

THE SUPPORTING STATEMENT

Part A - Justification

A. Requests for approval shall:

1. Circumstances Making the Collection of Information Necessary – 45 CFR 303.7 -- Provision of Services in Intergovernmental IV-D; Federally Approved Forms (0970-0085)

42 U.S.C. 666(f) requires state child support enforcement agencies to enact the Uniform Interstate Family Support Act (UIFSA) into state law. Section 311(b) of UIFSA requires states to use standard interstate forms as mandated by federal law. 45 CFR 303.7(a)(4) requires states to use federally approved forms in intergovernmental IV-D cases. Authorizing statutes and regulations are attached.

2. Purpose and Use of the Information Collection

The federally approved intergovernmental forms are used to facilitate working child support cases across state lines. The forms are readily recognizable and provide the information states agree is needed to process a case. More than one state may become involved when the parents live in different states, when support orders were issued in states where the parties no longer reside, or when assets are sought in states other than the state enforcing the support order. Intergovernmental cases are the most complex and difficult cases. About 15-25 percent of child support cases are believed to involve more than one state.

3. Use of Improved Information Technology and Burden Reduction

Beginning in FY 1997 45 CFR 307.10(b)(14)(vi) required state child support agencies to integrate all processing of interstate cases with the computerized support enforcement system in the state. Beginning in FY 2000, 45 CFR 307.11(f)(4) required state child support agencies to exchange information with agencies of other states and interstate information networks. The federally approved intergovernmental forms have been automated by CSENet 2000, allowing forms information to be transmitted electronically between states. State child support systems are programmed to generate their own completed forms, as well as those received from other states.

4. Efforts to Identify Duplication and Use of Similar Information

There is no similar information available through any known source or mechanism. Specific case information is known only to the child support program in the custodial parent's state. The child support program in the noncustodial parent's state cannot obtain this information (and take the appropriate action), unless the information is provided by the child support program in the custodial parent's state. This is the nature of intergovernmental child support case processing and the reason why the federal government was originally charged with developing federally approved intergovernmental forms.

5. Impact on Small Businesses or Other Small Entities

This collection of information will have no impact on small businesses or other small entities because both the point of origin and the destination of the forms are state child support agencies and judicial courts.

6. Consequences of Collecting the Information Less Frequently

If the federally approved intergovernmental forms were not used, the federal child support program would be seriously impaired in meeting its mission of ensuring that children have paternity established and receive the support to which they are entitled. Because approximately 15-25% of child support cases involve interstate casework, the parentage and support for a significant number of children would be delayed or even placed in jeopardy, as delay can result in loss of contact with the parties. The efficiencies associated with use of the forms would be lost and more resources would be required to do less work at the state level.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

There are no special circumstances regarding the collection of this information.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

We published the required 60-day notice in the Federal Register on July 01, 2013, Volume 78, Number 126 on page 39298, soliciting comments on the information collection. In addition, we sent out a notice about the opportunity to comment to the child support enforcement community via a Dear Colleague Letter (DCL-13-11).

Based on the comments we received in response to the 60-day notice in the Federal Register (Volume 78, Number 126, page 39298), we have determined we need to address several issues, particularly relating to the protection of Personal Identifiable Information (PII), and may need to restructure the intergovernmental forms. Because multiple changes to the forms may impact state and federal procedures and systems, we need to thoroughly analyze the options for revising the forms, and provide states and the public the opportunity to comment on any changes and associated burden.

Therefore, at this time, we are requesting an extension of the current forms without any changes. Once we complete the analysis of the issues raised in response to the recent 60 day notice, we will propose changes to the forms and associated burden and request a new round of comments under the Paperwork Reduction Act. The changes will be based on the state's needs and the best interest of the program.

9. Explanation of Any Payment or Gift to Respondents

No payments or gifts are involved.

10. Assurance of Confidentiality Provided to Respondents

Information the states collect using the federally approved intergovernmental forms is subject to the confidentiality requirements at §454(26) of the Social Security Act (42 U.S.C. 654(26)) and the states' own confidentiality requirements protecting personal information in their possession. It is up to each state whether they provide an assurance of confidentiality to their respondents.

11. Justification for Sensitive Questions

Because of the purposes of the intergovernmental forms, it is necessary to include personal information regarding the mother and the alleged father of the child. The justification for these questions is that the forms serve as the basis for filing actions in the responding state. This saves the petitioner from traveling to another state to file the actions personally.

In public assistance cases, the mother is informed that her cooperation with the state child support agency's efforts to establish paternity and secure child support is an eligibility requirement for the receipt of public assistance. In non-assistance cases, the mother or alleged father is advised that the state child support program cannot establish paternity without this information. In non-assistance cases, the petitioner decides whether he or she wishes to proceed.

It is necessary to obtain Social Security numbers as part of this information collection. This is required by the Social Security Act: §453, Federal Parent Locator Service; §453A, State Directory of New Hires; §454, State Plan for Child and Spousal Support; §454A, Automated Data Processing; and by cross-reference to these sections in §454B, Collection and Disbursement of Support Payments. In addition, §466(a)(13) requires each state to have a law in effect requiring the recording of Social Security numbers in the records pertaining to certain family matters, including recording the number of any individual who is subject to a divorce decree, support order, or paternity determination or acknowledgment. §466(c)(2) requires each state to have a law and procedures in effect for child support purposes under which each party in a child support case is required, subject to privacy safeguards, to file with the child support agency, and update as appropriate, information on location and identity of the party, including Social Security number. 42 U.S.C. 653, 653A, 654, 654A, 654B, and 666.

12. Estimates of Annualized Burden Hours and Costs

ANNUAL BURDEN ESTIMATES

Instrument	Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Response	Total Burden Hours
Transmittal 1	54	19,392	0.25	261,790.25
Transmittal 2	54	14,544	0.08	62,829.66
Transmittal 3	54	970	0.08	4,188.64
Uniform Petition	54	11,635	0.08	50,263.73
General Testimony	54	11,635	0.33	207,337.88
Affidavit Paternity	54	5,818	0.17	53,405.21
Locate Data Sheet	54	388	0.08	1,675.46
Notice of Controlling Order	54	388	0.08	1,675.46
Registration Statement	54	7,757	0.08	33,509.15

Estimated Total Annual Burden Hours:

676,683.20

The basis for this information is a small informal survey of state and local child support agencies asking for reaction to the prior burden estimate. Burden per response went down because of increasing automation at the state level.

The annualized cost to the 54 child support programs associated with the use of the federally approved intergovernmental forms packet is estimated at \$16,917,080. This amount is based on an estimated average hourly caseworker salary and fringe benefits of \$25 X 676,683 burden hours. (We no longer collect information on worker salaries. The most recent available figure was \$19.14 per hour in FY2002.)

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

There is no new annual cost burden to respondents resulting from this collection of information. No modifications have been made to the existing information collection.

14. Annualized Cost to the Federal Government

There are no significant costs to the Federal government associated with these forms. The forms were not revised significantly in terms of burden and they are not used to report any information to the Federal government.

15. Explanation for Program Changes or Adjustments

There is an adjustment due to the increase in the number of child support cases; however, there are no program changes.

16. Plans for Tabulation and Publication and Project Time Schedule

The resulting information will not be published for statistical use. The forms associated with this information collection are not used for data collection by the Federal government. They are used by the states to transmit child support case information to one another in order to process child support actions.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

There is no reason that the display of the OMB Expiration Date is Inappropriate.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

This information collection does not involve statistical methods, surveys or

survey methodology, nor is any information compiled for or reported to the federal government. This information collection consists of forms that child support agencies use to aid in uniform processing of their intergovernmental cases.
