



# Office of Temporary and Disability Assistance

**ANDREW M. CUOMO**  
Governor

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Commissioner

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Executive Deputy Commissioner

## Administrative Directive

### Section 1

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| <b>Transmittal:</b>                 | 15-ADM-08   |
| <b>To:</b>                          | Local District Commissioners  |
| <b>Issuing Division/Office:</b>     | Division of Child Support Enforcement<br>Center for Child Well-Being  |
| <b>Date:</b>                        | December 28, 2015   |
| <b>Subject:</b>                     | Child Support Security Awareness Training and Nondisclosure Agreement Requirements for All Social Services District Staff and Contract Staff With Access to Child Support Information   |
| <b>Suggested Distribution:</b>      | Child Support Enforcement Unit Coordinators<br>Support Collection Unit Supervisors<br>Temporary Assistance Directors<br>Medicaid Directors<br>Services Directors<br>Foster Care Supervisors<br>Supplemental Nutrition Assistance Program Directors<br>Staff Development Coordinators<br>Title IV-D Attorneys<br>DSS Attorneys |
| <b>Contact Person(s):</b>           | Division of Child Support Enforcement at 800-343-8859, extension 30574<br>Office of Legal Affairs at 518-474-9502   |
| <b>Attachments:</b>                 | <a href="#">Attachment 1 - OTDA-3243: Acknowledgment of Confidentiality of Child Support Information, Including Internal Revenue Service Information</a><br><a href="#">Attachment 2 - Annual Certification of Completion of Child Support Security Awareness Training and Receipt of Signed Non-Disclosure Agreements</a>    |
| <b>Attachment Available Online:</b> | <input checked="" type="checkbox"/>   |

### Filing References

| Previous ADMs/INFs | Releases Cancelled | Dept. Regs.       | Soc. Serv. Law & Other Legal Ref.  | Manual Ref. | Misc. Ref.                                |
|--------------------|--------------------|-------------------|--|-------------|---|
|                    |                    | 18 NYCRR § 347.19 | SSL § 111-v;<br>45 CFR § 303.21;<br>45 CFR § 307.13;<br>42 USC § 654(26);<br>42 USC §654a(d) |             | Internal Revenue Service Publication 1075 |

## Section 2

### I. Summary

This Administrative Directive (ADM) informs Social Services Districts (SSDs) of the release of a new training titled *Child Support Security Awareness*, the publication of an updated nondisclosure agreement (NDA), and the necessary actions, reporting method and record keeping requirements associated with the training and NDAs for all SSD staff and contract staff with access to child support information.

### II. Purpose

The purpose of this ADM is to advise SSDs of their responsibilities and of the required action associated with the release of the new training titled *Child Support Security Awareness*, and the publication of an updated NDA. The training is required for all SSD staff, including SCU counsel and administrative support staff, and all contract staff with access to child support information. The training is intended to ensure that all SSD staff and contract staff are made aware of their responsibilities regarding the use and disclosure requirements associated with safeguarding child support information, in accordance with federal and State law. This training will supplement any basic security awareness and/or cyber security training for information systems users that SSDs currently have in place.

### III. Background

The Federal Security Agreement and Internal Revenue Service Publication 1075, *Tax Information Security Guidelines For Federal, State and Local Agencies*, require that individuals with access to child support information, which includes child support confidential program information, Federal Parent Locator Service data, and federal tax information, receive annual training on the proper use and protection of such information, the potential sanctions for misuse, as well as recognizing and reporting incidents and potential indicators of insider threat. Additionally, individuals are required to sign a NDA, attesting to the understanding of the laws, regulations, policies, and rules governing use and disclosure of this information and to completion of the training.

### IV. Program Implications

SSDs are required to comply with the requirements outlined in the Federal Security Agreement and Publication 1075, which are identified in the training. SSDs should note that the requirements apply to all SSD staff with access to child support information, and is not limited to child support staff.

### V. Required Action

The *Child Support Security Awareness* training must be taken by all current SSD staff, including SCU counsel and administrative support staff, and contract staff with access to child support information. Effective immediately, all new staff must take this training before they are provided access to child support information. Effective January 1, 2016, all SSD and contract staff will be required to take this training each year before signing the annual NDA, the updated OTDA-3243 *Acknowledgment of Confidentiality of Child*

*Support Information, Including Internal Revenue Service Information* (Attachment 1), which now includes a statement that they have completed the training. The *Child Support Security Awareness* training is to be completed no later than March 1 of each calendar year.

Once the training has been completed, individuals must print the certificate of completion displayed at the end of the training module, and that certificate must be kept with the annual NDA they are required to sign, either with ink or electronic signature. Using the attached form (Attachment 2) the Child Support Enforcement Unit (CSEU) Coordinator or designee must certify annually to the Director of the Division of Child Support Enforcement (DCSE) by March 15 of each year that NDAs have been signed and training completed for all SSD and contract staff that has access to child support information.

## **VI. Systems Implications**

None

## **VII. Additional Information**

The training is available at **TrainingSpace.org**. Registration through STARS/HSLC is required to access the course. Copies of the signed NDA with attached certificate of completion must be retained by the CSEU Coordinator or designee for at least five (5) years, and must be available for review by the Office of Temporary and Disability Assistance, DCSE, upon request.

## **VIII. Effective Date**

This administrative directive is effective immediately.

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### **Issued By:**

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**Title:** Deputy Commissioner and Director  
**Division/Office:** New York State OTDA  
Division of Child Support Enforcement  
Center for Child Well-Being