

May 1990

# INTERSTATE CHILD SUPPORT

## Better Information Needed on Absent Parents for Case Pursuit



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United States  
General Accounting Office  
Washington, D.C. 20548

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Human Resources Division

B-239408

May 24, 1990

The Honorable Thomas J. Downey  
Acting Chairman, Subcommittee on  
Human Resources  
Committee on Ways and Means  
House of Representatives

The Honorable Hank Brown  
Subcommittee on Human Resources  
Committee on Ways and Means  
House of Representatives

This report responds to your request for information on the extent of problems associated with insufficient absent parent information for interstate child support enforcement, and ways to improve the gathering and use of such information. The report explores the processes child support agencies use to obtain and verify information critical for pursuing interstate cases. On January 27, 1989, we sent you our report Interstate Child Support: Case Data Limitations, Enforcement Problems, Views on Improvements Needed (GAO/HRD-89-25).

As arranged with your offices, unless you publicly announce its contents earlier, we plan no further distribution of this report until 30 days from the date of this letter. At that time, we will send copies to other interested congressional committees, the Secretary of Health and Human Services, and the Director of the Office of Child Support Enforcement. We will also make copies available to others on request.

This work was done under the direction of Franklin Frazier, who can be reached on (202) 275-1793. Other major contributors to this report are listed in appendix VI.

Lawrence H. Thompson  
Assistant Comptroller General

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# Executive Summary

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## Purpose

Missing and inaccurate address and employment information on out-of-state absent parents frustrates child support agencies' efforts to pursue interstate cases. Without good information, interstate collection efforts languish and welfare benefits are paid to families who otherwise might not be entitled to them. The Subcommittee on Human Resources, House Committee on Ways and Means, asked GAO to identify ways to improve the manner of obtaining and using such information.

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## Background

The Congress created the Child Support Enforcement Program to strengthen state and local efforts to locate parents, establish paternity, obtain support orders, and collect support. The Office of Child Support Enforcement (OCSE) administers the program at the federal level and operates the Federal Parent Locator Service, which provides child support agencies with absent parent information held by such federal agencies as the Internal Revenue Service. State child support agencies administer the program at state and local levels and operate (1) state parent locator services, which obtain information on absent parents residing in their state from such sources as state motor-vehicle records; and (2) central registries, which receive, distribute, and respond to inquiries on cases referred by other states for enforcement action.

OCSE has estimated that up to 30 percent of all child support cases involve a custodial parent and child living in a different state than the absent parent. The child support agency in the state where the child lives (initiating agency) needs information on the absent parent to know where and how to pursue cases. Regulations require agencies to use all appropriate state and local sources of absent parent information within 60 days; effective October 1990, agencies will have 75 days to access all appropriate sources, including the federal locator service. The initiating agency often refers cases to the state where the absent parent lives or works (responding state) and relies on that state to establish or enforce support orders. In such cases, initiating agencies must provide "sufficient, accurate" information upon which to act. (See pp. 8-12.)

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## Results in Brief

Initiating agencies often lack complete and accurate address and employment information about absent parents that is needed to pursue interstate cases effectively. As a result, they do not pursue some interstate cases and use lengthy, cumbersome procedures to refer other cases for enforcement to the state where the absent parent lives. Further, when initiating agencies refer cases with missing and inaccurate information to other states, such states (1) may waste resources trying to

locate absent parents who may not live there, (2) may encounter delays, and (3) are unlikely to collect support.

Initiating agencies often do not use responding state parent locator services to obtain needed absent parent information because the services respond slowly. Also, some initiating agencies cannot access other data sources (e.g., national motor-vehicle records) that have useful address and employment data. Moreover, initiating agencies sometimes do not verify critical information obtained from custodial parents or other sources before referring cases to other states for action and send some cases to the wrong state. Interstate case enforcement should improve and responding states should save resources if initiating agencies obtain and verify critical information before referring cases to other states.

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## Principal Findings

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### Missing Information Hinders Case Pursuit by Initiating Agencies

Initiating agencies often do not pursue interstate cases because information about the absent parent is missing. Demonstration projects in Maryland and Connecticut showed that initiating agencies did not pursue one-fifth of the interstate cases in Maryland and one-third in Connecticut because addresses were missing. Also, each initiating caseworker GAO surveyed had not pursued some interstate cases because the absent parent's address and employment data were missing.

When address and employment data are missing, initiating agencies' options for pursuing interstate cases are limited. Initiating agencies often use lengthy, cumbersome legal procedures to refer some cases for enforcement to the state where the custodial parent or other sources indicate the absent parent lives. That state assumes responsibility for the case and uses its own legal procedures to establish and enforce a new support order. A Michigan demonstration project showed that initiating agencies can reduce case processing time and increase collections by using enforcement options that avoid or minimize involving other states. With better out-of-state absent parent information, initiating caseworkers GAO surveyed would make greater use of such options as requesting employers who also do business in their states to withhold out-of-state absent parents' wages. (See p. 13.)

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**Missing and Inaccurate Information Hinders Enforcement by Responding States**

Initiating agencies often provide absent parent information with cases referred to other states that is not sufficient and accurate. Caseworkers in 10 states told GAO that up to 67 percent of the cases they received lacked the absent parent's correct address and up to 78 percent lacked correct employment information. GAO's review of 50 interstate cases received by Alameda County, California, also showed that such cases often had missing and inaccurate information.

Some cases are sent to the wrong place for action. For example, 10 percent of the cases referred by other states to one state's central registry involved parents who did not live in that state. In such instances, responding states waste time and effort trying to locate absent parents who live elsewhere. Further, caseworkers GAO surveyed experienced delays averaging 6 months when processing cases referred by other states with missing or inaccurate information. Also, GAO's Alameda County case review showed delays of about 4 months in cases referred by other states with inadequate information. Moreover, Connecticut's demonstration project and GAO's case review show the prospects for collections decrease when initiating agencies forward cases with missing or inaccurate information. (See pp. 14-16.)

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**Opportunities to Improve Information Through Better Use of Available Sources**

Initiating caseworkers GAO surveyed often do not use responding state parent locator services to obtain absent parent information because the services respond too slowly. Most state parent locator services can access both motor-vehicle and employment records within 1 day. But one-half take 1 month or longer to respond to requests from other states, some of which take longer than the 60 days that initiating agencies now have to obtain absent parent information; estimates range up to 140 days. OCSE recognizes the need for quick responses, but has not established time frames for responding to other states' information requests on cases that have not been referred for enforcement action.

OCSE guidance is unclear on the use of states' central registries for information requests. Some state officials told GAO that OCSE requires them to process information requests from other states through their central registries, which adds to response time. In November 1989, OCSE officials told GAO that initiating agencies may send information requests directly to other states' parent locator services. Although OCSE had not issued specific guidance on the matter at the time of GAO's work, it indicated plans to do so in its comments on this report.

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Initiating agencies also make varied use of such information sources as nationwide motor-vehicle and employment records, the Federal Parent Locator Service, and commercial sources. Through OCSE and other federal initiatives, information about out-of-state absent parents may be more accessible in the future. (See p. 16-20.)

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### Verification Needed to Ensure Accurate Information

Federal regulations allow initiating agencies discretion in determining how to check the accuracy of absent parent information before referring cases to other states. While some agencies routinely verify absent parent addresses with the post office before referring cases, some do not. Child support officials GAO surveyed said that initiating agencies should verify such information before referring cases, and that doing so should help improve interstate case enforcement. (See p. 20.)

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### Recommendations

GAO recommends that the Secretary of Health and Human Services (HHS) direct OCSE to:

- Require that initiating child support agencies exhaust all reasonable efforts, including, as appropriate, checking other states' parent locator services, to obtain address and employment information on out-of-state absent parents for use in deciding how best to pursue interstate cases.
- Require initiating agencies to verify out-of-state parents' addresses with the post office before sending cases with questionable information to other states for action.
- Require, by modifying existing performance standards, that responding state parent locator services quickly (preferably within 1 week) provide information from motor-vehicle, employment, and other readily accessible sources when responding to other states' information requests on cases that have not been referred for action.
- Clarify that initiating child support agencies may request absent parent information directly from other states' parent locator services without sending such requests through the responding states' central registries.

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### Agency Comments

HHS agreed with GAO's recommendation to make clear that initiating agencies can make direct information requests of other states' parent locator services. HHS believes, however, that existing standards and new rules effective October 1990, should satisfy GAO's other recommendations. GAO believes that additional actions are needed to bring about the improvements sought by those recommendations. HHS's technical comments were incorporated in this report as appropriate.

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**Abbreviations**

GAO	General Accounting Office
HHS	Department of Health and Human Services
OCSE	Office of Child Support Enforcement
SPLS	state parent locator service

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# Introduction

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Inadequate information on out-of-state absent parents often hinders state and local agencies' efforts to provide child support enforcement services, including establishing paternity, obtaining support orders, and collecting support payments. Lack of information on the absent parent's whereabouts and employment can result in failure to pursue cases, processing delays, and reduced collections.

Child support agencies often have more difficulty obtaining information on out-of-state absent parents than on absent parents living in the state because caseworkers generally lack direct access to out-of-state information sources. The Office of Child Support Enforcement (OCSE), which administers the federal Child Support Enforcement Program, has estimated that interstate cases represent up to 30 percent of all child support enforcement cases. This report explores the processes child support agencies use to obtain and verify information critical for pursuing interstate cases.

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## How Agencies Pursue Interstate Cases

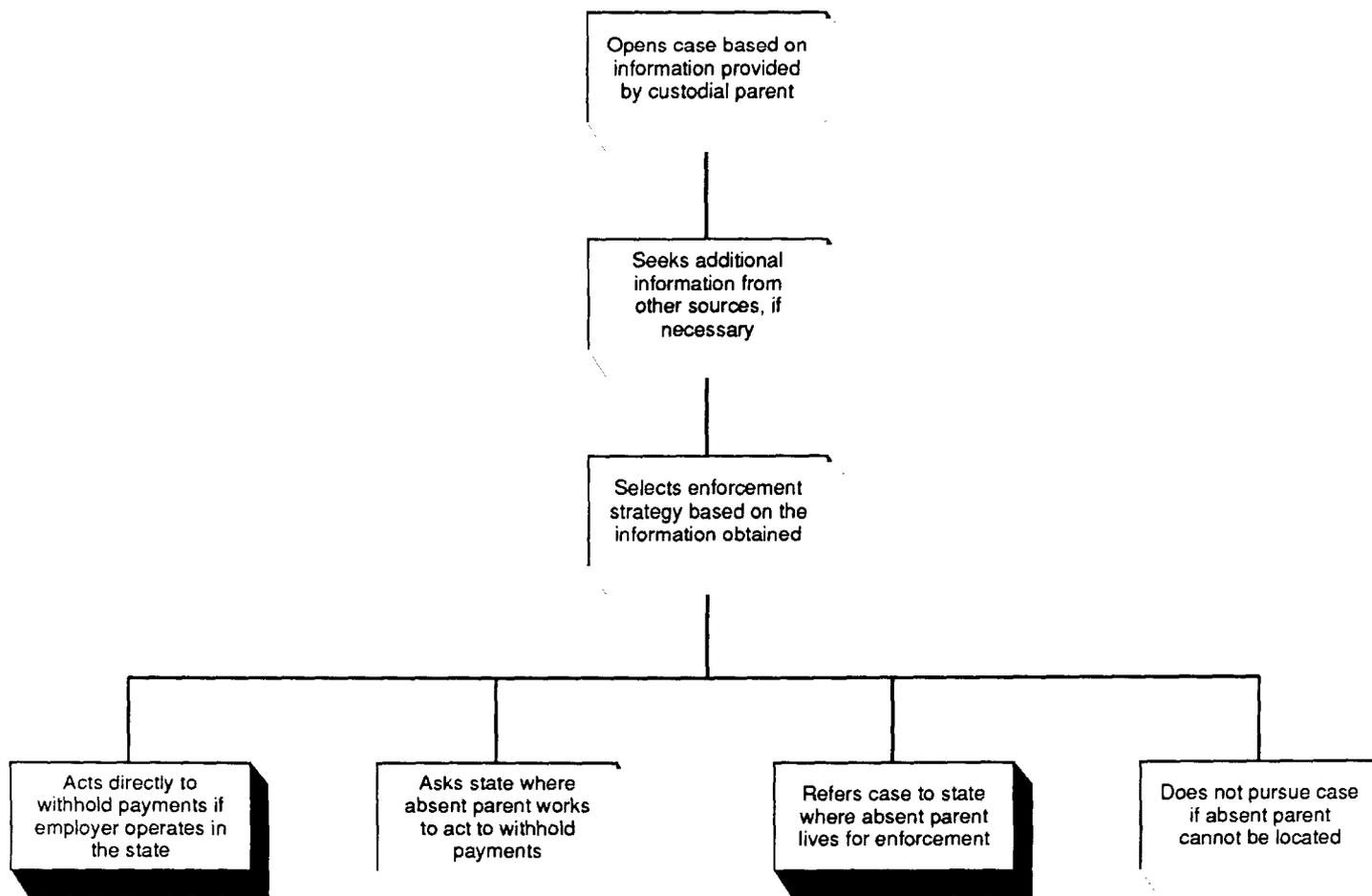
The child support agency in the state where the child and custodial parent live (initiating agency) needs information on the out-of-state absent parent in order to decide where and how to pursue interstate cases.<sup>1</sup> The initiating agency opens an interstate case based on information provided by the custodial parent when the parent applies for Aid to Families with Dependent Children or seeks child support enforcement services, as shown in figure 1.1.<sup>2</sup> If necessary, the initiating agency seeks missing information on the out-of-state absent parent from other sources. Without sufficient information concerning the absent parent, the initiating agency may not be able to pursue the case. If sufficient information is obtained, the initiating agency may pursue the case using various enforcement options depending on case circumstances. (See p. 10.)

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<sup>1</sup>To simplify presentation, we use custodial parent when referring to the person with physical custody of the child. The person could be a relative or an unrelated person.

<sup>2</sup>The Aid to Families with Dependent Children program, authorized by title IV of the Social Security Act, provides cash and other assistance to children in families that meet prescribed income, resource, and other eligibility requirements. As a condition of eligibility, the custodial parent must assign child support rights to the state and, with few exceptions, must cooperate in providing information concerning the absent parent.

Figure 1.1: How Initiating Agencies Pursue Interstate Child Support Cases With Existing Support Orders



## Obtaining Critical Absent Parent Information

Certain information about absent parents is critical to effective interstate child support enforcement:

- An accurate address. This is needed to determine where to pursue cases and to notify the absent parent before taking enforcement actions.
- Income and employment information. This is important for determining the absent parent's ability to pay support and identifying the most effective enforcement option.

In addition, the social security number and date of birth are useful for confirming the absent parent's identity and accessing certain databases containing address and employment information.

When the custodial parent does not provide sufficient information about an out-of-state absent parent, the initiating agency may seek information from other sources. For example, the agency may request information from the state parent locator service (SPLS) in the state where the absent parent is believed to live or work (responding state). Each state operates an SPLS, as required by federal law, to help locate information on absent parents by using such state and local records as motor vehicle, employment, and public assistance. (See app. I for sources routinely accessed by SPLSS.)

Initiating child support agencies may also seek information from the Federal Parent Locator Service, operated by OCSE. This service accesses federal records maintained by the Internal Revenue Service, Social Security Administration, Department of Defense, Selective Service System, National Personnel Records Center, and Department of Veterans Affairs. Access to these records and other nationwide data is particularly helpful when the initiating agency does not know in which state the absent parent lives or works.

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## Initiating Agencies' Enforcement Options

An initiating child support agency may have a number of alternative interstate enforcement options depending on the circumstances of the case. Regardless of the circumstances, the agency may refer the case to the state where the absent parent lives for appropriate action, including establishing paternity and support orders, if needed, and enforcement. Under some circumstances the initiating agency can use long-arm statutes to establish paternity and support orders.<sup>3</sup> If an out-of-state absent parent with a support order works for the military, federal government, or an employer doing business in both the initiating and responding states, the initiating agency can request the employer to withhold wages without involving the other state (direct withholding). Alternatively, the initiating agency can request the child support agency in the state where the absent parent works to have the employer there withhold child support payments (interstate income withholding). (See app. II for details on enforcement options.)

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<sup>3</sup>Long-arm statutes are state laws that give the state where the child and custodial parent live authority to take action against an out-of-state absent parent under some circumstances, such as when the child was conceived in the initiating state.

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## Program Administration

The Congress created the federal Child Support Enforcement Program to strengthen state and local efforts to locate absent parents, establish paternity, obtain support orders, and collect support payments. State child support agencies are responsible for administering the program at the state and local levels.<sup>4</sup> At the federal level, OCSE, in the Department of Health and Human Services (HHS), is responsible for the program and funds 66 percent of states' administrative costs.

OCSE regulations provide that responding states must cooperate in locating absent parents and enforcing child support. Further, OCSE issued regulations in February 1988 to improve the processing of cases referred from one state to another for enforcement. The regulations require that, when referring (using an interstate transmittal form) cases for action, the initiating state provide the responding state with "sufficient, accurate" information upon which to act. To ensure accountability for interstate cases, the regulations require that each state operate a central registry as a focal point to receive, distribute, and respond to inquiries on all interstate cases referred from other states. Within 10 days, central registries must forward cases to the responding SPLS or other appropriate agency for processing.

In August 1989, OCSE issued regulations, effective October 1990, setting forth performance standards, as required by the Family Support Act of 1988, to improve the timeliness and effectiveness of child support case processing. These standards provide that, within 75 days of determining that locator services are needed, states access all appropriate information sources, including the Federal Parent Locator Service, to obtain information to pursue child support cases and ensure the information is sufficient to take the next appropriate action. Currently, states are required to use all appropriate state and local sources within 60 days of receiving a case. OCSE lengthened the time to allow for accessing the federal locator service, to ensure the sufficiency of information, and to allow time for states that lack automated access to the sources.

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## Objectives, Scope, and Methodology

On July 19, 1988, the Acting Chairman and then Ranking Minority Member, Subcommittee on Human Resources, House Committee on Ways and Means, asked us to review the extent of problems associated with insufficient information for interstate child support enforcement and identify

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<sup>4</sup>Throughout this report, the word "state" refers to the 50 states, the District of Columbia, Puerto Rico, Guam, and the Virgin Islands.

ways to improve the gathering and use of such information. In a previous review, we reported that absent parent data were a barrier to successful child support enforcement.<sup>5</sup>

In doing our work we (1) examined relevant interstate demonstration projects and other child support studies; (2) discussed the issues with OCSE officials; and (3) interviewed officials and reviewed cases at the child support agency in Alameda County, California, and interviewed officials in the San Diego County, California, agency. We selected these agencies because they were in a state that has a large number of interstate cases.

To further corroborate our earlier work and the results of the demonstrations and other available studies, we sought the views of state and local child support enforcement practitioners. We conducted a telephone survey of SPLSs in the 50 states, the District of Columbia, Puerto Rico, Guam, and the Virgin Islands to obtain views on the extent and timeliness of their services. Also, we conducted a telephone survey of central registry officials and state and local child support agency caseworkers in 10 states to determine their practices and views on initiating and responding to interstate cases. Further, we attended OCSE-sponsored conferences and discussed relevant issues with national child support organization officials. Although we did not independently verify these practitioners' views, we found them internally consistent and reflective of the results of available studies. For more details on our audit scope and methodology, see appendix III.

Our work was conducted between December 1987 and March 1989 in accordance with generally accepted government auditing standards.

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<sup>5</sup>The results of this review were summarized in the report, *Interstate Child Support: Case Data Limitations, Enforcement Problems, Views on Improvements Needed* (GAO/HRD-89-25, Jan. 27, 1989).

# Better Absent Parent Information Needed for Pursuing Interstate Cases

Initiating child support agencies often do not obtain critical information on out-of-state absent parents that is needed to efficiently and effectively pursue interstate child support cases. As a result, initiating agencies do not pursue some interstate cases and refer some cases to other states for pursuit using lengthy, cumbersome procedures. Further, agencies refer some cases with missing and inaccurate information to other states for enforcement and send cases to the wrong state. When responding states receive such cases, they waste resources trying to locate individuals or their employers, encounter delays in case processing, and are unlikely to collect support payments. Initiating agencies often do not use responding SPLSS or other sources to obtain needed out-of-state absent parent information because such sources are slow in providing requested information. Also, some initiating agencies cannot access some sources that contain useful absent parent information. Further, they sometimes do not verify critical absent parent information obtained before referring cases to other states for enforcement.

## Missing Information Hinders Case Pursuit by Initiating Agencies

Initiating child support agencies often do not pursue cases involving out-of-state absent parents because addresses and other pertinent information are missing. A 1986 Maryland interstate demonstration project estimated that the state did not pursue 20 percent of the interstate cases originating in Maryland because an address was lacking.<sup>1</sup> Similarly, our analysis of data from a 1987 Connecticut demonstration project found the state did not pursue 37 percent of the interstate cases originating in Connecticut due to lack of addresses.<sup>2</sup> Also, a review by the Department of Health and Human Services' (HHS's) Inspector General of 649 cases where no support order had been established for 2 years disclosed that child support agencies did not pursue 57 percent of the cases because the absent parent could not be located. The study cited difficulty in obtaining addresses from other states as a contributing problem. Also, the initiating agency caseworkers we surveyed all said they had not pursued some cases due to lack of sufficient and accurate information.<sup>3</sup>

<sup>1</sup>Based on a sample of 226 cases drawn from interstate cases initiated in calendar years 1982 to 1985.

<sup>2</sup>Based on a sample of 294 cases drawn from interstate cases initiated in calendar years 1983 to 1986.

<sup>3</sup>OCSE's new regulations, effective October 1990, will require agencies to make repeated attempts to locate absent parents when previous attempts have failed. At a minimum, the agencies must check the Federal Parent Locator Service annually.

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Enforcement Options  
Limited When Information  
Is Missing

When initiating agencies lack address and employment data for out-of-state absent parents, they often use the lengthy, cumbersome civil procedures outlined in model legislation embodied in the Uniform Reciprocal Enforcement of Support Act to pursue the cases.<sup>4</sup> To use these procedures, initiating agencies must identify the state where the absent parent lives. Responsibility for the case is transferred to that state, which then uses its own legal processes to establish and enforce a new support order. Demonstration projects in Maryland, Connecticut, and Michigan and our review of 50 cases sent by other states to Alameda County, California, indicate that cases pursued using these procedures usually took about a year to process and that most do not result in collections.

When initiating agencies obtain address and employment data on out-of-state absent parents, they often can use more effective interstate enforcement options, such as direct and interstate income withholding. (See p. 10 and app. II.) The 1988 Michigan demonstration project indicated that these enforcement options eliminate or reduce the need to involve another state, thereby eliminating lengthy delays and increasing collections.

Initiating caseworkers we surveyed would use direct and interstate income withholding more frequently if out-of-state absent parent information was more readily available. The supervisor of the Interstate Unit in Allegheny County, Pennsylvania, told us that using direct withholding may result in payment in as little as 30 days. With better access to employment information, initiating caseworkers estimated they would be able to use either direct or interstate income withholding in 50 to 90 percent of their interstate cases having support orders.<sup>5</sup>

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<sup>4</sup>All states have enacted some form of this model legislation for enforcing interstate child support. (See app. II.)

<sup>5</sup>According to a 1987 Connecticut study and our Alameda case file review, about one-half of interstate cases have existing support orders. For certain cases without orders, initiating agencies can establish support orders without involving responding states. (See app. II for details on long-arm statutes.) The initiating agency must obtain an accurate address to notify the absent parent, as required by law, before taking any direct actions to establish or enforce support obligations.

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## Responding States Cannot Efficiently Pursue Interstate Cases When Critical Information Is Missing

Responding states often cannot efficiently or effectively pursue interstate cases because complete and accurate address and employment information about the absent parent is lacking. Caseworkers we surveyed estimated that 25 to 67 percent of the cases referred to them by other states lacked a correct address, 40 to 78 percent lacked accurate employment information, and 50 to 96 percent lacked wage or income information. Further, of the 50 Alameda County cases we reviewed, 27 lacked correct addresses and 29 lacked correct employer information.

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## Resources Wasted

When the initiating agency lacks accurate out-of-state absent parent information, it sometimes sends cases to the wrong state or jurisdiction for enforcement. The responding state then wastes time and effort establishing case records and trying to locate absent parents who do not live or work there. Idaho central registry officials told us that in 10 percent of the cases referred from other states, the absent parents did not live in Idaho, and that many of the absent parents were subsequently found to be residing in the state that initiated the request.

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## Case Processing Delayed

Case processing is delayed when agencies refer cases to other states with missing and inaccurate information. If unable to locate the absent parent, responding caseworkers contact the initiating child support agency to request additional information. Responding caseworkers estimated that processing time for interstate cases is extended an average of 6 months while they try to locate absent parents for whom the initiating agency does not provide accurate address and employment information. Similarly, our Alameda County case review indicated that establishment of support orders is delayed about 4 months when cases are received with missing or inaccurate information.

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## Likelihood of Collections Reduced

Lack of absent parent information is a major factor contributing to the lack of collections in most cases sent to responding states for enforcement. The 1987 Connecticut study concluded that when the initiating agency did not provide an accurate address, employment information, social security number, or date of birth, the responding state was unlikely to find the absent parent and collect support. In Wayne County, Michigan, a study of 1,000 cases received from other states showed that inability to locate the absent parent was the major reason a support order was not established and collections not obtained for 641 cases.

**Chapter 2**  
**Better Absent Parent Information Needed for**  
**Pursuing Interstate Cases**

Our Alameda County case file review also indicated that cases were less likely to result in collections when initiating agencies did not provide accurate information, as shown in table 2.1.

**Table 2.1: Success of Collections in Alameda County When Certain Types of Information Were Provided<sup>a</sup>**

<b>Information provided by initiating agency</b>	<b>Number of cases</b>	<b>Number with collections</b>
Correct address and employer	9	9
Neither address nor employer	21	3
Correct employer only	5	3
Correct address only	5	2
Unable to determine what information was provided	3	2
Initiating jurisdiction requested dismissal <sup>b</sup>	7	0
<b>Total</b>	<b>50</b>	<b>19</b>

<sup>a</sup>Based on 50 interstate cases received between January and March 1987. Collection status as of April 1988.

<sup>b</sup>Cases withdrawn due to such circumstances as the absent parent assuming custody of the child.

As table 2.1 shows, the Alameda County child support agency collected payments in less than one-half the cases. When the initiating agency provided neither accurate address nor employment information, the county collected nothing in 18 of 21 cases. In 2 of the 18 cases the parent lacked the ability to pay; in 15 cases the parent was not found in Alameda County; and in 1 case collection action was still pending. When the initiating agency provided both accurate address and employment information, Alameda County collected child support in all 9 cases.

**Opportunities to Improve Information Through Better Use of Available Sources**

**Limited Use of Responding States' SPLSS**

Initiating child support agencies often do not use responding states' SPLSS to obtain absent parent information, although these services generally have access to address, employer, and wage data for individuals who live or work in the state. Of the 10 initiating caseworkers we surveyed, 2 never used this information source; 1, rarely; and 2, sometimes. Four were discouraged from using this source because the SPLSS

responded so slowly to their requests. Moreover, all could more successfully process interstate cases if they could quickly obtain address, employer, and wage data for out-of-state absent parents.

Available data indicate SPLSS sometimes take months to respond to interstate requests. SPLS officials estimated that their average response time for such requests ranged between 1 and 90 days; 27 of the 54 SPLSS estimated an average response time of 30 days or longer. (See app. IV for SPLSS' response-time estimates.) Initiating caseworkers we surveyed estimated that responding SPLSS took 21 to 140 days to reply to their requests. California officials reviewed 384 information requests they had made to 47 other states in 1987, and found that average response times ranged from 20 to 353 days, with 20 SPLSS averaging more than 60 days to reply.<sup>6</sup>

Quicker Response Possible

SPLS officials we surveyed, if required, could provide information quickly from readily accessible databases, although some have backlogs and may need additional resources. Most SPLSS do not quickly respond to requests from other states. However, 34 SPLS officials we contacted can access their state's employment and motor-vehicle records within 1 day, as shown in table 2.2.

Table 2.2: SPLS Access Time for Motor-Vehicle and Employment Databases

Access time	States accessing		
	Motor-vehicle data	Employment data	Both
Immediate or same day	45	37	34
1 to 2 days	3	7	6
3 to 7 days	2	4	5
Greater than 7 days	4	4	7
No access	0	2	2
<b>Total</b>	<b>54</b>	<b>54</b>	<b>54</b>

OCSE recognizes the need for quicker responses to requests for information by responding state parent locator services when cases are not referred for enforcement action. In comments accompanying the August 1989 regulations establishing performance standards for case processing, OCSE said that responding states should respond more quickly to such interstate information requests by providing data from automated sources. However, OCSE has not established time frames for responding to such requests.

<sup>6</sup>Interstate Location Study, California Parent Locator Service, August 1988.

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Central Registries Delay  
Response Time

Some child support officials told us that interstate information requests were slowed by the OCSE requirement that such requests be processed through the responding state's central registry. The Indiana SPLS director told us that routing requests through states' central registries added at least 10 days to the overall response time. California SPLS officials said that their system would allow information requests from other states to be phoned in and entered immediately on a computer screen for action, but that the requirement to submit requests through the state's central registry prevented using the phone-in system. Moreover, central registries often do little more than act as conduits to SPLSS for information requests.

State officials attending locate conferences in October 1988 and May 1989 asked OCSE to eliminate the requirement that information requests be processed through the central registry. In November 1989, OCSE officials told us that initiating agencies may make information requests to responding SPLSS without going through the central registry. OCSE had not issued specific guidance to states setting forth this position at the time of our review, but it indicated that it plans to do so in its formal comments to this report.

OCSE Initiatives to Improve  
Interstate Access to Information

OCSE has taken steps to improve initiating agencies' access to absent parent address and employment information in interstate cases. OCSE funded demonstration projects to establish regional locate networks in 2 of HHS's 10 regions. Agency officials in those regions told us that the networks are useful in obtaining data from participating states. Also, OCSE is planning to establish a nationwide automated child support network by 1992, which OCSE officials told us should facilitate quick responses by SPLSS to interstate information requests. The network plans were still being developed at the time of our review.

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Use of Other Information  
Sources

Child support officials make varying use of national and regional information sources for obtaining data on out-of-state absent parents. Such sources are particularly helpful when the initiating caseworker does not know which state to contact for information.

Nationwide Motor-Vehicle Data

SPLS officials told us that child support agencies in 11 of the 54 states have access to nationwide motor-vehicle records. The agencies access these data through the National Law Enforcement Telecommunications System—an automated communication network that provides on-line nationwide access to motor-vehicle records. Officials in most of the 11 states routinely use this network before initiating interstate cases to

obtain or help confirm absent parent addresses, and such queries provide absent parent addresses 40 to 80 percent of the time.

The network was established and is operated by state law enforcement agencies to provide information for criminal justice purposes. Some state child support agencies have been denied access to the network because network operators do not view them as law enforcement agencies or do not believe they would use the information for criminal justice purposes.

By 1991, access to nationwide motor-vehicle data may become available through a communications network being developed by the American Association of Motor Vehicle Administrators with funds provided by the Department of Transportation. This planned network will be used to meet the needs of state motor vehicle administrators and other government agencies for motor vehicle business. OCSE has encouraged child support agencies to arrange access to this network.

#### Federal Parent Locator Service

Of the initiating caseworkers we surveyed in 10 states: 1 always uses the Federal Parent Locator Service; 5 often use it; 2, sometimes; and 2, rarely. Some did not use the service more frequently because data from federal records obtained through the service are sometimes out of date, obtaining the data can be time consuming, or more accurate data can be obtained from other sources. However, six believed the data are often useful for interstate case pursuit. OCSE has taken steps to improve the response time and accessibility to the service, and child support agencies are making increased use of this source.

#### Nationwide Employment Data

OCSE is negotiating with the Department of Labor and state employment services to allow all child support agencies to have access to nationwide employment records, as called for in the Family Support Act of 1988. The agencies will access this information through Federal Parent Locator Service quarterly cross-matches with state employment records. One state child support agency reported participating in such a match. That agency submitted a tape of 1,173 absent parents for which address and employment information were lacking, and reported receiving information on 41 percent of the parents.

#### Commercial Sources

Some states have found that such commercial sources as credit bureaus and regional telephone databases are useful when initiating interstate cases. Five of the 10 initiating caseworkers we surveyed use credit bureaus to obtain information on out-of-state absent parents and sometimes find such data useful to the case. One state official believed that a

regional telephone database is often useful for finding or completing an address or obtaining an out-of-state absent parent's phone number.

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## Verification Practices Vary

Initiating agencies obtain absent parent address and employment information from custodial parents or other sources that sometimes is inaccurate or out-of-date. However, their verification practices vary. While some initiating agencies routinely verify information before forwarding cases to other states for enforcement, others do not. Initiating caseworkers in 7 of the 10 states we surveyed reported always verifying out-of-state absent parent addresses with the post office, and caseworkers in 6 states reported always contacting employers to verify employment. Federal regulations do not set forth requirements for information verification, leaving to the child support agency's discretion what steps to take to ensure that information provided to responding states is sufficient and accurate enough to act on.

There was a general consensus among child support officials surveyed that initiating agencies should verify absent parent address and employment data before forwarding the cases for interstate enforcement. Initiating caseworkers in all 10 states surveyed believed that data verification by initiating agencies saves case processing time and increases the likelihood of collections by responding states. Officials in six central registries we surveyed believed that if initiating agencies obtained and verified absent parent information before forwarding cases, there would be a great improvement in interstate enforcement. Three other central registry officials believed doing so would be a moderate improvement because they thought initiating agencies now obtain and verify such information. Also, SPLS officials in 11 of 13 states with whom we discussed the issue said that initiating agencies should verify absent parent information.

Some child support officials told us that employment verification should be done by responding states. Oregon SPLS officials have asked that verification checks with employers in their state be handled through the Oregon SPLS so that large employers are not burdened with individual requests from all over the country. OCSE officials also expressed concern about child support agencies contacting out-of-state employers directly to verify employment on cases initiating agencies intend to refer to other states for enforcement. The OCSE officials told us that this might be burdensome on some employers, and that responding states are more familiar with local employers.

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## Conclusions and Recommendations

Initiating child support agencies often fail to obtain and verify critical information about out-of-state absent parents. As a result, initiating agencies do not pursue some cases and use inefficient procedures to pursue others. Also, agencies often refer cases to other states with missing and inaccurate information, resulting in wasted resources, case processing delays, and decreased collections by the responding states.

Initiating child support agencies often do not use all available sources to obtain missing information on out-of-state absent parents. Some do not use the SPLS in the state where the absent parent lives or works because the services respond too slowly. Most SPLSS have 1-week access to state records with address and employment data, but many do not respond quickly to requests for information from other states. Moreover, response time increases when child support agencies send information requests through responding states' central registries, which merely act as conduits for such requests. Interstate child support cases could be pursued more efficiently and effectively if initiating agencies could access needed information sources in other states more directly and receive requested information more quickly.

Responding states should save time and resources, and the chances for successful enforcement should increase, if initiating agencies obtained critical absent parent information before deciding where or how to pursue cases and verified absent parent addresses before referring cases to other states for action.

We recommend that the Secretary of Health and Human Services direct OCSE to:

- Require that initiating child support agencies exhaust all reasonable efforts, including, as appropriate, checking other states' parent locator services, to obtain address and employment information on out-of-state absent parents for use in deciding how best to pursue interstate cases.
- Require initiating agencies to verify out-of-state absent parents' addresses with the post office before sending cases with questionable information to other states for action.
- Require, by modifying existing performance standards, that responding state parent locator services quickly (preferably within 1 week) provide information from motor-vehicle, employment, and other readily accessible sources when responding to other states' information requests on cases that have not been referred for action.

- 
- Clarify that initiating child support agencies may request absent parent information directly from other states' parent locator services without sending the requests through the responding states' central registries.

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## Agency Comments

HHS shared our concern about the inadequacy of information for locating absent parents in interstate cases and agreed with our recommendation to make clear that initiating agencies can make direct information requests of other states' parent locator services. HHS said, however, that existing and new rules, effective October 1990, will substantially meet our recommendation that initiating agencies should be required to exhaust all reasonable efforts to obtain address and employment information on out-of-state absent parents for use in deciding how best to pursue interstate cases.

While we agree the new rules are a step in the right direction, we question whether they go far enough to address the problems we found with interstate cases. Neither the current nor new rules effective October 1990 make clear what actions are needed to effectively pursue cases involving parents living out of state. Such actions often are more time consuming, difficult to administer, and critical to effective enforcement than actions needed when parents live within a state. For example, the rules do not address direct wage withholding for interstate cases, which we believe to be among the most effective enforcement options for such cases and which initiating caseworkers we surveyed often identified as their preferred enforcement option. However, the technique often was not used because out-of-state absent parent address and employment information was lacking.

Also, while the rules identify many information sources for locating absent parents, they do not identify, for use in finding out-of-state parents, other states' parent locator services. These normally have address, employer, and other information on persons living or working in the state, and, thus, are critical references when initiating interstate cases. We also found that many case initiators were not routinely checking this source. Thus, notwithstanding the new rules, we continue to question whether initiating states will exhaust all reasonable efforts to obtain accurate address and employment information before deciding on the most appropriate enforcement action. We have revised our recommendation to specify that such reasonable efforts should include "as appropriate, checking other states' parent locator services."

Regarding our recommendation that agencies, before referring cases to other states for services, verify absent parents' addresses with the post office, HHS said that its new rules would accomplish the recommendation's purpose. HHS also said that post-office verification may be counterproductive and hinder location efforts when an initiating agency is reasonably certain of an address's validity.

While we agree that initiating agencies should act on cases when they are reasonably certain they have accurate information, we believe that HHS's rules should require post-office verification when there is doubt, such as when there are indications that the parent could be living or working in more than one state. Routine post-office verification is a relatively simple and quick way of verifying that information is accurate so that cases are referred to the correct state for action. We found that cases often are sent to the wrong state or referred with incomplete or inaccurate addresses, which results in long delays and wasted effort. States that routinely conduct post-office verifications said the process takes 2 to 3 weeks, while responding caseworkers estimated that case processing time is extended an average of 6 months when they must locate absent parents for whom initiating agencies fail to provide accurate addresses. In such cases, the short delay needed for case initiators to do post-office verification would be more than offset by the substantial amounts of processing time and effort that could be saved. Our recommendation was revised to require post-office verification for cases "with questionable information."

Regarding our recommendation that state locator services be required to quickly (preferably within 1 week) respond to other states' requests for absent parent information, HHS said that there already are time frames for this purpose. In addition, HHS commented that its new rules will require agencies to check all appropriate location sources. However, the time frames do not apply to responding agencies unless a case has been referred to them for action. Thus, the standards do not apply to requests for location information when cases have not been referred for action. Initiating agencies expeditiously need such information to decide the most effective enforcement option or where to refer the cases. We have clarified our recommendation to require performance standards to ensure state agencies quickly provide readily accessible information "when responding to other states' information requests on cases that have not been referred for action."

# Sources Routinely Accessed by SPLSs

Information sources	States with access
Motor vehicle (driver license, auto registration)	54
Employment (employer, wage, unemployment)	52 <sup>a</sup>
Public assistance (Food Stamps, Aid to Families With Dependent Children, Medicaid)	32
Corrections/criminal	16
Credit bureaus	13
State tax (for address only)	10
State tax (including financial data)	6
State personnel department	4
Miscellaneous	7

<sup>a</sup>Ohio and Rhode Island do not yet access employment data pending completion of planned automation projects. Of the 52 states that do access employment data, Puerto Rico reported collecting employer but not wage data.

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# Major Options Available to Initiating Agencies for Interstate Child Support Enforcement

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## Direct Income Withholding

This can be used to enforce an existing support order when the absent parent works for the military, the federal government, or an employer that does business in the initiating and responding states. The initiating child support agency can enforce income withholding through these employers without involving the state where the absent parent works.

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## Interstate Income Withholding

This can be used to enforce an existing support order when the absent parent is employed in the responding state. Federal law requires that, upon request of the initiating child support agency, the responding state must enforce income withholding without amending the existing order or further court action.

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## Long-Arm Statutes

These can be used by an initiating child support agency to establish paternity and support orders for out-of-state absent parents without involving the other state, under certain circumstances. For example, many states have long-arm statutes that allow support order establishment when couples were married, were divorced, or conceived the child in the initiating state. Enforcement of the order must be carried out through one of the other options.

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## Uniform Reciprocal Enforcement of Support Act (Civil Procedure)

The model legislation can be used to establish paternity and support orders, as well as to enforce orders. It is the most frequently used enforcement option. Upon request of the initiating child support agency, the responding state uses its own legal processes to establish and enforce a new order, even if one already exists. The responding state may use all available tools to enforce the order, including income withholding, liens, etc. All states have such procedures.

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## Uniform Reciprocal Enforcement of Support Act (Registration)

The model legislation can be used to enforce an existing support order. At the request of the initiating child support agency, the responding state legally certifies (registers) the order; no new order is established. The registered order is then treated the same as it would be if established by the responding state. Thirty-six states have such procedures.

# Scope and Methodology Details

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## Review of Relevant Interstate Studies

Based on a literature search and a survey of interstate demonstration projects, we identified and examined the following studies:

- Interstate Child Support Collections Study, by Dennis Cooper, funded by HHS and published in 1985, surveyed local and state child support officials.
- The Maryland (1986), Connecticut (1987), and Michigan (1988) interstate demonstration projects, funded by OCSE demonstration grants, reviewed files on initiating and responding interstate cases.
- Child Support Enforcement Collections on AFDC Cases—Non-Pursuit (OAI-05-87-00033), published in August 1987 by HHS's Office of Inspector General, reviewed a sample of cases that had been open at least 2 years but had not resulted in support orders.
- Analysis of Legal Remedies for Establishing, Modifying, and Enforcing Interstate Child Support Orders, a February 1987 Delaware study funded by an OCSE demonstration grant, described various options for pursuing interstate cases.
- Interstate Location Study, published by the California Parent Locator Service in August 1988, reviewed a sample of location requests sent by California to other SPLSS.
- Interstate Child Support Enforcement Model System, a study by the Center for Health Services Research, University of Southern California, funded by HHS, published in 1980, examined the interstate process.
- Previous GAO reports, including Interstate Child Support: Case Data Limitations, Enforcement Problems, Views on Improvements Needed (GAO/HRD-89-25, Jan. 27, 1989).

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## Work in Local Offices

We did fieldwork in San Diego and Alameda Counties in California, where we examined the process of initiating and responding to interstate cases and interviewed the personnel involved. We selected California because it has a large number of interstate cases; Alameda and San Diego are large counties in the northern and southern parts of the state. In April 1988, we reviewed Alameda County files on cases received from other states. We selected a random sample of 50 cases of the 187 cases received between January and March 1987, and examined the information that was provided by the initiating child support agencies and identified what had happened to those cases by April 1988. In San Diego we observed the court proceedings and traced several cases from intake through enforcement.

## Survey of SPLSSs

To obtain information concerning the extent and timeliness of SPLSSs, in June and July of 1988, we conducted a telephone survey of all 54 SPLSS (the 50 states, the District of Columbia, Puerto Rico, Guam, and the Virgin Islands). When SPLSS reported difficulties accessing state department of motor vehicle and employment databases, we conducted follow-up interviews with various state officials to determine the reasons for lack of quick access.

## Survey of Interstate Case Processors

In February 1989, we conducted a telephone survey of case initiators, central registries, and case responders in 10 states to determine their practices and views concerning the gathering of absent parent information in interstate cases and any changes that have occurred since implementation of the 1988 interstate regulations. We selected one state from each HHS region. We interviewed state central registry officials, as well as case initiators and responders in one major local office in each state. States and localities were selected to represent programs with varying organization structure, level of automation, and effectiveness. The states included in the survey account for about 50 percent of nationwide child support collections. The locations are shown in table III.1.

Table III.1: Case Processors Surveyed

Central registries	Local offices
Massachusetts	Boston (Dorchester)
New York	Onandaga County (Syracuse)
Pennsylvania	Allegheny County (Pittsburgh)
Florida	Hillsborough County (Tampa)
Michigan	Wayne County (Detroit)
Texas	San Antonio
Missouri	Jackson County (Kansas City)
Colorado	Denver
California	San Bernardino County
Idaho	Boise

## Discussions With Relevant Officials

To gather information on other sources of absent parent data and discuss possible improvements, we interviewed officials from

- the Office of Child Support Enforcement, including the Federal Parent Locator Service, concerning policies and procedures for obtaining information on out-of-state absent parents;

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**Appendix III**  
**Scope and Methodology Details**

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- the Department of Labor and the Interstate Conference of Employment Security Agencies, concerning nationwide access to employment data; and
  - the National Law Enforcement Telecommunications System, the Department of Justice, and the American Association of Motor Vehicle Administrators, concerning nationwide access to motor-vehicle data.

We also attended OCSE-sponsored conferences in 1988 and 1989, where interstate absent parent information issues were discussed by state and federal officials.

# SPLS Estimates of Average Response Time to Interstate Requests

<b>State</b>	<b>Time (in days)</b>	<b>State</b>	<b>Time (in days)</b>
Arizona	1	Alabama	30
Missouri	1	Kansas	30
Virginia	2	Montana	30
Nebraska	4	New Jersey	30
Iowa	8	Tennessee	30
Nevada	8	Utah	30
Idaho	10	Wyoming	30
New Mexico	10	Florida	31
Colorado	14	Kentucky	31
Illinois	14	Indiana	35
Minnesota	14	New Hampshire	35
North Carolina	14	Wisconsin	45
Vermont	14	Alaska	49
California	17	Massachusetts	49
Guam	17	Louisiana	53
Mississippi	18	Maryland	55
South Carolina	18	District of Columbia	60
North Dakota	20	Hawaii	60
Virgin Islands	20	Ohio	60
Connecticut	21	Oregon	60
Georgia	21	Puerto Rico	60
New York	21	South Dakota	60
Rhode Island	21	West Virginia	60
Texas	21	Michigan	75
Maine	24	Delaware	75
Pennsylvania	24	Arkansas	90
Washington	28	Oklahoma	90

Note: Based on a telephone survey of all 54 SPLSs (the 50 states, the District of Columbia, Puerto Rico, Guam, and the Virgin Islands) conducted in June and July 1988.

# Comments From the Department of Health and Human Services

 DEPARTMENT OF HEALTH & HUMAN SERVICES Office of Inspector General

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Washington, D.C. 20201

MAR 27 1990

Mr. Franklin Frazier  
Director, Income Security Issues  
United States General  
Accounting Office  
Washington, D.C. 20548

Dear Mr. Frazier:

Enclosed are the Department's comments on your draft report, "Interstate Child Support: Better Information Needed on Absent Parents for Case Pursuit." The comments represent the tentative position of the Department and are subject to reevaluation when the final version of this report is received.

The Department appreciates the opportunity to comment on this draft report before its publication.

Sincerely yours,  
  
Richard P. Kusserow  
Inspector General

Enclosure

Appendix V  
Comments From the Department of Health  
and Human Services

COMMENTS OF THE DEPARTMENT OF HEALTH AND HUMAN SERVICES ON  
DRAFT GAO REPORT "INTERSTATE CHILD SUPPORT: BETTER INFORMATION  
NEEDED ON ABSENT PARENTS FOR CASE PURSUIT"

GAO recommendation:

That the Secretary of HHS direct OCSE to require that initiating child support agencies exhaust all reasonable efforts to obtain address and employment information on out-of-State absent parents for use in deciding how best to pursue interstate cases.

Department comments:

Like GAO, we are concerned about the inadequacy of locate information in interstate cases. However, we believe new program operations standards, effective October 1990, and new regulations for interstate cases, effective in 1988, will substantially meet this recommendation and will contribute to more effective resolution of child support cases (see 45 CFR Part 303). These new rules, by establishing more stringent requirements for case management and tighter time frames for States to take action in child support cases, will alleviate many of the problems cited in this report.

Under the new program operations rules, States will be required to access all appropriate location sources, including the Federal Parent Locator Service (FPLS), public assistance offices, social services offices, and State employment and tax offices within 75 calendar days after determining that location services are necessary. In addition, the rules require States, within this time frame, to ensure that location information is sufficient to take the next appropriate action on a case. We believe these requirements will ensure that States take vigorous action in locating absent parents.

GAO recommendation:

That the Secretary of HHS direct OCSE to require initiating agencies to verify out-of-State parents' addresses with the Post Office before sending such cases to other States for action.

Department comments:

As with our above comments, we believe that the new rules, requiring States to access all appropriate location sources and to ensure that the location information is sufficient to proceed with next step in the case, will accomplish GAO's objective that location information be as accurate as possible.

We disagree, however, that the Department should specify to the degree stated in this recommendation how agencies ensure that

Appendix V  
Comments From the Department of Health  
and Human Services

location information is sufficient to proceed with a case. While States may use the U.S. Post Office in their location efforts and it is one source cited in Federal regulations as a source for location information, we do not believe that requiring Post Office verification is a necessary prerequisite for further case development. In fact, in some instances, it may be counterproductive to require verification with the Post Office, such as when the State has obtained a recent address and is reasonably certain of its validity. We believe agencies should act quickly upon obtaining such information, and that requiring Post Office verification could hinder absent parent location efforts.

GAO recommendation:

That the Secretary of HHS direct OCSE to require, by modifying existing performance standards, that responding State parent locator services quickly (preferably within one week) provide information from motor vehicle, employment, and other readily accessible sources when acting on other States' requests for such information.

Department comments:

Standards for program operations already establish clear time frames for States to take actions in each child support case for which the State is responsible. These time frames and requirements for action have been substantially strengthened in new rules.

Until an initiating State forwards a case using an interstate transmittal form, the case remains the responsibility of the initiating State to work on and resolve. This includes providing location services. Within 75 calendar days, according to new regulations, all appropriate location sources must be accessed and the sufficiency of the location information ensured.

When a State determines that a case requires interstate action, the initiating State must refer the case to the responding State's central registry. The case then becomes the responding State's responsibility. The responding State must then take appropriate actions, including providing location services, within time limits established in Federal regulations. These actions include forwarding to the State's parent locator service.

GAO recommendation:

That the Secretary of HHS direct OCSE to clarify that initiating child support agencies may request absent parent information directly from other States' parent locator services without sending the requests through the responding States' central registries.

Appendix V  
Comments From the Department of Health  
and Human Services

Department comments:

The Department concurs with this recommendation. The OCSE is currently in the process of clarifying this situation with the States and will soon issue guidance in this area.

In general, we believe that States, when attempting to locate an absent parent, should have the option of sending their request for location information to the responding States' central registries or directly to the other States' parent locator services. If the initiating State requests information directly from another State's parent locator service, the initiating State is still responsible for the case and thus, this action must be taken within the time frames specified in Federal regulations.

Alternatively, if the State chooses to forward the request for location information to a responding State's central registry using an interstate transmittal form, the case becomes an interstate case and the responding State must take actions in the case within specific time frames, as established in Federal regulations.

Technical comments

Page 3, second paragraph - The report incorrectly states that regulations require initiating agencies to "obtain absent parent information within 60 days (75 days effective October 1990)." More precisely, current regulations require that agencies use all State and local location sources within 60 days. New regulations, effective October 1990, require that, within 75 calendar days, agencies access all appropriate sources, including the FPLS, and ensure that information is sufficient to take the next action in the case.

Page 4, second paragraph - GAO asserts that initiating States often do not use the responding State's PLS because the responding State services are slow. This statement should be clarified to reflect the fact that when an initiating State transmits a case to a responding State, and creates an interstate case, the responding State must take appropriate action, including providing locate services if necessary, within 60 days (90 calendar days, effective October 1990).

Page 6 - GAO imprecisely states that Federal regulations require initiating States to provide other States with absent parent information that is "accurate" and "sufficient". Current regulations require States to refer cases to other States "if there is a reasonable belief that the absent parent may be present in such State." "Accurate" and "sufficient" refers to the forms involved in interstate referrals. The initiating State must provide the responding State "sufficient, accurate information to act on the case by submitting with each

Now on p 2.

Now on p 3

Now on p 4

**Appendix V  
Comments From the Department of Health  
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case any necessary documentation and either the Interstate Child Support Enforcement Transmittal Form or the URESA Action Request Forms package as appropriate." (emphasis added)

Now on p 9

Page 15, figure 1.1 - The statement that a child support agency "does not pursue (the) case if absent parent cannot be located" reflects current regulations. New regulations require repeat location attempts in cases where previous attempts have failed, including, at a minimum, quarterly submissions to State employment security files, and annual submissions to the FPLS.

Now on p 11

Page 19 - For the sentence beginning "OCSE lengthened the time...", we suggest the following language which more accurately reflects the regulatory change:

OCSE lengthened the time to allow for access to the Federal Parent Locator Service, to ensure the sufficiency of information received, and to allow adequate time for States which do not yet have automated access to sources.

Now on p 13

Page 22 - Contextual information would be useful here to clarify that the situations described (no location attempts, failed location) are inconsistent, or soon will be, with federal policy. New and current regulations require that IV-D agencies attempt to locate all absent parents; new regulations require repeat location attempts where previous attempts have failed.

Now on p. 17

Page 29 - GAO asserts that OCSE has not established time frames for responding States to respond to initiating State's location information requests. As previously mentioned, when initiating States refer a case to another State's central registry, it becomes an interstate case. In such instances, OCSE has established time frames for responding States to act, including time frames for location activities.

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