State of Alaska

Department of Revenue

Child Support Services Division

NSTAR Modernization Planning Project

Gap Analysis

FINAL

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Document Revision History

Amendment Record

Date	Author	Version	Description of Change
05/19/2014	Informatix	1.0	Initial deliverable submittal
05/27/2014	Informatix	2.0	Updated the document with feedback, comments and changes from CSSD
06/20/2014	Informatix	2.1	Updated with comments from CSSD reviewers.
06/26/14	Informatix	2.2	Updated with one comment from CSSD.
07/2/2014	Informatix	2.3	Updated with one comment from CSSD.
7/3/2014	Informatix	2.4	Updated with one comment from CSSD.

Terminology

Term	Definition
157	OCSE Child Support Enforcement Annual Data Report
34A	OCSE Child Support Enforcement Program Collection Report (Quarterly)
ACH	Automated Clearing House
ACOMS	Alaska Corrections Offender Management System (DOC System)
ADABAS	Adaptable DAta BAse System
ADE	Automated Data Exchange
AEI	Administrative Enforcement Intergovernmental
AG	Attorney General
ALOG	User Access Log
ARIES	Alaska's Resource for Integrated Eligibility Services (DHSS EIS Replacement)
ASO	Administrative Support Order
CASS	Coding Accuracy Support System
CCPA	Consumer Credit Protection Act
CFI	Case File Imaging
CFR	Code of Federal Regulation
CIB	Children's Insurance Benefits
CICS	Customer Information Control System
CIS	Content Integration Suite

Term	Definition
COAP	Compromise of Arrears Program
COBOL	Common Business Oriented Language
CP	Custodial Parent
CSE	Child Support Enforcement
CSENet	Child Support Enforcement Network
CSSD	Child Support Services Division
DBMS	Database Management System
DFAS	Defense Finance and Accounting Services
DISCFS	DISC FS (new name for IKON imaging)
DMV	Division of Motor Vehicles (Department of Administration)
DOC	Department of Corrections
DOL	Department of Labor or Department of Law
DJJ	Department of Juvenile Justice
DOR	Department of Revenue
DPA	Division of Public Assistance (Department of Health and Social Services)
EFT	Electronic Funds Transfer
EIS	Public Assistance Eligibility Information System
ELMO	Electronic Review of Support Orders Leading to Modification
ETIVE	ETRAN for Foster Care IV-E
ETRAN	Electronic Transaction Notification from Division of Public Assistance
ETS	Enterprise Technical Services
FC	Foster Care
FCE	Federal Collections and Enforcement (formerly known as FOP)
FCR	Federal Case Registry
FIDM	Financial Institution Data Match
FPLS	Federal Parent Locator Service
FOP	Federal Offset Program
FTI	Federal Tax information
HHS	U.S. Department of Health and Human Services
HSS	State of Alaska Department of Health and Social Services (DHSS)
IAT	International ACH Transaction
ICL	Image Cash Letter
Interstate	Formerly used term, now referred to as Intergovernmental
IRG	Intergovernmental Reference Guide
IVA (or IV-A)	SSA Title IV-A program/agency: Welfare Administered by DPA
IVD (or IV-D)	SSA Title IV-D program/agency: Child Support Administered by CSSD
IVE (or IV-E)	SSA Title IV-E program/agency: Foster Care Administered by OCS
IVR	Interactive Voice Response
MICR	Magnetic Ink Character Recognition

Term	Definition
MS	Microsoft
MSFIDM	Multi State Financial Institution Data Match
MSO	Monthly Support Obligation
MyAlaska	Single point secure sign-on for State of Alaska services
NACHA	National Automated Clearing House Association
NCP	Non-Custodial Parent
NDNH	National Directory of New Hires
NECSES	New England Child Support Enforcement System
NFIN	NSTAR Financial System
NMSN	National Medical Support Notice
NPA	Non-Public Assistance
NSF	Non-Sufficient Funds
NSTAR	Northern Support Through Automated Resources
NTANF	Tribal Temporary Assistance to Needy Families (Tribal TANF)
OCS	Office of Children's Services
OCSE	Office of Child Support Enforcement
OLS	Occupational License Suspension
PCN	Position Control Number
PFD	Permanent Fund Dividend
PMAJ	Post Majority support
QC	Quality Control
RFP	Request For Proposal
ROFO	Registration of Foreign Order
ROP	Recognition of Parentage
SDU	State Disbursement Unit
SLA	Service Level Agreement
SME	Subject Matter Expert
SQL	Structured Query Language
SSO	State Security Office
SSP	OCSE State Services Portal
TANF	Temporary Assistance to Needy Families
URA	Unreimbursed Assistance
USPS	United States Postal Service
WID	Withhold Income and Deliver (wage withholding order)

Deliverable Approval

Futaris, Inc. presents the Gap Analysis document for the Alaska Department of Revenue (DOR) Child Support Services Division's (CSSD's) NSTAR Modernization Planning Project for your review and approval.

The Gap Analysis document has been reviewed by the DOR-CSSD and fully meets the objectives expressed by the DOR-CSSD and Futaris, Inc. and is now subject to formal change control.

Signature: Michele B _____ 9-8-14

Michele Blanc — Date

Informatix, Inc.

Signature: Tony Vita _____ 9/5/2014

Tony Vita — Date

Alaska Department of Revenue, Child Support Services Division

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Gap Analysis Approach

The State of Alaska, Department of Revenue (DOR), Child Support Services Division (CSSD) has begun efforts to modernize NSTAR, its 15-year-old mainframe child support services case management system. In May 2012, CSSD submitted a Planning Advance Planning Document (Planning APD or PAPD) to the federal Office of Child Support Enforcement (OCSE). In May 2014, an assessment of current, as-is business processes was completed. Both business process and NSTAR system issues were identified during the documentation of current business processes. These issues exemplify the need to modernize CSSD's child support system.

The next step in the NSTAR Modernization Planning Process (NMPP) is a gap analysis to summarize the differences between the current and future states. The Gap Analysis document provides an analysis of the gaps between the "as-is" business processes and the "to-be" CSSD-provided functional requirements. Reference material used in the gap analysis includes the following:

- State of Alaska, Department of Revenue, Child Support Services Division, NSTAR Modernization Planning Project, Functional Requirements, February 21, 2013, Version 55
  - This document is considered the to-be model for purposes of the gap analysis. The CSSD-provided functional requirements include the OCSE requirements and Alaska-specific requirements primarily related to financial management.
- OCSE's Automated Systems for Child Support Enforcement: A Guide for States
  - The requirements in this guide are also part of the functional requirements in the previous bullet.
- State of Alaska, Department of Revenue, Child Support Services Division, NSTAR Modernization Planning Project, Business Process Analysis, Version 4.2, May 12, 2014
  - This is the current version of the document at the time the gap analysis was documented.
- CSSD interview and meeting notes
  - These notes supplement information that was summarized in the Business Process Analysis document.
- State of Alaska, Department of Revenue, Child Support Services Division, Planning Advance Planning Document for Alaska Child Support Services Division Case Management System NSTAR Modernization
  - The Planning APD was submitted to the US Department of Health and Human Services, Administration for Children and Families, Office of Child Support Enforcement by CSSD, and is dated May 7, 2012.

The gap analysis represents a point-in-time view of business processes and functional requirements. Additional general and specific gaps may be identified during future NSTAR Modernization Planning Project activities and during development of deliverables including:

- Finalization of the Requirements Traceability Matrix (RTM)
- Preparation of the Implementation Advance Planning Document (IAPD)
- Preparation of the Request for Proposals (RFP) for acquisition of a new system

Requirements definition workshops were conducted concurrently with preparation of the gap analysis. Gaps identified during the workshops were incorporated as system requirements. Any additional gaps that may be identified during future NMPP activities will be analyzed and incorporated into the RTM, IAPD, and RFP as appropriate and approved by CSSD.

Purpose of the Gap Analysis

The gap analysis provides input for the "define the problem" section of the Feasibility Study deliverable. When developed and written, this section of the Feasibility Study will contain "the problems with the current system (previously stated in the Planning APD)… Problems may be functional—that is, the system may be incomplete, not fulfilling all the program requirements. Problems may be technical— for example, the system may be too slow, sized too small, or be obsolete and inefficient in terms of hardware or software. Problems may also relate to system cost or to access, limiting the ability of personnel to use system information to full potential."[1]

To a great degree, NSTAR's limitations are driving the way CSSD performs its work and creating challenges that would not exist with a modern system.

Aligning with problems stated in the Planning APD, the gap analysis is intended to impart a sense of what the NSTAR system does and does not do, and how this aging system affects CSSD's mission in the collection and disbursement of child support payments.

Although NSTAR meets certification needs as it exists today, it does not meet the needs of the Alaska child support program.

While CSSD's system is certified as compliant for both the Family Support Act (FSA) and the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA), CSSD is confronted with the following:

- Obsolete information technology and database structures in danger of being unsupported in the near future, even with the valiant efforts of skilled and dedicated IT resources
- Manual intervention that is time-consuming and prone to human error, even with detail-oriented staff and quality control measures in place

These two factors—old technology and manual workarounds—comprise a common theme that defines the problems requiring modernization. These two factors underlie the gaps identified herein.

While there is debate about whether IT should drive the business model or the business model should drive IT, the business goals and needs of the organization should fundamentally be met by its information technology systems. CSSD's mission, goals, and work functions should be supported by NSTAR. However, the opposite is largely true for CSSD today given the capabilities of NSTAR.

CSSD operates under the constraints of a state government with limited resources. Making the best use of resources can be challenging when relying on old technology. There is considerable difference in the time and effort it takes to accomplish tasks using an antiquated system, when compared with using a modern system.

[1] Department of Health and Human Services, Administration for Children and Families, Feasibility, Alternatives, and Cost/Benefit Analysis Guide

For example:

- NSTAR customer service users are not clicking on a link to view case information—they are paging through multiple screens and looking up unfamiliar code abbreviations in desk manuals and other documentation.
- Lacking automated functionality for bank reconciliation and reporting, financial staff must piece together information from miscellaneous sources, create an Excel spreadsheet, print copies of the spreadsheet and bank records, and then, using eyes and hands, must compare and check off amounts line by line.
- Data processing team members spend time doing data fixes and writing programs to extract information from an outdated, flat database structure that is not able to recognize or enforce data relationships. The burden of understanding and maintaining a mission-critical system falls to a small, dwindling team. They face daily database battles that would not exist with a relational database management structure.

A technically modern system that efficiently and effectively supports the business functions and needs of all stakeholders will allow CSSD to make better use of its resources.

Migration to current industry-standard technologies will improve CSSD's ability to sustain and enhance its successful child support enforcement program, allowing caseworkers more time for casework, giving staff access to relevant and reliable reports, and broadening the pool of information technology professionals available to provide ongoing application support.

Summary of Gaps by Category

In the Request for Proposals for the NSTAR Modernization Planning Project, CSSD has stated that, "NSTAR Modernization is intended to enhance worker efficiency and increase child support collections, by reducing complexity, increasing accuracy, improving usability, and providing expanded access to all valid users."

Over the years, CSSD has patched gaps in these areas with creative solutions, some within NSTAR and some outside of the system. CSSD staff has successfully endeavored to work within the limitations of NSTAR to ensure children receive reliable support. CSSD has consistently operated a program that is compliant with Federal and Alaska's State regulations. The NSTAR system has been certified as compliant for both the Family Support Act (FSA) and the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA).

NSTAR is well supported by CSSD's data processing group, even though it is based on outdated technology. As needs arise, CSSD has implemented manual processes and workarounds to compensate for system deficiencies to support necessary, required business functions. These deficiencies or gaps are primarily the result of a lack of automation due to NSTAR's inflexible technology.

Gaps have been summarized in this document, to offer a concise picture of the key problems that CSSD faces in its reliance on a system based on outdated technology. Gaps are organized into general categories as follows:

- Usability Gaps—gaps in how users interact with the system
- Functionality Gaps—gaps in how CSSD's business needs are supported or not supported
- Forms and Reports Gaps—gaps in how necessary output on forms or in reports is accomplished
- Interface Gaps—gaps in how interfaces support or fail to support business needs

- System Enhancements and Maintenance Gaps—gaps in system management due to outdated technology

Usability Gaps

NSTAR presents usability challenges for both seasoned and new/infrequent system users. Gaps in usability were determined by analyzing the NSTAR user experience and relevant excerpts from the International Organization for Standardization (ISO) standards. ISO's definition of usability is:

> **Usability**: the capability of the software product to be understood, learned, used and attractive to the user, when used under specified conditions.

Specifically, ISO 9241 provides requirements and recommendations relating to the attributes of systems that contribute to usability and the ergonomic principles underlying them. The following table provides the parts of the ISO 9241 standards that were considered in the analysis of NSTAR usability gaps.

ISO 9241 Part	Description
11	This part deals with the extent to which a product can be used by specified users to achieve specified goals with effectiveness, efficiency and satisfaction in a specified context of use.
12	Presentation of information. This part contains specific recommendations for presenting and representing information on visual displays. It includes guidance on ways of representing complex information using alphanumeric and graphical/symbolic codes, screen layout, and design as well as the use of windows.
13	User guidance. This part provides recommendations for the design and evaluation of user guidance attributes of software user interfaces including Prompts, Feedback, Status, On-line Help and Error Management.
14	Menu dialogues. This part provides recommendations for the ergonomic design of menus used in user-computer dialogues. The recommendations cover menu structure, navigation, option selection and execution, and menu presentation (by various techniques including windowing, panels, buttons, fields, etc.).
16	Direct manipulation dialogues. This part provides recommendations for the ergonomic design of direct manipulation dialogues, and includes the manipulation of objects, and the design of metaphors, objects and attributes. It covers those aspects of Graphical User Interfaces that are directly manipulated, and not covered by other parts of ISO 9241.

Representative usability gaps include the following:

- The NSTAR system is complicated and has significant gaps in the effectiveness of its use. For example:
  - Financial staff page through screens to locate information that is necessary to complete work functions. This includes all aspects of historical data and adjusted case balances, transactions, assignments, and unreimbursed assistance for members.
  - Customer Service staff must go to multiple screens to get relevant case information when providing assistance.

- NSTAR lacks a user-friendly method to decipher and search for Activity Codes, Reason Codes, and combinations of these codes.
- The time to complete many tasks is excessive. For example, on a regular basis, Customer Service personnel verify and update client demographic information such as addresses, phone numbers, names and dates of birth. The speed at which this information can be located, verified, and updated (if needed) is impeded by the fact that it is housed on multiple screens in NSTAR.
- There is a gap in overall user satisfaction with NSTAR. Workers are familiar with web-based systems and the benefits of modern technologies. Working on an outdated system lessens professional fulfillment and personal satisfaction.
- NSTAR navigation is not user friendly. Screen names are not intuitive. With over 400 screens in the system, information is difficult to find.
- There are deficiencies in screen layout. Screen layouts are cumbersome and in some cases not relevant for the information that the worker is seeking, creating the need to page through several screens to obtain relevant information.
- Drill-down functionality is limited. Workers can drill down on a few NSTAR screens, but it is difficult to understand and learn how to do this.
- NSTAR is code intensive. Workers who are not familiar with all of the codes have to refer to reference materials to avoid entry of incorrect codes. When viewing screens, codes are difficult to interpret, especially for less experienced staff.
- NSTAR does not have an intuitive user interface. The “green-screen” user interface limits the ability of workers to simultaneously view multiple screens and access multiple cases. NSTAR is not a modern system with a graphical user interface (GUI).
- NSTAR lacks online help and knowledge management capability. Workers must refer to an extensive collection of desk manuals that CSSD has developed to assist with use of the NSTAR system as well as how to accomplish system workarounds.
- The learning curve for NSTAR is high. A limited number of CSSD staff understands all of its capabilities. For new staff, the problem is compounded by the simultaneous learning curve to master NSTAR use, child support program business functions, and CSSD manual processes/NSTAR workarounds.

Functionality Gaps

NSTAR’s aging and inflexible technology has had widespread influence on how CSSD operates the State’s child support program. Daily work activities are determined by complex interactions with NSTAR and time-consuming processes accomplished outside of the system for functionality NSTAR does not support.

When new child support program requirements need to be implemented, functionality cannot be added to NSTAR. CSSD adds or modifies manual procedures to accomplish the desired end result since NSTAR is not technically able to be responsive to their needs. There are hundreds of these manual processes and workarounds that staff then must be trained on and remember to use correctly.

Representative functionality gaps are summarized below.

- NSTAR does not fully support CSSD business functions. CSSD sections are dependent on the use of ancillary tools, applications, and workarounds to support the completion of casework and reporting. Particularly in Financial Management, NSTAR has incomplete and faulty functionality. For example:

- NSTAR does not support or report on bank reconciliation. Bank reconciliation is an intensively manual and resource-intensive process accomplished using spreadsheets and manual comparison of numbers.
- There are issues with EFT processing that require workarounds for processing the ACH file.
- The Audit and Adjustments section relies heavily on MS Excel to complete its activities and work products.
- The internal auditor uses MS Excel and Access, along with manual comparisons, to complete required reports.
- While the system can be used for some corrections needed to an account, other corrections must be done as an audit using an Excel spreadsheet rather than as part of the NSTAR system.
- The Establishment section uses a checklist created in MS Word to track work that must be completed.
- Address types are limited to two per member ID: mailing and residence. Additional address types are needed.
- CSSD does not meet current United States Postal Service address standards, which creates compatibility issues when interfacing with other agencies and entities, as well as problems addressing mail. NSTAR addresses are not Coding Accuracy Support System (CASS) certified, so CSSD does not qualify for mailing discounts. NSTAR uses outdated COBOL technology and a temporary "compatibility interface" for the Pitney Bowes Finalist data cleansing software rather than an appropriate native driver.

- NSTAR does not have the flexibility to adapt to changing business conditions and legislative mandates. The capability to add functionality or make other changes is restricted by the technology. For example:
  - Cash medical support is not managed well by NSTAR. A member called "cash medical" is set up on the case.
  - The system cannot be modified to accept child support payments over the Internet and/or through the IVR.
- NSTAR does not allow for customization of complex business rules. For example:
  - On enforcement intergovernmental responding cases, Alaska charges interest on arrears balances. Alaska pays principle then interest, but some other states may pay interest then principle. This creates the need to continually audit and reconcile balances between Alaska and other states due to the different distribution options chosen by the states.
  - The system lacks full functionality to support Alaska's unique requirements such as Tribal TANF (NTANF) and Permanent Fund Dividend (PFD) Only.
- There is no routing of a case or workflow. To move a case from Intake to Modifications, for example, a supervisor goes into the system and changes the Position Control Number (PCN) from one worker's number to another worker's number.
- Bulk caseload reassignments is a difficult and resource-intensive process that requires the intervention of an Analyst/Programmer.
- Reminders are manually entered in the system. For example, a reminder code is entered for five days after a modification is scheduled. This occurs more than 3,000 times each year.
- There is no functionality or ability to flag cases with ongoing complaint resolutions, hearings, identity theft issues, and other special conditions.

- NSTAR does not support Administrative Hearings. Administrative Hearings assigns its own case numbers, and there is no cross-reference to the child support cases. There are no alerts to notify the caseworker that 45, 60, or 120 days have passed without a final decision.
- If receipts are applied to multiple cases, NSTAR does not allow the adjustment of multiple receipts for just one case only. These receipts must be adjusted one receipt at a time.
- Only limited case information is available to participants via the state online portal. For detailed information, custodial and non-custodial parents, and other state agencies must contact a child support worker directly.
- NSTAR lacks a web-based self-service capability. Such functionality would allow parties (e.g., parents and employers) to perform activities such as:
  - Submit initial applications for services
  - Track current support and arrears due
  - Update personal information such as address and telephone
  - Download forms and send the completed forms electronically to the caseworker
  - Ability to view payment history and other account information
  - Ability for other jurisdictions to view information
- Management of locate activities is not automated. Gaps in interfaces and lack of system functionality have created profound deficiencies in this important activity.
- Valid and verified addresses are overwritten by the Electronic Transaction Notification from Division of Public Assistance (ETRAN) and ETRAN for Foster Care IV-E (ETIVE).
- Training gaps include:
  - It takes approximately six to twelve weeks of classroom training and many months of production work for a new staff person to become proficient enough to work on their own.
  - Although there is a training region on NSTAR that is available for training, the region is difficult to set up for training. Instead, the trainers use the production environment for training.
- The State Disbursement Unit (SDU) reporting is not automated and relies heavily on MS Excel to complete monthly money holding tracking reports and daily reconciliation reports on collection.

Forms and Reports Gaps

Reporting is important for compliance with Federal requirements including the OCSE 34A and 157 reports. Reporting is an equally important and necessary tool for day-to-day operations. Currently, it is incredibly complex, if not impossible, to develop queries, reports, and subsequent analysis. It is overly time-consuming and resource intensive to respond to special requests for information, spot trends, and identify workplace performance issues.

Representative gaps related to forms and reports include:

- The number of reports generated and printed is excessive. There are approximately 560 standard reports generated from NSTAR. The majority of reports are daily, totaling about 270, including those run Monday through Friday, Sunday through Thursday, and every day. There are 62 weekly reports and 118 monthly reports, with some special scheduling requirements such as the first Friday of the month, 5th of the month, first Saturday, and so forth. There are 22 reports run quarterly. Other report frequencies include those run bi-annually, yearly, and at the end of the Federal fiscal year.

- There is no generalized report writing capability available to case workers, supervisors or managers. Requests for additional reports or ad hoc reports require special programming by the data processing section. This typically results in a request for an Analyst/Programmer to intervene. These reports are often delivered as flat files or in Microsoft Excel.
- NSTAR/mainframe reports are physically printed and distributed daily. The process is labor intensive and time consuming.
- There is limited flexibility in user access profile or security settings for reports. Confidential reports, such as those containing federal tax information (FTI) are not printed in order to comply with IRS requirements. A limited number of users have been granted the security rights to access confidential reports directly in the sysout (system out) archival and retrieval (SAR) library on the NSTAR mainframe.
- Management reporting of statistical information is accomplished primarily through a manual workaround. Some NSTAR batch processes have been programmed to generate statistical information for management reporting. Where no programming exists, staff members collect statistics using Microsoft Excel. The information may pass from a worker to a supervisor, who combines or re-enters statistics and sends an Excel file to a manager. Some of the statistical information is also processed through Microsoft Access.
- There is limited query or data search functionality to assist with case management, caseworker and caseload management, program management, and program evaluation (e.g. the query ability is limited to the criteria built into the filters and a user cannot have a large amount of data to query that it errors out).
- There is no business intelligence capability or dash-board reporting functions that allow users to easily select data and relationships from a data warehouse/repository, and use the information to create and format useful reports.
- The system does not generate a daily report of only those physical receipts that have been entered into the system and are ready to deposit. The report should balance to the deposit slips and to the completed entries for the day. This report should also be on-demand.
- Some of the batch printing can only go to one PCN, causing extra effort to sort through printouts to find needed output.
- NSTAR has no capability to produce information to be used for performance measures to become more efficient (e.g., determine the reason for repeat calls to customer service and take improvement steps such as more staff training). Key operational and programmatic performance indicators must be accessible to management and staff, so that CSE operations can be evaluated for productivity, effectiveness, and efficiency.
- Generation of 157 and 34A reports required by OCSE involves running a special program that provides incomplete data.
- Reporting of Tribal TANF (native TANF) is mostly manual, although tribes send household and warrant information through DPA. Assignments of obligations must be manually adjusted for every open and closed member on Tribal TANF. For example, DPA information is placed on a portal, imported into NSTAR, and compared against the master file. CSSD manually prepares four monthly reports for each of five tribes (matched open, matched closed, non-matched open, and non-matched closed).
- Forms generation is problematic. An ancillary “Automated Forms” system is used for Interstate, Paternity and Admin Subpoena forms. The NSTAR forms generation module, Script/VS, is an unsupported IBM language with limited capabilities.
    - It is inefficient and resource-intensive to update and test Script/VS procedures and requires specialized knowledge to maintain, making it increasingly difficult to find employees with such knowledge.

- Mainframe word processing forms are generated using IBM's Document com position facility (DCF) and Document Library Facility (DLF) and written to a print file. The print file is sent to the printer using Job Control Language (JCL).
- There is no capability to view forms before they are printed. Due to system inconsistencies or difficulties in system use, errors on forms are not detected until they are printed and reviewed the following day, causing the need to regenerate and reprint forms a second time in the subsequent batch cycle.

Interface Gaps

It is recognized that electronically interfacing with state, federal, banking and other related systems is critical to providing efficient child support services. The lack of a Service Oriented Architecture (SOA) and outdated database has prevented CSSD from implementing important interfaces. CSSD experiences significant problems in integrating and interfacing with other state, federal, and tribal systems. Integration of new trading partners or new interfaces is cumbersome and time-consuming, and in some cases, impossible. Some interfaces are out of the question, so information is "interfaced" via reports and then manually keyed into the system.

Representative gaps regarding interfaces include:

- Lack of proper Service Oriented Architecture (SOA) makes integrating CSSD's own external systems difficult and cumbersome:
  - Special programming is required on the mainframe
  - Special programs and tools are used to access the special programs
- Interfacing with other systems that have been upgraded is difficult. For example, the interface to and from the Department of Labor's recently upgraded system and NSTAR has been suspended.
- There is no automated interface between NSTAR and with the Department of Corrections, Alaska Corrections Offender Management System (ACOMS).
- Child Support Enforcement Network (CSENet) interface gaps include:
  - The inability to send more than one referral per day
  - The activity codes entry is not automatic
  - Medical demographics don't always come through correctly
  - Freeform message space is unlimited in CSENet; however, NSTAR can only send and import three readable lines. Additional information (beyond the three lines) is delivered via a daily, printed report.
- NSTAR does not interface with most available locate and enforcement tools, creating manual workarounds for intake, responding Intergovernmental, modifications informal hearings and enforcement. Each group must go gather the data needed, and input that data into NSTAR.
- The employer New Hire Reporting application has to go through a middle-man FTP server to upload new employee records rather than directly adding them.
- Tribal TANF is currently processed manually by CSSD. This should be automated to correctly charge and disburse collections.
- Data coming through the EIS interface is suspect and is verified manually by looking at DPA's system. Changes received in the interface only include the field that has changed and not the person linked to the change. The records are divided by member by batch process and do not show links between a parent and child. This causes confusion when children have differing parents. (Note:

DPA interface for new insurance interface (ARIES) is a new interface in development and testing. Eventually, ARIES will take on all of the current EIS functions.)

- Unreimbursed Assistance (URA) is problematic due to both NSTAR and DPA system issues.
- NSTAR uses triggers from entry screens to send data back to EIS. The code is in the exit program for all of the triggers; however, because of decisions not to send the records for coding errors, records are not sent. This causes intake personnel to send e-mails instead of trusting the system to provide the information that CSSD's caseworkers use to manually update NSTAR.
- There are some important systems that do not interface with NSTAR. Separate login credentials are used to access these systems and obtain data or even make updates to the other systems. Examples are the Department of Motor Vehicles (CSSD users can login and suspend licenses) and the Alaska Department of Fish and Game (for commercial permitting and crew member licensing).
- External employers cannot upload employee information. Data from payroll companies such as Paychex and ADP is received on CDs and uploaded to NSTAR.
- There are synchronization issues with once/week IRS submissions.
- Distribution processing is overly complex due to system limitations.
- Lack of adequate integration between systems creates delays in being able to utilize information. For example, child support payments are processed nightly during batch processing and therefore not available to the Interactive Voice Response (IVR) system or the KidsOnline payment system in real-time.
- Current standards for some interfaces have not been met. Credit Bureau reporting uses the obsolete Metro format rather than the industry standard METRO 2. US Postal Service standards are not used.

System Enhancement and Maintenance Gaps

NSTAR's technical foundation makes it difficult to adapt to changing business conditions and legislative mandates. Data fixes are commonly used to correct processing malfunctions, sometimes taking days.

Representative system enhancement and maintenance gaps include:

- NSTAR does not contain all of its predecessor system's data. The pre-NSTAR's, legacy system must remain active with user access available as needed.
- NSTAR utilizes a rigid, hierarchical database model with inflexible data relationship and access rules, rather than a relational database model. This creates issues with the system being either case or member oriented, when it is preferable to accommodate both views with a single relational model.
- System bugs and fixes are not a priority. Users continue to report system issues knowing that they will most likely not be corrected, or will be assigned low or no priority. Data processing staff time is currently spent keeping the system operational and implementing only the necessary, federally mandated modifications. There are more than 300 pending system bugs and fixes listed in the CSSD Helpdesk Management System (HMS) that have not been addressed due to the lack of resources and time.
- Database limitations include inadequate field lengths that truncate data (e.g., first name and various address fields), restricting case members (to 15) and obligations (to 30).
- The pool of technical resources able to maintain NSTAR continues to decrease and is more difficult to locate. With fewer organizations using COBOL, Natural, or ADABAS, the lack of available skilled personnel to maintain NSTAR is an ever-increasing challenge. As Analyst/Programmers with expertise retire, it is difficult to replace them. This creates a critical risk when key experts leave CSSD. Market trends indicate that many of the existing customers of the development tools of

ADABAS/Natural have either already migrated or are currently in the process of migrating to newer, proven technologies that are easier to support, enhance, and maintain.

- NSTAR lacks a business rules engine. Such capability would enable maintenance of business rules by function and activity, independent of application software and logic. It would allow staff with limited technical experience to develop and maintain business rules.
- When processing large jobs, the system may stop. For example, while attempting to do adjustments that go back for many months, parts of the processing will complete but then stop. If staff can identify what is missing, those parts are manually created. If not, the processing is backed out and an attempt is made to re-run it.
- NSTAR lacks a robust user access and activity tracking capability to ensure that fraud and inappropriate data access are discovered in a timely manner, ensuring compliance with IRS regulations for FTI security. The current tool, ALOG (User Access Log), provides user access and activity tracking but it does not cover every access and is not proactive in the pursuit of inappropriate access.
- There is no method in place to archive older closed cases to reduce the storage space requirements.

In Conclusion

While CSSD's system is certified as compliant for both FSA and the PRWORA, modern, automated child support solutions are available that would remedy CSSD's fragile technical foundation and alleviate its reliance on manual workarounds. CSSD has used NSTAR for many years and has experienced gaps in usability, functionality, forms and reports, interfaces, and maintenance and enhancements.

To build confidence in a modernized system and evaluate potential solutions, CSSD personnel intend to visit other states to see their system in use. The visits will enable CSSD to get a better idea of how these solutions meet state and federal requirements, as well as the business needs of system users.