

Department of Health and Human Services

**OFFICE OF
INSPECTOR GENERAL**

CHILD SUPPORT AND THE MILITARY



JUNE 1993 OEI-07-90-02250

EXECUTIVE SUMMARY

PURPOSE

To determine what barriers exist in the collection of child support payments from absent parents in the U.S. military service.

BACKGROUND

A 1989 Management Advisory Report, A-12-89-00154, issued by the Office of Audit Services (OAS) identified 42,000 military personnel in arrears on their child support payments. These payments totalled over \$176 million. The OAS identified these military cases through a match of the 1989 Office of Child Support Enforcement (OCSE) tax intercept file and military personnel data. About 64 percent of the payments were related to support for Aid to Families with Dependent Children (AFDC).

Persons serving in the U.S. military services are expected to pay their financial obligations in a timely manner, including the support of dependent children. The U.S. Department of Army regulations, 32 CFR Part 584.2, requires soldiers to provide financial support to family members, obey court orders, and comply with all court imposed obligations. More specifically, Army Regulation 608-99, Chapter 2-1a, "requires soldiers to provide financial support to family members and to obey court orders on child custody." The Navy, Air Force and Marines have similar regulations which also require their members to pay their financial obligations, including dependent support.

We selected eight States and 360 cases for inclusion in this inspection, using a two-stage stratified cluster sample. States were then selected in the first stage using a stratified random sample. Forty-five cases were selected in each State with random sampling for a total of 360 cases.

In addition, we interviewed Child Support Enforcement (CSE) caseworkers in two local CSE offices and at a military installation in each of the eight States. We also interviewed legal staff in each of the four Defense Finance and Accounting Service Centers. Our preliminary findings were discussed with the Department of Defense and their comments are incorporated in the report.

FINDINGS

States do not collect child support payments in more than half of the sample military cases. Projected national savings to the AFDC and Medicaid programs, if courts orders for child support were established and/or enforced in these cases, totals \$54.1 million.

Locating absent parents is the greatest barrier. The transient nature of military assignments and the fact that military personnel are often stationed at installations for short periods of time often complicates the location of absent parents. That, coupled with difficulties in obtaining Social Security numbers for absent parents, often makes locating absent parents in the military virtually impossible.

The CSE staff have not been properly trained to handle military cases. The CSE staff are unfamiliar with military policies and procedures which can become "red tape". A handbook issued by the Administration for Children and Families (ACF) entitled "Child Support Enforcement in the Military" was effective but not widely distributed to CSE caseworkers and staff.

Military Finance Centers identified reasons for delaying the processing of wage withholding orders. The Defense Finance and Accounting personnel interviewed indicated that the delay in processing wage withholding orders is often the result of handling many orders more than once, and that many orders are returned to CSE agencies because they lack the proper documents and/or information required for processing. The lack of standardized forms for submission of wage withholding orders also delays processing which is consistent with a finding in a previous Office of Inspector General (OIG) report.

RECOMMENDATIONS

1. The ACF, Office of Child Support Enforcement should:
 - a. provide technical support to State CSE offices to improve Social Security number identification;
 - b. evaluate the usefulness of information available through the Federal Parent Locator Service, and provide necessary assistance to local CSE offices searching for military absent parent Social Security numbers;
 - c. continue to promote the "Child Support Enforcement in the Military" handbook; and
 - d. establish and require the use of a standard form and a checklist for submission of wage withholding requests to the Defense Finance and Accounting Service Centers.
2. The ACF and the Social Security Administration (SSA) should collaborate to develop a better mechanism to assist CSE staff in obtaining Social Security numbers for absent parents. In doing so, it is essential that safeguards remain in place to protect individual privacy and the integrity of the Social Security system.

COMMENTS

We received comments on the draft report from ACF, SSA, and the Assistant Secretary for Planning and Evaluation. They concurred with our recommendations. ACF identified several actions that they have taken. However, we feel continued actions on each of our recommendations are warranted. The full text of their comments are included in Appendix D.

TABLE OF CONTENTS

	Page
EXECUTIVE SUMMARY	i
INTRODUCTION	1
FINDINGS	3
Uncollected support payments	3
Barriers to collecting child support in military cases	5
CSE staff training	7
Military finance centers	7
RECOMMENDATIONS	9
APPENDIXES	
A. Projected Case Characteristics	A-1
B. State Level Data	B-1
C. Projected Program Savings	C-1
D. Agency Comments	D-1

INTRODUCTION

PURPOSE

The purpose of this study is to determine what barriers exist in the collection of child support payments from absent parents in the U.S. military service.

BACKGROUND

A 1989 Management Advisory Report, A-12-89-00154, issued by the Office of Audit Services (OAS) identified 42,000 military personnel in arrears on their child support payments. These payments totalled over \$176 million. These military cases were identified through a match of the 1989 Office of Child Support Enforcement (OCSE) tax intercept file and military personnel data. About 64 percent of the payments were related to support for Aid to Families with Dependent Children (AFDC).

Persons serving in the U.S. military services are expected to pay their financial obligations in a timely manner, including the support of dependent children. The U.S. Department of Army regulations, 32 CFR Part 584.2, requires soldiers to provide financial support to family members, obey court orders, and comply with all court imposed obligations. More specifically, Army Regulation 608-99, Chapter 2-1a, "requires soldiers to provide financial support to family members and to obey court orders on child custody." The Navy, Air Force and Marines have similar regulations which also require their members to pay their financial obligations, including dependent support.

METHODOLOGY

We selected eight States and 360 cases for inclusion in this inspection, using a two-stage stratified cluster sample. States were then selected in the first stage using a stratified random sample. Forty-five cases were selected in each State with random sampling for a total of 360 cases.

The sample frame for the first stage consisted of the 50 States. These States were rank ordered and categorized into quartiles based on the 1990 average annual AFDC caseload information listed on the OCSE-56 form. Three States were randomly selected from each of the four strata - two sample States plus one alternate. Three of the initially selected sample States were unable to provide us with a list of AFDC cases which included absent parent information. We replaced these three States with the selected alternate States for the respective quartile. The eight States selected for inclusion in this study were Arkansas, Georgia, Illinois, Massachusetts, New Jersey, Nevada, Oklahoma and South Dakota.

Using the lists provided by the State Child Support Enforcement (CSE) agencies, we identified the AFDC child support cases in which a branch of military service was

listed as the absent parent's place of employment. Then we randomly selected 45 cases from the military cases identified in each State, for a total of 360 cases. We reviewed 275 of these cases. We did not review the other 85 cases based on our determinations that the absent parents were not in the military, had been discharged from military service, paternity blood tests were negative, or the AFDC portion of the case had been closed.

Through our review of the sample AFDC case files, we obtained the information necessary to determine if the absent parents had been located, if paternity had been established, if court orders had been issued, and whether or not child support payments were being collected. We were also able to determine the extent of contacts between CSE staff and military personnel, and the success of the contacts.

In addition to our review of the sample cases, we interviewed CSE caseworkers and military staff in each of the selected States, and each of the Defense Finance and Accounting Service Centers. We interviewed CSE caseworkers in two local CSE offices in each of the eight States. One CSE office in each State was located within 50 miles of a military installation, and the other located more than 50 miles from any military installation.

We interviewed military personnel at one military installation in each of the sample States. The selection of CSE offices and military installations to be included in our sample was conducted with the assistance of both State CSE and Department of Defense (DOD) personnel. In total, four Army, three Air Force, and one Naval installation were included in the sample. The military personnel interviewed varied from installation to installation, and included staff from the Inspector General's office, the Family Support Center, Personnel, Payroll, Accounting and Finance, Legal Assistance, and Chaplains. We also conducted interviews with legal staff in each of the four Defense Finance and Accounting Service Centers.

Our preliminary findings were discussed with DOD and they provided comments, advice, and input regarding sampling, design, and issues which were incorporated into the report.

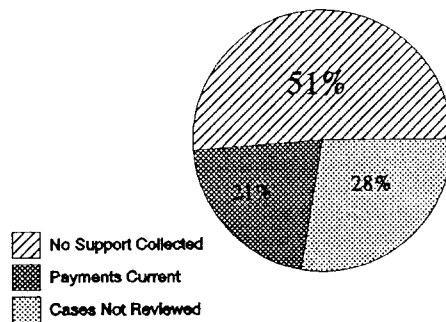
FINDINGS

1. States do not collect child support payments in more than half of the sample military cases.

No child support payments are being collected in 143 of the 275 sample cases reviewed. Based on a weighted distribution, these cases account for 51 percent of the 360 included in our sample. Child support orders had been established but no current payments were being made in 45 of the cases (12.7 weighted percentage), causing arrearages to build. No support orders had been established in 98 other cases (37.8 weighted percentage), and therefore no child support payments were being made. The chart below shows the weighted distribution of the 360 sample cases. (See Appendix A for more details.)

No Child Support Collected

(51 Percent - Weighted Distribution of 360 Cases)



Projected national savings to the AFDC and Medicaid programs, if court orders for child support were established and/or enforced in these cases, total \$54.1 million. (See Appendix C for more details.)

No current child support payments were being made in 45 of the sample cases where court orders for support existed.

The 45 sample cases had been open from 7 to 256 months, averaging 51.7 months. The recorded number of months since the absent parent had made court ordered child support ranged from 1 to 43 months, averaging 12 months. The average recorded arrearage for these cases was \$4,590. Recorded arrearages totalled \$179,030. Projected nationally, the number of cases where no current child support payments were being made totals 5,114. Savings to

the AFDC program, if existing court orders for child support were enforced in these 45 cases, projects to \$15.5 million annually.

Of the 45 sample cases in which absent parents were delinquent in their court ordered child support, only 6 had orders containing immediate wage withholding. The absence of immediate wage withholding makes the collection of delinquent payments difficult. Because immediate wage withholding was not included in these support orders, the CSE agency must encourage absent parents to establish voluntary allotments, process garnishments or serve them with delinquency notices to establish involuntary allotments. Voluntary allotments must be established by the absent parent and can also be canceled by the absent parent at any time. Involuntary allotments require delinquencies of more than 2 months and are not honored by the military unless the order specifies a monthly amount to be applied to the arrearage.

No court order for child support had been established in 98 of the sample cases.

Of the 98 sample cases in which no support orders had been established, CSE staff had been unable to locate the absent parent in 47 cases. In the other 51 cases, the absent parents had been located but no court order established for a variety of reasons, including the fact that the absent parents were out of the country or on a ship, paternity blood tests were pending, or CSE staff made no military contacts. The chart below provides more detailed information regarding these cases.

**Child Support Cases in which
No Support Order had been Established**

Case Status	Absent Parent Not Located	Absent Parent Located
No absent parent Social Security Number	37	
CSE staff made no military contacts		12
Absent parent abroad or on a ship		11
Paternity blood tests were pending		7
No activity on case since absent parent located		6
Military Uncooperative (Due to War time restrictions of Desert Storm)	4	
Custodial parent/client uncooperative		3
CSE contacts current	2	3
CSE made inappropriate contacts	2	3
Insufficient information to determine status		3
Absent parent was uncooperative		1
CSE awaiting military response	1	1
Absent parent discharged by time of contact		1
Military had no record of absent parent	<u>1</u>	—
Totals	47	51

On the average these cases had been open 27 months, over 2 years. The actual time they had been open ranged from 3 to 145 months. Projected nationally, these cases total 15,222. The projected annual savings to the AFDC program is \$22,246,649 if court orders for child support were established and enforced in these cases.

Medical insurance is available to cover dependents currently receiving medical assistance through the Medicaid program.

Medical insurance is available to all military personnel and their dependents. In addition to AFDC program savings, the establishment and enforcement of medical support obligations for the projected number of cases in which no court orders had been established would save the Medicaid program \$12,285,523 annually. We calculated this savings amount by applying the average of \$807.09 in medical assistance provided to AFDC children by the Medicaid program to the projected number of these cases, and multiplying it by 12 months. We used the Health Care Financing Administration Form 2080 to determine the average monthly amount. We then applied the \$807 to the 98 cases in which no court orders for child support had been established.

The Medicaid program would save an additional \$4,127,458 annually if court orders for medical support were enforced in the projected number of cases where court orders already exist. The combined Medicaid program savings for both types of cases totals \$16,412,981 annually.

We recognize the Federal government's liability in the Civilian Health and Medical Program of the Uniformed Services (CHAMPUS) and Medicaid and that obtaining health care coverage for military personnel dependents through CHAMPUS would not necessarily lead to a reduction in overall Federal health care expenditures.

2. ***Locating absent parents is the greatest barrier.***

The CSE staff were unable to locate the absent parents in 47 of the sample cases reviewed, as shown in the chart on page 4. These 47 cases account for 48 percent of the 98 cases in which no support order had been established. We estimate that out of the population studied 23.5 percent of the absent parents would be difficult to locate.

The transient nature of military assignments and the fact that military personnel are often stationed at installations for short periods of time often complicates the location of absent parents. The CSE staff in 13 of the 16 CSE offices visited stated they had encountered problems in locating absent parents in the military. The staff in 6 of the 13 offices named location of the absent parents as "the greatest barrier" to child support enforcement and collection in military cases.

As shown in the chart on page 4, cases in which the absent parents' Social Security numbers are unknown account for 38 percent (37 of 98) of the cases in which no court orders have been established. Since the military uses Social Security numbers to identify military personnel, they are imperative in the identification and location of absent parents in the military, as well as in processing wage withholdings for court ordered support. Without a Social Security number, locating an absent parent in the military is virtually impossible.

The CSE staff we interviewed indicated few resources are available for obtaining unknown Social Security numbers. They have been directed to use the Federal Parent Locator Service (FPLS) to search for unknown absent parent Social Security numbers. Likewise, Social Security Administration staff have been directed to refer CSE staff searching for absent parent Social Security numbers to the FPLS, except in emergency situations.

However, the CSE staff interviewed indicated that since little absent parent information is available to them in many of these cases, they often consider the FPLS an unproductive source for obtaining a Social Security number. To obtain a Social Security number through the FPLS, the CSE agency must accurately complete at least three of a number of specified data fields. These fields include the absent parent's city of birth, State or country of birth, first name, middle initial, last name, date of birth, sex, mother's first name, mother's middle initial, or mother's maiden name. The information included in the completed fields must be letter perfect to match with Social Security Administration information available through the FPLS. Staff in one CSE office said they had "never gotten a Social Security number through the FPLS." Others indicated that obtaining a Social Security number through the FPLS is very unlikely.

Additionally, CSE staff are often unfamiliar with other locate sources available to them if the Social Security number is known. One such source is the Worldwide Military Locator Services (WMLS). Each branch of military service has established a WMLS to provide military addresses for military personnel.

The WMLS information is provided to State CSE agencies at no charge. However, CSE staff in four of the eight offices visited said they seldom contacted a WMLS, and one said they had never contacted a WMLS. In the 45 cases where CSE staff had contacted a WMLS for locator information, the absent parents' military addresses were provided in all but four instances. In three of these four cases, the military refused to provide the information requested based on the privacy required by Operation Desert Storm. In the other case, the military refused to provide the information requested by the CSE agency, stating that the "records requested are protected from disclosure under the privacy act."

Another military locator source available to CSE staff is base locators. Most military installations have a base locator, who can provide the ranks and military addresses of military personnel assigned to that installation. A base locator can also provide CSE staff with the next duty station, in the event that the person in question has been transferred. Even though CSE staff in 11 of the 16 offices visited said they sometimes or almost always used base locators, staff in 3 offices said they seldom or never contacted base locators.

Even though base locators often serve as an excellent source of locating absent parents, CSE staff should be cautioned in their contacts with them. Military personnel at seven of the eight installations visited indicated they do not forward requests for the location of absent parents to the WMLS in instances where he/she is not, or has not recently been, stationed at their facility. Therefore, CSE staff should proceed with contacts to the WMLS if contacts with a base locator are unsuccessful. As with the use of the WMLS, base locators also require the absent parent's Social Security number.

3. *The CSE staff have not been properly trained to handle military cases.*

The CSE staff have not been properly trained to handle military cases. They are unfamiliar with military policies and procedures which can become "red tape" when not understood. The staff interviewed expressed concern with the "layers" they have to go through in obtaining information about absent parents in the military. One person interviewed said they "may write off military cases because it is so hard to get the absent parents served." Others said they "have limited information regarding the military and need training," and that they "need training sessions with military personnel who have direct knowledge of how the system works."

The handbook issued by the ACF, Office of Child Support Enforcement, entitled "Child Support Enforcement in the Military" was effective, but not widely available. The Office of Child Support Enforcement issued the handbook in June of 1991 to states and local child support enforcement offices, but only 8 of the 16 local CSE offices we visited had a copy of the handbook at the time of our interviews, over 6 months later. In two of these eight offices the handbook was available in the office, but it had not been distributed to the staff. In these two instances, only one person on the CSE staff had seen a copy of the handbook. The CSE staff that had copies of the handbook spoke highly of it and said they found it helpful.

4. *Military Finance Centers identified reasons for delaying the processing of wage withholding orders.*

The CSE staff interviewed indicated that processing wage withholding in military cases takes longer than non-military cases. They said military wage

withholdings take from 2 to 4 weeks longer than civilian cases, and that it is 2 to 3 months before they see any payments.

The Defense Finance and Accounting personnel interviewed indicated the delay in processing CSE wage withholdings is often the result of the office handling many wage withholding orders more than once. They said that many wage withholding orders are returned to CSE agencies because they lack the proper documents and/or information required for processing. Among the reasons listed for returning wage withholding orders to CSE agencies were the lack of:

- a certified copy of the support order;
- a certified copy of the arrearage support order;
- the absent parent's full name and Social Security number;
- the full name and address to whom payment should be made; or
- legible copies of documents.

The Defense Finance and Accounting personnel also indicated that the lack of standard forms for the submission of withholding orders delays the processing of wage withholding orders, which in turn delays payment. The wage withholding forms they receive vary by State, and many times from one jurisdiction to another within a State. They indicated that standardization of wage withholding documents would speed their document review time, leave less room for errors, and could serve as a checklist for CSE staff to use in preparing wage withholding packages. This finding is consistent with a previous Office of Inspector General (OIG) report which found that formats and language in court order forms are not standardized among State CSE agencies. The report recommended requiring all jurisdictions to use standardized forms when issuing legal processes for child support to employers.¹

¹"An Employer Perspective: Fragmentation of State Practices Impair Ability of Employers to Effectively Implement Wage Withholding Process," A-12-91-00016.

RECOMMENDATIONS

1. The ACF, Office of Child Support Enforcement should:
 - a. provide technical support to State CSE offices to improve Social Security number identification;
 - b. evaluate the usefulness of information available through the Federal Parent Locator Service, and provide necessary assistance to local CSE offices searching for military absent parent Social Security numbers;
 - c. continue to promote the "Child Support Enforcement in the Military" handbook; and
 - d. establish and require the use of a standard form and a checklist for submission of wage withholding requests to the Defense Finance and Accounting Service Centers.

2. The ACF and the Social Security Administration should collaborate to develop a better mechanism to assist CSE staff in obtaining Social Security numbers for absent parents. In doing so, it is essential that safeguards remain in place to protect individual privacy and the integrity of the Social Security system.

AGENCY COMMENTS AND OIG RESPONSE

We received comments on our draft report from ACF, the Assistant Secretary for Planning and Evaluation (ASPE), and SSA. The full text of their comments are included in Appendix D.

The ACF concurred with our recommendations, agreeing that processes for collecting child support payments from absent parents in the military need to be improved, particularly in locating the absent parents. They noted several past and future initiatives to enhance efforts to locate and establish support requirements for absent parents in the military. However, we believe continued actions on each of our recommendations are warranted.

The ACF suggested that we incorporate data collection instruments into the report. For reasons of efficiency and clarity, we generally do not do this. However, we are more than happy to provide a copy of the instruments to ACF.

The ASPE agrees that OCSE and child support enforcement agencies could undertake additional administrative actions to improve establishing and enforcing child support in cases where the absent parent is in the military.

However, ASPE raised several points.

The ASPE agrees that military-provided insurance could potentially reduce Medicaid costs but pointed out that would not reduce Federal health care expenditures. The medical bills would be paid by CHAMPUS, the Federal program which pays for health care of military personnel and their dependents. We agree and have made this point on page 5 of our report.

The ASPE mentions that AFDC (and Medicaid) program savings are computed as if all of the absent parents could be located, so the potential program savings should reflect a more realistic, less than 100 percent, locate rate. We agree that our estimates are premised on the 100 percent locate rate and that this is not likely to be achieved. However, we believe that this should be the goal and that a locate rate approaching 100 percent is feasible. Furthermore, we have no way to accurately predict any other rate.

The ASPE feels that some of the problems related to wage-withholding stem from inconsistencies between the Federal law permitting garnishment in the military (passed in 1982) and the general child support wage withholding statutes (passed in 1984 and 1988) and that it may be impossible to eliminate confusion between military personnel and CSE until the 1982 law is amended and/or military regulations are brought into conformance with subsequent legislation. However, we did not encounter this problem in our study.

Regarding developing a better mechanism for obtaining Social Security numbers, ASPE indicated that safeguards have to remain in place to protect individual privacy and the integrity of the Social Security system. We agree and have included such references in the report.

The SSA agreed that it should collaborate with ACF/OCSE to develop a better mechanism to obtain Social Security numbers for absent parents.

The SSA also raised several questions regarding our statistical calculations. We selected our sample using stratified two-stage cluster design. The data from the eight States were assigned weights appropriate for the design.

The SSA is correct that States having a large number of child support cases in which a military branch was listed as the absent parent's place of employment had a higher percentage of cases where no child support is being collected than the small enrollment States. We include State level data in Appendix B. SSA also pointed out a discrepancy in the precision level of one item on our table of projected case characteristics. We made the corrections.

APPENDIX A

Projected Case Characteristics

Distribution with respect to whether child support payments were delinquent.

	Delinquent Cases	Non-Delinquent Cases	Dropped out of the Sample
Estimate	12.7%	59%	28.3%
90% Confidence Interval	9.7%-15.7%	54%-64%	23.3%-33.3%
Relative Precision	23.6%	8.3%	17.7%

Distribution with respect to whether or not a support order was established.

	No Support Order Established	Support Order Established	Dropped Out of the Sample
Estimate	37.8%	33.9%	28.3%
90% Confidence Interval	23%-52.6%	16.5%-51.3%	23.3%-33.3%
Relative Precision	39%	51.3%	17.7%

Distribution with respect to whether or not the absent parent could be located.

	Unable to Locate	Located	Dropped Out of the Sample
Estimate	23.5%	48.2%	28.3%
90% Confidence Interval	20.5%-26.5%	38.7%-57.7%	23.3%-33.3%
Relative Precision	12.8%	19.7%	17.7%

Distribution with respect to whether or not the case was a paternity case.

	Paternity Case	Non-Paternity Case	Dropped out of the Sample
Estimate	55.2%	16.5%	28.3%
90% Confidence Interval	45%-65.4%	7%-26%	23.3%-33.3%
Relative Precision	18.4%	57.6%	17.7%

APPENDIX B

State Level Case Data

	Cases in Universe	Cases in Sample	Cases Reviewed	98 Cases No Order Established	45 Cases No Payment
Strata 1					
GA	4,068	45	32	21	6
IL	664	45	29	1	5
Strata 2					
MA	90	45	31	2	6
NJ	708	45	33	9	6
Strata 3					
AR	414	45	35	20	4
OK	127	45	40	26	3
Strata 4					
NV	178	45	33	18	6
SD	66	45	42	1	9
Total	6,315	360	275	98	45

APPENDIX C

Projected Program Savings

(dollar amounts in millions)

	Order Established/ Payments Delinquent	No Order Established/ No Payments	Total Number of Cases Receiving No Payment
Number of Cases in Sample	45	98	143
Number of Case Projected Annually	5,114	15,222	20,336
AFDC Program Savings	\$15.5	\$22.2	\$37.7
Medicaid Program Savings	\$ 4.1	\$12.3	\$16.4
Total	\$19.6	\$34.5	\$54.1

Confidence Intervals and Precision

(dollar amounts in millions)

	Order Established/ Payments Delinquent (45 cases)		No Order Established/ No Payments (98 Cases)	
	AFDC	Medicaid	AFDC	Medicaid
Estimate	\$15.5	\$ 4.1	\$22.2	\$12.3
90% Confidence Interval	\$10.9 - \$19.9	\$3.1 - \$5.1	\$13.2-\$31.2	\$7.5 - \$17.1
Precision	29%	23.6%	39%	39%

APPENDIX D

Agency Comments

We received comments on our draft report from the Administration for Children and Families (ACF), the Assistant Secretary for Planning and Evaluation (ASPE), and the Social Security Administration (SSA). Their responses follow.



DEPARTMENT OF HEALTH AND HUMAN SERVICES
ADMINISTRATION FOR CHILDREN AND FAMILIE
370 L'Enfant Promenade, S.W.
Washington, D.C. 20447

Date: April 1, 1993

To: Bryan B. Mitchell
Principal Deputy Inspector General

From: *Larry Love*
Larry Love
Acting Assistant Secretary for
Children and Families

Subject: Comments on OIG Draft Report "Child Support and the
Military" OEI-07-90-02250

We agree that there is a need to improve the processes,
particularly location, to remove barriers that exist in the
collection of child support payments from absent parents in the
military.

The report finds that: 1) States did not collect child support
payments in more than half of the sample of military cases; 2)
locating absent parents is the greatest barrier to the collection
of support payments; 3) Child Support Enforcement (CSE) staff
have not been properly trained in handling military cases; and 4)
military finance centers identified reasons for delaying the
processing of wage withholding.

The report indicates that OIG staff interviewed CSE staff and
military personnel in each of the eight States. However, the
report does not mention the process for identifying and selecting
the persons to be interviewed nor does it include the questions
posed. We suggest that the data collection instruments be
incorporated as exhibits to the report.

Comments on the specific OIG recommendations follow:

OIG Recommendation:

- 1.a. The ACF, Office of Child Support Enforcement should provide
technical support to State CSE offices to improve social
security number identification:

ACF Comment:

We concur.

In September 1991, at the First Annual National Child
Support Training Workshop, the Office of Child Support
Enforcement (OCSE) conducted a track on location training
for 72 participants (mainly State child support trainers)
from 28 States. Improvement of social security number (SSN)
identification was included. Each of the participants

and the non-attending states were provided with a sample curriculum for location training. Our follow-up to the conference indicates that several States have conducted location training using this curriculum.

OCSE staff have conducted on-site location training (with SSN identification as an integral part of the training) in Arizona, Indiana, Michigan, Prince George's County, and Philadelphia. OCSE staff also presented sessions on location at State child support conferences in Alabama, California, and Florida. Training workshops on the location function were also conducted at the two largest national training conferences: the National Child Support Enforcement Association's and the Eastern Regional Child Support Association's Annual Training Conferences.

In 1992, OCSE developed a program review protocol which was issued in December to all Regional Offices for use in conducting program reviews of the location function (and SSN identification) with follow-up technical assistance where appropriate.

OCSE has recently notified State CSE offices of their ability to submit through the Federal CSE office to the Social Security Administration (SSA) SSN's for verification in SSA's Enumeration Verification System (EVS). There are two systems offered by the SSA that the States may use. The first is "System 212" which will provide a State with multiple SSN's for an individual who has been legally issued more than one SSN. To date, System 212 has identified 14,000 multiple SSN's. The second is "System 220" which will provide a corrected SSN in cases where the State has made a transposition or slight error in the SSN that they currently have for that individual. To date, System 220 has provided 30,000 corrected SSN's.

OIG Recommendation:

- 1.b. The ACF, Office of Child Support Enforcement should evaluate the usefulness of information available through the Federal Parent Locator Service (FPLS), and provide necessary assistance to local CSE offices searching for military absent parent social security numbers.

ACF Comment:

We concur in that we are constantly evaluating the usefulness of the information available through the FPLS. However, the usefulness of the location information is

dependent on several factors including the currency of the data received from other Federal agencies and how successful states are in following up on the information. Most Federal agency data bases that the FPLS accesses are updated at least annually.

The FPLS receives SSN information from the Social Security Administration and address and employer information from the Internal Revenue Service, the National Personnel Records Center, the Department of Defense, the Department of Veterans Affairs, the Selective Service System and the State Employment Security Agencies. If SSA records indicate the person is in the military, the FPLS will automatically send the case to DOD.

On an ongoing basis, OCSE provides technical assistance to local child support enforcement offices in the identification of SSN's, from automated matches with IRS and SSA, for all absent parents including those in the military.

OIG Recommendation:

- 1.c. The ACF, Office of Child Support Enforcement should continue to promote the "Child Support Enforcement in the Military" handbook.

ACF Comment:

We concur.

With two inhouse printings, OCSE has distributed the "Child Support Enforcement in the Military" handbook to all State and local child support offices and has made copies available to military family service centers, and to worldwide offices of the American Red Cross. This publication is included in OCSE's list of available publications. In an effort to further promote the handbook, OCSE arranged in 1992 for the handbook to be marketed and sold by the U.S. Government Printing Office.

OIG Recommendation:

- 1.d. The ACF, Office of Child Support Enforcement should establish and require the use of a standard form and a checklist for submission of wage withholding requests to the Defense Finance and Accounting Service Centers.

ACF Comment:

We concur.

OCSE has identified a work group to develop a standardized form for wage withholding. The work group consists of CSE staff at the Federal, Regional, State, and local level, as well as appropriate associations. The OCSE plans to submit the form to OMB for approval this fiscal year.

OIG Recommendation:

2. The ACF and the Social Security Administration should collaborate to develop a better mechanism to assist CSE staff in obtaining social security numbers for absent parents.

ACF Comment:

We concur.

Through SSA, the FPLS can identify SSN's, addresses, and employer information. Additionally, as previously indicated, SSN's can be verified through the SSA's Enumeration Verification System.



Washington, D.C. 20201

FEB 12 1993

TO: Bryan B. Mitchell
Principal Deputy Inspector General

FROM: Acting Assistant Secretary
for Planning and Evaluation

SUBJECT: OIG Draft Report: "Child Support and the Military,
OEI-07-90-02250

We have reviewed the above mentioned draft report and agree that there are additional administrative actions that OCSE and state child support enforcement agencies can undertake to improve the establishment and enforcement of child support in cases where the non-custodial parent is in the military.

However, we have several concerns about the specific findings in the report and would like to raise an additional concern about your recommendation that ACF/OCSE and SSA develop a better mechanism for obtaining Social Security numbers of non-custodial parents.

First, while we agree that whenever possible, the military non-custodial parent should provide for the health care needs of their children and that such military-provided insurance could potentially reduce Medicaid costs, the report should clearly state that obtaining such health care coverage would not lead to a reduction in federal health care expenditures. CHAMPUS, the program designed to provide health care for military personnel and their families, is 100 percent federally-financed and has a broader package of coverage than some state Medicaid programs. This would mean that the Federal Government would likely pick up more of the cost for health care under CHAMPUS than under Medicaid. In the long run, health care coverage through CHAMPUS might help some families with high health care costs, leave AFDC, because Medicaid coverage is no longer needed. However, in the short-term, there is likely to be a reduction in the federal share of Medicaid costs but an overall increase in Federal Government costs as a result of increased provision of health insurance and care through the military.

Second, while the report correctly indicates that several factors beyond the control of the CSE program make the location of some non-custodial parents in the military virtually impossible, the AFDC (and Medicaid) program savings are computed as if all of these absent parents could be located. The potential program savings should reflect the less than 100 percent locate rate that the report elsewhere indicates is realistic.

Third, the report indicates that military personnel allege that the problems in processing wage-withholding orders are mainly the result of improper handling of the CSE agency. What the report fails to mention is that some of the problems related to wage-withholding stem from inconsistencies between the federal law permitting garnishment in the military, which was passed in 1982, and the general child support wage withholding statutes passed in 1984 and 1988. The 1982 statute only permits garnishment (involuntary wage-withholding) after 2 months arrears and places other limitations on enforcement action. Under the 1988 statute, immediate withholding, without any accumulation of arrears, was mandatory in IV-D cases beginning in 1991. An example of the confusion which might result from these separate statutes is that military personnel cite as a frequently "missing" item, a certified copy of the arrearage support order. According to the 1984 law, it is not necessary to go back to court for such an order, and according to the 1988 law, it is not necessary for there to be an explicit request for wage-withholding in the initial support order. It may be impossible to clear up the confusion between military personnel and CSE staff until the 1982 law is amended and/or military regulations are brought into conformance with subsequent legislation.

Lastly, the report recommends that ACF and SSA develop a better mechanism for obtaining Social Security numbers for absent parents. While we support any collaboration which could make the system work better, we would like to point out that safeguards have to remain in place in order to protect individual privacy and the integrity of the Social Security system. Unknown SSNs can be provided only when the CSE agency, based on information from the custodial parent, can furnish several other pieces of information which are kept as part of the Social Security records. These include some combination of: the non-custodial father's legal name, his date of birth, his place of birth, and the names of his mother and father. If the custodial parent does not know any of these items, release of a SSN or a number of possible SSNs, based solely on a name match, would be irresponsible. Attempts to locate absent parents need to be balanced against the reasonable protection of the privacy of individuals within the Social Security system.

If you have any questions, please feel free to call Ann Segal, Acting Deputy Assistant Secretary for Human Services Policy (690-7148).



Gerald H. Britten



Refer to

Memorandum

Date: . MAR 24 1983

From: 
Louis D. Enoff
Acting Commissioner of Social Security

Subject: Office of Inspector General Draft Report, "Child Support and
the Military" (OEI-07-90-02250)--INFORMATION

To: Bryan B. Mitchell
Principal Deputy Inspector General

Attached is our response to the subject report. If we can be of further assistance, please let us know.

Attachment:
SSA Response

COMMENTS OF THE SOCIAL SECURITY ADMINISTRATION ON THE OFFICE OF
INSPECTOR GENERAL DRAFT REPORT, "CHILD SUPPORT AND THE MILITARY"
(OEI-07-90-02250)

Office of Inspector General (OIG) Recommendation

The Administration for Children and Families (ACF) and the Social Security Administration (SSA) should collaborate to develop a better mechanism to assist the Office of Child Support Enforcement (OCSE) staff in obtaining Social Security numbers (SSN) for absent parents.

SSA Response

We agree and are currently working with OCSE to develop a better mechanism to obtain SSNs for absent parents. The Federal Parent Locator Service (FPLS) within OCSE is conducting a study to see if a different SSA system could provide SSNs to them. The Alpha Search routines of the Enumeration Verification System may be a better mechanism for locating SSNs for these cases, since they would not require as many data elements as the FPLS system.

On January 6, 1993, representatives from SSA met with OCSE to explore ways to better serve OCSE in obtaining SSNs for absent parents. A number of options for enhancing this process through data exchange and other methods will be shared with OCSE in the near future.

Other Matters

There appears to be a problem on page 3 of the report with OIG's estimate that 51 percent of the 360 cases reviewed showed no child support payments being made. Either an error was made in the calculation or States that have a large number of child support cases in which a branch of military service was listed as the absent parent's place of employment have a higher percentage of cases where no child support is being collected than do the small enrollment States. The pie chart on page 3 shows that 143 of 275 sample cases represented a weighted percentage of 51 percent and 132 of 275 represented a weighted percentage of 21 percent. If this is so, it would be beneficial to show State level data for the eight States or, alternatively, quartile data, so that the reader of the report would be aware of this disparity in results for large enrollment States as compared to small enrollment States.

Additionally, on page A-1 of the appendix, the relative precision number under the Unable to Locate column for absent parent should be 12.8 percent rather than 45.5 percent. Also, the confidence intervals for whether or not a support order was established seem to be wider than one would expect.