



## **EASTERN REGIONAL INTERSTATE CHILD SUPPORT ASSOCIATION**

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### **Comments by the Eastern Regional Interstate Child Support Association on the Proposed Changes to the Income Withholding Order/Notice for Support (IWO) OMB #0970-0154**

#### **I. Introduction**

The Eastern Regional Interstate Child Support Association (ERICSA) is a not-for-profit organization of child support professionals from government agencies, the private sector, the bench, and the bar. Its mission is to build a stronger intergovernmental child support community by developing and advocating effective policy, facilitating communication, and delivering innovative professional training to enhance the well-being of families.

Founded in 1963, ERICSA historically has drawn its membership from tribes and states that border on, or are east of, the Mississippi River. ERICSA holds an annual training conference and provides policy positions on key issues affecting child support.

The Federal Office of Child Support (OCSE) proposes changes to the Income Withholding Order/Notice for Support (IWO) and Instructions posted to the Federal Register, on page 69382, Volume 84, Number 243. ERICSA provides comments herein to the proposed changes.

#### **II. ERICSA'S Comments on the Income Withholding Order/Notice for Support (IWO)**

##### **In General:**

##### **ERICSA Comment:**

The addendum was eliminated. We are very concerned that there is no provision for multiple cases / amounts to be withheld by an employer. It will be very confusing for an employer to receive multiple withholding orders for the same employee/obligor.

## **Section V. Remittance Information**

### ERICSA Comment:

The first paragraph discusses what employers are to do if they cannot withhold the full amount of support. It is anticipated that the paragraph will be confusing to employers and result in either a delay or complete failure to withhold support.

Further, the section should be restructured so that the third paragraph discussing the Consumer Credit Protection Act (CCPA) is moved to become the second paragraph. Again, it is anticipated that the current structure of the section will result in confusion for the employers and could result in their withholding too much support in violation of the CCPA.

## **Section VII. Notification of Employment Termination or Income Status: (Completed by the Employer/Income Withholder)**

### ERICSA Comment:

Two additional check boxes would be beneficial so that an employer could indicate whether the employee's/obligor's employment was terminated or if the employee/obligor left employment voluntarily. The information would be beneficial to local child support enforcement agencies when they are attempting to enforce the order.

Sincerely,



Patrick Quinn, President

[www.ericisa.org](http://www.ericisa.org)



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