

**Supporting Statement for
OMB Clearance**

Intergovernmental Reference Guide (IRG)

January 2015

Prepared by:

U.S. Department of Health and Human Services
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A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

The Intergovernmental Reference Guide (IRG) is an essential tool that provides the public, state, tribal, and international child support enforcement (CSE) agencies with an effective and efficient method for accessing information needed to process intergovernmental child support cases. The state and tribal CSE agencies update the information on the IRG.

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Maintained by the Office of Child Support Enforcement (OCSE), the IRG is a centralized and automated repository of state and tribal profiles, which contain high-level descriptions of each state and tribal CSE program. The available information includes, but is not limited to:

- Summary of each state and tribal CSE program;
- Uniform Interstate Family Support Act (UIFSA);
- Reciprocity;
- Age of majority;

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- Statute of limitations;
- Income withholding;
- Paternity establishment, enforcement and modification and review/adjustment of child support orders, lump sum payments, and insurance matching; and,
- Directory of all federal, state, tribal and local addresses, selected international addresses and Location Codes/Addresses (formally FIPS Codes).

The IRG information collection activities are authorized by: (1) 42 U.S.C. § 652(a)(7), which requires OCSE to provide technical assistance to state child support enforcement agencies to

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help them establish effective systems for collecting child and spousal support; (2) 42 U.S.C. §666(f), which requires states to enact the UIFSA; and (3) 45 CFR 303.7, requires state child support agencies to provide services in intergovernmental cases.

2. Purpose and Use of the Information Collection

2.1 For What Purpose the Information Is to Be Used

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

2.2 By Whom and How the Information Is to Be Used

The information is used by the public, state, tribal and international CSE agencies to process intergovernmental child support cases. The public and international CSE agencies have read-only limited access to the IRG and do not update any information. They are able to view and download profiles and access limited address information, as specified for security purposes.

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The only information available to the public and international CSE agencies is the following:

- State and tribal profile questions and responses
- Addresses with contact information
 - Central Registry Contact
 - Customer Service Contact
 - Domestic Violence Contact
 - State Disbursement Contact
 - State Parent Locator Contact

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2.3 For What Purpose the Information Is to Be Used

The IRG provides users an effective and efficient way of accessing child support information to process intergovernmental child support cases, which would otherwise only be available through other sources.

3. Use of Improved Technology and Burden Reduction

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The IRG information is accessed through OCSE's website, which provides an effective and efficient way to access child support information. Authorized users are also able to update information associated with their particular state or tribe online as changes occur.

4. Efforts to Identify Duplication and Use of Similar Information

The only other source for obtaining state and tribe's profile and location codes and address information in a single location is a hard copy guide published every two to three years by the

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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 IRG information.

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 or addresses change. There is also a fee associated with obtaining the hard copy version of the NCSEA document. However, due to budget constraints users may not be able to obtain the hard copy NCSEA guide. While this will further limit the possibility of

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duplicative information, it also impedes timely and efficient processing of intergovernmental child support cases.

5. Impact on Small Businesses or Other Small Entities

There is no impact to small entities.

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6. Consequences of Collecting the Information Less Frequently

Timely collection and dissemination of IRG information is vital to efficient and effective processing 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. Without the IRG, this comprehensive, up-to-date profile and address information will not be available to process intergovernmental child support cases in a timely manner.

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

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Not applicable.

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

A notice was published in the Federal Register on October 29, 2014, at 79 Fed. Reg. 64391, which allowed for a 60-day comment period for the public to submit in writing any comments about this information collection.

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9. Explanation of Any Payment or Gift to Respondents

Not applicable.

10. Assurance of Confidentiality Provided to Respondents

Confidential respondent data are requested for this information collection. The IRG contains state and tribal contact information. Only authorized users can view all IRG contact information.

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The public can view a limited subset of addresses (see section 2.2). The IRG is used to facilitate the timely exchange of information on intergovernmental cases.

11. Justification for Sensitive Questions

Not applicable.

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12. Estimates of Annualized Burden Hours and Costs

Table 12.1 Estimated Burden

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Instrument	Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Response	Total Burden Hours
Intergovernmental Reference Guide: State	54	18	0.3	291.60

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Instrument	Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Response	Total Burden Hours
Profile Guidance – (States and Territories)				

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Instrument	Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Response	Total Burden Hours
Intergovernmental Reference Guide:	62	18	0.3	334.80

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Instrument	Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Response	Total Burden Hours
Tribal Profile Guidance				

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Estimated Total Annual Burden Hours: 626.40

The annual burden for collecting IRG information from states and territories is 291.6 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 tribes is 334.80 hours, based on 62 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.

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The total annualized cost to the states and tribes for collection of IRG information is \$13,843. The

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total cost is based on an hourly wage rate of \$22.10 ¹for 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 rate estimate based on current Bureau of Labor Statistics figures.

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

Ongoing maintenance of IRG information from states and tribes uses existing resources (staff or personal computers); therefore, there are no operation/maintenance costs associated with the IRG. Tribes already use the IRG via the internet, so there are no startup costs for tribes.

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14. Annualized Cost to the Federal Government

Total annualized cost to the federal government is estimated to be \$590,674. This includes federal salaries and benefits of \$70,274 and contractor and hardware/software costs of \$520,400.

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Two program changes were made from the previous information collection approval: 1) the Foreign Countries Profile was removed from this information collection because foreign respondents do not need to be included in the burden hour calculation, per OMB Guidance and 2) the State Profile questions were revised to simplify responses pertinent for intergovernmental child support processing. The Tribal Profile questions did not change.

The revisions to the State Profile questions do not impact the respondent burden hour. However, the burden hour was adjusted from the previous approval of 578 hours to 626.40

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

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hours to reflect the removal of foreign country respondents and an increase in the number of new tribal entities with access to the IRG.

16. Plans for Tabulation and Publication and Project Time Schedule

State and tribal profiles, location codes, and address updates will be published on OCSE's IRG website to provide the public, state, tribal and international CSE agencies with the current information they need to process intergovernmental child support cases. There is no plan for statistical analysis.

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

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

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions.

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