

# CPR

## *Center for Parental Responsibility*

*P.O. Box 130776 St. Paul, MN 55113 Telephone: 651/490-9277  
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July 20, 2006

Dr. Wade Horn  
Asst. Secretary for Children and Families  
U.S. Department of Health and Human Services  
200 Independence Avenue, S.W.  
Washington, D.C. 20201

RE: Interim Final Regulation Implementing Next Phase of Welfare Reform

Dr. Wade Horn,

I have been leading a group of 7 researchers in Minnesota since the year 2000. This research team has remained active and we continue to meet almost weekly. These volunteers focus their effort strictly on the history of Title IV-D and the ideas and actions necessary to facilitate the **national Title IV-D reform** needed to put this **welfare service program** back in compliance with congressional intent and spare our families further damage.

The Title IV-D child support collection and enforcement organization is destroying families and children under the guise of “helping children” and “the best interest of children.” However, whether intentional or an unintended consequence, the federal Title IV-D program is directly responsible for enforcing policies to the local agencies that drive fathers away and make it impossible for fit, loving, responsible fathers to continue to be involved in the lives of their children. For the sake of our children and generations of families and leaders to come, the Title IV-D program must be brought back into compliance with congressional intent, the constitution, and simple common sense. The Title IV-D program has grown so far out of scope that an endless number of constitutional violations occur every day in every state. Title IV-D was never intended to be a “welfare for the rich” program that ensured fatherlessness. This program provides incentive for mothers to have multiple children with multiple fathers and never marry them in order to gain a financial incentive, and it provides an incentive for even self-sustaining middle class women to divorce.

The Title IV-D program is out of control, to the extent and even worse than the IRS of years ago, before the IRS moved for a “kinder and gentler” organization that treated people with dignity and respect and basic reasonableness.

**I fully support the submission by Lary Holland in regard to the changes needed in the Title IV-D program.** Please take serious consideration to ensure the Title IV-D program is put back into compliance by providing the state and local IV-D agencies direction that the Title IV-D welfare services must be limited to those on welfare and those at risk of falling on welfare by being eligible for welfare if they don't get their child support. Our research indicates that no further legislation is needed to make this change, just change your agency implementation, to make IV-D consistent with federal intent. If the vague laws that have allowed the overreach of authority and unlawful expansion of the Title IV-D program to continue need to be clarified, I support clarification by Congress to **limit Title IV-D services to those on welfare (cost**

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**recovery) and those at risk of falling on welfare (cost avoidance) if they would qualify for welfare without their child support payment.**

There is **no need to continue to move people from self-reliance to dependence on government IV-D welfare services** when there is no financial need. All authority for Title IV-D is derived from the Social Security Act and we must no longer be providing a subsidized collection agency for *every divorce* and *every out-of-wedlock birth* for the middle class and even upper middle class. According to the improper direction from your office, the Chief Justice of the Minnesota Supreme Court (and many wealthy individuals like her) qualified for Title IV-D welfare services, and would be provided services at taxpayer expense if she simply filled out an application and paid \$25.00. This erroneous and even unlawful application of Title IV-D services is wrong and must stop. We are looking for your leadership to make the common sense changes.

Sincerely,

Molly K Olson  
Founder and Volunteer Executive Director