

**Enforcement remedies:
getting more resources for
Minnesota families.**

MFSRC October 2016

INSURANCE MATCH

Insurance match

- CAAD T0025 INSURANCE MATCH - SEE REPORT ON DHS-SIR
 - SEE REPORT DATED 20160927
 - DHS-SIR > PRISM > Documentation > Reports and Resources
 - Insurance Match
 - STW Insurance Match w PRISM 20160927

Cnty	Worker ID Number	Case Number	NCP Name	Oblig SSN	Rcd Create Date	MCI	FN	LN	Insured SSN	Insurer Name	Contact Name
047	047xxx03	001216xxxx	01 IAN KING,	46880xxxx	20160907	xxx38481	IAN	KING	468xx1234	FAKE SURANCE PROPERTY & CASUALTY	BRUCE WAYNE

In the past 18 months, insurance match has collected ~\$52,000 in lump sum payments and ~\$267,000 in ongoing payments from 90 different NCPs.



PASSPORT

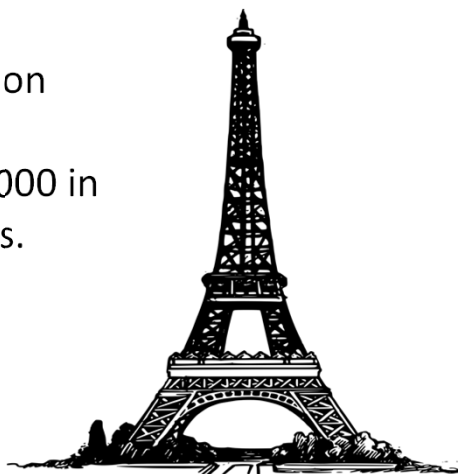
Passport

- MN is a 'pay or stay' state; all current support and arrears must be paid off before passport hold is lifted.
- Very few exceptions:
 - Life or death of an immediate family member in another country
 - Mistake of fact
 - Court order

- Travel required for employment under **very limited** circumstances:
 - Letter from employer stating travel is required to keep job
 - Income withholding in place
 - Good faith payment = 120% of current support

****REFER ALL PASSPORT
INQUIRIES TO CSPC****

In 2015 CSD fielded
passport questions on
over 687 cases and
collected over \$95,000 in
lump sum payments.



REPORTING CHILD SUPPORT ARREARS TO CONSUMER REPORTING AGENCIES

Implementation of Minnesota Statute 518A.685

42 U.S. Code § 666

- States must have laws in effect providing for several enforcement remedies
- One of these is reporting arrearages to credit bureaus
- Must periodically report name of delinquent obligors and amount of overdue support

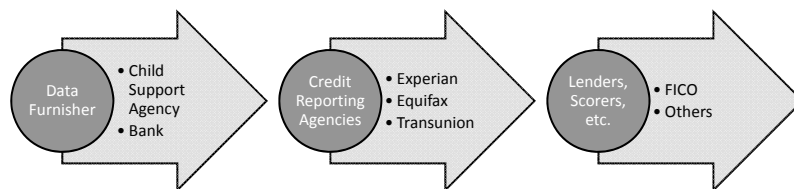
Minnesota Statute 518A.685

- Sought to codify procedures: threshold, notice requirement, administrative review
- Sought to provide for positive reporting of obligors with arrears but making payments
- Requires following “industry standards.”

Threshold and Criteria

- 3x monthly accrual
- \$1.00 if no accrual exists
- No active bankruptcy before 10/16/05
- Can't be debt w/ non-accrual

Credit Report vs. Credit Score



Metro 2

- “Despite the competitive and organizational barriers within the credit industry, the consumer reporting agencies continue to work together to develop, maintain and enhance an industry-standard reporting format. The task force’s mission is to provide a standardized method for the reporting of accurate, complete and timely data.”

Data String

```
CHAR      -   * ID NUMBER             01ACCOUNT NUMBER             R18             REV
ZONE 0B000B00F062994754CC4DEDCCD4444444444FFCCCEDE4DEDCCD4444444444444444DFF054990000000070DCE400000000
NUMR 4800440000019100C094054425900000000000112364530544259000000000000009180019C0010C0005C9550005C000
   01...5...10...15...20...25...30...35...40...45...50...55...60...65...70...75...80...85...90...95.....
CHAR      1102200000BBBBBBBBBBBBBBBBBBB                                     SURNAME
ZONE 10FFFFFFFFF00000000000000044440002000000000001199000000000011994444444444444444EEDDCDC4444444
NUMR 0C110220000022222222222222222200000000C0000C0000C0019C0000C0000C0019C00000000000000024951450000000
   101...5...10...15...20...25...30...35...40...45...50...55...60...65...70...75...80...85...90...95.....
CHAR      1ST NAME                     MIDDLE NAME                     2                   <2 US1ST LINE OF ADDRESS
ZONE 4444444444FEE4DCDC444444444444DCDCDC4DCDC444444444F13S7901199095524F44EEFEE4DCDC4DC4CCDCCEE44444444
NUMR 00000000000123051480000000000049443051480000000022468C0014C99513C20042123039550660144952200000000
   201...5...10...15...20...25...30...35...40...45...50...55...60...65...70...75...80...85...90...95.....
CHAR      2ND LINE OF ADDRESS          CITY                         ST123451234Y J1 SURNAME              1S
ZONE 44444FDC4DCDC4DC4CCDCCEE4444444444444444444444444444EEFFFFF4DF4EEDDCDC4444444444444444FE
NUMR 0000025403955066014495220000000000000000000000000000002212345123480110249514500000000000000012
   301...5...10...15...20...25...30...35...40...45...50...55...60...65...70...75...80...85...90...95.....
```


Field Definitions

- (8) Portfolio Type
- (13) Terms Duration
- (15) Scheduled Monthly Payment Amount
- (16) Actual Payment Amount
- (17A) Account Status
- (18) Payment History Profile
- (19) Special Comment
- (20) Compliance Condition Code

Portfolio Type; Terms Duration

- Open (Portfolio Type)
- Accounts where the entire balance is due upon demand or that have one payment due as scheduled (i.e., Terms Duration = 001). This Portfolio Type is used by credit card reporters when the full balance amount is due each month (i.e., no revolving terms). This Portfolio Type is also used by Collection Agencies, Child Support Agencies, Debt Buyers, Student Loan Guarantors, the U.S. Department of Education (as guarantor) and Utility Services' payment plans.
- (Contrasted with: Line of Credit, Installment, Mortgage, Revolving)

Scheduled Monthly Payment Amount; Actual Payment Amount

- **Scheduled Monthly Payment Amount:** Report the dollar amount of the scheduled monthly payment due for this reporting period, whether principal, interest only or a combination of the two. Report in whole dollars only.
- **Actual Payment Amount:** Report the dollar amount of the monthly payment actually received for this reporting period in whole dollars only.

Account Status

- **11 (Paid in full; ongoing support)**
- **13 (Paid in full; no ongoing support; \$0)**
- **62 (Paid in full; previously in collections)**
- **71, 78, 80, 82-84 (Age of oldest arrears)**
- **93 (Collections)**
- **DA (Delete Account)**
- **05 (Interstate case)**

Payment History Profile

- Contains up to 24 months of consecutive payment activity for the previous 24 reporting periods prior to the Date of Account Information (Field 24) being reported. Report one month's payment history in each byte from the left to right in most recent to least recent order. The first byte should represent the Account Status Code reported in the previous reporting period.
- Example: 000011000000EEEE0000BBBB

Special Comment

- When Status 71, 78, 80, 82-84 or 93 is reported, the account should be reported with a Special Comment "CS" each month in order to overlay the date of first delinquency. Special Comment "CS" is reported only until the child or youngest child reaches the age of majority or emancipation, or the statute of limitations for judgments in that state has been reached.

Compliance Condition Code

- **Disputes**

- **XB:** Account information disputed by consumer under the Fair Credit Reporting Act. Definition: Reported when the completeness or accuracy of the account information is disputed by the consumer under the FCRA and investigation of the dispute is in progress by the data furnisher.
- **XC:** Completed investigation of FCRA dispute — consumer disagrees. *Definition: Reported when the investigation of an FCRA dispute has been completed by the data furnisher; however, the consumer disagrees with the outcome of the investigation.*
- **XH:** Account previously in dispute — investigation completed, reported by data furnisher (To be used for FCRA or FCBA disputes). *Definition: Reported when the investigation of a dispute by the data furnisher was completed.*
- **XR:** Removes the most recently reported Compliance Condition Code

CRCD Old

```

V4FNKN01          PRISM          In: PWQQ60 via QQT4 @A08 PWCST01
01/07/09          Credit Bureau Detail          1:05 PM
*Action (B,C,D,N):
MCI: 0032696296 Submission Month: 12/2008
MCI: 0032696296 Name: CANDLE, WILLIAM A.
SSN: 473-01-4456 DOB: 07/07/76 Gender: M Number of Cases: 1

Initial Date Reported: 09/30/2008          Disputed (Y or blank):
Run Date: 12/31/2008          Amount Reported: 1023.69
Account Status: 93          Compliance Condition Code:

          Case Detail Information          Reporting
          Case ID  Oblig  Seq  Arrears Balance  Status
1_
oF 1    0032696295 01    CCH  01          1023.69    SUB
          _____
          _____
          _____
          _____
          _____

Direct Command:          ( CRCD )
F1=Help, F2=Quit, F3=Retrn, F4=Prev, F7=Up, F8=Down, F13=TRBL, F18=Main, F19=Glob
F20=Audit
CRB detail 0032696296-266258 displayed successfully
    
```

CRCD New

```

V4FHNK01          PRISM          In: PWQQ60 via QQT4 @A08 PWCST01
06/16/2016          Credit Bureau Detail          1:05 PM
*Action (B,C,D,N):
MCI: 0000000002 Submission Month: 06/2016
MCI: 0000000002 Name: CANDLE, WILLIAM A.
SSN: 473-01-4456 DOB: 07/07/86 Gender: M Number of Cases: 2

Initial Date Reported: 10/13/2012          Disputed (Y or blank):
Run Date: 06/11/2016          Amount Reported: 520.73
Account Status: SO          Compliance Condition Code:

```

	Case ID	Oblig	Seq	Arrears Balance	Reporting Status
1_	0000000001 01	CCH	01	487.61	SUB
of 2	0000000001 01	CMS	01	33.12	SUB
	---	---	---	---	---
	---	---	---	---	---
	---	---	---	---	---
	---	---	---	---	---

```

Direct Command: ( CRCD )
F1=Help, F2=Quit, F3=Retrn, F4=Prev, F7=Up, F8=Down, F13=TRBL, F18=Main, F19=Glob
F20=Audit
CRB detail 0000000002-266258 displayed successfully

```

CRCD Browse Old

```

VUFNKO01          PRISM          In: PWQQ60 via QQT4 @A08 PWCST01
01/07/09          Credit Bureau Detail          1:04 PM
MCI: 0032696296 Name: CANDLE, WILLIAM A.
SSN: 473-01-4456 DOB: 07/07/76 Gender: M Number of Cases: 1

```

Submission Month	Amount Reported	Initial Date Reported
12/2008	1023.69	09/30/2008
11/2008	1244.34	09/30/2008
10/2008	1599.70	09/30/2008
09/2008	1489.14	09/30/2008
08/2008	0.00	09/30/2008
*** End of Data ***		

```

MCI: 0032696296 Submission Date:
Direct Command: ( CRCD )
F1=Help, F2=Quit, F3=Retrn, F4=Prev, F7=Up, F8=Down, F13=TRBL, F18=Main, F19=Glob
Position cursor or enter screen value to select

```

CRCD Browse New

```

VUFNR001          PRISM          In: PWQQ60 via QQT4 @A08 FWCST01
06/16/16          Credit Bureau Detail          1:04
PM MCI: 0000000002 Name: CANDLE, WILLIAM A.
SSN: 473-01-4456 DOB: 07/07/86 Gender: M Number of Cases: 2
  
```

Submission Month	Amount Reported	Initial Date Reported	Account Status
06/2016	520.73	10/13/2012	80
05/2016	520.73	10/13/2012	93
04/2016	346.59	10/13/2012	93
03/2016	173.00	10/13/2012	93
02/2016	3.83	10/13/2012	93
01/2016	1094.05	10/13/2012	93
12/2015	1090.45	10/13/2012	93
11/2015	1086.97	10/13/2012	93
10/2015	1083.38	10/13/2012	93
09/2015	1079.90	10/13/2012	93
08/2015	2960.43	10/13/2012	93

```

MCI: 0000000002 Submission Date: _____
Direct Command: _____ ( CRCD )
F1=Help, F2=Quit, F3=Retrn, F4=Prev, F7=Up, F8=Down, F13=TRBL, F18=Main, F19=Glob
Position cursor or enter screen value to select
  
```

Obligor Contest

- Administrative Review
 - After notice and *before* submission
 - Follow process documented in SIR MILO
- Dispute
 - Obligor follows CRA process
 - DHS is contacted via e-OSCAR
 - DHS provides the requested information (manual process; no direct PRISM interface)

Dispute Process

- Obligor contacts one of the CRAs
- Transunion:
<http://www.transunion.com/credit-disputes/dispute-your-credit>
- Equifax:
<https://www.ai.equifax.com/CreditInvestigation/home.action>

DLS

Driver's License Suspension

What does PRISM do?

- Criteria
- Selection
- Notice
 - Payment Agreement
 - No Payment Agreement

What does PRISM do?

- Active Suspension
 - Payment Agreement
 - Motion to reinstate the DL
 - Court Order

What should the worker do?

- Payment Agreement
- Court Order
- Interface did not work
- NCP is at a truck stop and DL is suspended
- NCP needs DL for work
- Don't suppress let PRSIM do it's thing

FIDM

Financial Institution Data Match

FIDM

- CSO manual review
- Verify the SSN
- Verify Account holder name
- Threshold
- Criteria
- FIDM Levy Checklist created by CLV

CSOs may not use FIDM because?

- Small community
- No account balance
- Fear of joint accounts
- Unsure of the process
- Strained relationship with FI
- FIDM Distribution
- Already paying via IW
- Not sure of exemptions

The FIDM enforcement remedy continues to be under-utilized as demonstrated in the table below.

Comparison between May 2010 and Jan 2015 data:	May 2010	Jan 2015	
# Unique NCPs eligible for levy per month	7,582	15,886	
Number of Levies declined	10,441	19,605	
Reasons for levy decline			
BAL = account balance is low	9,215	17,370	
BNK = The NCP has filed Bankruptcy	1	0	
CRT = court order prohibits	11	6	
INT = initiating interstate action involved	192	484	
LOW = low arrears	57	77	
OFF = threshold not met due to offset	0	1	
PA = NCP funds all public assistance	27	36	
SUP = supervisor decision to not initiate levy	880	1,569	
WRG = wrong person	58	62	
Cases eligible for levy with arrears less than \$5,000 per month	3,880	9,283	
Cases eligible for levy with arrears greater than \$5,000 per month	6,280	13,740	
Number of levies completed by counties May 2010, Jan 2015	201	284	
Levy action initiated by notice to FI and NCP			
Number of levies completed by counties since FIDM began	24,719	38,300	
Total of FIDM collections received in May 2010, Jan 2015	\$120,983.38	\$121,675.90	
Total FIDM collections since FIDM began	\$19,288,405.31	\$30,554,833.58	
Avg # FIDM hearings per month June 1, 2009-May 31, 2010, and Jan 1, 2014-Jan 31, 2015	4.75	3.0	
May 2010: Statewide: out of 13,715 matched accounts, 5,555 (about 40%) had \$0, negative, or not reported (NR) balance.			
January 2015: Statewide: out of 23,023 matched accounts, 9,354 (40%) had \$0, negative, or not reported (NR) balance.			

EIWO

Electronic Income Withholding Order

What's EIWO?

- Send income withholding electronically to an employer
- Required by the Federal Office of Child Support Enforcement (OCSE)
- Employers contact OCSE to sign up
- We must send IW electronically

How does EIWO work?

- Monthly file from OCSE
 - This file updates the PRISM Employer table
- Needs INWD record created
- Overnight processing
- **May** receive an acknowledgement back from employer

What types are there?

- EIWO Type:
 - AMD AMENDED
 - EMP EMPLOYER INITIATED
 - LUM LUMP SUM
 - ORG ORIGINAL
 - TRM TERMINATION

More about EIWO

- How do I resend the EIWD record?
- Issues we have seen:
 - Removing Interstate Initiating code to build IW
 - Incorrect Acknowledgements from employers

**So, what is one thing you will
do differently to get more
money to MN families?**

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