

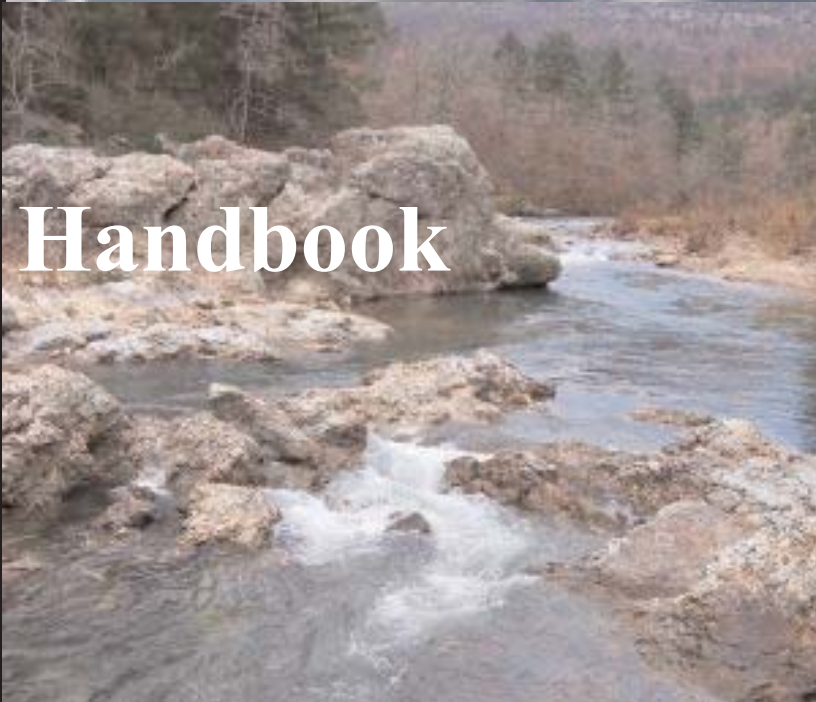
Missouri

FIDM



Financial Institution Data Match

Program Handbook



MISSOURI
DEPARTMENT OF SOCIAL SERVICES
Family Support Division

Brief Historical Overview

Federal welfare reform was designed to ensure that parents take a fair share of the responsibility for the financial support of their children. Federal law [Public Law 104-193 known as the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA)] includes numerous enforcement tools intended to increase child support collections.

Federal law [42 U.S.C. 666 (a)(17)(A)] requires each state, in cooperation with the financial institutions operating in that state, to develop and operate a data match program. Quarterly, each financial institution doing business in the state will provide the name, record address, social security number, and other identifying information for each delinquent obligor who maintains an account at such institution and who owes past-due child support.

Section 454.507, RSMo, establishes the Missouri Financial Institution Data Match (FIDM) program. This statute can be viewed at <http://www.moga.mo.gov/statutes/c400-499/4540000507.htm>.

Two Types of Data Matching Available

FIDM personnel will work with financial institutions to conduct data matches and provide that data to the Family Support Division of the Missouri Department of Social Services to identify accounts of delinquent obligors. A financial institution may choose the type of data matching that best suits its needs from the following two options:

Data Match Method One

Under Method One (all accounts method), the financial institution submits a file containing all open accounts. This file is matched against the child support records of delinquent obligors. The data matches are done using data specifications approved by the Federal Office of Child Support Enforcement.

Data Match Method Two

Under Method Two (matched accounts method), the financial institution receives a file containing child support records of delinquent obligors, matches the file against all open accounts, and returns a file of matched records. The data matches are done using data specifications approved by the Federal Office of Child Support Enforcement.

Data Match Methods

Method 1

Financial institution submits file of all open accounts to FIDM vendor, CSLN.



CSLN matches delinquent obligor records against account records sent by the financial institution.



CSLN sends matched account records to Missouri FSD weekly.

Method 2

Missouri FSD sends file of delinquent obligors to FIDM vendor, CSLN.



CSLN uploads file of delinquent obligors to FIDM website.



Financial institution downloads delinquent obligor file, matches file against all open accounts, and creates a matched accounts file (i.e., account holders who owe child support arrears).



Financial institution uploads matched accounts file to FIDM website.



CSLN sends matched account records to Missouri FSD weekly.

Reporting Timeframes

Indicate which month and week of the calendar quarter the financial institution will transmit files or perform the data match and transmit files. It is often helpful to consult your service bureau for advice on selecting a reporting cycle, as they frequently report once each quarter for all clients.

	Month	Week 1	Week 2	Week 3	Week 4
Months 1	January April July October	Days 1-7	Days 8-15	Days 16-22	Days>22
Months 2	February May August November	Days 1-7	Days 8-15	Days 16-22	Days>22
Months 3	March June September December	Days 1-7	Days 8-15	Days 16-22	Days>22

- ◆ Example: If you select Month 1, Week 1, then your quarterly reporting dates will be: **January 1-7, April 1-7, July 1-7, October 1-7.**
- ◆ Example: If you select Month 2, Week 4, then your quarterly reporting dates will be: **February 23-28/29, May 23-31, August 23-31, November 23-31.**
- ◆ Example: If you select Month 3, Week 3, then your quarterly reporting dates will be: **March 16-22, June 16-22, September 16-22, December 16-22.**

Steps to Getting Started with FIDM

Step 1: Materials

Review this FIDM Program Handbook, the Financial Institution Data Match (FIDM) Agreement, and the Financial Data Match Specifications found on the Federal Office of Child Support Enforcement's web site at <http://www.acf.hhs.gov/programs/cse/fct/fidm/dataspecs.pdf>.

Step 2: Data Processing

Decide if data match will be done by in-house data processing staff or a service provider. Share this FIDM Program handbook with appropriate data processing personnel.



Step 3: Methodology

Decide whether you will use the "all accounts" data match methodology (Method One) or the "matched accounts" methodology (Method Two).

Step 4: Responsibility

Identify contact person(s) who will be responsible for the FIDM program for your financial institution. Share a copy of the FIDM Program Handbook with them. This handbook can be downloaded from the Missouri FIDM website, <http://www.mo-childsupport-datamatch.org>.

Provide the requested information regarding the contact person(s) on Attachment A of the FIDM Agreement.

Step 5: Complete Your Enrollment

Customer Service representatives are available to assist you with any questions about the FIDM program or the Agreement between 8:00 am - 5:00 pm Central Time toll-free 1-866-646-7711.

Step 6: Mail in Your Agreement

Please sign and return the Agreement form to:

Missouri Financial Institution Data Match Program
PO Box 106100
Jefferson City, MO 65110-6100

Step 7: Reimbursement Option

The Family Support Division will reimburse financial institutions conducting the FIDM match for actual costs incurred up to \$75 per quarter. To date, many financial institutions have indicated a willingness to conduct matches at no cost due to the purpose of the law, which is to assure that children receive the financial support that they are due from their parents.

When your quarterly data match file is submitted, mail an invoice for reimbursement to:

Missouri Financial Institution Data Match Program
PO Box 106100
Jefferson City, MO 65110-6100

For information about the reimbursement policy, please call toll-free 1-866-646-7711.



Frequently Asked Questions

What is the purpose of the Financial Institution Data Match (FIDM)?

The purpose of FIDM is to bring monetary aid to children by identifying accounts belonging to delinquent obligors. Once identified, these accounts may be subject to wage garnishment, liens, and levies issued by state or local child support enforcement agencies.

What legislation established the FIDM program?

Public Law 104-193, the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), also known as the Welfare Reform Act, contains the provisions for the Financial Institution Data Match (FIDM). Also, Public Law 105-200, the Child Support Performance and Incentive Act of 1998, modified PRWORA to better facilitate the data match for multi-state financial institutions. All States and Territories have laws in place to meet the FIDM requirements of PRWORA. Reference [RSMo 454.507](#).

Who decided how FIDM should work?

The Financial Institution Work Group, comprised of representatives from financial institutions and their associations, third-party processors, software providers, and Federal and State child support representatives, serves as an advisory group to the Federal Office of Child Support Enforcement (OCSE) for this purpose. The Work Group members provide advice on agreements, fees, operations, and outreach efforts. In addition, they develop uniform data specifications which will or are being used by all States, Territories, and Financial Institutions to conduct the data match.

Should the financial institutions that exchange data be concerned about privacy issues?

Child support programs have very tight confidentiality restraints and this is no exception. It is clear that data match information must be used only to locate assets and enforce child support orders. Further, the state has designed a system that is not intrusive and is highly confidential. Under PRWORA, a financial institution will not be liable under any Federal or State law to any person for certain disclosures of data match pursuant to the act. Reference [42 U.S.C. Section 666\(a\)\(17\)\(C\)](#).

Will there be any reimbursement for costs incurred by compliance with this program?

The Family Support Division will reimburse financial institutions conducting the FIDM match actual costs incurred up to \$75 per quarter. To date, many institutions have indicated a willingness to conduct matches at no cost due to the purpose of the law, which is to assure that children receive the financial support that they are due from their parents.



How is a financial account defined?

RSMo 454.507 defines an account as: a demand deposit, checking or negotiable withdrawal order account, savings account, time deposit account or money market mutual fund account.

What information is returned through FIDM?

Name of account holder, record address, social security number or other taxpayer identification number, and other identifying information. Refer to the Financial Institution Specifications Handbook for the detailed record layout.

How often will financial institutions be required to submit match information?

Institutions must submit information quarterly. Institutions select the month and week of each calendar quarter to transmit or perform the data match and transmit.

What data specifications are to be used for the transfer of data?

Missouri has adopted a record layout of information that is based on the Financial Institution Data Match Specifications Handbook. The handbook can be found on the Internet at <http://www.acf.hhs.gov/programs/cse/fct/fidm/dataspecs.pdf>.

How can I obtain additional information?

If you have questions regarding agreement processing, technical support, scheduling, or status verification, please call the Missouri Financial Institution Data Match customer support center toll-free at 1-866-646-7711 between 8:00am and 5:00pm Central Time.

- RSMo 454.507: <http://www.moga.mo.gov/statutes/C400-499/4540000507.HTM>
- Federal Office of Child Support Enforcement Website is: <http://www.acf.hhs.gov/programs/css/financial-institutions>

How is the Family Support Division going to decide which accounts to seize?

The Family Support Division will look at the specific circumstances in each case in determining whether or not to seize an account.

Will the Family Support Division be taking complete balances from all accounts?

Decisions regarding how much of an account to seize will depend on the amount owed and the type of account. Any account of less than one hundred dollars will not be seized.



What about co-owners, how will they be protected?

See [RSMO 454.507](#).

How does Method One, the All Accounts Method, work?

- Financial institutions submit a file identifying all open accounts to the Family Support Division.
- The Family Support Division conducts an internal match against delinquent obligors.

How does Method Two, the Matched Accounts Method, work?

- The Family Support Division provides an inquiry file, containing delinquent obligors, to the financial institution.
- The financial institution conducts an internal match against its open accounts.
- The financial institution sends a file to the Family Support Division that reports information on all accounts maintained by individuals on the inquiry file.

Can a financial institution be held liable for the release of account information relating to the Missouri Financial Institution Data Match program and the levies that may result?

No. Section 466(a)(17)(C) [42 U.S.C. 666(a)(17)(C)] of the Social Security Act established that a financial institution shall not be liable under federal or state law to any person for any disclosure of information to the State IV-D agency.

Financial institutions will not be held liable for any other action taken in good faith to comply with the requirements of FIDM. See [RSMO 454.507](#).