# **Supporting Statement For OMB Clearance**

**Intergovernmental Referral Guide (IRG)** 

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# SUPPORTING STATEMENT:

# **PART A – JUSTIFICATION**

Part A of the Supporting Statement for this information collection, Intergovernmental Referral Guide (IRG), addresses the 18 points outlined in Part A of 5 CFR 1320.

#### A. JUSTIFICATION

## 1. Circumstances Necessitating Data Collection

The purpose of the Intergovernmental Referral Guide (IRG) project is to provide States, Foreign Nations and Tribes with an effective and efficient way of viewing and updating profile, address and FIPS code information by consolidating data available through numerous discrete sources into a centralized, automated repository.

The IRG has been expanded to include Tribal information. It is an essential reference tool, maintained by OCSE, that provides State and Tribal Child Support Enforcement (CSE) agencies with the information needed to process intergovernmental child support enforcement cases. The IRG consists of State and Tribal profiles, which provide a concise overview of State and Tribal child support enforcement procedures, as well as a directory of all Federal, State, local addresses, selected international addresses, and Location Codes and Addresses (formally FIPS Codes).

#### 2. How, By Whom, and For What Purpose Information Is To Be Used

#### 2.1 How the information is to be used

The IRG information is provided by State and Tribal CSE agencies for use by other State and Tribal CSE agencies to improve intergovernmental communication. The IRG is an easy-to-use automated reference guide that State and Tribal CSE personnel can access to obtain answers to their questions on intergovernmental referrals.

#### 2.2 By whom the information is to be used

In addition to information received from State and Tribe CSE agencies, information is also collected from child support programs in 10 foreign countries and 13 Canadian provinces. It is anticipated that within one year up to 44 Tribes will be providing profile information and updates to the IRG.

The general public has access to the IRG as well, but cannot update any information. Instead, public users are only able to view and download profiles and limited address information as specified for security purposes.

# 2.3 For what purpose the information is to be used

State and Tribal users are able to view and update their profile and/or address information immediately, as changes occur. As a result, State and Tribal CSE agencies have access to the most comprehensive and timely information available so that they can effectively process intergovernmental cases. The Foreign Countries and Canadian Provinces are also

able to view profile and/or location codes and address information. As additional Tribes obtain access to the internet, they will also be able to access this information.

#### 3. Use of Information Technology

The IRG information is collected through OCSE's website, which can be accessed by State and Tribal users, as needed. These users are also able to edit and update information associated with their particular State or Tribe online, as changes occur. The Foreign Countries and Canadian Provinces email their address information to OCSE, and a staff member enters the information in the IRG on their behalf.

#### 4. Efforts to Avoid Duplication

The only existing source for obtaining State-At-A-Glance Profile and Directory of Addresses/FIPS Code information in a single location is the hard copy guide published every two to three years by the National Child Support Enforcement Administration (NCSEA). Because NCSEA does not have a mechanism in place for States to update their information as State laws and/or addresses change, the hard copy information is often outdated soon after it is published. Therefore without the IRG system, States would not have current information and might not be able to process their intergovernmental child support cases in a timely manner. In addition, there is a fee associated with obtaining the hard copy version of the NCSEA document. Due to budget constraints, not all State users have access to the hard copy document. NCSEA has not yet compiled Tribal information.

# 5. Efforts to Minimize Impact on Small Entities

No discernible impact is associated with the collection of this information.

#### 6. Consequences if Data Collection Is Not Conducted

Timely collection and dissemination of IRG information is vital to efficient and effective enforcement of intergovernmental child support cases. State and Tribal Profile and Location Codes and Address information contained in the IRG is used to facilitate the timely exchange of information among State and Tribal CSE agencies. For these reasons, it is necessary for States and Tribal entities to provide one another with comprehensive, up-to-date profile and address information.

# 7. Special Circumstances

Not applicable.

#### 8. Publication of Public Notice

A notice was published in the Federal Register on September 18, 2008 at FR Volume 73, Number 182, page 54161-54162, which allowed for a 60-day comment period for the public to submit in writing any comments about this information collection. No comments were received.

# 9. Provision of Payment or Gift to Respondents

Not applicable.

## 10. Assurances of Confidentiality

No confidential or sensitive information is collected for this data collection.

#### 11. Questions of a Sensitive Nature

No questions of a sensitive nature will be asked.

# 12. Estimates of Respondents' Hour Burden and Costs

**Table 12.1** 

Instrument	Number of Respondents	Number of Responses per Respondent	Average Burden Hours Per Response	Total Burden Hours
IRG State User Guide  – States and Territories	54	18	0.3	292
IRG State User Guide  – Foreign Nations	23	2	0.1	5
IRG Tribal User Guide	44	18	0.3	238

**Estimated Total Annual Burden Hours: 535\*** 

The annual burden for collecting IRG information from States and Territories is 292 hours, based on 54 States and Territories providing an average of 18 updates each year, at approximately 0.3 hours per update.

The annual burden for collecting IRG information from Foreign Countries is 5 hours, based on 10 Foreign Countries and 13 Canadian Provinces providing an average of 2 updates each year, at approximately 0.1 hours per update.

<sup>\*</sup> Figures have been rounded up.

The annual burden for collecting IRG information from Tribes is 238 hours, based on 44 Tribes providing an average of 18 updates each year, at approximately 0.3 hours per update.

Annual burden hours were estimated through consultations with a representative group comprised of five states.

The total annualized cost to the States and Foreign Countries for collection of IRG information is \$9,630, based on an hourly figure of \$18 for State, Tribe or Foreign Country staff time.

## 13. Estimate of Annual Cost Burden to Respondents

Ongoing maintenance of IRG information from State, Tribe and Foreign Countries uses existing resources (staff, personal computers, etc.); therefore, there is no operation/maintenance costs associated with the IRG. Because Tribes using the IRG already have internet access, there are no startup costs associated with Tribes to use the IRG.

#### 14. Estimate of Annualized Cost to the Federal Government

Total annualized cost to the Federal Government is estimated to be \$1,197,990. Marginal annualized costs for ongoing maintenance of the IRG are estimated at \$927,620. Enhancement and migration costs for the IRG are estimated at \$270,370.

#### 15. Program Burden Changes or Adjustments

The increase in burden hours is due to the addition of a new IC that collects information from Tribes which is a new respondent pool.

# 16. Plans for Analysis and Publication

State and Tribal Profiles, Location Codes and Addresses updates will be published on OCSE's IRG web site to provide State and Tribal CSE agencies with the current information they need to process intergovernmental child support enforcement cases.

#### 17. Display of Expiration Date

OCSE will display the expiration date of the OMB approval on the information collection instruments.

#### 18. Exception to the "Certification for Paperwork Reduction Act Submissions"

There are no exceptions.