purposes only and will not impact incentives or penalties. However, beginning in FFY 2003 (October 1, 2002 through September 30, 2003), these

new reporting requirements must be implemented and will affect the outcome of the DRA. The specific data LCSA staff need to ensure is entered as follows:

Line 5
Child's Birth Date

Line 6
Paternity Establishment Date

Reporting Procedure

The data reliability review will be an ongoing quarterly review and the attached quarterly confirmation (Form DCSS 0011) is due no later than 45 days from the date of this letter, and then on the 45th day following the end of each quarter. As noted above, the first quarterly confirmation form will cover both the first and second quarter of FFY 2003.

Please forward your confirmation form to DCSS, attention: Heather Honey, Data and Performance Analysis Branch, MS 30, P.O. Box 419064, Rancho Cordova, California 95741-9064 or by e-mail to heather.honey@dcss.ca.gov.

Compliance Reviews

Under current State statute (Family Code (FC) Section 17702) and federal regulation (45 Code of Federal Regulations 308), compliance reviews have been conducted annually in each county using a representative sample of cases derived from a master case listing. LCSAs found out of compliance are required to take corrective action as a condition of continued State program funding. The findings from these reviews have also been used to demonstrate the State's compliance under the federal self-assessment regulations. It is the intent of DCSS, while continuing to adhere to State and federal requirements, to pursue changes in the review process to:

- 1) lessen the administrative burden on counties that are consistently at a high compliance level;
- 2) give greater attention to counties found out of compliance; and
- 3) coordinate compliance efforts with strategic plan and data reliability objectives.

To this end, DCSS is planning the following changes to be implemented within the next few months:

- 1) Case reviews for compliance will occur quarterly, using the sample of cases selected for the data reliability reviews described in this letter (a considerably smaller sample than currently reviewed annually).
- 2) The findings from one of the quarters (likely the quarter ending the federal fiscal year) will serve as the statewide sample for purposes of meeting the federal self-assessment reporting requirement.

- 3) LCSAs with a composite score of 90 percent or higher in the case review component of the compliance review will be exempt from the quarterly compliance reviews, except for the quarter used for the federal report. This target is based on the 90 percent compliance standard established in the State's strategic plan.
- 4) LCSAs scoring between 75 and 90 percent will be required to submit an action plan to achieve the 90 percent target and will continue with quarterly reviews until that target is achieved.
- 5) LCSAs found out of compliance (below 75 percent) in the case review component will continue to conduct quarterly reviews and be subject to an annual review, using a representative sample as is done currently. In addition, they will submit corrective action plans addressing specific areas of noncompliance and report progress until found in compliance.
- 6) Once every three years, all LCSAs will be subject to a full compliance review using a representative sample of cases as is done currently.
- 7) Other aspects of the current review process, such as expedited process and certain program administration questions, will continue to be addressed annually, during the quarter referred to in item 2) above.

As some aspects of this plan are contingent on the passage of Assembly Bill 738, which alters the wording in FC 17702, more detail will be forthcoming. Also, efforts will be made to maximize the use of the Compliance Review Tool for Child Support (CRTCS) in this process, as well as considering its eventual use in documenting the data reliability reviews.

QAPI Plan Progress Assessment

As LCSAs proceed with the implementation of their QAPI plans, it is expected that counties will conduct quarterly assessments of their progress in accomplishing tasks outlined in their plans. Each LCSA is expected to analyze their data, as well as the comparative data provided by DCSS, to ascertain whether implemented action plans are having the desired effect on performance targets or if mid-course adjustments are necessary, and identify new areas upon which to focus performance efforts. Although the submission of quarterly progress reports is not required, DCSS Quality Assurance Branch will be monitoring LCSA progress through ongoing contact and site visits.

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If you have any questions or concerns regarding the data reliability reviews, please contact Heather Honey at (916) 464-5080. For any other questions or concerns regarding this letter, please call Vic Rea at (916) 464-5464.

Sincerely,

A handwritten signature in black ink, appearing to read 'Donna S. Hershkovitz', with a large, stylized flourish at the end.

DONNA S. HERSHKOWITZ
Deputy Director
Child Support Services Division

Attachments

Data Reliability Review*
(October 1, 2002 through September 30, 2003)

LCSA _____ Date Of Review _____

Case Number _____ Case Name _____

**Audit area – OPEN CASES (LINE 1 of the CS 1257) AND OPEN CASES WITH
SUPPORT ORDERS ESTABLISHED (LINE 2 of the CS 1257)**

1. Was this case reported correctly? yes _____ no _____

2. Should this case have been reported as an open case? yes _____ no _____

3. Was a support order established prior to the end of the reporting period? yes _____ no _____

If the case was not reported correctly, what was the reason for the error and what action needs to be taken to correct it and prevent similar errors from occurring?

This review form is provided as a **sample of recommended questions or areas to be reviewed. LCSAs are responsible for all aspects of data submitted to the State and for ensuring accuracy and reliability of the data. Retain review forms in your records for a minimum of two years.*

Data Reliability Review*
(October 1, 2002 through September 30, 2003)

LCSA _____ Date Of Review _____

Case Number _____ Case Name _____

Audit area - PATERNITY ESTABLISHMENT (Lines 5 and 6 of the CS 1257)

1. Was this case reported correctly? yes _____ no _____

Line 5

2. Is the child on line 5 a member of an open case listed on line 1? If not, the child should not be included on line 5. yes _____ no _____

3. Was paternity at issue for the child? If no, the child should not be included on line 5. yes _____ no _____

4. Is the child's birth date correctly entered on line 5? yes _____ no _____

5. Was the child a minor during the federal fiscal year? If no, the child should not be included on line 5. yes _____ no _____

Line 6

6. Was the paternity establishment date correctly entered? yes _____ no _____

7. Was paternity established prior to the end of the audit period? yes _____ no _____

If the case was not reported correctly, what was the reason for the error and what action needs to be taken to correct it and prevent similar errors from occurring?

This review form is provided as a **sample of recommended questions or areas to be reviewed. LCSAs are responsible for all aspects of data submitted to the State and for ensuring accuracy and reliability of the data. Retain review forms in your records for a minimum of two years.*

Data Reliability Review*
(October 1, 2002 through September 30, 2003)

LCSA _____ Date Of Review _____

Case Number _____ Case Name _____

Audit area - PATERNITY ESTABLISHMENT (Lines 16 and 16b of the CS 1257)

1. Was this case reported correctly as a paternity established during the reporting period? yes _____ no _____
2. Was paternity at issue for the child? yes _____ no _____
If no, child should not be included on line 16.
3. Was the child a member of an open case? yes _____ no _____
4. Was the child a minor during the audit period? yes _____ no _____
If no, the child should not be included on line 16.
5. Was the child born in the state? yes _____ no _____
If no, the child should be included in line 16b.
6. Was a POP declaration signed during or before the reporting period? If yes, child should not be reported on line 16. yes _____ no _____
7. Was paternity established prior to the IV-D referral? yes _____ no _____
If yes, child should not be included on line 16.

If the case was not reported correctly, what was the reason for the error and what action needs to be taken to correct it and prevent similar errors from occurring?

This review form is provided as a **sample of recommended questions or areas to be reviewed. LCSAs are responsible for all aspects of data submitted to the State and for ensuring accuracy and reliability of the data. Retain review forms in your records for a minimum of two years.*

Data Reliability Review*
(October 1, 2002 through September 30, 2003)

LCSA _____ Date Of Review _____

Case Number _____ Case Name _____

Audit area – CASES WITH ARREARS (LINE 28) DUE AND CASES WITH AT LEAST ONE COLLECTION TOWARD ARREARS (LINE 29)

- 1. Was this case reported correctly? yes _____ no _____
- 2. Were arrears owed in this case yes _____ no _____
during the audit period?
- 3. Was an arrears collection made? yes _____ no _____
- 4. If an arrears collection was made, should yes _____ no _____
it have been applied to current support?

If the case was not reported correctly, what was the reason for the error and what action needs to be taken to correct it and prevent similar errors from occurring?

This review form is provided as a **sample of recommended questions or areas to be reviewed. LCSAs are responsible for all aspects of data submitted to the State and for ensuring accuracy and reliability of the data. Retain review forms in your records for a minimum of two years.*

QUARTERLY QUALITY ASSURANCE AND PERFORMANCE IMPROVEMENT (QAPI) DATA RELIABILITY REVIEW

DCSS 0011 (07/03)

LCSA:

PERIOD COVERED BY THIS REPORT:

Please Check One:

- All data were found to be correct.
- Cases contained incorrect data and the following errors were noted:

The Local Child Support Agency (LCSA) has taken the following actions to correct all errors identified:

(Please attach additional pages if necessary.)

I certify that the _____ Local Child Support Agency has reviewed _____ cases (25 or 50). **The review included a thorough examination of the data reported on lines 1, 2, 5, 6, 16, 24, 25, 28 and 29** of the CS 1257 (or 457 for the first quarter of FFY 2003 - Oct. 1 to Dec. 31, 2002).

LCSA DIRECTOR SIGNATURE

DATE

Sign and return this form within 45 days from the date of this letter and within 45 days following the end of each subsequent quarter.

Send the completed form to:

**DPAB BRANCH
P.O. Box 419064, MS 30
Rancho Cordova, CA 95747-9064**