

2016 Annual Child Support Training Conference & Expo



PIECING IT ALL TOGETHER

May 3–5, 2016 » Garden Grove, California

CHILD SUPPORT DIRECTORS ASSOCIATION OF CALIFORNIA

2016 Annual Child Support Training Conference & Expo

COAP/COAP REUNIFICATION

2016 Annual Child Support Training Conference & Expo

Family Reunification

Charlene Vargas
*Child Support Specialist III
Ombuds & COAP Coordinator*

FAMILY REUNIFICATION

Family Reunification Compromise of Arrears Program (FR- COAP)

WHAT IS A FR-COAP

An agreement between the NCP and the LCSA to reduce PAA arrears owed in certain situations.

If approved, the “eligible arrears” will be compromised to zero.

- NCP shall not be approved for a FR-COAP more than 3 times in a 3 year period.
- There is no limit to the amount of applications a NCP can submit.

QUALIFICATIONS FOR APPLICATION



CAN YOU SEND
ME OUT AN
APPLICATION
FOR FR-COAP?

ELIGIBILITY CRITERIA

The NCP owes PAA arrears because the child received aid while not living with EITHER PARENT:

- Foster Care
- CalWorks
- KinGap

The child is not emancipated

The child lives with the NCP at least 50% of the time

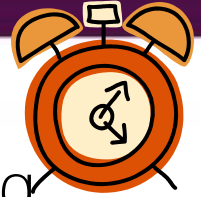
ELIGIBILITY CRITERIA CONT...

The NCP's current **Gross Income** is less than 300% or Net Income is less than 250% of the federal poverty level guidelines for that family size.

- Family Size
 - Includes NCP plus any of the NCP's natural or adopted children living in the home that he/she is legally obligated to support
- Income Level
 - Relevant income is the NCP's. (Do not count the spouses' income.)

Assets can NOT exceed \$10,000 (will exclude 1 primary residence and 1 vehicle).

APPLICATION REQUEST TIMELINES



The LCSA must mail an application when becoming aware that the NCP has been reunited with his/her child(ren) & an order for public assistance reimbursement has been established.

An application must be provided to the requestor:

- Immediately if the request is made in person
- Within 5 business days if the request is made over the phone

APPLICATION PACKAGE

The FR-COAP application package can be found on CA Central

- 1 application per case

APPLICATION RETURNED



REVIEW FOR CASE QUALIFICATIONS

The LCSA will need to review the application and CSE to determine if the case qualifies for “Temporary Suspension”.

FR-COAP APPLICATION	CSE
Application and I&E are complete	Do we have CMR?
All necessary supporting documents are attached	Is FR-COAP the most appropriate remedy?
	Does the order need to be modified?
	Check CSE for due diligence

CHECK THE FOLLOWING FOR DUE DILIGENCE:

- CSE case number
- Address & SSN of all participants
- **CP & NCP's relationship to the child(ren)**
- Time period the child(ren) were out of the home & was public assistance given
- Did the child(ren) live with the applicant prior to the placement (may not apply in foster care case)
- **Applicant's gross/net monthly income**
- All reported extraordinary expenses, such as daycare, medical and dental
- Justification for other uses of income as outlined in the reunification plan

AFTER REVIEW OF APPLICATION



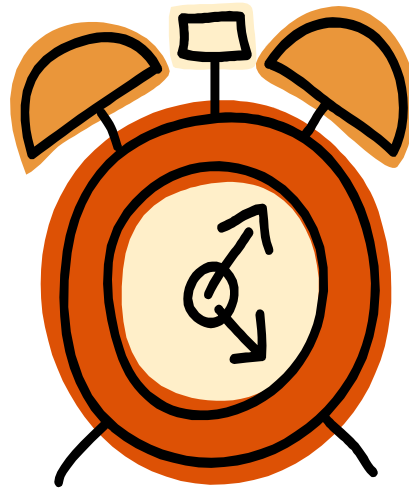
Within 10 business days of the receipt of the application, the LCSA must:

- Make the determination if the case qualifies for **“Temporary Suspension”**
- AND notify the NCP of the application status
 - Application is incomplete (DCSS 0031)
 - Case does not qualify (DCSS 0029-Denial)
 - Case qualifies for temporary suspension (DCSS 0030)

CASE QUALIFIES FOR TEMPORARY SUSPENSION



SUSPEND ENFORCEMENT ACTIONS



SUSPEND ENFORCEMENT ACTIONS

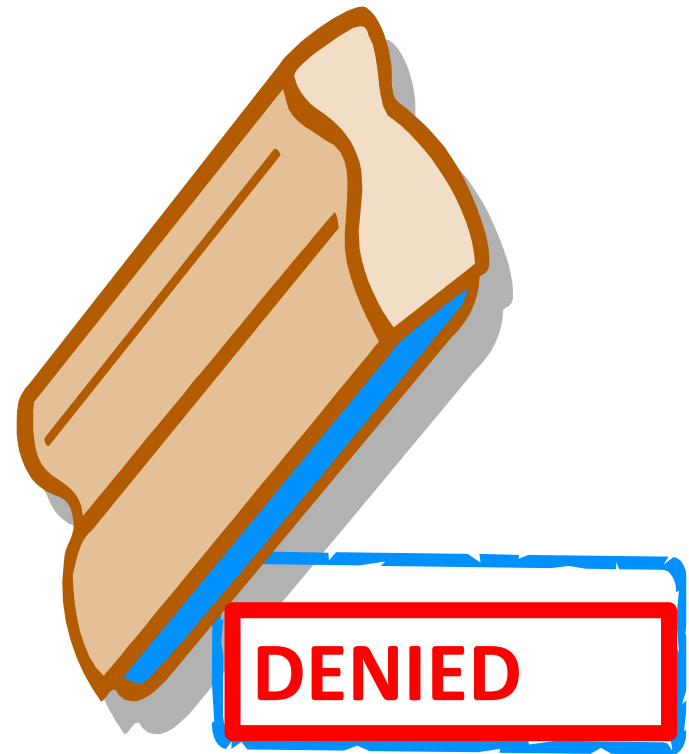
Worker shall review the “Case Balance Detail Screen” to figure out what type of suppression is needed.

ENTIRE BALANCE TO BE COMPROMISED ON A CASE	BALANCE STILL OWED AFTER COMPROMISE ON A CASE / or NCP HAS MULTIPLE CASES
<p>Suppress:</p> <ul style="list-style-type: none">• Everything on the “Participant” suppression level.• Balances on the “Account” suppression level	<p>Suppress:</p> <ul style="list-style-type: none">• “Account” suppression level on the Child(ren) balances

REQUEST AN AUDIT



REQUESTING FINAL APPROVAL



FORMAL vs. INFORMAL APPROVAL

FORMAL (we are stepping out!):



- PURSUANT TO A COURT ORDER:
 - The child has been adjudicated a dependent of the court AND Foster Care or KinGAP was expended
 - And the child is now residing with the NCP.

INFORMAL (Voluntary Placement):

- The child received public assistance while living with a guardian or relative caretaker and the child has been returned to the custody of and is residing with the NCP.

REQUEST FOR FINAL APPROVAL

FORMAL REQUEST APPROVAL (DESS)	INFORMAL REQUEST APPROVAL (DIRECTOR OR DESIGNEE)
<ul style="list-style-type: none">• Complete AND print form “DCSS 0308”	<ul style="list-style-type: none">• Complete AND print form “Informal Request for Approval”
<ul style="list-style-type: none">• Send the form to DCSS for approval or denial	<ul style="list-style-type: none">• Send the documentation to the Director or Designee
	<ul style="list-style-type: none">• In the email include:<ul style="list-style-type: none">• A brief statement why this case qualifies for FR-COAP• Is the child currently with the NCP• Time when the children were with the NCP prior to the timeframe being requested to compromise• Income & Asset Information

RESPONSE RECEIVED



Once the response is received from either the DESS (welfare department) or the DCSS liaison, the LCSA has 10 business days to:

- Notify the NCP that the FR-COAP has been denied (DCSS 0029)
- OR if the request is approved, the LCSA will:
 - Generate Stipulation and Order
 - Generate DCSS 0028 (Eligibility for Compromise)
 - The DCSS 0028 will be attached to the Stipulation!!

REMEMBER: If a modification of ongoing child support is needed, include this in the stipulation with the compromised amount.

SIGNATURES



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FILED STIPULATION & DCSS 0028



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E-Mail COAP

Once the Stipulation has been filed with the Courts, you will need to send an e-mail to COAP help at (COAPHelp@dcss.ca.gov) notifying the State that the documents have been uploaded into CSE.

Example:

FR COAP has been filed and uploaded into case 007000000-01.

QUESTIONS

QUESTIONS?

Thank you for your participation!

COAP vs. FR-COAP

Which COAP program needs 1 application per person?

Which COAP program needs 1 application per case?

Which COAP program can compromise the arrears to ZERO?

Which COAP application would you send if the CP was MOM/DAD?

If the child is emancipated, which COAP program would the applicant be denied automatically?

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COAP Coordinator
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Please be sure to complete the session evaluation.

The Basics of Auto COAP and MCOAP

Auto COAP and MCOAP

- Auto COAP: Automated Compromise of Arrears Program
- MCOAP: Manual Compromise of Arrears Program

Auto COAP

- Located on the LCSA Secure Website, in DCSS Data Retrieval
- The COAP security role is required to access COAP and COAP Practice.

The screenshot shows the DCSS Data Retrieval web page. On the left is a navigation menu with links: DCSS LCSA Website, DCSS Data Retrieval (highlighted with a red box), CBUD, CMT, COAP, COAP Practice, CPQ, CRTCS, DMV QT, IDB, IMP, LCSA SR, NICR, SOMS, Contact Us, and Log Out. The main content area has a blue header 'DCSS Data Retrieval' and a welcome message: 'Welcome, Stacey from Monterey, to the Department of Child Support Services Data Retrieval Web Page.' Below this is a section 'Please choose from following web applications:' followed by a table of applications. The 'COAP' link in the table is highlighted with a red box.

Application	Description	Version
CBUD	CSE 1257 Back Up Data	Version 1.0
CMT	Case Management Tool	Version 4.0
COAP	Compromise Of Arrears Program	COAP
COAP Practice	Compromise Of Arrears Program	Practice
CPQ	CSE Performance Queries	Version 1.0
CRTCS	Compliance Review Tool for Child Support	Version 3.1
DMV QT	DMV Query Tool	Version 1.0
IDB	Intercept Database	Version 2.0
IMP	Intercept Match Process	Version 1.0
LCSA SR	LCSA Service Request Tool	Version 1.0
NICR	National Interstate Case Reconciliation Project	Version 1.0
SOMS	Strategic Offender Management System	Version 1.0

[Back to Top of Page](#)

Auto COAP, page 2

- The Non-Custodial Parent (NCP) has only one open child support case, or can have more than one, but they all must be related to the same child/ren and same court case.
- Case Management Responsibility (CMR) for the case/s is with one Local Child Support Agency (LCSA).

Auto COAP, page 3

- There has to be a Permanently Assigned Arrears (PAA) balance of at least \$5,000.00
 - ❖ Owing Never Assigned Arrears (NAA) and Current Support DOES NOT DISQUALIFY an NCP from COAP.
- If the case will be a Payment Plan (vs. Lump Sum) ongoing current support will be paid first, if there is any.
- Then the NAA will be paid, if any.

Auto COAP, page 4

- Once all NAA have been paid off, payments will be paid to PAA.
- NCP can choose to pay off all NAA before the agreement is approved and executed.
- CP can choose to compromise their NAA, which must be done in a filed Stipulation and Order Waiving Unassigned Arrears before the COAP application can be approved and executed.

Auto COAP, page 5

- If there are any UDAA or Conditionally Assigned Arrears (CAA) accounts, that money will be paid after the State Repayment amount has been paid in full for Payment Plan cases.
- VERY IMPORTANT!!!!
 - ❖ If there are UDAA or CAA monies owed we MUST advise NCP during the approval process, **before** they sign the Agreement, that there will still be monies to pay after the State Repayment Amount has been satisfied!!!!

Exception for cases with TAA

- Temporarily Assigned Arrears (TAA) convert to CAA once a family leaves aid. For formerly assisted cases (FA), CAA must be satisfied prior to PAA, and collections for CAA are payable to the CP UNLESS the collection results from an IRS tax intercept.
- Should conversion occur during the term of a COAP payment plan, the compromise would be disrupted because the collections would be payable to the CP rather than the government. Due to the risk of conversion, cases with TAA must be paid in a single lump sum.

Auto COAP, page 7

- There are criteria the NCP must meet in order to qualify for the program. They are on page 6 of the Auto COAP application on the Secure Website:

Auto COAP, page 8

Stacey [REDACTED]

Page 1

Page 2

Page 3

Page 4

Page 5

Page 6

Page 7

Page 8

Page 9

Notes

Payment History

ELIGIBILITY CHECKLIST

- Minimum amount of permanently assigned child support arrears owed to the government of at least \$501. (Note: Applications with arrears balances between \$501 and \$4,999.99 must be processed manually.)
- No previous application to participate in COAP within one year prior to the date of application
- No rescission of a previous COAP agreement within two years prior to the date of application
- No conviction or contempt finding for failure to pay child support within six months prior to the date of application
- No intentional failure to pay child support in anticipation of COAP
- Only one child support case in the California child support program. (Note: Effective October 2008, both applications with single and multiple cases are eligible for an offer in compromise. Multiple cases must be processed manually.)
- The California child support case is not a two-state responding interstate case. (Note: California initiated interstate cases UIFSA [Uniform Interstate Family Support Act] are eligible for an offer in compromise but must be paid in a lump sum.)
- The NCP does not have the ability to pay off all arrears owed, including interest, within three years from the date of application
- Ability to pay current support, arrears owed to family that are to be distributed prior to the arrears owed to the government and the Arrears Repayment Amount as provided in the Compromise Agreement within a three-year period from date of the Agreement from any source (e.g. gift, loan, income)
- No concealment of any income, assets, or any reasonably anticipated income or assets, and no intentional withholding or falsifying of financial information

Auto COAP, page 9

- If the NCP does not meet one of the criteria, he/she will not qualify for COAP, and will be denied because of that reason.

Auto COAP, page 10

- It is important to review NCP's income, expenses, and current payments.
 - ❖ If he/she has the ability to pay their balance/s off in 3 years, *THEY DO NOT QUALIFY*
 - ❖ *It is important to review the case/s with a critical eye and be able to come to the correct conclusions based **on the evidence in CSE, NCP's application, and research of NCP's financial situation.***
- The intention of the program is to come to a situation that is
 - #1: Beneficial to the State of California.

Auto COAP, page 11

- NCP must provide all required and requested documentation to continue with the COAP process.
- If NCP does not, the application can be denied because of failure to provide the information necessary to complete the review.
 - ❖ The Denial letter must be sent to the NCP, which will explain why their application was denied.

Auto COAP, page 12

- If an application is denied, the NCP will not be eligible to re-apply for COAP for one year from the date of their signed application.

**Exceptions: If the NCP responds within a *reasonable* amount of time to the Denial letter and provides the requested information, the Denial status in the automated system can be UN-denied and the review can continue.

Auto COAP, page 13

- *REASONABLE* amount of time: Not more than a month after the date of the Denial letter.
 - ❖ Example of acceptable reasons to allow the process to continue:
 - NCP was out of town when they received the letter
 - NCP was hospitalized or ill or a family member was ill

Auto COAP, page 14

- LCSAs have 60 days to enter into a COAP agreement with an NCP from the date the COAP application had its final approval.
 - ❖ The Compromise and repayment amounts might differ slightly if payments were received since the final approval.

Manual COAP

MANUAL COAP

a.k.a.

MCOAP

MCOAP, page 1

- MCOAP is entered into the Manual COAP Multiple Cases Excel Workbook, located on Child Support Central
- It is used when the NCP has multiple cases OR a minimum governmental debt of between \$501.00 and \$4,999.99

COAP Help

[View All Site Content](#)

Documents

- Agendas and Attachments
- COAP Help
- COAP Reports
- COAP Forms
- Other Materials

Contacts

- DCSS COAP Contacts
- COAP LCSA Contact List
- COAP LCSA Financial Contact List

Discussions

- Team Discussion

Change Password

Security Question

Actions							View: Active Documents
Type	Name	Document Description	Sub Category	Anticipated Release	Reference #	Modified	Modified By
	01 COAP Contacts					7/8/2015 2:23 PM	central:91michellesantiago
	02 COAP Training					7/8/2015 2:23 PM	central:91michellesantiago
	03 Exceptional Reduction Requests					7/8/2015 2:23 PM	central:91michellesantiago
	04 Quick Reference Guides					7/8/2015 2:23 PM	central:91michellesantiago
	COAP Policy and Procedure Manual Oct 2008 final					7/8/2015 2:23 PM	central:91michellesantiago
	COAP Templates for DCSS 0196 Free Form	COAP Free Form for use with DCSS 0196.				5/26/2010 8:50 AM	central:91huongha
	FAQ June 2013	Frequently asked questions received by COAP Help				11/19/2013 11:03 AM	central:91patriciaangelique
	LCSA 2nd Level Review Checklist	A checklist to use when reviewing prior to approval.				7/8/2015 2:03 PM	central:91michellesantiago
	Manual COAP Multiple Cases Workbook	MCOAP workbook for multiple cases or with governmental debt of \$501 - \$4,999.00. Version 5.5				8/13/2015 4:34 PM	central:91michellesantiago

MCOAP, page 3

- The application is the same one used for Auto COAP
- The Eligibility Criteria are the same
- The Manual Workbook is completed outside of the Secure Website, and saved locally
- How do you get an MCOAP application number?
 - ❖ Request it from State COAP
 - ❖ Vs. Auto COAP: The number is automatically created when entering a new application

- If the NCP has cases with multiple LCSAs, which LCSA does the review?
- [The Hierarchy:](#)
 1. The LCSA case that owes current support
 2. The LCSA with the highest governmental arrears balance
 3. The LCSA that would like to volunteer to complete the review and confirms that the other LCSAs involved are in agreement

MCOAP, page 5

- If the MCOAP application is approved, the LCSA with CMR will submit the appropriate agreement/s with all attachments to each LCSA involved to file with their Court of Jurisdiction on each case.
- Each LCSA will be responsible for updating their account balances in CSE to the State Repayment Amount for their case once the Agreement has been filed by their Court.

COAP Payment Options

Automated COAP vs.

- PAA balance of > \$5,000
- Single court case, but multiple CPs
- CMR is with 1 county
- Payment plan of up to 36 months, OR
- 1 Single Lump sum payment

Manual COAP

- PAA balance of between \$501 and \$4,999.99
- Multiple cases with children of multiple CPs
- CMR is with multiple LCSAs
- 1 Single Lump sum payment

Auto and MCOAP: Rescinding the Agreement

- What happens if NCP stops paying?
- The filed Agreement will either be fully Rescinded or Partially Rescinded.
- With either, NCP will not be eligible to reapply for COAP for 2 years from the date of rescission.

Full Rescission

Full Rescission circumstances:

- It is determined that NCP concealed, withheld or falsified information regarding their application.
- NCP fails to comply with the required payment amount in the first 6 months of the signed Agreement.
- NCP fails to comply with a current support payment at any time during the term of the Agreement.

Full Rescission, page 2

- All arrears and interest that were compromised under the Agreement are re-instated.

Partial Rescission

Partial Rescission circumstance:

- NCP fails to comply with the terms of the Agreement over a consecutive 3 month period, and failed to contact the LCSA with an explanation that would justify modifying either the child support order or the Agreement.
- The Arrears balance at the point NCP stopped paying will be re-instated.

Partial Rescission, page 2

- The initial payment and any other payments that **were made will remain credited to the NCP's** accounts and will not be returned to the NCP.
- Any compromise adjustments credited based on payments received up to the point of partial rescission will remain compromised.

Auto and MCOAP

- If NCP fails to make their complete payments in the first 6 months of a payment plan, the whole agreement will be rescinded.
- It is the responsibility of the designated COAP person in your LCSA to monitor payments on a monthly basis, and add them to the COAP Payment Tracker **PRIOR to the second Tuesday of each month.**

Any Questions???

DCSS COAP

Contact Info:

916-464-2877

COAPHelp@dcss.ca.gov

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COAP: A Case for Compromise

Michelle Santiago, SSMI
State DCSS

Child Support Debt Compromise: How Did We Get Here?

The Collectibility Study

- Legislatively mandated due to dramatic growth in child support arrears during the 1990s

Source: Examining Child Support Arrears in California: The Collectibility Study (Urban Institute, 2003)

Child Support Debt Compromise: How Did We Get Here?

Published Findings

- Arrears debt was highly concentrated among a small percentage of debtors
- Most owed \$20,000 or more
- 70% was owed for repayment of public assistance
- More than half was owed by low income Noncustodial Parents (NCPs)
- Only one-quarter of the debt was collectable

Source: Examining Child Support Arrears in California: The Collectibility Study (Urban Institute, 2003)

Child Support Debt Compromise: How Did We Get Here?

Recommendations

- The study offered 18 recommendations to
 - Reduce existing arrears debt
 - Limit the rate of future accrual
- Arrears compromise was recommended as one debt management strategy

Source: Examining Child Support Arrears in California: The Collectibility Study (Urban Institute, 2003)

Child Support Debt Compromise: How Did We Get Here?

Legislative Action

- The State Legislature authorized COAP on a limited term basis in 2003 and made the program permanent in 2008

- Statutory authority for COAP
 - Family Code 17560 (COAP)
 - Family Code 17415 (Family Reunification COAP)

Federal Support for Debt Compromise

The Department of Health and Human Services (HHS)

- Encourages the compromise of government-owned child support arrears
- Reports that 70% of unpaid child support debt is owed by parents with little or no reported earnings

Source: NPRM November 17, 2014 Flexibility, Efficiency, and Modernization in Child Support Enforcement Programs; Proposed Rule

Federal Support for Debt Compromise

HHS emphasizes that the unnecessary accrual of arrears

- Hinders payment of regular support payments
- Leads to uncollectable debt
- Limits work opportunities for NCPs
- Interferes with parent-child relationships

Source: NPRM November 17, 2014 Flexibility, Efficiency, and Modernization in Child Support Enforcement Programs; Proposed Rule

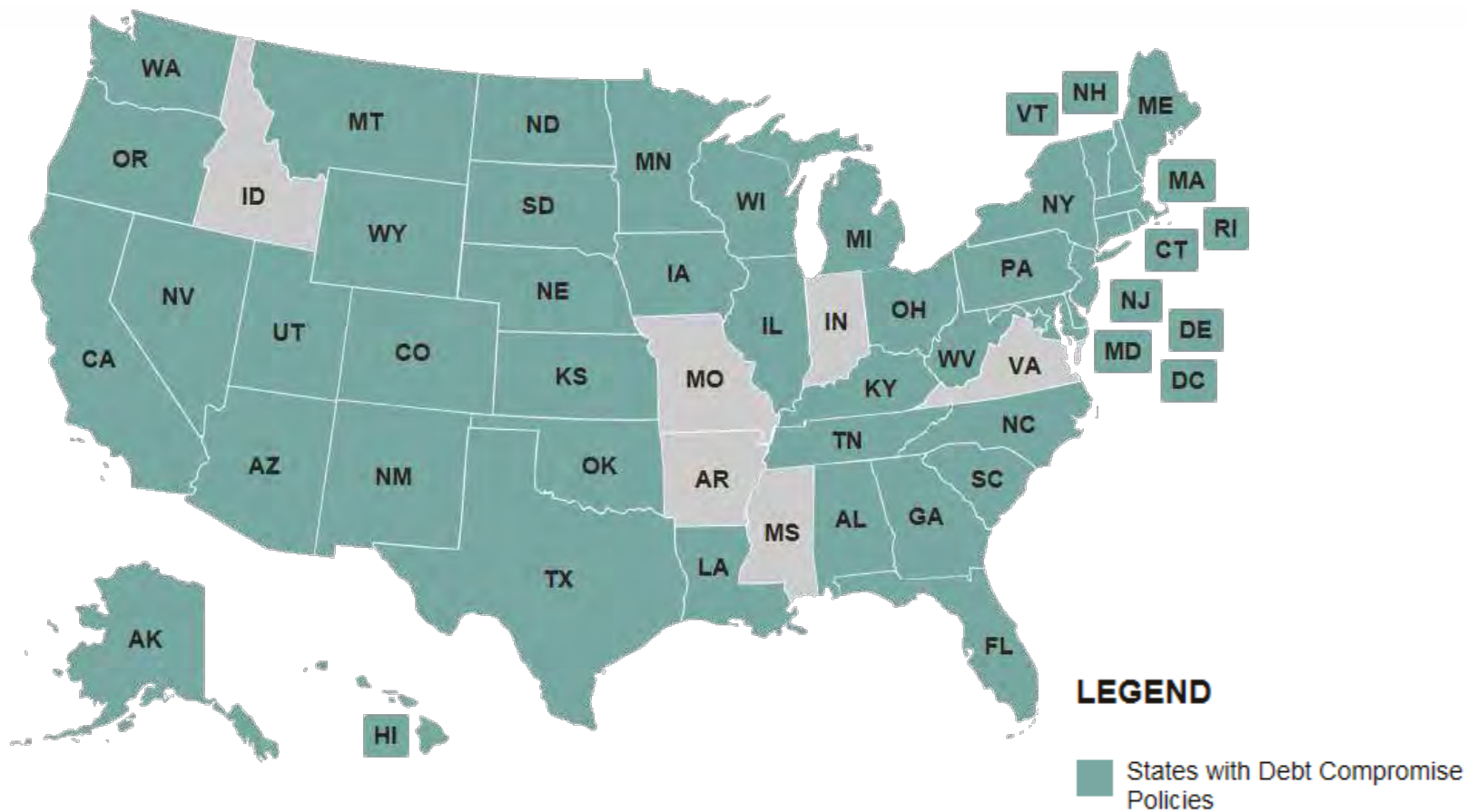
Federal Support for Debt Compromise

HHS supports policies that

- Provide families with effective child support enforcement services
- Promote state flexibility
- Ensure efficient use of state and federal resources by focusing efforts on productive cases

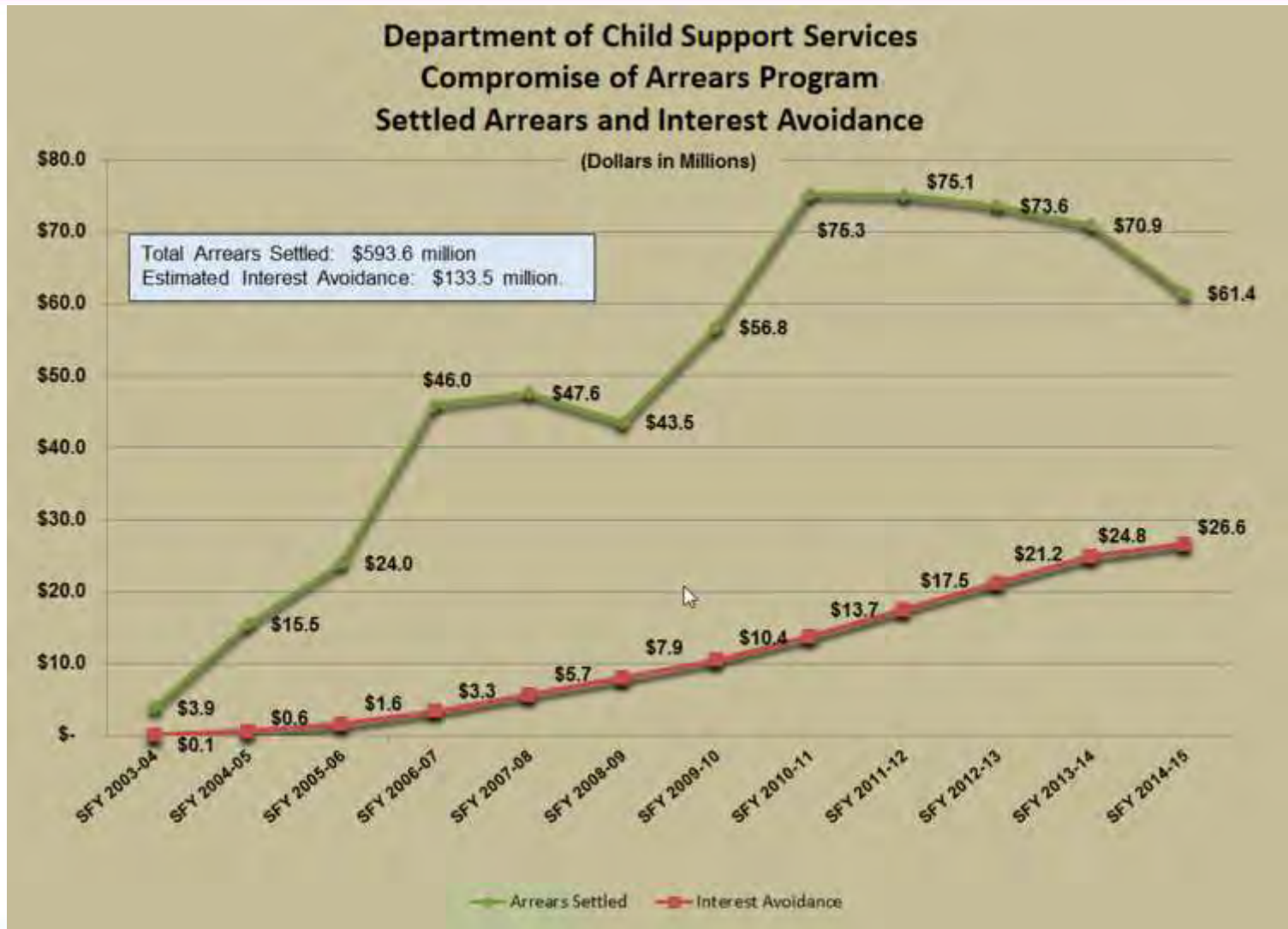
Source: NPRM November 17, 2014 Flexibility, Efficiency, and Modernization in Child Support Enforcement Programs; Proposed Rule

States with Debt Compromise Policies For Child Support

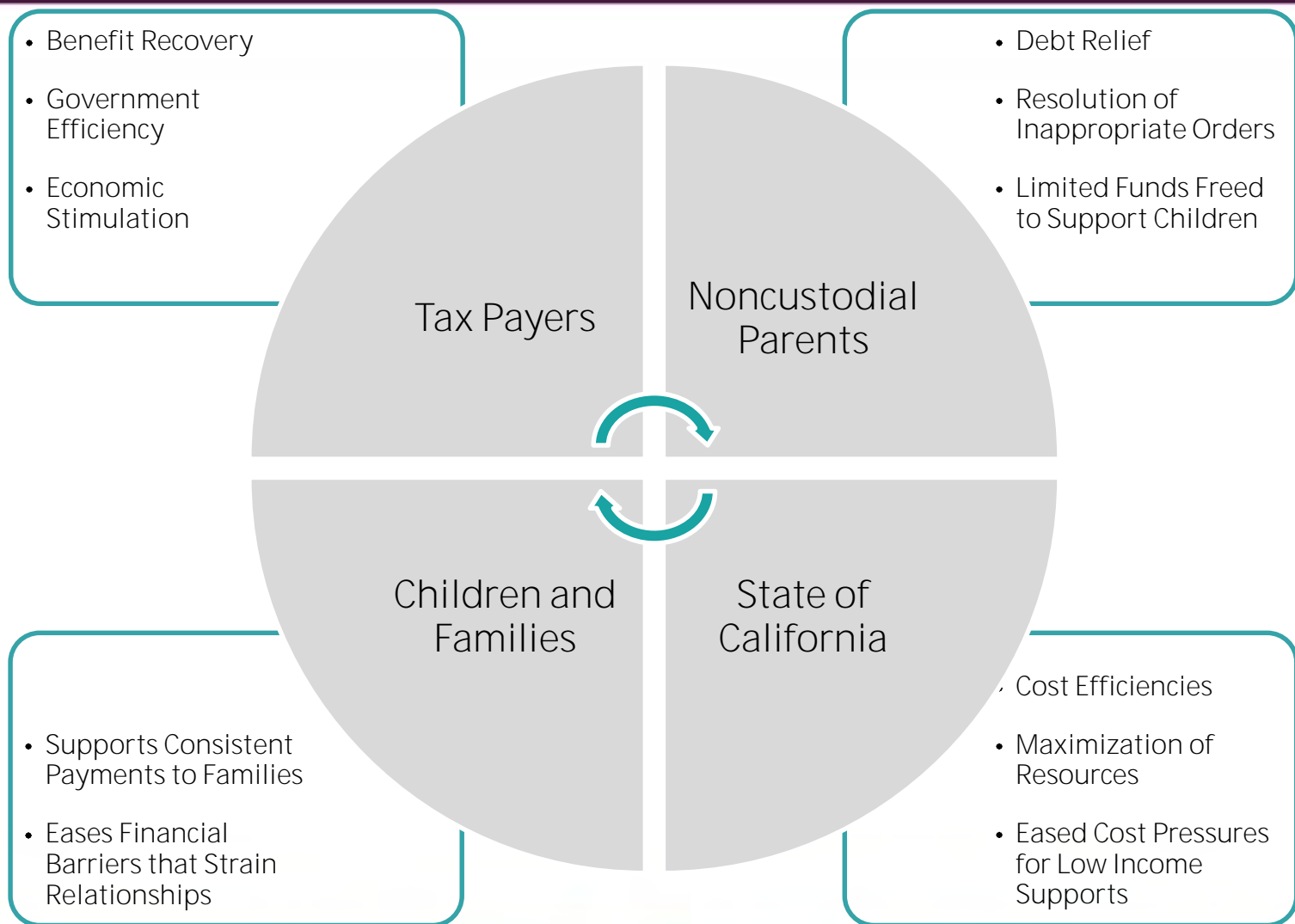


Source: Office of Child Support Enforcement
<http://www.acf.hhs.gov/programs/css/resource/state-child-support-agencies-with-debt-compromise-policies>

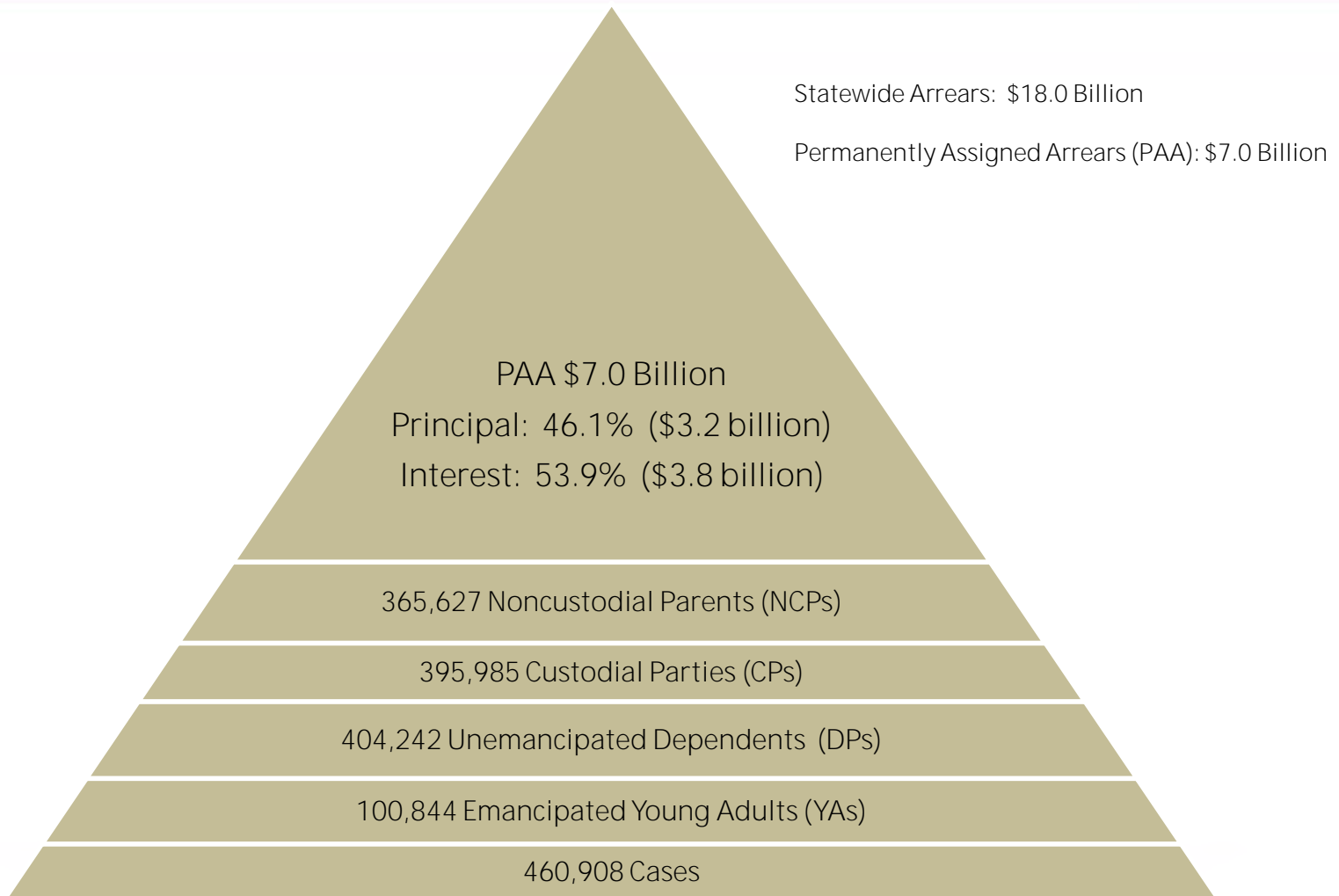
COAP Accomplishments



Who Benefits from Compromise?

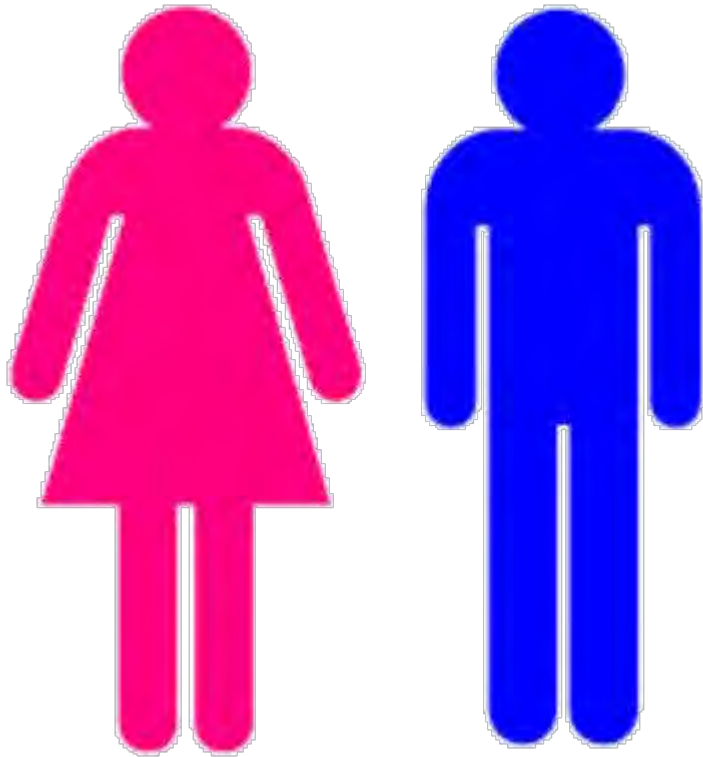


The Mountain of Child Support Debt



Source: CSE Queries Q-1179, Q1180 and Q-1181, October 2015

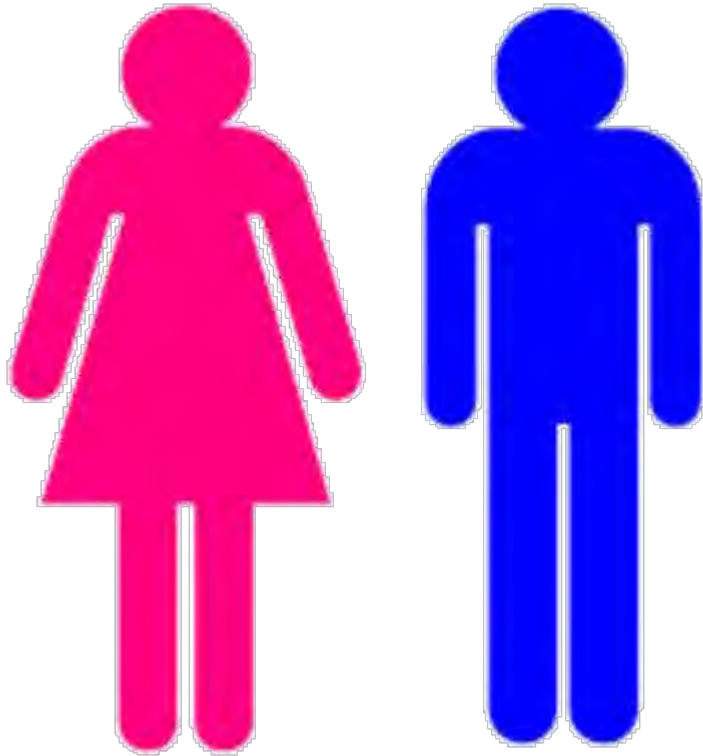
A Case for Compromise - NCPs



- 365,627 NCPs owe \$7.0 billion in PAA debt
 - \$19,145 avg. per NCP
- 27.9% have at least one unemancipated Dependent (DP)
- 51.7% have at least one emancipated Young Adult (YA)
- 31.8 % have a record of incarceration in CSE
- 16.8% receive some type of government benefits

Source: CSE Queries Q-1179, Q1180 and Q-1181, October 2015

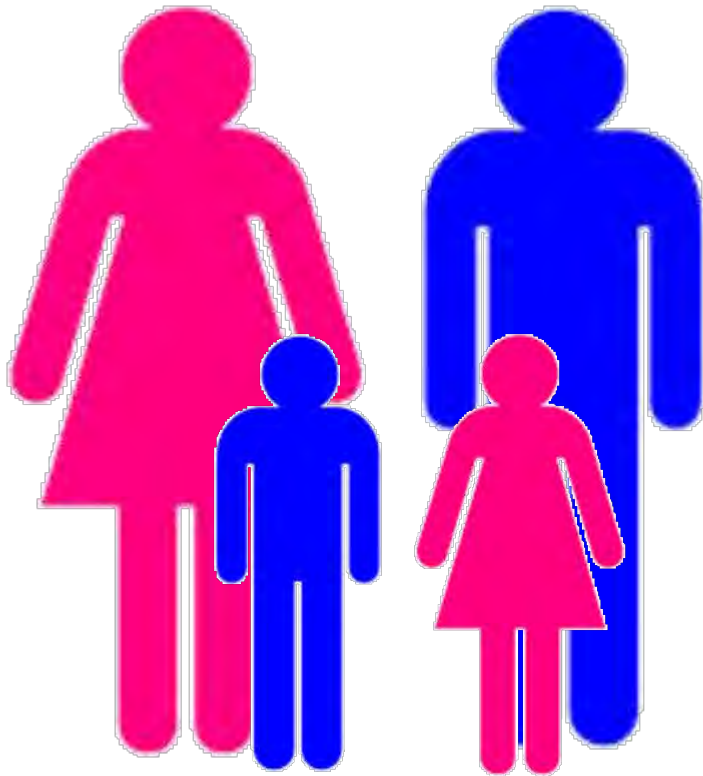
A Case for Compromise – CPs



- 395,985 CPs
 - 62.5% have at least one unemancipated DP
 - 12.1% have at least one emancipated YA
 - 31.4% are currently assisted

Source: CSE Queries Q-1179, Q1180 and Q-1181, October 2015

A Case for Compromise - Dependents



- 404,242 unemancipated DPs
 - 75.0% emancipate 2021 or later
 - 51.5% are currently assisted
- 100,844 emancipated YAs
 - Those within 4 years post-emancipation
 - Continued financial dependency is likely while pursuing higher education or entry into the workforce

Source: CSE Queries Q-1179, Q1180 and Q-1181, October 2015

A Case for Compromise – Resources



- 460,908 cases carry PAA
 - 35.4% of the statewide caseload
 - \$15,282 average per case
 - Only 13.3% had any collection in SFY 2014-15
 - Half carry at least one other type of arrears debt
 - Nearly 36% include a current support obligation (avg. mo. \$321)

Source: CSE Queries Q-1179, Q1180 and Q-1181, October 2015

A Case for Compromise – Resources

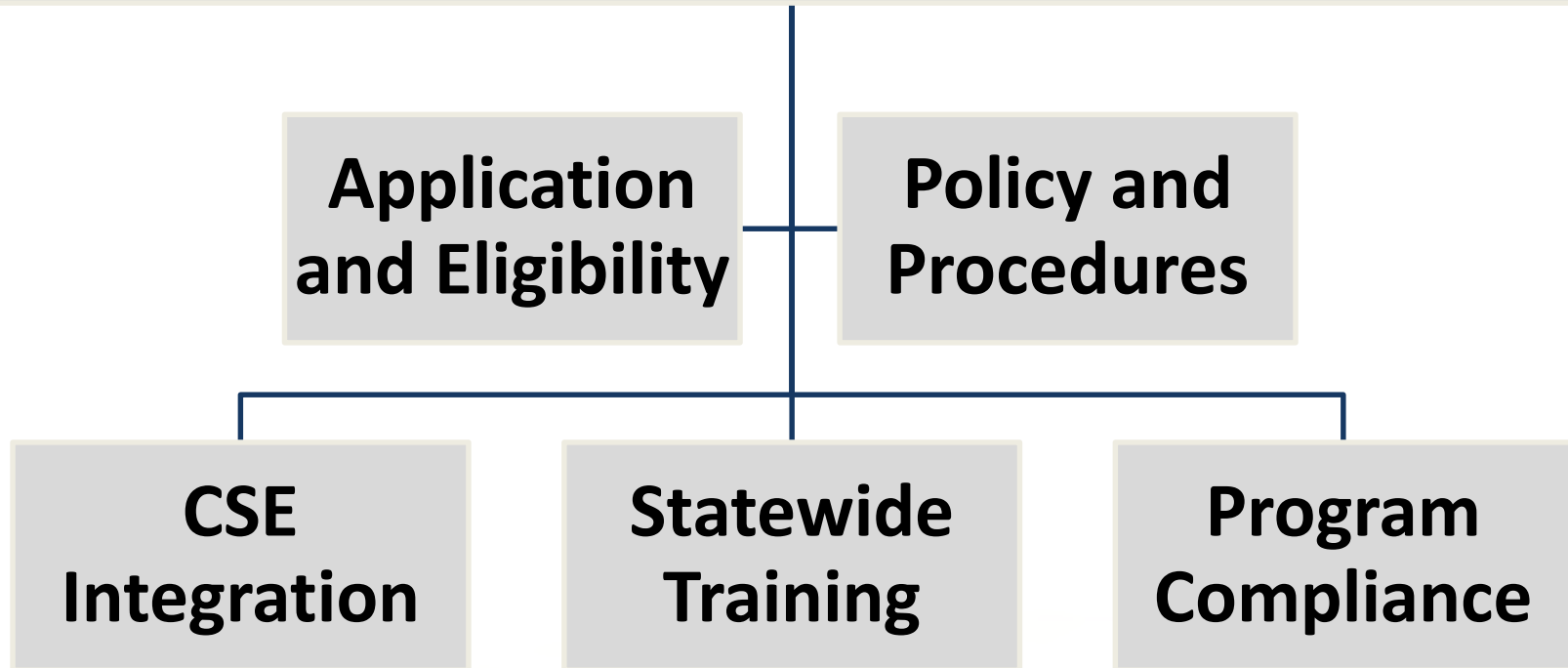


- California manages \$7.0 billion in PAA debt
 - 38.9% of the total statewide arrears
 - 53.9% is interest (\$3.8 billion)
 - 66.3% predates CSE (8+ years)

Source: CSE Queries Q-1179, Q1180 and Q-1181, October 2015

Child Support Debt Compromise: Where Do We Go From Here?

DCSS is working to improve, simplify and expand COAP to maximize the collection of arrears and decrease the burden of unpaid child support



Application and Eligibility

DCSS will automate and streamline the application and eligibility process for COAP

- Development of an online application will
 - Improve customer service
 - Leverage existing resources
 - Reduce workload (for 5,000 to 6,000 applications annually)

- Refining and streamlining eligibility requirements will
 - Promote statewide uniformity
 - **Ensure agreements are in the “Best Interest of the State”** (mandated by family code)

Policy and Procedures

DCSS will update and strengthen COAP policies and procedures

- Updating Policies will
 - Align COAP with HHS family centered mission and goals
 - Meet current program needs
 - Streamline and expand participation
 - Strengthen program oversight

- Strengthening COAP Procedures will
 - Enhance collaboration among program partners
 - Encourage best practices for improved customer service
 - Strengthen training and statewide uniformity

CSE Integration

DCSS will integrate COAP functionality into CSE

- Integrating COAP into CSE will enable DCSS to
 - Conform with federal single system of record requirement
 - Leverage existing information and resources
 - Expand program and payment options
 - Reduce manual workload
 - Enhance program integrity and uniformity
 - Enforce program compliance

Statewide Training

DCSS will develop and deliver comprehensive training to local agency partners

- Comprehensive online training will
 - Promote statewide uniformity and staff development
 - Enhance customer service
 - Support program compliance
 - Improve collaboration among stakeholders

Child Support Debt Compromise: Give Us Your Input!

DCSS is working in collaboration with Local Agencies to improve COAP. We want to hear from you! Please share your ideas and questions with us.



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Michelle Santiago, SSMI
COAP and Passport Denial Program
CA Dept. of Child Support Services
Michelle.santiago@dcss.ca.gov
Direct: (916) 464-5098
COAP Help: (916) 464-2877

Thank you and have a wonderful day!

Please be sure to complete the session evaluation.

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PIECING IT ALL TOGETHER

www.csdaca.org

CHILD SUPPORT DIRECTORS ASSOCIATION OF CALIFORNIA