

HUMAN SERVICES FINANCE OFFICERS RESOLUTION  
2001 Annual Conference

RESOLUTION NUMBER: 2001 - 01

RESOLUTION TITLE: EXPRESSION OF APPRECIATION TO THE PROGRAM COMMITTEE

WHEREAS; The responsibility of developing, coordinating, and delivering a program that challenges, informs, and stimulates the participants requires creativity, dedication, time, effort, and commitment; and

WHEREAS; Harry Roberts, Program Chairperson, and the entire Program Committee have performed in an outstanding manner in preparing the program for the 54<sup>th</sup> Annual Conference of the National Association of State Human Services Finance Officers, so as to meet or exceed the expectations for that committee,

NOW, THEREFORE, BE IT RESOLVED THAT:

THE NATIONAL ASSOCIATION OF STATE HUMAN SERVICES FINANCE OFFICERS expresses its sincere appreciation and heartfelt thanks to Harry Roberts and to each member of the Program Committee, for their effort in preparing an outstanding program for the 2001 HSFO 54<sup>th</sup> Annual Conference.

HUMAN SERVICES FINANCE OFFICERS RESOLUTION  
2001 Annual Conference

RESOLUTION NUMBER: 2001 - 02

RESOLUTION TITLE: EXPRESSION OF APPRECIATION TO THE ARRANGEMENTS  
COMMITTEE

WHEREAS; The responsibility for making arrangements for the 54<sup>th</sup> Annual Conference of the National Association of State Human Services Finance Officers requires dedication and cooperation; and

WHEREAS; The logistical task of preparation requires significant time and effort; and

WHEREAS; Vaughn Emett and Kent Roner, Arrangements Co-Chairpersons, and the entire Arrangements Committee have performed in an outstanding manner in hosting the 2001 Human Services Finance Officers Annual Conference,

NOW, THEREFORE, BE IT RESOLVED THAT:

THE NATIONAL ASSOCIATION OF STATE HUMAN SERVICES FINANCE OFFICERS expresses its sincere appreciation and heartfelt thanks to Vaughn Emett, Kent Roner, and to each member of the Arrangements Committee, for their hard work, hospitality, and accomplishments in hosting the 2001 HSFO 54<sup>th</sup> Annual Conference.

HUMAN SERVICES FINANCE OFFICERS RESOLUTION  
2001 Annual Conference

RESOLUTION NUMBER: 2001 - 03

RESOLUTION TITLE: FUNDING INFORMATION SYSTEMS

WHEREAS; Information systems have become an integral part of virtually all Human Services programs; and

WHEREAS; Many states are integrating systems development among and between not only the various Human Services programs but also increasingly between and among a wide variety of Governmentally operated programs; and

WHEREAS; Current Federal Regulations concerning approval of Human Services Information Systems are redundant, burdensome, and generally confusing to all parties; and

WHEREAS; Current strict federal cost allocation mandates result in financial disincentives to effective systems integration; and

WHEREAS; The currently confusing approval process and cost allocation requirements often lead to lengthy and inconsistent processing of State's requests for federal funding of information systems;

NOW, THEREFORE, BE IT RESOLVED THAT:

THE NATIONAL ASSOCIATION OF STATE HUMAN SERVICES FINANCE OFFICERS urges the DEPARTMENT OF HEALTH AND HUMAN SERVICES (DHHS) to reform the current process of review and approval of State's requests for funding of information systems development or improvements through revision of the current advanced planning document (APD) procedures by:

- 1) Increasing the monetary thresholds requiring submission of APDs for both regular and enhanced funding,
- 2) Eliminating the requirements that contracts, requests for proposals or services task orders have prior DHHS approval, and
- 3) Eliminating the DHHS approvals for routine maintenance and operational activities of state/local information systems, and

BE IT FURTHER RESOLVED THAT:

THE NATIONAL ASSOCIATION OF STATE HUMAN SERVICES FINANCE OFFICERS urges THE DEPARTMENT OF HEALTH AND HUMAN SERVICES to consider elimination of the current Advance Planning Document process by allowing States to incorporate it's overall information systems strategy into the various state plans for it's State and Federal Programs.

HUMAN SERVICES FINANCE OFFICERS RESOLUTION  
2001 Annual Conference

RESOLUTION NUMBER: 2001 - 04

RESOLUTION TITLE: CASH MANAGEMENT IMPROVEMENT ACT PROPOSED RULES

WHEREAS; The U.S. Department of Treasury published proposed rules concerning implementation of the Cash Management Improvement Act of 1990 at 31 CFR Part 205 on October 12, 2000; and

WHEREAS; The proposed rules require states to pay interest on any federal funds drawn but subsequently disallowed from the date of draw rather than the date of disallowance (Section 205.15 (b)) which penalizes state for acting in good faith when drawing funds and provides incentives for federal agencies to disallow any questioned costs since no interest is incurred by DHHS for disallowance's taken in error; and

WHEREAS; There is considerable passage of time from the publication of an audit through the federal review process before the issue of a disallowance is resolved; and

WHEREAS; When the resolution process is delayed by a federal agency, the state would be forced to pay interest while waiting for a federal action; and

WHEREAS; The proposed rules in Section 205.25(e) require the state to provide supplements to various federal block grants, specifically the Social Services Block Grant, the Child Care Development Fund and the Temporary Assistance to Needy Families Block Grant, to be drawn proportionately which is contradictory to the purpose of allowing state funding flexibility under the various block grants; and

WHEREAS; These proposed rules do not specify a uniform rate of interest to be applied to both state and federal agencies when the draw may be in question (e.g., Rates @ 45CFR Part 30 currently applies a rate of 14.75% against states for any disallowed funds but DHHS is only subject to the rate contained in current treasury-state agreement (typically less than 3%) for continuing awards, and 0% for disallowances taken in error;

NOW, THEREFORE, BE IT RESOLVED THAT:

THE NATIONAL ASSOCIATION OF STATE HUMAN SERVICES FINANCE OFFICERS opposes the final adoption of Sections 205.15(b) and 205.25(e) as proposed and urges OMB and the U.S. Treasury to revise the CMIA proposed rules @ 31CFR 205-15 (b) to define the start date of interest calculation as the date of resolution of any disallowance finding; and

BE IT FURTHER RESOLVED THAT:

THE NATIONAL ASSOCIATION OF STATE HUMAN SERVICES FINANCE OFFICERS supports the revision of Section 45 CFR 30.13 and 30.14 requiring DHHS to utilize the interest rate agreed to and contained in treasury-state agreements as defined in 31 CFR 205.6 when the debt arised from dispute between DHHS and a State on the allowability of claims.

HUMAN SERVICES FINANCE OFFICERS RESOLUTION  
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RESOLUTION NUMBER: 2001 - 05

RESOLUTION TITLE: HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT  
COMPLIANCE

WHEREAS; HIPAA requires adoption of national standards for electronic, administrative and financial health care transactions; and

WHEREAS; Such standards must be utilized by all health care providers, clearing houses, insurance plans, and government agencies who conduct health care transactions electronically; and

WHEREAS; States are required to implement all such standards within two years of the effective date of rules published by DHHS; and

WHEREAS; It is expected that at least 8 sets of rules will be required to provide guidance to states, health plans, clearing houses and providers only 2 of which have been published to date; and

WHEREAS; Compliance with HIPAA will require massive reengineering of not only human service electronic data systems but also many systems with which such systems share information including other governmental and private agencies; and

WHEREAS; Such reengineering will impact virtually every component of existing or planned Medicaid management information systems in human services programs including claims processing, clinical and financial data elements, security and data privacy, client and provider enrollment and eligibility, referrals, and actuarial program among others; and

WHEREAS; State agencies will require a reasonable period for implementation of HIPAA standards once they have been completely developed;

NOW, THEREFORE, BE IT RESOLVED THAT:

THE NATIONAL ASSOCIATION OF STATE HUMAN SERVICES FINANCE OFFICERS urges Congress to establish an effective date for state agency compliance for any portion of HIPAA to be two years from the effective date that the last and final DHHS regulation is adopted in relation to HIPAA.

HUMAN SERVICES FINANCE OFFICERS RESOLUTION  
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RESOLUTION NUMBER: 2001 - 06

RESOLUTION TITLE: FUNDING FOR SOCIAL SERVICES BLOCK GRANT

WHEREAS; Implementing legislation authorized a federal funding level for the Social Services Block Grant (SSBG) at \$2.38 billion; and

WHEREAS; The welfare reform legislation authorized states to transfer up to 10% of it's Temporary Assistance to Needy Families Block Grant (TANF) to the Social Services Block Grant ; and

WHEREAS; The Transportation Equity Act 21 has reduced the amount of a state's allowable transfer to 4.25% of that grant; and

WHEREAS; Recent federal appropriations have reduced SSBG funding substantially below the authorized funding level:

NOW, THEREFORE, BE IT RESOLVED THAT:

THE NATIONAL ASSOCIATION OF STATE HUMAN SERVICES FINANCE OFFICERS urges both the Congress and Bush Administration to fund the SSBG at its authorized level of \$2.38 billion per year and reauthorize State's transfer authority up to 10% of its TANF to the SSBG program.

HUMAN SERVICES FINANCE OFFICERS RESOLUTION  
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RESOLUTION NUMBER: 2001 - 07

RESOLUTION TITLE: TEMPORARY ASSISTANCE FOR NEEDY FAMILIES

WHEREAS; Congress passed Title IV-A of the Personal Responsibility and Work Opportunity Act with the full intention of giving the states great flexibility and multi-year funding; and

WHEREAS; The U.S. Department of Health and Human Services has restricted the programmatic and funding flexibility through regulations limiting the use of prior year grant funding for "assistance"; and

WHEREAS; The National Association of State Human Services Finance Officers disagrees with the interpretation of this section of the law as determined by DHHS,;

NOW, THEREFORE, BE IT RESOLVED THAT:

THE NATIONAL ASSOCIATION OF STATE HUMAN SERVICE FINANCE OFFICERS proposes that the use of prior year funding be unrestricted as to the provision of assistance or services and that Congress clearly support this flexibility during the reauthorization of the TANF program in FFY 2002.

HUMAN SERVICES FINANCE OFFICERS RESOLUTION  
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RESOLUTION NUMBER: 2001 - 08

RESOLUTION TITLE: CHILD CARE DEVELOPMENT FUND

WHEREAS; The provision of child care services is a significant support for low-income families and families seeking to leave cash assistance; and

WHEREAS; The financial structure of the CCDF is unnecessarily complex due to the different funding categories within the block grant; and

WHEREAS: Each of these components and their funding categories have different regulations related to the use, obligation and liquidation periods, causing administrative complexity that does not benefit the program goals; and

WHEREAS; Additional set asides such as Infant and Toddlers have further reduced flexibility to states and several other set asides are being discussed in Congress,

NOW, THEREFORE, BE IT RESOLVED THAT:

THE NATIONAL ASSOCIATION OF STATE HUMAN SERVICES FINANCE OFFICERS urges the components of the current block grant structure should be collapsed into federal funds and state funds, eliminating the mandatory, MOE, federal and state matching and discretionary categories.

BE IT FURTHER RESOLVED THAT:

THE NATIONAL ASSOCIATION OF STATE HUMAN SERVICES FINANCE OFFICERS urges further set-asides in the program should be limited to allow each state to determine what types of special child care services should be pursued based on the needs of the children in that state.

HUMAN SERVICES FINANCE OFFICERS RESOLUTION  
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RESOLUTION NUMBER: 2001 - 09

RESOLUTION TITLE: POLICY ANNOUNCEMENT ACYF-CB-PA-01-01, ADOPTION ASSISTANCE ELIGIBILITY

WHEREAS; The U.S. Department of Health and Human Services released a policy letter eliminating federal funding for the adoption of Title IV-E eligible children thru private adoption agencies; and

WHEREAS; Such a change in funding support causes a shift of responsibility for expenditures for privately placed Title IV-E eligible children, which constitutes an unfunded mandate for the states; and

WHEREAS; The states were not given the opportunity to comment on such a change,

NOW, THEREFORE, BE IT RESOLVED THAT:

THE NATIONAL ASSOCIATION OF STATE HUMAN SERVICES FINANCE OFFICERS urges the U.S. Department of Health and Human Services to rescind the policy announcement and reinstate the prior policy concerning IV-E adoptions, regardless of the placement process.

HUMAN SERVICES FINANCE OFFICERS RESOLUTION  
2001 Annual Conference

RESOLUTION NUMBER: 2001 - 10

RESOLUTION TITLE: POLICY ANNOUNCEMENT ACYF-CB-PA-01-02, CANDIDATES, ADMINISTRATIVE COSTS, UNLICENSED FOSTER FAMILY HOMES, FACILITIES OUTSIDE THE SCOPE OF FOSTER CARE

WHEREAS; The U.S. Department of Health and Human Services released a policy letter changing the funding parameters of allowability structure as it relates to the claiming of administrative costs for eligibility determination for foster care services under the IV-E program; and

WHEREAS; Such a change in funding support causes a shift of responsibility for administrative expenditures for children who may be candidates for IV-E foster care services and this change constitutes an unfunded mandate for the states; and

WHEREAS; The states were not given the opportunity to comment on such a change and Human Services Finance Officers believes the scope of the change was of such magnitude that issuance of a policy announcement was not the appropriate vehicle for such a change.

NOW, THEREFORE, BE IT RESOLVED THAT:

THE NATIONAL ASSOCIATION OF STATE HUMAN SERVICES FINANCE OFFICERS urges the U.S. Department of Health and Human Services to rescind the policy announcement and reinstate the prior policy concerning IV-E candidacy until such a time that the issue can be debated in the proper forum, either through the regulation issuance process or through legislation.