

**Supporting Statement For
OMB Clearance**

Intergovernmental Referral Guide (IRG)

January 2012

Prepared by:

U.S. Department of Health and Human Services
Administration for Children and Families
Office of Child Support Enforcement
370 L'Enfant Promenade S.W.
Washington, DC 20447

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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.

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A. JUSTIFICATION

1. Circumstances Necessitating Data Collection

The Intergovernmental Referral Guide (IRG) is an essential tool that provides state and tribal child support enforcement (CSE) agencies with an effective and efficient method for updating and accessing information needed to process intergovernmental child support cases.

Maintained by the Office of Child Support Enforcement (OCSE), the IRG is a centralized and

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automated repository of state and tribal profiles, which contain high-level descriptions of each state and tribal CSE program. The available information includes:

- A summary about each state and tribal CSE program;
- Uniform Interstate Family Support Act (UIFSA);
- Reciprocity;
- Age of majority;
- Statute of limitations;
- Income withholding;

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- Paternity establishment, enforcement and modification and review/adjustment of child support orders, lump sum payments, and insurance matching; and,
- A directory of all federal, state, tribal and local addresses, selected international addresses and Location Codes/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

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The IRG information will be used to assist with processing intergovernmental child support cases.

2.2 By whom the information is to be used

The IRG is accessible to all state and tribal CSE agencies. Information is also collected from child support programs in 15 foreign countries and 11 Canadian provinces that have federal reciprocity. It is anticipated that within one year up to 52 tribes will be providing profile information and updates to the IRG.

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

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2.3 For what purpose the information is to be used

The purpose of the IRG project is to provide states, tribes, and foreign countries with an effective and efficient way of viewing and updating profile information by consolidating CSE information that would otherwise only be available through numerous other sources.

3. Use of Information Technology

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The IRG information is collected and accessed through OCSE's website. Authorized users are also able to update information associated with their particular state or tribe online as changes occur. The authorized foreign countries and Canadian provinces email their address information to OCSE, and an OCSE staff member enters and certifies the information into the IRG on their behalf.

4. Efforts to Avoid Duplication

The only other source for obtaining a state-at-a-glance profile and directory of addresses/FIPS

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code information in a single location is a hard copy guide published every two to three years by the National Child Support Enforcement Administration (NCSEA). The NCSEA guide is often outdated soon after it is published, thus reducing the possibility of it containing current information or information contained in the IRG.

In addition to limitations to the NCSEA guide due to the publication cycle, the guide does not contain tribal information, nor does it have a mechanism in place for states to update their information as state laws and/or addresses change. There is also a fee associated with obtaining the hard copy version of the NCSEA document and due to budget constraints, not all state users

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have access to the hard copy document. While this will further limit the possibility of duplicative information, it also impedes timely and efficient processing of intergovernmental child support cases.

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

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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. Without the IRG, states would not be able to provide one another with comprehensive, up-to-date profile and address information and might not be able to process their intergovernmental child support cases in a timely manner.

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7. Special Circumstances

Not applicable.

8. Publication of Public Notice

A notice was published in the Federal Register on November 21, 2011 at 76 Fed. Reg 71978, which allowed for a 60-day comment period for the public to submit in writing any comments

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about this information collection. The State of Washington provided suggested revisions to the State and Tribal Profile; however, revisions can only be made with agreement by the IRG Workgroup. OCSE will first discuss the rationale for the proposed revisions with the State of Washington, and then present the proposed changes for review and consideration at the next IRG Workgroup conference call scheduled for February 2012.

9. Provision of Payment or Gift to Respondents

Not applicable.

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10. Assurances of Confidentiality

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

11. Questions of a Sensitive Nature

Respondents will not be asked any questions of a sensitive nature.

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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
Intergovernmental	54	18	0.3	292

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Referral Guide: State Profile Guidance – (States and Territories)				
Intergovernmental Referral Guide: State User Guide – Foreign Countries	26	2	0.1	5

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Intergovernmental Referral Guide: Tribal Profile Guidance	52	18	0.3	281
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Estimated Total Annual Burden Hours: 578*

* Figures have been rounded up.

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

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hours per update.

The annual burden for collecting IRG information from foreign countries is 5 hours, based on 15 foreign countries and 11 Canadian provinces providing an average of 2 updates each year, at approximately 0.1 hours per update.

The annual burden for collecting IRG information from tribes is 238 hours, based on 52 tribes providing an average of 18 updates each year, at approximately 0.3 hours per update.

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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

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\$12,774 based on an hourly figure of \$22.10 ¹for state, tribe or foreign country staff time. Increases in the total annualized costs from the previous PRA submission are due to an increase in the number of users and updating the hourly wage estimate based on current Bureau of Labor Statistics figures.

13. Estimate of Annual Cost Burden to Respondents

Ongoing maintenance of IRG information from states, tribes and foreign countries uses existing resources (staff, personal computers, etc.); therefore, there is no operation/maintenance costs

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associated with the IRG. Because tribes using the IRG already have internet access, there are no startup costs for 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 \$589,618. This includes federal salaries and benefits of \$82,836 and contractor and hardware/software costs of \$506,782.

15. Explanation for Program Changes or Adjustments

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There is an adjustment due to the number of tribal respondents increasing from 121 to 132 causing an increase in requested burden from the currently approved of 535 hours to the requested 578 hours.

In addition there are program changes in the Tribal Profile to remove section “C” and to simplify and remove questions. The State Profile was revised to include new questions and to simplify others. These revisions to the Tribal and State Profiles do not impact hour burden for

⁴Source: Bureau of Labor Statistics, National Compensation Survey July 2010

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the respondents.

16. Plans for Analysis and Publication

State and tribal profiles, location codes and address updates will be published on OCSE's IRG web site to provide state and tribal CSE agencies, as well as foreign countries, with the current information they need to process intergovernmental child support cases.

17. Display of Expiration Date

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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.

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**PART B – COLLECTION OF INFORMATION EMPLOYING
STATISTICAL METHODS**

The information collection requirements outlined in this report do not employ the use of statistical methods.

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