



EASTERN REGIONAL INTERSTATE CHILD SUPPORT ASSOCIATION

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April 8, 2014

The Honorable Ron Wyden
Chairman, Senate Committee on Finance
219 Dirksen Senate Office Building
Washington, DC 20510-6200

The Honorable Orrin G. Hatch
Ranking Member, Senate Committee on Finance
219 Dirksen Senate Office Building
Washington, DC 20510-6200

Re: S. 1870; Supporting At-Risk Children Act
S. 1877; Child Support Improvement and Work Promotion Act

Dear Chairman Wyden and Ranking Member Hatch,

I am writing on behalf of the Eastern Regional Interstate Child Support Association (ERICSA). ERICSA is a not-for-profit organization of child support professionals that promotes the interests of children who are owed child support. ERICSA is a leading advocate for effective intergovernmental child support case processing and actively participates in efforts to improve the laws, policies, and practices that govern intergovernmental child support.

Founded in 1963, ERICSA historically has drawn its membership from persons working for or doing business with Tribes and States and their local jurisdictions that border on, or are east of, the Mississippi River. ERICSA holds an annual training conference and provides policy positions on key issues affecting the national child support program.

We strongly support section 311 of S.1870 (section 101 of S.1877), which contains language necessary to implement the Hague Maintenance Convention in the United States. ERICSA has a long-standing commitment to the U.S. ratification and implementation of the Hague Convention on the International Recovery of Child Support and other Forms of Family Maintenance. We believe it will help children receive child support, regardless of the country in which their parents live, by standardizing the international child support processes. This section includes the requirement that states enact the Uniform Interstate Family Support Act (UIFSA) 2008. We believe there is universal agreement among child support professionals that UIFSA 2008 should be the required law in every state. ERICSA is an active partner with the Uniform Law Commission Drafting Committee, which drafted UIFSA 2008. One or more ERICSA representatives served as official UIFSA observers, participating fully in the creation of the original UIFSA in 1992, subsequent amendments in 1996 and 2001, and most recently in the development of the international provisions in 2008. UIFSA has instilled fairness and

harmonized legal proceedings in intergovernmental child support cases, to the benefit of all parties, and most importantly to the children for whom child support was so difficult to establish and enforce under predecessor state laws. Enactment of subsection (g) of section 311 is also critical in order to ensure that the language in the federal Full Faith and Credit for Child Support Orders Act is consistent with the language that is now in UIFSA 2008.

ERICSA also supports section 313 of S.1870 (section 103 Of S.1877) giving the Federally Certified Tribal IV-D Programs direct access to the Federal Parent Locator Service in the same way and with the same safeguards as state and local IV-D programs. As stated in our enclosed September 9, 2013 position paper, we believe that certified Tribal IV-D programs should have access to the same information and programs as State IV-D programs do to increase locate, establishment, enforcement, and interstate reconciliation efficiency and success for the children they serve.

We do not support the mandate in section 314 of S. 1870 (section 104 of S. 1877) requiring that all state child support agencies provide parenting time services, for many of the same concerns raised by the National Council of Child Support Directors (NCCSD) and the National Child Support Enforcement Association (NCSEA). While section 314 addresses an activity that ERICSA supports in general –the concept of addressing shared parenting time in child support cases – we believe more research and analysis needs to occur before it is mandated for all child support cases. Over the past decade, some child support programs have been participating in shared parenting determinations, supported more recently by their ability to use IV-D Incentive funds for shared parenting activities through the federal Office of Child Support Enforcement (OCSE) waiver process. Research shows that where parents have access to their children and shared parenting, there is an increase in the payment in child support. Based on that research and the experience of states where the child support agency already participates in establishing parenting time arrangements, ERICSA would support federal funding for states that exercise the option of providing parenting time services, if that option became available through separate legislation. We also support including additional research into the role of child support agencies in establishing parenting time arrangements within the study of the National Child Support Task Force created pursuant to section 321 of S. 1870 (section 201 of S. 1877).

ERICSA supports section 321 of S. 1870 (section 201 of S. 1877) which mandates the creation of a National Child Support Task Force. We would welcome the opportunity to assist the Task Force in any capacity.

Thank you for your consideration of ERICSA’s comments. If you have any questions, please feel free to contact me at (417) 829-6331 or by email at: LFors@greencountymo.org.

Sincerely,



Lara Webb Fors
President, ERICSA

Enclosure
Cc: Members of the Senate Finance Committee