

Department of Health and Human Services

**OFFICE OF
INSPECTOR GENERAL**

**REVIEW AND ADJUSTMENT OF IV-D
CHILD SUPPORT ORDERS**



JUNE GIBBS BROWN
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OFFICE OF INSPECTOR GENERAL

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To obtain a copy of this report, call the Kansas City Regional Office at (800)241-2527.

EXECUTIVE SUMMARY

PURPOSE

To determine the status of States' progress in, and major barriers to, fully implementing the review and adjustment provisions for child support orders as required by the Family Support Act of 1988.

BACKGROUND

Effective October 13, 1990, States are required to develop a plan for review and adjustment of child support orders; initiate a review, should either parent or the IV-D agency request one; and adjust support orders, where appropriate, in accordance with State established guidelines. Additionally, effective October 13, 1993, States are required to have implemented procedures whereby support orders will be reviewed no later than 36 months from the date of establishment or last review, and adjusted in accordance with States' guidelines for support award amounts.

These recent amendments of the Family Support Act of 1988 reflect Congressional concern in this area and its intent that an adjustment to a current child support order be easier to obtain, and that such adjustment should be based on States' rebuttable child support guidelines.

This report is based on self-reported data from a mail survey which was sent to each of the 54 State Child Support Enforcement agencies. All agencies responded.

STATUS OF STATES' REVIEW AND ADJUSTMENT PROCESSES

All State child support agencies have written procedures/guidelines in place to demonstrate how their review and adjustment process is to function.

We verified this by obtaining copies of agencies' written procedures/guidelines.

Regardless of procedures/guidelines being in place, two-thirds of State child support agencies acknowledge being behind in the review and adjustment requirements.

Thirty-six (66 percent) of the child support agencies reported they are behind in processing cases due for review.

Three-quarters of State child support agencies lack an advanced automated system which has hindered their meeting the review and adjustment requirements.

Forty-one (76 percent) of the child support agencies reported that their current automated system is antiquated causing problems and delays in processing review and adjustment cases. Also, they are unable to produce statistical data from which

management reports can be generated. All agencies did report they intend to have advanced automated systems by September 30, 1995.

Almost half the State respondents cite a lack of staffing resources as another obstacle in processing the large number of review and adjustment cases.

Twenty-four (44 percent) of the child support agencies responded that their current number of staff is unable to handle the large review and adjustment caseload.

Three out of ten State child support agencies indicated that the inconsistency by States in enforcing two separate interstate laws makes it difficult and causes delays in the processing of review and adjustment cases.

Sixteen (thirty percent) of the State child support agencies report delays in processing interstate cases due to two interstate laws, the Uniform Reciprocal Enforcement Support Act (URESA), later revised and enacted as the Revised Uniform Reciprocal Enforcement of Support Act (RURESA), and the Uniform Interstate Family Support Act (UIFSA).

While all 54 States and territories had previously adopted some form of URESA/RURESA as a matter of State law, concerns existed about State-to-State variances in statute enforcement. In response, a new model act, UIFSA, was approved and enacted in varying extent by 22 States. This model was endorsed by the U.S. Commission on Interstate Child Support.

There are specific differences in these laws. Under URESA/RURESA, more than one valid order could exist in a case at any one time, which causes confusion in calculating an arrearage or determining which order to enforce. Under UIFSA, only one support order is in effect in a case at any one time and only that State has the right to change the order.

State child support agencies report several other barriers which present problems and delays in processing review and adjustment cases.

Other barriers reported include the judicial process being too cumbersome, the court system being too overloaded, conflict of interest issues, fiscal constraints, and inadequate training/guidance from the Federal government.

OPPORTUNITIES FOR ACF TO IMPROVE STATES' REVIEW AND ADJUSTMENT PROCESSES

The Administration for Children and Families (ACF), Office of Child Support Enforcement, has helped State child support agencies progress in this area. We recognize that ACF is in no position to provide financing to overcome States'

perceived resource limits or address every barrier reported. However, we suggest that ACF continue monitoring the situation and helping the States as much as possible. In particular ACF should:

- Communicate with States to determine their status in updating their automated systems, and continue to encourage and assist them in whatever ways possible to meet the October 1, 1995 deadline for having in effect an operational and certified computerized support enforcement system. The updated systems could ease the burden of limited staff, aid substantially in overcoming time delays, and provide an information retrieval system for statistical management reports.
- In anticipation of a Federal mandate requiring all States to enact UIFSA, continue technical assistance activities through training sessions on UIFSA, and using experienced child support practitioners in UIFSA to discuss and resolve implementation issues with those States which have not yet enacted UIFSA.
- Continue to provide guidance and technical assistance to States helping them implement and fully understand their requirements for review and adjustment.

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INTRODUCTION

PURPOSE

The purpose of this study is to determine the status of States' progress in fully implementing the review and adjustment provisions set out in Section 103(c) of the Family Support Act of 1988.

BACKGROUND

Legislation/Regulations

The Administration for Children and Families (ACF), Office of Child Support Enforcement (OCSE), is the organizational unit responsible for the administration of the IV-D program. Section 103(c) of the Family Support Act of 1988 (P.L. 100-485) requires the review and, as appropriate, adjustment of child support orders being enforced under the IV-D program. Under section 103, the Social Security Act was amended by adding a new section 466(a)(10)(A), effective October 13, 1990, which required States to: develop a plan for review and adjustment of support orders; initiate a review, in accordance with the plan, should either parent or the IV-D agency request a review; and adjust support orders, where appropriate, in accordance with State established guidelines.

Additionally, a new section 466(a)(10)(B), effective October 13, 1993, required States to have implemented procedures whereby support orders enforced under title IV-D will be reviewed not later than 36 months from the date the order was established or last reviewed and adjusted in accordance with the States' guidelines for support award amounts. There are, however, the following exceptions: (1) in AFDC cases when it is determined that the review would not be in the best interest of the child and neither parent has requested a review; and (2) in non-AFDC cases where neither parent has requested a review.

Under this legislation, States must notify each parent of the intent to review the child support order and of their right to request such a review be conducted. Also, each parent must be notified of a proposed adjustment in the award amount (or a determination that there should be no change) and of the right to challenge such adjustment or determination.

The *Federal Register*, Vol. 57, No. 249, dated December 28, 1992, states that historically, most child support orders were not adjusted over the life of the order, and thus failed to reflect circumstances which changed over time. Also, many times parents failed to request adjustments because of the difficulty in proving such changed circumstances. These recent provisions reflect Congressional concern in this area and its intent that an adjustment to a current child support order be easier to obtain, and that such adjustment should be based on States' rebuttable child support guidelines.

Proposed regulations governing review and adjustment were published on August 15, 1990. Final regulations governing the requirements effective October 13, 1990, were published July 10, 1992. Final regulations governing the requirements effective October, 13, 1993, were published December 28, 1992, at 45 CFR 302 and 303.

METHODOLOGY

Preliminary activities undertaken in this inspection included reviewing applicable laws and regulations. We held interviews with ACF/OCSE regional office staff to obtain a perspective on their oversight activities for the region's four States. We developed a survey document for the study and tested its effectiveness in two States, following up with these States to discuss the information reported. We then made any necessary revisions to the survey document. Contacts were also made with the ACF/OCSE regional offices to determine if any reviews had been conducted. We concluded these preliminary activities meeting with ACF/OCSE headquarter's staff and discussed how we planned to carry out our study.

The survey was mailed to each of the 54 State Child Support Enforcement agencies. The survey contained primarily closed-ended questions and some open-ended questions which were designed to retrieve responses that would address the purpose of the study. States were also asked to submit copies of their written procedures/guidelines for processing review and adjustment cases. All of the child support agencies responded.

Following receipt and review of the survey documents, telephone contacts were made to some child support agencies to clarify any questions raised by the information provided in the survey. In some instances, child support agencies qualified some responses with additional information and our interpretation was necessary in determining the specific detail of the answer. Content analysis was used in determining the results of the responses provided in the surveys.

Our intent in conducting this study was not to determine precisely how far behind or ahead of schedule each State is in implementing the recent amendments regarding review and adjustment of child support orders. Our preinspection work made it clear to us that most States had fallen behind. We wanted to identify the rough order of magnitude of the problem and identify the chief barriers that States believed that they were facing. The self-reported data we gathered provided an appropriate basis for doing that.

We conducted our review in accordance with the *Quality Standards for Inspections* issued by the President's Council on Integrity and Efficiency.

STATUS OF STATES' REVIEW AND ADJUSTMENT PROCESSES

Based on our understanding of the review and adjustment process, and on our discussions with ACF and State officials, we identified the key steps which we believe would be necessary for States to fully implement the new amendments. We then used the survey results to determine the progress made by each State. The results are tabulated in Appendix A. Following is a summary of key elements of that analysis.

All State child support agencies have written procedures/guidelines in place to demonstrate how their review and adjustment process is to function.

All 54 State child support agencies reported in the survey documents that they have procedures/guidelines in place to demonstrate how their review and adjustment process is to function. This was substantiated with copies of the procedures/guidelines supplementing the survey responses.

Regardless of procedures/guidelines being in place, two-thirds of State child support agencies acknowledge being behind in the review and adjustment requirements.

Thirty-six, or 66 percent, of the child support agencies reported that they are behind in processing those cases which are currently due for review and/or adjustment. Additionally, based upon the overall responses of the support agencies, only five (10 percent) appear to be fully operational, including an adequate automated system, to process review and adjustment cases.

Three-quarters of State child support agencies lack of an advanced automated system which has hindered their meeting the review and adjustment requirements.

Forty-one, or 76 percent, of the child support agencies reported that their current automated system is antiquated causing problems and delays in carrying out the review and adjustment process. In addition, the agencies reported that without an advanced automated system they are unable to produce statistical data from which management reports can be generated. All of the child support agencies indicated they intend to have an advanced automated system prior to September 30, 1995.

Almost half the State respondents cite a lack of staffing resources as another obstacle facing State child support agencies in processing the large number of review and adjustment cases.

Twenty-four (44 percent) of the 54 child support agencies responded in their survey that their current number of staff is insufficient to handle the large caseload brought about by the review and adjustment provisions.

Three out of ten State child support agencies indicated that the inconsistency by States in enforcing two separate interstate laws makes it difficult and causes delays in the processing of review and adjustment cases.

Sixteen (30 percent) of the State child support agencies report experiencing delays in processing interstate cases due to the existence of two interstate laws, the Uniform Reciprocal Enforcement of Support Act (URESAs), later revised and enacted as the Revised Uniform Reciprocal Enforcement of Support Act (RURESAs), and the Uniform Interstate Family Support Act (UIFSA).

All 54 States and territories had previously adopted some form of URESAs/RURESAs as a matter of State law, although Federal law under Title IV-D does not mandate that States have such laws or that State URESAs/RURESAs laws be consistent or uniform. In response to concerns about State-to-State variances due to inconsistent enactment, application, and interpretations of URESAs/RURESAs, a new model act was approved and enacted, the Uniform Interstate Family Support Act (UIFSA). This model act, was endorsed by the U.S. Commission on Interstate Child Support, which urged Congress to mandate verbatim adoption of UIFSA by all States and territories. To date, 22 States have enacted UIFSA though not necessarily in its entirety.

The primary difference between the two laws is, under URESAs/RURESAs, most support proceedings are *de novo*, i.e., treated as new cases, resulting in more than one valid, co-existing order in a case. This causes confusion when calculating an arrearage or determining which order to enforce. Under UIFSA, only one support order is in effect in a case at any one time. The method of enforcing the one order theory allows only one State the right to change the order at any one time. This one State has what is referred to as "continuing exclusive jurisdiction" over the case.

State child support agencies report several other barriers which present problems and delays in processing review and adjustment cases.

In addition to the more serious barriers mentioned above, child support agencies reported various other problematic conditions, such as the judicial process being too cumbersome, the court systems being too overloaded, conflict of interest issues, fiscal constraints, and inadequate training/guidance from the Federal government. Appendix B presents the list of barriers to the review and adjustment process as reported by the child support agencies.

OPPORTUNITIES FOR ACF TO IMPROVE STATES' REVIEW AND ADJUSTMENT PROCESSES

The ACF, Office of Child Support Enforcement, has helped State child support agencies progress in meeting the provisions for reviewing and adjusting IV-D child support orders. We recognize that ACF is in no position to provide financing to overcome states' perceived resource limits or address every barrier reported. However, we suggest that ACF continue monitoring the situation and helping the States as much as possible. In particular ACF should:

- Communicate with States to determine their status in updating their automated systems, and continue as before, to encourage and assist them in whatever ways possible to meet the October 1, 1995 deadline for having in effect an operational and certified computerized support enforcement system. The ACF has successfully assisted some States with technical assistance workshops regarding the implementation of their systems, as well as some specialized workshops for States implementing systems based on like designs. However, other States may also be encountering problems. Planned technical and policy implementation workshops, on-site visits to States by Federal staff and the implementation of enhanced electronic communication capabilities between ACF and States definitely are positive steps. These kinds of activities can bring about the updated systems which could ease the burden of limited staff resources, aid substantially in overcoming time delays, and provide an information retrieval system for statistical management reports.
- In anticipation of a Federal mandate requiring all States to enact UIFSA, continue technical assistance activities through training sessions on UIFSA, as well as Federal/State workshops to design necessary interstate forms, and using experienced child support practitioners in UIFSA to discuss and resolve implementation issues with those States which have not yet enacted UIFSA.
- Continue to provide guidance and technical assistance to States helping them implement and fully understand their requirements for review and adjustment. Those activities already undertaken, such as the distribution of various training publications and personal staff presentations at numerous training conferences, are beneficial towards States' moving to implement a fully operational review and adjustment process.

APPENDIX A

COMPOSITE OF STATE RESPONSES

COMPOSITE OF STATE RESPONSES REFLECTING PROBLEM AREAS
IN PROCESSING REVIEW AND ADJUSTMENT CASES

FACTORS OF STATE'S REVIEW AND ADJUSTMENT PROCESS	STATES																	
	AL	AK	AZ	AR	CA	CO	CT	DE	DC	FL	GA	GU	HI	ID	IL	IN	IA	KS
State has procedures for reviewing orders 36 months old	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
State has guidelines for establishing support amounts	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
State has an adequate number of staff to review cases due	N	N	Y	Y	Y	Y	Y	Y	N	Y	N	Y	N	Y	N	Y	N	Y
State staff are adequately trained to conduct reviews	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
State screens cases due before initiating a full-scale review	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
State has set standards which warrant an adjustment	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	N	Y	Y	Y	Y	Y
State does not have problems with interstate cases	Y	N	Y	N	Y	Y	Y	N	Y	Y	N	Y	Y	Y	N	N	Y	N
State produces statistical reports to rate performance	Y	Y	N	N	N	Y	Y	Y	Y	N	N	N	N	N	Y	N	N	N
State has completed reviews of all appropriate cases	N	N	Y	Y	N	N	Y	Y	N	N	N	N	N	Y	N	N	N	Y
State has a fully automated system to process due cases	N	N	N	N	N	Y	Y	Y	N	N	N	N	N	Y	Y	N	N	N
State is not fully automated but intends to be by 09/30/95	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y

Y = YES (+)
 N = NO (-)
 X = NO RESPONSE DUE TO LEVEL OF NON-COMPLIANCE (-)
 O = CAN'T DETERMINE (-)

COMPOSITE OF STATE RESPONSES REFLECTING PROBLEM AREAS
IN PROCESSING REVIEW AND ADJUSTMENT CASES

FACTORS OF STATES' REVIEW AND ADJUSTMENT PROCESS	STATES																		
	KY	LA	ME	MD	MA	MI	MN	MS	MO	MT	NE	NV	NIH	NJ	NM	NY	NC	ND	
State has procedures for reviewing orders 36 months old	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
State has guidelines for establishing support amounts	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
State has an adequate number of staff to review cases due	N	Y	N	N	Y	N	N	Y	Y	N	Y	Y	Y	N	N	O	Y	Y	Y
State staff are adequately trained to conduct reviews	Y	Y	X	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
State screens cases due before initiating a full-scale review	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
State has set standards which warrant an adjustment	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
State does not have problems with interstate cases	Y	Y	X	Y	Y	Y	N	Y	Y	N	Y	Y	Y	Y	Y	O	Y	N	N
State produces statistical reports to rate performance	N	N	X	N	Y	N	Y	N	Y	Y	Y	Y	N	Y	N	N	Y	N	N
State has completed reviews of all appropriate cases	N	Y	N	N	Y	N	N	N	Y	N	N	Y	N	N	N	N	Y	N	N
State has a fully automated system to process due cases	N	N	X	N	Y	N	N	N	N	Y	Y	Y	N	Y	N	N	N	N	N
State is not fully automated but intends to be by 09/30/95	Y	Y	X	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y

Y = YES (+)
 N = NO (-)
 X = NO RESPONSE DUE TO LEVEL OF NON-COMPLIANCE (-)
 O = CAN'T DETERMINE (-)

**COMPOSITE OF STATE RESPONSES REFLECTING PROBLEM AREAS
IN PROCESSING REVIEW AND ADJUSTMENT CASES**

FACTORS OF STATE'S REVIEW AND ADJUSTMENT PROCESS	STATES																	
	OHI	OK	OR	PA	PR	RI	SC	SD	TN	TX	UT	VI	VT	VA	WA	WV	WI	WY
State has procedures for reviewing orders 36 months old	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
State has guidelines for establishing support amounts	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
State has an adequate number of staff to review cases due	Y	Y	N	Y	Y	O	N	Y	N	Y	N	N	Y	Y	Y	N	Y	Y
State staff are adequately trained to conduct reviews	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y
State screens cases due before initiating a full-scale review	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
State has set standards which warrant an adjustment	Y	Y	N	N	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y
State does not have problems with interstate cases	Y	Y	Y	Y	Y	O	Y	Y	N	Y	N	N	Y	Y	Y	Y	Y	Y
State produces statistical reports to rate performance	Y	N	N	Y	N	N	N	Y	N	Y	Y	N	N	Y	N	Y	Y	Y
State has completed reviews of all appropriate cases	Y	N	Y	Y	N	N	N	Y	N	Y	N	N	N	N	N	N	Y	N
State has a fully automated system to process cases due	N	N	N	N	N	Y	N	Y	N	N	N	N	N	N	N	Y	N	N
State is not fully automated but intends to be by 09/30/95	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y

Y = YES (+)
 N = NO (-)
 X = NO RESPONSE DUE TO LEVEL OF NON-COMPLIANCE (-)
 O = CAN'T DETERMINE (-)

APPENDIX B

**BARRIERS REPORTED
BY STATE CHILD SUPPORT AGENCIES**

**Barriers Reported
by State Child Support Agencies**

Listed in sequence of the number of times noted

- ▶ Antiquated automation systems slow down the review and adjustment process (41)
- ▶ Insufficient staff resources make it difficult to meet overwhelming caseload demands (24)
- ▶ Timeframes are difficult to meet under the conditions listed above (15)
- ▶ Two existing interstate laws make handling interstate cases troublesome (12)
- ▶ The judicial process is too cumbersome (8)
- ▶ The court systems are too overloaded (8)
- ▶ Conflict of interest issues raise legitimate concerns and slow the process down (6)
- ▶ Fiscal constraints can make it difficult to meet the review and adjustment provisions (4)
- ▶ The Federal government needs to provide training/guidance to child support agencies so that they fully understand the review and adjustment regulations (3)
- ▶ The inability to impute income hinders the review and adjustment process (2)
- ▶ The review and adjustment process is a difficult process to implement (2)
- ▶ Getting all parties' cooperation is difficult and prolongs completing reviews (1)
- ▶ Many cases due for review are eliminated from an actual review once the review criteria is applied (1)
- ▶ Cases could be easier to handle if standardized financial statements were used by all support agencies (1)
- ▶ It can be difficult to get wage information for self-employed individuals (1)
- ▶ The Federal mandated timeframes for review and adjustment are longer than those set for enforcing an initial order (1)
- ▶ The cooperation from Federal employers is sometimes more difficult to attain than other type employers (1)