

***APPENDIX J: DWSS AND COUNTY
DISTRICT ATTORNEY COMMENTS***

APPENDIX J: DEPARTMENT OF WELFARE AND SUPPORTIVE SERVICES AND COUNTY DISTRICT ATTORNEY COMMENTS

Preface to the Comments

This Appendix includes all the comments received from the Division of Welfare and Supportive Services (DWSS) and those Nevada County District Attorneys (DAs) who chose to provide comments to the Preliminary Report. The Preliminary Report was provided to the LCB and DWSS on Friday, October 6, 2006 based on contractual requirements. During the Exit Conference that was held with LCB and DWSS on Friday, October 13, 2006, initial comments were received by DWSS. DWSS provided to MAXIMUS additional budget information. MAXIMUS intended to significantly revise sections of the Preliminary Report, and offered to provide an updated version to the LCB and DWSS by November 3, 2006 for DWSS's use for its and the DAs' responses. MAXIMUS delivered the revised Preliminary Report on November 3rd, but due to transmission problems, DWSS did not receive all of the revised sections until November 5th.

In those instances where the DWSS or DA response indicates strong opposition to a recommendation, the comment and response to the comment have also been placed within the appropriate section of this Final Report. Wherever possible, comments in relation to specific findings and/or recommendations have also been placed within the appropriate section.



KENNY C. GUINN
Governor

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DIVISION OF WELFARE AND SUPPORTIVE SERVICES

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NANCY KATHRYN FORD
Administrator

November 17, 2006

Jeffrey Ball
Vice President of Marketing & Sales
MAXIMUS Child Support Division
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Dear Mr. Ball:

The Division includes herewith the responses to the Child Support Performance Audit conducted by MAXIMUS. It has been extremely difficult for the Division to effectively respond to MAXIMUS recommendations given the frequency and volume of revisions to the original document. The Division was further compromised when another version was issued on November 3, 2006 which included re-numbering of audit recommendations with no cross reference to any previous versions. Other concerns include:

- Chapter D was not received until November 5, 2006 leaving very little time for analysis and response.
- The most current version of the audit provided to the Division still is incomplete with placeholders for information which is still being gathered by MAXIMUS.
- Page numbers cannot be used for reference since page numbers often repeat themselves within the same chapter or section. Therefore, the Division's response was composed with reference to specific recommendations, rather than page and section numbers.
- Conclusions are made in the audit that appear to be based upon the various interviews without exploration of whether the conclusion is factual. For example, on page 14 of the Executive Summary, 6. Improving Training, reference is made that much of the training is learned on the job or through informal group discussions, without recognition of the training programs provided by Clark and Washoe Counties.

Given the aforementioned impediments, the responses are not as comprehensive as would otherwise be desired. It is unknown whether a final draft of the report was provided, therefore the attached responses were based upon the various drafts received. The responses were originally due by November 13, 2006 and subsequently extended to November 20, 2006. This extension is greatly appreciated. Assuming the November 3, 2006 and November 5, 2006 drafts containing track changes were the final drafts, 17 days was an inadequate amount of time to respond to such a lengthy report.

Working for the Welfare of ALL Nevadans

Responses provided by various counties are included as an additional attachment. It was intended that those responses would be incorporated into the Division's response. However, the lack of time afforded necessitated the inclusion of the counties' responses separately.

The Division and the counties will undoubtedly have additional comments after a final version of the audit is published. We are hopeful we will be afforded an additional comment period whereby we might supplement the responses provided in this document. Thank you for the hard work that went into this audit. It is recognized that the Child Support Enforcement Program is a large program with many nuances to be addressed. The work effort that went into this project is very much appreciated.

Sincerely,



Nancy K. Ford
Administrator

cc: Mike Willden, Director, Department of Health and Human Services
Paul Townsend, Legislative Auditor, Legislative Counsel Bureau
Gary Stagliano, Deputy Administrator, Program and Field Operations
Louise Bush, Chief, Child Support Enforcement
Pat Peacher, Lyon County District Attorney's Office
Carolyn L. Smith, Elko District Attorney's Office
Vicki Chittenden, Carson City District Attorney's Office
Susan Hallahan, Washoe County District Attorney's Office
Lori Garcia, Washoe County District Attorney's Office
Jenny Wegener, Humboldt County District Attorney's Office
Rita Fowler, Pershing County District Attorney's Office
Bob Teuton, Clark County District Attorney's Office

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November 17, 2006

Louise Bush, Chief CSEP
1470 College Parkway
Carson City, NV 89706-7924

Dear Ms. Bush:

The Carson City Child Support Division appreciates the work and dedication that went into the compilation of information that resulted in the preliminary report by Maximus, however we do not agree with many of the recommendations contained in the report.

We are firm in our position that regionalization will limit access for rural customers and are surprised at the recommendation due to the emphasis that Maximus places on customer service. Limiting access to the system for anyone is contrary to why we are here. Many customers prefer to communicate with their case manager face to face and we have found that it does facilitate the process. Regionalization would certainly cause a hardship for rural customers.

The second problem with regionalization is access to accurate and timely legal advice. Local child support offices within the District Attorney's Office are overseen by attorneys and the case managers have the benefit of immediate and ongoing access to legal advice. Legal questions arise frequently and can cause delays in processing a case if access to legal information is limited.

Maximus's suggestion of having different organizational systems in the North and the South would lead to inconsistent service across the state and cause unnecessary

confusion. We don't believe that dividing the system is in the best interest of any of the parties and would further compound the existing problems within the child support system.

While we agree that changes to the child support system are necessary and we look forward to improvements that will enhance the programs, regionalization is simply not the answer. It is possible that some child support tasks could and should be centralized to improve the system as has been done with FIDM. There may be other tasks that could be centralized and we would be happy to assist with recommendations to accomplish that,

While management reports are important, Nevada must be careful about adding too many more reports for the local offices. There is an overabundance of paperwork that currently inundates many of the smaller offices. Existing reports should be evaluated to determine if they can be improved or replaced in lieu of creating more reports that clutter an already complex and full data base.

We wholeheartedly agree with an improvement in training. The Carson City Child Support staff has benefited from the few training classes that have been held, and additional training would be very useful. Washoe County presented a week long class on using Ledgers on the Web and NAWC; it one of the best training classes presented. In addition, Central Office staff presented training on Case Closure and BOW that was very beneficial to our staff. The changes in child support are constant and complex, and therefore difficult to master without ongoing, competent training.

Additional training is sorely needed on the NOMADS system which is responsible for the majority of the problems in the Nevada Child Support Program. The system is very cumbersome and not user friendly. This system MUST be changed. For the novice or occasional NOMADS user, it can take 5-10 minutes to effect a simple address change. The commands in NOMADS are not consistent. For example, on one screen "open" is typed on the action line to open the screen, on another "apol" (an illogical acronym) must be entered in order to open the screen. There are so many details in the computer program alone that it is hinders

the case managers' ability to focus on the child support laws.

It seems that most of the programmers for NOMADS have been pulled to work on IV-A to make changes to that program and the child support system has suffered because of that. Child support was also adversely affected by changes that were being requested when a past director of NOMADS operations changed the way **work** items (changes in NOMADS) were to be handled. It was over a year before the IV-D program was able to submit work items to the programmers. This is unacceptable and has a negative impact on the staff's productivity and our service to the public.

Each time a change is made in NOMADS, **paperwork** setting forth and explaining the management of the changes is distributed to the local offices. This is the only "training" currently provided on modifications to the system. It often feels like a full-time job just to stay on top of the changes made to both the child support rules and the NOMADS system on a daily basis. It would be helpful to have training on NOMADS available for new staff members and have regular support available to assist the existing staff in dealing with the myriad of changes as they occur.

We agree that the IV-D and the IV-A are very different and should not be run in the same manner as one program is driven by the NCP and the other by the CST.

The District Attorney Offices have the experience of child **support operations** and as such should be the leaders of any future reorganization. We suggest that child support coordinators of the two larger counties take the top leadership roles with state staff taking the secondary positions until they become more educated in the legalities of child support. Thereafter, experience, education and actual leadership abilities should guide the appointment of leaders.

Many of the recommendations made in the area of Customer Service are useful, and some of the suggestions are already in place, such as using standardized forms when possible. The counties do use the federal forms and others when possible, but the child support offices are not the sole

determinants of the forms that will be used. Many forms are demanded by the judicial system and those requirements vary from one judicial district to the next. We do not believe that the application form should have been standardized. Central Office changed the application form to fit the IV-A program, and in so doing, deleted much information that was/is needed by the Child Support Offices to establish and begin working a case. The differences in requirements within the state make it impractical to have all the forms standardized and the state must consider the needs of and take input from local offices when creating or changing forms. The difference between the State's employer verification and Carson City District Attorney's Office employer verification is significant. The DA's form requests much more detailed information which expedites the compilation of information for the case manager. The State's verification form is deficient.

Stricter time limits developed by the State for customer service standards are sure to fail until a more user friendly technological system is developed for the child support program. It takes time to respond to questions and requests using the NOMADS system.

Case managers are often expected to take on multiple roles: social worker, child support case manager and computer technologist. All of these functions must be handled very quickly to allow the case manager to move on to the next client or case. Additional training in time management for case managers is vital to allow them to manage their cases appropriately and within the established time frames in order to comply with existing laws.

The District Attorney's staff understands their customer service duties however, there seems to be some confusion within the state staff. At times the Central Office customer service personnel provide incorrect information to the public which creates a conflict when the District Attorney Child Support Staff gives a different answer to an often hostile client. Part of the problem is that the State staff does not take time to read the case before they answer the client's question. Therefore, to provide the most efficient and useful customer service for clients, it

would be counterproductive to have a statewide Customer Service program.

In establishing a standard number for a case load the State must consider all the different ways the case loads are now divided in offices. There cradle to grave offices, there are task oriented office and there are offices that divide case loads by UIFSA and **instate** cases along with cradle to grave or task oriented. How an office divides its cases will depend on how many cases a case manager can efficiently manage.

In closing, one of the most important factors in improving Nevada Child Support ranking among the states is to make massive **repairs** and **improvements** to the NOMADS system or develop a newer, user friendly statewide computer system. Until that is done, the complexities of NOMADS will hold the state back.

Sincerely,

Vicki Chittenden
CSE Supervisor/Coordinator
Carson City District Attorney Ofc.

ARTHUR E. MALLORY
DISTRICT ATTORNEY



**OFFICE OF THE DISTRICT ATTORNEY
OF CHURCHILL COUNTY**

November 16, 2006

Louise Bush, Chief
Child Support Enforcement
Department of Human Resources
1470 College Parkway
Carson City, NV 89702

Re: Maximus Preliminary Report on Audit Findings
and Recommendations

Dear Ms. Bush

This response is to the approximately inch and a half thick Maximus Report which this office originally had exactly three working days in which to respond. Now that number of working days has been extended by a little over one week. However, said response time is still inadequate, as will be discussed further. Therefore, please consider this response to be rendered under protest on behalf of both Churchill County and as the President-elect of the Nevada District Attorney's Association. Specific references to the two different drafts are omitted because of the inadequate organization and lack of proper pagination of the audits.

Also, allowing such a short period of response time to the draft report and the second draft report, approximately three working days, at most, is indicative of both the attitude in the report, the many false premises and the incorrectly assumed facts upon which much of the information in the report were based, and the lack of consideration for the level of concern and professionalism that most of the 17 counties in Nevada have displayed toward child support collection and enforcement efforts. This professionalism and concern for the welfare of our citizens is extremely evident in the less densely populated counties, but ~~It~~ sure exists in more populated counties as well. The amount of time allotted, even with the second extension (approximately 10 days), is totally inadequate to respond to the extensive amount of misinterpretation and misstatements contained in both of the two drafts by Maximus and the resulting executive summary response by the State. If it is fully understood that much of the State's response is based on the manner in which Maximus presented its findings and because the State's response was very easily based on a defective and non-scientific based survey and the resulting conclusions and reports, it must be considered in that light. One must ask why do we continue to go down the wrong road on child support issues?

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STATE OF NEVADA
CHILD SUPPORT DIVISION

Page 2
Louise Bush, Chief
11/16/2006

As the elected District Attorney of Churchill County, as a previous Chief Deputy District Attorney in Nevada, and as an elected District Attorney for two terms in another state, I have personally been dealing with child support for in excess of 19 years. I have read all of the draft audit reports, the State's responses, and the responses of my fellow District Attorneys, and am presenting this limited response on behalf of not only this office, but what I believe to be the interests of especially the rural counties in Nevada, but, to a certain extent, all of the constituents that we serve with special emphasis on those who depend on our offices for assistance in collecting child support. An overriding concern is the impression and appearance in both the Maximus audit and the State's response, that there is very little true concern for our bottom line constituents, that is the citizens of this State. There does, however, appear to be a very sincere and acute concern and awareness of the needs of our citizens in the responses and the communications from the various counties. This is certainly, in part, due to the fact that your local district attorneys are, in fact, elected officials and therefore directly responsible to the people, but it is also, in large part, due to very dedicated local staffs who work with these individuals face-to-face on a daily basis and are truly and sincerely concerned that they receive the assistance that they are due from the local county and the State of Nevada. This does not appear to have been properly considered or addressed in either the actual survey or the State's responses.

I will draw your attention to the first paragraph of the Douglas County response dated November 14, 2006, concerning the many problems in dealing with the provided materials. In fact, the Douglas County letter from District Attorney Scott Doyle is an extremely well written and succinct evaluation of the entire situation. It is realized that District Attorney Doyle might not have been able to cover all of the salient points, but he certainly did a good job addressing some major issues in a little over two pages. Churchill County certainly joins in the views expressed by District Attorney Doyle in most instances. It should be noted that the November, 2006, draft of the Nancy Ford letter to Jeffrey Ball, Vice President of Maximus, also contains some very significant comments concerning defects with the audit process that should be considered.

Mineral County's District Attorney Cheri Emm-Smith addresses some major concerns in her November 9 response to the Maximus Audit. These concerns, both on the effect of further limiting services to our smaller communities and restricting the due process and legal rights of our constituents, should be taken very seriously. District Attorney Emm-Smith hit the nail on the head when she stated that rural services provide more satisfactory client service due to the smaller communities to which they provide services. Churchill County agrees that, due to the fact that the people we are serving are our constituents, but they are also our neighbors and our co-workers and people we see in the community every day. It is axiomatic that they receive timely, dignified and conscientious service.

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Louise Bush, Chief
11/16/2006

I refer to the phrase printed at the bottom of Mineral County District Attorney Cheri Emm-Smith's FAX cover sheet, which states simply, "KIDS COME FIRST." I cannot emphasize enough the depth of meaning that this phrase holds in the area of child support. Most of our child support recipients are single working mothers, often working two, even three jobs to make ends meet. They are taking on these extremely heavy burdens on behalf of their children and they are simply asking our assistance in enabling them to get by and provide decent lives for their children. Often custodial parents are people who need the most help and are in the position of being least able to provide it themselves. It is unacceptable to this office that anyone would question that this would best be accomplished on a local level.

Churchill County therefore incorporates Mineral County's response on behalf of the majority of other district attorney's offices that might not have had time to file a written response.

The Lincoln County District Attorney, Philip Dunleavy, in his November 13, 2006, letter in response to the Maximus audit further reiterates many of the concerns expressed by Douglas, Mineral and Churchill Counties in a very clear and precise manner. Needless to say, my conversations with District Attorney Dunleavy indicate that there would be even more problems than actually mentioned in his letter concerning implementation of the recommendations in the Maximus audit, or even the recommendations in the State's response.

I'm enclosing, with permission, a draft copy of Lyon County District Attorney's response to the child support audit. I have discussed this issue with both the Lyon County District Attorney, Leon Aberasturi, and various members of his staff and find them all to be extremely knowledgeable concerning not only the overriding considerations contained in Maximus' report and the State response, but in the very details of the report. The in depth knowledge displayed by Lyon County is just one more indication of how extremely competent and dedicated many of the local district attorney staffs are as to delivering quality child support services on a local level. This office would seriously question whether anyone in the state could surpass the knowledge demonstrated in the Lyon County draft as to the inner workings of the different areas with which the audit deals. Not only do we agree with the rough draft, but we strongly agree with the next to the last paragraph concerning what would appear to be a discriminatory and inadequate solution in dealing with rural counties in Nevada. It is very well said in Lyon County's draft that "amplifying the distances does not appear a logical solution." One would almost ask, "How could one think otherwise?"

This office has personally had conversations with Humboldt County, the Humboldt County District Attorney-elect Russell Smith, the Pershing County District Attorney, Jim

Page 4
Louise Bush, Chief
11/16/2006

Shirley, the Lincoln County District Attorney, Philip Dunleavy, the Mineral County District Attorney, Cheri Em-Smith, the Lyon County District Attorney, Leon Aberasturi, the Carson City District Attorney's Office, the Douglas County District Attorney's Office, Washoe County District Attorney, Dick Gammick, and representatives from the Clark County District Attorney's Office and the Nye County District Attorney's Office. The overarching issue that transcends the entire discussion is the tremendous detachment and injustice that would result in both the Maximus and State suggestion that child support be centralized.

The only county in the state that did not object to such centralization was Elko County, which would benefit from such centralization because it is already doing cases for White Pine, Lander and Eureka. Therefore, it would increase funding to that District Attorney's Office, and jobs and income to Elko County.

The same result would inversely apply to all of the other rural counties in the State, removing not only jobs and income from those counties, which are sorely needed, but also further degrading the level of services provided by the State of Nevada and the various counties to its citizens. Elko County makes some very good points in its letter, but we **strongly** disagree as to regionalization on behalf of the majority of the responding District Attorney's Offices. Regionalization or centralization is not the answer.

Recommendations:

It has become very apparent in the last several years that a complete top down evaluation must be accomplished at the state level before any issues at the county level could be possibly addressed. It would seem to be putting the cart before the horse to centralize or regionalize, utilizing a structure that gives every indication of being already broken. It is strongly suggested that our new governor and legislature consider a very in depth and honest evaluation, all the state offices involved in child support, with the eventual goal not of increasing bureaucracy, and not of depriving the rural counties of additional services, but, in fact, of better serving all the people of Nevada, especially those in the rural areas. Any course contrary to this would have long range, devastating effects to many of our families and children in rural Nevada.

If I can be of any assistance in the future, please feel free to contact me, both in my capacity as District Attorney of Churchill County, as President-elect of the Nevada District Attorney's Association and as Vice Chairman of the Prosecuting Attorney's Advisory Council. I have previously served on the Nevada Supreme Court's Advisory Committee on Rural Courts and Domestic Violence and several other committees dealing with problems in the rural areas and offer any assistance available.

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Louise Hush, Chief
11116/2006

Again, ~~thank~~ you for your time and consideration in ~~this matter~~. I know that our eventual goal is to best serve all the citizens of our great state and look forward to accomplishing that goal.

Sincerely,



Arthur E. Mallory
District Attorney

Enclosures

AEM: sk

cc: Governor-Elect Jim Gibbons
All Nevada District Attorneys and District Attorney-Elects
Senator Mike McGuinness
Assemblywoman Barbara Buckley
Assemblyman Tom Grady
Assemblyman **Pete Goicoechea**
Assemblyman-Elect Ed Goedhart
Michael Willden, Director
Nancy K. Ford, DWSS Administrator
Gary Stagliano, DWSS Deputy Administrator
Don Winne, Senior Deputy Attorney General
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OFFICE OF THE DISTRICT ATTORNEY



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District Attorney

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December 14, 2006

Ruth Hara
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Re: Comments regarding Draft MAXIMUS Report

Dear Ruth:

I know that the contract with the State of Nevada calls for local office comments to be directed to the Division of Welfare and Supportive Services (DWSS) and for DWSS to incorporate (or not) our responses in a more comprehensive response to MAXIMUS. Since time is short I have decided to forward these comments directly to you since they primarily deal with perceived errors, omissions or absent explanations in the report. I will, by separate letter, send an official response to DWSS which will include this letter as an attachment. The letter to DWSS will not focus so much on the perceived errors, omissions, or absent explanations that this letter contains but will address the overall report and recommendations.

Let me start this letter by stating that the task MAXIMUS undertook was exceptionally difficult given the organizational structure of child support services in Nevada. Many of our comments are the result of the fact that there is not one child support system in Nevada but many – ranging from the monolithic structure in Clark County (performing all IV-D functions) to bifurcated structures in other counties (bifurcation between PAO and District Attorney in Washoe and Elko counties) to structures where local District Attorney offices only perform child support services for non IV-A cases (Douglas County). These variations in service delivery are all set forth as attachment F to the 2004-2008 Interlocal Contract. The variations in service delivery also cause generalized statements to be inapplicable to Clark County (the cause of many of our comments). With these qualifiers, I will simply list our concerns and comments:

1. There are repeated references to Clark County comprising 71% of the cases in the state (e.g., pages 4, 24, 27, 43). This figure is taken from the State website. There is another report, Caseload by Office Report, which shows that the Clark County caseload is actually 59%. Is there a reason that one figure has been chosen over the other?

2. There are repeated references to the number of full time equivalents in Clark County and it is not always clear exactly what is being counted. The report states that there are 244.2 FTEs in Clark (pages 20, 22, 23), 243 (page 45). The information we provided reflects 247 FTE in Clark County plus an additional 7 State workers assigned to perform IV-D case responsibilities integrated in our workforce.
3. The description of the current child support system (page 21, et. seq.) showing case flow between a local PAO and District Attorney office does not apply in Clark County.
4. The statement is made (page 30, bullet 5) that there were organizational changes made in Clark County and “early indications of little impact on performance.” The report otherwise makes repeated references to the fact that there are no meaningful management reports – the type of report necessary to determine the relationship between changes in organizational structure and outcome measurements. The lack of these reports calls into question the basis for this statement. The State website (Caseload by Office Monthly Report – August, 2006) shows that Clark County represents 59% of cases in the State. Collections reports for August, however, show that Clark County collected 63% of all monies collected statewide. Moreover, collections in Clark County have increased from \$80,956,989 in calendar year 2003 to \$74,704,012 in the first 9 months of 2006. Our caseload has dropped during the same time period by over 6,000 cases. As a gross measure of change, something IS happening in Clark County even in the absence of the types of management reports and tools MAXIMUS is advocating.
5. The statement is made (page 33, second full paragraph) that Elko County [has] “long been held to be the best run office.” Without meaning to detract from Elko County this statement suggests that it is appropriate to compare the operations of Elko County to operations in Washoe, Clark or elsewhere in the State. We do not believe such a comparison fairly takes into account the differences in sizes and make-up of the various communities in the State. If there are specific management or casework techniques employed in Elko County which are transferable to other jurisdictions then we believe these should be stated to support the stated conclusion.
6. There are a number of references in the report to enhanced services to military bases (pages 34, 148, 156). Presumably, the recommendations have been made because this has been identified as a problem area, yet there is nothing in the report that supports this. The only interaction Clark County has with Nellis Air Force Base is to serve process – all other military interactions are not geographically connected to us. Are there findings made by MAXIMUS in Nevada that support these statements and recommendations?
7. Exhibit 19, page 44, attempts to distinguish Clark County’s performance from the performance in the State as a whole. This statistical comparison is very misleading and, in fact, we suggest that there should be a continuing caveat throughout the report that NOMADS statistical data does not necessarily reflect the actual performance of a given office (assuming that it does accurately reflect the performance of the State as a whole). It is interesting to note that the State website has the notation, posted in December of 2004, “Questions have been raised regarding the validity of Incentive Measures statistical data. A request has been submitted to review accuracy of data sources used to determine these statistics.” Similarly, the Incentive Measures monthly report on the web site states that effective December, 2005, “Future postings of this report are suspended pending review and possible revisions.” Attempts to generate ad hoc reports for paternity establishment have been unsuccessful since the report is based on case “ownership” (a status that changes

whenever a case is closed, re-opened, or otherwise transferred between offices). Clark County may establish paternity in a given case but if the case is closed "ownership" of the case is transferred to Office 19 (Las Vegas PAO office) which then gets the credit for having established paternity (the most recent ad hoc paternity establishment report shows Clark as having established 33,784 paternities and Office 19 (which does not establish paternity) as having established 1,625 paternities (as of August 1, 2006).

8. We question the wisdom, without a more detailed study, of commenting on caseload and/or attorney salary issues. There were 13,898 cases heard in court 2004 and 13,109 cases heard in court in 2005. This equates to approximately 1,500 cases presented in court per year per attorney (absent special assignments). Additionally, attorneys are called on not just to appear in court but are actively involved in cases from intake through disposition. Our attorneys routinely answer inquiries from specialized, higher paid private attorneys who do not know the intricacies of child support. Starting salary for Clark County Associate Attorneys is approximately \$68,000 and, under the current agreement with Clark County, the stated salary of \$140,000 will not be reached for 12 to 15 years of practice. I do not know if the suggestion is that seasoned attorneys with 12 to 15 years of practice can be employed for less money or if child support is not worthy of seasoned attorneys and that entry level attorneys are all that is ever needed to perform child support. I do not see any value in making this statement other than to direct the focus of this study away from its central theme – that the organizational structure and lack of management tools has doomed the current system to failure – to a generalized beating on attorneys.
9. There are multiple errors in the section of the report dealing with the VRU in Clark County. First, the statement that calls are "seamlessly routed" to the State VRU is inaccurate. Calls to Clark County are answered by Clark County personnel. They are provided with a PIN if they do not already have one and are then passed to the VRU which matches the PIN with the caseworker. The connection from Clark County to the State VRU bypasses all the non-IV-D prompts that exist for all other callers to State Welfare. The caller then has options at the VRU to obtain system information about their case or can "push off" to the Clark County office. The caller is given an option of either leaving a voice message for the case manager or pushing a button to speak to a live person if the phone is not answered. The only time the caller is not given either option is if the case manager is on a regularly scheduled day off, in which case the caller is provided with the days of the week that the case manager is available. Therefore, the diagram of calls originating from Clark County is also in error (page 70). The fact that the caller has the option of leaving a voice message or talking to a live person in Clark County breaks the "reoccurring loop" referenced at page 71.
10. The discussion concerning the fact that caseloads are out of balance in Washoe and Clark Counties (page 67) failed to mention the fact that NOMADS only allows for caseloads to be assigned one way: alphabetical. Caseloads cannot be distributed to enforcement workers in a manner different than distributed to paternity or order establishment workers. Moreover, while we are sympathetic to establishing uniform caseload measures so that equivalent FTEs can be established throughout the State, consideration must be given to the fact that Washoe and Clark Counties provide many "statewide" services (e.g., both counties make training resources – a state function – available to rural counties. Clark County I.T. developed a Born Out of Wedlock automation routine two years ago when all jurisdictions in the State reviewed our BOW indicators. This automation routine was used by everyone except Washoe County to update NOMADS. Clark and Washoe counties are currently moving

- forward on GUI front end screens for NOMADS which will be available throughout the State for use by all workers). Including these personnel, who would be considered “Central Office Support” personnel in any other state, in the local office FTE count would be unfair. I assume that these personnel are the ones that the statement “Clark and Washoe also have employees not performing case work at all and not doing child support work but are in their FTE count” is addressed to. If this statement is taken at face value, however, it simply is not true and we would like to know the identify of any person who is drawing child support salary who is not engaged in child support work so that appropriate actions can be taken.
11. Section C.10 (pages 82, et. seq.) discusses the issue of complaint and inquiry logs. Although Clark does not keep a log of customer inquiries, we do have a customer complaint log. All complaints – regardless of the source (web, phone, in person or by mail) are logged and routed to the appropriate personnel for resolution in accordance with written procedures.
 12. The discussion of the locate function being a PAO function (page 116) is true everywhere except Clark County. There is no “ping-pong” of cases between offices in Clark County.
 13. The discussion of access to credit bureau reporting (page 117) is accurate as far as the State is concerned. Clark County and, we believe, Washoe County, both have access to recognized Credit Bureau reports (Clark County uses Equifax) which we maintained after the State failed to renew a State contract.
 14. Finding D.1.2.1 references locate tools used by case managers (page 117). Each of the 12 teams of Supervisor, Senior, Family Support Specialist and Clerks in Clark County has trained personnel dedicated to the locate function. We do not know if the survey you conducted was provided to the Locate clerks or simply the case managers. Moreover, we do not know if the survey concerning locate tools was provided to all case managers or only case managers who might be involved in locate activities. This may account for the number of staff who stated that they did not receive sufficient training in locate work (page 119)
 15. A locate issue which was not addressed was the locate functionality in NOMADS. Although numerous locate sources are listed most of them do not function. There are locate functions which can be accessed through other screens but there is nothing in the system that directs a case manager (or locate clerk) to the other screen to conduct the action. The inadequacy of the NOMADS locate functionality should be addressed and a more robust recommendation made beyond those stated in the report.
 16. Recommendation D.1.3.2 (page 121). We do not dispute the recommendation. However, the statement that staff had had access to credit bureau information removed may be misleading. Most credit bureau reporting services automatically remove access if the service has not been used over a certain period of time. In Clark County we have had to restore access which was removed by the credit bureau reporting service.
 17. The recommendation that locate services in Clark County be removed from Investigations is misleading (page 123) in that it assumes that this function is assigned to our Investigations Unit. This is simply not true. As stated previously, the “locate” function is conducted at the Team level. Once the system has “located” an NCP sufficient for the next step in child support appropriate paperwork and processes are completed and the paperwork is delivered to staff process servers to serve the NCP. The report states that Investigators are used to serve process (page 132) and this statement is similarly not true in 95% of the cases. Investigators do serve process in those cases where there are indicators of violence – e.g., the custodian has alleged domestic violence, the NCP has a history of serious crimes against the person, etc. In all other cases our process servers serve process after the NCP fails to

- respond to a written invitation to voluntarily come to the office to accept service. Investigators are used to locate assets and to serve warrants only.
18. A comment is made at the top of page 132 that case managers, supervisors and Unit Administrators view voluntary acknowledgement of paternity as having a low priority. Our Unit Administrators dispute this statement as they do not recall even be asked the question, let alone viewing it as a "low priority."
 19. The discussion concerning use of In-Hospital Paternity Affidavits or other, non-court related paternity establishment (pages 127, et. seq.), completely missed problems with the State Bureau of Vital Statistics (BVS), a Bureau located within the State Department of Human Resources along with Child Support. There is a delay of 6 months to a year between the documents being generated at a local level and their being entered into the BVS system. Although we do not know this scenario as a fact, we have been told that when a local hospital transmits data to the BVS by diskette, if there is a single error on the disk the entire disk is returned to be redone and resubmitted. I do not have space in this letter to set out all the ramifications that this fact has on our system but I am sure MAXIMUS has experience from other states that would highlight the urgent need of this issue being addressed and can make some recommendations on simply increasing the speed by which records are updated.
 20. We believe that the recommendation that Clark County (page 134) move to a more administrative process for genetic testing be applied not simply to Clark County but statewide.
 21. The statement is made that Legal Office Assistants in the Court Desk prepare cases for court (page 140). This is not true. Paperwork for court is initially prepared by the case manager and forwarded directly to the attorneys for review. The court files are sent from the case manager to the audit unit to bring the financial information up to date and assure that an accurate representation of the financial information is provided to the attorneys to provide to the court. The Legal Office Assistants prepare the court calendars, file paperwork, accompany the attorneys to court, accept cash payments in court, update NOMADS after court, disburse documents to the litigants, etc. Recent changes in NOMADS may require that this staff be upgraded to a higher level in order to complete data entry assignments in NOMADS but they do not presently function as a resource that could be dispersed to the teams.
 22. The statement that DAFS process servers in Washoe and Clark County have little incentive to pursue child support matters is not true (page 140). In Clark County the Investigators and Process Servers are required to dedicate 100% of their time to child support matters. The only time Clark County relies on the Constable or Sheriff is to serve Writ Executions in FIDM matters.
 23. State Policy concerning use of Nevada Average Wage (page 141) has been changed so that case managers have the authority to set child support amounts based upon occupational income, when the NCP's occupation is known, or other verified information if actual income or occupational income is not known.
 24. We do not necessarily disagree with finding D.3.1, that "poor performance of the program in the area of enforcement boils down to poor execution of the enforcement task," but do not believe that sufficient emphasis has been placed on the fact that the "enforcement task" is not well defined. The initial emphasis on establishing federal certification created a management atmosphere of putting out individual fires in lieu of effective fire management. Ad hoc "clean up" reports have been generated so that resources can be marshaled to

- address the subject matter of the report rather than creating management reports that allow performance and performance improvement to be measured at the case manager, team, unit and office levels. Shifting resources from one fire to the next merely temporarily puts out the immediate fire but actually tends to cause other fires to burn uncontrolled. Imperfect automation efforts tend to exacerbate problems rather than alleviate them.
25. Clark County recognizes the inadequacies of its current building and as pointed out, is attempting to address these issues (page 146). The current building does, however, allow Team Supervisors to co-locate with their Teams even though the Unit Administrators are not necessarily located with their entire unit.
 26. MAXIMUS correctly points out that what many states view as “automated” enforcement tools are, in Nevada, labor intensive, semi-automated enforcement tools. We concur with the findings that the current attempt to automate wage withholding is inadequate, relying instead on manual review of wage withholding documents, correction of data fields, etc. Similarly, Driver’s License Suspension actions which should be triggered by set criteria and automatically generated in fact require intensive case worker management (unlike the statement in the report (page 150) that DLS is favored by case workers because it is semi-automated). Lottery and gaming intercept tools (page 150) are not used because they are not available in Nevada. The statement that there is little use of liens (page 150) is not true as, at least in Clark County, every Order containing a finding of financial delinquency is, in fact, recorded (and our IT team is pursuing, as part of the MROJ process, automatic filing and recording of MROJs with the County Recorder’s Office). FIDM may not be widely known or used by case managers in general (page 150) but in Clark County FIDM actions have been taken by a specialized FIDM unit. The biggest impediment to effective FIDM actions has been the inaccurate, incomplete or redundant data supplied to us by the State vendor and the inability to secure compliance with federal and state laws by recalcitrant banking institutions.
 27. The restructure recommended by PSI began immediately following the release of the report and recommendations and was completed approximately 18 months later with the establishment of 3 Units (headed by a Unit Administrator) comprised of 4 Teams each (headed by a Team Supervisor), a Senior Family Support Specialist and a compliment of Family Support Specialists. PSI recommended three years ago, and MAXIMUS appears to support the recommendation, that management reports be created so that performance at the case manager, team, unit and office levels could be measured, poor performance identified and corrective actions applied, followed by re-measurement. Clark County, as well as other District Attorney offices, contracted with the State of Nevada to provide these management reports as part of the Interlocal Agreement executed in December of 2004. No such reports have yet been created. The statement in the report (page 160), therefore, that Clark County has not been able to document the impact, if any, of the reorganization should be accompanied with an observation that it is not because of a lack of trying.
 28. Clark County was advised that case sampling was being done in all jurisdictions, yet the Clark County results is the only sampling that has been reported. We would like to know the results of sampling conducted in other areas of the State and if similar issues to those noted in Clark County were found. While the report breaks the case sampling down into groups of 20 focused on locate, paternity establishment, obligation establishment and enforcement, it is difficult to discern what conclusions are being made from this sampling of 80 out of 82,000 cases. Mention is made of the inability to locate files that had been

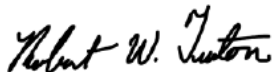
- requested but we are not aware that this concern was expressed at the time so that files could be located.
29. The report notes that 26,000 "case files" were transferred to the District Attorney's office from the Las Vegas PAO office and that some of the "case files" were still missing or unworked (page 162). I believe that I provided you with a complete history of the consolidation of PAO and District Attorney IV-D functions in Clark County. Although a time table for the orderly transfer of cases to Clark County had been established the actual physical transfer of "case files" as problematic. In fact, the last "transfer" of cases of the District Attorney's office was accomplished not by physical movement of case files but by the electronic assignment of the cases in NOMADS from Office 19 (LV PAO) to Office 2 (Clark County D.A.). There were approximately 2,000 cases "transferred" in this manner. The fact that there are missing "case files" should be accompanied with the fact that 2,000 such case files never existed.
 30. The concerns expressed by MAXIMUS regarding the movement of files and documents within our office (pages 162, et. seq.) are shared by Clark County management and form some of the basis for our seeking more efficient office environs. Clark County has attempted to mitigate some of the detrimental impacts of our current building and long ago began bar coding files and established a file request system to track the file throughout the office. More recently, we created a software program to create scanned images of all child support applications, routing of the scanned application to the appropriate child support team and tracking the entry of the application into NOMADS within federal and state timeframes. This program was expanded at our request to provide that all IV-A offices electronically scan and send any documents in their possession, necessary for IV-D actions, to our office where they are similarly maintained and tracked. Clark County is ready and willing to pursue a paperless child support system.
 31. The Best Practice (page 173) recognizes the innovation of the electronic MROJ but goes too far by stating that the MROJ is created during the hearing. In fact, the MROJ is first created by case managers. It is then reviewed by attorneys as a proposed recommendation and order and eventually is available for the hearing masters to complete. The MROJ allows legible copies of the Master's recommendation to be immediately available to the NCP, immediately input into NOMADS at the conclusion of the hearing, and immediately filed with the Records Office after signature by the District Court Judge. The current version of the MROJ is more of a "proof of concept" than a final process. Future versions will include generation of bench warrants to be signed by the District Court Judge at the same time that a recommendation to issue the bench warrant is converted to an Order; electronic filing of the MROJ with the Court clerk following signing of the order by the District Court Judge, as well as electronic filing of the Order with the County Recorder to establish a lien.
 32. Finding D.5.1.4 – replacement of NOMADS (pages 173, et. seq.). We concur with the recommendation that NOMADS needs to be replaced and only question the timing of the replacement. The report documents problems with the current system but understates some of the issues. For example, 317 work items existed in April 2006 to fix existing programming issues in NOMADS. The report fails to mention that on at least an annual, if not biannual basis, outstanding work items have been reviewed and re-prioritized, with the less significant work items being discarded out of recognition that they would never be addressed. This process has gone since the inception of NOMADS. The figure of 317 outstanding work items, therefore, drastically understates the number of known issues in

NOMADS. These comments apply equally to the recommendation that outstanding work items be reviewed and prioritized (page 184).

33. Clark County has an extensive new employee training as well as on-going refresher training (page 185). Training that is not provided in-house is provided through mandatory attendance at training sessions provided to all Clark County employees (e.g., Supervisor Training, Phone Etiquette training, Dealing with Difficult People Training, etc.) (pages 186, et. seq.).
34. Clark County staff does not know the details of Central Office functions (e.g., Help Desk) because Clark County operates its own Help Desk and staff are required to go through our Help Desk which, in turn, communicates with the Central Office Help Desk (pages 199, 200). This reduces the demand on the Central Office Help Desk and reduces redundant calls to the State Help Desk.
35. Clark County has regular team and unit meetings and minutes of these meetings are kept and distributed to the employees. Additionally, function area employees (e.g., Locate clerks) have regular meetings. I believe that Kathi Brunson sent a schedule of meetings to MAXIMUS. Finally, we have annual All Staff meetings which are video recorded and available on our web page for staff who were unable to attend in person to watch and listen to the proceedings. Our procedures are posted on our web page and we have an easy to use search engine (pages 201, et. seq.).
36. The Clark County Employee Performance Reviews are negotiated with the employees as part of the S.E.I.U. contract. (page 210).

I sincerely hope that these comments are worthwhile. None of these comments are meant to detract from what we perceive to be the central thesis of your report – that the child support program should be performance based and there should be stated, measurable performance criteria in existence in order for improvement to take place.

Very truly yours,



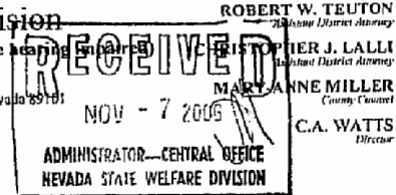
Assistant District Attorney

OFFICE OF THE DISTRICT ATTORNEY



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District Attorney

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November 1, 2006

Louise Bush, Chief, Child Support Enforcement
Division of Welfare and Supportive Services
1470 College Parkway
Carson City, Nevada 89706

Re: Comments on MAXIMUS Draft Report

Dear Louise:

Clark County appreciates the fact that we have been given an opportunity to comment on the Draft MAXIMUS report prior to publication. I understand that even as we are responding to the Draft report MAXIMUS is in the process of extensive re-writes of what has been provided us.

I took the liberty of sending Ruth Hara a letter yesterday addressing what we perceived to be factual errors in the report. These errors may have been mistake of facts, errors by omission or simply statements that needed additional qualifications in order to be more factually correct. A copy of that letter is included with this correspondence.

I would like to focus in this letter on the overriding themes and recommendations from MAXIMUS.

First, we concur with the conclusion that the IV-D program plays second fiddle to the IV-A and other State run programs. We agree that there should be organizational restructuring of the IV-D program, though not necessarily as proposed by MAXIMUS. We believe that the IV-D program at the State level should be placed at a level that insulates it from competing with IV-A for resources, policy decisions and performance measurements. We believe that decisions have been made in the past to enhance IV-A performance to the detriment of the IV-D program (an unintended consequence).

Second, we concur with the implicit recommendation that additional resources need to be provided to the program at the State level. Advances in automation, training, clear policy development and dissemination cannot be done based on the current staffing levels of the Central Office. MAXIMUS should include in this report

comparisons of the staffing levels (as well as responsibilities) of the Central Office in Nevada with similarly run programs in other States.

Third, we concur with the conclusion that management of the IV-D program should be based on performance. In fact, the counties contracted with the State to provide performance measurement tools two years ago and today we have nothing. MAXIMUS has recommended that performance be measured at the state, office, unit, team and worker level and we agree. We believe that the recommendations concerning development of management reports should be illustrated by examples from other jurisdictions where the development of such reports has, in fact, resulted in quantitative improvement in performance. Moreover, we believe that MAXIMUS should further support this recommendation by comparing these new and recommended management reports to the types of reports that are currently generated in NOMADS and the significant differences in management techniques that each report type requires (e.g., the ability to measure individual worker performance in specific areas (new) as opposed to "gross" ad hoc reports which generate "clean up" activities rather than provide managers with the ability to proactively prevent the necessity of "clean up" occurrences.

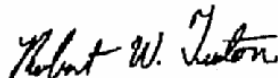
Fourth, we concur with the conclusion of the report that actual "automation" functionality needs to be incorporated in our computer system (be it resolving NOMADS "disfunctionality" or a staged implementation of an enhanced system). This set of recommendations includes resolving issues with wage withholding notices, form printing, the lack of automated interfaces with "locate" resources, etc.

Fifth, we believe that there are specific areas of concern which should be highlighted as areas for future improvements (if beyond the scope of the current study). For example, a recommendation that there be a review of other functional areas in State government with which increased collaboration may reduce the overall costs of the program and reap tremendous rewards, e.g.: (1) The collection, recordation and dissemination of birth records, for example, in an effort to gather more reliable data in a timely manner, would have a positive impact on Child Support collection efforts; (2) Employment and employer data currently collected by other State agencies may be used through interfaces with those systems rather than increasing the size of the staff in the IV-D to duplicate employer records already maintained by other agencies.

Sixth, we believe that consideration should be given to restructuring child support enforcement efforts so that local cases are dealt with at the local level and interstate cases are dealt with at the State level. Clark County has experienced considerable difficulties getting other states to take enforcement actions when our cases have been sent out of state for enforcement and MAXIMUS notes that enforcement of cases coming into this State is delayed, at best, under the current bifurcation of responsibility between the State and counties. Presumably, a Central Office function of handling both "in" and "out" case servicing would benefit our residents as well as custodians in other states.

Finally, we believe that regardless of the final recommendations MAXIMUS makes, an implementation schedule should be recommended and justified with measurement milestones established to determine whether the intended results have been achieved, whether implementation corrections should be made, etc. MAXIMUS rightfully stated that Clark County should review the impact of our organizational restructuring which was recommended by PSI. PSI also recommended the creation of management reports to measure performance. Our inability to conduct such review has been hampered by the absence of meaningful management reports. We believe that it makes little sense to reorganize at the State level without the ability to measure current performance and consistently measure performance thereafter as restructuring takes place. Quite frankly, we believe that implementation of all the recommendations short of the restructuring proposed by MAXIMUS (e.g., a performance based system enabled by clear policy, adequate training, a worker friendly automated system which actually reduces rather than exacerbates worker responsibilities, all of which is monitored by tailored management reports) will achieve the desired result of catapulting Nevada into the top tier of State performers.

Very truly yours,



Assistant District Attorney

cc: Nancy Ford, DWSS Administrator
Gary Stagliano, Deputy Administrator
David Roger, Clark County District Attorney
Richard Gammick, Washoe County District Attorney

Encl: 10/31/06 Letter to Ruth Hara

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November 14, 2006

Louise Bush, Chief
Child Support Enforcement
Department of Human Resources
1470 College Parkway
Carson City, Nevada 89706

Re: MAXIMUS Preliminary Report on Audit Findings and Recommendations
("MAXIMUS Report")

Dear Ms. Bush:

Douglas County appreciates the extension of time to 10:00 a.m., Friday, November 17, 2006, in which to respond to the MAXIMUS Report. The extra time helps but does not eliminate many of the difficulties associated with response to a draft report that is substantially revised during the comment period, contains incomplete information, is improperly paginated and insufficiently cross-referenced making meaningful comment largely impossible. We share the State's concerns on these points by attachment of the undated two page draft letter addressed to Jeffrey Ball, Vice-President of MAXIMUS from Nancy K. Ford to this letter.

The MAXIMUS Report makes several sound recommendations suggesting evolutionary changes rather than revolutionary change to the program. Examples of these recommendations include improved training, statutory changes regarding the presumption of parentage, increased use of voluntary acknowledgments of paternity, expedited genetic testing of parentage, using the administrative process to adjudicate enforcement matters with appeal to the district court for review on the administrative record, imaging documents and replacing NOMADS. All of these recommendations need to be implemented and given a reasonable time to improve performance before other steps are taken.

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November 14, 2006

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Some of the recommendations, like changing legal presumptions of parentage and using the administrative process for adjudication of enforcement matters will require legislative action. Other recommendations like imaging documents will necessitate both legislative change to provisions like Title 4 of NRS and changes to court rules to accommodate what MAXIMUS terms a "paperless process." Replacement of NOMADS will require substantial legislative appropriations and extensive cooperation between state administrators and county officials to avoid the debacle which was the conversion from LEGACY system to NOMADS in late 1998 and throughout 1999. Without belaboring the point, Douglas County was one of the few jurisdictions that performed file-by-file audits to populate financial information in NOMADS rather than simply populating those data fields by transfer of data from the LEGACY system. All of these recommendations can be implemented and must be given a reasonable time to work to determine their effect on overall state performance before considering some other recommendations proposed in the MAXIMUS Report.

In both the executive summary and the body of the report, MAXIMUS recommends emphasizing actual performance over policy adherence. Yet when it comes to the keystone recommendations of management structure, MAXIMUS makes recommendations which sacrifice performance for philosophical advancement of policies of regionalization and centralization.

Under either the regional office or the state-administered office approaches advocated by MAXIMUS, this consultant recommends co-mingling the Douglas County program with other programs in the western part of Nevada. Douglas County is not claiming perfection in the administration of its child support enforcement program but based on the drafts of the MAXIMUS report we reviewed it appears our program is not on the consultant's list of jurisdictions and PAO offices which MAXIMUS finds require "raising the numbers" to "increase the state performance overall." Mixing a stand alone program that performs to standard with programs that, in the consultant's view under perform and placing a management structure on top of the adequately performing program which will in reality be dominated by some performance cellar dwellers is not the recipe for improved performance. It is the consultant's statement of a policy preference for regionalization and centralization at the expense of performance.

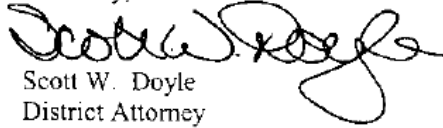
Give the evolutionary recommendations proposed by MAXIMUS a thorough implementation and a fair opportunity to improve this State's overall performance. If these initial steps do not produce sufficient increases in the State's numbers, then consideration of sweeping changes to the program's management may be in order. But right now the policy of

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November 14, 2006

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"bigger is better" is contradicted by the performance to date of smaller programs like those in Douglas and Elko counties. The recommended policy making sweeping changes to management structure should not be implemented.

Sincerely,



Scott W. Doyle
District Attorney

Encl.
cc: Arthur Mallory
Churchill County District Attorney
and President of the Nevada
District Attorney's Association

Jim Gibbons
Governor-Elect

Mark Jackson
Douglas County District Attorney-Elect

Daniel Holier, Manager
Douglas County

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CAROLYN L. SMITH
Supervisor/Coordinator

STEPHANIE A. POST
DENICE TAYLOR
NIKKI PLUMB
KENNETH CALTON
Caseworkers

Thursday, November 09, 2006

Re: **Maximus** Preliminary Report on Audit Findings & Recommendations

Overall, Elko County Child Support Office does not disagree with the majority of Maximus's findings and we were not surprised when reading the report. We are concerned no matter what actions the state takes based on this report, Clark County Family Support is 70% of Nevada's Child Support Program. Clark County Family Support still holds the **control** over the success of Nevada's Child Support Program, no matter how the other 30% of the state is structured. We strongly suggest you take a look at Clark Counties Child Support Program and start making immediate changes, otherwise, Nevada will continue to fail and continue to be at the bottom of all child support programs.

We suggest that you start to fix problems in the part of the state that needs help and let the rest of the state continue to perform at the **levels** acceptable by the federal government. Bottom line, the state must get the county that has 70% of our success up to federal performance levels, regardless.

The state should place a full time **QC** person at the Clark County Family Support Office immediately. This person will only perform case audits and work with Clark County staff to meet and exceed **all** federal performance standards.

You have asked offices what functions could be centralized and handled by central office staff. We suggest the state focus on centralizing functions from Clark County Family Support first. The state should not wait for Clark County to make suggestions. The state and Clark County need to look at centralizing functions that affect the most workers. Once Clark County has centralized functions, then focus on the rest of the states needs. I have listed a couple of examples below that could help Nevada's Child Support Program.

- Central Office could be working the paternity at issue vital statistics report and moving cases out of paternity and into an obligation status and this will increase Nevada's paternity percentage.
- Interstate cases being assigned to Clark County, central office staff should research vital records in Nevada, contact the parties or other state to **see** if they can resolve paternity, maybe other offices could benefit from this as well if they have low PEP percentages.
- If Clark County is struggling to enter court orders from interstate cases; central office staff could enter orders and move the case into enforcement which could lead to a collection faster.

- Remove the function to have Clark County establish on PA cases. Out source or structure another office to perform this duty. Once a case has an order establish, refer the case to Clark County Family Support for enforcement, similar to what happens in Washoe and Elko counties.
- Remove all PA cases from Clark County Family Support and Clark County will work only NA cases such as Douglas County. The PA cases will need to be out sourced or another office structured to work those cases.
- If Clark County is having problems working locate cases then centralize this function and maybe other offices could benefit from this as well.
- Alerts will always be an issue for offices. The bottom line is you have to get workers to work the alerts. Workers should be checking alerts every time they bring that case up on a NOMADS screen. Alerts should not be new to workers since NOMADS conversion. I am sure that offices had an alerts system prior to NOMADS. I do agree that NOMADS alerts could be minimized and this issue should be a priority.

We are in support of the findings to separate IV-A and IV-D Programs. These two programs are vastly different. The state should not **expect** a person to know both programs and that staff are interchangeable between the programs. IV-A should not have supervision over IV-D and IV-D should not have supervision over IV-A. IV-D and IV-A should communicate with each other and know how we affect each other and what information is needed to move the cases forward. It is not a bad idea to have the above offices located within a short distance from each other, (but not commingled within the same **office** space) for the main purpose of customer service for welfare customers only. In July 2006 Elko DA **caseload** was 2502, 1904 NA and **598** PA cases. Of the 598 PA cases, 355 were former assistance cases. The state needs to look at each **office** and evaluate if it is good business practice to co-locate a child support office by or within a district welfare office when the offices **caseload** size is 76% NA clients as Elko's **caseload** showed in July 2006.

I agree that Nevada should be performance based and all **offices** should strive to adhere to federal performance standards. The more money collected in Nevada, means more families become self **sufficient** which equals less people on welfare. I also agree that offices should adhere to policy, but this should not be the total outcome of an offices success. Nevada's Child Support Program has lost the meaning and value of why we have this program.

Since conversion, NOMADS has been unable to produce a report that is useful in the eyes of county management. I have had my own concerns if Nevada has been reporting our data to the federal government correctly. It seems that NOMADS reports have general failed us and **Maximus** is correct that we need to make sure **that** we have reports that are useful to the **offices** and the state is **confident** that our reporting of data is correct. Nevada should be contacting other top performing states and learn from them.

Nevada's Child Support Program needs to have dedicated IV-D programmers. If all of the work items cannot be fixed in NOMADS the state needs to consider starting over with a new computer system that should not be so complex and have hundreds of screens with no information or useless information on those screens.

It makes sense to regionalize the child support program in Nevada. We find some grey areas in Maximus's three recommendations of how the **state** should regionalize and **Elko** is willing to discuss these options further if and when that time comes. If the state is looking into regionalizing, the Elko region should be first and should be in stages. The reason the Elko

region should be looked at first, is you are merging smaller rural offices and you would not affect a large amount of staff. To merge these offices in stages, allows Elko's region to convert the case file into our existing format and allow for case cleanup.

I have **always** thought that the PAQ offices should be co-located within the District Attorney's Offices since we share cases. This will eliminate cases changing offices within NOMADS. The Nevada Child Support Program should have one case file for each **obligee/obligor** known to NOMADS.

I have to disagree with Maxiums regarding centralizing any child support programs to Southern Nevada. I strongly feel some of the rural areas could take on this responsibility. Some rural counties have a lot to offer to the people that live in those communities and then those rural child support workers would not lose jobs due to the regionalization. If all of the centralizing was up North or in some of the rural counties, you would not have the turn over in staff as you will experience in Southern Nevada where the job market is very strong **and** competitive. The state should try and keep existing **child** support workers that may not want to move due to the **regionalization**.

The program is trying to move forward in making the manuals user friendly, but this should be a priority. An **office** should not have several resources to look into to find answers. I like the idea regarding a **google** search when trying to research something in all manuals that are needed by the child support program. The state needs to look back at all policy and procedures that have been issued and be sure that these policies **have** been placed in the manuals. Manuals updates should be monthly and not quarterly.

Nevada's Child Support Program should be more aggressive in case closure. We allow cases to remain open when the case appears to be unenforceable or we do not know if a party wants our services. Nevada needs look at other top performing states and find out how they are able to close cases and pass federal audits. Nevada needs to revisit our policy regarding closing cases when the case becomes unenforceable.

We would also like to note a couple of factual errors in the **Maximus** report:

Page 22 Total DA FTEs

Elko County Child Support has 7 full time employees and an attorney that is used **less** than 10% of her time annually. The total FTEs **Maximus** reported was 8.2 for **Elko** District Attorney's Office and it should be 7.2 FTEs. July 2006 **caseload** for Elko DA was 2,502 divided by 7.2 FTEs equals 347.5 cases per FTE. The national average for **FY05** was one FTE for every 259.8 cases.

Page 158 D 3.2.10 Recommendation: Centralization of FIDM

Elko County Child Support still maintains control over FIDM for the cases assigned to the Elko District Attorney's Office. The **above** report is incorrect stating all rural Nevada counties have FIDM handled by one FTE at the Reno PAO.

Thank you for allowing us to respond to **Maximus** draft audit report. **Maximus** staff should be commended for the work and researching that went into this report. **Maximus** has hit the nail on the head with **Nevada's** Child Support Program on several topics discussed in the report.

HUMBOLDT COUNTY DISTRICT ATTORNEY

DAVID ALLISON
DISTRICT ATTORNEY



POST OFFICE BOX 909
WINNEMUCCA, NEVADA 89446

November 17, 2006

Dear Chief Bush:

With this letter I am responding to the MAXIMUS Audit. Because of the short timeframe in which to respond, this letter will be brief and address the points of greatest concern.

- Regionalization: This is an inappropriate concept for Humboldt County. We are a rural area with limited access to the three suggested regional offices (Elko being 123 miles to the east and Reno being 167 miles to the west).
- Internet and telephone access may be limited or non-existent, in the far reaches of the county.
- Complaints regarding the automated systems are numerous. Clients do not like dealing with JPMorgan for their debit card issues. Clients do not like automated phone systems that often times require at least a 5 minute wait for services and sometimes only to be provided inaccurate information or no information.
- Child Support Enforcement is a very personal and emotional issue for our clients. Subjecting these parents to a cold, insensitive and inhuman automated phone system bolsters the argument that government services are uncaring, insensitive and employee policy driven bureaucrats.
- Due Process in the appropriate venue is impossible with possible conflicts created by two or more judges making decisions in separate by related proceedings.
- Centralizing hasn't worked in the past; the "paperless" era is a case in point. Paperless is not longer the rule for a reason; it doesn't work.
- Policy based audits don't tell the whole story of the success or failure in servicing a particular case. Performance based audits are key to determine whether child support is efficiently collected for Nevada's children. Again, customer service fails when a system of specialized "experts" piecemeal case information. There is no continuity as to history or "special circumstances" involved.

CRIMINAL DIVISION (775) 623-6360 • FAX (775) 623-6365

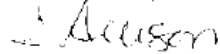
November 17, 2006
Page Two

- The systems errors of state computerized systems is notorious. The inability of NOMADS to properly populate fields with data entry is an example of policy driven inaccuracies.

Our sister counties to the west have submitted responses that accurately express the concerns of Humboldt County. Please refer to those responses and include Humboldt in a consensus with Pershing and Churchill Counties.

Thank you for the opportunity to respond to the MAXIMUS Audit.

Sincerely,



David G. Allison
Humboldt County
District Attorney

PHILIP DUNLEAVY
State Bar #598
District Attorney



OFFICE OF THE DISTRICT ATTORNEY
LINCOLN COUNTY, NEVADA

November 13, 2006

DYLAN V. FREHNER
State Bar #9020
Deputy District Attorney

RECEIVED
NOV 15 2006
CLERK OF DISTRICT COURT
LINCOLN COUNTY, NEVADA

Louise Bush
Chief, Child Support Enforcement
1470 College Parkway
Carson City, NV 89706
(775) 684-0705

RE: Maxims Audit and State Response

Dear Ms. Bush:

It has come to our attention that the State has conducted an audit/report, which will recommend that child support offices be taken away from the counties and placed in a regional system. We strongly oppose the recommended move to a regional system, and urge the State to leave the child support office under the counties.

Lincoln County's Child Support Office has been and continues to be an important asset to our community. Our child support officer, Trista Boyce, has provided excellent service for over ten years, and she is an essential link between the public and the District Attorney's office on child support matters. Creating a regional child support office would jeopardize the public's access to the office, especially in Lincoln County where residents all ready must travel long distances to get to the office and transportation is limited. Further, enforcement of child support would suffer from a regional system in that a regional system would have a greater case load and less contact with the individual DA's Offices. Similar problems already exist with the Division of Child and Family Services. Please take these items under consideration before going forward with any recommendation.

If you have any questions, please feel free to call. Further, we would request that we be noticed about any meeting or action that may take place on this issue. Thank you for your time. We look forward to discussing this with you in the future.

Sincerely,



Philip H. Dunleavy,
Lincoln County District Attorney

P.O. Box 60 • Pioche, Nevada 89043 • (775) 962-5171 • Fax (775) 962-5582



DISTRICT ATTORNEY'S OFFICE

LYON COUNTY, NEVADA

CHILD SUPPORT ENFORCEMENT

COURTHOUSE • 31 SOUTH MAIN STREET
YERINGTON, NEVADA 89447

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(775) 577-5049 • Fax (775) 463-6528

LEON ABERASTURI
DISTRICT ATTORNEY

RECEIVED

NOV 15 2006

STATE OF NEVADA
CHILD SUPPORT PROGRAM

November 14, 2006

Jeffrey Ball, Vice President
MAXIMUS
311 Caprice Court
Loveland, Ohio 45140

Dear Mr. Ball:

Thank you for the opportunity to respond. Lyon County also appreciates the extension of time, as these are important issues regarding the provision of child support services in the State of Nevada. Lyon County may have additional comments in the future.

Lyon County does not agree with suggestions that the IV-D program needs restructuring as stated. While there may be a need for redefining roles within the present structure, Lyon County does not believe that the merger of PAO's and District Attorney's Offices into three regional offices would increase the level of customer service or resolve the problems currently facing the IV-D program.

Lyon County suggests that the better focus for improvement would be on the data reliability system. The IV-D program revolves around and depends upon the Nomads system. The current system is outdated, repetitious, and inaccurate. The system contributes to the difficulty the IV-D side of the program has in meeting federal requirements. The Nomads interface program is the greatest detriment to the IV-D program.

Lyon County would suggest that the Nomads program needs to be reengineered. There needs to be a feasibility study done on the restructuring of data reliability. The DWSS which implemented the current system needs to be held accountable for the data reliability issue. At such time, the DWSS needs a plan for updating and correcting the current deteriorating system, which has reduced the productivity of the IV-D program. Lyon County would prefer replacing NOMADS with a new application from scratch and covert with adequate training to use the new program and with support for any issues or errors that the new application may encounter.

Inaccurate data input from the IV-A staff and the failure of the IV-A staff to send referrals to the IV-D staff in a specific period has affected the IV-D performance. The IV-A staff needs to account to the DWSS for its lack of performance.

Page 2 of 3

The current program indicates no design or specific program to attain the required national performance rankings under federal guidelines. When errors were brought to Central Office's attention, the burden of resolving shortcomings was left to the IV-D side. DWSS apparently disagrees with the representation that the IV-D program is secondary to IV-A considerations. However, the IV-D side of the equation has clearly taken the blunt of this program.

The process of management evaluations, which included ensuring policy adherence, was instituted by Central Office without the benefit of providing proper training and support to the individual caseworkers handling the day-to-day issues involved in cases. The idea that the welfare state website accessibility is sufficient to provide a caseworker with the tools and knowledge to perform the caseworker's duties lacks support from the audit's findings.

The DWSS agrees with the recommendation that administrative procedures be utilized in favor of judicial process. Lyon County would have to review specific administrative procedures prior to recommending that child support obligations be handled in an administrative fashion only. It is the position of the Lyon County District Attorney's Office that clients, both non-custodial and custodial parents, have the right of due process and to be heard in a court of law if desired. Misunderstandings or miscommunications may arise if the matter is handled in entirely administrative fashion.

Currently, the District Attorney's Offices and the Attorney General's Office are responsible for providing Child Support Services as a public service. This is beneficial to the clients as the District Attorney's Offices and the Attorney General's Office have the greatest experience and familiarity with Child Support issues both factual and legal, as compared to a private or a contracted attorney. While incentives are used to increase efficiencies, pure profit motive does not interfere with the end goal of providing service to the citizens of the State of Nevada.

The authorization of the referral of child support cases to private contract attorneys would likely result in deteriorating quality to the customer, both in terms of time and satisfaction. The extensive amount of "court preparation" would interfere with the profit motives of private counsel. Lyon County would strongly suggest that further in depth study occur regarding the actual costs involved in providing services.

The more appropriate solution would appear to be to balance the caseload within each office within the federal criteria to guarantee a quality of work performance. Lyon County is the fastest growing county in the State of Nevada. Our office can appreciate the need to adhere to balancing our caseload to insure that our clients receive the best service in every aspect.

Page 3 of 3

Lyon County does not agree with the Regionalization of Child Support Offices. Regionalization offices are not an answer to the existing problems facing the current child support structure. Lyon County maintains an on hands accessibility to the customer. Lyon County Child Support is a local point of contact, which is necessary to the customer. Our office provides walk in service to approximately 5 - 10 customers on a daily basis.

Our caseworkers provide hands on assistance to help in resolving issues and doing appropriate paperwork to successfully complete the case. Our updated phone system provides the ability for the customer to communicate with their caseworkers and the ability to leave a message on voice mail. Our office has a minimum of 40 – 50 calls per day. Our office policy is to return phone calls in a 24 hour turn around. Our receptionist helps the client at the counter and on the phone.

Lyon County also offers a web site with updated information for the clients use. Lyon County receives several calls a week from frustrated clients living in other larger jurisdictions that cannot reach their caseworker or receive necessary information regarding child support as their communication efforts reverts to a machine. Automation has not shown to be the solution to communication problems. The socio-economic situations many of the clients find themselves in does not allow for easy telephone or computer access.

The feasibility of a biweekly or monthly circuit rider to visit every rural county on a monthly or weekly basis by Maximus and DWSS is a discriminating and inadequate solution for rural counties serving the community. Lyon County questions whether the suggestion truly appreciates the vast distances that already complicate service under the current system. Amplifying the distances does not appear a logical solution.

Lyon County is committed to help Nevada successfully reach the desired outcome for child support in the most important goal, which is providing support to families. Thank you for the opportunity to give input on the audit findings and recommendations. While problems clearly exist, Lyon County believes that further dialogue and review of possible solutions will provide better service delivery to the people we serve.

Sincerely,



Patricia Peacher
Lyon County Child Support Supervisor

Office of the
District Attorney of Mineral County
P.O. Box 1210
Hawthorne, Nevada 89415

Cheri Erum-Smith
District Attorney

John W. Cripps
Deputy District Attorney

November 9, 2006

Courthouse Annex
166 E Street
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Facsimile: (775) 945-0740

Louise Bush, Chief
Division of Welfare and Supportive Services
Child Support Enforcement Program
1470 College Parkway
Carson City, NV 89706-7924

RE: Mineral County Response to Maxims Audit

Dear Ms. Bush,

Please be advised that I am prosecuting a felony molest case by jury trial for the week of November 13th, consequently, I am unable to provide you an in-depth response to the Maxims audit by November 17, 2006. A short synopsis of my response follows:

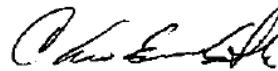
- 1) I am not surprised that the rural offices provide more satisfactory client services due to the smaller communities to which we provide services. This is common and unique for rural Nevada due to our constituents also being our neighbors and coworkers.
- 2) I feel that due process requires individuals to be afforded a judicial forum in the jurisdiction where the case is adjudicated. Anything less would constitute a violation of the tenets of law governing venue under Nevada Revised Statutes and case law.
- 3) I question the wisdom of moving court hearings out of the rural areas to a regional based court where the rural areas were identified as being the most efficient. In my opinion, regionalizing the child support procedures as set forth in the Maxims audit would further complicate Nevada's position in the overall child support system.

The rural Child Support offices and Hearing Master proceedings are critical thresholds that must be utilized in adjudicating child support and paternity. All due process must be respected because child support hearings affect not only a person's ability to maintain a livelihood but also may enable or destroy the parental-child relationship. The importance of these proceedings can only be appreciated by those who practice in this forum.

Ltr to L. Bush
November 9, 2006
Page 2

Please advise me of any action the State anticipates regarding any changes to the current child support system. I am available to discuss these matters with the State office.

Sincerely,



CHERI EMM-SMITH
Mineral County District Attorney

cc: Michael Willden, Director
Nancy K. Ford, DWSS Administrator
Gary Stagliano, DWSS Deputy Administrator
Don Winne, Senior Deputy Attorney General
Jeffrey Frischmann, Program Specialist III

ROBERT S. BECKETT
DISTRICT ATTORNEY



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Reply To: SUPPORT ENFORCEMENT

November 15, 2006

Ms. Louise Bush, Chief
NV Central Registry
1470 College Parkway
Carson City, NV 89706-7924

RE: MAXIMUS AUDIT RESPONSE

Dear Ms. Bush:

While Nye County agrees that both state and local workers shall be held accountable for the failure and or success of the program, we oppose regionalizing the program or consolidating it into three regions. As stated in "centralized case processing", seven out of ten IV-D parents rely on the services of the local District Attorney's Offices. In Nye County, parties are set for hearing upon their request within one to two months of said request which affords due process to the clients. So called "regionalization" will place greater distance between the parties we are attempting to serve. The more localized the program is, it will yield more stable employment with greater knowledge.

If central case processing were to occur, we could not accurately track and monitor our cases. For example, in Nye County we have found that there has been minimal response to enforcement tools such as delinquent and credit bureau letters and driver's license suspension; however, the filing of a criminal complaint for felony non support gets the non-compliant parent's attention coupled with faster access to District Court which has resulted in a dramatic increase in collections in our county.

Nye County strongly agrees with the recommendation of improved training. It is a real issue in the rural counties where our budgets limit access to outside training.

We believe the issue of paternity establishment needs further research to determine the legal ramifications if the caseworkers were responsible for conducting DNA testing with regards to the chain of custody, etc.

Page 2

Using administrative process deprives clients of due process and basic constitutional rights. In order to cure this, there would have to be extensive legislative and funding for an administrative process. The system as it is currently set up seems to work effectively.

Nye County believes that the replacement of NOMADS should be the state's first priority!! We think by purchasing a new system which has proved to work effectively for another state would be the best option. The current system is not only hard to learn, it is hard to navigate, contains bad data and contains too many "work-arounds".

In conclusion, having the Child Support Enforcement Division in the local District Attorney's Office allows for immediate access to the assigned attorney for questions, answers, signing of documents, etc. Being a rural county office allows for a "hands on" relationship with your clients and the files which leads back to the issue of customer service. Removing the personal contact with clients, we believe, will adversely affect customer service. Additionally, being that this is a rural county, the local community take pride in whatever employment opportunities are afforded in our area, especially in the public sector; therefore, we see fewer turnovers in jobs. Turnovers cost money! Training new employees where turnovers occur could prove to be quite costly. Keeping child support enforcement in the rural offices' where turnover of employees are lower, would allow for the funds not used for continual training of new employees to be used for advanced training of existing workers.

We would like to take this opportunity to thank you for allowing us to respond to this very important matter.

Sincerely,



ROBERT S. BECKETT, District Attorney
Nye County, Nevada

Office of
District Attorney
Pershing County
P.O. Box 299/400 Main Street
Lovelock, Nevada 89419

JIM C. SHIRLEY
District Attorney
RITA D. FOWLER
Deputy District Attorney

Telephone (775) 273-2613
Fax (775) 273-7058

November 17, 2006

Dear Chief Bush:

Pershing County has received a copy of the preliminary audit from Maximus. Having an independent audit of the State program was a good idea which brought to light many areas to improve upon. However, upon review there are several concerns that must be addressed. Lovelock is a fairly isolated community with Fallon being the closest town approximately 50 miles Southwest of Lovelock. Winnemucca is the second closest town and is located 70 miles Northeast of Lovelock. In a nutshell, Pershing County practically defines the word "rural."

Centralization of Services and Forms

The first concern that the Audit presents is the focus on centralizing Child Support Services and forms. Pershing County parents do not have nor are they likely to gain access to the Internet in the near future. We are often getting complaints regarding the automated systems we now have with the debit card. Many times the caseworker has had to call JP Morgan for the client, as the client was unable to navigate the system. Furthermore, many of our rural clients cannot afford a phone or a vehicle. They have been known to walk to our office to use a phone to call the Welfare office that is located 50 miles away. Some of our clients have even been known to carpool to the Welfare office.

Oftentimes we are given compliments regarding the fact that our clients are actually able to speak to a human being rather than a machine. They often express frustration with automated systems especially California's where it can be virtually impossible to contact a person regarding a case (even as caseworker's we experience this frustration). Automated response units simply are not customer friendly and would serve to reduce our customer satisfaction rather than enhance it.

Centralizing tasks such as mass data processing, wage withholdings and national medical support notices would lead to lower case performance. Examples of this include the instance by which Las Vegas PAO was in charge of referrals for some rural counties. The rural county cases were lost in the "paperless" shuffle and it would sometimes take as long as two years before a case was discovered, even if the caseworker was current on alerts. Another decrease efficiency of a centralized task is evident by the number of interstate packets we receive from Central office that are not even assigned to our county. Even this specialized division cannot seem to get it right. That is only one task, what is to prevent further disorganization as the task and forms increase?

Another concern over the functionality of centralized processing is the fact that our current centralized office does not have actual case processing knowledge but is policy based. Policy is good in theory but hard to apply. What will prevent our clients

from calling in to a centralized system and again speaking with someone who has no case management experience or skills? The client might be able to get one question answered and then have to be referred to a succession of persons handling different tasks on the clients case. It would be more efficient to leave the rural counties status quo with one person who has all the answers or who will call the client back once the answer is learned. Furthermore, where is the benefit of having a centralized mailroom scanning images of the mail and then forwarding them to the appropriate office? It will take the mail twice as long to get to the caseworker and then the caseworker has to process it anyway.

Regionalized offices

The Pershing County D.A.'s office strongly opposes transitioning the child support program from local county office to regionalization and then to be run by the State in the future. The regionalization of the Child Support offices does not take into the account the needs of the rural clients. A majority of our clients do not have a phone, cars or Internet access. They are on low fixed incomes and many are unemployed. They live in a rural area and would not be easily able to travel to a regional office. Given these facts a regional office would not meet their needs.

The rural counties should not be subject to regionalization just because they do not have the majority of the cases. Our clients should not be made to suffer just because they choose to live in a rural area. Intake for the rural counties to be achieved through circuit riding, phone, web and kiosk accessibility is ridiculous. The State has taken over many services in Pershing County and has failed. For example, the State regionalized the Division of Child and Family Services. The regional office governing Lovelock was based in Elko. The result – dozens of abused children being left in the home to be abused without proper services. The regional office has no local accountability. It was only recently that services were changed with Churchill County providing services to Lovelock with an assigned worker. In the past year alone over 30 children have been removed from homes in Pershing County because we are finally able get some services. How did this happen? It was not because the State listened, or the regional directors listened – it was because the District Court Judges were disgusted with the lack of services provided to this rural community's children.

Additionally, the State is supposed to provide Parole and Probation services to Lovelock. The result – many of our parolees and probationers are not properly supervised. Why? Because the regionalized State agency cannot successfully serve a rural community such as Lovelock. The State, through their regionalized offices, has taken over other programs in our area and the same result occurred. A third example would be the mental health program. The State took over the services of mental health promising to provide said services – the result – we no longer have functioning mental health services. Again and again Lovelock has been subject to the State promising to provide services through regional offices and the State consistently fails to provide those services. There is absolutely no evidence that regionalization of the child support offices would have a result other than the result achieved by other State predecessors. Said result being failure to provide services and a rural community being left without services. A fax machine, kiosk or circuit rider cannot be termed proper "services" and would only serve to further alienate our rural clients. The result would not be in the best interest of the clients, the State or the children.

Telephonic hearings and administrative hearings

Furthermore, the audit states that it would be more beneficial and less of an inconvenience to the parties to have telephonic hearings. I would like to know if the local attorneys were questioned. This statement leads me to believe that the law is an inconvenience. Having a court proceeding "be convenient" to the parties is beside the point. The point is that the parties have a legal obligation to support their children. How is this obligation enforced? This is accomplished through a court order, convenient or not. In certain circumstances telephonic hearings may be appropriate. However, there are other factors that must be considered such as the right to due process. Each party has the right to be heard before a judicial officer, a right to discovery, a right to examine evidence and a right to appeal. The parties should not have to appeal in order to exercise their due process rights, as they would have none before an administrative officer. Furthermore, case law in the State of Nevada requires that the parties must stipulate to having a telephonic hearing and then the judicial officer must determine when to grant that request. When it comes to telephonic hearings and administrative hearings the audit clearly overlooks one key factor – the law.

Policy adherence

The audit correctly suggested that Nevada should focus on performance rather than policy adherence. The Child Support Enforcement Policy Manual is completely outdated. Nomads is outdated. The policy guidelines are higher than even the Federal Guidelines – yet, no additional training is provided, the policy updates are extremely slow in developing, and the policies are set by individuals who have never even performed actual casework themselves. Furthermore, the CEM often contradicts the Nevada Revised Statutes. Thus, given all these factors, a focus on policy adherence is highly ineffective and unrealistic. The auditors are correct in stating that performance should be the focus of the program, as policy adherence will only be an acceptable scale to be judged by once the policy is actually updated correctly and proper training has been received. Furthermore, if the policy based enforcement tactics continue then the State needs to provide additional training as well as providing more re-reviews of more cases so that the office can ensure compliance.

Nomads

The audit was correct in stating that the State needs a functional program. Furthermore, the State needs only one functioning program, not multiple programs for different functions. Having only one system would greatly improve efficient in that caseworkers could be intensely trained once, and then periodically trained on various updates.

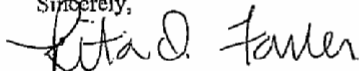
Conclusion

The above stated points are but a few issues that are related to centralization and regionalization of the child support programs. There is no denying the fact that the State of Nevada needs to change their child support program. Nevada is one of the lowest performance ratings in the Nation for many areas of review. But one must speak honestly – it is not the rural counties that are causing these low performance rates – it is largely Clark County. Why on earth would the State want to centralize services in Clark County when there is such a high turnover rate in the employees in that County now? Why not provide additional support services and training to Clark County and other

counties as needed in certain areas of low performance? Why not restructure the State program to enhance training, get one system that works and can be consistently updated, unlike Nomads presently is? Why not update the policy manual correctly and have said manuals comply with the Nevada Revised Statutes? Why not allow for due process in the hearing procedures, as the law requires? Why not provides additional training for the local offices rather than taking away the local services?

There is no doubt that change must be made to improve the program. However, this change should not come about by sacrificing the rural county offices.

Sincerely,



Rita D. Fowler
Deputy District Attorney
Child Support Supervisor

cc. Jim C. Shirley
Pershing County District Attorney



Washoe County District Attorney

**RICHARD A. GAMMICK
DISTRICT ATTORNEY**

October 30, 2006

Louise Bush, Chief, Child Support Enforcement
Division of Welfare and Supportive Services
1470 College Parkway
Carson City, NV 89706

Subject: Draft MAXIMUS Report

Dear Louise:

Thank you for the opportunity to respond to the Draft Maximus Report. Preliminarily, we would like to state that we respect the insurmountable task that Maximus took on of researching and reviewing the root cause(s) of Nevada's poor performance in child support enforcement and we applaud their efforts in attempting to make recommendations for improvement. However, it is our belief that reorganizing the program and its core staff into regional areas would do little to no good without first curing the root cause of Nevada's failures: the NOMADS computer system and the related IT issues of the inability to mine data and provide meaningful management reports down to the worker level to ensure success.

The report repeatedly makes reference that if the Legislature adopts only one recommendation it should be that the focus of the IV-D program should be on performance, not policy adherence. Specifically, that we must be able to mine data and measure performance levels down to the office, unit and worker levels. What gets measured gets done. Without these management reports, the child support program will never know whether any other changes made were successful or not.

The report also seems to indicate that Clark County made structural changes to their office in light of the PSI report, yet those changes are showing "little impact on performance." We question how Maximus can come to this conclusion when repeatedly throughout the report, it is

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recognized that such tools to measure performance do not currently exist.

In order to move forward, we support the conclusion by Maximus that NOMADS needs to be replaced within the next couple years. Many of the dilemmas set forth in the report facing caseworkers today are related to IT issues - such as alerts and locate problems. For example, the report fails to recognize that many of the locate interfaces in NOMADS simply do not work. In addition, while it "sounds" logical to give Lexis/Nexis access to all caseworkers, the useful information garnered from this system is only available to law enforcement officers - hence, the need for investigators. It should be noted, however, that if the interfaces for locate tools actually worked in the NOMADS system, there may not be such a need for "outside" locate work. Centralization of the locate effort without first fixing the computer issues would not result in any different outcome than what exists today - instead, you would simply have different people doing the same job with the same insufficient tools reaching the same inadequate results. This rationale carries out to other program issues as well, not just locate. Without first obtaining a computer system that could provide reports to workers to proactively manage their cases and that could provide reports to management to measure such performance, any other changes would be premature and ill-fated.

We agree with the recommendation of Maximus as they relate to dedicating IT resources to the IV-D child support program. Specifically, at pages 124 and 154, Maximus recommends publishing performance standards within the workspace and each individual worker's progress toward meeting that expectation. This recommendation would hold true throughout the child support program and performance standards. Each worker needs to know how they are doing with respect to their performance, not to mention supervisory staff. The ability to mine data and provide such reports is necessary to this program's future success. It is questioned whether the current NOMADS system allows for such data mining much less whether such reports would be made up of valid data.

Maximus also discusses the need for imaging documents and adopting a forms generation solution. Again, these are issues repeatedly raised by IV-D child support staff that to date have not come to fruition but are key to future

success. We also support the ability for clients to interactively update their information or provide data via alternate media such as transactional websites and strategically placed kiosks.

It is agreed that a comprehensive Child Support Strategic Plan must be developed and implemented. This Strategic Plan must involve participation of State and local child support management. However, any successful strategic plan must have measurable outcomes or results to determine success or failure. Performance measurement, if done properly, can identify performance adequacy as well as identify areas of performance deficiency but the key to a successful plan is the ability to measure. Again, what gets measured gets done.

In conclusion, we fully support the recommendation of Maximus that DWSS focus of performance rather than strict policy adherence. The strict policy adherence leaves IV-D staff focusing on documenting action for the sake of "passing" an audit rather than focusing on performing for the benefit of children and families. However, we must stress that in order to demand performance from IV-D staff, we must give them the tools (reports) to proactively manage their caseloads and we must give management the tools (reports) to ensure compliance. These management reports must also provide a clear indication on whether changes are proving to be successful or not and must be comprised of valid data.

We would also like to note the factual errors in the Maximus report:

The most glaring factual error noted in this report is found at page 67: "Clark and Washoe also have FTEs not performing casework at all and not doing child support work but are in their FTE count." All 63 Washoe County District Attorney Family Support staff members are dedicated to full-time child support work. While they may not all be assigned a caseload and "performing casework", they are all doing child support work related to the IV-D program.

Page 71: "Since Washoe County elected to link their VRU with Central Office VRU this past February, an unintended negative consequence has been the influx of callers to the direct Washoe County Courthouse phone line. This practice is upsetting to the court staff and creating a minor

hostility towards the child support agency." We are unaware of any calls that have been received directly by courthouse staff as a result of the VRU and are unaware of any hostility between courthouse staff and the child support agency. Accordingly, we question this factual finding. However, we would note that there have been calls received by the "main" District Attorney's Office phone number that have been received by receptionists and forwarded to the appropriate child support worker. We are unaware, however, of any hostility this has created and question the factual finding in this regard.


Page 71: The report states that the main child support lobby happens to be on the same floor as the court's lobby. This is factually incorrect. The main child support lobby is located on the 4th floor of the Mills B. Lane Justice Center and is co-located with other D.A. Departments, such as Victim Witness Assistance Center, Fraudulent Check Department, Discovery and Warrants Division. There is no court staff on this floor. In addition, the report states that there are only a few chairs when in reality there are over 20 chairs available. Washoe also has five interview rooms - each with their own computer. The report indicates Washoe only has a "few". It should also be noted that access to the 4th floor, which is the only public floor for the D.A.'s office, is not limited via controls on the elevator. Only the non-public floors from 5 - 8 are subject to such controls.

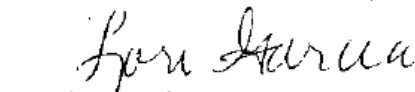
Page 132-133: The report states that investigators are used heavily for process service. This is incorrect in Washoe County. Washoe relies primarily on the Washoe County Sheriff's Office to provide process service. Only in the event that the Sheriff's Office is unable to serve and only on limited circumstances are the investigators called upon to serve process. The Maximus staff may have visited Washoe during the time of a special paternity establishment project seeking to raise the PEP percentage for Nevada. In that regard, and for an approximate 5-6 week time frame, the three investigators were called upon to serve paternity actions.

/ / / /

Page 296: Incorrect spelling of interviewed staff - Janet Oneirie should be Janet O'Neill; Kashe Filmer should be Kathi Filmer; Stephanie Grimium should be Stephanie Grimm; Derina Bennett should be Drina Bennett.

Thank you for the opportunity to provide Washoe's response.


Susan Hallahan
Chief Deputy District Attorney
Family Support Division


Lori Garcia
Program Manager
Family Support Division



Washoe County District Attorney

RICHARD A. GAMMICK
DISTRICT ATTORNEY

November 16, 2006

Louise Bush, Chief, Child Support Enforcement
Division of Welfare and Supportive Services
1470 College Parkway
Carson City, NV 89706

RE: Supplemental response to Amended MAXIMUS draft report

Dear Louise:

Thank you again for the opportunity to respond to the Draft MAXIMUS Report as recently amended. This office would again like to reiterate that the priority of this program must be the reparation and ultimate replacement of NOMADS. Then, and only then, should the State evaluate the necessity of adopting any of the supplemental recommendations in the draft report, such as reorganization. We submit that such reorganization would be wholly unnecessary if the local offices that are in place now had access to valid technological tools that would assist them in performing their duties. As set forth in the report, the program is replete with dedicated, hard working, caring individuals who are focused on performing. If these individuals had a functioning computer system, which assisted rather than hindered them, coupled with reports at the worker level to proactively run their day, performance would clearly improve. This is what successful child support programs across the nation have, regardless of how they are structurally organized.

The Report also makes recommendations as to centralizing certain functions and creating a call center. In addition, there was a recommendation for process servers specifically dedicated to the IV-D program. These ideas may have merit provided they are appropriately planned for and adequately funded. In fact, many of the suggestions in the Report have been and continue to be discussed in the monthly IV-D planning meetings and conference calls even before the Report was disclosed.

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This office is also opposed to the adoption in whole of an administrative process as set forth in the report. Litigants are entitled to certain due process rights and to have their legal issues decided by a judicial officer. These rights cannot simply be ignored in an attempt to simplify a program. It is further our understanding that such process was attempted in Washoe County many years ago and it proved to be unsuccessful. Child support establishment and enforcement gives rise to many legal issues that need to be dealt with by lawyers and judiciary.

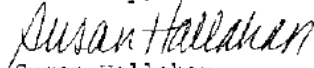
We cannot respond to the funding recommendation set forth on pages 16-17 or the performance impact percentages set forth on pages 17-18 of the Executive Summary as the Report does not include the data on which the Maximus calculations were based on. However, on its face, these numbers appear to be questionable.

Finally, we would just like to reiterate the priorities that need to be met before consideration of other costly recommendations:

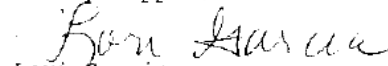
- Improve NOMADS functionality
- Mine data to provide management and worker reports at the office level, team level and individual worker level
- Completing a feasibility study to ultimately replace NOMADS

As previously stated, the focus must first be on correction of the technological issues facing the program.

Sincerely,



Susan Hallahan
Chief Deputy District Attorney
Family Support Division



Lori Garcia
Program Manager
Family Support Division

NEVADA DIVISION OF WELFARE AND SUPPORTIVE SERVICES RESPONSE TO CHILD SUPPORT AUDIT

EXECUTIVE SUMMARY

The Division of Welfare and Supportive Services [DWSS] appreciates the efforts and analysis that has resulted in this audit. Although the agency concurs with many of the recommendations, there are areas in which there is disagreement. Initially, the responses to the first draft were made with reference to section numbers, where pertinent, or section titles and page numbers where section numbers were not utilized. In subsequent drafts of the report, section numbers, page numbers, etc. changed. Therefore, the responses will be to each chapter of the report as there is inadequate time to appropriately cross reference.

The DWSS will respond to the top ten recommendations as presented in the Executive Summary and more specifically in the pertinent chapters of the audit.

LEAD RECOMMENDATIONS:

1. (a-c) Restructuring the Program

The DWSS agrees with the proposal to restructure the Child Support Enforcement Program through regionalization of offices. DWSS concurs the ultimate result of a restructure of the program should include what is referred to as "statization". However, the following counties disagree with the proposed restructuring of the program: Clark, Washoe, Carson City, Douglas, Lyon, Humboldt, Nye, Pershing, Churchill, Mineral and Lincoln.

2. Centralizing Case-processing and Call Center Functions

The DWSS generally agrees with the recommendation to centralize various functions. Steps have already been undertaken to address some of the proposals.

Providing Excellent Customer Service

The DWSS agrees with the recommendations contained in this section.

3. Measuring Performance

The Executive Summary presents the Nevada Child Support Enforcement Program should focus on performance rather than policy adherence. The audit fails to recognize that through policy adherence, the program maximizes its opportunity to achieve outcomes. It further appears certain conclusions are drawn regarding the concept of policy adherence without having the data or exploratory analysis done to reach those conclusions. The audit states child support leaders interviewed indicated the focus should be primarily on performance. The audit report does not provide a definition of policy adherence. Nevada defines policy adherence as a means to ensure every case is processed timely and accurately, ensuring equitable treatment of all customers, thereby

maximizing the opportunity to achieve desired outcomes. Additionally, it includes adherence to timeframes mandated by Federal regulations and State law.

The DWSS continues to conduct annual Federal Self Assessment Reviews for each county operation in compliance with 45 CFR § 308. The Federal Self Assessment Review is focused on the following performance outcomes: case closure; paternity establishment; enforcement of orders; disbursement of collections; securing & enforcing medical support orders; review & adjustment of orders; interstate services; and, expedited process. State policy adherence serves as a blueprint for achieving federal performance outcomes. Both state policy adherence and federal performance outcomes are measured annually.

Prior to January 1, 2005, the various District Attorney's offices determined how they would monitor their office's performance and set their own priorities. In fact, prior to the new contract, the statewide program focus was on performance outcomes and Nevada declined in national performance rankings. During that time frame, Nevada was under penalty status for data reliability concerns. A new contract with the District Attorneys took effect January 1, 2005 which emphasized the State's authority over the Program. In early 2006, the DWSS adopted a process of management evaluations which included ensuring policy adherence. Since this new process of policy adherence has been in effect for less than one year, the final results of Nevada's management evaluations and reviews and the impact on performance is yet to be determined. However, preliminary data indicates performance outcomes have improved, particularly in the area of paternity establishment, which has been a challenge for Nevada the past several years. In addition, Nevada passed data reliability in Federal Fiscal Year 2005, thereby ceasing the accruing penalties.

4. Improving Management Reporting

The DWSS agrees with the recommendations regarding development of additional management reports.

5. Strategic Planning

The DWSS agrees with this recommendation and has already developed an outline for a strategic plan.

6. Improving Training

The DWSS generally agrees with this recommendation and, given the limitations of available staff, resources and funding, has already taken steps to address this concern. However, DWSS disagrees with the comment "it appears most knowledge is gained on the job or through informal group discussions." Both Clark and Washoe Counties have developed formal curriculum to train new staff and offered support to other jurisdictions.

IMPROVING CASE PROCESSING

7. Improving the Paternity Establishment Process

The DWSS agrees with the recommendations provided and has in fact previously taken action in various areas, including advancement of the hospital-based paternity program, the introduction of an on-line interface with the Office of Vital Statistics to access birth records, initiation of the buccal swab program, and working with the Office of Vital Statistics to allow witnessed rather than notarized acknowledgements of paternity. The DWSS would welcome legislation to create a conclusive presumption of paternity if genetic test results indicate a 99.9% probability of paternity.

8. Using Administrative Process

The DWSS agrees with the recommendation that administrative procedures be utilized in favor of judicial process. Nevada has the ability to administratively serve subpoenas and liens. Currently, Nevada has a quasi-administrative process that requires Hearing Masters to make recommendations. The order is not final until reviewed and approved by a District Court Judge. It is believed it would be more cost effective and efficient to utilize administrative hearing officers with the opportunity to seek judicial review, rather than requiring all cases be reviewed by the Court. Such a change would require statutory changes.

9. Imaging Documents

The DWSS agrees with this recommendation and believes this recommendation will bring significant benefit to program performance. The DWSS has initiated some preliminary software efforts towards this objective, but is delayed due to limited funding and resources.

10. Replacing NOMADS

The DWSS agrees with this recommendation, but would suggest that a feasibility study be conducted to determine the best method of replacement of NOMADS. The options may include: write a new application from scratch and convert; transfer a system from another State; purchase a custom off the shelf product and convert from old to new; or migrate NOMADS one module or business function at a time.

11. Funding Recommendation

The report lacks a methodology explaining how MAXIMUS arrived at these fiscal amounts. DWSS requests MAXIMUS provide information necessary to validate the estimates in the chart titled Impact of Top Ten Recommendations on Incentives, Collections and Cost Savings.

IMPACT OF RECOMMENDATIONS

The DWSS is unable to respond at this time as the dollar impacts have not been provided.

CONCLUSION

The DWSS concurs with many of the recommendations provided in the audit report. However, many steps have already been taken which have advanced Nevada's performance. The DWSS is hampered from being more aggressive in pursuing change due to current limits to funding and resource availability.

The report lacks a methodology explaining how MAXIMUS arrived at these performance indicators. DWSS requests MAXIMUS provide information necessary to validate the estimates in the chart titled Performance Impact of Top Ten Recommendations.

CHAPTER A - BACKGROUND

The DWSS has no comments on Chapter A.

CHAPTER B – PROPOSED RESTRUCTURING OF THE NEVADA CHILD SUPPORT PROGRAM

Current Nevada Program Structure

State Structure and Staffing

The Chief of the Child Support Enforcement Program is responsible for full statewide operation of the program, administratively and operationally. There are currently 100 statewide full time equivalents in the Child Support Enforcement Program in the DWSS. The breakdown of staff in offices is as follows:

Northern Nevada

Central Office CSE (includes QC):	18
SCaDU:	6
Information Systems/Help Desk:	5
Customer Service:	3
Investigation & Recovery	1
Reno PAO:	23
Elko PAO:	4
In District Offices:	2

Southern Nevada

LV PAO:	3
SCaDU:	14
Customer Service	1
Information Systems Tester	1
Clark County DAFS:	7
Trainer (SPDC):	1
Employment Assistance Program	3
In District Offices:	6
Investigations & Recovery	2
TOTAL	100

Local Structure and Staffing

The assigned responsibilities for child support cases vary depending on the office. In White Pine County, the White Pine County District Attorney's office terminated their contract. Therefore, all child support services in that county are provided by the DWSS staff.

The audit provides the number of cases per FTE in Nevada and nationally. However, it is the State's understanding this calculation is based upon total FTEs including management and administrative staff and is not limited to case managers.

The DWSS recommends modifying Exhibit 5: Nevada Jurisdictional Caseload to show the percentage of statewide caseload rather than the percent of State.

FUNDING

With regard to federal incentives, 45 CFR § 305.35 requires incentives to be utilized to supplement and not supplant other funds. Therefore, the loss of the ability to match incentives, as a result of the Deficit Reduction Act, results in less opportunity to augment the program. There should be no impact on the county's base budget from the loss of incentive match.

Based upon the change in the contract with the District Attorneys, which took effect January 1, 2005, FFY 2005 will be the first year the state will participate in receiving incentives.

PERFORMANCE MEASURES

The audit indicates the emphasis on policy adherence has resulted in poor performance. As stated previously, prior to January 1, 2005, the program focused on performance outcomes. The measurement of policy adherence did not begin until early 2006; therefore, the full impact is unknown. In addition, the audit provides information for FFY 2005 performance, but fails to make a comparison to FFY 2004 performance, which would have illustrated improvement.

DWSS disagrees with the representation the IV-D Program is secondary to IV-A considerations. DWSS agrees additional solutions should be introduced focusing on IV-D improvements at all levels. Discussions have been initiated to centralize specific IV-D functions statewide.

CUSTOMER SERVICE

Redundant customer service systems were deliberately put in place to address disaster recovery and to allow for statewide selection of staff. It is a prudent business practice to have redundant systems in this area.

FUTURE OPERATIONS STRUCTURE

DWSS concurs with the concept of regionalization to improve accountability and performance. However, this will require legislative approval of amendments to statutes, adequate funding and staff.

Recommendation 1 – Options A, B and C: DWSS agrees with regionalization of IV-D offices and believes option C should be the end result using the recommended phased-in approach to optimize transition and minimize business/customer impacts.

Program Leadership Structure

Recommendation 12: The IV-D Chief's placement in the DWSS organization was deliberate and advances program cooperation between IV-A and IV-D.

Recommendation 13: The DWSS disagrees with centralizing functions solely in Las Vegas based on the ability to recruit. The DWSS has made a deliberate effort to place centralized functions in both the north and south to ensure redundancy of systems in case of disaster or down time in one geographic location. Therefore, customer service, SCaDU, VRU, Quality Control, Systems Support are located in both the north and south.

Recommendation 14: The DWSS agrees performance is an important component of success. However, DWSS believes performance and policy adherence go together as one.

CHAPTER C – CUSTOMER SERVICE

C.1. BACKGROUND FOR CUSTOMER SERVICE STUDY

The DWSS has no comment.

C.2. METHODOLOGY

The DWSS has no comment.

C.2.1 Staff Interviews

The DWSS has no comment.

C.2.2. Customer Interviews

The five interviews conducted with external customers is an inadequate sampling.

C.2.3. Customer Surveys

The DWSS was also disappointed in the low response to the surveys. It should be noted that many of the undeliverable mailings were returned due to failure of the contractor to utilize the full address provided by DWSS.

C.2.4. Requests for Documentation

The statement, "NOMADS is not able to produce management reports with the details necessary to provide effective management..." is inaccurate. NOMADS is able to produce management reports, but it is not "coded" to produce management reports with details.

C.3. CUSTOMER SERVICE DELIVERY

C.3.3 Recommendations

C.3.3.1 Recommendation: Establish Standards Regarding The Method And Timeliness Of Contacts With Customers, And Monitor Compliance To Those Standards

The DWSS agrees standards for customer service should be established. DWSS currently employs the Management Evaluation process by which shortcomings can be identified and rectified.

C.3.3.2 Recommendation: Streamline Mail Handling

The DWSS agrees with these recommendations, contingent upon adequate funding and resources.

C.3.3.3 Recommendation: Consider Providing An Enhanced E-Mail Option As A Method For Communication Between Case Managers And Customers

The DWSS agrees with this recommendation, but recognizes the need for adequate staff to be responsive to this method of communication. The lack of adequate staff to man this process could result in customer frustration and dissatisfaction.

C.4. VOICE RESPONSE UNIT (VRU)

C.4.2 Findings

It is represented the CSU offers preference to public assistance customers. There is no distinction between child support or public assistance customers. Callers are served on a first come, first served basis. Additionally, it should be noted child support piloted the CSU and public assistance was added in March 2004.

C.4.3 Recommendations

C.4.3.1 (a-h) Recommendation: Improve the Existing VRU

DWSS generally agrees with the recommendations, contingent upon the availability of funding and required staff and equipment.

C.5 CUSTOMER SERVICE CULTURE

C.5.2 Findings

C.5.2.1 Finding: There Is A Lack Of Knowledge About Central Office's And Local Offices' Duties In Regards To Customer Service

The Central Office Customer Service Representatives are able to transfer a customer to their child support caseworker. However, they are precluded from doing so based on business rules established by the county IV-D offices.

C.5.3 Recommendations

C.5.3.1 Recommendation: Creation of a Statewide Customer Service Committee and Plan

The DWSS agrees with the recommendation but believes it can be addressed through the current IV-D Planning Committee rather than creating a new committee.

C.5.3.2 Recommendation: Include Customer Service Delivery Goals and Objectives as Part of Case Managers' Annual Personnel Evaluations

The DWSS agrees with the concept, however, application of this practice is contingent upon "statization" or voluntary compliance by IV-D partners.

C.5.3.3 Recommendation: Solicit Feedback from External Customers

The DWSS agrees with this recommendation and is currently expanding its Management Evaluation Reviews to include surveys of internal and external customers.

C.5.3.4 Recommendation: Establish an Equitable Distribution of Cases

The DWSS agrees with the recommendation. DWSS presented a draft time study to assist in determining a staffing standard which is currently under discussion with the county IV-D staff.

C.5.3.5 Recommendation: Change in Paradigm of Case Ownership

The DWSS agrees with the need for cultural change and has already initiated conversations with IV-D participants advancing the concept of shared case responsibility.

C.5.3.6 Recommendation: Consideration Should be Given to Customer Service Needs in Future Office Space Planning

The DWSS agrees future building plans must meet future customer needs and security. However, this is contingent upon adequate funding and resources.

C.5.3.7 Recommendation: Adoption of a Proactive Approach Towards Customer Service

The DWSS agrees with these recommendations, contingent upon adequate funding and resources.

C.5.3.8 Recommendation: Provide Specialized Customer Service Training

The DWSS agrees with these recommendations, contingent upon adequate funding and resources.

C.6 COMPLAINTS

C.6.3 Recommendations

C.6.3.1 Recommendation: Implement and Monitor the Formal Procedure for Handling Complaints

The DWSS agrees to work with IV-D partners to develop forms, methods for tracking complaints, and amend policy as necessary.

C.7 WEB SITE

C.7.3 Recommendations

C.7.3.1 (a-h) Recommendation: Enhance Central Office's Web Site for Case Participants and Employers

The DWSS agrees with the recommendation, contingent upon the availability of adequate staff, funding and required resources. In addition, there may be automation security issues which must be overcome.

C.8 DOCUMENTS: FORMS, CORRESPONDENCE, AND LITERATURE

C.8.3 Recommendations

C.8.3.1 (a-c) Recommendation: Improve the Readability and Clarity of Customer Forms and Correspondence

The DWSS agrees with the recommendation and is currently developing and piloting a Central Document Management System (CDMS) which is expected to promote the standardization and improved readability of forms.

C.8.3.2 Recommendation: Standardized Forms Should Be Used by All Offices, When Possible.

The DWSS agrees with the recommendation and is currently developing and piloting a Central Document Management System (CDMS) which is expected to promote the standardization and improved readability of forms.

C.8.3.3 (a-b) Recommendation: Improve the Readability and Clarity of Customer Literature

The DWSS agrees with this recommendation.

C.8.3.4 Recommendation: Develop an Outreach Plan

The DWSS agrees with these recommendations, contingent upon adequate funding and resources.

C.8.3.5 Recommendation: Assign Responsibility for Development of Outreach Materials to the DWSS Central Office

The DWSS currently develops various outreach literature appropriate for statewide distribution. The DWSS agrees to review the literature for possible expansion contingent upon adequate funding and resources.

C.8.3.6 Recommendation: Expand the Dissemination of Brochures and Fact Sheets

The DWSS agrees with the recommendation contingent upon available funding and resources.

C.8.3.7 (a-c) Recommendation: Improve the Readability, Clarity, and Accessibility of the "Application for Child Support Services"

The DWSS agrees with the recommendation contingent upon available funding and resources.

C.9 HELP DESK

C.9.3 Recommendations

See responses to Section D.9.2.3.

C.10 EMPLOYERS

C.10.3 Recommendations

C.10.3.1 Recommendation: Strengthen Relationship with Employers

The DWSS agrees with this recommendation and has developed an employer outreach plan and has taken steps to implement aggressive employer outreach. DWSS agrees with the recommendation contingent upon available funding and resources.

C.10.3.2 Recommendation: Ease Employer Burden

The DWSS agrees with the recommendation contingent upon available funding and resources.

CHAPTER D - EFFECTIVENESS OF OPERATIONS

D.1. LOCATE

METHODOLOGY:

It should be noted many of the undeliverable mailings were returned due to failure of the contractor to utilize the full address provided by the DWSS.

D.1.3.1 Recommendation: Centralization of Locate

D.1.3.1.a The DWSS agrees. However, centralization of Locate tasks assumes the Legislature adopts the proposed restructuring and the availability of funding and resources.

D.1.3.1.b The policy manual is currently being reviewed and updated in its entirety to provide clear guidance.

D.1.3.1.c Note: there is no recommendation per se, in this paragraph.

D.1.3.2 Recommendation: Provision of Additional Locate Tools

The DWSS agrees with these recommendations, contingent upon adequate funding and resources.

D.1.3.3 Recommendation: NOMADS Interface and Alert Problems

D.1.3.3.a The DWSS agrees that IT resources should be utilized to improve system functionality. However, such as effort would be dependent upon the availability of funding and resources.

D.1.3.3.b The DWSS agrees with these recommendations, contingent upon adequate funding and resources.

D.1.3.3.c Program is already exploring the possibility of securing the locate service for custodial parents.

D.1.3.4 Recommendation: Locate as a Sub-Function

The DWSS agrees IT resources should be utilized to improve system functionality. However, such as effort would be dependent upon the availability of funding and resources.

D.1.3.5 Recommendation: Performance Standards

D.1.3.5.a Agree, depending upon legislative actions regarding program restructure. DWSS has developed a supervisory review process which is utilized and available to our county partners.

D.1.3.5.b Agree, depending upon legislative actions regarding program structure.

D.1.3.6 Recommendation: Provision of Locate Training

D.1.3.6.a Agree, depending upon legislative actions regarding program restructure and available funding and resources.

D.1.3.6.b The DWSS agrees with this recommendation.

D.1.3.6.c The DWSS agrees with these recommendations, contingent upon adequate funding and resources.

D.2. PATERNITY ESTABLISHMENT

Background

It should be noted that any funding cuts assessed as child support program penalties affect only the TANF Block Grant (IV-A). IV-D funding is only affected through incentive reductions.

D.2.1.2 Finding – Required Notarization of Paternity Affidavits

There is no statutory or program policy requirement that a notarized paternity affidavit be provided before any action is taken to pursue the establishment of paternity. In addition, DWSS has already worked with the Hearing Masters and implemented expedient methods by which paternity actions can be initiated, including statements made under penalty of perjury rather than being notarized.

D.2.1.3 Finding – Lack of Administrative Process for Paternity & Order Establishment

Nevada does not have a true administrative process for paternity and order establishment, as each order must be recommended by a Hearing Master and approved by a District Court Judge. This would require a change to statutes.

D.2.1.4 Finding – Little Use of Voluntary Paternity Acknowledgements and In-Hospital Paternity Acknowledgements

The audit indicates this is a DWSS responsibility. This is not solely a DWSS responsibility. The IV-D Program is required to operate a hospital based paternity program. DWSS, in state fiscal year 2005, aggressively began action to partner with the Office of Vital Statistics to provide education, materials, counseling, etc. to advance paternity acknowledgements before patient discharge.

The DWSS currently accesses the Office of Vital Statistics information via an on-line interface which allows IV-D case managers the ability to research birth records. However, Nevada Revised Statute 440.325 precludes the Office of Vital Statistics from sharing automated information related to

modification of original birth records. This results in case managers pursuing paternity establishment based on outdated data.

D.2.2 Recommendations

D.2.2.1 Recommendation: Paternity Establishment Policy

D.2.2.1.a Agree. There could be benefit in developing standardized procedures. However, DWSS has chosen to publish clear and explicit policy which sets forth timeframes for accomplishing outcomes. Outcomes are measured through office Management Evaluations. When performance concerns are identified root cause analysis may necessitate modification of business practices at the office level.

D.2.2.1.b The DWSS has developed and provided flow charts to county partners.

D.2.2.2 Recommendation: Genetic Testing Scheduling and Delays

Agree. Nevada already has a plan in place to implement this process.

D.2.2.3 Recommendation: Required Notarization of Paternity Affidavits

Agree. By statute (NRS 440.283) the voluntary acknowledgement of paternity form is the responsibility of the State Board of Health. Any change to the form must be made the Board. The DWSS initiated discussions with the Board regarding the requirement for notarized signatures and continues to follow up with the Board. However, changing the form is incumbent upon the State Board of Health.

D.2.2.4 Recommendation: Lack of Use of Administrative Process for Paternity and Order Establishment

Agree, depending upon Legislative actions. The DWSS fully supports this recommendation and would welcome administrative processes through which the paternity and order actions could be accelerated.

D.2.2.5 Recommendation: Conclusive Presumption of Paternity Establishment

Agree, depending upon Legislative actions.

D.2.2.6 Recommendation – Use of Voluntary Paternity Acknowledgement and In-Hospital Paternity Acknowledgement

D.2.2.6.a Agree, depending upon Legislative actions as well as the availability of funding and resources.

D.2.2.6.b Agree, depending upon Legislative actions as well as the availability of resources in regard to regionalization. The DWSS is currently partnering with the local district attorney's offices and the Office of Vital Statistics.

D.2.2.6.c Agree.

D.2.2.6.d Agree. The DWSS is currently researching document imaging solutions which will benefit case management globally. This is also dependent on legislative approval of funding and resources.

D.2.2.7 Recommendation: Contract Attorney Program

The DWSS agrees the concept of contract attorneys merits further analysis and, if appropriate, may benefit the program. However, the concept is significantly different from the State's current model of the Office of the Attorney General providing agency legal services and implementation would be dependent upon legislative approval, if necessary, and availability of funding and resources.

D.2.2.8 Recommendation: Outsource Service of Process

Agree. The DWSS agrees private processor servers are often more successful than local law enforcement in serving child support documents. DWSS is currently exploring the feasibility of a statewide process server contract. This is also dependent upon available funding.

D.2.2.9 Recommendation: Standardization of the Use of the Nevada Average Wage (as Last Resort)

The DWSS agrees the Nevada Average Wage should be used as a last resort when establishing child support obligations. The DWSS amended state policy in January 2005 allowing the use of occupational wage standards, similar to this recommendation, to determine income before resorting to the use of the Nevada Average Wage.

D.2.2.8 Recommendation: Institute the Creation of "In-House" General Counsel

The DWSS agrees there may be a benefit to in-house counsel, however, NRS 228.110 requires the Office of the Attorney General provide legal services to Executive Branch agencies. This recommendation requires legislative action.

D.3 ENFORCEMENT

D.3.2 RECOMMENDATIONS

D.3.2.1 Recommendation: Establishment of Performance Measurement Standards Across the State

1. Agree, depending upon legislative actions regarding program restructure. The DWSS has developed a supervisory review process which is utilized and available to our county partners.
2. Agree, depending upon legislative actions regarding program structure and available funding and resources.

D.3.2.2 Recommendation: Creation of a Centralized Employer Maintenance Team/Unit

The DWSS agrees, depending on legislative approval of adequate staff, funding and resources.

D.3.2.3 Recommendation: Implementation of Electronic Income Withholding Orders for the Military

The DWSS agrees, depending on legislative approval of adequate funding and resources.

D.3.2.4 Recommendation: Creation of a "Point of Contact" Individual for Outreach to the Military Bases

The DWSS agrees, depending on legislative approval of restructuring and adequate funding and resources. However, neither the state or counties report they have not had a problem communicating with the military bases.

D.3.2.5 Recommendation: Elimination of Duplicate Income Withholding Orders

Agree. Work items are currently pending to address income withholding concerns. Central Office's ability to be responsible for review and clean up is dependent upon legislative approval of adequate funding and resources.

D.3.2.6 Recommendation: Automation of the Unemployment Benefit Intercept Process

Agree, depending upon availability of resources and cooperation of Department of Employment, Training and Rehabilitation.

D.3.2.7 Recommendation: Provide New Enforcement Tools

D.3.2.7.a The DWSS agrees to consider rejoining the Child Support Lien Network (CSLN) depending on the availability of funding and resources. Previously CSLN was unable to secure the participation of Nevada's major insurance carriers, resulting in termination of the agreement. CSLN has been successful in Eastern states because there are state statutes requiring insurance carriers to match with child support.

D.3.2.7.b Agree, dependent upon available funding and resources.

D.3.2.8 Recommendation: Increase Understanding and Use of Long Arm Jurisdiction

Agree, dependent upon available funding and resources.

D.3.2.9 Recommendation: Elimination of Backlog of Outstanding Warrants

The DWSS agrees to consider a policy change and work with the counties, depending on availability of resources and cooperation of stakeholder agencies. However, there needs to be further exploration of the legal aspects at the local level.

D.3.2.10 Recommendation: Centralization of FIDM

The DWSS agrees, depending upon available funding and resources. DWSS has already engaged the county partners in discussions regarding assumption of this responsibility.

D.3.2.11 Recommendation: Clean-Up of Alerts

The DWSS agrees, depending upon adequate funding and resources.

D.3.2.12 Recommendation: Improvements to Nevada's Interstate Case Registry (ICR)

D.3.2.12.a Agree. However, this requires legislative action.

D.3.2.12.b Agree, depending upon adequate funding and resources.

D.3.2.12.c Agree, depending upon adequate funding and resources.

D.3.2.12.d Agree, depending upon adequate funding and resources.

D.3.2.13 Recommendation: Expand Nevada's Medical Support Enforcement Coverage

D.3.2.13.a Nevada already has submitted a bill draft request regarding medical support for the 2007 legislative session.

D.3.2.13.b NOMADS does have a medical cash capability. Nevada allows, and child support hearing masters already do order medical coverage against either parent based on case circumstances. Nevada policy regarding medical support will be updated further upon issuance of final federal medical support regulations.

D.3.2.13.c Agree, depending on adequate funding and resources.

D.3.2.14 Recommendations: Improvements to an Overall Proactive Enforcement Approach

D.3.2.14.a. The DWSS agrees depending on adequate funding and resources.

D.3.2.14.b. There is a work item pending for this recommendation.

D.3.2.14.c. The DWSS agrees.

D.3.2.14.d. The DWSS agrees, depending upon adequate funding and resources.

D.4. CASE MANAGEMENT

D.4.1 FINDINGS

D.4.1.5 Finding: Policy & Procedures (P&P)

The DWSS believes it has developed an effective means by which policy and procedures (P&Ps) are published and disseminated to IV-D staff. Information is published on the state web-site which provides immediate access. P&Ps are time limited documents which are incorporated into policy within two months of issuance.

D.4.2 RECOMMENDATIONS

D.4.2.1 Recommendation: Case Processing

Agree, if adequate funding and resources are available. Additionally, the DWSS schedules monthly teleconferences and regular face-to-face meetings with the DA and PAO offices to facilitate communication between all IV-D offices.

D.4.2.2 Recommendation: Improved CSE Manual

D.4.2.2.a Agree, depending upon adequate funding and resources.

D.4.2.2.b DWSS issues policy every two months consistent with agreements with IV-D partners. The revision date is located in the header of each page of the Manual update.

D.4.2.2.c DWSS will review the MTL practices to ensure they are consistent with the Public Assistance manuals.

D.4.2.3 Recommendation: Improved Distinction Between Policy & Procedure

The policy manual is currently been reviewed and updated in its entirety to provide clear policy and omit procedural information. Procedures are left to the discretion of the local offices, so long as policy is adhered to.

D.4.2.4 Recommendation: Improved Use and Identification of Policy and Procedures (P&P)

D.4.2.4.a Agree. Local offices should have a clear procedure in place to request a P&P.

D.4.2.4.b The DWSS has an existing numbering method which does identify Policy and Procedure Inquiries. P&Ps are further identified by subject matter and policy manual section.

D.4.2.4.c The DWSS issues policy every two months consistent with agreements with IV-D partners. The revision date is located in the header of each page of the Manual update.

D.5 AUTOMATION

D.5.1 FINDINGS

D.5.1.4 Finding: Replacement of NOMADS

As of April 2006 there were 583 Public Assistance open work items waiting to be fixed, as a comparison to the Child Support work items presented. In 2005, there were 99 Public Assistance work items fixed and promoted to NOMADS. In 2006, there were only 77 Public Assistance work items fixed and promoted, as of April 26, 2006.

D.5.2 RECOMMENDATIONS

D.5.2.1 Recommendation: Re-Institute the Alerts Workgroup

D.5.2.1.a Agree, depending upon adequate funding and resources.

D.5.2.1.b Agree.

D.5.2.1.c Agree, depending on adequate funding and resources.

D.5.2.2 Recommendation: Support of Improved Document Generation Solution and Centralized Printing of Documents

D.5.2.2.a Agree. The DWSS is in the process of implementing a document management system. This is limited by funding and resource constraints.

D.5.2.2.b Agree, depending on adequate funding and resources are available.

D.5.2.3 (a & b) Recommendation: Implementation of Expanded Use of Imaging Technology

Strongly agree, depending on adequate funding and resources. This may create one of the single greatest improvements in performance and productivity.

D.5.2.4 Recommendation: Advance Planning in Anticipation of New System

D.5.2.4.a Agree, depending on adequate funding and resources. A feasibility study should be conducted how to best replace NOMADS.

D.5.2.4.b The DWSS agrees there may be value in separating system functionality between the Public Assistance and IV-D aspects of NOMADS. However, the DWSS believes there is great value in remaining on a common data base.

D.5.2.4.c Agree.

D.5.2.4.d Agree, depending on adequate funding and resources.

D.5.2.4.e Agree, depending on adequate funding and resources.

D.5.2.4.f Agree, depending on adequate funding and resources.

D.6 REPORTS

D.6.2 RECOMMENDATIONS

D.6.2.1 Recommendation: Creation of a Reports Workgroup

D.6.2.1.a Agree, depending on adequate funding and resources.

D.6.2.1.b Agree, depending on adequate funding and resources.

D.6.2.1.c Agree, depending on adequate funding and resources.

D.6.2.2 Recommendation: Re-evaluation of Current Work Item Process and Dedicated IV-D Resources

D.6.2.2.a Agree, depending on adequate funding and resources.

D.6.2.2.b Agree, depending on adequate funding and resources.

D.6.2.2.c Agree. The Work Item Committee is already doing this.

D.7 IT STRATEGIC PLAN

D.7.1 Recommendation: Development and Finalization of an IT Strategic Plan

Agree, depending on adequate funding and resources. Any IT Strategic Plan should be aligned with a business plan.

D.8 TRAINING

D.8.2 RECOMMENDATIONS

D.8.2.1 Recommendation: Implementation of a IV-D Training Academy

D.8.2.1.a The DWSS strongly agrees with this recommendation and has derived great benefit from the public assistance academy. However, this is dependent upon adequate funding and resources.

D.8.2.1.b Agree, depending upon legislative actions regarding program structure and adequacy of funding and resources.

D.8.2.2 Recommendation: Creation of a Training Officer II Position for IV-D

D.8.2.2.a It is agreed it would be of benefit to have trained Trainers in the IV-D arena. However, this is dependent upon the creation of positions, adequate funding and resources.

D.8.2.2.b Agree, depending upon the availability of resources.

D.8.2.2.c Agree.

D.8.2.3 Recommendation: Provide Effective Training Tools

D.8.2.3.a. Disagree. All workers can access the CSE 101 training on the password protected DWSS website.

D.8.2.3.b Agree, depending on adequate funding and resources.

D.8.2.3.c Agree, depending on adequate funding and resources.

D.8.2.3.d Agree, based on adequate funding.

D.8.2.4 Recommendation: Provide Effective System Training

Agree, depending on adequate funding and resources.

D.8.2.5 Recommendation: Implement a Means of Measuring Effectiveness of Training

Agree, depending on adequate funding and resources.

D.8.2.6 Recommendation: Development of a Mentoring Program

Agree, depending on adequate funding and resources.

D.9.2 RECOMMENDATIONS

D.9.2.1 Recommendation: Necessity of a Well-Developed, Well-Defined DWSS Strategic Plan

D.9.2.1.a Agree, the DWSS has drafted an outline and is in the process of developing a draft which will be shared with all IV-D partners.

D.9.2.1.b Agree.

D.9.2.1.c Agree, depending on adequate funding and resources.

D.9.2.2 Recommendation: Creation of a Child Support Oversight Committee

The DWSS has, for some time, conducted regular meetings amongst the state and county IV-D leadership to discuss program direction, establish priorities, IT approaches, and future possibilities. This is referred to as the IV-D Planning Meetings. To the extent this is tied to regionalization, is dependent upon legislative approval.

D.9.2.3 Recommendation: Creation of a IV-D Help Desk

The DWSS currently employs a progressive Help Desk strategy by which callers are connected to the appropriate resource for problem resolution.

D.9.2.4 Recommendation: Empowerment of IV-D Chief

D.9.2.4.a The IV-D Chief has had and continues to have full leadership responsibility and decision-making authority.

D.9.2.4.b All program chiefs, including the IV-D Chief, meet weekly with the Deputy Administrator to provide status reports on their respective programs.

D.9.2.5 Recommendation: Supervision of IV-D Staff in the PA District Offices

D.9.2.5.a The DWSS analysis suggests supervision of IV-D in the Public Assistance offices (the office management) works effectively and promotes harmonious relations and a better understanding of both programs improving worker performance and fulfillment cross program responsibilities. In the event of regionalization, the DWSS concurs reevaluating the reporting structure.

D.9.2.5.b The DWSS analysis suggests supervision of IV-D in the Public Assistance offices (the office management) works effectively and promotes harmonious relations and a better understanding of both programs improving worker performance and fulfillment cross program responsibilities.

D.9.2.5.c Agree. These are duties they currently perform.

D.9.2.6 Recommendation: Improvement of Inter-Office Communication - Clark and Washoe Counties

D.9.2.6.a The DWSS defers to county responses.

D.9.2.6.b The DWSS defers to county responses.

D.9.2.6.c The DWSS defers to county responses.

D.9.2.6.d. The DWSS provides IV-D staff with a full listing of contact information for all state and county IV-D staff each month. Additionally IV-D staff are co-located in Public Assistance offices to facilitate communications between the programs. Counties have acknowledged by using specific staff for IV-D support services, timeliness and follow up concerns have been greatly reduced.

D.10 PERFORMANCE MEASUREMENTS

D.10.2 RECOMMENDATIONS

D.10.2.1 Recommendation: Establishment of Performance Measurement Standards for All IV-D Staff

D.10.2.1.a Agree. The DWSS is currently developing new work performance standards for the DWSS IV-D case managers. The DWSS Work Performance Standards (WPS) System has been made available to IV-D partners; the DWSS continues to encourage partners to utilize this tool.

D.10.2.1.b Agree. The DWSS is currently developing new work performance standards for the DWSS IV-D case managers. The DWSS Work Performance Standards (WPS) System has been made available to IV-D partners; the DWSS continues to encourage partners to utilize this tool.

D.10.2.1.c Agree. The DWSS is currently developing new work performance standards for the DWSS IV-D case managers. The DWSS Work Performance Standards (WPS) System has been made available to IV-D partners; the DWSS continues to encourage partners to utilize this tool.

D.10.2.1.d Agree. This is currently the practice of the DWSS.

D.10.2.1.e Agree.

D.10.2.2 Recommendation: Hold All Staff Accountable

D.10.2.2.a Agree. This is a current practice of the DWSS through required State Personnel rules.

D.10.2.2.b MAXIMUS recommends that 'incentives could be offered for the higher performing employees'. Please provide details regarding this recommendation.

D.10.2.3 Recommendation: Improvement to Communication Regarding Performance

D.10.2.3.a The DWSS is open to improved methods of communication and is unaware where it is lacking.

D.10.2.3.b The DWSS defers to county responses.

D.10.2.3.c The DWSS defers to county responses.

D.10.2.4 Recommendation: Provide Case Management Reports

See response to Section D.6

D.10.2.5 Recommendation: Establish Standardization

D.10.2.5.a MAXIMUS provides a declaratory statement rather than a recommendation in this subsection.

D.10.2.5.b The DWSS currently publishes the Nevada State Child Support Enforcement Manual, NOMADS Task Guide, and Index of Policy & Procedure Releases on the DWSS website. Additionally, other valuable information and reports are accessible on the website. The DWSS website is available to every child support case manager. For specific desk guides, DWSS defers to the county partners.

D.10.2.5.c The DWSS QC has developed and disseminated ME Review Forms which identify policy citations and related NOMADS screens subject to review. QC Reviewers currently follow established review guidelines and procedure outlined in the Child Support Self Assessment Training Manual.

D.10.2.5.d The DWSS defers to county responses.

D.10.2.6 Recommendation: Strengthen the Role of the DWSS Central Office

D.10.2.6.a It may be necessary to restructure the Interlocal Contract agreements with each County; current contract language inhibits the ability of DWSS to mandate internal business processes to County operations. This is dependent on adequate funding and resources.

D.10.2.6.b The DWSS is currently exploring the development of a IV-D Training Academy which will include the development of training guides and other helpful tools.

D.10.2.6.c Agree, contingent upon legislative action and adequate funding and required resources.

D.10.2.7 Recommendation: Change Primary Focus from Policy Adherence to Federal Performance Outcomes

D.10.2.7.a Strongly disagree. Prior to January 1, 2005, the various District Attorney's offices determined how they would monitor their office's performance and set their own priorities. In fact, prior to the new contract, the statewide program focus was on performance outcomes and Nevada declined in national performance rankings. During that time frame, Nevada was under penalty status for data reliability concerns. A new contract with the District Attorneys took effect January 1, 2005 which emphasized the State's authority over the Program. In early 2006, the DWSS adopted a process of management evaluations which included ensuring policy adherence. Since this new process of policy adherence has been in effect for less than one year, the final results of Nevada's management evaluations and reviews and the impact on performance is yet to be determined. However, preliminary data indicates performance outcomes have improved, particularly in the area of paternity establishment, which has been a challenge for Nevada the past several years. In addition, Nevada passed data reliability in Federal Fiscal Year 2005, thereby ceasing the accruing penalties.

The DWSS continues to conduct annual Federal Self Assessment Reviews for each county operation in compliance with 45 CFR 308. The Federal Self Assessment Review is focused on the following performance outcomes; Case Closure; Establishment of Paternity; Enforcement of Orders; Disbursement of Collections; Securing and Enforcing Medical Support Orders; Review and Adjustment of Orders; Interstate Services; and Expedited Process. State policy adherence serves as a blueprint for achieving federal performance outcomes.

D.10.2.7.b Agree, as stated in MAXIMUS Finding D.10.1.7, "While the Federal Self Assessment Review is focused on federal compliance and performance, the ME Review is focused on state policy adherence." The DWSS currently conducts an annual Management Evaluation Review (state policy adherence) and an annual Federal Self Assessment Review pursuant to 45 CFR 308. The Federal Self Assessment Review is focused on the following performance outcomes; Case Closure; Establishment of Paternity; Enforcement of Orders; Disbursement of Collections; Securing and Enforcing Medical Support Orders; Review and Adjustment of Orders; Interstate Services; and Expedited Process. State policy adherence serves as a blueprint for achieving federal performance outcomes. Both state policy adherence and federal performance outcomes are measured annually.

CHAPTER E—BEST PRACTICES

The DWSS appreciates the provision of the information contained in this chapter, but has no comment.

CHAPTER F – IMPLEMENTATION PLAN

Any implementation plan is dependent upon legislative determination of the future of the Child Support Enforcement Program in Nevada.