AUTOMATED SYSTEMS FOR

CHILD SUPPORT ENFORCEMENT:

A GUIDE FOR ENHANCING FINANCIAL INSTITUTION DATA MATCH (FIDM) AUTOMATION

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U. S. DEPARTMENT OF HEALTH AND HUMAN SERVICES

Administration for Children and Families
Office of Child Support Enforcement

PREFACE

The Administration for Children and Families (ACF) Office of Child Support Enforcement (OCSE) developed this *Guide for Enhancing Financial Institution Data Match (FIDM) Automation* to support States in increasing the efficiency of the financial institution (FI) collections in their Child Support Enforcement (CSE) systems.

The audience for this Guide includes State CSE technical, policy, and program operations staff and their contractors, and Federal OCSE technical assistance staff.

Comments were requested and received from States and were incorporated wherever appropriate in this Guide. ACF welcomes additional comments and suggestions from those using this Guide. Comments may be sent to:

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Chapter I: ENHANCING CHILD SUPPORT ENFORCEMENT SYSTEM PERFORMANCE

This chapter presents background or general information pertaining to the collaborative Federal and State initiative to enhance the process and level of automation in State Child Support Enforcement (CSE) systems, thereby reducing arrearages, through Financial Institution Data Match (FIDM). Section A describes the Office of Child Support Enforcement (OCSE) Level of Automation Technical Assistance initiative. Section B discusses technical assistance available from OCSE, to enhance FIDM automation. Section C provides some program background discussion. Section D provides information on FIDM functional requirements. Section E provides an overview of the remainder of the guide.

A. *Level of Automation Technical Assistance*

The Department of Health and Human Services, Administration for Children and Families (ACF), provides national leadership and direction in planning, managing, and coordinating the nationwide administration and financing of a broad range of comprehensive and supportive programs for children and families, including Child Support Enforcement.

State and local agencies carry out the Child Support Enforcement program. ACF retains the responsibility to monitor and evaluate programs to ensure that they are being operated as intended by law and regulation and that the expenditure of Federal funds is made in accordance with Federal regulation.

Level of Automation Technical Assistance is an OCSE initiative to encourage and support States in enhancing the functionality and efficiency of their CSE systems. It serves as a mechanism for OCSE to provide direction, and facilitate knowledge sharing among States, regarding technically-based strategies for addressing business challenges, tested automated solutions, and promising new technologies. Most importantly, this technical assistance seeks to ensure that CSE systems effectively meet user needs, as defined in the ACF publication *Automated Systems for Child Support Enforcement: A Guide for States. Updated in IM 07-07 May 2007.* http://www.acf.hhs.gov/prorams/cse/dsts_cert_guide.html

Federal OCSE staff work in close collaboration with State CSE technical, policy, and program operations staff and together focus on improving system performance. Technical assistance subject areas are derived from OIG evaluations, CSE conferences, and State input. Regular Federal Financial Participation (FFP) at the 66 percent rate is available for enhancing the level of system automation.

OCSE provides guidance documents such as this *Guide for Enhancing Financial Institution Data Match (FIDM) Automation* to facilitate the technical assistance process. Also, States and territories may request OCSE to conduct site visits to observe the State system and interview State personnel. OCSE and State personnel discuss and document their findings

and recommendations for further State system automation. Additionally, State personnel will be encouraged to share documentation and lessons learned that OCSE can disseminate to other States.

In the future, OCSE may schedule collaborative sessions with State personnel and use this Guide to consolidate and document knowledge of their CSE system's current level of automation and to identify further opportunities for automation.

B. Technical Assistance for Enhancing FIDM Automation

Like other case management activities, the FIDM process has incredible potential to be beneficial to the CSE program and those we serve. Child support arrearage is a substantial problem for the entire country. Even as overall child support collections increase, arrearages are also increasing. However, this situation does provide opportunities. Based on the nature of FIDM, all dollars collected are arrearage-based. Additionally, an aggressive FIDM process can have collateral benefits such as settlements, locations, and re-starting of on-time payments.

FIDM is one of many target areas that OCSE is emphasizing and developing support tools to address delinquencies in child support collections. This initiative is known as *"PAID" (Project to Avoid Increasing Delinquencies).* As part of PAID, OCSE is developing different tools for States that are a compilation of early intervention, order establishment, locate, enforcement, and arrears management practices. These tools can also be used by Central and Regional Office Staff to provide Technical Assistance as well as by State staff.

Some States may ask – why FIDM freeze and seize? One answer could be the benefits of FIDM. The obvious benefit of FIDM is more collections and reduction of arrears. There are also significant benefits that may not be as obvious. One is settlements. Many delinquent obligors, once confronted with a frozen bank account, will opt to make a settlement payment. Also, a frozen bank account is a strong motivator for obligors to begin making payments to avoid having their assets frozen again. It also has the benefit of getting obligors who have been difficult to work with to be more cooperative. The bottom line is that any dollar applied to arrears is a dollar in the hands of entitled families and children.

States understand the benefits and some States may still ask: Why spend more resources to further automate FIDM? This is a good question because the potential for improvement goes beyond what many think of as FIDM – the data match. Most States have developed or are contracting for the automation of the process to match delinquent obligors with accounts held in financial institutions (FI) that have been certified by OCSE to participate. However, the potential for improvements may be outside of that "core" FIDM process. It is often said in the discipline of process improvement that "out-of-the-box" thinking is required. Many times a critical examination of processes and automation that comes before and after the core process is what yields improvement. This may be the case for FIDM. This does not mean that, for some States, enhancements

to data match will not result in improvements, but, it should not be the only area examined.

The goal of this guide is to present some ideas that States and Territories can use to examine their own FIDM process and automation. If even the smallest percentage increases in FIDM collections are achieved, there is potential to play a part in directly reducing a State's or Territory's delinquent child support.

C. *Financial Institution Data Match Background*

Federal welfare reform was designed to ensure that noncustodial parents take a fair share of the responsibility for the financial support of their children. The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), P.L. 104-193, includes numerous enforcement tools intended to increase child support collections. One of those is the FIDM Program.

FIDM Program[1]

The law required States to enter into agreements with financial institutions conducting business within the State for the purpose of conducting a quarterly data match. The data match is intended to identify financial accounts held in banks, credit unions, money-market mutual funds, etc., belonging to parents who are delinquent in the payment of their child support obligation. When a match is identified, State CSE programs may issue liens or levies (referred to in the statute as "freeze and seize" procedures) on the accounts of that delinquent obligor to collect the past-due child support. In the Child Support Performance and Incentive Act of 1998, (P.L. 105-200), Congress made it easier for multistate financial institutions (MSFIs) to match records by allowing OCSE, through the Federal Parent Locator Service, to assist States in conducting data matches with MSFIs. When matches are made, the information is sent to the States within 48 hours for placement of a lien on and seizure of all or part of the accounts identified. States are using their expedited procedures to seize the accounts and thereby force debtor noncustodial parents to meet their child support obligations.

With the introduction of FIDM, CSE agencies must conduct quarterly matches with hundreds of single-State FIs operating within their State. State agencies also must participate in matching at the Federal level with thousands of MSFIs and process tens of thousands of matches resulting in collections through account seizures. State agencies also engage in interstate processing to identify and seize accounts located in another State. In addition, they engage in outreach activities to solicit the cooperation of FIs, perform customer service to address the concerns of delinquent obligors whose access to financial assets have been disrupted, and develop automated systems to routinely process and manage large numbers of cases.

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[1] http://waysandmeans.house.gov/media/pdf/greenbook2003/

In fiscal year 2007 (4th QTR 2006 thru 3rd QTR 2007), the Multistate Financial Institution Data Match (MSFIDM) program on a quarterly basis found approximately 2.63 million matches belonging to approximately 1.38 million delinquent noncustodial parents nationwide.

D. FIDM Functional Requirements

The two sections of the *Automated Systems for Child Support Enforcement: A Guide for States*, which provide functional requirements related to FIDM freeze and seize, are provided as follows:

E-15   OBJECTIVE: The CSES or an alternative system must support procedures under which the State conducts FIDM, using automated data exchanges to the maximum extent feasible.

> Related Program Statutes and Regulations:
> 42 USC 666 (a)(17)
> Financial Data Match Specifications Handbook (OCSE DC-98-69)

Note: The State has the option of using an alternative system to conduct FIDM. If the State uses an alternative system, the State, vendor, or other governmental entity may operate it.

> **System Certifications Requirements:**
> a. The CSES or alternative system must, using standard FIDM formats, have the capability to:
> 1. Produce an electronic file of delinquent obligors (in the standard FIDM Inquiry File format[2]) to be transmitted to financial institutions (FI) electing Method Two (Matched Accounts Method);
>
>   *Note: If the FIDM processing will be done on an alternative system, then the CSES must be capable of transmitting an electronic file of delinquent obligors to that alternative system.*
>
> 2. Accept files (in the standard FIDM Account File format) from FIs electing Method One (All Accounts Method);
> 3. Perform matches for FIs electing Method One (All Accounts Method);
> 4. Accept matched files (in the standard FIDM Match File format) received from FIs electing Method Two (Matched Accounts Method) and from Multi-State FIDM (MSFIDM); and
> 5. Identify (flag) delinquent obligors for the MS-FIDM process on the Administrative Offset file.
>
> b. The CSES or the alternative system must automatically update the case record when a match occurs to include, at a minimum, the FI and the record address of the non-custodial parent.

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[2] As specified in the Financial Data Match Specifications Handbook (DC-98-69).

c. The CSES or the alternative system must have the capability to produce a hard copy report (or form such as a subpoena) for use with those FIs not participating in an automated match.

d. The CSES or the alternative system must automatically produce all documents necessary to attach an asset held by a FI or, at a minimum, prompt the caseworker to take the action.

E-12 Objective: Administrative Enforcement Interstate (AEI)

a. The system must be capable of automatically identifying cases that meet the State's criteria for matching of other State's FIs or other entities where assets may be found.

b. The system must, by electronic or other means, transmit to the assisting State or at the State's option; the requesting State may use a service provider (e.g., IDEC).

1. Amount of support under an order the payment of which is in arrears,

2. Certification that the requesting State has complied with all procedural due process requirements applicable to each case.

c. The AEI request may be entered into the assisting State's CSE system as if the case were intraState, to be matched with FI account information. This AEI request should not be considered transferred to the caseload of the assisting State.

d. The system must send AEI collections via electronic funds transfer/electronic data interchange (EFT/EDI) or, at State option, direct the FI to send the funds seized directly to the requesting State.

1. States are strongly encouraged to program the EFT/EDI NACHA endorsed FIDM codes.

e. The system must track AEI information. This information includes: number of such requests for assistance received, number of cases for which the State collected support in response to a request and the amount of such collected support. The amount of collections from AEI is reported on lines 2d and 2f on OCSE Form 34A.

E. Guide Organization

The Guide is organized to include background and foundation information in the first chapters and is intended primarily to be used as a stand-alone resource. Chapter II presents an overview of the FIDM business process and is intended to describe FIDM in several discrete steps and to engage the reader's thoughts/ideas about improving FIDM using a divide-and-conquer approach.

Chapter II also presents some overview and background material related to automation. Much of this chapter addresses the core data match process which has been the primary automation focus in many States. However, not all States are performing the match the same way. Some States have developed stand-alone systems or built FIDM into their child support system or utilize a vendor to perform the data match. These initial chapters are building blocks to Chapter III.

Chapter III presents information on improvement organized by the major FIDM processes. This information is based on best practices taken from States, research into FIDM and other enforcement processes with similar objectives, and where possible, actual data evidence.

In conjunction with this guide, please refer to Chapter IV for detailed State Profiles for those States interviewed as part of this effort.

Chapter II: FIDM PROCESS AND AUTOMATION OVERVIEW

This chapter discusses the FIDM program from a process perspective. To enhance the level of automation for FIDM, it is critical that States understand and model the business process first. There are significant opportunities for FIDM enhancements that are dependent on process improvement before automation. It has been repeatedly proven that ignoring process improvement prior to technology insertion is a prescription for poor automation.

A. Description

Armed with a foundation in Federal and State laws and regulations, States have moved to develop a set of processes that can pursue a delinquent obligor's funds from financial institutions (FI). These laws and regulations require each State, in joint cooperation with the FIs operating in that State (a brief discussion of multistate FIs is provided below), to develop and operate a data match program to identify obligors who have financial assets. The data match can be completed using either of two defined methods: the All Accounts method or the Matched accounts method. The two methods are described in this chapter.

Using one of the two methods, FIs doing business in the State provide identifying information for noncustodial parents who have certain types of accounts and owe past-due child support. This data is provided on an agreed upon schedule. When a matched record is received, the CSE agency may issue a notice of levy to the FI if the statutory criteria established by the State are met. Upon receipt of the levy, the FI places a hold on all the obligor's accounts within that FI. Child support notifies the obligor of the levy within three business days, at which time the obligor may file a motion to contest the action. This contest motion must be filed within a set period of days. In the event of a levy appeal, the CSE agency will issue a notice to the FI to continue to hold the funds until the contest is resolved. The court or administrative entity has a certain period of time to set a hearing date. Once the hearing is concluded, the CSE agency will issue a notice to the FI regarding the results. The FI will either release the accounts or remit the funds to the CSE agency.

Method One – All Accounts Method

Method One, known as the All Accounts Method, is utilized by FIs or their designated service providers to submit a file containing all open accounts. This file contains relevant information as specified by the Office of Management and Budget (OMB) and is sent to the State for matching quarterly. The file is matched against the States' records of delinquent child support obligors.

Method Two – Matched Accounts Method

Method Two, known as the Matched Accounts Method, is utilized by FIs or their designated service providers to receive a file from the State containing relevant delinquent child support obligor information as specified by OMB. Upon receipt, the FI or designated service provider matches this file against all open accounts. All matches are subsequently sent back to the State.

Multi-State Financial Institution Data Match (MSFIDM) Program

Related to the FIDM program is the Multi-State Financial Institution Data Match (MSFIDM) that permits FIs operating in two or more States to elect to conduct the match through OCSE's Federal Parent Locator Service (FPLS) or with individual States in which they do business. FIs doing business in more than one State are encouraged but not required to use MSFIDM. Therefore, States may wish to submit AEI requests in order to match with FIs in other States. OCSE will conduct the data-matching program for multi-State FIs based on delinquent parent files submitted by State CSE agencies. OCSE will turn the matches over to the appropriate State agency. OCSE has distributed an Election Form that allows multi-state FIs to select the means of data transmission, reporting periods, and service providers if appropriate. The Election Form also allows multi-state FIs to opt out of the OCSE process in favor of participating with the individual States. For information on the Election Form and data match timelines, refer to OCSE's FIDM web site: **http://www.acf.hhs.gov/programs/cse/fct/fidm/**

B. Business Processes

FIDM is not an overly complex process. It includes data exchange, freeze actions, and levy. However, when considering the entire picture, there are pre- and post-activities that present opportunities to enhance the overall process of collecting child support arrearage found at FIs. A broader look at FIDM includes the following processes:

- Agreements – This activity includes identifying, contacting, and securing agreements with FIs that do business within the State. FIs that do business in multiple States have the option of participating with MSFIDM or FIDM. Items such as Method One or Method Two choice, cost (if State's legislation has determined), media (tape, file, disk, fax), and exchange schedule are typically included in a memorandum of understanding (MOU) and sent by the CSE agency to the FI. In some cases, follow-up contacts are needed to secure the final agreements.

- Data Exchange – This activity is the actual loading of child support cases from the appropriate State system and depending on the match method selected, either sending that file to the FIs or taking the files sent from the FIs and matching records of delinquent obligors and account holders.

- Freeze Action – This activity handles the correspondence with FIs for those matched cases/account holders who are still delinquent based on established criteria set by child support. The result is that once an account is frozen, the obligor may not access their account for the monies owed child support. This activity also handles informing the obligor that their account is frozen.

- No Contest – This activity is primarily dependent on what action the obligor takes during the established waiting period between when they are informed of their account being frozen and the actual levy. State policy may permit the FIDM account to be unfrozen if the obligor makes a full settlement or provides an amount where the arrearage no longer meets the criteria established by the State, or negotiates some kind of agreement that will result in child support releasing the account.

- Contest by NCP or Joint Account Holder – This activity is primarily dependent on the State's administrative or judicial process for handling contests. The case record in the Statewide CSE system must be updated to reflect the match, the name of the matched FI and address update if applicable.

- Levy Action – This activity is the actual correspondence to the FI that causes the funds to be sent to child support and allocated to the delinquent case. All of the appropriate payment and status information related to the case must be updated.

In addition to the above processes, reporting for each activity is also important. For each of the other activities, various reports must be produced ensuring that child support is informed of each step taken in the FIDM process.

C. Automated System Alternatives

This section provides a brief overview of alternatives for FIDM automation. Each of the alternatives below is an actual method currently being employed by States. Links to additional information are provided where applicable. FIDM and AEI functionality is not required to reside in the Statewide CSE system, as long as the events are entered in the individual case record. FIDM and AEI functionality may be a module in the Statewide CSE system, or it can reside in a separate State developed stand-alone module which interfaces with the CSE system, or the FIDM match and/or the FIDM freeze and seize functionality may be performed by a stand-alone system administered by a private entity. In addition, a State may opt to have some functionality in different stand-alone systems.

Implement in CSE System

States may choose to perform the FIDM match via their Child Support Enforcement System. Functional criteria are located in Objectives E-12 and E-15 of *Automated Systems for Child Support Enforcement: A Guide for States.* This is the link to the Guide: http://www.acf.hhs.gov/programs/cse/stsys/dsts_cert_guide.html

Some automated operations are required as minimal functionality to meet certification requirements. Following this approach, functionality is added to the child support system that creates the files to be sent to the FIs and receives the files from the FI. All case status data that is necessary to be updated because of FIDM will be input directly into the child support system. Additionally, the FIDM matching criteria will be located with the child support system. Reports supporting FIDM will be added to the current portfolio of child support system reports.

Build a State-Developed Stand-Alone System

States may also choose to perform the FIDM match outside of their State Child Support Enforcement System via an alternative System. This alternative System must be able to perform the match functionality as outlined in the FIDM Requirements specified by the PRWORA Act of 1996. The major difference between this alternative and the previous one is that the case data necessary for the matching is loaded into an alternate database which then handles the import and export functionality with the FIs. Updates back to the child support system will be done via interface. Additionally, the FIDM matching criteria will be located in the standalone system, most likely as tables. Reports to support FIDM will be produced by the standalone system.

Privatized Stand-Alone System

States may choose to enter into an agreement with one or more vendors to conduct FIDM. The vendor will be responsible for meeting the same FIDM requirements that an agent of the State must meet (States need to specify these requirements as part of the procurement process and ensure via contract). Depending on the level of service the State wishes to purchase, the vendor may conduct all of the FIDM process or just some parts of it. For example, the vendor may offer only FIDM matches, or freeze and seize functionality or AEI functionality. States may wish to contract with different vendors because of the vendors' agreements with different FIs.

Consortium

A variation on privatization is a consortium of States coming together to share resources for a common set of functionalities provided by a vendor. There are three major consortia that support FIDM functionality: The Interstate Data Exchange Consortium (IDEConsortium) has 15 full partners, the Michigan FIDM alliance has 15 State members and the Child Support Lien Network (CSLN) has 26 members. These consortia offer different levels of FIDM matches, lien assistance and AEI functionality and not all the consortium members utilize all FIDM and AEI functionality offered by the consortium. In addition, some States are members of more than one consortium and have found it cost-effective to participate in this way in order to expand the matches with FIs in other States and AEI opportunities. Each consortium's FIDM functionality is discussed briefly below.

Interstate Data Exchange Consortium (IDEConsortium)

The IDEConsortium was initially developed in 1986 by a partnership of eight States with OCSE grant funds to improve collection and enforcement of child support. Previously known as Electronic Parent Locator Network (EPLN), its initial emphasis was on locate. After PRWORA, EPLN offered its members FIDM matching services and in January 2003 was awarded a Special Improvement Program (SIP) grant from OCSE for $414,574 to expand its FIDM services to include interstate freeze and seize or AEI services. The project was completed on March 1, 2004. The consortium changed its name to Interstate Data Exchange Consortium on July 1, 2007. Detailed information can be found on the web at: www.IDEConsortium.com.

Currently the IDEConsortium has 15 Full Member States. They are: Alabama, Arkansas, Delaware, Georgia, Kentucky, Louisiana, New Mexico, North Carolina, Oklahoma, Pennsylvania, South Carolina, South Dakota, Tennessee, Virginia and West Virginia. And within those States are 4,000 participating FIs in IDEConsortium. In addition to locate, IDEConsortium offers FIDM and AEI services to its members.

IDEC is State-owned and operated. Each Full Member or Limited Partner State is admitted to the consortium through a State contract containing a memorandum of understanding (MOU) agreement administered by the South Carolina Department of Social Services (SCDSS), which serves as the "Seat Agency." Each Full Member State has a representative and a vote on the IDEConsortium Policy Board, which meets semi-annually. SCDSS provides oversight and maintenance of the contract for the development, operation, maintenance and marketing of the IDEConsortium services.

For the FIDM match, 15 Full Member States and 4,000 FIs participate. The quarterly matching efforts have resulted in more than 8 million successful matches with accounts belonging to parents delinquent in their child support payments. Since 2002, IDEConsortium FIDM matches have resulted in more than 1 million interstate matches.

Starting in September 2007, IDEConsortium offered a Limited Partner solution for States who conduct their own in-state FIDM matches or have procured the services of a different vendor or consortium to perform the matches as required by Federal law. For example, Texas is a member of the Michigan FIDM alliance and utilizes that consortium for its FIDM matches. However, the State was interested in the potential of AEI matching with the 15 different States and 4,000 FIs in the IDEConsortium and joined as a full member in September 2005. During the period July 2006-June 2007, Texas utilized the AEI portion of the IDEConsortium website to receive 61,910 interstate FIDM matches and collected $783,113 through AEI.

Since Texas did not utilize two of the three IDEConsortium services, locate or FIDM matching services, the IDEConsortium Policy Board created the Limited Partner option now provided. Limited Partners in the IDEConsortium agree to conduct a match of the other IDEConsortium States inquiry arrears files with the FIs in the Limited Partner State and submit their inquiry arrears files to IDEConsortium. Limited Partners have a different

fee structure for FIDM inquiry arrears files and an annual flat fee for utilizing the IDEConsortium AEI component. The Limited Partners are also provided reporting information such as the number of records processed, number of FIs, total number of matched accounts and a breakdown of the matched accounts by FI and State where the account is located. The IDEConsortium is in Limited Partner contract negotiations with multiple States.

IDEConsortium's AEI functionality

The IDEConsortium AEI system is a secure web-based application that provides an online collaborative platform for member States to initiate and respond to AEI requests through a secure website address or by installing a direct line to IDEConsortium. The system includes:

- A relational database that stores FI information, maintains and easily updates State specific freeze and seize criteria, case tracking data and user security information.

- A user-friendly browser based interface with on-line help information.

- An Extensible Markup Language (XML) framework based external file that loads FI information.

- Batch processing as an option for States wishing to submit multiple AEI requests.

- On-line freeze and seize forms containing pre-populated case and FIDM information.

- Routine and on demand report generation that produces activity, statistical and management reports that are presented in PDF or text formats.

Because of the costs associated with statewide system modifications and the fear of large numbers of requests for assistance from neighboring States, the AEI system has been developed to avoid modifications to existing statewide systems. The system also allows States to control the number of requests for assistance they receive by submitting and adjusting online their AEI database seizes and freeze criteria and thresholds. Now assisting States will get only those AEI requests that meet their criteria and thresholds.

The IDEConsortium AEI system and process include:
- Preloaded FIDM and State provided case load MSFIDM data to eliminate the need to enter the required information in each AEI request.

- Drop-down menus and automatic tabbing to the next required input field.

- Receipt of AEI request acknowledgements from assisting States (intended to avoid the "black holes" in interstate requests).

- Status updates, activity recording and tracking for freezes, contests, seizures, collections and closures.

- Searches by authorized users by State, Case ID, NCP SSN, and FIs by TIN and by AEI action.

- New action or change action notifications by e-mail.

- Maintenance of a profile for each Full Member or Limited Partner State that identifies their unique business rules for freeze and seize criteria. These thresholds can be modified in real time. No actions are sent to the assisting State unless minimum thresholds are met.

- Immediate error notification on the user screen when the assisting State thresholds have not been met.

- Reports, including daily administrative reports, status reports for both requesting and assisting States, workload reports, action detail reports.

- OCSE-34A and OCSE-157 required data.

Using its AEI functionality, IDEConsortium has reported collecting over $1,262,393. Since January 2007, IDEConsortium States, with the assistance of other Full Member States, have reported the following large balances collected from delinquent obligors:

Oklahoma, with assistance from Tennessee	$25,000 and $14,000
Oklahoma, with assistance from Texas	$15,000
South Carolina, with assistance from Oklahoma	$38,000
Texas, with assistance from Georgia	$10,000
Texas, with assistance from Oklahoma	$16,000 and $12,000
Texas, with assistance from Tennessee	$25,000 and $21,000

Michigan FIDM Alliance

In 1999, a consortium of States led by Michigan released a Request for Proposals (RFP) to outsource in-state FIDM operations. The consortium goals were:

- The increase of child support collections through the identification and location of FI accounts of delinquent obligors,
- Facilitation of interstate case processing,
- Simplification, standardization and centralization of the data match for participating States, and
- Savings through cost sharing for the FIDM process of many States.

The States participating in the consortium include: Alaska, Arizona, Colorado, Illinois, Indiana, Maine, Maryland, Michigan, Montana, Nebraska, Nevada, North Dakota, Ohio, Texas, and Wisconsin.

These 15 States have entered into an Alliance for the purpose of outsourcing their in-state FIDM operations. The Alliance is a coalition of States formed to cooperatively develop, issue, and oversee these contracts. Michigan, as the lead State, serves as contract administrator. The 5,516 FIs matched by this consortium include:

State	FI Count
Alaska	18
Arizona	99
Colorado	195
Illinois	1,076
Indiana	357
Maryland	172
Maine	102
Michigan	525
Montana	141
North Dakota	151
Nebraska	302
Nevada	57
Ohio	583
Texas	1,185
Wisconsin	553
TOTAL	5,516

The Michigan FIDM Alliance utilizes a website that permits States to approve both in-state and interstate FIDM matches. The Administrator for each participating State enters the criteria for their State, such as minimum balance required to lien an account or minimum arrears to lien an account. All State staffers authorized to use the Alliance website review the matches to determine which accounts are to be liened. After the staffer indicates which accounts have been approved for lien, the system goes through a series of checks to ensure that all State laws are adhered to. The site has a lien assistance feature that is used to assist States with levying accounts at FIs that do not accept direct liens. The functionality allows participating States to create business rules around the issuing of a lien to an out-of-state institution. The requesting State staffer selects lien assistance from the website menu. The user will be prompted to enter a Social Security number (SSN) and the system will retrieve information based on that SSN from the enforcement database. The requesting State staffer uses the Levy Request function to request a lien to another participating State's FI. The participating assisting State enters that portion of the website, pulls up the lien data by SSN and approves the account to be liened in accordance with the assisting State's lien criteria. The website maintains copies of each participating State's notice templates, which allows the Alliance to issue liens on behalf of the participating State instead of the State having to send out the lien notice. If there is required information that is not automatically populated from the enforcement database, the manual lien request can be used by the requesting State staffer to enter the missing information.

At the present time, Texas is the only State utilizing the lien functionality because there is setup time for each State that wants to use it to get their notice templates created, business rules incorporated, etc. Texas is not using the AEI functionality in the Michigan FIDM Alliance since multiple States are needed to make it work. In the year 2006, the first year Texas used the tool, it issued over 9,800 liens and collected over $6.1 million.

These results were from in-state matches and from out-of-state matches where the FI accepted a direct lien.

More information on the Michigan FIDM Alliance can be found at:
http://www.tier.com/solutions/CSE_fidm.cfm

Child Support Lien Network

A third consortium, the Child Support Lien Network (CSLN), was developed primarily for insurance match and has 26 member States utilizing CSLN for insurance match purposes. But CSLN also has FIDM functionality that is currently being used by at least two States, Rhode Island and Georgia. Rhode Island found that the CSLN Insurance Intercept software was easily modifiable to meet the requirements for FIDM matching with FIs since insurance claim matching is very similar to matching delinquent obligor cases with FIs. This is especially true when the same workforce responsible for insurance claim enforcement would also be responsible for taking the follow-up enforcement and collection actions on cases that matched to a financial account through the State's FIDM processes.

CSE data from the InRHODES system is loaded into the CSLN FIDM database for the matching processes with the FIs. CSLN FIDM can handle both Method One and Method Two processes, depending on the desires of the in-state FI. MSFIDM matches are also loaded into the CSLN database for processing. CSLN software analyzes the returned data for errors, duplications and criteria established and approved by the State before actual update and lien issuance is performed. Any tasks performed on the CSLN FIDM system are sent via an interface to InRHODES to match to a child support case for monitoring, tracking and review if necessary. Additionally, the CSLN FIDM matching data is retained in the CSLN web-enabled system for further enforcement and management activity. All actions taken are tracked and updated back to the CSE mainframe case. InRHODES issues reports supporting FIDM as well as CSLN online reports in real time with various views for caseworkers and managers. AEI is a function of the InRHODES system in Rhode Island. InRHODES is capable of referring interstate AEI requests to CSLN for FIDM processing and also capable of receiving updates from CSLN back to InRHODES on the processing results.

CSE FIDM data from the Georgia system is loaded into the CSLN FIDM database for processing with the FIs. CSLN FIDM can handle both in-state and multi-state matches from multiple sources for processing by CSLN staff. CSLN software analyzes the returned data for errors, duplications, and criteria established and approved by the State before actual update and lien issuance is performed. The actual update to the Georgia child support case is performed via an interface. Additionally, the CSLN FIDM matching data is retained in the CSLN web-enabled system for further enforcement and management activity. All actions taken are tracked and updated back to the CSE mainframe case. The Georgia system as well as CSLN provides online reports in real time with various views for caseworkers and managers.

The benefits for Rhode Island and Georgia of doing FIDM processing on the stand-alone CSLN system include:

- CSLN FIDM System brings a desk-top solution with full integration with the Internet. Workers log in to a secure site and can perform all tasks for on-line process of match results, sharing of information, documents and reports with clients, other offices, State or local agencies, and all interested parties.
- Management and tracking of agreements with FIs on CSLN system.
- Providing instant reports on the monitoring of FIs for compliance.
- Providing a quick and economical fine-tuning capability for software customization for specific tasks and sub-tasks as the FIDM roll-out progresses.
- Staggered reporting cycles for in-state FIs for interfacing of CSLN delinquent obligor files with financial deposit accounts and other financial asset instruments of the delinquent obligor on deposit with banks, credit unions and FIs.
- CSLN FIDM can also process matches received from OCSE from MSFI reporters.
- Providing FI reporting via all media types and methods.
- Providing continuity and familiarity of a single web system that can be utilized by enforcement caseworkers involved with both insurance claim intercept activity and FI match activity.
- CSLN provides a secure, internet State FIDM website for the CSE agency that provides for immediate automated lien and income withholding forms generation on accounts by State priorities, while allowing CSE staff to track the data match through its follow-up activities, including holding periods, hearings and ultimate collections.
- CSLN FIDM can organize the matches by county, office, specialist or caseworker and provide an up-to-the-second status on each individual match or groups of matches by worker level, unit levels, statewide levels, date, and FI, or by the financial account balance.
- Collection activity against the asset is immediate on CSLN -- not delayed or lost altogether by cumbersome and time-consuming mainframe computer processes that have to occur before a lien or withholding order is placed against the asset.
- CSLN FIDM system can age the matches and send alerts to workers or supervisors on the status of the lien and when a collection is overdue from the FI -- all done through a secure, customized web site.
- Supervisors and senior managers know how their CSLN FIDM matches are doing on a real time basis.
- CSLN FIDM report generation for supervisors and managers is flexible because it is customized for the State's preferences.
- CSLN FIDM provides updated files back to the State's CSE mainframe system on the FIDM match so that all users, including those that staff the CSE call centers, can have access to the latest FIDM information.

- CSLN FIDM provides email functionality for instant communications with other staff, supervisors or FIs.
- Processing FIDM file results matched against FIs.
- Data matches are sorted to facilitate working the matches, which allows caseworkers to work the most productive matches first.
- Providing electronic liens (holds) to FIs until the State CSE agency generates forms from the mainframe.
- Providing actual lien document creation on State stationary via CSLN with electronic signature, if opted by the CSLN member State.
- Tracking all actions of FIDM on the CSLN system with uploads to the mainframe system.
- Providing various reporting formats to State managers, including instant views of statuses on matches, caseworker efforts and historical data.
- Providing electronic files to update the State CSE system and individual cases.
- Providing CSE with new locate information on the delinquent obligor that is gathered from the financial asset information.

In addition, CSLN provides States with professional outreach services under separate billing to FIs to encourage and elicit participation in the State's FIDM process.

Direct Levy

A handful of States permit direct lien and levy, which permits a State receiving the FIDM match information to directly lien and levy the account in the other State and not have to submit an AEI request.

OCSE's MSFIDM staff maintains a list of FIs participating in MSFIDM that are likely to accept or not accept direct lien and levy, and those which regionalized their levy operations. Regionalized operations means that the FI has agreed to accept direct actions on accounts from the States in which they do business at one centralized location. Examples of FIs with regionalized operations are Bank of America and Wells Fargo. This list is generated quarterly and sent to the FIDM State contacts.

Unfortunately, nothing is as easy as it seems or should be. Even though the law may allow for direct levies, some FIs will not accept levies from other States. The following summary was taken in part from Oklahoma's FIDM training, which provides a summary of the variations required by jurisdictions and FIs that will accept direct levy.

These are:

-Delaware:	-New Mexico: **
-Guam:	-New York: ***
-Illinois:	-North Carolina: ****
-Massachusetts:	-South Carolina:
-Michigan: *	-Texas: *****
-New Jersey:	

* Michigan will add a cover letter and forward levies to the appropriate FI. Contact our FIDM Unit for assistance.

** Wells Fargo accounts in New Mexico will need special handling. Contact the FIDM unit to make arrangements to get these levies in place.

*** New York law allows for direct levies; however, some FIs, other than brokerage houses (Met Life, Smith Barney, Merrill Lynch, etc.) and major banks will only accept levies using the levy format specified under New York law.

**** North Carolina allows for direct levy; however, if the caseworker is having difficulty with an FI accepting the State's direct levy, the caseworker will need to contact the North Carolina FIDM Unit for assistance.

***** For some Texas accounts, the caseworker will need to ask for assistance from the FIDM Unit. Accounts with USAA, Comerica, Regions, Santa Fe Credit Union, Share Plus Federal and Wells Fargo will need to have cover letters attached.

To make things even more complicated, some FIs will have different rules on how they treat levy requests based on where the account is located. The following list of FIs is by no means conclusive, but it should give you a good idea of how complicated this problem is.

- Brokerage Houses and Securities Firms. A large number of brokerage houses and security firms will accept direct levies. Examples include E-Trade, First Clearing Corporation, Merrill Lynch, etc. If you have any questions regarding going after one of these accounts, contact the FIDM Unit for assistance.

- Arvest Bank: Arvest will accept direct levies for accounts located in Oklahoma. However, if an account is located in Arkansas, then it is necessary to send an AEI request to Arkansas CSED.

- Bank of America: Bank of America is very accommodating to our levy requests. Since it does business in Oklahoma, it is willing to accept levy requests for accounts located in other States it serves.

- Compass Bank: It will accept Oklahoma levies for accounts located in New Mexico and Texas. However, if an account is found in any other State, then the caseworker may need to send an AEI request to the State where the funds are located. Contact the other State FIDM unit first before you send a levy on a Compass Bank account located anywhere other than New Mexico or Texas.

- Regions Bank: Presently, Regions Bank accounts in South Carolina and Texas can be accessed by the Oklahoma CSE agency by going through both the South Carolina and Texas FIDM Units (similar to how USAA and Wells Fargo levies

are sent). Send the levy request (FI copy of Notice of Levy and FI response form) to the other State's FIDM Unit. Oklahoma will forward the levy documents to the respective FIDM Unit and they will place a cover letter with Oklahoma's levy request. Upon being notified of the notice being sent to the FI, the worker will then send out the NCP's notice once the proper waiting time period has passed.

- USAA Bank: For accounts located in Texas, send levy requests (FI copy of Notice of Levy and FI response form) to the other State's FIDM Unit. Oklahoma CSE agency will forward the levy documents to the Texas FIDM Unit and they will place a cover letter with Oklahoma's levy request. Upon being notified of the notice being sent to the FI, the worker will then send out the NCP's notice once the proper waiting time period has passed.

- Wachovia Bank: This bank is listed as accepting direct levies from all States. Oklahoma CSE has had success in levying accounts in a wide variety of States that they do business in.

- Wells Fargo: Presently Wells Fargo accounts in other States can be accessed by Oklahoma by going through the Texas FIDM Unit (similar to how USAA Bank levies are sent). Send the levy request (FI copy of Notice of Levy and FI response form) to the other State's FIDM Unit. Oklahoma CSE will forward the levy documents to the Texas FIDM Unit and they will place a cover letter with Oklahoma's levy request. Upon being notified of the notice being sent to the FI, the worker will then send out the NCP's notice once the proper waiting time period has passed.

An additional document provided by OCSE lists Regionalized MSFIs. Regionalized means that an FI has agreed to accept direct levy actions from various States that do business in one centralized location. Therefore, if the caseworker finds an account in a State within the same region that includes Oklahoma, that FI should accept a direct levy request from Oklahoma.

AEI and UIFSA Transmittal #3

If the FIDM assets are located in another State where the FI does not accept direct levy, the State must submit an AEI request. One method for States to request such a limited service request is through the use of UIFSA Transmittal #3. However, this form is not mandated. Several States will not accept UIFSA Transmittal #3, and other States have requirements such as providing a copy of the order and payment history.

OCSE maintains a listing of whether States will accept the UIFSA Transmittal #3 and under which circumstances. Periodic updates of this list are emailed to the MSFIDM State point of contact. A listing is in Appendix A.

Limited service requests

Many statewide CSE systems have difficulty accepting and processing limited service requests because their systems are not capable of selecting the enforcement mechanisms available for AEI requests. Oklahoma's OSIS is an example of a system that is able to turn off various enforcement remedies for AEI requests and process only the AEI FIDM freeze and seize request. However, ensuring that the AEI request is closed after the limited service request is processed and that the AEI requests are reported correctly on the OCSE 157 and 34A forms often requires manual intervention.

The Deficit Reduction Act of 2005 (DRA), P.L. 109-171, included an amendment to section 466(a)(14) of the Social Security Act dealing with administrative enforcement in interstate (AEI) cases. Effective October 1, 2005, section 466(a)(14(A)(ii) of the Act was amended to provide that, while neither State may consider the case to be transferred to the assisting State's caseload, the assisting State may establish a corresponding case based on a requesting State's AEI request for assistance. The amendment provides States the option to use the statewide automated system to process AEI requests.

Data Standardization

MSFIDM data match utilizes standardized data specifications and reporting methods. Data matches for MSFIDM are done by Method Two. States employ one or both of the following two methods using data specifications approved by OMB (OMB Control Number 0970-0196). For more information please see the *Financial Data Match Specification Handbook*. A copy of the file layouts are included as part of this document as Appendix A. The *Financial Data Match Specification Handbook* can also be downloaded from the OCSE web site at:

http://www.acf.hhs.gov/programs/cse/fct/fidm/dataspecs.pdf

1999-2000 MSFIDM/AEI Workgroup

Based on discussions at the OCSE Systems Conferences in 1999, the decision was made to pursue creating a process for States to send and receive AEI requests to freeze and seize assets identified through MSFIDM.

Objectives of the MSFIDM/AEI effort:
- Form a Workgroup of OCSE and State representatives
- Develop recommended policy, Record File Layouts intended to implement MSFIDM/AEI nationwide and program for the automated process
- Initiate requests for States to volunteer to participate in a MSFIDM/AEI Pilot Project
- Assist States in meeting the PRWORA – AEI related systems certification requirements by September 30, 2001
- Maintain the integrity and security of the financial and child support data transmitted in the AEI process

OCSE established a Workgroup comprised of representatives from OCSE and State CSE agencies (California, Florida, Illinois, Minnesota, New York, Texas, and Washington). The Workgroup agreed to pilot the AEI system before making it available to all States. Work on the pilot project began in September 1999. Pilot States included Illinois, Massachusetts, New Jersey, New York, and Washington.

Pilot States agreed to adhere to the following AEI Tracking List, which included the following MI data:

- Number of AEI requests made by State
- Number of AEI requests accepted by State
- Number of AEI requests rejected by State & reason for rejection
- Number of liens issued by State
- Number of accounts attached with assets (% of hits)
- Number of informal complaints
- Number of formal requests for hearings
- Amounts seized

Data Processing

In October 1999, the workgroup developed a record layout to transmit AEI requests electronically. The layout consisted of three parts: (1) the initiating State record layout, (2) the acknowledgement by the assisting State layout, and (3) the assisting State passback record layout (see Appendix D).

OCSE completed the AEI system programming in November 1999. Based on the results of the pilot, OCSE did pursue full implementation of the AEI System.

2003 Proposed MSFIDM OCSE Levy Process

In 2003, OCSE established a Workgroup comprised of representatives from State CSE agencies, OCSE and the financial industry. The workgroup resulted in the following:

- Developed standard elements for freeze/seize request and a draft "standard" freeze and seize form.
- Developed screen shots for a web application that could be used by both States and MSFIs to automate the delivery of the freeze/seize request and the MSFI response.
- Based on a recommendation that came from a May 2004 meeting OCSE held with IV-D directors and representatives of FIs, OCSE established Sub-Workgroups to address three specific areas; Jurisdiction, Standardization and AEI.

Standardization Sub-Workgroup Goals

- State-by-State "Commonality" Matrix which captures details about every State's levy process and whether it is driven by State law or policy.
- State-by-State Account Matrix which identifies accounts eligible or not eligible for account seizure.
- Creation of smaller groups to address a standard form, definition of account and current best practices and variations between State levy processes.
- Creation of additional group to further investigate standard, critical data elements needed for a levy request and variations between State levy processes.

Jurisdiction Sub-Workgroup Goals

- Explore issues related to enforcing child support levies across State lines when an FI does not do business in the State that issues the levy.
- Identify these differing interpretations, to recognize barriers to enforcing interstate levies

The group agreed that in order to make the process work, MSFIs need to know what the law is governing child support liens in each State in which they do business. The group discussed ways to gather this information centrally and make it available to FIs. The idea would be for each State to give a definitive statement of their law, so that if the banks relied on it in honoring liens, they would not be held liable.

The legislative proposal to add authority to MSFIDM to permit States the option of conducting freeze and seize actions at the Federal level has not been acted upon. However, OCSE is reviewing the work products from the earlier workgroups to develop a standardized levy form and the proposed data elements and recommendations will be presented to the OCSE Data Standards Oversight board.

EFT/EDI

FIDM collections may be transmitted from an FI to the State Disbursement Unit (SDU) utilizing electronic funds transfer/electronic data interface (EFT/EDI). EFT/EDI refers to the process of sending child support payments electronically through the Automated Clearing House (ACH) banking network. Electronic Funds Transfer (EFT) refers to the sending of money electronically. Electronic Data Interchange (EDI) refers to sending the case information that States need in order to post the payment and credit the noncustodial parent.

FIs can send their child support withholdings electronically instead of by paper check. This is done through the U.S. Treasury to the ACH banking network, which coordinates EFT/EDI ACH transactions. ACH is the network that has successfully delivered direct deposit payments for employees and government benefit recipients for more than 25 years.

In the CCD+ addendum record, remittance information corresponding to the child support payment made to the SDU uses a Data Element Dictionary or deduction data segment under ASC X12 syntax and is composed of ten fields. The Application Identifier is the second of these ten fields. There are four FIDM application identifiers in addition to the six Interstate and one direct payer identifier. Codes FD (FIDM funds from an FI), IF (FIDM funds from a non-cost recovery State to another State) and RF (FIDM funds from a cost-recovery State to another State) may be used to identify payments from FIs as part of FIDM freeze and seize.

Several States have indicated that they have programmed for the FIDM application identifiers. These States include: North Carolina, Nebraska, Montana, Oklahoma, Texas and Washington. Washington has piloted the use of EFT/EDI using the FIDM application identifiers with US Bank.

Information on EFT/EDI, including the User's Guide for Electronic Child Support Payments, can be found at http://ecsp.nacha.org

D. Case Studies in FIDM Automation

OCSE met with program and IT staff in Florida and New York to learn about the FI data match automation they implemented, to describe the design and implementation steps involved, and to hear about the benefits to both the client and the program that resulted. The information collected during the site visits was used to develop a case study describing each State's experiences.

The full text of the case studies can be found in an Addendum to this document; each is divided into the following sections:

- State Profile
- Background
- Business Process
- Automation Process
- Challenges and Solutions
- Lessons Learned and Recommendations
- State Statute
- Contact Information

State planners and system design staff are encouraged to read the case studies as they provide information that will be helpful during the planning, design, and implementation phases of an automation and process improvement effort.

Chapter III: DISCUSSION GUIDANCE AND ASSISTANCE

State personnel can use the information provided in this section to evaluate their FIDM process and automation against some ideas that could result in improvements. An overview is provided in Section A. This chapter of the guide provides a great deal of "food-for-thought" organized by the FIDM processes described in the previous section. Additional resources are also provided supporting the discussion as well as addressing other aspects of FIDM enhancements.

A. FIDM Process Discussion Guide

This discussion guide will be helpful for IV-D Directors, managers responsible for FIDM, system administrators, business analysts and system designers involved in assessing the current level of FIDM process design and automation and determining the extent to which enhancements may be made. The guide examines each of the significant FIDM process components in terms of process, organization, and automation. It will be helpful to refer to the flow diagrams while reviewing the discussion guide since it references the major process steps as well as the sub-activities contained on those diagrams.

In many cases, States will have automated some but not all of the FIDM process components, so the discussion guide serves a dual purpose: 1) For those components that have already been automated, the guide can be used in conjunction with other tools to help determine whether there are potential areas that could be improved. 2) For those process components not yet automated, the guide serves as an analytical tool to determine the extent of the automation enhancement effort. Additionally, since many of the FIDM opportunities for enhancement are for other than the data match, discussions of process and organization are also provided.

Where possible, discussions are based on FIDM data from research. However, some of the guidance is anecdotal. This is because it was the desire to include as much discussion as possible even if based on inference. Another reason is that there is not as much data available related to FIDM, as say, Federal Income Tax Offset.

The discussion guide incorporates PAID In Full #3 on FIDM Freeze and Seize processes. PAID In Full is a compilation of early intervention, order establishment, locate, enforcement, and arrears management practices, along with implementation criteria that facilitate successful outcomes. The questions under each practice are intended to assist readers in looking for methods to optimize their processes. The questions are organized into three categories for consideration: Organizational, Process, and Automation.

The Guide recognizes that all States and Territories have already enacted legislation to implement the FIDM process. In addition, in order for their systems to be FSA and PRWORA certified, the States had to automate the data match. The intent of this Guidance document is to assist States in reviewing their organization, processes and level of automation, to determine where improvements can be made.

B. Summary of Discussion Guide

This section summarizes the guidance discussion organized by the three categories: process, organization, and automation.

Process

First, it is essential to know how FIDM is being conducted within the State today. Ideally, there is solid documentation describing the process. One of the key areas to review is the actual business rules documenting the various criteria. The question needs to be asked concerning what is permitted in statute vs. what is actually being enforced. Also, more than likely, the opportunities for enhancement are not within the data match. The FIDM process must be considered holistically. Are these processes optimized for the freeze and seize as well as settlement?

Organization

The most significant aspect to examining FIDM relative to organizational change is centralization of the processes. Just about one-half of the States/Territories have centralized the freeze and seize process according to the IRG. There is no specific data available to say that their operations are more effective. However, there appears to be some opportunity to eliminate some steps in the FIDM process under that structure. For example, there are times in a non-centralized operation where both local and central staffs do reviews. Another option is to partially centralize. Florida, for example, has some processes done by a central unit while others are done locally. This model may make sense since some activities (like settlement) by their nature are face-to-face.

Related process, organization, and automation should be primary considerations for using a vendor/consortium for FIDM. OCSE is not recommending any particular consortium or vendor. However, if an option exists that reduces a State's costs of FIDM operation, it should be considered.

Automation

One automation step must be an assessment of the level of automation. Are the threshold criteria automated, thus reducing manual reviews? New York, as an example, has essentially automated the entire process permitting the local worker to focus on processes that require face-to-face contacts. Also, automation of correspondence and contacts could result in increased effectiveness.

About half of the States/territories are either not automated, partially automated, or in the process of automating the freeze and seize process according to the IRG. It makes sense that States initially focused on data match automation, but a broader look at automation opportunities is now warranted.

C. PAID In Full #3 FIDM

Organizational Considerations

√ Have you considered the benefits of centralizing the FIDM freeze and seize process?

- If your local offices are reluctant to agree to a centralized freeze and seize process, have you considered centralizing just the issuing of notices, customer service, or the processing of FIDM freeze and seize responses?

√ Do you provide a centralized point of contact for FIs related to the FIDM process?

√ Do you have training for workers to help them determine which matches are appropriate or require action to initiate freeze and seize?

√ Have you considered asking for additional legislative authority? For example, after its pilot, Florida requested early levy authority for noncustodial parents who were willing to waive the statutory wait period between lien and levy.

Process Considerations

√ Have you considered eliminating or lowering your threshold for freeze and seize action? Twenty-six percent of States/Territories have no minimum delinquency threshold. Another 26 percent have a threshold between $100 and $500.

√ Have you reviewed the types of financial accounts that you initially exempted from FIDM freeze and seize or the threshold you have set to determine if these thresholds or exemptions are still valid?

√ Has your State developed a process with those States that do have laws requiring financial institutions to process out-of-state notices to have the financial institutions' resident State affirm that your notices meet the due process requirements of those States?

√ Does your State accept and process a Uniform Interstate Family Support Act (UIFSA) Transmittal #3 or an AEI request from a State that is requesting assistance in the FIDM freeze and seize process?

√ Does your State send Transmittal #3 requests to facilitate freeze and seize actions when FIs are not doing business in your State, not required by law to accept out-of-state notices, or on OCSE's report of financial institutions that accept out-of-State notices?

√ Was your staff initially reluctant to process FIDM freeze and seize because of concern over the accuracy of the arrears balance? If so, have you considered using the same thresholds as offsets which have certified arrears? If you initially required an audit of arrears balances, have you re-visited this requirement?

√ If your State exempts joint accounts from freeze and seize, have you considered requiring the joint account holder to appear in Court in order to obtain a release after

the 2nd freeze and seize action to discourage using the joint account to hide NCP assets?

√ Does your FIDM process require one or two steps for issuing the notice? Do you have to send a notice to freeze and a separate notice to seize? If two steps are required, is this by State law or based on State process?

√ Have you considered the ability of the customer service unit and/or caseworkers to handle the influx of calls when you schedule sending Freeze and Seize notices?

√ If capacity to handle an influx of FIDM related inquiries is not a factor, have you considered increasing the frequency of your FIDM freeze and seize processing?

Automation Considerations

√ Does your State system maintain a table indicating whether financial institutions outside the State will accept a direct levy?

√ Does your State system receive matches from your in-State or the Federal multistate match process and determine, without staff intervention, which matches are eligible for freeze and seize based on your State's criteria?

√ Does your State system generate freeze and seize notices without caseworker intervention as quickly as possible after receiving eligible matches in order to avoid changes in the arrears and account amounts?

√ Have you automated the "back-end" of the FIDM freeze and seize process?

- Does your State system automatically search to determine if payment(s) has been made on the case?

- Does your State system automatically remove the case from the FIDM match file, release the freeze action and/or stop the seizure based on changes in the NCP's circumstances?

√ Does your State system track compliance of in-state financial institutions and generate notices to those out of compliance and a tickler for staff follow up if the financial institution is unresponsive to the notice?

√ Does your State system electronically transmit freeze and seize notices to financial institutions?

√ Does your State system generate freeze and seize notices for financial institutions doing business in your State with out-of-state freeze and seize addresses?

√ Does your State system generate freeze and seize notices for financial institutions not doing business in your State, when the State the financial institution resides in requires them to process out-of-state notices?

√ Does your State system generate freeze and seize notices for financial institutions not doing business in your State if the financial institution is listed on OCSE's report of financial institutions that accept out-of-state notices?

√ If the other State where out-of-state FIDM assets have been located does not accept a direct notice and levy, do you use an AEI process? If so, is this automated?

√ Have you developed a filtering mechanism to ensure that your AEI FIDM freeze and seize request meets the criteria of the State in which the assets are located?

√ Have you considered using the FIDM match data for other purposes such as locate of delinquent obligors? This has proven cost effective for States that are required to pay the financial institution a fee for each match.

√ Have you considered having your State system save every FIDM document generated as a PDF file to avoid having the caseworker make hard copies of the document for the official file?

√ Have you considered automating the process of sending Freeze and Seize notices to avoid the caseworkers having to fold, stuff and postage each letter?

√ Does your State system accept Electronic Funds Transmittal/Electronic Data Transmittal (EFT/EDI) from financial institutions?

√ Have you considered using the core programming for FIDM freeze and seize for other enforcement remedies? For example, MS-FIDM is based on the offset process and in Florida, both lottery intercepts and driver's license suspensions are based on the core programming for FIDM.

Benefits

Significant efficiency to the collections of arrears can be realized by maximizing the technology available and streamlining the use of the functional processes of FIDM freeze and seize. This has been accomplished using a variety of approaches.

Colorado has enhanced automation of the match and accompanying freeze and seize process within its Automated Child Support Enforcement System (ACSES) which also provides obligor locate information to the CSE program. The system has provided over $6.5 million in collections since inception. Notable enhancements to the system provided freeze and seize actions on joint accounts, sole proprietorship accounts, and adjustment of the target arrears threshold to $1,000 across all orders. Another enhancement excluded obligors who were currently paying from the process, thereby minimizing the appeals process on freeze and seize actions. These enhancements alone provided a 65 percent increase in collections after implementation over the previous highest monthly collection totals.

New York contracts with a vendor to conduct FI matches with a State-supplied weekly inquiry file prepared by the State's Child Support Management System (CSMS). This file is built using front end selection criteria. The vendor conducts matches with FIs via Method One and Method Two practices, and handles all FI outreach efforts, agreements and customer service. New York has 100 percent in-state FI participation and over $50 million in collections since inception. New York ranked 9th in average quarterly returned

matches through MSFIDM and 1st in voluntary reported collections in 3Q2006 through 2Q2007. Collections totaled $14.6 million in that time frame.

D. Supporting Tools/References

The following are additional items that support the discussion guide or provide other tools to assist in the evaluation of a State's FIDM enhancement potential. They are taken from other initiatives or derived from material that is referenced in this document.

Intergovernmental Referral Guide (IRG)

In addition to the specific profile information included with this guide, there is a valuable website that has extensive profile information about each State. That site is the IRG Public Map Page. Information of particular interest may be found after selecting a State under section "J. Support Enforcement." The website is:

http://ocse.acf.hhs.gov/ext/irg/sps/selectaState.cfm?CFID=482586&CFTOKEN=35693212

One interesting question in the IRG is *"J5.14, Is the Freeze and Seize operation in your State centralized or automated?"* Further inquiries into whether a State is centralized may prove useful to States enhancing FIDM since it may be an opportunity to be more efficient in their collections. The responses in the table below were taken from the IRG.

Alabama	Alaska	Arizona	Arkansas	California
Centralized. In process of being automated	Centralized	Not centralized. Partially automated	Centralized. Not automated	Centralized. Automated
Colorado	**Connecticut**	**Delaware**	**District of Columbia**	**Florida**
Not centralized. Automated. AEI process may be manual process.	Centralized. Not automated	Centralized. Not completely automated.	Centralized. Not automated	Centralized but not automated.
Georgia	**Guam**	**Hawaii**	**Idaho**	**Illinois**
Not centralized. Forms are automated after manually selected by case manager.	Information not available at this time	Not centralized. Not automated.	Centralized and somewhat automated.	Centralized. Semi automated.

Indiana	Iowa	Kansas	Kentucky	Louisiana
Centralized. Semi automated.	Centralized and automated.	Not centralized. Not automated.	The local judicial and State caseworkers complete the freeze and seize actions. The process is not automated.	Not centralized or automated.
Maine	**Maryland**	**Massachusetts**	**Michigan**	**Minnesota**
Automated.	Not centralized. Not automated.	Centralized and Automated.	Centralized.	Automated.
Mississippi	**Missouri**	**Montana**	**Nebraska**	**Nevada**
Centralized. Practically automated.	Centralized after the notice (lien) is initiated. If the case/account meets selected criteria, liens are generated automatically, but staff makes the final determination to issue the lien.	Automated but not centralized.	Not centralized. Not automated	Neither centralized nor automated.
New Hampshire	**New Jersey**	**New Mexico**	**New York**	**North Carolina**
Not centralized. Automated	Centralized. Automated	Centralized – Automated	Automated	Centralized and automated
North Dakota	**Ohio**	**Oklahoma**	**Oregon**	**Pennsylvania**
Not centralized. Partially automated. System will identify likely cases and track timeframes. Workers will review case information, generate documents, and take appropriate actions	Automated	Automated levies are centralized. Matches not meeting automated criteria are referred to district offices for review and potential manual levy.	Centralized; not automated.	Not centralized. Automated

Puerto Rico	Rhode Island	South Carolina	South Dakota	Tennessee
Centralized and automated.	Centralized.	Centralized.	Not centralized. Not automated.	Not centralized. And not automated.
Texas	**Utah**	**Vermont**	**Virginia**	**Virgin Islands**
Centralized and partially automated. System will identify cases and track timeframes. Workers will verify assets, send documents and initiate seizure actions.	Not centralized. Not automated.	Centralized.	Not centralized. Not automated.	
Washington	**West Virginia**	**Wisconsin**	**Wyoming**	
Not centralized. Semi-automated.	Centralized	Combination. Selection of accounts for seizure will not be centralized. Issuance of levy notices to FIs will be centralized. Not automated.	Not centralized. Partially automated. The system identifies and tracks cases. The worker verifies information, generates the documents and takes seizure actions.	

Summary of IRG Freeze and Seize Responses

States and Territories responded to Question J5.14, *"Is the Freeze and Seize operation in your State centralized or automated?"* (as noted above). A summary of these responses is provided below:

Centralization: Out of 54 States and Territories, 46 responded regarding the centralization attribute; 57% indicate that they are centralized.

Automation: Out of 54 States and Territories, 44 responded regarding the automation attribute:
- 29% - Fully automated;
- 32% - Partially automated;
- 39% - Manual process

Correlation Between Centralization and Automation: Out of the 54 States and Territories, 40 States responded to both attributes:
- 50% Centralized; 50% Decentralized
- 23% Fully automated; 35% Partially automated; 42% Manual

Detailed breakdown of centralization and automation:
- 7% - Decentralized, Fully automated
- 12% - Decentralized, Partially automated
- 13% - Centralized, Manual
- 15% - Centralized, Fully automated
- 23% - Centralized, Partially automated
- 30% - Decentralized, Manual

Responses to another question from the IRG may be of interest to States and Territories. Question 5.2, *"What is the Minimum Amount That the Obligor Must be Delinquent Prior to Becoming Eligible for Freeze and Seize Action?"*
- 26% of States/Territories have no minimum delinquency thresholds.
- Another 26% of States/Territories have a threshold of $100 to $500.
- 24% of States/Territories have a minimum delinquent threshold of $1,000 to $2,500.
- One State has a $5,000 threshold.

Refer to the chart below:

Minimum Delinquent Amount Eligible for Freeze and Seize

$501 - $1,000
2%

> $5,000
2%

Tied to Support Order
9%

No Minimum
26%

No Response Provided
11%

$1,000 - 4,999
24%

$100 - $500
26%
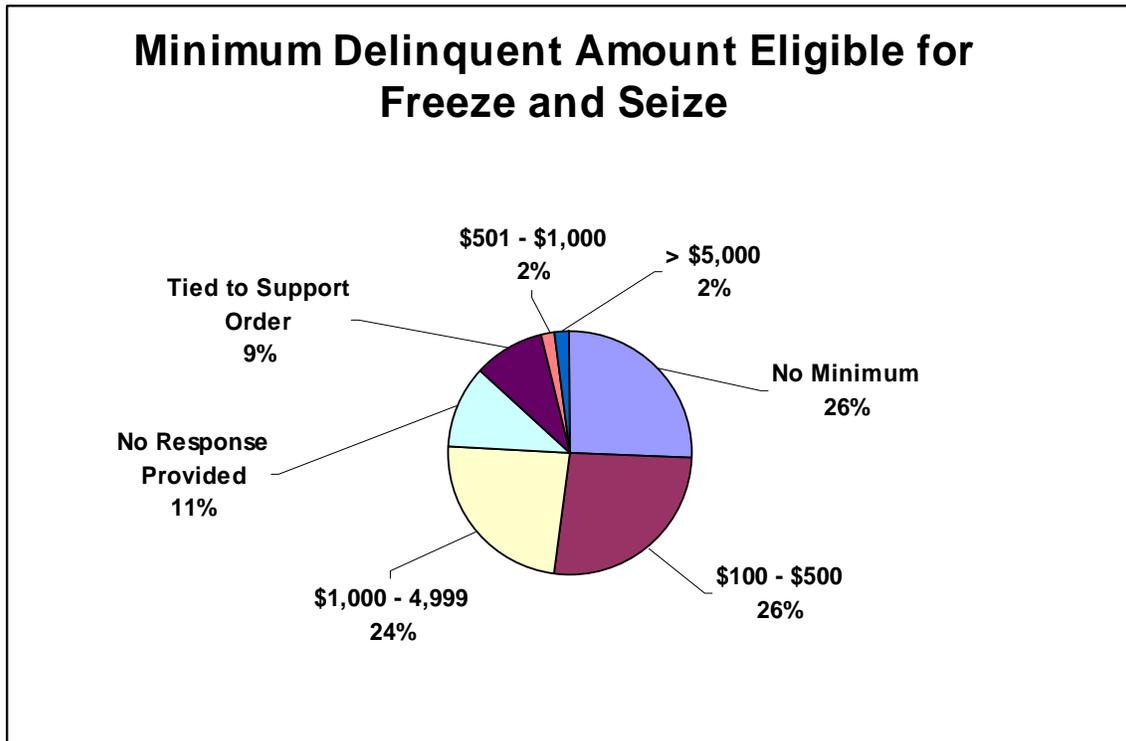
E. FIDM Process Automation Enhancement Metrics

The following metrics are candidates to be collected prior to, and following, the implementation of enhancement to FIDM in order to gauge effectiveness and support business case development. Before and after measurement is important to measure how the enhancements improve collections and to support development of a business case to garner necessary resources.

Potential FIDM Metrics

Statistic	Explanation	Prior to Automation	After Automation
Total FIDM in-state matches for year Total MSFIDM matches for year Total FIDM matches from a FIDM consortium Total FIDM matches in other States that permit direct levy	Matches compared to collections in these various categories may assist in determining whether they are cost-effective.		
Total FIDM collections by defined period	It is essential to know the bottom line amount that results from enhancing/implementing automation to support FIDM. Monthly or even yearly should suffice.		
Total settlement collections by defined period	It is essential to know the bottom line amount of settlements that result from enhancing/implementing automation to support FIDM. Monthly or even yearly should suffice.		
Percent of total collections that result from FIDM (levy and settlements) by defined period	It would be desirable to know if the actual FIDM collections are increasing or decreasing as a percentage of total collections.		
Average amount collected by case	It may prove valuable to know the actual amounts from each case that result from levy and settlement.		

Statistic	Explanation	Prior to Automation	After Automation
Total levy amount collected by region/local office	This metric should prove to be a good management tool to look for under-achieving regions/offices (note that capturing these numbers can then be used to derive many of the other collection statistics).		
Total settlement amount collected resulting from FIDM cases by region/local office	This metric should prove to be a good management tool to look for under-achieving regions/offices (note that capturing these numbers can then be used to derive many of the other collection statistics).		
OCSE 34A line 2d	Amount received as "assisting" State for AEI		
OCSE 34A line 2f	Amount received as initiating State in Interstate or AEI request		

Chapter IV: CASE STUDIES

Case Study: Florida

FIDM Automation

State of Florida
Department of Revenue, Child Support Services

State Profile

The following outlines some of Florida's child support program:

- Florida's caseload as of the end of FFY 2006 was 742,500, of which almost $5,480,000 were obligated. The annual collections for the same period were $1.25 million.

- DOR-CSE has 44 offices in 5 regions and two demonstration sites in Dade (SA) and Manatee (COC) counties. Thus, a total of 46 sites exist.

- DOR-CSE has 2,333 FTE across the 44 sites, the program office, and the systems support office. Dade has 417 FTE and Manatee has 53 FTE bringing the combined FTE to 2,803.

- DOR-CSE workers are organized by business process. Dade has a hybrid of this setup and Manatee is set up by function.

- Florida's statewide child support system is called the Florida On-line Recipient Integrated Data Access (FLORIDA). FLORIDA is a multi-program system that also includes Food Stamps, TANF and Medicaid. However, the Florida child support program is transitioning its system to a stand-alone system called the Child support enforcement Automated Management System (CAMS). CAMS has now taken over much of the enforcement processing, with some functions still not implemented. Other enforcement modules utilized by Florida are called ATLAS, CLIP, UCP, and CRA (tracking only). There are other support systems used in other core processes such as CADET, which is a database program designed to improve case audit time and reliability. Because of the plans to transition child support away from the FLORIDA system to CAMS, a decision was made to create a stand-alone FIDM system that would interface with FLORIDA.

Background

The Florida child support agency began its planning to implement FIDM by proposing State legislation in conjunction with the Florida Bankers Association (FBA), the Department of Revenue's proposed legislation for FIDM. In 1997, the State Legislature adopted FS 409.25656 and 409.25657 to comply with this Federal requirement with one significant difference: Florida law *requires* the Department to pay FIs a "*reasonable fee*" to conduct the data match and the Federal law *allows* such payment. The legislature also approved funding for 60 positions (OPS for the first year, converting to FTE in the second) for this and other welfare reform initiatives.

In July 1997, the FIDM process began operations as a part of the compliance enforcement process. Staff at that time consisted of one Revenue Program Administrator II and two OPS employees -- one Management Review Specialist and one Revenue Specialist II. Two distinct and large initiatives had to begin at the same time. First, negotiations had to begin with the FIs in order to get signed agreements to do the matching. Second, the Department had to develop and adopt policy and procedures in order for the program to operate.

The Department drafted procedures and began negotiations with what was then the State's largest FI -- Barnett Bank, which had agreed to be the first to conduct the match process. Florida found that a major stumbling block was not with the matching, but with the "agreement," which, at that time, was actually a standard State purchasing contract complete with 18 pages of boilerplate language. It took approximately six months and five attorneys between Barnett Bank and the Department to whittle down the 20+ page standard contract into the three-page Memorandum of Agreement (MOA) used today. A second obstacle was the merger between Barnett and NationsBank. The bank merger had the unexpected, but beneficial, result of the newly merged bank agreeing to waive the previously agreed-upon match fee for the initial match.

A database tracking system for the FIDM process was developed in Microsoft Access 97® in order to store and automate most of the actions that were conducted on a daily basis. The database was designed to screen match files returned from the institution and determine which of the matches appear eligible to freeze. After receiving the data, Florida decided to test its process using data from one region, and ten cases that had been hand picked. These cases were selected from the matched data, based on high arrearage balances where the account was solely owned by the child support obligor. Jacksonville region agreed to be the pilot region in the State to freeze bank accounts. The Program Office FIDM staff traveled to Jacksonville to conduct an in-depth review of the process and conduct training of the procedures for the test. The goal for the test was to validate the process and the forms Florida had developed, as well as determine the public's reaction to this new enforcement tool.

While refining the procedures, Jacksonville staff pointed out that, because of concern over the accuracy of the arrears balances, it was routine for audits to be completed on all cases prior to the initiation of this type of enforcement action. A study was conducted to

determine if the time involved doing audits was justified. A random sample of 100 cases was picked and audited by Jacksonville staff. Of these cases, it was determined that, on average, balances on FLORIDA are off by approximately 10 percent. It was then concluded that audits are largely unnecessary due to the fact that most debts pursued by FIDM action are over $5,000, while the average amount of funds retrieved from the action are less than $1,000. Based on these findings, management approved the test without the use of up-front audits.

The goal of Pilot Phase One was to give the Department a good idea of what could be expected out of the average case in the future. There were issues that Florida staff could not make decisions on without first testing for the outcome. For example, would freezing jointly owned accounts result in a higher contest rate? Or, would the State get more contests if it involved a checking account? Florida CSE staff had identified a few areas in our procedures that needed amending but, overall, they worked well enough to move into this phase. Florida began this pilot cautiously and monitored the activities daily. It wanted to insure that this phase didn't raise problems triggering the attention of the legislature or the media. The cases were selected using the obligated case file for the Jacksonville region, separated by case type. Then, the match file from NationsBank was sorted by case type and then alphabetically by the NCP name. One hundred cases were then selected by flagging the appropriate percentage according to case type. As an example, if the obligated case file had shown that Jacksonville had a total of 5,000 case type 01 and 12,000 case type 06 (roughly 30 percent and 70 percent respectively), and the match file had 350 type 01's and 1,450 type 06's, every twelfth type 01 case and every twenty-first type 06 case was selected so that cases were as representative as possible of all Jacksonville cases. Once selected, the cases were screened according to the procedures and the appropriate levy action taken.

The State proposed some legislative amendments to its State law that would enhance the productivity of the FIDM program. First was the ability to allow Method One matching or the "All Account" method. This resulted from several requests from smaller FIs that did not have the computing capacity to match their outbound file against their account holders. In many cases, these FIs had fewer than 1000 account holders, while the State's outbound file contained over 270,000 NCPs. Second, they requested the ability of the NCP to allow us an "early levy" on their account. During the pilot, Florida had several requests from NCPs to "go ahead and take the money and release my account." The law was specific as to the time frames required and the agency was prohibited from levying an account before the 31st day of the freeze. This change has been very well received and Florida has processed hundreds of "Consent to Early Levy" forms, allowing the Department to finish that action and move on to others. In the fall of 1998, work began again to redraft Florida procedures to incorporate all the things learned from the test and Pilot Phase One. Florida developed a plan to rollout FIDM on a statewide basis beginning in January 1999. Meetings were scheduled with members of the Florida Banker's Association (FBA), the Florida Credit Union League (FCUL), and the Florida Department of Banking and Finance (DBF) to discuss the statewide rollout plan. Press releases were drafted and published in both the FBA and FCUL quarterly newsletters to keep the FIs advised of the Department's progress in implementing the FIDM Program.

In August, a Memorandum of Agreement (MOA) was mailed to each of the State's FIs. In December, a "Train the Trainers" meeting was held in the Tampa regional offices with representatives from each region as well as Dade and Manatee counties. Program office staff made final preparations for the statewide rollout, known as Pilot Phase Two.

Pilot Phase Two was an active waiting period. All of the FIs that had signed MOAs were scheduled to receive their first inquiry file during the first calendar quarter of 1999. Match data began trickling in during March and the program began gearing up as this data was received. So while Florida awaited new data, staff continued to work with the old data from the original NationsBank match. This gave all of the freshly trained statewide FIDM staff a chance to start slowly and become familiar with the procedures they had just been taught. Florida officially terminated Pilot Phase Two at the end of the State fiscal year (June 30, 1999).

At that time, the Department's FIDM program was in full production. There were no limits on the number of actions Florida could initiate, as long as staff had data to support the work. The first full year of production we collected approximately $2.7 million. In August 1999, the multi-state provision from OCSE came online and Florida began getting data from some of the larger institutions.

In September 1999, Florida hired a vendor to begin co-development of an enhanced automated tracking system in order to boost productivity and allow expansion for the future. The ATLAS program (Automated Tracking of Levy Actions Statewide) was implemented in April of 2000 and is currently in use. While ATLAS was designed primarily for the FIDM process, it was modified to contain modules to process and track actions for the Lottery Intercept program and Personal Property Liens.

Business Process

Every FI (those that only do business in Florida and those FIs that do business in more than one State that have elected not to participate in MSFIDM) is sent an MOA. The MOA allows the FI to choose its match method, select the media type to receive and return, declare the estimated costs to be reimbursed (up to the maximum allowed), provide contact information, and provide a selected match week for each quarter.

Automation Process

Each week, an extract (formatted to the National Data Specifications Handbook for FIDM) is made from the FLORIDA system using the same criteria as the IRS Tax Offset. Any obligor that has a delinquency of $150 or more for public assistance cases, or $500 or more for non-public assistance cases, meets the inquiry file criteria regardless of payment history or status. Since Florida's matching law *requires the child support agency* to pay FIs for conducting the match, the State wants to get as much information as possible for the money it spends. Any information it receives on an obligor that does not meet the freeze criteria is placed in a separate database that can be used by enforcement personnel for location purposes.

Florida's bank match process is conducted by uploading the weekly file to the FIDM server for creating the required media to be sent out and for uploading to the secure Internet file exchange site. The programmer makes the required number of copies for 3480/3490, 9-Track, and CDROM media. The media is then mailed to Florida's FI(s). They in turn match this extract against their account holders and return a match file (via tape, CD-ROM, or to the secure website) of account holders to delinquent obligors (Method Two). However, some of Florida's institutions simply send their entire account holders listing to Florida to match themselves (Method One). Once the information is received, it is loaded onto the FIDM unit server to be imported. A process similar to Method Two (using the tax-offset file) is conducted by OCSE for all FIs that have elected to be "multi-state." These multi-state matches are routed back to each State from OCSE by a FIPS code that is contained on the file.

During the import process, matched records are filtered to screen out all non-eligible obligors. For all obligors who meet the filtering criteria, a final manual check is done through the FLORIDA system to ensure all qualifying cases remain in a past due status. If so, a Notice of Freeze is generated and issued to the custodian of assets (FI) requesting that a hold be placed on the obligor's account(s) for all monies available, up to the amount of past due child support owed. The FI places a "freeze" on the account(s) belonging to the obligor for 60 days. The obligor is then notified of his/her due process rights. Once all appeal periods are exhausted, a Notice of Levy is generated and sent to the FI. Available funds are remitted by the FI and forwarded for processing and distribution according to guidelines.

What Is ATLAS?

AUTOMATED **T**RACKING of **L**EVY **A**CTIONS **S**TATEWIDE

ATLAS is a PC based, fully relational database application designed by the Compliance Process FIDM team. It allows tracking of all FIDM related activity, which includes FI information, tracking match send and receive dates, purchase orders (POs) issued, open balances on POs and contact information. ATLAS reads the bank match file returned to Florida and applies preset criteria to determine which accounts are eligible to freeze. If approved, a worker merely sets the match status to "In Process" and the computer prints the appropriate forms and tracks activities associated with the action during the 60-day freeze/seize period.

The second phase of ATLAS development saw the inclusion of the lottery intercept process. Now, all lottery actions are tracked with the same reliability as the FIDM actions. This enhancement has greatly improved Florida's ability to track funds from lottery winnings that are owed to custodial parents.

The third phase of ATLAS included Florida's Liens process. In the past, program office workers would take a monthly extract of DL suspensions from the obligated cases file and manually look up the NCP on the DHSMV screen to see if he/she owns an asset that

qualifies for a lien. ATLAS was programmed to accept a monthly tape exchange of DHSMV transactions, compare that to the obligated data, apply filtering criteria and produce a list of NCPs and their assets that are eligible for liens. The system then generates all necessary documentation to place the lien and track the actions while they are in effect. This process improvement has more than doubled current production and increased the accuracy of the child support agencies' actions.

FIDM and LEVIES

DATA MATCHING

ATLAS tracks all necessary information in order to conduct data matching for the FIDM process. A print routine is built-in for the operator to select the match week needed and then generate the required notice(s) accordingly.

For those FIs that elected to perform the All Accounts Method (Method One), a reminder letter (see Attachment A) is mailed to the FI two weeks prior to the required account listing date. Once the media is received, it is matched with the current Obligated Cases File (which is extracted from the FLORIDA system) and all eligible matches are written to the ATLAS database tables. Any matches that are made where the obligor is not eligible for levy action are written to the "B" Records table for retention and future use.

For all FIs that elected to perform the Matched Accounts Method (Method Two), an inquiry file and cover letter (see Attachment B) is prepared and mailed two weeks prior to the FIs selected match week. The FI has 30 days to complete the match and return the match file to us. Once returned, the files are read and transferred onto the FIDM Program Office Unit server. The data is then run through an import routine (similar to Method One) to load it into the ATLAS database tables.

Multi-state match information is retrieved from the FLORIDA system and loaded onto ATLAS similar to Method Two. Since multiple FIs can exist on one MSFIDM file, ATLAS generates a report that lists the FI name and the number of match records for that MSFI. If an MSFI is not listed in the database, ATLAS adds the FI to the database during the import. The match file is then re-imported and only the records from the new FI will be added. Because of the varying ways of interpreting law from State to State, ATLAS assumes that all MSFI's will accept direct levies. If it has been determined by the MSFI that they will not accept levies from Florida, the MSFI notifies the State in writing of their position. At that time, ATLAS de-selects the "Accepts Direct Levies" box from the MSFI data record, which will prevent future mailings of notices to that MSFI. When processing match files, the data is run through an import routine that loads it into the ATLAS module where all matched account data is stored and maintained. All account information is then filtered according to internal policy/procedures for Florida's FIDM program (see 'Filtering Criteria' below) to screen out all non-eligible obligors' account information. Account information that does not meet the filtering criteria is stored in a separate data structure in the ATLAS directory. The remaining filtered data is loaded into ATLAS and then coded as a "New Match" so it can be quickly recognized

and reviewed to determine whether a freeze and seize action is warranted. Location information is extracted from the match records daily and then uploaded into the FLORIDA system to be processed as a location effort. In addition, all levy activity is compiled into a file and uploaded to FLORIDA. This information is used to update the case history and TRAC information about pending FIDM actions (see Attachment C).

Filtering Criteria

Florida has decided to use the FIDM process as a tool for those cases that have not been able to be collected by normal methods. While Florida statute allows the State to go after anyone with any amount of delinquency, the State decided on certain limits for the FIDM program. Over time, Florida will have the option of changing its selection criteria to meet the program needs at that time. The following selection information is done in a two-step process. An initial threshold is applied by the ATLAS Module and determines whether or not a case is established in the levy tracking system. Florida child support levy workers do the second level as they are reviewing the case for freeze eligibility.

Level One (ATLAS Module) Criteria

- No payment from the obligor for more than 60 days
- Sole account or joint account for which the obligor is the primary owner
- The account is not a trust account (Trust_fund_indicator = 0), or the account info is not available (Trust_fund_indicator = 6).
- Payee Last Name Control match flag = 0 or 1 (unable to provide or matched).
- Account Balance
  In State FI:
  Joint Primary or Sole: >= $30 *where* position 361 = 1 OR 2.
  Joint Primary or Sole: All records *where* position 361 = 0 AND position 381-382 <> 04.
  MS FI:
  Joint Primary or Sole: >= $30 *where* position 458 = 1 OR 2.
  Joint Primary or Sole: All records *where* position 458 = 0 AND position 467-468 <> 04.

Level Two (FIDM Levy Worker)

- Case must be open
- NCP is not on TANF
- NCP is not on SSI
- NCP is not listed as violent
- Total delinquency must be greater than or equal to two times the monthly obligation and equal to or greater than $600
- NCP paid less than 75 percent of total obligation in last 3 months
- Case is not a PA Arrears (Retroactive) only case established after 03/23/1993
- Initial order is more than 6 months old

- If previous FIDM action, must be more than 6 months ago
- No currently ongoing enforcement action that would cause conflicting jurisdiction

REVIEWING MATCHES

While reviewing a new match, if it is determined that action should be taken, the levy worker changes the status in the database to "Region Review" so it can be transferred to the regional service sites. Each day, a file is generated and placed onto a shared drive that can be accessed by the regional FIDM workers. The regional workers review the case to insure that the case is eligible for action and that no other enforcement action is pending before beginning the FIDM action. After review, the regional staff will notify the program office levy staff as to the disposition of the case. If the case should not be frozen, it will be coded as "Not Pursued" with an appropriate reason code.

If the match is pursuable, the match will be coded as "In Process" in order to generate a Notice of Freeze to the FI from which the match was received. Seven days later, a Notice of Intent to Levy is mailed to the obligor that describes his/her rights to contest the levy action. If the obligor contests, a Notice of Extension is mailed to the FI instructing them to hold the funds indefinitely. Upon the successful completion of the rights period (or contest if it was filed), a Notice of Levy is generated to the FI requesting that the funds in the account be sent to the State.

The database stores all necessary information used to track the freeze period, notice generation, due process periods, contest information, as well as levy and settlement collections. A management collection report can be run at any time to get an up to the moment view of FIDM case information (See Attachment D). The system also tracks related actions generated as a direct result of the freeze and seize actions such as 1) Was this the first ever collection on this case? 2) Was an Income Deduction Order established? 3) Was the collection enough to pay off and close the case?

Other queries and reports can be generated from a linked management database to provide information on records that are stored in the ATLAS Module. Each morning, a program rollup report (see Attachment E) and a levy worker exception report (see Attachment F) is printed giving the levy supervisor and workers a snapshot of their production / workload as well as any overdue activities they need to address. Other reports are either preprogrammed or can be generated on an ad-hoc basis as needed. In addition, monthly production reports are generated for program office and regional office use.

ATTACHMENT A

(FI Name)
(FI Address)
(FI City), (FI State) (FI Zip)

PO Number: (PO Number)

RE: FI Data Match

It is time for you to send your account holder database to us for the Quarterly Florida FI Data Match process. It is to be formatted in accordance with the National Financial Data Match Specifications Handbook – Method One: Inquiry Files. By doing so you are in compliance with the Federal PRWORA Act of 1996 and Florida Law.
This file must contain all open accounts maintained by the institution including accounts not normally considered for 1099 reporting.

Please create and return your file (on 9 Track*, 3480/3490*, Diskette, or CD-ROM) to us no later than (Date of letter +30).

The following information must be returned on your match tape:
" A " Record – FI Record. " B " Record(s) – Account Information Record. " T "Record – Totals Record.

1. Be sure to include an "A" in position 371 in the "A" Record (all open/active accounts must be returned each quarter).
2. Please verify that all fields are filled out completely.
3. Please return your media to the address below.

Sincerely,
Martin Ehlen
FIDM Match Manager-DOR/CSE
4070 Esplanade Way, Room 260P
Tallahassee, FL 32399-3150
(850) 487-6790 ehlenm@dor.State.fl.us

*NOTE: For 9-Track Reels or 3480/3490 cartridges please indicate the following on the label of the EBCDIC tape:
Record Format (RECFM) – Specifies the format and characteristics of the data set.
Blocksize (BLKSIZE) – Size in bytes for the largest block to be processed.
Logical Record Length (LRECL) – Length in bytes of the logical records in the data set.
Record Count
Contact Name and phone number

ATTACHMENT B

To: (FI Name)
PO Number: (PO Number)

RE: FI Data Match

Enclosed is a (Media Type Description) in ASCII text format containing a confidential database of delinquent non-custodial parents that is to be matched against your account holder database for a quarterly FI Data Match (FIDM). The data is formatted in accordance with the Financial Data Match Specifications Handbook – Method Two. Mainframe environment should select delimited, fixed length records with carriage return; others select non-delimited, fixed length records with no carriage return.

This file must be matched against all open accounts maintained by the institution including accounts not normally considered for 1099 reporting.

Please run the match and return your Match File (on CD-ROM or Diskette or Tape) to us no later than (Date of letter +30).

4. Be sure to include an "M" in position 371 in the "A" Record.
5. Please verify that all fields are filled out completely.
6. If no matches are found send an "A" and "T" Record along with a Transmittal report.
7. Please return all media to the address below.

Sincerely,

Martin Ehlen
FIDM Match Manager-DOR/CSE
4070 Esplanade Way, Room 260P
Tallahassee, FL 32399-3150
(850) 487-6790 ehlenm@dor.State.fl.us

ATTACHMENT C

Address Updates

111111111THOMAS TOZIER	49 SARATOGA AVE	BANGOR	ME044014224
222222222WRIGHT JIM A	21 BROOKDALE AVE	BLOOMFIELD	CT060023303
333333333LITTMON CAM D	40 JUDSON AVE EAST	HARTFORD	CT061181508

Information is processed as a normal data exchange. If address is already on system, it is discarded.
If not, system checks to see if the address flag for known bad is active.
If so, system sends alert to worker, if not, system stores in history.

TRAC (ACTIVITY) UPDATES

```
012345678876543210ENFDM30FIDM-Sent Freeze 120820032167
123456789987654321ENFDM41FIDM-Sent Intent 120820032805
234567890098765432ENFDM41FIDM-Sent Intent 120820032874
345678901109876543ENFDM45FIDM Levy Contest 120820032307
111552222444886666ENFDM61FIDM-Full Release 120820032899
789456123147258369ENFDM51FIDM-Part Release 120820032481
741852963147258963ENFDM59FIDM-Sent Levy 120820032697
465132798978645312ENFDM60FIDM Levy Complete120820031922
555667777888776666LIVEH10LIEN REQUESTED 1208200300041795
111223333444556666LIVEH12LIEN NOT-TO NCP 1208200300041795
444556666777889999LIVEH99LIEN COMPLETE 1208200300035266
T11
```

This data is displayed on each case and is written to history.
File Layout:

NCP_SSN	9
CP_SSN	9
TRAC CODE	7
MESSAGE	18
DATE	8
FI #	8

Financial Institution Data Match

Management Report For The Period 04/24/2007 - 04/30/2007

Levy Statistics	WTD	MTD	FY TD	LIFE TD*
Number of Notices of Freeze Sent	247	780	6449	54445
Amount Requested to Be Frozen	$3,904,800.09	$11,466,805.35	$109,302,513.23	$748,075,318.18
Number of Freeze Implemented	37	356	4020	39496
Amount Frozen By Financial Institution	$35,423.13	$292,939.77	$3,426,067.60	$28,852,717.07
Number of Levies Issued	188	642	4298	39181
Number of Levies Collected**	195	690	3729	37894
Amount Collected From Levies	$165,158.87	$690,850.48	$3,274,755.91	$25,894,618.93
Amount Collected From Settlements	$1,000.00	$40,066.67	$259,007.75	$5,310,999.13
Total Amount Collected	$166,158.87	$730,917.15	$3,533,763.66	$31,205,618.07
Total Contests Filed - Circuit Court	0	6	49	578
Lost - Circuit Court	0	0	2	59
Total Contests Filed - Chapter 120	3	11	77	688
Lost – Chapter 120	0	0	2	28

* Includes data from Pilot Phase One and Pilot Phase Two
** The following statistics are related to levy collections:
    (1) 3.14% (1191 cases) received their first ever collection,
    (2) 1.55% (589 cases) had an IDO established,
    (3) 1.20% (454 cases) have been closed,
    (4) 0.11% (40 cases) have received a Stipulated Agreement, and
    (5) 1.66% (629 cases) have been brought current by collection.

F.I. Statistics	WTD	MTD	FY TD
Match Files Sent	69	214	1708
Costs Incumbered	$3,368.20	$17,918.20	$131,777.80
Method 1 Match Files Received	8	15	101
Method 1 Match Costs Paid	$.00	$150.00	$1,375.00
Method 2 Match Files Received	25	172	1575
Method 2 Match Costs Paid	$1,250.00	$10,572.20	$95,381.31
Multi-State Match File Imported	75	290	3031
Multi-State Match Costs Paid	$.00	$.00	$300.00
Financial Institutions Added to ATLAS	0	4	35
Financial Institutions Taken Out of Service	0	0	1
Active Financial Institutions - Method 1	30		
Active Financial Institutions - Method 2	466		
Active Financial Institutions - Method 3	962		

ATTACHMENT E

Region and Worker Reports

May 07, 2007

Current Region Stats

REGION	NEW MATCH	REG REVIEW	HOLD	PENDING	IN PROCESS	EXTEND	COMPLETE	N PURSUE	TOTAL
DADE COUNTY	92	2051			1	13	2	4427	6586
MANATEE COUNTY	79	111	23		30	5	34	870	1152
REGION 1-CENTRAL	100	310			10	2	92	1751	2266
REGION 1-EAST	59	163			72	5	290	1320	1909
REGION 1-WEST	92	616	1		76	13	638	3048	4484
REGION 2-NORTH	196	905	7	1	400	12	579	4115	6218
REGION 2-SOUTH	227	405	2		130	9	159	1365	2297
REGION 3-CENTRAL	281	678	8		194	10	319	3215	4705
REGION 3-NORTH	145	81			138	8	143	1183	1698
REGION 3-WEST	233	543	14		122	3	160	2200	3277
REGION 4-CENTRAL	212	705	3		112	10	204	3223	4469
REGION 4-NORTH	135	340	12		196	10	334	2412	3439
REGION 4-SOUTH	198	422	11		177	7	305	2306	3426
REGION 5-BROWARD	367	807	3		216	21	415	2622	4451
REGION 5-FT MYERS	126	198			9	8	127	1011	1479
REGION 5-NAPLES	94	240	4		74	6	108	1046	1572
REGION 5-PALM BEACH	30	350	1		162	37	748	2178	3506

Current Worker Stats

USER	NEW MATCH	REVIEW	HOLD	PENDING	IN PROCESS	EXTENDED	COMPLETED	N PURSUED	TOTAL
bradyj	655	1865	30	1	782	37	1345	9998	14716
DAVISI	281	1439	2		320	57	1768	8410	12278
ERBYD	910	3455	28		515	56	747	10068	15779
TURNERMO	820	2166	29		502	29	797	9817	14162

Note: Not Pursued totals do not include cases moved due to "In RR > 45 days".

Current FIDM Exception Stats

	Freeze Greater Than 50 Days	Incorrect Case Status	FI Notice Over 20d	30d	Overdue NOIL Mailing	Freeze Verification > 20 Days Old	New Matches > 20 Days
bradyj		18	18	119		76	
DAVISI	6	6	6	44		21	
ERBYD	5	866	10	68		39	
TURNERMO	3	18	37	162		22	

Unclaimed Property Stats

Active Claims	# Active	Claim $	Completed Description	# Completed	Completed $
NEW MATCH	6	$974.83	FULL INTERCEPT	2436	$596,965.35
IN PROCESS	83	$17,698.50	PARTIAL INTERCEPT	318	$131,703.29
EXTENDED	12	$4,681.75	RELEASED	97	$0.00
FINAL ORDER	176	$40,507.04			

Not Pursued Reason	#	Released $			
BANKRUPTCY	7	$1,330.62	CASE NOT OPEN	27	$5,497.08
DOES NOT MEET	642	$200,092.04	NOT DELINQUENT	28	$7,194.05
OTHER (SEE NOTES)	82	$26,220.00	TANF / SSI RECIPIENT	27	$5,152.53
VIOLENT INDICATOR	1	$100.84	WRONG PERSON	12	$2,592.36

ATTACHMENT F

WORKER EXCEPTION REPORTS

Report For: Jennifer Brady

50th Day Report

NCP_SSN	CONTROL #	NCP_NAME	FREEZE DATE	DATE FROZEN	50TH DAY
	2429097		03/16/2007	03/20/2007	05/09/2007
	2429858		03/20/2007		05/09/2007
	2429180		03/16/2007	03/20/2007	05/09/2007

Levy > 20 Days Old Report

Control #	NCP_SSN	NCP Name	FI NAME / LEVY CONTACT	PHONE
		THIS LEVY IS OVER 30 DAYS OLD. PLEASE CONTACT THE FINANCIAL INSTITUTION.		
2401573			NAVY FEDERAL CREDIT UNION	
Levy Mailed On: 12/04/2006	Days Old: 154		MAUREEN HOUTCHEN	
		THIS LEVY IS OVER 30 DAYS OLD. PLEASE CONTACT THE FINANCIAL INSTITUTION.		
2391326			CENTRAL FLORIDA EDUCATORS FCU	
Levy Mailed On: 12/12/2006	Days Old: 146			
		THIS LEVY IS OVER 30 DAYS OLD. PLEASE CONTACT THE FINANCIAL INSTITUTION.		
2401366			NAVY FEDERAL CREDIT UNION	
Levy Mailed On: 12/19/2006	Days Old: 139		MAUREEN HOUTCHEN	703-206-4763
		THIS LEVY IS OVER 30 DAYS OLD. PLEASE CONTACT THE FINANCIAL INSTITUTION.		
2405342			CENTRAL FLORIDA EDUCATORS FCU	
Levy Mailed On: 12/19/2006	Days Old: 139			

Freeze Verification > 20 Days Report

Control #	NCP SSN	NCP Name	FI NAME / LEVY CONTACT	PHONE
2431529			ARMED FORCES BANK NA	
Freeze Date: 03/29/2007	Days Old: 39		MSFIDM CONTACT	
Freeze Date: 03/29/2007	Days Old: 39		MSFIDM CONTACT	
2431207			CHASE MANHATTAN BANK	
Freeze Date: 03/29/2007	Days Old: 39		MSFIDM CONTACT	
2440100			MORGAN STANLEY DEAN WITTER LIQUID A	
Freeze Date: 04/16/2007	Days Old: 21		Jetaime Crisden	267-321-3588
2437970			WACHOVIA BANK NA	
Freeze Date: 04/16/2007	Days Old: 21		Jetaime Crisden	267-321-3588
2437583			WACHOVIA BANK NA	

Collections Report

Levy $	Settlement $	TOTAL
$4,413,726.39	$630,939.65	$5,044,666.04

Process Flowchart

The following set of diagrams documents the current FIDM process using ATLAS.

Financial Institution Data Match Process Flow Mapping

Agreements

Process Start → CSE enters Florida F.I. information → Memorandum Of Agreement (MOA) is produced and mailed

Actions performed at the regional level are shaded.

System records MOA mailing date

Financial Institution sends letter requesting exemption from program.

Financial Institution returns MOA

Determine what information is needed. Request from FI

CSE worker checks boxes where data is received

System updates date field on selected item(s)

MOA Complete?

Quarterly match fee =$0?

Extension Requested?

"Dummy" P.O. number is assigned to FI for this fiscal year.

Requisition report is generated using defined dollar "buckets" (table)

Meets Florida F.I. criteria?

CSE agrees with extension

Reports are sent to Operational Accounting for SAMAS input

P.O. copy returned to FIDM unit – # entered into tracking system

FI Status="Exempt" **Process Stop**

FI status="On Hold".

To Data Exchange

Status Cleared?

Financial Institution Data Match Process Flow Mapping

Data Exchange

Data Exchange

FLORIDA system produces extract file for FIDM Process (replica of Tax Offset Data)

Data sent to MSFIDM via Connect Direct

FPLS performs match and returns data to FLORIDA system via Connect Direct

Create 9 track and 3480/90 media to send to P.O. for

FI runs match and returns matched data

Systems places ASCII file on FIDM Program Office server

Tapes / Disks are logged &
Data Exchange Database
mailed to F.I.

Tapes / Disks are returned, logged
Data Exchange Database
and sent to be read

3480/90 or 9 track tape

P.O. creates needed number of CD ROM and/or 3.5" diskettes.

3.5" Disk
or
CD-ROM

FLORIDA system reads matched data and produces ASCII output for Data Exchange Database

Matched records are merged into table
Data Exchange Database

P.O. loads import routine for CD ROM or 3.5" diskettes - output loaded to Data Exchange Database

Comptroller Data?

No

Matches screened against levy criteria*

*Note: Screening criteria is contained in Procedures Document.

Yes

To Comptroller

Matched data loaded into ATLAS System

To Freeze Action

Financial Institution Data Match Process Flow Mapping

Freeze Actions

Freeze Action

PO worker has 30 days to review new matches

Case meets screening criteria?

No → This case ineligible **STOP**

Yes

PO worker sends case information to region for review

Case approved by region?

No → (back to This case ineligible STOP)

Yes

Add override code (08) to case

Vendor Case?

No →

Yes

Detag case per procedures

Note: Actions performed at the regional level are shaded.

Generate *Notice of Freeze (NOF)* - send to Financial Institution

Concurrent Processes

7 day waiting period from *NOF* mail date

file copies - update IICM and levy tracking system (LTS)

Generate *Notice of Intent to Levy (NOIL)* mail to NCP last known address on FLORIDA

File copies - update IICM and levy tracking system (LTS)

Wait for NCP return receipt and file. 21 day contest period begins

Receive freeze verification?

Yes → Process continues

No → Contact FI to determine reason - correct if possible

NCP contacts region?

Yes → (to Contact FI to determine reason - correct if possible)

No

Joint Owner contacts region?

Yes →

No

NCP contests?

Yes →

No → To No Contest

To NCP Contest

To Joint Contest

To NCP Contact

Financial Institution Data Match Process Flow Mapping
No Contest

No Contest

Is today > 30 days from date frozen?

No

NCP signed Consent to early levy?

No

Yes

Is today >30 days from issuance of NOIL?

Yes

To Levy Action

Yes

Does delq. still exist?

No

Yes

Levy Unit contacts Region to discuss case specifics

No

Region concurs with levy action?

Yes

Region sends Levy Action Transmittal (LAT) for full release

No

Agreement Reached?

Yes

To Levy Action

PO levy worker sends full release to financial institution
Process Stop

Financial Institution Data Match Process Flow Mapping
NCP Contacts or Contests

NCP Contests

NCP Contacts

NCP Does Not Contact Region; Makes Decision To Go With...

NCP Contacts Levy Coordinator / RS II. Discuss Settlement vs. Hearing Options; Makes Decision To Go With...

Administrative Process

May be Concurrent processes

Settlement Process (CSE)

May be concurrent processes

Circuit Court Process

NCP files request with CSE Deputy Clerk who logs receipt & notifies Levy Unit

Levy Unit sends *Notice Of Extension (NOE)* to FI

CSE (PO) Attorney assigned to case

RS II meets with NCP (and joint onwer if nec.) to discuss case specifics, uncover other information

NCP files for hearing in court; sends notification to CSE

L.C. Notifies Levy Unit who sends *Notice Of Extension (NOE)* to FI

Settlement Reached? — No

Yes

Is claim material fact? — No

DOR/CSE conducts Informal Hearing. Agency issues final order

L.C. refers case to LSP and gives copies of all relevant documents

RM Accepts? — No

Yes

LSP represents CSE at hearing (RS II or appropriate worker may also attend)

Case referred to DOAH

D.C. notifies NCP and Levy Unit of outcome

L.C. Notifies Levy Unit of Settlement Agreement

Judge issues order - LSP notifies L.C. - who notifies Levy Unit of outcome

DOAH conducts formal hearing - issues recommended order

Agency issues final order

Wait 30 days for appeal period

Wait 30 days for appeal period

To Levy Action

To No Contest

To NCP Contests

To Joint Owner Contests

Financial Institution Data Match Process Flow Mapping

Joint Contests
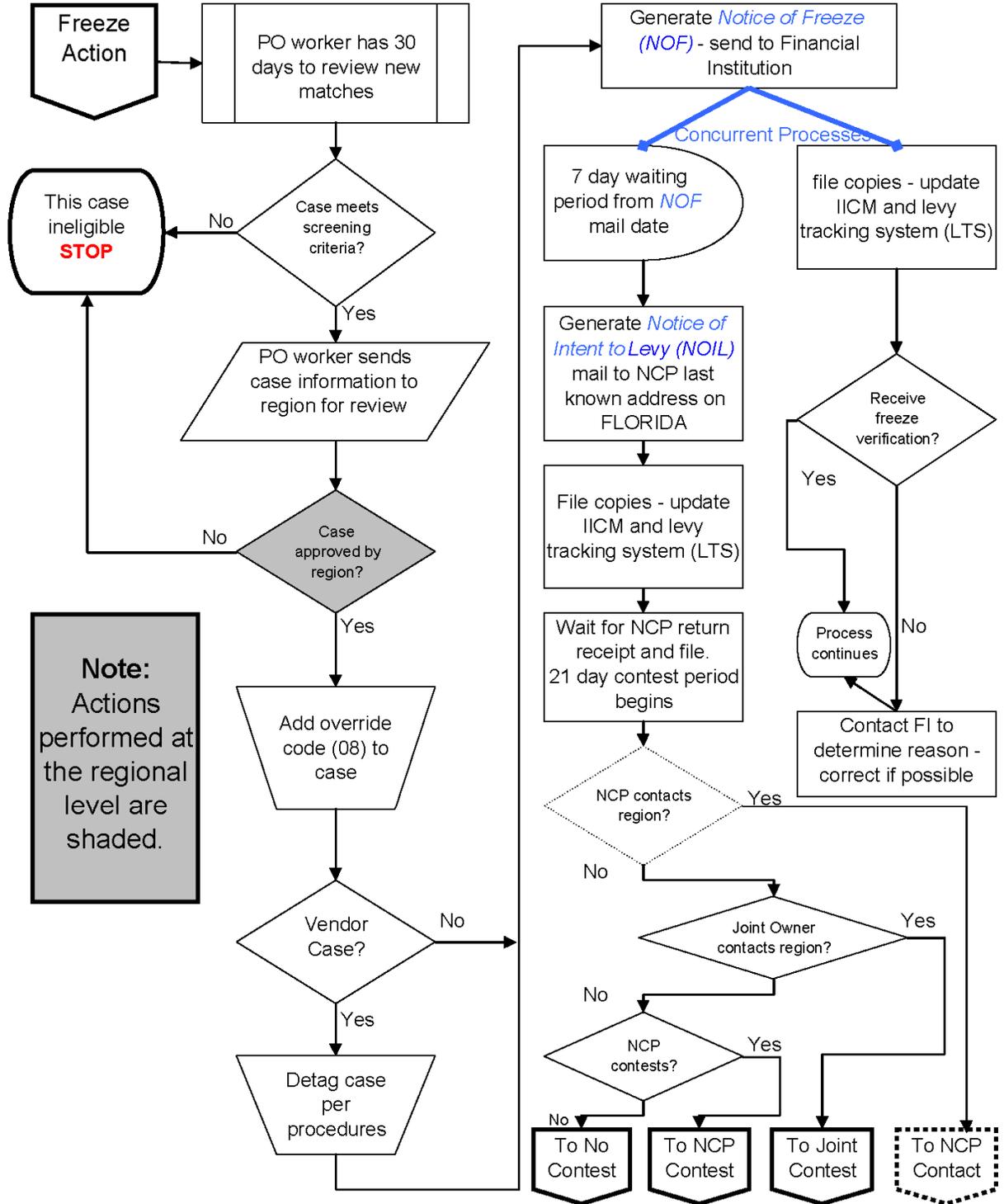
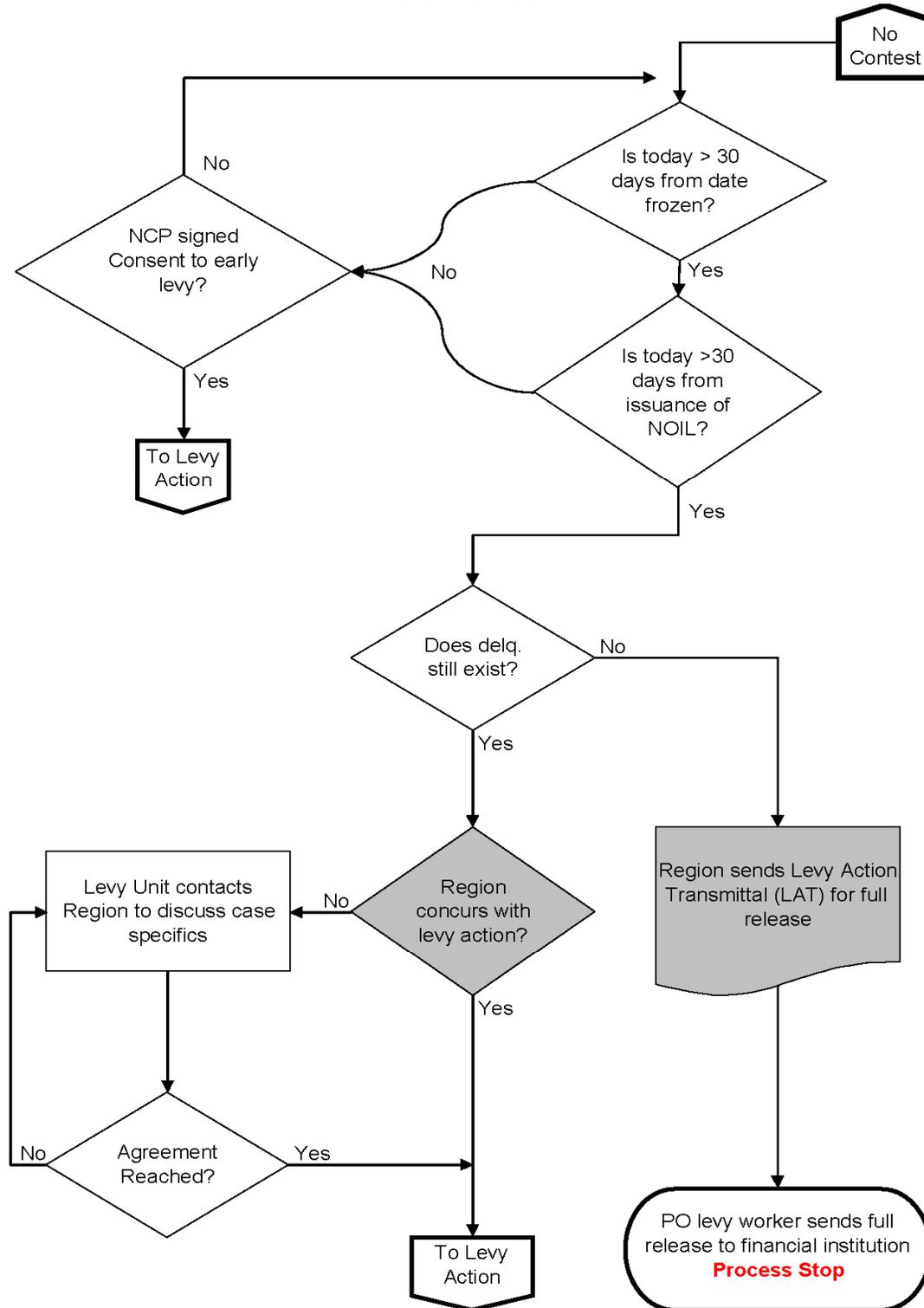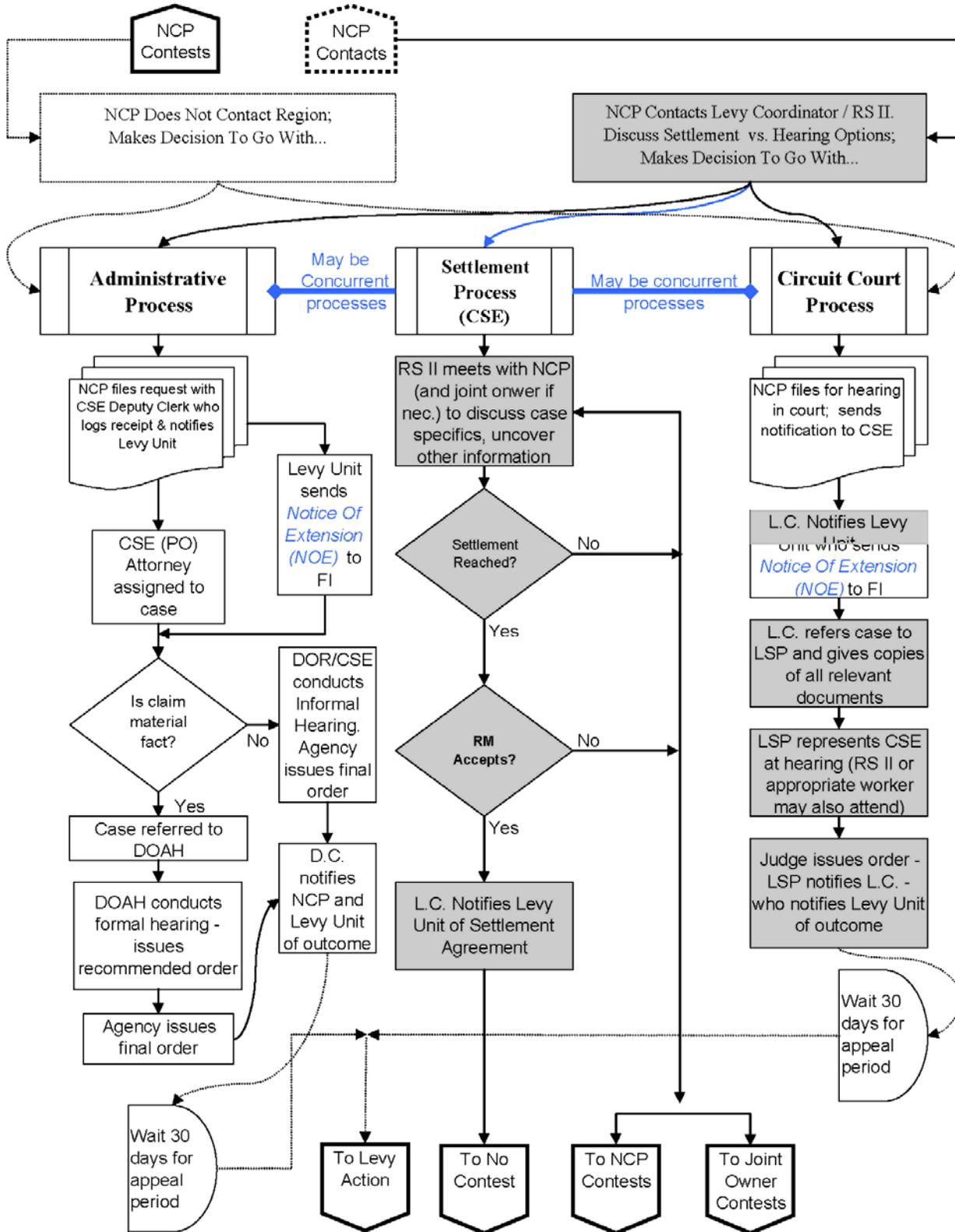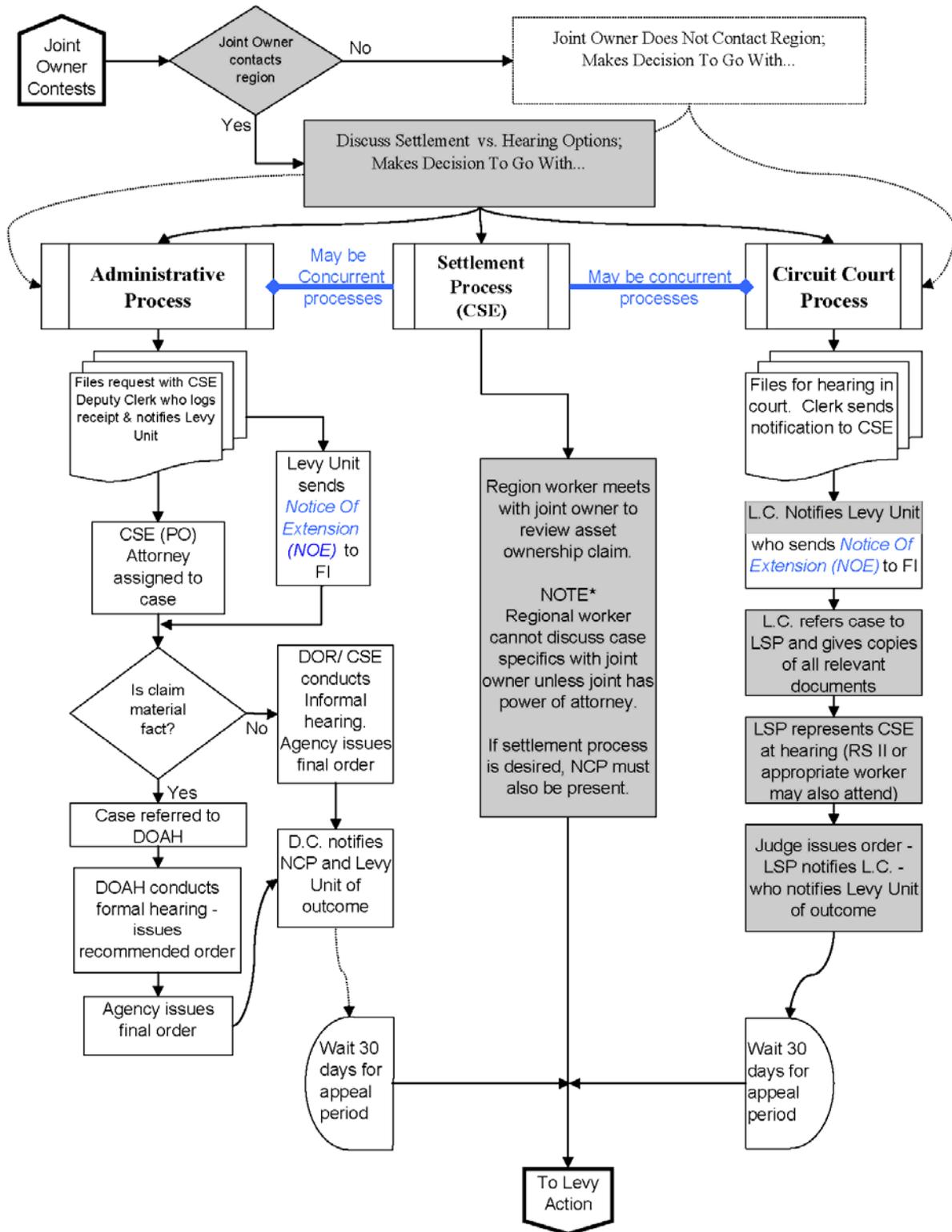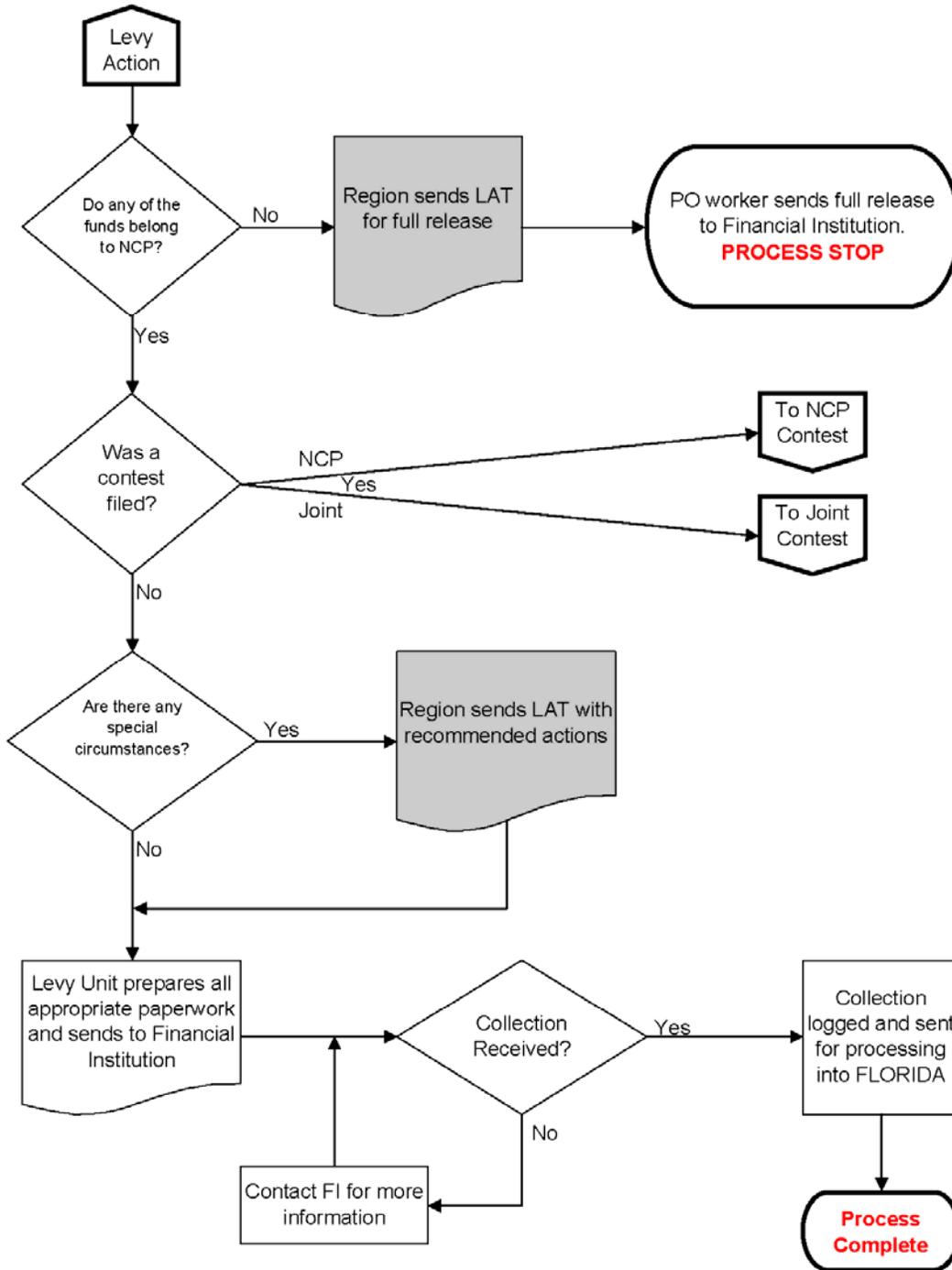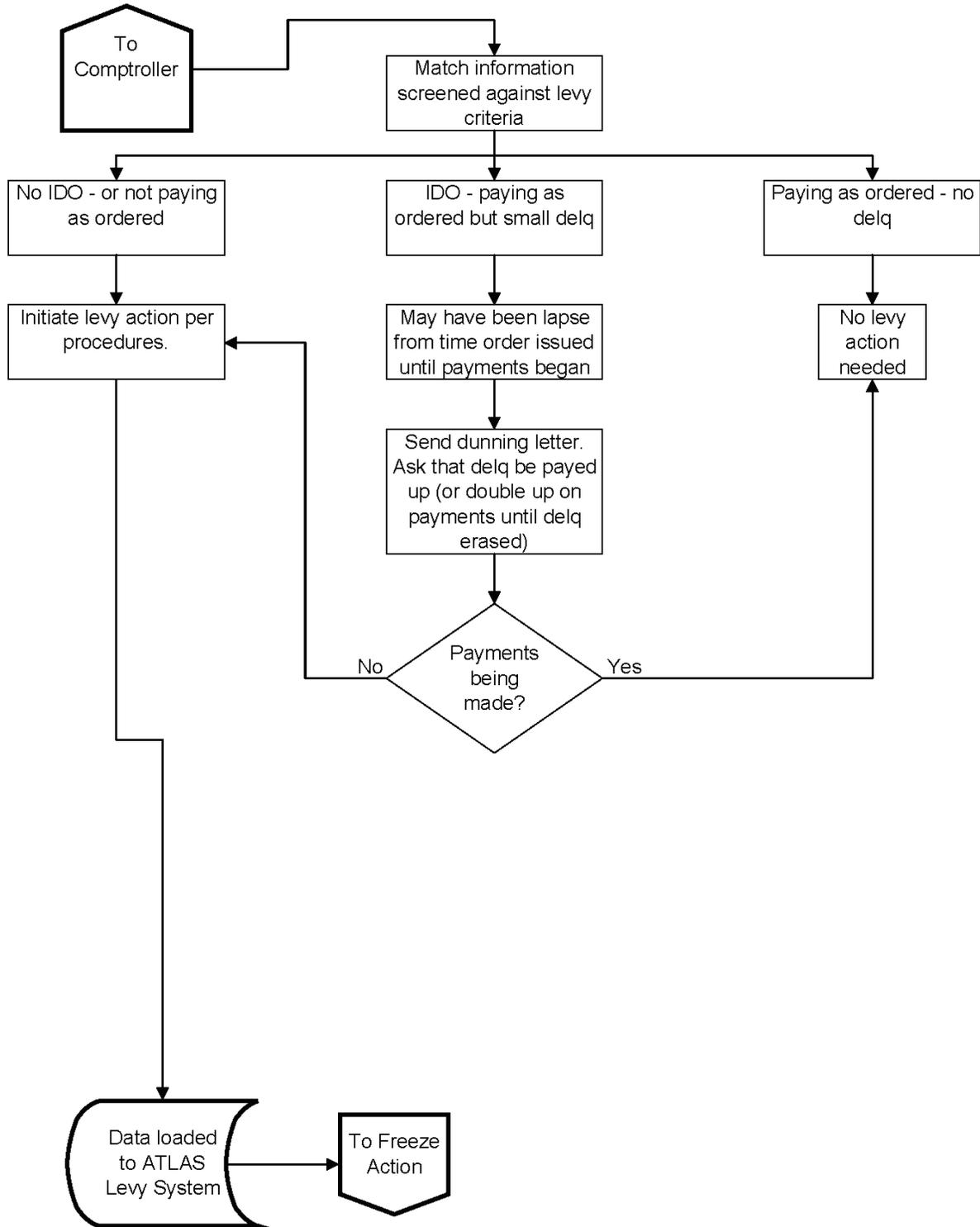# Financial Institution Data Match Process Flow Mapping

Levy Actions

Financial Institution Data Match Process Flow Mapping

Comptroller Match

```
   ┌──────────┐                    ┌──────────────────────┐
   │    To    │───────────────────▶│  Match information    │
   │Comptroller│                   │ screened against levy │
   └──────────┘                    │      criteria        │
                                   └──────────────────────┘
         ┌─────────────────────────────┼────────────────────────────┐
         ▼                             ▼                            ▼
┌──────────────────┐      ┌──────────────────────┐      ┌──────────────────────┐
│ No IDO - or not  │      │   IDO - paying as    │      │ Paying as ordered - no│
│ paying as ordered│      │ ordered but small delq│      │        delq          │
└──────────────────┘      └──────────────────────┘      └──────────────────────┘
         │                             │                            │
         ▼                             ▼                            ▼
┌──────────────────┐      ┌──────────────────────┐      ┌──────────────┐
│Initiate levy     │◀─────│  May have been lapse │      │   No levy    │
│action per        │      │ from time order issued│      │    action    │
│procedures.       │      │ until payments began │      │   needed     │
└──────────────────┘      └──────────────────────┘      └──────────────┘
         │                             │                            ▲
         │                             ▼                            │
         │                  ┌──────────────────────┐               │
         │                  │ Send dunning letter. │               │
         │                  │ Ask that delq be payed│              │
         │                  │ up (or double up on  │               │
         │                  │ payments until delq  │               │
         │                  │      erased)         │               │
         │                  └──────────────────────┘               │
         │                             │                            │
         │                             ▼                            │
         │                        ◇─────────◇                      │
         │              No     ╱ Payments   ╲    Yes                │
         │              ◀──────  being made? ──────────────────────┘
         │                      ╲           ╱
         │                        ◇─────────◇
         ▼
┌──────────────┐      ┌──────────────┐
│ Data loaded  │─────▶│  To Freeze   │
│  to ATLAS    │      │    Action    │
│ Levy System  │      │              │
└──────────────┘      └──────────────┘
```
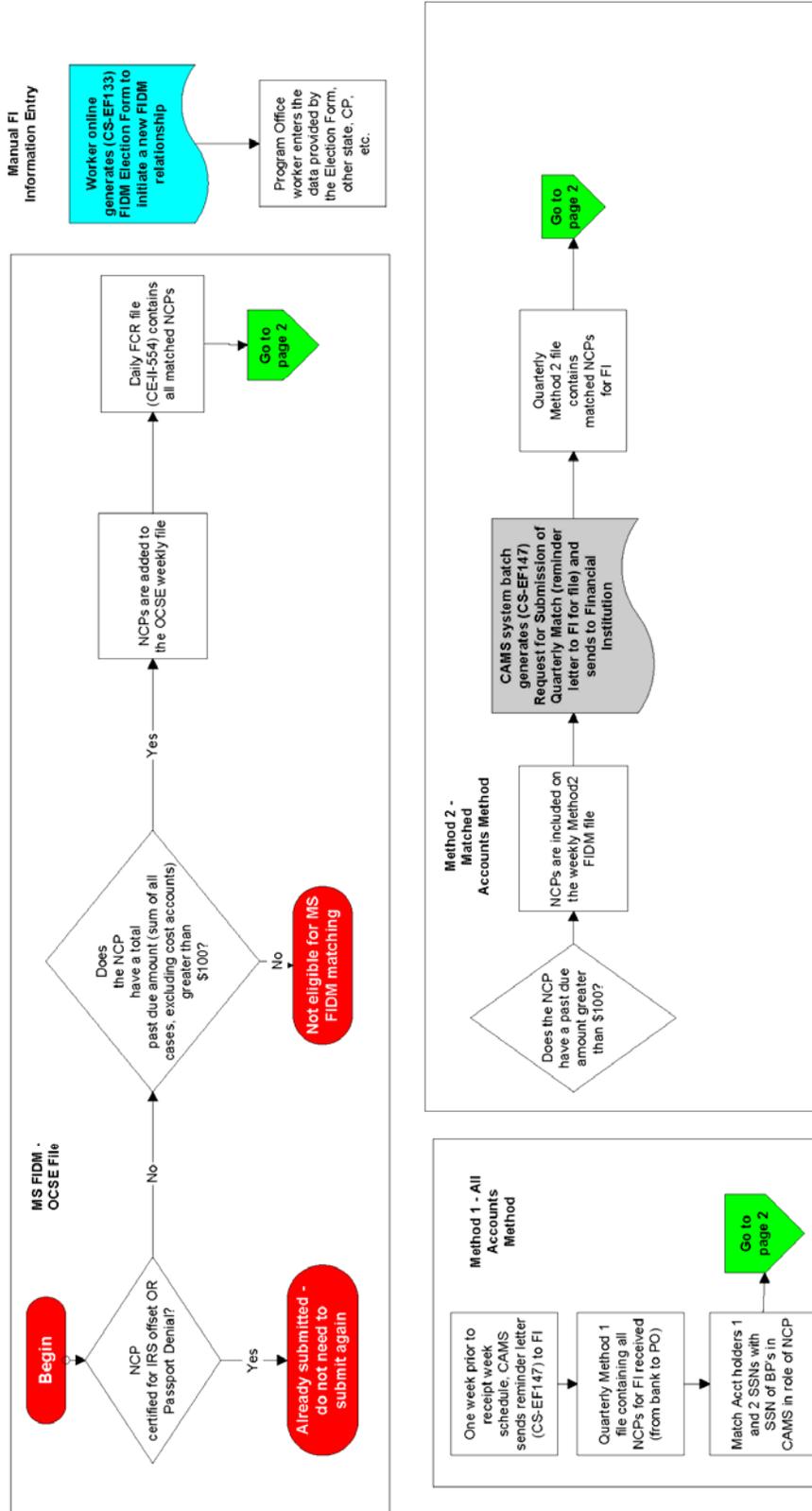
CAMS Process Flowchart

The process flow diagrams are the conceptual design for how Florida will implement FIDM with CAMS.
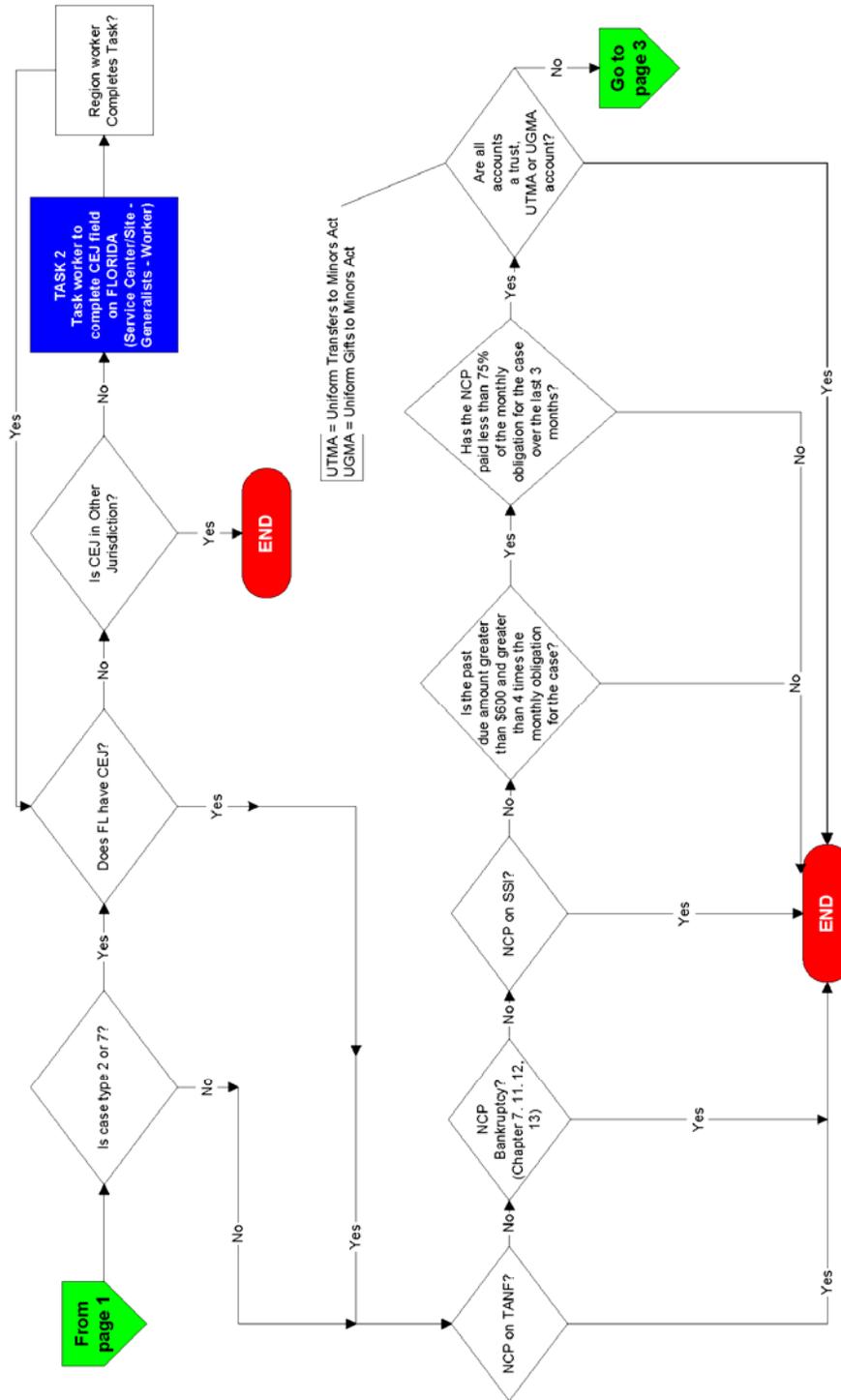
Florida Department of Revenue, Child Support Enforcement

CAMS Process Orientation Flowchart
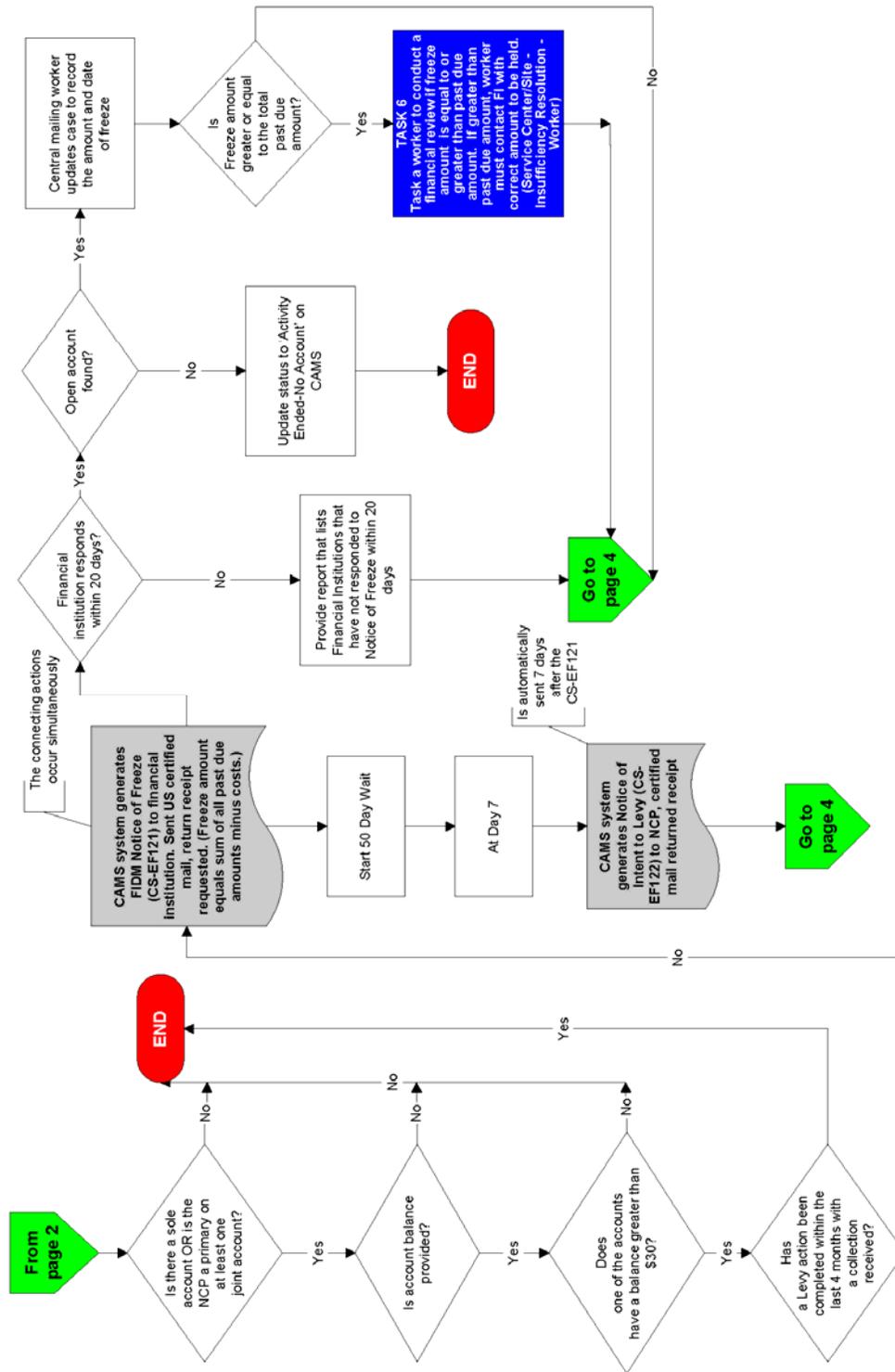**Bank Levies – Section 7630**
Page 1

Florida Department of Revenue, Child Support Enforcement

CAMS Process Orientation Flowchart
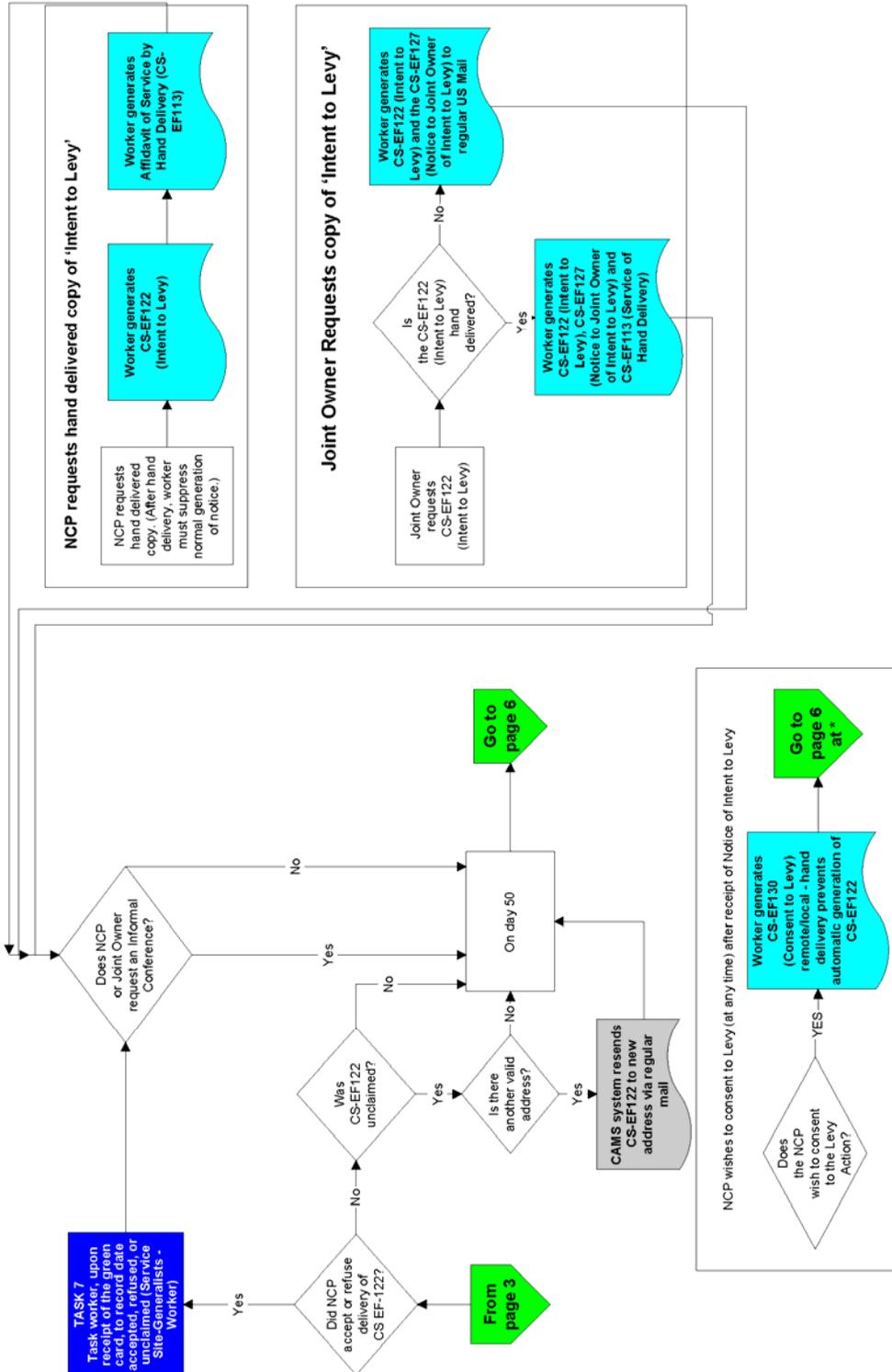**Bank Levies – Section 7630**
Page 2

Florida Department of Revenue, Child Support Enforcement

CAMS Process Orientation Flowchart
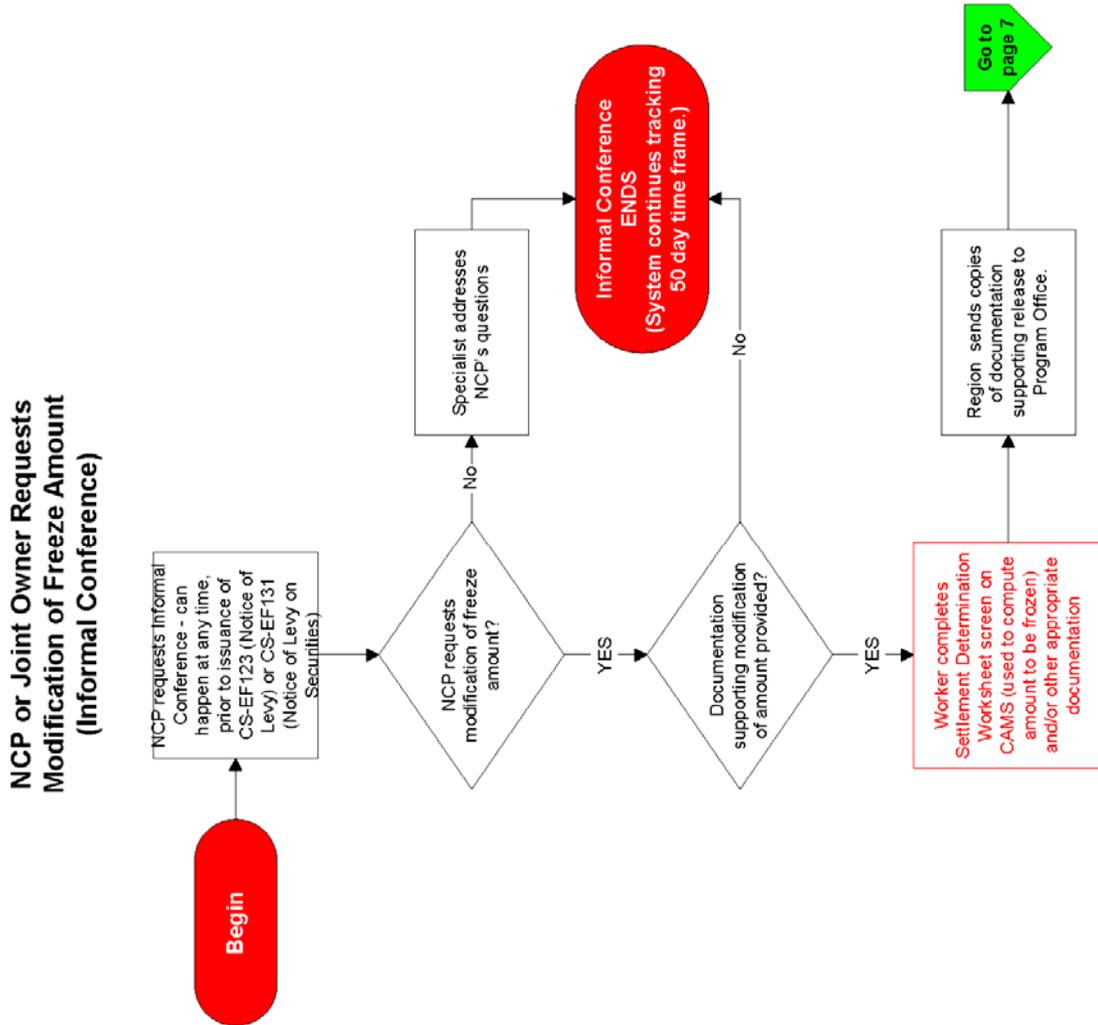## Bank Levies – Section 7630
Page 3

Florida Department of Revenue, Child Support Enforcement

CAMS Process Orientation Flowchart
Bank Levies – Section 7630
Page 4

Florida Department of Revenue, Child Support Enforcement

CAMS Process Orientation Flowchart
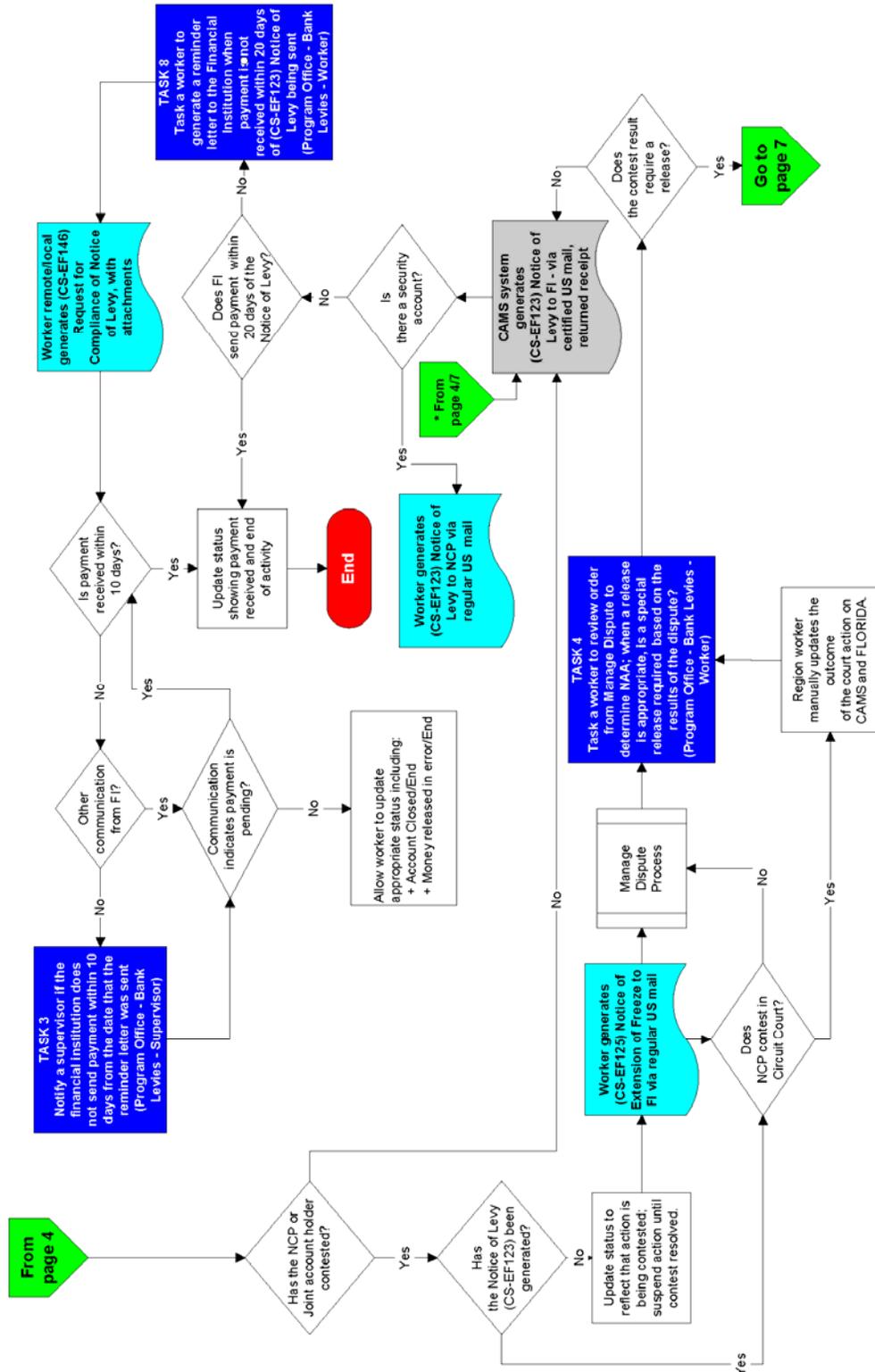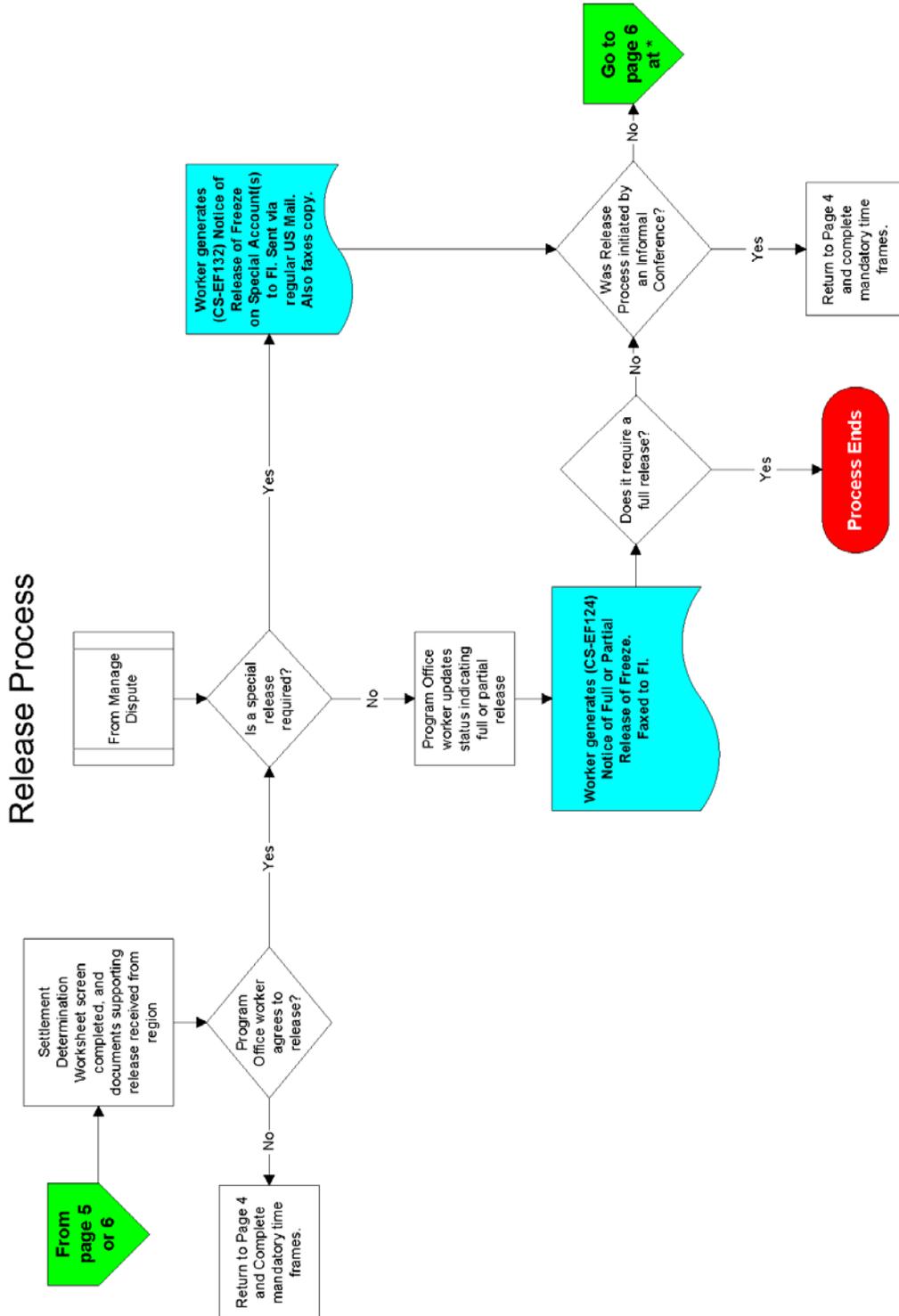**Bank Levies – Section 7630**
Page 5

NCP or Joint Owner Requests Modification of Freeze Amount (Informal Conference)

```
                                              ┌────────────────────┐
                                              │ Go to              │
                                              │ page 7             │
                                              └────────────────────┘
                                                        ▲
                                                        │

┌──────────┐     ┌─────────────────────┐      ◇ NCP requests              Specialist addresses
│  Begin   │────▶│ NCP requests Informal│ ───▶ ◇ modification of freeze ──No──▶ NCP's questions
└──────────┘     │ Conference - can     │      ◇ amount?                              │
                 │ happen at any time,  │          │                                  ▼
                 │ prior to issuance of │         YES                    ┌──────────────────────────┐
                 │ CS-EF123 (Notice of  │          │                     │ Informal Conference      │
                 │ Levy) or CS-EF131    │          ▼                     │ ENDS                     │
                 │ (Notice of Levy on   │      ◇ Documentation           │ (System continues tracking│
                 │ Securities)          │      ◇ supporting modification ─No──▶ 50 day time frame.)  │
                 └─────────────────────┘      ◇ of amount provided?       └──────────────────────────┘
                                                  │
                                                 YES
                                                  │
                                                  ▼
                                         ┌────────────────────────┐
                                         │ Worker completes       │
                                         │ Settlement Determination│
                                         │ Worksheet screen on    │
                                         │ CAMS (used to compute  │
                                         │ amount to be frozen)   │
                                         │ and/or other appropriate│
                                         │ documentation          │
                                         └────────────────────────┘
                                                  │
                                                  ▼
                                         ┌────────────────────────┐
                                         │ Region sends copies    │
                                         │ of documentation       │
                                         │ supporting release to  │
                                         │ Program Office.        │
                                         └────────────────────────┘
```

Florida Department of Revenue, Child Support Enforcement
CAMS Process Orientation Flowchart
Bank Levies – Section 7630
Page 6

Florida Department of Revenue, Child Support Enforcement

CAMS Process Orientation Flowchart
Bank Levies – Section 7630
Page 7

Release Process

From Manage Dispute

Is a special release required?

→ Yes → Worker generates (CS-EF132) Notice of Release of Freeze on Special Account(s) to FI. Sent via regular US Mail. Also faxes copy.

→ No → Program Office worker updates status indicating full or partial release → Worker generates (CS-EF124) Notice of Full or Partial Release of Freeze. Faxed to FI.

Settlement Determination Worksheet screen completed, and documents supporting release received from region

From page 5 or 6

Program Office worker agrees to release?

→ No → Return to Page 4 and Complete mandatory time frames.

→ Yes

Does it require a full release?

→ Yes → **Process Ends**

→ No → Was Release Process initiated by an Informal Conference?

→ Yes → Return to Page 4 and complete mandatory time frames.

→ No → Go to page 6 at *

Challenges and Solutions

This section provides a summary of Florida's challenges and solutions in the development and integration of its FIDM process and outlines best practices identified during the effort and benefits from FIDM automation. Florida's experience is somewhat unique for several reasons. The State is in its second iteration of FIDM implementation. It also has experience with FIDM automation for a stand-alone system (ATLAS) in addition to building the functionality in its new child support system (CAMS). The State is additionally planning to implement a FIDM module in CAMS from an off-the-shelf package (SAP), which presents a unique set of opportunities and challenges.

The table below highlights aspects of ATLAS and CAMS in the context of benefits and challenges.

	Automation Features	**Challenges**	**TIPS**
ATLAS	Automation of applying threshold criteria that takes manual calculation errors out of the picture. Having a system that tracks the action through the different stages, determines when an action is needed and prompts the worker to take the Next Appropriate Action (NAA).	Florida couldn't connect directly to the State legacy system, FLORIDA; it had to find a way to get NCP data into the stand-alone ATLAS system that it could use to compare against bank records. When a file was found that could be used for the FIDM match, its availability was limited to once a month and the data was actually extracted 1 – 2 weeks before that. This required development of business rules to insure that ATLAS was flexible enough to make threshold decisions for NCP delinquency data that was 2 – 6 weeks old at any given point.	Cited as a best practice, Florida developed the business process ahead of development of the stand-alone FIDM system, ATLAS, but with ATLAS in mind. The process was refined when ATLAS was developed to take advantage of the automation. Having the programmer on site to provide advice on what could be accomplished through automation and utilizing development tools to iterate changes on the fly. Some things that Florida would improve in ATLAS if FIDM functionality were not moving to CAMS include: Find a way to link the stand-alone system to the statewide CSE system which would cut out the second level review; and have the system generate the freeze action without user intervention.

	Benefits	**Challenges**	**Other Comments**
FIDM Module in Statewide CSE System (CAMS)	CAMS performs the entire threshold review so that the freeze actions will be generated automatically. This will save 20 – 40 work hours a week for Program Office staff. Since budget had anticipated that reduction and already had taken the position cut for it, implementation on CAMS will eliminate that burden at the same time as increasing the number of freeze notices. The State anticipates FIDM functionality in CAMS will generate 25 – 40 % more freeze notices simply because it can review the data and make decisions about sending a freeze on a 24/7 basis instead of a point in time basis. This is an automation enhancement from ATLAS, where the worker reviews the case and makes a go/no go decision. If no go, the State wouldn't look again until the next quarter when the match comes back again. The enhanced automation of the FIDM module in CAMS will store the account data and review each NCP's data daily to determine if a freeze action is appropriate. Consistency – The FIDM functionality in CAMS will automate more of the process and take the "human" factor out of the threshold process and apply criteria in a consistent manner across the board.	CAMS is being built using open source software known as SAP. Even though SAP is a very robust software application, it needs considerable modification to easily follow the FIDM process for Florida. The State was forced to make some concessions on how the application would operate and has struggled to build the security profiles it wanted that allowed varying levels of access for different classes of workers. In addition, the State had hoped for an automated process of sending certified mail that was not implemented due to budget constraints so the system produces the notices and certified mail return receipts but workers will still have to fold, stuff, and meter the outbound notices.	Florida is expecting CAMS not only to improve the FIDM process but also to be more cost-effective. The State expects to see a cost reduction based on CAMS technology. CAMS is programmed to automatically save a PDF copy of every document it generates which is then linked via URL to the activity that caused the document to generate. This will eliminate the need for FIDM workers to make hard copies for office files so the savings will be realized in manpower and associated consumables, i.e, Toner, copier equipment, paper, file folders, file space, and archive retention storage. The State also believes there will be cost "avoidance" since CAMS will not have a delay in reviewing account data and making decisions on whether or not to freeze an account. This will result in getting to the account faster and would be more successful in securing that account while it was still open. The current ATLAS process means that some freeze notices don't get sent until the match data is 30 – 70 days old and by the time it is received by the FI, some accounts are closed and the NCP has moved to a new FI. CAMS will reduce these occurrences by getting the freeze notice out to them more quickly.

Better Customer Service – CAMS will take over go/no-go decisions, leaving more time for workers to deal / negotiate with NCPs. Collections – CAMS should help improve collections since the number of freeze notices sent will increase with the automation.		

Lessons Learned and Recommendations

The above table summarizes many of the recommendations of the Florida FIDM experiences. However, one perspective of the State's experience warrants additional comment. Florida was asked to comment on whether other States should implement FIDM automation in a stand-alone system or in their child support system. The following is the State's response:

"Each State's decision should be made based on the current platform level of difficulty in implementing new functionality. Many States (like Florida) may have access to programming services that will get you a stand-alone application when you cannot get new functionality into the legacy system. Early on, there was concern that you had to program this activity into the State CS system in order to receive Federal certification -- so many States did the bare minimum so they could say "it's there." But stand-alone applications (like ATLAS) have been approved as an add-on and the system certified. Today's world of doing more with less *requires* that States be proactive in order to compete. Our view is that if we don't find a way to collect more, with less people, and reduced costs, the privatization vendor that takes our jobs will. And in today's world of technology, we owe it to the children to do everything we can to improve -- one dollar at a time -- the number and amounts we collect on their behalf. They deserve at least that."

State Statute

Title XXX - SOCIAL WELFARE

Chapter 409 - SOCIAL AND ECONOMIC ASSISTANCE

409.25657 Requirements for Financial Institutions.--
(1) Definitions.--For purposes of this section, reference is made to 42 U.S.C. s. 669A:

(a) "FI" means:

1. A depository institution, as defined in s. 3(c) of the Federal Deposit Insurance Act, 12 U.S.C. s. 1813(c);

2. An institution-affiliated party, as defined in s. 3(u) of such act, 12 U.S.C. s. 1813(u);

3. Any federal credit union or State credit union, as defined in s. 101 of the Federal Credit Union Act, 12 U.S.C. s. 1752, including an institution-affiliated party of such a credit union, as defined in s. 206(r) of such act, 12 U.S.C. s. 1786(r); and

4. Any benefit association, insurance company, safe deposit company, money-market mutual fund, or similar entity authorized to do business in the State.
(b) An "account" means a demand deposit account, checking or negotiable withdrawal order account, savings account, time deposit account, or money-market mutual fund account.

(2) The department shall develop procedures to enter into agreements with FIs doing business in the State, in coordination with such FIs and with the Federal Parent Locator Service in the case of FIs doing business in two or more States, to develop and operate a data match system, using automated data exchanges to the maximum extent feasible, in which each FI is required to provide for each calendar quarter the name, record address, social security number or other taxpayer identification number, average daily account balance, and other identifying information for:

(a) Each non-custodial parent who maintains an account at such institution and who owes past due support, as identified by the department by name and social security number or other taxpayer identification number; or (b) At the FI's option, each individual who maintains an account at such institution. Use of this information shall be limited to the purpose of administration of the Title IVD program for child support enforcement.

(3) The department shall pay a reasonable fee to an FI for conducting the data match provided for in subsection (2), not to exceed the actual costs incurred by such FI.

(4) An FI shall not be liable to any person nor shall it be required to provide notice to its customers:

(a) For disclosure of any information as required under this section;

(b) For encumbering or surrendering any assets held by such FI in response to a notice of lien or levy issued by the department;

(c) For disclosing any information in connection with a data match; or

(d) For any other action taken in good faith to comply with the requirements of this section.

(5) Any financial records obtained pursuant to this section may be disclosed only for the purpose of, and to the extent necessary, in establishing, modifying, or enforcing a support obligation of such individual.

(6) The Department of Revenue may adopt rules for establishing the procedures for automated data matches with FIs.

History.--s. 52, ch. 97-170; s. 16, ch. 99-375; s. 36, ch. 2001-158.

Title XXX = SOCIAL WELFARE

Chapter 409 - SOCIAL AND ECONOMIC ASSISTANCE

409.25656 Garnishment.—

(1) If a person has a support obligation which is subject to enforcement by the department as the State Title IV-D program, the executive director or his or her designee may give notice of past due and/or overdue support by registered mail to all persons who have in their possession or under their control any credits or personal property, including wages, belonging to the support obligor, or owing any debts to the support obligor at the time of receipt by them of such notice. Thereafter, any person who has been notified may not transfer or make any other disposition, up to the amount provided for in the notice, of such credits, other personal property, or debts until the executive director or his or her designee consents to a transfer or disposition, or until 60 days after the receipt of such notice. If the obligor contests the intended levy in the circuit court or under chapter 120, the notice under this section shall remain in effect until final disposition of that circuit court or chapter 120 action. Any FI receiving such notice will maintain a right of setoff for any transaction involving a debit card occurring on or before the date of receipt of such notice.

(2) Each person who is notified under this section must, within 5 days after receipt of the notice, advise the executive director or his or her designee of the credits, other personal property, or debts in their possession, under their control, or owed by them and must advise the executive director or designee within 5 days of coming into possession or control of any subsequent credits, personal property, or debts owed during the time prescribed by the notice. Any such person coming into possession or control of such

subsequent credits, personal property, or debts shall not transfer or dispose of them during the time prescribed by the notice or until the department consents to a transfer.

(3) During the last 30 days of the 60-day period set forth in subsection (1), the executive director or his or her designee may levy upon such credits, personal property, or debts. The levy must be accomplished by delivery of a notice of levy by registered mail, upon receipt of which the person possessing the credits, other personal property, or debts shall transfer them to the department or pay to the department the amount owed by the obligor. If the department levies upon securities and the value of the securities is less than the total amount of past due or overdue support, the person who possesses or controls the securities shall liquidate the securities in a commercially reasonable manner. After liquidation, the person shall transfer to the department the proceeds, less any applicable commissions or fees, or both, which are charged in the normal course of business. If the value of the securities exceeds the total amount of past due or overdue support, the obligor may, within 7 days after receipt of the department's notice of levy, instruct the person who possesses or controls the securities which securities are to be sold to satisfy the obligation for past due or overdue support. If the obligor does not provide instructions for liquidation, the person who possesses or controls the securities shall liquidate the securities in a commercially reasonable manner in an amount sufficient to cover the obligation for past due or overdue support and any applicable commissions or fees, or both, which are charged in the normal course of business, beginning with the securities purchased most recently. After liquidation, the person who possesses or controls the securities shall transfer to the department the total amount of past due or overdue support.

(4) A notice that is delivered under this section is effective at the time of delivery against all credits, other personal property, or debts of the obligor which are not at the time of such notice subject to an attachment, garnishment, or execution issued through a judicial process.

(5) The department is authorized to bring an action in circuit court for an order compelling compliance with any notice issued under this section.

(6) Any person acting in accordance with the terms of the notice or levy issued by the executive director or his or her designee is expressly discharged from any obligation or liability to the obligor with respect to such credits, other personal property, or debts of the obligor affected by Page 1 of 2 Statutes & Constitution compliance with the notice of freeze or levy.

(7)(a) Levy may be made under subsection (3) upon credits, other personal property, or debt of any person with respect to any past due or overdue support obligation only after the executive director or his or her designee has notified such person in writing of the intention to make such levy.

(b) Not less than 30 days before the day of the levy, the notice of intent to levy required under paragraph (a) must be given in person or sent by certified or registered mail to the person's last known address.

(c) The notice required in paragraph (a) must include a brief Statement that sets forth:
1. The provisions of this section relating to levy and sale of property;
2. The procedures applicable to the levy under this section;
3. The administrative and judicial appeals available to the obligor with respect to such levy and sale, and the procedures relating to such appeals; and
4. The alternatives, if any, available to the obligor which could prevent levy on the property.
(d) The obligor may consent in writing to the levy at any time after receipt of a notice of intent to levy.

(8) An obligor may contest the notice of intent to levy provided for under subsection (7) by filing a petition in the existing circuit court case. Alternatively, the obligor may file a petition under the applicable provisions of chapter 120. After an action has been initiated under chapter 120 to contest the notice of intent to levy, an action relating to the same levy may not be filed by the obligor in circuit court, and judicial review is exclusively limited to appellate review pursuant to s. 120.68. Also, after an action has been initiated in circuit court, an action may not be brought under chapter 120.

(9) An action may not be brought to contest a notice of intent to levy under chapter 120 or in circuit court, later than 21 days after the date of receipt of the notice of intent to levy.

(10) The department shall provide notice to the Chief Financial Officer, in electronic or other form specified by the Chief Financial Officer, listing the obligors for whom warrants are outstanding. Pursuant to subsection (1), the Chief Financial Officer shall, upon notice from the department, withhold all payments to any obligor who provides commodities or services to the State, leases real property to the State, or constructs a public building or public work for the State. The department may levy upon the withheld payments in accordance with subsection (3). Section 215.422 does not apply from the date the notice is filed with the Chief Financial Officer until the date the department notifies the Chief Financial Officer of its consent to make payment to the person or 60 days after receipt of the department's notice in accordance with subsection (1), whichever occurs earlier.

(11) The Department of Revenue has the authority to adopt rules to implement this section.
History.--s. 90, ch. 96-175; s. 12, ch. 96-189; s. 51, ch. 97-170; s. 15, ch. 99-375; ss. 34, 35, ch.
2001-158; s. 11, ch. 2002-173; s. 443, ch. 2003-261; s. 13, ch. 2004-334.

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Case Study: New York

FIDM Automation

State of New York
Office of Temporary Disability Assistance
Division of Child Support Enforcement

State Profile

Division of Child Support Enforcement

In New York State, the child support enforcement program is State supervised and locally administered. The New York State Division of Child Support Enforcement (DCSE) is located within the Center for Child Well-Being of the Office of Temporary and Disability Assistance (OTDA) (formerly the Department of Social Services). DCSE is the single State agency designated to supervise the administration of the State's child support enforcement program.

Local administration of the program is carried out by the 58 local social services districts (which consist of New York City and the remaining 57 counties) through the child support enforcement units (CSEU).

State Division of Child Support Enforcement (DCSE)

DCSE ensures that all Federal and State requirements are being met by the local district child support enforcement units (CSEU) by performing the following functions:

- Monitoring and assessing performance levels.

- Providing technical assistance and program support.

- Operating a Statewide computer system.

- Providing centralized services.

- Issuing regulations, policies, and procedures.

- Providing child support training.

- Administering program funding.

Local Child Support Enforcement Units (CSEU)

Within each of the 58 local social services districts, the child support enforcement units (CSEU's) are responsible for providing the following child support enforcement services:

- Creating computerized case files.
- Initiating location searches.
- Interviewing recipients of services and non-custodial parents.
- Preparing and filing paternity and support petitions, affidavits, and orders.
- Providing legal services.
- Preparing and filing acknowledgments of paternity.
- Monitoring cases for support compliance.
- Administering support collections.
- Providing payment information.
- Issuing administrative enforcement notices.
- Referring cases to the New York State Department of Taxation and Finance.
- Issuing orders for DNA or genetic marker testing in contested paternity cases.
- Issuing subpoenas for information.
- Accessing information from government agencies.
- Accessing employment and financial records.

In 2006, New York had just under 900,000 active child support cases (about half of those in New York City) and collections of about $1.5 billion dollars.

Background

Nationally, the number of child support cases has increased from 2 million in 1976 to 20 million in 1997. Nearly one half of all child support cases receive minimal or no support.

The New York State Office of Temporary and Disability Assistance (OTDA) is committed to improving the lives of children by implementing a child support enforcement strategy. The latest tool in this strategy is the FIDM.

In addition to the Federal FIDM requirements, State law also requires banks and other fiduciary institutions doing business in New York State to provide OTDA with access to information contained in records held with respect to custodial and non-custodial parents, including information regarding assets and liabilities, for the purpose of establishing paternity and/or establishing, modifying, or enforcing an order of support (New York State Social Services Law §111-h (8) and §111-s).

In 1998, the New York Legislature adopted the data match requirements. New York State Social Services Law §111-o and Banking Law§ 4 (2) and Insurance Law §320 (e) require OTDA to establish the process and ensure that FIs participate in the FIDM.

Child Support Management System (CSMS)

The Child Support Management System (CSMS) is administered by local social services districts. The CSMS provides many automated processes and capabilities which assist the local districts in verifying, monitoring and enforcing child support cases.

The CSMS has a proven capacity to handle large caseloads. The communications network shared by the local social services agencies consists of approximately 11,000 devices (personal computers, terminals and printers). The average response time for any device on the network is 3 seconds, with an average transaction volume of 300,000 transactions per day.

As discussed previously, the child support program in New York is State-supervised and county administered. This organizational structure requires that the child support system meet the regulatory requirements while allowing the counties a large degree of control over the management of cases.

Business Process

CSMS operates the FIDM for all FIs within the State (whether the match is facilitated at the Federal level or conducted directly with the State). The information is established, checked and routed by CSMS. Data records are applied to all corresponding child support obligor cases maintained by CSMS. When a child support obligor's CSMS account meets the predetermined selection criteria, the financial asset record linked to the obligor's CSMS account enters the automated asset seizure process. Restraining notices are automatically issued to the FI for those cases meeting certain delinquency criteria. FIs receiving a restraining notice and subsequent execution are required to restrain and later surrender the assets of the delinquent obligor held by the institution.

Assets of child support obligors held in FIs subject to the States' jurisdiction, or FIs which do not maintain accounts in New York but have agreed to accept legal process from the State, are included in the assets seized. Many FIs contract with reporting agents (also known as service agents, service providers, or transmitters) for Internal Revenue Service Form 1099 reporting. Since the specifications for FIDM are similar to the 1997 Form 1099 format, these reporting agents/transmitters may also be used to report data match information. Any institution may send information to OTDA through an agent/transmitter. If an FI chooses to contract with a service provider to report information, the FI must sign the Memorandum of Agreement (MOA), not the service provider. The FI, not the service provider, remains responsible for compliance with the law.

Costs

OTDA and the FI are each responsible for their own costs in administering this program.

Memorandum of Agreement

All FIs must complete the information requested and sign an MOA. In addition, copies of the agreement may be found on the OTDA website at www.otda.State.ny.us.

The initial agreements with FIs were to be submitted to OTDA no later than April 2, 2001.

Test Files

FIs that have a signed MOA may request a test file prior to the initiation of their first match. The requests may be made to the FIDM Help Desk.

Changes in Reporting Methods, Service Providers, or Types of Media

Changes in reporting methods, service providers or types of media may take place upon execution of a new MOA between OTDA and the FI. .

Automation Process

The data matches are completed by either of the following two methods outlined in the Financial Data Match Specification Handbook approved by the U.S. Office of Management and Budget (OMB). Electronic copies are available on the OTDA website at: www.otda.State.ny.us.

Reporting is accomplished by one of the following two methods:

- Method 1 allows the FI or its data service provider to submit a file containing all of the open accounts held by the institution. The file is matched by OTDA against records of child support obligors.

- Method 2 allows the FI to receive a data file, commonly called the Inquiry File, from OTDA which contains records of all child support obligors and/or custodial parents. The FI must match the records contained in the Inquiry File against all the accounts it maintains and return the matched records file to OTDA within 45 days.

The following outlines the automation process steps for New York's FIDM match. The steps are broken down into "Day 1" and "Day 2" procedures.

Day 1:

- Mainframe operation, CSMS. Fully automated. Connect:Direct for MSFIDM. FTP for New York FIDM. A contractor operates NYFIDM.

- MSFIDM and NYFIDM are combined into a single process with a few exceptions.

- Regardless of the volume, all "MC" records and all "NY" records are processed to the database on the day received. CSMS maintains an option for controlling the number of records processed by FEIN (TIN).

- CSMS verifies name and Social Security number on "MC" and "NY" records. Only valid name and SSN combinations enter the automated asset seizure process.

- Obligor address information is directed to a separate "parent locator" report process that is added to the database.

- CSMS screens "MC" and "NY" records to determine whether the asset type is eligible for the automated asset seizure process. Escrow accounts, ILTA, UGMA, ERISA Plan, and trust accounts are automatically identified and excluded by the system.

- For MSFIDM, "MC" records are matched against the "TIN Table." CSMS verifies whether the bank will accept direct levy. In the automated seizure process, CSMS FIDM records are coded either for entry or elimination. NYFIDM does not require the use of a "TIN Table."

- For MSFIDM, CSMS searches for any other obligor case(s) containing the same SSN that is found on the "MC" record. If the same person (obligor) is found in the other case(s), the "MC" record is "copied" for the case(s). NYFIDM is a one-for-one match and load. Matched records are returned for each CSMS obligor account number (a unique identifier).

- For NYFIDM, the "inquiry" file is updated weekly and it contains all obligors regardless of delinquency.

- The inquiry and match record file layouts for NYFIDM are the same as the file layouts for MSFIDM. There is separate tracking of the "source" documents.

- On CSMS obligor case records, CSMS "builds" a single, unique record (IVDFDM) of each FI in which the obligor is found to have an account. It's a "bank-to-obligor" record, never duplicated. The "TIN" prevents duplication.

- The IVDFDM record contains information that includes asset type and balance.

- A new IVDFDM record is built as a result of the initial match with the FI for the unique SSN that is found in the particular CSMS obligor case. The IVDFDM record is updated by CSMS as a result of a subsequent match.

- IVDFDM is coded as to source (MSFIDM or NYFIDM), to determine if direct levy is permitted (MSFIDM), and to decide whether to allow the record to be used for the automated asset seizure process (direct levy permitted, a valid SSN/name combination).

- Local county child support workers receive a daily report electronically detailing the IVDFDM records either added or updated to every CSMS obligor case record and the condition of the record indicated above. The reports are separated by a unique worker code to expedite delivery.

- Local county child support workers receive a report electronically detailing the obligor address records either added or updated to CSMS as a result of MSFIDM or NYFIDM.

- The IVDFDM record, meeting the predetermined criteria, is the source record for the automated asset seizure process. If and when the CSMS obligor case meets the delinquency threshold, the information from any and all of the IVDFDM records is used to create the asset seizure records.

- The asset seizure record "controls" the asset seizure process. New York refers to the asset seizure record as the Property Execution (asset seizure) or PEX record.

Day 2:

- The selection criteria for the **automated** asset seizure process is a delinquency in the amount of child support to be paid for 2 months, no payment by income execution (wage withholding) within the previous 45 days, and a past-due balance of not less than $300. As long as there is a delinquency of at least the amount of support to be paid for 2 months, the local district child support worker can manually initiate the asset seizure process.

- If the CSMS obligor case is not yet eligible for the **automated** PEX process, the IVDFDM record "stands" ready in the event of "sudden" qualification.

- A single, unique PEX record is "built" by CSMS for each single, unique IVDFDM record already "approved" by CSMS for the automated asset seizure process. The PEX record functions as the documentation and "control panel" for CSMS in the asset seizure process.

- When the CSMS obligor case is PEX eligible, a restraining notice ("freeze" notice) is produced by CSMS immediately. A notice to the obligor is issued after the seize notice giving the obligor 15 days to claim a mistake of fact. Absent a claim being upheld, the seize notice is issued to the FI. All notices are produced at the State's child support collection processing center on behalf of the local county support collection units.

- **All** "approved" IVDFDM records enter the automated asset seizure process. Freeze and seize notices are issued to all identified FIs **simultaneously**.

- CSMS tracks and records the asset seizure process for every PEX record from restraining notice to seize notice to delivery of the money. Intervening steps, such as a claim of "mistake of fact" (due process considerations) are also tracked.

- Daily reports are transmitted electronically to local county child support workers detailing the stage of the asset seizure process for each case in their caseload and whether any direct follow-up is necessary.

- Local county child support workers handle all matters pertaining to due process.

Data Specifications and Reporting Methods

Confidentiality of Data

FIs that select the Method 2 reporting option are in receipt of highly confidential data. These FIs shall maintain the Inquiry File in a secure and confidential manner and return the Inquiry File to OTDA along with the matched record file. These FIs must also purge the Inquiry File data and the matched record data from its files immediately upon completion of each match process. Further, no information or code shall be added to any account maintained by the FI, which would indicate it has been included on a matched record file.

Reporting Periods

All FIs are required to report each calendar quarter. FIs must select the month and week within the second calendar quarter (April, May, June) of the year, starting in year 2001, to either submit a file containing all of the open accounts held by the institution (if a Method One reporter) or receive the Inquiry File (if a Method 2 reporter). Once an initial month and week is selected, all subsequent data exchanges will occur in the same selected month and week of each calendar quarter thereafter. For example, if the institution selects the first month and the first week -- April, week one, 2001 -- it will subsequently participate in July, week one, 2001; October, week one, 2001; January, week one, 2002; and in subsequent years.

Types of Media

The FIs may choose one of the following media to exchange the required data with OTDA:

- IBM 3480 tape cartridge
- 9-Track Round Reel
- FTP File Transfer, such as IBM NetView
- CD-ROM (ASCII)
- IBM 3490 tape cartridge
- DAT 4mm and 8mm
- 1.44MB 3.5", 5.25" diskettes (ASCII)
- Other as selected by the FI

Thresholds

Assets of child support obligors held in FIs subject to New York State's jurisdiction, or assets held in out-of-state FIs that accept direct levy, are included in the asset seizure process. Asset seizure may occur when the child support obligor is delinquent in child support payments in an amount equal to or greater than the amount of child support directed to be paid for 2 months. In addition, it is the current policy of OTDA not to

initiate the automated seizure process unless and until there is a past-due balance of at least $300 and no payment has been received for at least 45 days.

What types of assets are included in the asset seizure process?

- Savings
- Cash Balance
- Checking
- Compound Account
- Term Deposit Certificates Securities
- Money Market
- Mutual Funds
- Other Account types not specifically exempt by Federal or State law

What types of assets are excluded from the automated asset seizure process?

- Uniform Gift to Minors Act account
- Interest on Lawyers Trust Account
- ERISA Plan accounts
- Mortgage Escrow and Security Deposit Accounts

Restraining Notice

New York's CSMS, on behalf of the local support collection unit (SCU), issues, by certified mail, a Restraining Notice to the FI.

State law authorizes service of the Restraining Notice by regular mail alone. The FI must immediately "freeze" any and all assets owned by the child support obligor, individually or jointly, which are held by the FI. The FI may be issued, on a case-by-case basis as necessary, an administrative subpoena or information subpoena directly from the SCU.

Notice of Respondent (Judgment Debtor/Obligor)

Upon issuing the Restraining Notice to the FI, the automated asset seizure process will issue a Notice to Respondent (Judgment Debtor/Obligor). The notice is mailed to the child support obligor's last known address of record. A copy of the notice can be found in Appendix C.

Obligor's Due Process

The child support obligor is afforded 15 days to claim a "mistake of fact." The child support obligor must contact the local SCU and only the local SCU that issued the notice in order to exercise his or her legal rights. The name, address and phone number of the appropriate local SCU is printed on the Restraining Notice in the upper left-hand corner on the first page. In response to a claim of mistake of fact, no further action may be taken by the SCU until the SCU determines the validity of the claim and issues its

determination to the obligor, which must be within 45 days. The written determination is called an Article 52 Execution Review Disposition Notice. If the SCU determines that the claim of mistake of fact is not valid, after notice to the child support obligor, the execution notice will be issued to the FI.

<u>Notice to Vacate Restraining Notice</u>

If the child support obligor's claim is upheld, the SCU must immediately issue a Notice to Vacate Restraining Notice to the FI.

<u>Execution with Notice to Garnishee</u>

If the mistake of fact claim is denied, or the mistake of fact is not claimed, the automated asset seizure process will issue the Execution with Notice to Garnishee to the FI together with payment coupons. The account assets must be immediately paid to the local SCU as indicated, accompanied by the payment coupon. Please Note: It is essential that the FI include the payment coupon to ensure proper identification and crediting of the funds received.

Challenges and Solutions

New York was quick to point out that their approach to complete automation (all policy and business rules) within CSMS makes for an effective implementation of FIDM. This results in minimal involvement of staff at the central office, thus resulting in cost savings. On-going operating costs are minimal for a State the size of New York. The State also believes this resulted in savings related to staff training and staff time at the local level. The State strongly suggests that complete and total automation is the best way to operate and control the FIDM process. New York also recommends tight thresholds and strictly enforced policies for FIDM. It supports the idea that FIDM is not only about total collections, but about strictly enforcing laws in place that are critical to reducing child support arrearage.

State Statute

For FIDM data matching:
Social Services Law §111-o and Banking Law§ 4 (2) and Insurance Law §320 (e)

For seize and freeze:
Civil Practice Law and Rules §§5101; 5222; and 5230

S580-305. Duties and powers of responding tribunal. (a) When a responding tribunal of this State receives a petition or comparable pleading from an initiating tribunal or directly pursuant to subdivision (c) of section 580-301 of this part (proceedings under this article), it shall cause the petition or pleading to be filed and notify petitioner where and when it was filed.

(b) A responding tribunal of this State, to the extent otherwise authorized by law, may do one or more of the following:

   (7) place liens and order execution on the obligor's property

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Case Study: Oklahoma

State Profile

In Oklahoma, the Child Support Enforcement Division (CSED) has 707 CSE staff in 40 local offices with a caseload size of 180,130 and annual collections of $244,711,568. Oklahoma uses its Tax intercept files for submission to the OCSE for the MSFIDM. Since January 2000, it has submitted the same tax offset file for submission to the Electronic Parent Locator Network (EPLN) currently known as Interstate Data Exchange Consortium (IDEC) for in-state FIDM matching. Since IDEC also matches against other participating States' financial institutions (FIs), matches with out-of-state FIs are also provided. When the in-state, IDEC out-of-state, and MSFIDM matches are received, they are processed through an Auto FIDM Analyzer program that resides in Oklahoma's Support Information System (OSIS). The Auto FIDM Analyzer program contains all of the thresholds that must be passed through before a FIDM match can be processed as an Auto levy. Programming changes and updates are done through Oklahoma's programming vendor, which is currently Northrop Grumman.

Those matches that do not meet all of the Auto levy requirements will go to a Manual FIDM list for local office staff to review and, if appropriate, prepare the levy for mailing.

Initial FIDM Process

Initially, paper reports were created from both the MSFIDM and in-state match files received either daily or quarterly and sent to the local offices for their review. The local offices would generate the levy documents if the matched case met the levy criteria. The only centralized activities at the State Office level were the generation of the paper match reports and the tabulation of FIDM collection.

However, there were delays in getting the levy process started by the local offices, with some offices being more enthusiastic about FIDM than others. Some problems included inconsistent policies from office to office as to when a case qualified for a levy action and staffing problems, such as not having a dedicated staff to handle levy actions.

Workers researched the case to see if it qualified for a levy action. If the criteria were met, the worker generated all of the levy documents and obtained the necessary attorney signatures. The worker would mail the levy to the FI and obligor and keep track of the timelines for the obligor's response time period. If the obligor made a request for a review, the worker was to work together with the attorney to determine the outcome of the review.

The obligor has the right to request an administrative review of the case, known as a desk audit, to make a determination if a levy release is warranted. In Oklahoma, the courts are only involved if it is determined that a levy is to remain in effect, and then the obligor may request an administrative hearing to make a final determination as to the levy status. If the levy remains in effect, the obligor may request a hearing before an administrative law judge.

Initially, the only automated process in effect was the generation of weekly paper reports for local office use. The local offices would then research the lists to see what cases would qualify for levy actions.

Matching

IDEC uses both method one (all accounts) and method two (matched accounts) for the InState FIDM matching process.

Local Office Involvement in FIDM

Oklahoma CSED coordinates with OCSE for MSFIDM and IDEC for the in-state FIDM matches. CSED oversees the programming for the Auto FIDM Analyzer and works with other departments within the Dept. of Human Services (Print and Mail Centers) in producing the actual levy documents. Those matches that do not meet all of the Auto levy requirements will go to a Manual FIDM list for local office staff to review and, if appropriate, prepare the levy for mailing.

CSED workers generate Manual FIDM levies and the local office staff performs all of the requested administrative reviews and levy hearings when necessary.

Oklahoma's Auto levy system does not have the capability to generate freeze and seize notices for FIs not doing business in the State, but local office workers are made aware of institutions outside of the State that will accept direct levies, such as Wachovia, Fifth Third Bancorp and Compass Bank.

Oklahoma's Auto levy system is not currently capable of automatically generating AEI requests. When it is necessary to generate an AEI request, Oklahoma staff will either use the traditional paper method of sending a UIFSA transmittal #1 with related documentation to those States not participating in IDEC's AEI process or use the IDEC electronic version for the 13 States currently using IDEC's AEI functionality.

Manual FIDM Checklist

_____ 1. NCP is 90 days in arrears. Also need to check if NCP in bankruptcy.
_____ 2. The worker will need to check if the NCP has made voluntary payments* of at least 92% of what was owed for the past six (6) full calendar months. This includes current support and amounts owed for an arrearage elimination plan. The amount reviewed should be an aggregate or rolling six (6) month time frame to allow for

discrepancies caused by effective dating of receipts and weekly or bi-weekly collections.

_____ 3. Current arrearage computation completed.
_____ 4. Attorney's name and Bar number for inclusion on documents (on PTDFU).
_____ 5. Print out FIDM forms. F02, F04, F06, F08.
_____ 6. FIDM forms (*Notice of Levy – F06*) to attorney for review and signature.
_____ 7. *Notice of Levy – FI Copy* (F06) and *FI Worksheet* (F04) are sent to NCP's FI. (Also update the LENA screen so that an Auto levy will not be generated to the same bank while the Manual levy is in effect.)
_____ 8. Three business days later, the *Notice of Levy – Obligor's Copy* (F06) and *Notice of Levy and Right to Administrative Review* (F02) are mailed to the NCP (and NOJAH if applicable).
        *****Parties have 15 days to respond to levy action*****

If NCP and/or NOJAH respond to levy action:

_____ 1. Present Administrative Review to State's Attorney. Review to be completed within 10 days of request being received by CSED or NOJAH.
_____ 2   Send *Notice of Review Decision* (F08) to NCP and/or NOJAH.
_____ 3. If Attorney releases levy, send Full or Partial Levy Release document (F10) to NCP's FI. Copy also to go to NCP and/or NOJAH.

After Administrative Review has been completed, NCP and NOJAH have 15 days to request an administrative hearing.

If NCP and/or NOJAH do not respond to the levy action, DHS can release money as soon as it has been received from the FI (which will be after 21 day holding period).

- Voluntary payments include funds received from personal checks, money orders, income assignments and unemployment compensation payments.
  Voluntary payments **do not** include tax offsets, FIDM and lump sum workers compensation settlements.

Automation of In-State FIDM

The first steps of the FIDM levy process have been automated. When FIDM matches are received they go through the Auto FIDM Analyzer program. Matches that meet with all of the programming requirements will have levies automatically generated and sent to the appropriate FI and obligor. If the FIDM match meets with CSED's criteria, a levy will be generated and sent to the appropriate FI. Three working days later, a notice of levy is sent to the obligor giving him or her notice and instructions on how to dispute the levy action. The levy is good for 60 days upon receipt by the FI. After the first 21 days, all funds in the frozen account(s) up to the amount of the levy are to be sent to CSED. If there is still a balance owed on the levy, the FI will keep the freeze in effect for the balance of the time period (39 days) in case any additional funds are deposited into the account(s). The levy notice Oklahoma uses serves as both a freeze and seize notice. Only one levy form is sent out to the FI for the entire process.

Automation of Asset Seizure Process

Both the multistate and in-state FIDM matches go through an Auto FIDM Analyzer program. The individual match must meet a list of criteria before an Auto levy is generated. This process is done once a week and those matches that qualify for Auto levy are mailed out the same day of the FIDM Analyzer run. Notices to the obligors go out three working days later. Lists are produced of both the matches that qualified for Auto levies and those that need further review in the Manual list.

Upon matching a delinquent obligor with an account in a financial institution, CSED issues a *Notice of Levy* for each matched account.

1. FIDM Levy Analyzer Criteria

a) *The case has been excluded from the Auto FIDM process.* The analyzer program reviews to see if the FGN has been excluded on the CSEAS screen.

b) *The NCP must not have an active bank levy for the FGN/FI.* No levies have been sent to the FI showing on the match report within the past 60 days. When a bank levy is sent out, the LENA/LENI screen is updated. For auto levies, the system automatically updates the screen. Specialists update the screens when manual levies have been sent out.

c) *The case is an open enforcement case with a current existing obligation.* The analyzer verifies the current case status and that the obligation is active. Cases in 02, 06, 08, and 10 status (case is open for current, judgment or arrears collections) (other than reason codes 22, 28 and 29) are reviewed for levy action.

d) *Case is open for Medical Enforcement only.* If any CP on the case has requested the case be open for Medical Enforcement only (MEO), then the match is included on the manual levy report.

e) *Case has been in active status for six (6) months and at least one obligation has been active and enforceable for six (6) months.* The analyzer verifies to see if either of these conditions has been met. If not, the match goes to the manual levy report.

f) *The NCP's SSN and name are matched.* The analyzer verifies that the name and SSN on the FIDM report match the NCP name and SSN on the system.

g) *The FIDM report shows the match to be a trust account.* If the FIDM report shows the account is a UTMA (Uniform Transfers to Minors Act), UGMA (Uniform Gifts to Minors Act), IOLTA (Interest on Lawyers Trust Accounts), mortgage escrow, security deposit or other type of trust account, the match is included on the manual levy report.

h) *The analyzer verifies the State in which the account is located.* Accounts located in Oklahoma, Delaware, Illinois, Massachusetts, Michigan, New Jersey, New Mexico, New York, North Carolina, South Carolina and Texas are accepted by the analyzer. When a report indicates an FI is in a State other than those listed, that report goes to the manual list for processing.

i) *The analyzer verifies the FI account balance is greater than or equal to $0.00.* Any match reports showing negative account balances are included on the manual levy report.

j) *The case has total arrears >$0.00.* Arrears = past due on current support + past due on judgment payments + not-yet-due on judgments.

k) *The NCP is 90 days in arrears.* The analyzer verifies if the NCP is 90 days past due in current support and/or judgment payments.

l) *The analyzer verifies the account on the report is either for checking, savings, term deposit certificate, money market, IRA/Keogh, compound or cash balances.* Accounts reported as 'not applicable' and 'other' will be processed through the FIDM Analyzer. Only accounts marked as 'collateral' and 'Employee Retirement Income Security Act' (ERISA) accounts will go to the manual FIDM report. ERISA accounts will need to be reviewed so that the specialist can prepare a Qualified Domestic Relations Order (QDRO).

m) *If the NCP has declared bankruptcy, no levy can be sent out.* However, this information is reported to the district office so it can keep current on the NCP's bankruptcy status. (Bankruptcy information is updated by the Child Support Specialist using the ASUP screen.)

n) *If there is an outgoing (active) interstate referral showing on the REFU screen, the match is included on the manual report.* The outgoing interstate specialists can prepare the proper Uniform Interstate Family Support Act (UIFSA) transmittal if the account is in the responding State.

o) *The analyzer will review whether the NCP is a good paying customer. A good paying customer is an NCP that has made voluntary payments of at least 92% of the payments due over the last 6 full calendar months prior to the date of the levy.* The time period for review will include payments made up to 5 calendar days previous to the 6 months, plus payments made in the current month that the Auto levy is to be generated. For example if the FIDM Analyzer runs on August 20, 2005, any voluntary payments made from January 27 through August 19 will be counted. All account types will be passed through this portion of the analyzer and are eligible for 'good paying customer' status review.

p) *The analyzer will review the reported account status and process the match accordingly.* Matches with 'closed' accounts will not be processed through the FIDM

Analyzer program. Matches with 'open' and 'status not reported' accounts will be processed. Matches reported as 'inactive' accounts will go to the Manual FIDM list for further review.

- Voluntary payments include funds received from personal checks, money order, income assignments and unemployment.
- Voluntary payments **do not** include tax offsets, FIDM and lump sum workers compensation settlements.

Auto FIDM Checklist

If criteria for Automated FIDM levy are met, all *Notice of Levy* and associated documents are generated and sent automatically to the FI and NCP only. (The NCPs are instructed in the Obligor's copy of the *Notice of Levy* document [F06] that they are to notify any NOJAH(s) about the levy action.) District offices are informed of the levy actions in order to be prepared for possible requests for review.

*****Parties have 15 calendar days to respond to levy action*****

If NCP or NOJAH responds to levy action:

_____ 1. Present the request for an Administrative Review to State's Attorney. Review to be completed within 10 days of request being sent in by NCP or NOJAH.
_____ 2. Send *Notice of Review Decision* (F08) to NCP and/or NOJAH.
_____ 3. If Attorney releases levy, send Full or Partial Levy Release document (F10) to NCP's FI. Copy also to go to NCP and/or NOJAH.

After Administrative Review has been completed, NCP and NOJAH have 15 days to request an administrative hearing. If NCP and/or NOJAH do not respond to the levy action, DHS can release money as soon as it has been received from the FI (which will be after the 21 day holding period).

Oklahoma uses the CSED mainframe system to create and process the FIDM inquiry files that are sent using either Connect Direct or tape (soon to be replaced by FTP) formats. The FIDM match files are then processed through the mainframe to analyze them and then produce either Auto levies or updates to the Manual FIDM review lists.

States interested in implementing similar functionality need the dedicated programming and transmission methods for creating and sending FIDM inquiry files and programming for whatever method they decide to employ to automate their FIDM levy/garnishment system. Oklahoma was able to build programming into its mainframe system to handle all aspects of the FIDM process.

Oklahoma established a Process Improvement Team to create and implement the new Auto FIDM programming. The team consisted of management, workers and programmers to develop the system. From initiation to implantation statewide, the time frame took one year.

Current FIDM System(s) Functionality

For the in-state FIDM matches, a quarterly report is issued by IDEC with the list of participating FIs indicating whether they had sent in their quarterly match file. In most instances an explanation is provided as to why a match report was not sent in for that quarter (new service provider, FI merged, etc.). If an FI has repeatedly not participated in the matching process and has technical difficulties, either the FIDM Unit or a representative from IDEC will contact the FI to see what the problems are and how to get them resolved.

Oklahoma uses the lists provided by OCSE and IDEC that contain the FIs that will accept direct levies from outside of their State. The lists are not incorporated into the Auto levy system.

All FIDM matches initially go through the FIDM Analyzer program to determine if they qualify as Auto levies. Those that do not qualify for Auto levy status go to the Manual list for further review and if they qualify, will be initiated by workers in the local offices.

The Auto FIDM Analyzer program is run each Tuesday morning. All MSFIDM matches that are received during the previous week will be included in the Tuesday run. In-state FIDM matches that qualify for the Auto process will be spread out over a 10 week time period. At the beginning of the quarter, the analyzer will first process levies for checking accounts followed by savings accounts. Since these types of accounts have the most activity, the first levies of the quarter will be generated in these areas. Once the levies on the checking and savings accounts have been generated, other types of accounts (CD, IRAs, etc.) will have levies generated.

The Auto FIDM Analyzer program looks for the State where the account is located and not the address of the FI.   One of the steps in the Auto FIDM Analyzer programming is to verify the State where the funds are located. If the funds are located in a State that accepts direct levy, such as DE, IL, MA, MI, NJ, NM, NY, NC, SC and TX, and the match successfully passes through all of the other steps in the process, an Auto FIDM levy will be generated.

Oklahoma's Auto levy system does not have the capability to generate Freeze and Seize notices for FIs not doing business in the State, but local office workers are made aware of institutions outside of the State that will accept direct levies, such as Wachovia, Fifth Third Bancorp and Compass Bank.

Oklahoma's Auto levy system is not capable of automatically generating AEI requests. When it is necessary to generate an AEI request, the State either uses the traditional paper method of sending a UIFSA transmittal #1 with related documentation to those States not participating in IDEC's AEI process, or uses the IDEC electronic version for the 13 States currently using IDEC's AEI functionality.

To expedite processing of levies in States that allow for direct levy by affirmation or cover letter, Oklahoma has had its levy forms and procedures reviewed by those States' governing authorities. In Texas, the Office of the Attorney General reviewed Oklahoma's FIDM procedures to verify that they are in compliance with Texas's levy laws. Also, the State of Michigan has reviewed Oklahoma's overall arrears collection and levy processes. However, most FIs in States that allow for direct levy are familiar with their own State laws and will defer to the State that generated the levy and their levy laws and procedures.

Currently, Oklahoma does not have the capability of electronically transmitting Freeze and Seize notices to FIs, but Oklahoma has been speaking with other larger institutions within the State, such as Arvest Bank and Bank of Oklahoma, regarding developing such a method in the future. If the other State is accepting AEI requests, Oklahoma staff will send a referral either via the IDEC website or using the paper UIFSA transmittal 1 method.

All AEI transmittals will be generated by a worker using either the IDEC website or UIFSA transmittal 1 forms.

For the States within IDEC, the AEI website includes the thresholds for all of the participating States. When a referral is sent, it is processed through the threshold requirements of the assisting State to determine if an AEI referral is possible. For all other States, a list of their AEI criteria is maintained for workers to review and determine if an AEI referral is possible.

Oklahoma has not automated the "back-end" of the FIDM Freeze and Seize process. For example, Oklahoma's system does not automatically search to determine if payments have been made on the case and remove the case from the FIDM match file, release the freeze action and/or stop the seizure. This is partially due to the fact that Oklahoma levies are good for 60 days only, so as far as the FI is concerned, the levy process stops automatically and no further documentation from CSED is necessary. All FIDM funds upon receipt go into undistributed status and the local office can make a determination as to when and how the funds are to be processed.

Oklahoma uses the information received from a FIDM match for other child support purposes. As part of the Auto FIDM analyzer program, a list of new addresses received from the FIs is created and the information from this list is compared to the address already on the system. If a new address is found, then it will be included on the system and a verification letter will be sent to confirm the new information. Oklahoma has also used the procedures for automating the FIDM process as a road map for automating other enforcement remedies.

The Auto FIDM levies are printed in the main DHS Print Center that forwards the notices to the DHS Mail Center that processes the notices for mailing. Due to the nature of the FIDM levy process, there is more hands-on control and oversight when dealing with these documents than with other notices generated by CSED. For example, sometimes there is

a need to pull Auto FIDM levies due to different forwarding requirements. Wells Fargo levies need to go through the Texas FIDM Unit before Wells will accept them from Oklahoma.

Oklahoma uses a centralized FIDM process when Auto FIDM levies are generated. All FIDM matches upon receipt will go through the analyzer and if they qualify to go Auto, the levies will be generated at a central location and mailed to the appropriate FIs. Once the Auto levy notice has been mailed to the FI, the local office will handle all aspects of the levy process from that time (review and hearing requests). All matches that do not go Auto are handled by the local offices and they will generate Manual levies, if appropriate.

The FIDM unit has a dedicated toll free 800 number for FI use as well as an e-mail address they can use regarding questions and issues that arise from levy actions.

Training is made available periodically, primarily for new workers. Also, updates on direct levy States and FIs are given to the local office FIDM Liaisons when necessary.

We have considered asking the legislature to make Oklahoma a State that accepts direct levy. However, no new FIDM proposal is being planned for this legislative session.

We have updated the Auto levy process to include 'Cash Balance' accounts. The balance thresholds have remained the same since inception of the Auto FIDM program.

Initially, the Auto FIDM analyzer programming included a step that would look to see if case balance verification was performed. The programming would verify that the Balance Verification Date (BVD) indicator was 'yes' before an Auto levy was generated. This requirement was in the programming for the first 3 years of operation. Since that time, confidence in the case balance amounts increased and that step in the programming was removed in 2005.

Joint Account Holders

The notice of levy document instructs obligors that it is their responsibility to inform any and all parties that are affected by the levy action. Both the obligor and joint account holder have the right to request an administrative review and an administrative hearing if deemed necessary to resolve levy issues.

In most cases, a joint account holder is given a warning that if the same account is levied in the future, with both parties' names still listed on the account, all of the funds may be taken even though they belong to the joint account holder.

Oklahoma FIDM Procedures

Oklahoma uses a one step process for freezing and seizing an account. Only one Notice of Levy will be generated at the beginning of the process that specifies the time frames in which funds are to be held and then forwarded by the FI to CSED.

Oklahoma's Notice of Levy document acts as both a freeze and seize notice, so it is a one step process.

The CARE Customer Service unit handles all manner of incoming calls from customers. The CARE staff has been trained with scripts that they use to provide the necessary information to the NCPs and joint account holders when they call with questions regarding CSED's FIDM levy actions.

Currently, there are no plans to increase the number of days that the FIDM Analyzer program is run. The Auto levies will still be generated once a week, but the Manual levies can be produced at any time.

All FIDM matches initially go through the FIDM analyzer program to establish which will qualify as Auto levies. Matches that do not qualify for the Auto levy process are reviewed by the local offices to determine if a Manual levy is still possible. The far greater amount of activity is on the Auto side, but there is still a significant number of levies generated manually.

The local offices receive a list of FIDM matches that did not go Auto on a weekly basis. They also receive three other lists of manual FIDM matches to review. These lists consist of the "Top 10 matches based upon account balances," "Top 10 matches based upon past due balances," and the "Manual FIDM Payoff list." Local offices review these lists and if they meet with FIDM levy criteria, they can be generated and sent from their office.

The screening process for levies includes the use of "Good Paying Customer" criteria. This criteria is based on the NCP making voluntary payments equaling 92% of what is owed over a 6 month time frame prior to the levy being generated. This is in addition to the NCP being 90 days past due in child support payments. The Oklahoma FIDM legislation only makes reference to the NCPs being in "noncompliance if they fail to make payments required by a child support order in an amount equal to the child support payable for at least ninety (90) days."

There has been no change in FIDM staff size at the State Office level. All work in relation to IDEC is handled by the FIDM Coordinator assisted by programming staff when necessary. The only area where more manpower is necessary with FIDM levies is at the local office level with the use of the Auto levy process. Since more levies are generated using this method, the local office may see a need to dedicate more manpower hours to working the levy process.

The role/activities of the case workers in the FIDM process are not affected by Oklahoma's membership in IDEC. The only thing that has affected their role/activities is the processing and volume of levies that are generated from the Auto FIDM Analyzer programming. The workers will not have to spend as much time researching cases and producing documents, but they may be spending more time on levy reviews and customer contacts.

Below is shown the progression of collections for the FIDM program since its inception in 2000.

2000	$373,379.91
2001	$930,709.36
2002	$1,079,906.89*
2003	$1,441,132.23
2004	$1,827,897.41
2005	$3,137,053.83
2006	$3,170,144.89
Total	$11,960,224.52

*2002 is the first year of the Auto FIDM levy program. The program was initiated during the 4th quarter of that year.

The collections were increasing until 2005. Since that time, they have leveled out at approximately $3 million per year.

The State does not have specific collections numbers on how the levy process has affected overall arrears collections. But evidence provided from local office attorneys and staff indicated that the use of FIDM levies assisted with finding employers for some of our harder to reach NCPs. Also, the number of lump sum payments to close out cases has seen an increase. Apparently NCPs do not like having their bank accounts attached and some want to be cooperative to avoid an additional levy.

Oklahoma collections for 2006 in the following areas were as follows:
IRS:	**$24,433,627**
State tax intercept:	**$4,365,824**
Wage withholding:	**$162,310,777**

The State is considering the following minor changes to our FIDM process:
1. Adding specific FIs to the list of States that already allow for direct levy. This could be done by having the FIDM Analyzer program search for specific FEINs belonging to the FIs.
2. Increasing the frequency of running In-state FIDM matches through the FIDM analyzer program from once a quarter to once a month. This would provide

              for fresher InState FIDM matches to be run through the Auto levy
              programming.

The FIDM process has progressed very well. Even though collections have leveled out, we have seen a marked improvement since adding the Auto FIDM Analyzer programming to our levy process. More Manual levies are also being generated Statewide due to improved training and coordination with the local offices.

Since the 4th quarter of 2005, the final update to the programming has been in effect. This includes an updated version of the 'good paying customer' criteria that includes all account types going through this step of the program. The number of complaints has declined and collections for each quarter have been consistent. On average, $500K in FIDM collections per quarter are attributed to the Auto levy process. The FIs are familiar with the quarterly operation and have established their own in-house policies for handling the levies. A lot of the trouble areas in implementing a complicated program have been addressed and the process has smoothed out. Everyone that is involved in the process understands that their part of the chain, from the programmers to the print shop/mail room and the local offices, is crucial to a successful operation.

Oklahoma staff learned a lot in operating an automated enforcement system from how the Auto FIDM Analyzer program came on line. Initially, we did not foresee all of the issues and problems that would arise from automating the levy process (production control, mass printing of levy documents and their mailing) and the after effects if not dealt with properly. Since implementation of the Auto FIDM program in 2002, a lot of lessons have been learned in all of these areas. Updates are still ongoing but they are not needed as often.

Oklahoma staff's advice is to get a better understanding of all areas that your automated program will affect. When we initiated the Auto FIDM program, we did not understand production control issues, printing jobs or mass mail handling problems. We believed that once the programming was in place, everything would be smooth sailing. Unfortunately, that did not happen. One of the biggest problems was that the people handling the mailing of the levy documents were not familiar with the levy forms. Instead of the NCPs getting their notices, the FIs would get a second set of levies. This happened because the Notice of Levy form with the FI's address went into the front of the NCP's envelope instead of the form with his address.

Oklahoma is a small State population-wise and we believe that our FIDM solution could work for similar sized States. Other larger States such as Texas may be better geared for a more centralized FIDM operation. To implement a FIDM system similar to what Oklahoma is using, a State needs the ability to generate levies on a centralized basis. It should also have dedicated staff in local offices trained to handle levy review requests as well as generate Manual levies when the necessity arises. This does not always require people dedicated to working the levies solely, but it does require having people familiar with the processes to handle the increased volume of work that can arise at the beginning of a levy quarter. The current FIDM operation that Oklahoma uses relieves the local

offices of having to research and generate the levy documents to get the process started. With the use of the Auto levy process, the cases that need the least effort to get a levy in place have that work done by the system.

We would also advise other States to bring as many groups as possible into the initial programming stage (programmers, local office staff, State office staff, FIs) to get their ideas and to explain to them what you want to have accomplished. Ask other States who have already implemented similar programs what problems they have experienced. Chances are the same situations will arise all over again, such as programming problems, mail issues, etc…

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                                                      Center for Coordinated Programs
                                                      P.O. Box 53552
                                                      Oklahoma City, OK 73152

Appendix A – Performance Improvement Matrix

Statistic	Explanation	Prior to Automation	After Automation
Total FIDM in-State matches for year Total MS-FIDM matches for year Total FIDM matches from a FIDM consortia Total FIDM matches in other States that permit direct levy	Matches compared to collections in these various categories may assist in determining whether they are cost-effective.		
Total FIDM collections dollar amount by defined period	It is essential to know the bottom line amount that results from enhancing/implementing automation to support FIDM: a monthly or even yearly tally should suffice.		
Total settlement collections dollar amount by defined period	It is essential to know the bottom line amount of settlements that results from enhancing/implementing automation to support FIDM: a monthly or even yearly tally should suffice.		
Percentage of total CS collections that result from FIDM (levy and settlements) by defined period	It would be desirable to know if the actual FIDM collections are increasing or decreasing as a percentage of total CS collections.		
Average dollar amount collected by case	It may prove valuable to know the actual dollar amounts from each case that result from levy and settlement.		
Total levy amount collected by region/local office	This metric will prove to be a good management tool to look for under-achieving regions/offices (note that capturing these numbers can then be used to derive many of the other collection statistics).		
Total settlement amount collected resulting from FIDM cases by region/local office	This metric will prove to be a good management tool to look for under-achieving regions/offices (note that capturing these numbers can then be used to derive many of the other collection statistics).		

Statistic	Explanation	Prior to Automation	After Automation
OCSE 34A Line 2d	Amount received as "Assisting" State for AEI		
OCSE 34A Line 2f	Amount received as initiating State in Interstate or AEI request		

Appendix B – UIFSA Transmittal Matrix

State	Accept UIFSA Transmittal # 3	Address for receipt of UIFSA Transmittal # 3	Notes
Alabama	See Notes	Central Registry Child Support Enforcement Division Attn: FIDM Unit 50 Ripley Street Montgomery, Al 36130	AL requires UIFSA Transmittal # 1 supplemented by certified copies of the support order and pay record.
Alaska	Y	Central Registry, Child Support Enforcement Division 550 West 7th Ave. Suite 312 Anchorage, AK 99501	
Arizona	Y	Central Registry P.O. Box 40458 Phoenix, AZ 85067-0458	AZ will accept UIFSA Transmittal # 1. AZ will open a case, attempt to seize and distribute money, and then close the case immediately after, if appropriate. AZ requires a copy of the court order and a copy of the payment record.
Arkansas	See Notes	Office of Child Support Enforcement Lien/Levy Section P.O. Box 8133 Little Rock, AR 72203	AR will accept UIFSA #3 with a certified copy of the order and arrears. AR will not issue levies on accounts if the NCP has paid in the last 60 days.
Connecticut	Y	Dept. of Social Services Bureau of Child Support Enforcement 25 Sigourney St. 10th Fl Hartford, CT 06106 Attn: FIDM Coord.	
D.C.	Y	Cynthia Rawls Child Support Services Division, Legal Services 441 4th St. NW, Suite 650 Washington, DC 20001	States must provide a copy of the order and payment history
Idaho	See Notes	Idaho Dept. of Health & Welfare Central Registry P.O. Box 83720 Boise, ID 83720-0036	ID will accept UIFSA Transmittal # 1. States must provide a certified copy of the order and payment record. States must also supply a registration Statement from the CP. ID will register the order as there is no administrative process in place.

State	Accept UIFSA Transmittal # 3	Address for receipt of UIFSA Transmittal # 3	Notes
Illinois	Y	Interstate Unit 509 S. 6th St. 5th FL Springfield, IL 62701	The FI(s) must be holding at least $300 in an account of the non-custodial parent and at least $1,000 is owed in past due support. States must also provide certified copies of all relevant court orders and a payment history.
Kentucky	See Notes	Central Registry Division of Child Support P.O. Box 2150 Frankford, KY 40602-2150	Technically, the answer is No; however KY will attempt an AEI action for FIDM. In order to initiate a case on the State system, KY needs Transmittal # 1, a certified copy of the orders, a payment record and/or affidavit of arrears. AEI needs to be boldly written on the 1st page of Transmittal # 1.
Louisiana	Y	Support Enforcement Services P.O. Box 94065 Baton Rouge, LA 70804-4065	
Maine	Y	Cynthia A. Banks Central Office Supervisor Dept. of Health & Human Services Division of Support Enforcement & Recovery 268 Whitten Rd. Augusta, ME 04333	If the FIs do not accept direct levies, a transmittal # 3 should be sent. It should include a certified copy of the Order, arrears Statement and payment history.
Maryland	Y	Sheryl Pierce Lewis Child Support Enforcement Administration Central Registry 311 W. Saratoga St. 3rd FL Baltimore, MD 21201	
Massachusetts	Y	Massachusetts Dept. of Revenue Child Support Enforcement Customer Service Bureau P.O. Box 7057 Boston, MA 02204	If FI's do not direct levies, States should send a Transmittal # 3 and levy packet, which should also include a certified copy of the order, arrears Statement, and payment history, to the address listed.

State	Accept UIFSA Transmittal # 3	Address for receipt of UIFSA Transmittal # 3	Notes
Michigan	See Notes	OCS/CEU P.O. Box 30744 Lansing, MI 48909-8244	MI will accept a Transmittal #3, although it is not the preferred way. MI prefers to get the other State's lien forms directly to CEU. Accepting #3 will only delay the process, as it will need to go through Central Registry before processing by CEU.
Mississippi	Y	Debra Johnson-Cockrell Mississippi Dept. of Human Services Division of Child Support Enforcement 750 N. State St. Jackson, MS 39202	Yes, provided that there is attached documentation indicating that the court file was recently reviewed to ensure that there are no subsequent orders that would affect the arrearage amount.
Missouri	See Notes	Elaine Shortridge, Office Mgr. Interstate Office, Special Collections P.O. Box 1468 Jefferson City, MO 65102-1468	MO will not accept Limited Service/AEI Requests, but will accept Transmittal # 2 and # 1 (# 1 for full interstate cases) sent to the address listed.
Montana	Y	Montana Interstate Unit P.O. Box 202943 Helena, MT 59620-2943	Montana requires the following: Separate request for each case with the same obligor/certification that the obligor and SSN are correctly identified/certification that additional due process requirements of the requesting State have been met/Certification that the amount of arrears is correct/Debt comp. worksheet/Requesting State case number/obligor's name,address,SSN,DOB, & any aliases/names of obligee and children /certified copy of the support order/amount of the monthly support obligation/date of last payment/payment address/payment address and FIPS code. If seizure only, asset specifications (type,location,amount,payor or holder). If non-MT support order, upon request, exemplified copy of the support order.
Nebraska	Y	NE DHHS CSE Central Registry P.O. Box 94728 Lincoln, NE 68509-4728	The transmittal must include all of the information NE needs to take action. Please include the information which is in Transmittal #1. NE also needs a copy of the support order and a certified arrearage (and title of the person certifying the amount).

State	Accept UIFSA Transmittal # 3	Address for receipt of UIFSA Transmittal # 3	Notes
New Hampshire	Y	State of New Hampshire DHHS Division of Child Support Services Central Registry 129 Pleasant St. Concord, NH 03301	
New Jersey	Y	State of New Jersey Division of Family Development FIDM Unit P.O. Box 709 Trenton, NJ 08625	FIs in NJ will accept a direct levy and therefore it is recommended that a direct levy be attempted first. If the FI doesn't respond, the UIFSA Transmittal should be sent to the State.
New Mexico	Y	CSED/FIDM Unit P.O. Box 5212 Santa Fe, NM 87502	
New York	See Notes		NY banks are supposed to accept direct levies from other States (if the States follow the format required for the restraint notice). NY prefers that other States do direct levies. NY is developing a procedure to accept UIFSA Transmittal #3 from other States to freeze and seize the asset.
North Carolina	See Notes	Vickie Pope Supervisor, FIDM Unit P.O. Box 20800 Raleigh, NC 27619	Beginning in October, NC will no longer receive requests via Transmittal #3. Effective 10/3/03, any State's CSE Program must send requests to seize an FI account directly to the FI.
North Dakota	See Notes	Child Support Enforcement Agency Central Registry P.O. Box 7190 Bismarck, ND 58507-7190	ND will accept UIFSA Transmittal #1 with a certified copy of order, pay history, and bank account information. The comments should indicate "request for bank levy action only, case to be closed after collection." Following criteria applies: Administrative lien: the NCP owes past due child support in an amount greater than two times the current support obligation or $2,000, whichever is less. Judicial execution: a judgment has been docketed but there are no State requirements regarding the amount of delinquency. Administrative execution: the NCP owes past due child support in an amount greater than two times the current support obligation or $2,000, whichever is less.

State	Accept UIFSA Transmittal # 3	Address for receipt of UIFSA Transmittal # 3	Notes
Ohio	Y	Interstate Central Registry Attn: Steve Norris 30 E. Broad St. 31st FL Columbus, OH 43266-0423	
Oklahoma	Y	OK Central Registry, Interstate Section Child Support Enforcement Division P.O. Box 53552 Oklahoma City, OK 73152	OK will accept UIFSA Transmittal #1 and States should clearly specify the type of action requested (FIDM). OK requires a copy of the support order, arrearage computation and necessary account or case materials. OK would like to have a contact name (preferably case worker), direct phone number (not customer service) and email address. OK will also accept electronic AEI requests from participating EPLN States. Ok will accept cases with non-TANF arrears of $500 and greater and TANF arrears of $150 or greater.
Oregon	Y	Oregon Central Registry Attn: Jenny Fraser P.O. Box 14506 Salem, OR 97309	The thresholds for MSFIDM are as follows: There must be an account balance equal to or greater than $500 and an arrears balance equal to or greater than $500 on an active case and equal to or greater than $25 on an arrears only case. A certified payment record and copy of the order are also required.
Rhode Island	Y	Dept. of Administration Division of Taxation/CSE Office of Legal Counsel 77 Dorrance St. Providence, RI 02903	
South Carolina	Y	FIDM Unit P.O. Box 1469 Columbia, SC 29209	SC State law provides full faith and credit for liens arising in other States. States could send the freeze & seize action to the SC FI. If States run into difficulty, please send the UIFSA Transmittal #3, along with an affidavit of arrears to the FIDM Unit and a written assurance that a lien has arisen under the initiating State's law and that due process requirements have been met. SC does not require transmittals #1 or #3 with FIDM requests from other States. SC requests that States send their lien/levy documents, to which SC will attach a cover letter to the receiving FI. It's a simple process that conforms to SC statute and SC has been doing this for at least two years successfully.

State	Accept UIFSA Transmittal # 3	Address for receipt of UIFSA Transmittal # 3	Notes
South Dakota	See Notes	Child Support Enforcement Attn: FIDM Contact 700 Governors DR. Pierre, SD 57501-2291	SD's laws allow for a lump sum withholding order to be issued on an account at an FI. Therefore, SD requires UIFSA Transmittal #1 to be sent to the Central Registry. SD also requires a certified copy of all orders and affidavit of arrearages. If the NCP is making payments through wage withholding, the account balance must be at least $100. Discretion will be used when the match is with a checking account that is used to conduct daily financial business. If the NCP is receiving SSI or is on welfare, a freeze and seize action will not occur unless an account with $1,000 or more is located. If the NCP has a driver or professional license agreement or court order payment on arrears and is currently under the agreement/order, SD will not take action against the account unless the balance is in excess of $5,000.
Texas	Y	Office of the Attorney General of Texas Attn: Child Support Division/ICR P.O. Box 12017 Austin, TX 78711-2017	TX will assist other States in collections through FIDM provided the following criteria are met: Arrears of $500 or more Account balance of $500 or more Account and arrears have been verified by originating State Transmittal # 1 with copy of obligation order Direct phone number of State worker must be provided Send a month by month, year by year payment record Note: Any request received without the aforementioned information will be returned to the originating State.
Utah	Y	State of Utah Office of Recovery Services P.O. Box 45033 Salt Lake City, UT 84145-0333	
Washington	Y	Division of Child Support Attn: Mark Mintzer P.O. Box 9162 Olympia, WA 98507-9162	State must indicate manually on the form that the request is a Non-IV-D AEI request. State must provide the names and dates of birth of the obligor's children on the request. State must indicate that the request is being made to take action on an account identified through MSFIDM. Under Section II of the form, State must indicate the certified debt amount and should indicate the account information and the levy address for the asset the State is requesting that Washington State seize. Please make sure to include order information: date order entered, where order entered, amount of order and whether it is an administrative or judicial support order.

State	Accept UIFSA Transmittal # 3	Address for receipt of UIFSA Transmittal # 3	Notes
West Virginia	Y	WV BCSE Attn: Margarette Clark 350 Capitol St. RM 147 Charleston, WV 25301-3703	WV will accept a Transmittal #3; however, we must also have a certified copy of the court order and a certified pay history prior to any action on an account.
Wyoming	Y	Wyoming Central Registry 2300 Capital Avenue Hathaway Bldg 3rd Fl Cheyenne, WY 82003 Attn: Judy Newton	

Several States indicated that they utilize UIFSA Transmittal #1 for transmitting AEI requests. Please note that Transmittal #1 is intended for true interstate cases. We remind States that AEI is meant to be a limited service request and not a full interstate case, so States might want to be especially clear in their communications with other States when using the Transmittal #1 forms for AEI.

Appendix C – MSFIDM Levy Process Data Elements and Definitions

This is the work product of the MSFIDM workgroup from 2003. It includes a suggested notice of levy to FIs, suggested data elements for an MSFIDM levy process and record layout for an earlier AEI pilot utilizing the Federal Case Registry. Although it was developed for an MSFIDM legislative levy process which has not been enacted, some of the research and recommended data elements could be used as an AEI Data model for States and Territories that voluntarily agree on an AEI data exchange.

NOTICE OF LEVY TO FI

Date: _____

MSFI Name
MSFI Mailing Address
MSFI City, State ZIP
MSFI TIN: 12-3654923

Obligor Name:	Jane R. Debtor	Levy Amount: $_____
MSFI Matched Name:	Jane R. Smith	
Obligor SSN:	123-45-6789	**State Contact Information:**
State Case ID:	123456	Name: Sally Caseworker
		Phone Number: 111-555-1212

The State of _____ has certified that the account holder named above owes $_____ in past-due child support. TAKE NOTICE that pursuant to ENTER STATE LEGAL CITE, you are hereby notified that the following accounts [INSERT ACCOUNT NUMBERS] OR all accounts identified by your institution as belonging to the obligor, EXCEPT [INSERT STATE SPECIFIC EXCEPTIONS] are levied upon for payment of past-due child support *up to the amount of support past-due*.

You shall immediately freeze funds in the amount identified above as the Levy Amount. If the total amount of all accounts exceeds the levy amount, only the amount shown is subject to levy. After the account(s) is frozen,

- ❑ Funds deposited into the account holder's account(s) after the freeze are not subject to this levy action.
- ❑ Funds deposited into the account holder's account(s) are subject to this levy action until (DATE)_____ .

Unless you receive a notification instructing you to release the freeze or other instructions from OCSE, you must remit the levied funds on the thirty-first (31) calendar day from receipt of this levy to:

OCSE—EFT/EDI Information

You must include the obligor's name, SSN and tracking number on the funds remitted. If you are remitting funds for more than one obligor, the amounts may be combined and remitted in a single transaction with identifying information for each amount submitted, including the obligor's name, SSN and tracking number associated with the amount.

If there are questions, **FIs** should contact INSERT OCSE CONTACT INFORMATION and **Obligors and/or other account holders** should contact the State contact listed above.

Following remittance of funds, the freeze on the account(s) must be released.

If there are no funds and/or account(s) available for levy, please notify OCSE *[specify timeframe]* by INSERT MEANS OF NOTIFICATION.

MSFIDM LEVY PROCESS DATA ELEMENTS AND DEFINITIONS		
Field Name	Definition	Data Source
Amount Frozen	The combined total dollar amount the MSFI froze in the obligor's account(s). This amount is as of the time the account(s) were frozen.	
Amount Seized	The amount the MSFI takes from the obligor's account(s) and sends to OCSE on the 30th day.	
Arrearage Amount	The dollar amount, in whole dollars only that the obligor is in arrears.	Federal Offset User Guide
Case ID	The identification number for the case submitted. The field is used by the States only.	Federal Offset User Guide
Date Seized	The date the money was seized from the obligor's account(s) by the MSFI.	
Freeze Date	The date the MSFI froze the obligor's account(s).	
Inquiry Date	This field will contain the date the MSFI Inquiry File was generated in CCYYMM format.	MSFIDM RDS
Levy Request Amount	The total dollar amount in the obligor's account(s) that OCSE is requesting the MSFI to freeze.	
Local Code	The State assigned Local Code for the levy request. A valid three-digit numeric code for county or other local jurisdictions. The field may include a valid FIPS county code or another code assigned by the State, and will be used to provide the State contact information on the obligor levy notice.	Federal Offset User Guide
Modified Levy Amount	The adjusted dollar amount submitted on a transaction for a levy that is currently within the 30 day freeze period. This amount cannot be greater than the original Levy Request Amount or the Federal Offset Arrearage Amount.	

MSFIDM LEVY PROCESS DATA ELEMENTS AND DEFINITIONS		
Field Name	Definition	Data Source
MSFI Account Balance	This field will contain the account balance or value of the account in whole dollars if provided by the MSFI. To accommodate negative balances, the amount is returned as a signed numeric field. Brokerage firms reporting margin accounts may report the balance as either the value of the account holder's equity position or the value of the account less any borrowed amount. Zeros will appear in the field for closed accounts or if the balance was not provided by the MSFI. A '0' will appear in the MSFI Account Balance Indicator if the balance was not provided by the MSFI.	MSFIDM RDS
MSFI Account Balance Indicator	This field will contain one of the following values to indicate the status of the account balance provided by the MSFI: 0 – The Account Balance was not provided. 1 – The average account balance was provided (whether daily, monthly, etc.). 2 – The account balance as of the day the MSFI response was created.	MSFIDM RDS
MSFI Account Full Legal Title	This field will contain the full account title from the MSFI account matched for the SSN or will contain spaces if a full account title is not provided by the MSFI. The MSFI may provide this information for trust accounts or accounts with other legal titles (i.e., Law Office of…) to assist in the processing of the lien/levy request.	MSFIDM RDS

MSFIDM LEVY PROCESS DATA ELEMENTS AND DEFINITIONS		
Field Name	Definition	Data Source
MSFI Account Type	This field will contain a code to indicate the type of payee account matched by the MSFI. The valid values are: 00 – Not Applicable 01 – Savings Account 04 – Checking Demand Deposit Account 05 – Term Deposit Certificate 11 – Money Market Account 12 – IRA/Keogh Account 14 – ERISA Plan Account 16 – Cash Balances 17 – Compound Account includes investment accounts where portions of the balance are in differing funds – stock, money markets, bonds, etc. 18 – Other	MSFIDM RDS
MSFI Address	The mailing addresses where the FI is located and would like the OCSE to mail the levy request or levy release. This includes the following fields: MSFI Street Address, MSFI City, MSFI State, MSFI Zip Code and MSFI Foreign Country Indicator.	MSFIDM RDS
MSFI Contact Email Address	The e-mail address of the contact person at the MSFI. This data is supplied by the MSFI to assist with levy research.	MSFIDM RDS
MSFI Contact Name	The name of the contact person at the MSFI. This data is supplied by the MSFI to assist with levy research.	MSFIDM RDS
MSFI Contact Phone Number	The phone number of the contact person at the MSFI. This data is supplied by the MSFI to assist with levy research.	MSFIDM RDS
MSFI Matched Account 2nd Payee SSN	This field will contain a secondary account owner's SSN, if applicable. This SSN will equal the MSFI Matched Account SSN if the SSN submitted on the Inquiry File matches to a secondary account. A '1' or '2' will appear in the MSFI Payee Indicator when this number is provided. If the MSFI Payee Indicator equals '0', this field will contain spaces.	MSFIDM RDS

MSFIDM LEVY PROCESS DATA ELEMENTS AND DEFINITIONS		
Field Name	Definition	Data Source
MSFI Matched Account Location State Code	This field will contain the alphabetic State code of the State where the matched account is located.	MSFIDM RDS
MSFI Matched Account Name	This field will contain the name on the account for the SSN from the MSFI data match. The name will be returned in the format stored by the MSFI (e.g., last name, first name or first name, middle initial and last name).	MSFIDM RDS
MSFI Matched Account Payee Address	This field will contain, if available, the address from the matched MSFI account. If the MSFI has the address of the MSFI Matched SSN, it will be in this field. If the MSFI does not have the address of the MSFI Matched SSN, it may return the address for another account owner. Spaces will appear in this field if a city was not provided. This field will include the MSFI Matched Account Payee City, MSFI Matched Account Payee State, MSFI Matched Account Payee Street Address, MSFI Matched Account Payee Zip Code and MSFI Matched Account Foreign Country Indicator.	MSFIDM RDS
MSFI Matched Account Payee Date of Birth	This field will contain, if available, the date of birth of the matched account owner from the MSFI data match. The date provided may match the primary or secondary account owner. The date is in CCYYMMDD format. Zeros will appear in this field if the date of birth was not provided by the MSFI.	MSFIDM RDS
MSFI Matched Account Primary SSN	This field will contain the primary account owner's SSN if the SSN submitted on the Inquiry File matches to a secondary account. A '1' will appear in the MSFI Payee Indicator if this number is provided. If the MSFI Payee Indicator equals '0' or '2' this field will contain spaces.	MSFIDM RDS
MSFI Matched Account Status Indicator	This field will contain one of the following codes to indicate the status of the payee's account: 0 – Matched account open at the time of the MSFI match. 1 – Matched account closed at the time of the MSFI match. 2 – MSFI did not report the status of the matched account.	MSFIDM RDS

MSFIDM LEVY PROCESS DATA ELEMENTS AND DEFINITIONS		
Field Name	Definition	Data Source
MSFI Matched SSN	This field will contain the SSN provided to MSFI for the data match. The MSFI is sent only verified SSN and name combinations from the Federal Offset File eligible for the data match.	MSFIDM RDS
MSFI Name	The name of the FI where the levy request is to be submitted.	MSFIDM RDS
MSFI Name Match Flag	This field will indicate the result of the MSFI match of the person's name sent to the agency on the Inquiry File to the matched account's payee name. The valid values are: 0 – The MSFI was unable or elected not to match the last name. 1 – The first four letters of the matched account's payee last name matched the first four positions of the last name on the Inquiry File. 2 – The first four letters of the matched account's payee last name did not match the first four positions of the last name on the Inquiry File. (Note, the primary match performed by the MSFI is on the SSN submitted in the inquiry file. MSFIs are instructed to match on SSN and return matches regardless of the name match. MSFIs are, however, encouraged to do an additional comparison of the matched account payee last name to the last name on the Inquiry File to prevent the MSFI from receiving incorrect levies.)	MSFIDM RDS
MSFI Other Payee Account Name	This field will contain, if applicable, the name of the secondary payee on the matched MSFI account. If the MSFI Matched SSN is for the secondary payee on the account, this field may contain the name of the primary account owner. The name will be returned in the format stored by the MSFI (e.g., last name and first name, or, first name, middle initial and last name).	MSFIDM RDS
MSFI Payee Account Number	This field will contain the Account Number of the payee from the MSFI matched data. Spaces will appear in this field for any unused positions.	MSFIDM RDS

MSFIDM LEVY PROCESS DATA ELEMENTS AND DEFINITIONS		
Field Name	Definition	Data Source
MSFI Payee Indicator	This field will contain a code to indicate the payee's status on the matched account. The valid values are: 0 – The SSN matched the account owner who is the sole owner of the account. 1 – The SSN matched the secondary account owner. 2 – The SSN matched the primary account owner and there are secondary owners on the account.	MSFIDM RDS
MSFI Payee Last Name Control	This field will contain up to the first four positions of the last name from the payee account used by the MSFI in the name match. Spaces will appear in this field for any unused positions.	MSFIDM RDS
MSFI TIN	The valid nine-digit Taxpayer Identification Number assigned to the Multistate FI (MSFI) holding the account.	MSFIDM RDS
MSFI Trust Fund Indicator	This field will contain a code to indicate whether the matched account is a registered trust or escrow account. The valid values are: 0 – Not a registered trust/escrow account or the account is closed. 1 – UTMA/UGMA Account 2 – IOLTA Account 3 – Mortgage Escrow Account 4 – Security Deposits (including Real Estate) 5 – Other Trust/Escrow 6 – Information Not Available	MSFIDM RDS
Obligor First Name	The first name of the non-custodial parent that the levy request is being submitted for.	Federal Offset User Guide
Obligor Last Name	The last name of the non-custodial parent that the levy request is being submitted for.	Federal Offset User Guide
OCSE Contact Email Address	The e-mail address of the contact person at OCSE. This data is supplied by OCSE to the MSFI to assist with levy research.	
OCSE Contact Name	The name of the contact person at OCSE. This data is supplied by OCSE to the MSFI to assist with levy research.	

MSFIDM LEVY PROCESS DATA ELEMENTS AND DEFINITIONS		
Field Name	Definition	Data Source
OCSE Contact Phone Number	The telephone number of the OCSE contact for the MSFIDM Levy process. This data is supplied by OCSE to the MSFI to assist with levy research.	
OCSE Levy Tracking Number	A unique number to be used by OCSE for tracking each levy request.	
Reject Reason Code	The code defining the reason for the rejection of the levy request. • Invalid data (could not process request) • Account Closed • Unable to locate account • No funds (nothing to collect)	
Release Action Code	A code to identify the type of levy release. • Modified Levy Amount (must be less than arrearage amt) • Release Levy (do not collect funds and release accounts) • Early Levy (collect funds and release accounts) • Account Specific Release • Release All Levies (at all MSFIs)	
Response Action Code	A code to notify the State that the levy request was accepted or rejected. • Levy Request Accepted • Levy Request Rejected • Levy Release Rejected	
Response File Date	This field will contain the date the record was created for the State from the MSFI response. The date will be returned in CCYYMMDD format.	MSFIDM RDS
Sort State Code	This field will contain the numeric FIPS State code for the State receiving the response.	MSFIDM RDS
SSN	The Social Security number of the non-custodial parent that the levy request is being submitted for.	Federal Offset User Guide

MSFIDM LEVY PROCESS DATA ELEMENTS AND DEFINITIONS		
Field Name	Definition	Data Source
State Agency Address	Address information of the State agency. This field includes the following fields: State Agency Address Line 1, State Agency Address Line 2, State Agency Address Line 3, and State Agency Address Line 4.	Federal Offset User Guide
State Agency Email Address	The e-mail address of the State agency for levy contact.	
State Agency Name	The name of the contact office (e.g., Bureau of Child Support Enforcement).	Federal Offset User Guide
Submitting State Code	A valid two-character alphabetic postal abbreviation for the State submitting the case.	Federal Offset User Guide
Telephone Number	The area code and phone number of the State or local agency contact (i.e., (301) 555-1212).	Federal Offset User Guide

These are the data elements and definitions for the MSFIDM levy process that were proposed by the MSFIDM workgroup:

MSFIDM LEVY PROCESS DATA ELEMENTS AND DEFINITIONS		
Field Name	Definition	Data Source
Amount Frozen	The combined total dollar amount the MSFI froze in the obligor's account(s). This amount is as of the time the account(s) were frozen.	
Amount Seized	The amount the MSFI takes from the obligor's account(s) and sends to OCSE on the 30th day.	
Arrearage Amount	The dollar amount, in whole dollars only that the obligor is in arrears.	Federal Offset User Guide
Case ID	The identification number for the case submitted. The field is used by the States only.	Federal Offset User Guide
Date Seized	The date the money was seized from the obligor's account(s) by the MSFI.	
Freeze Date	The date the MSFI froze the obligor's account(s).	
Inquiry Date	This field will contain the date the MSFI Inquiry File was generated in CCYYMM format.	MSFIDM RDS
Levy Request Amount	The total dollar amount in the obligor's account(s) that OCSE is requesting the MSFI to freeze.	
Local Code	The State assigned Local Code for the levy request. A valid three-digit numeric code for county or other local jurisdictions. The field may include a valid FIPS county code or another code assigned by the State, and will be used to provide the State contact information on the obligor levy notice.	Federal Offset User Guide
Modified Levy Amount	The adjusted dollar amount submitted on a transaction for a levy that is currently within the 30 day freeze period. This amount cannot be greater than the original Levy Request Amount or the Federal Offset Arrearage Amount.	

MSFIDM LEVY PROCESS DATA ELEMENTS AND DEFINITIONS		
Field Name	Definition	Data Source
MSFI Account Balance	This field will contain the account balance or value of the account in whole dollars if provided by the MSFI. To accommodate negative balances, the amount is returned as a signed numeric field. Brokerage firms reporting margin accounts may report the balance as either the value of the account holder's equity position or the value of the account less any borrowed amount. Zeros will appear in the field for closed accounts or if the balance was not provided by the MSFI. A '0' will appear in the MSFI Account Balance Indicator if the balance was not provided by the MSFI.	MSFIDM RDS
MSFI Account Balance Indicator	This field will contain one of the following values to indicate the status of the account balance provided by the MSFI: 0 – The Account Balance was not provided. 1 – The average account balance was provided (whether daily, monthly, etc.). 2 – The account balance as of the day the MSFI response was created.	MSFIDM RDS
MSFI Account Full Legal Title	This field will contain the full account title from the MSFI account matched for the SSN or will contain spaces if a full account title is not provided by the MSFI. The MSFI may provide this information for trust accounts or accounts with other legal titles (i.e., Law Office of…) to assist in the processing of the lien/levy request.	MSFIDM RDS

MSFIDM LEVY PROCESS DATA ELEMENTS AND DEFINITIONS		
Field Name	Definition	Data Source
MSFI Account Type	This field will contain a code to indicate the type of payee account matched by the MSFI. The valid values are: 00 – Not Applicable 01 – Savings Account 04 – Checking Demand Deposit Account 05 – Term Deposit Certificate 11 – Money Market Account 12 – IRA/Keogh Account 14 – ERISA Plan Account 16 – Cash Balances 17 – Compound Account includes investment accounts where portions of the balance are in differing funds – stock, money markets, bonds, etc. 18 – Other	MSFIDM RDS
MSFI Address	The mailing addresses where the FI is located and would like the OCSE to mail the levy request or levy release. This includes the following fields: MSFI Street Address, MSFI City, MSFI State, MSFI Zip Code and MSFI Foreign Country Indicator.	MSFIDM RDS
MSFI Contact Email Address	The e-mail address of the contact person at the MSFI. This data is supplied by the MSFI to assist with levy research.	MSFIDM RDS
MSFI Contact Name	The name of the contact person at the MSFI. This data is supplied by the MSFI to assist with levy research.	MSFIDM RDS
MSFI Contact Phone Number	The phone number of the contact person at the MSFI. This data is supplied by the MSFI to assist with levy research.	MSFIDM RDS
MSFI Matched Account 2nd Payee SSN	This field will contain a secondary account owner's SSN, if applicable. This SSN will equal the MSFI Matched Account SSN if the SSN submitted on the Inquiry File matches to a secondary account. A '1' or '2' will appear in the MSFI Payee Indicator when this number is provided. If the MSFI Payee Indicator equals '0' this field will contain spaces.	MSFIDM RDS

MSFIDM LEVY PROCESS DATA ELEMENTS AND DEFINITIONS		
Field Name	Definition	Data Source
MSFI Matched Account Location State Code	This field will contain the alphabetic State code of the State where the matched account is located.	MSFIDM RDS
MSFI Matched Account Name	This field will contain the name on the account for the SSN from the MSFI data match. The name will be returned in the format stored by the MSFI (e.g., last name, first name or first name, middle initial and last name).	MSFIDM RDS
MSFI Matched Account Payee Address	This field will contain, if available, the address from the matched MSFI account. If the MSFI has the address of the MSFI Matched SSN, it will be in this field. If the MSFI does not have the address of the MSFI Matched SSN, it may return the address for another account owner. Spaces will appear in this field if a city was not provided. This field will include the MSFI Matched Account Payee City, MSFI Matched Account Payee State, MSFI Matched Account Payee Street Address, MSFI Matched Account Payee Zip Code and MSFI Matched Account Foreign Country Indicator.	MSFIDM RDS
MSFI Matched Account Payee Date of Birth	This field will contain, if available, the date of birth of the matched account owner from the MSFI data match. The date provided may match the primary or secondary account owner. The date is in CCYYMMDD format. Zeros will appear in this field if the date of birth was not provided by the MSFI.	MSFIDM RDS
MSFI Matched Account Primary SSN	This field will contain the primary account owner's SSN if the SSN submitted on the Inquiry File matches to a secondary account. A '1' will appear in the MSFI Payee Indicator if this number is provided. If the MSFI Payee Indicator equals '0' or '2' this field will contain spaces.	MSFIDM RDS
MSFI Matched Account Status Indicator	This field will contain one of the following codes to indicate the status of the payee's account: 0 – Matched account open at the time of the MSFI match. 1 – Matched account closed at the time of the MSFI match. 2 – MSFI did not report the status of the matched account.	MSFIDM RDS

MSFIDM LEVY PROCESS DATA ELEMENTS AND DEFINITIONS		
Field Name	Definition	Data Source
MSFI Matched SSN	This field will contain the SSN provided to MSFI for the data match. The MSFI is sent only verified SSN and name combinations from the Federal Offset File eligible for the data match.	MSFIDM RDS
MSFI Name	The name of the FI where the levy request is to be submitted.	MSFIDM RDS
MSFI Name Match Flag	This field will indicate the result of the MSFI match of the person's name sent to the agency on the Inquiry File to the matched account's payee name. The valid values are: 0 – The MSFI was unable or elected not to match the last name. 1 – The first four letters of the matched account's payee last name matched the first four positions of the last name on the Inquiry File. 2 – The first four letters of the matched account's payee last name did not match the first four positions of the last name on the Inquiry File. (Note, the primary match performed by the MSFI is on the SSN submitted in the inquiry file. MSFIs are instructed to match on SSN and return matches regardless of the name match. MSFIs are, however, encouraged to do an additional comparison of the matched account payee last name to the last name on the Inquiry File to prevent the MSFI from receiving incorrect levies.)	MSFIDM RDS
MSFI Other Payee Account Name	This field will contain, if applicable, the name of the secondary payee on the matched MSFI account. If the MSFI Matched SSN is for the secondary payee on the account, this field may contain the name of the primary account owner. The name will be returned in the format stored by the MSFI (e.g., last name and first name, or, first name, middle initial and last name).	MSFIDM RDS
MSFI Payee Account Number	This field will contain the Account Number of the payee from the MSFI matched data. Spaces will appear in this field for any unused positions.	MSFIDM RDS

MSFIDM LEVY PROCESS DATA ELEMENTS AND DEFINITIONS		
Field Name	Definition	Data Source
MSFI Payee Indicator	This field will contain a code to indicate the payee's status on the matched account. The valid values are: 0 – The SSN matched the account owner who is the sole owner of the account. 1 – The SSN matched the secondary account owner. 2 – The SSN matched the primary account owner and there are secondary owners on the account.	MSFIDM RDS
MSFI Payee Last Name Control	This field will contain up to the first four positions of the last name from the payee account used by the MSFI in the name match. Spaces will appear in this field for any unused positions.	MSFIDM RDS
MSFI TIN	The valid nine-digit Taxpayer Identification Number assigned to the Multistate FI (MSFI) holding the account.	MSFIDM RDS
MSFI Trust Fund Indicator	This field will contain a code to indicate whether the matched account is a registered trust or escrow account. The valid values are: 0 – Not a registered trust/escrow account or the account is closed. 1 – UTMA/UGMA Account 2 – IOLTA Account 3 – Mortgage Escrow Account 4 – Security Deposits (including Real Estate) 5 – Other Trust/Escrow 6 – Information Not Available	MSFIDM RDS
Obligor First Name	The first name of the non-custodial parent that the levy request is being submitted for.	Federal Offset User Guide
Obligor Last Name	The last name of the non-custodial parent that the levy request is being submitted for.	Federal Offset User Guide
OCSE Contact Email Address	The e-mail address of the contact person at OCSE. This data is supplied by OCSE to the MSFI to assist with levy research.	
OCSE Contact Name	The name of the contact person at OCSE. This data is supplied by OCSE to the MSFI to assist with levy research.	

MSFIDM LEVY PROCESS DATA ELEMENTS AND DEFINITIONS		
Field Name	Definition	Data Source
OCSE Contact Phone Number	The telephone number of the OCSE contact for the MSFIDM Levy process. This data is supplied by OCSE to the MSFI to assist with levy research.	
OCSE Levy Tracking Number	A unique number to be used by OCSE for tracking each levy request.	
Reject Reason Code	The code defining the reason for the rejection of the levy request. • Invalid data (could not process request) • Account Closed • Unable to locate account • No funds (nothing to collect)	
Release Action Code	A code to identify the type of levy release. • Modified Levy Amount (must be less than arrearage amt) • Release Levy (do not collect funds and release accounts) • Early Levy (collect funds and release accounts) • Account Specific Release • Release All Levies (at all MSFIs)	
Response Action Code	A code to notify the State that the levy request was accepted or rejected. • Levy Request Accepted • Levy Request Rejected • Levy Release Rejected	
Response File Date	This field will contain the date the record was created for the State from the MSFI response. The date will be returned in CCYYMMDD format.	MSFIDM RDS
Sort State Code	This field will contain the numeric FIPS State code for the State receiving the response.	MSFIDM RDS
SSN	The Social Security number of the non-custodial parent that the levy request is being submitted for.	Federal Offset User Guide

MSFIDM LEVY PROCESS DATA ELEMENTS AND DEFINITIONS		
Field Name	Definition	Data Source
State Agency Address	Address information of the State agency. This field includes the following fields: State Agency Address Line 1, State Agency Address Line 2, State Agency Address Line 3, and State Agency Address Line 4.	Federal Offset User Guide
State Agency Email Address	The e-mail address of the State agency for levy contact.	
State Agency Name	The name of the contact office (e.g., Bureau of Child Support Enforcement).	Federal Offset User Guide
Submitting State Code	A valid two-character alphabetic postal abbreviation for the State submitting the case.	Federal Offset User Guide
Telephone Number	The area code and phone number of the State or local agency contact (i.e., (301) 555-1212).	Federal Offset User Guide

This is the record layout used in an earlier AEI pilot using the Federal Case Registry (FCR).

Field Name	Location	Length	A/N	Comments
FCR INTIATE AEI REQUEST PART 1 RECORD				
Record Type	1-2	2	A	Required This field must contain 'MD'.
Requesting State	3-4	2	N	Required This field must contain the two-digit numeric FIPS State Code for the State requesting the AEI action.
Assisting State	5-6	2	N	Required This field must contain the two-digit numeric FIPS State Code for the State to receive the AEI request.
Obligor's SSN	7-15	9	N	Required This field must contain the verified SSN of the Obligor. The SSN must match the SSN submitted in the FCR Initiate AEI Request Part 2 Record. It must contain the SSN used for the MSFIDM.
Requesting State Case ID	16-30	15	A/N	Required This field must contain the Requesting State Case ID in order to match response data from the Assisting State. The information included in this field must be returned in all response records created by the Assisting State.
Obligor's First Name	31-46	16	A	Required This field must contain at least one alphabetic character. No special characters or imbedded spaces can be present.
Obligor's Middle Name	47-62	16	A	Optional This field must contain spaces or alphabetic characters. No special characters or imbedded spaces can be present.
Obligor's Last Name	63-92	30	A	Required This field must contain at least one alphabetic character. No special characters or imbedded spaces, except a hyphen, can be present.

FCR INTIATE AEI REQUEST PART 1 RECORD				
Field Name	Location	Length	A/N	Comments
Arrearage Amount	93-99	7	N	Required This field must contain the arrearage amount in whole dollars. It must be right justified and zero filled. It must be greater than zeros.
Arrearage Amount Status	100	1	A	Required This field must contain one of the following values: Y – The arrearage amount provided is certified as being current as of the transmission N – The arrearage amount provided is not certified as current (reserved for future use) Note: At this time, the field must contain a 'Y'.
Arrearage Status Date	101-108	8	N	Required This field must contain the status as of date for the arrearage in CCYYMMDD format.
Due Process Served Indicator	109	1	A	Required This field must contain one of the following values: Y – Due process has been served N – Due process has not been served This field must contain a 'Y' if the Action Indicator is an 'S'.
Action Indicator	110	1	A	Required This field must contain one of the following values: S – Seize Only R – Request to initiate Search (reserved for future use) Note: At this time, the field must contain an 'S'.
Arrearage Case Type	111	1	A	Required This field must contain one of the following values: C – Current F – Former N – Never Assistance

FCR INTIATE AEI REQUEST PART 1 RECORD				
Field Name	Location	Length	A/N	Comments
UIFSA	112	1	A	Required This field must contain one of the following values: Y – This is a two State UIFSA case for the Requesting and Assisting State N – Not UIFSA Note: If the code is 'Y' the assisting State may want to check for the responding case on its system.
Obligor's Monthly Payment Amount	113-117	5	N	Conditionally Required The Assisting State may require this information. If provided, the amount must be in whole dollars. If not available, enter all zeros.
Date of Obligor's Last Payment	118-125	8	N	Conditionally Required This field must contain the date of last payment in CCYYMMDD format or spaces.
Obligor's Street Address Line 1	126-150	25	A/N	Conditionally Required This field must be present if the UIFSA code equals 'N'.
Obligor's Street Address Line 2	151-175	25	A/N	Optional This field must be spaces if the Obligor's Street Address Line 1 is spaces.
Obligor's City	176-193	18	A	Conditionally Required This field must be present if the UIFSA code equals 'N'.
Obligor's State	194-195	2	A	Conditionally Required This field must be present if the UIFSA code equals 'N'. If present, this field must contain a valid alphabetic FIPS State Code.
Obligor's Zip Code	196-204	9	A/N	Conditionally Required This field must be present if the UIFSA code equals 'N'. The first five positions must be numeric. Positions 6 through 9 must be numeric or spaces.
Obligor's Date of Birth	205-212	8	A/N	Optional If present, this field must contain the date of birth in CCYYMMDD format or spaces.
Obligor's Member ID	213-227	15	A/N	Conditionally Required This field must be present if the UIFSA code equals 'Y'.

FCR INTIATE AEI REQUEST PART 1 RECORD				
Field Name	Location	Length	A/N	Comments
UIFSA Assisting State Case ID	228-242	15	A/N	Conditionally Required This field must be present if the UIFSA code equals 'Y'.
Custodial Party's SSN	243-251	9	A/N	Conditionally Required This field must be present if the UIFSA code equals 'Y'. If present, this field must contain a valid SSN.
Custodial Party's First Name	252-267	16	A	Conditionally Required This field may be required by the Assisting State. If present, this field must contain at least one alphabetic character. No special characters or imbedded spaces can be present.
Custodial Party's Middle Name	268-283	16	A	Optional If present, this field must contain at least one alphabetic character. No special characters or imbedded spaces can be present.
Custodial Party's Last Name	284-313	30	A	Conditionally Required This field may be required by the Assisting State. If present, this field must contain at least one alphabetic character. No special characters or imbedded spaces can be present.
Order FIPS State	314-315	2	N	Required This field must contain the valid numeric FIPS State Code where the order was issued.
Order FIPS County Code	316-318	3	A/N	Optional If present, this field must contain the valid numeric FIPS County Code where the order was issued. If a valid numeric FIPS County Code is not provided, spaces can be present.
Court Docket Number	319-335	17	A/N	Conditionally Required This field may be required by the Assisting State.
Order Issued Date	336-343	8	A/N	Conditionally Required This field may be required by the Assisting State. If present, this field must contain the date the order was issued in CCYYMMDD format.

FCR INTIATE AEI REQUEST PART 1 RECORD				
Field Name	Location	Length	A/N	Comments
Order Type	344	1	A	Conditionally Required This field may be required by the Assisting State. If present, this field must contain one of the following values: A – Administrative J – Judicial
Requesting State User Field	345-359	15	A/N	Optional This field may contain information used by the Requesting State for identifying information. The information included in this field must be returned to the Requesting State in all response records created by the Assisting State.
Requesting State FIPS County Code	360-362	3	A/N	Optional This field may contain a FIPS County Code in the Requesting State for identifying information. If present, it must be positions three through five of the numeric FIPS State/Territory and County Codes. The information included in this field must be returned in all response records created by the Assisting State. If the FIPS County Code is not provided, this field will contain spaces.
Requesting State Contact First Name	363-378	16	A	Required This field must contain at least one alphabetic character. No special characters or imbedded spaces can be present.
Requesting State Contact Last Name	379-408	30	A	Required This field must contain at least one alphabetic character. No imbedded spaces or special characters, except hyphens, can be present.
Requesting State Contact Telephone Number	409-418	10	N	Required This field must be greater than zeros.
Requesting State Contact E-Mail Address	419-453	35	A/N	Optional If present, the field should be a valid Internet E-mail address.

FCR INTIATE AEI REQUEST PART 1 RECORD				
Field Name	Location	Length	A/N	Comments
Requesting State Payment Street Address Line 1	454-478	25	A/N	Required This field must contain the Requesting State's Street Address.
Requesting State Payment Street Address Line 2	479-503	25	A/N	Optional This field may contain a second Street Address line for the Requesting State.
Requesting State Payment City	504-521	18	A	Required This field must be at least two alphabetic characters.
Requesting State Payment State Code	522-523	2	A	Required This field must be a valid alphabetic State Code.
Requesting State Payment Zip Code	524-532	9	A/N	Required This field must be a valid US postal service Zip Code.
EFT Indicator	533	1	A	Required This field must contain one of the following values: Y – Remit payment via EFT N – Do not remit payment via EFT
Child's First Name	534-549	16	A	Conditionally Required This field may be required by the Assisting State. If multiple children exist for the case, the Requesting State must select just one. This field must not include imbedded spaces or special characters.
Child's Last Name	550-579	30	A	Conditionally Required This field may be required by the Assisting State. If multiple children exist for the case, the Requesting State must select just one. No imbedded spaces or special characters, except a hyphen, can be present.

FCR INTIATE AEI REQUEST PART 1 RECORD				
Field Name	Location	Length	A/N	Comments
AEI Request Date	580-587	8	N	Required This field must contain the date the AEI request was created by the Requesting State in CCYYMMDD format.
Multiple Case Indicator	588	1	A	Required This field must contain one of the following values: M – The request combines the debt for multiple cases. S – The request is for a single case.
Filler	588-640	53	A	This field will be used for future versions. For the current version, it will be all spaces.

FCR INITIATE AEI REQUEST PART 2 RECORD				
Field Name	Location	Length	A/N	Comments
Record Type	1-2	2	A	Required This field must contain the characters 'MI'.
Requesting State	3-4	2	N	Required This field must contain the two-digit numeric FIPS State Code for the State initiating the AEI request.
Assisting State	5-6	2	N	Required This field must contain the two-digit numeric FIPS State Code for the State to receive the AEI request.
Obligor's SSN	7-15	9	N	Required This field must contain the verified SSN of the Obligor. The SSN must match the SSN sent in the FCR Initiate AEI Request Part 1 Record.
Requesting State Case ID	16-30	15	A/N	Required This field must contain the Requesting State Case ID in order to match response data from the Assisting State. It must match the Requesting State Case ID sent in the FCR Initiate AEI Request Part 1 Record. The information included in this field must be returned in all response records created by the Assisting State.
Requesting State User Field	31-45	15	A/N	Optional This field may contain information used by the Requesting State for identifying information. The information included in this field must be returned to the Requesting State in all response records created by the Assisting State.
Requesting State FIPS County Code	46-48	3	A/N	Optional This field may contain a FIPS County Code in the Requesting State for identifying information. If present, it must be positions three through five of the numeric FIPS State/Territory and County Codes. The information included in this field must be returned in all response records created by the Assisting State. If the FIPS County Code is not provided, this field will contain spaces.

FCR INITIATE AEI REQUEST PART 2 RECORD				
Field Name	Location	Length	A/N	Comments
MSFI TIN	49-57	9	N	Required This field must contain the valid nine-digit Taxpayer Identification Number assigned to the MultiState FI holding the account.
MSFI Match Year/Month	58-63	6	N	Required This field must contain the date the MSFI Inquiry File was generated in CCYYMM format. For example, April 1998 would be entered as '199804'.
MSFI Name	64-103	40	A/N	Required This field must contain the name of the MSFI where the account resides and to whom the State is directed to send the lien/levy request for processing.
MSFI Street Address	104-143	40	A/N	Required This field must contain the street address where the State is directed to send the lien/levy request for processing.
MSFI City	144-172	29	A	Required This field must contain the City where the State is directed to send the lien/levy request for processing.
MSFI State	173-174	2	A	Required This field must contain the two positions alphabetic State Code for the address where the State should direct the lien/levy request for processing.
MSFI Zip Code	175-183	9	A/N	Required This field must contain the nine-digit Zip Code of the address where the State should direct the lien/levy for processing. If the four-digit extension of the Zip Code is not provided by the MSFI, the last four digits will be equal to spaces.
MSFI Foreign Country Indicator	184	1	A/N	Required This field must contain one of the following values to indicate if the MSFI address provided is a US or foreign address: 1 – The address of the MSFI is in a foreign country Space – The address of the MSFI is in the US

FCR INITIATE AEI REQUEST PART 2 RECORD				
Field Name	Location	Length	A/N	Comments
MSFI Response Date	185-192	8	N	Required This field must contain the date the record was created for the State from the MSFI response. The date will be returned in CCYYMMDD format. For example, July 18, 1999 would be entered as '19990718'.
MSFI Payee Last Name Control	193-196	4	A	Optional This field must contain up to the first four positions of the last name used by the MSFI in the name match. Spaces will appear in this field for any unused positions.
MSFI Payee Account Number	197-216	20	A/N	Required This field must contain the Account Number of the payee from the MSFI matched data. It must be left justified with spaces in this field for any unused positions.
MSFI Account Full Legal Title	217-316	100	A/N	Conditionally Required This field may contain the full account title from the MSFI account matched for the SSN. The MSFI may provide this information for trust accounts or accounts with other legal titles (i.e., Law Office of…) to assist in the processing of the lien/levy request. Spaces will appear in this field if a full account title is not provided by the MSFI.
MSFI Matched Account Foreign Country Indicator	317	1	A/N	Required This field must contain one of the following values to indicate if the payee address provided is a US or foreign address: 1- The address of the payee is in a foreign country Space – The address of the payee is in the US
MSFI Matched Account Name	318-357	40	A/N	Required This field must contain the name on the account for the SSN from the MSFI data match. The name will be returned in the format stored by the MSFI (e.g., last name, first name or first name, middle initial and last name).

FCR INITIATE AEI REQUEST PART 2 RECORD				
Field Name	Location	Length	A/N	Comments
MSFI 2nd Payee Account Name	358-397	40	A/N	Conditionally Required This field must contain, if available, the name of the secondary payee on the matched MSFI account. If the MSFI Matched SSN is for the secondary payee on the account, this field must contain the name of the primary account owner. The name will be returned in the format stored by the MSFI (e.g., last name, first name or first name, middle initial and last name).
MSFI Matched Account Payee Street Address	398-437	40	A/N	Conditionally Required This field must contain, if available, the street address of the matched MSFI account. Spaces will appear in this field if a street address was not provided.
MSFI Matched Account Payee City	438-466	29	A/N	Conditionally Required This field must contain, if available, the city of the address for the matched MSFI account. Spaces will appear in this field if a city was not provided.
MSFI Matched Account Payee State	467-468	2	A/N	Conditionally Required This field must contain, if available, the alphabetic State code of the payee's address for the matched MSFI account. Spaces will appear in this field if a State code was not provided.
MSFI Matched Account Payee Zip Code	469-477	9	A/N	Conditionally Required This field must contain, if available, the Zip Code of the address for the matched MSFI account. If the four digit extension of the Zip Code was not provided, spaces will be in the last four positions of the field. Spaces will appear in this field if a city was not provided.
MSFI Matched Account Location State Code	478-479	2	A	Required This field must contain the alphabetic State code where the matched account is located.

FCR INITIATE AEI REQUEST PART 2 RECORD				
Field Name	Location	Length	A/N	Comments
MSFI Account Balance	480-486	7	N signed	Required This field must contain the account balance or value of the account in whole dollars if provided by the MSFI. To accommodate a negative balance, the amount is returned as a signed numeric field. Brokerage firms reporting margin accounts may report the balance as either the value of the account holder's equity position or the value of the account less any borrowed amount. Zeros will appear in the field for closed accounts or if the balance was not provided by the MSFI. A '0' will appear in the MSFI Account Balance Indicator if the balance was not provided by the MSFI.
MSFI Name Match Flag	487	1	N	Required This field will indicate the result of the MSFI match of the person's name sent to the agency on the inquiry file to the matched account's payee name. The valid values are: 0 – The MSFI was unable or elected not to match the last name. 1 – The first four letters of the matched account's payee last name matched the first four positions of the last name on the inquiry file. 2 – The first four letters of the matched account's payee last name did not match the first four positions of the last name on the inquiry file. Note: The primary match performed by the MSFI is on the SSN submitted in the inquiry file. MSFI's are instructed to match on SSN and return matches regardless of the name match. MSFI's are, however, encouraged to do an additional comparison of the matched account payee last name to the last name on the inquiry file to prevent the MSFI from receiving incorrect levies.

FCR INITIATE AEI REQUEST PART 2 RECORD				
Field Name	Location	Length	A/N	Comments
MSFI Trust Fund Indicator	488	1	N	Required This field must contain a code to indicate whether the matched account is a registered trust or escrow account. The valid values are: 0 – Not a registered trust/escrow account or the account is closed 1 – UTMA/UGMA Account 2 – IOLTA Account 3 – Mortgage Escrow Account 4 – Security Deposits (including Real Estate) 5 – Other Trust/Escrow 6 – Information Not Available
MSFI Account Balance Indicator	489	1	N	Required This field must contain one of the following values to indicate the status of the account balance provided by the MSFI: 0 – The Account Balance was not provided. 1 – The average account balance was provided (whether daily, monthly, etc.). 2 – The account balance as of the day the MSFI response was created.
MSFI Matched Account Payee Date of Birth	490-497	8	A/N	Optional This field may contain the date of birth of the matched account owner from the MSFI data match. The date is in CCYYMMDD format. Zeros will appear in this field if the date of birth was not provided by the MSFI.

FCR INITIATE AEI REQUEST PART 2 RECORD				
Field Name	Location	Length	A/N	Comments
MSFI Account Type	498-499	2	A/N	Required This field must contain a code to indicate the type of payee account matched by the MSFI. The valid values are: 00 – Not Applicable 01 – Savings Account 04 – Checking Demand Deposit Account 05 – Term Deposit Certificate 11 – Money Market Account 12 – IRA/Keogh Account 14 – ERISA Plan Account 16 – Cash Balances 17 – Compound Account includes investment accounts where portions of the balance are in differing funds – stocks, money markets, bonds, etc. 18 – Other
MSFI Payee Indicator	500	1	A/N	Required This field must contain a code to indicate the payee's status on the matched account. The valid values are: 0 – The SSN matched the account owner who is the sole owner of the account. 1 – The SSN matched the secondary account owner. 2 – The SSN matched the primary account owner and there are secondary owners on the account.
MSFI Matched Account Primary SSN	501-509	9	A/N	Conditionally Required This field must contain the primary account owner's SSN if the SSN submitted on the inquiry file matches to a secondary account owner. A '1' will appear in the MSFI Payee Indicator when this number is provided. If the MSFI Payee Indicator equals '0' or '2' this field must contain spaces.

FCR INITIATE AEI REQUEST PART 2 RECORD				
Field Name	Location	Length	A/N	Comments
MSFI Matched Account 2nd Payee SSN	510-518	9	A/N	Conditionally Required This field must contain a secondary account owner's SSN. This SSN will equal the MSFI Matched Account SSN if the SSN submitted on the inquiry file matches to a secondary account. A '1' or '2' will appear in the MSFI Payee Indicator when this number is provided. If the MSFI Payee Indicator equals '0', field must contain spaces.
AEI Request Date	519-526	8	N	Required This field must contain the date the AEI request was created by the Requesting State in CCYYMMDD format.
Filler	527-640	114	A/N	This field will be used for future versions. For the current version, it will be all spaces.

FCR STATE AEI RECEIPT ACKNOWLEDGEMENT RECORD				
Field Name	Location	Length	A/N	Comments
Record Type	1-2	2	A	Required This field must contain the code 'MR'.
Requesting State	3-4	2	N	Required This field must contain the numeric FIPS Code for the State initiating the AEI request.
Assisting State	5-6	2	N	Required This field must contain the numeric FIPS Code for the State acknowledging the AEI request.
Obligor's SSN	7-15	9	N	Required
Obligor's Member ID	16-30	15	A/N	Conditionally Required This field must be present if provided by the Requesting State.
Obligor's First Name	31-46	16	A	Required This field should be returned to the Requesting State as it was sent.
Obligor's Middle Name	47-62	16	A	Conditionally Required This field should be returned to the Requesting State if it was sent.
Obligor's Last Name	63-92	30	A	Required This field should be returned to the Requesting State as it was sent.
Requesting State Case ID	93-107	15	A/N	Required This field must be present if provided by the Requesting State in order to match response data from the Assisting State.
Requesting State User Field	108-122	15	A/N	Conditionally Required This field must be returned if sent by the Requesting State for identifying information.
Requesting State FIPS County Code	123-125	3	A/N	Conditionally Required This field must be returned if sent by the Requesting State for identifying information.

FCR STATE AEI RECEIPT ACKNOWLEDGEMENT RECORD				
Field Name	Location	Length	A/N	Comments
MSFI TIN	126-134	9	N	Required This field must contain the valid nine-digit Taxpayer Identification Number assigned to the FI holding the account and provided by the Requesting State.
MSFI Payee's Account Number	135-154	20	A/N	Required This field must contain the Account number of the payee provided by the requesting State.
Assisting State Response Code	155	1	A	Required This field must contain one of the following codes: A – Accepted for processing I – Rejected – complete information not provided R – Rejected – State unable to comply with request
Filler	156-640	485	A	This field will be used for future versions. For the current version, it will be all spaces.

FCR STATE AEI PASSBACK RECORD				
Field Name	Location	Length	A/N	Comments
Record Type	1-2	2	A	Required This field must contain 'MP'.
Requesting State	3-4	2	N	Required This field must contain the numeric FIPS Code for the State initiating the AEI request.
Assisting State	4-6	2	N	Required This field must contain the numeric FIPS Code for the State acknowledging the AEI request.
Obligor's SSN	7-15	9	N	Required
Obligor's Member ID	16-30	15	A/N	Conditionally Required This field must be present if the UIFSA code equals 'Y' or if the information was provided by the Requesting State.
Obligor's First Name	31-46	16	A	Required This field should be returned to the Requesting State as it was sent.
Obligor's Middle Name	47-62	16	A	Conditionally Required This field should be returned to the Requesting State as it was sent.
Obligor's Last Name	63-92	30	A	Required This field should be returned to the Requesting State as it was sent.
Requesting State Case ID	93-107	15	A/N	Conditionally Required This field should be entered if it was provided by the Requesting State Case ID in order to match response data from the Assisting State.
Requesting State User Field	108-122	15	A/N	Conditionally Required This field must be returned if sent by the Requesting State for identifying information.
Requesting State FIPS County Code	123-125	3	A/N	Conditionally Required This field must be returned if sent by the Requesting State for identifying information.

FCR STATE AEI PASSBACK RECORD				
Field Name	Location	Length	A/N	Comments
MSFI TIN	126-134	9	N	Required This field must contain the valid nine-digit Taxpayer Identification Number assigned to the FI holding the account.
MSFI Payee's Account Number	135-154	20	A/N	Required This field must contain the Account Number of the payee provided by the Requesting State.
Match Made Indicator	155	1	A	Required This field must contain the following values: Y – yes, a match was made N – a match was not made
Levy Issued Indicator	156	1	A	Required This field must contain one of the following values: Y – levy issued N – levy was not issued
Seizure Indicator	157	1	A	Required This field must contain one of the following values: Y – seizure N – no seizure
Amount Seized	158-169	12	N	Required This field must contain the amount seized or zeros if nothing was seized.
Date Collection Sent	170-177	8	A/N	Conditionally Required This field must contain the date the collection was sent to the requesting State in CCYYMMDD format. If a collection was not made, spaces will appear in this field.

FCR STATE AEI PASSBACK RECORD				
Field Name	Location	Length	A/N	Comments
Method of Payment Sent	178	1	A	Required This field must contain one of the following values: M – payment sent via registered mail E – EFT payment sent R – payment sent US mail N – payment was not sent
Filler	179-640	462	A	This field will be used for future versions. For the current version, it will be all spaces.