

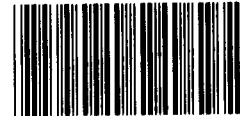
GAO

Briefing Report to Congressional  
Requesters

February 1992

# INTERSTATE CHILD SUPPORT

## Wage Withholding Not Fulfilling Expectations



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**Human Resources Division**

B-243891

February 25, 1992

The Honorable Marge Roukema  
House of RepresentativesThe Honorable Bill Bradley  
United States SenateThe Honorable Barbara Kennelly  
House of Representatives

On behalf of the U.S. Commission on Interstate Child Support, you asked us to examine how well the legislative requirement for wage withholding of child support payments in interstate cases is working. This requirement was a part of 1984 amendments to title IV-D of the Social Security Act.<sup>1</sup> Specifically, you asked us to

- examine procedures used in interstate wage withholding,
- gauge the uniformity of these procedures among states,
- estimate the time taken to serve a wage withholding order on an employer, and
- identify the factors contributing to processing time.

Overseen and partially funded by the federal Department of Health and Human Services (HHS), the nation's Child Support Enforcement programs are administered by states through state and local child support offices, known as IV-D offices. To obtain the information you requested, we (1) identified the 399 local IV-D child support offices that serve counties with more than 100,000 population, (2) selected a random sample of 34 percent (136) of those offices, and (3) conducted a telephone survey of the sampled IV-D office directors or their designees. In order to design the study, we visited three IV-D offices, examining case files and interviewing the directors and caseworkers. We carried out the study between June and September 1991, in accordance with generally accepted government auditing standards. (See sec. 1.)

On November 8, 1991, and February 7, 1992, we briefed your staff and Commission members on the results of our review. As requested, we are providing this briefing report to summarize our work.

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<sup>1</sup>P.L. 98-378.

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## Background

The 1984 amendments required substantial reforms to the federal-state Child Support Enforcement programs. Among eight enforcement remedies considered particularly promising, wage withholding was considered the one that held great hope for more efficient enforcement of support orders for millions of children.

The law requires states to withhold support payments from the wages of any noncustodial parents who become delinquent the equivalent of 1 month or more in their court-ordered child support payments. When that trigger occurs, the states must notify the noncustodial parents and their employers, in advance, that withholding must begin. The noncustodial parents may contest the withholding, but only on the basis of mistakes of fact as to their identity or the amount of current or overdue support.

The law requires that wage withholding be used in interstate as well as in-state cases. An interstate wage withholding case includes those in which the custodial parent and children live in a different state from the one in which the noncustodial parent lives or works. Enforcement in interstate cases is widely recognized to be more complex and difficult than in in-state cases because it involves multiple offices and courts in two or more states with laws and procedures that are frequently inconsistent.

With a view towards expediting interstate wage withholding, federal law and regulations require that offices receiving requests for wage withholding from another state's office handle such requests "as their own"—in the same manner as in-state requests, including not requiring amendment of the sending jurisdiction's court order or other court action before implementing the withholding request.

Federal regulations further require that each state establish a central registry—a clearinghouse for all incoming interstate cases. The local office in the initiating state must send its interstate request to the central registry in the responding state. The central registry is required to review case documentation, such as noncustodial parent address and employer information, for completeness. Then it must transmit the request for action to the appropriate local office in its own state.

States and local IV-D offices have traditionally relied on the Uniform Reciprocal Enforcement of Support Act (URESA) to initiate and respond to interstate case requests, whether they were seeking to establish paternity or a child support order, locate a noncustodial parent, or enforce an existing order. URESA is model legislation—not a federal law—developed in

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1950 and revised three times since then. States are free to enact, and have enacted, different pieces from, or the whole of, any of the four versions. This has led to considerable variation in the way courts in different jurisdictions handle interstate requests.

By providing, in the 1984 amendments, that no further court action nor amendment of the initiating jurisdiction's court order (for child support, custody, or visitation) may be required, the Congress sought a timely, expedited procedure for interstate wage withholding. It expected the procedure would avoid the complex and cumbersome URESA procedures.

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## Results in Brief

Interstate wage withholding is not working in the manner the Congress and HHS expected, and is not working well. With more than six different procedures in use across the country, uniformity is lacking. Moreover, heavy reliance on nonuniform URESA procedures continues, in part because offices believe they need URESA to enforce wage withholding when it is coupled with requests for other congressionally mandated enforcement remedies. The lack of uniformity produces confusion that may slow timely serving of withholding orders on employers. It can take a few weeks to over a year. But local offices ranked three other factors as more important in contributing to lack of timeliness, and we identified four additional factors.

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## More Than Six Procedures Used

You inquired about four procedures, and we learned of others during our study. The four you inquired about include (1) an expedited procedure required by the 1984 amendments (i.e., handle as their own in-state case); (2) the procedure under the Model Interstate Income Withholding Act; (3) URESA Petition<sup>2</sup> and (4) URESA Registration.<sup>3</sup> Instead of widespread use of an expedited, handle-as-their-own withholding procedure, we found the most prevalent of the four procedures to be continued reliance on URESA petitions and registrations. Few offices report their states use a procedure under the Model Interstate Income Withholding Act. About a dozen offices report using a variety of procedures other than these four.

We learned of two additional procedures that large majorities of offices use on some cases and that they find successful. In one, they send their wage withholding request directly to out-of-state employers, bypassing the

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<sup>2</sup>In a URESA petition, the responding office petitions its court to establish and enforce a brand new child support order, despite an existing order from the initiating jurisdiction's court.

<sup>3</sup>In a URESA registration, the responding office legally certifies (i.e., registers) the initiating court's child support order with the responding court. No new support order is established.

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responding state's central registry and local IV-D office. The employer transmits the withheld money directly back to the initiating office. In the other procedure, the initiating office locates a branch of the out-of-state employer—a registered agent—operating in its own state. In this instance, the initiating office sends the request to the registered agent who transmits it to the branch in the state where the noncustodial parent is employed. (See sec. 2.)

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**Procedures Lack Uniformity;  
Congressional Mandates  
Misunderstood**

With more than six different procedures in use for interstate wage withholding, there is not uniformity. Moreover, as the most prevalent procedures continue to be URESA procedures, non-uniformity is compounded, owing to the differing pieces and versions of URESA model legislation that states have enacted through the years.

Offices misunderstand that wage withholding should proceed, irrespective of other enforcement remedies being pursued. They report sending and receiving few “pure”<sup>4</sup> expedited withholding requests. Instead, offices couple their requests for wage withholding with requests for more general enforcement in 85 percent of the cases. When this occurs, they believe URESA procedures must be followed. This delays withholding. They couple their requests in order to comply with other congressionally mandated enforcement remedies in addition to wage withholding. These remedies include medical support enforcement;<sup>5</sup> review and modification of child support award levels; interception of tax refunds due to noncustodial parents; and collection of past due support to repay states' welfare expenditures on custodial parents and children. (See sec. 3.)

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**Withholding Not Timely**

How long does it take to serve a wage withholding order on an employer? The offices we surveyed report that when they respond to a request from an office in another state, it takes them anywhere from a median time of 6 weeks to a median 16 weeks to serve an order. But when offices in other states respond to the surveyed offices' requests, respondents say it takes anywhere from a median time of 12 weeks to a median of 26 weeks. Estimates range from 2 to 100 weeks across both sending and receiving offices. The differences in median estimates depend on the completeness and accuracy of information on the noncustodial parents and their

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<sup>4</sup>A pure wage withholding request is one in which that enforcement remedy is the only one requested of the receiving office.

<sup>5</sup>Medical support enforcement means obtaining health insurance coverage for children from their noncustodial parents.

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employers. They also depend on whether the offices sent or received a pure wage withholding request or one coupled with a request for general enforcement. The estimates do not include all of the activities requisite to getting money into the hands of custodial parents and their children. (See sec. 4.)

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### Multiple Factors Contribute to Delays

Offices were asked to rank the top three factors that might contribute to the time it takes to obtain wage withholding. In order of importance they ranked (1) missing or inaccurate information on the noncustodial parent or employer, (2) parents who have left the employer before the withholding order is served, and (3) the size of the caseworkers' caseloads.

We found four other factors that exacerbate the delays:

- a lack of computer automation in some offices;
- states' central registries that do not screen and verify as much information as they might;
- inadequate familiarity with appropriate interstate withholding procedures, especially among attorneys and judges; and
- courts that are slow to hold hearings. (See sec. 5.)

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### Respondents Made Suggestions for Improvements

Respondents made several suggestions for improvements to interstate wage withholding. The most prevalent suggestion is that the Congress statutorily authorize initiating states to send withholding orders directly to out-of-state employers. (See sec. 6.)

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As agreed with your offices, we did not request written agency comments. We did, however, meet with HHS officials to discuss this report, and we considered their comments in preparing it. As arranged with your offices, unless you publicly announce its contents earlier, we plan no further distribution of this report for 5 days from its issue date. At that time, we will send copies to the Secretary of HHS and other interested parties.

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Should you wish to discuss its contents, please call me on (202) 512-7215.  
Other major contributors to this briefing report are listed in appendix III.

*Joseph F. Delfico*

Joseph F. Delfico  
Director, Income Security Issues





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**Abbreviations**

AFDC	Aid to Families With Dependent Children
CATI	Computer-Assisted Telephone Interview
CP	custodial parent
CPS	Current Population Survey
CR	central registry
FSA	Family Support Administration
HHS	Department of Health and Human Services
IG	Inspector General
IV-D	Child support cases administered under title IV-D of the Social Security Act
NP	noncustodial parent
OCSE	Office of Child Support Enforcement
SPLS	State Parent Locator Service
URESA	Uniform Reciprocal Enforcement of Support Act
WW	wage withholding



# Introduction

Figure 1.1:

## GAO Background

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### 1984 Amendments:

- Mandated wage withholding for interstate as well as in-state cases
- Required to handle "as their own" case:
  - No further court action
  - No amending support order
- Gave the Congress much hope for more efficient enforcement

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## Background

The 1984 amendments to title IV-D of the Social Security Act made substantial reforms to the nation's child support enforcement program.<sup>1</sup> Both houses of the Congress adopted the amendments unanimously, confident of the promise these reforms held for more efficient and effective enforcement of support orders for more than 11 million children. Wage withholding was considered the reform that held great hope for more efficient enforcement.

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<sup>1</sup>P.L. 98-378.

Under the 1984 amendments, when noncustodial parents become delinquent in their court-ordered<sup>2</sup> child support payments in an amount equivalent to 1 month or more, the local child support office must notify these parents and their employers that subsequent payments are to be withheld from wages.<sup>3</sup> The amount withheld must include the monthly payment, plus an amount to begin to pay off the accrued delinquency.

The noncustodial parents have the right to contest the withholding, but only on the basis of mistakes of fact as to the parents' identity or whether the amount of delinquency is correct. The courts (and administrative entities) are not allowed to consider arguments that the noncustodial parent cannot afford to pay the delinquency or that the original child support award should be amended to a reduced amount.

The law specified that wage withholding was to be used in interstate, as well as in-state, cases. Interstate wage withholding cases include those where the noncustodial parent lives or works in a different state from that of the custodial parent and children.<sup>4</sup> Interstate child support cases are widely acknowledged to be more complex and difficult to enforce than in-state cases, and incur greater delays in collection and lower collection rates.

The Child Support Enforcement programs under title IV-D are jointly funded by the federal and state governments. The states administer the program through state and local offices, which are known as IV-D offices. Whenever an interstate case transaction must occur, as with interstate wage withholding, the state and local IV-D offices in both states are usually involved. For some transactions, a local court in each state also plays a role.

The law and implementing regulations require that a request for wage withholding initiated by an office in the custodial parent's state—the "initiating jurisdiction"—and sent to an office in the noncustodial parent's state—the "responding jurisdiction"—be handled by the responding jurisdiction as it would its own in-state case. Further, the law requires

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<sup>2</sup>Hereafter, our use of the term court order includes an order of administrative process established under state law.

<sup>3</sup>In 1988, the law was again amended (P.L. 100-485) to require immediate income withholding on all new or modified title IV-D orders, thus not waiting for a delinquency to occur.

<sup>4</sup>A recent GAO report (GAO/HRD-92-39FS, Jan. 9, 1992) estimated that at least one-quarter of all child support cases in the United States are interstate cases.

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**Section 1**  
**Introduction**

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implementation of a withholding request without any further action on the original support order by the local court.

In 1988, in a continuing effort to expedite processing of interstate child support cases, HHS issued regulations requiring each state to establish a central registry for receiving, distributing, and responding to all inquiries on interstate IV-D cases.<sup>5</sup> The regulations specify five responsibilities the registries must complete within 10 working days of receiving the request: (1) ensure that documentation submitted with the case (from another state) is reviewed for completeness, (2) forward the case to either the State Parent Locator Service (SPLS)<sup>6</sup> or appropriate agency for processing, (3) acknowledge receipt of the case with the initiating office, (4) ensure that any missing documentation is requested from the initiating state, and (5) inform the IV-D office in the initiating state to which office in the responding state the case was sent for action.

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<sup>5</sup>IV-D child support cases are those administered, under title IV-D of the Social Security Act, by public child support agencies. All other cases are private cases.

<sup>6</sup>Each state operates an SPLS that assists in locating noncustodial parents by contacting other state agencies, such as the departments of motor vehicles, employment security, corrections, and taxation; child support agencies in other states; and military central registries.



Figure 1.2:

## GAO Scope of GAO Survey

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- Universe of 399 IV-D offices serving counties with more than 100,000 population
- Random sample of 136 offices for interviews = 34 percent sample
- Respondents: office directors, supervisors

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### Scope

We conducted a survey of local IV-D child support offices, identifying the universe of 399 local IV-D child support offices that serve counties with more than 100,000 population. This was made possible by the Bureau of the Census's release of the 1990 census of those counties. The counties were matched with a list of over 4,000 local child support offices provided by the Department of Health and Human Services (HHS) Office of Child Support Enforcement (OCSE). We chose the larger counties to enhance the probability that their child support offices would have enough requests for wage withholding from other states to be able to respond, from experience, to our survey.

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**Section 1**  
**Introduction**

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We selected a simple random sample of 136 offices for the survey, which represents a 34 percent sample. We completed interviews with 126 of these offices in 35 states, for a response rate of 93 percent. This size sample assures generalizability of the findings to the universe of IV-D offices serving large counties. We estimate that the sample offices represent a universe of offices that handled between 6 and 10 million IV-D cases during the states' fiscal year 1991. OCSE estimates the nationwide IV-D caseload at 12.8 million cases.<sup>7</sup>

Because we surveyed a sample, rather than the universe of IV-D offices serving counties with populations of more than 100,000, each reported estimate has a sampling error associated with it. The size of the sampling error reflects the precision of the estimate. Sampling errors for this study are calculated at the 95 percent confidence level. Generally, sampling errors for this study are plus or minus 7 percentage points or less, unless otherwise indicated.

The respondents to our survey were local IV-D office directors or casework supervisors of interstate cases. We chose these respondents because they would be close enough to the day-to-day action of all their caseworkers to respond knowledgeably to our questions.

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<sup>7</sup>Draft of Fifteenth Annual Report to the Congress (for the Period Ending September 30, 1990), Department of Health and Human Services, Administration for Children and Families, Office of Child Support Enforcement (Washington, D.C.), table 45.

Figure 1.3:

## GAO Methodology

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- Conducted computer-assisted telephone interviews
- No verification (e.g., case file reviews)
- Estimates cover states' fiscal year 1991

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### Methodology

We conducted computer-assisted telephone interviews (CATIs) with each office director or his designee. This technology permits on-line entry of the respondents' answers on a computer disk. CATIs speed the merging of multiple offices' answers and, ultimately, the analysis.

Telephone surveys are an expeditious method for gathering information, but they provide largely self-reported information and estimates of conditions and timeliness—respondents here provided estimates for their states' fiscal year 1991. GAO did not conduct independent verification of these estimates, such as with case file reviews. Nevertheless, certain of our

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**Section 1**  
**Introduction**

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key findings, presented on later pages, are supported by other recent research that did employ reviews of data from hundreds of case records.

We performed our work from June through September 1991 in accordance with generally accepted government auditing standards except that we did not verify individual responses.

Figure 1.4:

## GAO Two Approaches to Wage Withholding

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- "Pure" wage withholding: the only box checked on transmittal form; single action requested
- Wage withholding "coupled with request for enforcement":
  - Both boxes checked
  - More paperwork accompanies request
  - Often, full URESA package

### Two Approaches to Wage Withholding

When we made preliminary site visits in three states—to familiarize ourselves with the forms, terms, and processes used in interstate wage withholding—we observed widespread use of several versions of Interstate Transmittal Forms, designed and promoted by HHS over the years for use in all jurisdictions. These forms included a variety of boxes in which the initiating office can check the action it requests the responding office to take. These include establishment of paternity, location, income withholding, enforcement of existing order, and establishment of order (see app. I).

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We noted that some offices requested wage withholding only, that is, they checked that box alone, requesting that single action. We designated those requests as “pure wage withholding.” Many others checked both the wage withholding box and the enforcement box, in effect coupling their request for wage withholding with a general request for enforcement. We designated those requests as “wage withholding coupled with enforcement.” These requests were accompanied by considerably more paperwork, usually a full package of URESA forms. Any URESA request usually requires involvement of the local court—involvement that is contrary to the federal law if wage withholding becomes dependent on court involvement.

As agreed with your office, we included both approaches to withholding in our survey because to confine ourselves to pure wage withholding would be to learn only about the best cases. Thus, our survey is divided into sets of questions on both approaches to withholding.

# More Than Six Procedures Used

Figure 2.1:

## GAO More Than Six Procedures Used

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- You inquired about four procedures
- Two other procedures effective

Figure 2.2:

## GAO You Inquired About Four Procedures

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- Procedure that handles case as their own
- URESA registration
- URESA petition
- Model Interstate Income Withholding Act

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### You Inquired About Four Procedures

You requested that we inquire about the four procedures believed to be employed, either singly or in some combination with the others, to effect wage withholding in response to requests from other states' offices. Each of the four procedures is being used across the country. Often, two or more procedures are used by the same office, depending on the circumstances of the case.

The first procedure is the expedited procedure required in the 1984 amendments, whereby withholding must occur without amendment of the support order issued by the initiating jurisdiction or any further court



action in the responding jurisdiction. This procedure was expected to expedite interstate wage withholding.

The second procedure is called URESA registration.<sup>1</sup> Under URESA registration, the responding office legally certifies (i.e., registers) the initiating (out-of-state) court's child support order with the responding court; no new order is established. The registered order is then treated the same as it would be if it had been established by the responding court. This means in practice, however, that the registered order may be subject to modification of any part, such as the amount of support, child custody, and visitation. If registration is required in order to implement the wage withholding order, it is contrary to the 1984 law.

The third procedure, also under URESA, is petitioning, in which the child support office in the responding state petitions its local court to establish and enforce a new child support order, despite an existing order from the initiating jurisdiction's court. The responding office may then use all available tools to enforce the new order, including wage withholding. Again, if petitioning is required in order to implement wage withholding, it is contrary to the 1984 law.

The last procedure is one established by the Model Interstate Income Withholding Act. This too is model legislation, not federal law, developed in 1984 by the American Bar Association and the National Conference of State Legislatures. It was developed to help states meet the interstate withholding requirements of the 1984 law. Under the Model Act, an interstate support order (and its withholding provision) should be implemented outside of URESA. Entry of the order, judicially or administratively, is for the limited purpose of income withholding. The responding state has no jurisdiction to modify it. States are free to adopt the act or not. According to the American Bar Association, 11 states had enacted all or part of it as of September 1989.

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<sup>1</sup>URESAs are model legislation—not federal law—first developed in 1950, and revised in 1952, 1958, and 1968. States are free to enact, and have enacted, different parts or all of any of the versions. Thus URESA has not ensured the uniformity among state laws that it was designed to promote. Nevertheless, URESA has provided the procedures states have traditionally used to handle interstate actions.

Figure 2.3:

## GAO Two Other Procedures Effective

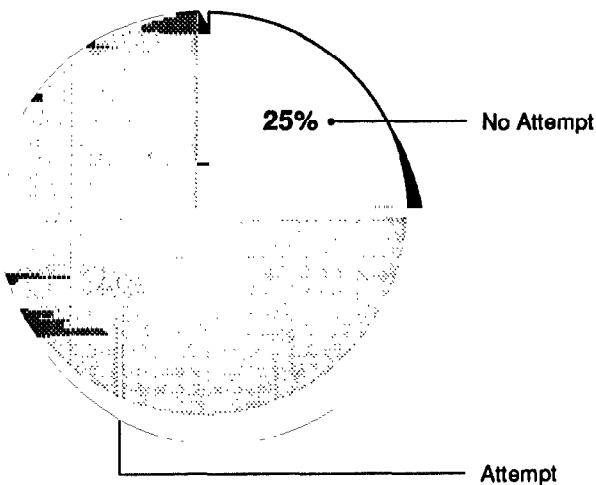
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- Direct service on out-of-state employers
- Service on registered agent

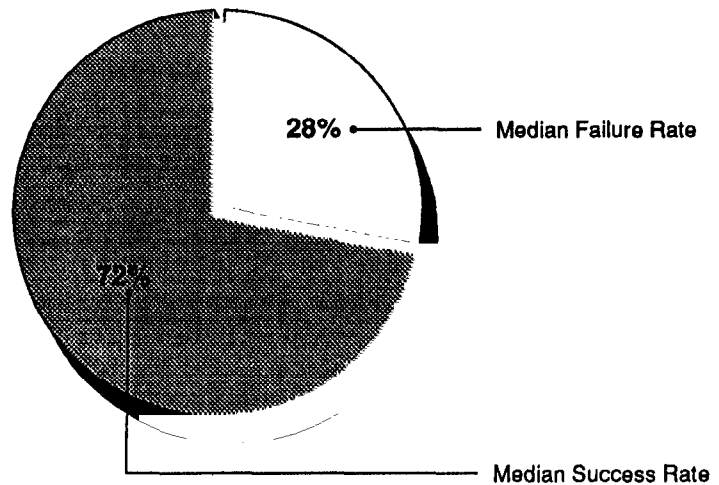
Figure 2.4:

## GAO Direct Service on Out-of-State Employers Widespread, Successful

Percent Offices Attempting Direct Service on Out-of-State Employer



Median Percent Cases on Which Attempt Succeeds



### Direct Service on Out-of-State Employers Widespread, Successful

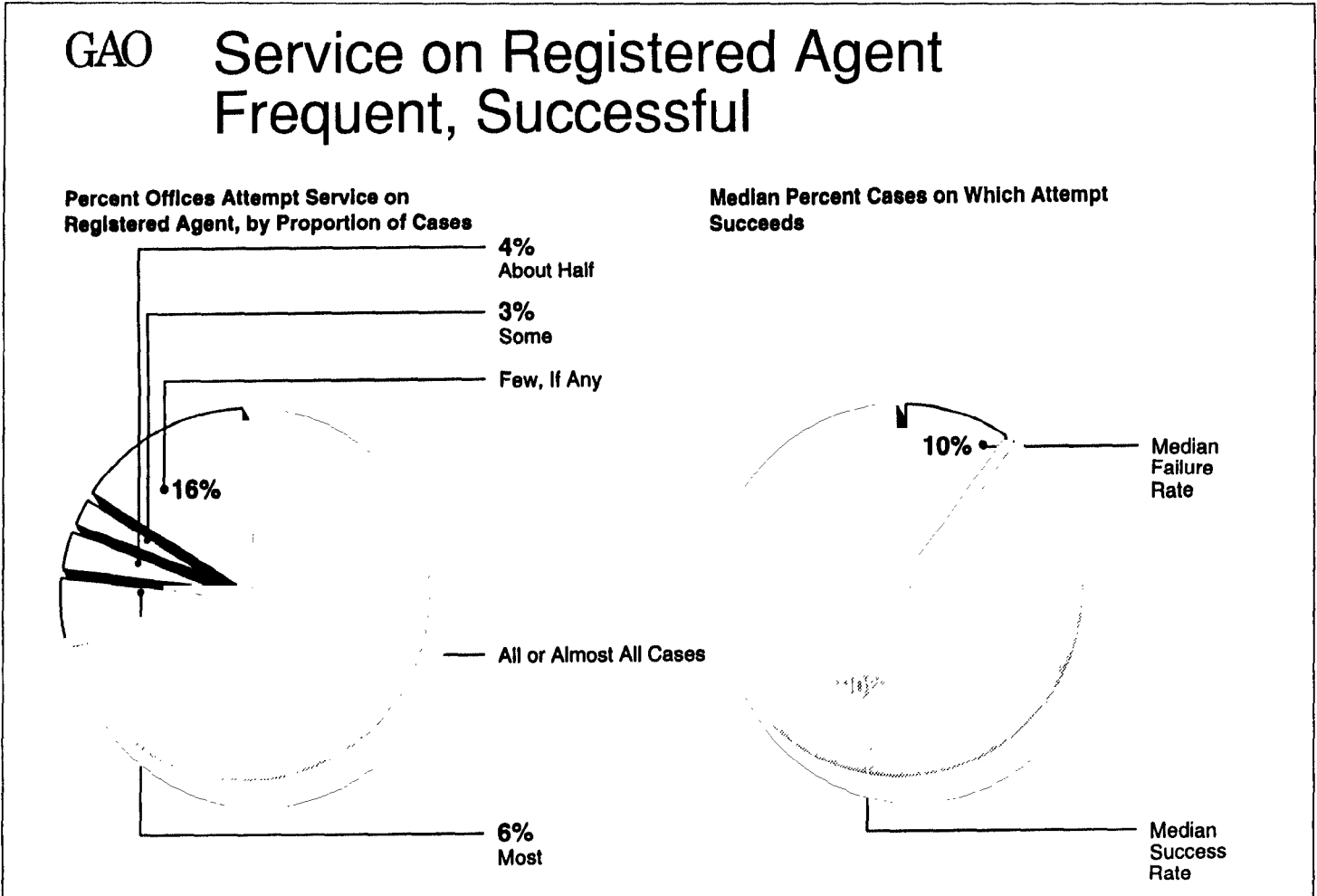
Two procedures other than the four that were the principal focus of our investigation are reported to be effective when the sample offices are initiating wage withholding against noncustodial parents out of state. First, offices report that sending their wage withholding order directly to an employer in the other state, bypassing that state's central registry and the local IV-D office, is a widely attempted and successful procedure. Seventy-two percent of offices report ever attempting this direct service on employers. The median success rate in obtaining withholding by this procedure is 75 percent.

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Employers may not be legally obligated to comply with a direct request for withholding from another state's IV-D office. In many states, they are only obligated to comply with a request submitted by an office in their own state, which is the only state with legal jurisdiction over the employer. Employers who comply with these direct service requests may render themselves legally vulnerable to a lawsuit from the noncustodial parent.

Several of our respondents noted that they try direct service first, rather than go through the other state's central registry. Others reported that they used to do this, but their state offices asked them to cease the practice. In accordance with federal law (P.L. 98-378), HHS makes financial incentive payments to both the initiating and responding state for interstate collections, based on the value of a state's collection-to-administrative-cost ratio. Responding states lose incentive payments when their local employers submit child support payments from withheld wages directly to initiating states' offices, bypassing the local IV-D offices in their own states. This is so because the employer's state is unaware of the direct payments and cannot, therefore, include them in the accounting records the employer's state submits to HHS.

Figure 2.5:



## Service on Registered Agent Frequent, Successful

The second procedure reported to be effective in obtaining wage withholding from out-of-state noncustodial parents is to serve the order on the employer's registered agent in the initiating state. Seventy-seven percent of our sample offices report attempting service on the registered agent in most, all, or almost all cases for which a registered agent has been identified in their state. The median success rate is 90 percent. As with direct service on out-of-state employers, this procedure bypasses the responding state's central registry and local IV-D office, resulting in loss of federal incentive payments to the responding state.

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**Section 2**  
**More Than Six Procedures Used**

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Generally, when a multistate company conducts business in a particular state, it is required to have a designated agent for receiving service of legal process. The agent is usually registered with the state's secretary of state. Such agents are authorized to receive a wage withholding order.

An example better explains a registered agent: If a noncustodial parent works for ABC Inc. in Illinois and an Oregon IV-D office wants to initiate wage withholding for a custodial parent and children in Oregon, the Oregon office can determine if ABC has a facility and registered agent in Oregon. If one is identified, the Oregon IV-D office can submit the wage withholding order to ABC's Oregon office, which transfers it to the Illinois ABC office (or wherever the payroll office is for the noncustodial parent employed at ABC). In this example, Oregon is able to avoid interstate transmittal of the wage withholding order. ABC takes care of it.

# Procedures Lack Uniformity; Congressional Mandates Misunderstood

Figure 3.1:

## GAO Procedures Lack Uniformity

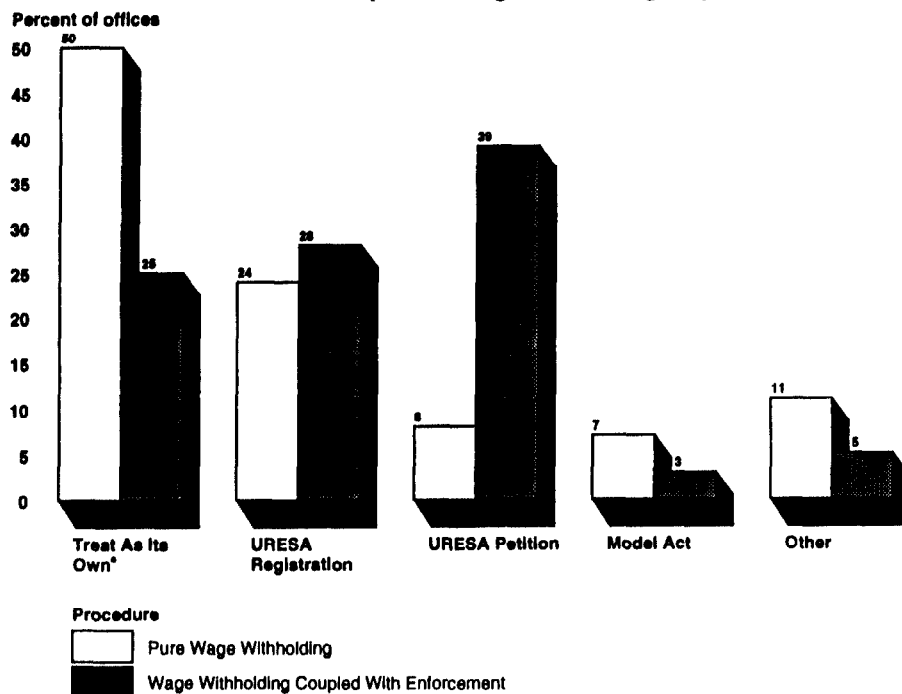
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- Among states
- Among offices within state

Figure 3.2:

# GAO Procedures Lack Uniformity Among States

Procedures Used Most Often to Respond to Wage Withholding Requests at Sample Offices, by Approach



\*Sampling error for the estimate of pure wage withholding is +/- 8 percentage points.

## Procedures Lack Uniformity Among States

We found that procedures lack uniformity among states. Of the four procedures that were the focus of our inquiry, all four were reported to be "most often used" by the offices in responding to pure wage withholding and withholding coupled with enforcement requests from other states' offices.

Half the offices report relying on the expedited procedure that treats an incoming pure wage withholding request as their own case (that is, treats interstate and in-state cases the same, without requiring further court action). This does not involve many cases, however, since only 15 percent



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**Section 3**  
**Procedures Lack Uniformity; Congressional**  
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of all withholding requests received in fiscal year 1991 were pure wage withholding requests. About one-quarter of the offices respond to pure wage withholding by first registering the case with the courts, as a URESA action. Making the withholding contingent on this registration is inconsistent with federal law. Seven percent of the offices most often use procedures under the Model Interstate Income Withholding Act, for pure wage withholding requests. Among those reporting use of some other procedure, a variety of individualized procedures were cited.

When offices were asked if any of the pure wage withholding requests they sent to other states were responded to with URESA registration procedures, 82 percent said they were. When asked if any pure wage withholding requests they sent were responded to with URESA petition procedures, 69 percent<sup>1</sup> of respondents said they were. Again, rendering these wage withholding requests contingent on petitioning and registration is inconsistent with federal law.

Respondents noted they use URESA registration and petitioning because frequently that is what the initiating jurisdiction requested. A few told us that when an initiating office requested URESA registration, the responding office called them and suggested they rescind that request. The office suggested this to avoid the risk that the responding court would reconsider the support amount, visitation, and custody.

In an earlier study, we surveyed 54 states and territories about 12 barriers to interstate collections.<sup>2</sup> Thirty states cited different policies and procedures among states as a frequent barrier (second only to insufficient staff).

Uniformity in procedures, terms, and forms has long been believed to be essential to effective communication and efficiency in the interstate child support program. Attempts have been made to bring more uniformity to the program—in the Uniform Reciprocal Enforcement of Support Act in 1950 and through its several revisions, in numerous regulations and transmittals issued by HHS, and in the wage withholding provision of the 1984 amendments.

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<sup>1</sup>The sampling error for this estimate is +/- 8 percentage points.

<sup>2</sup>Interstate Child Support: Case Data Limitations, Enforcement Problems, Views on Improvements Needed. (GAO/HRD 89-25, Jan. 27, 1989), p. 21.

Figure 3.3:

## GAO Procedures Lack Uniformity Among Offices Within State

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- Of 25 states with multiple offices in sample:
  - 2-4 different procedures "most often used" within 16 states
  - Single procedure most often used within 9 states

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### Procedures Lack Uniformity Among Offices Within States

Among 25 states with multiple offices in our sample, 16 states' offices report two to four different procedures were "most often used" to respond to requests for pure wage withholding and those coupled with requests for enforcement. In the remaining 9 states, all offices within each state reported using the same procedure. The lack of uniformity within the 16 states requires initiating jurisdictions to have knowledge of responding jurisdictions' individual procedures, rather than simply knowledge of state law.

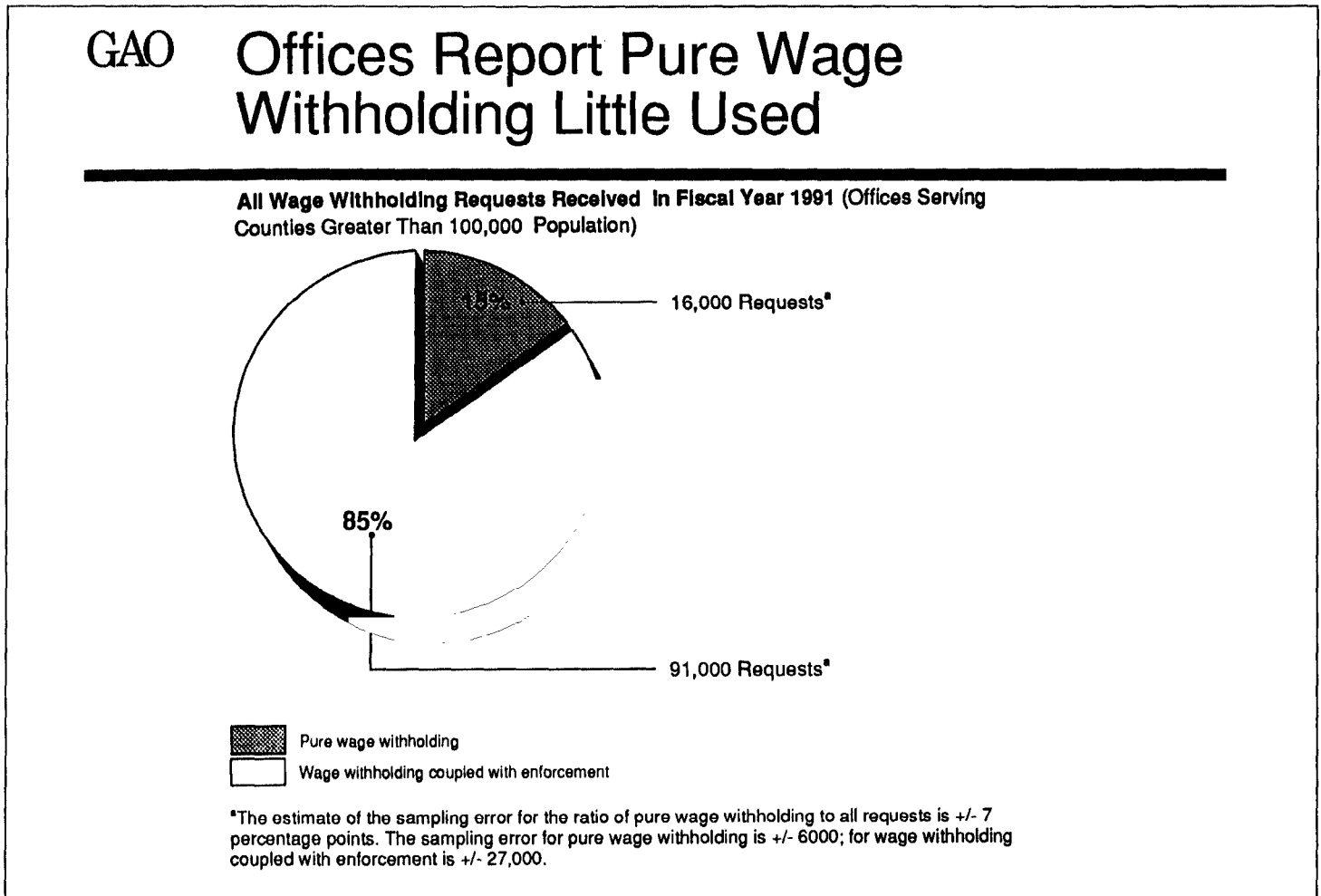
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The diversity of procedures among offices within states leads to confusion for initiating and responding offices. Many reported they did not know what they need to send to the other jurisdictions. Similarly, offices reported that from their vantage as responding jurisdictions, the initiating offices do not know what the responding offices require. In one of our three site visits, for example, a Virginia office reported frequently receiving URESA forms for registering a request for pure wage withholding, even though Virginia's administrative process treats an incoming wage withholding request as it would its own in-state case.

Figure 3.4:



### Offices Report Pure Wage Withholding Little Used

Fifteen percent of all wage withholding requests received by IV-D offices during states' fiscal year 1991 were for pure wage withholding. Eighty-five percent of the requests were for wage withholding coupled with a request for enforcement. In explaining why they receive (and send out) so few pure wage withholding requests, a few respondents explained that if the noncustodial parent has left the employer, the initiating office has to send new paperwork. They believe that any request for wage withholding must be specific to the noncustodial parent's current employer. OCSE believes it is more likely that the responding office sends the request back, reporting

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that the noncustodial parent is no longer with that employer and that the initiating office must find the new employer.

Other explanations included, "Some jurisdictions can't handle our request for pure wage withholding administratively (without court action) so they ask us to file URESA." "Some jurisdictions won't honor a request for pure wage withholding".

Figure 3.5:

GAO Pure Withholding Precludes Other  
Enforcement Remedies

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- Medical support enforcement
- Review and modification of award
- Interception of tax refunds
- Collection of arrearage on welfare debt

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Pure Wage  
Withholding Precludes  
Other Enforcement  
Remedies

In addition to the previous explanations, a few respondents explained that a pure wage withholding request precludes the use of other congressionally mandated enforcement remedies or activities. These include medical support enforcement, review and modification of child support awards, interception of state income tax refund checks, and collection of child support arrearages to repay state and local welfare debt. HHS confirms that in most states, these enforcement remedies cannot be used when wage withholding, alone, has been requested. For these reasons, a median 106 requests for wage withholding coupled with

enforcement per office were received during states' fiscal year 1991, versus a median 14 requests per office for pure wage withholding.

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### **Medical Support Enforcement**

Initiating offices believe they cannot enforce a medical support order through the responding office in another state if they have asked for wage withholding alone. The 1984 amendments that require the use of wage withholding to collect delinquent and ongoing child support payments also require the IV-D offices to petition for medical support in new or modified child support orders. This obligates the noncustodial parents to include their children in any health insurance policy provided by their employer, if it is available to the parent at reasonable cost.

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### **Review and Modification of Child Support Awards**

A few respondents explained that they want the opportunity, on behalf of the custodial parent and children living in another state, to review and modify an old, out-of-state award against their own state's guideline. The respondents want other states' offices to have that opportunity on behalf of custodial parents and children living in the initiating sample jurisdictions. But respondents believe they cannot review and modify, nor expect other offices to review and modify, their orders for them if wage withholding alone has been requested.

In 1988, the Congress again amended the child support statute to require, among other things, that states (through their local offices) review and modify existing IV-D child support awards in accordance with state guidelines and their state plan.<sup>3</sup> Guidelines are numeric formulas that every state must develop, and judges must use, to establish the appropriate level of child support awards.

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### **Interception of Tax Refund Checks**

The 1984 amendments also required states to use, as an enforcement remedy for delinquent child support payments, the interception of state income tax refund checks. A few respondents report their state law permits them to use this technique even if the other jurisdiction has requested only wage withholding. But others report their state law requires that they must receive a general request for enforcement in order to intercept tax refunds from their state's revenue department.

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<sup>3</sup>P.L. 100-485 (Oct. 13, 1988).

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**Collection of Arrearages to  
Repay Welfare Debt**

Finally, offices want to be able to collect arrearages from noncustodial parents living in another state to repay offices' state agency for welfare expenditures they have made to custodial parents and children living in their jurisdiction. This situation arises when the custodial parent and children are no longer on welfare and are not owed current support, but were recipients of welfare payments in the past. The state wants to collect child support payments from the noncustodial parent to repay those welfare expenditures, but offices report they cannot expect the responding state's office to do so if the initiating office requests only wage withholding.



Figure 3.6:

GAO Congressional Mandates  
Misunderstood

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- Coupling requests contrasts with congressional and HHS expectations; delays implementation
- Offices couple requests to meet other congressional mandates for other enforcement remedies

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Congressional  
Mandates  
Misunderstood

The legislative history suggests that coupling requests for withholding with requests for general enforcement delays implementing withholding and contrasts with congressional and HHS expectations. The Congress expected interstate wage withholding to be an expedited procedure that avoided traditional URESA procedures. Moreover, HHS's director of policy in the Office of Child Support Enforcement (OCSE) told us that OCSE had expected interstate wage withholding to be effected outside of the

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cumbersome URESA process, and that it would have been a simple and expedited procedure.<sup>4</sup>

Offices are required to meet congressional mandates for other enforcement remedies, but they misunderstand that wage withholding should proceed, irrespective of other enforcement remedies being pursued. Instead of immediately implementing the wage withholding portion of the request, however, offices couple their requests for withholding with requests for other enforcement remedies. Then, state law, administrative practice, or judicial interpretation requires them to use URESA procedures. This dilemma appears to be illustrated in excerpts from an article published in OCSE's regular newsletter:

In several recent visits to state and local child support enforcement agencies OCSE Deputy Director ... found a heavy reliance among caseworkers on using URESA to initiate interstate wage withholding action. She said "The URESA petition unquestionably has a role to play in interstate enforcement actions but wage withholding is not one of them."

However, the article concluded:

If other enforcement remedies are being pursued in addition to wage withholding, a URESA action may be advisable because in most states, an order for interstate income withholding limits the court's jurisdiction to enforcement by withholding only.<sup>5</sup>

In our opinion, however, the Congress expected the wage withholding part of any request to proceed, not to become contingent upon URESA and the other enforcement remedies being pursued.

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<sup>4</sup>More recently, OCSE told at least one state that it may register the wage withholding order only so long as it does not delay withholding and does not register the underlying child support order.

<sup>5</sup>HHS, OCSE, Child Support Report (Nov./Dec. 1990), pp. 4-5.

# Withholding Not Timely

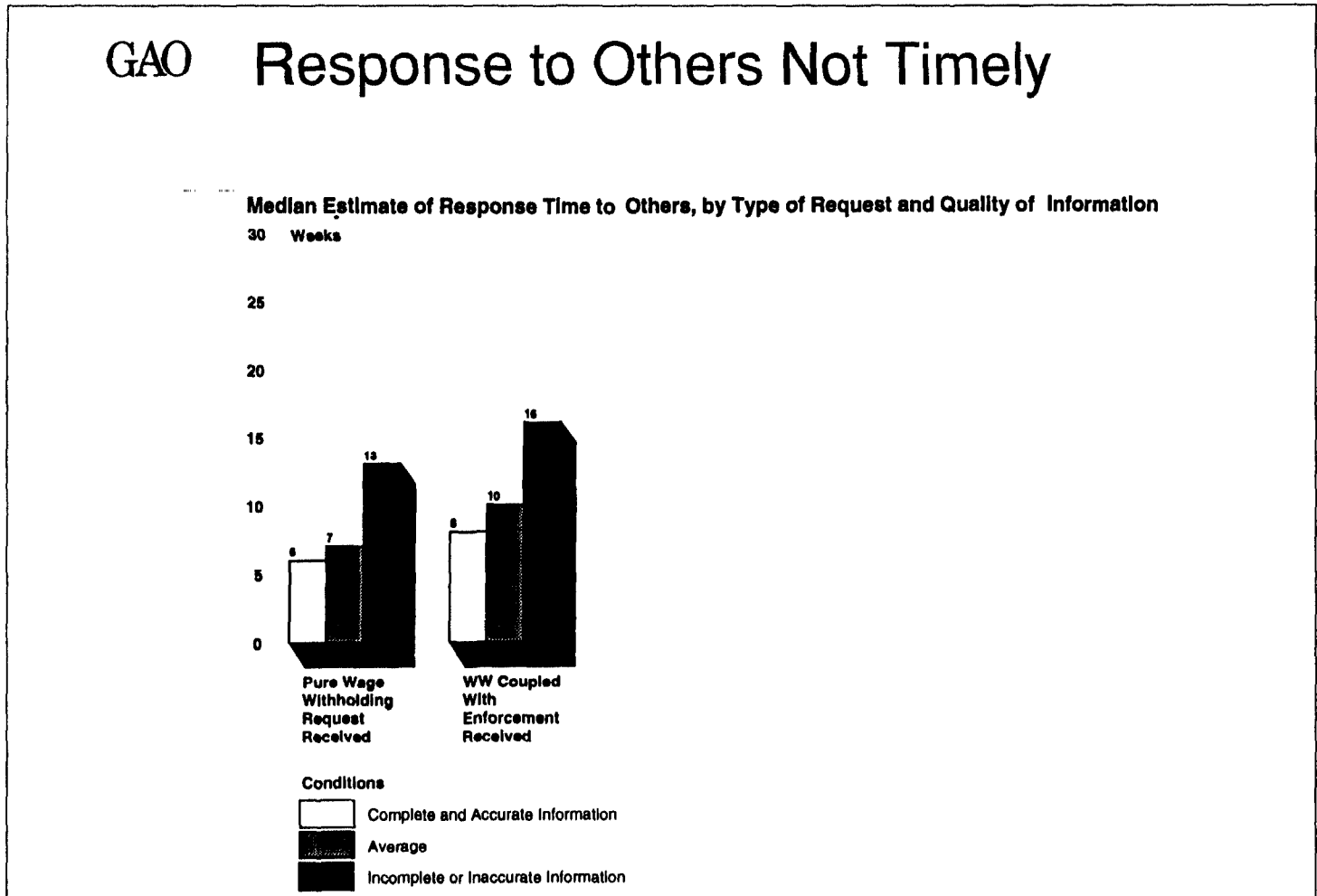
Figure 4.1:

## GAO Withholding Not Timely

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- Response to others not timely
- Others' response less timely
- In-state withholding more timely

Figure 4.2:



Note: Self-reports of median weeks from receipt of wage withholding request from other states until service of order on employer.

## Response to Others Not Timely

Respondents were asked to estimate average times they take to respond to an out-of-state request for wage withholding, from the day it is first received by their state central registry to the day they serve an order on the employer. Respondents report median times of 6, 7, or 13 weeks for a pure wage withholding request. The times vary by whether we asked only about cases where all the information received is complete and accurate, all cases, or only cases where the information received is incomplete or inaccurate. For wage withholding coupled with requests for enforcement, respondents report median times of 8, 10, and 16 weeks, respectively.

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**Section 4**  
**Withholding Not Timely**

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Complete and accurate information includes

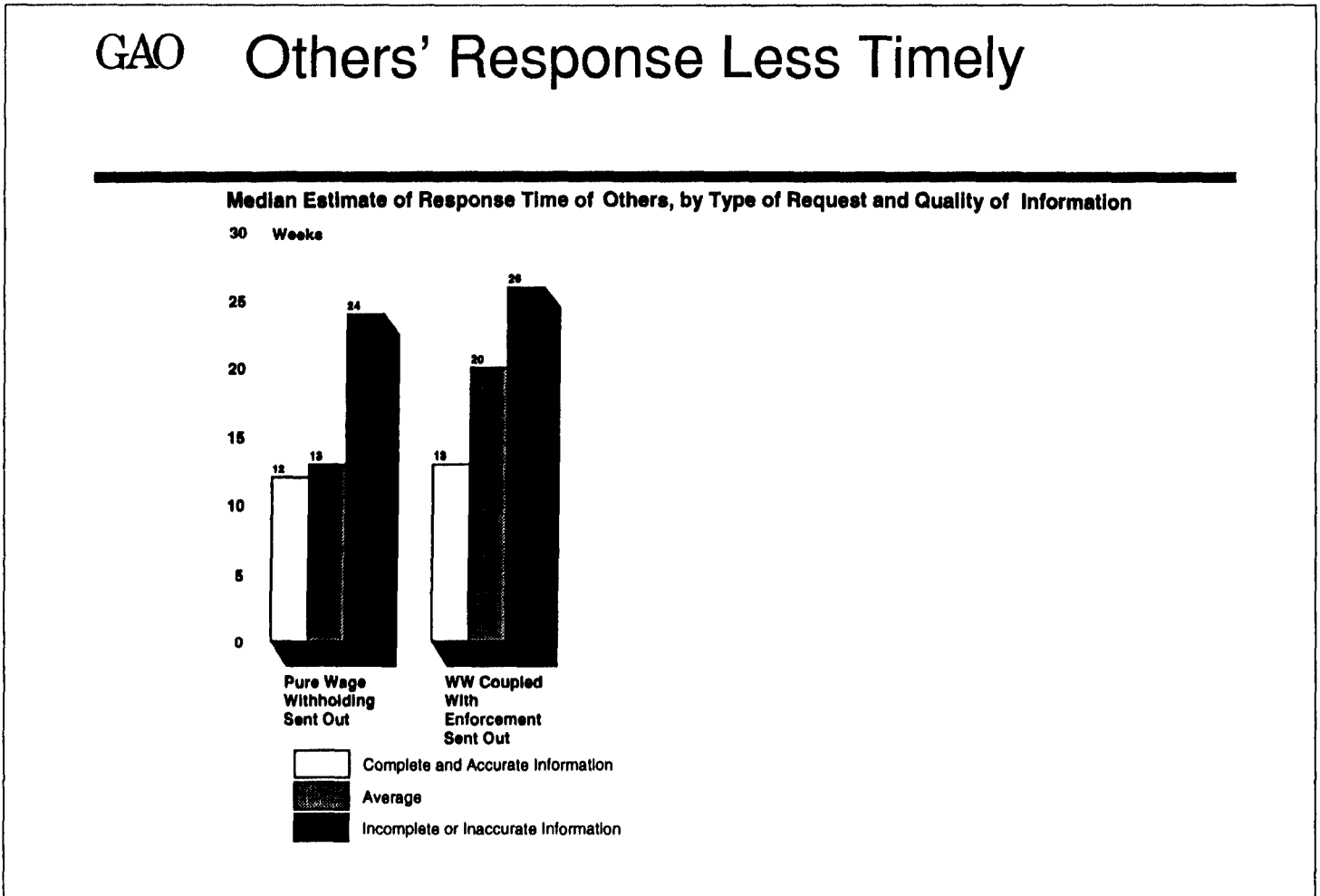
- a complete and accurate address for the noncustodial parent,
- enough employer information to process the request,
- copies of the initiating state's child support order,
- a statement of arrearage (amount of delinquent support), and
- the monthly amount to be withheld from wages.

Incomplete or inaccurate information includes cases where one or more of the above is missing from the paperwork transmitted or is no longer current.

The range of time it takes respondents to serve a withholding order on an employer is 2 to 59 weeks for pure wage withholding. The range is 2 to 94 weeks for wage withholding coupled with requests for enforcement.

These estimates do not include the total time it takes for custodial parents and their children to receive money they are owed. Additional time is taken to prepare the request in the initiating jurisdiction, collect the money from the employer in the responding jurisdiction, transmit it to the initiating jurisdiction, and distribute it to the custodial parent there.

Figure 4.3:



Note: Median weeks from sending request to other offices until other offices obtain withholding order.

### Other Offices' Response Less Timely

The number of weeks our respondents say it takes other offices to respond to their requests for withholding is longer than the weeks they say it takes them to respond to other offices' requests. Asked to report on the time it takes other offices to obtain wage withholding orders for our respondents, from the day respondents initiate a pure wage withholding request to the day the order takes effect in the responding jurisdiction, respondents report that it takes others median times of 12, 13, or 24 weeks. It depends on how complete and accurate the information respondents sent turns out to be. They report it takes median times of 13, 20, or 26 weeks for other

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offices to effect withholding orders when wage withholding coupled with enforcement is requested.

The range of time respondents say it takes other offices to obtain a withholding order for them is 4 to 99 weeks for pure wage withholding. The range is 4 to 100 weeks for wage withholding coupled with requests for enforcement.

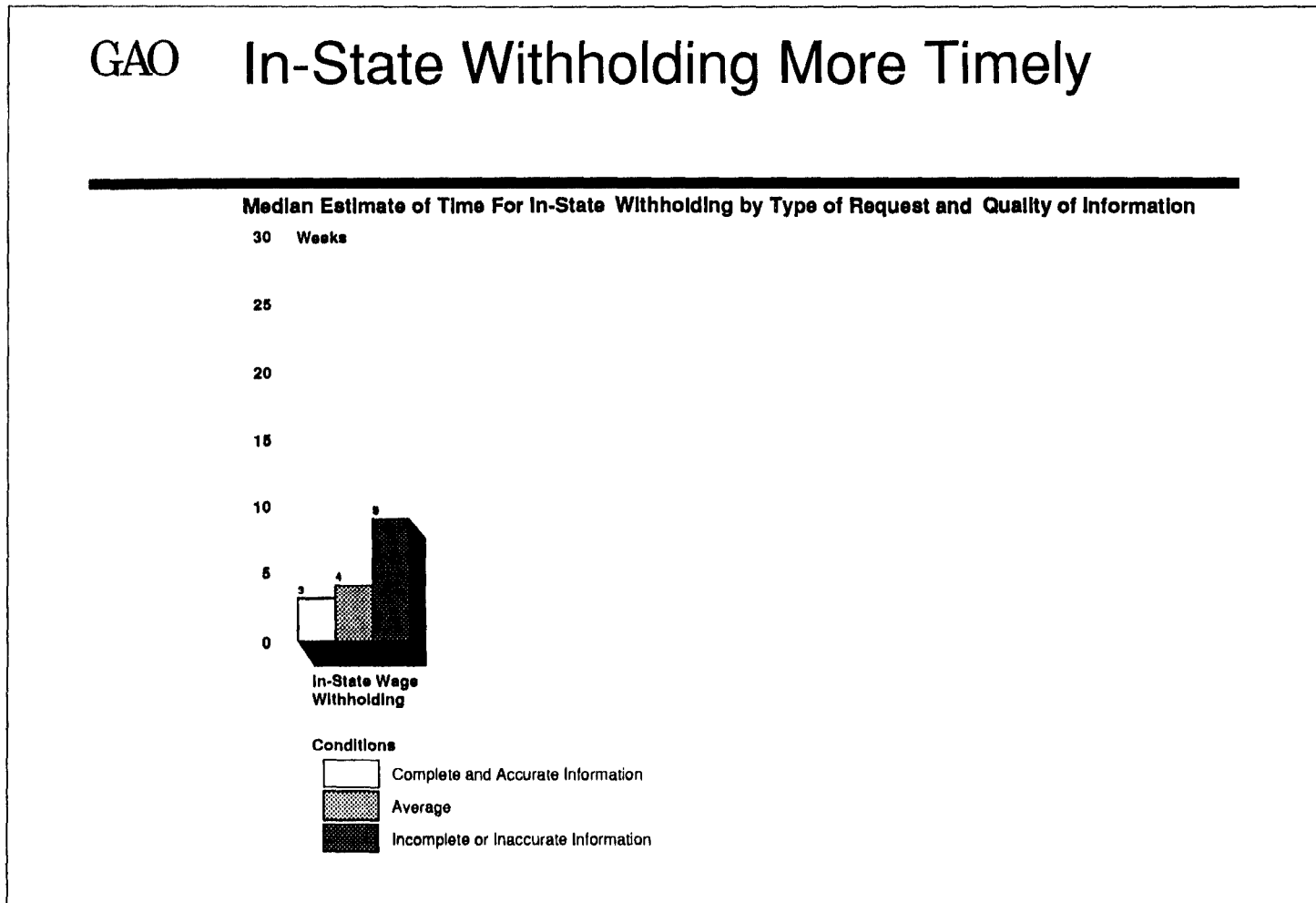
In these cases, the estimates include time taken in responding states' central registries. As before, though, additional time is taken to collect from the employer in the responding jurisdiction, transmit to the initiating jurisdiction, and distribute to the custodial parent and children there.

The estimates on time lapses in figures 4.2 and 4.3, regarding incomplete or inaccurate information in wage withholding coupled with enforcement requests, is supported by our earlier study on interstate child support.<sup>1</sup> We reported that when initiating offices lack address and employment data for out-of-state noncustodial parents, they often use the lengthy, cumbersome civil procedures outlined in URESA to pursue cases. We found that demonstration projects in Maryland, Connecticut, and Michigan, as well as our review of 50 cases sent by other states to Alameda County, California, indicate that cases pursued using these procedures usually took about a year to process and that most do not result in collections.

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<sup>1</sup>Interstate Child Support: Better Information Needed on Absent Parents for Case Pursuit (GAO/HRD-90-41, May 24, 1990), p. 14.

Figure 4.4:



Note: Median weeks to initiate in-state withholding order until order takes effect.

## In-State Withholding More Timely

Self-reports of the median time to initiate a wage withholding order on an in-state case and serve an order on the employer (when both the custodial and noncustodial parent are located in the same jurisdiction) is 3, 4, or 9 weeks. It, too, depends on the completeness and accuracy of the information on hand. The range is 1 to 75 weeks. Again, additional time is taken to collect from the employer and transmit the money to the custodial parents and children.



# Multiple Factors Contribute to Delays

Figure 5.1:

## GAO Multiple Factors Contribute to Delays

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- Top three ranked by respondents
- Information supports top three factors
- We identified four additional factors

Figure 5.2:

## GAO Top Three Factors Contributing to Time

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- Missing or inaccurate NP address or employer information
- NP left employer by time order was served
- Size of caseworkers' caseloads
  - Few ranked own procedures as contributing to time

---

### Top Three Factors Contributing to Time

Respondents were read a list of 12 factors that might contribute to the time it takes to obtain wage withholding for other states' offices (see app. II). They were asked to indicate the factors that contribute the most, second most, and third most time to this process in their localities. Respondents report most frequently that (1) missing or inaccurate noncustodial parent address or employer information contributes the most time; (2) noncustodial parents who have left the employer by the time the order is served contribute the second most time; and (3) the size of the caseworkers' caseload contributes the third most time. Few respondents

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**Section 5**  
**Multiple Factors Contribute to Delays**

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ranked their own procedures among the top three factors contributing to time.

A study conducted by Mathematica Policy Research, Inc. tends to support the first two factors.<sup>1</sup> Based on reviews of case record data from 1,900 cases and staff surveys in 30 offices in 11 states, they found that

Based on the opinions of agency staff and on data from the case files, the difficulty of obtaining information on the obligor's employer or employment status and the timeliness of such information are major barriers to implementing withholding....The case files of 42 percent of AFDC cases whose payments were in arrears did not indicate whether the obligor was employed.<sup>2</sup>

Findings from our earlier survey of 54 states and territories corroborates the third factor.<sup>3</sup> More states—43—cited insufficient staff for timely processing as a barrier to interstate collections than any other barrier listed.

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<sup>1</sup>Anne R. Gordon and others, Income Withholding, Medical Support, and Services to Non-AFDC Cases After the Child Support Amendments of 1984 (HHS, May 1991), p. 3.

<sup>2</sup>Obligor is synonymous with noncustodial parent.

<sup>3</sup>Interstate Child Support: Case Data Limitations, Enforcement Problems, View on Improvements Needed (GAO/HRD-89-25, Jan. 27, 1989), p.21.

Figure 5.3:

GAO Information Supports Top  
Three Factors

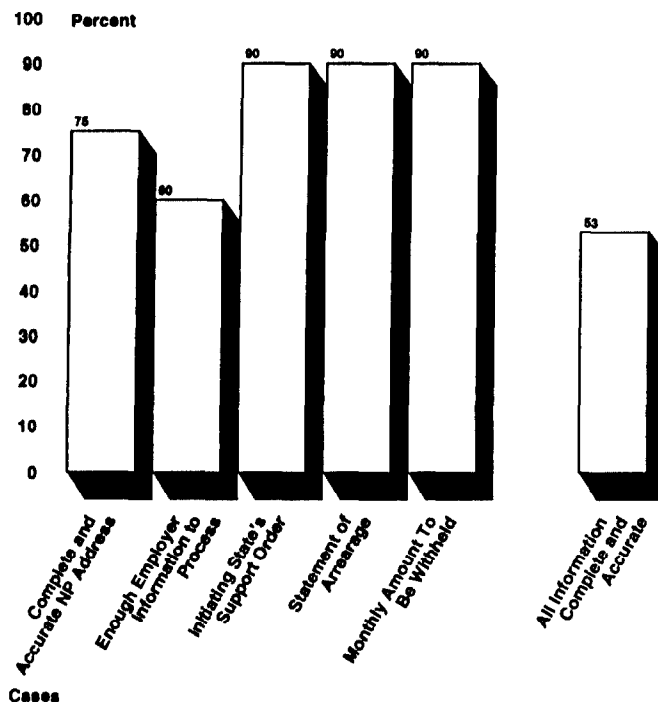
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- Offices report missing and inaccurate information
- Noncustodial parent employment not stable
- Caseloads per worker are large

Figure 5.4:

## GAO Offices Report Missing and Inaccurate Information

Median Percent Cases Received by Presence of Information



### Offices Report Missing and Inaccurate Information

Respondents' median estimate is that just over half of the cases received have all the information complete and accurate. Fully 90 percent are received with copies of the initiating state's child support order, with the statement of arrearage (delinquency accrued), and with a determination of the monthly amount to be withheld from wages. Seventy-five percent are received with a complete and accurate address for the noncustodial parent. However, the most vital information—enough employer information to process the request—is absent in 40 percent of the cases.

Figure 5.5:

## GAO Noncustodial Parents' (NP) Employment Not Stable

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- In 25% of cases, NP reported to have left employer by time order is served
- Comparable with Mathematica Policy Research finding: duration of withholding spells is 6 months or less
- Unemployed
- Self-employed

### Noncustodial Parents' Employment Not Stable

Respondents estimate that in one-quarter (median estimate) of the cases, the noncustodial parent has left the employer by the time the order is served. Further, 44 percent of the offices report that half or more of those parents turn out to be unemployed.<sup>4</sup> An additional 13 percent (median estimate) of cases are found to involve parents who are self-employed, so wages cannot be withheld. The instability of employment is again supported by Mathematica Policy Research's review of data from 1,900 case records. They found that the duration of withholding spells (i.e., the number of months wage withholding lasted on a sample of cases) is 6

<sup>4</sup>The sampling error for this estimate is +/- 8 percentage points.

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**Section 5**  
**Multiple Factors Contribute to Delays**

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months or less in 40 percent of welfare cases and 28 percent of nonwelfare cases.<sup>5</sup> About half of the withholding spells ended because employment with that employer ended.

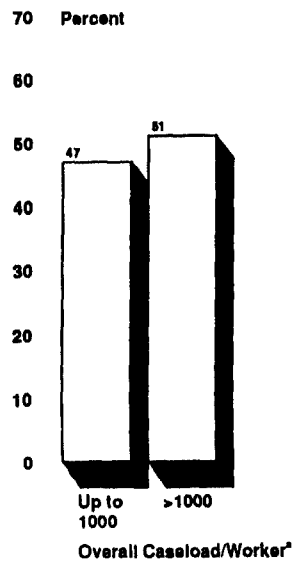
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<sup>5</sup>Anne R. Gordon, p.38.

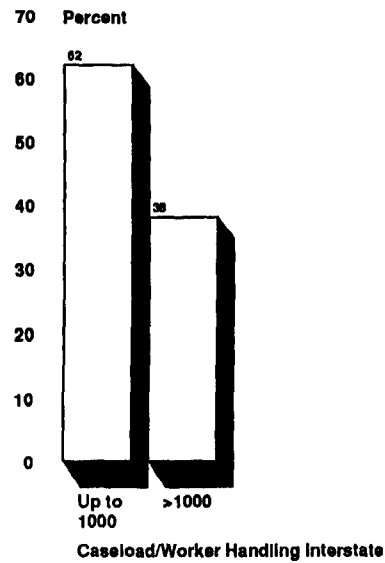
Figure 5.6:

## GAO Caseloads Per Worker Are Large

Caseloads Per Worker Overall



Caseloads Per Worker Handling Interstate Cases



\*Does not add to 100 due to rounding.

### Caseloads Per Worker Are Large

Just over half the offices report overall caseloads per worker exceed 1,000, while 38 percent report exceeding 1,000 cases per worker for those who handle interstate cases. One-quarter of the offices report caseloads per worker handling interest cases exceed 1,500.

The median overall caseload per worker among offices is 1,000; the median caseload for workers who handle interstate cases is 850. This may reflect some acknowledgement that interstate cases are more complex and difficult to process than in-state cases.



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**Multiple Factors Contribute to Delays**

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Six percent of the offices report having a workload standard, which establishes the number of cases a worker ought to be able to handle. The median workload standard is 425 cases per worker.

Figure 5.7:

## GAO We Identified Four Additional Factors

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- Some offices lack computer automation
- Familiarity with interstate withholding rated low
- Central registries do not screen and verify some information
- Court hearings are delayed

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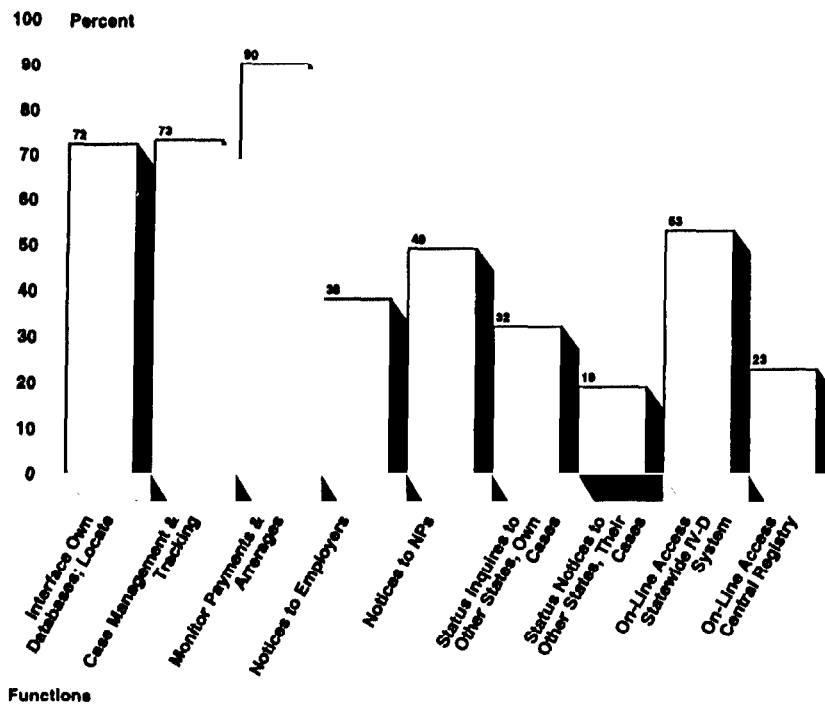
### We Identified Four Additional Factors

Besides the three factors respondents ranked as those contributing the most time to processing wage withholding requests, our analysis reveals additional factors that may exacerbate delays. These include a lack of computer automation, little familiarity with interstate withholding, central registries that do not screen and verify some information, and delays in court hearings.

Figure 5.8:

# GAO Some Offices Lack Computer Automation

Offices With Selected Activities Automated



## Some Offices Lack Computer Automation

Sixty-two percent of offices do not have systems that can automatically generate required withholding notices to employers; 51 percent do not have systems that generate the required advance notices to noncustodial parents; 68 percent do not have systems capable of generating status inquiries to other states about cases our respondents have sent out; 81 percent do not have systems capable of generating notices to other states about the status of cases they have sent into our responding offices.

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**Multiple Factors Contribute to Delays**

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Almost half (47 percent) the offices lack on-line access to their statewide IV-D automated systems. Of those lacking such access, however, some noted that their state does not yet have a statewide automated system.<sup>6</sup>

Seventy-two percent of offices told us they have automated systems that interface with other data bases in their own state to assist in locating noncustodial parents. These include one or more data bases such as at the departments of motor vehicles, revenue, employment security, and fish and game (licensing). Similarly, 73 percent have automated systems that perform case management and tracking for caseworkers. Ninety percent have systems that monitor monthly payments and arrearage accumulations. Nevertheless, the lack of automation in some offices is a concern given the large caseloads per worker handled by these offices.

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<sup>6</sup>HHS has been authorized to provide 90 percent federal matching funds since 1980, for the design, development, and installation of statewide automated IV-D systems. By October 1995, all states must have their systems certified by HHS and operational, statewide. At that time, the 90 percent federal funding ceases.

Figure 5.9:

## GAO Familiarity With Interstate Withholding Rated Low

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- Supervisors rate others' familiarity with interstate withholding procedures as fair or poor:
  - Caseworkers: 27%
  - Attorneys: 31%
  - Judges: 59%<sup>a</sup>

<sup>a</sup> The sampling error for this estimate is +/- 8 percentage points.

### Familiarity With Interstate Withholding Rated Low

On a scale of excellent, good, fair, or poor, the office directors and supervisors we interviewed rated some other workers' familiarity with interstate wage withholding as fair or poor. Of those responding to the questions, 27 percent of the offices rated caseworkers' familiarity as fair or poor; 31 percent rated their attorneys' familiarity as fair or poor; and 59 percent rated the judges' familiarity as fair or poor.

Inadequate training may account for these ratings. Asked to what extent caseworkers, attorneys, and judges had had formal classroom or on-the-job

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Multiple Factors Contribute to Delays**

training in interstate enforcement procedures, respondents reported that all had had training in the following proportions:

**Table 5.1: Respondents' Reports of Training Frequency**

	Training	
	Classroom	On-the-job
All caseworkers	43%	80%
All attorneys	25	53 <sup>a</sup>
All judges	15 <sup>b</sup>	20 <sup>a</sup>

<sup>a</sup>The sampling error for these estimates is +/- 9 percentage points.

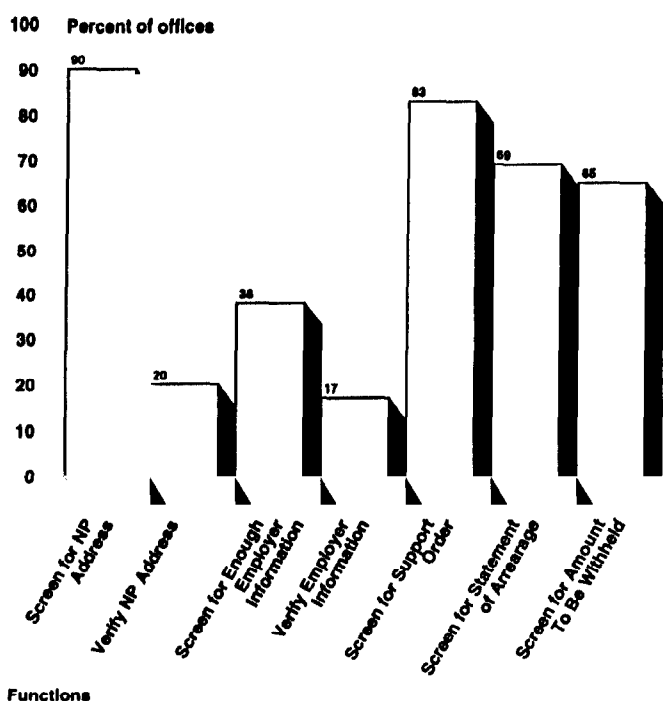
<sup>b</sup>The sampling error for this estimate is +/- 8 percentage points.

Two points bear mentioning. First, the responses about attorneys' and judges' training is a rough estimate since many respondents did not know what training these two groups had actually received. Second, though 80 percent of the offices report all their caseworkers received on-the-job training, they may have received it from other caseworkers whose familiarity with appropriate interstate withholding procedures is limited.

Figure 5.10:

# GAO Central Registries Do Not Screen and Verify Some Information

Functions Performed by Central Registries



## Central Registries Do Not Screen and Verify Some Information; Yet Still Not Timely

Central registries are not screening and verifying as much information as they might, yet some take longer than the 10 working days permitted by HHS regulations to send the case onto the appropriate offices. About 30 percent of the offices report it takes 21 days or longer to receive a case from their central registry.<sup>7</sup> The range for all offices is from 2 to 120 days.

Large majorities report their state's central registry screens for the presence of an address for the noncustodial parent and, for the support order, statement of arrearage and amount to be withheld, monthly. But few

<sup>7</sup>The sampling error on this estimate is +/- 8 percent.

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(20 percent) verify the parents' address, and fewer (17 percent) verify the critical employer information. Less than 40 percent screen the incoming paperwork for the presence of enough employer information to allow the local office to process the request. Failure to screen for these items falls short of the HHS regulations regarding registries' responsibilities for ensuring that documentation submitted is reviewed for completeness.

Central registries' failure to verify does not make them out of compliance with their regulatory responsibilities. They are required to screen case documentation for completeness, but not to verify accuracy. However, more verification by central registries, with assistance from the SPLS, might prevent the 47 percent of cases that offices report receiving without all the information complete and accurate.



Figure 5.11:

## GAO Court Hearings Delayed

- Median number of days from case referred to court to hearing day is 42
- One-third of offices report average number of days at 50 or more<sup>a</sup>

<sup>a</sup> The sampling error for this estimate is +/- 8 percentage points.

### Court Hearings Delayed

The median number of days that offices say it takes from the day they refer an interstate wage withholding case to court to the day a hearing is held is 42 days. Thirty-two percent of the offices report it takes 50 or more days.<sup>8</sup> The range is 4 to 120 days.

Hearings can include those held in URESA petitioning cases, in which the responding office petitions the court to establish a new child support order, and those held as a result of noncustodial parents who contest a wage withholding order. In addition, hearings include those that may be

<sup>8</sup>The sampling error for this estimate is +/- 8 percentage points.

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held in URESA registration cases, in which the court may reconsider the initiating court's child support award level as well as matters of custody and visitation.

# Respondents Made Suggestions for Improvement

Figure 6.1:

## GAO Respondents Made Suggestions for Improvements

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- Legalize direct service on out-of-state employers
- Create more uniformity
- Provide more caseworker training
- Make central registries more efficient
- Prevent states from asking for registration

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### Respondents Made Suggestions for Improvement

We concluded the interviews by asking respondents if they had any comments, suggestions, or recommendations about the operation of interstate wage withholding. The most prevalent suggestion was that the Congress pass federal legislation requiring employers to honor child support orders (and the wage withholding language in them) sent directly to them from other states' offices. In essence, respondents are asking the Congress to statutorily authorize the procedure they already employ with marked success (discussed on p. 25).

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**Section 6**  
**Respondents Made Suggestions for**  
**Improvement**

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Some respondents made other suggestions: (1) increase uniformity among the procedures and forms being used, (2) increase caseworker training in appropriate interstate procedures, (3) make central registries more efficient, and (4) prevent states' IV-D offices from requesting URESA registration when it is not required by the responding jurisdiction's court.



# HHS Interstate Transmittal Form

## CHILD SUPPORT ENFORCEMENT TRANSMITTAL

PLAINTIFF/PETITIONER

DEFENDANT/RESPONDENT

TO: RESPONDING CENTRAL REGISTRY,  
COURT OR AGENCY (ADDRESS)

FROM: INITIATING CONTACT PERSON  
(AGENCY AND ADDRESS)

IV-D NON AFDC  
 IV-D AFDC/IV-E FOSTER CARE  
 NON IV-D

INITIATING CASE/DOCKET NO.

FIPS CODE      COUNTY/STATE

OTHER REFERENCE NO.

FIPS CODE      RESPONDING CASE/DOCKET NO.      COUNTY/STATE

OTHER REFERENCE NO.

FILE STAMP

IF COLLECTION LOCATION IS NEW OR DIFFERENT LIST IN SECTION VI, PAGE 2.

**I. ACTION REQUESTED**       Please return the Acknowledgment attached

<p>1. <input type="checkbox"/> LOCATION OF</p> <p style="margin-left: 20px;">A. <input type="checkbox"/> ABSENT PARENT      C. <input type="checkbox"/> ASSETS</p> <p style="margin-left: 20px;">B. <input type="checkbox"/> EMPLOYER AND WAGES      D. <input type="checkbox"/> OTHER INFORMATION TO ASSIST IN LOCATION</p>	<p>7. <input type="checkbox"/> ENFORCEMENT OF EXISTING ORDER (URESА)</p> <p>8. <input type="checkbox"/> REGISTRATION OF FOREIGN SUPPORT ORDER (URESА)</p> <p>9. <input type="checkbox"/> CHANGE OF PAYEE (E.G., AFDC STATUS CHANGE)</p> <p>10. <input type="checkbox"/> REDIRECT PAYMENT (E.G., CUSTODIAN HAS MOVED)</p> <p>11. <input type="checkbox"/> ADMINISTRATIVE REVIEW FOR FEDERAL TAX OFFSET</p> <p>12. <input type="checkbox"/> DOCUMENTATION OF INFORMATION (FEDERAL TAX OFFSET)</p> <p style="margin-left: 20px;">A. <input type="checkbox"/> VERIFICATION OR PROVISION OF SSN</p> <p style="margin-left: 20px;">B. <input type="checkbox"/> VERIFICATION AND PROVISION OF SUPPORT ORDER AND ANY MODIFICATIONS</p> <p style="margin-left: 20px;">C. <input type="checkbox"/> VERIFICATION OF ARREARS AND PROVISION OF CALCULATIONS</p>	<p>2. <input type="checkbox"/> ESTABLISHMENT OF PATERNITY (URESА)</p> <p>3. <input type="checkbox"/> ESTABLISHMENT OF ORDER (URESА) FOR:</p> <p style="margin-left: 20px;">A. <input type="checkbox"/> CHILD SUPPORT      D. <input type="checkbox"/> MEDICAL COVERAGE</p> <p style="margin-left: 20px;">B. <input type="checkbox"/> SPOUSAL SUPPORT (NON IV-D ONLY)      E. <input type="checkbox"/> OTHER COSTS (E.G., DELIVERY, OTHER MEDICAL, GENETIC TESTING COSTS, ATTORNEYS' FEES)</p> <p style="margin-left: 20px;">C. <input type="checkbox"/> UNREIMBURSED PUBLIC ASSISTANCE (IN IV-D CASES, THE AMOUNT MUST BE REDUCED TO A CHILD SUPPORT JUDGMENT)</p>
<p>4. <input type="checkbox"/> MODIFICATION OF EXISTING RESPONDING STATE ORDER (URESА)</p> <p>5. <input type="checkbox"/> INCOME WITHHOLDING</p> <p>6. <input type="checkbox"/> COLLECTION OF ARREARS (URESА OR UEFJA)</p>		

**II. CASE SUMMARY (BACKGROUND OF THIS MATTER)**

DATE OF SUPPORT ORDER	STATE & COUNTY ISSUING ORDER	DATE AND TYPE OF LAST COURT/ADMINISTRATIVE ACTION	COURT CASE NO.
SUPPORT AMOUNT/FREQUENCY	DATE OF LAST PAYMENT (Month, Day, Yr.)	AMOUNT OF ARREARS	PERIOD OF COMPUTATION FROM      THRU
\$		\$	

OTHER BRIEF SUMMARY OF REQUEST:

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**III. 1. ABSENT PARENT INFORMATION**

FULL NAME AND ALIASES (First Name, MI, Last Name)	ADDRESS (Street, City, State, Zip)	EMPLOYER (NAME) AND ADDRESS (Street, City, State, Zip)
HOME PHONE (Include Area Code)	WORK PHONE (Include Area Code)	DATE AND PLACE OF BIRTH      SEX      SOCIAL SECURITY NO.

Form FSA - 200
OMB NO. 0970-0085
CHILD SUPPORT ENFORCEMENT TRANSMITTAL  
PAGE 1 OF 2

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# Questions Asked of Offices Responding to Our Survey Concerning 12 Factors That Might Contribute to Time It Takes to Obtain Wage Withholding

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1. Amount of time it takes your central registry to get a case to you.
2. The type of withholding procedure most often used in your jurisdiction.
3. Missing or inaccurate absent parent address or employer information.
4. Caseworkers' familiarity with interstate withholding procedures.
5. Size of caseworkers' caseloads in your locality.
6. The court's willingness to hold hearings for reasons other than mistakes of fact.
7. Amount of time it takes to get a hearing.
8. Your court's refusal to accept other states' child support orders as their own.
9. The extent to which the withholding process is automated
10. Absent parents who are self-employed.
11. Absent parents who leave the employer before the order can be served.
12. Some other factors.

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# Major Contributors to This Briefing Report

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# Related GAO Products

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Interstate Child Support: Mothers Report Less Support From Out-of- State Fathers (GAO/HRD-92-39-FS, Jan. 9, 1992).

Interstate Child Support Enforcement: Computer Network Contract Not Ready to Be Awarded (GAO/IMTEC-92-8, Oct. 23, 1991).

Child Support Enforcement: A Framework for Evaluating Costs, Benefits, and Effects (GAO/FEMD-91-6, Mar. 5, 1991).

Children's Issues: A Decade of GAO Reports and Recent Activities (GAO/HRD-90-162, Sept. 21, 1990).

Child Support Enforcement: More States Reporting Debt to Credit Bureaus to Spur Collections (GAO/HRD-90-113, July 31, 1990).

Interstate Child Support: Better Information Needed on Absent Parents for Case Pursuit (GAO/HRD-90-41, May 24, 1990).

Child Support: State Progress in Developing Automated Enforcement Systems (GAO/HRD-89-10FS, Feb. 10, 1989).

Interstate Child Support: Case Data Limitations, Enforcement Problems, Views on Improvements Needed (GAO/HRD-89-25, Jan. 27, 1989).

Child Support: Need to Improve Efforts to Identify Fathers and Obtain Support Orders (GAO/HRD-87-37, Apr. 30, 1987).

Child Support: States' Progress in Implementing the 1984 Amendments (GAO/HRD-87-11, Oct. 3, 1986).

Child Support Collection Efforts for Non-AFDC Families (GAO/HRD-85- 3, Oct. 30, 1984).

U.S. Child Support: Needed Efforts Underway to Increase Collections From Absent Parents (GAO/HRD-85-5, Oct. 30, 1984).

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