August 31, 2020

CSSP LETTER: 20-07

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

SUBJECT: ELECTRONIC PAYMENT PROCESSING


PURPOSE: The purpose of this letter is to outline the mandatory and approved methods for the acceptance of electronic payments at the local child support agency (LCSA). The option to accept payment via bank account will be removed and employers and case participants will be directed to register for Expert Pay, a national website for making child support payments, to make payments via their bank account. Electronic payments include payments that are made with a credit/debit card by the parent paying support or a third party remitting a payment on behalf of the parent paying support.

POLICY: Use of the electronic payment methods other than those described below constitute a violation of the Merchant Services Agreement between Department of Child Support Services (DCSS), Conduent (the State Disbursement Unit or SDU) and Wells Fargo (the merchant bank), which has agreed to host the electronic payments being processed within this framework. Any violation of this agreement may subject the State, the SDU, and LCSA workers to investigation by MasterCard or VISA, and could result in fines, penalties, or termination of the electronic payment program.

This letter establishes uniform practices statewide in order to comply with the Payment Card Industry (PCI) Compliance Standards. PCI Compliance Standards are technical and operational requirements set by the PCI Security Standards Council to protect account holder data and/or sensitive authentication data. The Conduent-managed SDU Customer Payment Center is a centralized, PCI compliant operation that will act as an extension of the California SDU for electronic payments only.

BACKGROUND: The acceptance of electronic payments is an important component of overall child support collections. LCSA staff who have completed mandatory training will be able to process electronic payments. Child Support Services Letter 14-05 included the option to accept payments via credit/debit card and bank account.
Effective July 20, 2020 the option to accept payment via bank account will be removed and employer and case participants will be directed to Expert Pay to make payments via their bank account.

ACTION: Here are some actions that will need to be taken by LCSA staff to accept credit/debit card payments from parents paying support.

Customer Call Transfer

✓ LCSA staff will be able to transfer the call to a live agent at the SDU Customer Payment Center.

✓ The only interruption to the transfer will be a brief automated message that provides the remitter a choice of speaking with an English or Spanish-speaking agent, and identifies information needed to complete the payment.

✓ A toll-free number is available to LCSA staff to forward payment calls from their desk to a live agent at the SDU Customer Payment Center. Please note that the ability of staff to transfer calls from their desks varies from office to office, thus this method is limited to offices with this capability. The toll-free number for the SDU Customer Payment Center will be provided in the training materials. The toll-free number is for LCSA staff use only, and must not be given to the customer.

LCSA Website Payment Screen

✓ Using the updated LCSA website payment screen, authorized LCSA staff may enter credit/debit card payment information directly into the SDU Website. A hyperlink has been created to allow authorized staff to access the website payment page from within the Child Support Enforcement (CSE) Participant Overview Page. LCSA staff who will be accessing the web payment page through CSE must first take the mandatory training and receive a certificate of completion before the appropriate security role may be granted by their manager and LCSA System Administrator. In designating staff authorized to process electronic payments, LCSAs must ensure adequate separation of duties.

✓ Training on the call transfer and website payment screen is provided by DCSS Statewide Training Branch. The self-study training module and DCSS Guide to Accepting ePayments, are located on the Blackboard LMS or Child Support Central (CSU) and will include guidance on the most recent PCI standards. The training module is also updated with screen shots that has only credit/debit card as the acceptable method of payment. It also includes payment disclaimer language which needs to be accepted by the customer before processing of the
payment. The details on this process will be included in the training module. The self-study module is a mandatory training for authorized staff who accept electronic payments. All staff who participate in this practice must take the training. A certificate of completion must be provided to the LCSA System Administration prior to receiving the payment collection security role.

Customer Self-Service Tools

✓ California’s Child Support Program continues to rely heavily on self-service tools for accepting customer payments. LCSA staff are reminded to encourage customers to make a payment using the secure California SDU Website and/or Interactive Voice Response (IVR) line. Staff should educate customers on how to access, register, and make a payment using these self-service tools.

To improve security and safety in accepting electronic payments, LCSAs are required to implement the following:

• Use only the above referenced methods to accept electronic payments.

• Restrict access to cardholder data to staff who have completed the mandatory Accepting ePayments training course, received a certificate of completion, and have been authorized by the LCSA to accept electronic payments.

• If staff are not authorized to enter electronic payments online, they must route or transfer calls to someone in the office who has this authority or to the SDU Customer Payment Center. Do not use any other tool to enter electronic payments.

• Remind staff of the penalties for accessing or disclosing personal information for a non-business need.

• Assign functional roles in a manner that establishes adequate separation of duties. If resource constraints prohibit full separation of duties, supervisors must perform timely reviews of electronic payment processing.

• Never write down or copy cardholder information provided by the parent paying support/third party remitter.

• Conduct in-person electronic payment services in plain sight of the person making the payment.
• Return any hard-copy credit/debit card information provided to an LCSA worker directly back to the parent paying support/third party remitter making the electronic payment.

• Ensure that LCSA kiosks and telephones made available to parents paying support/third party remitters provide an adequate level of privacy.

It is important to the Child Support Program to accept electronic payments safely and securely. The direction provided in this letter is an attempt to mitigate risk and meet PCI standards associated with electronic payments. DCSS will monitor this area closely and expect to develop new methods to take advantage of improved technology and reduce risks moving forward.

CONTACT: If you have any questions or concerns regarding this matter, please contact Business Solutions at ccsasbusinesssolutions@dcss.ca.gov.

Sincerely,

o/s

ADAM PERRY
Deputy Director
Operations Division